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community.  
**Secure  
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# Obligations of Vaccine Providers

**SC Disability  
Vaccine Access**  
NETWORK

**able**  
SOUTH CAROLINA



## Obligations of vaccine providers

Guaranteeing equitable access to the COVID-19 vaccine is the responsibility of vaccine providers. Vaccine providers must ensure that adults and people with disabilities can properly be served upon their arrival at its facility to receive a COVID-19 vaccination. Vaccine providers must be prepared and ready to accommodate a person's needs upon request. Here is guidance on how to better prepare and meet these obligations.

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### Use a patient-driven approach

It is imperative that individuals with disabilities make their own decisions when accessing and maintaining their own healthcare. The patient or individual with a disability should be given opportunities to express their needs and wants concerning their vaccination status. Disabled individuals should be allowed to express ideas, thoughts, and suggestions for what would best assist them. Listen to the individual.

## Learn your obligations as a healthcare provider

Medical providers have requirements under disability rights laws to ensure equitable access to healthcare for patients with disabilities. Covered healthcare facilities include, but are not limited to: hospitals, doctors' offices, pharmacies, dentists' offices, acupuncturists' offices, etc. These laws include:

- **Title II of the Americans with Disabilities Act (ADA)** prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities. This includes all state and local health departments. This also includes all state executive agencies, courts, legislatures, towns, cities, counties, school districts, universities, community colleges, water districts, special purpose districts, regional transit authorities, and other state and local government instrumentalities.
- **Title III of the ADA** ensures that people with disabilities must be able to obtain or enjoy the same goods, activities, services, and benefits that are available to other members of the public. This includes public spaces that may be used for temporary or pop-up vaccine sites such as schools, recreation facilities, and medical offices or facilities.
- **Section 504 of the Rehabilitation Act:** "Recipients of federal financial assistance are prohibited from discriminating in all programs and activities, on the basis of disability. Pharmacies, therefore, may not discriminate against pharmacy customers on the basis prohibited by Section 1557 and Section 504—including with regard to supplying medications; making determinations regarding the suitability of a prescribed medication for a patient; or advising patients about medications and how to take them.
- **Section 1557 of the Patient Protection and Affordable Care Act:** "Recipients of federal financial assistance are prohibited from excluding an individual from participation in, denying them the benefits of, or otherwise subjecting them to discrimination on the basis of sex and disability, among other bases, in their health programs and activities."<sup>2</sup>

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### 3

## Ensure accessible communications

People living with vision, hearing, speech, or cognitive disabilities communicate in a variety of ways. By making your communications accessible, you are welcoming those with “communication disabilities” into your medical practice. By communicating accessibly, you are ensuring as many people as possible can access the information you provide.

Examples of accessible communication include plain language, alternative formats such as braille, large fonts, and closed-captioning. Materials should be provided in formats readily accessible to screen readers and/or screen enlargement applications. Additional communications formats include American Sign Language, inclusive language, trauma-informed communication, and other audio formats.

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### 4

## Partner with community organizations

Develop relationships with disability-led organizations that represent and serve people with disabilities to better anticipate community needs and learn access needs. It is imperative to have individuals with disabilities speak for themselves when requesting assistance. Do not allow family members, friends or personal care attendants to make all the decisions. Disabled people know how to best meet their needs.

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### 5

## Publicize using diverse methods

When publicizing your services through advertising online or social media, also use more traditional channels such as newspapers, radio, and TV to increase your reach and the size of your audience.



## Establish accessible vaccine appointments

- Assign a staff member with the responsibility of ensuring access and accommodations for those who need them.
- Give patients options when scheduling appointments.
  - » Scheduling via phone, in person with a receptionist, online, via email, or via text message.
  - » Offer drop-in hours.
- Allow patients to complete paperwork at home or in the office (digital formats and other alternative formats may also be needed).
- Offer extended appointment times to ensure all patient needs are met.
- Ensure client questions and concerns are fully addressed and answered.
- It is imperative to document informed consent for those who have a healthcare proxy.
- Information regarding the vaccine and potential side effects and contact information should be available in various accessible formats.
- Offer assistance with scheduling the second dose of the vaccine or booster shots.
- According to the ADA, an accessible vaccine location must:
  - » Provide information and directions in an accessible format before or during the event. Accessible formats may include pictures, visual schedules, or other supports.
  - » Allow people with disabilities to arrive at the site in the same transportation methods as other people.
  - » Ensure that all spaces are accessible, including public restrooms, telephones, water fountains, shelters, first aid stations, and other common amenities.
  - » Provide accessible parking (one spot for every 25), loading zones and clearance.
  - » Ensure that pathways use accessible routes, curb ramps, and slip-resistant surfaces.
  - » Make sure that entrances are zero-level (flat) entry or have stable ramps that are 36" or wider.
  - » Create spaces with a 60-inch turning radius for wheelchair users to turn easily throughout the event area.
  - » Remove any objects in the event space that would create a stumbling or tripping hazard.
  - » Make sure that all elevators meet ADA specifications.
  - » Use raised letters and Braille on signs.

# Reminders

- 1 Every person is different and their needs will vary.
- 2 Accessibility is an ongoing process but is beneficial to everyone.
- 3 Consult disability-led organizations like Able South Carolina.

Visit

[SCDisabilityVaccine.org](https://SCDisabilityVaccine.org)

for additional information on how to make your vaccine site accessible.

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## Sources

- 1 Centers for Disease Control and Prevention <https://www.cdc.gov/vaccines/covid-19/clinical-considerations/older-adults-and-disability.html>
- 2 Health and Human Services <https://www.hhs.gov/civil-rights-for-individuals/special-topics/reproductive-healthcare/pharmacies/guidance/index.html>
- 3 Healthcare and the Americans with Disabilities Act <https://adata.org/factsheet/health-care-and-ada>