County of Orange Social Services Agency
Family Self-Sufficiency & Adult Services Division/In-Home Supportive Services

Program/Area: In-Home Supportive Services
Title: Blind or Visually-Impaired (BVI) Recipient
Number: 1007 **Status:** Final
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PURPOSE

To offer and provide reasonable accommodations to Blind or Visually Impaired (BVI) IHSS applicants and recipients, when requested, to ensure access to the In-Home Supportive Services (IHSS) program and related information.

POLICY

As required by the Americans with Disabilities Act (ADA), the California Department of Social Services (CDSS) has developed forms and other types of communication formats and has made changes to the IHSS Case Management Information and Payrolling System (CMIPS II) to assist counties with their responsibilities to comply with ADA requirements.

Counties have an ongoing responsibility to ensure effective communication with BVI IHSS applicants and recipients by providing alternative formats for written program documents and materials.

Effective August 1, 2015, BVI applicants and recipients have the choice of alternative methods of receiving forms and Notice-of-Action (NOA). The new formats include large font documents, documents printed in Braille, and documents available via CD audio and data files. Because IHSS recipients are responsible for reviewing and approving their providers' timesheets, CDSS provided BVI recipients with the option to use the Telephone Timesheet System (TTS) to review and approve the timesheets over the phone.

Effective July 14, 2017, CDSS provided BVI recipients an option to use the Electronic Timesheet System (ETS) to approve or reject electronically submitted provider timesheets via smartphone, tablet, or personal computer. The ETS is optional for IHSS and Waiver Personal Care Services (WPCS) recipients and providers, and it fully replaces paper timesheets for recipients who opt to use the system.

DEFINITIONS

Americans with Disabilities Act
The Americans with Disabilities Act (ADA) was signed into law on July 26, 1990. The ADA prohibits discrimination and guarantees that people with disabilities have the same opportunities as everyone else to participate in the mainstream of American life -- to enjoy employment opportunities, to purchase goods and services, and to participate in State and local government programs and services.

Blind/Blindness
The degree of vision loss established in state and federal law as the basis of eligibility for governmental services such as Supplemental Security Income (SSI), Medi-Cal, and rehabilitation services. Legal blindness is about ten percent of normal visual acuity (20/20 eyesight), or a visual field limited to 20 degrees.

Visually Impaired/Visual Impairment

Visually impaired, also known as vision impairment or vision loss, is a decreased ability to see to a degree that causes problems not fixable by usual means, such as glasses. It is often defined as a best corrected visual acuity of worse than either 20/40 or 20/60. Visual impairment may cause people difficulties with normal daily activities such as driving, reading, socializing, and walking.

PROCEDURE

Reasonable Accommodations

1. The County of Orange has a continuing obligation to ensure effective communication with BVI applicants and recipients by providing alternative formats for written documents and materials to ensure access to the IHSS program.

2. IHSS Social Workers will provide all possible guidance to the BVI applicants or recipients to assist them in determining the best and most suitable method of receiving forms and NOAs and submitting provider timesheets.
   - This may include reading and completing necessary forms and, as required under Welfare and Institutions Code (WIC) Section 12304.6, directing and assisting the applicants/recipients to obtain community resources that can assist them in reading, comprehending, and completing the required IHSS documentation.

3. IHSS Social Workers will use information obtained from a BVI applicant/recipient's verbal statement that he/she is blind or visually impaired, the healthcare certification, SSI determination of blindness, or through the Medi-Cal eligibility process, such as the Medi-Cal aid code, to evaluate the individual's need for reasonable accommodation.

4. IHSS Social Workers will not require a BVI applicant or recipient to provide any additional medical documentation to verify his/her diagnosis of blindness or visual impairment.

5. IHSS Social Workers will confer with a BVI applicant/recipient during the assessment/reassessment to understand the individual's visual limitations that would require the need for reasonable accommodations.

