

**Government Business Division
Policies and Procedures**

Section (Primary Department) Health Education		SUBJECT (Document Title) Non-Monetary Member Incentives - CA	
Effective Date 04/25/2012	Date of Last Review 05/18/2023	Date of Last Revision 05/18/2023	Dept. Approval Date 05/18/2023
Department Approval/Signature:			

Policy applies to health plans operating in the following State(s). Applicable products noted below.

Products	<input type="checkbox"/> Arkansas	<input type="checkbox"/> Iowa	<input type="checkbox"/> Nevada	<input type="checkbox"/> Tennessee
<input checked="" type="checkbox"/> Medicaid/CHIP	<input checked="" type="checkbox"/> California	<input type="checkbox"/> Kentucky	<input type="checkbox"/> New Jersey	<input type="checkbox"/> Texas
<input type="checkbox"/> Medicare/SNP	<input type="checkbox"/> Colorado	<input type="checkbox"/> Louisiana	<input type="checkbox"/> New York – Empire	<input type="checkbox"/> Virginia
<input type="checkbox"/> MMP/Duals	<input type="checkbox"/> District of Columbia	<input type="checkbox"/> Maryland	<input type="checkbox"/> New York (WNY)	<input type="checkbox"/> Washington
	<input type="checkbox"/> Florida	<input type="checkbox"/> Minnesota	<input type="checkbox"/> North Carolina	<input type="checkbox"/> Wisconsin
	<input type="checkbox"/> Georgia	<input type="checkbox"/> Missouri	<input type="checkbox"/> Ohio	<input type="checkbox"/> West Virginia
	<input type="checkbox"/> Indiana	<input type="checkbox"/> Nebraska	<input type="checkbox"/> South Carolina	

POLICY:

Anthem Blue Cross Medicaid (Anthem) recognizes that the use of non-monetary incentives (MI) can motivate individuals to change or adopt improved health-related behaviors, participate in a focus group, or complete a survey.

Anthem must obtain approval from DHCS and/or LA Care prior to offering any type of member incentive, whether for a MI program, focus group or survey. Anthem is required to submit annual updates to justify continuation of an ongoing MI program and an end of program evaluation to describe whether or not the MI program was successful. For Focus Group Incentives (FGI), Anthem must submit an evaluation that includes recruitment, participation methodology, and results summary. The FGI evaluation must also indicate if policy and program changes are warranted. For Survey Incentives (SI), Anthem is required to submit a copy of the survey, along with an evaluation that includes findings and recommendations.

A. Incentive Program Types and Description

The following are specific guidelines for incentive programs, incentives for focus groups and incentives for surveys:

Incentive Programs - A **Member Incentive Program Request for Approval Form** must be approved by DHCS and/or LA Care before Anthem may implement the incentive program. CA Medicaid compliance requires completion of a Gift and Incentive Review Form prior to any member incentive program implementation. All member materials associated with the member incentive needs to be approved through the Health Promotions intranet SharePoint site before distribution.

Focus Groups - Focus groups can be used to help generate ideas and feedback on a particular topic. DHCS and/or LA Care must approve a **Focus Group Incentive Request for Approval Form** before Anthem conducts a focus group that offers an incentive. All member materials associated with the member incentive needs to be approved through the Health Promotions intranet SharePoint site before distribution.

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- The following exceptions apply:
 - Focus Groups/Field Testing Health Education Materials - Anthem does not need DHCS and/or LA Care approval and does not need to submit an FGI Request for Approval Form to give an incentive to members who assist with field testing health education materials. A log that includes the type and value (including the retail value and purchase price) of incentives given to members for field testing health education materials must be kept by appropriate department and the log needs to be available upon request.
 - Participation in Community Advisory Committees/Member Advisory Committees - Anthem does not need permission to give stipends or MI such as transportation vouchers or Visa gift cards to compensate beneficiaries for their time to attend the MCP Community Advisory Committee (CAC) or Member Advisory Committee (MAC). Anthem should keep a log of the type and value (including the retail value and purchase price) of stipends or MI given to members for participation in the CAC or MAC and the log needs to be made available upon request.
1. Member Surveys - Surveys can be used to obtain ideas and opinions from members on certain topics. DHCS and/or LA Care must approve a **Survey Incentive for Approval Form** before Anthem conducts a survey that offers an incentive. All member materials associated with the member incentive needs to be approved through the Health Promotions intranet SharePoint site before distribution.

