



Policy: AA.1223
Title: **Participation in Community Events by External Entities**
Department: Communications
Section: Community Relations

CEO Approval: /s/ Michael Hunn 12/16/2024

Effective Date: 02/02/2017

Revised Date: 12/01/2024

Applicable to: ☐ Medi-Cal
☐ OneCare
☐ PACE
☒ Administrative

I. PURPOSE

This policy establishes guidelines for CalOptima Health's Participation in community events, programs, projects, and activities involving external entities.

II. POLICY

- A. CalOptima Health recognizes the value of partnering with external entities to provide additional health care related services to benefit the local community, while still upholding its fiscal responsibilities as a steward of public funds. Requests for CalOptima Health's Participation in community events involving external entities, financially, or otherwise, shall be approved only if aligned with CalOptima Health's mission, vision and values.
- B. An external entity may be eligible for CalOptima Health's Participation in its event if the entity is a community-based, non-profit organization, health care partner, public or government entity (collectively, "external entities") that serves CalOptima Health members or supports CalOptima Health's mission, vision and values. Religious organizations are not eligible for CalOptima Health's Participation unless the event is open to the general public and is for a non-sectarian purpose.
- C. The expenditure of CalOptima Health's funds shall only be made for a direct and primary public purpose within CalOptima Health's authority and jurisdiction. Absent a legitimate and direct public purpose within CalOptima Health's authority and jurisdiction, CalOptima Health shall not use public funds to make monetary contributions to external entities solely for the purpose of goodwill, showing support, networking, public relations, or relationship building. External entities may not use CalOptima Health's Participation in any manner to donate, or endorse, political candidates to elected office, or to support/oppose a position on proposed legislation, ballot initiative, or proposition.
- D. CalOptima Health's Participation shall include at least one (1) of the following:
 - 1. A speaking opportunity for a CalOptima Health representative;
 - 2. A presentation, or panel presentation, by a CalOptima Health representative;

3. A booth, or table, designated for CalOptima Health at the event to distribute CalOptima Health information to members and/or potential members who could be enrolled in any of CalOptima Health's programs; or
 4. Other opportunity to promote CalOptima Health's services and increase awareness about CalOptima Health.
- E. There may be circumstances where financial Participation for external entities, such as charitable organizations, or activities (*e.g.*, United Way), may be permitted based on a finding by the CalOptima Health Board of Directors that the request for financial Participation falls within CalOptima Health's authority and purpose, and meets one (1) of the following criteria:
1. The financial Participation will be used by the external entity to provide a service that complements, or enhances, one that CalOptima Health provides; or
 2. There is an identifiable benefit to CalOptima Health and/or its members.
- F. The expenditure of CalOptima Health funds and the use of resources, staff time, and CalOptima Health facilities shall not be inconsistent with, or in conflict with, CalOptima Health's obligations under applicable state and federal laws and contracts.
- G. Requests for Participation by CalOptima Health in an event proposed by an external entity shall require approval as follows:
1. Requests for Participation, other than financial contributions, such as hosting booths at health fairs, conducting education programs and presentations, or organizing community/town hall meetings:
 - a. Requests for non-financial Participation from external entities shall be submitted no less than fourteen (14) calendar days in advance of the date of the event.
 - b. The Chief Executive Officer (CEO) or his/her designee is authorized to approve non-financial requests from external entities for community/member-oriented events that meet the eligibility requirements as provided in this Policy.
 - c. Non-financial Participation requests from external entities for community/member-oriented events such as health fairs, educational events, and/or community/town hall forums shall meet the standards set forth above in Sections II.A. through II.F. along with the following criteria:
 - i. Member interaction/enrollment – The activity shall include Participation from CalOptima Health members and/or potential members that could be enrolled in any of CalOptima Health's programs, or be in furtherance of CalOptima Health's mission, vision & values, programs, and/or purpose; and
 - ii. Inclusion of Details of the Event – Information about the organization and event, including name of the organization hosting the event, the name of the event itself, day/date, start and end time, location, event coordinator contact information, expected number of attendees, primary demographics of people served, purpose and outcome of the proposed event, and description of CalOptima Health's Participation in the event.

