C.15. Marketing

a. Provide a summary of the Vendor’s marketing and distribution plan, describing the following at a minimum:

i. The system of control over the content and form of all marketing materials.

ii. The methods and procedures to log and resolve marketing Grievances.

iii. The verification and tracking process to ensure marketing materials and activities have been approved by the Department and adhere as required by Section 25.1 “Marketing Activities” and Section 4.4 “Approval of Department” for the Vendor and its Subcontractors.

b. Describe the Vendor’s understanding of the populations in the Commonwealth and define how it will adapt its marketing materials to reach the various populations and audiences.

Passport Highlights: Marketing

<table>
<thead>
<tr>
<th>How We’re Different</th>
<th>Why It Matters</th>
<th>Proof</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passport uses local scenery, actors, and location, and tailors branding and messaging to Kentucky’s unique population.</td>
<td>Engages members to better comprehend complex information and increases likelihood of members taking positive action to improve their health and quality of life</td>
<td>Passport has received multiple marketing and communications awards for these efforts, including the 2019 national Gold Aster Award for our social media campaign #FacesOfPassport.</td>
</tr>
<tr>
<td>We partner with community organizations to address health issues in local communities that are high priority for Department for Medicaid Services (DMS).</td>
<td>Allows us to facilitate education and awareness of Passport’s many programs and resources, as well as help improve health and reduce medical costs in the community, working collaboratively with our community partners</td>
<td>• In 2018 and 2019, we participated in an annual (average of 700) Kentucky community events. • Passport’s participation in Operation Bobcat: Innovative Readiness Training (IRT) provided over $1 million of free medical services to over 2,600 of our neighbors in four (4) counties in Eastern Kentucky.</td>
</tr>
<tr>
<td>Passport is the only current Kentucky Medicaid managed care organization (MCO) to have a dedicated Marketing Controller overseeing the marketing process.</td>
<td>Ensures that key staff monitor and adhere to state and federal laws, contractual provisions and DMS guidance regarding marketing rules and activities</td>
<td>Since this position and policy were implemented five (5) years ago, Passport has not received any marketing grievances.</td>
</tr>
</tbody>
</table>
Introduction

As a local organization with a long history of serving Kentuckians, Passport’s approach to marketing is firmly rooted in the belief that all advertising, communications and outreach to our membership and to the Kentucky Medicaid population must be tailored to the unique needs of that audience in its diverse communities.

Further, Passport’s Brand Strategy is best captured in the phrase “Better Health Together” because it reflects our fundamental belief that the best health outcomes result when Passport, members, providers, the Commonwealth and community advocates all work collaboratively to identify and deliver the services and support needed in each unique circumstance. Our creative message is based on research in the local community, where we discovered that Passport’s unique selling proposition is in our commitment to taking the time to care. Kentucky Medicaid members may be struggling financially, physically and emotionally, and they deserve to be treated with respect and empathy regardless of their situation. Passport is here for our members in good times and in bad. Simply stated in our tagline, “We do life together.”

Passport’s Community Engagement, Communications and Marketing, and Care Coordination teams work together collaboratively throughout the year to identify, develop and distribute compliant marketing and outreach materials to Kentucky Medicaid’s diverse populations. Local community relationships are key in helping us understand and address the health needs and Social Determinants of Health for our members across the Commonwealth.

C.15.a. Provide a summary of the Vendor’s marketing and distribution plan.

Passport’s marketing strategy is to promote the benefits offered through Kentucky Medicaid, educate members about the importance of preventive health care and screenings, and portray a positive image of Passport as a Medicaid MCO. Recognizing that referrals and word-of-mouth are the top factors in choosing a Medicaid MCO, Passport marketing delivers membership growth primarily by building brand awareness and member loyalty. Passport’s Community Engagement team is also a key part of our marketing strategy through its efforts to recruit new members and assist/retain current members.

Passport uses messaging, taglines and themes for the statewide population that reflect our brand promise and commitment to service and access to the care that our members need. These marketing initiatives support DMS goals to ensure access to and improve delivery of high quality, cost-effective health care services. We use DMS approved advertising and brand recognition materials designed to help current and prospective members make informed decisions about their coverage and health services. All costs incurred for the development and distribution of materials, including mailings and labor, are the Plan’s responsibility.

