Sales Policy Job Aid

Agent Website and Social Media Guidelines
Guideline Scope

The guidelines, rules, tips and tools in this document are intended to make it easier for you to promote your affiliation with the UnitedHealthcare organization while complying with all existing UnitedHealthcare brand, logo, brand imagery and trademark policies.

The guidelines apply to all agents (employee and non-employee) and External Distribution Channel (EDC) agencies (in this document agencies and agents are collectively referred to as “agent” or “you”).

Some elements in this job aid only apply to agent facing websites, while all other elements apply to both agent facing and consumer facing websites.

This job aid does not include comprehensive compliance guidance on all affiliated regulations and policies. You may refer to your respective Agent Guide and/or Sales Policy job aid to obtain applicable compliance information.
Consumer Facing Business Websites

Consumer facing business websites are directed to any consumer, are often used to market services, and may contain general educational content about Medicare.

Agents must register their agent created business website(s) if it contains the UnitedHealthcare company name, logo, and/or a hyperlink to the www.uhcmedicaresolutions.com website homepage. (Registration instructions can be found later in this job aid.) Agents must adhere to all regulations, policies, and procedures, such as guidelines on agent-created materials and permission to contact.

Website URL/Domain Naming

Domain names and/or URLs must not contain any UnitedHealth Group brand (or affiliate) company, product, or plan name or brand element (e.g., UHC) or any AARP® name or brand element.

UnitedHealthcare will not evaluate an agent website domain name or URL for the purpose of providing approval. Agents are responsible for complying with any applicable regulations or rules. While you may submit proposed domain names or URLs to compliance_questions@uhc.com, UnitedHealthcare will only advise from a risk perspective based on guidance and previous CMS interpretations.

Using “Medicare” in your website domain name and/or URL

CMS guidance states that: It is prohibited for any person to use words or symbols, including ‘Medicare,’ ‘Centers for Medicare & Medicaid Services,’ ‘Department of Health and Human Services,’ or ‘Health & Human Services’ in a manner that would convey the false impression that the business or product mentioned is approved, endorsed, or authorized by Medicare or any other government agency.

You may want to seek independent legal advice regarding potential risks of using “Medicare” or a similar word in your website domain name and/or URL.
Plan Sponsor Affiliation

Agents must be licensed and contracted, appointed (if applicable), and certified with UnitedHealthcare in order to announce their affiliation, display the UnitedHealthcare brand name and/or logo, and/or hyperlink to the www.uhcmedicaresolutions.com website homepage.

Agents may use the UnitedHealthcare name and/or approved logo to announce their affiliation as a contracted agent representing UnitedHealthcare. You may request the approved logo during the website registration process.

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.

Agents must not display any AARP logo, brand, or product or plan name with the exception that Authorized to Offer (A2O) AARP Medicare Plans Level 2 agents may display the A2O web banner on their consumer-facing website. No other use of the AARP logo or brand is allowed on agent business websites.

Bottom Line: Beyond the approved plan sponsor affiliation use, agent created content on a business website cannot use the UnitedHealthcare or AARP brand name or logo.

Announcing Product Offering

Agents may indicate the product types they are authorized to offer in a general way. For example:

- Medicare Advantage
- Medicare Advantage Special Needs Plans
- Medicare Supplement Insurance Plan
- Part D Prescription Drug Plans
Agents must not publish specific plan names for any product in the UnitedHealthcare Medicare portfolio, including Medicare Advantage plans, Special Needs Plans, Medicare Supplement Insurance plans, and prescription drug plans. Examples include UnitedHealthcare® MedicareComplete Choice®, UnitedHealthcare MedicareComplete, and UnitedHealthcare Dual Complete.

**Website Content Guidelines**

**UnitedHealthcare Branded Marketing or Plan Materials**

Agents **must not:**

- Post any UnitedHealthcare branded marketing and plan materials, including product descriptions and benefits.
- Post or reproduce UnitedHealthcare branded materials that were obtained on the UnitedHealthcare Toolkit, including any materials used to advertise educational or marketing/sales events.
- Post or reproduce any UnitedHealthcare proprietary or confidential information.
- Contain a link to AARPMedicarePlans.com website.