2. Requests for financial Participation, up to and including, a cumulative value of twenty-five thousand dollars (\$25,000) per organization per fiscal year, which shall include all materials and supplies:
 - a. Requests for financial Participation in an amount up to and including twenty-five thousand dollars (\$25,000) per organization per fiscal year, inclusive of all materials and supplies, shall be submitted no less than twenty-one (21) calendar days in advance of the date of the event, or if in a shorter amount of time, at the discretion of the CEO, or his/her designee, so long as such request is submitted to the CEO, or his/her designee, in a reasonable and sufficient amount of time so that CalOptima Health can complete a meaningful review and evaluation of the request.
 - b. The CEO or his/her designee is authorized to approve requests for financial Participation for qualifying external entities and events for a cumulative amount of up to and including twenty-five thousand dollars (\$25,000) per organization per fiscal year, subject to availability of budgeted funds.
 - c. All requests for financial Participation to CalOptima Health from external entities shall meet the standards set forth above in Sections II.A. through II.F. along with the following criteria:
 - i. Member interaction/enrollment – The activity shall include Participation from CalOptima Health members and/or potential members that could be enrolled in any of CalOptima Health’s programs or be in furtherance of CalOptima Health’s mission, vision & values, programs, and/or purpose; and
 - ii. Inclusion of Details of the Event – Information about the organization and event, including the name of the organization hosting the event, the name of the event itself, day/date, start and end time, location, event coordinator contact information, expected number of attendees, primary demographics of people served, purpose and outcome of the proposed event, description of CalOptima Health’s Participation in the event, and/or how CalOptima Health’s financial Participation will be used, etc.
 - d. The CEO or his/her designee is authorized to purchase and use in-kind contributions of items branded with CalOptima Health’s logo for the purpose of outreach and promoting CalOptima Health’s role and services in the community.
 - e. The CEO or his/her designee will report all approved Participation in events involving financial Participation in an amount up to and including twenty-five thousand dollars (\$25,000) per organization per fiscal year to the CalOptima Health Board of Directors in the CEO’s regular Board communications, including, but not limited to, the CEO’s weekly updates and reports included in the next available regularly scheduled Board of Directors meeting.
3. Requests for financial Participation in amounts of more than twenty-five thousand dollars (\$25,000) per organization per fiscal year:
 - a. Requests for financial Participation for the amount of more than twenty-five thousand dollars (\$25,000) per organization per fiscal year shall be submitted no less than sixty (60) calendar days in advance of the date of the event.
 - b. Financial requests from qualified external entities for eligible events valued at more than twenty-five thousand dollars (\$25,000) require approval from the CalOptima Health Board of Directors and a finding that such financial Participation is in the public good, subject to

availability of budgeted funds, and within CalOptima Health's authority and statutory purpose.

- c. All requests for financial Participation to CalOptima Health from external entities shall meet the standards set forth above in Sections II.A. through II.F. along with the following criteria:
 - i. Member interaction/enrollment – The activity shall include Participation from CalOptima Health members and/or potential members that could be enrolled in any of CalOptima Health's program, or be in furtherance of CalOptima Health's mission, vision & values, programs, and/or purpose; and
 - ii. Inclusion of Details of the Event – Information about the organization and event, including name of the organization hosting the event, the name of the event itself, day/date, start and end time, location, event coordinator contact information, expected number of attendees, primary demographics of people served, purpose, and outcome of the proposed event, description of CalOptima Health's Participation in the event, and/or how CalOptima Health's financial Participation will be used, etc.
 - d. The CEO or his/her designee is authorized to purchase and use in-kind contributions of items branded with CalOptima Health's logo for the purpose of outreach and promoting CalOptima Health's role and services in the community.
 - e. The CEO or his/her designee will report all approved Participation in events involving financial Participation in amounts more than twenty-five thousand dollars (\$25,000) per organization per fiscal year to the CalOptima Health Board of Directors in the CEO's weekly updates and reports included in the next available regularly scheduled Board of Directors meeting.
4. In determining the value of CalOptima Health's Participation in events involving external entities, the following factors shall be considered:
- a. The use of CalOptima Health staff time (*e.g.*, in their capacity as a CalOptima Health employee) to attend events such as health fairs, educational or community events;
 - b. The use of CalOptima Health resources (*e.g.*, CalOptima Health facilities);
 - c. The use of current, or future, CalOptima Health eligible funds; and
 - d. The value of items donated with the CalOptima Health master brand/logo.
- H. In no event shall approval of CalOptima Health's Participation in an event, or with an external entity, constitute an Endorsement of the external entity hosting the event, nor shall such Participation constitute Endorsement of any particular message, or initiative, commercial product or service, and/or any message advocated by the external entity. Endorsements and use of CalOptima Health's name, or logo, in any material by an external entity shall be governed by CalOptima Health Policy AA.1214: Guidelines for Endorsements, for Letters of Support, and Use of CalOptima Health's Name and Logo.
- I. The CEO or his/her designee shall report any Participation approved by the CEO to the CalOptima Health Board of Directors, in writing, at the next available regularly scheduled Board of Directors meeting after such approval.

