



U.S. Health Insurers Struggle To Communicate With Their Audience

86.6% of Medicare documents not accessible to those 65 and over

CONTENTS

4	Executive Summary
6 - 7	Industry Context
9 - 13	Key Findings
15 - 16	Takeaways
18	Rankings
20 - 22	Methodology
24	About VisibleThread
26 - 27	Appendix & References

EXECUTIVE SUMMARY

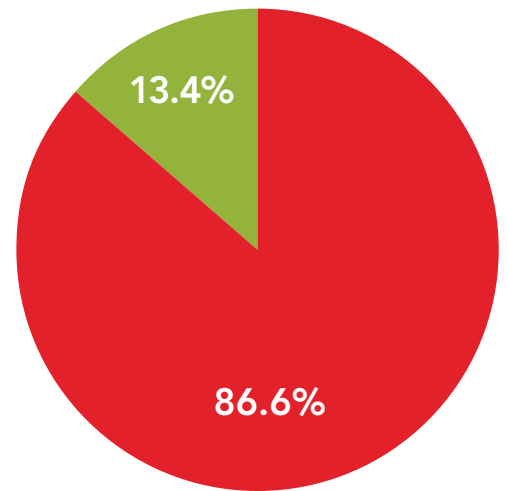
14.9% of the U.S. population is over 65¹ and can avail of Medicare. For health insurance companies this is an important audience to serve. So when it comes to Medicare, do the top insurers communicate clearly?

Trust in the health insurance industry is declining year on year. This is according to the Edelman Trust Barometer 2018. ² This loss of trust means consumers are less loyal. Acquiring new customers is becoming more difficult for organizations.

How can health insurers regain trust? Clear communication is a proven strategy. Communicating effectively to certain cohorts such as those 65 or over about their Medicare entitlements is critical.

Therefore, in Q4 of 2018, VisibleThread conducted research into Medicare information. We examined whether leading health insurers communicate clearly with their audience. Our results show that:

- 1 **86.6%** of insurers surveyed are not communicating effectively with those 65 or older.
- 2 Only **6** out of **30** insurers have an acceptable complex word density.
- 3 **56.6%** of insurance companies communicate in an academic tone with overuse of passive voice.
- 4 Long sentences are **2x** the recommended level.
- 5 **2/3** of insurers produce content more difficult to read than Moby Dick, and therefore inaccessible to a large proportion of the over 65s.



86.6% of the audience is not being communicated with

INDUSTRY CONTEXT

Government first required the health insurance industry to use plain language in 2013.⁸

Trust in U.S. health insurance declined in 2018 compared to 2017.² It now ranks among the least trusted in the world.² This is compounded by negative media coverage and general unease around affordable care in the U.S. The consumer is often in the dark. Who should they trust? How can they choose the right insurer for them? And will they be fully covered, with the right benefits?

Pre-Existing Conditions

Communications around pre-existing conditions often cause anxiety for elderly consumers trying to decide on the right health insurance coverage. Pre-existing conditions are health problems you had before your new health coverage starts. These include conditions like asthma, diabetes, or cancer.³ For insurers it may seem simple, however many consumers feel overwhelmed by complexity. Especially consumers over the age of 65 who rely on Medicare and need absolute clarity on coverage levels.

Plain Language - It's The Law

In October 2010, the Plain Writing Act of 2010 came into force. The law requires that federal agencies use clear language the public can understand.⁵ Plainlanguage.gov⁶ and Health.gov⁷ both share advice on how to communicate clearly in the health sector.

Government first required the health insurance industry to use plain language in 2013.⁸ Medicare commits to plain language as their specific reports show.⁹

