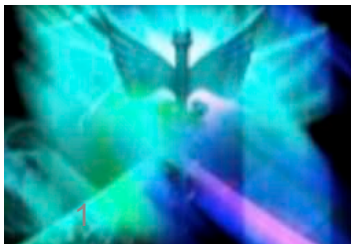




Using Plain Writing at CMS

Meeting the Requirements of
the Plain Writing Act of 2010



The Plain Writing Act of 2010

All Federal agencies must use plain writing in any document that:

- Is necessary to get a Federal benefit or service
- Gives information about a Federal benefit or service
- Explains how to comply with Federal requirements

This means we ***must*** use plain writing principles in everything we write.

What is plain writing?

Your document is in plain writing if your readers can:

- Find the information they need
- Understand the information
- Use the information to meet their needs

Plain writing is communication your readers can understand the first time they read or hear it.

How to use plain writing

The letter on the next slide can be improved using plain writing principles. The document:

- Is text heavy
- Uses long sentences
- Quotes regulations
- Has no white space

Example: ORIGINAL VERSION

Text
Heavy

Dear Mrs. Jones,

No
Headings

Your son has written the Centers for Medicare & Medicaid Services on your behalf, asking if Medicare would reimburse you if you purchased lifts for your shoes. However, for any item to be covered by Medicare, it must:

- be eligible for a defined Medicare benefit category;
- be reasonable and necessary for the diagnosis or treatment of illness or injury or to improve the functioning of a malformed body member; and
- meet all other applicable Medicare statutory and regulatory requirements.

Therefore, for Medicare to cover lifts in your shoes, your doctor must sign and date an order (if applicable) stating that you need lifts in your shoes because of your medical condition. The order or "Certificate of Medical Necessity" (and prescription) must be taken to a supplier before a claim is submitted to the durable medical equipment regional carrier. If the supplier bills for an item, such as lifts for shoes, without first receiving the completed order, the item or lifts for shoes will be denied as not medically necessary.

Shoes, inserts and modifications are covered in limited circumstances. They are covered in selected patients with diabetes for the prevention or treatment of diabetic foot ulcers. Additionally, inserts and other shoe modifications are covered if they are on a shoe that is an integral part of a covered brace and if they are medically necessary for the proper functioning of the brace.

Long
Sentences

Example: PLAIN WRITING VERSION

Dear Mrs. Jones,

Your son wrote to us to ask if Medicare would pay you back if you purchased lifts for your shoes. Medicare helps pay for shoes, inserts and modifications in these limited circumstances:

- If a person with diabetes needs them to prevent or treat diabetic foot ulcers
- If they're on a shoe that's part of a covered brace and are medically necessary for the brace to function

Headings

Space

Here's What to Do Next

For Medicare to cover lifts in your shoes, your doctor must sign and date an order (called a "Certificate of Medical Necessity") stating you need lifts in your shoes because of your medical condition. You also need a prescription for the lifts.

Take the Certificate of Medical Necessity and prescription to a supplier who will order the lifts. The supplier must have a completed order before they bill Medicare. If the supplier bills Medicare for the lifts without a completed order, the lifts will be denied as not medically necessary.

Short Paragraphs

Plain writing helps you & your readers

Plain writing:

- Saves you and your readers time
- Makes your writing and your ideas more powerful
- Helps you get better response
- Helps you give better customer service

Plain writing helps CMS

- People comply with our regulations more often
- Enforcement efforts are more effective
- People make fewer errors on forms and applications
- Lawsuits are less likely

Evidence that plain writing works

- The Dept. of Veterans Affairs (VA) used plain writing principles to revise a letter to veterans asking for updated beneficiary information.
- Plain writing increased the response rate, saving the VA an estimated **\$8 million** every mailing cycle.

| Response Rate | |
|----------------------|-----|
| Original letter | 35% |
| Plain writing letter | 58% |

Example: VA beneficiary letter

ORIGINAL VERSION

The proceeds of your life insurance policy will be paid to your last named beneficiary of record with the Department of Veterans Affairs according to the payment option selected by you. Our experience shows that many insured fail to keep their designations up-to-date when there are changes in their personal circumstances. Therefore, if you desire, but have not selected the lump sum settlement option or cannot remember the option you selected, or believe your beneficiary designation is not otherwise current, we suggest you complete the enclosed form and return it to us.

PLAIN WRITING VERSION

We're updating our computer systems for 2012 to improve the way we store our records and process our claims. This is a perfect opportunity for you to update your records as well.

