

**All** agent/agency created materials, **MUST** be submitted to the Gordon Marketing Compliance Department for review PRIOR to use: **[compliance@gordonmarketing.com](mailto:compliance@gordonmarketing.com)**

**BEFORE SUBMITTING MATERIAL, EACH AREA BELOW MUST BE ADDRESSED:**

This is not an all-inclusive list. Please be sure to send all materials to **[compliance@gordonmarketing.com](mailto:compliance@gordonmarketing.com)** for final review and approval. Turn-around times are listed below for each material type, so please plan accordingly.

<b>IF AGENCY</b> , IS ADVERTISED AGENCY NAME REGISTERED WITH THE STATE DOI?	<input type="checkbox"/> YES <input type="checkbox"/> NO
IS MATERIAL A NEW OR REVISED PIECE?	<input type="checkbox"/> NEW <input type="checkbox"/> REVISED
<b>IF REVISED</b> , MATERIAL IS INCLUDED WITH ORIGINAL THREAD ALONG WITH COMPLIANCE COMMENTS & EDITS	<input type="checkbox"/> YES <input type="checkbox"/> NO
IS THIS MARKETING OR COMMUNICATIONS?*	<input type="checkbox"/> MARKETING <input type="checkbox"/> COMMUNICATIONS
<b>IF MARKETING</b> , HAS THE MATERIAL BEEN SUBMITTED FOR CMS & CARRIER APPROVAL?	<input type="checkbox"/> YES <input type="checkbox"/> NO
IS MATERIAL CONSUMER OR AGENT FACING?	<input type="checkbox"/> CONSUMER <input type="checkbox"/> AGENT
<b>IF CONSUMER FACING</b> , IS THE "NOT AFFILIATED WITH THE U.S. GOVERNMENT OR FEDERAL MEDICARE PROGRAM" DISCLAIMER PRESENT WHEN MENTIONING ANYTHING MEDICARE RELATED?	<input type="checkbox"/> YES <input type="checkbox"/> NO
DOES THE MATERIAL CLEARLY IDENTIFY THE AGENT, ADDRESS, PHONE NUMBER OR ANY OTHER IDENTIFIER REQUIRED?	<input type="checkbox"/> YES <input type="checkbox"/> NO

IS THE TERM “SENIOR” BEING USED APPROPRIATELY?**	<input type="checkbox"/> YES <input type="checkbox"/> NO
IS THE TERM “FREE” BEING USED APPROPRIATELY?**	<input type="checkbox"/> YES <input type="checkbox"/> NO
DOES THE MATERIAL INCLUDE STATISTICS, DATA, PREDICTIONS OR OTHER INFORMATION TAKEN FROM A SECONDARY SOURCE?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>IF YES</b> , ARE ALL SOURCES CITED AND UP-TO-DATE?	<input type="checkbox"/> YES <input type="checkbox"/> NO
IF AGENT/AGENCY CREATED WEBSITE IS PRESENT ON MATERIAL, HAS THE WEBSITE BEEN REVIEWED & APPROVED BY COMPLIANCE?	<input type="checkbox"/> YES <input type="checkbox"/> NO
ARE APPROPRIATE AGENT TITLES BEING USED?****	<input type="checkbox"/> YES <input type="checkbox"/> NO
ARE SPECIFIC CARRIER LOGOS/NAMES PRESENT?	<input type="checkbox"/> YES <input type="checkbox"/> NO
IF YES, HAVE YOU OBTAINED PERMISSION FROM THE CARRIER?	<input type="checkbox"/> YES <input type="checkbox"/> NO
IF BRC, EBRC, OR CONTACT FORMS (PRINT OR ELECTRONIC) DOES THE MATERIAL COMPLY WITH HIPAA LAW?*****	<input type="checkbox"/> YES <input type="checkbox"/> NO

**\*Marketing Vs. Communications - (Please refer to the 2022 MCMG for full explanation):**

If the advertisement is intended to draw a beneficiary's attention to an MA plan or plans AND include or address content regarding:

- plan premiums,
- cost sharing, or
- benefit information

\*\*including those not mentioning a specific plan by name (as well as instances where such advertisements are made on behalf of multiple MA organizations MUST be submitted to CMS)\*\*

**\*\*Avoid using the term “Senior:”** Inadvertent discrimination occurs if an agent describes or implies that plans are only available for “seniors”, rather than to all Medicare eligible individuals. This discriminates against Medicare eligible consumers under age 65.

**\*\*\*CMS prohibits the use of the word “free” in the following situations:**

1. When describing a zero-dollar premium (This is an inverse to the rule, outlined in the section above, about mandatory supplemental benefits.)
2. When describing any reduction in premiums, deductibles, or cost-shares (such as a Part B premium buy-down, low-income subsidy, or dual eligibility)
3. Cannot use “free” in reference to benefits covered by Original Medicare.

**\*\*\*\*Agents cannot use the word “Medicare” in their titles. Examples of prohibited agent titles include “Medicare Sales Agent”, “Medicare Advisor”, “Medicare Specialist”, “Medicare Expert”, etc.**

**Examples of permitted titles include:**

- ✓ Sales Agent
- ✓ Sales Representative
- ✓ Independent Sales Agent
- ✓ Independent Sales Representative
- ✓ Licensed Agent
- ✓ Licensed Sales Agent
- ✓ Licensed Sales Representative
- ✓ Licensed Insurance Representative

**\*\*\*\*\*BRC, eBRC, or contact forms (print or electronic):**

Except for contact information explicitly provided by the consumer for Medicare Supplement plan quotes, contact requests may not include a request for a date of birth, zip code, Part B effective date, Part A effective date, gender, and requested effective date.

Material Type	Turn-Around Time* (In Business Days**)
"Snail" Mail	2-3 days
Brochure	2-3 days
Email	2-3 days
Newspaper/Magazine	2-3 days
Poster/Flyer/Sign	2-3 days
Radio	2-3 days
Social Media	2-3 days
Telephonic Message/Text	2-3 days
Newsletter	2-3 days
Television Ad	2-3 days
Sales Presentation	3-4 days
PowerPoint Presentation	3-4 days
Video	3-4 days
Website	Up to 7 days

\*AdApproval Compliance may adjust turn-around times based on volume and quantity of materials submitted.

\*\*Business days do not include Saturdays, Sundays and weekdays designated as Holidays.