



Conflict of Interest

User Guide and FAQ



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What is Conflict of Interest (COI)?

A conflict of interest occurs when your interests or activities, or in some cases those of your immediate family member, could affect or appear to affect your decision making on behalf of UnitedHealthcare or because your objectivity could be questioned because of those interests or activities. For the purpose of UnitedHealthcare's disclosure and attestation requirement, your spouse/domestic partner, children, parents, or siblings, including step-relations and in-laws are considered immediate family members but your aunts, uncles, cousins, and grandparents are not.

COI Attestation and Disclosure

Agents, solicitors, and sales leaders contracted by UnitedHealthcare or employed by UnitedHealth Group or its affiliates, who are required to disclose and attest to their conflicts of interest through the UnitedHealthcare sales operations process, must complete their COI attestation and disclosure within 90 calendar days of receipt of the email invitation to do so.

Starting July 1, 2023, individuals will use an automated COI attestation and disclosure process through Sircon (sometimes referred to as PISA). You will no longer complete your attestation through the product certification process. Individuals will receive an email invitation on the date their Party ID (PID) is issued if newly onboarding or on their PID anniversary date.

This user guide will walk you through the process so that you are comfortable with what to expect when you receive your email invitation to complete your COI attestation and disclosure.

Reminders

Promptly complete your COI attestation and disclosure after receiving the email invitation to avoid receiving reminders. At 90 calendar days after receiving the email invitation, non-employee agents (including solicitors) will receive a termination notification if their COI attestation and disclosure has not been submitted. Employees of UnitedHealth Group or its affiliates will be referred to corrective action.

Questions

For questions or assistance related to the conflict-of-interest attestation and disclosure requirement or process, email Agent_COI@UHC.com. Please include a screen shot if you are having difficulty with a particular screen. See also the Frequently Asked Questions section in this document.



COI Attestation and Disclosure Email Invitation

On your PID anniversary date (or PID issue date for onboarding individuals), you will receive an email invitation to complete your annual COI attestation and disclosure. The email sender will be UHC_Contracting@sircon.com and the email subject line will be “(Your Name), UnitedHealthcare invites you to complete your conflict-of-interest attestation and disclosure requirement”. The email will have a link to the Sircon (<https://platform.sircon.com/>) system.

- Click **Get Started With Sircon** to begin.

The image displays two screenshots of an email invitation. The left screenshot shows the full email content, including a header from UHC_Contracting@sircon.com, a 'Let's get started' section with a 'GET STARTED WITH SIRCON' button, and a 'Questions' section. The right screenshot is a zoomed-in view of the 'Let's get started' section, showing three steps: 'Begin' (Select the GET STARTED WITH SIRCON link), 'Complete' (The process will guide you through the review and completion of your UnitedHealthcare Sales Distribution Conflict-of-Interest Attestation and Disclosure questionnaire), and 'Finalize' (Follow the prompts to send us your completed attestation and disclosure). The 'GET STARTED WITH SIRCON' button is circled in red in the right screenshot.

Completing the COI

- Log into Sircon. (For help getting started in Sircon, see the appendix at the end of this guide for instructions.)
- On the Sircon home page, click the **To Do tab** to begin.

Step 1: To Do Tab

- Under the **Due Later** section, the COI attestation and disclosure invitation will be listed.
- Click the **COI task** to begin the process.

The screenshot shows the Sircon web application interface. The 'To Dos' tab is selected and circled in red. Under the 'DUE LATER' section, a task titled 'UnitedHealthcare invites you to complete your Sales Distribution Conflict-of-Interest Attestation and Disclosure' is highlighted in yellow, with a red arrow pointing to it. The interface also shows sections for 'Licenses' and 'South Carolina Continuing Education'.



- Review the information and instructions.
- Click **Continue**

Step 2: Answer Scenario Questions

- The scenarios presented to you are based on whether you are contracted with UnitedHealthcare or are an employee of UnitedHealth Group or its affiliates.
- Read each scenario description and the questions that follow carefully.
- Each question requires a yes or no answer. If you answer yes, you will be asked to provide additional information. If you selected yes in error and already clicked continue, click the Back button at the bottom of screen in order to change your response.
- For each question, continue to answer yes and provide the information requested if you have additional conflicts or answer no when you are finished disclosing conflicts for that question.
Note: For each question, you can enter up to five conflicts. If you need to disclose more than five conflicts for a particular question, please contact Agent_COI@uhc.com for instructions.
- **There are four scenario categories that will be presented.** Some questions ask you about your immediate family members and others relate only to you.
- Read each of the scenarios and select **NO** or **YES**. You must select a response to proceed to the next screen.