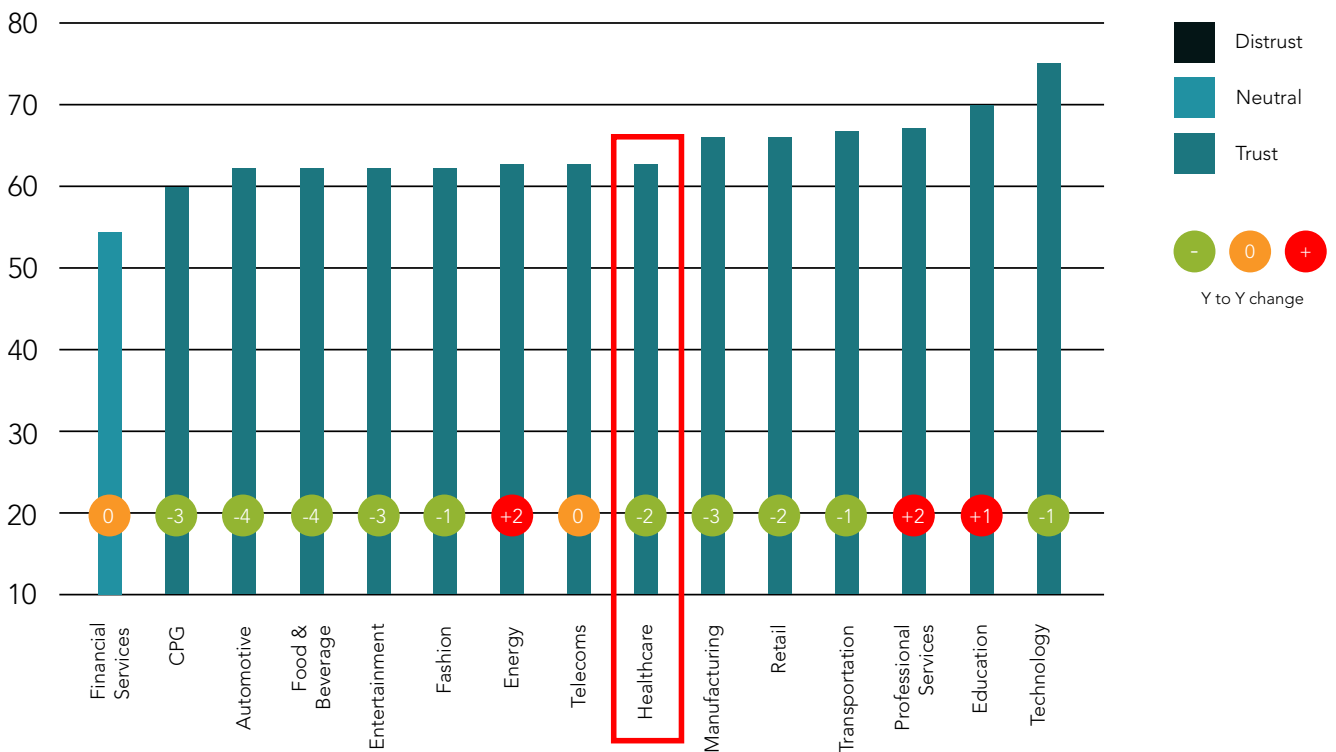
Regaining Trust

Mintel published their North America Consumer Trends 2018 report¹⁰ which shows that trust dictates where and how consumers spend. Health insurance companies who communicate clearly create a higher level of trust. Trusted brands attract new customers and maintain their existing base.

How Is It Accomplished?

Developments in the fields of AI (Artificial Intelligence) and NLP (Natural Language Processing) in the last 2 years make it now possible to measure and benchmark content clarity. VisibleThread provides this technology to visionary organizations who use it to analyze content at scale, across entire websites, and thousands of documents.

U.S. Health Insurers Among The Least Trusted In the World²



For this report, VisibleThread analyzed Medicare documentation from 30 of the leading U.S. health insurers. We analyzed 169,699 words using the VisibleThread platform. We present our findings in the next section.

KEY FINDINGS

Key Finding 1

86.6% of insurers surveyed are not communicating with their target audience

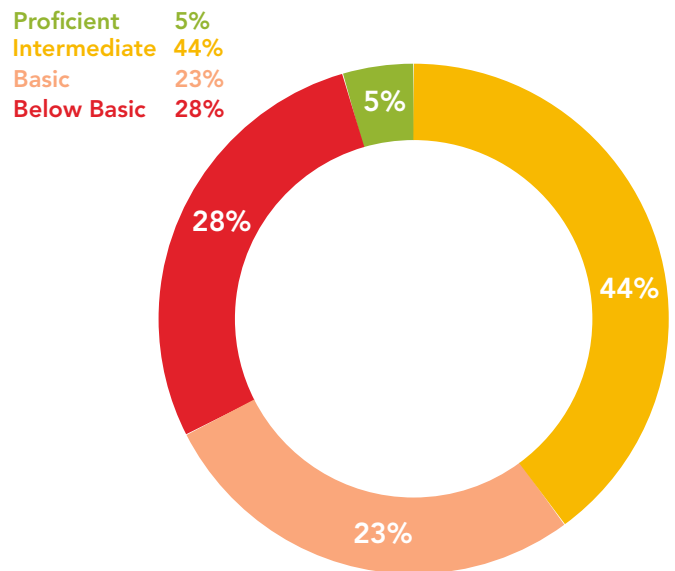
Medicare serves U.S. citizens who are 65 years old or over. You may be surprised to learn that 1/3 of the U.S. population that cannot read are in this age bracket. This means 10.6 million people over the age of 65 are unable to read.¹¹ The National Center for Education Statistics measured health literacy in 2003. Health literacy is the ability to obtain, process, and understand basic health information and services to make appropriate health decisions. The results for the 65-75 year age bracket were (see chart below):

This means that 51% of adults in this age bracket are at the basic or below basic level. They are unable to read instructions on a prescription label and determine what time a person can take medication.¹²

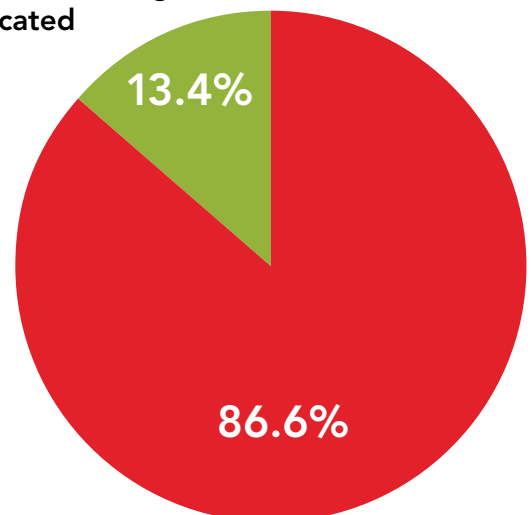
VisibleThread measured the education grade level it would take to understand content.

