

Addendum to Guidelines for Producing Instructional and Other Printed Materials in Alternate Media for Persons with Disabilities (2000)

Publishing Information

This document was developed by the California Community Colleges Chancellor's Office based on the recommendations of the Alternate Media Workgroup established by the Disabled Student Programs and Services to provide guidance to the field on this subject.

Introduction

In 2017, the California State Auditor (CSA) undertook an audit of three California Community Colleges to evaluate the extent by which colleges were monitoring services for technology accessibility and the impact on students with disabilities. Previous guidance on producing alternate media was issued to colleges in April, 2000. While this guidance provided a comprehensive approach to alternate media solutions, it did not include formal procedures for tracking the timeliness of fulfilling student alternate media requests or include processes to monitor the performance of a college's response to such alternate media requests.

Scope and Purpose

Based on recommendations from the CSA Report 2017-102, this document augments the original guidance by clarifying the timeliness of producing alternate media, the student request process, and providing specifics on monitoring college performance related to this task.

The original guidance developed by the California Community Colleges Chancellor's Office was published as "Guidelines for Producing Instructional and Other Printed Materials in Alternate Media for Persons with Disabilities" (April, 2000). This 88-page document still serves as a resource for community college districts in meeting their legal obligation to make instructional materials and other information resources available in alternate formats to persons with disabilities.

Pertinent Legal Rulings

Several important cases have occurred since 2000 that had a guiding influence on the procedures documented in this addendum. The relevant cases are a UC Berkeley settlement (University of California, Berkeley campus and Disability Rights Advocates, 2013) and a California State University, Fullerton case (Docket Number 09-03-2166 US Department of Education, Office for Civil Rights v. California State University, Fullerton).

Conceptual Framework

Institutional Responsibility

Access for individuals with disabilities is a campus-wide responsibility shared by all faculty, staff, and administrators involved in the creation, purchase, adoption, and implementation of instructional materials and technology solutions. In alignment with Information and Communication Technology and Instructional Material Accessibility Standards and to avoid unnecessary expenses or delays in students receiving access to instructional materials and technology solutions, accessibility should be evaluated prior to purchase, adoption, or implementation. It is the responsibility of the college to educate and inform faculty, staff and administrators of their role in delivering accessible instructional resources to students.

Accessible Design

Accessible design is a design process in which the needs of all students and learning styles are taken into consideration when creating instructional materials and selecting technology. Principles of Universal Design for learning incorporate those accessibility features into the beginning stages of course design. This is a proactive approach to building broad usability for many and alleviates the need for numerous individual accommodations.

Recommended Processes for Alternate Media

Student Alternate Media Requests

1. DSP&S will offer a process for students to submit an Alternate Media Request. Such process will also allow for a request if student is enrolled in a course where reading assignments have not yet been designated or made available prior to the start of classes. DSP&S will provide assistance to students who request help in filling out alternate media requests.
2. To encourage students to turn in alternate media requests as early as possible, DSP&S will send a notification (e.g., emails, text message, phone call, etc.) titled "Alternate

Media Reminder” to all students approved by DSP&S for alternate media services. The reminder will be sent four weeks in advance of the start of classes. Each Alternate Media Reminder will inform, at a minimum, the student that:

- a. An Alternate Media Request is based on an interactive process and is necessary to enable DSP&S to meet the Standard Production Time set out in the Delivery Timelines.
- b. DSP&S will include language that assistance in completing an Alternate Media Request is available during DSP&S open hours.
- c. The student has the opportunity to register a complaint if alternate media services did not meet the student’s request.
- d. Failure to provide DSP&S with an Alternate Media Request at least three weeks prior to the start of class may mean that DSP&S is unable to provide the course textbook/reader within the Standard Production Time, but will not:
 - i. preclude the student from requesting alternate media be provided on a Rolling Basis Production;
 - ii. prevent DSP&S making its best effort to provide the alternate media within the Standard Production Time.