Note: This guide shows screens and scenario questions for a non-UnitedHealthcare employee (i.e., contracted). If you are an employee of UnitedHealth Group or its affiliates, your screens and questions may vary slightly.



Scenario 1–Part 1: Relationships with providers and UnitedHealthcare business partners

Interview Questions

Disclosure Scenarios

Scenario 1: Relationship with a Health Care Provider or UnitedHealthcare Business Partner

You or your immediate family member has a direct or indirect ownership interest in AND/OR is an employee, contractor, or consultant of AND/OR holds a position of influence with a health care provider or UnitedHealthcare business partner.

The following questions in this scenario relate to you.

Do you have a direct or indirect ownership interest in a health care provider? No Yes

Are you an employee, contractor, or consultant of a health care provider? No Yes

Do you hold a position of influence with a health care provider? No Yes

Do you have a direct or indirect ownership interest in a UnitedHealthcare business partner? No Yes

Are you an employee, contractor, or consultant of a UnitedHealthcare business partner? No Yes

Do you hold a position of influence with a UnitedHealthcare business partner? No Yes

Scenario 1–Part 2: Immediate family members' relationships with providers and UnitedHealthcare business partners

The following questions in this scenario relate to your immediate family members.

Do any immediate family members have a direct or indirect ownership interest in a health care provider? No Yes

Are any immediate family members an employee, contractor, or consultant of a health care provider? No Yes

Do any immediate family members hold a position of influence with a health care provider? No Yes

Do any immediate family members have a direct or indirect ownership interest in a UnitedHealthcare business partner? No Yes

Are any immediate family members an employee, contractor, or consultant of a UnitedHealthcare business partner? No Yes

Do any immediate family members hold a position of influence with a UnitedHealthcare business partner? No Yes

Back Continue

Scenario 2: Relationship with organizations that interact with Medicare beneficiaries (Individual and Family Plan agents skip this section) Note: if you are an IFP only producer, you will not need to answer scenario 2 and will be prompted to continue.

Interview Questions

Disclosure Scenarios

Scenario 2: Relationship with an Organization that Interacts with Medicare Beneficiaries

You have a direct or indirect ownership interest in AND/OR are an employee, contractor, or consultant of AND/OR hold a position of influence with an organization that has any interaction with Medicare beneficiaries.

Do you have a direct or indirect ownership interest in an organization that has any interaction with Medicare beneficiaries? No Yes

Are you an employee, contractor, or consultant of an organization that has any interaction with Medicare beneficiaries? No Yes

Do you hold a position of influence with an organization that has any interaction with Medicare beneficiaries? No Yes

Back Continue

Scenario 3: Relationship between employee and agent/agency appointed with UnitedHealthcare

Interview Questions

Disclosure Scenarios

Scenario 3: Relationship between UnitedHealth Group Employee and Agent/Agency

You have an immediate family member who is an employee of UnitedHealth Group or its affiliate.

Are any immediate family members employed by UnitedHealth Group or its affiliate? No Yes

Back Continue

Scenario 4: Other Carrier Relationship (not everyone will see this scenario)

Interview Questions

Disclosure Scenarios

Scenario 4: Simultaneous Employment and Contract with UnitedHealthcare or Another Insurance Carrier

You are in a non-employee contractual relationship with UnitedHealthcare and are simultaneously an employee of UnitedHealth Group or its affiliate.

Are you currently employed by UnitedHealth Group or its affiliate? No Yes

Back Continue



Click continue as you finish each section.

Are you an employee, contractor, or consultant of an organization that has any interaction with Medicare beneficiaries? No Yes

Provide the following information

Name of organization

Location of the organization

City State

Describe your role

Are you an employee, contractor, or consultant of another organization that has any interaction with Medicare beneficiaries? No Yes

Do you hold a position of influence with an organization that has any interaction with Medicare beneficiaries? No Yes

Provide the following information

Name of organization

Location of the organization

City State

Describe your position of influence

Do you hold a position of influence with another organization that has any interaction with Medicare beneficiaries? No Yes

Note: this screen illustrates additional information that may be requested following a “yes” response.

Step 3: Management Plans

Each disclosed conflict of interest is evaluated to determine if it can be managed. For manageable conflicts, you will receive a management plan that outlines how UnitedHealthcare intends to manage the conflict. Management plans must be acknowledged upon receipt. When a disclosed conflict cannot be managed, you will be instructed on your options.

