

# Health Plan, Inc.

# Marketing/Sales Policy & Procedure

**Subject:** Medicaid Marketing Practices  
**Effective Date:**  
**Review Date:**  
**Next Review Date:**

**Line of Business** (check all that apply)

Commercial: FI ; SF

Medicaid

Medicare

**Document Number:** \_\_\_\_\_

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## I. SCOPE:

This document describes the practices that Health Plan, Inc. will follow for marketing to Medicaid recipients.

## II. POLICY:

Health Plan will promote its Medicaid services to the general population in accordance with authorized marketing practices, as contained in the Medicaid Contract.

- A. Health Plan will not engage in any direct marketing to Medicaid recipients.
- B. Health Plan will not offer inducements in the form of compensation, rewards or supplemental benefits to encourage recipients to enroll or remain enrolled.
- C. Health Plan will seek approval from the [State] Department of Community Health (MDCH) prior to final printing and use of all written or oral marketing materials, as described in Policy & Procedure AS-03.

## III. PROCEDURE:

- A. Government Program Leaders for all Health Plan geographic service area sites will:
  - 1. Review and approve all Medicaid marketing/promotional materials for consistent use throughout all geographic regions.
  - 2. Collaborate and reach consensus on all Medicaid member information and promotional material, and arrange for filing and approval through the Regional Compliance Department consistent with P&P AS-03.
  - 3. Review acceptable and unacceptable marketing practices and potential penalties for non-compliance with management teams and all Medicaid program staff no less than annually. (See Attachment A).
- B. The Regional Compliance Department will:
  - 1. File marketing/promotional materials with the MDCH on behalf of all Plans.
  - 2. Inform the Plan government Programs Managers upon approval of materials.
  - 3. Maintain a copy of all regulatory filings.

## ATTACHMENT A

- A. Allowed General Population Marketing
  - 1. Newspaper articles
  - 2. Newspaper/magazine advertisements
  - 3. Signs/Billboards
  - 4. Pamphlets/Brochures
  - 5. Television/radio advertising
  - 6. Noncapitated plan sponsored events
  - 7. Public transportation
  - 8. General population mailings
  
- B. Prohibited Locations and Practices.
  - 1. FIA Offices
  - 2. Provider offices
  - 3. Health plan “fairs”
  - 4. Malls or commercial retail establishments
  - 5. Hospitals
  - 6. Check cashing establishments
  - 7. Door-to-door/telemarketing
  - 8. Community centers/churches
  - 9. Direct mail
  - 10. WIC clinics
  
- C. Penalty

The DCH may impose monetary / restricted enrollment penalties. The DCH may suspend all enrollment of new recipients for a period of sixty (60) days from the date of notification of the violation.