Our analysis showed an average grade level of 7.45. Insurers must write at a lower grade level, ideally below 6. This helps their entire audience understand Medicare information.

86.6% of the insurers scored between a 6.2 and 10.6 grade level. This is too difficult to read for this cohort of the population.



86.6% of the audience is not being communicated with



Key Finding 2

Only 6 out of 30 insurers have an acceptable complex word density

[Plainlanguage.gov](https://www.plainlanguage.gov) released federal guidelines describing complex words and phrases.¹³

We recommend a level of complex language of 1% or lower (see Methodology - Page 20). Only 6 insurers scored at this level.

Top 6 Performers

	Readability		Grade Level		Passive		Long		Complex	
	Score	Rank	Score	Rank	Score	Rank	Score	Rank	Score	Rank
Amerigroup	59	11	7.2	13	4.0%	13	4.4%	17	0.74	1
Kaiser Permanente	64	1	6.6	9	2.5%	6	5.7%	21	0.76	2
AARP	62	2	7	11	4.0%	11	7.2%	25	0.79	3
Emblem Heath	60	9	7.3	14	4.9%	18	6.4%	23	0.89	4
Health Markets	55	17	7.4	15	4.4%	16	5.8%	22	0.90	5
Aetna	61	4	6.2	5	4.0%	11	3.3%	12	0.94	6

Compared to the top 6 performers, the bottom 6 scored an average of 2.37.

Bottom 6 Performers

	Readability		Grade Level		Passive		Long		Complex	
	Score	Rank	Score	Rank	Score	Rank	Score	Rank	Score	Rank
Manhattan Life	57	13	6.5	7	5.1%	21	3.8%	14	2.10	25
American National Ins.	48	24	8.4	23	6.4%	25	7.9%	26	2.13	26
Liberty Mutual	43	27	9.7	29	8.5%	28	11.5%	30	2.35	27
Centene - Michigan	52	20	7.9	21	13.0%	29	4.3%	16	2.39	28
Health Net	45	26	8.6	26	2.4%	5	4.4%	18	2.60	29
High Mark	37	30	10.6	30	14.7%	30	11.3%	29	2.66	30

Key Finding 3

1/3 of insurance companies communicate in an academic tone with overuse of passive voice

Passive voice conveys an academic tone, and is not as direct as active voice. Passive voice levels should be at 4% or lower (see Methodology - Page 21).

17 insurance companies missed the mark on passive voice use. They scored an average of 6.56% for passive voice use.

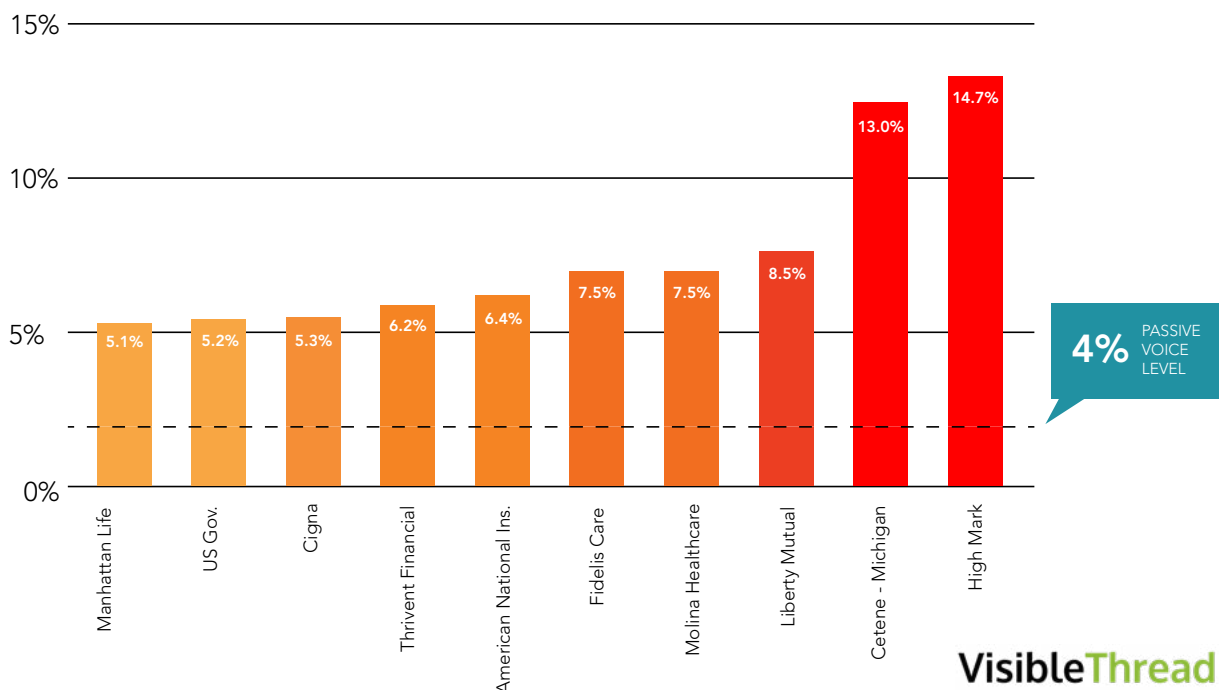
Manhattan Life scored 5.1% for the use of passive voice. They ranked 17th overall. They could significantly improve their overall rank by using less complex language and active voice.

