

Communication & Marketing Guardrails in Expansion Markets

| Medicare Beneficiary Facing | |
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| Prior to 10/1 <u>WITH</u> CMS approval in expansion areas: | |
| CAN | CANNOT |
| <ul style="list-style-type: none"> Use the “Devoted Health Plans” logo with prior approval. Conduct communication activities only, e.g., describe Devoted Health Plans brand, e.g., messaging “Devoted Health Plan offers complete, coordinated, custom care...”, “All-in-one healthcare with Devoted Health Plan”, and similar corporate branding statements. Make available and receive beneficiary contact information via Devoted Health Plans permission to contact forms only. | <ul style="list-style-type: none"> Use the Devoted Health or Devoted Health Plans logo without prior approval. Engage in marketing activities for upcoming plan year prior to 10/1. As defined by CMS in the Medicare Communications and Marketing Guidelines, marketing content includes plan benefits, benefits structure, premiums, or cost sharing; measuring or ranking standards such as Star Ratings or plan comparisons; or rewards and incentives. State or imply that Devoted Health Plans will be offering plans in any specific market for the following contract year <u>prior to 10/1</u> as this could be interpreted as marketing for the upcoming plan year which is prohibited prior to 10/1 (e.g., “Devoted Health Plans will be expanding to Alaska in 2025”). Make available Scope of Appointment forms prior to 10/1. |
| Prior to 10/1 <u>WITHOUT</u> CMS approval in expansion areas: | |
| CAN | CANNOT |
| <ul style="list-style-type: none"> Use the “Devoted Health” logo with prior approval. Conduct <u>communication</u> activities only, sharing the Devoted Health brand (e.g., messaging “Hope to see you soon!, “Devoted Health will continue our incredible growth in future years”). | <ul style="list-style-type: none"> Use the “Devoted Health” logo without approval. Use the “Devoted Health Plans” logo. Engage in marketing activities for upcoming plan year prior to 10/1. As defined by CMS in the Medicare Communications and Marketing Guidelines, marketing content includes plan benefits, benefits structure, premiums, or cost sharing; measuring or ranking standards such as Star Ratings or plan comparisons; or rewards and incentives. State or imply that Devoted Health Plans will be offering plans in any specific |

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- market for the following contract year prior to 10/1 as this could be interpreted as marketing for the upcoming plan year (e.g., “Devoted Health will be expanding to Alaska in 2025”)
- Collect Devoted Health Plan permission to contact/Business Reply Cards or Scope of Appointment forms.

Agent/Broker Facing

Prior to 10/1 WITH CMS approval in expansion areas:

To use on Business 2 Business materials clearly directed to agents/brokers for recruitment and educational purposes.

CAN

- Use the Devoted Health **Plan** logo on agent/broker-only facing materials (e.g., email, snail mail) and must include the following disclaimer language:

*Confidential. **For <broker/provider> use only. Not for distribution to Medicare beneficiaries.** To enroll in a Devoted Health plan you must meet certain eligibility requirements and reside in the plan's CMS-approved service area. Our plans' <2024> service areas, as applicable, include select counties in <Alabama, Arizona, Colorado, Florida, Hawaii, Illinois, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, and Texas>. <2025> service area depends on CMS contract approval.*

*Note: If communicating about upcoming plan year information (prior to 10/1) need to also include: **Any dissemination of Devoted Health Plans information for the upcoming plan year prior to 10/1 is strictly prohibited.***

CANNOT

- Use the Devoted Health or Devoted Health **Plan** logo without prior approval.
- Engage in marketing activities for upcoming plan year prior to 10/1. As defined by CMS in the [Medicare Communications and Marketing Guidelines](#), marketing content includes plan benefits, benefits structure, premiums, or cost sharing; measuring or ranking standards such as Star Ratings or plan comparisons; or rewards and incentives.
- Posting Devoted Health Plans marketing content (e.g., benefits, benefit structure, premiums, cost sharing, Star Ratings, rewards, incentives, etc) in a site accessible to the public.
- Post **public facing** communications directed to agents/brokers on social media for recruitment purposes mentioning expansion areas for the upcoming plan year prior to 10/1. (e.g., Devoted Health will be expanding to Alaska in 2025)
- Posting upcoming plan year expansion areas in public sites accessible to Medicare beneficiaries.

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- Post communications clearly directed to agents/brokers on social media for recruitment purposes **without mentioning CMS approved expansion areas** e.g., “Devoted Health Plans is expanding in PY 2025! Register for this broker-only event today!”, “Get an exclusive look at what Devoted Health Plans has to offer. Register for this broker-only event today!”
 - Note: Specific expansion areas and plan benefit information for upcoming plan year can only be provided to agents/brokers via a link to a closed site that can only be accessed by agents/brokers. **Service areas and benefits for upcoming plan year may not be made publicly available prior to 10/1.**
- Provide agents/brokers upcoming plan year information, including expansion areas via email, and/or mail only and must include the the following disclaimer language:
 - *Confidential. **For <broker/provider> use only. Not for distribution to Medicare beneficiaries.** To enroll in a Devoted Health plan you must meet certain eligibility requirements and reside in the plan's CMS-approved service area. Our plans' <2024> service areas, as applicable, include select counties in <Alabama, Arizona, Colorado, Florida, Hawaii, Illinois, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, and Texas>. <2025> service area depends on CMS contract approval.*

*Note: If communicating about upcoming plan year information (prior to 10/1) need to also include: **Any dissemination of Devoted Health Plans information for the upcoming plan year prior to 10/1 is strictly prohibited.***

 - **Service areas and benefits for upcoming plan year may not be made publicly available prior to 10/1.**