

California Community Colleges Guidelines for Producing Instructional and Other Printed Materials in Alternate Media for Persons with Disabilities

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A. BASIC PRINCIPLES

The following are general principles that should be followed in ensuring that instructional materials and other information and communication technology are accessible to and usable by persons with disabilities in alternate formats.

Ensuring that instructional materials and other information and communication technology are accessible to students with disabilities is a shared college responsibility. All college administrators, faculty, and staff who are involved in the development and use of such materials or resources share this obligation. The Chancellor's Office will make every effort to provide technical support and training for faculty and staff involved in the creation of accessible instructional materials and information resources in alternative formats through the services provided by the CCC Accessibility Center.

Colleges should establish procedures for responding in a timely manner to requests for instructional materials in alternate media.

Information describing the availability of alternate media services will be readily accessible to students, faculty, and staff of the college. For example, the information should be accessible and available on the college website, in the college catalog, as well as in the Disabled Student Programs and Services (DSPS) Office. In addition, this information should be readily available upon request in alternate formats (Implementing Guidelines for Title 5 Regulations).

Whenever possible, information should be provided in the alternative format preferred by the person making the request (Americans with Disabilities Act Title II Regulations).

Colleges should anticipate that most requests for materials in alternative formats are for electronic text, braille, tactile graphics, large print, or audio and should be prepared to have the in-house capacity for producing at least short, simple documents that are free from errors in each of these formats.

The CCCAC offers college staff training in the production of these formats at no cost to the college.

Materials should be provided in a timely manner in the medium requested, or in another equally effective format, unless doing so would fundamentally alter the nature of the program or activity or result in undue financial and administrative burdens on the district. In such cases, the college must nevertheless provide an alternative accommodation that will permit the individual with a disability to participate in the program or activity to the maximum extent possible (Americans with Disabilities Act Title II Regulations).

To determine whether a proposed alternative format would be equally effective, the proposed alternative should be compared to the format originally requested in terms of accuracy, timeliness of delivery, or longevity of the material, and the extent to which the medium is appropriate to the significance of the message and the abilities of the individual making the request. Methods that are adequate for short, simple, or less important communications may not be equally effective or appropriate for longer, more complex, or more critical material.

In the event that a discrimination complaint is filed alleging that a college has failed to provide materials in an appropriate alternative format, the Chancellor's Office and the Office Of Civil Rights (OCR) will not generally accept a claim of undue burden based on the subsequent substantial expense of providing access, when such costs could have been significantly reduced by considering the issue of accessibility at the time the instructional or other materials were initially purchased.

B. SCOPE AND PURPOSE

The remainder of this document sets forth guidelines developed by the Chancellor's Office to address specific issues community college districts will face in meeting their legal obligation to make instructional materials and

other information and communication technology resources available in alternate formats to persons with disabilities.

It should be noted that the legal requirements discussed in these guidelines are not limited to students in the classroom environment. A college would be required to make available, upon request, in alternate media, any publication it offers to the general public such as the college catalog, announcements about cultural or recreational events sponsored by the college, job announcements, etc. (Americans with Disabilities Act Title II Regulations). Since most requests are likely to come from students, the primary focus in these guidelines will be on providing instructional materials in alternate formats. Colleges should, however, establish policies and procedures that take into account the possibility that others will also make such requests.

C. ESTABLISHING POLICIES AND PROCEDURES

OCR has held that it is not sufficient for a college to rely upon an ad hoc procedure for materials in alternative formats (OCR Letter: California State University - Los Angeles). Rather, policies and procedures for dealing with such requests should be developed so that requests can be handled promptly and efficiently when they do arise. Similarly, the regulations governing the Disabled Students Programs and Services (DSPS) programs require that colleges receiving DSPS funds establish policies and procedures for responding to requests for academic adjustments, including requests for instructional materials in alternate media (Implementing Guidelines for Title 5 Regulations).

The policy should identify who should receive requests for alternate media and direct other faculty and staff who may receive requests to forward them to the designated individual (Implementing Guidelines for Title 5 Regulations). Although it need not be spelled out in the policy itself, colleges should also identify in advance the person or persons at the college who will

be responsible for the actual production of alternate media or for obtaining it from outside sources. Those persons should be familiar with these guidelines, know how to produce or obtain all types of alternate media as quickly as possible, and have available the equipment, materials, and/or outside resources they will need. Policies should include methods of informing students, faculty, staff, and the general public about the availability of materials in alternate media and the process to be used to make requests (Implementing Guidelines for Title 5 Regulations). Publications and documents should contain a brief notice indicating that the material is available in alternate media and who should be contacted to obtain it (Americans with Disabilities Act Title II Regulations).

