

Provider training guide for All Plan Letter 22-002: Alternative format selection for members with visual impairments

For Blue Shield of California Promise Health Plan
Medi-Cal and Cal MediConnect Network Providers



In March of 2022, The Department of Health Care Services (DHCS) issued [All Plan Letter \(APL\) 22-002](#), “Alternative format selection for members with visual impairments.” It provides information about the DHCS’ processes to ensure effective communication with members with visual impairments or other disabilities requiring the provision of written materials in alternative formats, by tracking members’ alternative format selections (AFS).

This guide is designed to help you understand the information in this APL, and apply it to your practice or facility operations, where appropriate.

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Understanding APL 22-002

Acronyms and terminology

ADA Americans with Disabilities Act

The **ADA** is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else.

AFS Alternative format selections

AFS refers to materials selected by Medi-Cal members with visual impairments or other disabilities that require written materials in alternative formats such as large print or Braille.

APL All Plan Letter

APLs are the means by which Medi-Cal Managed Care conveys information or interpretation of changes in policy or procedure at the Federal or State levels, and provides instruction to contractors, if applicable on how to implement these changes on an operational basis.

AR (Member's) assigned representative

And **AR** is a Medi-Cal member's authorized representative, for example, someone who has power of attorney for health-related matters. An AR may make an AFS request on behalf of a member.

DHCS Department of Health Care Services

The **DHCS** is the department within the California Health and Human Services Agency that finances and administers Medi-Cal, which provides health care services to low-income people.

MCP Medi-Cal managed care health plan

An **MCP** is a health plan, such as Blue Shield Promise, for Medi-Cal members.

Understanding APL 22-002

Requirements

Purpose of APL 22-002

- APL 22-002 aims to ensure effective communication with members with visual impairments or other disabilities requiring the provision of written materials in alternative formats, by tracking members' alternative format selections (AFS).
- Managed care plans (MCPs) such as Blue Shield of California Promise Health Plan (Blue Shield Promise) are subject to the standards of Title II of the ADA, including standards for communicating effectively with individuals with disabilities to ensure they benefit equally from government programs.
- MCPs and their subcontractors and network providers will accommodate and track members' AFS and will submit member AFS data to the Department of Health Care Services (DHCS).
- DHCS will share member AFS data with MCPs on an ongoing basis.

Understanding APL 22-002

Requirements

What Blue Shield Promise will do

- When requested, Blue Shield Promise will provide members written materials in alternative formats such as Braille, audio format, large print (no less than 20 point, Arial font), accessible electronic format (such as a data CD) and other appropriate aids and services.
 - Alternative formats may be requested for members and their assigned representatives (ARs), which may be a family member, friend, or other associate.
 - Blue Shield Promise utilizes a vendor to create these materials
- Blue Shield Promise must collect and store AFS information for members and ARs.
- Blue Shield Promise will share member AFS data with DHCS according to the instructions in the [Alternative Format Application User Guide](#) which was distributed with the APL.
- The DHCS maintains member AFS data and sends a weekly AFS file to Blue Shield Promise (and other MCPs).
 - Blue Shield Promise will use this data to update their records.
 - Blue Shield Promise will share this data with providers so that they can update their own records with their patients' alternative format preferences. Blue Shield Promise will share more details about this process with providers when they become available.

