I. PURPOSE & INTENT:

The University of South Florida System (the University) relies on administrators, faculty and staff to provide equal access to all programs and activities for students with disabilities. The University is committed to adhering to the requirements of Sections 504 & 508 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 as amended by the Americans with Disabilities Act Amendments Act of 2008 by providing reasonable accommodations to qualified students with disabilities. Students who are deaf, have hearing loss, or have an other disability may require Captioning or related modifications to Media used in academic courses. The University has an established Policy (Policy 0-108 Disability and Accommodations (Public/Employees/Students)) that addresses general accommodations and web accessibility; however, Policy 10-506 provides specific guidance for the use of media in course content. Pursuant to the terms of employment, University employees are expected and required to comply with Policy 0-108 Disability and Accommodations (Public/Employees/Students) and with Policy 10-506 Captioning and Access of Media Used in Course Content.

II. APPLICABILITY:

This Policy only applies to the use of Media, as defined in Section III, by Designated Instructors in academic classrooms or online delivery as graded academic content used to disseminate information. Non-media course materials delivered via live lecture (that is not recorded for future use) and via live classroom instruction and/or non-graded group discussion outside of the classroom are not included in this Policy. Students needing accommodation for classroom instruction by ASL interpreters, CART services or by Transcripts would need to apply for individual accommodations by registering with SDS and requesting such accommodation(s). In the event a Designated Instructor has pedagogical concerns with using Captioned Media, the Designated Instructor should discuss such concerns and possible alternatives with their College Dean, their department chair, or with SDS.
III. DEFINITIONS OF TERMS:


2) Alternate Assignment: If an accessible version of a Media resource is not available and accessibility cannot be assured in a timely fashion, a Designated Instructor may substitute such Media for an Alternative Assignment. Designated Instructors will determine the appropriate Alternate Assignment making an effort to parallel the Alternate Assignment to the original assignment in relation to scope, breadth and time commitment expected.

3) Alternate or Adjusted Grading: Students who do not have appropriate access to accessible Media should not be graded on the mastery of that Media.

4) Alternative Formats: Media that may be used to replace or supplement existing Media, such as selecting a DVD, transcript, or streamed content to provide options that may provide delivery of content without sound. In many instances, it may be more productive to utilize Alternative Formats. For example, it may be more affordable to buy a newer DVD (for example one produced post 2005) than to buy the Captions for an older DVD.

5) Captions: A series of words superimposed on Media sources that allows dialogue to be read and describes other important audible cues. For the purposes of access to University Media, Captions will be assumed to be in English.

6) CART (Computer Aided Real-Time Transcription): A live- and real-time transcription service typically utilized for live events and/or face to face courses.

7) Closed vs. Open Captioning: Close Captioning refers to Captions that have to be turned on via a DVD menu or a TV/computer function. Open Captions appear automatically. Both are acceptable alternatives. Open Captioning may be less expensive to produce. When Captioning is available, USF’s policy will be to show the Captions such that no individual has to request that Captions be turned on. When there are pedagogical concerns about displaying Captions, consult with SDS.

8) C-Print: A written summary of a conversation/presentation or event that is produced in-person. C-Print differs from CART because it is not word for word.

9) Days: In terms of process is defined as the normal business day and will not include Saturdays, Sundays, or legal holidays/University administrative holidays when the campus is closed for business.

10) Designated Instructors: University departments/units, administrators, faculty, staff, and/or colleges.
11) **Instructor Produced Media**: Media self-generated and/or created by an instructor of record or a University colleague.

12) **Media**: Videos/DVDs/Films/Audio Recordings and other materials where sound is a part of the educational experience.

13) **Public Domain**: Works which are not owned by someone, and therefore are not protected by copyright. No permission is needed to copy or use works in the Public Domain.

14) **Students with Disabilities Services (SDS)**: SDS is the University office designated to determine appropriate academic accommodations for students and will act as the Responsible Office on behalf of the University System Academic Affairs Offices for this Policy. Additionally, SDS will act as the liaison and guide for Designated Instructors in complying with this Policy.

15) **Subtitles**: Provide the same function as Captions. Term is frequently used on professionally produced DVDs to reflect the addition of other languages.

16) **Third-Party Media**: Commercial content that is neither Instructor Produced or in the Public Domain and must be purchased from a third-party vendor.

