Marketing and Communication Annual Training

Standards, Best Practices, and Compliance Expectations

2026-2027

INNOVATIVE FINANCIAL GROUP

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Disclaimer

This training material is confidential and intended solely for agent training purposes. It, including any of its components, must not be used for marketing or shared with prospects, applicants, members, groups, or the general public.

The content herein provides a general overview of agent conduct and compliance obligations. It does not encompass all applicable laws, regulations, rules, company policies, or other requirements. Updates or changes may be issued by CMS. Agents remain responsible for adhering to all relevant laws and regulations.

Agenda

- Marketing & Communication Guide
- Marketing vs. Communication
- Non-Compliant Marketing
- Best Practices & Compliance Requirements
- Submission Process
- General Marketing Guidance
- Non-MA Product Submissions
- Marketing Resources

Marketing & Communication Guide

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M&C Guide Key Takeaways

- **What This Guide Is**
  - The IFG Marketing & Communication Guide provides clear expectations for how agents, agencies, and vendors must create, submit, and use Medicare marketing and communication materials.
  - It serves as your **compliance roadmap**, helping ensure materials meet all CMS, carrier, and IFG requirements before use.
  - This guide is available on the IFG Agent Tools website for easy reference.

- **Why It Matters to You**
  - Helps protect your agency from **compliance findings, delays, and carrier escalations**.
  - Ensures your materials are **approved before use**, reducing risk and rework.
  - Clarifies what you can and cannot do when advertising to Medicare beneficiaries.

- **Your Responsibilities**
  - Only use materials that have been **submitted to and approved by IFG Marketing Oversight.**
  - Include all **required CMS disclaimers**
  - Follow all CMS, carrier, FTC, FCC, and HIPAA rules

Marketing vs. Communication

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Marketing vs. Communication

Key Takeaway: **Marketing** means activities that meet both *intent* and *content* standards. **Communication** means activities that meet intent standards

- **Intent:**
- Grabs attention
- Helps consumers make choices
- Keeps them engaged

- **Content:**
- Plan Benefits
- Costs
- Ratings and standards
- Rewards and incentives

Marketing vs. Communication Example

The ads shown are for illustrative training purposes only and should not be interpreted as meeting all CMS or carrier compliance standards.

Knowledge Check!

Which two elements must be present for a material to be considered Marketing?

A. Branding and formatting
B. Intent and content
C. Consumer consent and disclaimers

Correct Answer: B

Non-Compliant Marketing Examples

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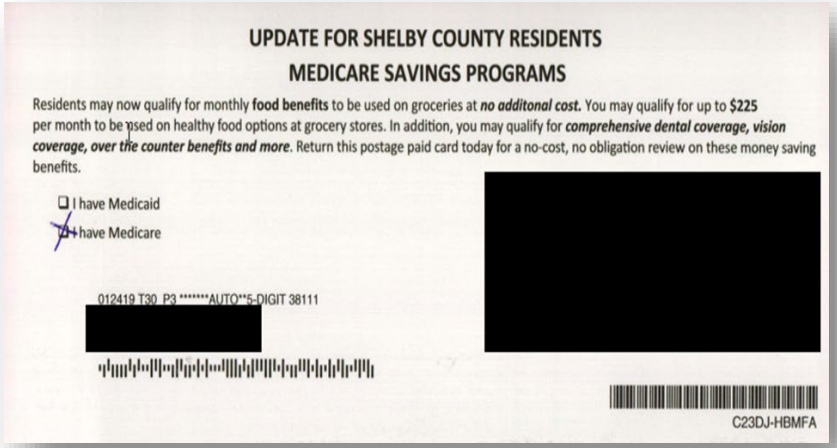
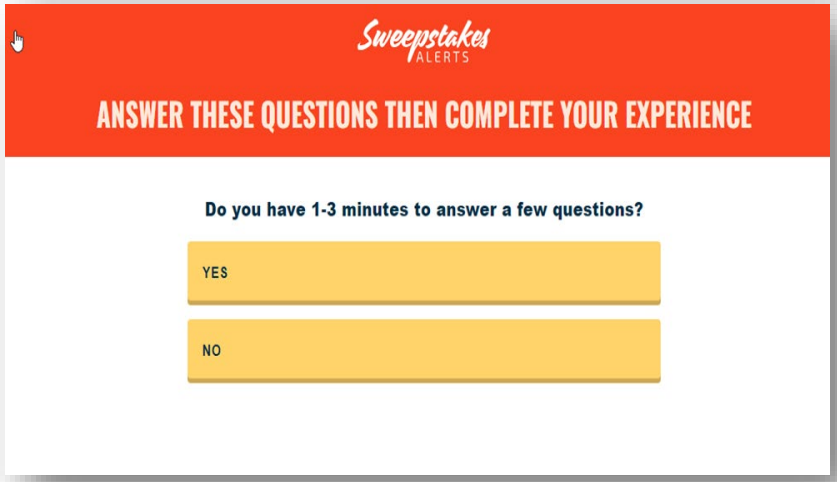
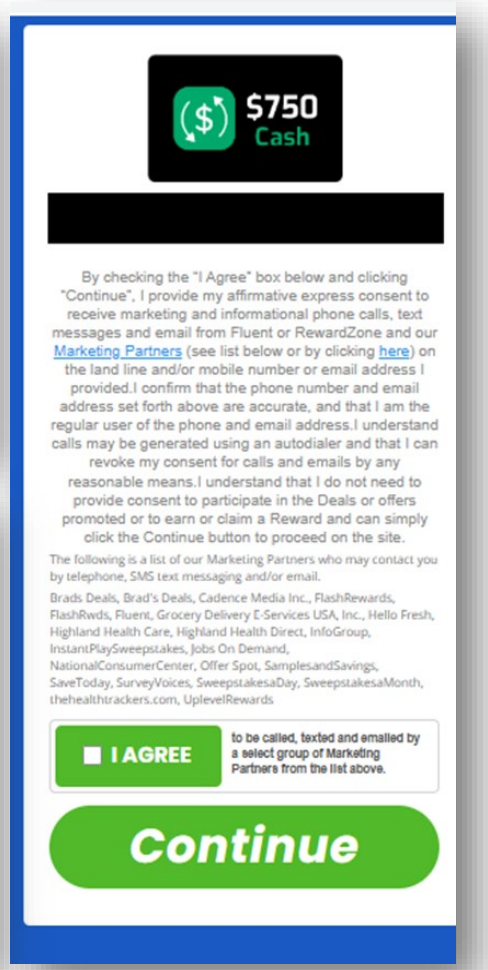
Non-Compliant Marketing Examples

