



## ***Consumer Communications— Eligibility Determination Notice***

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***May 13, 2013  
Connect for Health Colorado Board Meeting***


# Scope

## A notice, as defined by Connect for Health Colorado is:

- Formal written letter or e-mail correspondence to our customers to inform them of a consumer or marketplace initiated action.
- Notices are intended for the consumer's record keeping purposes and does NOT include all messaging that occurs on the user interface.
- Users will be able to see all notifications they have received from Connect for Health Colorado through their user account.

# Scope

## Consumer Communication “Buckets”

Account Creation and Maintenance	Broker Certification/ Client Authorization
Assistance Site / Health Coverage Guide Certification	Eligibility / Verifications 
Enrollment	Mid-Year Changes
SHOP Billing	Disenrollment
Annual Eligibility Redeterminations	Appeals

# *Eligibility Determination Notice*

Information communicated by the marketplace related to a determination or re-determination of eligibility for the advance premium tax credit and cost-sharing reductions.

## **Requirements** (ACA Sections, 1411, 1413 & 2201, 45 CFR Part 155)

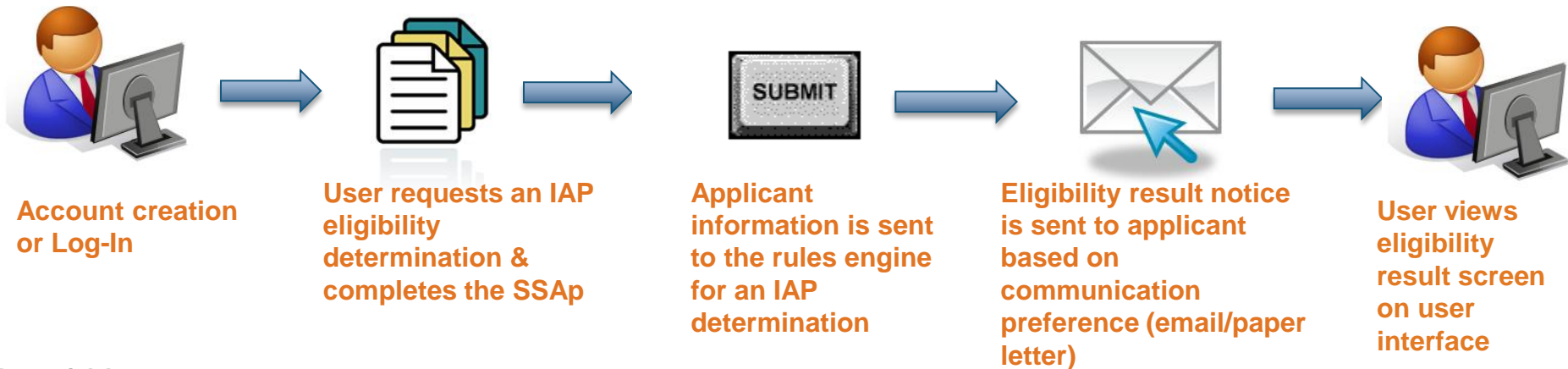
- Must provide the determination and relevant facts
- Citation to specific regulation
- Explanation of appeal rights
- Delivery method can be either electronic or post mail

## **Coordination of Insurance Affordability Program Eligibility Notices**

- In accordance with the Jan. 2013 NPRM, Connect for Health Colorado and the Department of Healthcare Policy and Finance will coordinate eligibility determination notices
- In 2015 the proposed federal requirement is to ensure a single communication that delivers an eligibility determination across all IAPs

