

COMPLIANCE DEPARTMENT COMPLIANCE ALERT

Date: January 24, 2019

To: Amerilife

Subject: FMO Website Requirements – Medicare Communications and Marketing Guidelines

On September 5, 2018, CMS issued the CY2019 Medicare Communications and Marketing Guidelines, MCMG for short. These guidelines interpret and provide guidance on the marketing and communication rules for Medicare Advantage plans and employer/union-sponsored Group MA or Part D plans. Plans/Part D sponsors are responsible for ensuring compliance with CMS' current communication and marketing regulations and guidance. This includes monitoring and overseeing the activities of their subcontractors, downstream entities, and/or delegated entities, including FMOs.

Section 70.1.1 of the MCMG provide general website requirements. Therefore, to insure compliance with these requirements any agent that maintains a website with MCS Classicare information, including marketing content, must submit such website for our review and approval prior to making the content public. Also, any marketing material needs to be submitted to MCS for review and CMS' approval prior to distribution.

Enclosed are the CMS general website requirements for reference.

References:

CY 2019 Medicare Communication and Marketing Guidelines, rev. 9.05.2018