6. IHSS Social Workers will proactively offer the appropriate accommodation options to each applicant or recipient who exhibits or mentions having functional difficulties with reading or seeing.

Alternative Formats

Options for The Blind Applicants/Recipients

1. Braille: Documents will be provided in the raised-dot Braille alphabet to allow blind individuals to read the documents.

2. Audio CD or Data CD (Text) Files: Documents are available as an audio file that will allow the blind applicants or recipients to hear the information as it is read or as a data (text) file that can be read to the blind applicants or recipients by a specially adapted computer software. The applicants or recipients must have the specialized equipment, such as a CD player, to utilize the audio files.

3. Telephonic Timesheet System (TTS): This system allows the blind recipients to complete and submit their provider timesheets electronically over the telephone using a 4-digit Recipient Authentication Number (RAN).

4. Electronic Timesheet System (ETS): This system allows the blind recipients to approve or reject electronically submitted provider timesheets via smartphone, tablet, or personal computer.

Options for The Visually Impaired Applicants/Recipients

1. Large Font Documents: Documents are printed in 18-point font to be easily read by visually impaired individuals.

2. Audio CD or Data CD (Text) Files: Documents are available as an audio file that will allow the visually impaired applicants or recipients to hear the information as it is read or as a data (text) file that can be read by a specially adapted computer software. The applicants or recipients must have the specialized equipment, such as a CD player, to utilize the audio files.

3. Telephonic Timesheet System (TTS): This system allows the visually impaired recipients to complete and submit their provider timesheets electronically over the telephone using a 4-digit Recipient Authentication Number (RAN).

4. Electronic Timesheet System (ETS): This system allows the visually impaired recipients to approve or reject electronically submitted provider timesheets via smartphone, tablet, or personal computer.

Forms

Counties must provide the following forms to the BVI applicants or recipients, when BVI accommodation is required:

1. Notice of Action (NOA) in 18-point font, Braille, or Audio/CD data (text) format in English, Spanish, Chinese, and Armenian languages. CD audio format in English and Spanish languages.

2. Application for Social Services (SOC 295L) and Needs Assessment (SOC 293L) forms as they have been modified to include new sections to identify the blind or visually-impaired limitations and to document the reasonable accommodation preferences requested by a BVI IHSS applicant or recipient.

3. IHSS Arrears timesheet (SOC 2261L) in 18-point font.

4. IHSS Recipient/Employer Responsibility Checklist (SOC 332L) in 18-point font.

5. IHSS Health Care Certification Form (SOC 873L) in 18-point font.

6. IHSS Notice to Applicant of Health Care Certification Requirement (SOC 874L)

7. IHSS Notice to Recipient of Health Care Certification Requirement (SOC 875L)

8. IHSS Notice of Provisional Approval – Health Care Certification Exception Granted (SOC 876L)

9. Any County forms in 18-point font when a visually impaired applicant or recipient requests it.

BVI Accommodations Documentation

1. IHSS Social Workers must document the reasonable accommodation preferences requested by a BVI applicant or recipient on the revised SOC 295/SOC295L and/or SOC 293/SOC 293L form.

2. IHSS Social Workers should document in CMIPS when no accommodation is needed.

REFERENCES

All County Information Notice No. I-25-15: *Additional Reasonable Accommodations Available to Blind or Visually Impaired (BVI) In-Home Supportive Services (IHSS) Applicants and Recipients to Ensure Access to the IHSS Program as Required by the Americans with Disabilities Act (ADA)*

All County Information Notice No. 15-60: *Implementation of Blind and Visually Impaired (BVI) Recipient Reasonable Accommodations and Tracking in Case Management, Information, and Payrolling Systems (CMIPS II) and Telephone Timesheet System (TTS)*

All County Letter No. 19-36: *Release of Additional Reasonable Accommodation Information and Resources for Blind and Visually Impaired (BVI) Applicants and Recipients*