For cost-efficiency and maximum effectiveness, Passport’s internal Kentucky-based communications team develops all advertising and external communications. This team includes talented and dedicated writers, designers and marketing professionals who specialize in health literacy and brand recognition. The team consistently produces award-winning campaigns and communications. A partial listing of awards won in just the last four (4) years is shown in Exhibit C.15-1.
### Exhibit C.15-1: Highlight of Passport Award-Winning Campaigns and Communications

<table>
<thead>
<tr>
<th>Aster Awards</th>
<th>National Health Information Awards</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2019 Gold Award</strong>&lt;br&gt;#FacesOfPassport Social Media Campaign</td>
<td><strong>2019 Silver Award</strong>&lt;br&gt;Digital Health Award—New Member Video “Choosing a PCP”</td>
</tr>
<tr>
<td><strong>2018 Gold Award</strong>&lt;br&gt;Children’s Resiliency and Activity Book</td>
<td><strong>2019 Bronze Award</strong>&lt;br&gt;Digital Health Award—New Member Video “Earn Rewards”</td>
</tr>
<tr>
<td><strong>2018 Silver Award</strong>&lt;br&gt;Educational Video Series</td>
<td><strong>2018 Silver Award</strong>&lt;br&gt;Children’s Resiliency Coloring and Activity Book</td>
</tr>
<tr>
<td><strong>2018 Silver Award</strong>&lt;br&gt;Passport’s Instagram Series</td>
<td><strong>2018 Silver Award</strong>&lt;br&gt;MyHealthMyLife Issue #1 2018</td>
</tr>
<tr>
<td><strong>2017 Gold Award</strong>&lt;br&gt;Entry Name: Multilingual Advertising Campaign&lt;br&gt;Category: Multilingual Advertising Series</td>
<td><strong>2018 Merit Award</strong>&lt;br&gt;Groundbreaking Change: Building Healthier Communities</td>
</tr>
<tr>
<td><strong>2017 Silver Award</strong>&lt;br&gt;Entry Name: Diabetes Care Book—Just for Teens&lt;br&gt;Category: Patient Education-Single</td>
<td><strong>2017 Merit Award</strong>&lt;br&gt;Entry Name: Together TV Series&lt;br&gt;Class: Consumer Decision Making&lt;br&gt;Category: TV Ad</td>
</tr>
<tr>
<td><strong>2015 Gold Award and Best of Category</strong>&lt;br&gt;Entry Name: I Choose Passport Spanish Radio Script&lt;br&gt;Category: Multilingual Advertising—Single Entry</td>
<td><strong>2017 Merit Award</strong>&lt;br&gt;Entry Name: Diabetes Teen Book&lt;br&gt;Class: Patient Education Information&lt;br&gt;Category: Booklet/Brochure/Pamphlet</td>
</tr>
<tr>
<td><strong>2015 Gold Award</strong>&lt;br&gt;Entry Name: Keys to a Healthy Heart&lt;br&gt;Category: Service Line—Cardiac/Vascular</td>
<td><strong>2016 Silver Award</strong>&lt;br&gt;Entry Name: Let’s Eat Healthy&lt;br&gt;Class: Patient Education Information&lt;br&gt;Category: Booklet/Brochure/Pamphlet</td>
</tr>
<tr>
<td><strong>2015 Silver Award</strong>&lt;br&gt;Entry Name: Weekly Facebook Series&lt;br&gt;Category: Social Media Campaign</td>
<td><strong>2016 Bronze Award</strong>&lt;br&gt;Entry Name: The New Drink Pyramid&lt;br&gt;Class: Health Promotion/Disease and Injury Prevention Information&lt;br&gt;Category: Video</td>
</tr>
<tr>
<td><strong>2015 Silver Award</strong>&lt;br&gt;Entry Name: 2014 Annual Report&lt;br&gt;Category: Annual Report</td>
<td></td>
</tr>
</tbody>
</table>
### Aster Awards

<table>
<thead>
<tr>
<th>National Health Information Awards</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2016 Bronze Award</strong>&lt;br&gt;Entry Name: How to Use Nicotine Fading&lt;br&gt;Class: Health Promotion/Disease and Injury Prevention Information&lt;br&gt;Category: Booklet/Brochure/Pamphlet</td>
</tr>
<tr>
<td><strong>2016 Merit Award</strong>&lt;br&gt;Entry Name: MyHealthMyLife Issue #3 2015&lt;br&gt;Class: Patient Education Information&lt;br&gt;Category: Newsletter</td>
</tr>
<tr>
<td><strong>2015 Merit Award</strong>&lt;br&gt;Entry Name: Caring for you 365 days a year&lt;br&gt;Class: Health Promotion/Disease and Injury Prevention Information&lt;br&gt;Category: Calendar</td>
</tr>
</tbody>
</table>

A high-level overview of Passport’s communications distribution methods is included in Exhibit C.15-2. A complete copy of our 2020 Marketing Plan for Kentucky Medicaid is in Attachment C.15-1_2020 Marketing Plan.

