State of California-Health and Human Services Agency

DATE: October 28, 2015

## ALL PLAN LETTER 15-023

## TO: ALL MEDI-CAL MANAGED CARE HEALTH PLANS

SUBJECT: FACILITY SITE REVIEW TOOLS FOR ANCILLARY SERVICES AND COMMUNITY-BASED ADULT SERVICES PROVIDERS

## PURPOSE:

The purpose of this All Plan Letter (APL) is to require Medi-Cal managed care health plans (MCPs) to use two new forms on assessing the physical accessibility of facilities used by providers of ancillary services and Community-Based Adult Services (CBAS) that serve a high volume of seniors and persons with disabilities (SPDs).

This APL supplements PLs 14-004 and 12-006. PL 14-004 discusses Facility Site Review (FSR) tools and PL 12-006 presents amendments to FSR Tool Attachment C. The FSR process detailed in PL 14-004 remains in effect for assessing the physical accessibility of primary care provider (PCP) sites.

## BACKGROUND:

Welfare and Institutions Code (W\&I Code) Section 14182(b)(9) requires the Department of Health Care Services (DHCS) to provide MCPs with survey tools to evaluate the accessibility of provider facilities for SPDs. DHCS originally provided MCPs with FSR tools in Policy Letter (PL) 02-002, ${ }^{1}$ which was also intended to reduce the number of site reviews DHCS conducted, in compliance with Health and Safety Code Section 1342.8. Since then, MCPs have determined the local collaborative processes, systems, and methods to use to coordinate FSR processes. These responsibilities may be shared by all MCPs within a county, delegated to one or more MCPs, or subcontracted to other entities. Each MCP is responsible to coordinate and consolidate FSRs and to share responsibility for defining the local process. These procedures are also established in the MCP contract in Exhibit A, Attachment 4, Site Review. ${ }^{2}$

[^0]MCPs are also required to identify such high-volume SPD facilities per PLs 12-006 and 14-004, and to report that information to their Managed Care Operations Division (MCOD) contract manager. ${ }^{3}$

Attachments A and B of PL 14-004 provide current survey forms (i.e., tools) for FSRs related to facility operations, sterilization, and medical records reviews, respectively. MCPs must complete each tool and submit them to DHCS. The FSR tool for PCPs and specialists is available as Attachment C in PL 12-006. The new FSR tool for ancillary providers is attached to this APL as Attachment D. The new FSR tool for CBAS providers is attached to this APL as Attachment E.

Ancillary service provider sites are free-standing facilities that provide diagnostic and therapeutic services, such as, but not limited to: laboratory, infusion, radiology, imaging, cardiac testing, renal dialysis, occupational therapy, speech therapy, physical therapy, pulmonary testing, and cardiac rehabilitation.

CBAS provider sites include all facilities that provide bundled CBAS services, and do not include Licensed Only Adult Day Health Care centers and Programs of All-Inclusive Care for the Elderly. CBAS centers offer a package of health, therapeutic, and social services in a community-based day health care program. Services are provided according to a six-month plan of care developed by the CBAS center's multidisciplinary team. The services are designed to prevent premature and unnecessary institutionalization and to keep recipients as independent as possible in the community. CBAS services (defined in W\&I Code Section 14550.5 and provided each day of attendance) include professional nursing services, personal care services and/or social services, therapeutic activities, one meal per day, and additional services as specified on the participant's Individual Care Plan.

MCPs are responsible for ensuring that their delegates comply with all applicable state and federal laws and regulations and other contract requirements as well as DHCS's guidance, including APLs.

## REQUIREMENTS:

This APL provides FSR tool Attachments D (ancillary) and E (CBAS). These new forms are based on FSR Tool Attachment C, last updated in PL 12-006.

For FSR tool Attachments D and $\mathrm{E}, \mathrm{MCPs}$ must comply with the same requirements as were defined in PL 12-006, relating to assessing physical accessibility. MCPs should not submit the completed Attachments D and E to DHCS, but must retain and keep them available for inspection by DHCS staff during site reviews or audits. DHCS does not require that FSR tool Attachments D and E be conducted by a registered nurse or

[^1]physician. As with FSR tool Attachments A, B, and C, an MCP may delegate these responsibilities to another MCP or subcontract these responsibilities to an appropriate entity. However, the delegating MCP remains responsible to ensure that surveys completed by another entity are conducted in compliance with the FSR requirements. DHCS recognizes that hospitals represent a unique group of ancillary providers; therefore, each MCP is required to collaborate with each hospital in its provider network to assess whether the hospital meets each of the components of Attachment C. Each MCP must demonstrate that it received adequate documentation from each hospital in its provider network to complete Attachment C by maintaining the records that support its assessment of the hospital's physical accessibility.

