



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 behalf of UnitedHealthcare using the internet. This includes, but is not limited to, websites and social media platforms, such as Facebook, Instagram, Twitter, LinkedIn, YouTube, blogs, chat rooms, and message boards.

This job aid also includes UnitedHealthcare policies regarding the use of its name, or its affiliate AARP, on agent websites or social media. Additional rules for content creation, permission to contact, and security requirements may also apply. See the “Resources” section for added information.

Only agents that are actively contracted with UnitedHealthcare may utilize UnitedHealthcare or AARP branded assets as described in the “UnitedHealthcare and Brand Requirements” section. Agents in servicing status or terminated by UnitedHealthcare, must remove these assets no later than the start of their servicing status date or termination date with UnitedHealthcare.

Agents are solely responsible for the compliance of their agent/agency created websites and social media accounts.

GENERAL REQUIREMENTS

Unless otherwise specified, the rules in this job aid apply to any online or social media activities that may lead to enrolling a consumer in a UnitedHealthcare Medicare plan. Only business-related websites or social media accounts may be used for lead generation purposes. Personal websites or social media accounts that blend personal and business activities must not be used for lead generation.

URLs with “Medicare”: Be careful when using 'Medicare' in website URLs, business names or logos to avoid confusing or misleading consumers about your relationship with CMS. UnitedHealthcare advises agents to seek legal advice from their own legal counsel about relevant laws before using 'Medicare' in a URL.

URLs with “UnitedHealthcare”, “UHC” or “AARP”: Using “UnitedHealthcare” or any derivation thereof (such as “UHC”) and/or “AARP” in URLs, account names or domains is strictly prohibited.

Agent Details: You may share your contact details, an approved agent title, and information about your insurance services. Check the Agent Guide on Jarvis for more information on compliant agent titles. You must not mislead consumers regarding your primary role as an insurance agent or agency.

Announcing Products You Offer: You may indicate the Medicare product types you are authorized to sell. For example:

- Medicare Advantage Plans
- Medicare Advantage Special Needs Plans
- Medicare Supplement Insurance Plans

- Part D Prescription Drug Plans
- Medicare Insurance Plans

Content about products offered:

- **Educational Content:** Your website may offer general Medicare information that CMS defines as “communication”. Ensure the information is up-to-date, accurate, and properly sourced.
- **Marketing content:** UnitedHealthcare approval is required on all websites and social media materials that meet the CMS definition of marketing material. Down-line agents and solicitors are not permitted to operate a website that contains marketing content.

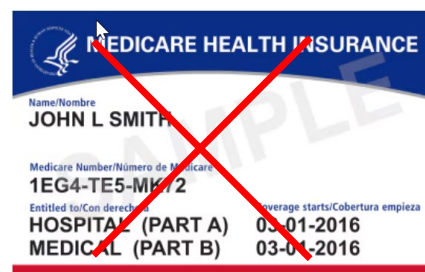
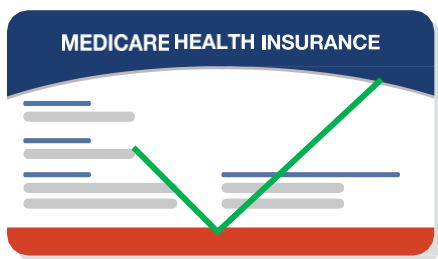
Review the Agent Guide on Jarvis for the definitions of “communications” and “marketing”. As a reminder, information provided on an agent/agency’s website or social media must not be used as substitute for the information that must be provided to a consumer prior to enrollment.

Consumer Testimonials: You must not use testimonials about UnitedHealthcare or its plans. If you use testimonials about your agency, you are responsible for ensuring the testimonial’s use complies with applicable laws as well as getting appropriate authorization from the person giving the testimonial prior to using it.

Event Advertising: You may post educational or marketing/sales event advertisements on your business website and social media if they do not meet the CMS definition of marketing material. Check the Agent Guide on Jarvis for disclaimers and other event rules.

Hyperlinks: Agents may share links to government websites like www.medicare.gov, www.cms.gov, www.hhs.gov, or www.ssa.gov as allowed by those sites. They may also share links to other educational websites with the owner's permission. Make sure all links are current, correct, and working. Note: If you include the 1-800-MEDICARE or Medicare TTY number on your business website, you must also mention the hours and days they operate at least once.

Medicare Card Images: Agents must get CMS approval to use a Medicare card image. UnitedHealthcare will not request CMS approval for agents. Graphic versions of the Medicare card do not need CMS approval. Proof of CMS approval may be required if a site has a Medicare card image during monitoring activities.



Third-Party Intellectual Property: Do not use copyrighted images, videos, or audio in digital content without appropriate permission. See the section “UnitedHealthcare and AARP Brand Requirements” for information on UnitedHealthcare rules about its and AARP’s brand elements, assets and materials.

Interactive Communication Features:

Agents must not use interactive communication features to initiate contact with consumers.

