

Sales Policy Job Aid

Agent Website and Social Media Guidelines



Website, Social Media, and Digital Content Guidelines

Website and Social Media Domain Names and URLs

Domain names and/or URLs must not contain any UnitedHealth Group or affiliates or AARP® brand name or brand derivative, including plan name or abbreviation (e.g., UHC).

UnitedHealthcare will not evaluate an agent domain name or URL for the purpose of providing approval. You 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 Domain Name and/or URL

Guidance prohibits the use of names, words, letters, or any other combination or variation in reference to Medicare, Social Security Administration (SSA), Department of Health and Human Services (DHHS), Medicaid, or any other government entity that is misleading or conveys or could be reasonably construed as conveying the false impression that the agent, business, or content mentioned is connected to, approved, endorsed, or authorized by Medicare or any other government entity.

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.

Digital Content Guidelines

UnitedHealthcare Branded Marketing or Plan Materials

You must not:

- Post any UnitedHealthcare branded marketing and plan materials, plan specific information, plan or product specific names or logos, benefit or benefit structure information, premium or cost sharing information, comparisons or ranking or measurement information between plans, and/or star rating information.

- 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.uhcmedicareolutions.com home page (only), where consumers can then navigate to plan descriptions and details. However, an agent business website cannot link or be fed data from LEAN or any UnitedHealthcare or affiliate website.

Prohibited Website Design

You must not use symbols, emblems, images, or color schemes in a manner that is misleading or conveys or could be reasonably construed as conveying the false impression that you, the business, or content mentioned is connected to, approved, endorsed, or authorized by Medicare or any other government entity.

Announcing Product Offering

You may indicate the product types you 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

Prohibited Terminology, Misleading, or Inaccurate Information

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

- You must not post content that is materially inaccurate, misleading, or otherwise make misrepresentations or could confuse beneficiaries.
 - For example, you must not identify a Medicare Supplement Insurance plan as a Medicare Advantage plan or misrepresent a Medicare Advantage as a Medicare Supplement Insurance plan or vice versa.

- You 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.
 - For example, you must not state or imply that plans are only available for “seniors”, rather than to all Medicare eligible individuals.
- You must not use unsubstantiated absolute or unsubstantiated qualified superlatives or disparaging comments.
 - 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”).
 - You must substantiate statements and should cite sources as applicable.
 - **Note:** Unsubstantiated absolute and/or qualified superlatives may be used in logos/taglines.
- You 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.

Generic Materials

You may post agent-created generic materials or advertisements on your business website or social media accounts. Refer to the Agent Created and UnitedHealthcare Toolkit Materials Guidelines job aid (available on Jarvis) for details related to generic materials.

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. You may feature educational content, but should cite sources, including publication dates. 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

You may post generic educational and/or marketing/sales event advertising on your business website and social media accounts. Advertisements or invitations to educational and 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.

When 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 Details

You may post your contact information, agent title, and your business services. 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

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. The eBRC or online contact form must comply with all rules, regulations, and policies including rules on agent created materials and permission to contact and lead generation. In addition to the guidelines within, refer to the Agent Created and UnitedHealthcare Toolkit Materials Guidelines job aid for additional eBRC or online contact form requirements.

Agent/agency created eBRC or online contact forms must be generic. The eBRC or form must include statements or options that would lead a consumer to reasonably understand they will be contacted by a plan representative (e.g., licensed sales agent) to discuss Medicare insurance options or may include the exact individual product types to be discussed such as MA plans, PDP, and/or Medicare Supplement Insurance or may refer to options collectively (e.g., Medicare insurance options). The eBRC or form must explicitly indicate the specific contact method(s) and must include a mechanism, such as a checkbox, so the consumer can indicate the method(s) by which the agent is permitted to make direct contact with the consumer. The eBRC or form must include the disclaimer, “**This is a solicitation for insurance**” when generating leads for Medicare Supplement Insurance plans.

You may feature an online contact form on Facebook. The online contact form must be part of a created advertisement through the Facebook application. A Facebook advertisement that includes an online contact form must be generic (with the exception of resources from the UnitedHealthcare Toolkit explicitly created for select agent use on Facebook). The Facebook advertisement and online contact form must comply with all rules, regulations, and policies including the eBRC or online contact form guidance above. Below are guidelines to help you remain compliant when creating a Facebook advertisement.

- In the Headline Window section, include a headline that is clear in the intent of the online contact request. Such as, “Talk to a licensed sales representative”.
- In the description window section, along with the generic description message, include 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 Medicare coverage options.”
- In the Add a Question section, include verbiage that indicates 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.” Online contact forms must include the disclaimer, “**This is a solicitation for insurance**” when generating leads for Medicare Supplement Insurance plans.
- In the Customer Info section, select the information being requested and include the specific method of contact(s). It is recommended to not request more than 3 pieces of information in this section.