# Notice Trigger

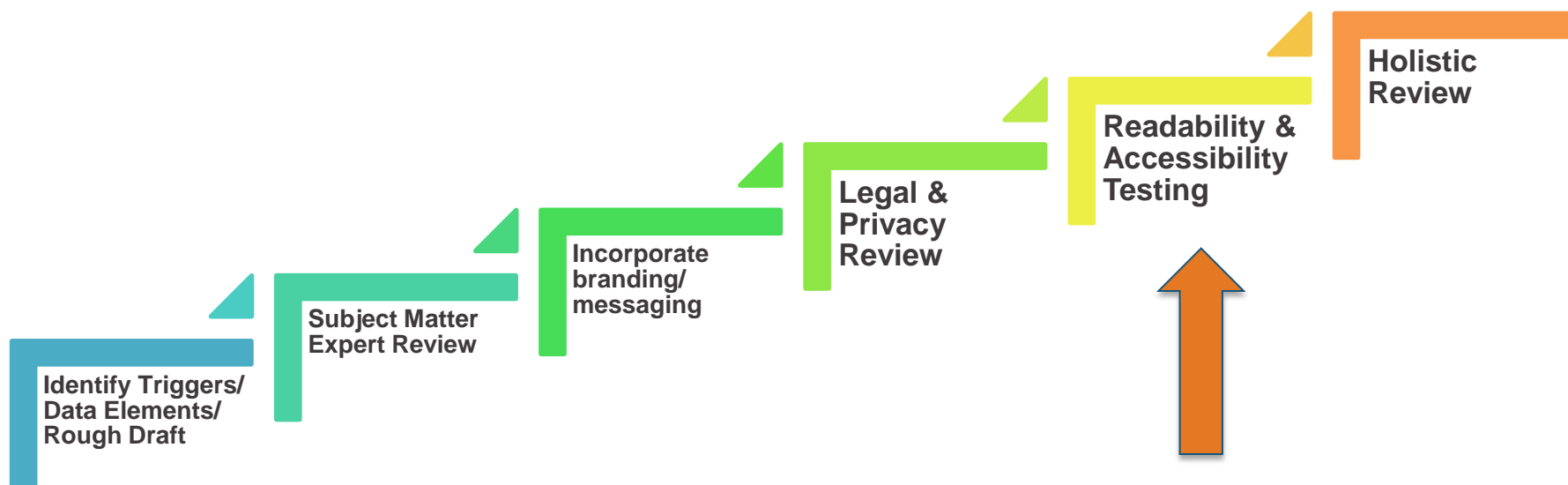
A user has submitted the Single Streamlined Application (SSAp) for an Insurance Affordability Program (IAP) either during annual enrollment or through reporting a life change. The rules engine has been run and an eligibility determination has been made (data verifications may or may not be pending).



## Potential Actors:

- Individual  
(self service or with a Coverage Guide)
- Back Office/Service Rep/Broker  
(on behalf of)

# Approach



*Note:* English language notices will be translated into Spanish after the Holistic Review.

# Feedback

- **Concise vs. Comprehensive.** Are there sections of the notice that aren't needed? We are trying to balance providing the right information vs. providing too much information.
- **Clear understanding of the message.** Are there sections/words of the notice that could be better developed or formatted for clarity?
- **Message Placement.** Any concerns or comments on message placement?
- **General Comments.** What do really like about the sample notice? What don't you like?

# Feedback

- Stakeholders were very happy with the information included under “Important Connect for Health Policies”
- Provide the applicant with the most important information on the first two pages (e.g. determination, relevant facts, and appeal rights)
- Change “Effective Date” to “Decision Date.”
- Appeal Section:
  - Provide consumer with information needed in the written request
  - Provide the fax number to send appeal request
  - Provide information that an appeal will affect what others in the household qualify for
  - Provide ADA rights
  - Leverage the appeal language used in State eligibility notices
- Clarify next steps for plan enrollment
- Include contacting a broker in the consumer assistance paragraph
- Request to move the Legal Reference to the first page



# *Next Steps for Go Live Notices*

## **Collaboration (ongoing)**

- Incorporate stakeholder feedback
- Continue to gather lessons learned from our federal partners and their health literacy consultants (also awaiting final guidance)
- Continue to work collaboratively with HCPF on coordinating eligibility notices for 2014 benefit year and the roadmap for combined notices in 2015



## **Readability & Accessibility Testing (April-May 2013)**

- Ensure our notices meet readability and accessibility requirements
- User testing
- Screen reader testing

## **Holistic Review (May-June 2013)**

- Approve notices for system testing and Go Live

# Developing Accessible Health Materials

*Writing is more art than science. Our goal is to make the material as readable as possible.*

## Three Steps to Creating Quality Materials

### 1. Develop

- Plain Language
- Logical Organization
- Clear Layout and Design
- Full Accessibility

