

In addition to reporting new sales events, CMS also requires notification be given for an event that is revised or canceled (see specific CMS guidance for cancellations below) prior to the scheduled event. Coventry has an obligation to notify CMS of all cancellations/revisions at least 48 hours prior to a scheduled event; therefore, agents/plans have an obligation to notify Coventry immediately upon receipt of such information.

Submit revised or cancellation information to Agent Oversight the same way you report your events, which is through any of the following methods:

- Directly with the Coordinated Health Care Plan who will inform Agent Oversight on your behalf
- Telephone: 1-866-714-9301
- Fax: 724-741-4344 or 724-741-7285
- Email: MedicareSemi@cvty.com

CMS Specific Guidelines for Event Cancellations

Agent/plan sponsors must notify beneficiaries of cancelled events consistent with the following CMS rules:

1. If a **seminar is cancelled within 48 hours** of its originally scheduled date/time, the agent/plan must:
 - Have a representative at the site at the time the event was scheduled to inform attendees of the cancellation and to distribute plan information.
 - Representative must remain for at least 15 minutes after the scheduled start time.
 - Before leaving, representative must include signage stating that the event was cancelled and, if appropriate, notice can include alternate event opportunities.
2. If an **event is cancelled more than 48 hours** prior to originally scheduled date/time, the agent/plan should:
 - Notify beneficiaries of cancelled event using same means the agent/plan used to advertise the event.
 - § If seminar was announced via newspaper ad, cancellation should be announced in the same newspaper.
 - § If cancellation cannot be updated in newspaper, agents/plans must provide an alternative method of notifying beneficiaries (e.g., leave a post signage at the event of cancellation).
 - § If beneficiaries were identified through personal calls, then the agent/plan representative should call the beneficiaries to inform them of the cancellation.
 - § If beneficiaries replied via RSVP for the event, the agent/plan representative should call the beneficiaries to inform them of the cancellation.
 - § If the event was announced during a mass mailing, the agent/plan should consult with their Account Manager to determine a reasonable way to notify beneficiaries of the cancellation rather than sending another mass mailing.
 - Agent/plan sponsors should save documentation related to the above cancellation types and be prepared to provide a copy of it to CMS upon request.
 - Agent/plan is not required to have a representative at the site of the event.
 - Agents/plans should attest the event was cancelled and that beneficiaries were notified.
 - Notification documentation (attestation) should include a list of beneficiary names and phone numbers and the date and time beneficiaries were notified.
 - The agent/plan is expected to keep the attestation on file and make it available upon CMS request.
 - **Agent/plan must also submit the attestation to Agent Oversight via the same method used when reporting monthly marketing/sales seminars.**
3. In all cases, Coventry must be notified of any cancellations.

4. No commission will be paid to an agent for a sale that was a result of a sales event that was not reported. Failure to report these events may result in termination of your contract.

CLARIFICATION:

Marketing/Sales Events are events sponsored by an agent/plan or another entity with the purpose of marketing to potential members and steering, or attempting to steer, potential members towards a specific or limited number of plans.

- o These events MUST be reported to Coventry by the 27th of each month for events scheduled for the following month. Coventry reports all such events to CMS.
- o Meals may not be provided to attendees at a marketing/sales event.
- o Applications may be distributed and collected.

Educational Events may inform a potential enrollee about MA or other Medicare programs, but may not steer, or attempt to steer, a potential enrollee towards a specific plan or limited number of plans.

- o These events may NOT include any sales activities such as the distribution of marketing materials or the distribution/collection of plan applications.
- o These events do NOT get reported as marketing/sales events to CMS.

Health Fairs, Health Promotional Events, and Senior Expo Fairs if billed as an educational event then the agent/plan sponsor must abide by the rules for an educational event.

- o May respond to questions asked at the event. Response to questions asked at the event will not be considered a sales presentation as long as NO enrollment form is accepted at the event.
- o May have pre-enrollment materials available, including enrollment forms, but enrollment forms may NOT be accepted.
- o Collection of enrollment forms is NOT permitted.

If you have any questions, please direct them to Agent Oversight at 866-714-9301.

***Coventry Health Care
Agent Oversight Department***