



**Federal Agencies
Digital Guidelines Initiative**

**Survey Results: The Current State of
Accessibility Features for Audiovisual
Collections Content in Five FADGI Institutions**

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The FADGI Audio-Visual Working Group
<http://www.digitizationguidelines.gov/audio-visual/>

Survey Results: The Current State of Accessibility Features for Audiovisual Collections Content in Five FADGI Institutions

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Updated: October 4, 2022

Comments or questions, email FADGI: feddigitization@loc.gov



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What is This Document?

The FADGI AV Accessibility Subgroup is focusing on guidelines and processes for federal cultural heritage institutions to address accessibility needs such as captions, subtitles, audio description and transcriptions, for archival audiovisual collections content acquired through collections development scope and policies. Subgroup members created and distributed a survey to FADGI members to gather information about accessibility compliance in federal cultural heritage institutions for *archival audiovisual collections content* acquired through collections development scope and policies. This specifically excludes audiovisual content created by the agency such as public events programming, recorded concerts, author talks, and the like. Five member organizations from two branches of the United States Federal Government, Legislative and Executive, responded with detailed responses to twenty questions. These organizations include the Library of Congress, the Smithsonian Institution, the National Archives and Records Administration, the Architect of the Capital and the National Library of Medicine.

The survey was open from late spring - midsummer 2022 and a full list of the questions is available in the Annex. Some institutions requested that their responses to specific questions be anonymized.

This document is very much a 'point-in-time' benchmark to record how five large US federal institutions are implementing accessibility features for their audiovisual collections content. It is a companion to the 2022 document, [Definitions for Key Accessibility Features for Digital Audiovisual Collections Content](#).

Federal Accessibility Rules and Guidelines Compliance

Overall responses indicate that all of the institutions are aware of the accessibility needs of audiovisual materials, and all of them indicated that they are addressing these needs specifically for cultural heritage collections materials in some ways. Three institutions simply replied that they were addressing these needs, while two specified that their current approaches are not systematic but often ad hoc, only on certain delivery platforms, or targeted as needed upon request. Both aural and visual impairments are being addressed, with a predominant focus on aural impairments.

Wading through the US Federal laws and regulations can be a complex endeavor. The next set of questions inquired about the adherence to Section 508 ([Create Accessible Video, Audio and Social Media | Section508.gov](#)), WCAG ([WCAG 2 Overview | Web Accessibility Initiative \(WAI\) | W3C](#)), or other Federal Regulations pertaining to Accessibility. Section 508 of the 1973 Rehabilitation Act, through its 1998 Amendments, outlines requirements for access to electronic and information technology in the Federal sector. Web Content Accessibility Guidelines (WCAG) is an international standard developed through the W3C process, with a goal of providing technical standards for web content accessibility. Multiple versions of the WCAG standard have been published: 2.0 in 2008, 2.1 in 2018, and 2.2 in Draft status (2022), with tiered compliance Levels A, AA, and AAA.

Out of the 5 organizations, 2 use Section 508 to guide their AV Accessibility guidance and compliance, while 1 predominantly uses WCAG Level AA. One respondent uses both 508 and WCAG Level AA as requested, depending on internal departmental guidance, and one respondent was not sure about the specifics they adhere to.

When asked if the agency follows other federal laws or mandates, for example from the FCC (Federal Communications Commission) or the CFR (Code of Federal Regulations), NARA and the Library of Congress responded yes, while the remaining organizations replied no.

Overall, this signals a wide range of application of the guidelines and regulations set by the communities, without one distinct standard taking precedence. Different Federal Organizations, even from within the same branch, are using various Accessibility standards in varying combinations to tackle this need. All five are aware of the pressing need of providing accessible content, although the implementation is at varying degrees of maturity and implementation, often without clear knowledge of the specifics in the Federal laws and without a systematic approach to doing this work, leading to a myriad of implementation details.