- If you answer YES to a question within a scenario, you will receive feedback at the end of that scenario regarding the conflict. If a management plan is presented, read through the plan and select **I AGREE** to indicate that you have read the management plan and agree to comply with its terms.

Note: Only select “I DISAGREE” if you are not willing to comply with the management plan presented. Do not select ‘I DISAGREE’ if you do not understand or have questions about the management plan. Instead, take a screen shot of the management plan and send it along with your question to Agent_COI@uhc.com. Selecting “I DISAGREE” will result in you getting a 30-day termination notification or, if an employee of UnitedHealthcare or its affiliates, entering the corrective action process.

- You will be presented with a plan for each question where you answered YES. If you had more than one conflict to disclose for a question, the management plan will apply to all conflicts for that question. If you answered yes to more than one question, you will need to continue scrolling through each management plan and select I AGREE or I DISAGREE for each to proceed.



Interview Questions

Management Plans

If a conflict management plan is presented, read through the plan and select 'I AGREE' to indicate that you have read the management plan and agree to comply with its terms. If you do not agree to the presented management plan select 'I DISAGREE'. Disagreeing with a management plan may result in termination.

You answered yes and provided information related to the following question:

Are you an employee, contractor, or consultant of a health care provider? Yes

This is a manageable conflict. To manage this conflict, you must agree to the following management plan:

[Redacted Management Plan Text]

This management plan will remain in effect as long as the conflict disclosed exists. Notify us at Agent_COI@uhc.com at such time the conflict covered by this management plan no longer exists. Failure to acknowledge and/or comply with the management plan outlined above may result in corrective and/or disciplinary action up to and including termination of your contract and/or appointment(s).

I AGREE

I DISAGREE

- In some cases, the COI team must review the information you have disclosed in order to provide a management plan or give you direction on next steps. You will be advised at the end of each applicable scenario when this situation has occurred.

Reminder: If at any point during the interview you have a question, take a screen shot and email it with your question to Agent_COI@uhc.com. You can exit Siron and reenter the interview another day once your question is answered. Your entries will save if you complete a section, click Continue (bottom right), and then click Save and Exit (top right).

Step 4: Attestation

- After completing the disclosure section, read the Attestation section and select **I ATTEST** and then **Continue**.

Interview Questions

Attestation

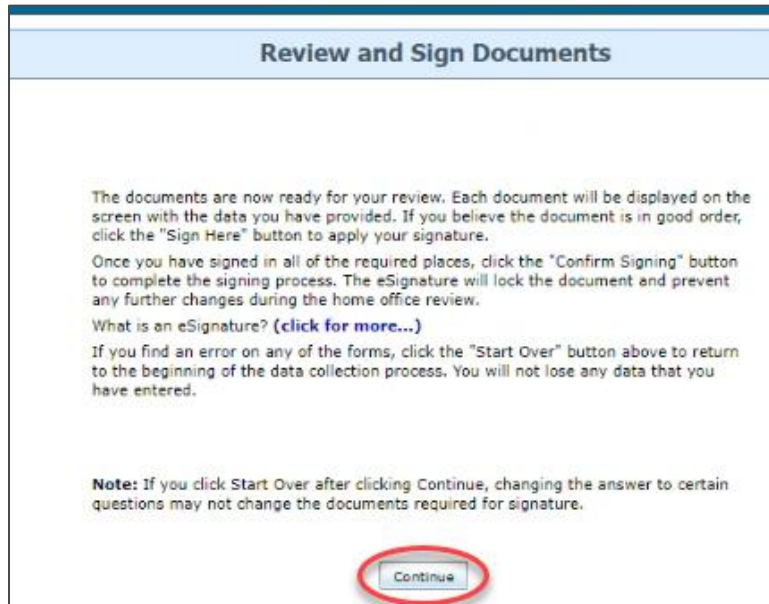
I hereby attest that all information submitted in this conflict-of-interest questionnaire is true, accurate, and complete to the best of my knowledge and belief. I understand that submitting false information or omitting pertinent and material information may result in corrective action up to and including termination.

