Optum Policy Summary
FOR INTERNAL USE ONLY

Policy Information			
Policy Title	Optum External Communications Policy	**Current Version Publish Date**	01/06/2022
Version	3.8	**Original Effective Date**	09/23/2013
Policy Identifier	ID-5234		

Policy Applicability			
Country	All Optum Countries	**State/Territory**	All Optum States/Territories
Employee Applicability	Employees of Businesses shown in this Policy	**Business Applicability**	Specific to Businesses shown in this Policy
Contingent Worker (Contractor) Applicability	Specific to Contingent Workers (Contractors) of Businesses shown in this Policy	**Market Group**	Optum
External Segment	Optum Enterprise Wide	**Internal Segment**	Optum Enterprise Wide
Business		**Division**	
Products Impacted			
Exception Description			

Policy Statement and Purpose

All external communications must be truthful, accurate and complete, and comply with applicable laws and regulations.

Purpose:

This Optum LCRA policy sets forth standards for external communications and identifies certain types of communications that must be reviewed by designated Optum Compliance, Privacy, and/or Legal (CPL) team members before they may be used with external audiences.

Policy Definitions

Business Partner: The accountable designee of an Optum Business Entity who has the appropriate authority and operational knowledge of the policy and business requirements.
Business Entity: Each distinct Optum business, unit, function or legal entity that is subject to comply with applicable state and/or federal laws, regulatory and/or policy requirements.
Non-integrated Business Owner: Business Owners who are not able to access the UHG intranet. These are individuals from an acquired entity that have not been fully integrated into UHG systems.

Policy Provisions

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Written materials as described below that are prepared for audiences external to Optum must be reviewed by designated members of the LCRA External Materials Review (EMR) team before they may be used with external audiences. This policy is not intended to circumvent existing review/approval processes that are established unique to an Optum segment which may include an approval process that engages clients for templates/communications related to their own members.

Non-integrated Business Owners must submit materials to the LCRA External Material Review team at compliance-materialreview@optum.com. All other Business Partners shall submit materials via the External Material Review SharePoint form. The material will be reviewed and triaged to the designated EMR contacts as appropriate.

External Materials That Require Prior Review and Approval
The following categories of written materials must be reviewed and approved by designated EMR contacts prior to use or distribution:

- Risk Quality & Network Services / Risk Adjustment Materials
- Template member facing marketing materials (materials that are marketing a product or service to a member)
- Template provider facing marketing materials (materials that are marketing a product or service to a provider)
- Template member communications (communications to a member that are not marketing a product or service to them)
    - Examples include utilization management letters, program emails
- Template provider communications (communications to a provider that are not marketing a product or service to them)
    - Examples include requests for patient medical records, program emails/faxes
- High-visibility or high-volume public materials
    - Examples include materials for industry speaking events, business to business marketing, ad campaigns
- Regulated documents or materials pertaining to regulated products
    - Examples include FDA-regulated marketing materials, explanation of benefit statements, utilization review letters
- New or updated website content

External Materials That Do Not Require EMR Review
Communications that do not fall under the categories listed above do not need to be reviewed by EMR, but remain subject to all other applicable policies. Examples of materials that typically do not require EMR review include:

- Materials previously approved or derivative of those already approved. Materials do not need to be reviewed twice, in whole or in part, unless their meaning is materially changed. Examples include but are not limited to:
    - A web page using a product sheet previously reviewed and approved does not need to be reviewed again.
    - A template document that has been reviewed and approved does not need to be reviewed each time it is used.
- Sales presentations to existing customers, especially when unique to a given customer.
- Routine business correspondence regarding operational matters.

Additional Review Processes Outside LCRA EMR
There are multiple business review processes across the enterprise that may be required in addition to the EMR process (routine provider communications, press releases, request for proposal [RFPs], etc.). Materials characterizing or describing other businesses of UnitedHealth Group may also be subject to additional approval processes. This policy supplements and does not replace existing business review processes and standards.

Accountabilities
Prior to submitting requests for EMR review, Business Partners are responsible for

- ensuring that materials
    - have been reviewed and approved by applicable business contacts (e.g., Product, Clinical),
    - are in their final state (e.g., edits from business or other reviewers have already been incorporated into the material),
    - are complete, accurate and otherwise comply with the Legal Toolkit for Marketing Materials, Optum Member E-mail Program Guide or any other available guidance prior to being submitted to the LCRA External Material Review mailbox for review.
- submitting complete material review requests to the LCRA External Material Review mailbox (non-integrated Business

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Owners) or the External Material Review SharePoint site (all other Business Partners) and modifying the material based on guidance provided by EMR team.

Compliance, Privacy and Legal
Designated EMR contacts will review submitted materials and provide guidance to the Business Partner

Policy Contacts			
Policy Resources Available	LCRA External Material Review	**Contact(s)**	
Email Questions	compliance-materialreview@optum.com	**Telephone**	
Resources and Materials for this Policy			
Related Policies			
Related Procedures			
Related Internal or External Links	Optum LCRA Risk Management Hub Page https://https://hub.uhg.com/sites/hub/Optum/Corporate-Functions/LCRA/Pages/Optum-Risk-Management.aspx		
Related Process Instructions / References			
Relevant Legal or Regulatory Guidance / Requirements			
Related Job Aids			
Related Process Maps			
Other Reference Links			
Attachments			
Business and Regulatory Requirements			
Description of Business / Regulatory Requirements			
Related Documents			
Policy Owners and Administrators			
Policy Administrator	Saway, Lamis	**Executive Owner**	Klein, Neil F
Policy Owner	Leach, Catherine A		
Review Frequency	Annually	**Next Required Review Date**	01/04/2023
Training and Communication			
Training Owner / Group		**Communications Owner / Group**	
Training Required?	No	**Formal Communications Required?**	No
Required Training Frequency		**Communication Channel**	Email
How is Training			

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Delivered?		

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