


## State of Vermont Agency of Human Services (AHS)

<b>Policy Title:</b> 1.06 Accessible and Inclusive Communications Policy	<b>Revision Date:</b>
<b>Attachments/Related Documents:</b>	<b>Revision Number:</b>
<b>Name/Title of Authorizing Signature:</b> AHS Secretary Jenney Samuelson	<b>Effective Date:</b> 9/1/22

**Trauma Informed Review**

**Racial Equity Review**

<b>Authorizing Signature:</b>	
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### Policy Statement:

The Agency of Human Services (AHS) is committed to being an inclusive workplace by creating accessible communications and services for Vermonters. The purpose of this policy is to foster a human services system that employs accessibility practices and standards for the staff, individuals, and families it serves. AHS recognizes that:

- People in Vermont and its workforce have different abilities.
- An accessible workplace promotes best practices that ensure ease-of-access to documents, communications, and services to benefit all employees.
- Accessibility can mean something different for each individual and requires flexibility and creativity wherever possible. Maintaining compliance with well-established standards help to ensure that many of the relevant aspects of accessibility are addressed.
- Clear communication about accommodations and how to access or request them is an essential part of an inclusive workplace.
- There are basic measures that AHS can embed in practice to greatly increase access for those with varied abilities.
- Accessibility practices are essential for people to successfully utilize services and function in the work environment.

- Reducing barriers to accessing services can greatly affect the lives of employees and members of the public alike.
- Supporting those with diverse abilities, backgrounds, and lived experiences greatly benefits an organization and the people within it.

AHS and its departments shall adopt and implement protocols and standard operating procedures that ensure compliance with accessibility standards and promote inclusivity through its communications, services, and interactions. AHS shall also provide training to staff on specific guidelines and best practices that can be employed to create an accessible environment.

AHS aims to present information that is accessible, inclusive, and culturally appropriate for all Vermonters, including State employees. AHS shall fulfill its missions of public service through approachable communication with others, treating people with dignity and respect, honoring cultures, and supporting equitable access to all Vermonters.

This policy creates a structured, Agency-wide approach to ensuring ease-of-access for Vermonters and State employees alike, and provides employees with guidelines to create accessible workplaces, communications, and services.

## **Background:**

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The [Americans with Disabilities Act \(ADA\)/Americans with Disabilities Amendment Act \(ADAAA\)](#), [Section 504](#) and [Section 508](#) of the Rehabilitation Act of 1973, and [21st Century Communications and Video Accessibility Act \(CVAA\)](#) and other Federal law address different aspects of accessibility. These laws require reasonable accommodations and equitable access to information.

Services and systems within each department must meet the needs of individuals (including staff) who require accommodations to provide access to communication. As such, AHS recognizes that every person's needs are different, and the Agency must actively work to effectively meet individuals' needs.

AHS must work to reduce obstacles and barriers that are presented to people when services, information, or resources are not designed to be easily understandable. Limiting people's ability to access services can prevent them from reaching their potential in health and well-being. AHS must ensure compliance and design documents, systems, and communications that are accessible to all individuals served by the Agency.

When people cannot easily use systems and information, they may feel overwhelmed, which can lead to causing traumatic experiences. AHS shall communicate with people and build systems to lessen trauma in alignment with the AHS [Trauma Informed System of Care Policy](#). This Accessible and Inclusive Communications Policy is informed by the AHS Trauma Informed System of Care Policy and [State of Vermont Accessibility Policy](#).

## Scope:

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Providing equitable access through physical environments, written and oral communications, and agency services is a tenet that applies to all AHS Departments, offices, and designees in all aspects of their work. The agency must create and provide accessible communications and design systems and spaces for everyone.

Departments must take steps to:

- Clearly define how to request accommodations and promote what accommodations are readily available to people who need them.
- Communicate options clearly and with as much notice as possible.
- Remain as flexible as possible to consider reasonable accommodations when working with people.
- Ensure communications, training, and information comply with the [AHS Accessibility Minimum Requirements](#).

