Submission Guide for Medicaid Member Materials using the CCO Deliverables Portal

Oregon Health Authority

Introduction

Please use this guidance for Medicaid member materials created by coordinated care organizations (CCOs). CCOs must submit member notices, informational and educational materials, and marketing materials to OHA for review and approval by the CCO Quality Assurance unit prior to use and distribution to members.

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Review timeframes

CCOs can expect the following review timeframes:

- Regular submissions: Up to 45 days
- Expedited submissions: Up to 15 days
- Emergency submissions: Up to 4 days

Subcontractor materials

- CCOs are responsible for reviewing and approving subcontractor versions of materials to ensure all requirements are met.
  - Example: Dental plan newsletter
- CCOs should not submit subcontractor materials to OHA unless specifically requested.
- Subcontractor materials must be co-branded with the CCO.

Resubmissions

No resubmission needed

- Approved within the last 12 months, or
- Contact information or date changes; minor formatting changes.

Resubmission needed

- Approved more than 12 months ago, or
- Changes to messaging.

Last Updated: August 2024. Please visit the Member Material Submission page for more information, including resources and Frequently Asked Questions (FAQ). If you have a question that is not listed in the FAQ, please contact CCOEngagementTeam@oha.oregon.gov.

What should be submitted to OHA for review and approval

No submission to OHA needed	
The following materials do not need to be submitted to OHA for review.	
• Internal operations documents, such as talking points or process steps, unless specified in Contract. • General reference documents that the CCO (or its subcontractor) did not create, like a CMS guide to Medicare or pamphlet from the American Heart Association. • Other general documents or general messaging not explicitly intended for an Oregon Health Plan (OHP) audience.	• Newsletters, news articles, and blog posts unrelated to OHP benefits or changes, such as wellness tips. • Social media messaging and graphics that are not marketing or advertisements. • Subcontractor materials, unless specifically requested by OHA. CCOs are responsible for reviewing versions of materials and ensuring all requirements are met. Example: Dental plan newsletter.

Attestation needed / File and use
The following materials need to be submitted as attestations. CCOs can use these materials as soon as they have been submitted. However, these materials are subject to audit.
• Newsletters, news articles, blog posts related to OHP benefits or changes. • Major changes to member portals or member landing pages. Please submit screenshots. • Public emergency documents, like wildfire health and safety information. • Materials that utilize CMS templates for Medicare-Medicaid Duals. Please note: Language Access information must be added to the document before you submit.

Submission needed / Approval required	
The following materials must be submitted to OHA for review and approval.	
• Mass text messages and emails • Robocall scripts • Video scripts • Letters to members • Member postcards, self-mailers, handouts, and flyers • Member guides, handbooks	• Marketing or advertising intended for members/potential members, like bus wraps, billboards, graphics. • Community Advisory Council (CAC) application and recruitment flyer/email • Other materials intended for OHP members or potential members.

Please note: All member materials, regardless of submission status, must comply with OAR, ORS, CFR, and Contract requirements.

Checklist for OHP member materials

All materials should meet the following requirements:

☐ **Readability** is Grade 6 on the Flesch-Kincaid Grade Level scale (Maximum score: 6.9)

☐ Document includes **Language Access Statement** (also called taglines) in all prevalent languages. Example taglines can be found on the Member Material Submission page.

- Per Section 1557 of the Affordable Care Act, effective November 2, 2024, some member materials must include language access statements in Oregon's Top 15 prevalent non-English languages. For the list of these materials, please see 45 CFR § 92.11. For materials not on this list, language access statements must be in English and all prevalent non-English languages in the CCO service area.
- OHA uses the Monthly Medicaid Population Report to determine which languages fall into the Top 15 list.

☐ **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 your font colors on WebAIM.

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

☐ Document includes **CCO branding and contact information**. Subcontractor documents must be co-branded with the CCO.

☐ **Content** is accurate and reflects the most current information available.

Please note: Contract deliverables may have additional requirements, as outlined in guidance and evaluation criteria.

