

## WellCare Marketing Regulations: Event Definition Tool

Event Planning			
Definitions/Permissible Activities	Educational Events	Formal Sales Events	Informal Sales Events
<b>Definition</b>	<ul style="list-style-type: none"> <li>Event designed to <u>inform</u> Medicare beneficiaries about Medicare Advantage, Prescription Drug or other Medicare programs and does NOT include sales and/or marketing.</li> <li>Event usually sponsored by outside entity and advertised as “educational.”</li> <li>Event intended to be informational/ educational in nature.</li> <li>You must NOT steer or attempt to steer potential members towards a plan.</li> </ul>	<ul style="list-style-type: none"> <li>Event sponsored and conducted by a plan with the purpose of “marketing to, and steering, or attempting to steer, potential members towards a specific or limited number of plans”.</li> <li>Includes a formal, structured sales presentation planned or given to a group. Ability to set 1:1 appointments for individual needs assessment after the event has taken place. Scope of appointment must be obtained prior to a 1:1 appointment.</li> </ul>	<ul style="list-style-type: none"> <li>Event sponsored and conducted by a plan in a less structured or less formal environment, typically a manned table, kiosk etc.</li> <li>Activity paid for and conducted by the plan with the purpose of “marketing to, and steering, or attempting to steer, potential members towards a specific or limited number of plans”.</li> <li>No formal group presentation planned, but proactive interactions with beneficiaries requesting information, future follow-up or with specific questions about the plan. Ability to set 1:1 appointments for individual needs assessment after the event has taken place. Scope of appointment must be obtained prior to a 1:1 appointment.</li> </ul>
<b>Applies To / Also Called</b>	<ul style="list-style-type: none"> <li>Educational events only.</li> <li>Health fairs can be considered educational if they do not include any sales activities such as the distribution of marketing materials or the distribution or collection of plan applications.</li> </ul>	<ul style="list-style-type: none"> <li>Traditional seminars, group sales events or presentations.</li> </ul>	<ul style="list-style-type: none"> <li>Table and chair activities/events.</li> <li>Any public setting in which we establish a “presence” and a formal sales presentation is not planned.</li> <li>Other “street” marketing (e.g., kiosks, lemonade stands, etc.)</li> <li>Health/Wellness fairs.</li> </ul>
<b>Loaded in Salesforce* As</b>	<ul style="list-style-type: none"> <li>Educational event</li> </ul>	<ul style="list-style-type: none"> <li>Formal Sales Event</li> </ul>	<ul style="list-style-type: none"> <li>Informal Sales Event</li> </ul>
<b>Key parameters</b>	<ul style="list-style-type: none"> <li>Materials available must be free of plan-specific information like premiums, co-payments, contact information and any bias toward one plan type over another.</li> <li>Events cannot be held at in-home</li> </ul>	<ul style="list-style-type: none"> <li>Planned in advance.</li> <li>Attendees invited and/or event is advertised.</li> <li>Structured, audience-presenter style.</li> <li>Products to be covered and</li> </ul>	<ul style="list-style-type: none"> <li>Locations must be fully confirmable and NEVER subject to change on short notice.</li> <li>Must adhere to back-up coverage procedures.</li> <li>Must adhere to additions, change</li> </ul>

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	<p>or one-on-one settings.</p> <ul style="list-style-type: none"> <li>Events may not include any sales activities such as the distribution of marketing materials or the distribution or collection of plan applications.</li> </ul> <p>You <b><u>MAY</u></b>:</p> <ul style="list-style-type: none"> <li>-Use a banner with the plan name and/or logo displayed.</li> <li>-Use promotional items, including those with plan name, logo and toll-free customer service number and/or website. Promotional items must be free of benefit information and of nominal value at \$15 or less per beneficiary.</li> <li>-Conduct raffles and drawings at a maximum nominal value of \$15 per anticipated attendee.</li> </ul> <p><b>Note:</b> Nominal gifts may not be in the form of cash or other monetary rebates regardless of their value.</p> <ul style="list-style-type: none"> <li>-Use RV's for advertising ONLY.</li> </ul> <p>You may <b><u>NOT</u></b>:</p> <ul style="list-style-type: none"> <li>-Respond to product questions asked at an educational event.</li> <li>-Advertise an educational event and then have a marketing/sales event immediately following in the same general location (e.g., same hotel.)</li> </ul>	<p>advertised/ announced in advance.</p> <ul style="list-style-type: none"> <li>Conducted at a fixed location with an address and venue contact (e.g., an auditorium, meeting/ conference room, restaurant, and senior center lounge or community partner site.)</li> </ul> <p>You <b><u>MAY</u></b>:</p> <ul style="list-style-type: none"> <li>-Conduct raffles and drawings at a maximum nominal value of \$15 per anticipated attendee.</li> </ul> <p><b>Note:</b> Nominal gifts may not be in the form of cash or other monetary rebates regardless of their value.</p> <ul style="list-style-type: none"> <li>-Use RV's for advertising and 1:1 appointments.</li> </ul>	<p>and cancellation procedures.</p> <ul style="list-style-type: none"> <li>Same scheduling, reporting and coverage requirements as formal events.</li> </ul> <p>You <b><u>MAY</u></b>:</p> <ul style="list-style-type: none"> <li>-Use RV's for advertising and 1:1 appointments.</li> </ul>
<b>Principal purpose</b>	Education	Marketing/Selling	Marketing/Selling