## Definitions:

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**Accessible:** to be able to easily get into, use, or obtain a product or service.

**Accessibility accommodations:** are reasonable accommodations that are legally required to be made for a person who requires or requests one. These may include, but are not limited to, changes to files, formats, communications, buildings, systems, and services. Examples include a training attendee who requires Sign Language interpretation or a client who requests their files or materials to be provided in electronic rather than printed format. Each request may be different based on the person's needs.

**Accessible communications:** use features, styles, formatting, and accessible practices to make our communications easy for people to understand.

**Accommodations:** changes to the way work is usually done so that more people can participate. The Americans with Disabilities Act (ADA)/Americans with Disabilities Act (ADAAA) Title II and III require that accommodations be provided that are reasonable. Every person's needs are different, which means accommodations will vary based on the individual needs identified by the requester. Accommodations are often placed into two categories, employee accommodations and accessibility accommodations.

**Employee accommodations:** are reasonable accommodations employers are legally required to provide for employees to perform the essential functions of their position. This could include, but is not limited to, software or assistive technology that will enable the individual to participate in activities and meet their job expectations. Employee requests for accommodation(s) are administered by the Department of Human Resources (DHR) and coordinated with the employee's supervisor. Please refer to the [DHR Employee Reasonable Accommodations Page](#) for more information.

**Equitable access:** a system in which the delivery of services provides everyone the same opportunity to access services or information in a way that is helpful to them. Equitable access is designed to reduce inequities by eliminating barriers some individuals or groups may otherwise experience in obtaining services.

**Cultural humility:** to think carefully about how one's background can affect how they will work with people with diverse backgrounds. Cultural humility is a process of self-reflection and discovery to build honest and trustworthy relationships, whereby the individual not only learns about another's culture, but starts with an examination of their own beliefs and cultural identities.

**Trauma-informed care or services:** a strengths-based service delivery approach that is grounded in an understanding of and responsiveness to the impact of trauma, that emphasizes physical, psychological, and emotional safety for both providers and survivors, and that creates opportunities for survivors to rebuild a sense of control and empowerment. AHS uses the definition within [the AHS Trauma Informed Policy Definitions Page 3](#)

**Plain language:** communication that is visually inviting, logically organized, and an audience can understand the first time they read or hear it. [Home | plainlanguage.gov](#).

**Plain writing:** the term "plain writing" means writing that is clear, concise, well-organized, and follows other best practices appropriate to the subject or field and intended audience, as defined in Plain Writing Act of 2010 [PUBL274.PS \(govinfo.gov\)](#). Written communications should be written to be understood.

**Reasonable Accommodations:** Reasonable accommodation is defined as any change that does not present an "undue financial or administrative burden." A reasonable accommodation would allow a qualified individual with a disability to perform the essential functions of the job and enjoy equal employment opportunities. What makes an accommodation request unreasonable? Unreasonable accommodations alter requirements that are essential to the program of instruction or to meet licensing prerequisites, cause fundamental alteration in the nature of the program, impose undue financial or administrative burden, or pose an appreciable threat to personal or public safety. For questions related to accommodations, contact your [Department of Human Resource Representative](#).

**Universal design:** the act of creating something in a way that everyone can use, to the extent possible, without extra help or accommodations. Universal design should be considered when creating any communication (electronic or printed), making building designs or modifications, and offering services or programs to staff and the public. The guiding principle is that individuals with varied abilities deserve equitable access to space and information. This is a proactive approach to inclusive design.

## Guidelines:

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To create an inclusive and accessible environment, AHS and its departments shall ensure that **minimum accessibility requirements, in accordance with the [AHS Accessibility Guidelines and best practices](#)** are met in all communications, meetings, trainings, and in-person interactions. These guidelines are found on the [AHS Accessibility Intranet Page](#).