Agent business websites **may** contain a link to the [www.uhcmedicaresolutions.com](http://www.uhcmedicaresolutions.com) home page (only), where consumers can then navigate to plan descriptions and details.

**Prohibited Terminology, Misleading, or Inaccurate Information**

Agents must not post prohibited terminology, misleading, or inaccurate information. For example, but not limited to:

- Agents must not post content that is materially inaccurate, misleading, or otherwise make misrepresentations or could confuse beneficiaries.
  - For example, agents must not identify a Medicare Supplement Insurance plan as a Medicare Advantage plan or feature information about Medicare Advantage in a section designated for information about Medicare Supplement Insurance plans or vice versa.
• Agents must not discriminate based on race, ethnicity, national origin, religion, gender, sex, age, mental or physical disability, health status, receipt of health care, claims experience, medical history, genetic information, evidence of insurability, or geographic location.
  o For example, agent must not state or imply that plans are only available for “seniors”, rather than to all Medicare eligible individuals.
• Agents must not use unsubstantiated absolute or qualified superlatives or pejoratives.
  o For example: Unsubstantiated qualified statements (e.g., “one of the best provider networks” or “the largest health plan”) or unsubstantiated absolute statements (e.g., “UnitedHealthcare is the best” or “CMS recommends UnitedHealthcare”).
  o Agents must substantiate statements on their website and should cite sources as applicable.
  o Note: Unsubstantiated absolute and/or qualified superlatives may be used in logos/taglines.
• Agents must not use the term “free” to describe a zero-dollar premium, reduction in premiums (including Part B buy-down), reduction in deductibles or cost sharing, low-income subsidy (LIS), and cost sharing for individuals with dual eligibility.
• Agents must not feature misleading or broken links.

Plan Benefit and Cost Information
Agents must not post any plan benefit or cost information. In addition, an agent business website cannot link or be fed data from any UnitedHealthcare or affiliate website.

Generic Materials
Agents may post agent-created generic materials or advertisements on their business website. Refer to the Agent Created and Toolkit Materials Guidelines job aid (available on Jarvis) for details related to generic materials.
Educational Content

Agents 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 state information. Agents may feature educational content, but should cite sources, including publication dates. However, the Medicare information must be updated as new annual changes are announced by Medicare to prevent misleading consumers/members when making plan choices.

Event Advertising

Agents may post generic educational and/or marketing/sales event advertising on their business website. Advertisements or invitations to marketing/sales events must include the following disclaimer (verbatim):

- “For accommodations of persons with special needs at meetings call <insert phone number and TTY number>.”

Educational events must be advertised or promoted as educational or in a way that would lead consumers to believe that it is explicitly for educational purposes.

Promoting a nominal gift: There must also be a disclaimer that there is no obligation to enroll, for example:

- “Eligible for a free drawing, gift, or prizes with no obligation to enroll” or
- “Free gift without obligation to enroll”.

Agent Contact Information

Agent contact information may be posted. Refer to the Agent Created and Toolkit Materials Guidelines job aid (available on Jarvis) for additional information on compliant agent titles.
Consumer Contact Information Requests

Agents may feature a generic electronic Business Reply Card (eBRC) or similar section to obtain consumer contact information on their business website. Permission to Contact (PTC) is permission given by the consumer to be called or otherwise contacted by a representative of UnitedHealthcare for the purpose of marketing a UnitedHealthcare Medicare product, including any Medicare Advantage (MA), Prescription Drug Plan (PDP), or Medicare Supplement insurance plan. PTC is limited in scope to the products implicitly or explicitly identified in the PTC mechanism.

Implicitly identified means the PTC mechanism includes statements or options that lead the consumer to believe they will be contacted to discuss Medicare insurance options, such as “Call me about my health care coverage options” or the contact information page clearly on a website related to health insurance or Medicare insurance options (agents must provide proof of website scope of products if requested). Explicitly identified means the PTC mechanism includes exact individual product types such as Medicare Advantage, Part D Plans, or Medicare Supplement insurance or refers to options collectively (e.g., Medicare Insurance options).

