



VCA Accessibility Handbook for Grantees

Welcome! This handbook will guide arts administrators in Virginia through accessibility – whether it’s a part of your legal requirements, a grant paid from the National Endowment for the Arts (NEA), or your choice to welcome people with disabilities. If you have federal funding, this guide can prepare you to complete a 504 self-assessment and appoint an access coordinator as required by the Rehabilitation Act of 1973; for other readers, this guide can help you make your arts programming and performances more accessible to all Virginians.

The information in this guide is not comprehensive – access comes in many ways. To help you learn more, we included a wide range of links, documents, and information from our friends and partners.

The Virginia Commission for the Arts (VCA) believes that all Virginians have the right to experience the arts, and we hope this guide can serve as an effective resource for any of our constituents. If you have questions, comments, or suggestions, please contact:

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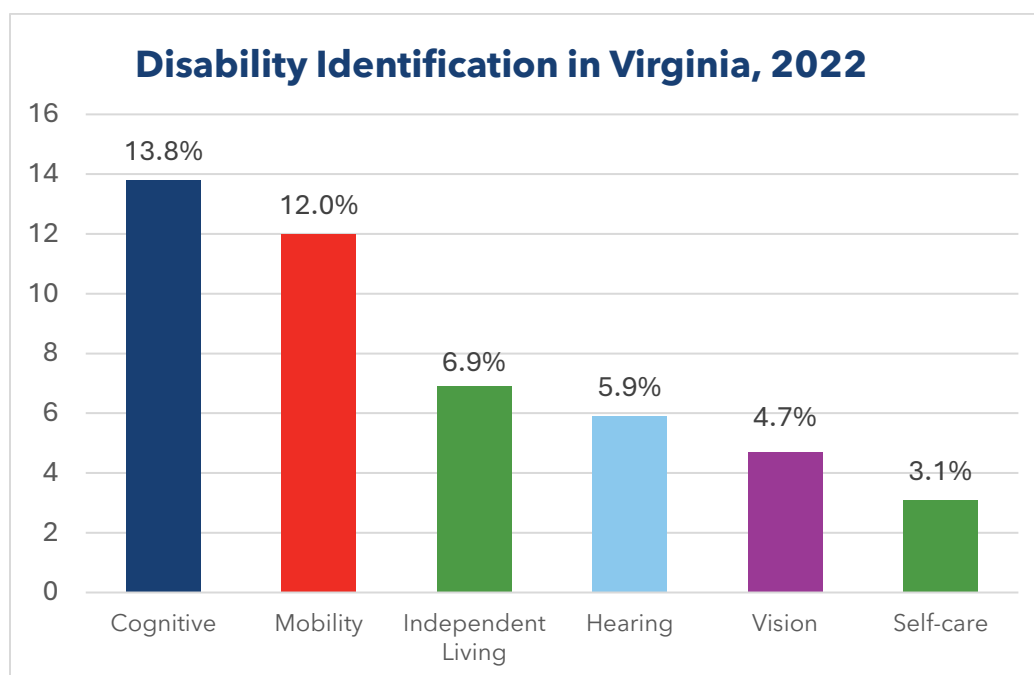
I. Disability in Your Community and Federal Law

Understanding Disability in Virginia

There is a large chance that people with disabilities are in any group you work with, including your staff and visitors. In 2022, the Centers for Disease Control (CDC) estimated that **over a quarter of Virginians (28.7%)** have a disability. It is important that every organization makes space for the accessibility needs of people with disabilities, as they make up a large part of the vibrant arts community we love.

The graph below shows that, in Virginia:

- The most common type of disability is a cognition disability, with 13.8% of adults having serious difficulty concentrating, remembering, or making decisions.
- 12.0% of adults have a mobility disability, with serious difficulty walking or climbing stairs.
- 6.9% of adults have an independent living disability, with serious difficulty doing errands alone.
- 5.9% of adults are deaf or have serious difficulty hearing.
- 4.7% of adults have a vision disability, with blindness or serious difficulty seeing even when wearing glasses.
- 3.1% of adults have a self-care disability, with serious difficulty dressing or bathing.



