

Recommendation 3

Create Clear Correspondence to Drive Action

1. Clear and user-tested notices will drive action, reduce churn, and build trust

The Department of Human Services (DHS) must ensure its notices are clear, direct, and easy to read and understand by the populations that use Medicaid. New work requirements and more frequent renewals require participant action and effective notices will drive action. While we encourage and support DHS prioritizing automation, it is inevitable that many thousands of Pennsylvanians will need to take action to maintain coverage. Effective notices will prevent hours of unnecessary caseworker time, churn, phone calls and questions. Clear communication will build trust within the system, which is much needed at this moment. If participants understand what is being asked of them at the outset, they will be more likely to trust in government systems and believe they operate fairly. Improving notices are well worth the investment.

We strongly urge DHS to review and adopt recommendations from Civilla, a non-profit design firm with a proven track record of creating effective public benefits notices and achieving better engagement from participants. Specifically, page 5 of its [“Human-Centered Work Requirements for Medicaid”](#)¹ report contains a list of seven recommendations that DHS should seriously consider in designing new notices. At a minimum, DHS should:

Use plain language and simplified structure. Avoid words like “exemption” and “verification” and large blocks of text. Instead, opt for simplified language, short paragraphs, and bullets to make text easier for low-literacy populations to read.

Use large fonts or bold text to make the most important message stand out. Most often, this will be the action that you are requesting participants to take. In the case of notices about work requirements beginning, this means emphasizing that the notice is about the work requirement and the specific information about what the recipient needs to do to maintain Medicaid.

Highlight key information up front, such as the action needed to be taken and the deadline for that action. Ensure that information is specific and actionable. Avoid burying the lead.

Increase the response rate to notices by supplementing with other forms of communication.

For example, DHS could revisit its successful strategies from the unwinding, including texting participants when renewals are due or before notices arrive so that participants know to pay attention to the notice and take action. DHS should also partner with Medicaid Managed Care

¹ Available at <https://civilla.org/assets/files/Civilla-Human-Centered-Work-Requirements-Medicaid-Report.pdf>.

Organizations (MCOs) to outreach to participants when their renewal is coming due and advise on how to renew coverage.

Improving notices to effectively drive behavior is not an easy task. DHS has already engaged with numerous outside vendors throughout the HR1 process for tasks that require specific, technical expertise. Creating effective notice design also requires technical expertise and should be treated in the same way. We strongly urge DHS to engage with a vendor that has experience and proven success in writing and designing notices for public benefits programs, such as Civilla.

2. Design noncompliance and termination notices with information about how to meet requirements

Applicants and recipients must be notified of how they can meet work requirements. Even with a large-scale outreach and education campaign, some recipients will not learn about these new requirements until their benefits are threatened. As such, any noncompliance, termination, or rejection notice where the adverse action is due to failure to meet an exemption from or verify compliance with work requirements should include information about how to show an exemption or compliance. Further, it should include language noting that, should an applicant become compliant or exempt in the future, they may reapply for Medicaid and may be found eligible. This language will be particularly important for people who are transitioning between jobs and may become compliant in the near future.

3. Design immigration status termination notices with clear information about new immigrant eligibility rules that has been professionally translated and community reviewed

Immigration status eligibility rules have always been very confusing and people will be even more confused when these rules change in October. Notices of Medicaid termination issued to non-pregnant adults whose immigration status make them ineligible should clearly and concisely state the three immigration statuses that do make people eligible-- lawful permanent residency (green cards), Cuban and Haitian entrants, and Compact of Free Association Migrants. Notices should also state that people who have one of these statuses should report that to the CAO and ask for Medicaid to be turned back on.

Translations of these notices, like all translations, should be done by professional translators and then reviewed by community members. Advocates frequently encounter DHS translated documents (usually in languages other than Spanish) that include inaccurate or confusing language that render the translation incomprehensible to the recipient of the notice. Adding community review of translations will help catch these errors, reduce confusion, and make translations usable by LEP individuals.

4. Capitalize on this opportunity to also overhaul existing notices and improve systems to make notices more easily adaptable moving forward

For the same reasons that DHS should invest in creating clear and effective notices for HR1 implementation, it should take this opportunity to review and improve its current notices. Current notices are often confusing for participants. They are organized in a way that makes it difficult for participants to understand the reason for the decision and the action needed to resolve the issue, and may not contain a reason at all or list an incorrect one. Current notices of termination, for example, contain a brief explanation of the reason for the decision in the first box of the notice that is usually general and sometimes inaccurate. There is usually a longer explanation further down, but it is not laid out in a way that is easy to read or digest, and this section often contains unnecessary or unimportant information, and is also sometimes incorrect. The order that information is provided in the larger explanation is sometimes random and does not contain the most relevant information first. These explanations are often not written using plain language. Deadlines are not easily discernable or highlighted. HR1 provides an opportunity to improve DHS notices, making them more effective across the board. We urge DHS to use the strategies listed above to do so.

Further, DHS should prioritize updating its system so that notices are more adaptable in the future and give DHS the ability to edit or change both static language on notices and language that is populated on notices without going through a vendor. When community stakeholders have requested changes or updates to DHS notices in the past, they have been told that changes are difficult and slow to make. While DHS is working with Deloitte and other vendors to make system changes for HR1 implementation, DHS should prioritize making it easier to change notices moving forward. Making the system nimble and adaptable is critical to successful HR1 implementation. Without an adaptable notice system, there is no way to learn and course correct as implementation moves forward.