

Humana MarketPoint®

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Purpose

The purpose of this policy is to outline the guidelines for external agents who have completed the necessary requirements (outlined below) to use Permitted Social Media Channels as a way to communicate or market to prospective and current members or promote themselves for the purpose of generating leads for Humana/CarePlus Medicare Advantage and/or Prescription Drug Plan sales. Any Communication or Marketing material must comply with the Centers for Medicare and Medicaid Services (CMS) Medicare Communication and Marketing Guidelines (MCMG) and all other applicable federal and state laws, rules, regulations and guidelines.

According to Section 30 of the MCMG:

“Note: Text messaging and other forms of electronic direct messaging (e.g., social media platforms) would fall under unsolicited contact and is not permitted.”

“Reuse of individual users’ content or comment from social media sites (e.g., Facebook, Twitter) that promotes a Plan’s/Part D sponsor’s product is considered a product endorsement/testimonial and must adhere to the guidance in this section.”

According to Section 70 of the MCMG:

“Plans/Part D sponsors must submit social media posts (e.g., Facebook, Twitter, YouTube) that meet the definition of marketing into HPMS, using code 4038.”

Definitions

Social Media – Any electronic tool that is based on user participation, user-generated content and conversation between users. Agents may use the social media channels listed below. Use of any other social media channel is strictly prohibited.

Permitted Social Media Channels:

- Facebook

Communications – As defined in the MCMG, activities and use of materials by the Plan/Part D Sponsor to provide information to current and prospective enrollees.

Marketing – As defined in the MCMG, a subset of communications which includes activities and use of materials by the Plan/Part D sponsor with the intent to draw a beneficiary’s attention to a plan or plans and to influence a beneficiary’s decision-making process when selecting a plan for enrollment or deciding to stay enrolled in a plan (retention-based marketing). Additionally, marketing contains information about the plan’s benefit structure, cost sharing, measuring or ranking standards.

Facebook Event – A Facebook Event is a calendar-based resource on the Facebook platform that can be used to notify users of upcoming occasions.

Policy

Agents who have completed the required training may post pre-approved content on Permitted Social Media Channels using the Social Media platform located in the Marketing Resource Center (MRC) as long as they meet the Agent Requirements and follow the Social Media Guidelines below.

Agent Requirements

Agents must meet the following requirements:

1. Be a licensed, appointed, and certified agent for Humana.
2. Complete the required online training for Social Media marketing.

Social Media Guidelines

Agents who meet the requirements above must adhere to the following Social Media Guidelines and may only use the MRC when communicating through Permitted Social Media Channels. The MRC houses a library of approved content.

In addition, the MCMG must be followed. Any violation of this policy will result in disciplinary action, up to and including termination of an agent’s contract or appointment. The Social Media Guidelines include, but are not limited to:

Agents may:

- Post only pre-approved content on a Permitted Social Media Channel through the MRC.
- Provide their contact information in the informational section of the Permitted Social Media Channel or in response to a request for more information from a consumer.
- Invite friends from their personal page to “Like” their business page; however, only one unsolicited invitation attempt should be made.
- Set up a Facebook Event and may only invite those who have “Liked” their page to attend. It should be clear on the invitation how the person can opt out of receiving any future messages from the agent, i.e. by “UnLiking” the agent’s business page.

- Share Facebook Events that other groups or individuals are hosting on the agent's own business page, as long as the Facebook Events meet the marketing/educational event requirements from the MCMG.
- Reply to a consumer's post, comment, or private message that asks general educational questions where the response would fall under the definition of a *Communication* and not include any type of *Marketing*, as defined in the MCMG. The request must be initiated by the consumer and agents must respond using the same method that the consumer used to reach out to the agent (for example, responding to a consumer's private message with a private message). Agents may not respond to questions beyond what was asked. This includes responses to posts, comments, or private messages. Responses must be factual in nature and done in such a manner as to not imply any steering or marketing.
- Encourage enrollees to "Like" their business page during the sales appointment.
- Give their Facebook url to prospects and members in accordance with MCMG unsolicited contact guidelines. Important reminder that you may not modify pre-approved marketing materials.
- Re-post non-Humana branded content and articles from reputable sources (i.e. Medicare.gov, SSA.gov, CMS.gov, etc.) that allow their information to be re-posted. Information posted should be factual, not misleading or disparaging, and must not imply that the agent is affiliated with the referenced source.

Agents must:

- Register their Facebook account as a business account and it must be associated with the agent's identity.
- Use good judgement when displaying a Social Media persona.
- Be courteous and respectful when interacting with anyone on Social Media.
- Not express personal opinions of any nature as they are representing the Humana brand.
- Always act responsibly and respectfully when posting any content on Social Media. This includes not posting disparaging, threatening, harassing, discriminatory or other inappropriate content. Never imply or state that anything posted by the agent is the opinion of Humana.
- Any reference to a marketing/sales event on a Social Media platform must be accompanied by the two following disclaimers:
 - "A sales person will be present with information and applications."
 - "For accommodation of persons with special needs at sales meetings call <insert phone and TTY number>"

Please Note: Should a consumer ask specific plan benefit questions, make negative or derogatory comments, need customer service assistance, or include personal health information on Social Media, agents should follow the guidance provided in the Social Media Job Aid found on Humana MarketPoint University on how to address those situations.

Agents may NOT:

- Create their own content that falls under the definition of Communication or Marketing to post on any Social Media platform. This includes, but is not limited to, posting any information about plan benefits, premiums, or star ratings.
- Post or add comments or responses that include any type of *Marketing*.
- Alter the pre-approved post (other than the approved customizable fields), such as by adding content to the feed, or in the comments section.
- Use Social Media platforms' interactive functionality (e.g. Facebook Messenger, Chat) as a means to initiate communication directly with consumers and/or members.
- Engage in conversations on Social Media that involve any discussion or disclosure of personal health information or share protected and confidential information, including, but not limited to: personally identifiable information, credit card information, social security numbers, or health information.
- Engage in conversations on Social Media with the press or in relation to any media inquiry. This could include, but is not limited to, requests from a media outlet, someone tagging a media outlet, someone asking the agent to be a spokesperson or give a statement related to a media inquiry. Any such inquiries must be referred to Humana's Corporate Communications department.
- Engage in any Humana customer care/customer service related dialogue on any Social Media sites, except as permitted in the Job Aid referred to below in the Related Links section.
- Post photos of prospects or members.
- Push Medicare related content to another group's Facebook page by tagging them or posting directly on their page.
- Engage in unsolicited contact. If an individual comments, likes or follows an agent on Social Media, this does not give the agent permission to contact the individual. However, agent can reply to general educational questions, as outlined above.
- Post any content to target or tag an individual using Social Media tools.
- Communicate with any government related entity.
- Use paid ads through any Social Media channel. For example, agents may not use Facebook Ads Manager or Business Manager function to create a Facebook ad campaign.
- Use sweepstakes or giveaways with the stipulation that someone must "Like" their page or encourage followers as a means to participate.

Non-Compliance

Failure to comply with any part of Humana's/CarePlus policy, standards, guidelines and procedures may result in disciplinary action up to and including termination of contract with Humana/CarePlus. In addition, state and/or federal agencies may take action in accordance with applicable laws, rules and regulations.