**Exhibit C.15-2: Key Message of Passport Communication Distribution Methods**

<table>
<thead>
<tr>
<th>Advertising Method/Strategy</th>
<th>Key Messages and Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Broadcast Media</strong>&lt;br&gt;• Local and cable TV&lt;br&gt;• Local and public radio&lt;br&gt;<strong>Print</strong>&lt;br&gt;• Local, county newspapers&lt;br&gt;• Provider and professional publications&lt;br&gt;• Lifestyle magazines&lt;br&gt;• Flyers and brochures&lt;br&gt;<strong>Outdoor</strong>&lt;br&gt;• Mass transit ads, bus shelters, vehicle wraps&lt;br&gt;• Billboards and mobile billboards&lt;br&gt;• Signage at key Kentucky venues</td>
<td>• Build Passport brand awareness&lt;br&gt;• Ensure member retention and growth&lt;br&gt;• Promote Passport’s mission to improve the health and quality of life of our members&lt;br&gt;• Promote and improve access to health benefits</td>
</tr>
<tr>
<td><strong>Targeted Events and Sponsorships</strong>&lt;br&gt;with representation by Passport Community Engagement team</td>
<td>• Provide in-person access to Community Engagement representatives&lt;br&gt;• Build Passport brand awareness&lt;br&gt;• Collaborate with advocate agencies to ensure access to needed services</td>
</tr>
<tr>
<td><strong>Web/Social Media</strong>&lt;br&gt;• Facebook&lt;br&gt;• Twitter&lt;br&gt;• Pinterest&lt;br&gt;• Instagram</td>
<td>• Increase education for prevention and disease management&lt;br&gt;• Build Passport brand awareness&lt;br&gt;• Reinforce DMS messages through Facebook posts and retweets</td>
</tr>
</tbody>
</table>
To ensure our brand recognition messages are effectively received throughout Kentucky, we will use a variety of advertising vehicles and messaging, including the following.

**Mass Media: Television/Radio**
- Local and cable TV
- Local radio and public radio

Passport purchases media via local Kentucky-based agencies and adjusts its media mix on a continual basis, at minimum quarterly, to maximize the efficiency of our messaging. We have gained significant insight into which mass media channels are the most effective in reaching Kentucky Medicaid members.

As an example, over the last four (4) years, we have shifted a larger portion of our messaging into digital channels. With a targeted investment, we are able to reach multiple audiences through these targeted placements, allowing us to reach members, caregivers, advocates, providers and the business community.

**Digital Advertising**
- Passport advertises using the following digital methods:
  - Search engine marketing
  - Search engine optimization
  - Display ads
  - Facebook and Instagram ads

**Print and Outdoor**
- Mass transit ads
- Local and county newspapers ads
- Provider and professional publication ads
- Lifestyle magazine publication ads
- Bus shelters and interior cards on mass transit
- Vehicle wraps for mass transit
- Billboards
- Mobile billboards
• Gas station announcements
• Signage at key Kentucky venues

Targeted Events and Sponsorships

As a community-based health plan, Passport partners with local organizations and participates in community events where Kentucky Medicaid members live and work. Our participation is primarily motivated by our desire to facilitate education and awareness of the many programs and resources we make available (and those that are already available throughout the Commonwealth) to our members and the community at large. We also participate in or sponsor various programs that help improve health and access, and reduce medical costs in the community, working collaboratively with our community partners.

In 2018 and 2019, our staff participated in an annual average of seven hundred (700) Kentucky community events.

To encourage member participation, we post information about our upcoming involvement in community events on our website, advertise through flyers and collaborate with community partners to share via word of mouth.

Exhibit C.15-3 shows some of our most recent, impactful community outreach initiatives, which were chosen for their alignment with our goals to improve member health and reduce overall costs to Kentucky Medicaid.