[Virginia Disability and Health Data | CDC](#) (accessed Aug. 8, 2025).

Accessibility Laws and Regulations

Section 504 of the Rehabilitation Act of 1973 provides that no otherwise qualified individual with a disability in the United States shall, solely by reason of his/her disability, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance (29 U.S.C. 794). This means that anyone who uses federal funds cannot exclude someone from their program just for having a disability.

The NEA's full regulations about the Rehabilitation Act can be found in [45 CFR Part 1151](#).

The Americans with Disabilities Act of 1990 (ADA), as amended, prohibits discrimination on the basis of disability in employment (Title I), state and local government services (Title II), places of public accommodation, and commercial facilities (Title III) (42 U.S.C. 12101-12213).

The ADA extends the requirements of Section 504 to:

- All activities of state and local government under Title II; and
- Places of public accommodation and commercial facilities operated by private entities, including places of "public display or collection" such as museums, under Title III.

So, the ADA might apply to you in these ways:

- Cultural groups run by state or local governments are covered by Title II;
- Title III covers cultural groups run by private entities that are open to the public, even if they do not receive federal funds; and
- Places of public accommodation that are also recipients of federal funding must comply with the requirements of both Title III of the ADA and Section 504.

If you are unsure what requirements you have, you can also use the free [ADA/504 ID Tool](#) published by Open Door Arts.



Jane Franklin Dance Group (Arlington, VA)

Accessibility in the NEA General Terms and Conditions

Section 504 Evaluation

The National Endowment for the Arts requires that anyone receiving their funds, including sub-grantees, must complete a Section 504 self-evaluation of accessibility, which covers regulations related to programs, activities, and facilities. Organizations receiving federal funding are required to keep the assessment on file for three years. Doing a self-assessment can also be helpful to understand where your organization can better accommodate or connect with people with disabilities.



Picture: STEP VA (Fredericksburg) performs *Seussical!*

While many assessments can fulfill this requirement, the [NEA has developed a 504 Self-Evaluation Workbook](#) that goes over every aspect of federal compliance. If that workbook is not used, the same information must be kept in a “comparable document”. (One that also qualifies is the [Open Door Arts Accessibility Self-Assessment](#).)

Please pay close attention to these tips from the NEA:

- Organizations receiving federal funding are required to review or conduct a new self-assessment every time they are awarded a federal grant.
- Organizations are required to keep the self-assessment on file (or the same information) for three (3) years.
- Self-assessment information is required to be readily available to anyone who asks, including the public and the NEA.



SECTION 504 SELF-EVALUATION WORKBOOK



These laws and regulations mean **all organizations** are legally required to:

- Ensure that their spaces are physically accessible for people with disabilities;
- Provide reasonable and necessary accommodation for participants, visitors, audiences, and staff;
- Communicate to the public about accessibility, including how to ask for accommodations.

Appointing an Accessibility Coordinator

Every arts organization receiving **federal funding** from the Virginia Commission for the Arts is required to appoint a staff member to serve as its accessibility coordinator or ADA Coordinator (NEA regulations use the term “504 Coordinator”).¹ Regardless of funding stream, the VCA encourages all our grantees to assign one person to direct accessibility efforts. The accessibility coordinator does not have to be in a full-time position, and you don’t need to hire someone new for the role. Many accessibility coordinators serve other roles within their organization.

The **accessibility coordinator** is important because they lead the organization’s access efforts and make sure the organization complies with Section 504 and the ADA. The name of this person, along with the completed 504 self-evaluation, must also be listed in the Final Report of any General Operating Support (GOS) grantee receiving federal funds. For more information on the self-evaluation, see above.

