



Appendix 1.8

*Accessibility
Program
Organizational
Structure*

The structure of your accessibility program will depend on your organization's size, existing departments, staff, and budget. This appendix provides guidance and examples on how to structure your accessibility program.

Disability Accessibility Coordinator

Organizations with 15 or more employees are legally required to have a Coordinator responsible for managing their organization's compliance with Section 1557 of the Patient Protection and Affordable Care Act¹ and Section 504 of the Rehabilitation Act of 1973.² Organizations with 50 or more employees are required to have a Coordinator responsible for compliance with the Americans with Disabilities Act.³ These titles and responsibilities can be combined into one role.

At least one employee must be allocated to oversee accessibility initiatives in your organization. The amount of FTE designated for the role will depend on the size of the organization and the number of responsibilities assigned to the person. Large health care organizations, for example, will likely need multiple employees to manage the accessibility program.

To be successful, the Coordinator must have training and experience in facilitating accessible care. Do not assume a person has the level of knowledge and expertise necessary to take on this role based solely on their current job title. For example, sign language interpreters do not necessarily have knowledge about physical accessibility. However, several positions may have an existing knowledge base that could help them more easily serve or be trained to serve as the Disability Accessibility Coordinator, such as:

- Civil Rights Coordinators
- Interpreter Services Coordinators/Managers/Directors
- Language Access Program Managers
- Quality Program Managers
- Program Directors for Diversity and Inclusion
- Practice Managers

Sample job titles for dedicated Disability Accessibility Coordinators include:

- 504 Coordinator/504 Officer/504 Compliance Manager
- 1557 Coordinator/1557 Officer/1557 Compliance Manager
- ADA Coordinator/ADA Officer/ADA Compliance Manager
- Disability Program Manager
- Inclusion Specialist
- Assistive Services Program Manager
- Accessibility Coordinator or Manager
- Program Manager for Facilities Compliance

Departments

When determining what department(s) will house the accessibility program and the Disability Accessibility Coordinator, consider the following:

1. How will the mission of the department influence the Program? For example, if the program exists within your Legal or Compliance Office, how might this affect its priorities and activities?
2. How does the department affect the authority or ability of the Disability Accessibility Coordinator to enact change in the organization? For example, will the Coordinator be included in regular meetings with leadership?
3. Do people within the department have the knowledge and skills to support an accessibility program?

The accessibility program could be housed within departments such as:

- Disability Resource Department or Center
- Quality and Safety
- Patient Experience/Patient Care Services
- Health Equity and Inclusion
- Clinical Operations (e.g., Ambulator Operations, Nursing)
- Compliance and Regulatory/General Counsel
- Interpretive Services

Models

There are a wide variety of models for structuring the accessibility program. In considering the model that will work for your organization, ensure you have sufficient personnel with the appropriate training, expertise, time, and resources to carry out program activities. The following are three different examples of how a health system might organize the personnel overseeing their disability accessibility activities.

Example Model #1: The Disability Accessibility Coordinator or a team lead all disability accessibility activities. These individuals will collaborate and work within all departments in their organizations to carry out disability initiatives. They are considered the accessibility experts within their organization.

Example Model #2: For large healthcare systems, a system-level Disability Accessibility Coordinator will oversee local Coordinators who work within the systems' hospitals or clinics. The local Coordinators have other job titles and responsibilities (e.g., Practice Manager), and this is just one of their responsibilities. The local Coordinators will be the staff members implementing disability activities within their hospital or clinic. They rely on the system-level Disability Accessibility Coordinator for advice and support.

Example Model #3: Accessibility activities and initiatives are divided amongst different departments. For example, someone in the legal department is responsible for federal compliance, someone in Interpreter Services is responsible for providing effective

communication to patients with hearing loss, and someone in the Patient Experience office manages disability accessibility complaints.

References

1. U.S. Department of Health & Human Services. Designation and responsibilities of a Section 1557 Coordinator. 45 CFR §92.7. 2024. <https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-92/subpart-A/section-92.7>
2. U.S. Department of Health & Human Services. Designation of responsible employee and adoption of grievance procedures. 45 CFR § 84.7(a). 1977. [https://www.ecfr.gov/current/title-45/part-84#p-84.7\(a\)](https://www.ecfr.gov/current/title-45/part-84#p-84.7(a))
3. U.S. Department of Justice. Designation of responsible employee and adoption of grievance procedures. 28 CFR §35.107(a). 2010. [https://www.ecfr.gov/current/title-28/part-35/section-35.107#p-35.107\(a\)](https://www.ecfr.gov/current/title-28/part-35/section-35.107#p-35.107(a))