Conflict of Interest

User Guide and FAQ

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United Healthcare

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What is Conflict of Interest (COI)?

A conflict of interest occurs when your interests or activities, or in some cases those of your immediate family member, could affect or appear to affect your decision making on behalf of UnitedHealthcare or because your objectivity could be questioned because of those interests or activities. For the purpose of UnitedHealthcare's disclosure and attestation requirement, your spouse/domestic partner, children, parents, or siblings, including step-relations and in-laws are considered immediate family members but your aunts, uncles, cousins, and grandparents are not.

COI Attestation and Disclosure

Agents, solicitors, and sales leaders contracted by UnitedHealthcare or employed by UnitedHealth Group or its affiliates, who are required to disclose and attest to their conflicts of interest through the UnitedHealthcare sales operations process, must complete their COI attestation and disclosure within 90 calendar days of receipt of the email invitation to do so.

Starting July 1, 2023, individuals will use an automated COI attestation and disclosure process through Sircon (sometimes referred to as PISA). You will no longer complete your attestation through the product certification process. Individuals will receive an email invitation on the date their Party ID (PID) is issued if newly onboarding or on their PID anniversary date.

This user guide will walk you through the process so that you are comfortable with what to expect when you receive your email invitation to complete your COI attestation and disclosure.

Reminders

Promptly complete your COI attestation and disclosure after receiving the email invitation to avoid receiving reminders. At 90 calendars days after receiving the email invitation, non-employee agents (including solicitors) will receive a termination notification if their COI attestation and disclosure has not been submitted. Employees of UnitedHealth Group or its affiliates will be referred to corrective action.

Questions

For questions or assistance related to the conflict-of-interest attestation and disclosure requirement or process, email Agent_COI@UHC.com. Please include a screen shot if you are having difficulty with a particular screen. See also the Frequently Asked Questions section in this document.

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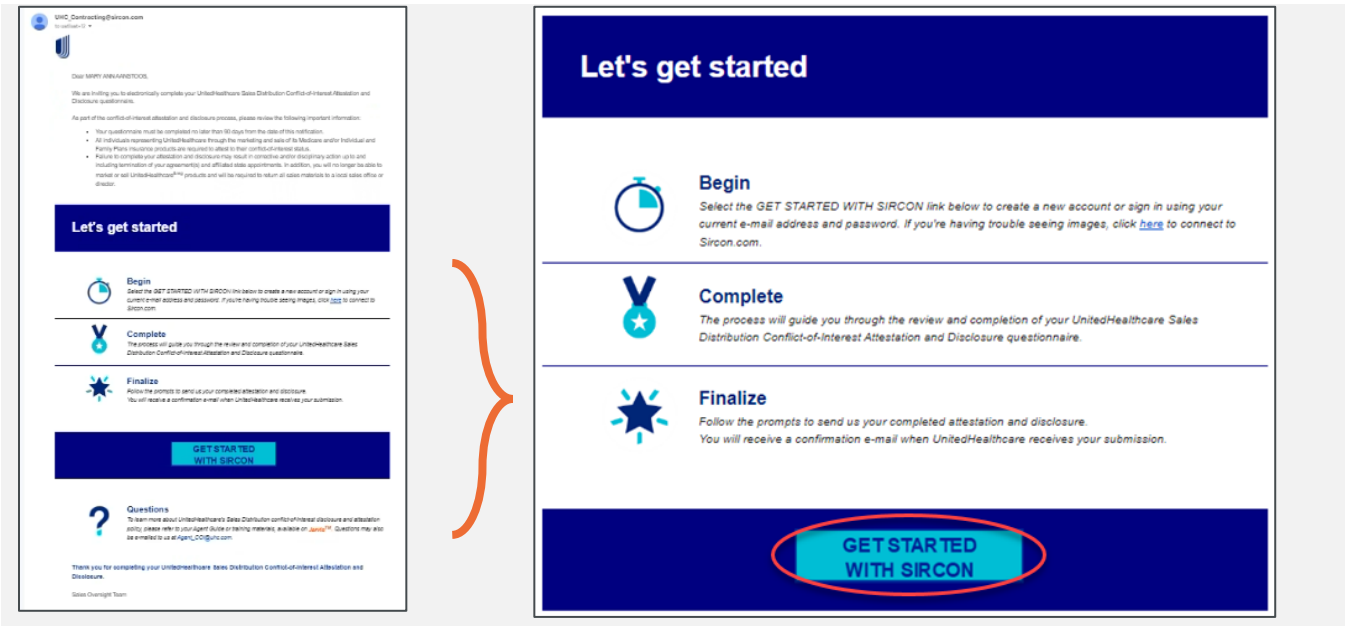
COI Attestation and Disclosure Email Invitation

On your PID anniversary date (or PID issue date for onboarding individuals), you will receive an email invitation to complete your annual COI attestation and disclosure. The email sender will be UHC_Contracting@sircon.com and the email subject line will be “(Your Name), UnitedHealthcare invites you to complete your conflict-of-interest attestation and disclosure requirement”. The email will have a link to the Sircon (https://platform.sircon.com/) system.

- Click **Get Started With Sircon** to begin.

