Medicare Related Website Advertising Requirements, Personal Enrollment Tools, Personal URLs (PURLs), and Permission to Contact (PTC, BRC, eBRC)

This bulletin provides an overview of the content requirements for websites, landing pages, PURLs (Personal URLs), and enrollment tools used in connection with Medicare Advantage, Medicare Part D, and related Medicare products. All activities must comply with CMS regulations, carrier requirements, and internal standards. Please contact your upline or your AmeriLife affiliate partner for additional questions.

Use of Websites & Online Enrollment/Self-Enrollment Tools (Including PURLs)

Any website or digital platform that includes online quoting, enrollment, or self-enrollment functionality (including embedded applications, PURLs, or direct enrollment links) must adhere to the following:

- Submission to Marketing Compliance for review and approval prior to use.

- HPMS filing and carrier approval prior to use.
- Enrollment pathways must contain required CMS disclosures prior to plan selection or enrollment initiation.
- Consumers must clearly understand they are applying for Medicare plan coverage.
- Consent and authorization requirements must be properly captured and retained.
- A self-enrollment platform may not be disguised as a permission-to-contact mechanism.

Permission to Contact (PTC) Requirements

Under 42 CFR 423.2264, Medicare organizations and agents may contact beneficiaries when the beneficiary has initiated contact or provided permission to be contacted. PTC forms and beneficiary contact must comply with the Medicare Communications and Marketing Guidelines (MCMG) as well as Health and Human Services HIPAA Guidance.

Disclaimers and Carrier Requirements

All TPMO marketing materials must include the CMS-required disclaimer for the applicable plan year.

TPMO DISCLAIMER Effective PY 2027:

"We do not offer every plan available in your area. Currently we represent [insert number of organizations] organizations which offer [insert number of plans] products in your area. Please contact Medicare.gov, 1-800-MEDICARE to get information on all of your options."

Do not use PY 2027 disclaimer for PY 2026 Assets.

SEP DISCLAIMER

Brackets are required if you are using this in a plan year asset, as this disclaimer does not apply during AEP:

[Enrollment in a plan may be limited to certain times of the year unless you qualify for a Special Enrollment Period or are in your Medicare Initial Enrollment Period.]

Additional Special Enrollment Period Requirements

- SEP disclaimers must be included on materials used outside of AEP.

- SEP qualifiers should appear “early and often” and should not be buried in disclaimers or body content.

- Examples of SEP qualifiers include: [New to Medicare], [Turning 65], [Losing Coverage], and [Moving].

Website Contact Information Requirements

42 CFR §§ 422.111(h), 422.2262(c), 423.128(d), 423.2262(c)

- Hours of operation, TTY, and a phone number must be included.
- License designation must be included, e.g., Licensed Insurance Agent and/or Licensed Sales Agent.
- Business name must be clearly identifiable.

Carrier-Specific Website Review Requirements

Certain carriers may require prior review and approval of web-related materials, regardless of whether the asset is considered marketing or communication in nature.

This may include:

- Permission to Contact (PTC) forms (eBRC, BRC, mailer(s)).

- Marketing and communication educational videos, including YouTube videos, Television advertisements, webinars, video presentations, and social media videos. If these approved assets will reside on a website, a separate review may be required by carrier(s).

Asset Validity & Expiration

- Annual Enrollment Period (AEP) materials expire December 8, 2026, and require re-submission.

- Plan Year (PY) approved materials are valid through September 30 of applicable year.

Example: Approved Dec 1, 2026, for PY2027 → valid through Sept 30, 2027.

Important Notice: This Compliance Bulletin is intended strictly for licensed agent use only. Do not distribute to clients, prospects, or any unauthorized individuals.

Please share this with all agents in your hierarchy so they are aware of these requirements.

You can find this bulletin and other helpful reminders and policies on YourFMO.com on the Compliance tab under Bulletins and Other Guidance:

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