This letter explains what we did to update our records and what you can do to update yours...

7 plain writing basics

1. Organize for your readers
2. Use “you” and other pronouns
3. Use active voice
4. Write short sentences
5. Use common, everyday words
6. Design for easy reading
7. Check your work

1. Organize for your readers

- Get to know your readers
- Organize your information the way your readers need or expect it
- Put the most important points first
- State the action you want
- Start with the issue, not the background
- Anticipate questions

EXAMPLE: Email announcement

See the attached flyer about upcoming training for Contracting Officers' Technical Representative (COTR) and Government Task Leaders. This training is presented by the Office of Acquisition & Grants Management (OAGM). It will take place from 1pm to 3pm on Wednesday, March 2, 2010. This is the second OAGM Contracting Officers' Technical Representative (COTR) Seminar II in FY 2011 training. Be sure that you sign-in on the date of the training to ensure you receive two hours of continuous learning points (CLPs).

Text
Heavy

No
Sections

The title of the course is: CMS OAGM COTR Seminar II FY 2011-Contract Funding. You must have prior supervisory approval to attend. You will be able to print your certificates from the HHSU once the training is completed in a timely fashion.

Seems out
of order

Example: Plain writing announcement

The Office of Acquisitions & Grants Management (OAGM) presents:

COTR Seminar II FY 2011- Contract Funding

A seminar for Contracting Officers' Technical Representatives
(COTR) & Government Task Leaders

Wednesday, March 2, 2011

1 - 3 p.m.

CMS Auditorium

See the attached flyer for more information.

Headings

Short
Sentences

Space

2. Use “you” and other pronouns

Pronouns, such as “you” and “we,” pull readers into a document and make it relevant to them.

In general:

- Refer to the reader as “you” in the text and “I” in questions
- Refer to your organization as “we” and “us” (when appropriate)
- If necessary, define “we” and “you” in the definitions section or in the text

Example: Using pronouns

ORIGINAL VERSION

If applicant purports to represent an organization, a letter or other documentation that the applicant has authority to represent that organization is required to be submitted with this form.

PLAIN WRITING VERSION

You must include a letter or other document from your organization that says you are allowed to represent your organization.

3. Use active voice

Active Voice:

- Makes clear who does what
- Is more direct
- Reduces the number of words

Example: Your provider sent us the claim.

Passive Voice:

- Is usually longer and more awkward
- Makes your reader work harder to translate your document

Example: The claim was sent to us by your provider.

4. Write short sentences

Writing complex sentences reflects our background and education. But we're not writing for ourselves - we're writing for our readers.

- Research shows people don't read – they scan.
- Limit each sentence to one subject.
- Use the fewest words possible, but remember: your writing should be clear...not just brief.
- If a sentence goes over two lines on a standard page, it's probably too long.

EXAMPLE: Original version

Long
Sentence

The purpose of the PHS Commissioned Corps is to provide highly-trained and mobile health professionals, who carry out programs to promote the health of the Nation, understand and prevent disease and injury, ensure safe and effective drugs and medical devices, deliver health services to Federal beneficiaries, and furnish health expertise in time of war or other national or international emergencies. Their mission is "Protecting, Promoting, and Advancing the health and safety of the Nation."

EXAMPLE: Plain writing version

Shorter Sentence

The PHS Commissioned Corps provides mobile health professionals who give medical expertise during war or other emergencies. Our mission is “protecting, promoting, and advancing the health and safety of the nation.”

5. Use common, everyday words

Using common, everyday words makes people feel like we're helpful partners in navigating a complex health insurance system.

Avoid:

- Undefined abbreviations
- Undefined acronyms
- Using different terms to mean the same thing (such as doctor, physician, provider)
- Legal or technical jargon
- Quoting regulations unless absolutely necessary

6. Design for easy reading

Nobody likes to look at a “wall of text.” Help readers find what they need with these 4 quick & easy design features:

- Use short sections and paragraphs
- Include useful headings
- Use vertical lists and tables
- Add white space between paragraphs

EXAMPLE: Email announcement

We are sending to you a 'Save-the-Date' notice of our upcoming National Medicare Education Program meeting. Please note that this meeting will feature a special session focused on the new CHIPRA grants recently awarded by CMS. We are planning a very exciting panel discussion about how CHIP funds will be utilized by national partners at the local level to increase enrollment. In addition, this meeting will also include information about marketing surveillance by CMS and a special listening session with the Medicare Ombudsman to address open enrollment or other systemic concerns. We will also have experts from our Office of Beneficiary Information Services walk you through recent changes to the Medicare.gov website.

