Removal of the "Marketplace Outreach: Best Practices for Outreach to Latino Communities" PDF from CMS's Health Insurance Marketplace Website

Access Assessment Report
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This report is accompanied by a blog post, providing context for the changes detailed here.

Sunlight Foundation's Web Integrity Project

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See WIP's Report Production Protocol for details of our review process

Classification of Web content alterations and changes in access to Web resources:

Classification	Changed in this report?
1. Altering or removing text and non-text content	Yes
2. Altering or removing links	
3. Moving an entire webpage or collection of webpages or establishing redirects	
4. Altering or removing an entire pertinent section of a webpage or collection of webpages	
5. Removing an entire webpage or document	Yes
6. Overhauling or removing an entire website	
7. Altering or removing search engines and open data platforms	
8. Altering, removing, or deleting datasets	

The Sunlight Foundation's Web Integrity Project does not intend to assess any government agency's intentions in presenting the changes to webpages or other Web content that appear in this report.

Removal of the "Marketplace Outreach: Best Practices for Outreach to Latino Communities" PDF from CMS's Health Insurance Marketplace Website

Overview

In September 2018, a PDF titled "Marketplace Outreach: Best Practices for Outreach to Latino Communities" was removed from the Health Insurance Marketplace website, a subdomain of CMS.gov. Links and text corresponding to the PDF were also removed from the website's "Training for navigators, agents, brokers, and other assisters" and "Special populations" webpages. The removed PDF was a slide presentation prepared by the CMS Office of Communications with information about challenges to and strategies for enrolling members of Latino communities for health coverage. A PDF titled "September Marketplace Update for Assisters" from September 2017 still includes a link to the removed PDF, noting that the best practices "identified in the slide presentation" are examples of how to "model targeted outreach efforts" to other populations.

Background

Agency details: The Centers for Medicare & Medicaid Services (CMS) is an agency within the Department of Health and Human Services (HHS). It administers Medicare, a federal health insurance program, and works with state governments to administer Medicaid and the Children's Health Insurance Program. CMS's Health Insurance Marketplace website is "the official Marketplace information source for assisters and outreach partners" and has "information about assister programs and tools to help existing and new Health Insurance Marketplace consumers."

Communications about changes: The office has not proactively communicated about or explained the changes described within this report.

Known archives: A public Web archive for CMS's Health Insurance Marketplace website is collected by the Centers for Medicare and Medicaid Services (CMS) and can be found at https://wayback.archive-it.org/org-551/*/https://marketplace.cms.gov/.

CMS's Health Insurance Marketplace website does not appear to include a link to the archive. The archive is, however, accessible through CMS.gov. The footer and header of the CMS.gov website include links to archives of CMS.gov and its subdomains, including CMS's Health Insurance Marketplace website.

Description of Most Notable Changes

1. The "Marketplace Outreach: Best Practices for Outreach to Latino Communities" PDF at the URL https://marketplace.cms.gov/technical-assistance-resources/outreach-latino-communities.pdf (PDF 1) was removed from CMS's Health Insurance Marketplace website between

September 19, 2018 and September 25, 2018 (see snapshot of removed PDF from November 21, 2018).

    a. The PDF was a slide presentation with information about health insurance enrollment for and outreach to Latino communities.

2. A link to the removed "Marketplace Outreach: Best Practices for Outreach to Latino Communities" PDF was removed from the "Training for navigators, agents, brokers, and other assisters" page (Webpage 1) and "Special populations" page (Webpage 2).

3. A link to the removed "Marketplace Outreach: Best Practices for Outreach to Latino Communities" PDF is still present in the "September Marketplace Update for Assisters" PDF (see Additional Information).

Table of Contents

Report Section	Webpage/PDF Title	URL	Page Status
PDF 1	Marketplace Outreach: Best Practices for Outreach to Latino Communities	https://marketplace.cms.gov/technical-assistance-resources/outreach-latino-communities.pdf	Removed
Webpage 1	Training for navigators, agents, brokers, and other assisters	https://marketplace.cms.gov/technical-assistance-resources/training-materials/training.html	Live, Altered
Webpage 2	Special populations	https://marketplace.cms.gov/outreach-and-education/special-populations.html	Live, Altered
Additional Information	Examples of webpages and documents with links to PDF 1 or other information about outreach to Latino communities		

Detailed Description of Changes in Access

Note: Throughout the entire report, links to captures of pages from the Internet Archive's Wayback Machine's (IAWM) on specified dates are provided for reference. IAWM displays time in GMT, but WIP reports dates and times in EST/EDT.

