

EXHIBIT I
GOVERNMENT OF GUAM
MARKETING GUIDELINES FOR HEALTH INSURANCE THIRD PARTY ADMINISTRATORS

These marketing guidelines apply to all Health insurance TPAs contracting with or intending to contract with the Government of Guam.

A. MARKETING MATERIALS

1. Each TPA is required to follow the SOB format for publication and inclusion in the marketing brochures. No deviation to the format is allowed. SOB format will be provided by the Government of Guam to TPAs awarded a contract.
2. Each TPA shall prepare a Government of Guam plan brochure, setting forth the benefits and conditions of the plan, for distribution to subscribers and prospective subscribers. Brochures must identify items such as cheat sheets, Q & A's, highlights of changes, information on how to access benefits and changes to benefits should they become Medicare eligible, guidance to seek assistance at urgent care as supposed to GMHA in case of non-emergency situations, etc.
3. TPAs must insert language advising subscribers that providers change during the contract period.
4. TPAs must publish their provider networks in their brochures, and shall make available in electronic format, upon request.
5. TPAs must provide a listing of providers who accept Medicare in the RSP brochure.
6. TPAs shall make available, upon requests, marketing products to include provisions of alternative format/services (audio tape, radio announcements, large print braille, and use of ASL Interpreters, open/closed captions for videos, ASCII, HTML or word processing form on a computer diskette or CD, or HTML on an accessible website) upon request.
7. Each TPA may prepare other marketing materials, including newspaper and other media advertising copy, in addition to those required in paragraphs 1 above. Each TPA may also include with the marketing materials company-branded items such as pens, pencils, note pads, ID card wallets, and other similar items. The aggregate value of such items *shall not* exceed Five Dollars (\$5.00) per set of marketing materials.
8. All marketing materials, including company-branded items, must be submitted to the Government of Guam's Director of the Department of Administration or his or her designee with a written statement signed by an appropriate officer of the TPA certifying that the materials have been prepared in accordance with these guidelines.
9. The Government of Guam's Director of the Department of Administration must approve the content of all marketing materials and company-branded items in writing. Such written approval, however, does not guarantee the TPA that its marketing materials will be free from future scrutiny or that the TPA will not attract penalties should the marketing materials later be determined to be out of compliance with these guidelines.
10. Marketing materials and company-branded items which have not been approved for content may not be distributed or displayed. Further, no marketing materials may be distributed or displayed prior to the date specified in writing by the Director of the Department of Administration. No marketing

materials will be approved for distribution or display prior to the conclusion of negotiations with all TPAs.

11. Once approved for content and distribution and display, all marketing materials, excluding newspaper and other media advertising copy, must be printed and made available to the Government of Guam subscribers, prospective subscribers, agencies and departments ~~as quickly as possible or at no later than the day before the commencement of the Group Health Insurance Open Enrollment.~~
12. All designated Open Enrollment Periods and Presentations for Departments/Agencies to government of Guam Employees and/or Retirees must be approved as a Government Sanctioned Event and scheduled by the Department of Administration. TPAs cannot schedule their own presentations with departments/agencies. Failure to comply will result in a penalty.

B. MARKETING STANDARDS

1. All marketing materials, including newspaper and other media advertising and open enrollment presentations, must be truthful and not misleading.
2. All marketing materials must be worded simply, clearly and concisely so that they are readily understandable.
3. All marketing materials must contain sufficient detail to ensure accuracy.
4. At least the plan brochure should contain a statement that full details of the plan are contained in the TPA's contract with the Government of Guam.
5. If an insurance company markets wrongful products, benefits or advertises in their brochure incorrect information, the insurance company must place at least 2 media advertisements, in addition to giving memos to all enrollees, satisfactory to the Department of Administration, of correct version. Plans must also prepare an insert of corrected information and include it in all brochures, if not already corrected the language in the brochure.

C. PENALTIES FOR NON-COMPLIANCE

1. Failure to conform to these guidelines may result in corrective action by the Department of Administration. Such corrective action will be appropriate to the circumstances. For example, if a TPA indicates benefits or other plan provisions that are more favorable to enrollees than those specified in the Government of Guam contract, the TPA will be required to provide those more generous benefits or provisions without additional compensation for the entire contract year(s).
2. During Open Enrollment and throughout the plan year, members' completed enrollment forms must be transmitted within 3 business days to the appropriate TPA(s) and department(s) to ensure proper enrollment and payroll deductions are recorded. For example, if TPA "A" receives TPA "B's" enrollment/change of status form, then TPA "A" needs to transmit the enrollment/change of status form to TPA "B" and to the Employee/Retiree's department within 3 business days. Failure to comply may result in a penalty of one thousand dollars (\$1,000) for each enrollment form not forwarded to the appropriate party(ies). Penalty minimum of one thousand dollars \$1,000 not to exceed ten thousand dollars (\$10,000)
3. Any and all Open Enrollment Presentations/Fairs/Meetings provided to department/agencies employees/retirees not approved as a government sanctioned event by the Department of Administration must cease immediately upon being informed, whether verbal or written. First offense

will be penalized one thousand dollars (\$1,000). Any other or repeat offense will be penalized five thousand dollars (\$5,000) per day not to exceed ten (10) days.

4. Interpretation and enforcement of these guidelines *shall be at the sole discretion* of the Director of the Department of Administration. The Government of Guam shall have no liability with regard to the alleged or actual failure to enforce these guidelines.

D. EXPENSES

1. A Personnel/Payroll Officers meeting will be conducted prior to the Open Enrollment Period. The **purpose of this meeting** is to advise all department representatives of the benefits available and premiums for the Health insurance program. The insurance company awarded the contract will secure and absorb the cost of the Personnel/Payroll Officers Meeting. The insurance company shall make best efforts to limit its costs to those items necessary to meet the purpose of the meeting. Specifications will be provided by the Government.
2. All expenses involved in the preparation and distribution of marketing materials shall be borne by the respective TPA. The Government of Guam shall have no liability with regard to any marketing materials or any costs which may be incurred because of any alleged or actual delay in the approval or a TPA's marketing materials."

E. AGREEMENT TO MARKETING GUIDELINES

By signing below, the offeror agrees to comply with the Marketing Guidelines.

Insurance Company: _____

Print/Signature/Date: _____