



2020 Kentucky Medicaid

# Marketing Plan

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## I. Introduction

Passport Health Plan (Passport) currently administers health care benefits for Kentucky Medicaid members in 120 counties across the Commonwealth.

Our goal is to increase brand awareness and promote a positive image of Passport. By focusing on these two areas we believe we will increase the number of enrolled individuals who select Passport as their Managed Care Organization.

## II. Marketing Focus

Passport's Marketing Plan focuses on brand awareness, new member recruitment and member retention (via brand loyalty). We believe clarity and careful messaging is very important and do this by:

- 1. Tailoring our messages to local audiences.** Using advanced business intelligence, we will design our advertising and messaging to fit the customs, landmarks, and culture of various regions and groups. We will provide marketing materials in English, Spanish, and each prevalent non-English language.
- 2. Building brand loyalty and empowering members.** We will give members tools and information to empower them to feel good about choosing Passport as their MCO.
- 3. Aligning brand recognition messages with our mission, vision, and values.** As a Kentucky-based nonprofit organization, our mission, vision and values are the foundation for everything we do and guideposts for our service model. Brand recognition efforts will reflect this homegrown commitment to the Commonwealth and our members.

## III. Messaging, Taglines and Themes

In 2020, Passport will continue to use messaging, taglines, and themes for the statewide population that reflects our brand and commitment to provide access to the care that our members need.

## IV. Marketing Strategies

The Passport Marketing Plan is based on the following strategies:

- Reinforce Passport mission, vision, values and purpose.
- Have a presence in markets across Kentucky.
- Emphasize Passport's presence in and contributions to the local communities.
- Employ messaging and images that are culturally appropriate for all populations.

## V. Marketing Tactics

Each of our strategies will be the focus of our marketing tactics, which include:

- A statewide media campaign
- Digital marketing
- Sponsorship of community events
- Support of local health agencies
- Cause related marketing

### Media Plan

Passport invests in a targeted media campaign with the objective of improving brand awareness, reiterating our long-standing commitment to the Commonwealth, and culminating in a call to action. The media plan consists of, but is not be limited to, the following elements throughout the service area:

- Print and Digital Media Placements
- Television/Radio
- Outdoor Print
- Mass Transit

### Targeted Events and Sponsorships

We emphasize our community engagement and compound the effect of our brand building, by hosting or participating in local health fairs, community-sponsored events, and collaboration with various organizations.

## VI. Marketing Compliance

### Marketing Rules

In accordance with section 26.2 of the contract between Passport and Department of Medicaid Services (DMS), Passport is required to submit any marketing plans and all marketing materials related to the managed care program to the Department for Medicaid Services (Department) and shall obtain the written approval of the Department prior to implementing any marketing plan or arranging for the distribution of any marketing materials to potential enrollees.

Passport will abide by the requirements of 42 CFR 438.104 in its activities. Our Marketing and Community Engagement department has procedures for the development, approval, and fulfillment of all advertising and brand recognition efforts, to include those efforts conducted on our behalf or through our subcontractors. In addition to those procedures, we have a Marketing Creative Services Manager and a Marketing Controller who maintain oversight over marketing approvals.

Passport will obtain written approval from DMS for marketing materials referring to Passport or DMS, prior to dissemination.

In developing marketing materials such as written brochures, fact sheets, talking points and posters, Passport abides by the following rules:

- A. No marketing materials shall be disseminated through the Contractor's Provider network. If the supplies branded health education materials to its Provider network, distribution shall be limited to the Contractors' Members and not be available to those visiting the Provider's facility. Such branded health education materials shall not provide enrollment or disenrollment information.
- B. No fraudulent, misleading, or misrepresentative information shall be used in the marketing materials;
- C. No offers of material or financial gain shall be made to Members as an inducement to select a particular provider or use a product;
- D. No offers of material or financial gain shall be made to any person for the purpose of soliciting, referring or otherwise facilitating the enrollment of any enrollee;
- E. No direct or indirect door-to-door, telephone, e-mail, texting or other cold-call marketing activities;
- F. All marketing materials comply with information requirements of 42 CFR 438.10;
- G. No materials shall contain any assertion or statement (whether written or oral) that CMS, the federal government, the Commonwealth, or any other similar entity endorses Passport.

