



Nonprofit corporations and independent licensees  
of the Blue Cross and Blue Shield Association

## Medicare Advantage Website Policy

Revised August 2014

### Scope

All managing agents, general agents, and producing agents whose public websites provide information about Blue Cross Blue Shield of Michigan or Blue Care Network individual Medicare Advantage plan options, are responsible for coordinating website approvals as outlined in this policy.

### General policy

All agents and/or agencies who choose to use Web technology to promote BCBSM and BCN plans must comply with the *Blue Cross Blue Shield of Michigan and Blue Care Network Advertising and Social Media Guidelines for Agents, Associations and Chambers*.

All agents annually certified to sell BCBSM or BCN Medicare Advantage plans and managing agents and general agents whose websites include information about our Medicare Advantage plan options must also:

- Meet all Centers for Medicare & Medicaid Services requirements, as outlined in the most current version of CMS's *Medicare Marketing Guidelines*
- Meet all applicable BCBSM and BCN requirements described in this policy
- Submit websites to BCBSM or BCN annually for review through test links or screen shots prior to making the site accessible to the public
- Make any changes required by BCBSM, BCN or CMS
- Reflect correct and current CMS approval status as provided by BCBSM or BCN

Agents and/or agencies that do not follow the Medicare Advantage website policy will be considered out of compliance with CMS regulations and subject to disciplinary action, up to and including termination of their producing agent agreement and/or managing/general agent agreement.

### Practices and procedures

- **Content requirements**

To ensure compliance with CMS guidelines, BCBSM and BCN authorize agents and/or agencies to use one of the following methods to reference Blues products on their websites:

1. **Include detailed product information on the agent and/or agency website.** Agents and/or agencies may include information such as product names, benefits, and copayment and deductible amounts, provided the following conditions are met:

- Text on the website must be at least Times New Roman 12 point or equivalent. Website text may be larger, but it must meet this minimum requirement.
- The website must include a material ID code provided by BCBSM or BCN at the bottom of each page with BCBSM or BCN Medicare Advantage content on it. This ID code is for CMS to validate that the site was reviewed and approved for use. Until the site is approved by CMS, BCBSM or BCN will provide the agent with a temporary ID code that indicates that CMS approval is pending. For more information, see approval process below.
- The website must include the appropriate disclaimers, as follows:

If Medicare Plus Blue<sup>SM</sup> PPO is mentioned:

- *Medicare Plus Blue<sup>SM</sup> is a PPO plan with a Medicare contract. Enrollment in Medicare Plus Blue depends on contract renewal.*
- *This is not a complete listing of plans available in your service area. For a complete listing, please contact 1-800-MEDICARE (TTY users should call 1-877-486-2048), 24 hours a day, seven days a week or consult [www.medicare.gov](http://www.medicare.gov).*

If benefits, premiums, deductibles, copayment or coinsurance amounts are included in website text:

- *The benefit information provided is a brief summary, not a complete description of benefits. For more information contact the plan.*
- *Limitations, copayments, and restrictions may apply.*
- *Benefits, formulary, pharmacy network, premium and/or copayments/coinsurance may change on January 1 of each year.*
- *You must continue to pay your Medicare Part B premium.*

If Prescription Blue<sup>SM</sup> PDP is mentioned:

- *Prescription Blue<sup>SM</sup> is a PDP plan with a Medicare contract. Enrollment in Prescription Blue depends on contract renewal.*
- *This is not a complete listing of plans available in your service area. For a complete listing, please contact 1-800-MEDICARE (TTY users should call 1-877-486-2048), 24 hours a day, seven days a week or consult [www.medicare.gov](http://www.medicare.gov).*

If benefits, premiums, deductibles, copayment or coinsurance amounts are included in website text:

- *The benefit information provided is a brief summary, not a complete description of benefits. For more information contact the plan.*
- *Limitations, copayments, and restrictions may apply.*
- *Benefits, formulary, pharmacy network, premium and/or copayments/coinsurance may change on January 1 of each year.*
- *You must continue to pay your Medicare Part B premium.*

If BCN Advantage<sup>SM</sup> HMO-POS or BCN Advantage<sup>SM</sup> HMO are mentioned:

- Contracting statement, as appropriate for plans mentioned:
  - *BCN Advantage<sup>SM</sup> is an HMO-POS plan with a Medicare contract. Enrollment in BCN Advantage depends on contract renewal.*
  - *BCN Advantage<sup>SM</sup> is an HMO plan with a Medicare contract. Enrollment in BCN Advantage depends on contract renewal.*
  - *BCN Advantage<sup>SM</sup> is an HMO-POS and HMO plan with a Medicare contract. Enrollment in BCN Advantage depends on contract renewal.*
- *This is not a complete listing of plans available in your service area. For a complete listing, please contact 1-800-MEDICARE (TTY users should call 1-877-486-2048), 24 hours a day, seven days a week or consult [www.medicare.gov](http://www.medicare.gov).*

