

# Plan de Salud del Gobierno



## Marketing Rules and Guidelines

# Aplicability

## Content Marketing

Art and content of all marketing materials

- writing,
- images,
- sound,
- videos
- Brochures
- Marquees

# Aplicability

## Content Marketing

Art and content of all marketing materials

- exhibitions
- Presentations
- posters,
- Banners
- loose sheets

## Aplicability

# Content Marketing

Art and content of all marketing materials

- promotional items,
- street banners
- shirts,
- announcements
- press release for media (traditional, digital, social networks, internet),
- others.

# What is Marketing

- Marketing means the activities and use of materials that are conducted with the intent to draw a beneficiary's attention and to influence a beneficiary's decision-making process when selecting an MCO for enrollment or deciding to stay enrolled in a plan (that is, retention-based marketing).
- Additionally, marketing includes any materials that contain information about the MCO's benefit structure, cost sharing, and measuring or ranking standards.

# Content Guidelines

Must not contain third parties or provider's

- specific names
- logos
- Trademarks
- slogan

# Content Guidelines

Will refer to the Government Health Plan as:

- Government Health Plan, Vital
- Plan Vital









Marketing must complies with HIPAA

Content **MUST** be simple and suitable such that a beneficiary of 4th grade schooling can understand its content.



# GRAPHIC IMAGES ASES



	C 100% M 29% Y 19% B 0%		C 46.48% M 0% Y 87.5% B 0%		C 60.55% M 22.66% Y 13.28% B 0%
	C 0% M 0% Y 0% B 60%		C 80.47% M .39% Y 96.48% B 60%		C 80.86% M 50.39% Y 23.83% B 3.13%
			C 70.7% M 28.52% Y 100% B 12.89%		C 100% M 87.5% Y 32.03% B 20.7%





# GRAPHIC IMAGE GOVERNMENT HEALTH PLAN



## Institutional Logo (PRHIA), MCO Logo and header

- PRHIA's logo must be used with blue, green, and grey as specified in the Graphic image this image cannot be altered.
- PRHIA's logo must be located in the header and on the cover of all materials.
- PRHIA's logo must be used in its color or black and white version, according to the purpose of the piece.

# Institutional Logo (PRHIA), MCO Logo and header

- The MCO's logo will be placed on the bottom or back of each piece, as applicable, but smaller than the PRHIA logo.
- All headings must have: VITAL logo, PRHIA logo, and title of the material.
- Each material will include in the lower or back part, as applicable, a button with PRHIA's customer service number
- They must also include provider and beneficiary customer service contact numbers for the MCO, and the web portal information.
- Banners and tents shall be identified with the name of Vital and the PRHIA logo in the foreground. The MCO's logo may be placed in the background and smaller than PRHIA's logo.

# Mandatory Requirements

- Header and Cover Page:
  - PRHIA's logo and MCO's logo
  - Vital logo
- Footer or back, as applicable:
  - MCO customer service contact numbers for providers and beneficiaries
  - internet address (website)

# Mandatory Requirements

## PRHIA's APPROVAL BEFORE DISTRIBUTION:

- Each MCO must send marketing materials by email to the Office of Compliance and Integrity to: [\*\*materialesmercadeovital@asespr.org\*\*](mailto:materialesmercadeovital@asespr.org)
- The time of review for each marketing material will be fifteen (15) working days. MCOs may not re-submit the same material previously denied by the PRHIA to different PRHIA personnel who did not work on the original submission.
- Approved marketing material will have an authorization number provided by PRHIA that must be placed in the lower or back part of each promotional material in a font size no smaller than 8.
- **Without said authorization number, the marketing material may not be published and/or distributed.**

# PROHIBIT MARKETING ACTIVITIES

- The PRHIA does not permit the performance of any sales activities, presentations or distribution of marketing materials in any **Puerto Rico Government Agencies, Public Corporations** or **other government facilities**.
- PRHIA does not allow any MCO to perform marketing activities within one (1) mile of a Puerto Rico Medicaid Office.

# PROHIBIT MARKETING ACTIVITIES

- MCOs are prohibited from conducting sales activities, presentations, and distributing and/or soliciting beneficiaries at least 100 feet of areas where individuals primarily receive health care services or are waiting to receive health care services.
- The prohibition against conducting marketing activities in health care settings extends to activities planned in health care settings outside of normal business hours. This prohibition is not intended to limit health care providers from engaging in independent discussions with beneficiaries should a beneficiary seek advice.



# PROHIBIT MARKETING ACTIVITIES

- Appointments with beneficiaries residing in long-term care facilities (including nursing homes, assisted living facilities, board and care homes, etc.) are only permitted upon request by the beneficiary.

# PROHIBIT MARKETING ACTIVITIES

- Contracted providers or facilities may be used to distribute marketing materials as long as the provider or facility distributes or makes available marketing materials for all plans in which the provider or facility participates.
- Marketing materials may only be distributed to individuals who meet criteria for enrollment.