Each MCP must make this physical accessibility information available through its website and provider directory. The information provided must, at a minimum, display the level of access results met per provider site as either Basic Access or Limited Access. Additionally, each MCP must indicate whether each site has the Medical Equipment (and/or Participant Area) Access (appropriate to ancillary or CBAS providers) as defined in FSR Attachment C, and identify whether each provider site has or does not have access in the following categories: parking, building exterior, building interior, exam room, restroom, and medical equipment.

Each MCP must submit all required documentation of how it implements the requirements of Attachment $C$ (not Attachment $C$ itself) to its designated MCOD contract manager. MCPs are also required to submit updated documentation of the above by January 31 of each year indicating any changes made to the high-volume benchmarks (see PL 12-006, page 3) as a result of the availability of more complete utilization data. If an MCP has made no changes to its implementation method, only a letter stating this must be submitted to the MCP's MCOD contract manager. If there are changes, all of the documentation must be submitted to the MCP's MCOD contract manager in red-line to clearly identify the changes.

DHCS will continue to review these annual submissions and provide feedback to MCPs regarding any areas of concern. However, each MCP must maintain all original documentation of these assessments and make this information available to DHCS or its representative for contract monitoring or auditing purposes.

## IMPLEMENTATION TIMELINE:

MCPs are required to begin using FSR Attachments C, D, and E appropriate to their provider type in line with the three-year cycle requirement of FSR Attachments A and B, effective one year from the date of this APL. New providers who meet the criteria mentioned above are subject to the FSR immediately. MCPs must ensure that site reviewers, including delegated and sub-delegated site reviewers, receive training on the accessibility tools for ancillary and CBAS providers, as required in APL 14-004 under Local Collaboration and the MCP contract.

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If you have any questions regarding this APL, please contact your MCOD contract manager.

Sincerely,
Original Signed by Sarah C. Brooks
Sarah Brooks, Deputy Director
Health Care Delivery Systems
Department of Health Care Services
Attachments

## Ancillary Services Physical Accessibility Review Survey

California Department of Health Care Services
Managed Care Quality and Monitoring Division
For purposes of this tool, Ancillary Services refers to Diagnostic and Therapeutic services such as, but not limited to: Radiology, Imaging, Cardiac Testing, Kidney dialysis, Physical Therapy, Occupational therapy, Speech therapy,Cardiac rehabilitation, Pulmonary testing.

| Provider Name: | Date of Review: |
| :---: | :---: |
|  | Name of Reviewer: |
| $\square$ Radiology $\square$ Infusion <br> $\square$ Physical Therapy $\square$ Other |  |
| Address: | Health Plan Name: |
| City: |  |
| Phone: FAX: | Contact Person Name: |
|  | Level of Access: |
| Basic Access: Demonstrates ancillary facility site access for the members with disabilities to parking, building, elevator, restroom, diagnostic and treatment use. To meet Basic Access requirements, all (34) Critical Elements (CE) must be met. | $\square$ Basic Access |
| Limited Access: Demonstrates ancillary facility site access for the members with a disability is missing or is incomplete in one or more features for parking, building, elevator, restroom, diagnostic and treatment use. Deficiencies in 1 or more of the Critical Elements (CE) are encountered. | $\square$ Limited Access |
| Medical Equipment: Diagnostic and treatment equipment meet accessibility features for use as indicated the "accessibility indicators". (assistance is available for the equipment used). | $\square$ Medical Equipment is available List of Equipment |

Below are the symbols that will be used in the provider directories to indicate areas of accessibility at the ancillary site. These should also be used in online directories. In order for an ancillary site to receive a symbol, the appropriate criteria must be met.

