



**Policy Title:** Communications Policy

**Issue Date:** December 18, 2013

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March 18, 2016  
October 17, 2014

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## **I. Purpose**

BeWellnm, New Mexico's Health Insurance Exchange, strives to provide the public with accurate and timely information regarding its implementation of the Affordable Care Act (ACA) and the New Mexico Health Insurance Exchange Act, and its efforts to improve access of New Mexicans to affordable health care insurance. The beWellnm shall communicate about its activities in a professional manner and in accordance with applicable laws regarding public information, including the Inspection of Public Records Act (IPRA).

This policy provides external communications guidelines for all beWellnm employees, members of the Board of Directors, and beWellnm Contracting Partners.<sup>1</sup>

This policy addresses communications through various media, including, but not limited to:

- Media relations such as requests for interviews, news releases, and media inquiries;
- Printed materials such as newsletters, articles, brochures and rack cards; and
- Electronic materials such as email, postings to web sites or social media sites.

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<sup>1</sup> The term Contracting Partners includes those vendors and entities with which beWellnm contracts to provide services to beWellnm. Contracting Partners does not include entities, such as the Office of the Superintendent of Insurance, the Human Services Department, or health insurance issuers with which beWellnm may cooperate with through memoranda of understanding or other necessary agreements.

BeWellnm recognizes that persons associated with beWellnm may be asked to comment on beWellnm matters outside of their official role with beWellnm. Therefore, this policy also provides guidelines to be followed when communicating as a private citizen on matters pertaining to beWellnm business.

## **II. Goals of beWellnm Communications**

As an organization, beWellnm seeks to:

- Clearly and concisely communicate the mission of beWellnm as well as its services, activities, goals, partnerships and accomplishments;
- Be transparent in addressing any issues, concerns or complaints regarding communications and activities of beWellnm;
- Update the media and external parties on progress toward measurable milestones such as enrollments, outreach activities, procurements and vendor selections and other business of beWellnm;
- Be fair, professional, timely and consistent in responding to media requests, IPRA requests and other requests for information;
- Be timely and accurate in posting news to the beWellnm website;
- Keep beWellnm board and staff members informed of media coverage of beWellnm;
- Develop and maintain key stakeholder relationships and lists to assist in reaching out to the community beyond the media; and
- Consistently work to improve and refine all beWellnm communications activities

## **III. beWellnm Affiliate Specific Provisions**

The following provides guidelines for communications for:

- beWellnm Employees
- beWellnm Board of Directors
- beWellnm Contracting Partners

### **A. General guidelines for Employees**

All beWellnm employees have a responsibility to help communicate accurate and timely information to the public in a professional manner.

### **Handling General Requests:**

All staff is responsible for communicating basic and routine information to the public in relation to their specific job duties. Requests for private data or information outside of the scope of an individual's job duties should be routed to the Director of Communication and Outreach, or in their absence, the Chief Executive Officer or other designated staff member or consultant. Requests for public records pursuant to the Inspection of Public Records Act shall be directed to the Records Custodian immediately.

### **Communicating on behalf of the beWellnm**

The beWellnm Director of Communications, Chief Executive Officer, and/or designated consultants are authorized to communicate on behalf of beWellnm in interviews, publications, news releases, on social media sites, and related communications.

Other employees may represent beWellnm if approved by one of the individuals above to communicate on a specific topic. When acting on behalf of the beWellnm:

- Employees must identify themselves as representing beWellnm. Account names on social media sites must clearly be connected to beWellnm and approved by the Chief Executive Officer or Director of Communication and Outreach.
- All information must be respectful, professional, and accurate. Corrections must be issued when needed.
- Employees shall refrain from expressing personal opinions related to beWellnm activities.
- Employees who have been approved to use social media sites on behalf of beWellnm should seek assistance from the Chief Executive Officer, Director of Communication and Outreach, or designated consultant if they have questions about what is to be included in a post or statement.
- Employees shall limit the use of personal technology (including cell phones, home computers, cameras, etc.) when conducting beWellnm activities. If an employee needs to use personal technology, the employee shall first notify the Chief Executive Officer or Director of Communication and Outreach. beWellnm activities conducted using personal technology, including the data transmitted or stored on personal technology, shall remain subject to applicable beWellnm policies, including this communication policy, and may be considered a public record under IPRA.

## **Handling Media Requests:**

All requests for interviews or information from the media are to be routed to the Director of Communication and Outreach, or in their absence, the Chief Executive Officer or other designated staff member or consultant. Media requests include anything intended to be published or viewable to others in some form such as television, radio, newspapers, newsletters, web sites, or social media. When responding to media requests, employees should follow these steps:

1. An employee who is not authorized to respond to a particular media request should decline to respond. The employee should inform the requester of the appropriate contact for the request, and should offer to collect the necessary information to allow beWellnm to respond promptly and appropriately.
2. Collect the following information:
  - Reporter name
  - Media outlet
  - Phone number
  - Email address
  - Question/topic they are inquiring about
  - Deadline
3. Send the above information to [media@NMHIX.com](mailto:media@NMHIX.com) for follow-up by the Director of Communication and Outreach, the Chief Executive Officer, or other designated staff member or consultant.