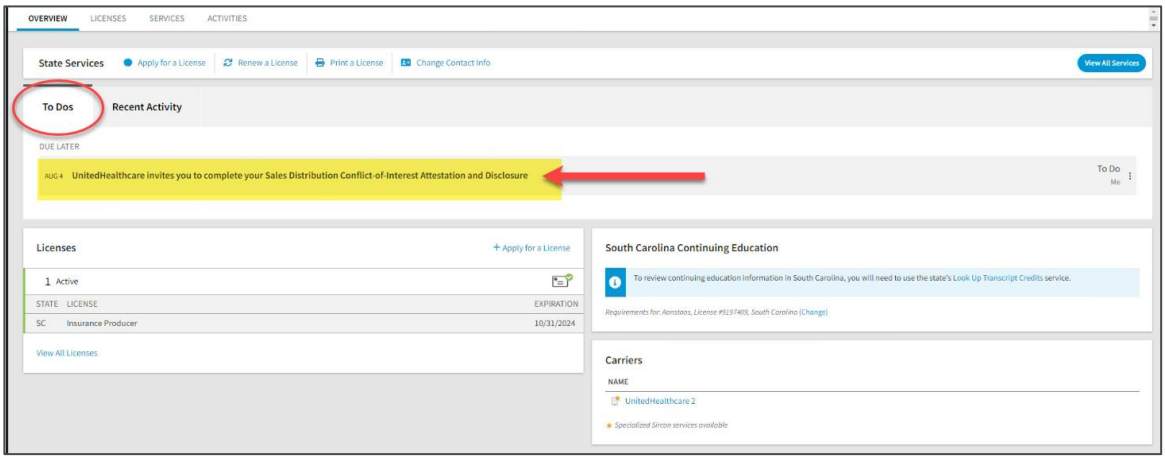


Completing the COI

- Log into Sircon. (For help getting started in Sircon, see the appendix at the end of this guide for instructions.)
- On the Sircon home page, click the **To Do tab** to begin.

Step 1: To Do Tab

- Under the **Due Later** section, the COI attestation and disclosure invitation will be listed.
- Click the **COI task** to begin the process.



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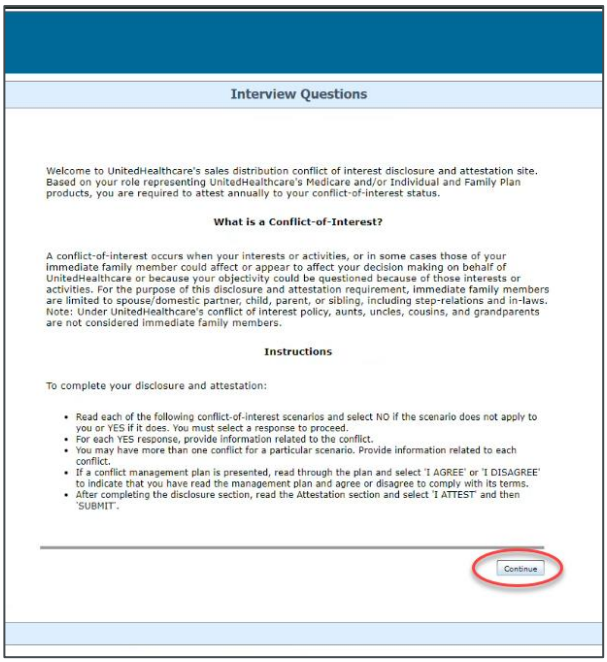
- Review the information and instructions.
- Click **Continue**



Interview Questions

Welcome to UnitedHealthcare's sales distribution conflict of interest disclosure and attestation site. Based on your role representing UnitedHealthcare's Medicare and/or Individual and Family Plan products, you are required to attest annually to your conflict-of-interest status.

What is a Conflict-of-Interest?

A conflict-of-interest occurs when your interests or activities, or in some cases those of your immediate family member could affect or appear to affect your decision making on behalf of UnitedHealthcare or because your objectivity could be questioned because of those interests or activities. For the purpose of this disclosure and attestation requirement, immediate family members are limited to spouse/domestic partner, child, parent, or sibling, including step-relations and in-laws. Note: Under UnitedHealthcare's conflict of interest policy, aunts, uncles, cousins, and grandparents are not considered immediate family members.

Instructions

To complete your disclosure and attestation:

- Read each of the following conflict-of-interest scenarios and select NO if the scenario does not apply to you or YES if it does. You must select a response to proceed.
- For each YES response, provide information related to the conflict.
- You may have more than one conflict for a particular scenario. Provide information related to each conflict.
- If a conflict management plan is presented, read through the plan and select 'I AGREE' or 'I DISAGREE' to indicate that you have read the management plan and agree or disagree to comply with its terms.
- After completing the disclosure section, read the Attestation section and select 'I ATTEST' and then 'SUBMIT'.

Continue

Step 2: Answer Scenario Questions

- The scenarios presented to you are based on whether you are contracted with UnitedHealthcare or are an employee of UnitedHealth Group or its affiliates.
- Read each scenario description and the questions that follow carefully.
- Each question requires a yes or no answer. If you answer yes, you will be asked to provide additional information. If you selected yes in error and already clicked continue, click the Back button at the bottom of screen in order to change your response.
- For each question, continue to answer yes and provide the information requested if you have additional conflicts or answer no when you are finished disclosing conflicts for that question. *Note: For each question, you can enter up to five conflicts. If you need to disclose more than five conflicts for a particular question, please contact Agent_COI@uhc.com for instructions.*
- **There are four scenario categories that will be presented.** Some questions ask you about your immediate family members and others relate only to you.
- Read each of the scenarios and select **NO** or **YES**. You must select a response to proceed to the next screen.