Procedures for Addressing Alternate Media Requests

DSPS will develop a process for determining eligibility for receiving alternate media services. Students with print disabilities who may be eligible for alternate media services include, but are not limited to:

- Students who are blind or have low vision
- Students with physical limitations, including paralysis, weakness, or motor impairments
- Students with learning or cognitive disabilities, such as dyslexia, or with ADD/ADHD

DSPS is typically responsible for training students on all facets of alternate media including:

- Making timely alternate media requests
- Ensuring students know how to use any tools and assistive technology
- Providing access to the material (Implementing Guidelines for Title 5 Regulations).

DSPS will offer a process for students to submit an Alternate Media Request. Such a process will also allow for a request if a student is enrolled in a course

where reading assignments have not yet been designated or made available prior to the start of classes. DSPS will provide assistance to students who request help in filling out alternate media requests.

The following should be included as part of the student's alternate format request:

- Student Name or ID number
- Title of book, ISBN, and edition
- Format of requested materials
- Course information
- Copy of course syllabus or list of chapters/pages to be converted, if not the entire book

Other information can be captured as needed by the college.

To encourage students to turn in alternate media requests as early as possible, DSPS will send a notification (e.g., emails, text message, phone call, etc.) titled “Alternate Media Reminder” to all students deemed eligible by DSPS for alternate media services. The reminder will be sent four weeks in advance of the start of classes. A sample reminder will be available from the CCCAC upon request.

Each Alternate Media Reminder will inform, at a minimum, the student that:

- Alternate Media is an accommodation provided based on an interactive process.
- An Alternate Media Request is required to meet the Standard Production Time set out in the Delivery Timelines.
- DSPS will include language that assistance in completing an Alternate Media Request is available during DSPS open hours.
- The student has the opportunity to register a complaint if alternate media services did not meet the student’s request.

- Failure to provide DSPS with an Alternate Media Request at least three weeks prior to the start of class may mean that DSPS is unable to provide the course textbook/reader within the Standard Production Time, but will not:
 - Preclude the student from requesting alternate media be provided on a Rolling Basis Production;
 - Prevent DSPS from making its best effort to provide the alternate media within the Standard Production Time.

DSPS will document format preferences as the requesting student progresses to assist the student and staff in meeting their ongoing obligations.

Standard Production Time

The Standard Production Time for producing edited alternate media that is free from errors 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 and posted documents (whether hard copy or electronic) will take fifteen (15) business days.

Rolling Basis

When shorter turnaround 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 five (5) 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 the course syllabus). If a due date is not shown on the syllabus, written documentation of the due date from the instructor is sufficient. The complete textbook, course reader, or other material will be provided in a reasonable time frame.

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 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.

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 turnaround times may not necessarily apply to recommended readings, which have lower priority than those requests for required readings. Colleges are recommended to establish 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.

Handling of Alternate Media Request Response Complaints

The district policies on handling accommodation requests should set forth the procedure to be used when the student and the DSPS or ADA coordinator

do not agree on the appropriate accommodation or the timeliness of its delivery (Implementing Guidelines for Title 5 Regulations). Students should be advised of how to go about initiating this process if the student does not accept a proposal by the college to provide material in a format different than that originally requested (Implementing Guidelines for Title 5 Regulations). If the process provided in the accommodation policy still does not resolve the dispute, the individual should be advised of his/her right to file a discrimination complaint (Implementing Guidelines for Title 5 Regulations). 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.