Delivery Timelines

Standard Production Time: The Standard Production Time for producing edited alternate media for most textbooks (whether hard copy or electronic) will take ten (10) business days from the time permission has been obtained from the publisher, and for most course readers (whether hard copy or electronic) will take seventeen (17) business days.

“Rolling Basis” Production: When a shorter turn-around time is necessary to complete a required course assignment, a student may opt to obtain portions of their textbook or course reader as needed on a “rolling basis”, rather than at the end of the Standard Production Time. Producing edited alternate media under a Rolling Basis Production request is expected to take at least five (5) business days from the time permission is obtained from the publisher for portions of a textbook and eight (8) business days for portions of a course reader. Under a Rolling Basis Production request, the college will convert portions of the textbook, course reader or other instructional materials and provide the alternate media to the student on a “rolling basis” 24 hours prior to each upcoming due date. The student will identify the date the assignment is due (e.g., by submitting course syllabus). If a due date is not shown on syllabus, written documentation of due date from instructor is sufficient. The complete textbook, course reader or other materials will be provided as soon as reasonable.

Specialized Text: Some alternate format requests will take longer than the standard production time due to the subject matter, format type, or the quality of the source material. A California Community College will make its best reasonable efforts to provide such alternate media as soon as possible. Specialized text may include:

- Subject Matter: math, science (including computer science), foreign language materials, etc.
- Paper Production: Braille or large print that requires reformatting and/or repagination
- Scan Conversion: marked-up materials or illegible document reproductions requiring extensive text input by keyboard. □

Recommended (But Not Required) Reading Assignments: Upon request, instructor recommended reading assignments will be converted into requested alternate media formats when needed for a class/course. The standard production turn-around times will not apply to recommended readings, which have lower priority than those requests for required readings. Colleges are recommended to ascertain if the request for alternate media is for required or recommended instructional materials. Upon receiving a request for recommended materials, the College will provide an estimated date of completion.

Alternate Media Request & Response Data

California Community Colleges are recommended to maintain an alternate media request/response tracking system regarding the status of a student's alternate media requests, that, at a minimum, includes the following parameters:

- date student notified to submit Alternate Media Request
- date of request received
- date student notified of receipt of alternate media request
- projected date of completion (based on the delivery timeline guidelines)
- date student notified of completion of alternate media request
- the type of source material received (e.g., scanned file, MS Word, PDF, etc.)
- the type of alternate format produced
- actual date of completion (with notation on number of business days, if any, beyond scheduled date of completion)
- time interval, in days, identifying the difference between the projected date of completion and the actual date of completion
- comments and/or notes regarding subject matter, poor quality original materials, or complexity of alternate media format, e.g., paper production of Braille or large print requiring re-formatting/re-pagination.
- actual time it took to produce alternate format materials

Monitoring of Alternate Media Requests

The Chancellor's Office recommends that data pertaining to Alternate Media Requests and Responses be reviewed not less than twice per year summarizing key data points. The underlying goal is to determine how the college is performing in ensuring students with disabilities have the same opportunity for success as other students.

Handling of Alternate Media Request and Response Complaints

Colleges are recommended to have a process for handling alternate media complaints. Information related to a complaint must be documented and include the following data:

- student contact information
- date complaint received
- date student notified of complaint receipt (within 2-business days)
- details pertaining to complaint
- projected date of resolution based on District procedures
- comments or notes regarding the complaint and resolution
- actual date of resolution
- time interval, in days, identifying the difference between the projected date of resolution and the actual date of resolution

Monitoring of Complaints

The Chancellor's Office recommends that data pertaining to Alternate Media Request and Response complaints be reviewed not less than twice per year summarizing key data points. The underlying goal is to determine how we are doing in ensuring students with disabilities have the same opportunity for success as other students. Frequent issues may become the basis for changing procedures leading to an improvement in service to students with disabilities.

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