



Website Compliance Cases Updated Guidance for BCMs

Website Queue Guidance for Branch Controls Managers

Updated 9.13.24

There compliance workflows for advisor-created custom web content within Equitable Advisors Marketing Suite was recently updated. These updates impacts three specific website case types within your compliance queue: **Blog Articles**, **Blog Introductions**, and **Custom Section Content**.

CONTENT TYPE DEFINITIONS:

Case Type	Definition
Blog Article	FP-written custom blog article. This content type would typically include the following information: Blog Title, Author, Post Date, Post Content, and featured image. This will appear on the blog's landing page.
Blog Introduction	The Blog Introduction will appear at the top of FP's blog landing page. Typically describes the type of content found on the blog.
Custom Section Content	This is FP-written custom content intended to be used in a unique section of a webpage or site. This case type will appear when an FP creates a brand-new webpage for their site or modifies an existing page with new copy.

GUIDANCE FOR REVIEW BLOG ARTICLES:

- 1) Look for FMG disclosure language – if this is present then the material is pre-approved for use as FPs cannot access FMG-written blog material that has not been pre-approved.
- 2) Look for an AdTrax compliance code # with dates, it may, or may not, contain additional disclosure – if in doubt you can check the AdTrax system by searching for the code # on the piece.
- 3) If the blog article is generic (FP bio, announcement of new member, related to upcoming event, or similar) you can approve it locally.
- 4) If the blog article references, discusses, provides information about specific proprietary and/or non-proprietary products, services, investments or sales concepts; has statistical information, was created by an outside source (FPs cannot plagiarize appropriate credit must be given to the author); would be considered market or political commentary; is not fair and balanced; is not a fair and balanced discussion; provides an endorsement or makes a blanket recommendation; or anything you are unsure/uncomfortable reviewing – notify AdC by sending the case ID via email requesting it be reviewed by AdC.



Website Queue Guidance for Branch Controls Managers (Cont.)

GUIDANCE FOR CUSTOM CONTENT:

- 1) Any materials not obtained from the FMG pre-approved content library should be generic, such as biographical information related to members of, or the producer group itself, can be general announcements related to a new member, recent or upcoming event, or any other type of generic information.
- 2) Custom content That must be submitted to AdTrax for review/approval and contain a specific approval code with dates includes, but is not limited to, anything that:
 - a. Discusses, references, provides information about specific proprietary and/or non-proprietary products, services, investments, sales concepts;
 - b. Has statistical information that requires viable direct, current, sources that can be verified;
 - c. Created by a third-party that would require additional disclosures and confirmation it is not copyright protected. FPs must personally attest they, or a member of the producer group, curated the content, or the content must be credited to the actual author;
- 3) Items that should not be submitted via FMG or AdTrax would include, but is not limited to anything that:
 - a. Is not fair and balanced;
 - b. Is an endorsement by the FP, or recommendation by the FP, or the producer group;
 - c. Is market or political commentary.

Visual Workflow Diagram

Advisor created (new webpage or edits to an existing page)