These are examples of advertising that does not meet CMS, carrier, or IFG standards

- Government-style formatting
- Sweepstakes or incentive-based prompts
- Pressure-based calls-to-action
- Unclear or buried consent language
- Misleading benefit language







Knowledge Check!

Which of these is a red flag that must not be used in marketing content?

A. Clear call-to-action
B. Accurate plan benefit explanation
C. "Claim your free $1,200 grocery card today!"
D. Proper licensing statement

Correct Answer: C

Submission Best Practices & Compliance Requirements

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Requirements Prior to IFG Submission

- **Valid Contracting Status:** The submitting agency must be contracted under IFG. (IFG SI validates contracting before review begins.)
- **Completed IFG Material Submission Form:** Fully filled out with accurate agency and material details.
- **Material File in Required Format:** Submit the material as a **Word document with all text editable** (no PDFs, images, or locked content).
- **Finalized Content (No Drafts):** Only submit materials that are complete and ready for formal review.

Best Practices: Before you Submit

As outlined in the IFG Marketing & Communication Guide, confirm the material:

- Includes a **SMID** for each material
- Contains all **required CMS disclaimers**, which are accurate and visible
- Includes **SEP/IEP language** if needed outside of AEP
- Clearly shows it's from an **insurance agency**
- Clearly states it's about **Medicare Advantage**
- Is on a **WORD document** with all editable text
- Includes guidance to understand the **full consumer experience**
  Example shown on next slide
- Includes **HPMS opt-ins** for vendor-created marketing materials

Consumer Experience Flow Example

Example 1: Permission to Contact (PTC) Outbound Campaign Flow

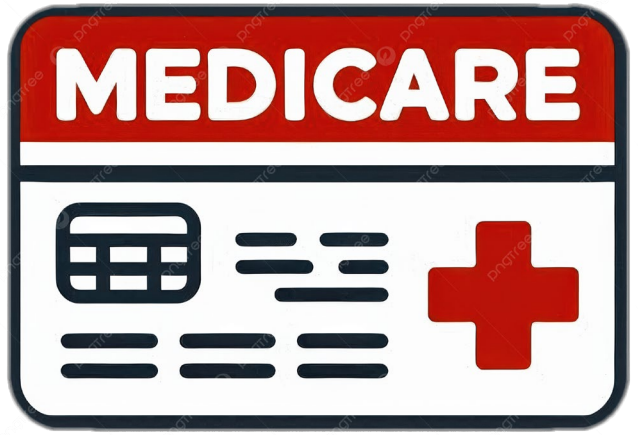
Example 2: Click to Call Inbound Campaign Flow

**Fronter: A non-licensed individual who assists with administrative intake and call routing only. Fronters do not discuss plan benefits, premiums, carriers, or make eligibility or enrollment determinations.*
Please note that not all IFG downline agencies utilize fronters to assist with call routing prior to connecting consumers with a licensed sales agent. The flows shown are provided for illustrative purposes only and reflect scenarios commonly reviewed by Marketing Oversight.

