

Name	Member Communications
Date of Origin	2/15/2020
Current Effective Date	1/17/2025
Scheduled Review Date	1/17/2026

1. Policy

Capitol Dental Care (CDC) understands the vital role of member communications in assisting members to navigate the healthcare system. Additionally, CDC understands that member communications must conform to certain federal and state requirements. This policy exists to ensure that those standards are understood and met in CDC's course of business activities.

Some common member communications might include a Members CCO Handbook, CCO co-branded notices in the grievance and appeal system, notices about service requests, notices about provider terminations, and the provider directory.

CDC's member materials shall conform to the following standards as a matter of policy:

- Be written in easily understood language and format.
- Be written in at least 12 point font size.
- Have taglines in large font (18 point) informing individuals how to request auxiliary aids and services, including the provision of materials in alternative formats.
- Have taglines in prevalent non-English languages describing how to request auxiliary aids and services, including written translation or oral interpretation, the toll-free and TTY/TDY customer service number, and availability of materials in alternative formats.

CDC strives to have culturally and linguistically appropriate mechanisms in place to help members and potential members understand the requirements and benefits of CDC's services. In doing so, as a matter of policy, CDC:

- Accommodates requests made by sources other than members and potential members, such as family members or caregivers;
- Notifies members and potential members that auxiliary aids and services are available free of charge;
- Notifies members that alternative formats for written material are available free of charge; and

- Takes into consideration the special needs of members or potential members with disabilities or limited English proficiency.

2. Procedure

Acceptable Methods of Communication – CDC may provide information to members by the following methods:

- Mailing a printed copy of the information to the member's address,
- Emailing the information to the member's email address after first obtaining the member's agreement to receive communications by email,
- Posting the information on its website and advising the member in paper or electronic form that the information is available on the Internet and includes the applicable Internet address, provided that members with disabilities who cannot access this information online are provided auxiliary aids and services upon request at no cost; or
- Providing the information by any other method that can reasonably be expected to result in the member receiving that information

Electronic Communications – CDC will only communicate with a member electronically if:

- The format is readily accessible;
- The member has requested or approved electronic transmittal;
- The information can be electronically retained and printed;
- The member is informed that the information is available in paper form without charge upon request and is provided within 5 business days;
- The information does not constitute direct member notice related to an adverse action or any portion of the grievance, appeals, contested case hearings or any other member rights or member protection process; and
- The information is consistent with the content and language requirements of 42 CFR §438.10.

Member Requests – If a member requests information about the following, CDC will provide such information within 5 business days of the request:

- Whether CDC uses provider contracts including alternative payment methodologies or incentive plans and
- The structure and operations of CDC

Provider Termination – In cases where a provider's participation is terminated with CDC, CDC will make a good faith effort to give written notice of the

termination to members within 15 calendar days after receipt or issuance of the termination notice. The members that should receive such notice are those that received their primary care from or were seen on a regular basis by the terminated provider.

Electronic Materials – CDC makes electronic versions of many of its materials available on its website, including its provider directory, along with access to their CCO member handbook in a form that can be electronically retained and printed, available in a machine-readable file and format.

Educational Materials – CDC develops and provides educational programs including the promotion and maintenance of optimal oral health, which include information regarding the risks of tobacco use and referral for tobacco cessation intervention.

Approval of Materials - All correspondence, regulatory letters (NOABD, Grievance, Appeal), educational materials being sent to the member directly by CDC must be approved by the Coordinated Care Organization (CCO) prior to being sent to the member.

Implementation of Regulatory Letter Templates:

- CDC will receive from the CCO updates to regulatory letter templates approved by OHA.
- CDC Compliance Department is responsible for implementation of updated templates by requested implementation date.
- Upon completion of template implementation, signed attestations are provided to CCO as requested.

Monitoring and Compliance: The Compliance Department will audit enrollee correspondence and educational materials for non-compliance.

3. Revision Activity

Modification Date	Change or Revision	Effective Date
1/5/2021	Review	1/5/2021
2/16/2022	Review	2/16/2022
05/03/2023	Revision	05/03/2023
6/19/2024	Review only.	6/19/2024
1/17/2025	Revision	1/17/2025

4. Affected Departments

- All CDC Administrative Staff

5. References

- 42 CFR § 438.10
- OAR 410-141-3585
- CDC-OHA Contract Exhibit B Part 3