Sales Policy Job Aid

Agent Website and Social Media Guidelines

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INTRODUCTION

This document describes commonly applicable UnitedHealthcare policies and the Centers for Medicare and Medicaid Services (CMS) requirements for agents conducting Medicare plan business on the internet including, but not limited to; websites and social media platforms, such as such as Facebook, Twitter, LinkedIn, YouTube, blogs, chat rooms, and message boards.

Refer to the "*Agent Created and UnitedHealthcare Toolkit Guidelines*" for guidance pertaining to content development (e.g. describing your business, services and educational information)**.** For information on virtual meetings, email communications or other digital activities, please refer to the current Agent Guide, job aids, and agent communications found on Jarvis here https://www.uhcjarvis.com. UnitedHealth Group employees are subject to corporate guidelines in addition to the contents of this job aid.

For technical questions about the UnitedHealthcare Toolkit (e.g. accessing, finding materials, modifying your profile), or your myUHCagent.com webpage, please contact the UnitedHealthcare Producer Help Desk (PHD) at phd@UHC.com or by phone at 888-381-8581 Mon - Fri 7am - 9pm CT

Any UnitedHealthcare policy or CMS requirement questions not answered by this job aid may be directed to compliance_questions@UHC.com and/or your UnitedHealthcare agent upline or business account manager.

Throughout this document you will see these terms.

"Should" is a best practice and may protect you against compliance infractions.

"**Should not**" means that this activity is inadvisable and may expose you to risk for a compliance infraction

"May" "Can" or "Could" represent a possibility. This includes either an opportunity for you to engage in an activity or a potential risk if you do.

"Must", "Must not", or "Cannot" indicates an that something is absolutely required or prohibited in relation to the activity being discussed**.**

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EXPECTATIONS, MONITORING, AND CORRECTIVE ACTION

Professional Conduct is a "must": You are solely responsible for the content you post online. Always act responsibly, respectfully and professionally. **Do not** use business social media platforms or websites to abuse, use insults, disparaging language, threats or obscenities about consumers, members, colleagues, or business partners. If you are the target of any of these actions, do not engage with the perpetrator, but report such activities to the appropriate authorities.

Be transparent about your role and intentions. Be factual and unbiased in the way you provide information so that the consumer may make a choice that best suits their personal situation.

Do not share or request confidential information, including protected health information (PHI), social security numbers, Medicare/Medicaid IDs, individually identifiable financial or health information through any unsecured platform or website. Refer to the Agent Guide posted on Jarvis for additional information about security requirements.

Website Monitoring: Except for websites owned by agencies contracted with UnitedHealthcare specifically to perform online enrollment, *UnitedHealthcare does not prospectively review or provide approval for agent internet content*. Other UnitedHealthcare contracted agents who create an internet presence to generate leads that may result in a UnitedHealthcare Medicare plan enrollment are expected to adhere to the guidance provided in this document as well as maintain their sites to be current with any updated guidance as communicated by UnitedHealthcare and/or, CMS. All UnitedHealthcare contracted agent business websites and business social media accounts are subject to review and monitoring by UnitedHealthcare.

Corrective Action: UnitedHealthcare will notify website/social media account owners and their UnitedHealthcare agent manager or up-line of any identified non-compliance and assign corrective action with a specified time period to bring the site into compliance. Failure to comply with corrective action may be referred to the Disciplinary Action Committee or subject to progressive discipline including corrective and/or disciplinary action, up to and including termination.

GENERAL REQUIREMENTS

Unless otherwise specified, all requirements in this section apply to *all internet or social media activities that may lead to a UnitedHealthcare Medicare plan enrollment.* Regardless of whether UnitedHealthcare or its affiliates (e.g. "AARP") is mentioned on the website or social media account. Agents may only use a business-based website or social media accounts for this purpose. Using a personal or multi-purpose (i.e. mixing personal and business information) websites or accounts to lead generate is prohibited.