Compliance Considerations: Before you Submit

Confirm the material:

- Avoids language or images that create fear, urgency, or stress
- Avoids looking like government materials (flags, red/white/blue)
- Avoids confusing or misleading language
- Avoids “savings unrealized” language
- Avoids superlative and absolute language, e.g. “This is the best plan!”
- Avoids use of the term Senior
- Avoids use of Sweepstakes, job applications, samples, etc.
- Avoids disparaging Medicare, e.g. “Medicare is difficult to understand.”



Website Requirements

- **Annual Resubmission:** Agency websites must be submitted annually for review and possible HPMS filing.
- **Permission to Contact Requirements:** Additional information (like age or gender) is optional and must be labeled as optional.
- **Content Separation:** Keep Medicare Advantage content separate from other products, such as Medicare Supplement plans.
- **Call to Action:** The “Call to action” must clearly show what happens next—no surprises.
- e.g. The consumer will be contacted by a licensed sales agent.
- **Contact Information:** Include a TTY number and your days/hours of operation.
- **General Rules:** Easy and clear to navigate and contain the URL and the SMID on the submission form.

Knowledge Check!

Which of the following is not allowed in marketing materials?

A. Clear explanation of services
B. Red/white/blue government-style imagery
C. Required disclaimers
D. Agency branding

Correct Answer: B

Submission Process

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Submission Form

- **Purpose of the Submission Form**
  The IFG Submission Form is the required intake tool used to initiate the review process for all marketing and communication materials. It collects the information IFG Marketing Oversight needs to evaluate the material and route it through the necessary channels for approval.

The submission form can be found at: **https://www.teamifg.com/marketingcompliance**

- **Importance**
  - Ensures complete and accurate information accompanies each submission
  - Supports efficient routing to carriers
  - Enables accurate tracking for Marketing Oversight
  - Reduces delays caused by missing details or incomplete documentation

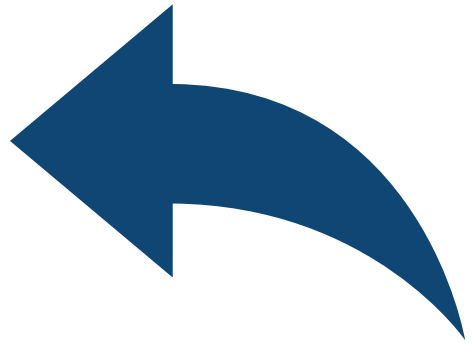
- **Reminders Before You Submit**
  - Ensure all required fields are complete
  - Attach editable documents (not PDFs or images)
  - Provide vendor details
  - Verify selling period and intended use

What to Expect After Submission

- **Review Timeline**
  - IFG Marketing Oversight will review your submission within 7 business days.

  Note: May–November volumes may extend response times.

- **Status Updates**
  - You will receive an email update from Marketing Oversight confirming:
    - The status of your submission, and
    - Whether revisions are needed before carrier review.
    - If requested revisions are not received **within 30 days, the submission will be cancelled.**



- **Approval is Not Guaranteed**
  - Submission does not guarantee approval or carrier acceptance.

- **Estimated Turnaround Time**
  - Current full approval timeline: ~30-60 days.

- ***Important:*** *If your agency makes any changes to your marketing materials or associated vendors including updating a material, discontinuing its intended use, or ending a relationship with a vendor, please ensure these status changes are communicated to Marketing Oversight.*

Lead Source Vendor Material Review Requirements

- **HPMS Opt-In Expectations**
  - Include HPMS carrier opt-ins with your submission in a zip file. Clear mapping of which opt-ins correspond to which files is required.
  - Opt-ins only support carrier processing; they **do not grant broad approval** to use the material.

- **1:1 Material Match**
  - The SMID must be the **original SMID** the carrier opted into
  - No edits or modifications to the material are permitted unless the vendor obtains new opt-ins
  - The HPMS filing dates **must match** the dates originally selected by the filer.

- **Lead Source Vendor Vetting Prior to Engagement**
  - Agencies are responsible for conducting due diligence on any vendor prior to initiating work, ensuring the vendor meets all internal and regulatory requirements.

- **Required Lead Source Vendor Documentation**
  - Vendors must complete the Vendor Assessment form **prior to IFG processing**. Submissions will be **cancelled after 30 days** if no response is received.

