

State of California—Health and Human Services Agency Department of Health Care Services



DAVID MAXWELL-JOLLY Director ARNOLD SCHWARZENEGGER Governor

MMCD Policy Letter 10-016

DATE: DEC 3 1 2010

TO: ALL MEDI-CAL MANAGED CARE HEALTH PLANS

SUBJECT: REVISED FACILITY SITE REVIEW TOOL

PURPOSE:

The purpose of this Policy Letter is to establish health plan requirements for the implementation of the attached Facility Site Review (FSR) Attachment C. The Department of Health Care Services (DHCS) developed these requirements for the FSR Attachment C pursuant to Welfare and Institutions Code section 14182(b)(9). The existing FSR Tool (MMCD Policy Letter 02-02) remains in use and incorporates a new section, Attachment C, for assessing the level of physical accessibility of provider sites that serve Seniors and Persons with Disabilities (SPDs).

BACKGROUND:

A key element of California's Bridge to Reform 1115 Medicaid Demonstration Waiver, approved by the Centers for Medicare and Medicaid Services on November 2, 2010, is to provide SPD beneficiaries with access to care that is organized and coordinated. This includes the transition of SPDs into Medi-Cal managed care health plans that will commence on June 1, 2011. All health plans are required to meet this Policy Letter's requirements with the exception of County Organized Health System (COHS) health plans. COHS plans will be required to meet this Policy Letter's requirements commencing June 1, 2013; however, they are encouraged to begin on June 1, 2011. As a result of Welfare and Institutions Code Section 14182(b) (9), health plan contracts will be amended to include the new requirements regarding the use of the enclosed FSR Attachment C.

REQUIREMENTS:

Health plans are required to use Attachment C to assess the physical accessibility of provider sites, including specialist and ancillary service providers that provide care to a high volume of SPDs.

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In order to determine which specialists and ancillary providers serve a high volume of SPDs, health plans will be required by January 31, 2011, to submit to DHCS *initial* documentation of the following:

- The benchmark it has established to determine what constitutes high volume for each category of specialty and ancillary providers included in the health plan's provider directory,
- The methodology the health plan used to develop those benchmarks,
- A summary of the utilization or other data used to support the methodology,
- Any categories of specialty and ancillary providers that do not have enough utilization to qualify for high volume usage, and
- A list of the specific high volume specialty and ancillary providers for whom the health plan will administer the FSR Attachment C within the next 12 to 36 months.

DHCS will review this initial documentation and provide feedback to health plans regarding any areas of concern and required changes.

Thereafter, health plans will be required to submit updated documentation of the above by January 31 of each year indicating the changes made to the high volume benchmarks as a result of the availability of more complete utilization data. DHCS will continue to review these annual submissions and provide feedback to health plans regarding any areas of concern.

Health plans may also offer the opportunity for physical accessibility reviews to any provider that requests to be evaluated, regardless of whether they are determined to be high volume.

Health plans will be required to make the results of the FSR Attachment C available to members on its website. The information on the website must at a minimum display the level of access results met per provider site as either Basic Access or Limited Access and whether the site met the criteria of having Medical Equipment Access as defined in the FSR Attachment C. These results must also at a minimum identify whether each provider site has or does not have access in the following categories: parking, building exterior, building interior, waiting room/reception area, exam room, restroom and medical equipment (height adjustable exam table and patient accessible weight scales). The Attachment C portion of the FSR tool does not need to be conducted by a registered nurse or physician.

As with the existing attachments of the FSR Tool, health plans may delegate site review responsibilities to another DHCS contracted Medi-Cal managed care health plan or

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subcontract responsibilities to an appropriate agency/entity. Each health plan shall ensure that the surveys completed by the delegated entities are in compliance with site review requirements.

Policy Letter 02-002, in 1998, states that Health and Safety Code Section 1342.8 requires the streamlining of regulatory processes and the reduction in redundant reviews of offices of physicians by coordinating, to the extent feasible, as many of those regulatory functions as possible. In each county, health plans shall determine the collaborative processes, systems and methods that will be used locally to coordinate review process and decrease redundant site visits. Site review responsibilities may be shared equally by all health plans within a county, delegated to one or more health plans or individual physician practices (e.g., IPA), and/or subcontracted to other agencies/entities. All health plans are responsible for the coordination and consolidation of provider site reviews and therefore share responsibilities for defining the local process.

The results of the FSR Attachment C are informational and unlike FSR Attachments A (Site Review Survey) and B (Medical Records Review Survey) do not require a corrective action. However, health plans are required to maintain original documentation of its FSR assessments and must make this information available to DHCS for contract monitoring/auditing purposes.