- J. The CEO or his/her designee shall provide members of the CalOptima Health Board of Directors with advanced notice, so they have the opportunity to attend events in which CalOptima Health participates.
- L. Payment for actual and necessary expenses incurred in the course of performing services for CalOptima Health, including expenses incurred in the course of attending functions of external entities, shall be reimbursed, or paid in accordance with CalOptima Health Policy GA.5004: Travel Policy, to the extent there is a clear nexus between the attendance of the employee at such a function and the performance of the service for which such employees is regularly employed. In no event shall CalOptima Health pay or reimburse a CalOptima Health employee for expenses arising from personal expenses, political campaigns or activities, charitable contributions, or events (including fundraisers, galas, dinners, unless expressly approved by the Board of Directors), family expenses, entertainment expenses, or religious activities.
- M. In the event CalOptima Health's Participation in an event involving an external entity involves any Marketing Activities, such Marketing Activities shall be consistent with all applicable legal and contractual requirements, as well as all internal policies, including, but not limited to, CalOptima Health Policy MA.2002: Marketing Activity Standards.

III. PROCEDURE

- A. All requests for Participation shall be submitted within the timeframe specified above, and include the following information, as appropriate:
 - 1. Description of the external entity requesting Participation, including, but not limited to: whether the external entity is a non-profit organization, religious organization, for-profit organization, or other health care partner (including valid by-laws filed with the Secretary of State of the State of California); how long the external entity has been operating; where the external entity's principle office and base of operations is located; external entity's service area, etc.;
 - 2. Description of the event such as name of the event, day/date, start and end time, location, event coordinator contact information, expected number of attendees, primary language of attendees, primary demographics of people served, purpose, and outcome of the proposed event;
 - 3. The purpose of the event, including, but not limited to, a copy of any event materials, or description of the program or project;
 - 4. Description of relationship between external entity's work, or event, and CalOptima Health's programs/lines of business, mission, vision & values, programs, and/or purpose;
 - 5. Description, background, and pertinent information (*e.g.*, names of members of the Board of Directors) regarding the requesting entity and any other entity having a substantial role in the event;
 - 6. A list of other individuals, or entities, supporting the event;
 - 7. Event budget information; and
 - 8. Purpose, role, and anticipated time commitment for CalOptima Health's involvement in the event, if applicable.