An eBRC must follow the same guidelines as a paper BRC (refer to the Agent Created and Toolkit Material Guidelines job aid for additional details). Below are a few of those guidelines to pay close attention to. An eBRC or electronic request for consumer contact information:

- May indicate that fields on the eBRC or consumer contact information request form are required in order to be able to submit the form.
- Must not contain any high-pressure or scare-tactic statements, such as “do not delay,” “reply immediately,” “response time is limited,” “required,” or “needed to ensure delivery.”
- Must not contain any request for the consumer’s date of birth, medical conditions, current medications, etc.
  - Note: For Medicare Supplement insurance plans only, when requesting consumer information for a rate quote, the request may include a request for a date of birth, zip
code, Part B effective date, Part A effective date, gender, and requested effective date. However, requesting the consumer information for a Medicare Supplement insurance rate quote must not be used as a tactic to convert the information into a lead for MA or PDP products.

- May ask if a consumer is Medicare eligible.
- Generic eBRC or lead cards that include Medicare Supplement plans (implicitly or explicitly) must include the disclaimer, “This is a solicitation for insurance”.

As a reminder, PTC and Scope of Appointment (SOA) are not the same and are not interchangeable. Having a SOA form does not provide PTC and vice versa.

In addition, telephonic contact is prohibited if the consumer did not provide a telephone number or the telephone number provided is invalid or incomplete. For example, you must not search the internet or a phone directory in order to find a telephone number.

eBRCs or consumer contact information requests used as PTC must be retained and available to UnitedHealthcare upon request for the remainder of the selling year plus 10 additional years.

As a reminder, you must not ask for or accept referrals (i.e. name and contact information) from a consumer or offer any incentives as an inducement for referrals. In the absence of documented PTC, you must not telephone, text, or email a consumer based on a referral.

Refer to the Permission to Contact and Lead Generation job aid (available on Jarvis) for additional information.

**Interactive Communication Features on Consumer Facing Business Websites**

Agent business websites may provide a chat function to direct consumers to an agent. However, the consumer must initiate the conversation and the feature must clearly state that the consumer will be connected with a licensed sales agent. In addition, the consumer must not be required to provide any contact information in order to use the chat function and use of the chat function does not constitute Permission to Contact (PTC) in the future.
Miscellaneous Guidelines for Consumer Facing Business Websites

May I feature the UnitedHealthcare Medicare Made Clear™ YouTube videos on my business website?

Agents may include a link to the Medicare Made Clear branded content that may be available on YouTube. You may include the text the channel uses as the “description of the video.” However, the descriptive text must be used in full and must be used verbatim.

You must not embed or copy the Medicare Made Clear videos onto your business website.

May I include hyperlinks to government websites?

Agents may post links to government website homepages (only) such as www.medicare.gov, www.cms.gov, www.hhs.gov, or www.ssa.gov as permitted by the government websites. Agents may post links to other educational websites as permitted by the educational websites. Agents must keep hyperlinks up-to-date and ensure the hyperlinks are usable 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).

May I include a link to my UnitedHealthcare branded myuhcagent.com webpage?

UnitedHealthcare makes the UnitedHealthcare branded webpage available for select ICA agents. ICA agents may contact their local UnitedHealthcare sales leadership for additional information including how to request a myuhcagent.com webpage.

An ICA agent with a myuhcagent.com webpage may include a link to their myuhcagent.com webpage on a separate business website. However, you must not feature the direct URL on the separate business website. You must use an image (non-UnitedHealthcare branded) or generic verbiage as a re-direct hyperlink to your myuhcagent.com webpage.
Brand and Logo Usage

Examples are for display purposes only. Actual logo or images may vary

Agents may only use on their business website the currently approved UnitedHealthcare logo. Only logo files provided by UnitedHealthcare are compliant. As of 2/1/18, the approved logo does not contain the “Medicare Solutions” tag line and does not contain the registration mark.