IMPLEMENTATION TIMELINE:

Commencing February 1, 2011, health plans will be required to begin use of the FSR Attachment C with its existing providers at the provider's next scheduled FSR. Subsequent reviews are to be conducted every three (3) years as currently required.

If you have any questions regarding this Policy Letter, please contact your MMCD Contract Manager.

for Sincerely,

Tanya Homman, Chief Medi-Cal Managed Care Division

Enclosure: Facility Site Review (FSR) Attachment C

Physical Accessibility Review Survey California Department of Health Care Services Medi-Cal Managed Care Division

PCP Name:	Date of Review:
	Name of Reviewer:
Address:	Health Plan Name:
City:	
Phone: FAX:	Contact Person Name:
	Level of Access:
Basic Access: Demonstrates facility site access for the members with disabilities to parking, building, elevator, doctor's office, exam room and restroom. To meet Basic Access requirements, all (29) Critical Elements (CE) must be met.	□ Basic Access
Limited Access: Demonstrates facility site access for the member with a disability are missing or incomplete in one or more features for parking, building, elevator, doctor's office, exam room, and restroom. Deficiencies in 1 or more of the Critical Elements (CE) are encountered.	□ Limited Access
<u>Medical Equipment Access</u> : PCP site has height adjustable exam table and patient accessible weight scales per guidelines (for wheelchair/scooter plus patient). This is noted in addition to level of Basic or Limited Access as appropriate.	□ Medical Equipment is available .

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, W, R, and E). 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	and a start of		
$\mathbf{P} = PARKING$	Critical Elements (CE): 3, 7, 8		1.45	
EB - EXTERIOR BUILDING	(CE): 22, 31		1	
IB = INTERIOR BUILDING	(CE): 31, 34, 37, 53, 57			1
W = WAITING/RECEPTION	(CE): 34			
R=RESTROOM	(CE): 65, 67, 68, 71, 75, 77			
E=EXAM ROOM	(CE): 80, 85	-		÷
T = EXAM TABLE/SCALE	Medical Equipment Elements (ME): 81, 82, 83, 86			

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🛎 Criteria			
Criteria (CE = Critical Elements)	Explanation/Guidelines	Yes No N	A Comments

PARKI	NG		
1	Is off-street public parking available? (If no, skip to question 14.)	Self explanatory.	If no, skip to Q14
2	Are accessible parking spaces provided in off-street parking? (If no, skip to Question 14.)	Self explanatory.	If no, skip to Q14
3 3	Are the correct number of accessible parking spaces provided? 1 to 25 total spaces – 1 required 26 to 50 – 2 required 51 to 75 – 3 required 76 to 100 – 4 required 101 to 150 – 5 required 151 to 200 – 6 required 201 to 300 – 7 required 301 to 400 – 8 required	If there are 25 total parking spaces or less, at least one accessible space is required. If there are between 26 and 50 total spaces, at least two accessible spaces are required, etc.	

Question	Criteria (CE = Critical Elements)	Explanation/Guidelines	Yes	• No	N/A	Comments
4	Is the accessible parking space(s) closest to the main entrance?	The accessible parking space (s) should afford the shortest route of travel from adjacent parking to the accessible entrance.	77			
5	Is there an access aisle next to the accessible space(s)?	The access aisle is the space next to the accessible parking space where a person using the accessible space can load and unload from the vehicle.				
6	Is the parking space(s) and access aisle(s) free of curb ramps that extend into the space and other obstructions?	If a curb ramp extends into the parking space(s) or access aisle, a person using that space and aisle would not have adequate level space to unload and load from the vehicle.				

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Question	Criteria (CE = Critical Elements)	Explanation/Guidelines	Yes	No	N/A	Comments
7 (CE)	Do curbs on the route from off- street public parking have curb ramps at the parking locations?	Pathways should have curb ramps. Without curb ramps, wheelchair users may be required to travel in the street or behind parked cars where drivers cannot see them.				
8 (CE)	Do curbs on the route from off- street public parking have curb ramps at the drop off locations?	See above Question # 7.				
9	Does every accessible parking space have a vertical sign posted with the International Symbol of Accessibility?	Symbol in the illustration depicts the International Symbol of Accessibility.				

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15	Is the accessible route to the building entrance at least 36 inches wide for exterior routes from the following: (Please mark NA for those that do not apply.)	SIDEWALK MINCHES	
	a. Parking?	~	
	b. Public transportation?	-	
	c. Public sidewalk?		
16	Is the accessible route to the building entrance stable, firm, and slip resistant from the following: (Please mark NA for those that do not apply.)	An example of a stable surface is a floor or ground surface without loose elements like gravel or wood chips. Firm surfaces include solid concrete or pavement as opposed to a grassy, graveled or soft soil surface. Avoid glossy or slick surfaces such as ceramic tile.	
	a. Parking?		