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<b>Ability to serve food</b>	<p>YES</p> <p>Permissible items are as follows:</p> <ul style="list-style-type: none"> <li>Subsidized meals</li> </ul>	<p>YES</p> <p>Permissible items are as follows:</p> <ul style="list-style-type: none"> <li>Fruit</li> <li>Raw vegetables</li> <li>Pastries</li> <li>Cookies or other small bite sized desserts</li> <li>Crackers</li> <li>Muffins</li> <li>Cheese</li> <li>Chips</li> <li>Yogurt</li> <li>Nuts</li> </ul>	<p>YES</p> <p>Permissible items are as follows:</p> <ul style="list-style-type: none"> <li>Fruit</li> <li>Raw vegetables</li> <li>Pastries</li> <li>Cookies or other small bite sized desserts</li> <li>Crackers</li> <li>Muffins</li> <li>Cheese</li> <li>Chips</li> <li>Yogurt</li> <li>Nuts</li> </ul>
<b>Event Timing</b>	<ul style="list-style-type: none"> <li>Plan to arrive in time to setup and begin the presentation at the scheduled start time in Salesforce* CMS/WellCare surveillance expects events to start on time.</li> <li>If the event has no attendees AND 30 minutes have passed from the event start time in Salesforce*; the Host may leave after 30 minutes from the event start time.</li> <li>Minimum event time is 1 hour, excluding setup.</li> </ul>	<ul style="list-style-type: none"> <li>Plan to arrive in time to setup and begin the presentation at the scheduled start time in Salesforce* CMS/WellCare surveillance expects events to start on time.</li> <li>If the event has no attendees AND 30 minutes has passed from the event start time in Salesforce*; the Host may leave after 30 minutes from the event start time.</li> <li>Minimum event time is 1 hour, excluding setup.</li> </ul>	<ul style="list-style-type: none"> <li>Plan to arrive in time to setup the tabletop, according to the "compliant table" guidance, and to begin at the scheduled start time in Salesforce* CMS/WellCare surveillance expects events to start on time.</li> <li>Host must attend for the entire time scheduled in Salesforce*</li> <li>Host may leave the event ONLY if there is an alternate event Host present.</li> <li>Minimum event time is 1 hour, excluding setup.</li> <li>Hosts may stay past the set end time.</li> <li>Events should only be scheduled for 1 hour or based on direction from market leadership.</li> </ul>
<b>Ability to conduct such an event at a "vulnerable populations" site</b>	<p>YES, but</p> <ul style="list-style-type: none"> <li>Must have written permission</li> </ul>	<p>YES, but</p> <ul style="list-style-type: none"> <li>Must have written permission</li> </ul>	<p>YES, but</p> <ul style="list-style-type: none"> <li>Must have written permission</li> </ul>