D. VERIFICATION OF DISABILITY AND FUNCTIONAL LIMITATIONS

Although some materials (such as the catalog) should be available in an accessible format that is conformant with WCAG 2.1 Level AA by April 2026 on demand, in most instances the process of producing alternate media will be initiated by the receipt of a request (Americans with Disabilities Act Title II Regulations). Once a request is received, the first step is to determine whether the person making the request has a disability which requires such an accommodation (Implementing Guidelines for Title 5 Regulations). Verifying the person's disability is permitted, but not required, under the ADA and

Section 504. However, with respect to serving students, verification of disability is required if the college plans to claim DSPS funds for serving the student. In addition, the DSPS regulations require a determination that the student's disability results in a functional limitation which impedes the student's participation in the educational programs and activities of the college (Implementing Guidelines for Title 5 Regulations). The student's educational limitations must be identified by certificated staff and described in the Academic Accommodation Plan (AAP) required (Implementing Guidelines for Title 5 Regulations). Eligibility for each service provided must be directly related to an educational limitation (§ 56022. Academic Accommodation Plan (AAP)). While it is important to verify that a student served by DSPS has a disability, in keeping with the 2008 amendments to the Americans with Disabilities Act, verification and documentation processes have been simplified and streamlined. It is critical to note that once a disability has been verified, the certificated DSPS staff person will need to utilize the interactive process to work with the student to identify the functional limitations in the educational environment and to determine the needed auxiliary aids, services, academic adjustments, and educational assistance classes (Implementing Guidelines for Title 5 Regulations).

Where a student requests materials in alternate media, this would require a showing that the student's impairment makes it difficult or impossible for them to read printed materials.

E. ANALYZING REQUESTS

It is recommended that colleges use the following steps as a general guide to analyzing and responding to requests for materials in alternate media. However, it must be emphasized that this is not a comprehensive or definitive discussion of how to handle every conceivable situation that may arise. Ultimately, it will be necessary to apply the legal principles discussed above to the particular facts of each case to decide what form of accommodation is most appropriate.

1. First, whenever possible, give preference to the student's choice of media.
 2. Colleges should grant requests for braille or large print, so long as:
 - The student has the training and tactile or visual acuity to efficiently use the requested material; and
 - The material is already available or it is short and simple enough to be produced on campus or through a contract supplier in a timely manner. If the student requests material in braille or large print that cannot be provided in a timely manner or would be very costly, then it would be appropriate to try to identify an equally effective substitute through collaboration between the student and the college staff person. College staff should check the California Community College Alternative Text Production Center (ATPC) website to see if the textbook is already available in the requested media or in electronic text which can be readily converted to the requested media.
- If electronic text (E-text), such as text-based PDFs, MS Word or HTML files is already available or can be easily obtained, it may be a good alternative to large print or hardcopy braille. Producing the hardcopy braille or large print will take time and could be costly, especially for voluminous material. However, in order to ensure that E-text will provide an equally effective alternative, the following must be taken into account:
 - The availability of assistive technology software permitting print magnification.
 - The availability of assistive technology providing speech synthesis.
 - The availability of a refreshable braille display.

Assuming the student has such equipment, or the college makes it reasonably available, E-text probably would be an equally effective alternative to hardcopy braille, except in situations where spatial orientation or format is

important, since such information is not readily conveyed by a refreshable braille display.

For simpler materials, or where format, punctuation, spelling, or technical detail are not crucial, a braille reader may be able to use E-text with speech output as a substitute for braille. This may even be a better alternative if large volumes of information must be read quickly, and the student will not be required to master or frequently refer to details in the text.

Many students with learning disabilities will benefit from using E-text with software which reads the text aloud while highlighting it on the screen.

In any case, the E-text will have to be free from errors and in a format compatible with the assistive technology being used to provide access. Should a college require training to produce alternate formats that are compatible with the various assistive technologies used by students, please visit the CCC Accessibility Center website or send an email to accessibility@ccctechcenter.org.

In some limited instances, the use of a reader or materials in a recorded audio format may be an equally effective alternative to either E-text or hardcopy braille or large print. This is only true where the material does not contain complex formatting and a general understanding of the material is sufficient.

An audio recording generally will not be an equally effective alternative to E-text or hardcopy braille or large print when:

- The material is complex or technical in nature.
- The student is expected to achieve detailed mastery of the information to complete a course or participate in a program or activity.
- The student is expected to quickly review material and provide an immediate response (e.g., review the material on page 57 and there will be a quiz in 10 minutes).

- The material must be used in class or as a frequent reference source outside class.

Providing an alternative that is not equally effective (e.g., a physics textbook in an audio format instead of in braille) can only be justified if the college makes a written determination that providing the requested accommodation would either:

- Require a fundamental alteration in the nature of the class or other program or activity in which the individual is involved; or
- Impose undue financial or administrative burdens.

References

"§ 56022. Academic Accommodation Plan (AAP)." 14 June 2024.

California Code of Regulations.

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