This policy is effective March 31, 2014. It replaces Council on Aging’s (COA) previous policy titled Outreach and Media Standards. This policy was last updated on February 1, 2018.

BACKGROUND
This document is part of COA's service agreements with its contracted providers. It provides detailed guidelines for media and marketing. The purpose of these guidelines is four-fold:

1. to protect COA's reputation and brand identity
2. to ensure that activities designed to enhance access to services and increase public awareness are mutually beneficial to the provider and to COA
3. to protect the privacy of individuals enrolled in COA programs
4. to ensure appropriate use of public funds

Any questions about this policy should be directed to Council on Aging’s Communications Manager, Paula Smith, or another member of COA’s Communications Department:

- Communications Manager Paula Smith: D: 513-345-3315, C: 513-509-9211, psmith@help4seniors.org
- Communications Specialist Amy Leonhardt: D: 513-345-3367, aleonhardt@help4seniors.org
- Communications Specialist Anne Sells: D: 513-345-5888, asells@help4seniors.org

REQUIREMENTS

Logo usage
Include a color or black and white Council on Aging logo and/or a text line indicating funding via Council on Aging on:

- Brochures, flyers or any other print or electronic outreach materials involving COA-funded programs
- Annual Reports
- News releases concerning COA-funded programs
- Company website

Logos are available for downloading via COA’s website, www.help4seniors.org, or by contacting a member of COA's Communications Department.

COA's logo should not be altered in any way, nor should it be incorporated into the provider logo in any way.
Program information on provider outreach materials and website (also, see marketing section, below)

Prior to publication, COA's Communications Manager should approve information about COA-funded programs intended for your brochures, flyers, fact sheets for clients, web content, etc.

Your web site should identify your relationship with COA and include a link to www.help4seniors.org. Also, it is desirable for provider agency promotional materials (brochures, flyers, fact sheets, press releases, etc.) to include COA's web address. The purpose for this is to help individuals access our region's Aging and Disability Resource Network and our online Resource and Housing Directory.

News Media

Media stories about COA-funded programs, either initiated by you or in response to inquiries from reporters, should be coordinated with COA's Communications Manager if the story is likely to be significant, such as a prominently placed feature or news story.

The terms “significant” and “prominently placed” refer to non-routine stories that you expect will bring greater than usual positive or negative attention to your organization, the program, and/or COA. These are stories that go beyond routine announcements, briefs, event listings, and the like.

If you are planning such a story or media pitch or news release, please contact COA's Communications Manager or a Communications Specialist as part of your planning process. Note: News releases involving COA-funded programs should include wording that indicates your organization receives funding from Council on Aging of Southwestern Ohio.

If you are reacting to media inquiries that you anticipate will result in a story as described above, it is important to contact COA's Communications Manager or a Communications Specialist prior to responding. It is in the best interest of your organization and of COA for responses to be thought out and coordinated in advance.

If you are asked by the media to identify someone to be interviewed and that person is a COA client who has agreed to the interview, you must notify COA's Communications Manager or a Communications Specialist in advance of the interview.

Marketing and Advertising

Definitions for the purposes of these guidelines:

- **Marketing**: The act of steering or attempting to steer individuals towards a particular product, service, or provider. Marketing materials and tactics may include personal letters, brochures, gifts, discounts, telephone calls, emails, personal sales appointments, and the like.
- **Advertising**: Paid advertisements in any media outlet or format, including but not limited to: print (newspapers, magazines, trade publications, resource guides, billboards, etc.), radio, television, online, or social media.
- **Waiver**: refers to any Ohio Medicaid waiver program, such as PASSPORT, Assisted Living or Ohio Home Care.
- **ESP**: county levy-funded Elderly Services Program.

COA contracted providers are prohibited from the following:

- Marketing waiver or ESP services or products to individuals who are enrolled in a waiver or ESP program or on a waiting list for any of these programs. Such services and products are delivered only via care management and the client's care plan.
- Using Medicaid, levy, or Older Americans Act funds to promote products, services, or lines of businesses not funded by these sources either to the general public or to COA clients.
- Offering a rate to COA clients for any service that is different than the provider’s COA contracted rate for that service.
- Offering gifts, discounts or other sales inducements to COA clients or people on a waiting list for a COA program or service.
- Attempting to influence COA or ESP care managers by offering personal gifts or discounts.

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• Using data in COA’s Provider Quality Report and/or Service Adequacy and Satisfaction Instrument (SASI) to market non-ESP lines of business.
• Using your COA affiliation to promote lines of business that are not affiliated with COA.
• Using COA’s name in any form of advertising that promotes other lines of business, private pay services or the provider in general.

Provider marketing and advertising materials (including print, digital ads, radio and TV scripts) that specifically reference COA programs must:

• Be reviewed by the COA Communications Manager. Please allow sufficient time for review prior to distribution – a minimum of one week.
• For published materials: Include a color or black and white Council on Aging logo or a text line indicating funding via Council on Aging.
• Distinguish between publicly-funded services offered by the provider and same services offered by the provider via private pay. For example, a brochure about your home-delivered meals programs that mentions you are a COA provider should indicate that there are eligibility requirements for meals delivered without charge through the Elderly Services Program or PASSPORT. Such statements as, “subject to eligibility” or “eligibility restrictions apply,” are appropriate.
• Have documented data in the Provider Quality Report and/or Service Adequacy and Satisfaction Instrument (SASI) to support any quality claims pertaining to a specific COA program.