- B. Upon receipt of a complete request for Participation, CalOptima Health's Community Relations Department shall:
 - 1. Review and analyze the request to ensure each criteria is met;
 - 2. Complete the Event Participation Request Form and place the completed form and all supporting documentation in a folder within five (5) business days of the date of receipt of completed request;
 - 3. Submit the request to the CEO, his/her designee, or to the Board of Directors, where applicable, for consideration. If the request is denied, the requestor shall be notified.
- C. Upon receipt of the approved request for Participation from the CEO, his/her designee, or the Board of Directors, CalOptima Health's Community Relations Department shall:
 - 1. Notify the requesting entity of CalOptima Health's determination; and
 - 2. Process the financial request and any necessary documents within three (3) business days of the determination date.
 - 3. Any payments for approved financial requests shall be issued only through checks paid directly to the external entity, and no cash disbursements will be made for events covered by this Policy.
- D. Requests for In-Kind Contributions of Items Branded with the CalOptima Health Logo:
 - 1. Requests shall be submitted to CalOptima Health's Community Relations Department, in writing, at least thirty (30) calendar days in advance of the date for which an entity wishes to distribute items branded with the CalOptima Health master logo.
 - 2. Upon receipt of a complete request to distribute items branded with the CalOptima Health master logo, CalOptima Health's Community Relations Department shall review and analyze the request with input from appropriate internal departments within five (5) business days.
 - 3. The Community Relations Department shall submit a request to the Chief Executive Officer (CEO) or his/her designee for approval of a donation of items valued at five dollars (\$5) or less, and up to and including a cumulative total of five hundred dollars (\$500) worth of goods. Requests to distribute items that exceed a cumulative total of five hundred dollars (\$500) shall require the prior approval of the CalOptima Health Board of Directors.
 - 5. The Community Relations Department shall notify the requesting entity, in writing, after CalOptima Health's determination is made.
 - 6. The Community Relations Department shall process an approved request to distribute items branded with the CalOptima Health master logo within three (3) business days of approval.
 - 7. The requesting entity shall agree to return any items that it does not distribute at the conclusion of the event for which the item was used.

IV. ATTACHMENT(S)

- A. CalOptima Health Public Activity Participation Request Form
- B. CalOptima Health Public Activity Transmittal Form

V. REFERENCE(S)

- A. California Constitution Article 16, §6
- B. California Government Code, §8314
- C. CalOptima Health Policy AA.1214: Guidelines for Endorsements by CalOptima Health, for Letters of Support, and Use of CalOptima Health Name or Logo
- D. CalOptima Health Policy GA.5004: Travel Policy
- E. CalOptima Health Policy MA.2002: Marketing Activity Standards

VI. REGULATORY AGENCY APPROVAL(S)

None to Date

VII. BOARD ACTION(S)

Date	Meeting
02/02/2017	Regular Meeting of the CalOptima Board of Directors
10/01/2020	Regular Meeting of the CalOptima Board of Directors
08/05/2021	Regular Meeting of the CalOptima Board of Directors
12/01/2022	Regular Meeting of the CalOptima Board of Directors

VIII. REVISION HISTORY

Action	Date	Policy	Policy Title	Program(s)
Effective	02/02/2017	AA.1223	Participation in Community Events by External Entities	Administrative
Revised	11/01/2018	AA.1223	Participation in Community Events by External Entities	Administrative
Revised	02/01/2020	AA.1223	Participation in Community Events by External Entities	Administrative
Revised	10/01/2020	AA.1223	Participation in Community Events by External Entities	Administrative
Revised	08/05/2021	AA.1223	Participation in Community Events by External Entities	Administrative
Revised	12/01/2022	AA.1223	Participation in Community Events by External Entities	Administrative
Revised	11/01/2023	AA.1223	Participation in Community Events by External Entities	Administrative
Revised	12/01/2024	AA.1223	Participation in Community Events by External Entities	Administrative

IX. GLOSSARY

Term	Definition
Endorsement	For purposes of this policy, the support or promotion of a project, event, document, program, or initiative conducted by an external entity for the benefit of that entity, and for which support or promotion CalOptima Health does not receive a comparable benefit. Endorsement does not include any sponsored educational activity, purchased service, presentation, attendance at an event, activity that is included in the definition of Marketing Activities, or joint development of an event, seminar, symposium, educational program, public information campaign, or similar event.
Marketing Activities	For purposes of this policy, any activity conducted by or on behalf of CalOptima Health where information regarding the services offered by CalOptima Health is disseminated in order to persuade or influence eligible beneficiaries to enroll or to educate members and promote optimal program use and Participation. Marketing also includes any similar activity to secure the Endorsement of any individual or organization on behalf of CalOptima Health.
Participate/ Participation	For purposes of this policy, this is the provision of financial assistance or in-kind contribution of goods, supplies, materials, facilities, staff time, and/or services by CalOptima Health to an external entity in support of one or more events, programs, projects, and/or activities (collectively, “events”) in furtherance of CalOptima Health’s mission, vision & values, programs, and/or purpose.