B. Value of Incentives

The value amount of member incentives should correspond with the value of the service and the commitment and time required of the member to carry out the desired action. The value should not be disproportionately large. Anthem takes into account that the perception of value for an incentive often differs from region to region and from program to program.

1. Incentive Value of Less Than \$25.00

Non-monetary member incentives for single health education classes, preventive care visits or procedures are usually limited to a value less than \$25.00; however, the relevance of a particular incentive to a specific program or intervention is considered in justifying a monetary value higher than \$25.00.

2. Incentive Value of Approximately \$25.00 - \$100.00

When the actions required of members involve attending a series of classes or visits, the value of an incentive may increase proportionately, to a value of approximately \$100.00, taking into consideration the time required, the evidence of sustained commitment and the importance of the healthcare-benefit addressed. For incentive programs that are

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structured to support not only immediate outcome, but also sustained behavior change over time, the value of the incentive may also be increased and extended over a longer period of time.

C. Appropriate Non-Monetary Incentives

MI deemed appropriate for rewarding Anthem members who participate in health education classes and/or programs, disease prevention efforts or management programs include, but are not limited to, the following:

1. Gift Cards, Gift Certificates, Vouchers, and Tickets

Gift cards/certificates, provided by Anthem may be offered to members who participate in health education or disease prevention/management programs, go to their doctor for a preventive care visit, complete appropriate lab work, participate in a focus group or complete a survey. Gift cards and vouchers should be purchased from businesses that have health options available. The gift card/certificate may be accompanied by appropriate health education information. Whenever feasible, suggestions for the redemption of health-related items accompany gift cards/certificates. Anthem includes restrictions for products that may pose health risks, including alcohol and tobacco.

Anthem includes a statement that gift cards cannot be used for the purchase of alcohol or tobacco in letters that are mailed to members, along with gift cards. Additionally, if gift cards are given to member's in-person, the statement is included in the gift card sleeve or envelope.

Tickets to local events such as movies, sporting events, concerts, plays or amusement parks can also be provided.

2. Products or Merchandise

Products or merchandise that promote or are associated with good health practices are purchased by Anthem and are presented to members. These products or merchandise are typically related to the focus of specific Anthem health education programs. Examples include, but are not limited to, the following:

Program	Related Incentives
Prenatal	(pumps are a covered benefit), onesies, diaper bags, pacifiers, baby blankets, baby books
Car Seat Safety class	Convertible car seat
Healthy Babies or	Bathtub, thermometer, safety kit, baby or children's books

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Program	Related Incentives
Child Health	
Asthma Self-Management	Asthma spacers, peak flow meters, hypoallergenic mattress covers, pillowcase covers, children’s books
Child Safety or Bicycle Safety	Bicycle helmets, children’s books about safety
Heart Health, Hypertension, and Cholesterol Control	Blood pressure cuffs, pedometers, cookbooks on healthy eating
Weight Control and Physical Activity	Pedometers, jump ropes, soccer or basketballs, exercise videos, water bottles, stretch bands
Diabetes Self-Management	Glucometers, pedometers, cookbooks on healthy eating

3. Points Rewards Programs

Anthem can create programs to award points to members as an incentive. The points can be traded in for products or merchandise.

4. Transportation Assistance

Tokens or vouchers for bus, taxi and other modes of transportation may be offered to assist members to attend/participate in programs, focus groups or surveys.

5. Enrollment and Monthly Membership Fees

Enrollment and monthly fees can be offered to members to promote good health practices.

6. Raffle

Raffle items that promote or are associated with good health practices (for example, a bicycle, bicycle helmet or workout gear, etc.) may also be used as incentives. A raffle entry of higher value items may be used as part of a member incentive program. These items are typically donated by a merchant or purchased by Anthem.