## Accountability

- This policy and associated guidelines shall be promoted across the Agency via leadership communication channels and meetings, staff trainings, and other professional development opportunities.
- A training and monitoring plan shall be developed to ensure full implementation of this policy.
- Each department shall develop and implement a protocol to review and update any active communications and materials to comply with accessibility standards.
- Departments shall embed accessibility skill building in onboarding plans and embed best practices for accessibility in job expectations.

## AHS Accessibility Committee

In accordance with this policy, and to promote its implementation and training requirements, AHS establishes the AHS Accessibility Committee to be commissioned by the Agency. Each department shall designate at least one individual to serve on the AHS Accessibility Committee and act as a departmental liaison for the committee. This Committee shall report to the AHS Chief Operations Officer.

The Committee shall:

- Identify accessibility gaps and areas where accessibility practices can be employed to ensure effective communication to everyone.
- Identify training needs and provide access to training and resources to strengthen staff's proficiency in accessibility practices. Training opportunities shall be identified, based in best practice, and made available with focus on the following:
  - Working with and interacting with people with varied abilities.
  - Best practices for accessibility based on function and format.
  - Appropriate and common terminology.
  - Core competencies of accessible and inclusive practices.
  - Support and training in creating accessible electronic and physical communications.
  - Supporting employees with varied abilities, the process for accommodation requests.
  - Supporting clients, customers, and event attendees.
  - Prioritizing accessibility through universal design.

- Develop evidence-informed resources for AHS staff to support employing accessibility practices, including desk aids, resource page on AHS intranet, etc.
- Collaborate with other State of Vermont agencies and departments whose guidelines and policies impact the way in which AHS can successfully implement accessibility standards.
- Provide consultation to the AHS Policy Committee in drafting, review, and implementation of agency-wide accessibility-related policies.

### Department Responsibilities

Each Department shall be responsible for ensuring that the following areas are addressed within their respective department:

- Assist the implementation and support of the accessibility training plan.
- Develop and manage departmental efforts to update or review information and documents with accessibility in mind.
- Collaborate with and inform the AHS Accessibility Committee on accessibility issues and identify training gaps.
- Ensure department publications and communications are compliant with accessibility standards.
- Identify subject matter experts within their department to function as **accessibility points of contact and content experts**. These staff shall also help the AHS Accessibility Committee identify accessibility issues, barriers, and knowledge gaps.
- Support employees with accessibility compliance, and ensure contracted services align with policy and guidelines.

Professional development opportunities shall be based in best practice and the following training shall be made available:

- For all AHS staff:
  - Identify and evaluate knowledge gaps or skill deficits related to job functions and accessibility practices.
  - Working and interacting with people with varied abilities.
  - Best practices for accessibility based on function and format.
  - Appropriate and common terminology.
  - Core competencies of accessible and inclusive practices.
- For administrative staff, subject matter experts, and points of contact:
  - Support and training in creating accessible electronic and physical communications.
- For managers and supervisors:
  - Supporting employees with varied abilities, the process for accommodation requests for employees, clients, customers, and event attendees, and prioritizing accessibility through universal design.

## References:

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### **Consumer Grievances**

Vermonters who believe the Agency or its departments did not provide fair treatment or access to accommodations, can file an official grievance. This process is described in [Americans with Disabilities Act \(ADA\)/ ADA Amendments Act \(ADAAA\) Grievance Procedure Vermont Policy 10.2](#).

Additional information on nondiscrimination and AHS's grievance policy can be found in the [AHS Nondiscrimination Policy/Grievance Policy 1.11](#).

### **Employee Accommodation Requests and Grievances**

For employee accommodation requests, contact your Human Resources Representative.

[HR Field Rep Locator](#)

### **Employee Support**

AHS shall provide in-depth resources to help employees with providing accessible communications and events across the Agency.

[AHS's Desk Aids and Guidelines: AHS Accessibility Intranet Site](#).

## Appendix:

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### **Guidelines, Desk Aids, and Processes**

[AHS Accessibility Guidelines and Resources Page](#)

For assistance with accessibility training, creating accessible communications, or further information, or feedback contact the Department Accessibility Representative.