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 contracted 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.

Any online activities that may result in the sale of a UnitedHealthcare Medicare plan are subject to UnitedHealthcare policy.

The guidance in this document is specific to agent website and social media activities. Other information about content creation, permission to contact and security requirements may apply depending on elements created or used in these media. Guidance for other topics is also found on Jarvis, including, but not limited to, the "Agent Guide".

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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: *UnitedHealthcare does not prospectively review or provide approval for agent internet content*. 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 and maintain their sites to be current with any updated guidance as communicated by UnitedHealthcare, federal, state and any local requirements. All UnitedHealthcare contracted agent business websites and business social media accounts used to generate business on behalf of UnitedHealthcare are subject to monitoring by UnitedHealthcare.

UnitedHealthcare or AARP Services, Inc. (ASI) may conduct internet searches for noncompliant activity.

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 to bring the site into compliance.

Most corrective action assigned will require immediate changes to bring the website or social media account into compliance. Coaching and remediation modules may be also assigned. Timely responsiveness is key to avoid escalation to the next level of corrective action.

Failure to comply with corrective action within the required timeframes may be referred to the Disciplinary Action Committee or subject to progressive disciplinary action including corrective and/or disciplinary action, up to and including termination.

Use of Third-Party Advertisers and Developers: Regardless of whether a third-party is used to develop a website or maintain an account, agents are solely responsible for the compliance of their website or social media.

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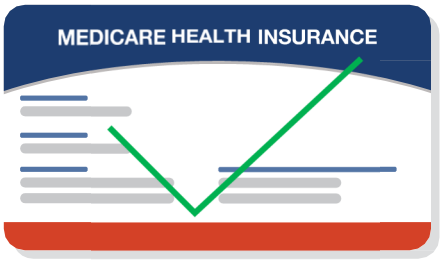
GENERAL REQUIREMENTS

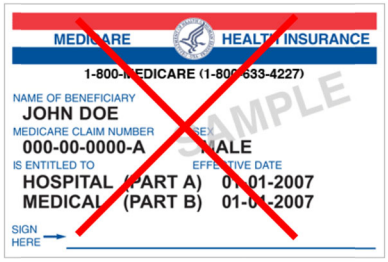
Unless otherwise specified, all requirements in this section apply to ***all*** *internet or social media activities that may lead to a UnitedHealthcare Medicare plan enrollment.* Regardless of whether UnitedHealthcare is mentioned on the website or social media account. Agents must only use business-based 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.

URLs with "Medicare": As with business names, use of "Medicare" in an agent's URL requires the owner to exercise caution to avoid misleading consumers. UnitedHealthcare expects agents to consult their own legal counsel for advice on federal, state and local laws prior to using "Medicare" in a URL.

"UnitedHealthcare" *or any derivation thereof (such as "UHC")* and/or "AARP" use in URLs, account names or domains is strictly prohibited.

Medicare Card Images: Agents are responsible for obtaining CMS approval for each use of a Medicare card image. Graphic representations of the Medicare card do not require CMS approval. UnitedHealthcare will not submit an agent's request to CMS on their behalf. Proof of approval may be required if a site is found to have a Medicare card image during monitoring activities.





Agent Details: You may post your contact information, a compliant agent title, and your business services. Refer to the Agent Guide (available on Jarvis) for additional information on compliant agent titles. You must not mislead the consumer regarding your primary role as an insurance agent or agency.

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
- Medicare Insurance Plans

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Educational Content: An agent owned and/or operated website may provide high level educational Medicare information. Do not use a website as a substitute for the education agents must provide a consumer prior to plan enrollment. Keep information current, accurate and cite information sources.

Marketing Material: Only websites owned and operated by eAlliance agencies, Telephonic Addendum agencies and NMA agencies are permitted to create content that meets the CMS definition of marketing material. Refer to the Agent Guide for definitions of marketing material and communications material.

Interactive Communication Features on Consumer Facing Business Websites: Agent business websites may provide a chat feature to direct consumers to an agent. Contact using a chat feature must be consumer initiated, and there must be a clear statement that the consumer will be contacting a licensed sales agent. Chat forms gathering consumer contact information must have a permission to contact statement (see eBRCs).

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 must redirect the consumer to contact the agent via phone, email or compliant online eBRC.

Forms Requesting Consumer Contact Information: 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. For more information refer to the Agent Guide on Jarvis.* Referral forms used to collect consumer contact information from someone other than the prospective client are not permitted for Medicare plans.

eBRCs for Websites: You may feature an 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 must be close to the form fields on all pages where consumer contact information is requested. If using a click through feature, such as a button stating, "*Contact us for a Quote*", the PTC language must be placed on the first page on which the consumer begins to provide information. The consumer must not have to scroll the page, refer to another page, or click through to another page or field to see the PTC language.

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Example of a compliant eBRC for a website



Consumers provide first and last name.
Note agents must only contact the individual identified. Permission to contact does not extend to any other individual who may share the phone number or email address with the individual listed.

The agent can obtain multiple methods of contact such as phone, email, or postal address.

Note: if the individual leaves a field blank, the agent is not permitted to use other sources, e.g. internet, to obtain missing or incorrect information.

The entity to whom the individual is granting permission must be identified.

Method of contact matches to the fields provided above.