D. Incentive Use Restrictions

The following addresses the restrictions and prohibitions that Anthem complies with on the use of specific incentives:

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1. Inducing Enrollment or Continuation of Enrollment

Anthem does not offer incentives or any other form of remuneration to members for the purpose of inducing enrollment or continuation of enrollment. Therefore, incentives are only offered to existing Anthem members. Anthem may include descriptions of relevant incentives as part of targeted member communications intended for existing Anthem members and providers, including, but not limited to, the member handbook, member newsletter, new member packet and the Anthem Website member portal. Anthem does not include information regarding **specific** member incentives in any health plan education, outreach, informing or marketing information/materials intended for the general community of potential plan members.

2. Coupons that Could Be Converted to Cash

Anthem does not offer monetary incentives, such as cash, coupons, or instruments that may be converted to money. Anthem may choose to offer members vouchers that are redeemable for specific goods or services to promote good health practices. Anthem is in compliance with the provisions of Civil Code Section 1749.5(b)(2), which addresses avoiding providing gift cards or certificates redeemable for cash.

DEFINITIONS:

None

PROCEDURE:

A. Prior Request for Approval

Anthem obtains Medi-Cal Managed Care Division (MMCD) approval prior to implementing new member incentive programs. Anthem follows the revised submission process delineated in MMCD Policy Letter 16-005 and uses the modified forms, included as attachments to the letter, in order to expedite the submissions and approval processes. The requests comply with the guidelines set forth in MMCD Policy Letters 09-005 and the addendum MMCD Policy Letter 12-002.

Anthem works with its qualified health educators to develop and prepare member incentive requests, as encouraged by MMCD. Anthem recognizes that their assistance and expertise in health education and program evaluation will enable Anthem to develop member incentive program requests that comply with the guidelines outlined in MMCD Policy Letter 09-005.

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B. Completion of the Appropriate Form and Health Education Review

Depending on whether it is a Member Incentive, Focus Group or Survey Incentive, the Business Owner is required to complete the appropriate form, as listed below. All forms are available on the DHCS APL web page, as an attachment to APL 16-005:

1. MI Program Request for Approval Form
2. MI Program Annual Update/Evaluation Form
3. FGI Request for Approval Form
4. FGI Evaluation Form
5. SI Request for Approval Form
6. SI Evaluation

The Incentive Program Request Form, Annual Update or Evaluation Form includes the following requested information:

- Program name (if applicable) and Disease/Behavior Targeted
- Type of Incentive
- Desired start and expected end dates
- Checkbox, which will indicate whether the program is on-going
- Description of the incentive(s), approximate dollar value of each, including the purpose(s) and how it/they will be structured and implemented
- Description of the health education intervention that will accompany the incentive and how the use of incentive(s) supports the program goals and objectives associated with the use of the incentive(s); and
- Description of evaluation plan, measures that will be used to determine whether the program met its objectives, any relevant baseline measures as well as oversight

As a first step, the Business Owner needs to submit the completed form to Anthem's Qualified Health Educator in the Health Education department for review to get Health Education approval. Upon approval, the Health Educator will return the forms back to the Business Owner. After obtaining Health Education approval, the Business Owner should complete the Compliance Gift and Incentive Form to ensure the program complies with Anthem's corporate policy requirements. If there is no member communication material needed, the Business Owner submits the completed approved form to the Regulatory Oversight Manager in Regulatory for submission to DHCS' MMCD Health Education Department for department and/or LA Care to review and approval. The Regulatory Oversight Manager submits the form through the process noted below and tracks the submissions, additional information requests, and approvals.

If a member communication piece is needed, the Business Owner submits the member communication piece request to the Health Promotion SharePoint intranet site and attaches the Anthem Health Educator-approved Member Incentive Request for Approval Form with the job request. The Business Owner needs to take the collateral development completion

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timeframes into consideration. After the internal review process is completed for the communication piece, the Health Promotions team will send the completed form and member communication piece to the Regulatory Oversight Manager for submission to DHCS' MMCD Health Education Department and/or LA Care for review and approval. The Regulatory Oversight Manager submits the form through the process noted below and tracks the submissions, additional information requests, and approvals.