As a reminder, PTC and Scope of Appointment (SOA) **are not** the same and **are not** interchangeable.

Do Not Use Third-Party Intellectual Property

You should avoid using any copyrighted images, video, or audio in any digital content without appropriate permissions, and refrain from the use of third-party trademarks if such use might incorrectly suggest an affiliation with UnitedHealth Group.

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.

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

Plan Sponsor Affiliation

You must be licensed and contracted, appointed (if applicable), and certified with UnitedHealthcare in order to announce your affiliation with UnitedHealthcare. You may use the UnitedHealthcare name, approved logo, and/or hyperlink to the www.uhcmedicareolutions.com website homepage to announce your 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.

You must not display, use, or reference any other UnitedHealthcare-affiliated logo, brand, or product or plan name or any of the preceding elements that contains or is affiliated with “AARP” on your business website. However, if you are an Authorized to Offer (A2O) AARP Medicare Plans Elite (also known as Level 2) agent, you may display the A2O web banner on your consumer-facing website.

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.”

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

Brand and Logo Usage on Business Websites

You may only use the currently approved UnitedHealthcare logo on your business website. Only logo files provided by UnitedHealthcare are compliant. As of 06/24/19, the approved logo does not contain the “Medicare Solutions” tag line and features a registration mark.



To request the approved logo file, you may include the request for the logo in your website registration submission. You must not copy, paste, or use a logo from this job aid; other branded materials, or logos obtained from non-approved sources. Please note that the provided logo is only approved for use on an agent created business website and cannot be used in any other manner.

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, copyrighted, and property of UnitedHealthcare. You must not alter or modify the design of the UnitedHealthcare logo.

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.

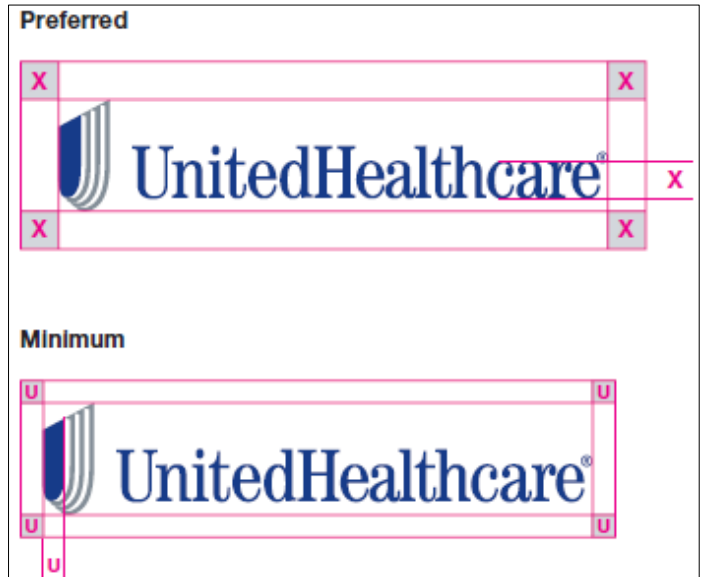
The logo can vary in size as long as the proportions remain the same.

- 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.

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.



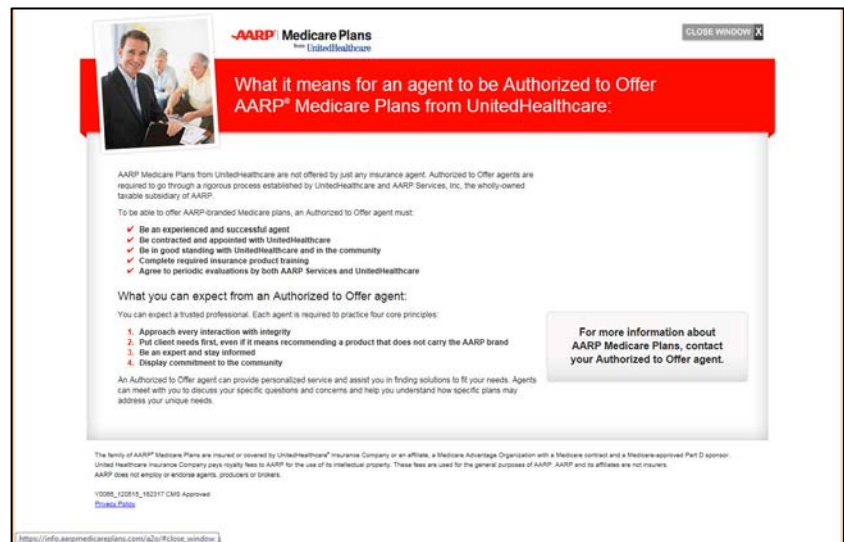
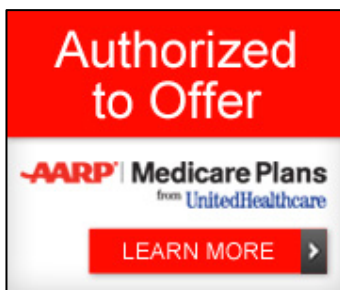
Examples of **incorrect** logos:



