



**U.S. Department of Homeland  
Security**

**Office of Public Affairs**

**Plan for Improving Access for Individuals with  
Disabilities to Office of Public Affairs Public-Facing  
Programs and Activities**

**September 2024**

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## **I. Introduction**

The Department of Homeland Security (DHS) Office of Public Affairs (OPA) developed this plan to strengthen nondiscrimination for individuals with disabilities encountered and served by OPA pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504). On September 25, 2013, the Department of Homeland Security (DHS) Under Secretary for Management issued DHS Directive 065-01, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)*. Among other things, the Directive requires each DHS Component to designate a lead Disability Access Coordinator (and supporting Coordinators where needed), conduct a Self-Evaluation of its programs and activities to identify barriers and gaps in ensuring access for individuals with disabilities, and develop a Component Plan to address the results of the Self-Evaluation. OPA appointed a disability access coordinator, conducted a Self-Evaluation and began to take immediate steps to address barriers and gaps that were identified through the Self-Evaluation. This document is OPA's Component Plan.

## **II. Executive Summary**

Pursuant to DHS Directive 065-01 and the accompanying Instruction 065-01-001, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)*, OPA conducted its self-evaluation between April – June 2023. OPA used the Self-Evaluation tool contained within the Component Self-Evaluation and Planning Reference Guide to conduct interactive discussions with staff. The results of these discussions indicate that staff possess a clear understanding of the obligation to provide access for individuals with disabilities in public facing activities. Despite this awareness, the results of the Self-Evaluation also indicate a need to develop written policy and guidance and subsequent staff training to improve consistency in how OPA achieves accessibility to its programs and activities.

The results of the Self-Evaluation identified the following gaps and barriers to accessibility:

- The need to update OPA's policy – DHS Public Web Strategic Plan – to include disability access provisions;
- The need to ensure disability access for members of the public involved in national level exercises and other public facing activities; and
- The need to ensure that all communications specialties described below are accessible.

The Self Evaluation also indicated that no complaints have been filed against OPA for failure to provide reasonable modifications to members of the public over the last three years.

OPA is committed to ensuring nondiscrimination based on disability in its conducted programs and activities.

### **III. Component Plan to Address Barriers and Gaps**

#### **A. Responsible Staff**

OPA Lead Disability Access Coordinator (DAC): Chief of Staff, OPA.

Responsibilities: Works with representatives across OPA to serve as the central resource for OPA's compliance with Section 504; coordinates OPA's implementation of DHS Directive 065-01 for its own programs and activities, including completing the Self-Evaluation, and preparing and carrying out the OPA plan.

The DAC consults and coordinates with the Office for Civil Rights and Civil Liberties (CRCL) when needed to obtain guidance in obtaining reasonable modifications for meetings, and the Customer Experience Directorate, Accessibility & Language Services Division to obtain auxiliary aids and services and to ensure that electronic communications with members of the public are accessible to individuals with disabilities.

#### **B. OPA Overview**

OPA is responsible for oversight and management of all external and internal communications for the Department of Homeland Security. OPA assists the Secretary on all communications matters, both internal and external. OPA also provides oversight, coordination, and guidance to all DHS component public affairs offices.

OPA is the primary point of contact for news media, organizations, and the general public seeking information about the Department's programs, policies, procedures, statistics, and services.

In the event of a national emergency, OPA serves as the federal government's lead public information office. During emergencies, OPA provides potentially life-saving information to the public in a timely and accessible manner.

OPA has a complement of communications specialties, described briefly below.

- Communicate the Department’s operational and policy successes to the American people;
- Provide strategic counsel to senior leadership using best practices for communication of public information;
- Educate and empower residents of the United States to prepare for and respond to emergencies, including natural disasters and terrorist or domestic violence attacks;
- Foster employee communications and build commitment to the Department’s mission among all employees;
- Manage the daily operations of the headquarters website to provide a consolidated resource for priority topics in a unified voice;
- Provide governance policy direction and management oversight of the agency’s enterprise public websites and social media accounts;
- Regularly provide current/updated subject matter expertise and communication materials to key stakeholders and non-government partners necessary in supporting DHS’ mission objectives.
- Create, produce, and disseminate high-quality and accessible video productions to clearly communicate messages to an intended audience; and
- Provides access to DHS and its component agencies to multimedia studios/networks/productions.

Detailed information about OPA is available at: [Office of Public Affairs | Homeland Security \(dhs.gov\)](#)

### C. Program Interactions

During the initial stages of the Self-Evaluation, the OPA DAC reviewed the following functions in OPA as public facing activities:

- Incident Communications
- Web Communications
- Strategic Communications
- Speechwriting

- Press Office

#### D. Addressing Existing Policy Gaps and Barriers

DHS Directive 065-01 established a policy that affirms the Department of Homeland Security's commitment to the nondiscrimination obligations of Section 504, which applies to all OPA-conducted programs and activities.

