Marketing Operational Guidelines

Developed for the Statewide Medicaid Managed Care Plans
and Dental Plans

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MARKETING OVERSIGHT UNIT

The Marketing Oversight Unit (MOU) was formed in 2014 for the purpose of providing oversight of the Managed Care Plans' marketing activities in the Statewide Medicaid Managed Care Program (SMMC Program). The MOU began with reviewing and determining Contract compliance for marketing materials based on the 2013-2018 SMMC Contract Provisions. In 2015, the MOU started the Marketing Secret Shopper Program for the purpose of monitoring Managed Care Plan's marketing, public, and educational events to ensure compliance with the SMMC Contract. Currently, the MOU is responsible for marketing material reviews, the Marketing Secret Shopper Program, website and social media reviews, and determining whether Plans are meeting all Contract provisions for marketing in Attachment II, Section IV. of the SMMC Contract.

The SMMC Contract defines marketing as "any activities or use of materials by the Managed Care Plan with the intent to draw an enrollee or potential enrollee's attention to a plan or to influence a potential enrollee or enrollee's decision-making process when selecting a plan for enrollment or deciding to remain enrolled in the plan. (That is, retention-based marketing)."

There are six main components that MOU analyses to determine if a material meets the marketing definition.

1. Benefit information: Benefit information is one of the most enticing aspects of marketing in managed care. Managed Care Plans and Dental Plans offer a myriad of benefits, including all standard Medicaid benefits and selected expanded benefits. Advertising these benefits (such as free transportation, equine therapy, the 24-hour nurse hotline and more) is a common way to market in the SMMC Program.

2. Verbiage to entice: Statements such as "Want to get more out of your Medicaid Plan?" and "Come check out the extra benefits our Medicaid Plan has to offer" are used to attract potential enrollees or enrollees and compel them to seek more information provided by the Managed Care Plan or Dental Plan or stay enrolled in the Managed Care Plan or Dental Plan.

3. Calls to action: These are phrases that entice people to quickly access information about Managed Care Plans and Dental Plans, such as "Hurry!" or "Time is running out!"

4. Enrollment information: Statements such as "Enroll" "Join", "Choose", or "Change Plans" constitute enrollment information. Additionally, materials containing the Enrollment Broker's contact information are automatically deemed marketing. Inclusion of the Enrollment Broker's contact information on a material shows intent to drive enrollment into that particular Managed Care Plan or Dental Plan. Enrollment information for retention-based marketing may include phrases such as "Stay with us" or "Keep your benefits".

5. Plan-specific information: Health programs, statistics, studies, and other aspects of healthcare quality outside of standard and expanded benefits. Managed Care Plans may also use allowable superlatives, testimonials, and endorsements to showcase certain aspects of their health plans.

6. Testimonials and endorsements: An enrollee, celebrity, or influencer provides a statement regarding the quality or merit of the Managed Care Plan or Dental Plan.

*Note: Member materials that do not contain marketing will continue to be reviewed by the Agency Contract Manager. Member materials containing marketing must be submitted to the Marketing Oversight Unit for review and approval.

TYPES OF MARKETING MATERIALS[1,2]

There are four types of marketing materials that are reviewed by the Marketing Oversight Unit - branding, written materials, scripts, and nominal gifts. Branding materials are broken down into three specific subtypes – indoor, outdoor, and digital branding. Indoor branding includes wall posters, banners, and electronic posters. Outdoor branding includes billboards, bus wraps, and bus stop posters. These two subtypes of branding have similar requirements to meet for approval. The branding material must be in publication-ready format, must include a readability score of under 4.9 including redactions, benefit disclaimers if benefits are included on the material, and the Enrollment Broker's phone number when enrollment content is included on the material. Indoor branding materials must contain TTY/TDD numbers if the Managed Care Plan or Dental Plan's customer service number and/or the Enrollment Broker's phone number is included on the material. Outdoor branding materials do not require TTY/TDD numbers.

Digital branding materials are reviewed slightly different from indoor and outdoor branding materials because they are available on the internet. Digital branding materials must meet all of the requirements listed above for indoor/outdoor branding, plus the inclusion of the Plan's contracted counties (not applicable for statewide Plans). TTY/TDD numbers are required on digital branding materials as well. Due to character limits on digital branding materials, it may not be possible to include all required disclaimers, the Enrollment Broker's contact information, TTY/TDD numbers, and contracted counties on the digital branding material itself. Since digital branding materials usually include a clickable link to a website, Managed Care Plans and Dental Plans can include their benefit disclaimers, Enrollment Broker's contact information, TTY/TDD numbers, and contracted regions on the linked website rather than the material itself.