These symbols are in addition to identifying whether the provider office has Basic Access or Limited Access. A provider who has Basic Access will automatically meet the critical elements for the first 5 symbols (P, EB, IB, R, PD).

| Accessibility Indicator | Must Satisfy these Criteria | Yes | No | N/A |
| :--- | :--- | :--- | :--- | :--- |
| P = PARKING | Critical Elements (CE): 3,7,8,11 | Comments |  |  |
| EB = EXTERIOR BUILDING | (CE): 14,20,21,22,25 |  |  |  |
| IB = INTERIOR BUILDING | (CE): 28,31,42,43,44,45,46,47 |  |  |  |
| R = RESTROOM | (CE): 53, 55,56,59,62,64 |  |  |  |
| PD = PATIENT DIAGNOSTIC AND <br> TREATMENT USE | (CE): 66,67,70,76,78 |  |  |  |
| T = MEDICAL EQUIPMENT | (T): 72,73,74,77,80,81 |  |  |  |

$2^{\text {nd }}$ Periodic PARS Review: I certify that there have been no changes since the last physical accessibility review:
Name: $\qquad$ Signature: $\qquad$ Date: $\qquad$
3rd Periodic PARS Review: I certify that there have been no changes since the last physical accessibility review:
Name: $\qquad$ Signature: $\qquad$ Date: $\qquad$

## PARKING







EXTERIOR ROUTE (FROM ACCESSIBLE PARKING, PUBLIC TRANSPORTATION, AND PUBLIC SIDEWALK TO THE ENTRANCE)



|  | Is the route to the entrance from the <br> accessible parking spaces, including <br> transitions at curb ramps, free of <br> grates, gaps, and openings that are <br> both greater than $1 / 2$ inch wide and <br> over $1 / 4$ inch deep? | Self explanatory. |  |  |  |
| :---: | :--- | :--- | :--- | :--- | :--- |

## RAMPS:




BUILDING ENTRANCE



INTERIOR ROUTE (FROM THE BUILDING ENTRANCE, TO THE REGISTRATION COUNTER/WINDOW, AND THROUGH TO THE PARTICIPANT AREAS






## ELEVATORS

| 41 | Is there an elevator? |  |  |  |  |
| :---: | :--- | :--- | :--- | :--- | :--- |




| $\mathbf{4 8}$ | Is there an emergency <br> communication system in the <br> elevator? | Self explanatory. |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
| $\mathbf{4 9}$ | Is the elevator emergency <br> communication system usable <br> without requiring voice <br> communication? | It is essential that emergency communication <br> not be dependent on voice communications <br> alone because the safety of people with <br> hearing or speech impairments could be <br> jeopardized. Visible signal requirement could <br> be satisfied with something as simple as a <br> button that lights when the message is <br> answered, indicating that help is on the way. |  |  |  |
| $\mathbf{5 0}$ | Do raised letters and Braille <br> identify the emergency intercom in <br> the elevator? | Self explanatory. |  |  |  |

## ALL RESTROOMS/TOILET ROOMS (WITH AND WITHOUT STALLS):



| $\begin{gathered} 55 \\ \text { (CE) } \end{gathered}$ | Is the toilet paper dispenser mounted below the side grab bar with the centerline of the toilet paper dispenser between 7 inches and 9 inches in front of the toilet, and at least 15 inches high? |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\begin{gathered} 56 \\ \text { (CE) } \end{gathered}$ | Is there a space that is at least 30 inches wide and 48 inches deep to allow wheelchair users to park in front of the sink? | This space must extend at least 17 inches under the sink from the front edge, although it can extend up to 19 inches underneath. |  |  |  |  |
| 57 | Is the space in front of the sink free of trashcans and other movable items? | Self explanatory. |  |  |  |  |



|  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |



## PATIENT AREAS (DIAGNOSTIC \& TREATMENT, ROOMS)






|  | Is lift equipment available to <br> assist staff with transfers <br> (portable, overhead, or ceiling <br> mounted)? | Self Explanatory |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
| (T) |  |  |  |  |
| 78 | Is staff trained yearly on safe <br> (ransfer techniques? | Self explanatory |  |  |
| (CE) |  |  |  |  |

## WEIGHT MEASUREMENT



## References

## 2010 ADA Standards for Accessible Design

U.S Department of Justice
http://www.ada.gov/2010ADAstandards_index.htm
The revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. They provide the scoping and technical requirements for new construction and alterations resulting from the adoption of revised 2010 Standards in the final rules for Title II (28 CFR part 35) and Title III ( 28 CFR part 36). The 2010 ADA Standards go into effect March 15, 2012, but can be used now instead of the 1991 standards. The FSR Attachment C draws upon access requirements found in both the 1991 Americans with Disabilities Act Accessibility Guidelines and the 2010 ADA Standards. Some diagrams that appear in the FSR Attachment C are reproduced from these sources.