Exhibit C.15-3: Passport Event and Program Sponsorship Examples

<table>
<thead>
<tr>
<th>Name of Program</th>
<th>Description and Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Back to School Rallies</td>
<td>Held throughout the Commonwealth, Passport has sponsored and participated in multiple rallies, which provide low-income children with free school supplies, resources and information.</td>
</tr>
<tr>
<td>Bluegrass Ventures Sponsorship</td>
<td>Passport provided food commodities, outreach and education, and live cooking and food preparations to the community in the downtown/Winburn area of Lexington.</td>
</tr>
<tr>
<td>Name of Program</td>
<td>Description and Outcome</td>
</tr>
<tr>
<td>-------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Childhood Obesity Prevention Action Team (COPAT)</strong></td>
<td>Passport conducted educational sessions and providing training and educational materials to assist this organization with addressing childhood obesity in schools across all counties in Western Kentucky in 2019.</td>
</tr>
<tr>
<td><strong>Community Baby Showers</strong></td>
<td>We participated in baby showers and provided health information to expecting mothers in all 120 counties.</td>
</tr>
<tr>
<td><strong>Double Dollars Program</strong></td>
<td>New for 2019, Passport sponsored a special program in Lexington and Louisville that allows Kentuckians receiving Supplemental Nutrition Assistance Program (SNAP) benefits the opportunity to double their dollars on fresh produce boxes at local farmers markets and other local retailers.</td>
</tr>
<tr>
<td><strong>Farmacy Program</strong></td>
<td>In collaboration with Mountain Comprehensive Care in Letcher County, Passport sponsored a special community initiative where Eastern Kentucky doctors can now write prescriptions for vegetables to their clients (including many Kentucky Medicaid members) with diet-related health conditions.</td>
</tr>
<tr>
<td><strong>Give a Kid a Smile</strong></td>
<td>Passport participated in Give a Kid a Smile, sponsored by Park DuValle Community Health Center and the American Dental Association, which provided free dental screenings for low-income families in west Louisville. In 2019, we began participating in a Free Dental Day with Shawnee Christian Healthcare Center and the American Dental Hygienists Association to provide dental screenings for children and adults.</td>
</tr>
</tbody>
</table>
| **Healthy Hoops® Kentucky and new program** | Healthy Hoops® Kentucky, a basketball-themed asthma awareness program sponsored by Passport, provided education and screenings to children between the ages of seven (7) and fourteen (14) years and their families. The program addressed how to manage asthma through the correct use of medication, managing triggers in the home, healthy eating and exercise. Passport sponsored Healthy Hoops® events in Louisville from 2008 through 2018. We chose to sponsor this program because of the prevalence of asthma in Kentucky for our members, particularly children. The Healthy Hoops Kentucky program approached asthma as a community issue. The program offered education and outreach in a variety of ways:  
  • Participation in local events throughout the year to provide program awareness.  
  • Community event for children ages seven (7) through fourteen (14) years and their parents. The event began with the asthmatic child and parent/guardian directed through a series of clinical stations. Families received lunch and children attended basketball sessions hosted by current and former professional and college basketball players.  
  • Parents and providers received screening information and were encouraged to develop an asthma action plan.  
Although the program was open to the community, approximately 85% of the children were participating Passport members. Since 2008, over 3,000 children received asthma education and screenings. |
<table>
<thead>
<tr>
<th>Name of Program</th>
<th>Description and Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operation Bobcat:</td>
<td>From June 15-23, 2018, Passport had the unique opportunity to participate in this initiative where no-cost medical clinics provided over $1 million of free medical services to over 2,600 of our neighbors in four (4) counties in Eastern Kentucky.</td>
</tr>
<tr>
<td>Innovative Readiness</td>
<td></td>
</tr>
<tr>
<td>Training (IRT)</td>
<td></td>
</tr>
<tr>
<td>Sound the Alarm</td>
<td>In 2018 and 2019, Passport staff volunteered to help the Red Cross install smoke alarms in more than 800 residential homes in three Kentucky cities, which were identified as being in the top 100 counties across the nation to continually see a high volume of residential house fires and deaths.</td>
</tr>
</tbody>
</table>

**Web/Social Media**

In addition to our website, passporthealthplan.com, Passport maintains a strong social media presence in Kentucky. In 2011, Passport was the first Medicaid MCO in Kentucky to establish a presence on Facebook (5,412 followers) and Twitter (1,493 followers), and we continue to be the only MCO with a social media presence dedicated exclusively to the needs and interests of Kentucky’s Medicaid population. Given the growing importance of social media and each channel’s ability to reach unique and distinct audiences, we have subsequently established a presence on YouTube (December 2011, 124 subscribers), LinkedIn (February 2012, 2,090 followers), Instagram (June 2013, 512 followers), and Pinterest (December 2014, sixty-three [63] followers).

Passport’s social media team actively manages the messaging plan for each channel, tailoring the content for each audience on a weekly basis, and, as a result, Passport’s social media following has grown every month for the past five (5) years.

The primary objectives of Passport’s social media strategy are to improve access to health care services, promote incentives for healthy behavior through our Passport Member Rewards Program, reinforce messages from DMS, and increase member engagement and retention. Without question, Passport’s most engaging social media posts are the true success stories that we share regularly on several of our channels. The member-centric situations described in these stories are often difficult to read; yet, the successful outcomes go a long way toward building the hope and trust that is necessary to engage the Medicaid population.
Several recent examples that illustrate Passport’s social media messaging are included in Exhibit C.15-4.

**Exhibit C.15-4: Passport’s Social Media Messaging Examples**

- **Passport Health Plan**
  - December 30, 2019
  - "In addition to visiting your PCP, health advice is just a phone call away. Nurses are here for you. They can give you answers that are easy to understand. You can call and talk with a nurse or listen to health topics any time of the day or night. To speak with a nurse, please call 1-800-365-0600."

