

State: Arkansas **Filing Company:** QualChoice Life and Health Insurance Company, Inc.

TOI/Sub-TOI: MS06 Medicare Supplement - Other/MS06.000 Medicare Supplement - Other

Product Name: MediQ65

Project Name/Number: MediQ65 Internet Advertising/

Filing at a Glance

Company: QualChoice Life and Health Insurance Company, Inc.

Product Name: MediQ65

State: Arkansas

TOI: MS06 Medicare Supplement - Other

Sub-TOI: MS06.000 Medicare Supplement - Other

Filing Type: Advertisement

Date Submitted: 07/23/2012

SERFF Tr Num: QUAC-128592087

SERFF Status: Closed-Filed-Closed

State Tr Num:

State Status: Filed-Closed

Co Tr Num:

Implementation: On Approval

Date Requested:

Author(s): Jim Couch, Liz Hubbard

Reviewer(s): Stephanie Fowler (primary)

Disposition Date: 08/24/2012

Disposition Status: Filed-Closed

Implementation Date:

State Filing Description:

State: Arkansas **Filing Company:** QualChoice Life and Health Insurance Company, Inc.
TOI/Sub-TOI: MS06 Medicare Supplement - Other/MS06.000 Medicare Supplement - Other
Product Name: MediQ65
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General Information

Project Name: MediQ65 Internet Advertising Status of Filing in Domicile:
 Project Number: Date Approved in Domicile:
 Requested Filing Mode: Review & Approval Domicile Status Comments:
 Explanation for Combination/Other: Market Type: Individual
 Submission Type: New Submission Individual Market Type:
 Overall Rate Impact: Filing Status Changed: 08/24/2012
 State Status Changed: 08/24/2012
 Deemer Date: Created By: Jim Couch
 Submitted By: Jim Couch Corresponding Filing Tracking Number:

Filing Description:
 This filing reflects advertising language that will placed on the internet. Example is included with attached .pdf file.

Company and Contact

Filing Contact Information

Jim Couch, VP of Compliance jim.couch@qualchoice.com
 12615 Chenal Parkway, Suite 300 501-228-7111 [Phone] 5118 [Ext]
 Little Rock, AR 72211 501-707-6729 [FAX]

Filing Company Information

QualChoice Life and Health Insurance Company, Inc. CoCode: 70998 State of Domicile: Arkansas
 12615 Chenal Parkway, Suite 300 Group Code: Company Type: Life & Health
 Little Rock, AR 72211 Group Name: State ID Number:
 (501) 228-7111 ext. [Phone] FEIN Number: 71-0386640

Filing Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? No
 Fee Explanation:
 Per Company: No

Company	Amount	Date Processed	Transaction #
QualChoice Life and Health Insurance Company, Inc.	\$50.00	07/23/2012	61115455

SERFF Tracking #:

QUAC-128592087

State Tracking #:

Company Tracking #:

State: Arkansas

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Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Filed-Closed	Stephanie Fowler	08/24/2012	08/24/2012

Objection Letters and Response Letters

Objection Letters

Status	Created By	Created On	Date Submitted
Pending Industry Response	Stephanie Fowler	07/30/2012	07/30/2012

Response Letters

Responded By	Created On	Date Submitted
Jim Couch	08/17/2012	08/17/2012

SERFF Tracking #:

QUAC-128592087

State Tracking #:

Company Tracking #:

State:

Arkansas

Filing Company:

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Disposition

Disposition Date: 08/24/2012

Implementation Date:

Status: Filed-Closed

Comment:

Rate data does NOT apply to filing.

Schedule	Schedule Item	Schedule Item Status	Public Access
Form (revised)	MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012	Filed-Closed	Yes
Form	MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012	Replaced	No

State: Arkansas **Filing Company:** QualChoice Life and Health Insurance Company, Inc.
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Product Name: MediQ65
Project Name/Number: MediQ65 Internet Advertising/

Objection Letter

Objection Letter Status	Pending Industry Response
Objection Letter Date	07/30/2012
Submitted Date	07/30/2012
Respond By Date	08/29/2012

Dear Jim Couch,

Introduction:

This will acknowledge receipt of the captioned filing.