# PROHIBIT MARKETING ACTIVITIES

- Directly or indirectly engaging in door-to-door, telephone, email, texting or other cold-call marketing activities.
- Offering any favors, inducements or gifts, promotions, or other insurance products that are designed to induce enrollment in the MCO's Plan.
- Offering of gifts, promotions, or token items that are not designed to induce enrollment in the MCO's Plan can be use however it could not exceed fifteen dollars (\$15) or less per Enrollees and no more than seventy-five dollars (\$75) in the aggregate annually per Enrollee, if prior approved in writing by ASES.
- Distributing plans and materials that contain statements that PRHIA determines are inaccurate, false, or misleading. Statements considered false or misleading include, but are not limited to, any assertion or statement (whether written or oral) that the MCO's plan is endorsed by the Federal Government or the Government of Puerto Rico, or similar entity.

# PROHIBIT MARKETING ACTIVITIES

- Distributing materials that, according to PRHIA, mislead or falsely describe the MCO's Provider Network, the participation or availability of Network Providers, the qualifications and skills of Network Providers (including their bilingual skills); or the hours and location of network services.
- Seeking to influence Enrollment in conjunction with the sale or offering of any private insurance.
- Asserting or stating in writing or verbally that the enrollee or potential must enroll in the MCO's plan to obtain or retain benefits.

# PROHIBIT MARKETING ACTIVITIES

- No MCO, its representative, or health care provider, will allow, make, issue or circulate in any way, marketing materials that are a false representation, false statement, misleading or incomplete comparison in relation to the terms, benefits, services or advantages of affiliation with to a certain MCO.
- No MCO, its representative, or health care provider, will allow any false representation or incomplete or fraudulent comparison of benefits and products to induce or knowingly intent to induce, or tend to induce, the beneficiaries of Government Health Plan to encourage the affiliation or disaffiliation with an MCO.

# PROHIBIT MARKETING ACTIVITIES

- No MCO, its representative, or health service provider shall incur in, or allow any method of marketing that has the effect of or tendency to induce membership with an MCO through force, fear, threat (whether explicit or implied), or undue pressure for membership or recommend disaffiliation from other MCO.

# PROHIBIT MARKETING ACTIVITIES

- Comparative or superlative terms such as: "better, superior, supreme, great, terrific, and words with similar meanings shall not be used in advertisements addressed to the beneficiaries of the Government Health Plan. Such statements or declarations may imply that the benefits and services of the MCO are better than those of another MCO. The promotion can be considered an unfair or incomplete comparison.
- No MCO or its representative may request, or require in any way, from any of their health service providers to pay or contribute to carry out the MCO's marketing strategies



# Educational Materials

Health education written materials must complement face-to-face education interventions and patient centered health promotion strategies. MCOs must avoid using written or graphic content that may cause copyright infringement. Information related to mental health diagnoses must comply with current Diagnostic and Statistical Manual of Mental Disorders (DSM) standards. PRHIA reserves the right to audit health education materials (including PowerPoint presentations)

*Educational materials may not:*

- Do not portray appropriately Vital or PRHIA logos in terms of collocation, coloring, size, etc. as stated in the marketing guidelines.
- Contain grammatical errors.
- Fail to include proper understandability and or actionability elements.

# Educational Materials

Understandability:

Content:

- The material makes its purpose completely evident.
- The material does not include information or content that distracts from its purpose.
- Educational material must not contain comparative or superlative terms and cannot be used to promote the MCO.

# Educational Materials

Understandability:

Content:

Word Choice & Style:

- The material uses common, everyday language.
- Medical terms are used only to familiarize audience with the terms. Medical terms should be defined when used.

## Educational Materials

- The material uses the active voice.

### Use of Numbers:

- Numbers appearing in the material are clear and easy to understand.
- The material does not expect the user to perform calculations.

# Educational Materials

## Organization:

- The material breaks or “chunks” information into short sections.
- The material’s sections have informative headers.
- The material presents information in a logical sequence.
- The material provides a summary.

# Educational Materials

## Layout & Design

- The material uses visual cues (e.g., arrows, boxes, bullets, bold, larger font, highlighting) to draw attention to key points.

## Use of Visual Aids

- The material uses visual aids whenever they could make content more easily understood (e.g., illustration of healthy portion size).
- The material's visual aids reinforce rather than distract from the content.
- The material's visual aids have clear titles or captions.
- The material uses illustrations and photographs that are clear and uncluttered.
- The material uses simple tables with short and clear row and column headings.

# Educational Materials

## Actionability

- The material clearly identifies at least one action the user can take.
- The material addresses the user directly when describing actions.
- The material breaks down any action into manageable, explicit steps.
- The material provides a tangible tool (e.g., menu planners, checklists) whenever it could help the user take action.
- The material provides simple instructions or examples of how to perform calculations.
- The material explains how to use the charts, graphs, tables, or diagrams to take actions.
- The material uses visual aids whenever they could make it easier to act on the instructions.