Upon registration or included in your business website registration submission, you may request an approved UnitedHealthcare logo from compliance_questions@uhc.com. You must not copy, paste, or use a logo from branded marketing materials or obtained from other sources.

Requests to use any other logo and/or brand, plan and/or product name, such as AARP or UnitedHealthcare MedicareComplete, will be denied. All UnitedHealthcare logos are registered trademarks with the United States Patent and Trademark Office. To maintain this status, a logo must not be redrawn or changed in any way. You must not alter or modify the design of the UnitedHealthcare logo.

Clear Space

You must provide clear space around the logo. No graphic element, photo detail, type or background texture must violate the logo clear space.

The preferred clear zone around the logo is equal to the height of the “e” in the UnitedHealthcare logotype. The minimum clear zone is equal to the width of the solid inner band in the U mark.
Size and Shape

Although the size of graphics can vary within websites depending on the size and resolution settings of the screen being used to view the site, the logo’s shape and proportions must not be altered or distorted in any way, such as stretched or squeezed to fit in a certain space.

The logo can vary in size as long as the proportions remain the same.

- The logo must never be smaller than a size that allows for a 30px or 0.25” total height of the U mark.
- Do not tilt, rotate, border, or alter the logo’s color.

Examples of correct logo proportions:

Examples of incorrect logos:
AARP Brand Name and/or Logo Usage Website Guidelines

Agents must not use any AARP brand name and/or logo on their business website except for Authorized to Offer (A2O) Level 2 agents who are permitted to use the A2O Level 2 web banner. 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.”

Authorized to Offer (A2O) Level 2 Web Banner

A2O Level 2 agents may order the approved A2O Authorized to Offer web banners from the UnitedHealthcare Toolkit. After ordering the web banner, agents will receive additional instructions via email on how to receive the A2O Web banner HTML code, which is unique to the agent URL provided. The Authorized to Offer web banner will link consumers to an informational landing page. No other use of the AARP brand name or logo is allowed on agent business websites.

A2O Web Banner and Informational Landing Page Examples
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. 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.”

In addition to the guidelines provided in the consumer-facing section, the following guidelines apply.

- An agent-facing website must not contain any UnitedHealthcare proprietary or confidential information, including UnitedHealthcare agent contracts, commission statements, Agent Guides, Producer Handbooks, job aids, newsletters, or branded Scope of Appointment (SOA) forms.

- An agent-facing website may feature the following pre-approved boilerplate verbiage, which must be used verbatim, to describe in greater detail UnitedHealthcare Medicare plans your agency offers. Each paragraph of verbiage below may be used by itself or with any combination of other paragraphs, as long as you are contracted, licensed, certified, and appointed (if applicable) to sell the described UnitedHealthcare Medicare plans. The verbiage must not be modified in any way. However, the [bracketed] section may be removed if multiple paragraphs are used.

The following pre-approved boilerplate language must not be used on consumer facing websites.
Approved Boilerplate Language Section Starts Here:

**UnitedHealthcare** offers a portfolio of Medicare products and is part of UnitedHealth Group, which delivers innovative products and services to more than 12 million unique individuals. For more than four decades, UnitedHealthcare has served the health care coverage needs of Medicare beneficiaries. UnitedHealthcare serves one out of every five Medicare beneficiaries through a variety of products, including Medicare Advantage plans, Medicare Supplement Insurance plans, and Medicare Part D prescription drug plans.

**Medicare Advantage** plans [offered through UnitedHealthcare] offer all of the benefits covered under Original Medicare and more. Many plans also include Medicare Part D prescription drug coverage. Depending on residency, there may be several Medicare Advantage plans from which to choose, including HMO, POS, PPO and PFFS plans.

- **Health Maintenance Organization (HMO)** plans enable members to receive care through a network of contracted local doctors and hospitals that coordinate their care. Some plans do not require referrals for specialty care.

- **Point-of-Service (POS)** plans include all of the features of HMO plans plus the ability to go outside the contracted network for certain health care services, typically at a higher cost. POS plans offer open access to providers with no referrals needed.