Agent Details: You may post your contact information, agent title, and your business services. Refer to the "Agent Created and UnitedHealthcare Toolkit Materials Guidelines" job aid (available on Jarvis) for additional information on compliant agent titles.

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Educational Content: You may post current basic Medicare information, such as income limits, Part A and/or Part B premium and deductible amounts, Part A and B coverage descriptions, or Part D coverage stage information. Educational content may be posted, but should cite sources, including publication dates as applicable. Update Medicare information as new or annual changes are announced by Medicare to prevent misleading consumers/members when making plan choices.

Announcing Product Offering: You may generally indicate the product types you are authorized to sell. For example:

- Medicare Advantage
- Medicare Advantage Special Needs Plans
- Medicare Supplement Insurance Plan
- Part D Prescription Drug Plans

Generic Materials: You may post agent-created generic materials or advertisements on your business website or social media accounts. Generic materials are free of any plan brand, logo, intellectual property, or plan specific information (such as specific copays or benefits). Refer to the "*Agent Created and UnitedHealthcare Toolkit Materials Guidelines"* job aid (available on Jarvis) for guidance about creating generic materials.

Third-Party Intellectual Property: Avoid using any copyrighted images, video, or audio in any digital content without appropriate permissions as this may subject you to legal action from the owning entity. Guidance for using UnitedHealthcare brands and content are outlined in the section "UnitedHealthcare and AARP Branded Content Requirements".

Hyperlinks: Agents may post links to government website homepages (no subpages) such as www.medicare.gov, www.cms.gov, www.hhs.gov, or www.ssa.gov as permitted by the government websites. Links to other educational websites may be posted as permitted by site's owner. Keep all hyperlinks up-to-date and ensure they are accurate, active, and not broken.

> **Note**: If you list 1-800-MEDICARE or the Medicare TTY number on your agent created business website, you must list the hours and days of operation (i.e. 24 hours a day/7 days a week).

Event Advertising: You may post generic educational and/or marketing/sales event advertisements on your business website and social media accounts. (See the "Agent Created and UnitedHealthcare Toolkit Guidelines" for required disclaimers.)

Interactive Communication Features on Consumer Facing Business Websites: Agent business websites may provide a chat function to direct consumers to an agent. However, conversations must be consumer initiated and there must be a clear statement that the consumer will be connected with a licensed sales agent.

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In addition, the consumer must not be required to provide any contact information in order to use the chat function. Use of the chat function does not constitute Permission to Contact (PTC) in the future.

Interactive Communication Features on Social Media: Agents must not use a business social media platform's interactive functionality to initiate unsolicited contact with consumers and/or members (e.g., writing on a consumer's Facebook wall, or using Facebook messenger to direct message). If contacted by a consumer through these means, the agent may reply with answers to questions asked and should re-direct the consumer to contact the agent via phone, email or compliant online eBRC.

Consumer Contact Information Requests: Agents may create an eBRC (electronic Business Reply Card) on their business website or business Facebook account. *As a reminder, PTC and Scope of Appointment (SOA)* ***are not*** *the same and* ***are not*** *interchangeable. For more information refer to the job aids on Jarvis.*

In addition to the Website and Facebook specific guidance below, refer to the "Agent Created and UnitedHealthcare Toolkit Materials Guidelines" and the "Permission to Contact and Lead Generation" job aids located on Jarvis for eBRC content and use requirements.

eBRCs or Contact Requests for Websites: You may feature a generic electronic Business Reply Card (eBRC), online contact form, or similar section to obtain Permission to Contact (PTC) on your business website.

Note: If your site only solicits for Medicare Supplement plans, and your eBRC does not provide PTC for Part D plans, any leads obtained through that eBRC cannot be utilized for Part D plans or Medicare Advantage plans.

PTC language should be placed close to the form fields on all pages where you request consumer contact information. If using a click through feature, such as a button stating, "*Contact us for a Quote*", then the PTC language should be placed on the first page on which the consumer begins to provide information. The consumer should not have to scroll the page, refer to another page, or click through to another page or field to see the PTC language.

