



# Tufts University Captioning Policy

## Purpose:

Tufts University is committed to providing digital environments, including videos and audio files, that are accessible to all, including individuals with disabilities. Digital environments may include but are not limited to outward facing websites, internal websites, apps, live-streamed events, previously recorded events, face-to-face courses with an online presence, online courses, online resources. Tufts' commitment to digital accessibility is grounded not only in principles of equity and inclusion, but also with the knowledge that accessible content enhances usability for everyone. Captioning specifically, is a universal gateway for a variety of users, including non-Native English speakers, visual learners, users in noisy environments, mobile users, users searching for information and for users with disabilities.

Captioning is a process of displaying text on a visual display to provide additional or interpretive information. There are two types of captions – closed and open. Closed captioning is a technique of displaying the captioned text only when it is desired and can be turned off. Closed captions typically show a transcription of the audio portion of a video as it plays (either verbatim or in edited form), sometimes including non-speech elements. Open captions are visible to the viewer at all times.

## Scope:

This policy applies to all university videos and audio files available to members of the public and members of the Tufts community. All newly created or newly posted video/audio files on official Tufts' websites on or after **June 30, 2022** must have closed captions. If captions are unavailable in a purchased or chosen file, it is the university's responsibility to determine if the file is critical for use. If it is determined that the file is needed, the university must determine if the video/audio file is essential to the university's academic, research, scholarship, clinical and/or other mission. If so, the university must post an accessibility statement and be able to provide access to the video/audio file when asked by a person with a disability.

Any video/audio file procured from a third party by Tufts must comply with the [Procurement Protocol for Accessible Digital Technology](#). If there are no accessible files but the file is deemed essential for university's academic, research, scholarship, clinical and/or other mission, the purchaser must put a [Tufts Accessibility Statement](#) on the video or audio file access page. The purchaser is responsible for providing an accessible version of the file if asked.

Official Tufts websites include the University website (tufts.edu); websites intended or positioned to communicate University, school, division, or University recognized center or institute information to the public or the Tufts community. Websites managed individual members of the Tufts community as 'personal sites' are not official websites of the University.

## Timeline:

Tufts recognizes the enormity of this policy, while also respecting the mission behind it to increase access for all to materials we provide. As such, Tufts has prioritized the captioning policy roll-out to ensure that video/audio files are being captioned to support the needs of our community as effectively as possible.

*Note on material created prior to the policy:* The dates below reflect the timeline for policy implementation. Video/audio files, including those with opened captions, posted on Tufts websites, on Apps, on social media or used for academic purposes prior to the implementation date are not covered

by this policy. However, if a person with a disability requests captioning or a transcript, the department hosting that video/audio file is obligated to fulfill that request in within 5 days of request.

- All newly created or newly posted video/audio files on official Tuft's websites on or after **June 30, 2022** *will comply* with this policy. Prior to being posted, all video/audio files must be reviewed for accuracy.
- All content acquired on or after **June 30, 2022** *should comply* with the Procurement Policy, which includes the provision of captions. Any content that does not have captions readily available must include an accessibility statement directing persons with disabilities to the appropriate resources.
- All promotional and communication materials, including public Tufts events, produced, or hosted by Tufts *will comply* with this policy, effective **June 30, 2022**. Prior to being posted, all video/audio files must be reviewed for accuracy.
- All synchronous courses and meetings using the zoom, google or other platforms with a built-in captioning feature must enable captioning effective **June 30, 2022** thereby *complying* with this policy.
- Materials essential for the university's academic, clinical, scholarship, research and/or other mission that are not posted for public consumption, *will be captioned* using automatic reliable captioning technology as it becomes available. In the absence of such technology, these materials must include an accessibility statement directing persons with disabilities to the appropriate resources.

#### Responsibilities:

It is the responsibility of all Tufts schools and divisions to utilize media products with closed captioning when the technology to do so is available or to employ automatic captioning technology as it becomes available.

#### Websites, Apps and Social Media Files:

- Owners (Tufts staff members responsible for a particular website, app, or social media account) are responsible for ensuring that the video/audio content posted is accessible. This includes utilizing automatic captioning technology when available, posting captioned content when supported by the platform or in the absence of this possibility including an accessibility statement directing people with disabilities to the appropriate resources.

#### Materials used in courses:

- Faculty are encouraged to look for captioned videos and audio files with transcripts before making final selection of course material.
- Faculty should use the built-in accessibility tools available to them for content production regardless of the modality of the course.
- Faculty will ensure that an Accessibility Statement is on their syllabus. Example:  
*Tufts University values the diversity of our students, staff and faculty; recognizing the important contribution each student makes. Tufts is committed to providing equal access and support to all qualified students through the provision of reasonable accommodations. If you have a disability*

*that requires accommodations, please contact the StAAR Center at [staarcenter@tufts.edu](mailto:staarcenter@tufts.edu) or 617-627-4539. Please be aware that accommodations cannot be enacted retroactively.*

- The academic department for which the course belongs, is responsible for covering the cost of any captioning/ transcript need within a specific course.