One of the accessibility coordinator’s most important jobs is to serve as a point of contact for people to ask for accommodations. You are encouraged to publish the name and contact information of this person on your website and in promotional materials. The accessibility coordinator also helps manage a grievance process for accessibility complaints (see below).



Picture: Charlottesville Ballet, 2023

There are many ways an accessibility coordinator can make activities open to disabled artists, audiences, patrons, instructors, administrators, and staff. These might include:

- Finding partners in disability organizations and working with them;
- Searching for people with disabilities to be part of your team, on your Board, or as volunteers;
- Creating an access advisory committee or finding “user experts” with various disabilities to help you plan programs;
- Looking over existing programs and policies to make sure they meet accessibility requirements or are accessible to people with disabilities;
- Continuing to learn about arts and disability and sharing that learning with your team.

Here is some guidance from the NEA on choosing an accessibility coordinator:

¹ Under the NEA’s 504 Regulations, it is required that “a responsible official be designated to coordinate the [grant] recipient’s efforts in connection with Section 504” (S1151.42).

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- The accessibility coordinator should be like a consultant to your board and staff, educating them about access issues and available resources. The accessibility coordinator ensures that access is a part of your organization's plans when relevant.
 - The accessibility coordinator doesn't need to have a specific professional background. In fact, an existing staff position can be given the role. Ideally, this is someone who is interested in accessibility, has lived experience, and/or gets to know the role through training, conferences, consultation, and use of available resources.
 - While the accessibility coordinator is the point person for access, accessibility must be everyone's responsibility to truly work for everyone.
 - As mandated by the ADA, the job description should list all of the necessary duties of the position. The [NEA Design for Accessibility](#) Handbook provides sample job descriptions of an accessibility coordinator and the ADA Network describes the [Role of an ADA Coordinator](#).

II. Policies and Practices of Your Organization

The Access Policy and Accessibility Statement

An **access policy** is a helpful tool inside your organization to quickly answer questions or concerns about accessibility. It has specific roles, lists when certain things should happen, and details how to respond to concerns from inside and outside your group, like those of staff, audiences, and artists. A great policy will set goals, create accountability, and avoid confusion about what needs you must meet. One example is the [Ohio Arts Council Access Policy](#).

Your organization should also write and publish an **accessibility statement** – a brief statement of values for the public to see that speaks to your commitment to include people with disabilities in your programs and services. Not only does it show your “good faith effort” to comply with the ADA and Section 504, but it also conveys that you want disabled Virginians to engage with your arts programming.

For example, the [VCA's accessibility statement](#) is:

The Virginia Commission for the Arts (VCA) believes that all Virginians have the right to access and experience the arts in our Commonwealth. As a state agency, we strive to meet and exceed all federal accessibility standards to benefit our communities. We encourage all partners receiving VCA funds to consider improving their accessibility efforts.

The VCA is dedicated to improving the accessibility of this website. We are proud to maintain our AA accessibility rating according to the ADA's Web Content Accessibility Guidelines (WCAG). If you are unable to access content or have enhancement suggestions, please contact:

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More examples of accessibility statements, as well as templates and helpful information on how to write your own, can be found at the [Open Door Arts Accessibility Training Hub](#).

The Accessibility Taskforce or Advisory Committee

One way to become more accessible, and to be informed by people with disabilities, is to form an advisory committee, taskforce, or other group that help guide your accessibility efforts. The kind of group, how formal it is, and how it meets can vary, but it should have the purpose of finding accessibility needs in your programming and space. In general: the group should include visitors, artists, and consultants who represent and/or have disabilities; and those people should be recruited from and reflective of your community.

An access taskforce might do these things:

- Evaluate the accessibility of your facilities, programs, and services;
- Make recommendations for needed improvements;
- Develop, or give feedback on, your access policy and accessibility statement;
- Provide guidance, education, and recommendations to staff on technical issues, funding sources, community relationships, and other accessibility considerations;
- Meet with the Virginia Commission for the Arts or other institutions to better understand statewide or regional accessibility programs, requirements, and funds.

