



January 12, 2010

Dear Bravo Sales Associate,

In the fall of 2009 I sent to each of you a very serious message regarding Bravo's "zero tolerance policy" relative to sales complaints/misrepresentations. At that time I communicated that agents who did not sell our Medicare Advantage products in a 100% compliant fashion would risk contract termination. Consequently, a number of agents who represented Bravo had their contracts terminated.

As we enter the Open Enrollment Period, I have cause to deliver another very serious message. As a result of Secret Shopping activities conducted during AEP by CMS, Bravo has received a "Notice of Noncompliance" from the Department of Health and Human Services. Simply stated, the letter notified us that as a result of Secret Shopper activities they had conducted, CMS found numerous Bravo sales representatives to be deficient in the manner in which they conducted sales presentations.

The violations that they identified surprised and dismayed us. From our perspective, there is no reason why a Bravo Sales Representative should **EVER** conduct anything but a 100% compliant sales presentation. The deficiencies in selling practices CMS called out were aspects of a sales presentation that every Bravo agent is trained on during the certification process. You have been provided a Sales Presentation checklist that clearly calls out the required components of a compliant presentation. Evidently, some agents are failing to "stick to the script". A single departure from the approved check-list can result in a finding of noncompliance.

Specific examples of deficiencies occurred when an agent:

- did not identify the products they would be presenting at the start of their presentation
- cancelled/changed events without the proper notification to CMS
- did not make the appropriate disclosures when presenting PFFS
- did not present the entire presentation, even if a beneficiary had already made a decision to purchase

To mitigate against these deficiencies, the following expectations have been put in place and you are required to adhere to these requirements:

- For group presentations, use the approved Sales Presentation power point. Contact your Account Executive for regionally specific versions..
- Use the Sales Presentation Check-List. EVERY item on that list must be covered for your presentation to be 100% compliant.
- Avoid making any definitive statements. Off-script comments can be taken out of context. You must not use phrases such as "Bravo is the best" or "this is the best plan".
- Contact the "SalesComplianceQuestions@bravohealth.com web site if you have and questions/concerns over the sales tactics.
- Above all else, sell with integrity in every encounter with a Medicare beneficiary

We believe that by adhering to these requirements, you eliminate the risk of being found deficient in your sales tactics. And after all, we all share the common goal of helping Medicare beneficiaries Live Life Well.

Sincerely,



Gilbert Miller  
Executive Vice President, Sales