17) **Transcripts**: A written account/translation (word for word) of a Media resource.

18) **Transition Period**: Recognizing that an immediate full transition may not be possible, the goal of the University is to use best efforts to be fully transitioned to available, accessible Media over the course of the next seven years such that the transition will be completed by 2023. SDS is available to serve as a liaison and guide for Designated Instructors in developing a compliance plan for transitioning existing courses and existing Media to an accessible format by 2023.

IV. **STATEMENT OF POLICY**:

The University must provide academic accommodations for students as required by law. The most effective means of providing appropriate accommodation in an in-person instructional class is for students to request accommodation through SDS. The most effective means of providing equal access to Media in academic programs is through ensuring that the products ordered in new courses or new Media for existing courses are obtainable in an accessible format of equal educational content, such as Captioning, Subtitles or other accessible Alternative Format. Because Designated Instructors are responsible for selecting the Media used in their courses, they are therefore in the optimal position to ensure that the Media ordered in new courses or new Media for existing courses are accessible or, if the products are not available or feasible, to offer an accessible Alternative Format or Alternate Assignment. SDS is available to serve as a liaison and guide for Designated Instructors in ensuring immediate compliance for new courses or new Media and for developing a compliance plan for transitioning existing courses and existing Media to an accessible format by 2023. In the circumstances where there is no accessible format (including no Alternative Format) available, feasible or identified for Media,
disabled students should not be graded on such Media and Designated Instructors should find Alternate Grading methods.

V. PROCESS STEPS:

To address the options and processes that are available for specific courses and programs at the University, this Policy addresses the resources and role of SDS and specific guidelines for categories of courses as follows:

- Resources and Role of SDS:
- New On Line and New on Campus Delivered Courses, Media and Programs
- Existing courses, Media and Programs (Online and e Campus)
- Instructor Produced Media
- Alternative Formats during the Transition Period or in the event no Captioning is possible

1) Resources and Role of SDS:

The goal of this Policy is to proactively address accessibility which requires Designated Instructors to consider accessibility (including Captioning) at the inception of course design and to conduct a self-audit of selected instructional Media to determine how to ensure the best accessibility possible. To meet that goal, Designated Instructors should follow the steps outlined in this Policy. SDS will provide support as available and will continue to explore additional resources and funding to assist Designated Instructors with complying with this Policy.

2) New Online and New on Campus Delivered Courses, Media and Programs: Designated Instructors should only order new course Media which includes Captions or Subtitles.

A. New Online Courses, Media and Programs: Any educational unit or Designated Instructor initiating a new course or program in an on-line format must submit the online course or program to the appropriate distance learning office at each USF System member Institution or to USF Health for review. At USF (Tampa) (except for USF Health), the Office of Innovative Education will certify that all new courses and Media for any new on-line courses are either in full compliance with this Policy and with the Office of Innovative Education standards or not in compliance. If the course is not in compliance, Innovative Education will provide the faculty member with a checklist of what needs to be verified to be compliant for their signature of approval and for Innovative Education’s audit/record keeping purposes with periodic audits for compliance. Online courses not developed by Innovative Education will be required to be Captioned and/or transcribed and the Designated Instructor must contact Innovative Education or SDS to identify how to ensure compliance.

B. New on Campus Delivered Courses, Media and Programs (Third Party): In the event Designated Instructors intend to use new Third-Party Media in a course, it is the responsibility of the Designated Instructor to select the new Media and then purchase and use Captioned Media for teaching purposes within their particular classroom and/or department/unit. Both SDS and the University Library can assist faculty in determining if a Captioned/Subtitled version of Media exists. If an
accessible version of the Third-Party Media is not available, replace the non-accessible Media with Captioned Media. As part of the compliance plan, departments/units should plan to update all Media utilized in courses to include only those with Captioning.

3) **Existing Courses, Media and Programs (Online and on Campus):** Recognizing that an immediate full transition may not be possible, the goal of the University is to be fully transitioned to all accessible Media over the course of the next seven years such that the transition will be completed by 2023. In the event that a student who requires accessible Media enrolls in a course during this Transition Period, Designated Instructors and/or individual departments/units, as necessary, should work with Students with Disabilities Services to provide appropriate access.