If benefits, premiums, deductibles, copayment or coinsurance amounts are included in website text:

- *The benefit information provided is a brief summary, not a complete description of benefits. For more information, contact the plan.*
- *Limitations, copayments, and restrictions may apply.*
- *Benefits, formulary, pharmacy network, premium and/or copayments/coinsurance may change on January 1 of each year.*
- *You must continue to pay your Medicare Part B premium.*

2. **Link to product-specific Web pages created and maintained by BCBSM or BCN.** BCBSM and BCN have developed CMS-approved Web pages that contain current product information. These pages are not accessible to the general public through **bcbsm.com**. Instead, each product-specific page has a unique URL and is only available through links from agent and/or agencies websites. Agents and/or agencies may link to the product-specific pages available at the following URLs:

- Medicare Plus Blue<sup>SM</sup> PPO: <http://bcbsm.com/agentom/agentlink1.shtml>
- Prescription Blue<sup>SM</sup> PDP: <http://bcbsm.com/agentom/agentlink2.shtml>
- BCN Advantage<sup>SM</sup> HMO-POS: <http://bcbsm.com/agentom/agentlink3.shtml>

Agent and/or agency sites that include links to these product-specific pages must also meet these requirements:

- Text on the website must be at least Times New Roman 12 point or equivalent. Website text may be larger, but it must meet this minimum requirement.
- The website must include the material ID code provided by BCBSM or BCN at the bottom of each page with BCBSM or BCN Medicare Advantage content on it. This ID code is for CMS to validate that the site was reviewed and approved for use. Until the site is approved by CMS, BCBSM or BCN will provide the agent with a temporary ID code that indicates that CMS approval is pending. For more information, see approval process below.

- **Approval process**

All agent and/or agency websites should be submitted to BCBSM or BCN annually, by September 30 of each year, following this process:

Step 1: Once an agent's website has been developed, the agent should submit the site to his or her managing or general agent prior to making it available for public viewing. Agent websites must be submitted by test links or screen shots in a Word document.

Step 2: The managing or general agent should send the test links or screen shots to BCBSM or BCN at agentwebsites@bcbsm.com for review. Managing or general agent websites should follow Steps 1 and 2 as well.

Step 3: BCBSM or BCN will review the site and advise the agent and/or agency directly of updates that must be made. If no updates are required, skip to Step 5.

Step 4: If updates are required, the agent and/or agency must make the necessary changes and resubmit the site to BCBSM or BCN for approval.

Step 5: BCBSM or BCN will advise the agent and/or agency if their site is approved. Once approved, BCBSM or BCN will issue a temporary material ID code, which will indicate that CMS approval is pending. The agent and/or agency should add the temporary code to the bottom of each webpage with BCBSM or BCN Medicare Advantage content on it. If the site is not approved by BCBSM or BCN, the agent and/or agency should repeat the approval process from Step 4 above.

Step 6: BCBSM or BCN will submit the agent's and/or agency's website to CMS. All websites require 45-day CMS review. Once BCBSM or BCN confirms that the agent's and/or agency's website has been submitted to CMS, the agent and/or agency is permitted to promote the website to a production server, where it will be viewable by the public. The agent's and/or agency's website must contain the temporary approval code assigned by BCBSM or BCN when the site is made available to the public. Failure to comply with this requirement is a violation of CMS guidance and this policy.

Step 7: When BCBSM or BCN receives notification that CMS has approved an agent's and/or agency's website, BCBSM or BCN will notify the agent and/or agency and provide a final material ID code, which should replace the temporary code on the agent's and/or agency's live website immediately. If CMS does not approve an agent's or agency's website, the website must be removed immediately from public viewing and the agent or agency should repeat the approval process from Step 4 above until the site receives CMS approval.

## **Electronic enrollments**

- Enrollment through agent or broker website is not permitted.
- Managing agents and general agents may make electronic enrollment available to potential enrollees through BCBM and BCN's electronic enrollment system. Contact your Blues sales representative for additional requirements and approval.

## **Responsibility**

### Agents

- Meet all BCBSM and BCN content requirements outlined in this policy.
- Comply with all CMS regulations.
- Submit website to managing or general agent each year by September 30 of each year.
- Follow approval process outlined in this policy.
- Ensure that website always contains the latest CMS material ID and status or approval date provided by BCBSM or BCN.

### General or managing agents

- Comply with all CMS regulations.
- Submit agent and agency websites to BCBSM or BCN for review.

### BCBSM and BCN

- Comply with all CMS regulations.
- Review agent and/or agency website submissions for compliance with BCBSM and BCN policies and CMS regulations within 10 business days of receipt.
- Advise agents and/or agencies of any website changes necessary to ensure compliance.
- Provide temporary and permanent CMS material ID codes for all agent or agency website submissions.
- Submit agent and/or agency websites to CMS.
- Monitor agent and/or agency compliance with this policy.
- Enforce disciplinary or corrective measures for noncompliance, up to and including termination of the agent's producing agent agreement or managing/general agent agreement.