

<b>DEPARTMENT:</b> Human Resources – Americans with Disabilities Act (ADA)	<b>POLICY DESCRIPTION:</b> External Web Accessibility
<b>PAGE:</b> 1 of 3	<b>REPLACES POLICY DATED:</b>
<b>EFFECTIVE DATE:</b> May 1, 2018	<b>REFERENCE NUMBER:</b> ADA.003
<b>APPROVED BY:</b> Ethics and Compliance Policy Committee	

**SCOPE:** All HCA Company-affiliated entities and facilities including, but not limited to, hospitals, ambulatory surgery centers, home health centers, home health agencies, physician practices, outpatient imaging centers, service centers and all Corporate departments, Groups, Divisions and Markets.

**PURPOSE:** To develop a plan that accommodates individuals pursuant to any public access provisions of the Americans with Disabilities Act of 1990 (“ADA”), Section 504 of The Rehabilitation Act of 1973 (“Rehabilitation Act”), Web Content Accessibility Guidelines AA and related statutes, regulations and/or standards by affording persons with disabilities full and equal enjoyment of healthcare and other services obtained by way of accessing the website of an HCA-affiliated entity or facility.

HCA and its affiliated entities and facilities will develop a Web Accessibility plan by applying Web Accessibility standards and implementing programming that offers alternative methods of access and enables the use of Assistive Technologies to ensure equitable opportunity to participate in and benefit from healthcare and other services.

Access by individuals, including patients and visitors, to information in a variety of media (e.g., televisions, monitors, print) within HCA facilities will be provided on an equitable basis pursuant to other accommodation policies listed in the References section below.

**POLICY:** HCA and its affiliated entities and facilities are committed to improving the accessibility and usability of their patient/customer facing web-apps, websites and mobile apps for individuals and are making reasonable efforts to ensure websites are accessible pursuant to Section 508 Web Accessibility Standards developed by the United States Access Board, as well as the World Wide Web Consortium’s (W3C) Web Content Accessibility Guidelines AA. These standards specify how HCA and its affiliated facilities ensure compliance with any applicable public access provisions of federal and state laws prohibiting disability discrimination. Recognizing the task of bringing HCA and its affiliated entities and facilities’ websites up to this Web Accessibility standard will take time and effort, HCA and its affiliated entities and facilities shall work to implement these Web Accessibility Standards.

**DEFINITIONS:**

Assistive Technologies. Technologies including, but not limited to, automated tools, keyboard-only navigation, and screen readers that enable alternative ways to experience website content.

HCA Enterprise Web Accessibility Council. A cross functional team sponsored by HCA HRG’s Cultural Development & Inclusion Center of Excellence (COE) made up of Marketing, IT&S, Content, and Legal to ensure accessibility for HCA affiliated websites.

Rich Media. Relates to video, PDF, interactive images, games, Flash, or similar media experiences on web-apps.

<b>DEPARTMENT:</b> Human Resources – Americans with Disabilities Act (ADA)	<b>POLICY DESCRIPTION:</b> External Web Accessibility
<b>PAGE:</b> 2 of 3	<b>REPLACES POLICY DATED:</b>
<b>EFFECTIVE DATE:</b> May 1, 2018	<b>REFERENCE NUMBER:</b> ADA.003
<b>APPROVED BY:</b> Ethics and Compliance Policy Committee	

Web Accessibility. The practice of constructing content, Rich-Media content, code and design of web-apps so that all individuals have equitable access to information.

Web Accessibility Standards. Guidance issued by industry experts and consortia that addresses web content accessibility.

Website Administrator/Web Developer. Any person who is responsible for the design or creation of, or revisions or updates to the website in accordance with this policy.

