

Compliance Bulletin

Guidance for Formal/informal Event participation

CB0003-14

January 24, 2014

Agents:

We have received requests from agents for compliance guidance relating to the Centers for Medicare and Medicaid Services (CMS), carrier guidelines and applicable insurance regulations. From this e-mail address, you will only receive compliance information; there will be no product solicitation. Your reply to this e-mail acknowledges receipt and that you agree to receive Compliance Bulletins.

This document serves to be a resource for Agent-hosted events – both formal and informal. Please note this document does not replace carrier-specific trainings, but rather as a supplement to provide you with compliance reminders.

Event Scheduling

Carriers must notify CMS of all formal and informal marketing/sales events via Health Plan Management System (HPMS) prior to advertising the event or seven (7) calendar days prior to the event's scheduled date, whichever is earlier. Changes to marketing/sales events, (e.g., cancellations and room changes), should be updated in HPMS at least forty-eight (48) hours prior to the scheduled event.

NEW: Network Insurance must be copied on all United Healthcare event(s) scheduling and/or cancellation(s).

Cancellations

- Notification of cancelled sales events should be made at least forty-eight (48) hours prior to the originally scheduled date and time of the event.
- **If you are unable to attend a scheduled event, it is up to the agent/up-line to find a suitable replacement, per the carrier's guidelines.**

Carrier Guidelines

If the carrier has stricter event guidelines relating to event submission and/or cancellation, the carrier rules supersede the above-described guidelines.

Disciplinary action for non-adherence to guidelines:

The general discipline for non-adherence with event guidelines is set forth below. Steps may be added or removed at the discretion of the Company or carrier.

- First offense (Coaching) – as dictated by the carrier's disciplinary guidelines and additional corrective action, if any, as deemed by the Company's Compliance Department and/or the Company's leadership.
- Second offense (Corrective Action Plan (CAP)) – as dictated by the carrier's disciplinary guidelines and additional corrective action, if any, as deemed by the Company's Compliance Department and the Company's leadership.

Note: An agent "No Show" automatically warrants a CAP.

- Third offense – Disciplinary action up to and including possible termination of agent's capability to participate in future events.