#### Promotional materials/ Tufts public events:

- Owners of the promotional materials, or those sponsoring a public event are responsible for ensuring that the video/audio content posted is accessible, when the technology is available. This includes finding and covering the cost of accessible versions of the file. Until the June 30<sup>th</sup>, 2022 deadline, when captioning becomes mandatory for promotional materials and Tufts sponsored public events, if captioning is not possible, these materials and events must include an accessibility statement directing persons with disabilities to the appropriate resources.

#### Exceptions:

Where compliance is not technically possible or may require extraordinary measures due to the unavailability of captions, a request for exception must be made as outlined below. Lack of sufficient funding for any unit, department, or college of the university as the sole reason for an exception will not be considered.

Units seeking an exception to this policy must submit a written request through the Captioning Exception Request Form (Appendix 2) to the Digital Accessibility Specialist in consultation with the Vice President and Chief Information Officer and the Office of University Counsel, detailing why compliance is not feasible and how the department wishing to use the video will make alternative access possible for individuals with disabilities in an equally effective manner.

#### Authority:

This policy is issued by the Vice President and Chief Information Officer with consultation as needed from the Office of University Counsel.

#### Enforcement:

If necessary, at the discretion of the university leadership or their designees, some or all non-compliant videos or audio files may be brought into compliance by designated staff or contractors at the expense of the department.

#### Questions:

Individuals with questions, comments, or concerns about this policy or any of the related procedures should contact the Vice President and Chief Information Officer.

#### Captioning Process and Resources:

See Appendix 1

#### Approval Entity(ies):

Vice President and Chief Information Officer  
Office of University Counsel

#### Approval Date:

October 21, 2021

**Effective Date:**

June 30<sup>th</sup>, 2022

**Executive Sponsor(s):**

Mary R. Jeka, Senior Vice President and General Counsel  
Chris Sedore, Vice President and Chief Information Officer

**Revision:**

The university reserves the right to change this policy from time to time. Proposed changes will normally be developed by those responsible for the policy with appropriate stakeholders. The approval entities have sole authority to approve changes to this policy.

## APPENDIX 1

### **Guidelines, Processes and Resources for Captioning Video & Audio Files**

*(Much of the material below is credited to the Penn State Accessibility Website)*

**Accuracy:**

If a department utilizes an automatic generating captioning tool, they must review it for accuracy before posting the video/audio file on official Tufts websites.

**Costs:**

All costs associated with captioning Tufts produced video/audio files created after January 1, 2022 will be assumed by the department or division that is creating or acquiring the content. All automatically generated captions must be checked for accuracy before being posted to an official Tufts website.

All purchased content should comply with the Procurement Policy. Content should be captioned prior to purchasing it at the vendor's expense. In situations, where captioning is not available, but the item is deemed critical for Tufts, the materials must include an accessibility statement directing persons with disabilities to the appropriate resources.

**Caption Training and Resources for Faculty and Staff:**

- [Access Tufts](#)
- StAAR Center [Resource for Faculty and Staff](#)

## APPENDIX 2

### Accessible Captioning Exception Request Form

Tufts University is committed to providing a digital environment that is accessible to all, captioned videos, and audio files. The following circumstances may qualify as exemptions from this policy:

1. Where compliance is not technically possible or may require extraordinary measures due to the nature or intent of the resource. Lack of enough funding for any school, department, program, or unit of the university would not be considered for an exemption.
2. Where compliance would result in a fundamental alteration of the video or audio file, and not satisfy the original intent of the digital content.
3. Where, in the case that video or audio files are procured through third party vendors or contractors; and that no captioned product is available, and the vendor is unwilling to allow or produce captioning.
4. Where the video or audio file is not currently in compliance, but efforts are underway to fix the defects by a defined date and a workaround for people with disabilities has been established.

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Your name:

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Your home school or department at Tufts

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Email:

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Description of Video or Audio file:

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The digital information is intended for (check all that apply):

- Public facing
- Internal users; students, faculty and/or staff
- Required by Tufts students
- Required by Tufts faculty and/or staff

Justification for exception (Explain why this exception is needed. Include any research you've done on other options/ vendors):

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Will the video or audio file become compliant in the future? Please detail when (month and year):

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What will be the alternative, equivalent means of access for people with disabilities (Include those from the public, students, and faculty/ staff)?

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**Technical Review:**

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Comments and review:

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Is the video/ audio file accessible?                      Yes,                      No                      Some parts are

Recommend granting exception?                      Yes                      No

Reviewer name:

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**Approval:**

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Date: \_\_\_\_\_

*The Digital Accessibility Specialist*

**Grievance Process:**

If the approval was denied but you still feel the need to post this digital information in an inaccessible format send your grievance to the Vice President and Chief Information Officer, in consultation with the Office of University Counsel. Include an explanation as to why this content must be posted, your efforts to make it accessible and the timeframe (if available) for an accessible version.