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N/A

No

	b. Public transportation?			
	c. Public sidewalk?			
17	Is there an accessible route that does not include stairs or steps?	Self explanatory.		
18	Is the route to the entrance from the accessible parking spaces, including transitions at curb ramps, free of grates, gaps, and openings that are both greater than ½ inch wide and over ¼ inch deep?	Self explanatory.		
RAMP	s ····································		5	
19	Is an access ramp present? (If no, skip to Question 24.)	If there is more than one ramp, select the one that appears to be the primary access ramp.	 If no, skip to Q 24	

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Question #	Criteria (CE = Critical Elements)	Explanation/Guidelines	Yes	No	N/A	Comments
20 (CE)	Is each run (leg) of the ramp no longer than 30 feet between landings?	Each "run," shown in the white sections in the diagram below, must be no longer than 30 feet.				
21	Are 60 inches (5 feet) long, level landings provided at the top and bottom of each ramp run?	See Question 20 diagram above.				

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Question #	Criteria (CE = Critical Elements)	Explanation/Guidelines	Yes	No	N/A	Comments
22 (CE)	Are handrails provided on both sides of the ramp that are mounted between 34 and 38 inches above the ramp surface, if it is longer than 6 feet?	If the ramp is not longer than 6 feet, check NA.				
28 (CE)	Are all ramps at least 36 inches wide?	PASSAGEWAY MINCHES				

Criteria (CE = Critical Elements)	Explanation/Guidelines Yes	No N/A Comments
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BUILDING ENTRANCE		

24	Is the main entrance accessible with no stairs? (If yes, skip to Question 27)	Self explanatory.	If yes, skip to Q27	
25 (CE)	If a main entrance is not accessible, is there another accessible entrance?	Self explanatory.		
26	If a main entrance is not accessible, is there directional signage indicating the location of the accessible entrance?	ENTRANCE		



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30	Are there automatic doors?	If the doors open automatically, skip to question 32.	If yes, skip to Q32			
31 (CE)	Do entrance doors have handles that can be opened without grasping, pinching, or twisting of the wrist?	Can the door be opened by someone with a closed fist or fully open hand?, Door knobs, for example, cannot be used in this manner.				
	OR ROUTE (FROM THE BUILDING E GH THE CLINIC/OFFICE TO AREAS T	TRANCE TO THE CLINIC/OFFICE ENTRANCE, HAT PATIENTS COULD GO)	FO THE R	ECISTRATIO	N COUNTER/WINDOW, AND	
32	Is there an interior route to the medical office? (If no, skip to Question 40.)	Some medical offices are accessed directly from the street or parking lot rather than being located within a larger office building or complex, therefore they do not have interior routes.		lf no, skip to Q40		
-						



33	Is there an interior accessible route to the medical office that does not include stairs or steps?	Floors of a given story are level throughout the building, or connected by ramps, passenger elevators or access lifts.	
34 (CE)	Are <u>ALL</u> interior paths of travel at least 36 inches wide?	BOINCHES PASSAGEWAY	
35	Is the interior accessible route stable, firm, and slip resistant?	Avoid unsecured carpeting or other loose elements. It is easier for people using walkers , wheelchairs and other aids to walk or push on surfaces that have low pile carpeting without a pad underneath. Glossy or slick surfaces such as ceramic tile or marble can be slippery.	
36	Is the interior accessible route well lighted?	A brightly lit corridor will help avoid falls.	

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E Criteria		
* (CE = Critical Elements)	Explanation/Guidelines Yes	s No N/A Comments

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37 (CE)	If there are stairs on the accessible route, are there handrails on each side?	Check NA if there are no stairs and skip to Question 40.	If NA, skip to Q 40	
38	If there are stairs, are all stairs risers closed that are on the accessible route?			
39	If there are stairs, are all stair treads marked by a stripe providing a clear visual contrast to assist people with visual impairments?	Contrast striping must be provided on the upper approach and lower tread for interior stairs and on the upper approach and all treads for exterior stairs. Stripes must be 2" to 4" wide placed parallel to and no more than 1" from the nose of the step or upper approach. The stripe must extend the full width of the step or upper approach and should be made of material that is at least as slip resistant as the other stair treads (a painted stripe is acceptable).		
40 (CE)	If a platform lift is used, can it be used without assistance?	Check NA if there is no platform lift. Lifts sometimes require a key for operation, thus preventing independent use.		