## **Reporting Errors:**

Any employee who identifies a mistake or inaccuracy in the presentation of information about beWellnm should immediately bring the error to the attention of the Director of Communication and Outreach, or in their absence, the Chief Executive Officer

## **Personal Communications and use of social media**

It is important for employees to remember that personal communications may reflect on beWellnm. The following guidelines apply to personal communications including, but not limited to, various forms of social media (Facebook, Twitter, blogs, YouTube, etc.), letters to the editor of newspapers, and personal endorsements.

- Remember that what you write is public, and will be so for a long time. It may also be spread to large audiences. Use common sense when using email or social media sites. It is a good idea to refrain from sending or posting information that you would not want your boss or other employees to read, or that you would be embarrassed to see in the newspaper;

- If you come across conversations online that would benefit from a response from beWellnm, please bring them to the attention of the Director of Communication and Outreach or Chief Executive Officer;
- If you are not authorized to speak on behalf of beWellnm and you publish something that is related to beWellnm business, identify yourself and include a clear and concise statement that you are an employee of the New Mexico Health Insurance Exchange but you are expressing your own opinions and your opinions do not represent those of beWellnm; and
- Personal social media account names or email names should not be tied to beWellnm (e.g., Patricianmhix).

**Trademark:**

Regardless of whether the communication is in the employee’s official beWellnm role or in a personal capacity, employees must comply with all laws related to trademark, copyright, software use etc. Employees must also follow all applicable beWellnm policies.

**B. General guidelines for members of beWellnm Board of Directors**

As public officials, Directors may be asked to comment in public or to media on beWellnm activities, the Affordable Care Act (ACA) in New Mexico, or the ACA in general. Directors are expected to adhere to the following provisions when making official communications regarding beWellnm:

- The Chair of the Board of Directors shall be the primary spokesperson for the Board of Directors regarding beWellnm activities.
- Directors are not authorized to speak on behalf of beWellnm unless given authorization by the Director of Communication and Outreach or the Chief Executive Officer. Directors that communicate to media on beWellnm activities should include a clear and concise statement that the Director expresses a personal opinion and the opinion does not represent the opinion of the New Mexico health Insurance Exchange.
- Directors should notify the Director of Communication and Outreach if they have been asked to give an interview and/or provide comment on beWellnm activities. Directors should let the Director of Communication and Outreach know if they need any information or background for the interview and/or if they want someone to accompany them to the interview.
- Directors should take down the name of the reporter, their media outlet, their contact info (if available) and when the story is expected to run and send this information to the Director

of Communication and Outreach to ensure the story is tracked and fact-checked following publishing.

- If a Director does not have adequate information or feels uncomfortable about answering a question, the Director should feel free to decline comment and direct the question to the Director of Communication and Outreach.

### **C. General guidelines for Contracting Partners**

It is anticipated that partner organizations to beWellnm will be asked to comment publicly about their role with beWellnm. Contracting Partners are expected to follow the policy below in communicating about beWellnm:

- Contracting Partners shall not speak on behalf of beWellnm to media. All media requests related to their role as an Exchange organization should be directed to the beWellnm Director of Communication and Outreach;
- Contracting Partners that speak to the media without authorization should be clear to media that their opinions and comments are their own as a private organization and do not represent those of beWellnm.
- Contracting Partners shall consult with the Director of Communication and Outreach regarding beWellnm approval for communicating publicly about their activities relating to beWellnm. For example, Contracting Partners involved in enrollment events or promotion of activities in the community may be expected to communicate publicly regarding the events.
- Contracting Partners should send copies of any coverage their organization receives related to beWellnm or to their role in implementing the Affordable Care Act to the Chief Executive Officer and the Director of Communication and Outreach so that beWellnm can keep the information on file.

### **IV. Rapid Response Policy**

It is anticipated that situations may arise that require beWellnm to respond quickly, effectively and with a single, unified voice. In such situations, Board members and staff shall adhere to the following organized framework for assessing and responding to issues in order to ensure a strategic and streamlined process.

The New Mexico Health Insurance Exchange has a Rapid Response team that consists of:

- beWellnm Chief Executive Officer
- beWellnm Director of Communication and Outreach
- beWellnm Legal Counsel

- Contracted Media consultants
- Other individuals designated by the beWellnm Chief Executive Officer

If an issue arises that needs the attention of the Rapid Response Team (RPT), please contact the Director of Communications and Outreach, or in their absence the Chief Executive Officer, immediately.

## V. Questions

Questions related to this policy or to communications issues in general should be directed to the Director of Communication and Outreach or to the Chief Executive Officer.

**PASSED, APPROVED, AND ADOPTED this 16<sup>th</sup> day of March, 2018.**

**Approved by:**

A handwritten signature in blue ink, appearing to read "James R. Damron MD".

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Dr. James R. Damron  
Chair