

Checklist for CCO Marketing Materials



Definitions

- **Marketing:** [42 CFR 438.104 \(a\)](#) defines marketing as “any communication, from a [CCO] to a Medicaid beneficiary who is not enrolled in that entity, that can reasonably be interpreted as intended to influence the beneficiary to enroll in that particular [CCO’s] Medicaid product, or either to not enroll in or to disenroll from another [CCO’s] Medicaid product.”
- **Marketing materials:** [42 CFR 438.104 \(a\)](#) defines marketing materials as “produced in any medium, by or on behalf of a [CCO]; and can reasonably be interpreted as intended to market the [CCO] to potential enrollees.”

Marketing language and content

- ☐ **Language does not attempt** to attract, urge, pressure, or otherwise entice or compel a member to enroll in a specific CCO or CCO product.

Examples of CCO marketing communications that are **NOT permitted** include:

- ∅ “CCO X is the best choice for OHP members.”
- ∅ “CCO Y members have better health outcomes.”

- ☐ **Creates name recognition for CCO by a permissible method**, per [OAR 410-141-3575 \(3\)](#).

Permissible methods for creating name recognition include, but are not limited to, brochures, pamphlets, newsletters, posters, fliers, websites, bus wraps, billboards, web banners, health fairs, or health-related events.

- *Subcontractors:* Creates name recognition by a permissible method and/or expresses participation in or support for a CCO. Examples of subcontractor marketing communications that **ARE permitted** include:
 - ✓ “Provider X is contracted with CCO Y.”
 - ✓ “CCO Y members may choose Provider X as their Primary Care Provider.”
 - ✓ “Provider X looks forward to serving CCO Y members”

Language access and readability

- ☐ **Readability** is Grade 6 on the Flesch-Kincaid Grade Level scale (Maximum score: 6.9)
- ☐ Document includes **Language Access Statements** in the state's top 15 prevalent languages, plus English, per [45 CFR § 92.11](#).
 - If document type is not listed in [45 CFR § 92.11 \(5\)](#), it only needs statements in the CCO service area’s prevalent languages, plus English.

☐ [Per 42 CFR 438.10](#), all **Language Access Statements** must include:

- Help is free
- Other languages and formats are available
- Interpreters are available
- Customer service number
- TTY number
- 18 pt font size

☐ All **font sizes** are at least 12 point for regular text, 18 point for large text. This applies to all text, including graphics, headers, and footers.

☐ **Font color** has a contrast ratio of at least 4.5:1 for normal text and 3:1 for large text. You can check contrast ratio of font colors on [WebAIM](#).

☐ All **URLs are correct** and **hyperlinks are working**. If the document will be printed, URLs are spelled out.