C. Submission and Approval Process

Anthem's Regulatory Oversight Manager submits the Incentive Program Request for Approval Form via the following procedure. The MMCD Contract Manager (CM) is responsible for the oversight of all contract deliverables.

1. All new or revised incentive requests are submitted via e-mail to <mailto:MMCDHealthEducationMailbox@dhcs.ca.gov> and a carbon copy (cc) to the DHCS Managed Care Operations Division Contract Manager. For LA Care, the Regulatory Oversight Manager submits it to LA Care.
2. Instructions for each approval request are on each form. The subject line must comply.
3. The following timeframes must be considered when submitting:
 - a. Request for Approval Forms must be submitted at least 10 days prior to the desired start date by the Regulatory Oversight Manager to DHCS. For LA Care, a Materials Review Form must also be submitted.
 - b. For ongoing MI programs, business owners must submit annual updates 13 months after desired start date. Subsequent updates must be submitted annually, based on the due date of the initial update.
 - c. FGI evaluations are due 60 days after the final focus group.
 - d. SI evaluations are due 60 days after the due date for completed surveys.
 - e. End of program evaluations are due 45 days after the MI program is completed.
4. All questions about incentives are e-mailed by Anthem to the Health Education Mailbox identified above, ensuring that the Anthem name and a brief description of the question is included in the subject line of the e-mail message.
5. MMCD health education consultants review all requests as soon as possible and send responses directly to Anthem, copying the CM.
6. Instead of denying an incentive request, MMCD's health education consultants return the request to Anthem as an Additional Information Request (AIR). The e-mail message will include specific changes needed and/or suggestions for improvement of the member incentive program request.
7. If needed, MMCD health education consultants are contacted by Anthem to provide technical assistance in reviewing a member incentive request that was returned as an AIR.

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8. The Anthem associate submits the revised request in the same manner as the original request above.
9. After the request is approved, the form is e-mailed to Anthem with the date and the name of the MMCD approver.

REFERENCES:

- Civil Code Section 1749.5(b)(2)
- Medi-Cal Managed Care Division Policy Letter 02-04
- Medi-Cal Managed Care Division Policy Letters 09-005
- Medi-Cal Managed Care Division Policy Letter 12-002
- Medi-Cal Managed Care Division Policy Letter 16-005
- Welfare & Institutions Code 14407.1



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Targeted
Disease_Behavior Cc

RESPONSIBLE DEPARTMENTS:

Primary Department:
Health Education

Secondary Department(s):
Clinical Programs
Quality Management
Regulatory

EXCEPTIONS:

None

REVISION HISTORY:

Review Date	Changes
05/18/23	Annual Review Rebranding update made to Policy section to reflect rebranding changes Alphabetized References section

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Review Date	Changes
06/15/22	Annual Review – No Changes
07/20/21	Annual Review. No changes.
08/17/20	Annual Review. Added transportation assistance as an appropriate non-monetary incentive.
09/03/19	Annual Review. Replaced attachments with updated versions. Changed evaluation due dates in relation to desired start date.
09/06/18	Annual Review. Updated References
08/21/17	Annual review. Updated Incentive Program Types and Description; Completion of the Appropriate Form and Health Education Review and Submission and Approval Process sections
09/30/16	Annual review Further clarification on the form review and approval process.
05/02/16	Updated per revised DHCS APL 16-005 to include focus groups and survey incentives. New forms need to be used for submission.
09/23/15	Further clarification of form completion and approval process. Reference to updated versions of the forms and addition of Health Education approval.
07/21/14	Annual Review. Appropriate Non-Monetary Incentives revised. Moved to MBU template.
06/10/13	Added additional step on Pg. 6 #9 to approval process of submitting to LA Care upon DHCS approval.
04/25/12	New policy