**PROCEDURE:**

1. Web and Content Development.  
Anyone responsible for the design or development of websites, web-apps or patient/consumer facing mobile applications and contributing to, publishing or migrating of content on such platforms will be responsible for adhering to the accessibility standards and will remedy or cause to be remedied inaccessible code, Rich-Media and content.
2. Providing Notice to Individuals Who Access HCA and Affiliates' Websites  
The HCA Enterprise Web Accessibility Council will maintain a website accessibility statement on each HCA affiliated website. The website accessibility statement includes a form to submit questions or concerns about accessibility to the Corporate Accessibility Committee.
3. Assessment of the Accessibility of the Structure and Content of an HCA-Affiliated Websites  
HCA Corporate will conduct initial and subsequent quarterly assessments of all HCA-affiliated web properties to identify the types of accessibility issues that may exist and provide reports to the Website Administrators. These include but are not limited to manual internal audits, software scans, and third party audits.
4. Implementation of Processes to Promote Accessibility of Affiliated Entity and Facility Websites  
It is the responsibility of all content contributors to ensure webpage content (includes but not limited to PDFs, videos, images, clinical documents and other files) is accessible and the responsibility of website administrators, developers and all other resources with access to HCA website production environments to update sites with accessible content and take down inaccessible content within a reasonable time frame.
5. Continued Evaluation of Accessibility of the Structure and Content of an Affiliated Entity and Facility's Website  
HCA affiliated websites will be continually evaluated and audited by Division, entity and facility Web Developers, Website Administrators, third party vendors, HCA Corporate, Legal, IT&S, Digital Marketing personnel and screen reader specialty groups.

<b>DEPARTMENT:</b> Human Resources – Americans with Disabilities Act (ADA)	<b>POLICY DESCRIPTION:</b> External Web Accessibility
<b>PAGE:</b> 3 of 3	<b>REPLACES POLICY DATED:</b>
<b>EFFECTIVE DATE:</b> May 1, 2018	<b>REFERENCE NUMBER:</b> ADA.003
<b>APPROVED BY:</b> Ethics and Compliance Policy Committee	

6. Training and Education

Corporate HCA will develop training, education and certification and will provide legal support regarding accessibility standards and best practices. HCA divisions will be responsible for ensuring relevant entity and facility personnel receive the training on an annual basis.

7. Monitoring Website Accessibility Efforts and Standard

- a. The HCA Enterprise Web Accessibility Council will monitor changes in the Web Accessibility standard and address such changes as necessary.
- b. The Council will also assess the effectiveness of this policy and modify as necessary.

**REFERENCES:**

1. [Section 508 Web Accessibility Standards](#) developed by the United States Access Board
2. [Worldwide Web Consortium's](#) Web Content Accessibility Guidelines
3. Comprehensive Accreditation Manual for Hospitals, 2000. (There is a 2019 version, should we updated this to 2019 or latest edition?)
4. Rehabilitation Act of 1973, Section 504.
5. American Disabilities Act of 1990 (42 U.S.C. 12181), including changes made by the ADA Amendments Act of 2008 (P.L. 110-325). There is a Final Rule from July 15, 2016 that was signed by Attorney General Loretta Lynch – should we include?  
<https://www.justice.gov/opa/pr/justice-department-revises-regulations-implement-requirements-ada-amendments-act-2008>
6. 28 CFR Part 36, revised as of July 1, 1994 entitled “Non Discrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities.” Should we include updates - **The following is the Department’s 1991 title III ADA regulation published July 26, 1991, which should continue to be used until March 14, 2011. The Department’s [2010 title III ADA regulation](#) published September 15, 2010, should be used beginning March 15, 2011.**  
<https://www.ada.gov/reg3a.html>  
([http://www.ada.gov/regs2010/titleIII\\_2010/titleIII\\_2010\\_regulations.htm](http://www.ada.gov/regs2010/titleIII_2010/titleIII_2010_regulations.htm))
7. HCA policies:
  - a. Access to Services, [ADA.001](#)
  - b. [Accommodating Persons Who are Deaf or Hard-of-Hearing Model Policy](#);
  - c. [Accommodating Persons Who are Blind or Have Low Vision Model Policy](#);
  - d. [Accommodating Persons with Limited English Proficiency \(LEP\) Model Policy](#)