



POSITION STATEMENT

Free Access to High-Quality Captioning in Electronic Communications Platforms for People with Hearing Loss

Summary

The Hearing Loss Association of America (HLAA), the U.S. leader in advocacy for people with hearing loss, calls for all internet-based communication platforms to be accessible to, and usable by, people with hearing loss, and to include free (no-cost), high-quality captioning.

Background

Social engagement, connection, education, employment, and health care are basic human needs. Free, high-quality captioning is an essential way for people with hearing loss to access electronic media and to participate in everyday life. Without high-quality captioning, many people with hearing loss—who often struggle to understand speech over electronic media—would be unable to access and benefit from most mainstream communication tools.

Legal Rights

Accessibility is a legal obligation under various laws, including the Americans with Disabilities Act and Section 504 of the Rehabilitation Act, as well as state and local laws. Accordingly, people with hearing loss are entitled under the law to effective communication in many circumstances including distance learning, telemedicine, and employment-related meetings. This position statement also supports access to free, high-quality captions for all uses, including personal communication.

Defining Free, High-Quality Captions

High quality captions will be both accurate and complete while also being in sync with the audio to the maximum extent possible. The cost of providing captions should be included in the overall cost of the service with no

additional fees to access captions. The ultimate goal is for somebody who is solely reading captions to be able to fully participate in conversations.

Communication platforms should not only provide Automatic Speech Recognition (ASR) captions but also support integration of CART or ASR captions into the platform itself. Users should be able to see captions in the same window and device. Users should also be able to control the captions, that is, should be able to turn the captions on or off and be able to move the captions where they prefer to view them on the screen without reliance on the host.

For smartphone/tablet platforms (e.g., mobile devices, wireless phones, tablets, and computers that act as phones), we also recommend free, high-quality captioning. HLAA continues to support Telecommunications Relay Services but are in favor of integration of captions in applications and the devices.

Defining Internet-Based Communication Platforms

HLAA supports access to free captioning for any internet-based communication platform that offers an array of video, audio, and text communications functionality. Examples include, but are not limited to:¹

- Multiparty meeting services, such as Zoom (meetings and breakout rooms), Google Meet/Hangouts, Cisco Webex, LogMeIn GoToMeeting, and BlueJeans Meetings;
- Video and audio services built into team-based collaboration tools, such as Microsoft Teams, Discord, and Slack;
- Direct communications services including Apple FaceTime, Google Duo, Skype, Facebook Messenger, Signal, and WhatsApp;
- Multimedia social media platforms, including audio-only services such as Clubhouse and an array of related competitors;
- Subscriber services such as audio and video podcasts;
- All telehealth platforms, including, but not limited to, telemedicine platforms, tele-audiology platforms, etc.;
- All platforms that provide audio, including YouTube, Facebook story, Facebook videos, Instagram story, IGTV, Instagram Reels, Instagram videos, Twitter, Snapchat, and TikTok;
- All music streaming platforms, including Spotify, Pandora, etc. (captioned lyrics);

¹ Many of the items on this list are taken from "Comments of Accessibility Advocacy and Research Organizations," GN Docket No. 21-140 (page 4), filed June 7, 2021.

- All video streaming platforms and services, including Hulu, AMC, HBO Max, Netflix, Peacock TV, etc.;
- All Web Browsers, including Google Chrome, Safari, Microsoft Edge, and Firefox; and
- Smartphone/tablet platforms, including mobile devices, wireless phones, tablets, and computers that act as phones;
 - Within the device, Apps and Telephone Calls;

HLAA has a long history of supporting access to effective communication in educational, clinical and employment settings. We will continue to fight extensively and diligently on behalf of people with hearing loss for access to telecommunications and for the highest quality captioning across an array of electronic media, from captioned telephone services and television to internet content. For more information, go to <https://www.hearingloss.org>.

Note

This position statement is an update from the [May 2020 policy statement](#) on free access to automatic captioning for people with hearing loss during the COVID-19 pandemic and approved by the HLAA Board of Directors.

Approved by the HLAA Board of Directors on January 11, 2022.