Note: This guide shows screens and scenario questions for a non-UnitedHealthcare employee (i.e., contracted). If you are an employee of UnitedHealth Group or its affiliates, your screens and questions may vary slightly.

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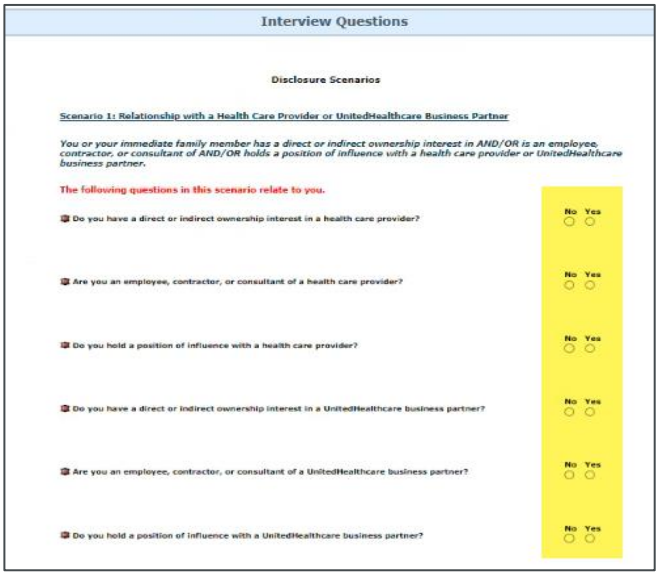
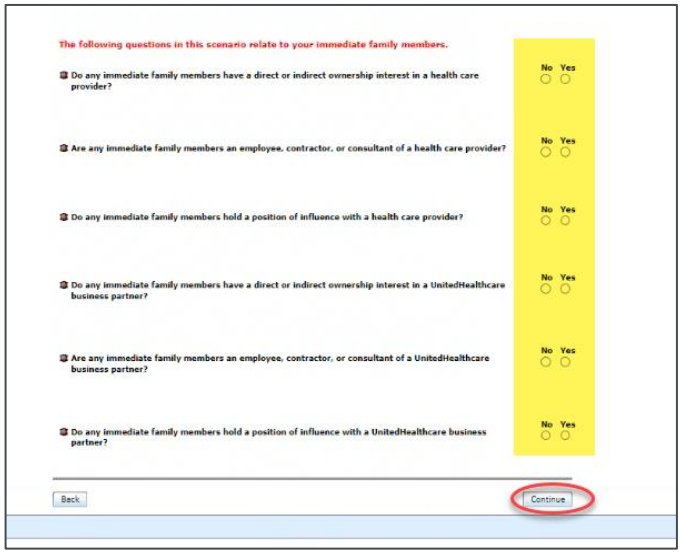
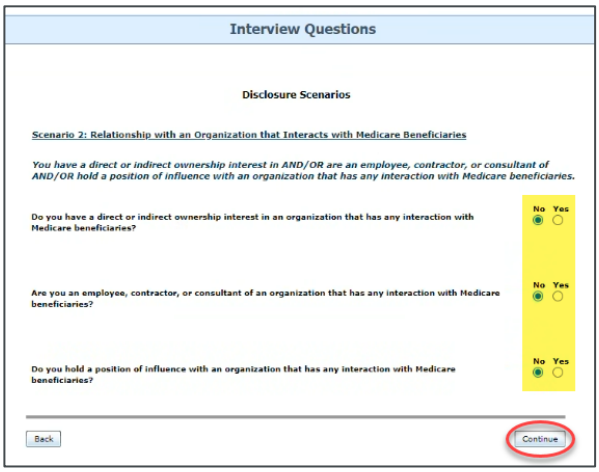
Scenario 1–Part 1: Relationships with providers and UnitedHealthcare business partners



Scenario 1–Part 2: Immediate family members' relationships with providers and UnitedHealthcare business partners

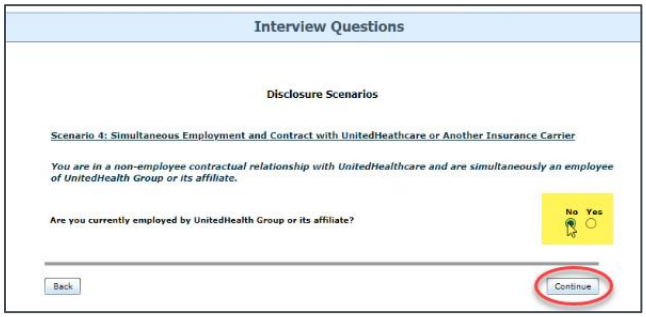


Scenario 2: Relationship with organizations that interact with Medicare beneficiaries (Individual and Family Plan agents skip this section) *Note: if you are an IFP only producer, you will not need to answer scenario 2 and will be prompted to continue.*



Scenario 3: Relationship between employee and agent/agency appointed with UnitedHealthcare

Scenario 4: Other Carrier Relationship (not everyone will see this scenario)



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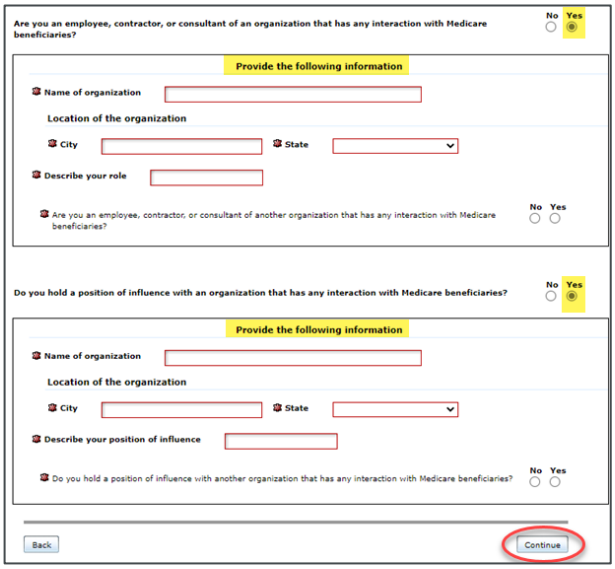
Click continue as you finish each section.



