

A Top 3 Health Insurance Company's Journey to Accessible Documents

A Case Study

Background

This fast-growing Health Insurance Company is the leading information and technology-enabling health services organization, dedicated to modernizing the health care system and helping it work better for everyone.

This Company works with a diverse set of clients across 150 countries – from those who diagnose and treat patients to those who pay for care, deliver health services, and those who supply the cures. This Insurer maintains operations across North America, South America, Europe, Asia Pacific and the Middle East.

With more than 160,000 people worldwide, this organization delivers intelligent and integrated solutions that help to modernize the health system and improve overall population health, enabling unprecedented efficiency.

The Problem

The Section 508 ICT Refresh was effective January 1, 2018 and, for the first time, documents and PDF files were specifically included in the scope of the mandate. Section 508 of the Rehabilitation Act applies specifically to U.S. Federal entities and programs and in healthcare. This translates to Medicare and TriCare health plans, therefore, many major

U.S. health companies – both payer and provider - are impacted. Additionally, the Affordable Care Act (ACA) also contains anti-discrimination mandates in Section 1557, that also lists digital accessibility as a must-have for health plans operating under the ACA.

Lastly, the number of federal lawsuits under the ADA for website access have been skyrocketing, with 2018's number of suits reaching over

10,000. Therefore, the litigation and regulatory landscape for making website content and key documents accessible has prompted action at major health companies across the U.S.

The challenges of making health-related documents accessible are varied, but break down into these main categories:

- Time to market. Traditional manual approaches are by nature slow, and result in slower service levels for people with disabilities, which is often seen as being discriminatory
- Wide variability of document types and complexity. The sheer volume and complexity preclude a one-size-fits all solution to the problem, causing many companies to default to completely manual solutions which exhibit the slow service levels and high costs mentioned above
- Lack of in-house expertise with document tagging strategies
- Decentralized content authorship, lack of consistent approaches to accessibility
- PHI considerations arise if using outside assistance



The Challenge

- Time to market and elimination of delays
 - There was no time for delays, and due to the above-mentioned regulations, customer demand and satisfaction, they needed to deploy a solution that remediated static content in hours, and personal/transactional content on-demand
- Complexity
 - Growing through acquisition and with many, many systems that generate content that needs to be accessible, any document accessibility solution implemented would need to be flexible enough to account for this variety and variability
- Broad spectrum of content.
 - Some documents are generated by people using desktop tools
 - The majority of the volume is generated by a variety of systems, applications and programs and stored in several content systems

Any solution would need to accommodate all these requirements, consolidate the resulting remedy from a single source so that risk could be managed, timelines collapsed and resolving customer demand issues could be accomplished in the shortest possible time.

Vendor Selection

A Request for Information (RFI) was distributed to 6 potential vendors resulting in 4 potential vendors being shortlisted. Then, a comprehensive test was created. The Health Insurance Company supplied a sample untagged document and required a document to be returned that was tagged and conformed to

Web Content Accessibility Guidelines (WCAG) standards. No assistance was given to the prospective vendors.

In addition to the results of the test, a comprehensive evaluation of each vendor's high-volume solution was undertaken. Crawford Technologies was the selected vendor.

Vendor Selection

6 vendors
4 shortlisted
Comprehensive Testing

CrawfordTech Stood Out

- ✓ Honest
- ✓ Timely
- ✓ Responsive
- ✓ Focused

Health Insurance Company's Manager of Digital Accessibility

The Solution

CrawfordTech was chosen to assist in making both transactional and static documents accessible and WCAG compliant due to the Section 508 ICT Refresh and ACA non-discrimination mandates.

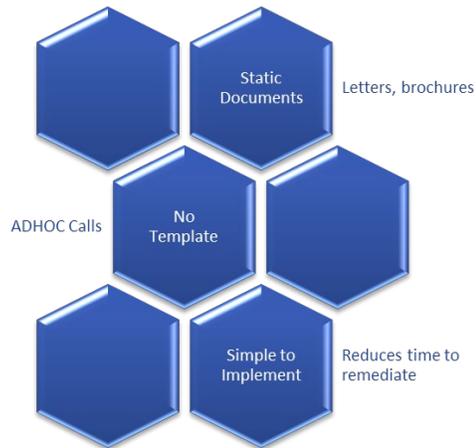
The decision was made in order to take advantage of CrawfordTech's comprehensive AccessibilityNow platform of software and services.

