

Marketing Guidance for Brokers

2014 Guidelines

How to get started with submitting materials for review...

- 1** **Review this document** thoroughly and ensure you understand the process a broker should follow when developing, creating, and submitting documents for review and approval. This *2014 Guidelines* document does not cover every example nor every disclaimer, just the most common instances.
- 2** **Review the 2014 CMS Medicare Marketing Guidelines** thoroughly to ensure you know and understand the requirements put in place by CMS to ensure proper marketing materials are created that do not mislead beneficiaries.
- 3** **Once a piece has been developed and completed**, submit all broker- or agency-created marketing materials to HSIntegrity@healthspring.com. Give yourself plenty of time to get the materials reviewed and approved.
- 4** **Broker and agencies** are not allowed to use any submitted marketing materials until they receive an "APPROVED" email from the Cigna-HealthSpring HSIntegrity@healthspring.com mailbox. Expected review timelines are included in this document, but the review process depends greatly on the broker or agency getting the materials to Cigna-HealthSpring in a timely manner to account for potential delays due to needed revisions to the materials or due to delays during peak review times (especially leading up to AEP).

At the end of this document, there are examples of how to use disclaimers and other items described herein.

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Follow these steps when developing marketing materials...

All marketing materials created by an agency or a broker with the intent of creating Medicare Advantage leads, must be reviewed and approved by Cigna-HealthSpring. This includes, but is not limited to, direct mail, advertising, posters, brochures, scripts, radio and television ads, letters, postcards, billboards and other outdoor advertising, banners, signs, yellow pages ads, church bulletin ads, web sites, etc.

Plan sponsors, like Cigna-HealthSpring, are responsible for all marketing materials used by their subcontractors – agencies and brokers.

The Cigna-HealthSpring Sales Integrity department is responsible for reviewing all marketing materials created by brokers or agencies.

It is expected that anyone involved in the development and submission of marketing materials familiarize themselves with the CMS Medicare Marketing Guidelines and Cigna-HealthSpring guidance regarding this subject.

Cigna-HealthSpring has created several customizable generic marketing pieces that can be used by brokers free of charge. Brokers will be responsible for all printing and distribution costs associated with these materials.

Cigna-HealthSpring is not a design and print shop resource for brokers. We are unable to create specific pieces for brokers, make adjustments to any of our pieces, or print pieces for brokers. We approve the pieces you create.

Please send all marketing materials needing approval to
HSIntegrity@healthspring.com

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General Guidance for all Marketing Materials...

General Guidance:

1. Font size of **all text**, even disclaimers, must be equivalent to or larger than Times New Roman 12-point (height and width). Condensed fonts are not allowed.
2. Items must be submitted in a Word or PDF document, and must be in the final format. No handwritten submissions.
3. Effective October 1, 2013, all materials using our company name and/or logo must be branded Cigna-HealthSpring. Please do not submit any pieces for approval with the old HealthSpring or BravoHealth names.
4. Agency /broker name and address must appear on the mailing envelope or postcard.
5. Please submit all pieces of a direct mailing, including the marketing piece, the envelope, business reply card, return envelope, etc., for review.
6. On a reply postcard, you may not ask for birthdates. This is considered PHI when on a reply card with the person's name.
7. Do not claim that you are endorsed by Medicare or CMS.

Choosing the right words...

1. If you are talking specifically about the Medicare program in your piece, use the phrase "Original Medicare."
2. Any time you mention a Medicare PDP drug plan, you must use the phrase "Part D Prescription Drug Plan."
3. Use caution when using the word "senior." There are Medicare beneficiaries under the age of 65.
4. Do not use the word "entitled." Use "eligible" or some other word instead.
5. Do not use absolute superlatives. Do not use "the best," or "highly rated," or "the most doctors," unless it can be substantiated.
6. If you mention premiums, make sure you list it as "monthly plan premiums," as in "monthly plan premiums as low as \$0."

All current marketing pieces with the Bravo Health or HealthSpring name or logo can no longer be used after September 30, 2013.

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Cigna-HealthSpring Marketing Materials Review Timelines...