Note: this screen illustrates additional information that may be requested following a "yes" response.

Step 3: Management Plans

Each disclosed conflict of interest is evaluated to determine if it can be managed. For manageable conflicts, you will receive a management plan that outlines how UnitedHealthcare intends to manage the conflict. Management plans must be acknowledged upon receipt. When a disclosed conflict cannot be managed, you will be instructed on your options.

- If you answer YES to a question within a scenario, you will receive feedback at the end of that scenario regarding the conflict. If a management plan is presented, read through the plan and select **I AGREE** to indicate that you have read the management plan and agree to comply with its terms.
  Note: Only select "I DISAGREE" if you are not willing to comply with the management plan presented. Do not select 'I DISAGREE' if you do not understand or have questions about the management plan. Instead, take a screen shot of the management plan and send it along with your question to Agent_COI@uhc.com. Selecting "I DISAGREE" will result in you getting a 30-day termination notification or, if an employee of UnitedHealthcare or its affiliates, entering the corrective action process.
- You will be presented with a plan for each question where you answered YES. If you had more than one conflict to disclose for a question, the management plan will apply to all conflicts for that question. If you answered yes to more than one question, you will need to continue scrolling through each management plan and select I AGREE or I DISAGREE for each to proceed.

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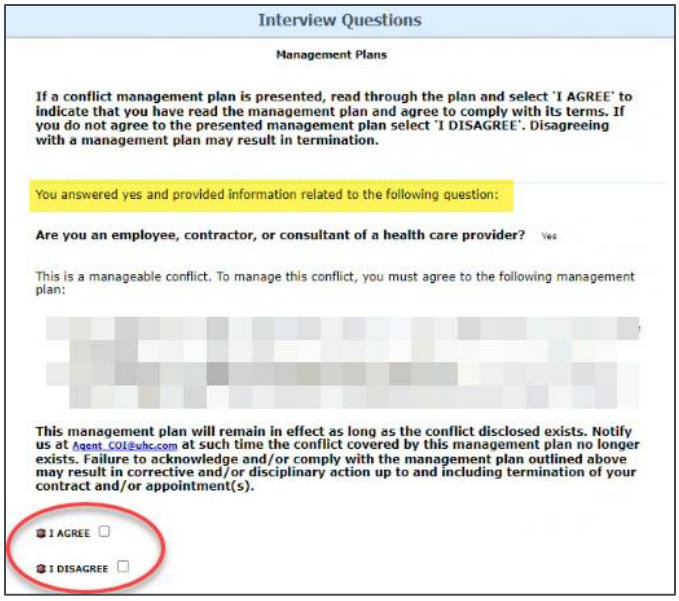

- In some cases, the COI team must review the information you have disclosed in order to provide a management plan or give you direction on next steps. You will be advised at the end of each applicable scenario when this situation has occurred.

Reminder: If at any point during the interview you have a question, take a screen shot and email it with your question to Agent_COI@uhc.com. You can exit Sircon and reenter the interview another day once your question is answered. Your entries will save if you complete a section, click Continue (bottom right), and then click Save and Exit (top right).

Step 4: Attestation

- After completing the disclosure section, read the Attestation section and select **I ATTEST** and then **Continue**.

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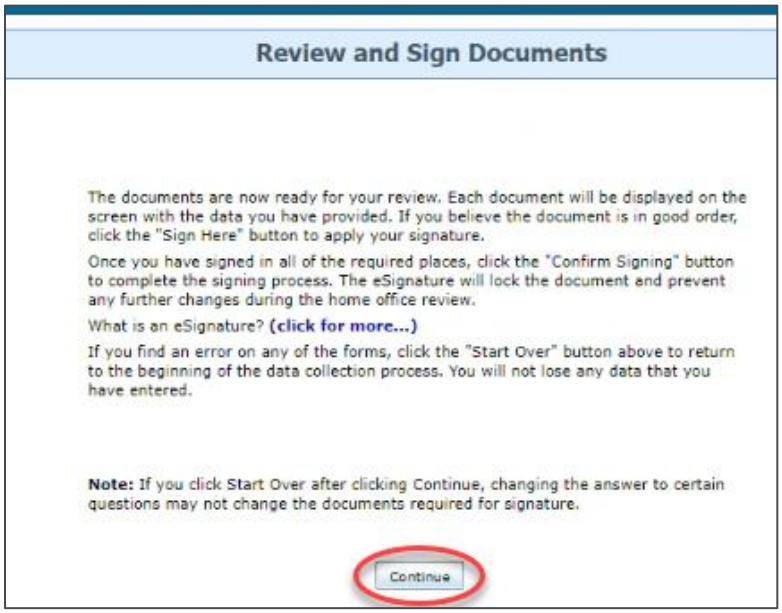
Step 5: Review and Sign