PDF 1: Marketplace Outreach: Best Practices for Outreach to Latino Communities

- URL:
  https://marketplace.cms.gov/technical-assistance-resources/outreach-latino-communities.pdf
- PDF was removed between **September 19, 2018** and **September 25, 2018**, according to a combination of WIP's monitoring software and IAWM.
  - See IAWM snapshot of removed PDF from November 21, 2018
- A previous version of this PDF from September 19, 2018 is available in the Centers for Medicare & Medicaid Services archives.

PDF 1 Details:
1. PDF 1, "Marketplace Outreach: Best Practices for Outreach to Latino Communities," was removed between September 19, 2018 and September 25, 2018.
2. PDF 1's URL
   https://marketplace.cms.gov/technical-assistance-resources/outreach-latino-communities.pdf leads to a notice with the text "File not found." [sic]."
3. The Health Insurance Marketplace website's "Training for navigators, agents, brokers, and other assisters" page (Webpage 1) and the "Special populations" page (Webpage 2) previously linked to PDF 1.
   a. On each of these pages, the link text for the links corresponding to PDF 1 read, "Marketplace Outreach: Best Practices for Outreach to Latino Communities – August 2016 (slides)."
4. PDF 1 was a set of 18 presentation slides saved within a single PDF. Each slide had information about specific topics pertaining to outreach to and enrolling Latino communities in health insurance plans. The following includes each slide's title and a brief description of its content:
   a. "Marketplace Outreach: Best Practices for Outreach to Latino Communities" (cover slide - see Screenshot 1)
   b. "Possible Enrollment Challenges"
      i. Listed seven potential challenges to enrolling members of the Latino community.
   c. "Possible Technology Barriers"
      i. Listed five technological issues the Latino community may face when trying to enroll.

d. "Affordability"
    i. Suggested ways to raise awareness about affordability of coverage.
e. "Key Messages for Assisters"
    i. Listed six key messages assisters should convey to consumers.
f. "Enrollment and Outreach Best Practices"
    i. Listed five best practices for assisters.
g. "Adapt CuidadoDeSalud.gov Information"
    i. Suggested five strategies for utilizing information available on CuidadoDeSalud.gov.
h. "Reaching Young and Healthy Latinos"
    i. Suggested using testimonials as proven strategy for engagement.
i. "In-Person Assistance in Your Community"
    i. Provided information on how to set up in-person assistance.
j. "Leveraging Community Resources"
    i. Suggested five ways to utilize community resources for outreach.
k. "Elements of a Successful Event"
    i. Provided five elements for assisters to consider to create a successful outreach event.
l. "Events & Localized Help"
    i. Had two images, each an example of advertising for an enrollment event.
m. "Engaging Local Media"
    i. Suggested five ways to engage media in outreach.
n. "Advertising with Deadlines"
    i. Suggested using the deadlines for enrollment to improve advertising.
o. "Successful Assisters Best Practices"
    i. Listed three best practices on how to successfully enroll community members.
p. "Marketplace.CMS.gov"
    i. Had an image of the marketplace.cms.gov homepage.
q. "Order CMS Print Resources"
    i. Provided details on how to order CMS print resources.
r. "Stay Connected"
    i. Provided information on how to receive updates about health coverage through email and social media.

5. The "Key Messages for Assisters" slide included the following bullet points (Screenshot 2):

"If consumers don't have coverage they could have to make a shared responsibility payment.
    • *The fee in 2016 could be 2.5% of yearly household income or $695 per adult person for the year ($347.50 for each person under 18)"[1]*

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[1] **Note:** *Starting in 2019, the "Shared Responsibility Payment," sometimes known as the "individual mandate," will no longer apply. Individuals who don't have health insurance will not have to pay a fee.*

a. This is the only slide that mentioned information specific to the year in which the PDF was published.

Screenshot 1: The cover slide from the September 19, 2018 version of the "Marketplace Outreach: Best Practices for Outreach to Latino Communities" PDF. The snapshot was captured by the Internet Archive's Wayback Machine.

