# Captioning Prioritization Guidance

**Instructional materials used for teaching and learning at Sacramento State are increasingly in the form of multimedia.** Multimediaincludes a combination of text, audio, still images, animation, or video regardless of delivery system. Multimedia learning experiences can be engaging for many students, but some multimedia materials may not be accessible to all students. As part of the CSU’s Accessible Technology Initiative, our campus community can collaborate to support ensuring that multimedia is accessible to everyone by assuring captioning is present.

According to the National Deaf Center, captioning is not a transcript, interpreters, speech recognition or STTS. An accurate captioning file is more than the spoken language and will include the speaker ID, environmental noise, punctuation, and be properly synced to the speaker, etc. Captions provide auditory information that automatic speech recognition (ASR) technology may not be able to identify.

For instructional materials that include audio and, therefore, are in need of captioning, we need to assess how we prioritize captioning needs. Since the volume of captioning needed is immense, full compliance is challenging to achieve consistently (e.g., within semester or quarter time constraints), it is important for campuses to decide how to provide and support captioning even if it is not always in full compliance. **Prioritizing this effort is critical; decisions need to be based on the impact towards students, faculty, staff, and the public.**

The Sacramento State Captioning Prioritizing Guidance has been adapted from the [CSU Captioning Guidelines](https://ati.calstate.edu/instructional-materials/captioning). https://ati.calstate.edu/instructional-materials/captioning

## High Priority for 100% ADA-Compliant Captioning

* An accommodation is requested from a student, staff member, or other person who requires captioning.
* Multimedia will be shared multiple times and/or over an extended period of time.
* Multimedia is reused in new courses and newly revised segments of existing courses.
* Multimedia is used in a course for more than one semester.
* If captioning is required for one semester, the quality must be clear enough to allow equivalent access (defined as the ability to infer the meaning of whole sentences). **Note: At this time, automatic speech recognition (e.g., YouTube automatic captioning) is not acceptable for 100% compliance due to the tendency for errors, unless auto-captions are manually fixed by the content owner.**
* Multimedia is on a public facing web page (e.g. commencements or other public-facing streamed or recorded events, news and marketing videos).

## Low Priority for 100% ADA-Compliant Captioning

* Lecture capture is used to post the recording of a live class session (either face-to-face or online) will only be available for one semester, and the instructor has verified that they do not have an accommodation request from a student or participant in the class. As an example, if an instructor records a live Zoom session to post and share in the Learning Management System (LMS), and they do not have a student with a verified accommodation, they do not need to process the recording through a third-party captioning service to generate 100% ADA compliant captions. Built-in automatic captions will sufficiently meet the needs and are recommended to capture the conversation (even if they are not 100% accurate).

## Other Prioritization Considerations

* Any multimedia that is purchased should be delivered in a captioned state. If not, the campus must ensure that captioning will be done upon receipt.
* Archived materials are to be captioned upon request. Caption frequently requested materials. For example, a unit like an academic department, individual faculty member, or the library should proactively seek out captions for frequently requested materials.
* If the campus cannot provide the resources or cannot support specific technical concerns, then captioning should be outsourced. This requires funding, so each campus budget must accommodate it.
* Commencements or other public-facing events that are streamed or recorded, news and marketing videos may require outside live captioning (CART) services as well as outside services for adding captions after the live event for the purposes of archiving a recording.

[Caption Media Poster](https://mysacstate-my.sharepoint.com/:b:/g/personal/corinne_rowland_csus_edu/EWXD1FEFNfZKmOe3lEiPRz4BH8DVE3OD_n8iRjXUNVQzLA?e=wxxjlw)

## Policy

[Section 504](https://www2.ed.gov/about/offices/list/ocr/504faq.html) Section 504 is a federal law designed to protect the rights of individuals with disabilities in programs and activities that receive Federal financial assistance from the U.S. Department of Education (ED).

[Teach Act](https://nfb.org/images/nfb/publications/bm/bm14/bm1403/bm140305.htm) (Technology, Education, and Accessibility in College and Higher Education Act)

[Section 508](https://www.section508.gov/manage/laws-and-policies) requires that Federal agencies' electronic and information technology is accessible to people with disabilities, including employees and members of the public.

CSU Policy: In 2003, California Government Code 11135 applied [Section 508 of the Rehabilitation Act](https://www.access-board.gov/ict/#508-chapter-1-application-and-administration) as amended in 1998 to the CSU.