Consumer Contact Information Requests on Facebook: You may create an online contact form on Facebook as part of a ***generic*** advertisement created through the Facebook application. The only branded versions permitted are the Facebook specific pieces that are available to qualified agents on the UnitedHealthcare Toolkit. Using the fields below as indicated may help you remain compliant when creating a Facebook advertisement contact form:

- **Headline window section:** Create a headline statement that clearly indicates the intent of the contact request. Such as, "*Talk to a licensed sales representative*".
- **Description window section:** Along with any generic description message, add a statement to indicate the consumer will be contacted by a plan representative (e.g., licensed sales agent) to discuss Medicare insurance options. Such as, "*Submit your information below and I will contact you about your*

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Medicare coverage options."

- **Add a Question section:** Provide the scope of products that may be discussed. Such as, "*By submitting this form, you agree that a licensed sales representative may contact you about Medicare Advantage, Prescription Drug, and Medicare Supplement Insurance plans*." Use the statement, "***This is a solicitation for insurance***" if only, or also generating leads for Medicare Supplement Insurance plans.
- **Customer Info section:** Select the consumer information to be requested and include the specific contact method(s). We recommend requesting no more than three information pieces.

AGENT FACING WEBSITES

Agent-facing websites are directed to agents for agent recruitment activities, education and communication. Agent-facing websites are often password protected and not open to the public. In addition to the preceding general guidance and the following "UnitedHealthcare and AARP Brand Requirements" agent facing websites:

- Must contain a disclaimer to the effect of: "The information on this website is for agent use only and not intended for use by the general public."
- May include a link to Jarvis www.uhcjarvis.com for agent use.
- Must not have posted any UnitedHealthcare proprietary information (e.g. contracts, reports, job aids…)

USE OF THIRD-PARTY ADVERTISERS AND DEVELOPERS

Before using any entity or vendor not directly contracted with UnitedHealthcare to assist with marketing Medicare plans, UnitedHealthcare contracted agents or agencies must ensure that the entity or vendor employed will abide by all CMS and any other state and federal rules (including but not limited to permission to contact, HIPAA provisions and cross-selling). Activities that may result in the sale of a UnitedHealthcare Medicare plan are subject to UnitedHealthcare policy. Agents will be held accountable for any compliance or policy infraction committed by entities or vendors contracted with, or employed by, the agent or agency. You must verify with UnitedHealthcare any claims by a vendor that the vendor is contracted with UnitedHealthcare.

UNITEDHEALTHCARE AND AARP BRAND REQUIREMENTS

Agent use of AARP and UnitedHealthcare brand, logos, materials and intellectual properties on the internet or social media is limited to use on agent business websites and Facebook accounts and to the extent permitted in this job aid. The UnitedHealthcare contract with AARP does not allow agents to use the AARP brand name/logo in ***any*** *agent-created* materials or content, including reference or tagline such as "Authorized Agent for AARP."

Website and Social Media Domain Names and URLs: UnitedHealth Group, its affiliates, or AARP®'s brand name, any brand derivative, including plan's name or abbreviations (e.g., UHC) may not be used in any domain names and/or URLs.

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Registration requirements: Prior to posting any reference to UnitedHealthcare (including logo) or the permitted AARP assets, you must register your business website(s) and social media. (Registration instructions can be found later in this job aid.)

Plan Sponsor Affiliation (Websites): Only agents who are actively licensed and certified, appointed (if applicable), and have registered their website(s) with UnitedHealthcare may announce their affiliation with UnitedHealthcare on their websites. You may use UnitedHealthcare name, approved logo, and/or hyperlink to the www.uhcmedicaresolutions.com website (homepage only) to announce your affiliation as a contracted agent representing UnitedHealthcare. A request for the approved logo may be submitted with your registration request.