Similarly, Molina Healthcare could enter the top 10 in our report if they reduced their 7.5% level of passive voice.

Using active voice makes communications clear and accessible for all readers.

Worst 10 Performers

The 10 insurers with the highest use of passive voice. The ideal level is marked at 4% or lower.



Key Finding 4

Insurers use 2x the recommended level of long sentences

Long, convoluted sentences make content harder to read. Insurers should aim for 5% long sentence use or less (see Methodology - Page 21).

Overall the insurers we analyzed scored an average of 4.68%. The bottom five came in at an average of 9.98%. A shocking 2x higher than the recommended level.

Worst 5 Insurers

	Readability		Grade Level		Passive		Long		Complex	
	Score	Rank	Score	Rank	Score	Rank	Score	Rank	Score	Rank
American National Ins.	48	24	8.4	23	6.4%	25	7.9%	26	2.13	26
State Farm Accolade	58	12	7.6	20	4.8%	17	8.1%	27	1.16	9
US Govt.	53	19	8.5	25	5.2%	22	11.1%	28	1.05	7
High Mark	37	30	10.6	30	14.7%	30	11.3%	29	2.66	30
Liberty Mutual	43	27	9.7	29	8.5%	28	11.5%	30	2.35	27

You can make more readable and accessible content by splitting long sentences.

Here’s an example from Kaiser Permanente. Most insurers tend to write in a similar style and tone of voice:

Original Copy

If you choose Original Medicare, you can purchase Medicare Supplemental Insurance plans — also called Medigap plans — to help you pay for care not covered by Parts A and B.

This sentence has 31 words, and a 15.5 grade level.

Suggested Copy

You can purchase Medicare Supplemental Insurance plans with Original Medicare. These plans are also called Medigap. They will help you pay for care not covered by Parts A and B.

Now we have three sentences, and a grade level of 7.6.

Key Finding 5

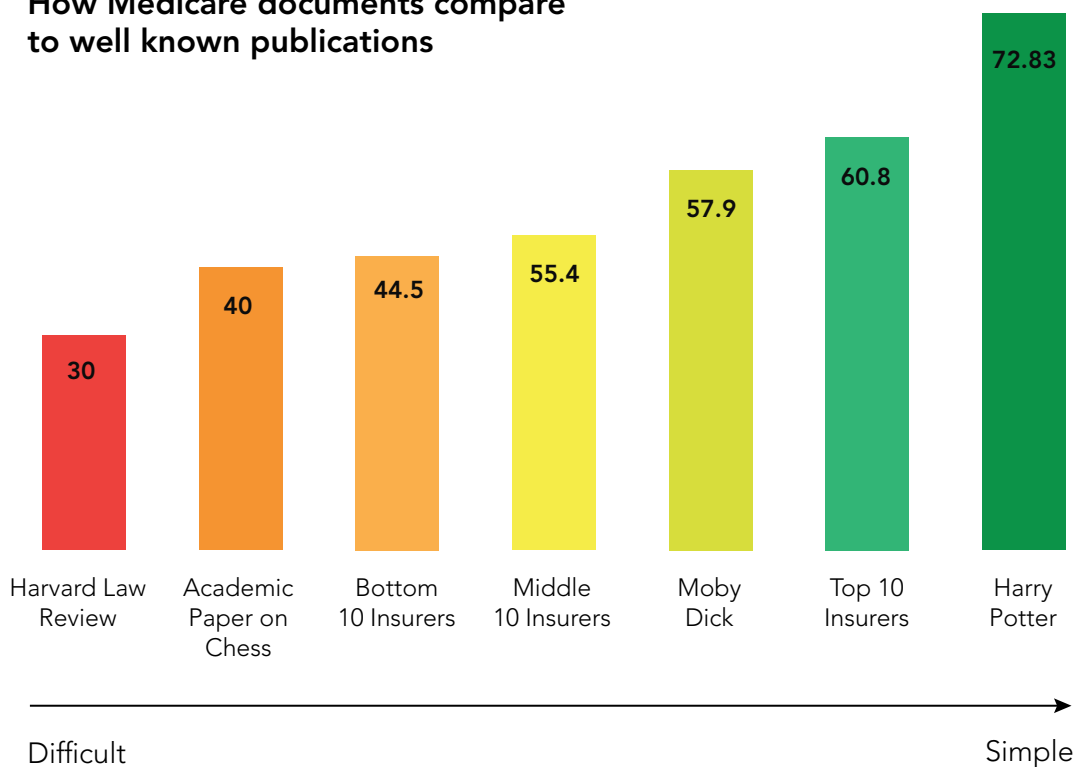
2/3 of insurers produce content more difficult to read than Moby Dick