1. OPA will ensure nondiscrimination based on disability in its conducted programs and activities, and will provide equal opportunity for qualified individuals with disabilities served or encountered in its conducted programs and activities through;
  - a. Program accessibility, including by providing equal opportunity to access programs, services, and activities and delivering these in the most integrated setting appropriate to the individual's needs;
  - b. Physical access – in accordance with the Architectural Barriers Act of 1968 (as amended) and the Department's Section 504 regulations; and
  - c. Effective communication, including by providing auxiliary aids and services for persons who are deaf or hard of hearing or blind or have low vision, and by modifying practices and materials to ensure effective communication with persons with intellectual or developmental disabilities.
2. OPA will provide any necessary modifications to afford a qualified individual with a disability the ability to fully participate in the meeting or activity, unless modifications of policies, practices or procedures would fundamentally alter the nature of the program, service, or activity or result in undue financial and administrative burdens to OPA.
3. OPA will identify the need for reasonable modifications through various communication protocols, such as Federal Register notices and electronic meeting notifications. When ensuring effective communication with individuals with disabilities, it is the policy of OPA to give primary consideration to the auxiliary aid requested by the individual with the disability.

For more information about the nondiscrimination obligations of Section 504 and about DHS Directive 065-01, please visit [Disability Access | Homeland Security \(dhs.gov\)](#)

#### E. Program Accessibility

Listed below are the OPA methods to improve access to activities for individuals with disabilities in the most integrated setting appropriate.

- Ensure meetings are accessible for attendees who are deaf or hard-of-hearing, OPA's designated conference platforms (e.g. Zoom/TEAMS), will leverage Live CART captioning which it will arrange through the Accessibility & Language Services Division.

#### F. Interaction Procedures/Protocols

Listed below is the OPA process for modifying existing or developing procedures or protocols to improve access for individuals with disabilities encountered or served by OPA:

- OPA will adopt for use CRCL's Guide to Interacting with People who have Disabilities ([Disability Access at the Department of Homeland Security | Homeland Security \(dhs.gov\)](#)) for all employees;
- OPA will also direct new staff to the DHS Disability Access web page for additional resources if needed ([Disability Access at the Department of Homeland Security | Homeland Security \(dhs.gov\)](#)); and
- OPA will conduct annual training in coordination with CRCL for all staff to ensure they are abreast of any new compliance requirements related to DHS Directive 065-01 and Section 504.

#### G. Reasonable Modification Policies/Procedures

Listed below is OPA's plan for modifying existing or developing new policies and procedures for providing reasonable modifications to qualified individuals with disabilities should a request be received.

- Creation of a documented procedure that will include the reasonable modification process for individuals with disabilities who interact with OPA through its public-facing programs and activities. This will be similar to the existing reasonable modification process established for members of the public by CRCL.

- An introduction and overview of OPA’s obligation under Section 504 of the Rehabilitation Act to ensure equal access to public-facing programs and activities for individuals with disabilities.
- Information on the interactive process and how it relates to the provision of reasonable modifications.
- A description of the process to be followed when a request for a reasonable modification is received.
- Identification of key staff who will assist in obtaining a reasonable modification; and
- A method of tracking all requests for reasonable modifications received and how each request is handled.

## H. Auxiliary Aids and Services Policies/Procedures

Listed below is OPA’s plan for modifying existing or developing new policies and procedures to furnish auxiliary aids and services to ensure effective communication for qualified individuals with disabilities.

- Issuance of guidance to OPA employees on conducting accessible meetings. This guidance will include:
  - A list and description of various types of auxiliary aids and services;
  - The steps to obtain these aids and services; and
  - A list points of contact within the office who may be of assistance in obtaining these aids and services.

## I. Dissemination of Policies and Procedures

Listed below is OPA’s plan to make resources related to DHS Directive 065-01 more readily available to OPA personnel.

- Materials will be disseminated to OPA staff electronically. These will include:
  - DHS Directive 065-01; and
  - The link to the DHS Disability Access web site hosted by CRCL ([Disability Access | Homeland Security \(dhs.gov\)](#)).

## J. Training

OPA will take the following steps to provide training to staff:



- OPA staff will be provided information on who the lead Disability Access Coordinator is and how to contact them.
- OPA will ensure all staff receive training on the use of auxiliary aids and services as necessary.

#### K. Notification to the Public

OPA will ensure that all materials and applications on dhs.gov will be Section 508 compliant by coordinating with the Accessibility and Language Services Division. Meeting notices will contain a tag line, informing those invited about how to request reasonable modifications. Language for the tag line will be similar to the following: “If you require a reasonable modification or a disability-related aid or service, please contact [POC] no later than [date].

#### L. Resources

OPA is committed to providing the resources necessary to ensure compliance with Section 504 and implementation of this plan with respect to individuals with disabilities OPA encounters and serves. OPA will provide any necessary modification to afford a qualified individual with a disability full access to participate in a meeting or teleconference, unless modification of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial and administrative burdens to OPA.

#### M. Implementation Steps

OPA intends to carry out the action steps contained in sections E-L above within the implementation period of six months following publication of this Plan. In addition, immediate actions to address policy gaps and barriers identified in the OPA’s Self Evaluation include:

- Updating the DHS Public Web Strategic Plan (will update within the next 90 days).
- Ensuring that all OPA staff are aware of how to obtain CART captioning from the Accessibility & Language Services Division. This will be effective immediately.
- Ensuring that all OPA staff are aware of the need to add a “tag line” providing information about how to request a reasonable modification to all invitations to public events. This will take effect immediately.
- Adapt CRCL’s Guidance for Conducting Accessible Meetings for use by OPA. This will be effective within the next 30 days.
- Responsible staff: OPA DAC will be responsible for actions above.

## **APPENDIX A**

### **OPA Public-Facing Programs and Activities**

- Incidents Communications
- Web Communications
- Strategic Communications (Speechwriting and social media)
- Press Office Functions