- **Passport Health Plan**
  - September 16, 2019
  - "Do you know what to expect when you go to your PCP? Read more in our member handbook: [http://bit.ly/32wE0Kc]"

- **Passport Health Plan**
  - August 8, 2019
  - "You can help make sure your child is healthy and ready for the new school year by getting up-to-date on important checkups and vaccines! Make an appointment with your child’s primary care provider (PCP). At that appointment, ask the PCP if your child is due for any immunizations (shots) and for a current immunization record. Some schools may ask for a copy at registration."

- **Passport Health Plan**
  - September 16, 2019
  - "One of our Care Connectors recently took a call from an elderly Passport member (Patricia), who had questions about the gift cards she could earn for the medical services she had received.

  During their conversation, Patricia made it clear to our CC that when she was first diagnosed with COPD (pulmonary heart failure), she was very afraid and depressed, not knowing what she was going to do. A Passport Care Manager talked to her about the illness and what she could do ... See More"

- **Passport Health Plan**
  - July 15, 2019
  - "A Passport Care Manager met Henry in early August at his PCP office. Henry has many chronic illnesses including diabetes, chronic kidney disease, smoking, diabetes insipidus, and hepatitis. He could not access the care he needed due to having limited to no transportation. He had to cancel his kidney specialist appointments and cancel his surgery because he couldn’t afford to pay for the ride.

  Our Care Manager did some research and helped him get an old vehicle junked and ... See More"

- **Passport Health Plan**
  - October 16, 2019
  - "As a Passport Health Plan member, you can use your benefits to improve your health and well-being.

  **PASSPORT SUCCESS STORY**

  "... The materials she sent totally helped calm my fears. I am extremely satisfied with the services I receive from Passport and am never going anywhere else!"

  **PASSPORT SUCCESS STORY**

  "... I could feel the relief in his voice when I told him the news. If nothing would have been done this man would have continued to miss much needed care."
In 2018, Passport began using texting services for members to help communicate basic health and benefits information. Passport’s Marketing team collaborates with our Clinical and Quality teams to develop educational campaigns and, with permission from DMS, other social media platforms and new technologies specifically to address the health concerns of our members. Members may opt out of this texting service at any time.

As mentioned earlier, Passport’s Marketing Plan is updated on an ongoing basis, quarterly at a minimum. We measure and analyze the success of various advertising and brand recognition efforts by conducting primary consumer research, both quantitative (brand trackers) and qualitative (focus groups across Kentucky). Using this combined knowledge, we will alter our advertising and messaging strategies as needed to fit the characteristics, needs and desires of this population in an effort to reach as many members as possible.

**Surveys and Focus Groups**

Passport regularly conducts statewide surveys and in-person focus groups with Medicaid-eligible Kentuckians from across the Commonwealth to better understand the population’s needs and its awareness and impressions of companies like Passport and track the effectiveness of our marketing and branding campaigns.

C.15.a.i. The system of control over the content and form of all marketing materials.

Passport has a dedicated Marketing Controller who resides within the Marketing Department and is responsible for oversight of all Marketing and Community Engagement activities to ensure Passport continuously abides by both the DMS contract and Chapter 42 Code of Federal Regulation (CFR) Section 438.104. The Marketing Controller works with various departments to establish and at all times maintain a system of control over the content, form and method of dissemination of its marketing and information materials.

To ensure compliance with all marketing requirements, Passport has a mandatory review process for all mass communications, which includes all communications to and from more than one individual. Anyone who wants to have a communications piece created must submit an electronic project request form to the Marketing Department. All marketing and communication project requests are subsequently vetted through an electronic compliance tracking system by a marketing project coordinator. This electronic system is used from project inception through completion to ensure that all items are properly created, reviewed and internally approved prior to submission to DMS. At a minimum, the Marketing Controller and VP and Chief Compliance Officer review all projects, in addition to various subject matter experts from across the Plan. During the Marketing Controller’s review, a six-page document review checklist, located within the electronic tracking system, is run to ensure that all marketing rules are followed. The electronic system allows for a permanent record of the entire internal review process.

Following DMS submission, all projects are recorded on a tracking spreadsheet that is maintained by the Project Coordinator. Upon receipt of DMS approval of a communication, the item is given an internal approval number, and the spreadsheet is updated. The approval number is placed at the bottom of all
approved communications as a visual indicator that it has been approved. No document can be printed or disbursed without a visible approval number. Subcontractors who want to send materials to Passport members on Passport’s behalf are required to follow the same process.

Passport’s communications approval process is outlined in the flowchart in **Exhibit C.15-5**.

**Exhibit: C.15-5: Communications Approval Process**

![Communications Approval Process Flowchart]

*Marketing Project Coordinator*
An example of Passport’s Project Request Form is shown in Exhibit C.15-6.

Exhibit: C.15-6: Passport Project Request Form
Additionally, the Marketing Department maintains a media placement grid that lists the location of all Passport media items (e.g., billboards, bus shelters, ads), along with the item’s internal approval number. The Marketing Controller periodically performs random audits of the grid to ensure its accuracy and verify that all items have been approved by DMS. The Marketing Controller works collaboratively with the compliance team and serves on the compliance committee led by the Chief Compliance Officer.