- **Agent Websites:** Chat functions must clearly state that the consumer is contacting a licensed sales agent. If used to collect consumer contact information, it must comply with the requirements in the section “eBRCs for Websites”.
- **Social Media:** If a consumer contacts an agent via social media, the agent may reply to the consumer. However, an app’s messaging service may not be secure. As a best practice, redirect the consumer to contact you by a secure method.
- **Message boards or similar** whether hosted on an agent’s website, social media, or third-party are discouraged as a means of communication with consumers due to the potential for HIPAA violations.

ONLINE FORMS REQUESTING CONSUMER CONTACT INFORMATION

Business websites or Facebook accounts may have an electronic Business Reply Card (eBRC). Forms for referrals must only collect a mailing address or an email for the person referred.

eBRCs for Websites: Agents may use an electronic Business Reply Card (eBRC) or online contact form on their business websites to obtain Permission to Contact (PTC) from individual consumers.

The PTC language must be near the form fields where you ask for contact information, so consumers do not have to scroll or click to find it. The next page provides an example and description of a compliant eBRC to obtain consumer contact information with appropriate permission to contact.

Note: Permission to Contact (PTC) statements and Scope of Appointment (SOA) forms are intended to meet different requirements and must not be combined.

Consumer Contact Information Requests on Facebook: Agents may create an online contact form on Facebook as part of an advertisement using Facebook’s ad creator. The form must follow all rules and guidelines, including the permission to contact statement. UnitedHealthcare only provides compliance requirements, not technical support for platforms it does not own.

One-to-One Consent Rule: Consumers have the right to determine who receives their contact information. Websites or social media must make it clear as to who is obtaining the consumer’s contact information. If the name on the website is not the same as the agent’s name or agent’s business name, the agent or agency name must be provided with the permission to contact statement. Additionally, consumer information must not

be transferred to another TPMO without the consumer's express consent. Therefore, if consumer information is gathered on a form with the intent to provide it to another TPMO, the consumer must have the ability to select which TPMOs are permitted to receive their contact information. The method provided for the consumer to select recipients must be clear, conspicuous and enable the consumer to individually select the recipient(s). A declaration that the consumer is automatically opted into all the TPMO's partners by submitting their information does not meet this requirement.

Example of a Compliant eBRC for an Agent Owned Website: Please note that this is an eBRC for an individual agent website that will be used by the agent receiving the consumer's contact information. Therefore, the receiving entity does not need to be identified with the permission to contact statement, and a one-to-one consent mechanism is not required.

Contact Us About Medicare Plans!

First Name

Last Name

Your Phone Number

Your Email

Your Message

Yes, I would like to have a licensed insurance agent call or email me about Medicare Advantage plans, Medicare Part D Prescription Drug plans, and/or Medicare Supplement insurance.

This is a solicitation for insurance.

Send Message

Consumers provide first and last name. Only the person listed can be contacted. Others who share the same phone number or email address cannot be contacted.

Agents can request contact details like phone number, email, or postal address.

Note: If any contact information is missing or incorrect, the agent cannot use other sources to find it.

Identify the role of the person receiving the Permission to Contact.

Match the contact method to the fields provided.

Identify products for which consumers are providing their PTC.

Note: Products can be individual types, such as this example, or categories such as "Medicare insurance plans". If using individual types, as a best practice list the three shown in the example.

Use this statement when the products include Medicare Supplements.

UNITEDHEALTHCARE AND AARP BRAND REQUIREMENTS

This guidance in this section applies to agent websites and social media, for guidance for uses on other types of materials or content, please refer to the “Resources” section. Only the content specified as permitted in this section about UnitedHealthcare or AARP may be used on agent websites or social media.

The UnitedHealthcare name and or logo may be used by agents only on a website owned and operated by the agent to announce their affiliation with UnitedHealthcare as a contracted agent representing UnitedHealthcare. The agent must be active (i.e. meet all qualifications for selling UnitedHealthcare plans) and register the website URL with UnitedHealthcare before displaying the UnitedHealthcare name or logo. The logo along with the terms for its use will be provided upon request with or after registration of the website. (Registration instructions are provided at the end of this section). Registration and use of the UnitedHealthcare name or logo is only applicable to the website URL registered. Agents that are not active (i.e. not permitted to market UnitedHealthcare) must remove all UnitedHealthcare references from their website.

When announcing your affiliation with UnitedHealthcare on your owned and operated website, follow these rules:

- "UnitedHealthcare®" is one word with capital U and H. Use the registration mark for the first appearance.
- Only use the logo provided and according to the terms of use, which includes not altering it, except for resizing in a way that does not change the ratios for height and width (i.e. making it bigger or smaller without stretching in only one direction).
- Other than your ability to represent UnitedHealthcare, you must not create or post any content about UnitedHealthcare or AARP without prior approval from UnitedHealthcare. Note: Approvals for any added content about UnitedHealthcare are rare and exceptional.

UnitedHealthcare’s social media: Agents may share (e.g., post a link, posting the unmodified original post) or like content from the official UnitedHealthcare (www.facebook.com/UnitedHealthcare, www.youtube.com/UnitedHealthcare) or Medicare Made Clear (www.facebook.com/medicaremadeclear, www.youtube.com/medicaremadeclear) Facebook account or YouTube channel on an agent created website or Facebook account.

