

Title: Pre-AEP Paper Application Guidance

Date: September 26, 2013

As we fast approach the Pre-AEP period between October 1st and October 14th, it is important to note that there are some very specific and important application handling guidelines that ALL agents must follow in order to stay compliant. Please read these guidelines over very carefully, as they will help you navigate the Pre-AEP waters compliantly.

During Pre-AEP, agents are allowed to meet with beneficiaries, assess their needs, review plan changes and options, give a full product presentation, and make recommendations on coverage that will best meet the beneficiaries' needs over the next year. One of the most important things to remember during Pre-AEP is that while agents can assist a beneficiary in completing a paper application they cannot encourage completion, solicit, accept, take possession of, or "just hold on to" any applications for the 2014 contract year prior to AEP, October 15, 2013. Agents should instruct the beneficiary that they want to enroll in our plan, they should sign, date and mail in the application for receipt by Humana once AEP has started on October 15th.

New CMS Guidance!

New CMS enrollment guidance has been issued this year that demonstrates CMS concerted efforts to curtail agent-solicited applications during the Pre-AEP period. In Chapter 2&3 it states:

"Paper AEP enrollment requests received prior to the start of the AEP for which there is indication of sales agent or broker involvement in the submission of the request (i.e., the name or contact information of a sales agent or broker) must be investigated by the organization for compliance with the requirements in the Medicare Marketing Guidelines."

This means that Humana must investigate any application that it receives prior to October 15, 2013 that has an agent name on it. **As a result, it is EXTREMELY important to reinforce to enrollees that the application should NOT be sent to Humana before 10/15/13.**

Humana will be conducting an investigation for any paper application received by mail through October 15, 2013 (Paper applications received on the 15th had to have been mailed/collected prior to the 15th). In instances where an agent is suspected of accepting and/or mailing an application, further investigation will be made with appropriate corrective action. Founded allegations where an agent collected or solicited Pre-AEP applications in the past have resulted in agent termination.

Previous guidance from Sales Integrity indicated that agents should inform the enrollee to mail the application so that Humana receives it on or around October 15th. This may have resulted in applications being received inadvertently prior to AEP. In order to avoid agent investigations going forward, **we are changing this guidance.** Agents should now direct enrollees to mail the application ON October 15th to ensure that the application is received during AEP.

Important Pre-AEP Reminders

- No advertising of 2014 AEP or marketing of 2014 plan benefits may begin until October 1st.
- An agent may give a full disclosure presentation using the 2014 sales presentation and summary of benefits beginning October 1, 2013.
- An agent may assist a prospect in completing a 2014 paper enrollment application beginning October 1, 2013. The agent should place his/her name and SAN on the application, but the agent should **NOT** date the application. A signature date by the agent name would signify Humana taking possession of the application. Therefore, during Pre-AEP it is critical that you **DO NOT** date the application.
- Agents should not guide the applicant to sign or date it during the pre-AEP, but instead should encourage applicants to sign and date it the day they actually mail it, between October 15 and December 7 (not earlier than 10/15).
- **Important note:** The Humana enrollment department must receive the application by December 7, 2013 in order for it to be considered a valid AEP enrollment. CMS requires us to go by “receipt date” **not postmarked date.**
- An agent must leave the entire application with the member along with an envelope addressed to: Humana Medicare Enrollment, 2432 Fortune Drive, Lexington, KY 40509. The agent must also state that the application should be sent to Humana for receipt after October 15th. Do not coach applicants **to send in the application to Humana for receipt prior to the October 15th date.** As a reminder, any application received prior to the start of AEP with an agent name on it will result in an investigation to determine if the agent took possession of or solicited the application prior to AEP.

Beginning October 15, 2013 agents can begin accepting enrollment applications and should date them appropriately.

A complete set of the Chapter 3 Marketing Guidelines may be found on CMS' website at the following web address:

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