The First Deployment

- AccessibilityNow Publisher (formerly Auto Tagger for Accessibility) makes plan brochure documents accessible, getting approximately 60-70% tag completion rates
- AccessibilityNow Publisher enables the ability to react quickly to demands for accessible documents

- CrawfordTech then provides tag-finishing and QA services for those documents as a service in CrawfordTech’s AccessibilityNow Center in New York

AccessibilityNow Publisher



- AccessibilityNow Transactional was also implemented to dynamically make millions of transactional documents accessible, in real-time and on an ad hoc basis
 - The solution is installed on the Insurer Company’s web tier
 - When a user requests an EOB or Invoice, a service request is made to CrawfordTech’s middleware component that dynamically calls the transform to accessible PDF, and the tagged, accessible document is handed back to the requesting service and ultimately the end user at the portal
 - Once the transformation template is created – the process is completely automatic without any manual intervention required

The combination of AccessibilityNow Publisher along with CrawfordTech’s tag completion services for static documents and AccessibilityNow Transactional provide a single platform for all document accessibility needs.

A small dedicated team was established to manage the activity.

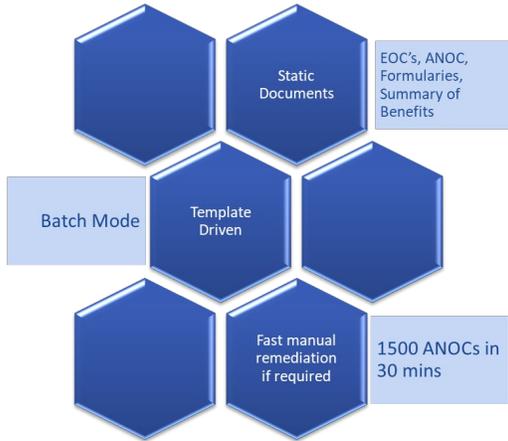
- Hired a Manager who knew about PDF and Accessibility standards
- Started a program to identify document inventory and organizational needs
- Hired 1 person with Accessible PDF experience
- Purchased tooling (AccessibilityNow Publisher)
- Hired 2nd person – contractor to augment document accessibility manual remediation

Initial rollout included AccessibilityNow Publisher to handle static documents. This solved the accessibility issue with letters, brochures, other correspondence, plan user guides and plan descriptions. AccessibilityNow Publisher was simple to implement, quickly used by the Insurance Company’s team and dramatically reduced the time needed to remediate any document that could not be addressed by a template.

The next step in the overall deployment was the acquisition of CrawfordTech’s AccessibilityNow Transactional solution, including AccessibilityNow Designer to create the business rules used in processing.

AccessibilityNow Transactional is deployed in both a dynamic mode, in which documents are pulled from repositories and transformed “on-the-fly” and in batch mode where documents are batch-converted to accessible PDF. Dynamic mode was used to process Explanation of Benefits (EOB’s) and batch mode was used to process Evidence of Coverages (EOC’s), formularies and Summary of benefits, (SOB’s).

AccessibilityNow Transactional Hybrid (Batch Mode)

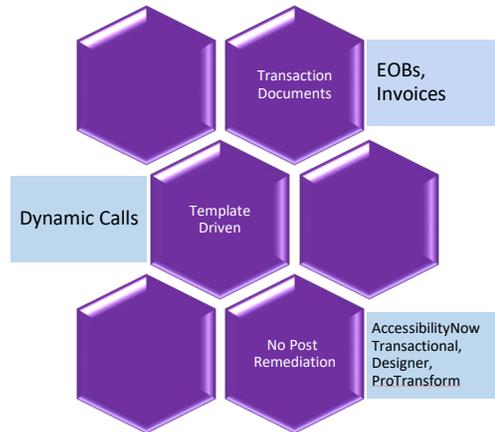


To facilitate dynamic processing, the AccessibilityNow Gateway solution was deployed as the integration platform that handles the connection between the Health Insurance Company's document repositories and the AccessibilityNow Transactional engine.

Ultimately, the overall process provides for dynamic conversion of each requested EOB in less than a second, and the batch creation of 1500 accessible ANOCs in 30 minutes – a significant improvement over the previous strictly manual process.

This automated installation allows member users the ability to request accessible documents on a self-service basis, eliminating the need for manual intervention, coordination with a call center or interacting with member services.

AccessibilityNow Transactional Full Automation



It is completely template driven, requires no post remediation and encompasses the highest number of documents produced – EOBs and invoices.

Summary

Within 9 months, the Health Insurance Company and CrawfordTech's consolidated team of specialists was able to develop and implement a world class document accessibility program that is currently in use today.

TIMELINE