Readability is a measure of reading ease. Higher scores mean content is easier to understand and more accessible. Experts¹⁴ suggest aiming for a score of 60 when writing in plain English for the average American consumer. By way of example, Moby Dick scores 57.9 on this scale.¹⁵

We used the Flesch Kincaid Reading Ease Test to score the insurers in three categories:

1. Top 10 performers
2. Mid 10 performers
3. Bottom 10 performers

How Medicare documents compare to well known publications



TAKEAWAYS

Overly complex language alienates audiences

Our research shows that insurance companies publish Medicare content that is too complex for the intended audience; those 65 and over. All consumers value transparent, understandable content. And when it comes to health insurance, our research indicates this is not the case.

Large organizations producing content face challenges

Maintaining quality when content volumes are rising can be difficult.



Even smaller insurance companies can struggle with the sheer volume of content produced. They must create and maintain website content, brochures, blogs, compliance documentation and more. Modern AI and NLP solutions can now help content teams identify complex content. Scoring content for metrics like the grade level can improve content quality and accessibility.

Content is often produced by subject matter experts, who are not professional writers.

Subject matter experts are a valuable source for new content. However, many are poor writers. Content teams struggle to review and edit content originating from subject matter experts. Here, technology can help. If you can analyze hundreds of documents or webpages in minutes, then solutions like VisibleThread can drive plain language programs.

The content culture needs to be managed as much as the content

Most industries struggle with content quality and clarity. Insurance is among the worst offenders. The causes can vary, but culture is often a large influence. For instance, content creators may assume complex content is desirable because that's what they encounter elsewhere. Culture can create a preconception that regulations and compliance matters must be complex. And because they are highly educated, industry employees overestimate the average customer's sophistication. This is a more pronounced issue when the audience is disadvantaged or in the case of this study elderly. Leadership needs to define what quality means. Teams should be outfitted with the tools to efficiently enforce the standards.

Making simple changes can have a big impact on clarity

Several insurers could improve their rankings by focusing on four simple changes:

1. Reduce their sentence length
2. Eliminate passive voice
3. Choose less complex words
4. Adopting technology

Earlier we mentioned Molina Healthcare who scored well in three categories. If they reduced passive voice (7.5%) and complex word use (1.50) they would enter the top 10.

In our research, AARP come in the top 10 (8). Cutting their use of long sentences (7.2%) could drive more accessible content.

Cigna come in at rank 23 overall. However, they came in an impressive second for long sentence use. Unfortunately, passive voice (5.3%), a 9-grade level and 1.65 use of complex words and phrases dragged down their overall score.

Using the newest technology in the fields of AI (Artificial Intelligence) and NLP (Natural Language Processing) means you can measure and benchmark content clarity. VisibleThread provides this technology to visionary organizations who use it to analyze and improve content at scale.

GET YOUR READABILITY SCORE

Interested in how your content measures up?