   A. **Initial Steps:**

   1. Designated Instructors should evaluate existing courses to develop a phased compliance plan for existing Media (compliance plan suggestions are attached as **Attachment A**). In developing a compliance plan, Designated Instructors should determine what existing Media is most important to transition first, by considering the number of students who are exposed to a course, whether the course in question is a pre-requisite for degree completion, and the departmental/unit and individual college plan for general course updates. Consider also whether a course already contains alternate means for students to access Media (i.e. PowerPoint slides that are read aloud with all of the required material included in the PowerPoint may not need to be transcribed). Upon request, SDS will assist the departments/units and individual colleges in determining a tiered approach to making existing course Media accessible.

   2. Designated Instructors should begin to transition their Media into Captioned and accessible products by making the following efforts:

   a) Contact distributor to inquire about availability of Captioned version of the Media;

   b) Consult with the University library to inquire about availability of Captioned version of the Media through inter-library loan;

   c) Seek an Alternative Format with Captioning or Subtitles;

   d) Work with SDS to determine if a transcript is appropriate;

   e) Determine if the content of the Media is essential to the academic content of the course such that the student will be tested/graded on the subject, and if so, either delete the Media from the course assignment or offer the student an optional replacement that includes Captioning or an alternative mode of communication. If there is a cost involved with immediate replacement or securing of Media, the Designated Instructor may contact their department/unit chair to determine availability of funds and/or SDS for funds or alternatives; and/or
i). If the Media is absolutely pertinent to the essential components of the curriculum or program and no Alternative Format can be substituted; consult with SDS and the appropriate College Dean or department chair. Additionally, if a Designated Instructor has pedagogical concerns with using Captioned Media, the Designated Instructor should discuss such concerns and possible alternatives with their College Dean, their department chair, or with SDS.

ii). During the Transition Period, if ordering Captioned Media during course planning is not feasible and the Designated Instructor elects to use non-Captioned Media in a course, and a registered student makes a request for and receives accommodations for Captioned Media, the Designated Instructor must immediately make arrangements to secure the Captioned Media and work with SDS to ensure compliance with the individual accommodation. A student who has made a request should wait no more than 3 days for accessible materials. SDS may advise that a Designated Instructor offer the student alternative due dates or assignments while a student waits for accessible Media. In the event the Media cannot be secured in a timely fashion, the Designated Instructor must either provide an Alternative Assignment or Alternate Grading.

B. Funding Sources: Each institution will be responsible for determining the appropriate funding model to support compliance with this Policy. If the Media is part of a required course and a student with a disability is enrolled in that course, SDS will assist with the costs of accommodations. Designated Instructors retain the responsibility of working with SDS in a timely and prompt manner such that SDS can provide reasonable assistance. To meet that goal, it is the responsibility of Designated Instructors to transition their Media during the Transition Period into Captioned and accessible products for all by following the steps outlined in this Policy. SDS will provide support as available and will continue to explore additional resources and funding to assist Designated Instructors with complying with this Policy.

4) Instructor Produced Media: Accessibility of content produced by the Designated Instructor may be provided in a variety of ways. The author may consult with SDS and/or see the Accessibility Guide found under the resources tab at www.sds.usf.edu. Designated Instructors and/or individual departments/units, as necessary, must plan for accessibility of any University created audio and audio-visual Media and depending on the length and content, accessibility may include a transcript or Captions.

5) Alternative Accommodations for Courses, Media, or Programs That Cannot or May Not Be Obtained in Accessible Format: In the event the Designated Instructor determines non-accessible Media is essential to academic course requirements, it is the responsibility of the Designated Instructor to consult with SDS or, to refer a student to SDS, for SDS and the Designated Instructor to jointly determine reasonable alternatives. Possible alternatives include:

   A. Providing an Alternative Assignment with similar time demands if possible.
B. Working with SDS to determine if in-person interpretation (sign language) CART Services, or transcription of the Media is a viable option. If the Media is part of a required course and a student with a disability is enrolled in that course, SDS will assist with the costs of accommodations. SDS may require that the Designated Instructor provide access to Media within three (3) days.

C. Ensuring that no student with a documented disability is graded on non-accessible Media. Note: An academic grievance is only applicable if the student is registered with SDS. Consult with SDS as necessary.