Screenshot 2: The "Key Messages for Assisters" slide from the September 19, 2018 version of the "Marketplace Outreach: Best Practices for Outreach to Latino Communities" PDF. The snapshot was captured by the Internet Archive's Wayback Machine.
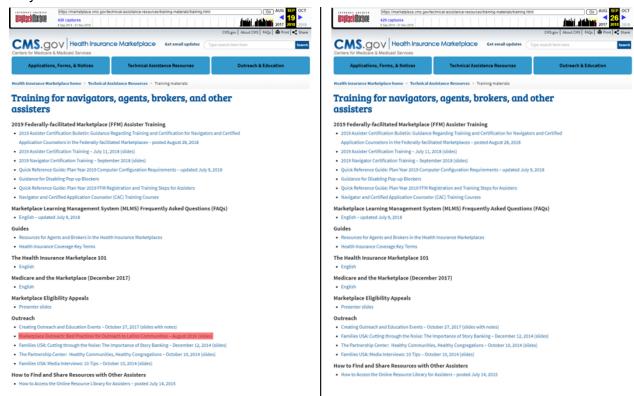
Webpage 1: Training for navigators, agents, brokers, and other assisters

- URL: https://marketplace.cms.gov/technical-assistance-resources/training-materials/training.html
- Changes occurred between **September 19, 2018** and **September 26, 2018**.
  Note: *Changes and removals of information that occurred outside the date range above are not detailed in this report.*
- A previous version of this page from September 19, 2018 is available in the Centers for Medicare & Medicaid Services archives.

Webpage 1 Details:

1. The link with the text "Marketplace Outreach: Best Practices for Outreach to Latino Communities – August 2016 (slides)" and the link URL https://marketplace.cms.gov/technical-assistance-resources/outreach-latino-communities.pdf was **removed** from Webpage 1 between September 19, 2018 and September 26, 2018 (Screenshot 3).
2. The removed link was listed under a section of the page titled "Outreach."
   a. The removed link previously led to the PDF titled "Marketplace Outreach: Best Practices for Outreach to Latino Communities" (PDF 1).

Screenshot 3: A side-by-side of Webpage 1, "Training for navigators, agents, brokers, and other assisters," on September 19, 2018 and September 26, 2018, showing the removed link (including text and link URL) highlighted in red. Snapshots captured by Internet Archive's Wayback Machine.

Webpage 2: Special populations

- URL: https://marketplace.cms.gov/outreach-and-education/special-populations.html
- Changes occurred between **September 19, 2018** and **September 28, 2018**, according to a combination of WIP's monitoring software and IAWM.
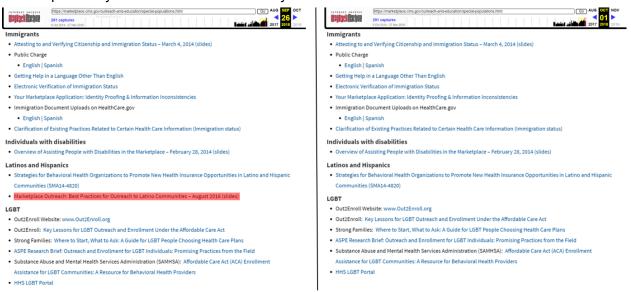 - See IAWM snapshot of altered webpage from October 1, 2018.
  Note: Changes and removals of information that occurred outside the date range above are not detailed in this report.
- A previous version of this page from September 19, 2018 is available in the Centers for Medicare & Medicaid Services archives.

Webpage 2 Details:

1. The following content was changed between September 19, 2018 and September 25, 2018 (nearest IAWM version from September 26, 2018) (Screenshot not shown):
   a. **Removed** the link URL https://marketplace.cms.gov/technical-assistance-resources/outreach-latino-communities.pdf from the "Marketplace Outreach: Best Practices for Outreach to Latino Communities – August 2016 (slides)" link.
2. The following content was changed between September 26, 2018 and September 28, 2018 (nearest IAWM version from October 1, 2018) (Screenshot 4):
   a. **Removed** the text "Marketplace Outreach: Best Practices for Outreach to Latino Communities – August 2016 (slides)."
3. The removed link and text were listed under a section of the page titled "Latinos and Hispanics."
   a. The removed link previously led to the PDF titled "Marketplace Outreach: Best Practices for Outreach to Latino Communities" (PDF 1).

Screenshot 4: A side-by-side of a portion of Webpage 2, "Special populations," on September 26, 2018 and October 1, 2018, showing the removed text highlighted in red. The snapshots were captured by the Internet Archive's Wayback Machine.

