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June 25, 2013

Mr. Peter Lee, Director, Covered California

Mr. Len Finocchio, Associate Director, Department of Health Care Services

Ms. Karen Ruiz, CalHEERS Project Director

Mr. Keith Ketcher, Accenture Project Manager

Ms. Terri Shaw, Consultant

Re: Consumer Web Portal - Covered California

Dear Mr. Lee, Mr. Finocchio, Ms. Ruiz, Mr. Ketcher and Ms. Shaw:

Thank you for the opportunity to review and comment on Covered California's demonstration of the web-based consumer portal.

We commend Covered California, the Department of Health Care Services, and their partners in designing a consumer web portal that strives to provide a streamlined eligibility and enrollment process that will enable consumers to access coverage accurately, smoothly, and efficiently. We are very pleased to see several components of the web portal that will go a long way toward achieving these goals including:

- The ability to browse the website without logging in or disclosing personal information;
- Assorted tools for assistance
 - The I, ?, and * info at the top of the pages and within the fields;
 - Ability to vary the font size
 - Learn feature
- A save and exit button so people can leave the site and not worry about losing all the data;
- The ability to override pre-populated data;
- Pre-populated forms created from user-generated information (during the log-in and creating an account process);
- Easy to follow step by step directions and ability to enter information for multiple people with different needs at the same time;
- The ability to toggle between the Spanish and English versions;
- Introduction pages for each section including:
 - A brief overview
 - A right-hand side navigation bar that identifies for consumers what information will be needed for each section
- Ability to easily scroll (two different functions) to quickly view health plan offerings;
- Displaying quality measures on the same screen as total estimated cost;

- Displaying plans via a “smart sort” function, utilizing cost and quality;
- Progress bars, both at the top of each page, as well as the check marks in the left navigation bar for each section;
- Summary pages showing the user what they have entered at the end of each section;
- Running tally of income as it gets entered on the screen;
- Video tutorials to help educate ordinary consumers, including those with low health literacy, about complicated health insurance terminology; and
- Ability to filter or customize search results by identified preferred providers.

These smart design features will enable consumers to navigate more easily through a complex set of instructions and questions.

While we appreciate all the work that’s been done to date, below we outline several recommendations and suggestions that we believe will significantly enhance the consumer experience for all web portal users:

I. Access for Limited-English-Proficient (LEP) and persons with disabilities:

Below are several recommendations for how CalHEERs could enhance the user experience for Limited English Proficient (LEP) and persons with disabilities in California:

- **Taglines in at least the Medi-Cal Managed Care threshold languages** – The best approach to notifying consumers of no cost oral interpretation in a person’s primary language is by including taglines in threshold languages on a navigation bar at the bottom of every page, as is being done now on the new healthcare.gov website (initially 13 languages including Spanish, with a commitment to add more languages in the future). Consumers could click on the tagline in their primary language and be taken to a page that would contain more information in that language with a number to call for help. There appear to be several places where the taglines could go including the side or even bottom of the home page.
- **Use of Icons to signify assistance in different languages and alternate formats** – We recommend that Covered California stick with the language navigation drop down menu on the current Covered California website to direct people to applications, fact sheets, consumer assistance and other information in their primary language. The drop-down menu language options should be written in the primary language characters so people can access the support materials in their native language, as is modeled on the new healthcare.gov website. This is a cost-effective solution (as it has already been built into the site) and also one whose value can be easily measured by the number of fact sheet downloads that occur in other languages. The Board could request such a report at future

meetings, as well as a report on the types of consumer feedback Covered California receives on the translated fact sheets.

If Covered California believes an icon is necessary in addition to the taglines and Language navigation tool bar currently in use, we would recommend an icon similar to the one below, that shows the languages for which written translations are available, written in the appropriate characters from each language (as shown below). It would be helpful in that instance if there was an “other” category for non-threshold languages and sign language. Unfortunately the globe icon by itself is not immediately intuitive as to its purpose. It is difficult to come up with a symbol that is meaningful across cultures, therefore we are not recommending the use of the stand-alone globe icon at this time.