When announcing your affiliation with UnitedHealthcare, follow these guidelines:

- Make sure to use the correct spelling and capitalization of UnitedHealthcare®.
- The first time the UnitedHealthcare brand name is used on any individual webpage, it must be followed by the appropriate trademark symbol "®".

UnitedHealthcare Branded myuhcagent.com: If you have a myuhcagent.com webpage, you may include a link to the webpage on your business website or social media account. Alternatively, you may use a generic image (not UnitedHealthcare or AAPR branded) or generic verbiage as a re-direct hyperlink to your myuhcagent.com webpage.

UnitedHealthcare Medicare Made Clear(R) YouTube Videos: The only use agents may make of these videos on the internet is to link them on their website. If using the "description of the video" text from YouTube, it must be used in full and verbatim. Do not embed or copy the Medicare Made Clear videos onto your website.

UnitedHealthcare and/or AARP Branded Materials: Unless specifically designed for that purpose, you must not post online any UnitedHealthcare Toolkit materials, Sales Material Portal materials and/or any UnitedHealthcare distributed content or materials (email, post mail, information, or training, (provided in-person or virtual)). Nor are agents permitted to use these materials to create content or materials for posting.

For Facebook only, UnitedHealthcare has provided the following on the UnitedHealthcare Toolkit:

UnitedHealthcare branded Facebook assets are limited to agents in the ICA, IMO, and ISR distribution channels and EDC agents recognized as Premier Platinum Agents.

AARP branded Facebook assets are limited to Authorized to Offer Elite (also known as "A2O Level 2") agents in any channel.

Access to the Facebook assets on the UnitedHealthcare Toolkit is granted to qualified agents after registration of their Facebook account. To learn more about the Premier Agent or A2O programs, please contact your agent manager or upline, or the UnitedHealthcare Producer Help Desk (PHD).

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UnitedHealthcare Logo Use

You may only use the currently approved UnitedHealthcare logo on your business website.

When registering your site, you may include a request for the UnitedHealthcare logo. You must not copy, paste, or use a logo from this job aid; other branded materials, or logos obtained from non-approved sources. The provided logo file is only approved for use on an agent created business website and cannot be used in any other manner than in the instructions provided with the file.

Requests to use any other logo and/or brand, plan and/or product name, such as AARP or "UnitedHealthcare MedicareComplete", will be denied.

A20 Web Banner Use

Aside from the Facebook assets on the UnitedHealthcare Toolkit, the only other permitted use of AARP on the internet by agents is the A2O web banner. The A2O web banner:

- May only be used by Authorized to Offer Elite (also known as "A2O Level 2") agents
- May only be used on agent websites.
- Must be used in the manner for which it was created and must not be used in any other way.

Qualified agents may order the approved A2O web banners from the UnitedHealthcare Toolkit. The steps for obtaining the A2O web banner and instructions for its use are provided through the UnitedHealthcare Toolkit. The A2O web banner will link consumers to an informational landing page hosted by AARP.

Failure to follow the instructions you received with either the UnitedHealthcare Logo or AARP Authorized to Offer web part will be considered a violation of your contract with UnitedHealthcare and subject to disciplinary action.

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REGISTRATION, SUBMISSION, AND PUBLISHING GUIDELINES

All business websites and/or business social media accounts that post the UnitedHealthcare brand name, logo, hyperlink, and/or branded resources must be registered with UnitedHealthcare. Incomplete registrations will not be processed and returned with a request for the required information.

If your business website and/or business social media account adheres to the guidelines outlined in this document and you submitted a complete registration, you may announce your affiliation with UnitedHealthcare on your website and/or social media account upon confirmation from UnitedHealthcare that your registration was received.

Any new URLs or websites on which you wish to feature the UnitedHealthcare brand name, logo, hyperlink, and/or branded resources must be registered with UnitedHealthcare. Use the same process as is used for the initial website or social media account registration.