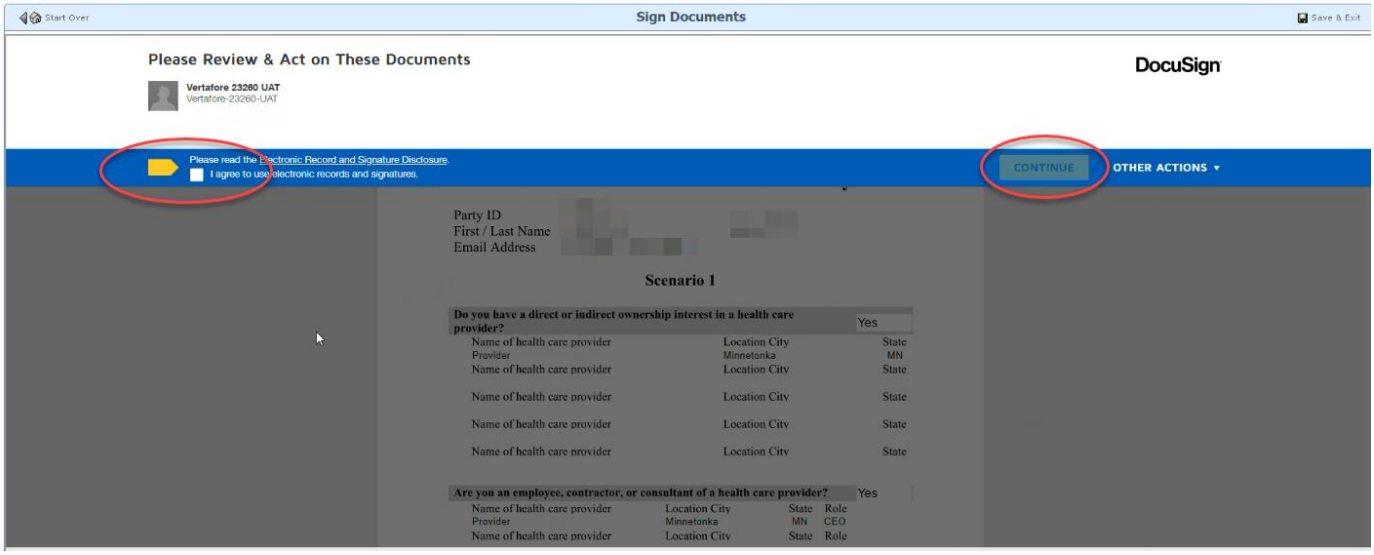
- In order to save a copy of your interview in your Sircon account, you will receive instructions to review and sign your documents.
- Click **Continue** after reviewing the instructions.



Step 6: DocuSign

This step creates a record of your interview that you can access at any time by logging into your Sircon account. You cannot change any answer or information provided during the interview stage.

- At the top, click the **I agree to use electronic records and signatures** to remove the shading and scroll through your COI attestation and disclosure document. **Note:** On the summary page, for scenarios 3 and 4, you will see both the employee and non-employee versions of the question. Your response will only display for the version of the interview you completed and the other will be blank.



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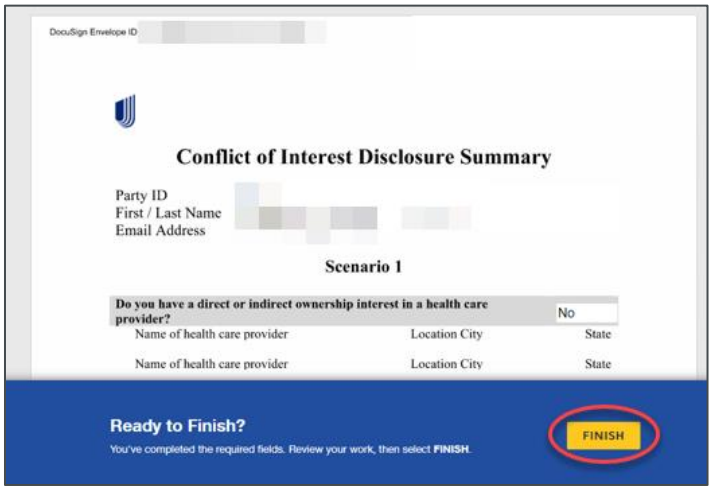
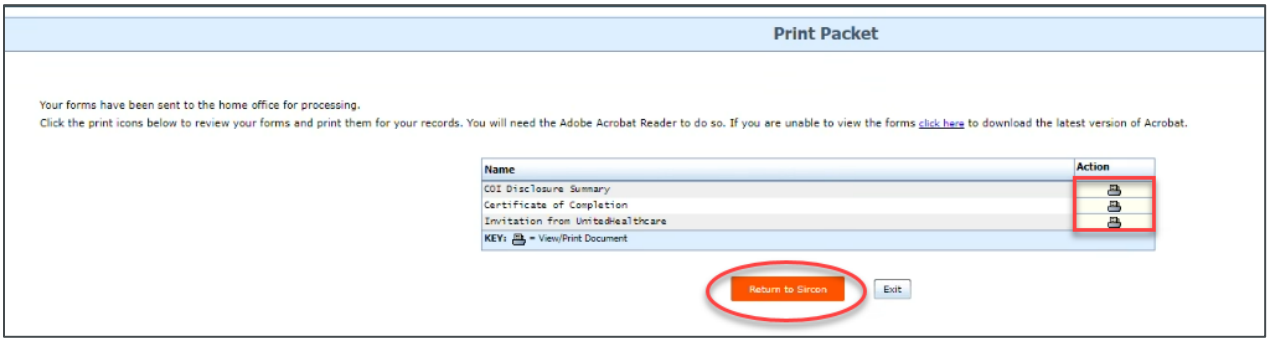
- Click **Finish**.