Objection 1

Comments: **Headline #1:** Please revise this headline to reflect that QualChoice's customer service is better. This statement is misleading since the Medicare Supplement plans are very much the same,

Objection 2

- MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012, (Form)

Comments: Where do these links take the consumer? Has the landing page been filed with this Department?

Objection 3

- MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012, (Form)

Comments: **Text Lines of #2 and #3:** Please add the word "plans" after the word "supplement". This is being allowed in lieu of actually stating that these are insurance policies due to the perceived lack of space and on the condition that the landing page that these links are attached to clarifies that these "supplements" are in fact insurance policies.

Objection 4

- MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012, (Form)

Comments: **Headline #3:** Please add the word "Sometimes" to the beginning of this sentence.

Conclusion:

A.C.A. 23-79-109(1)-(5) sets forth the procedure by which filings may be deemed approved upon the expiration of certain time periods with no affirmative action by the commissioner. If the commissioner determines that additional information is needed to make a decision regarding approval, such request for information will be made to the company. The filing will not be considered complete until said additional information is received. The time periods set forth in this statute will not begin to run until the filing is complete.

Please feel free to contact me if you have questions.

Sincerely,

Stephanie Fowler

SERFF Tracking #:

QUAC-128592087

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Company Tracking #:

State:

Arkansas

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TOI/Sub-TOI:

MS06 Medicare Supplement - Other/MS06.000 Medicare Supplement - Other

Product Name:

MediQ65

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MediQ65 Internet Advertising/

Response Letter

Response Letter Status	Submitted to State
Response Letter Date	08/17/2012
Submitted Date	08/17/2012

Dear Stephanie Fowler,

Introduction:

Response 1

Comments:

We have modified the language per your request.

Related Objection 1

Comments: Headline #1: Please revise this headline to reflect that QualChoice's customer service is better. This statement is misleading since the Medicare Supplement plans are very much the same,

Changed Items:

No Supporting Documents changed.

SERFF Tracking #:

QUAC-128592087

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Product Name: MediQ65

Project Name/Number: MediQ65 Internet Advertising/

Form Schedule Item Changes

Item No.	Form Number	Form Type	Form Name	Action/ Action Specific Data	Readability Score	Attachments	Submitted
1		ADV	MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012	Initial		MediQ65 Online Ads to AID_080712.pdf	Date Submitted: 08/17/2012 By: Jim Couch

Previous Version

1		ADV	MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012	Initial		MediQ65 Online Ads to AID_1.pdf	Date Submitted: 08/17/2012 By: Jim Couch
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State: Arkansas **Filing Company:** QualChoice Life and Health Insurance Company, Inc.
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Product Name: MediQ65
Project Name/Number: MediQ65 Internet Advertising/

No Rate/Rule Schedule items changed.

Response 2

Comments:

The landing page was previously approved by the Department.

Related Objection 2

Applies To:

- MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012, (Form)

Comments: Where do these links take the consumer? Has the landing page been filed with this Department?

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 3

Comments:

We have made the requested changes.

Related Objection 3

Applies To:

- MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012, (Form)

Comments: Text Lines of #2 and #3: Please add the word "plans" after the word "supplement". This is being allowed in lieu of actually stating that these are insurance policies due to the perceived lack of space and on the condition that the landing page that these links are attached to clarifies that these "supplements" are in fact insurance policies.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Response 4

Comments:

We have modified the language to address your concern.

Related Objection 4

SERFF Tracking #:

QUAC-128592087

State Tracking #:

Company Tracking #:

State:

Arkansas

Filing Company:

QualChoice Life and Health Insurance Company, Inc.