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serving prepared meals	<p>from the facility on file in Salesforce*</p> <ul style="list-style-type: none"> <li>Must not be present one hour prior, during and one hour after food is being served.</li> <li>Refer to Site Based Marketing Guide for further details.</li> </ul>	<p>from the facility on file in Salesforce*</p> <ul style="list-style-type: none"> <li>Must not be present one hour prior, during and one hour after food is being served.</li> <li>Refer to Site Based Marketing Guide for further details.</li> </ul>	<p>from the facility on file in Salesforce*</p> <ul style="list-style-type: none"> <li>Must not be present one hour prior, during and one hour after food is being served.</li> <li>Refer to Site Based Marketing Guide for further details.</li> </ul>
Ability to conduct such an event at a “vulnerable populations” site distributing groceries	<p>YES, but</p> <ul style="list-style-type: none"> <li>Must have written permission from the facility on file in Salesforce*</li> <li>Location of WellCare Benefit Consultant must be a minimum of 25 feet away from grocery distribution or a physically separated space, such as a meeting room or office.</li> <li>WellCare Benefit Consultants should not engage in conduct that would suggest that enrolling with WellCare is a condition of obtaining food or services.</li> <li>Refer to Site Based Marketing Guide for further details.</li> </ul>	<p>YES, but</p> <ul style="list-style-type: none"> <li>Must have written permission from the facility on file in Salesforce*</li> <li>Location of WellCare Benefit Consultant must be a minimum of 25 feet away from grocery distribution or a physically separated space, such as a meeting room or office.</li> <li>WellCare Benefit Consultants should not engage in conduct that would suggest that enrolling with WellCare is a condition of obtaining food or services.</li> <li>WellCare Benefit Consultants must display appropriate signage notifying attendees that WellCare is not associated with the food.</li> <li>Refer to Site Based Marketing Guide for further details.</li> </ul>	<p>YES, but</p> <ul style="list-style-type: none"> <li>Must have written permission from the facility on file in Salesforce*</li> <li>Location of WellCare Benefit Consultant must be a minimum of 25 feet away from grocery distribution or a physically separated space, such as a meeting room or office.</li> <li>WellCare Benefit Consultants should not engage in conduct that would suggest that enrolling with WellCare is a condition of obtaining food or services.</li> <li>WellCare Benefit Consultants must display appropriate signage notifying attendees that WellCare is not associated with the food.</li> <li>Refer to Site Based Marketing Guide for further details.</li> </ul>

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Ability to conduct such an event at “3 <sup>rd</sup> Party” sponsored events, where multiple entities are present and free food is being distributed	YES	NO	YES, but <ul style="list-style-type: none"> <li>Engagement with a WellCare representative is not a contingency of receiving food.</li> <li>WellCare is not associated in any way (subsidization or distribution) with the food.</li> <li>Proximity of the WellCare event should not lead to misinterpretation that WellCare is in any way associated with the food.</li> <li>WellCare Benefit Consultants must display appropriate signage notifying attendees that WellCare is not associated with the food.</li> </ul>

Event Advertising			
Definitions/Permissible Activities	Educational Events	Formal Sales Events	Informal Sales Events
Can be advertised in WellCare Print or Direct Mail	YES, but: <ul style="list-style-type: none"> <li>Not comingled with Sales and Marketing Events</li> <li>Using proper disclaimer</li> </ul>	YES <ul style="list-style-type: none"> <li>Minimum lead/approval time:               <ul style="list-style-type: none"> <li>Non-advertised events: 10 days</li> <li>Direct Mail: 30 days</li> <li>Print: 16 days</li> </ul> </li> </ul> <b>NOTE:</b> Longer lead time will allow for further exposure for print placements.	YES <ul style="list-style-type: none"> <li>Minimum lead/approval time:               <ul style="list-style-type: none"> <li>Non-advertised events: 10 days</li> <li>Direct Mail: 30 days</li> <li>Print: 16 days</li> </ul> </li> </ul> <b>NOTE:</b> Longer lead time will allow for further exposure for print placements.
Advertisements and Marketing Materials needs to be approved by CMS	YES <ul style="list-style-type: none"> <li>Per WellCare’s policy</li> </ul>	YES	YES

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Advertisement needs to include scope of product language and disclaimers	NO	YES	YES
Advertisement needs to include educational event disclaimer	YES	N/A	N/A

Event Execution			
Definitions/Permissible Activities	Educational Events	Formal Sales Events	Informal Sales Events
Required to Report to CMS	YES • Per WellCare's policy	YES	YES
Business cards can be made passively available on the table, or handed to a beneficiary who requests contact information	NO • Cannot be displayed • Business cards can only be provided IF the beneficiary request contact information.	YES • Can be displayed • Business cards can only be provided IF the beneficiary request contact information.	YES • Can be displayed • Business cards can only be provided IF the beneficiary request contact information.
Ability to distribute and collect consent forms (BRCs, or conduct other lead gathering)	NO • Cannot require beneficiary to complete a C2C card.	YES • Cannot require beneficiary to complete a C2C card.	YES • Cannot require beneficiary to complete a C2C card.
Ability to distribute plan benefit information (e.g., pre-sale info, BOs, etc.)	NO	YES	YES
Ability to conduct a compliant sales presentation	NO	Group Presentation & Individual Presentation:  Reference " <b>Ability to conduct an <u>immediate</u> appointment using AVL.</b> "	Individual Presentation:  Reference " <b>Ability to conduct an <u>immediate</u> appointment using AVL.</b> "

