

Policy Title:	Agency/Agent Website Review		
Policy Number:	CG CC-0089	Effective date:03/11/2014	Last reviewed:12/11/2020 Current revision:12/11/2020
Purpose:	To provide guidelines for developing agent/agency websites.		
Written by:	Cathy Gatlin	Date: 2-13-2014	
Approved by:	Copeland Group Compliance Committee		
Approval Date:	03-11-2014		
Compliance Officer Signature:	<i>Cathy Gatlin</i>		

**Policy:** Agency/Agent website review

**Purpose:** To prevent non-compliant material use or non-compliant posting on social media by providing oversight of appropriate use of brands and logos used by our agencies/agents as well as the overall content of the website.

**Procedure:**

The following website guidelines will be implemented by Copeland Insurance Group Compliance Department for oversight of Agencies/Agents, who have in place or develop a website meant for consumers or agent use while contracted under Copeland Insurance Group.

**Safeguards and best practices to follow to help ensure that websites are and or remain compliant.**

1. Report your website to Copeland Compliance Department, providing your website address
2. Be licensed and contracted, appointed (if applicable), and certified with the carrier in order to announce your affiliation, display the carrier's brand and/or logo, or hyperlink to a carrier's website. (ONLY the brand and logo allowed by the carrier).
3. Ensure your website is live
4. Ensure all URLs that contain a reference to a carrier are registered with said carrier. Use appropriate carrier logos (ONLY the brand and logo allowed by the carrier).

**Agent Titles**

Use correct and allowable agent titles in order to properly represent yourself to Medicare-eligible consumers

**The following examples are approved titles.**

Licensed Sales Agent, Licensed Sales Representative, Sales Agent, Sales representative

## Language and Content

1. Use the terms Medicare/CMS/Department of Health & Human Services (DHHS) correctly
2. Use the terms Private/Proprietary Info / i.e., Agent contracts, Agent commission info, etc. correctly
3. **Do not** provide inaccurate/misleading /misrepresentation of information
4. **Do not** advertise events for the next AEP online prior to October 1

**Electronic Business Reply Card (BRC)** 1. Ensure the scope of product that governs the PTC is included (e.g., Medicare Advantage Plans, Part D Prescription Drug Plans, Medicare Supplement Insurance)

2. Ensure method of contact is included (e.g., phone, email)

3. **Must include the following disclaimer:** By providing your information you are granting permission for a licensed sales agent to contact you by phone, mail, or email to answer your questions or provide additional information about Medicare Advantage Plans, Part D Prescription Drug Plans or Medicare Supplement Insurance.

4. **Do not** require any consumer contact information other than name and mailing address

5. **Do not** ask for Date of Birth (DOB)

6. **Do not** request medical or prescription drug history

### Use the below full plan titles:

Medicare Advantage Plans

Part D Prescription Drug Plans or Medicare Part D Prescription Drug Plans

Medicare Supplement Insurance/Medicare Supplement Insurance Plans

### Use of Social Media

The use of social media, including, but not limited to Facebook, LinkedIn, Twitter, etc., is subject to the same policies and regulations as websites.

***Below are the general discipline steps for non-adherence with Website guidelines provided within this policy. Steps may be added or removed at the discretion of the Copeland Group or the carrier.***

Websites that fail to meet the CMS guidelines and or the Health Plan guidelines will be given a set time to make corrections.

The set time will depend upon the corrections needed and the severity of the impact upon the consumer or Health Plan.

Websites found to be non-compliant will be directed by the Health Plan and /or Copeland Insurance Group Compliance Officer to immediately stop usage. Agents may be subject to progressive discipline including corrective action and/or up to including termination.