Step 7: Print Packet

In this step, you can print COI attestation and disclosure related documents for your records. You can return to your Sircon account at any time to review these documents.

- To print a document, click on the **print icon** in the action column.
- When you are finished printing, click **Return to Sircon** or **Exit** to close the browser.



Thank You Email

When you submit your COI attestation and disclosure, you will receive a thank you email confirming that your COI is complete.

Frequently Asked Questions (FAQ)

Q: What should I do if I cannot find my email invitation?

A: First, verify the date your Party ID (PID) was issued and the email you have on file with UnitedHealthcare. Your COI attestation and disclosure email invitation will be sent on the date your PID is issue if you are newly onboarding or on your PID anniversary date thereafter. Second, if you are expecting the email invitation, check your SPAM or Junk Mail folder. Alternatively, log in to your Sircon account and click on "UnitedHealthcare invites you to complete your Sales Distribution Conflict-of-Interest Attestation and Disclosure" if listed in your To Do tab. If, after completing those two steps, you have concerns about not having received an email invitation, contact Agent_COI@uhc.com.

Q: What should I do if I deleted my email invitation?

A: Log in to your Sircon account (https://platform.sircon.com/) and click on "UnitedHealthcare invites you to complete your Sales Distribution Conflict-of-Interest Attestation and Disclosure" if listed in your To Do tab. Reminder emails have the Get Started With Sircon button, so you do not have to have your original invitation email.

Q: What should I do if I cannot complete my invitation once I start it?

A: To come back at a later time to complete your interview, click Save and Exit. Make sure you complete your interview within 90 calendar days of receiving the email invitation.

Q: I completed my COI attestation and disclosure but forgot to disclose a conflict I have. What should I do?

A: Email Agent_COI@uhc.com and explain your situation. You will be instructed on next steps.

Q: I disclosed a conflict when I completed my COI attestation and disclosure, but it no longer exists. What should I do?

A: Email Agent_COI@uhc.com and explain your situation. You will be instructed on next steps.

Q: Who do I contact if I am having technical issues with Sircon or unable to get into Sircon?

A: Contact the **Producer Help Desk (PHD)**

- Phone: 866-235-4095
- Chat: on Jarvis, under Agent Support Center

Q: What should I do if I do not understand a question in a scenario?

A: Take a screen shot of the question you do not understand and email it with your question to Agent_COI@uhc.com.

Q: What should I do if a management plan presents and I do not understand it?

A: Do not click "I Disagree" if you do not understand the management plan or have questions related to it. Take a screen shot of the management plan and email it with your question to Agent_COI@uhc.com.

Appendix

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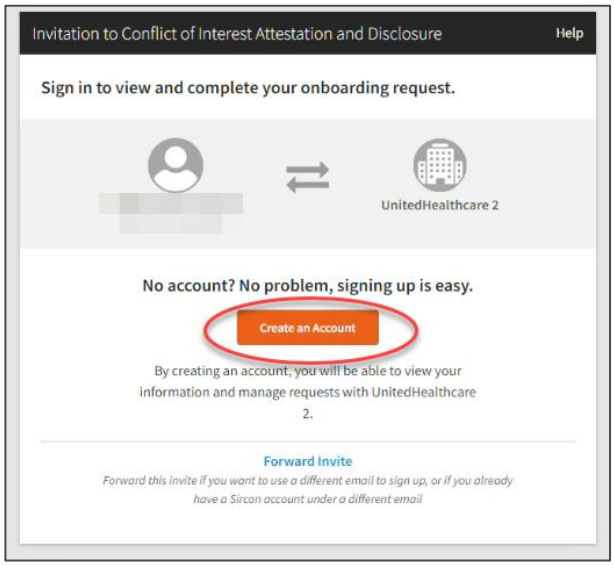
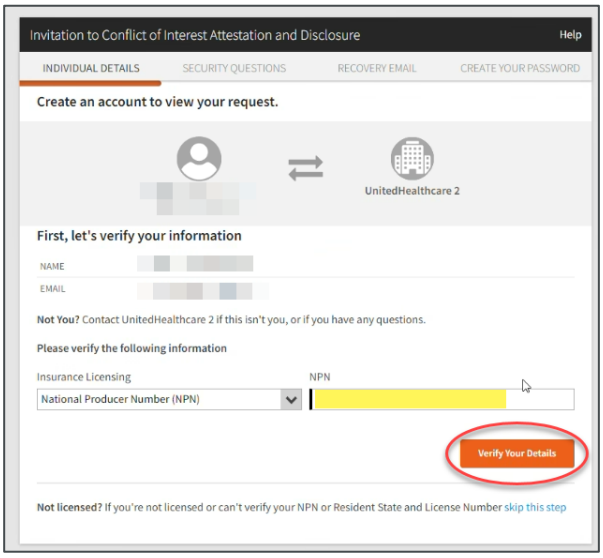
Follow the instructions below according to whether you are new to a Sircon account or have an existing Sircon account.