### 2. Assess

- Reading Level Analysis
- Accessibility Review
- User Review

### 3. Rewrite



# Status

- Completed review, assessment and revision of an initial draft of the Individual Eligibility Notice
  - Focus on readability
  - Incorporated feedback from stakeholders
- Created three accessible versions of the notice (Word, PDF, Web)
- Partially completed user testing and expert review
  - ✓ Automated analysis of accessibility errors
  - ✓ Testing with Screen Readers (Jaws, NVDA, Window Eyes)
  - ✓ Testing with individuals who use Screen Readers
  - Readability testing with individuals with mild intellectual disabilities

# Results

Document Title: DRAFT Indiv Elig Notice for CU Updated 3.6.13

Counts	Online-Utility	Edit Central	Gunning-Fog	Dale-Chall	Averages:	FRY
Number of characters (without	6552.00	6687.00			Characters	6,619.50
Number of words :	1286.00	1262.00	1263.00		Words	1,270.33
Number of sentences :	66.00	70.00			Sentences	68.00
Average number of characters	5.09	5.17			Characters/Word	5.13
Average number of syllables per	1.84	1.67			Syllables/Word	1.76
Average number of words per	19.48	18.03			Words/Sentence	18.76
Number of major punctuation			74.00		Punctuation Mar	74.00
Number of 3+ Syllable Words		222.00	242.00		3+ Syllable Words	232.00
Gunning Fog index :	14.48	14.20	14.49		Gunning-Fog	14.39
Coleman Liau index :	12.67	13.00			Coleman-Liau	12.84
Flesch Kincaid Grade level :	13.72	11.10			Flech Kincaid RL	12.41
ARI (Automated Readability	12.31	11.90			ARI	12.11
SMOG :	13.81	12.80			SMOG	13.31
Flesch Reading Ease :	31.41	47.50			Flech Reading Ea	39.46
Dale-Chall				9-10		

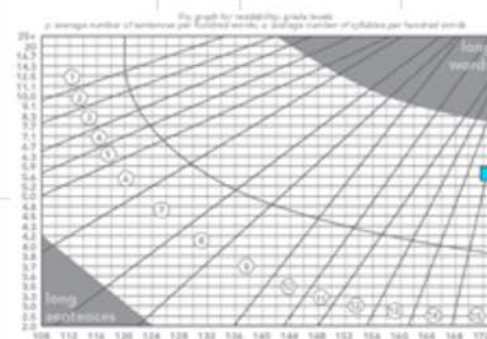
## Recommendations for Repair:

You are obligated to contact us if: You are no longer a resident of Colorado; Your income changes; Your household changes, for example you marry/divorce, become pregnant, or have children; You become qualified for other health insurance, for example Medicare or Medicaid or are offered Program Eligibility Individual Name Application Date Effective Date/Month Lower Co-pays/Deductibles Ineligible Reason Over-income Ineligible Reason Over-income Ineligible Reason Over-income Based on the information received from our State

## Difficult Words:

additional, Administration, affordable, already, application, Assistance, available, benefit, benefits, calendar, co-insurance, Colorado, communication, Conference, Continuation, contribute, co-pay, co-pay/deductible, co-payments, Co-pays, coverage, Customer, decision, deductible, Deductibles, determination, different, directly, disability, disagree, Discrimination, documentation, documents, Effective, electronic, Eligibility, eligible, Enrollment, every, explanation, Federal, finalize, high, household,

## Fry Graph:



# Results

## Milestone draft of the Individual Notice

- 8<sup>th</sup>-9<sup>th</sup> Grade Level
- Some Technical Terms Remain
- Passed all automated accessibility tests
- Passed internal screen reader testing
- End user feedback from screen reader users includes

Positive	Constructive
Very readable	Provide table summaries
Use of lists and headings	Improve graphic labels
Document organization	Remove merged cells from tables

- ✓ Each participant felt the documents were accessible.

# Next Steps

- Complete testing with individuals who have mild intellectual disabilities
- Garner feedback from constituencies
- Incorporate findings into the revision process
- Apply lessons learned to the mixed family notice
- Provide final results to Connect for Health Colorado for holistic review