Timelines:

- Initial Sales Integrity review – 2 business days
- Marketing Oversight review – 5 business days
- RMA review – 5 business days
- CMS review (if applicable) 45 calendar days

Be Prepared:

- If you need a piece for AEP, don't wait until October 1 to get it to us to review.
- If you are having a sales event, don't send us the flyer to approve just one week in advance. Plan ahead.
- Start thinking about Lock-In pieces before AEP ends.

Once you submit a piece for review and approval, you may not use it until you receive an “APPROVAL” email back from HSIntegrity@healthspring.com.

Plan Ahead! File Early!

Cigna-HealthSpring has its own busy periods, especially between August 1 and December 1, when we are trying to get our own documents and marketing materials approved. Many other brokers are trying to get their pieces approved as well. We take things in order and will not move a request to the front of the line just because it is needed quickly.

The timelines listed above are general and may be longer based upon overall workload. We cannot guarantee an approval date for any material submitted for review and approval.

On all approval requests, please include the state(s) the piece will be used in - HSIntegrity@healthspring.com 4

Follow these steps to ensure proper use of disclaimers...

General disclaimers:

1. This is an advertisement.
2. By providing the information above, I grant permission for a licensed sales person to contact me.
3. Calling the number above will direct you to a licensed sales agent.

Other required language:

4. Educational
5. Free with no obligation

Used when:

1. CMS actually lists this as a required mailing statement. It must be prominently displayed on the front of all envelopes and mailers.
2. A business reply card is included requesting information from a beneficiary.
3. Used on all pieces where a broker is asking for a prospect to call them.
4. All educational events must be specifically advertised as educational so it is clear to the beneficiary that it is not a sales/marketing event.
5. If the message promotes anything that is “free,” you must also include the phrase “without obligation.”

On all mailers, or on the front of all envelopes, **you must have** your name/agency name/logo and return address, and **you must have** the “This is an advertisement” statement. **You are not allowed** to have any other language or images on the envelope, or it automatically must go to CMS for review (45-day turnaround).

At the end of this document, there are examples of how to use disclaimers and other items described herein.

Follow these steps to ensure proper use of disclaimers...

Specific disclaimers:

6. <Org Name> is contracted with Medicare for HMO, PPO, and PDP plans and with select State Medicaid programs. Enrollment in <Org Name> depends on contract renewal.
7. Material ID#

Used when:

6. Must be used if our name/logo are used on the piece, or if benefits are listed. This disclaimer must be on a separate line and must be the last line of the disclaimer section.
7. A Material ID# will be assigned by Cigna-HealthSpring, and must be printed on the piece. The Material ID# format will vary depending on whether or not it has to be filed with CMS and depending on the market in which the piece will be used. Please reserve one line at the bottom of all marketing pieces for the Material ID#.

Items in carrots < > are variable fields to which detailed information can be added once the piece is approved. For example, you will replace <Org Name> with “Cigna-HealthSpring” once we approve the piece. In another example, if you want to personalize the piece for several states, you could submit only one piece with <state> in carrots, and replace <state> with the state name once you receive approval for your piece. Once you have made the changes to the variable fields, you are able to use the piece, but must provide Cigna-HealthSpring a final version.

Pieces can include multiple disclaimers. Please see the “Examples” section at the end for samples of how the various disclaimers are used.

Follow these steps to ensure proper use of disclaimers...

Specific disclaimers:

8. The benefit information provided is a brief summary, not a complete description of benefits. For more information contact the plan. Limitations, copayments, and restrictions apply. Benefits, formulary, pharmacy network, premium and/or copayments/co-insurance may change on January 1 of each year.
9. You must continue to pay your Medicare Part B premium.
10. You must reside in the plan service area. For more information, call Customer Service at <toll-free number> (TTY 711), <days and hours of operation>.

Used when:

8. This disclaimer must be used if you mention any plan benefits in the marketing piece.
9. This disclaimer must be used if you mention plan premiums, even if it is \$0.
10. If your radio/TV piece mentions Cigna-HealthSpring, you must include this disclaimer. The toll-free number and hours of operation are Cigna-HealthSpring-specific items.

Some pieces will include multiple disclaimers. Please see the “Examples” section for models of how the various disclaimers are used.

Follow these steps to ensure proper use of disclaimers...