Implementations, Funding and Workflows

Three FADGI institutions provided details on how they implement federal accessibility mandates and policies. The Smithsonian uses WebVTT for captions, subtitles, and audio description and SRT files for captions and subtitles. Some Smithsonian content has separate video tracks for audio description. The Library of Congress has several options including the use of TTML and SRT sidecar files for content on loc.gov. The Packard Campus uses both sidecar and embedded captions in preservation and access files via WebVTT, SRT, and SCC. NAVCC's access files have all original embedded accessibility content that was present in the original file. LOC created accessibility content (such as new CCs or audio description) is added to or associated with access files as part of some access workflows, especially for content presented on the public web (loc.gov). Another institution uses a vendor to create SRT transcriptions which are then joined to the video using Camtasia. In-house staff make corrections as needed to caption file and the revised SRT exported.

Some audiovisual collections have existing accessibility features such SRTs or WebVTT files but their quality level is uneven after extraction. One institution decided not to work with the extracted SRT content because the manual review and correction took weeks to complete. The Library of Congress notes that "efforts are made to retain and transform accessibility content like captions throughout the recording's lifecycle and access copies." In general, the rule is to retain existing accessibility features if they are feasible but there is a greater emphasis on usability than on maintaining the originally submitted content.

All FADGI institutions use a combination of external vendors and in-house staff to create captions, subtitles, audio/video descriptions and transcripts.

How accessibility features are funded is a mixed bag. One institution has a small dedicated budget for transcription/captioning by an external vendor with standard turn-around (about 3-4 days per title and different per-minute charges for English [\$2.39] and Spanish [\$4.31]) but in-house staff work on quality control and finalization is not separately costed or funded. The Smithsonian reports that there is not a dedicated budget for accessibility in AV content, but accessibility is being included in more vendor contracts. Estimated costs are approximately \$15-20/min for audio description; closed captions and transcription are more varied at \$3-\$5 per

minute. The Library of Congress reports that funding and metrics are more project or collection-based rather than comprehensive. Vendors are instructed to preserve accessibility content when it is preexisting, such as embedded captions or languages, but generally they are not directed to create new accessibility content where it was not present in the original. LOC publications likely have accessibility included in vendor contracts, but archival preservation and access projects often do not."

Presentation, Access and Display of Accessibility Features

It is one thing to have content in the collection; it is another thing to present that content in an accessible way. The survey asked each institution to describe how they present the collections content with accessibility components. Each of the institutions mentioned that YouTube was used as an external streaming service. Closed-Captioning is a service provided by YouTube. Three institutions also used internal collections platforms or asset management systems to stream video or provide description. NARA's primary point of public access is the National Archives Catalog, where accessibility features are presented as text blocks or text files in item-level descriptions. The Library of Congress uses a variety of platforms, such as the loc.gov player, YouTube, the PCWA website, and VLC Media Player in reading rooms. Closed-Captioning, text transcripts (word documents, PDFs, or text surrogates) are associated with A/V content.

Four of the five institutions offer multiple platform or player options for content. The fifth institution did not respond to the question. Three institutions offered further commentary, with one institution clarifying that for the public, there is only one platform or player option: YouTube. However, for internal use, there were multiple platforms and player options. This theme of "public vs. internal" could be seen in other responses as well. For example, the Library of Congress echoed this distinction by explaining that while the LoC uses multiple platforms and players, it does not mean that the same content is available on multiple platforms. Though, if a video is on loc.gov or available in PCWA, it could also be accessible through VLC in the reading room. Likewise, NARA utilizes various platforms for public consumption such as the NARA catalog, the NARA YouTube Channel, blogs, archive.gov webpages, Presidential Library pages, Google Heritage Platform platforms, and selected third-party partner websites.

Four of the five institutions have approved players that enable toggling on and off of audio/video description. These players include: Video JS; The Able player; YouTube's Media Player; and MediaElement.js.

Given that there are different platforms and players, it begs the question if and how the accessibility requirements differ for the same content depending on the platform. NARA's practice has been to provide captions for content on its YouTube Channel and for selected items or by request on other platforms. The LoC acknowledges that the accessibility requirements vary more between the types of content rather than the platform it is shared on. For example, content created by LOC—such as webcasts of events—will always have CC, where archival collections content put online may or may not have CC or a full, accurate transcript. There are some exceptions to this. One institution had the same accessibility requirements regardless of the platform. Two institutions did not respond to the question.