email: info@visiblethread.com

RANKINGS

Full Rankings For All 30 Organizations

	Readability		Grade Level		Passive		Long		Complex	
	Score	Rank	Score	Rank	Score	Rank	Score	Rank	Score	Rank
1. MJHS - Elderplan	62	2	6	3	1.5%	3	0.9%	1	1.23	11
1. Well Care	61	4	5.4	1	0.7%	1	1.5%	4	1.20	10
3. Care Source	61	4	6	3	1.8%	4	2.2%	7	1.32	13
4. Aetna	61	4	6.2	5	4.0%	11	3.3%	12	0.94	6
5. Kaiser Permanente	64	1	6.6	9	2.5%	6	5.7%	21	0.76	2
6. Health Partners	61	4	5.9	2	3.2%	8	2.3%	8	1.55	20
7. Magellan Health	60	9	6.6	9	1.4%	2	2.8%	11	1.48	17
8. AARP	62	2	7	11	4.0%	11	7.2%	25	0.79	3
9. Amerigroup	59	11	7.2	13	4.0%	13	4.4%	17	0.74	1
10. IndependenceBlueCross	55	17	6.5	7	3.0%	7	1.4%	3	1.60	21
11. Nationwide	52	20	7	11	3.9%	10	1.7%	6	1.41	15
12. Molina Healthcare	61	4	6.4	6	7.5%	27	2.6%	9	1.50	19
13. Emblem Health	60	9	7.3	14	4.9%	18	6.4%	23	0.89	4
14. United Healthcare	56	16	7.4	15	4.1%	14	2.8%	10	1.33	14
15. Health Markets	55	17	7.4	15	4.4%	16	5.8%	22	0.90	5
16. Anthem	57	13	7.4	15	4.9%	20	5.4%	20	1.09	8
17. Manhattan Life	57	13	6.5	7	5.1%	21	3.8%	14	2.10	25
18. Humana	52	20	8.2	22	3.5%	9	4.5%	19	1.28	12
19. State Farm - Accolade - Prominence	58	12	7.6	20	4.8%	17	8.1%	27	1.16	9
20. Primera Blue Cross	57	13	7.5	19	4.2%	15	7.0%	24	1.43	16
21. Thrivent Financial	52	20	7.4	15	6.2%	24	3.4%	13	1.68	23
22. US Gov	53	19	8.5	25	5.2%	22	11.1%	28	1.05	7
23. Cigna	40	28	9	27	5.3%	23	1.2%	2	1.65	22
24. Health Net	45	26	8.6	26	2.4%	5	4.4%	18	2.60	29
24. Geisinger	38	29	9.1	28	4.9%	18	1.5%	5	2.08	24
26. Fidelis Care	48	24	8.4	23	7.5%	26	3.9%	15	1.48	18
27. Cetene - Michigan Complete Health	52	20	7.9	21	13.0%	29	4.3%	16	2.39	28
28. American National Insurance	48	24	8.4	23	6.4%	25	7.9%	26	2.13	26
29. Liberty Mutual	43	27	9.7	29	8.5%	28	11.5%	30	2.35	27
30. High Mark	37	30	10.6	30	14.7%	30	11.3%	29	2.66	30

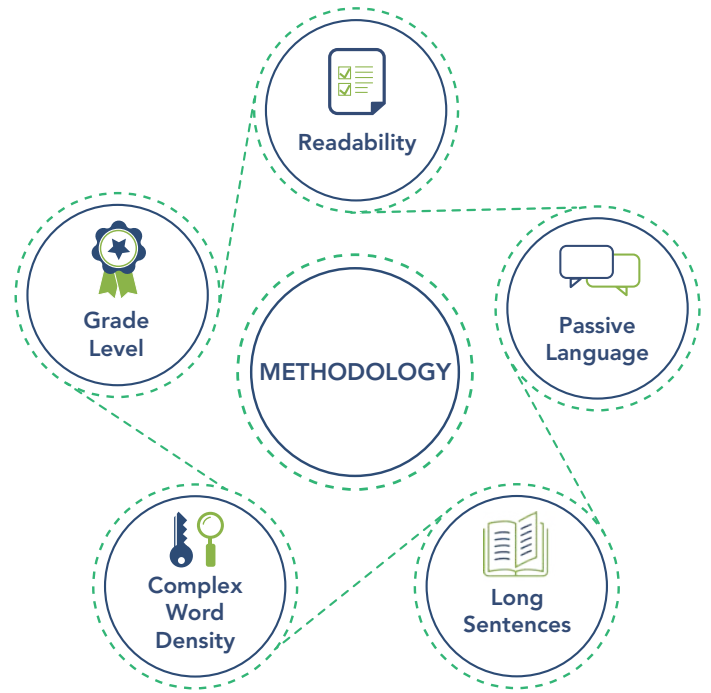
METHODOLOGY

About the sample

We sampled Medicare documents from 30 top U.S. health insurers between Nov 20th and 30th 2018.

We used well established plain language metrics for each of the health insurers in our research.

All documents analyzed were publically available on the dates of our analysis. We provide links to the PDFs in the Appendix.



Grade Level

Metric	Formula
<p>Grade level refers to the estimated school grade level completed. It can be correlated to the number of years school was attended.</p> <p>To address the general population, aim for a grade level of 8 or lower.</p> <p>This is based on the Flesch-Kincaid Reading Ease Index.</p>	<p>Measurement from 4th grade to college education.</p>



Readability

Metric	Formula
<p>Readability ranges from 1 to 100. 100 is the top mark. If communicating with citizens, aim for at least 50.</p> <p>This is based on the Flesch-Kincaid Reading Ease Index.</p>	$(206.835 - (1.015 \times \text{Average Sentence Length}) - (84.6 \times \text{Average Syllables per word}))$

 **Passive Language**

Metric	Formula
<p>The % rating is the proportion of sentences containing passive voice. Passive language is where the subject of a sentence is acted on by the verb. For example:</p> <p>“Quality is monitored” vs “We monitor quality”</p> <p>If you use active voice, you will increase clarity and strength. You will also flush out the ‘actor’, i.e who did the action?</p> <p>To communication clearly keep passive voice to 4% or less in communication.</p> <p>This benchmark is based on the cohort analysis of billions of words and documents from VisibleThread customers over the past 5 years.</p>	<p>$(\text{Passive Sentences} / \text{Total Sentences} * 100)$</p>

