

Agent Website Check List

The Centers for Medicare & Medicaid Services (CMS) has taken an interest in agent created websites. This tool has been created for you in response to this interest. It is an abbreviated list of items covered in the Agent Guide as well as the Agent Website Job Aid and the Agent Marketing and Generic Materials Job Aid. If you choose to create a website, please be aware of the following safeguards and best practices to help ensure your website remains compliant.

UnitedHealthcare appreciates your diligence in wanting to advertise compliantly. You must be licensed, contracted, appointed (if applicable), and certified in order to create a social media platform. It does not matter if your website uses the UnitedHealthcare logo or branding and it does not matter who the target audience is (consumers or agents). All websites owned by contracted agents or agencies **must be registered** and are subject to review.

The promotion of your affiliation with UnitedHealthcare Medicare Solutions, through the use of Web links and logos, must comply with the Centers for Medicare & Medicaid Services (CMS) marketing guidelines and UnitedHealthcare company standards. **Submitting your website to the Compliance Questions mailbox does not register your site.** Please follow the process listed below for registering your website.

There is no need to wait for review or approval before using your website. UnitedHealthcare will contact you if there are compliance issues that need to be addressed, which could involve revisions to the site.

Process for Registering Your Website – Refer to the Agent Website Job Aid for additional information

1. Register your website by sending the following information to Agent_Marketing_Requests@uhc.com:
 - Agent name:
 - Agent Type (ISR, ICA or EDC):
 - Agent writing number:
 - Agency name:
 - Phone number:
 - Email address:
 - NMA or FMO name (if applicable):
 - NMA or FMO writing number (if applicable)
 - NMA or FMO principal name (if applicable)
 - Agent facing or consumer facing website (select one):
 - Website URL:

Logo and Branding – Refer to the Agent Website Job Aid for additional information

1. Ensure your website is live
2. Ensure all URLs that contain a reference to UnitedHealthcare are registered with UnitedHealthcare. It's easy! (See above)
3. Use appropriate carrier logos (ONLY UnitedHealthcare Medicare Solutions brand and logo allowed)
 - When submitting a request to use the UnitedHealthcare Medicare Solutions logo, you must submit the same agent information that is listed above, to Agent_Marketing_Requests@uhc.com
4. Use of AARP logo is **NOT PERMITTED**
5. Ensure the AARP Web banner is used correctly (*For those who are permitted to use the banner*)

Agent Titles – Refer to the Agent Marketing and Generic Materials job aid for additional information

1. Use correct and allowable agent titles in order to properly represent yourself to Medicare-eligible consumers
2. UnitedHealthcare has approved the following agent titles based on the agent's sales channel:
 - ISR: Licensed Sales Agent, Licensed Sales Representative, Sales Agent, Sales Representative, or UnitedHealthcare Medicare Solutions Sales Representative

- ICA: Independent Sales Agent, Independent Sales Representative, Licensed Sales Agent, Licensed Sales Representative, Sales Agent, or Sales Representative
- External Distribution Channel (EDC) Agent: Independent Sales Agent, Independent Sales Representative, Licensed Agent, Licensed Sales Agent, Licensed Sales Representative, Sales Agent, or Sales Representative (their National Marketing Alliance (NMA)/Field Marketing Organization (FMO) name may be added if desired)
- Institutional Sales Agents (Selling the Institutional Special Needs Plan Only): Sales Account Manager

Language and Content – Refer to the Agent Marketing and Generic Materials job aid for additional information

1. Use the terms Medicare/CMS/Department of Health & Human Services (DHHS) correctly
2. Use the terms Private/Proprietary Info / i.e. Agent contracts, Agent commission info, etc. correctly
3. **Do not** provide inaccurate/misleading /misrepresentation of information
4. **Do not** advertise events for the next AEP online prior to October 1

Electronic Business Reply Card (BRC) – Refer to the Agent Website Job Aid for additional information

1. Ensure the scope of product that governs the PTC is included (e.g., Medicare Advantage, Part D plans, Medicare supplement insurance)
2. Ensure method of contact is included (e.g., phone, email)
3. **Must include** the following disclaimer:
“A sales agent may mail, call or e-mail as a result of completing the information to discuss Medicare Advantage, Prescription Drug Plans or Medicare Supplement Insurance.”
4. **Do not** require any consumer contact information other than name and mailing address and/or email
5. **Do not** ask for Date of Birth (DOB)
6. **Do not** request medical or prescription drug history

Disclaimers – Refer to the Agent Marketing and Generic Materials job aid for additional information

1. Ensure event disclaimers for educational and/or marketing sales events are included
2. Ensure gifts, prize, and/or drawing disclaimers are included

Terms Not Permitted – Refer to the Agent Marketing and Generic Materials job aid for additional information

1. Free – as in reference to plan cost and/or benefits
2. Senior - as the only audience - stating Senior and Medicare Beneficiaries is permissible
3. Entitled (PART A) - stating earned (Part A) is permissible

Plan Specific Information – Refer to the Agent Website Job Aid for additional information

1. **Do not** use inappropriate mention/use of "Medicare Plans" vs MA, PDP, etc.
2. Use of benefit/premium details is **NOT PERMITTED**
3. **Do not** use inappropriate Plan Specific Names (family of plans/full filed plan names), or plan specific info.

Additional Resources

1. CMS 2016 Medicare Marketing Guidelines:
 - Section 40.4 – Prohibited Terminology/Statements
 - Section 70.8 – Prospective Enrollee Educational Events
 - Section 70.9 – Marketing/Sales Events and Appointments
 - Section 70.11.1 – Provider-Based Activities
 - Section 100.6 – Social Media
2. Agent Guide
3. Events Basics Module

Questions

For questions and/or additional information, please send an e-mail to compliance_questions@uhc.com