Passport reports all marketing initiatives to DMS on a quarterly basis.

Passport’s Marketing Controller conducts mandatory training sessions for the Marketing and Community Engagement staff. Other applicable staff and providers are routinely trained on DMS marketing guidelines, as well as state and federal guidelines. Our 22 years of experience working with DMS has given us a depth of expertise and knowledge on when to proactively seek advice from DMS on marketing materials that might be questionable and to ensure we are remaining compliant with DMS marketing guidelines. We maintain several policies and communications manuals, and all associates are required to follow these guidelines and policies to ensure that Passport’s communications are consistent and compliant.

In addition, Passport tracks all events attended by our Community Engagement representatives. To ensure our activities in the field are compliant, management randomly monitors events and presentation activities.

Passport’s Marketing and Community Engagement department does not make any unsolicited outbound calls to potential members.

All incentives for members through our Passport Member Rewards Program are coordinated through the Marketing and Community Engagement department, which seeks the advice of the Marketing Controller and our Compliance department in determining whether proposed promotional items are appropriate. All promotional items are submitted for approval by DMS prior to distribution. All staff are trained and tested annually on rules related to protected health information (PHI) and marketing guidelines by the Marketing Controller. We ensure all member gift cards and value-added benefits meet the requirements of Social Security Act section 1128A, the Contract and all other applicable federal and state laws.

All marketing campaigns are coordinated through the Marketing and Community Engagement department and approved by Compliance and executive leadership prior to distribution. The Marketing Controller and the Compliance department are responsible for monitoring all marketing campaigns to ensure they follow marketing guidelines and use DMS-approved materials.
C.15.a.ii. The methods and procedures to log and resolve marketing grievances.

**Logging and Resolving Marketing Grievances**

Passport has a detailed process in place to log and resolve marketing grievances, which is submitted annually to DMS as part of our annual Marketing Plan. This policy and procedure has been in place for five (5) years, during which no grievances have been reported.

The process is as follows:

1. If a person or organization has a complaint or grievance regarding the marketing practices of Passport, the person or organization can submit the information to the Passport Marketing Controller using the following address, email address or phone number:

   Attn. Marketing Controller  
   Passport Health Plan  
   5100 Commerce Crossings Drive  
   Louisville, Kentucky 40299

   marketingcontroller@passporthealthplan.com  
   502.566.7802

   The information submitted should include a description of the suggestion or the facts of the issue. This information may also be submitted to our Member Services department.

2. Upon receipt, the Marketing Controller will acknowledge the suggestion, complaint or grievance within ten (10) calendar days of receipt.

3. The appropriate Passport staff will review the suggestion, complaint or grievance and notify the originator of its comment or determination in writing within thirty (30) calendar days of receipt.

   This information can be found on the Passport website at passporthealthplan.com/compliance/ under the Contact Us section.

   The Marketing Controller checks the marketing grievance email box daily and maintains a log to track all grievances.

C.15.a.iii. The verification and tracking process to ensure marketing materials and activities have been approved by the Department and adhere as required by Section 25.1 “Marketing Activities” and Section 4.4 “Approval of Department” for the Vendor and its Subcontractors.

   Passport has not received any marketing grievances since this policy and procedure was implemented five (5) years ago.

Passport has a strong culture of compliance and maintains policies that ensure marketing materials and activities adhere as required to Section 25.1 Marketing Activities, Section 25.2 “Marketing Rules,” and Section 4.4 Approval of Department. Also, as noted in the answer to Section A.1, Passport maintains a
rigorous oversight process to ensure compliance. Please refer to Exhibit C.15-5 for a flowchart of Passport’s step-by-step communications review process.

Passport utilizes a time-tested process of multiple checkpoints to ensure the use and distribution of DMS-approved marketing materials for our marketing/outreach efforts. Our marketing and compliance teams have been working closely with DMS for decades to produce quality marketing materials and activities that comply with marketing requirements, that do not repeat any mistakes previously noted by DMS, and that are updated based on any new policy or regulatory requirements.

Passport’s policy is to ensure that key staff within the Marketing and Community Engagement department monitor and adhere to state and federal laws, contractual provisions, and DMS guidance regarding marketing rules and activities. This includes following DMS guidance regarding the submission and distribution of member materials.

Our Marketing Controller:

- Reviews and monitors the DMS/Passport Health Plan Inc. contract, particularly sections specific to the submission and distribution of marketing materials.
- Discusses changes and updates to the DMS marketing guidance during regular meetings of the Advertising, Marketing, and Community Engagement teams.
- Collaborates with the Passport Compliance Officer as needed.
- Works with the advertising agency of record to ensure that the media placement grid accurately reflects all approved marketing materials and current placement.