- **Translated Applications** – We request clarification as to where translated applications will be housed on the web portal, as this was not addressed during either of the webinars. Clear language needs to be displayed that alerts the user to the fact that paper applications are available in other languages. We also continue to urge Covered California to make the online web-based application portal available in additional languages, starting with Chinese, which is the next most prevalent Medi-Cal language after Spanish.
- **Preferred mode of communication** – The language displayed during the webinars is not recommended for the two questions regarding written and spoken language preference. Consumer groups recommend that DHCS and Covered California use the Healthy Families application questions below to ask about written and spoken language preference for both the online and paper applications:
 - In what language do you want us to speak to you?
 - In what language should we write to you?

We would appreciate that when a person checks either of these preferred mode of communication boxes, that a pop-up window or other tool appears that informs consumers that they can get free help in their native language.

- **Preferences for persons with disabilities** – At an AB 1296 meeting advocates had with DHCS and Covered California in late May, we understood that staff agreed to add questions about communication preferences for persons with disabilities, that have not been included in the web portal as far as we could see.¹
- **Video Tutorials** – We understand Covered California must prioritize competing needs and internal capacity to meet a very aggressive deadline. We respectfully request that Covered California develop video tutorials in threshold languages including sign language. We think this is a smart initial investment that will save money down the line by cutting down on the need for more costly telephonic and/or in-person assistance for LEP and hearing impaired populations.

II. Tools to facilitate understanding and improve efficiency:

Below are several suggested changes or additions to the tool functionalities:

- **Insurance Affordability Program Screen** – When displaying the “opt out” for insurance affordability programs, the web portal should have more tools and explanatory language, not just a check box. The federal website has explanatory language in a number of places and encourages the applicant to use the calculator or get screened just in case. We don’t want applicants to check “no” who are eligible, so this is an important component that may need to be repeated at several places on the website;
- **APTC screening tool** – The tool for determining subsidy eligibility (currently “APTCs”) should not be set to the side so that it is optional. Also we are concerned with the default in the computation to a person taking the full amount of the tax credit. We would recommend you make the click through worksheet on APTCs more prominent. Perhaps don’t pre-populate the tax credit subsidy in the computation at all and instead put a “You are eligible for help paying your premiums - click here” in the equation. There, the link would be embedded to a separate APTC page with explanatory language etc. There you could have the customized full subsidy set up and a slider to adjust the amount of monthly credit that person wishes to take. We were not able to read the

¹ For example, questions such as: “If you have difficulty hearing spoken language or speaking, what translation assistance do you need for effective communication;” “If you have difficulty (even with glasses) seeing, reading, or understanding written language, what alternative format do you need for effective communication?”; and “Do you have difficulty concentrating, remembering, or making decisions due to a physical, mental, emotional, or developmental condition?” A non-exhaustive list of examples of “translation assistance” and “alternative formats” should accompany the above questions, as a page link or accessible “drop down menu” from the online application, and in the accompanying instructions in paper applications

language explaining how the tax credit works, but would like to review it in more detail;

- **Help Tools** – We appreciate the help tools, but are concerned that they were too limited. There are many places on the website that could use additional help tools or snippet information that explains complicated terms or helps users understand what is being asked of them.

III. Language and Readability:

We understand the demonstration at the Board meeting did not reflect the results of research conducted by NORC about key words and phrases, so look forward to seeing those incorporated into the next version. In addition to key words and phrases, there are a number of language choice and readability issues we'd like you to consider:

- **"Maintain"** section of the portal – We appreciate the idea that there is a section that users will have access to once they are enrolled in coverage. Our issue is with the label for that section, "Maintain." The word gives the impression of a time and management tool and may deter people from reviewing their account information on a regular basis. It is unclear that the word "Maintain" refers to a person's account. We think that "My Coverage" would be better language for that section to communicate more clearly to users what is incorporated into that area of the portal;
- **Gender designation** – Drop down options for gender are too narrow. We have raised this issue in our comments during the AB 1296 process. With the dynamic nature of the website, we don't understand why there can't be additional questions regarding sexual orientation and gender identity, as suggested by advocates.
- **Word Choice** – Complicated one or two word concepts may need to be broken down into longer sentences, with explanations. Examples include "exemption," "disposition," "incarcerated," "remuneration."
- **Glossary** – A glossary icon should be visible and readily available on each page. Additionally, will the glossary be available in Spanish and other languages, which can be accessed directly through the web portal?
- **Privacy and security language** – From what we could see during the limited presentation, we didn't readily see any privacy or security language before a person enters in personal information.