Acknowledgement of your business website or social media account registration is not an approval by UnitedHealthcare. *UnitedHealthcare does not prospectively review and approve agent business websites or business social media accounts.* You are responsible for the compliance of any business website or business social media account.

Registration Form

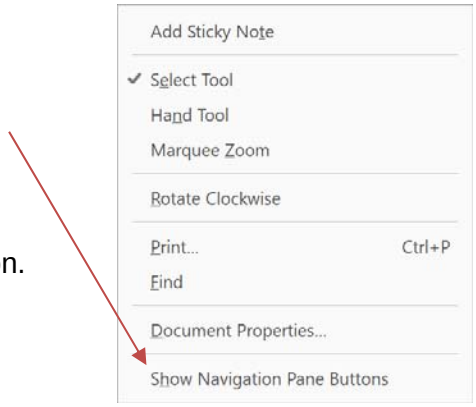
The registration form is attached to this document which may be accessed by clicking the "paperclip" symbol on the left side of the Adobe Acrobat application window. The paperclip symbol looks like this:

If you do not see the paperclip symbol, you may be able find it by right clicking your mouse to make the window shown to the right pop up.

Click on "Show Navigation Pane Buttons" which then should make the paperclip symbol appear on the left side of the Adobe Acrobat application window.

Click on the paperclip symbol to see the attached form.

Double click the form to open it and follow the instructions for completion.



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WEBSITE AND SOCIAL MEDIA DEVELOPMENT CONSIDERATIONS

UnitedHealthcare cannot provide you with either technical support or content development beyond what is made available in this document or on the UnitedHealthcare Toolkit. However, we have made observations about best practices for agent website and social media accounts. Therefore, we're providing the following questions to ask yourself regarding your website or social media account.

Site Content

- ☐ Am I providing factual, non-biased information that enables the consumer to make a choice based on the consumers personal needs, not my personal preferences?
- ☐ Is the content clear, accurate, up to date and not misleading as to who I am, my role, and what I may provide to consumers?
- ☐ Do I want to re-create information in my own words or link to existing resources, such as the current CMS publications like "Medicare & You"?
- ☐ Are my explanations making information easier to understand without sacrificing accuracy?
- ☐ Am I trying to use my website as a substitute for personal one-on-one consumer education? (Doing so is not a best practice.)
- ☐ If you have other product (e.g. non-Medicare plan) information on your site: Have I organized my site so that consumers as non-experts in insurance are likely to be confused about whether the non-Medicare plan information applies to Medicare plans?

Site Creation and Maintenance

- ☐ Am I committed to reviewing my site at least annually?
- ☐ Am I committed to making updates if information becomes obsolete throughout the year?
- ☐ Can I easily make changes if needed?
- ☐ Do I need to engage a website developer?

Site Functionality

- ☐ Do all links work? Or, will broken, or outdated hyperlinks lead to consumer frustration?
- ☐ Are the site's functions going to really work for my business practices? For example, if you have a chat function on your website, can you respond immediately?
- ☐ Is my site secure enough to ensure that consumers communicating any HIPAA covered information will have that information protected? (Requesting HIPAA covered information is not advised.)
- ☐ Do all places that request consumer information have the appropriate PTC language?

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RESOURCES

Agent Guide

The Agent Guide provides guidance on CMS regulations and UnitedHealthcare rules, policies, and procedures. It is available on **Jarvis**.

Sales Policy Job Aids (available on Jarvis)

Agent Created and UnitedHealthcare Toolkit Materials Guidelines Job Aid

Agent Events Job Aid

Permission to Contact and Lead Generation Job Aid

Prescription Drug Coverage Reference Job Aid

Scope of Appointment Job Aid

Compliance Questions

Submit policy compliance-related questions to compliance_questions@uhc.com.

Jarvis

www.uhcjarvis.com.

For assistance accessing or using the Jarvis website or the UnitedHealthcare Toolkit, contact the Producer Help Desk (PHD) at phd@uhc.com or 1-888-381-8581.

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