Our Marketing team is responsible for:

- Ensuring that marketing materials have completed the internal approval process, as outlined in the answer to A.i.
- Ensuring that Passport’s chief compliance officer and marketing controller have reviewed and approved marketing materials prior to submission to DMS.
- Submitting all internally approved marketing materials to DMS via the SharePoint site.
- Submitting all internally approved print marketing materials to DMS using the Marketing Matrix format.
- Maintaining an internal DMS Master Grid.
- Ensuring that all DMS-approved marketing materials are assigned an approval number.
- Alerting the agency of record when marketing materials have been approved by DMS.

All previously approved items that undergo significant material changes will be resubmitted to DMS for official approval using the detailed process above, except items that did not require official approval, which will be resubmitted as an informational (i.e., courtesy) filing. In addition, Passport has a 360 feedback process to ensure all changes made by various reviewers in the internal approval process are approved by subject matter experts prior to incorporation.
C.15.b. Describe the Vendor’s understanding of the populations in the Commonwealth and define how it will adapt its marketing materials to reach the various populations and audiences.

**Member Marketing Material Research and Development**

Passport’s Communications and Marketing team has decades of experience researching Kentucky’s population and devising new and innovative ways to meet the evolving needs of our members. As described below, Passport uses various methods to understand the populations in the Commonwealth and continually adapt our marketing materials to reach Kentucky Medicaid’s various populations and audiences.

**Collaboration between internal teams:** Passport’s Community Engagement; Communications and Marketing; Equity, Diversity, and Inclusion (EDI); and Population Health Management teams all work together collaboratively throughout the year to identify, develop and distribute special program materials that are culturally sensitive to the appropriate Kentucky Medicaid populations. They identify the need for specific health-related and clinical information and develop materials for targeted populations based on demographics, diagnosis and claims.

For example, our EDI and Marketing teams work hand-in-hand with our Refugee Care Coordination program to develop and provide translated materials that may assist with **refugees’ unique needs** as they adjust to life and navigating health care in the U.S.

**Use of local talent and scenery:** One of the strategies Passport uses to reach and engage special populations across the Commonwealth is to hire local talent and employ the use of local scenery to help inspire trust and reassure members that we are a local plan committed to helping them improve their health and quality of life.

For example, our award-winning **New Member Videos** were created using local actors and were filmed at our headquarters in south Louisville.

**Use of local focus groups:** Passport holds focus groups in different parts of the Commonwealth to assess different geographies requiring specifically tailored communications. As a result, we provide marketing and communication materials in English, Spanish and each prevalent non-English language.

**Using data to meet needs of various Kentucky populations:** Our EDI team researches various Kentucky populations and analyzes public demographic and Passport-specific claims data to help the other teams better understand the specific needs of our membership as they are developing materials.

For example, every year this team analyzes reports from Passport’s language line, the Kentucky Department of Education, Jefferson County Public Schools (JCPS) and the Kentucky Office of Refugees to determine the top languages Passport should be addressing in our materials. The final decision is an amalgamation of each of these sources to reach the best results for our members. The top ten (10) languages for Passport in 2019 are identified in **Exhibit C.15-7**.
Exhibit C.15-7: Top Ten (10) Languages for Passport members in 2019

1. Spanish
2. Arabic
3. Somali
4. Nepali
5. Swahili
6. Kinyarwanda
7. French
8. Vietnamese
9. Karen
10. Mandarin Chinese

Our in-house Kentucky-based Communications and Marketing team reviews all materials and ensures that the appropriate departments and leaders review materials prior to DMS submission. They are constantly analyzing national best practices in the field that might apply to specific materials.

For example, through our experience with national marketing affiliations, we learned that reaching unique populations such as millennials requires more texting and positioning on less traditional social media outlets, such as Instagram and Pinterest.

Individual departments are typically responsible for helping determine the distribution method of their requested materials. However, our creative services team assists in the printing and fulfillment process.

Examples of Successful Marketing Materials for the Kentucky Medicaid Population

Here are several examples of Passport’s previous successes in adapting its marketing materials for various populations and audiences.

Award-Winning New Member Videos

In 2019, Passport implemented award-winning innovation efforts to meet the unique needs of newly enrolled members via digital and social media. Using local actors and filming in our Louisville headquarters, our in-house Marketing team crafted a series of five (5) New Member Videos as part of our new member experience strategy.

Our first video received positive results, with 3,815 views, an above-average click-through rate of 5.52% (the industry average is 1.8%), 286 reactions (likes/comments), and 29 shares. Since the 2019 launch of this series, the videos have received over 6,568 page views, with an average time on the page of one minute and 35 seconds.
In the fall of 2019, the New Member videos were awarded both a silver and bronze Digital Health Award for excellence in crafting high quality digital health media. **Exhibit C.15-8** shows a sample screenshot of one of these videos.