At the end of the survey, institutions were asked if they had guidelines or documentation about accessibility guidelines for A/V collections content that could be shared. Three institutions answered some form of “no.” The Smithsonian Institution stated that while it was an internal document, it could be shared.

Fortunately, all five institutions confirmed they had an Accessibility Office or another group within the institution with which they could engage on such topics. NARA further embellished they had NARA General Counsel, Office of Innovation, and Equal Employment Opportunity Office.

At the end of the survey, participants were given the opportunity to share about other accessibility needs for their archival A/V collections. Three institutions expressed the wish to have content guidelines, as it seems there are no existing guidelines and/or it can be overwhelming to know where to start. The Library of Congress specifically expressed the desire to prioritize accessibility as a part of project planning and budgeting, as it is too often an afterthought for archival collection management. The Smithsonian proposed some specific areas where guidelines would be helpful, including: creating audio/video description (what should be described, how frequently should the scene be described if it doesn't change, etc.); and getting a sense of the cost for large and small projects.

Summary

FADGI institutional members have increased awareness of their legal and ethical responsibilities to provide accessibility features for audiovisual collections content. However, they remain in flux about implementation methods and workflows due to a variety of factors including the complexity of the content, limitations on approved applications and tools, system integration, staffing levels, dedicated funding and more.

Annex:

Current State of AV Accessibility for FADGI Institutions Survey Questions

Introduction

1. Agency/institution name
2. Contact email
3. Is your institution a US Federal Agency?
4. If so, which branch?
5. Do you want your answers to be anonymized in the final report?

Accessibility Rules and Guidelines Compliance

6. Currently, is your institution addressing accessibility issues for cultural heritage audiovisual collections content?
7. If yes, is the focus chiefly on accessibility for those who may have visual or aural impairments?
8. Does your agency apply Section 508 (<https://www.section508.gov/create/video-social/>) regulations to audiovisual collections content?
9. Does your agency apply WCAG (<https://www.w3.org/WAI/standards-guidelines/wcag/>) guidelines to audiovisual collections content?
10. If so, what conformance level of WCAG - Level A, Level AA or Level AAA?
11. Does your agency follow other federal laws or mandates, for example from the FCC (Federal Communications Commission) or the CFR (Code of Federal Regulations)?

Implementations, Funding and Workflows

12. What does this look like in practical terms especially for captions, subtitles and audio/video descriptions? For example, do you use sidecar files like WebVTT or SRT? Do you record audio or video tracks and combine the description information with the original audio/video in a new file?
13. Do you have audiovisual collections content that already have accessibility features such as captions, subtitles and audio/video descriptions? If so, what are they? For example, are they sidecar files such as WebVTT or SRT? Or embedded into the file? Other mechanisms?
14. Do you use external vendors or do the work in-house to create captions, subtitles, audio/video descriptions and transcripts?
15. Do you have metrics for how long it takes or how much it costs to create captions, subtitles, audio/video descriptions and transcripts either in-house or outsourced to an external vendor? Is there a dedicated budget for accessibility features for AV content? Is accessibility included in vendor contracts?

Presentation, Access and Display of Accessibility Features

16. How are you presenting the accessibility components with the collections content? Do you rely on an external streaming service like YouTube or Vimeo?

17. Does your agency offer multiple platform or player options?
18. Does your approved player(s) enable toggling of audio/video description on and off? If so, what is the player name(s)?
19. Do accessibility requirements differ for the same content depending on platform (such as streaming, online catalog, etc.)? If so, how is this handled?
20. Does your institution have guidelines or documentation about accessibility guidelines for audiovisual collections content that you can share?
21. Is there an Accessibility Office or another group at your institution with which you can engage on these topics?
22. Anything else to share with us about your accessibility needs for archival AV collections?