Relevant references and citations

Oregon Administrative Rules

- 410-141-3575 Marketing and Definitions
- 410-141-3580 Potential member information
- 410-141-3585 Education and information

CCO Contract

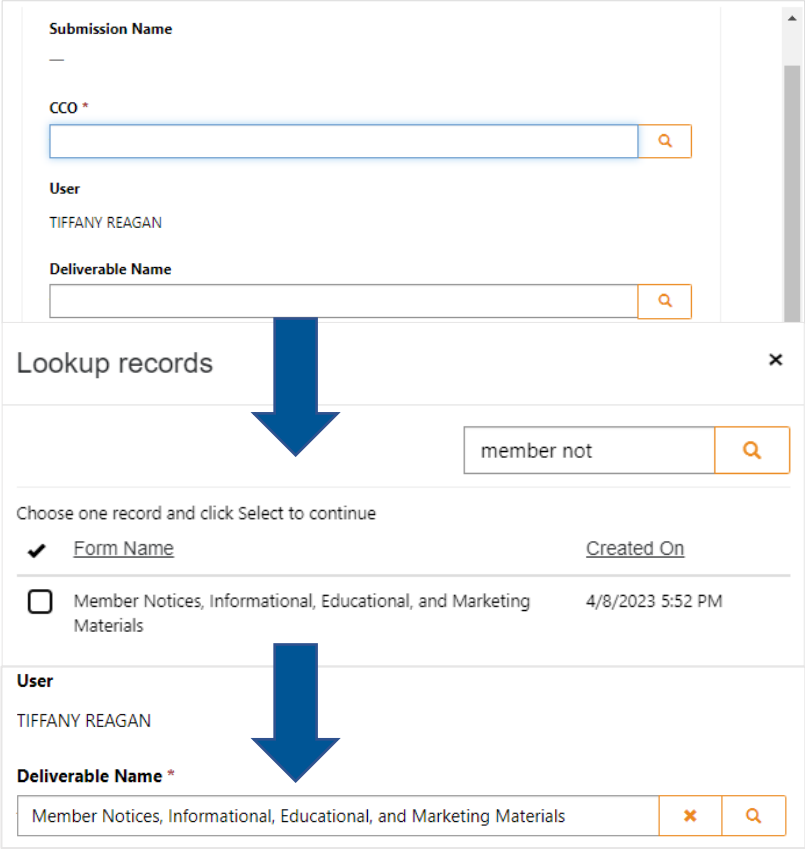
- Exhibit B, Part 3, Patient Rights and Responsibilities, Engagement, and Choice

Code of Federal Regulations

- 42 CFR § 438.10 Information Requirements

How to submit materials using the CCO Contract Deliverables Portal

1. Login at https://oha-cco.powerappsportals.us/
2. From your dashboard, click "Submit" to load the Create Submission screen.
3. Choose your CCO.
4. From the Deliverable Name list, choose "Member Notices, Informational, Educational, and Marketing Materials."
5. Choose the system due date. For ad hoc deliverables like member materials, it's always the last day of the year.
6. Let us know if the submission is an attestation / file & use.
7. Attach files. You can attach multiple files at a time. This is helpful when you have a group of related materials, such as several versions of a letter or a suite of marketing materials. Please do not submit unrelated materials together.



8. Add any applicable notes. Example: "Please expedite this review"
9. Click submit. An alert will then be sent to reviewers.

How to check the status of your submission

The status and date will populate on the submission details page. The CCO user who submitted the deliverable will receive a notification when the status changes.

STATUS	REVIEWERS USE WHEN
Submitted	*System default after submission*
Under Review	Review begins
Corrections Needed	Review is complete but changes are needed
Approved	Review is complete and deliverable is final / approved

How to indicate submission is an attestation or "File and Use"

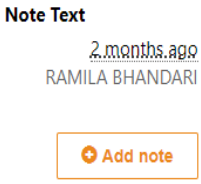
On the "Create Submission" screen, use the attestation dropdown to choose "Yes" or "No."