- **Preferred Provider Organization (PPO)** plans give members access to a network of contracted local doctors and hospitals, but also allow them the flexibility to seek covered services from physicians or hospitals outside of the contracted network, typically at a higher cost. Members do not need a referral for specialty care.
• **Private Fee-for-Service (PFFS)** plans give members the freedom to receive care from any Medicare-approved provider who agrees to accept the plan’s terms and conditions of payment. Referrals are not needed for specialty care.

**Medicare Advantage Special Needs Plans** [offered through UnitedHealthcare] provide health care coverage for people with a qualifying chronic condition, those who reside in a contracted skilled nursing or assisted living facility or those who qualify for both Medicare and Medicaid (also referred to as “dual eligible”).

**Medicare Supplement Insurance** plans are offered to those enrolled in Medicare Parts A and B. These plans may provide more freedom to choose doctors and hospitals and to see specialists without referrals. Medicare supplement insurance plans also offer nationwide coverage.

**Medicare Part D** plans [offered through UnitedHealthcare] are available in all 50 states and the five U.S. territories. These plans provide a way to add drug coverage to Original Medicare or Medicare Supplement Insurance coverage.

*End Approved Boilerplate Verbiage Section*
Agent Created Business Social Media Platforms

Agent use of business social media platforms, such as Facebook, Twitter, LinkedIn, YouTube, blogs, chat rooms, and message boards as a marketing tool is subject to regulations, policies, and procedures.

Any social media platform used to conduct business on behalf of UnitedHealthcare must be a business account, rather than a personal account.

You Must:

- Register your business social media platform(s) with UnitedHealthcare and adhere to all regulations, policies, and procedures related to marketing and generic materials, including guidelines related to permission to contact. (Registration instructions can be found later in this job aid.)

- Be licensed, contracted, appointed (if applicable), and certified to offer the product on behalf of UnitedHealthcare prior to placing or featuring generic product types on a business social media account.

- Receive approval from your UnitedHealthcare agent manager or up-line on the proposed use and content of your business social media account.

You Must Not:

- Post or publish on a business social media account until you have registered the business social media account for use.

- Use a business social media platforms’ interactive functionality as a means to communicate with consumers and/or members (e.g., writing on a consumer’s Facebook wall, direct message).

- Display the UnitedHealthcare or AARP brand name and/or logo on a business social media account, unless as part of a pre-approved marketing material explicitly developed for social media use.
  - Note: If resources explicitly developed for social media use are made available, your
business social media account must be registered with UnitedHealthcare prior to ordering the resources from the UnitedHealthcare Toolkit.

- Post or discuss any plan or benefit information.
- Display plan sponsor names, plan names, branded marketing materials, or materials and information that are private and/or proprietary to UnitedHealthcare on a business social media account.

**You May:**

- Display generic materials and content on a business social media account. Refer to the Agent Created and Toolkit Materials job aid (available on Jarvis) for information on generic materials. For example:
  - Your name and compliant agent title
  - The types of services you offer
  - The product types you may market/sell
- Display generic event details, such as the date, time, and location of an upcoming marketing/sales or educational event on your business social media account. However, you must not use the platform’s interactive functionality to communicate the details (e.g., writing on a consumer’s Facebook wall, direct message) to a consumer’s social media account.

Note: Any reference to a marketing/sales event on a business social media account must be accompanied by the following disclaimer:

- “For accommodations of persons with special needs at meetings call <insert phone number and TTY number>.”
Professional Conduct Expectations

- You are solely responsible for the content you post online. Always act responsibly and respectfully. **Do not** use ethnic slurs, personal insults, threats of violence, or obscenities. **Do not** use business social media platforms as a place to abuse or express opinions about consumers, members, colleagues, or business partners.

- State the intent of the contact with the consumer and identify yourself as a sales agent.

- Be transparent, always state that your opinions are your own and not of UnitedHealthcare or its affiliates.

- Exercise good judgment before posting. **Do not** share confidential information, protected health information, credit card information, social security numbers, or individually identifiable financial or health information.