 **Long Sentences**

Metric	Formula
<p>The % rating is the proportion of sentences that are longer than 25 words. Word sentences mask multiple concepts. Splitting up these sentences will result in a clearer message.</p> <p>Keep long sentences to 5% or less in communication.</p> <p>This benchmark is based on the cohort analysis of billions of words and documents from VisibleThread customers over the past 5 years.</p>	<p>$(\text{Long Sentences} / \text{Total Sentences} * 100)$</p>

 **Complex Word Density**

Metric	Formula
<p>The density rating is the proportion of complex words relative to the total word count. This scan looks for complex words/phrases based on federal guidelines. See here for the list scanned.</p> <p>Replacing complex words with simpler words helps your readers concentrate on your content. This is why we recommend 1% or less complex language in communications.</p> <p>This benchmark is based on the cohort analysis of billions of words and documents from VisibleThread customers over the past 5 years.</p>	<p>$(\text{Complex Words} / \text{Total Words} * 100)$</p>

Flesch-Kincaid Reading Ease Test

Score	School level	Notes
100-90	5th grade	Very easy to read. Easily understood by an average 11-year old student
90-80	6th grade	Easy to read. Conversational English for consumers.
80-70	7th grade	Fairly easy to read.
70-60	8th & 9th grade	Plain English. Easily understood by 13-15 year olds
60-50	10th to 12th grade	Fairly difficult to read.
50-30	College	Difficult to read.
30-0	College graduate	Very difficult to read. Best understood by University graduates.

Source: Flesch, Rudolf. "How to Write Plain English". *University of Canterbury*

ABOUT

VisibleThread provides content analysis solutions for web, digital and communication professionals.

Our solutions help embed plain language programs in large commercial and government organizations, and automated the reviewing and editing process.

Our solutions allow customers to:

- Analyze thousands of documents and complete websites in minutes.
- Support Plain Language programs across the entire organization.
- Identify risky and complex language with objective metrics for content creators.
- Show executives how their Plain Language programs are performing.
- Automatically track all content improvement in easy to use dashboards.
- Flag compliance issues.

VisibleThread provides content analysis solutions for web, digital and communication professionals.



If you have any questions, or would like a specific sector report,
email: info@visiblethread.com