Additional Information: Examples of webpages and documents with links to PDF 1 or other information about outreach to Latino communities

Note: The webpages described below have not been comprehensively analyzed. Only the content on the current versions of pages has been assessed and has not been compared to the content on previous versions of the pages.

Webpages and documents that link to PDF 1, "Marketplace Outreach: Best Practices for Outreach to Latino Communities"
Note: The following list does not necessarily include all webpages and documents that currently link to or previously linked to PDF 1.

1. The "September Marketplace Update for Assisters" PDF with the URL https://marketplace.cms.gov/technical-assistance-resources/assister-newsletter-sept-2017.pdf on CMS's Health Insurance Marketplace website has a link to the removed "Marketplace Outreach: Best Practices for Outreach to Latino Communities" PDF (PDF 1).
   a. The "September Marketplace Update for Assisters" PDF, dated September 20, 2017, has a section called "Target Outreach," which includes the following text: *"Model targeted outreach efforts on best practices, such as those identified in the slide presentation: Marketplace Outreach: Best Practices for Outreach to Latino Communities."*

Webpages and documents with other information about outreach to Latino communities
Note: The following list does not necessarily include all webpages and other documents that have information about outreach to Latino communities. WIP has not comprehensively compared the content included in the webpages and documents described below to the content in PDF 1.

1. The "Special populations" page (Webpage 2) on CMS's Health Insurance Marketplace website has a link with the text "Strategies for Behavioral Health Organizations to Promote New Health Insurance Opportunities in Latino and Hispanic Communities (SMA14-4820)" and link URL https://store.samhsa.gov/product/Strategies-for-Behavioral-Health-Organizations-to-Promote-New-Health-Insurance-Opportunities-in-Latino-and-Hispanic-Communities/SMA14-4820.
   a. The link URL leads to the "Strategies for Behavioral Health Organizations to Promote New Health Insurance Opportunities in Latino and Hispanic Communities" page on the SAMHSA (Substance Abuse and Mental Health Services Administration) website.

     i. The SAMHSA page provides a link with the text "Promote New Health Insurance Opportunities in Latino and Hispanic Communities | pdf" and link URL https://store.samhsa.gov/file/23539/download?token=jUN9d5E-.

       1. The link URL leads to the "Strategies for Behavioral Health Organizations to Promote New Health Insurance Opportunities in Latino and Hispanic Communities" publication, a fact sheet first published in 2014, which "offers 10 outreach and enrollment strategies organizations can use to introduce Latino and Hispanic communities to the health insurance options under the Affordable Care Act."

2. The "Outreach and Enrollment Strategies in Latino Communities" page with the URL https://www.insurekidsnow.gov/webinars-videos/webinars/20150129/index.html on InsureKidsNow.gov has information about coverage disparities and outreach to Latino communities.

  a. This page contains a video for a January 29, 2015 webinar titled "Outreach and Enrollment Strategies in Latino Communities," as well as links to PDFs with the transcript and presentation slides for the webinar.

     i. Video hosted at the URL https://www.youtube.com/watch?v=lBNbzIj1UG4&feature=youtu.be

     ii. Transcript hosted at the URL https://www.insurekidsnow.gov/downloads/webinars-videos/webinar-transcripts/2015-01-29-webinartranscript.pdf

     iii. Presentation slides hosted at the URL https://www.insurekidsnow.gov/downloads/webinars-videos/webinar-slides/2015-01-29-webinarslides.pdf

3. The "Increasing Medicaid & CHIP Enrollment in Hispanic Communities" page with the URL https://www.insurekidsnow.gov/webinars-videos/webinars/20160914/index.html on InsureKidsNow.gov has information about increasing health coverage among Hispanic children.

  a. This page contains a video for a September 14, 2016 webinar titled "Increasing Medicaid & CHIP Enrollment in Hispanic Communities," as well as links to PDFs with the transcript and presentation slides for the webinar.

     i. Video hosted at the URL https://www.youtube.com/watch?v=JRtOJBy06xg

     ii. Transcript hosted at the URL https://www.insurekidsnow.gov/downloads/webinars-videos/webinar-transcripts/2016-09-14-webinartranscript.pdf

     iii. Presentation slides hosted at the URL https://www.insurekidsnow.gov/downloads/webinars-videos/webinar-slides/2016-09-14-webinarslides.pdf