I ATTEST



Step 5: Review and Sign

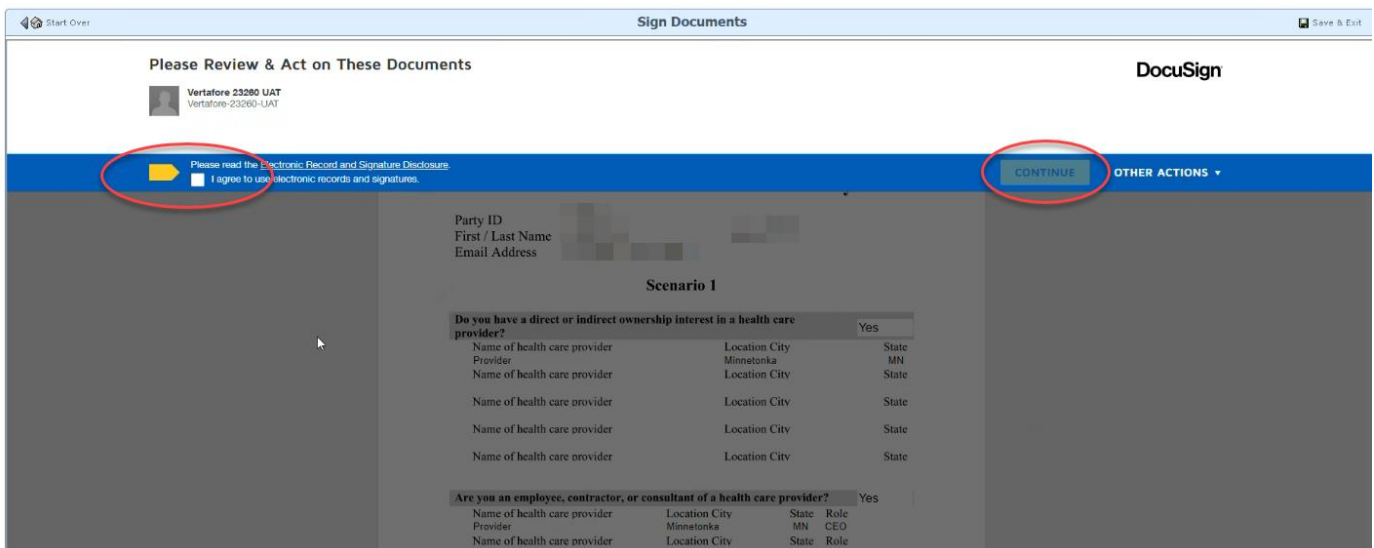
- In order to save a copy of your interview in your Sircon account, you will receive instructions to review and sign your documents.
- Click **Continue** after reviewing the instructions.



Step 6: DocuSign

This step creates a record of your interview that you can access at any time by logging into your Sircon account. You cannot change any answer or information provided during the interview stage.

- At the top, click the **I agree to use electronic records and signatures** to remove the shading and scroll through your COI attestation and disclosure document. **Note:** On the summary page, for scenarios 3 and 4, you will see both the employee and non-employee versions of the question. Your response will only display for the version of the interview you completed and the other will be blank.



- Click **Finish**.

Step 7: Print Packet

In this step, you can print COI attestation and disclosure related documents for your records. You can return to your Sircon account at any time to review these documents.

- To print a document, click on the **print icon** in the action column.
- When you are finished printing, click **Return to Sircon** or **Exit** to close the browser.

Thank You Email

When you submit your COI attestation and disclosure, you will receive a thank you email confirming that your COI is complete.



Frequently Asked Questions (FAQ)

Q: What should I do if I cannot find my email invitation?

A: First, verify the date your Party ID (PID) was issued and the email you have on file with UnitedHealthcare. Your COI attestation and disclosure email invitation will be sent on the date your PID is issue if you are newly onboarding or on your PID anniversary date thereafter. Second, if you are expecting the email invitation, check your SPAM or Junk Mail folder. Alternatively, log in to your Sircon account and click on “UnitedHealthcare invites you to complete your Sales Distribution Conflict-of-Interest Attestation and Disclosure” if listed in your To Do tab. If, after completing those two steps, you have concerns about not having received an email invitation, contact Agent_COI@uhc.com.

Q: What should I do if I deleted my email invitation?

A: Log in to your Sircon account (<https://platform.sircon.com/>) and click on “UnitedHealthcare invites you to complete your Sales Distribution Conflict-of-Interest Attestation and Disclosure” if listed in your To Do tab. Reminder emails have the Get Started With Sircon button, so you do not have to have your original invitation email.

Q: What should I do if I cannot complete my invitation once I start it?

A: To come back at a later time to complete your interview, click Save and Exit. Make sure you complete your interview within 90 calendar days of receiving the email invitation.

Q: I completed my COI attestation and disclosure but forgot to disclose a conflict I have. What should I do?

A: Email Agent_COI@uhc.com and explain your situation. You will be instructed on next steps.

Q: I disclosed a conflict when I completed my COI attestation and disclosure, but it no longer exists. What should I do?

A: Email Agent_COI@uhc.com and explain your situation. You will be instructed on next steps.

