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Marketing Materials		
Document		

Compliance Document

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Shared Health

Applies to: Shared Health

Audience: Marketing Team Members

Purpose: To manage and provide a system for creating, updating, tracking and distributing marketing materials for members to safeguard sufficient access to benefits and services in a timely and accurate manner. This process follows a task list that goes through multiple states of review, including appropriate legal and compliance reviews to ensure materials meet regulation and brand standards.

Procedure: Shared Health Marketing team members shall coordinate the annual update(s) and creation of marketing and communication materials. This will comprise provider, broker, sales, member and regulatory documents. These materials contain important information and include but aren't limited to Evidence of Coverage (EOCs), Annual Notice of Changes (ANOCs), Provider and Pharmacy Directories, ID Cards and designated benefit/enrollment letters.

Below is the procedure for both required and general plan information. Materials are generated from a master materials list that is monitored and updated weekly.

Member, Sales and Regulatory Marketing and Communication Materials

Procedure		Steps	Responsibility
1.	Identify material schedules for updates according to materials list or business owner material request.	Materials are monitored according to a master materials list. This list is tracked and updated weekly to ensure all materials are monitored and prioritized by their start and end dates. Business owners may also send in material requests for new materials or off-schedule updates to be added to existing materials.	Marketing Team member Business Analyst
2.	Open project for initial team review.	SH Marketing Team member will open a project on the project management platform. The project	Marketing Team

will include as much information as possible including:

- name of the project
- short description
- who's on the project
- timeline (start date, end date, date span for each step in task list)

SH Marketing team will review existing material to see if changes are needed, uploading the original content and marked-up material. If updates are required, SH Marketing Team member will open a project (with previous version mark-ups attached). The project will include material task lists with dates for starting and completing each task.

The naming convention for materials (stock codes) will be as follows:

File names should always start with the plan code followed by the plan year, SH, material name, and an M or C, (Marketing or Communications document). For example:

Y0013_25SHERBR_C ER Brochure_Final

If a revision is needed after a material has passed through Compliance Review, the Material ID will need an R number. For Example:

Y0013_25SHERBRR1_C

	NOTE:	
	If the material doesn't require an update, SH Marketing Team will notify the business owner and the material will continue to be used as is.	
	If updates are required, SH Marketing Team will open a project with mark- ups pertaining to the updates according to the Materials checklist (branding, benefits, formatting, edits).	
3. Send marked material to client/legal review for additional changes and production details as needed. Hand over to Vendor for review/edits/clean proof. (NOTE: If broker communication is an email, it doesn't go to legal review.)	Once a team review and mark-ups are made, the marketing team will send the material to client and/or legal to be reviewed for additional changes. Additionally, the material will be sent to the vendor to be reviewed and edited as needed. The vendor will then return the material with a clean proof.	Marketing Team Business Owner Legal Vendor
4. Team member sends out for Functional Point Person (FPP) and Subject Matter Expert (SME) review.	-After Client/Legal updates are made, the Marketing team will send the document for FPP review (including SMEs). Review material for requested changes and apply edits.	Marketing Team SME FPP
5. Send materials for pre- compliance review and compliance review. (NOTE: Provider & Broker Communications don't go to compliance.)	Material will then go through precompliance and compliance. The document will go back to the business owner for final approval. Marketing team member will forward document to	Marketing Team Compliance Business Owner

Compliance Consultant who will review and advise if changes are needed or if document has been submitted to CMS. Once the submission to CMS has been accepted/approved, Compliance Consultant will notify Marketing team of the accepted/approved date (MM/YY) to add to the Material ID. (Note: Compliance will not submit a document to CMS which is not final and/or with a date already indicated.) Team member will send material to business owner, update status to final and file any finalized material on the H drive. Final material is then sent appropriately to production, web, print, etc.

For information on **Medicare Advantage Member Materials**, see *Medicare Advantage Member Materials Procedure*.

For information on the **required materials annual mailing in an alternate/accessible format**, see the *Medicare Advantage Required Materials Annual Mailing*.

Linkage(s):

Title	Document Type	Reference Number
Provider Data (SH)	Policy	Policy-SHMA
Medicare Advantage Section 1557 Nondiscrimination Communication Procedure (Revision 56)	Procedure	MM-ME18

Authoritative Reference: Shared Health Executive Mandate, 42 CFR 422.120