Access Plan

An access plan is sign of your organization's "good faith" efforts to comply with the ADA and Section 504. It lays out measurable and concrete steps to improve your accessibility. It can also turn the results of your other efforts, like the self-assessment and access advisory committee, into manageable action items.

To start your access plan, you might conduct a self-assessment and take note of challenging areas. Then, think about how those issues might be fixed. The NEA's Section 504 workbook can be used, or you can create a document containing similar information.

An access plan might address these things, if you haven't done them already:

- A strong review of access procedures and how you interact with constituents;
- Appointing an accessibility coordinator;
- Accessibility of your buildings and spaces;
- Accessibility of your public events;
- Established grievance process when people have access concerns;
- Print materials that are understandable, in plain language, and easy to read;
- Website that is accessible by people with low hearing, vision, or mobility;
- Programming that is respectful and reflective of the community;
- Creating partnerships that promote inclusion and access.

Additionally, weave the access plan into your organization's long-term strategic plan by:

- Listing the access accommodations and services you offer;
- Making timetables for reviewing and updating your plan;
- Documenting any steps taken to remove barriers/make improvements;
- Budgeting for your accessibility work;
- Adding access language in your publications and communications;
- Documenting how individuals with disabilities are involved in your organization.

504/ADA Grievance Procedures

The NEA regulations state that "A [grant] recipient may adopt an internal grievance procedure in order to provide for the prompt and equitable resolution of complaints alleging any action prohibited by this part. A responsible official should be designated to coordinate the recipient's efforts in connection with this section" (45 CFR Part 1151). Under Title III of the ADA, places of public accommodation are encouraged to have a grievance procedure.

A **grievance procedure** is an established system for hearing and answering grievances, which occur when an accessibility challenge has been identified. It should do the following:

- Name the staff member who is responsible for accessibility
- Define responsibilities related to access
- Develop a clear procedure for responding to complaints
- Write clear criteria for reviewing grievances and judging your organization's response
- Describe hearing procedures, if hearings are necessary
- Establish time limits for when differences should be resolved

A grievance procedure can be used for both informal and formal complaints, and for reviewing complaints against an organization or its subgrantees. It is especially useful for solving conflicts in-house, without resorting to or invoking federal complaint mechanisms.

While there is no regulation describing exactly what a grievance procedure must include, the [Arts & Culture Accessibility Hub](#) has several resources on grievance procedures.



When investigating and responding to a grievance, try to obtain as much information as possible.

- Look for specific information as to who did what to whom, where, when, and how.
- Identify the problem is, solutions the complainant wants, and if it is organizationally feasible.
- Develop a timeline for when a complaint must be submitted and when they can expect a decision.
- A standard, normal procedure should be followed to resolve each issue, and the process should be documented in writing.

Individuals who have grievances against an organization receiving NEA funding is allowed to file a grievance under Section 504 with the [NEA's Office of Civil Rights](#). If that organization is also a place of public accommodation, which includes nonprofit or private cultural organizations, grievances can also be filed under Title III of the ADA through the [U.S. Department of Justice \(DOJ\)](#). Finally, a complaint related to employment can be sent to the [Equal Employment Opportunity Commission \(EEOC\)](#).

A person does not have to file a complaint with an organization before they file at the federal level, such as with the NEA or DOJ.

Staff Training

Training can help make sure that access is a part of everyday operations, and it can help avoid times where a visitor, artist, or staff member would be denied the access that they deserve. Staff and volunteers in every part of the organization, including both those who work with the public and those who work behind the scenes, should be given training.

The most effective training for your organization should model accessibility in its location, methods, and content. Both participants and presenters will benefit from demonstrations that include the actual places, methods, and equipment that will be used. Where appropriate: try to hold training sessions in accessible locations or online; provide handouts in large print and Braille; provide captions for live speech and videos; and provide sign language interpreters, so that staff experiences the aids and services that make programs inclusive.