A2O Web Banner

A2O Elite (also known as Level 2) agents may order the approved A2O Authorized to Offer web banners from the UnitedHealthcare Toolkit. After ordering the web banner, you will receive additional instructions via email on how to receive the A2O Web banner HTML code, which is unique to the URL provided. The Authorized to Offer web banner will link consumers to an informational landing page.

A2O Web Banner and Informational Landing Page Examples



Miscellaneous Guidelines for Consumer Facing Business Websites

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.

UnitedHealthcare Medicare Made Clear™ YouTube Videos

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. Alternatively, you may include a link to www.uhcmedicareolutions.com homepage. The UnitedHealthcare website contains a “Learn about Medicare” section to which consumers can navigate.

Hyperlinks

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 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).

UnitedHealthcare Branded myuhcagent.com Webpage

If you have a myuhcagent.com webpage, you may include a link to the webpage on your business website. Alternatively, you may use an image (non-UnitedHealthcare branded) or generic verbiage as a re-direct hyperlink to your myuhcagent.com webpage.

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, certification instructions, Agent Guides, Producer Handbooks, job aids, newsletters, or branded Scope of Appointment (SOA) forms.
- An agent-facing website may include a link to Jarvis www.uhcjarvis.com for agent use.

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**, not a personal or multi-purpose (i.e. personal and business) account.

You Must:

- Register your business social media platform(s) with UnitedHealthcare prior to featuring a UnitedHealthcare Toolkit branded resource, if available for you. 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 featuring a UnitedHealthcare Toolkit branded resource on your business social media account.
- Adhere to all regulations, policies, and procedures, including guidelines related to marketing and agent created materials and permission to contact.
- Adhere to the guidelines provided in the prior Digital Content Guidelines section.

You Must Not:

- Use a business social media platform's 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 UnitedHealthcare Toolkit material explicitly developed for select agents for use on Facebook.
 - **Note: Select agents may have access to UnitedHealthcare Toolkit resources explicitly developed for use on Facebook. Prior to accessing and ordering these resources from the UnitedHealthcare Toolkit, the agent must register their business social media account with UnitedHealthcare. Use of non-AARP branded Facebook assets is limited to all agents in the ICA, IMO, and ISR distribution channels and Premier Agents in the EDC channel. Use of AARP branded Facebook assets is limited to A2O Elite (also known as level 2) agents in any channel.**
- Feature an eBRC or online contact form on a business social media account (with the exception of a Facebook advertisement created through the Facebook application.)

You May:

- Include a myuhcagent.com webpage URL on your business social media account.
- Feature an online contact form on a business Facebook account. The online contact form must be part of a Facebook advertisement created using the Facebook advertisement creator. The online contact form must comply with all applicable rules, regulations, and guidelines.

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 by UnitedHealthcare that a compliance issue or concern has been identified will receive 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 (available on Jarvis)

Agent Created and UnitedHealthcare Toolkit Materials Guidelines Job Aid

Agent Events Job Aid

Agent Website and Social Media Guidelines Job Aid

Permission to Contact and Lead Generation Job Aid

Prescription Drug Coverage Reference Job Aid

Scope of Appointment Job Aid

Compliance Questions

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

Jarvis

www.uhcjarvis.com.

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

Registration, Submission, and Publishing Guidelines

All business websites and/or business social media accounts that contain 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 publish your website and/or social media account upon confirmation that your registration was received.

After the initial submission, if the URLs to the existing webpages that feature the UnitedHealthcare brand name, logo, hyperlink, and/or branded resources changes or any new URLs that you want to feature the branded content, 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 an agent business websites or business social media accounts. You are responsible for the compliance of any business website or business social media account.

Agent Business Website Registration

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)

If you are requesting the approved logo, include your request for the logo with your registration submission.

Submit To: compliance_questions@uhc.com

Business Social Media Registration

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

Required Information: You must include the following information to register a social media account:

- 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 Complete URL (e.g., Facebook username, Twitter Handle)
 - For Facebook, after logging into the profile, copy the URL or copy the link to the profile
- 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)
- Email Address Registered with the Platform

Submit To: compliance_questions@uhc.com