Two questions in the FSR Attachment C were drawn from Title 24, Part 2 of the California Building Standards Code. These are 1133B.4.4 - Striping for the visually impaired (Rev.1-1-2009), and 1115B-1 - Bathing and Toilet Facilities, placement of toilet paper dispensers. These standards can be found in:

## 2009 California Building Standards Code with California Errata and Amendments

State of California
Department of General Services
Division of the State Architect
Updated April 27, 2010
http://www.documents.dgs.ca.gov/dsa/pubs/access_manual_rev_04-27-10.pdf
Some diagrams are reprinted with permission from the Kentucky Department of Vocational Rehabilitation. These illustrations can also be found in:

## "Health Care Usability Profile V3"

© Copyright 2008
Oregon Health \& Science University RRTC: Health \& Wellness
Authors: Drum, C.E., Davis, C.E., Berardinelli, M., Cline, A., Laing, R., Horner-Johnson, W., \& Krahn, G.
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## Community Based Adult Services (CBAS) Physical Accessibility Review Survey

California Department of Health Care Services
Managed Care Quality and Monitoring Division

| Provider Name: <br> $\square$ CBAS <br> $\square$ Other | Date of Review: |
| :--- | :--- |
|  | Name of Reviewer: |
| Address: | Health Plan Name: |
| City: FAX: | Contact Person Name: |
| Phone: | Level of Access: |
| Basic Access: Demonstrates facility site access for the members with disabilities to <br> parking, building, elevator, Participant Areas, and restroom. To meet Basic Access <br> requirements, all (24) Critical Elements (CE) must be met. | $\square$ Basic Access |
| Limited Access: <br> missing or is incomplete in one or more features for parking, building, elevator, participant <br> areas, and restroom. Deficiencies in 1 or more of the Critical Elements (CE) are <br> encountered. | $\square$ Limited Access |

Below are the symbols that will be used in the provider directories to indicate areas of accessibility at a provider office/site. These should also be used in online directories. In order for a provider office to receive a symbol, the appropriate criteria must be met.

These symbols are in addition to identifying whether the provider office has Basic Access or Limited Access. A provider who has Basic Access will automatically meet the critical elements for the first six symbols (P, EB, IB, R, PA,). And a provider who has Medical Equipment Access will meet the medical equipment elements for the last symbol (T).

| Accessibility Indicator | Must Satisfy these Criteria | Yes | No | N/A |
| :--- | :--- | :--- | :--- | :--- |
| P = PARKING | Critical Elements (CE): 6,7,8 | Comments |  |  |
| EB = EXTERIOR BUILDING | (CE): 9,15,16,17,20 |  |  |  |
| IB = INTERIOR BUILDING | (CE): $23,26,36,37,38,39,40,41$ |  |  |  |
| R=RESTROOM | (CE): 47,49,50,53,56,58 |  |  |  |
| PA= PARTICIPANT AREAS | (CE): 60,61 |  |  |  |

$2^{\text {nd }}$ Periodic PARS Review: I certify that there have been no changes since the last physical accessibility review:
Name: $\qquad$ Signature: $\qquad$ Date: $\qquad$
3rd Periodic PARS Review: I certify that there have been no changes since the last physical accessibility review:
Name: $\qquad$ Signature: $\qquad$ Date: $\qquad$

## PARKING

|  | Are accessible parking spaces <br> provided in the designated parking <br> area? | Self explanatory. |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
| $\mathbf{2}$ | Are the correct number of accessible <br> parking spaces provided? <br> 1 to 25 total spaces -1 required <br> 26 to $50-2$ required <br> 51 to $75-3$ required <br> 76 to $100-4$ required <br> 101 to $150-5$ required <br> 151 to 200-6 required <br> 201 to $300-7$ required <br> 301 to $400-8$ required | If there are 25 total parking spaces or less, at <br> least one accessible space is required. If there <br> are between 26 and 50 total spaces, at least <br> two accessible spaces are required, etc. |  |  |  |
| $\mathbf{3}$ | Is the accessible parking spaces(s) <br> closest to the main entrance? | The accessible parking space (s) should afford <br> the shortest route of travel from adjacent <br> parking to the accessible entrance. |  |  |  |


|  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |


|  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
| (CE) | Is a passenger loading zone <br> provided with a vehicular pull- <br> up space. | The vehicular pull-up space dimension is a <br> minimum of 96 inches wide and 20 feet <br> long |  |  |  |