**Exhibit C.15-8: Sample Screenshots of Passport New Member Videos**

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**Award-Winning Multicultural Campaign**

Passport has been successful in reaching underserved, multicultural populations, like the significant, growing refugee population in the Greater Louisville area. Advertising was developed in 2016 to target key cultural populations in languages not usually seen in the marketplace, like Arabic, Nepali and Swahili. These multicultural ads, shown in **Exhibit C.15-9**, were designed to drive basic awareness of Passport and Medicaid. The ads were strategically placed in locations and neighborhoods known for concentrations of these refugee populations, as identified by Passport’s EDI team. The ad campaign, in total, was nationally recognized in 2017 with a Gold Aster Award.

**Exhibit C.15-9: Passport Multicultural Advertisements**
2013 Statewide Expansion Marketing Campaign

In 2013, when Passport began serving Kentucky Medicaid members on a statewide basis, we made sure all of our billboards and advertisements reflected the various cultures of people from across the Commonwealth. We researched the demographics of the newly eligible Expanded population and developed images, taglines, and other marketing tactics specifically to reach and engage with them. We engaged the Expanded population by advertising in certain publications that cater to their demographics like Leo Weekly magazine and the Louisville Independent Business Administration.

For example, our research into the “young invincible” Expanded population led us to create a unique print advertising campaign designed to catch the eyes of younger working Kentuckians through a comic illustration format. We used real Kentucky talent that reflected the demographics of this population. As a result of targeted marketing efforts like this, Passport now holds a nearly 25% membership share of Kentucky Medicaid members. See Exhibit C.15-10 for several examples of our advertising developed specifically to address Kentucky Medicaid Expanded populations.
Exhibit C.15-10: Sample 2013 Targeted Expanded Medicaid Membership Advertising
Spanish Food Chart for Children

Our clinical teams recently developed a food chart for children five (5) through eight (8) years of age to encourage healthy eating. To meet the needs of our Hispanic population, we translated this into Spanish and added different pictures of foods that are more frequently eaten by Hispanic families. See Exhibit C.15-11 to view this food chart.

Exhibit C.15-11: Spanish Food Chart for Hispanic Children

Mi Plato
Alimentación saludable para niños de 2 a 3 años

¿Cuánto debo comer CADA DÍA?
Verduras: 1½ tazas
Frutas: 1 taza
Leche: 2 tazas
Carne y frijoles: 3 onzas
Granos: 4 onzas
Fotonovela for Pregnant Hispanic Members

In 2013, Passport developed a unique storytelling tool called a Fotonovela to help our Hispanic populations understand how our Mommy Steps high-risk pregnancy program works. A Fotonovela is a small pamphlet (similar to a graphic novel) that uses photographs instead of animations and is popular in Latin American countries and among American Hispanic populations. This innovative format has been used for educational purposes by national health organizations such as the National Diabetes Education Program.

For Passport’s Fotonovela, we used actual photographs of our bilingual member service representatives and bilingual Mommy Steps nurse located here in Kentucky. See Exhibit C.15-12 to view several pages from this Fotonovela.

Exhibit C.15-12: Sample from Fotonovela for Hispanic Pregnant Women

Cómo obtener apoyo del programa Mommy Steps durante mi embarazo

<table>
<thead>
<tr>
<th>Protagonistas:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gabriela</td>
</tr>
<tr>
<td>Una mujer de 25 años que se acaba de enterar de que está embarazada.</td>
</tr>
<tr>
<td>Rosa</td>
</tr>
<tr>
<td>Una mujer de 24 años, amiga de Gabriela.</td>
</tr>
<tr>
<td>Maria</td>
</tr>
<tr>
<td>Enfermera del programa Mommy Steps de Passport.</td>
</tr>
</tbody>
</table>
Video Addressing the Right to Language Access

In 2018, to disseminate information about Section 1557 of the Affordable Care Act (the Right to Language Access), our EDI and Marketing teams created a video in collaboration with the Center for Accessible Living. We added subtitles so that the deaf community could read and receive this important information on the internet.
Conclusion

Through our traditional and nontraditional marketing efforts, we seek to reinforce the Passport mission to improve the health and quality of life of our members across the Commonwealth. We strive to position Passport as a reliable Medicaid health plan that takes the time to care and is there when you need us. We let our members and providers know that we are better together when we collaborate and strive to find innovative solutions that will improve the health and quality of life of our members and all Kentuckians while reducing health care costs.

*Passport has been honored to serve the Kentucky Medicaid and foster care populations for 22 years and will continue to comply with all provisions of the Medicaid Managed Care Contract and Appendices (including Kentucky SKY) as we continue to serve them in the future.*