

POLICY AND PROCEDURE

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| POLICY NAME: Allowable Marketing Activities | POLICY ID: LA.MRKT.04 |
| BUSINESS UNIT: LHCC | FUNCTIONAL AREA: Marketing |
| EFFECTIVE DATE: 1/12, 2/15 | PRODUCT(S): Medicaid |
| REVIEWED/REVISED DATE: 10/13, 9/14, 2/15, 8/15, 8/16, 4/17, 4/18, 2/19, 2/20, 11/20, 2/22, 12/22 | |
| REGULATOR MOST RECENT APPROVAL DATE(S): n/a | |

POLICY STATEMENT:

Louisiana Healthcare Connections (Plan or MCO)

PURPOSE:

The purpose of this policy is to clearly define allowable marketing activities.

SCOPE:

This policy applies to all directors, officers, and employees of Centene Corporation, its affiliates, health plans, and subsidiary companies (collectively, the "Company").

DEFINITIONS:

POLICY:

2.14.3.1 The Contractor ~~12.4.1. The MCO~~ and its subcontractors shall be permitted to perform the following activities:

2.14.3.1.1 ~~12.4.1.1~~ Distribute general information through mass media (i.e. newspapers, magazines and other periodicals, radio, television, the Internet, public transportation advertising, billboards and other media outlets) in keeping with prohibitions to placement as detailed in the ~~Medicaid MCO eContract~~;

2.14.3.1.2 ~~12.4.1.2~~ Make telephone calls and home visits only to members currently enrolled in the MCO (~~Enrollee education member education~~ and outreach) for the purpose of educating them about services offered by or available through the MCO;

2.14.3.1.3 ~~12.4.1.3~~ Respond to verbal or written requests for information made by Potential Enrollees, in compliance with the response plan outlined in the Marketing and Enrollee Education Plan (see MCO Manual), potential members, in keeping with the response plan outlined in the marketing plan approved by LDH prior to response;

2.14.3.1.4 ~~12.4.1.4~~ Provide promotional giveaways that exceed the \$15.00 value to current members only;

2.14.3.1.5 ~~12.4.1.5~~ Attend or organize activities that benefit the entire community such as health fairs or other health education and promotion activities. Notification to LDH must be made of the activity and details must be provided about the planned marketing activities ~~using the Event Submission Calendar~~;

2.14.3.1.6 ~~12.4.1.6~~ Attend activities at a business at the invitation of the entity. Notification to LDH must be made of the activity and details must be provided about the planned marketing activities ~~using the Event Submission Calendar~~;

2.14.3.1.7 ~~12.4.1.7~~ Conduct telephone marketing only during incoming calls from ~~potential~~ Potential membersEnrollees. The ~~MCO-Contractor~~ may return telephone calls to ~~potential~~ Potential membersEnrollees only when requested to do so by the caller. The ~~MCO-Contractor shall~~ must utilize the response plan outline in the Marketing and Member Education Companion Guide, approved by LDH in writing, marketing plan, approved by LDH, during these calls; and

~~2.14.3.1.8~~~~2.14.4.1.8~~. Send plan-specific materials to potential members at the ~~P~~potential ~~member's~~ Enrollee's request.

~~2.14.3.2~~~~2.14.4.2~~. In any instance where an MCO-allowable activity conflicts with a prohibited activity, the prohibited activity guidance shall ~~be followed~~prevail.

PROCEDURE:

1. Any report of violating the rules listed in the policy above will coordinated with:
 - a. Plan Compliance Officer
 - b. Corporate Director, Marketing/Communications
2. The report of nonconformance is investigated.
3. The investigation is documented and retained in ~~Compliance 360~~Archer.

REFERENCES: Louisiana Medicaid Contract Statement of Work Section 2.14.3

ATTACHMENTS:

ROLES & RESPONSIBILITIES:

REGULATORY REPORTING REQUIREMENTS:

Which regulator(s) require reporting, what should be reported, when to report, and how to report/who to contact.

REVISION LOG

| REVISION TYPE | REVISION SUMMARY | DATE APPROVED & PUBLISHED |
|---------------------|---|---------------------------|
| New Policy Document | New Policy for 2023 Readiness Review | 02/28/22 |
| Annual Review | Updated procedure from "Compliance 360" to "Archer" Revised to align with updated Contract language Reformatted to latest Policy Template | 01/10/23 |
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POLICY AND PROCEDURE APPROVAL

The electronic approval retained in RSA Archer, the Company's P&P management software, is considered equivalent to a signature.

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