1. If Captioning or transcription cannot be obtained, the student with a documented disability should not be graded on such non-accessible Media. Rather, Designated Instructors should seek alternative means of content delivery that do not include the Media requiring Captioning.

D. Outsourcing of Captioning on existing or new ordered Media: If no alternatives are available for existing Media or purchasing of new Media and Designated Instructors would like to outsource the Captioning of existing Media or order new Media, Designated Instructors may follow the Captioning Protocol listed below after receiving approval from the appropriate Dean or College representative, to have Media outsourced:

1. Each department/unit may contact the vendors by phone, email or through their website to request a quote for Captioning the Media. If the department/unit is altering an original and/or distributing it beyond the one on one disability accommodation, departments/units MUST have written permission from the video owner to request Captioning of the Media. If there is a specific student in a current course or program that needs the accommodation, the department/unit should consult with SDS.

2. Keep in mind that quotes from agencies should be obtained and submitted to the Purchasing Department and follow the purchasing guidelines.

E. If Captioning or transcription cannot be obtained, the Designated Instructor should seek alternative means of course delivery or direct the student to SDS to assist in identifying appropriate alternative accommodations.

6) Students with Disabilities Services (SDS) and Student Contact to SDS:

A. SDS and students with disabilities have the following roles and responsibilities:

1. SDS is responsible for providing guidance and assistance to the efforts for all courses, Media and programs to be accessible at the onset without regard to specific student request. Financial assistance from SDS will vary.
2. Students should contact SDS to register for accommodation and to identify the best alternatives if needed. In the event a student contacts a Designated Instructor directly, the Designated Instructor will make every attempt to direct the student to SDS. At the Designated Instructor’s discretion and in consultation with the student and SDS, the Designated Instructor may also identify if an alternative mode of delivery or interim accommodation is possible and immediately accessible and agreeable to the student.

3. When SDS is aware that an interpreter, transcriptionist or C-Print provider will be necessary, SDS will notify the instructor of record. Notification generally will be provided within three days of SDS receiving a finalized schedule or notice of need from a student; timely notification is dependent upon the voluntary disclosure by the student. SDS must provide the University community with general information regarding the accessibility of course Media. See the “Accessibility Guide” at www.sds.usf.edu.

4. When there is a student enrolled in a course and there is an imminent need for access, SDS will assist the Designated Instructor in achieving the required accessibility. Successful SDS assistance is dependent upon the full cooperation of the faculty and staff.

*Current Responsible Office: Academic Affairs (USF, USFSP & USFSM) and USF Health

*Refer to the appropriate Responsible Office website for a current name of the Vice President or other Responsible Officer.

History: New 8-18-16.
ATTACHMENT A

Creating a Compliance Plan for Compliance with the Captioning and Access of Media Policy

1. The end-goal of this Policy is to ensure the student success of all students – including those with disabilities.

2. Current disability/civil rights law require that students with disabilities have simultaneous and equitable access to Media used in academic courses. This means that USF must consider access to Media before a student makes a request. During the Transition Period, access to Media should be provided within 3 days of a student’s request.

3. Compliance with this Policy is anticipated to take several years. To meet the University targeted goal date of 2023, all departments/units should develop a compliance plan that addresses the accessibility of existing Media.


5. A tiered approach to compliance is recommended. When considering tiers, consider:
   a. How many students will take the course? Start with courses that touch the largest number of students.
   b. Is there currently a student in the course, major or sequence, who will require accessible Media?
   c. Is the course in question a pre-requisite for other courses and/or degree completion? Ensure that required courses and pre-requisites receive attention/resources first.
   d. Is the course up for revision in the next 2 years? Because accessibility will be considered as courses are revised, begin with courses that are not due to be revised in the next 2 years.

6. Indicate planned consideration of resources. Stating that resources are not available is not an acceptable option. Indicating that due to resource constraints a fixed sum of money or fixed number of student worker/graduate/faculty/staff hours may be allotted each semester may be reasonable.

7. Maintain source information and or original files for Media such that SDS can gain access to such Media in 24-48 hours in order to assist when a student requires access to inaccessible Media.

8. Consider/create alternatives to inaccessible media in advance of a stated need.
9. Consult with SDS to determine what form of accessibility is most appropriate. If a student can gain the same information/experience by reading a transcript as by watching a film or video clip, a transcript may be an appropriate alternative to Captions/Subtitles.