



## Procedure - Informal/Formal Events

Effective Date: January 24, 2014

Topic	Policy	Procedure	Owner/Action
<p>Scheduled event attendance by agents, event compliance, and scoring from UHC's secret shopper program</p>	<p>See Policy L0019 – Marketing/Sales Events; Policy L0003 – Agent/Marketing Oversight Policy; Policy L0010 – Personal/Individual Marketing Appointments</p> <p>Reference: MMM 70.9 – Marketing/Sales Events – Reporting and Cancellation Guidelines</p>	<p><b>Event Scheduling – CMS Guidelines</b></p> <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. 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.</li> </ol> <p><b>Cancellations</b></p> <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. If an agent is unable to attend a scheduled event, it is up to the agent/up-line to find a suitable replacement, per the carrier's guidelines.</li> </ol> <p><b>UHC Guidelines</b></p> <ol style="list-style-type: none"> <li>1. Agents will report and/or cancel events through bConnected according to the UHC policy at least 14 days prior to the date of the event.</li> <li>2. Network Insurance must be copied on all United Healthcare event(s) scheduling and/or cancellation(s).</li> <li>3. Agents will follow UHC's guidelines for reporting events and notifying Network Insurance regarding events.</li> </ol> <p><b>Network Insurance Oversight</b></p> <p>Tools:</p> <ul style="list-style-type: none"> <li>- UHC-provided list of all Network agents that has been certified to participate in events by completing UHC's training module.</li> <li>- Spreadsheet of the month's events; agent and UHC provided.</li> <li>- Event secret shop tool</li> </ul> <p><b>Methodology:</b></p> <p>On a monthly basis:</p> <ol style="list-style-type: none"> <li>1. Agents submitting events will be cross-checked for completion of UHC's training module.</li> <li>2. Agents will be phoned two days in advance of the event date to ensure agent attendance; all contacts will be noted on the event spreadsheet.</li> <li>3. A Network representative will endeavor to secret shop 3% of all events and complete an event evaluation form. All documentation will be submitted to and the file maintained by Network Insurance</li> <li>4. Agents failing the secret shopper evaluation will result in corrective action which includes, but is not limited to:               <ol style="list-style-type: none"> <li>a) Three (3) or more failed event questions or failed event questions noted at multiple events;</li> <li>b) Display not set up correctly, signage not apparent or not adhering to CMS/UHC event guidelines;</li> <li>c) Agent "no show" at scheduled event.</li> </ol> </li> </ol>	<p>Network Insurance Leadership and the Compliance Department</p> <p><b>Methodology:</b></p> <p>Policies and procedure are communicated to agents through written and oral communications.</p> <ol style="list-style-type: none"> <li>a) Event spreadsheets;</li> <li>b) Phone</li> <li>c) Secret shop</li> <li>d) Compliance Bulletins:               <ul style="list-style-type: none"> <li>- January</li> <li>- February</li> <li>- March</li> <li>- April</li> <li>- May</li> <li>- June</li> <li>- July</li> <li>- August</li> </ul> </li> </ol>

Schedule subject to change at the reasonable discretion of Network Insurance.

**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.

UHC’s training and guidance informs agents to contact them directly with all event submissions/cancellations. On a bi-weekly basis, the Company will send event guidelines through Compliance Bulletins, tips on event participation and a reminder to agents that they need to copy Network Insurance with all UHC event submissions. Beginning in March 2014, any down line that does not copy Network on UHC event communication will receive a phone call from a Network representative with reminders and documentation will be maintained by Network Insurance. If the agent is a “repeat offender”, after two contacts have been made, the Compliance Department will begin formal corrective action.