

University Policy: Captioning Policy

Policy Category: AU Community

Subject: This policy provides requirements for captioning of digital media online and events at American University.

Responsible Executive: Vice President & Chief Information Officer

Office Responsible for Review of this Policy: Office of Information Technology

Supplemental Documents: University Captioning Procedures

Related local and Federal Laws:

- Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 prohibit discrimination against individuals with disabilities; section 504 of the Rehabilitation Act of 1973 requires electronic and information technology to be accessible to people with disabilities; section 508 of the Rehabilitation Act Amendments of 1998 requires technology to be accessible to employees and members of the public with disabilities to the extent it does not pose an “undue burden.”
- District of Columbia Human Rights Act of 1977 (DCHRA)
- Web Content Accessibility Guidelines

Related University Policies: Responsible Use of University Websites and Content Management Systems, Responsible Use of University Technology Resources

I. SCOPE

This Policy addresses captioning requirements for all Public Facing University Events, Audio and Video Media used in University Events, and University Online Presence.

The WCAG 2.1 will be listed as the current version in the procedures document. WCAG 2.1 is the industry standard. Captioning guidelines (pre-recorded and live) are the same for WCAG 2.0, 2.1, and 2.2.

II. POLICY STATEMENT

American University is committed to the fundamental principles of equity and accessibility by providing equitable access to the University’s programs, services, and activities. The University supports an inclusive environment by incorporating design concepts that reduce or remove barriers for all. This Policy addresses the procedures for ensuring compliance with district and federal laws. American university strives to maintain current Web Content Accessibility Guidelines (WCAG); this Policy and accompanying Procedures specifically outlines requirements and procedures for ensuring the Audio and Video Media in the scope of this policy are appropriately captioned.

This policy does not supersede requirements to provide individual disability accommodations. Any requests or questions related to disability accommodations should be directed to the Academic Support and Access Center (for current students), asac@american.edu, or Employee Relations (for employees), employeerelations@american.edu.

III. DEFINITIONS

- A. **Audio and Video Media:** any audio and/or visual material with sound and/or spoken words used in any part of a Public Facing University Event or University Online Presence.
- B. **Captioning:** open or closed transcription service for Audio and Video Media.
- C. **Content/Event Sponsor:** AU department, office, academic unit, or recognized student organization sponsoring the University Event and/or University Online Presence. If captioning services are required, the Content/Event Sponsor is responsible for costs associated with these services.
- D. **University Event:** any event, program or activity sponsored by a university department, office, academic unit, or recognized student organization, excluding workplace meetings and AU courses. Students with disabilities who request accommodations for AU courses need to register with the Academic Support and Access Center and request accommodations. Employees with disabilities who request accommodations for workplace meetings should contact HR Employee Relations.
- E. **Public Facing University Event:** any event, program or activity sponsored by a university department, office, academic unit, or recognized student organization, excluding workplace meetings and AU courses, that is available for members of the AU Community (e.g., students, faculty, staff) as well as members of the general public. As a general rule, attendance at a Public Facing University Event does not require pre-registering, providing an RSVP, or receiving a specific invitation to the event. For purposes of clarity, events that are live streamed online on publicly available services, such as Facebook or YouTube, are considered to be public facing university events.
- F. **University Online Presence:** All webpages and information served from the university's domains and university-branded apps, social media channels and externally hosted sites that represent administrative and academic units of the university are considered part of the University Online Presence and must follow university policies and procedures.

IV. POLICY

- A. When using Audio and Video Media in University Events and/or University Online Presence, the Content/Event Sponsor must ensure the Audio and Video Media is appropriately captioned pursuant to the WCAG 2.0 accessibility guidelines.
- B. Content/Event Sponsor should follow the University Captioning Policy's associated Procedures to ensure accessibility and compliance with this Policy.

V. EFFECTIVE DATE AND REVISIONS

This Policy is effective January 1, 2024.