



TO: Chief Executive Officers
Chief Instructional Officers
Chief Student Services Officers

FROM: Marty J. Alvarado
Executive Vice Chancellor, Educational Services and Support

RE: Resources & Responsibilities for Supporting Students with Disabilities during COVID-19

The COVID-19 pandemic and the required social and physical distancing has disrupted face-to-face instruction at all institutions and has required colleges to switch to online instruction. It is essential that colleges fully support students with disabilities during this crisis and assist them with the transition to online instruction. This memo reviews the obligations colleges have to ensure disabled students have equitable access to learning materials and instruction under the current emergency circumstances. To support college instruction-related accessibility efforts, it also identifies available resources to support our disabled students. Colleges should share this information with administrators, faculty, classified staff, and students.

Federal and state civil rights laws require colleges to provide services and accommodations to allow qualified disabled students to access instruction and ancillary services. Four important mechanisms, described in this memo, will help the California Community Colleges meet these obligations during the COVID-19 emergency:

- Developing distance education addenda for all courses converting to online
- Reviewing and updating Academic Accommodation Plans (AAP)
- Reviewing and updating local policies and procedures for serving students with disabilities
- Expanded access to technology support including captioning services

Distance Education Addenda

When any portion of a course is provided through distance education, a locally-approved course addendum must explain how the distance education elements will comply with the Americans with Disabilities Act and section 508 of the Rehabilitation Act of 1973. (5 Cal. Code. Regs., § 55206.) Colleges transitioning to fully online instruction were required to include this information in their Spring 2020 Emergency Temporary Distance Education Blanket Addenda. Colleges should revisit their Spring 2020 emergency addenda to ensure that the needs of disabled students will continue to be supported throughout the emergency, which may be prolonged. For the Summer and Fall, colleges are required to put all courses transitioning to distance education through their local approval process by December 2020 and ensure compliance with the applicable regulations for serving students with disabilities.

Academic Accommodations Plans

Colleges must create an Academic Accommodation Plan (AAP) that reflects an interactive process with each student enrolled in the Disabled Students Program and Services (DSPS). The AAP must address academic adjustments, auxiliary aids, services, and/or instruction necessary to provide disabled students equal access to education. (5 Cal. Code Regs., §§ 55022; 55026.) The COVID-19 emergency may create new or unique challenges for some students with disabilities related to the transition from in-person classes to distance education, or other circumstances. Colleges should pro-actively engage their DSPS students to determine whether a needs re-assessment or revised AAP is required.

Local Accommodations Procedures

Colleges receiving DSPS funding must maintain policies and procedures for responding to requests for accommodations. (5 Cal. Code Regs. § 56027.) The unusual conditions created by the COVID-19 emergency may also present issues existing accommodations procedures did not contemplate. Accordingly, colleges should review their accommodations policies and procedures to ensure that they are sufficient to meet the needs of students with disabilities during this emergency, and update them where necessary.

Support for Closed Captioning and Other Technology Resources

Applicable accessibility standards require that pre-recorded videos, recordings, and other asynchronous instruction delivered via technology, including all distance education audio content, be captioned for those students who might have auditory disabilities, or for those students who have otherwise been deemed to benefit from the captioning of audio content.¹ Prior to the COVID-19 emergency, colleges were meeting the demands for live caption and/or interpreter services based on the AAP for in-person classes, and by ensuring that all distance education audio content was captioned. Colleges must continue to meet this standard of service by providing live caption and/or interpreter services for individual students based on the AAP for live and/or synchronous instruction now being delivered online.

The Chancellor's Office provides resources for captioning services through two sources, the Distance Education Captioning and Transcription (DECT) grant, hosted by College of the Canyons, and Tech Connect (formerly 3CMedia), hosted by Palomar College. Additional funding has been secured to provide these services at no additional cost to colleges through June 30, 2020. Pending annual state budget appropriations, the Chancellor's Office plans to renew contracts with both captioning providers for the 2020-21 fiscal year, prioritizing funding to cover anticipated costs assuming social and physical distancing restrictions remain in place.