The next material type is written materials. These include brochures, flyers, leaflets, event invitations, and business reply cards. Written materials must meet all of the same requirements as indoor branding materials plus the inclusion of the non-discrimination notice and taglines in the required languages for the Plan's contracted counties. TTY/TDD numbers are required on written materials; however, contracted counties are not required.

Scripted marketing materials include telephonic scripts, marketing scripts, and broadcast scripts. Telephonic scripts are used by marketing agents when speaking to potential enrollees or enrollees over the phone or for interactive voice responses. Marketing scripts are typically used

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[1] This section includes some examples of marketing materials and does not indicate all possible marketing material formats.
[2] There may be additional requirements for approval of marketing materials not listed here. Review the SMMC Contract for more information.

by marketing agents at marketing events to present Managed Care Plan or Dental Plan information to a group of people, such as PowerPoint presentations. Broadcast scripts are materials used to send out information to large groups of people, such as on radio or televisions or through websites and social media platforms. These materials all require readability scores of under 4.9 including redactions, benefit disclaimers when benefits are included on the material, and the Enrollment Broker's contact information when enrollment information is included.

Broadcast scripts such as television and digital radio/video advertisements, social media, and websites require TTY/TDD numbers. Radio scripts, marketing scripts, and telephonic scripts do not require TTY/TDD numbers. Websites require the non-discrimination notice and taglines in the required languages for the Plan's contracted counties. When a final product is not available until after official approval by the Agency, a story board or a transcript is acceptable. Contracted counties are required on all broadcast scripts (not applicable for Statewide Plans). Benefit disclaimers, Enrollment Broker's contact information, TTY/TDD numbers, and contracted counties can be included on a linked website rather than the material itself for certain broadcast scripts, such as digital radio and video materials or social media posts. Some Plans have the same marketing material available on a website and in a PDF printable format. When this situation occurs, the Plan must submit the material as a broadcast script and as a written material and adhere to the requirements of each separate marketing material.

Nominal gifts are items given away to potential enrollees, enrollees, and the general public at marketing, public, and educational events. The cost of a nominal gift cannot exceed fifteen dollars ($15). The Managed Care Plan or Dental Plan is required to submit proof of the cost of the nominal gift along with the nominal gift submission. Only five (5) pieces of Plan information are allowed on nominal gifts - the Plan's name, logo, tagline, phone number, and website. If more information about the Plan is included on the nominal gift, such as benefit or enrollment information, the material will be reviewed as a written material and must meet all of the requirements of a written material.

MARKETING MATERIAL SUBMISSION PREPARATION AND PROCESS

Each material must be submitted via the Secure File Transfer Protocol (SFTP) site with a unique file name. The file naming convention for submitted materials is the 3-digit Plan identifier, 2-digit year and 2-digit month of submission, material type indicator (BRA, NVL, BSC, TSC, MSC, WMA), a six-digit unique identifier for the material itself, and N (new), R (revision), or U (updated) at the end of the file name. New materials are materials that have never been submitted to the MOU before. Revised materials are materials previously denied and the materials are being resubmitted with corrections. Updated materials are materials that were previously approved but are being replaced with an updated version.

Materials submitted to the SFTP must be submitted as separate files. Do not include more than one material on a single file. Most materials, other than certain scripts, must be submitted in

publication-ready format. Publication-ready format is defined as the final edition of a marketing material ready for dissemination which includes all written content and graphics. For certain broadcast scripts, it may not be feasible for a Plan to create the final product prior to receiving approval from the MOU. This may be the case for digital and traditional radio, television, and video advertisements. In these situations, the Plans may submit storyboards and scripts for the review process.

Include a readability score with each material, except nominal gifts. Materials that include [brackets] or <carets> will not be approved as the MOU does not approve materials with interchangeable written content.

Before the final submission to the SFTP, ensure that materials meet the marketing definition, confirm that the appropriate material types are indicated in the file names, verify that the materials meet all Contract requirements, and ensure that the readability score is included with the submission and is under 4.9 with redactions. Finally, double-check to ensure the file naming convention is correct.

Once the materials are completely prepared for submission, the Managed Care Plans and Dental Plans will submit those materials by the 5th of the month. If the 5th falls on a weekend or holiday, the materials will be submitted on the next business day. Upload the materials to the Agency's SMMC SFTP site, in the appropriate material type submission folders – Branding, Broadcast Scripts (used for all scripts including marketing and telephonic), Nominal Gifts, and Written Materials.

