

# POLICY AND PROCEDURE

<b>POLICY NAME:</b> Documentation Development, Review, and Approval Process	<b>POLICY ID:</b> ARTC.COMM.30
<b>BUSINESS UNIT:</b>	<b>FUNCTIONAL AREA:</b> Communication Marketing
<b>EFFECTIVE DATE:</b> 6/1/2018	<b>PRODUCT(S):</b> Medicaid
<b>REVIEWED/REVISED DATE:</b> 9/2020; 8/2021; 9/2022; 6/2023; 5/2024; 5/2025; 3/2026	
<b>REGULATOR MOST RECENT APPROVAL DATE(S):</b>	

## POLICY STATEMENT:

This policy defines the documentation, development, review, and approval process for communication materials created under the brand.

## PURPOSE:

The purpose of this policy is to define and provide clear instructions for the development of documentation for the brand.

## SCOPE:

This policy applies to the brand.

## DEFINITIONS:

- Arkansas Communications Tool (ACT) The process used by the marketing and communications department, run via SharePoint, for the creation and approval of documents and communication materials. Also referred to as “workflow.”
- Document owner — The individual who initiates a project/document in the ACT for the purpose of creating a new or revised document and/or communication material. Also referred to as a project owner.
- ICN — Inventory control number. The identifier assigned all documentation created by the marketing and communications department to assist in project tracking.
- Communications Library — The designated library and source of truth for all approved documentation and communications, housed on SharePoint.
- MarComm — Shorthand for 's marketing and communications department.
- Project lead — The individual within the marketing and communications department who develops a given document/project. Also referred to as “content lead.”
- Design lead — The individual within the marketing and communications department who completes graphic design work on projects where needed. This step takes place after the project/content lead has already developed the overall content of the project.

## POLICY:

This policy details the process for the development, review, and approval of all internal and external documentation relating to the brand. This includes all member- and provider-facing communications, handbooks, marketing materials, promotional campaigns, newsletters, employee communications, fliers, forms, web content, videos, and social media content.

## PROCEDURE:

This policy establishes that all communications, both internal and external, are to be developed in partnership with the marketing and communications department (MarComm). MarComm shall create, revise, and review all communications using a quality check system to ensure the following:

- A clear overall message and strategy
- Grammatical accuracy
- Adherence to established style and brand/design standards
- Accuracy of information, including but not limited to addresses, websites, and phone numbers
- Simplified, people-first language not to exceed a sixth grade reading level for members
- Adherence to fair marketing policies, translations, procedures, and document tracking

MarComm will work to complete the development of new materials in a manner that ensures quality and consistency across all communications. MarComm will follow branding standards and guidelines outlined by Centene Corporation, as well as adhere to the rules and regulations applicable to the Arkansas Insurance Department (AID), the Arkansas

Department of Human Services (DHS), and the Centers for Medicare & Medicaid Services (CMS). Upon approval of final drafts, MarComm shall be responsible for facilitating the production of communications, including but not limited to translations, printing, and web posting, as appropriate. All written materials must be made available in English, Spanish, and Marshallese. Interpretation in writing of any provided information will be made available, upon request, in any language spoken by the member or potential member. All allowable, written marketing materials will be translated into Spanish and Marshallese. Other translations shall be made available where requested. All distribution lists not accessible or housed by MarComm must be provided by the respective document owner.

#### Document Development Process:

##### **Step 1: Project Request**

New project requests must be submitted through the ACT SharePoint site via the appropriate department's workflow channel. The document owner should provide the following information within the project request:

- Project description explaining the nature and necessity of the project
- Type/format of document needed (letter, flier, chart, handbook, video, etc.)
- Target audience (members, providers, specific member group, etc.)
- Communication channel by which the document will be distributed upon approval (mail, email, web, etc.)
- Design specifications (branding, versions, required logos, languages, etc.)
- Plans for distribution (scheduled mailing, distribution as needed, etc.)
- Identified subject matter expert for the project lead to contact for clarification or questions
- A reasonable target completion date by which the document owner would like MarComm to complete the project

Once a project request has been submitted, a MarComm project lead will review and develop the project. If extensive design work is needed, both a content and design lead will be assigned. The project/content lead will communicate with the document owner as needed during the development process and will reach out to the document owner if it is determined that additional information regarding the requested document is needed.

##### **Step 2: Documentation Development**

MarComm will receive the project request and coordinate/develop copy in accordance with the aforementioned guidelines and quality measures. Copy intended for members shall be developed at a sixth-grade reading level that will be measured using the Flesch-Kincaid language scale. A unique inventory control number (ICN) shall be assigned to the document using the following format: ARTCXX-H-XXX. Appropriate copyright information and disclaimers shall be added where applicable.