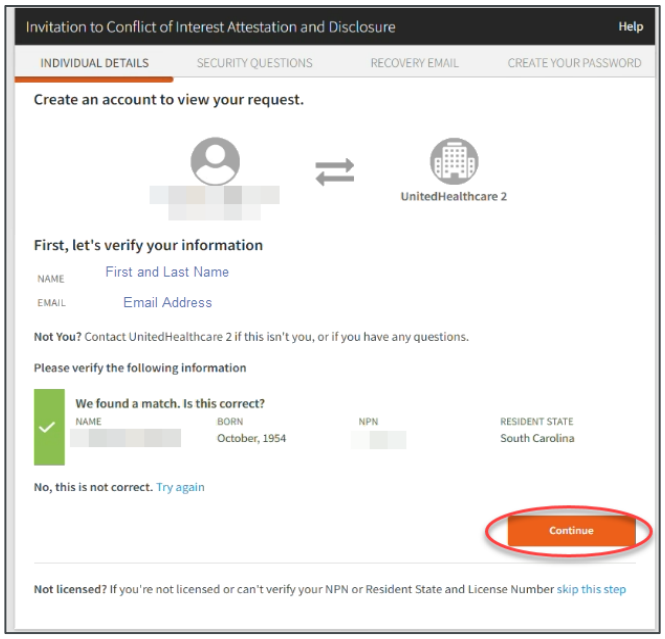
Getting Started with Sircon: New Account

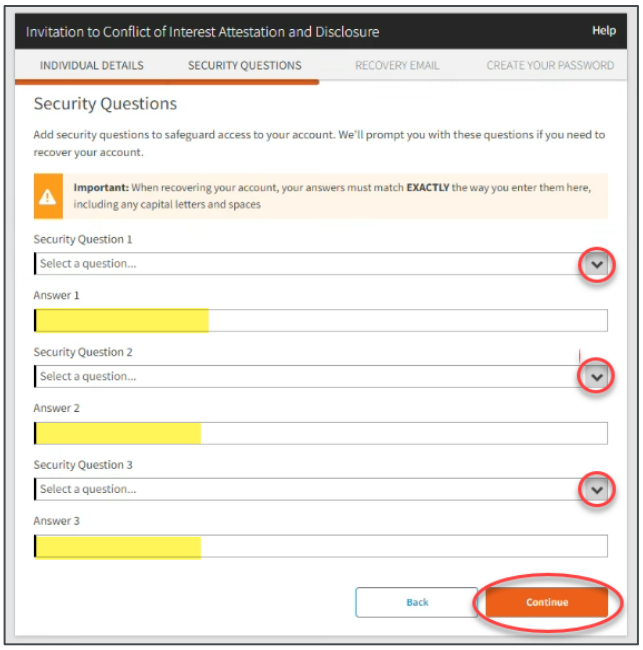
- Click on **Create Account**
- Enter your NPN
- Click **Verify Your Details**





- Review the account that appears and click **Continue** (if this is not you, click on try again)
- Select 3 security questions by using the **drop-down menus** and fill in the answers
- Click **Continue**





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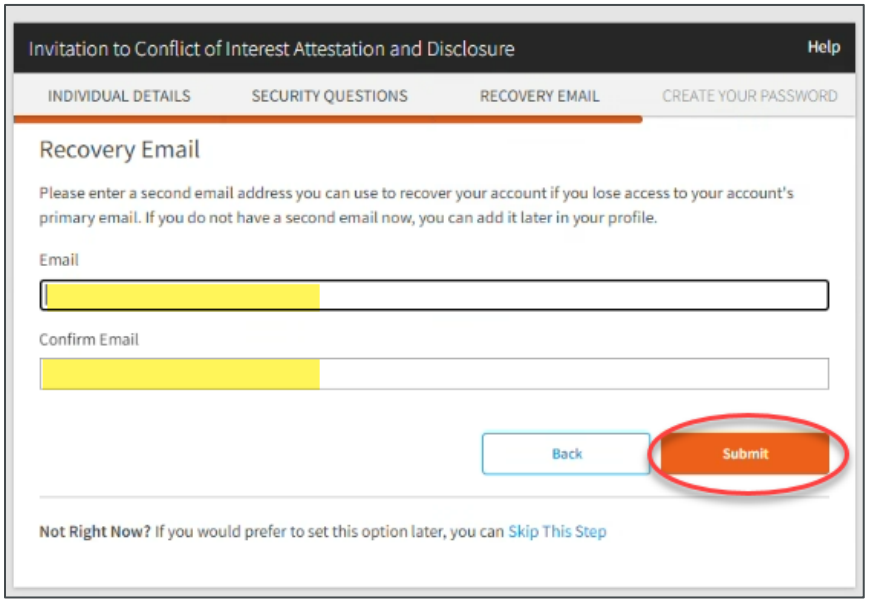
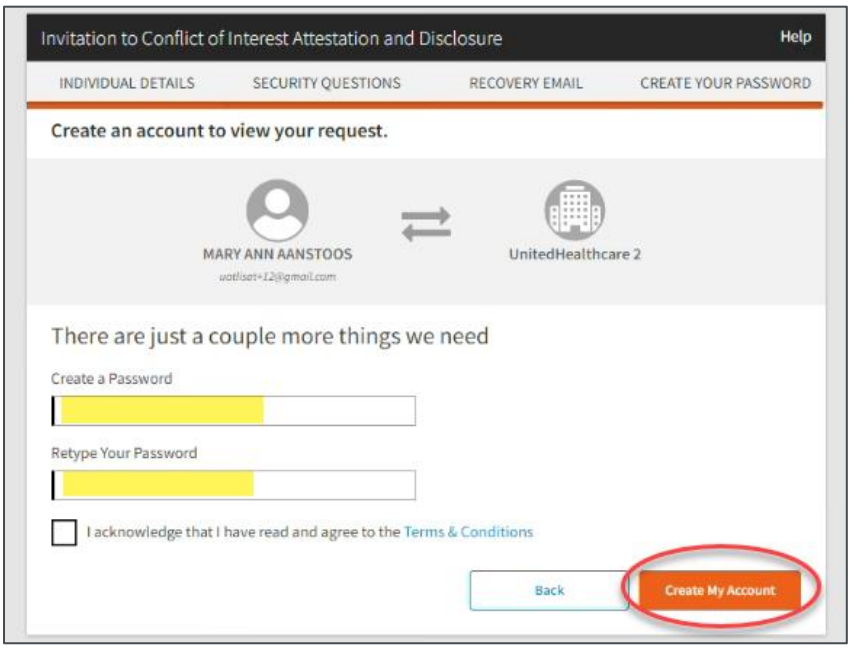
- Enter a recovery email
- Click **Submit**