Text
Heavy

The National Medicare Education Program Partnership Alliance began as an educational effort as a result of the Balanced Budget Act of 1997, which expanded Medicare's health plan options by creating the Medicare+Choice program. A partnership soon developed between public and private organizations and CMS around a common goal: educating people with Medicare to make informed choices about their health care. NMEP continues its work under the Medicare Modernization Act of 2003. CMS traditionally holds this meeting in Washington, D.C., with National Partner Organizations. In addition to the National Partner Organizations, local partners from each CMS Regional Office will be invited to participate in this meeting virtually via teleconference. This meeting will set the standard in bringing together our national and regional partners for a dialogue that is helpful and productive for all. The meeting agenda will be posted as soon as it becomes available.

Long
Paragraphs

We hope you will be able to join us!

EXAMPLE: Plain writing announcement

Save the Date!

NMEP Meeting December 2, 2010

Featuring a special session on recent CHIPRA grants

Other items on the agenda:

- Exciting panel discussion about how partners plan to use CHIP funds to increase enrollment
- New information about CMS marketing surveillance
- A special listening session with the Medicare Ombudsman
- An expert demonstration of recent changes to the Medicare.gov website

Register now!

The National Medicare Education Program (NMEP) Partnership meetings bring our national and regional partners together for a dialogue that's helpful and productive for all.

We hope you'll join us!



White
Space



Short
Sections



Vertical
Lists

7. Check your work

- Read it out loud to yourself.
- Ask someone else to read it out loud to you.
- If possible, ask someone from outside your component or someone from your target audience to read your document.
- If your document is going to a certain target audience, consider having CMS researchers test it more formally.

Plain writing = CMS Tone of Voice

- Language can change to reflect audience-appropriate content, but communications from CMS should always *sound* the same.
- Users should have the same CMS experience whether they visit us online, call 1-800-MEDICARE, get a notice in the mail, or read a CMS publication.
- People want CMS to be fair, accurate, friendly, helpful, and sympathetic.

CMS tonal values

- **Trustworthy, authoritative, unbiased**
 - CMS is simple, declarative, comprehensive and factual. Never overly formal, academic, or unnecessarily complex.
- **Compassionate, reassuring, protective**
 - CMS is positive and upbeat, with a focus on gaining benefits, health, quality, and support – we're here to help.
- **Stable**
 - CMS is calm, patient, solid and mature. We're never overly excited, boastful, jokey or trendy.
- **Helpful, genuine, sincere, human**
 - CMS is conversational and natural, engaged in what our users are thinking and experiencing. We're not an impersonal "faceless bureaucrat."

EXAMPLE: CMS Tone of Voice

POOR:

Here at the Centers for Medicare and Medicaid Services (CMS), we are working hard each and every day to ensure that Medicare stays strong, and that people with Medicare have access to quality, affordable care. All seniors and people with disabilities in the program should look at their current coverage, compare it to the options available, and decide which coverage best meets their needs during this Open Enrollment period.

WHY IT'S BAD:

Focus is on CMS; doesn't speak directly to readers; terminology too bureaucratic; no personal pronouns; not conversational.

BETTER:

During Open Enrollment, look at your current coverage, compare it to the options available, and decide which coverage meets your needs.

The writing reality

Very little content goes forward at CMS without many reviews. Some strategies for surviving clearance:

- Get a clear assignment up front.
- Ask your manager these questions:
 - Who are the readers?
 - What's the purpose?
(To persuade? Instruct? Inform?)
 - What's the subject? (Rule out all other subjects)
 - What's the most important point? (The message)

Get more plain writing information

- Visit the CMS Communications Portal for more plain language and writing resources
cmsnet.cms.hhs.gov/commport.htm
- Visit the Plain Language Action & Information Network
www.plainlanguage.gov
- View the Final Guidance on Implementing the Plain Writing Act of 2010 from OMB
www.whitehouse.gov/sites/default/files/omb/memoranda/2011/m11-15.pdf
- View how CMS is implementing the Act
www.medicare.gov/plainlanguage.aspx

Office of Communications Contacts

Plain writing review requests:

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- Amy Miner: amy.miner@cms.hhs.gov x65242

Research requests:

- Division of Research
- Dr. Frank Funderburk: frank.funderburk@cms.hhs.gov x61820