

WellCare Marketing Regulations: Event Definition Tool

Event Planning			
Definitions/Permissible Activities	Educational Events	Formal Sales Events	Informal Sales Events
Definition	<ul style="list-style-type: none"> 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. Event usually sponsored by outside entity and advertised as “educational.” Event intended to be informational/ educational in nature. You must NOT steer or attempt to steer potential members towards a plan. 	<ul style="list-style-type: none"> 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”. 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. 	<ul style="list-style-type: none"> Event sponsored and conducted by a plan in a less structured or less formal environment, typically a manned table, kiosk etc. 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”. 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.
Applies To / Also Called	<ul style="list-style-type: none"> Educational events only. 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. 	<ul style="list-style-type: none"> Traditional seminars, group sales events or presentations. 	<ul style="list-style-type: none"> Table and chair activities/events. Any public setting in which we establish a “presence” and a formal sales presentation is not planned. Other “street” marketing (e.g., kiosks, lemonade stands, etc.) Health/Wellness fairs.
Loaded in Salesforce* As	<ul style="list-style-type: none"> Educational event 	<ul style="list-style-type: none"> Formal Sales Event 	<ul style="list-style-type: none"> Informal Sales Event
Key parameters	<ul style="list-style-type: none"> Materials available must be free of plan-specific information like premiums, co-payments, contact information and any bias toward one plan type over another. Events cannot be held at in-home 	<ul style="list-style-type: none"> Planned in advance. Attendees invited and/or event is advertised. Structured, audience-presenter style. Products to be covered and 	<ul style="list-style-type: none"> Locations must be fully confirmable and NEVER subject to change on short notice. Must adhere to back-up coverage procedures. Must adhere to additions, change

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	<p>or one-on-one settings.</p> <ul style="list-style-type: none"> Events may not include any sales activities such as the distribution of marketing materials or the distribution or collection of plan applications. <p>You <u>MAY</u>:</p> <ul style="list-style-type: none"> -Use a banner with the plan name and/or logo displayed. -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. -Conduct raffles and drawings at a maximum nominal value of \$15 per anticipated attendee. <p>Note: 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"> -Use RV's for advertising ONLY. <p>You may <u>NOT</u>:</p> <ul style="list-style-type: none"> -Respond to product questions asked at an educational event. -Advertise an educational event and then have a marketing/sales event immediately following in the same general location (e.g., same hotel.) 	<p>advertised/ announced in advance.</p> <ul style="list-style-type: none"> 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.) <p>You <u>MAY</u>:</p> <ul style="list-style-type: none"> -Conduct raffles and drawings at a maximum nominal value of \$15 per anticipated attendee. <p>Note: 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"> -Use RV's for advertising and 1:1 appointments. 	<p>and cancellation procedures.</p> <ul style="list-style-type: none"> Same scheduling, reporting and coverage requirements as formal events. <p>You <u>MAY</u>:</p> <ul style="list-style-type: none"> -Use RV's for advertising and 1:1 appointments.
Principal purpose	Education	Marketing/Selling	Marketing/Selling

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Ability to serve food	<p style="text-align: center;">YES</p> <p>Permissible items are as follows:</p> <ul style="list-style-type: none"> • Subsidized meals 	<p style="text-align: center;">YES</p> <p>Permissible items are as follows:</p> <ul style="list-style-type: none"> • Fruit • Raw vegetables • Pastries • Cookies or other small bite sized desserts • Crackers • Muffins • Cheese • Chips • Yogurt • Nuts 	<p style="text-align: center;">YES</p> <p>Permissible items are as follows:</p> <ul style="list-style-type: none"> • Fruit • Raw vegetables • Pastries • Cookies or other small bite sized desserts • Crackers • Muffins • Cheese • Chips • Yogurt • Nuts
Event Timing	<ul style="list-style-type: none"> • 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. • 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. • Minimum event time is 1 hour, excluding setup. 	<ul style="list-style-type: none"> • 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. • 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. • Minimum event time is 1 hour, excluding setup. 	<ul style="list-style-type: none"> • 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. • Host must attend for the entire time scheduled in Salesforce* • Host may leave the event ONLY if there is an alternate event Host present. • Minimum event time is 1 hour, excluding setup. • Hosts may stay past the set end time. • Events should only be scheduled for 1 hour or based on direction from market leadership.
Ability to conduct such an event at a “vulnerable populations” site	<p style="text-align: center;">YES, but</p> <ul style="list-style-type: none"> • Must have written permission 	<p style="text-align: center;">YES, but</p> <ul style="list-style-type: none"> • Must have written permission 	<p style="text-align: center;">YES, but</p> <ul style="list-style-type: none"> • Must have written permission



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



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

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



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Event Advertising			
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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 " Ability to conduct an <u>immediate</u> appointment using AVL."	Individual Presentation: Reference " Ability to conduct an <u>immediate</u> appointment using AVL."

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

1:1			
Definitions/Permissible Activities	Educational Events	Formal Sales Events	Informal Sales Events
Ability to conduct an <u>immediate</u> appointment using AVL	NO	<p style="text-align: center;">YES, but:</p> <ul style="list-style-type: none"> Hosts can perform an immediate appointment after the AVL and move to a 1:1 meeting if: <ul style="list-style-type: none"> 1) 1 beneficiary is in attendance OR 	<p style="text-align: center;">YES, but:</p> <ul style="list-style-type: none"> Hosts can perform an immediate appointment after the AVL and move to a 1:1 meeting if: <ul style="list-style-type: none"> 1) there is an alternate host OR

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1:1			
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		<ul style="list-style-type: none"> <li style="margin-left: 40px;">– 2) the event group presentation has completed • Hosts must wait a minimum of 15 minutes from the event start time before transitioning to a 1:1 meeting. • All 1:1 meetings must be able to ensure Privacy and utilize the AVL. • Hosts may utilize the 15 minute wait time to initiate AVL. 	<ul style="list-style-type: none"> <li style="margin-left: 40px;">– 2) the event has completed based on the end time set in Salesforce* AND <li style="margin-left: 40px;">– 3) all commitments with the venue have been met • All 1:1 meetings must be able to ensure Privacy and utilize the AVL. • Producer must fulfill minimum scheduled time before moving to a 1:1 appointment.
Ability to set up <u>future</u> appointments via AVL	NO	YES	YES
Ability to take applications/enroll beneficiaries	NO	<p style="text-align: center;">YES, if:</p> <ul style="list-style-type: none"> • After group presentation, AVL and 1:1 appointment where the Summary of Benefits is covered in full. 	<p style="text-align: center;">YES, if:</p> <ul style="list-style-type: none"> • After group presentation, AVL and 1:1 appointment where the Summary of Benefits is covered in full.