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Applies To:

- MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012, (Form)

Comments: Headline #3: Please add the word "Sometimes" to the beginning of this sentence.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Conclusion:

Sincerely,

Jim Couch

SERFF Tracking #:

QUAC-128592087

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Form Schedule

Lead Form Number:

Item No.	Schedule Item Status	Form Number	Form Type	Form Name	Action/ Action Specific Data	Readability Score	Attachments
1	Filed-Closed 08/24/2012		ADV	MediQ65 Medicare Supplemental Insurance Plan Online Advertising July 11, 2012	Initial:		MediQ65 Online Ads to AID_080712.pdf

Form Type Legend:

ADV	Advertising	AEF	Application/Enrollment Form
CER	Certificate	CERA	Certificate Amendment, Insert Page, Endorsement or Rider
DDP	Data/Declaration Pages	FND	Funding Agreement (Annuity, Individual and Group)
MTX	Matrix	NOC	Notice of Coverage
OTH	Other	OUT	Outline of Coverage
PJK	Policy Jacket	POL	Policy/Contract/Fraternal Certificate
POLA	Policy/Contract/Fraternal Certificate: Amendment, Insert Page, Endorsement or Rider	SCH	Schedule Pages

MediQ65[®] Medicare Supplement Insurance Plan

ONLINE ADVERTISING

Date: 7/11/2012; Resubmitted: 8/07/12

Request approval for the following online ads with Google and Microsoft.

1. HEADLINE: Better Medicare ~~supplement~~ **Service**

TEXT: 9 out of 10 QualChoice members rate our service outstanding.

DESTINATION URL: www.mediq65.com

2. HEADLINE: Need more than Medicare?

TEXT: MediQ65[®] is Arkansas' affordable, flexible supplement **plans** from QualChoice.

DESTINATION URL: www.mediq65.com

3. HEADLINE: **Is Medicare enough?** ~~Medicare isn't enough.~~

TEXT: MediQ65[®] supplement **plans** from QualChoice helps cover what Medicare won't.

DESTINATION URL: www.mediq65.com

ONLINE ADVERTISING PROCESS

- QualChoice purchases search words.
- When that search word is typed into the search engine (i.e., Google) our 'ad copy' comes up in the results.
- Ads on the left (with yellowish background) are "featured" ads that come from the text of the ads on the right.
- Ads on the right are the typical representation.
- Ads will be hyperlinked to www.mediq65.com

Below is a SAMPLE screen shot when 'medicare insurance' is typed into Google. *Consumers sees a Humana ad and an ABCBS ad.*

The screenshot shows a Google search for "medicare insurance". The search bar contains the text "medicare insurance" and a magnifying glass icon. Below the search bar, it says "Search" and "About 12,700,000 results (0.17 seconds)".

On the left side, there is a navigation menu with the following items: Web, Images, Maps, Videos, News, Shopping, More, Little Rock, AR, and Change location.

The main content area is divided into two columns of advertisements. The left column has a yellow background and contains three ads:

- Medicare Insurance Plans - We'll Help You Compare & Save**
www.choosemedicareplan.com/Insurance
Speak to a **Medicare** Advisor Now!
- Humana® Medicare Plans** 1 (877) 675 8755
www.humana-medicare.com/
Get a Humana **Medicare** Plan with an Affordable Premium. Enroll Today
Medicare Advantage Plans - Medicare Part D Plans - Enroll Online Today
- Arkansas Medicare Plans | Arkansas.PlanPrescriber.com**
arkansas.planprescriber.com/
Lose Your **Insurance** or Move Out of State? Enroll in a Plan Today!
Medicare Plans Made Easy - Find Medicare Plans Right for You

The right column contains three ads:

- Medicare Supplement in AR**
www.medicare-supplemental.com/Arkansas
Find Multiple Medigap Plan Options.
100% Free Quote. Compare Plans Now!
- Arkansas Blue Cross**
www.arkansasbluecross.com/Medicare
Apply For A **Medicare** Supplement Plan. Competitive Prices & More.
- Medicare Part D Drug Plan**
www.aarpmedicareplans.com/PartD
1 (877) 504 6740
AARP® MedicareRx Plans **insured** through UnitedHealthcare.