



IMPORTANT NOTICE:
**Prohibited Use of Unapproved Beneficiary
Self-Service Online Platform for Devoted
Sales**

Compliance has recently been made aware that Devoted Health does **NOT** allow the use of Sales from **unapproved beneficiary self-service online platforms**.

Devoted Health has communicated to YourPlanChoice that agents are purchasing “ready-to-enroll” leads from third parties and are submitting enrollments without conducting CMS-compliant sales presentations. The lead generation process involves the beneficiary being directed to a self-service online platform (e.g., NexaEnroll or Benetech) where they are asked to provide personal data, go through plan selection, and sign a disclaimer allowing an agent to evaluate plans and enroll them. The agent is then using this completed form to submit an enrollment on the beneficiary’s behalf.

At this time, Devoted Health does not have sufficient information to validate whether these lead generation practices operate in full compliance with applicable regulations and whether appropriate beneficiary protections are adequately in place to support informed enrollment decisions. Specifically, Devoted has not received confirmation on whether this lead generation platform:

- Enables agents to conduct comprehensive sales presentations that meet all regulatory requirements prior to enrollment submission
- Gives sufficient opportunity for beneficiaries to ask questions and make fully informed enrollment decisions
- Gives beneficiaries the opportunity to receive, review, and acknowledge a completed enrollment application prior to submission
- Provides adequate documentation of beneficiary consent and understanding
- Aligns with all CMS compliance requirements and Devoted's sales presentation and enrollment standards

Until Devoted Health can complete a thorough review and validation of these platforms' compliance status and beneficiary protections, Devoted Health will **NOT authorize their use for Devoted enrollments.**

To ensure beneficiaries have the information necessary to make informed decisions and to maintain our compliance obligations, all Devoted enrollments must be completed through processes that:

- Enable comprehensive beneficiary review of all enrollment materials
- Provide clear documentation of informed consent
- Have been reviewed and approved by Devoted
- Align with CMS-compliant enrollment standards

Devoted Health has communicated the following as **required** actions:

- Communicate this prohibition to all downstream and affiliated agents
- Ensure that no agents within your organization are using this or any other unapproved processes, software, tool, or system for Devoted enrollments
- Ensure that all enrollments are conducted using Devoted-approved, CMS-compliant processes and systems

If any agent, TPMO or subagency in your hierarchy is using these lead generation processes or tools, please self-report this activity to agencyoversight@devoted.com along with the corrective actions you have taken or plan to take.

Please use the subject line “Unapproved Online Platform and Reporting” for either reporting activity or any questions regarding this issue.

YourPlanChoice Compliance is issuing this important notice to ensure all agents and agencies **review their current lead generation processes or tools to confirm that leads from unapproved beneficiary self-service online platforms are not being used for Devoted Health sales.**

As a reminder, agents are personally responsible for ensuring that their lead generation and marketing activities comply with carrier and CMS requirements and all marketing materials used for lead generation must be approved by carriers and CMS prior to use. Certain carriers also require the approval of permission to contact pieces even if they do not meet the definition of “marketing” as defined by CMS. The use of unapproved marketing materials places both the agent and YourPlanChoice at risk for corrective action.

If you have additional questions on lead generation practices, please contact your direct upline.

Required Reading and Distribution

This Important Notice is required to be distributed to all agents/agencies in your hierarchy. You are required to ensure that you and your agents are familiar with this Important Notice and are not using unapproved beneficiary self-service online platforms as a lead source for Devoted Health.

Please also see the YourPlanChoice policy on Use of Lead Vendors located in the Polices section of [Compliance - YourFMO](#)