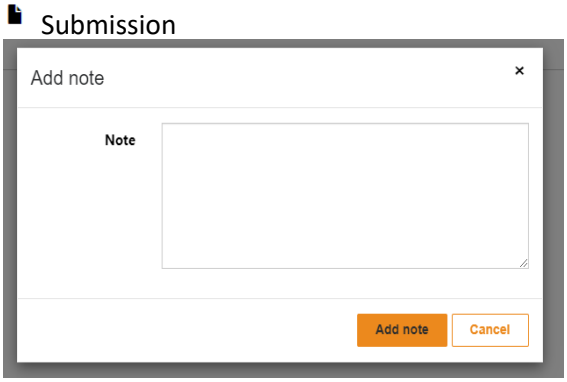
How to use notes to request expedited review or add more context

You can use the CCO Portal's notes functionality to communicate with reviewers.

Examples of use: Add a note to request an expedited review or alert reviewers to additional context about your submission.

You can add a note during submission. To add a note to an existing file, choose a submission from the dashboard and click "View details." On the submission page, click the orange + Add note button.

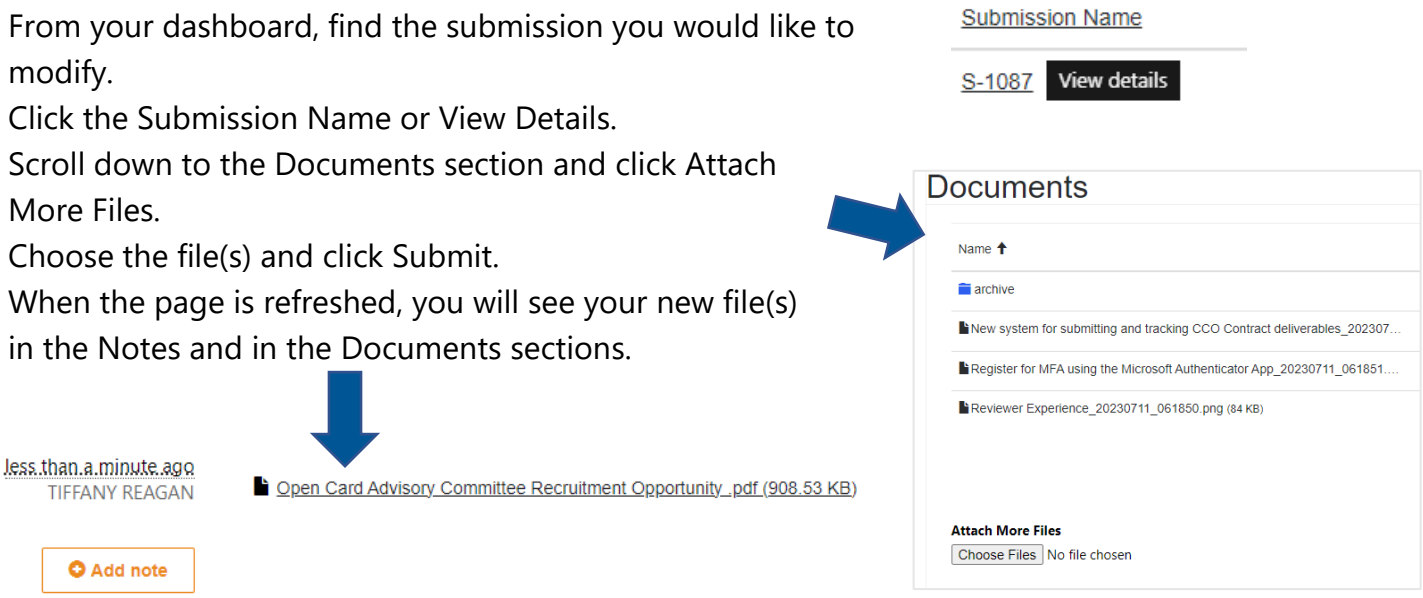




How to submit a corrected or updated version of the same document

Adding an updated or corrected document to an existing submission record is simple.

1. From your dashboard, find the submission you would like to modify.
2. Click the Submission Name or View Details.
3. Scroll down to the Documents section and click Attach More Files.
4. Choose the file(s) and click Submit.
5. When the page is refreshed, you will see your new file(s) in the Notes and in the Documents sections.



More training: You can find more training resources and information about the CCO Contract Deliverables Portal on the CCO Contract Forms page.