After Approval: What you Need to Know

- **Approval Scope**
  All approvals are provided explicitly in writing by Marketing Oversight. Approvals apply **only to your agency** and **any authorized downline entities** within your organizational hierarchy and are valid **only for the selling period submitted**. Materials must be resubmitted annually for review and approval.

- **No Redistribution**
  Materials may not be shared, distributed, or used outside your approved hierarchy. This includes other agencies, uplines, downlines, or external partners without explicit authorization.

- **Ongoing Compliance**
  Approvals may be **revised, suspended, or revoked** if findings indicate non-compliance by the agency or any associated vendor.

Knowledge Check!

What is the current estimated timeline for complete marketing review and approval?

A. 5 days
B. 30 days
C. 60 days
D. 6 months

Correct Answer: C

General Marketing Guidance

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TPMO Beneficiary Data Sharing -- 1:1 Rule

Third-Party Marketing Organizations (TPMOs) must receive prior express written consent before sharing beneficiary data with another TPMO.

- Separate consent is required for each TPMO.
- Beneficiaries must be able to pick which TPMOs can access their data (e.g., with a checkbox).

Source: CMS-4205-F (89 FR 30448) — TPMO Distribution of Personal Beneficiary Data.

Additional Tips for Marketing Practices

- Keep one clear message; avoid bait-and-switch tactics.
- Use clear, accurate language; do not promise free items or misrepresent benefits.
- List amounts carefully; do not bundle or combine categories (e.g., groceries and savings).
- Use Medicare Card images only with prior CMS approval.
- Rest of Year (ROY)/Special Enrollment Period (SEP): Clearly state that enrollment is only allowed if eligible under SEP, with required qualifiers.

MA-OEP Guidance

- During Medicare Advantage Open Enrollment Period (MA-OEP) you may focus on other Special Enrollment Period opportunities such as New to Medicare, 5-star plans, recently moved etc.
- Do not send unsolicited materials advertising the opportunity to make an enrollment change.
- Do not specifically target consumers in the MA-OEP

Non-Medicare Advantage Materials

- **Materials That Must Be Submitted**
  - Medicare Supplement (Medigap) materials
  - Hospital Indemnity materials
  - Dental / Vision / Hearing materials
  - Life insurance and Final Expense marketing pieces
  - Ancillary products (Cancer, Heart, Stroke, Critical Illness, etc.)
  - Lead generation materials tied to non-MA products
  - Websites, landing pages, or funnels referencing any non-MA product
  - Recruiting or agency-growth communications that reference insurance products or carriers

- **Submission Expectations**
  - Materials must follow the **IFG Marketing & Communication Guide** requirements
  - All materials must include **accurate and required product-specific disclosures**
  - Provide editable **Word documents**
  - Ensure the content is **accurate, factual, and compliant** with carrier and state rules

Marketing Resources

IFG Marketing and Communication Guidelines

- This document provides additional guidance on IFG Compliant Marketing practices and should be used as a resource document. IFG Marketing and Communication Guide

IFG Approved Sales Script

- Use the approved sales script for all telephonic enrollments. Sales Script

Scope of Appointment (SOA)

- Complete an SOA for every appointment, whether in person or over the phone.

IFG Generic Materials

- Generic Materials approved for IFG Downline use Personalized marketing materials

References

The standards, requirements, and definitions referenced throughout this training are based on the following CMS regulations and guidance. These requirements must be followed when creating, using, or distributing Medicare-related marketing and communication materials.

- **42 CFR §422.2260 – Definitions**
  Referenced on slides 7-9: Marketing vs. Communication
- **42 CFR §422.2261 – Submission, Review, and Distribution of Materials**
  Referenced on slides 14–16, 20–22: Submission Process and Review Expectations
- **42 CFR §422.2262 – General Communications Materials and Activities Requirements**
  Referenced on slides 7–8, 15, 17: Communications vs. Marketing and Compliance Considerations
- **42 CFR §422.2263 – General Marketing Requirements**
  Referenced on slides 11–12, 15, 17: Non-Compliant Marketing and Best Practices
- **42 CFR §422.2265 – Website Requirements**
  Referenced on slide 18: Website Requirements
- **CMS Medicare Communications and Marketing Guidelines (MCMG)**
  Referenced throughout slides 5–31
- **CMS Memorandum (May 10, 2023) – Marketing Material Clarifications**
  Referenced on slides 7, 15: Benefit References and Marketing Classification

Thank You for Your Participation!

Questions?

IFG Marketing Oversight is here to help.

Please reach out any time at IFGMarketingOversight@teamifg.com