In January 2006, the CSU launched the Accessible Technology Initiative (ATI) in order to develop the work plan, guidance, and resources to assist campuses in carrying out the accessible technology provisions of ***CSU Executive Order 926****:*“It is the policy of the CSU to make information technology resources and services accessible to all CSU students, faculty, staff, and the general public regardless of disability.” https://www.csus.edu/information-resources-technology/ati/accessibility-statement.html

Academic Program Access for Students with Disabilities (404 link broken on the [SSWD Policy and Guidance page](https://www.csus.edu/student-affairs/centers-programs/services-students-disabilities/faculty-staff-resources.html))

[Sacramento State eLearning Policy](https://www.csus.edu/umanual/acadaff/aca-160.htm) (Suspended indefinitely) The policy applies to all matriculated e-Learning courses and degree/certificate programs offered by California State University, Sacramento

[Sacramento States Accessible Technology Policy](https://www.csus.edu/umanual/it/accessibletechnologypolicy.htm)

[WC3 Web Accessibility Initiative](https://www.w3.org/WAI/media/av/captions/#automatic-captions-are-not-sufficient) The World Wide Web Consortium’s (W3C) commitment to lead the web to its full potential includes promoting a high degree of usability for people with disabilities. The Web Accessibility Initiative (WAI) is an initiative of the W3C. https://www.w3.org/standards/webdesign/accessibility

## Definitions

Equal access- equal opportunity of a qualified person with a disability to participate in or benefit from educational aid, benefits, or services. [U.S. Department of Education, Office for Civil Rights.](https://www2.ed.gov/about/offices/list/ocr/504faq.html)

Equivalent Facilitation- The use of an alternative design or technology that results in substantially equivalent or greater accessibility and usability by individuals with disabilities than would be provided by conformance to one or more of the requirements in Chapters 4 and 5 of the Revised 508 Standards is permitted. https://www.access-board.gov/ict/#E101.2

EEAAP- An Equally Effective Alternative Access Plan describes how to provide alternate access to the same information or services offered by a less-than-accessible technology. <http://udloncampus.cast.org/page/policy_access>

Captioning- According to the National Deaf Center, captioning is not a transcript, interpreters, speech recognition or STTS. Additionally, providing interpreters to address a need to access video is not equal access, it is an accommodation, best to provide closed captioning. An accurate captioning file is more than the spoken language and will include the speaker ID, environmental noise, punctuation, and be properly synced to the speaker, etc. Captions provide auditory information that automatic speech recognition (ASR) technology may not be able to identify.

## FAQ

**For equal access, can the auto-caption feature be used if it is accurate?**

You cannot use this for equal access. Accuracy is not just the spoken language. It also needs to include the speaker ID, environmental noise, punctuation, etc.  
<https://www.nationaldeafcenter.org/sites/default/files/Why%20Captions%20Provide%20Equal%20Access.pdf>

**Can Zoom "captioning" generated from the Auto transcription feature in Zoom cloud recordings be a substitute for captions generated by our Captionsync vendor?**

No, but the Zoom transcript could be used to make an accurate transcript file.

Zoom post-recording captioning that is generated from the auto transcription feature in Cloud recordings cannot be substituted for an accommodation request, but the transcript could be used to make an accurate transcript file if the file owner is willing to edit the transcript.

**Where can I request an ASL interpreter** **or live captions for my Zoom sessions?**

To request an ASL interpreter or live captioning for events referenced below, email asl@csus.edu no later than five business days before the event and provide the name, date, time, and location of this event in the subject line, and indicate whether ASL interpretation, live captioning, or both are needed.

Note: According to the National Deaf Center: Providing interpreters to address a need to access video is not equal access, it is an accommodation, best to provide closed captioning.

**How can one check if the media is captioned properly?**

Four basic checks to look for when assessing if the captions are compliant: captions identify speakers, identify sounds, include proper grammar and punctuation (punctuation can change the meaning of the information so it's important that it is accurate to ensure the context and content are provided), what is the accuracy rate?

## Appendix

Live Captioning Services   
Otter A.I. and Zoom Live Captions (built from Otter.ai) uses artificial intelligence to generate speech-to-text captions and transcripts. Unless the captions and transcripts are 100% accurate, they cannot be used for equal access. Otter A.I. provides a transcript that can be used to generate accurate captions. The captioning and/or transcription file would have to be edited with all the proper features required to make it accurate in high priority cases.

### Captionsync

CaptionSync uses a combination of ASR and trained editors to generate captions.