



*Appendix 4.4*

*Effective  
Communication  
Policy Writing  
Guidance*

The Patient Protection and Affordable Care Act (ACA) requires healthcare organizations to create and implement an effective communication policy. The regulation states:

**“Effective communication procedures.** A covered entity must implement written effective communication procedures in its health programs and activities describing the covered entity's process for ensuring effective communication for individuals with disabilities when required under §92.202. At a minimum, a covered entity's effective communication procedures must include current contact information for the Section 1557 Coordinator (if applicable); how an employee obtains the services of qualified interpreters the covered entity uses to communicate with individuals with disabilities, including the names of any qualified interpreter staff members; and how to access appropriate auxiliary aids and services.”<sup>1</sup>

Below, we included a brief checklist to consider when developing your effective communication policy. This is not an exhaustive list. Always coordinate with your compliance and/or legal department to ensure your policy complies with applicable laws and regulations.

### Effective Communication Policy Checklist

The Health Resources and Services Administration recommends including the following in your effective communication policy:<sup>2,3</sup>

- Contact information for your Section 1557/Disability Coordinator
- Definition of who is entitled to auxiliary aids and services (i.e., people who are deaf, visually impaired, companions with disabilities, etc.)
- Examples of auxiliary aids and services that your organization has available
- How to respond to a request for services
- How long it should take to respond to requests
- Where devices (assistive listening systems, video remote interpreting (VRI) equipment, etc.) are stored
- Names of subcontractors that provide auxiliary services (interpreters, CART, Braille, etc.)
- Hours of when auxiliary services are provided
- Procedures for obtaining services last minute or during an emergency
- When it is appropriate to exchange written notes and when to call an interpreter
- Who is considered a qualified interpreter
- Language about friends, family, and third parties being unqualified to interpret
- Appropriate times and settings to use VRI

You may also consider including:

- Procedures for providing requests for auxiliary aids or services from companions or caregivers with disabilities
- How and how often the policy will be reviewed and updated for compliance

### Public Notice of Effective Communication Policy

In settlement agreements,<sup>4-6</sup> the Office for Civil Rights at the U.S. Department of Health and Human Services—the office responsible for enforcing compliance with effective communication requirements—has required healthcare organizations to post effective communication policy statements that notify patients of the availability of free auxiliary aids and services and other information.

Effective communication policy statements should be posted in both staff and patient areas. Posted notices should be in plain language, multiple languages, and accessible formats. In a model policy,<sup>7</sup> the National Association of the Deaf (NAD) recommends including the following in your statement:

- Notice that your organization provides auxiliary aids and services to ensure effective communication for free;
- Examples of auxiliary aids and services available; and
- Contact information for your Section 1557/Disability Coordinator.

This statement should be posted:

- On signs, designed in accordance with the ADA Standards for Accessible Design,<sup>8</sup> at:
  - Admitting stations;
  - Emergency departments;
  - Nurses stations;
  - Patient and visitor elevator lobby; and/or
  - Wherever a Patient's Bill of Rights is required to be posted.
- In all printings of a patient handbook or similar publication;
- On internet and intranet websites; and to
- Distribute the policy to all patient-facing staff upon their employment and on an annual basis thereafter.

**NAD Model Policy (PDF):** <https://www.nad.org/wp-content/uploads/2020/04/Model-Hospital-Policy.pdf>

## References

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6. U.S. Department of Health and Human Services, Office for Civil Rights. Resolution Agreement between the U.S. Department of Health and Human Services, Office for Civil Rights and the University of Utah Hospitals and Clinics. U.S. Department of Health and Human Services; January 8, 2010. Accessed November 18, 2025. <https://www.hhs.gov/sites/default/files/ocr/civilrights/activities/examples/Disability/uuhcra.pdf>.
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8. Civil Rights Division, U.S. Department of Justice. ADA Standards for Accessible Design. Accessed October 29, 2025, <https://www.ada.gov/law-and-regs/design-standards/2010-stds/>