Oversight and Monitoring

All agent business websites and business social media accounts may be subject to review and monitoring by UnitedHealthcare. UnitedHealthcare expects agents/agencies and their up-line to monitor agent business websites and business social media for compliance on a routine basis. The business website or business social media owner and their UnitedHealthcare agent manager or up-line will be notified of compliance issues and concerns.

Corrective Action

Agents notified of a UnitedHealthcare compliance issue or concern will be given corrective action and a limited period to correct the issue or address the concern. In some cases, immediate action regarding the website or social media platform may be required. Agents who do not 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.
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
Agent Created and Toolkit Materials Job Aid
Permission to Contact and Lead Generation Job Aid
Scope of Appointment Job Aid

Compliance Questions
Submit compliance-related questions to compliance_questions@uhc.com.

Jarvis

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

UnitedHealthcare Toolkit
Access UnitedHealthcare pre-approved materials through the UnitedHealthcare Toolkit accessible through Jarvis.

Submit UnitedHealthcare Toolkit related questions to the PHD at phd@uhc.com.

For Agent Marketing Request questions, email agent_marketing_requests@uhc.com.
Registration, Submission, and Publishing Guidelines

You must register any agent created* business website that contains the UnitedHealthcare company name, logo, and/or hyperlink with UnitedHealthcare. You must also register any agent created* business social media account with UnitedHealthcare.

You must be licensed, contracted, appointed (if applicable), and certified (in any product type displayed) in order to register an agent business website or business social media account with UnitedHealthcare.

Prior to publishing a business website that contains the UnitedHealthcare brand name, you must submit a complete website registration. Prior to completing a social media registration and activating your business social media account, you must first obtain approval from your UnitedHealthcare agent manager or up-line.

If your business website adheres to the guidelines outlined in this document and you submitted a complete registration, you may publish your website upon confirmation that your registration was received.

After the initial submission, if there are any changes to the existing URLs or any additional URLs that you want to publish, those URLs must also be registered. You may submit those updates through the same registration process you initially followed.

Submission of business website registration or business social media account registration must not be construed as an approval by UnitedHealthcare. No formal review and approval is provided by UnitedHealthcare on agent created* business websites or business social media accounts. Agents are responsible for the compliance of any business website or business social media account.

* Created by the agent or on behalf of the agent by a third-party.
Agent Business Website Registration

To register a business website, you must submit the following information
to compliance_questions@uhc.com prior to publishing:

**Subject Line:** Website Registration - <Agent Name>

**Required Information:** You must include the following information to register a website:

- Agent First and Last Name
- Agent Writing Number
- Owner/Operator of the Business Website
- Website Home URL
- Website Pages URLs that include the UnitedHealthcare Brand Name or Logo
- Date the Website Goes Live

**Additional Requested Information:**

- Agent Party ID (if known)
- Agent Phone Number
- Agent Email Address
- Business or Agency Name (if applicable)
- Agent Channel (if known)
- Up-line Agency Name (if applicable)
- NMA Name (if applicable)
- Date the Website Became Active

**Submit To:** compliance_questions@uhc.com
Business Social Media Registration

You must receive approval from your UnitedHealthcare agent manager or up-line prior to publishing on a business social media account. You must submit the following information to compliance_questions@uhc.com to register your business social media account:

Subject Line: Business Social Media Registration - <Agent Name>

Required Information:
- Agent First and Last Name
- Agent Writing Number
- Name of the Up-line or UnitedHealthcare Agent Manager Approver
- Owner/Operator of the Social Media Account
- Platform to be Used (e.g., Facebook, Twitter)
- Platform Username, Domain Name, or URL (e.g., Facebook username, Twitter Handle)
- Date the Business Social Media Account Goes Live

Additional Requested Information:
- Agent Party ID (if known)
- Agent Phone Number
- Agent Email Address
- Business or Agency Name (if applicable)
- Agent Channel
- Up-line Agency Name (if applicable)
- NMA Name (if applicable)
- Date the Business Social Media Account will Become Active
- Email Address Registered with the Platform

Submit To: compliance_questions@uhc.com