

Compliance – Why It's Important

The government agency, the Centers for Medicare & Medicaid Services (CMS), oversees the federal Medicare program. CMS holds all Medicare carriers and agencies, like CareFree Insurance Services (CIS), accountable for agents' actions who represent them in public.

Thus, CIS must ensure anyone selling Medicare products under us does so compliantly. We abide by a strict Compliance program. It includes all state and federal laws, guidance, and requirements.

CIS is a Field Marketing Organization (FMO). We provide services to licensed insurance agents and agencies marketing and selling health insurance products from many insurance carriers in the U.S. These products include Medicare Advantage, Medicare Supplement, Prescription Drug, and ancillary health insurance. CIS is part of the CVS Health®/Aetna® Medicare Diversified Distribution Businesses (MDDB).

We contract as a First Tier, Downstream, and Related Entity (FDR) with Medicare plan sponsors. As such, we're aware of the importance of complying with all applicable federal and state regulations. We strive to be an industry leader when it comes to compliance and ethics. Our focus is treating our partners and clients with the utmost integrity.

Our Compliance program monitors and oversees the activities of our subcontractors, downstream and delegated entities. This ensures their compliance with the known requirements of the Medicare program. Those identified as failing in compliance with related rules and guidance or engaging in inappropriate or prohibited marketing activities are at risk of compliance or enforcement actions. Such actions include sanctions, civil money penalties, termination, and forfeiture of compensation taken by CIS and/or CMS.

Our contracted partners and agents can easily access our Compliance resources on the CIS agent website (<u>http://carefreeagency.com</u>). This secure site houses our latest Compliance materials, information, and marketing tools. Materials let agents know what's expected. And provides them guidance on managing themselves in accordance with established laws, policies, and regulatory requirements.

CIS department leaders are responsible for ensuring internal staff refer and be familiar with our program policies, CMS requirements, and federal and state laws. All content is located on the CIS Share Point site under the Compliance folder.