MarComm shall obtain any bids necessary for the development and/or distribution and include the project cost within the review when necessary.

##### **Step 3: Document Owner Review**

The drafted document shall be returned to the document owner via the ACT site for review and approval. If the document owner does not approve the drafted document, they may request that MarComm make changes. Once changes are made, the document will be returned to the document owner for additional review until the document owner approves the document.

Once approved by the document owner, the document will proceed in the workflow to the designated additional reviewers for internal review and approval.

##### **Step 4: Additional Reviews**

The document will be reviewed by additional departments, including but not limited to Compliance, Medical Management, Provider Relations, and Operations, according to the designated workflow and nature of the document. Once approved, the document will proceed in the workflow to MarComm for final review, layout, and design as needed.

If, at any time, a significant change or update to the document is requested by any reviewing party, the document will return to the first step in the workflow for revisions and approvals.

##### **Step 5: Marketing & Communications Design/Final Review**

The documents will undergo layout and design according to the specifications provided by the document owner and in accordance with all applicable regulations. The document will then proceed to the document owner for a final review and approval.

**Step 6: Document Owner — Final Review**

The document will receive final internal review and approval from the document owner.

**Step 7:** Brand materials developed by MarComm shall be submitted to Arkansas DHS for external review and approval in advance of use.

**Step 8: Communications Library Upload & Notifications**

Once external approvals are received, approval notifications will be sent to all appropriate parties. The finalized document will remain on the ACT site for recordkeeping and future use, as needed.

Document Distribution:

MarComm may assist the document owner with distribution needs as they relate to printing, mailing, emailing, web posting, etc. It is the document owner’s responsibility to inform MarComm of any distribution needs upon the initiation of the project. It also is the document owner’s responsibility to provide MarComm with any and all relevant distribution lists via email and in the workflow, in XML format, prior to distribution. The document owner shall provide any instructions necessary for distribution, such as the specific webpage/URL to be used for web posting, required distribution dates, etc.

Document Review:

Document owners shall notify MarComm via the ACT site of any changes to services and/or products that will impact existing communications. Necessary changes will be made by MarComm, and revised document(s) will be resubmitted to the necessary workflow for approvals. If needed, a new or additional ICN(s) shall be created. The new document(s) shall be remain on the ACT site for recordkeeping and future use upon final approval. Outdated documents shall remain in the Communications Library but be designated as “RETIRED – DO NOT USE.”

Any team member who identifies a problem or error in any internal- OR external-facing material should notify MarComm of the problem immediately. The MarComm manager shall facilitate a review of current documentation/communication materials on an annual basis.

**REFERENCES:** Provider-Led Arkansas Shared Savings Entity (PASSE) Provider Agreement Sections

**ATTACHMENTS:**

**ROLES & RESPONSIBILITIES:**

**REGULATORY REPORTING REQUIREMENTS:**

**REVISION LOG**

REVISION TYPE	REVISION SUMMARY	DATE APPROVED & PUBLISHED
Annual Review	Grammatical corrections	9/9/2020
Annual Review	Corrected grammar, enhanced clarity, and edited procedure to better reflect the order in which certain actions are accomplished. Changed “Document Library” to “Communications Library.” Changed “Excel format” to “XML format.”	8/2021
Annual Review	Updated format to most current P&P template; added policy statement; revised policy scope; added “design lead” as a definition; added note on design leads in the Project Request subsection. Updated “Retired” marker in Document Review section to read “RETIRED – DO NOT USE.”	9/2022
Annual Review	Added Marshallese to translation requirements and cited applicable PASSE Provider Agreement sections in comments and in the References	6/2023

	section. Added PASSE Provider Manual Section 232.000.C to the References section.	
Annual Review	Added all previous revision dates to policy header	5/2024
Annual Review	Revised Definitions section to reflect terminology for new system processes, changing "Workflow" to "Arkansas Communications Tool (ACT)." Updated "Step 8" of Procedure section to reflect the updated ACT process. Revised "Document Review" section of Procedure to reflect the updated ACT process.	5/2025
Ad Hoc Review	Added video as an item type in Policy and Procedure sections. This is not a comprehensive review and will be reviewed again in May.	3/2026

**POLICY AND PROCEDURE APPROVAL**

The electronic approval retained in RSA Archer, the Company's P&P management software, is considered equivalent to a signature.