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Event Execution			
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<b>Mandatory Attendance after event cancellation</b>	<p>YES, if:</p> <ul style="list-style-type: none"> <li>Event was requested for advertising</li> <li>Note: Mandatory attendance is 30 minutes, beginning at the documented Salesforce* start time.</li> </ul>	<p>YES, if:</p> <ul style="list-style-type: none"> <li>Event was requested for advertising</li> <li>Note: Mandatory attendance is 30 minutes, beginning at the documented Salesforce* start time.</li> </ul>	<p>YES, if:</p> <ul style="list-style-type: none"> <li>Event was requested for advertising</li> <li>Note: Mandatory attendance is 30 minutes, beginning at the documented Salesforce* start time.</li> </ul>
<b>Key Parameters</b>	<p>You may <b>NOT</b>:</p> <ul style="list-style-type: none"> <li>-Discuss any health related topics.</li> <li>-Discuss plan-specific premiums and/or benefits.</li> <li>-Distribute plan specific materials.</li> <li>-Distribute or display business reply cards, scope of appointment forms, enrollment forms or sign-in sheets.</li> <li>-Set up individual sales appointments or get permission for an outbound call to the beneficiary.</li> </ul>	<p>You may <b>NOT</b>:</p> <ul style="list-style-type: none"> <li>-Conduct health screenings or other like activities that could give the impression of "cherry picking."</li> <li>-Require beneficiaries to provide any contact information as a prerequisite for attending the event (i.e. Requiring an e-mail address or any other contact information as a condition to RSVP for an event online or through mail.)</li> <li>-Distribute or display sign-in sheets.</li> <li>-Use personal contact information obtained to notify individuals of raffle or drawing winnings for any other purpose.</li> </ul>	<p>You may <b>NOT</b>:</p> <ul style="list-style-type: none"> <li>-Conduct health screenings or other like activities that could give the impression of "cherry picking."</li> <li>-Require beneficiaries to provide any contact information as a prerequisite for attending the event (i.e. Requiring an e-mail address or any other contact information as a condition to RSVP for an event online or through mail.)</li> <li>-Distribute or display sign-in sheets.</li> <li>-Use personal contact information obtained to notify individuals of raffle or drawing winnings for any other purpose.</li> </ul>

1:1			
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<b>Ability to conduct an <u>immediate</u> appointment using AVL</b>	NO	<p>YES, but:</p> <ul style="list-style-type: none"> <li>Hosts can perform an immediate appointment after the AVL and move to a 1:1 meeting if: <ul style="list-style-type: none"> <li>1) 1 beneficiary is in attendance OR</li> </ul> </li> </ul>	<p>YES, but:</p> <ul style="list-style-type: none"> <li>Hosts can perform an immediate appointment after the AVL and move to a 1:1 meeting if: <ul style="list-style-type: none"> <li>1) there is an alternate host OR</li> </ul> </li> </ul>

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1:1			
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		<ul style="list-style-type: none"> <li>– 2) the event group presentation has completed</li> <li>• Hosts must wait a minimum of 15 minutes from the event start time before transitioning to a 1:1 meeting.</li> <li>• All 1:1 meetings must be able to ensure Privacy and utilize the AVL.</li> <li>• Hosts may utilize the 15 minute wait time to initiate AVL.</li> </ul>	<ul style="list-style-type: none"> <li>– 2) the event has completed based on the end time set in Salesforce* AND</li> <li>– 3) all commitments with the venue have been met</li> <li>• All 1:1 meetings must be able to ensure Privacy and utilize the AVL.</li> <li>• Producer must fulfill minimum scheduled time before moving to a 1:1 appointment.</li> </ul>
Ability to set up <u>future</u> appointments via AVL	NO	YES	YES
Ability to take applications/enroll beneficiaries	NO	YES, if: <ul style="list-style-type: none"> <li>• After group presentation, AVL and 1:1 appointment where the Summary of Benefits is covered in full.</li> </ul>	YES, if: <ul style="list-style-type: none"> <li>• After group presentation, AVL and 1:1 appointment where the Summary of Benefits is covered in full.</li> </ul>