Specific disclaimers:

11. Premiums, co-pays, co-insurance, and deductibles may vary based on the level of Extra Help you receive. Please contact the plan for further details.
12. A sales person will be present with information and applications. For accommodations of persons with special needs at sales meetings, call <toll-free number> (TTY 711), <days and hours of operation>.
13. Eligible for a free drawing and prizes with no obligation.

Used when:

11. Must be used on pieces mentioning cost-sharing or specifically targeting dual-eligible prospects.
12. Any advertisement or invitation to a sales/marketing event inviting beneficiaries to a group session to possibly enroll must include this disclaimer.
13. Required if piece promotes drawings, prizes, or any promise of a free gift.

Please save one last line at the bottom of each submitted piece to include a required Material ID# that must be printed on all pieces. 8

Direct Mail Requirements

2014 Guidelines

Follow these steps to ensure compliant direct mail pieces...

Front of postcard or envelope

- ✓ Company name and/or logo must be included along with return address
- ✓ Prospect's name and address < Name > < Address >
- ✓ The CMS mailing statement: "This is an advertisement."
- ✓ Any other wording or images on the envelope or self-mailer will result in the piece having to be approved by CMS
- ✓ Company/agent name and/or logo can be bracketed < > to be used by other agents without additional approval
- ✓ All text fonts must be 12-point or larger

Message

- ✓ All text fonts must be 12-point or larger
- ✓ All proper disclaimers must be included

Approval Timelines

- ✓ Using the HealthSpring name or logo – usually a 10-day review
- ✓ Listing benefits – usually a 10-day review
- ✓ Generic pieces – usually a 10-day internal review.
- ✓ Stand-alone business reply cards (BRC) – 45-day CMS review

Direct mail is the most common marketing piece we review and approve. We also see more errors on envelopes and mailing covers that cause delays in approval. In order to ensure a quick review, please keep these items as generic as possible – your name/agency name, logo, return address, and disclaimer. Do not include messages like "Urgent Review Needed," or "Time-Sensitive Material Enclosed." This will cause the piece to automatically undergo a CMS 45-day review.

Please send all marketing materials needing approval to
HSIntegrity@healthspring.com

Business Card Requirements

2014 Guidelines

Follow these steps to ensure compliant use of business cards...

Official Cigna-HealthSpring Business Cards

- ✓ Official Cigna-HealthSpring business cards are available to be purchased online at <https://custompoint.rrd.com>
- ✓ An official Cigna-HealthSpring business card may be included with any approved marketing piece, but **it may not be attached (stapled, paperclipped, etc.)** to the marketing piece.
- ✓ The Cigna-HealthSpring business card is a CMS-approved marketing piece. It cannot be used with a non-approved piece.

Your Own Business Card

- ✓ May be included with any other marketing piece, but **it may not be attached (stapled, paper-clipped, etc.)** to the marketing piece.
- ✓ You may use the Cigna-HealthSpring name on your “generic” business card, but you may not use the logo.
- ✓ You may not use the word “Medicare” in your title, like “Medicare Specialist” or “Authorized Medicare Agent.” This gives the impression to a beneficiary that you are affiliated or employed with CMS or Medicare.
- ✓ You may not list benefits on your business card,
- ✓ Use caution when using the images of flags or the colors of red, white, and blue that imply affiliation with a state or United States government agency.

If you have questions or concerns about your marketing pieces, contact HSIntegrity@healthspring.com

Broker/Agency Web Site Requirements

2014 Guidelines

Follow these steps to ensure compliant internet sites...

All website pages that mention Cigna-HealthSpring, use the Cigna-HealthSpring logo, or mention Medicare Advantage must be submitted for review and approval just like any other marketing materials.

- ✓ Submit printouts of the applicable web pages.
- ✓ Cigna-HealthSpring will review for appropriate content and compliance with the 2014 CMS Medicare Marketing Guidelines.
- ✓ After the Cigna-HealthSpring review, we will issue a “PENDING” Material ID# that must be placed on the website.
- ✓ Your website can then go live as we await official CMS approval.
- ✓ Once CMS approval is received, you will replace the word “PENDING” in the Material ID# with the word “APPROVED.”
- ✓ All modifications to the website will need to be submitted for review.