You may also wish to work with area disability organizations, like a [local Center for Independent Living](#), the [disability Law Center of Virginia](#), the [Virginia Statewide Independent Living Council](#), and other [qualified and representative groups serving those with disabilities](#).

Accessibility coordinators should meet with staff on a regular basis to discuss issues, including representation of people with disabilities, your access budget, and the state of access in your community, to ensure continual growth in your culture of accessibility.

Communicating With and About People with Disabilities

Accessibility is about treating people with disabilities with respect, fairness, and understanding. To make sure your communications reflect that, you should set expectations about how staff and volunteers talk to and about people with disabilities – using the right language, being respectful, and avoiding stereotypes or outdated terms.

Staff at your organization should know the difference between **person-first language**, which places the person before a description of them, and **identity-first language**, which leads with the descriptor. Each person can have different preferences on how they want to be described. For example:

Person-first:

- “People with disabilities”
- “People who are wheelchair users”
- “Person living with HIV”
- “People who are neurodivergent”

Identity-first:

- “disabled people”
- “Deaf person”
- “Blind person”
- “Autistic person”

Person-first language is widely used in the United States because it avoids stigmatizing or reducing people with their disabilities. However, identity-first language is used in some contexts because it treats disability as a celebrated part of what makes a person who they are.

When communicating with people with disabilities, these are good rules of thumb:

- **Do** assume competence in the people you're talking to. Respect a person's dignity and autonomy and avoid infantilizing or belittling a person based on their appearance.
- **Do** ask questions and listen carefully. Patient, open-ended communication can help you quickly and easily know whether someone needs help, and if so, what kind.
- **Don't** use euphemisms, inspiration language, or metaphors (i.e. "suffers from" a disability, "differently abled," or "handi-capable")
- **Don't** make adjectives into nouns (i.e. "autistics," "the blind") or use outdated, short terms (i.e. "slow," "handicapped")

Further information on inclusive communication can be found at the [Arts and Culture Accessibility Hub](#).

III. Resources for Accessibility Coordinators

General Accessibility

These organizations can provide technical assistance, recommend local experts, and serve as potential partners.

- The [ADA National Network](#) is a federally funded network of 10 regional ADA centers located throughout the United States that provide information, guidance, and training on the ADA. The centers can provide assistance on all aspects of the ADA, including accessible technology, employment, and Title II (state and local government) and Title III (places of public accommodation) requirements. Resources and information are provided in publications and videos.
 - The New England ADA Center's [ADA Checklist for Readily Achievable Barrier Removal](#) allows organizations to evaluate their physical environment to ensure it is in compliance with the ADA.
- The [NEA Tipsheet on the 2010 ADA Revisions](#) highlights some of the revisions to the ADA that have a specific effect on cultural venues, such as theaters or museums including changes in service animal considerations, accessible ticketing, and expansion of mobility devices.
- The [United States Access Board](#) is an independent federal agency devoted to accessibility for people with disabilities. They give confidential information and resources to help answer our questions about accessibility guidelines and standards. The board oversees design criteria for the built environment, transit vehicles, telecommunications equipment, and electronic and information technology.
- In 1986, the [National Center on Disability](#) (NCD) recommended enactment of an Americans with Disabilities Act and then drafted the first version of the bill introduced in the House and Senate in 1988. Since enactment of the ADA in 1990, NCD has continued to play a leading role in addressing the concerns of people with disabilities by advising public policy.
- The [Job Accommodation Network](#) (JAN) provides free, expert, and confidential guidance on workplace accommodations and disability employment issues.