Understanding APL 22-002

Requirements

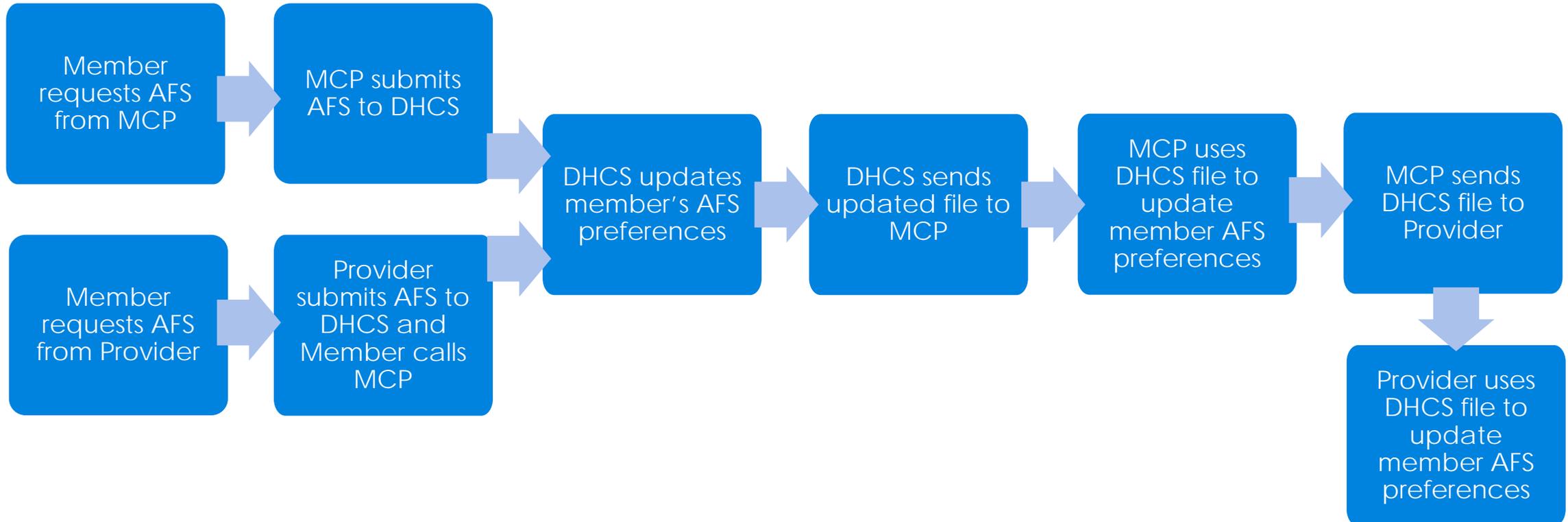
What Providers can expect

- If Blue Shield Promise Medi-Cal members request alternate format materials from providers, providers should:
 - provide the materials as requested by the member in their preferred AFS format.
 - submit any new member AFS requests at the time of the member's request to the DHCS according to the instructions in the [Alternative Format Application User Guide](#) which was distributed with the APL.
 - ask the member to contact Blue Shield Promise member services and communicate their preferred format.

Understanding APL 22-002

Process

How member AFS preference is captured and updated



Effective communication requirement of Title II of the ADA

Communication preferences

- People who have vision, hearing, or speech disabilities (“communication disabilities”) use different ways to communicate.
- For example, people who are blind may give and receive information audibly rather than in writing and people who are deaf may give and receive information through writing or sign language rather than through speech.

ADA requirements

- The ADA requires that title II entities (State and local governments) and title III entities (businesses and nonprofit organizations that serve the public) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is equally effective as communication with people without disabilities.
- When deciding what aid or service is needed to communicate effectively, consider the nature, length, complexity, and context of the communication as well as the person’s normal method(s) of communication.
- Click the link below to access a publication designed to help title II and title III entities understand how the rules for effective communication apply to them. <https://www.ada.gov/effective-comm.htm>

How to provide accessible documents

ADA guidance

- The ADA encourages businesses and nonprofit organizations that serve the public to consult with the person with a disability to discuss what aid or service is appropriate.
- The goal is to provide an aid or service that will be effective, given the nature of what is being communicated and the person's method of communicating.
- Remember, not all ways work for all people with disabilities or even for people with one type of disability.

How to provide accessible documents

Types of alternative formats

Standard alternative format options

- **Large print:** Large (20-point) size Arial font.
- **Audio CD:** Provides the ability to hear notices and information.
 - Files in the CD are not encrypted.
 - Recommended audio format is MP3, the most common format for a digital audio file with a relatively small file size.
- **Data CD:** Allows for the use of computer software to read notices and other written information.
 - Files in the CD are not encrypted, and PDF is the recommended file format.
 - Recommended media type is Standard CD-R
- **Braille:** Raised dots read with fingers.

Non-standard alternative format options

- **Encrypted Audio CD:** Provides the ability to hear notices and information.
 - Files for Medi-Cal notice in the CD are protected with a password.
- **Encrypted Data CD:** This allows for the use of computer software to read notices and other written information. Files for Medi-Cal notice in the CD are protected with a password

For more details on alternative formats, see the Appendix

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Alternative format vendors

- Blue Shield Promise uses ISI Language Solutions for alternative format and translation services. Their ADA compliance services include Large Print and Braille, American Sign Language (ASL), and subtitling services. <https://isilanguagesolutions.com/>
- Blue Shield of California uses Valle Translations They offer translations from English into Spanish, among several other languages, as well as copy-editing and proofreading services for medical, legal (certified), scientific, technical and literary documents, as well as audio files. <https://www.valletranslations.com/>

How to provide accessible websites

Resources for web accessibility

- **Accessibility Online Webinars** – The ADA National Network offers free webinars on topics including website accessibility at <http://www.accessibilityonline.org/ao/>
- **Web Content Accessibility Guidelines (WCAG) international standard** – This site includes documents that explain technical standards for making web content more accessible to people with disabilities. Note that these are technical standards, not an introduction to accessibility. <https://www.w3.org/WAI/standards-guidelines/wcag/>
 - To view examples of web accessibility from WCAG, visit <https://www.w3.org/WAI/fundamentals/accessibility-intro/#examples>

Additional training and resources

Helpful links

- **APL 22-002 ALTERNATIVE FORMAT SELECTION FOR MEMBERS WITH VISUAL IMPAIRMENTS:** <https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2022/APL-22-002.pdf>
- **Alternative Format Selection Application User Guide:** <https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2022/Alternative-Format-Selection-Application-User-Guide.pdf>. This was distributed with the APL and includes instructions on how to enter Medi-Cal member AFS in the application linked below.
- **DHCS Alternative Format Selection Application:** <https://afs.dhcs.ca.gov/>. This is where MCPs and providers submit any new member AFS requests at the time of the member's request to the DHCS according to the instructions in the Alternative Format Application User Guide which was distributed with the APL.
- **Visit the ADA National Network** to request ADA Training or view upcoming events at: <https://adata.org/ada-training>
- **Pacific ADA Center** (California's regional ADA center): <https://www.adapacific.org/>
- **Healthcare and the Americans with Disabilities Act fact sheet** from the Pacific ADA Center: <https://www.adapacific.org/assets/documents/health-care-and-ada-factsheet.pdf>
- **ADA Title II Regulations:** https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm
- **Effective communication requirement of Title II of the ADA:** <https://www.ada.gov/effective-comm.htm>
- **Blue Shield Promise Provider Services:** (800) 468-9935