**Review of Marketing and Communication Materials, Health Literacy and Cultural Appropriate Communication**

**Section:** Company and Employee Standards

**Compliance:** URAC Specialty Pharmacy 2.1

**URAC Standards:** PHARM Core 10, 27 CSCD 4, 10, 12

**ACHC Standard:**DRX2-1A

**Policy ID:** 1.14

**Approved by:**

**POLICY**

<insert practice name> has established a process to review all marketing (written and Internet site) and communication materials to ensure that services represented in these materials are accurate and clearly communicated. This process includes appropriate inter-departmental review and approval and prompt corrective action when problems are detected.

<insert practice name> recognizes that its patient population is very diverse with differing cultural backgrounds, physical needs, literacy levels and languages spoken which may impact communication with the patients/caregivers. Through health literacy and culturally appropriate communications, will ensure appropriate access and understanding for the population served, will empower consumers and ensure safety. <insert practice name> will ensure all patients are treated with respect and in a manner that meets their individual needs. <insert practice name> will make any necessary accommodations in order to effectively communicate with its consumers.

**PROCEDURE**

**I Ensuring Clarity and Accuracy of Marketing Materials**

<insert practice name> safeguards against misrepresentation in its marketing materials through its review and approval process. This process ensures that all communication information about its services is clear and accurate and includes activities the organization delegates, if any. **[PHARM Core 10 (a)] [CSCD 4 (a)]** Prior to final approval and use of marketing materials, the Quality Management Committee (QMC), consisting of department leadership, reviews all service related materials for accuracy of information. **[CSCD 4 (b)]** The department leaders are responsible for ensuring subject matter expert review of any materials that represent services provided by their department. **[PHARM Core 10 (b)]** This review and approval process is documented in the Marketing Materials Log with the date of review and approval, and the review by content experts.

<insert practice name> markets directly to patients who are seen at <insert practice name> clinics. <insert practice name> provides information to patients in multiple formats and media (e.g. Internet, print, live oral presentation, audio, video, e-mail, telephonic and/or interactive) so that all patients will have access to the relevant information. **[CSCD 10]** If <insert practice name> provides any communication regarding its programs or services to patients, <insert practice name> seeks to ensure those materials adhere to the Federal Plain Language Guidelines [www.plainlanguage.gov](http://www.plainlanguage.gov) to enhance comprehension. The Pharmacy Manager is responsible for developing and reviewing materials for adherence to People First Language and Plain Language guidelines. **[CSCD 12(a)]** <insert practice name> provides relevant information and guidance on plain language to staff that write or review consumer marketing materials to ensure they produce materials that are clear and easily understood by the intended audience**. [CSCD 12 (c)]**

<insert practice name> also ensures that all patient print communication materials are written at reading levels appropriate to the intended audience. The general target ranges are 5th to 8th grade reading levels for consumers, up to 12th grade reading levels for general public, and college level for communication regarding provider, clinical and contractual issues. The Reading Ease tool is used as a guide to help determine reading ease <https://readability-score.com/>. **[CSCD 12 (b)] [CSCD 12 (a)]**

# Monitoring and Modifications of Marketing Materials

The Marketing Materials Log of all materials is maintained by the Pharmacy Manager. All Marketing materials (written and Internet website) are tracked through this log to monitor and ensure that all materials are maintained and remain accurate. All Marketing materials are reviewed at least annually through the process described above. The date of annual review and any revisions made are documented and maintained in the Marketing Materials Log. **[PHARM Core 10 (c)]**

If a discrepancy is noted in any Marketing material, the Pharmacy Manager is notified and develops a plan to resolve the discrepancy as soon as possible. If the discrepancy is misleading to the point of creating confusion and inconvenience for patients, the material is recalled to the extent possible. Prompt corrective action is taken to resolve the issue and resume the use of accurate Marketing materials. **[PHARM Core 10 (d)]**

During the review/monitoring process which safeguards any communication with potential consumers and clients <insert practice name> ensures that <insert practice name> does not misrepresent its products and services **[CSCD 4 (a)]** and <insert practice name>’s ownership. **[CSCD 4 (b)]**

# Health Literacy and Cultural Appropriate Communication Requirements

Through continual monitoring, review and analysis of the contracted specific patient population, <insert practice name> will ensure that all communication (written and website) that is provided to patients will:

* + Conform to the literacy levels of the patient, as appropriate. The Flesch-Kincaid Reading Ease tool is used as a guide to help determine reading ease **[CSCD 12 (a)]**
  + Help consumers be aware of what effect a health care decision may have on their daily lives **[CSCD 12 (b)]** (e.g. information about any potential activity limitations, food/drug interactions, consequences with medication non-compliance)
  + Display information in a way that highlights information important to consumer. Examples of this maybe include the use of bold or large font, yellow highlighting on the prescription label, use of patient information sheets, colored stickers as well as other display methods to attract attention to important information. **[CSCD 12 (c)]**
  + Present and deliver in a way that is appropriate to the diversity of <insert practice name>’s enrollment
    - Literacy level **[CSCD 12 (d-i)]**
    - Language differences **[CSCD 12 (d-ii)]**
    - Cultural differences **[CSCD 12 (d-iii)]**
    - Cognitive and/or physical impairments **[CSCD 12 (d-iv)]**

A primary focus of <insert practice name>’s customer service, the staff are trained/informed on how to identify consumer specific needs and access the appropriate resources needed for the clear communication. **[PHARM Core 27(a)]**

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