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## EXTERIOR ROUTE (FROM DROP OFF AND PICK UP LOCATIONS TO THE ENTRANCE)



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|  | building entrance stable, firm, and <br> slip resistant from the following: <br> (Please mark NA for those that do <br> not apply.) | ground surface without loose elements like <br> gravel or wood chips. <br> Firm surfaces include solid concrete or <br> pavement as opposed to a grassy, graveled or <br> soft soil surface. <br> Avoid glossy or slick surfaces such as ceramic <br> tile. |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
|  | a. Public Transportation |  |  |  |  |
|  | b. Public sidewalk? |  |  |  |  |
| $\mathbf{1 2}$ | c. Drop off? | Is there an accessible route that <br> does not include stairs or steps? | Self explanatory. |  |  |
|  |  |  |  |  |  |
| $\mathbf{1 3}$ |  |  |  |  |  |

RAMPS:


BUILDING ENTRANCE


|  |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| 21 | Are there automatic doors? | Self explanatory. |  |  |  |  |

INTERIOR ROUTE (FROM THE BUILDING ENTRANCE, TO THE REGISTRATION COUNTER/WINDOW, AND THROUGH TO THE PARTICIPANT AREAS




32 \begin{tabular}{l}

| Do signs identifying permanent |
| :--- |
| rooms and spaces include raised |
| letters and Braille? | <br>

33 <br>
Are the raised letters and Braille <br>
signs mounted between 48 inches <br>
and 60 inches from the floor?
\end{tabular}





| $\mathbf{4 2}$ | Is there an emergency <br> communication system in the <br> elevator? | Self explanatory. |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
| $\mathbf{4 3}$ | Is the elevator emergency <br> communication system usable <br> without requiring voice <br> communication? | It is essential that emergency communication <br> not be dependent on voice communications <br> alone because the safety of people with <br> hearing or speech impairments could be <br> jeopardized. Visible signal requirement could <br> be satisfied with something as simple as a <br> button that lights when the message is <br> answered, indicating that help is on the way. |  |  |  |
| $\mathbf{4 4}$ | Do raised letters and Braille <br> identify the emergency intercom in <br> the elevator? | Self explanatory. |  |  |  |

ALL RESTROOMS/TOILET ROOMS (WITH AND WITHOUT STALLS):






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|  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
| 62 | Is there a bed that is between 17 <br> inches and 19 inches from the floor <br> to the top of the cushion? | Self explanatory |  |  |  |

## References

## 2010 ADA Standards for Accessible Design

U.S Department of Justice
http://www.ada.gov/2010ADAstandards_index.htm
The revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. They provide the scoping and technical requirements for new construction and alterations resulting from the adoption of revised 2010 Standards in the final rules for Title II ( 28 CFR part 35) and Title III ( 28 CFR part 36). The 2010 ADA Standards go into effect March 15, 2012, but can be used now instead of the 1991 standards. The FSR Attachment C draws upon access requirements found in both the 1991 Americans with Disabilities Act Accessibility Guidelines and the 2010 ADA Standards. Some diagrams that appear in the FSR Attachment C are reproduced from these sources.

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## 2009 California Building Standards Code with California Errata and Amendments

## State of California

Department of General Services
Division of the State Architect
Updated April 27, 2010
http://www.documents.dgs.ca.gov/dsa/pubs/access_manual_rev_04-27-10.pdf
Some diagrams are reprinted with permission from the Kentucky Department of Vocational Rehabilitation. These illustrations can also be found in:

## "Health Care Usability Profile V3"

(C) Copyright 2008

Oregon Health \& Science University RRTC: Health \& Wellness
Authors: Drum, C.E., Davis, C.E., Berardinelli, M., Cline, A., Laing, R., Horner-Johnson, W., \& Krahn, G.
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Portland, OR 97239
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healthwellness.org


[^0]:    ${ }^{1}$ PL 02-002 is available at:
    http://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/PL2002/MMCDPL02002.pdf.
    ${ }^{2}$ Boilerplate contracts are available at:
    http://www.dhcs.ca.gov/provgovpart/Pages/MMCDBoilerplateContracts.aspx.

[^1]:    ${ }^{3}$ PLs 12-006 and 14-004 are available at: http://www.dhcs.ca.gov/formsandpubs/Pages/MMCDPlanPolicyLtrs.aspx.