For questions on the metrics or methodology,
email: support@visiblethread.com

APPENDIX & REFERENCES

APPENDIX - DOCUMENTS ANALYZED

Insurer	Document Name	Document Link
Primera Blue Cross	30416	https://www.premiera.com/documents/030416.pdf
Liberty Mutual	AE_Retiree_Plan_Changes	https://cache.hewitt.com/ybr/R516/02363_ybr_ybrfndt/downloads/AE_Retiree_Plan_Changes.pdf
Fidelis Care	2019-FidelisCare-SummaryofBenefits-MedicareAdvantageFlex0Premium-English	https://www.fideliscare.org/Portals/0/Medicare/2019/MedicareAdvantage/2019-FidelisCare-SummaryofBenefits-MedicareAdvantageFlex0Premium-English.pdf
AARP	Meet-Medicare-Booklet-AARP	https://www.aarp.org/content/dam/aarp/health/medicare/insurance/2015-07/Meet-Medicare-Booklet-AARP.pdf
American National Ins.	American-National-Brochure	https://thebrokerageinc.com/wp-content/uploads/American-National-Brochure.pdf
Amerigroup	TXTX_CLA1_SB_ENG	https://myamerigroup.com/Medicare2018/Documents/TXTX_CLA1_SB_ENG.pdf
Emblem Health	2018_Medicare_Info_Brochure	https://www.emblemhealth.com/~media/Files/PDF/brokers/2018_Broker_ToolKit/2018_Medicare_Info_Brochure.pdf
Health Partners	entry_202841	https://2eofnyhzmjez0vxh3npwlwcf-wpengine.netdna-ssl.com/wp-content/uploads/2017/09/HealthMarkets-Guide-to-Medicare_Online_Sept2017.pdf
Health Markets	HealthMarkets-Guide-to-Medicare_Online_Sept2017	https://www.healthpartners.com/ucm/groups/public/@hp/@public/documents/documents/entry_202841.pdf
High Mark	hfm-chapter2-2	https://content.highmarkprc.com/Files/EducationManuals/HFM/hfm-chapter2-2.pdf
Kaiser Permanente	Kaiser Permanente Group Guide to Medicare	https://medicare.kaiserpermanente.org/medicare/pdfs/plans_current/kp_guide_medicare_dpa.pdf
State Farm - Accolade - Prominence	PHP_Medicare-Decision-Guide_5-17	https://prominencemedicare.com/wp-content/uploads/2018/09/PHP_Medicare-Decision-Guide_5-17.pdf
Thrivent Financial	thrivent_medsupp_brochure_TN	http://smsteam.net/wp-content/uploads/products/med-supp/thrivent-financial/thrivent_medsupp_brochure_TN.pdf
US Govt.	10050-Medicare-and-You	https://www.medicare.gov/pubs/pdf/10050-Medicare-and-You.pdf
Aetna	Aetna Medicare Essential Plan %28PPO%29 H5521-168	http://www.ncdoi.com/_Publications/Medicare%20Advantage%20Plans%20Summary%20of%20Benefits%202018/Aetna%20Medicare%20Essential%20Plan%20(PPO)%20H5521-168.pdf
Anthem	Y0114_19_35663_U_M_067	https://shop.anthem.com/medicare/docs/2019_PPO_SB_ABS_ME_ACC_002.pdf
Cetene - Michigan Complete Health	2019-MI-SB-H9487-001-MMP	https://mmp.michigancompletehealth.com/content/dam/cetene/michigan-complete-health/pdfs/2019-MI-SB-H9487-001-MMP.pdf
Health Net	2019-OR-SB-H5439-010-MA	https://or.healthnetadvantage.com/content/dam/cetene/healthnet/pdfs/medicare/2019/OR/2019-OR-SB-H5439-010-MA.pdf
Humana	documents	http://apps.humana.com/marketing/documents.asp?file=2898142
Molina Healthcare	medicaid-member-handbook	https://www.molinahealthcare.com/members/ut/en-US/PDF/Medicaid/medicaid-member-handbook.pdf
Magellan Health	2018_MRx_Summary_of_Benefits_R3_FINAL_web	https://medicare.magellanrx.com/member/external/medicare/medd_common/doc/en-us/2018_MRx_Summary_of_Benefits_R3_FINAL_web.pdf
MJHS - ElderPlan	ELDERP012119-01_MedicareSavingsGuide2018_ENG_ForWeb	https://www.elderplan.org/wp-content/uploads/2015/11/ELDERP012119-01_MedicareSavingsGuide2018_ENG_ForWeb.pdf
Care Source	untitled	https://www.caresource.com/documents/2018-ma-summary-of-benefits/
United Healthcare	untitledUHG	https://advantages.aarp.org/content/dam/asi/PDF/Medicare-Made-Clear-Guide-2018.pdf
Well Care	WellCare%2B%28HMO-POS%29%2B-SOB%2BH1112-032%2B201	https://static1.squarespace.com/static/586bfe35cd0f683a8ae53658/t/59b00cdbe42d61079841181/1504709858296/WellCare+%28HMO-POS%29+SOB+H1112-032+2017.pdf
Nationwide	14f7deb4-5824-47fb-9b15-7b181ec53ac5	https://static.fmgsuite.com/media/documents/14f7deb4-5824-47fb-9b15-7b181ec53ac5.pdf
Cigna	h4454-020-cigna-healthspring-totalcare-dsnp-sb	https://www.cigna.com/static/docs/medicare-2018/h4454-020-cigna-healthspring-totalcare-dsnp-sb.pdf
Manhattan Life	manhattan_medsupp_brochure_ID	http://smsteam.net/wp-content/uploads/products/med-supp/manhattan-life/manhattan_medsupp_brochure_ID.pdf
IndependenceBlueCross	2018_blue_solutions	http://www.campbellagencies.com/assets/Uploads/2018-IBC-Uploads/2018-blue-solutions.pdf
Geisinger	2018_03_27_OPS_GOLD_provider_bulletin	https://www.geisinger.org/~media/OneGeisinger/Files/PDFs/Provider/Navinet/OpsBulletins/2018_03_27_OPS_GOLD_provider_bulletin.pdf

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- 1 <https://www.census.gov/newsroom/facts-for-features/2017/cb17-ff08.html>
- 2 <https://www.edelman.com/post/trust-in-healthcare-2018>
- 3 <https://www.healthcare.gov/glossary/pre-existing-condition/>
- 4 <https://www.verywellhealth.com/understanding-pre-existing-conditions-1738432>
- 5 <https://www.plainlanguage.gov/law/>
- 6 <https://www.plainlanguage.gov/resources/content-types/healthcare/>
- 7 <https://health.gov/healthliteracyonline/about/>
- 8 <https://publicintegrity.org/health/opinion-finally-plain-english-from-health-insurance-companies/>
- 9 <https://www.medicare.gov/about-us/plain-writing>
- 10 <http://www.mintel.com/north-american-consumer-trends/>
- 11 <https://nces.ed.gov/>
- 12 <https://health.gov/communication/literacy/issuebrief/>
- 13 <https://plainlanguage.gov/guidelines/words/use-simple-words-phrases/>
- 14 [Flesch, Rudolf. "How to Write Plain English". University of Canterbury](#)
- 15 Based on the Flesch Kincaid Reading Ease Test - see page 22

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