- Agents/agencies may only link to official YouTube videos and must not embed them.
- Without UnitedHealthcare’s prior approval, agents must not share or like content that meets the CMS definition for marketing material. (See the Agent Guide on Jarvis for the definition of “marketing” materials.)
- Agents/agencies must not add content or comments when sharing or liking UnitedHealthcare content.

- Agents/agencies must not change approved content or UnitedHealthcare original content and must not send content through unsolicited contact.

UnitedHealthcare myuhcagent.com page: If you have a myuhcagent.com webpage, you may link to it from your business website or social media. You may also display a non-branded image or text as a link to your myuhcagent.com webpage.

A2O Web Banner: The A2O web banner is only available to "A2O Level 2" agents. Qualified agents may download the banner from the UHC Agent Toolkit. The banner must be used on agent websites as described and permitted in the instructions accompanying the banner in the UHC Agent Toolkit.

Other than the A2O banner, agents must not use the AARP brand name, logo, or branded materials in other ways on their websites, nor are they permitted to link to the AARP website or articles about AARP. Not following these rules may result in an agent contract violation and disciplinary action from UnitedHealthcare.

UnitedHealthcare and/or AARP Branded Materials: Agents must not use UnitedHealthcare branded materials on their websites. Agents may use preapproved social media assets from the UHC Agent Toolkit on social media platforms as indicated in the UHC Agent Toolkit.

Posting any other content on agent websites or social media, (such as appointment forms, enrollment guides, applications, agent communications, or sales information related to UnitedHealthcare) is not allowed.

Website Registration: You must register your website with UnitedHealthcare before announcing your affiliation with UnitedHealthcare as a contracted agent representing UnitedHealthcare on your website. Send an email with the subject "Website Registration" to Compliance_Questions@UHC.com. Include your writing ID number and the complete URL of your website's home page (usually starting with "https://www"). You may also ask for a copy of the approved UnitedHealthcare logo for your website.

UnitedHealthcare's acknowledgement of your registration request does not mean UnitedHealthcare has reviewed or approved your website. Agents are responsible for ensuring their website complies with all relevant requirements.

AGENT FACING WEBSITES

Agent-facing websites are designed for agencies to help with agent recruitment, education, and communication. Such sites must follow UnitedHealthcare and AARP Brand Requirements and include a disclaimer to the effect: "The information on this website is for agent use only and is not intended for use by the general public."

Agent-facing websites may provide a link to Jarvis (www.uhcjarvis.com) for agent use but must not post any proprietary UnitedHealthcare information even though password protected. Examples include but are not limited to UnitedHealthcare communications, Job Aids, Agent Guides or plan availability reports. Agent-facing

websites must not post any information about UnitedHealthcare beyond indicating affiliation with UnitedHealthcare.

EXPECTATIONS, MONITORING, AND CORRECTIVE ACTION

Professional Conduct is essential:

- **Act responsibly, respectfully, and professionally.** Do not insult, threaten, or use obscene language about anyone or any entity. If targeted by such actions, report them to the appropriate authorities instead of engaging.
- **Be transparent** about your role and intentions as a licensed sales agent.
- **Provide factual and unbiased information** so that the consumer may make a choice that best suits their personal situation.
- **Never share or request confidential information** like protected health information (PHI) or personal Identifying information, or financial information through unsecured platforms or methods. Refer to the Agent Guide on Jarvis for more security information.

Internet Monitoring: UnitedHealthcare does not pre-approve agent websites or social media. Agents must follow the guidelines provided, and keep their websites updated with any new rules from UnitedHealthcare and any applicable federal, state and local requirements. Any agent online activity related to UnitedHealthcare, its policies, contractual agreements, or those of its affiliate AARP is subject to monitoring.

Corrective Action: If an agent's website or social media account is deemed not compliant with UnitedHealthcare policy or applicable regulatory requirements, the website or social media account owner (and their respective upline as deemed appropriate) will be notified. The notification will provide notes on the identified infractions and a deadline by which the infractions must be resolved. Coaching and training will be required according to UnitedHealthcare policy. Failure to resolve the identified infractions within the specified time frame may lead to additional disciplinary action, up to and including termination.

Third-Party Advertisers and Developers: Agents are responsible for making sure their website or social media are compliant with UnitedHealthcare policy and regulatory requirements, even if a third party is used to develop their website or social media.

RESOURCES

Jarvis Website: www.uhcjarvis.com .

Agent Guides: Available on Jarvis, they provide guidance on CMS regulations and UnitedHealthcare rules, policies, and procedures.

Sales Policy Job Aids: Available on Jarvis, including:

- Agent Created and UHC Agent Toolkit Materials Guidelines
- Permission to Contact and Lead Generation
- Scope of Appointment

Producer Help Desk (PHD): Call 1-888-381-8581 (Español presione la opción 2) for assistance accessing or using the Jarvis website or the UnitedHealthcare Toolkit.

Compliance Questions: Questions about policy or regulations, compliance_questions@uhc.com or your UnitedHealthcare agent upline or business account manager.