- Create a password
- Click the **I acknowledge** box to agree to the terms and conditions
- Click **Create My Account**
- Follow the process outlined in the “Completing the COI” section.



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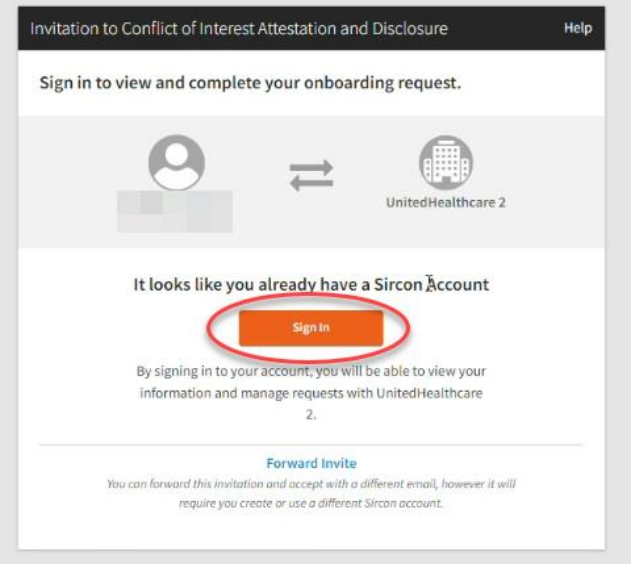
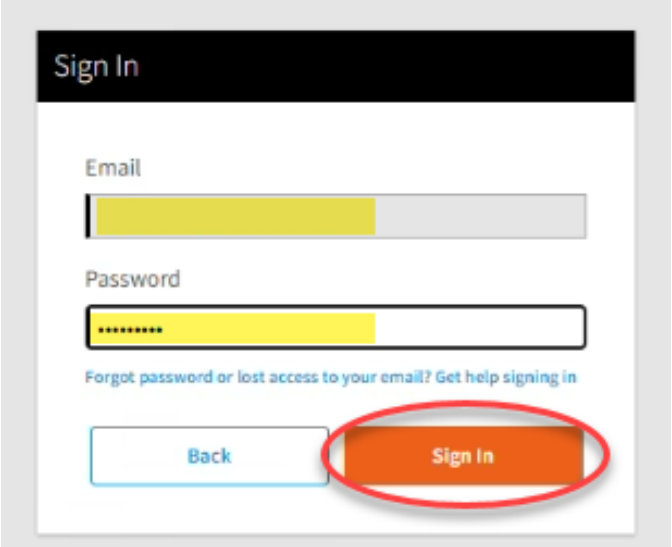
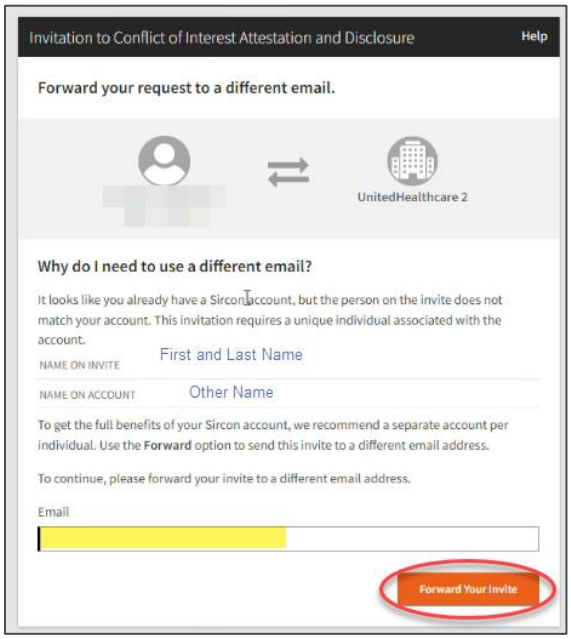
Getting Started with Sircon: Existing Account

- Sign into your Sircon account (https://platform.sircon.com/)
- Follow the process outlined in the “Completing the COI” section.





*Note: If you receive a pop-up notification that your email already exists, enter a new email address and click **Forward Your Invite**. This happens when you share an email address with other parties. You must have your own email address to log in to Sircon and complete your COI attestation and disclosure.*



If you are having Sircon technical issues, contact the **Producer Help Desk (PHD)** via one of these options:

- Phone: 866-235-4095
- Chat: on Jarvis, under Agent Support Center

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