

4.2 Marketing, Advertising, Outreach and Enrollment

Healthfirst has implemented advertising, enrollment, and outreach/education guidelines and policies to govern the outreach/education of its government-sponsored programs such as Medicare, Medicaid, CHP, and by healthcare providers. These guidelines and policies are based on requirements set by CMS and the New York State Department of Health. The goal of these guidelines is to ensure that advertising, enrollment, and outreach/education activities by all parties involved in Healthfirst programs are conducted in a responsible manner so that potential members receive the most accurate and complete information possible. Providers may advise their members of managed care plans with which they participate, but they must list all plans and cannot promote one plan over another.

Under its contracts with CMS and the New York State Department of Health, Healthfirst is held responsible for advertising, enrollment, and outreach/education activities undertaken by any individual or entity involved in advertising, enrollment, and outreach for, or on behalf of, Healthfirst. This applies regardless of whether Healthfirst directly employs the involved party or whether that party is affiliated with Healthfirst by subcontract or through a participating provider agreement. Hospitals, clinics, physicians, and other providers belonging to the provider network are considered subcontractors and are subject to the marketing guidelines. Violations of the marketing guidelines may lead to a suspension of marketing activities at Healthfirst facilities or regulatory sanctions affecting the provider or Healthfirst. All Healthfirst marketing activities are conducted in strict compliance with CMS and/or NYSDOH guidelines (see Appendix IV). These policies are followed throughout the Healthfirst service area.

Healthfirst does not discriminate against prospective members based on age, gender, race, national origin, sexual orientation, or medical/mental condition. Written advertising, enrollment, and outreach/education materials developed by Healthfirst, as well as those produced independently by Healthfirst providers, must be pre-approved by regulatory authorities. Healthfirst providers who wish to contact their members to apprise them of managed care plan affiliations have the option of using a model letter prepared by the appropriate regulatory agency. This letter is available from Healthfirst upon request. Any modifications to this letter, and newly developed materials prepared by Healthfirst providers that advertise Healthfirst, must be submitted to regulators for pre-approval through Healthfirst.

Please note: Marketing correspondence should not be sent to members who are in an exclusion category for Medicaid and cannot join a managed care plan (see Appendix III).

If you have members in your practice who are interested in or eligible for one of the Healthfirst programs, you may refer them to Healthfirst Member Services. Healthfirst representatives will assist these individuals with the applicable enrollment or application process and will function as the liaison with Maximus, the Medicaid managed care enrollment office, for potential Medicaid members or as the liaison with NY State of Health—the New York health insurance marketplace—for those potential members who may be eligible for a Healthfirst commercial plan.

For providers interested in on-site marketing, Healthfirst will schedule time for a representative to be available at your office or facility for the convenience of your members. Please call 1-888-801-1660 for more information.

All providers participating in Medicaid or Medicare managed care plans are bound by the requirements of Healthfirst contracts with CMS and the New York State Department of Health, which include the MCO Advertising and Outreach Guidelines prepared by the New York State Department of Health (see Appendix IV).