Q: Who do I contact if I am having technical issues with Sircon or unable to get into Sircon?

A: Contact the **Producer Help Desk (PHD)**

- Phone: 866-235-4095
- Email: ACABrokerSupport@uhc.com

Q: What should I do if I do not understand a question in a scenario?

A: Take a screen shot of the question you do not understand and email it with your question to Agent_COI@uhc.com.

Q: What should I do if a management plan presents and I do not understand it?

A: Do not click “I Disagree” if you do not understand the management plan or have questions related to it. Take a screen shot of the management plan and email it with your question to Agent_COI@uhc.com.

Appendix



Follow the instructions below according to whether you are new to a Sircon account or have an existing Sircon account.

Getting Started with Sircon: New Account

- Click on **Create Account**
- Enter your NPN
- Click **Verify Your Details**

- Review the account that appears and click **Continue** (if this is not you, click on try again)
- Select 3 security questions by using the **drop-down menus** and fill in the answers
- Click **Continue**



- Enter a recovery email
- Click **Submit**

The screenshot shows a web page titled "Invitation to Conflict of Interest Attestation and Disclosure" with a "Help" link in the top right. A navigation bar contains four tabs: "INDIVIDUAL DETAILS", "SECURITY QUESTIONS", "RECOVERY EMAIL" (which is highlighted with an orange bar), and "CREATE YOUR PASSWORD". The main heading is "Recovery Email". Below it, a message reads: "Please enter a second email address you can use to recover your account if you lose access to your account's primary email. If you do not have a second email now, you can add it later in your profile." There are two input fields: "Email" and "Confirm Email", both containing yellowed text. At the bottom right, there are two buttons: "Back" and "Submit". The "Submit" button is circled in red. At the bottom left, there is a link: "Not Right Now? If you would prefer to set this option later, you can [Skip This Step](#)".

- Create a password
- Click the **I acknowledge** box to agree to the terms and conditions
- Click **Create My Account**
- Follow the process outlined in the "Completing the COI" section.

The screenshot shows a web page titled "Invitation to Conflict of Interest Attestation and Disclosure" with a "Help" link in the top right. A navigation bar contains four tabs: "INDIVIDUAL DETAILS", "SECURITY QUESTIONS", "RECOVERY EMAIL", and "CREATE YOUR PASSWORD" (which is highlighted with an orange bar). The main heading is "Create an account to view your request." Below this, there is a visual representation of the account creation process showing a profile icon for "MARY ANN AANSTOOS" (with email "uaat1sat+12@gmail.com") and a building icon for "UnitedHealthcare 2", connected by a double-headed arrow. Below this, a message reads: "There are just a couple more things we need". There are two input fields: "Create a Password" and "Retype Your Password", both containing yellowed text. Below the fields, there is a checkbox with the text: "I acknowledge that I have read and agree to the [Terms & Conditions](#)". At the bottom right, there are two buttons: "Back" and "Create My Account". The "Create My Account" button is circled in red.





Getting Started with Sircon: Existing Account

- Sign into your Sircon account (<https://platform.sircon.com/>)
- Follow the process outlined in the “Completing the COI” section.

Invitation to Conflict of Interest Attestation and Disclosure Help

Sign in to view and complete your onboarding request.

UnitedHealthcare 2

It looks like you already have a Sircon Account

Sign In

By signing in to your account, you will be able to view your information and manage requests with UnitedHealthcare 2.

Forward Invite

You can forward this invitation and accept with a different email, however it will require you create or use a different Sircon account.

Sign In

Email

Password



[Forgot password or lost access to your email? Get help signing in](#)

Back **Sign In**

*Note: If you receive a pop-up notification that your email already exists, enter a new email address and click **Forward Your Invite**. This happens when you share an email address with other parties. You must have your own email address to log in to Sircon and complete your COI attestation and disclosure.*

Invitation to Conflict of Interest Attestation and Disclosure Help

Forward your request to a different email.

UnitedHealthcare 2

Why do I need to use a different email?

It looks like you already have a Sircon account, but the person on the invite does not match your account. This invitation requires a unique individual associated with the account.

NAME ON INVITE

NAME ON ACCOUNT

To get the full benefits of your Sircon account, we recommend a separate account per individual. Use the **Forward** option to send this invite to a different email address.

To continue, please forward your invite to a different email address.

Email

Forward Your Invite

If you are having Sircon technical issues, contact the **Producer Help Desk (PHD)** via one of these options:

- Phone: 866-235-4095
- Email: ACABrokerSupport@uhc.com

