

Policy Clarification #PC000291

COMPLIANCE WITH THE ADA AND SECTION 504 OF THE REHABILITATION ACT

February 25, 2025

To: Iowa Medicaid Managed Care Plans

This letter is a formal notification of the state's expectations related to the operations and implementation of Iowa Medicaid under the managed care program. This purpose of this letter is to do following:

- ☐ Provide formal guidance
- ☒ Clarification of existing Iowa Medicaid policy
- ☐ Guidance on new process or policy
- ☐ Request for information

The purpose of this letter is to provide Iowa Medicaid requires its contractors to comply with the Americans with Disabilities Act ("ADA") and Section 504 of the Rehabilitation Act ("Section 504") in providing services to Iowans. Recently, Iowa HHS signed an Interim Memorandum of Understanding (MOU) with the National Federation of the Blind, Jerad Nylin, and Wade Hemmelrick. The MOU reiterates Iowa HHS's commitment to compliance with the ADA and Section 504, as well as to providing accessible documents and information to Blind and seeing-impaired individuals. This Policy Clarification emphasizes Iowa HHS's expectation that contractors comply with these important laws in serving Blind and seeing-impaired Iowans.

Specifically, it is Iowa Medicaid's expectation that MCO contractors will comply with Sections VII(a), VII(d), and IX(h) of the attached MOU.

Sections VII(a) and VII(d)

Section VII(a) of the MOU requires HHS and its MCO partners to provide documents in accessible formats when requested by Blind or seeing-impaired individuals. Further, the MOU requires that documents translated into Braille or other accessible formats are mailed within seven (7) business days or emailed within two (2) business days of a request being made. Section VII(d) requires that Iowa HHS ensure contractor compliance with Section VII(a). Please review both sections of the attached MOU.

Section IX(h)

Section IX(h) requires Iowa HHS to notify its MCO contractors of its expectation that all public-facing websites shall be and remain in compliance with the ADA and Section 504.

Related Policy Clarifications:

This policy clarification should be used in correlation with the following policy clarifications: N/A

This formal guidance impacts capitation rates in the following manner:

- ☐ This [is was] an Iowa Medicaid practice prior to April 1, 2016 and was included in the experience used to develop the capitation rates.
- ☒ This is a new process or policy that does not have a fiscal impact.
- ☐ This is a new process or policy that will be reflected in revised capitation rates and implemented July1, 2021.

Attestation:

I hereby attest to receipt and understanding of this communication including all requirements and due dates.

Name _____ Date _____.

The department will monitor progress towards implementation and may impose remedies for failure to implement.

Sincerely,

Contract Manager
Managed Care Account Manager