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- The [Virginia Statewide Independent Living Council](#) has a list of Virginia statewide and national disability organizations and you can [find the closest independent living center](#) in your area to learn more about access services and resources for engaging with specific disability communities.
 - The [Autistic Self Advocacy Network](#) (ASAN) is a national grassroots disability rights organization for the autistic community. They offer a wealth of resources for how to increase participation of people with intellectual and developmental disabilities, notes on autistic access needs, inclusive meetings and trainings, identity first language, and model plain language and easy language documents.
 - The U.S. Department of Labor has a [Plain Language Quick Reference Guide](#) that is a one-page tip sheet incorporating [Federal plain language guidelines](#). You may also review [How to talk about disability from GBH \(wgbh.org\)](#) to learn more about how to write and talk about disability.
 - The [American Foundation for the Blind](#) explains audio description and provides other resources for engaging people with vision disabilities.
 - The [Registry of Interpreters for the Deaf](#) (RID) is a national membership organization for sign language interpreters and transliterators. The RID website allows organizations to search for and find a certified interpreter in a specific area.

Cultural Accessibility

Below are additional accessibility resources and examples of access in action in arts and cultural spaces and programming.

- The [Virginia Commission for the Arts Accessibility](#) webpage provides an example of an accessibility statement and lists resources for arts visitors, artists, and arts organizations.
- The [Arts & Culture Accessibility Hub](#) is a newly launched free resource, co-created by a majority-disabled team of cultural access experts. The platform offers tools, training, and guidance to help you strengthen your organization's accessibility, and connect with community. The Hub can also help you connect with area experts in disability and the arts.
- The [National Endowment for the Arts Accessibility](#) web page offers accessibility resources including the [Careers in the Arts Toolkit](#). The Toolkit is divided into four sections to assist: 1) [artists, cultural workers, and youth with disabilities](#), 2) [arts employers](#), 3) [educators](#), and 4) [grant makers](#) on ways to explore and support participation and employment of people with disabilities in the arts.



arts.gov/ArtsCareersToolkit

- The John F. Kennedy Center for the Performing Arts' [Office of Accessibility and VSA](#) offers several [access services for patrons and visitors with disabilities](#). You can learn about the various types of access services you might offer in a performing arts space through their examples.
- The [Smithsonian Office of Visitor Accessibility](#) offers examples of how to convey access features to visitors with disabilities and has specific resources for museum professionals.
- The Institute for Museum and Library Services maintains an [Accessibility in Museums and Libraries](#) webpage of accessibility resources for museums, libraries, and archives.
- The John F. Kennedy Center for the Performing Arts' [Office of Accessibility and VSA](#) describes [access services for patrons and visitors with disabilities](#).
- The [National Center on Accessibility](#), established through a cooperative agreement between Indiana University and the National Park Service, on access issues unique to parks, recreation, and tourism programs and facilities.
- Learn from disabled stories and disabled artists:
 - [The Heumann Perspective](#) – information about the disability rights movement with archival video interviews between the mother of disability rights movement, Judy Heumann and other disability activists
 - [National Endowment for the Arts Blogs](#) – search for “disability” to read interviews with disabled artists

Web and Media Accessibility

Digital access has become more important than ever and is an essential communication tool. These organizations can provide technical assistance, tools, and resources for ensuring multimedia and electronic accessibility for people with disabilities. This includes access features such as captioning, image descriptions and alt text, and accessible navigation

features for people with disabilities.

- [National Center for Accessible Media](#) at GBH is dedicated to making media and all forms of electronic communication fully accessible to people with disabilities.
- [WebAIM](#) provides comprehensive web accessibility technical assistance resources and software tools, including a [color contrast checker](#).
- [WAVE](#) is a free web accessibility evaluation tool that will evaluate the accessibility of a specific page on a website simply by entering the web address.
- The [Web Accessibility Initiative](#) develops standards and materials to support web accessibility with resources for everyone from web developers to web users.
- The [National Captioning Institute](#) is a nonprofit organization dedicated to providing a variety of services to ensure full media access, including captioning, subtitling, translation, and video description.
- The [American Foundation for the Blind](#) conducts research and offers resources on digital inclusion for people with vision disabilities.
- [AbleGamers](#) works to improve access to digital entertainment for people with disabilities, including video games and apps.