Social media is still a new area in the eyes of CMS, so be as generic as possible when posting anything online, including on:

- ✓ Your website
- ✓ Facebook
- ✓ LinkedIn
- ✓ YouTube
- ✓ Blogs
- ✓ Twitter

Anything that you produce that is intended specifically for agents does not need to be reviewed by Cigna-HealthSpring. However, unless you have a password-protected website for agents, anything you put online can be seen by anyone and, therefore, is subject to CMS Medicare Marketing Guidelines and Cigna-HealthSpring’s review and approval process.

Please send all websites needing approval to
HSIntegrity@healthspring.com

Examples

2014 Guidelines

A few examples to help guide you...

The goal of this document is to give brokers and agencies the tools, instructions, guidelines, and examples so you can submit marketing materials to Cigna-HealthSpring that are 100% correct and compliant on the first submission in order to get your request reviewed, processed, and approved as quickly as possible. Oftentimes there are changes or revisions that will have to be made, and we will respond back to you quickly in order to keep the process moving.

As a reminder, all pieces submitted for review are confidential, and we never share your marketing materials with any other agent or agency.

There are hundreds of different pieces that a broker or agency could develop, and by no means could we give an example of each and every option. Hopefully, the examples on the next four slides/pages will give you a general idea of the required elements and disclaimers that must appear on different pieces.

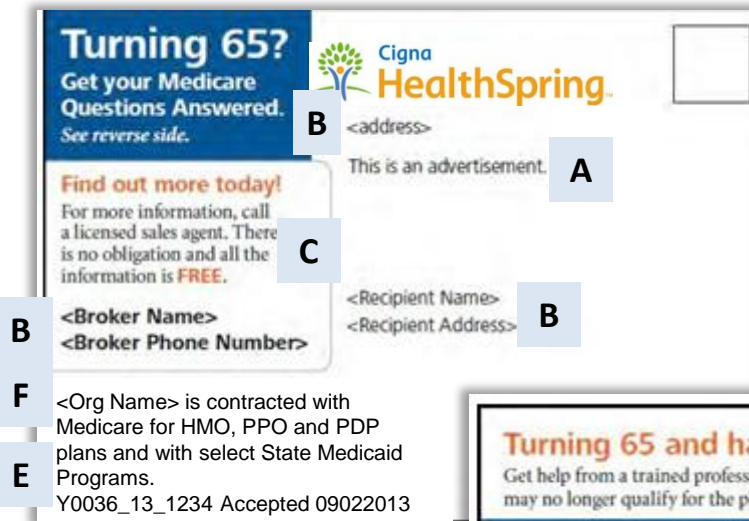
The Cigna-HealthSpring Sales Integrity department is your main resource for support when you are developing marketing materials. Although we cannot provide creative resources, nor can we suggest how successful your piece will be, we will ensure that it is compliant with all CMS regulations and guidelines.

We are here to offer guidance to you as you create and develop marketing materials. Please feel free to reach out to us for guidance at HSIntegrity@healthspring.com

Examples

2014 Guidelines

Generic Postcard With Cigna-HealthSpring Name and Logo



Notes

- A. "This is an advertisement." appears on the front of the card.
- B. Many variable fields are printed with carrots < > to designate fields that can be customized. If piece is being used by a single broker, fill in the correct information.
- C. Note the word "free" is used in conjunction with "no obligation."
- D. Disclaimer included because you are asking the beneficiary to call you.
- E. All items are required to have a unique identification number that must be printed on the item.
- F. Disclaimer for using Cigna-HealthSpring name and/or logo.

Examples

2014 Guidelines

Generic Postcard Without Cigna-HealthSpring Name and Logo

TURNING 65?

GET YOUR MEDICARE
QUESTIONS ANSWERED.

See reverse side.

Find out more today!

For more information, call
a licensed agent. There is
no obligation and all the
information is **FREE**.

<Broker Name>
<Broker Phone Number>

BH_12_0026 09232011

<return address>

B

<indicia>

This is an advertisement.

A

<RECIPIENT NAME>

<RECIPIENT ADDRESS>

B

Turning 65 and have questions about Medicare?

Get help from a trained professional. After your initial enrollment period ends, you may no longer qualify for the plan you need until next year. Here are some important dates below regarding enrollment:

4 MONTHS BEFORE you turn 65, get more information about Medicare so you know all of your Medicare options *before* enrolling.