- **Language about limitations on cost-sharing reduction** – The information about access to the cost-sharing reduction being linked to a silver plan ONLY was not displayed anywhere we could see. While we appreciate that the smart sort will consider that information when displaying plan choices, there needs to be warning language attached to any plan that is not silver that alerts the user that she is about to choose a plan that would prohibit her from accessing the cost-sharing she is eligible for.

IV. Other important issues:

- **Action required** – On the determination page, it was indicated that “action required” would articulate what paper documentation was required in cases of reasonable compatibility. Under the federal rules, Covered California has to provide the opportunity for the applicant to offer a reasonable explanation of the incompatibility. There was no place that we saw on the site that provided a place for the applicant to write-in her explanation, before being required to provide documentation.
- **Certified enrollment counselors** – From what we could see, there was a dearth of information about the availability of help *at no charge*, through certified enrollment counselors. This should be prominently displayed on every page, in addition to the top navigation bar “Find Help Near You” button, with a link to a page where a user could search a specific region for a list of no cost certified enrollment assisters in the area, including identification of those whose services are available free of charge for consumers (Navigators) and exactly what languages are spoken by each of the certified enrollment counselors (there could even be a filter to filter by language spoken).

In addition to prominent displays on each page, there are help tools that could also provide information about free assistance. For example, when a user hits the “save and exit” button, there should be a text box that opens up that says something like “if you are leaving because you are having difficulty filling out this application, you can get free help with the rest of your application. Click here to find out free services available in your areas” with a live link to a list of Navigators in the area.

Some additional suggestions that we have, which may have already been answered with the design details that we were not able to see during either of the webinars, given the brevity of the demonstrations:

- **Materials needed** – a full list of materials needed to complete the application could be available at the introduction to the first page of the application section. To make it less overwhelming, it could be a separate link or a dynamic tool that

you click on to bring down the list (similar to the dynamic tool that was displayed when you click you have other legal immigration status)

- **Multiple accounts, same household** – an ongoing issue is what happens when there are two people that create accounts who belong in the same household? Can the two accounts later be combined? If they are separate accounts in separate households, but then become one household, will the function allow for that combination or will they need to maintain the separate accounts? The issues that were raised during the Board meeting public testimony of how the system will deal with two separate tax households in the same family, prevalent with LGBT families, also needs to be addressed.
- **Income Deductions** – We would like to review the detailed page that outlines information gathered for income deductions, since that page was not displayed during the webinars.
- **Open Enrollment** – We like the suggestion made during public testimony to have a clock or other symbol that ticks off the number of days left for open enrollment that streams at the top of every page. It should be positioned on the web page prominently like the clock on CoveredCA.com, but provide accurate information about when open enrollment begins and when it closes, like the clock on healthcare.gov.
- **Spanish application** – We would like information from Covered California whether applicants using the Spanish application will be able to respond to application questions in Spanish, since that page was not displayed during the webinars.
- **Referral page** – We appreciate the referral for other services, located on the summary page, and would be very interested in seeing what information and programs will populate on the referral page link.
- **Demographic data** – We would like to see what demographic data Covered California is planning to collect, as in both webinars, we did not see a screen shot of what information would be collected.

We understand the important deadlines of Covered California and have no interest in compromising the ability to open the doors in October 2013. We believe, however, that many of our recommendations should be implemented in order to serve consumers accurately and fairly. Once again, we appreciate having the opportunity to review and comment on the consumer web portal. We look forward to further viewing and would be interested in discussing any of the above identified issues with you in more detail at your earliest convenience. For further information, contact Julie Silas (415) 431-6747 or Cary Sanders (510) 832-1160.

Sincerely,

Cary Sanders, California Pan-Ethnic Health Network
Julie Silas, Consumers Union