¹ [California Community Colleges Information and Communication Technology and Instructional Material for Accessibility Standards](#)

DECT Grant. The DECT grant connects colleges to [approved captioning vendors](#)² and either funds captioning services directly or reimburses colleges for captioning related expenses. An updated, streamlined application process has been implemented and colleges may access the [DECT Application and Agreement form](#) at www.canyons.edu/captioning. The cost of captioning services provided by vendors on the pre-approved list of captioning vendors are paid for directly through existing contracts. Colleges may also select a captioning vendor not on the pre-approved list to establish their own contract, and receive reimbursement for those services. Captioning services through this method are available for both synchronous and asynchronous content, however, colleges conducting live, synchronous meetings must request services in advance to ensure captioners are available and scheduled. Please contact James Glapa-Grossklag at james.glapa-grossklag@canyons.edu for questions related to these services.

TechConnect Cloud. TechConnect Cloud (formerly 3CMedia Solutions), is contracted to provide captioning resources specifically for pre-recorded instructional videos for current term distance education courses and professional development. College faculty and staff can upload self-made videos for captioning from either a free TechConnect [account](#)³ or from within a Canvas course shell. To learn more about these services or create an account visit the TechConnect Cloud website at www.ccctechconnect.org.⁴

Beyond expanded captioning support, the following resources have been made available at either a reduced cost or no additional cost to colleges.

GrackleDocs. GrackleDocs is a tool that supports community college users of Google G Suite™ in creating content that is legally accessible and in compliance with sections 504 and 508 of the Rehabilitation Act and Title II of the ADA. In support of the California Community Colleges transition to an accessible online environment, Grackle is providing their tool at no cost through June 30, 2020. Beyond June our partners at College Buys have negotiated a rate of \$500 per college for an annual subscription. For more information, please contact Graham Barker by email gbarker@grackledocs.com.

Cranium Café. Student Services staff can provide online student support services through the ConexED/Cranium Cafe platform. Cranium Café allows for online counseling with captions without having a third party present. If text to speech is turned on, it can replace the need for certain assistive technologies. The CVC-OEI can help facilitate training on the platform and previously scheduled face-to-face appointments can be converted to online via SARS or other scheduling systems. For more information, please contact support@cvc.edu.

² <https://www.canyons.edu/academics/schools/learningresources/captioning/vendors.php>

³ <http://3cm mediasolutions.org/user>

⁴ <https://ccctechconnect.zendesk.com/hc/en-us/articles/360021346953-How-To-Upload-Video-on-3C-Media>

Blackboard Ally. Blackboard Ally in Canvas provides students with the opportunity to convert and download instructional documents into alternative formats, including ePub, PDF, audio/MP3, and HTML versions. Once enabled within a college's Canvas environment, Ally will automatically add a "Download Alternative Formats" option to all documents within a course. For students with print-based disabilities receiving alternate format services, Blackboard Ally can serve as an additional resource by converting scanned files into text-based versions of documents placed into Canvas. Students can then download instructional documents in their preferred reading or auditory format. Blackboard Ally in Canvas is available to colleges at no charge through September 2020. In order to set up the Blackboard Ally in Canvas integration, contact support@cvc.edu.

Vision Resource Center. All college personnel are encouraged to visit the Vision Resource Center communities to find resources to strengthen student support, including support for students with disabilities. The Accessibility Community is now live. To access the community, [log in to the Vision Resource Center](#). Under "Connect" in the main navigation, select "All Communities." Find the title, "CCC | Accessibility." Select it, and on the next screen select the blue "Join Community" button.

Within the Accessibility Community and the COVID19 Community, you will find resources to support students with disabilities, including the sample resources linked below. Community members can also post questions and interact with others seeking answers. While some resources are specific to the COVID19 crisis, most are designed to meet your needs on an ongoing basis. Visit the Vision Resource Center at visionresourcecenter.cccco.edu or by clicking [HERE](#).

- [Guidance](#) on Accommodations for Students with Disabilities in a Pandemic (Mt. San Antonio College)
- [Example](#) emergency planning document (San Diego Community College District)
- [Comprehensive look](#) at areas of concern compiled by the Association on Higher Education and Disability (AHEAD).
- The Office for Civil Rights (OCR) short [webinar](#) on online education and website accessibility

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