3 MONTHS BEFORE you turn 65, enroll in Original Medicare. After you have enrolled in Parts A & B, you can then also enroll in a Medicare Advantage plan (Part C).

THE MONTH YOU TURN 65, just relax...You're covered!

Find out more today!

For more information, call a licensed agent.
There is no obligation and all the information is **FREE**.

<Broker Name> – <Broker Phone Number>

Calling the number above will direct you to a licensed sales agent.

D

Notes

A. "This is an advertisement." appears on the front of the card.

B. Many variable fields are printed with carrots < > to designate fields that can be customized. If piece is being used by a single broker, fill in the correct information.

C. Note the word "free" is used in conjunction with "no obligation."

D. Disclaimer included because you are asking the beneficiary to call you.

E. All items are required to have a Material ID# that must be printed on the item.

Marketing Materials That Include Benefits

Get the benefits you want with a Medicare Advantage plan.
 If you are enrolled in Medicare Parts A & B and live in the Medicare-approved area, you may be eligible for a Medicare Advantage plan that provides benefits such as:

A **\$0 Monthly Plan Premium • Part D Prescription Drugs
 Routine Dental • Gym Membership • \$0 Preventive Services**

Complete and mail this reply card or call a licensed agent for more information:

G **<Broker Name>
 <Broker Phone Number>**

B **<NAME>
 <ADDRESS>**

E **<Org Name>** is contracted with Medicare for HMO, PPO and PDP plans and with select State Medicaid Programs.

D By providing the information above, I grant permission for a licensed sales person to contact me. The benefit information provided is a brief summary, not a complete description of benefits. For more information contact the plan. Limitations, copayments, and restrictions apply. Benefits, formulary, pharmacy network, premium and/or copayments/co-insurance may change on January 1 of each year.

F Y0036_13_4829

C

Name: _____
 Phone: _____
 E-mail: _____

Notes

- A.** Since benefits are listed...
- B.** ...this disclaimer is required...
- C.** ...as is this one.
- D.** This disclaimer included because you are asking the beneficiary for permission to contact them.
- E.** The <toll-free> number in this disclaimer must be populated with the Cigna-HealthSpring Sales Customer Service number.
- F.** All items are required to have a Material ID# that must be printed on the item.
- G.** Many variable fields are printed with carrots < > to designate fields that can be customized. If piece is being used by a single broker, fill in the correct information.

Generic Ad Without Cigna-HealthSpring Name and Logo

Take advantage of all the benefits you are eligible for through Medicare.

All Medicare Beneficiaries need this important information!

MEDICARE ANNUAL ELECTION PERIOD (AEP) is a limited-time opportunity to get benefits that you are entitled to, where coverage cannot be denied. Get a trained professional to help with this important decision. After this period ends, you may no longer qualify for the plan you need until next year. Make sure you know all of your options. The choice you make could save hundreds or even thousands of dollars each year.

Find out more today!

For more information, call a licensed agent at the number below.

There is no obligation and all the information is **FREE.** **B**

A **<Broker Name> – <Broker Phone #>**

Calling the number above will direct you to a licensed sales agent. **C**

HS_13_7270 02252013 **D**

Notes

A. Variable fields are printed with carrots < > to designate fields that can be customized. If piece is being used by a single broker, fill in the correct information.

B. Note the word “free” is used in conjunction with “no obligation.”

C. Disclaimer included because you are asking the beneficiary to call you.

D. All items are required to have a Material ID# that must be printed on the item.

Resources Available

2014 Guidelines

The following guidance documents are available online for brokers...

CMS Medicare Marketing Guidelines

Marketing guidance issued annually by CMS which covers all materials developed and/or distributed by brokers and agencies that target Medicare beneficiaries.

<http://www.cms.gov/Medicare/Health-Plans/ManagedCareMarketing/FinalPartCMarketingGuidelines.html>

Generic Marketing Pieces for Brokers

A catalog of generic direct marketing pieces created by Cigna-HealthSpring for use by its contracted brokers. **2014 pieces will be available for download on September 15, 2013.**

<http://www.healthspring.com/agentresources>

Marketing Submission Checklist

A checklist developed as a resource for brokers to follow as they create and develop marketing pieces.

<http://www.healthspring.com/agentresources>