No

41	Does the interior door to the medical office require less than 5 pounds of pressure to open?	Check NA if interior door is a fire door. For interior doors (not fire doors), labor force to open a door should be ≤ 5 lbs. Measure the weight of the labor force of the door after the door is unlatched; attach the hook end of the scale to the door handle and pull until the door opens and read the weight of the force.	
42	Is there a clear space 30 inches wide by 48 inches long in the waiting area(s) for a wheelchair or scooter user to park that is not in the path of travel?		
43	Is the path through the medical office free of any objects that stick out into the circulation path that a blind person might not detect with a cane?	If an object protrudes more than 4 inches and is located between 27 inches above the walking surface and below 80 inches, a blind person walking with a cane will not detect it.	

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44	If floor mats are used, are the edges of floor mats stiff enough or secured so that they do not roll up?	If floor mats are not in use, check NA. Floor mats that are not secured to the floor can roll up or bunch up under walkers or wheelchair casters and cause a tripping hazard.	-		
45	Is a section of the sign- in/registration counter no more than 34 inches high and at least 36 inches wide and free of stored items.	28 to 34 INCHES			
46	Does the office have a method, other than a lowered counter, by which people can sign in/register? (If yes, please note this method in comments.)	A medical office may use reasonable alternative methods to meet this need such as a clip board.			

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Question #	Criteria (CB = Critical Elements)	Explanation/Guidelines	Yes	No	N/A	Comments
51	Are all patient operated controls (e.g., call buttons, hand sanitizers) operable with one hand without grasping, pinching, or twisting to operate?	For example, a pump hand sanitizer that must be operated using two hands is inaccessible.	-			-
ELEVA	TORS					
52	Is there an elevator? (If no, skip to Question 62.)			If no, skip to Q62		
53 (CE)	If needed, is the elevator available for public/patient use during business hours?	Self explanatory.				



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No N/A

Comments



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Comments

58 (CE)	Do the buttons on the control panel inside the elevator have Braille and raised characters/symbols near the buttons?	Self explanatory.			
59	Is there an emergency communication system in the elevator? (If no, skip to Question 62.)	Self explanatory.	lf no, skip to Q62		
60	Is the elevator emergency communication system usable without requiring voice communication?	It is essential that emergency communication not be dependent on voice communications alone because the safety of people with hearing or speech impairments could be jeopardized. Visible signal requirement could be satisfied with something as simple as a button that lights when the message is answered, indicating that help is on the way.			



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		LEVER HANDLES
72	Are all dispensers mounted no higher than 40 inches from the floor?	Included are soap dispensers, paper towel dispensers, seat cover dispensers, hand dryers, etc.
73	Are all dispensers (soap, paper towel, etc.) operable with one hand and without grasping, pinching, or twisting?	Self explanatory.
74	If there is a pass-through door for specimen collection, is there a 30 inches by 48 inches space for a wheelchair or scooter user to park in front of it?	If there is no such door, check NA .



Explanation/Guidelines

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elines Yes

No

N/A

Comments

TOILET ROOM WITHOUT STALLS If there is no toilet room without stalls, check NA and skip to question 68. **32 INCHES** MIN CLEAR Toilet room without stalls: **OPENING** 75 Do toilet room doorways have a (CE) minimum clear opening of 32 inches with the door open at 90 CAL. degrees, measured between the face of the door and the opposite stop? Is the space inside the toilet room Self explanatory. 76 without stalls clear, without trashcans, shelves, equipment, chairs, and other movable objects?

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78	Is the space inside the accessible stall clear, without trashcans, shelves, equipment, chairs, and other movable objects?	Self explanatory.				
79	Can the hardware on the stall door be operated without grasping, pinching, or twisting of the wrist?	Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate.				
EXAM/	TREATMENT ROOMS/MEDICAL EQU	JIPMENT			ά.	



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81 (ME)	Is there a height adjustable exam table that lowers to between 17 inches and 19 inches from the floor to the top of the cushion?	Self explanatory
82 (M£)	Is there space next to the height adjustable exam table for a wheelchair or scooter user to approach, park, and transfer or be assisted to transfer onto the table?	
83 (ME)	Does the exam table provide elements to assist during a transfer (such as rails) and support a person while on the table? (if yes, please list in comments.)	Items that could help support a patient while on the table would be armrests, side rails, padded straps, cushions, wedges, etc.





Question #	Criteria (CE = Critical Elements)	Explanation/Guidelines	Yes	No N/A	Comments
86 (ME)	Is a weight scale available within the medical office with a platform to accommodate a wheelchair or scooter and the patient?	Accessible scales are usable by all people including: wheelchair users, people with activity limitations, and larger people who may exceed a standard weight scale limit. This includes people with conditions that interfere with mobility, walking, climbing, using steps (joint pain, short stature, pregnancy, fatigue, respiratory and cardiac conditions, post surgical conditions, orthopedic injuries); and/or who use mobility devices (e.g. canes, crutches, walkers).			

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

Page 36 of 37 December 2010 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"

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