Products the individual is permitting the agent to contact them about must be identified.

Note: Products can be individual types, such as this example, or categories such as "Medicare insurance plans".

This disclaimer is required when the scope of products includes or could include Medicare Supplement Insurance.

Consumer Contact Information Requests on Facebook: You may create an online contact form on Facebook. Any lead generating ad or contact form must display a comprehensive permission to contact statement that is clearly visible. Note: UnitedHealthcare does not provide technical support for social media operations or functions, only the compliance requirements that must be met.

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.

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Links to other educational websites may be posted as permitted by the 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, at least once, the hours and days of operation (i.e., 24 hours a day, 7 days a week).

Event Advertising: You may post educational and/or marketing/sales event advertisements that meet CMS' definition for "communications" on your business website and social media accounts. Refer to the Agent Guide posted on Jarvis for disclaimer requirements and other rules applicable to events.

Third-Party Intellectual Property: Do not use any copyrighted images, video, or audio in any digital content without appropriate permissions. Guidance for using UnitedHealthcare's name, logo, and content are outlined in the section "*UnitedHealthcare and AARP Branded Content Requirements*".

Consumer Testimonials: Testimonials about UnitedHealthcare or UnitedHealthcare plans are not permitted. If you choose to use consumer testimonials regarding your agency, it is your responsibility to ensure that your use of a testimonial complies with applicable laws, including the obligation to obtain any necessary consumer authorization to use their testimonial.

AGENT FACING WEBSITES

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

- Regardless of password protection and/or not public-facing, 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 contain any UnitedHealthcare proprietary information (e.g. contracts, reports, job aids)
- Must not post any information about UnitedHealthcare beyond indicating affiliation with UnitedHealthcare.

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UNITEDHEALTHCARE AND AARP BRAND REQUIREMENTS

You may use the "UnitedHealthcare®" name, approved logo (provided upon request and registration), and/or hyperlink to the https://www.uhc.com/medicare/ website homepage to announce your affiliation as a contracted agent representing UnitedHealthcare. Agent use of AARP and UnitedHealthcare brands, logos, materials and intellectual properties on the internet or social media is only permitted as stated in this job aid.

Website and Social Media Registration: Agents wishing to announce their affiliation with UnitedHealthcare must be actively contracted with UnitedHealthcare and register their website with UnitedHealthcare. To register your website, send an email with a subject line of website registration to Compliance_Questions@UHC.com. Provide your writing ID number and a complete URL for each webpage where an affiliation with UnitedHealthcare will be announced. Typically, this starts with "https://www". When registering your website, you may request a copy of the approved UnitedHealthcare logo.

Acknowledgement of your registration request does not indicate UnitedHealthcare review and approval of your website.

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 registered trademark symbol "®".
- The logo must be used as provided and not be altered in any way except making it smaller or larger, keepings its proportions intact.
- Only logos provided for a registered agent website may be used. No other logo will be approved. Do not obtain any UnitedHealthcare logo by copying it from another material or internet source.

No other content about UnitedHealthcare as a company or its services is permitted.

UnitedHealthcare Medicare Made Clear(R) YouTube Videos: Agents are permitted to directly link to UnitedHealthcare Medicare Made Clear YouTube videos from their owned and operated website. If using the "description of the video" text from YouTube, it must be used in full and verbatim. Embedding or copying the Medicare Made Clear videos onto your website is prohibited.

UnitedHealthcare and/or AARP Branded Materials: Unless specifically designed for use on an agent website or social media account, you must not post online any UnitedHealthcare Agent Toolkit materials, Sales Material Portal materials and/or any UnitedHealthcare distributed content or materials (email, postal mail, information, or training, (provided in-person or virtual)). Agents are prohibited from using UnitedHealthcare copyrighted materials in whole or in part to create content or materials for posting.

UnitedHealthcare Branded myuhcagent.com: If you have a myuhcagent.com webpage, you may include a link to it on your business website or social media account. Alternatively, you may use a generic image (not

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UnitedHealthcare or AARP branded) or generic verbiage as a redirect hyperlink to your myuhcagent.com webpage.

A20 Web Banner Use

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

- By Authorized to Offer Elite (also known as "A2O Level 2") agents.
- On registered agent websites.
- In the manner for which it was created.

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

No other content describing AARP or the services they provide is permitted.

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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WEBSITE AND SOCIAL MEDIA DEVELOPMENT CONSIDERATIONS

UnitedHealthcare cannot provide you with 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

- ☐ Do I have all the appropriate disclaimers? (e.g., Permission To Contact, meeting disclaimers where appropriate…)
- ☐ Is my content free of what CMS would define as "marketing"?
- ☐ 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?
- ☐ 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 and discouraged by UnitedHealthcare.)
- ☐ 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?

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 strongly discouraged by UnitedHealthcare.)

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RESOURCES

Agent Guide

Available on Jarvis, the Agent Guide provides guidance on CMS regulations and UnitedHealthcare rules, policies, and procedures.

Sales Policy Job Aids (available on Jarvis)

Agent Created and UnitedHealthcare Toolkit Materials Guidelines Job Aid

Permission to Contact and Lead Generation Job Aid

Scope of Appointment Job Aid

Compliance Questions

Submit UnitedHealthcare policy or 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.

For technical questions about the UnitedHealthcare Agent 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.

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