Passport understands that the following are inappropriate marketing activities, and will not engage in such activities:

- A. Provide cash to Members or potential Members, except for stipends, in an amount approved by the Department and reimbursement of expenses provided to Members for participation on committees or advisory groups;
- B. Provide gifts or incentives to Members or potential Members unless such gifts or incentives:
  - 1. Are also provided to the general public
  - 2. Do not exceed ten dollars per individual gift or incentive
  - 3. Have been pre-approved by DMS
- C. Provide gifts or incentives to Members unless such gifts or incentives:
  - 1. Are provided conditionally based on the Member receiving preventive care
  - 2. Are not in the form of cash or an instrument that may be converted to cash
  - 3. Have been pre-approved by DMS
- D. Seek to influence a potential Member's enrollment with Passport in conjunction with the sale of any other insurance
- E. Induces providers or employees to DMS to reveal confidential information regarding Members or otherwise use such confidential information in a fraudulent manner
- F. Threaten, coerce or make untruthful or misleading statements to potential Members or Members regarding the merits of enrollment with Passport or any other plan
- G. Market against a specifically named competing MCO or support negative campaigns against competing MCOs.

Marketing and Community Engagement staff are trained twice a year at a minimum on these guidelines.

### Marketing Grievances

If a person or organization has a complaint or grievance regarding the marketing practices of Passport, the person or organization should submit the information to the Passport Marketing Controller (see address below). The written information should include a description of the suggestion or the facts of the issue. The Marketing Controller will acknowledge the suggestion, complaint or grievance within ten (10) calendar days of receipt. Passport will review the suggestion, complaint or grievance and notify you of its comment or determination in writing within thirty (30) calendar days of receipt.

Attn. Marketing Controller  
Passport Health Plan  
5100 Commerce Crossings Drive  
Louisville, Kentucky 40299  
[marketingcontroller@passporthealthplan.com](mailto:marketingcontroller@passporthealthplan.com)  
(502)566-7802

This information can be found on the Passport website at <http://passporthealthplan.com/compliance/> under the “Contact Us” section.

### Communications Review Process

Passport has established and will at all times maintain a system of control over the content, form, and method of dissemination of its marketing and information materials. Our marketing department maintains a structured and specialized process for ensuring approval of all advertising and brand recognition efforts and materials.

1. Passport staff submit all member material requests and all requests for mass communications (defined as communications to more than one individual) to the communications team via a project request form.
2. Each request is assigned to a project lead, who has the responsibility of evaluating all advertising and brand recognition materials to ensure the product will be published in a manner that is appropriate and meets all standards.
3. The communications team takes the following into consideration:
  - Health Literacy Standards – both written and visual
  - Intent and Tone – screens for the use of any potentially misleading, misrepresentative, or fraudulent information
  - Information about Passport – ensures Passport and its benefits and services are accurately explained and described to members
  - Source of the information

4. The Marketing team then uses a hierarchy of internal approvals for every communication, to include final approval by the Marketing Controller. This ensures that content is accurate, aligned with corporate goals, and meets all State and Federal requirements ensuring that no materials are fraudulent, misleading or misrepresentative.
5. After going through the internal review process, member advertising, marketing plans, brand recognition materials and health information materials are then submitted to the DMS for approval. If DMS has any changes, our Marketing Department works quickly with the originating department to make and re-submit changes to DMS for final approval.
6. Once final approval is received from the State, Passport assigns an internal approval number on the item and annotates it on the DMS Master Grid. This is an internal grid that is utilized to track DMS-approved member advertising, marketing plans, and brand recognition materials. Additionally, Passport maintains a record of all materials.

Marketing campaigns are coordinated through the Marketing Department and approved by Compliance and Executive Leadership prior to distribution.

Once a marketing campaign is approved the VP, Chief Marketing and Communications Officer; VP, Chief of Compliance; Director of Marketing; and Marketing Controller are responsible for monitoring the campaign to ensure compliance with State and Federal marketing rules.

## **VII. Closing**

During the past 20 years, Passport has gained extensive experience working collaboratively with State regulators. Our communications team is comprised of specialized, in-house writers and designers. Using best practices developed over years of experience working closely with Kentucky Medicaid member population, they have won numerous awards for health literacy and creative design.

As mentioned above, we will maintain our Marketing Focus on brand awareness, new member recruitment and member retention by utilizing specific Marketing Strategies. In addition, we will continue to work hard to ensure we maintain Marketing Compliance.