MARKETING MATERIALS NOTICE OF SUBMISSION

A Marketing Materials Notice of Submission (NOS) is required with each month's submission of materials. The Managed Care Plan or Dental Plan complete the submission information – Date of Notice of Submission, Managed Care Plan or Dental Plan name, Date Materials Uploaded to SFTP, and the name and email address of the person submitting the materials and NOS. Then, the NOS will contain each individual material submitted to the SFTP site. Each material's material type, file name, description, intended use, and intended audience will be listed out and if a material includes a linked website, the URL link to the website will be included on the NOS. Do not include file names for readability scores or readability scores for individual materials on the NOS. Managed Care Plan and Dental Plans should include as much detail about the material description as possible to aid in the review and approval of the material. Email the NOS to the AHCA Administrator and Program Administrator of the Tampa Plan Management Operations office upon submission to the SFTP site.

MARKETING MATERIALS NOTICE OF SUBMISSION
SMMC MANAGED CARE AND DENTAL PLANS

Plan Information		Instructions to Plans
Date of Notice of Submission:	Click to enter date	1. **Material Type:** Enter each material type using the drop-down box menu
Managed Care/Dental Plan Name:		2. **Material File Name:** Enter each material file name as they appear on each material uploaded to the FTP
Date Materials Uploaded to FTP:	Click to enter date	3. **Material Description:** Describe each material in detail, including medium and platforms
Submitted By: • **Plan Representative Name** • **Email Address**		4. **Material URL(s) and/or Link(s):** List all URLs linked to this material and links contained within the material 5. **Intended Use:** Provide a thorough description of how the material will be used. 6. **Intended Audience:** Select each material's audience using the drop-down box menu 7. **Email Notice of Submission to the MOU:** ✓ Sandra.Brown@ahca.myflorida.com ✓ Kelly.Kollen@ahca.myflorida.com

This is to notify the Agency that the materials listed below have been placed in the SMMC FTP Marketing subfolders.

Material Type Example: Broadcast Script	Material File Name Example: MCP2012BSC123456N	Material Description Example: Facebook Carousel Ad	Material URL(s) and/or Link(s) Example: Ad links to planwebsite.com. No URLs or Links, leave blank.	Intended Use Example: Encourage prospective members to choose MCP during open enrollment	Intended Audience Example: Both
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MARKETING MATERIAL REVIEWS AND MCAC

Upon receipt of the material submissions on the SFTP site and the NOS, the MOU will review the material to ensure all SMMC or Dental Contract marketing provisions are met. Managed Care Plans and Dental Plans are then notified in writing of any materials that are denied, deemed not marketing, and nominal gift approvals or denials.

Materials that meet all SMMC or Dental Contract marketing provisions are submitted to the Medical Care Advisory Committee (MCAC) for a consultative review of marketing materials. MCAC is comprised of a group of health professionals familiar with the needs of low-income population groups and with members of consumers' groups including recipients.

Once MCAC members provide their feedback on the materials, the MOU reviews feedback to determine whether or not a final approval of the material can be issued, or if recommendations should be made to the Managed Care Plan or Dental Plan regarding their materials. Once the MOU determines the final decisions on the material and any MCAC recommendations for these

materials, the Managed Care Plans and Dental Plans are notified in writing of final materials review decisions and recommendations.

MCAC provides this consultative review to ensure that materials accurate and not misleading, confusing or defrauding recipients or the Agency, and that materials are free from any unfair methods of competition or deceptive acts or practices. Managed Care Plans and Dental Plans should take extra care to ensure all information on marketing materials is accurate, especially when providing points of contact for Medicaid eligibility and Medicaid enrollment on marketing materials. Ensure that only the Department of Children and Families is referenced for Medicaid eligibility and only the Enrollment Broker is referenced for Medicaid enrollment. Managed Care Plan or Dental Plan contact information cannot be referenced for Medicaid eligibility or enrollment.

Another frequent MCAC recommendation pertains to Long-Term Care Plans (LTC). Eligibility and enrollment are handled differently for LTC than Managed Medical Care (MMA). MCAC recommends including the following LTC eligibility and enrollment information in materials to guide potential enrollees and enrollees through the process.

To become an LTC member there are a few steps involved prior to selecting an LTC Plan.

1. Screening

2. Eligibility

3. Enrollment

The following link outlines the steps to become enrolled in the LTC program.

https://ahca.myflorida.com/medicaid/statewide_mc/smmc_ltc.shtml

Questions regarding the process for submission and review of marketing materials will be emailed to the AHCA Administrator and/or the Program Administrator of the MOU.

ACRONYMS

Acronyms	Full Description
AHCA	Agency for Health Care Administration
BRA	Branding Material
BSC	Broadcast Script
MMA	Managed Medical Assistance Plans
MCAC	Medical Care Advisory Committee
MCP	Managed Care Plan
MOU	Marketing Oversight Unit
MSC	Marketing Script
NOS	Marketing Materials Notice of Submission
NVL	Nominal Gift
LTC	Long-Term Care Plans
SMMC	Statewide Medicaid Managed Care
SFTP	Secure File Transfer Protocol
TSC	Telephonic Scripts
WMA	Written Material