

DEPARTMENT: Human Resources – Americans with Disabilities Act (ADA)	POLICY DESCRIPTION: Digital Accessibility
PAGE: 1 of 3	REPLACES POLICY DATED: 5/1/18
EFFECTIVE DATE: February 1, 2025	REFERENCE NUMBER: ADA.003
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE: All HCA Healthcare-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 program that accommodates individuals pursuant to any public access provisions of the Americans with Disabilities Act of 1990 (ADA), Section 504 and Section 508 of The Rehabilitation Act of 1973 (Rehabilitation Act), Section 1557 of the Patient Protection and Affordable Care Act of 2010 (ACA) , 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 digital products and digital content of an HCA-affiliated entity or facility.

HCA and its affiliated entities and facilities will develop a Digital Accessibility program by applying digital accessibility standards to design and development practices. HCA will implement processes that ensure equitable opportunity to participate in and benefit from healthcare and other services; and offer alternative methods of access.

Access by individuals, including patients and visitors, to information in a variety of media and digital content (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 public-facing digital products for persons with disabilities by making reasonable efforts to ensure digital products are accessible.

HCA has established a **Digital Accessibility Council (DAC)**, to oversee HCA’s Digital Accessibility program. Procedures for auditing, remediation, and training are documented in the HCA Accessibility Procedural Policy. The Council will provide oversight of the Digital Accessibility Program.

Digital Accessibility Standards:

For the purposes of this Policy, the Digital Accessibility Standards (or “the Standards”) are The World Wide Web Consortium’s Web Content Accessibility Guidelines version 2.2, Level AA Conformance (WCAG 2.2 Level AA) for websites, and digital applications and services. Digital products should demonstrate functional accessibility in addition to adherence to WCAG 2.2 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. HCA and its affiliated entities and facilities shall work to implement these Web Accessibility Standards.

DEPARTMENT: Human Resources – Americans with Disabilities Act (ADA)	POLICY DESCRIPTION: Digital Accessibility
PAGE: 2 of 3	REPLACES POLICY DATED: 5/1/18
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PROCEDURE:

The process for auditing, remediation, and training are documented in the HCA Digital Accessibility Procedures.

1. Digital Product Design and Development

Anyone responsible for the design or development of websites, web-apps or public 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, and digital content.

Anyone who creates, edits, manages, or purchases digital assets, content or products has responsibility for ensuring their work is accessible for people with disabilities. This may include Designers, Content Creators, Developers, QA, Project Managers, Procurement, and Legal. Business and Product Owners are accountable for ensuring their digital products and websites are accessible.

2. Providing Notice to Individuals Who Access HCA and Affiliates' Websites

The HCA Enterprise Digital 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 monitor HCA-affiliated digital properties to identify the types of accessibility defects that may exist and provide reports to the website owners. These include but are not limited to manual internal audits, software scans, and third-party audits. Refer to the Digital Accessibility Procedures documentation for more information.

4. Implementation of Processes to Promote Accessibility of Affiliated Entity and Facility Websites

It is the responsibility of business and product owners to ensure digital content is accessible. Refer to the Digital Accessibility Procedures documentation for information and guidance on implementing HCA's Digital Accessibility Policy, with supporting examples and definitions.

5. Continued Evaluation of Accessibility of the Structure and Content of an Affiliated Entity and Facility's Website

HCA affiliated websites and digital products will be continually evaluated and audited by, , third party vendors, HCA Corporate, Legal, IT&S, Digital Marketing personnel, and screen reader specialty groups.

6. Training and Education

Corporate HCA will develop training, education and certification and will provide legal support regarding accessibility standards and best practices. Digital Accessibility personnel will be

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PAGE: 3 of 3	REPLACES POLICY DATED: 5/1/18
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responsible for ensuring relevant entity and facility personnel receive the training on an annual basis.

7. Oversight of Digital Accessibility Program and Standard

- a. The HCA Enterprise Digital Accessibility Council (DAC) 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.

DEFINITIONS:

HCA Enterprise Digital Accessibility Council (DAC): A cross functional team sponsored by HCA's 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.

Digital Content: Any information or communication accessed or displayed in a digital format or medium, as text, image, audio, PDF, interactive images, kiosks, motion graphics, or video

Digital Accessibility: The practice of constructing content, code, and design of digital products so that all individuals have equitable access to information.

Digital Accessibility Standards: A set of guidelines developed by the World Wide Web Consortium (W3C) to ensure that web content is accessible to all users, including those with disabilities.

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.
4. Rehabilitation Act of 1973, Section 504 and Section 508.
5. American Disabilities Act of 1990 (42 U.S.C. 12181)
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."
7. HCA Healthcare 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](#)