Call Recording FAQ

FAQ-CPL-ISO-099a

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	Agent Questions	Answers
Chain of Enrollment	1. What types of products within the chain of enrollment must be recorded?	MA, MAPD, PDP, OSB, & Group Medicare products are covered by the regulation.
Chain of Enrollment	2. What call types are considered part of the "chain of enrollment"?	The following calls with members and prospects are considered part of the chain of enrollment: Calling leads, scheduling appointments, collecting SOAs, educational calls/presentations, sales calls/presentations, collecting medication and pharmacy information, provider discussions, telephonic enrollments, and verification calls (calls made post enrollment to confirm understanding and intent to enroll). Note that this list is not all-inclusive and there may be other calls within the chain of enrollment that require recording.
Chain of Enrollment	3. What calls must be recorded?	Pre-enrollment Calls: Yes. Calls in the "chain of enrollment" are recorded if such conversations occur during the pre-enrollment process. Post-enrollment Calls: No. If such conversations occur during a post-enrollment (i.e. 3/30/60/90) call and do not move into a potential plan change or relate to a post-enrollment verification call, these do not need to be recorded.
Chain of Enrollment	4. What if I forget to record a chain of enrollment call?	As recording of the chain of enrollment is CMS required, the agent must take steps to ensure recording of all sales related calls (as defined herein). Agents should advise their leadership and Sales Integrity of these errors so that tracking of the recording process can occur.

Call Recording FAQ

FAQ-CPL-ISO-099a

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	Agent Questions	Answers
Chain of Enrollment	5. Do verification of enrollment calls have to be recorded?	Yes. Verification calls (that typically occur via warm transfer and are intended to affirm plan selection and beneficiary intent to enroll) must be recorded as these are considered part of the 'chain of enrollment".
Chain of Enrollment	6. Do calls pertaining to additional help on medication(s), providers, ID cards, and the like need to be recorded?	Pre-enrollment Calls: Yes Calls in the "chain of enrollment" are recorded if such conversations occur during the pre-enrollment process. Post-enrollment Calls: No. If such conversations occur during a post-enrollment (i.e. 3/30/60/90) call and do not move into a potential plan change or relate to a post-enrollment verification call, these do not need to be recorded.
Chain of Enrollment	7. Do calls discussing LIS/Dual process need to be recorded?	Pre-enrollment Calls: Yes Calls in the "chain of enrollment" are recorded if such conversations occur during the pre-enrollment process. Post-enrollment Calls: No. If such conversations occur during a post-enrollment (i.e. 3/30/60/90) call and do not move into a potential plan change or relate to a post-enrollment verification call, these do not need to be recorded.
Chain of Enrollment	8. What calls do not have to be recorded?	Post-enrollment: No Conversations occurring during a post-enrollment (i.e. 3/30/60/90) call and do not move into a potential plan change or are a post-enrollment verification call, do not need to be recorded.

FAQ-CPL-ISO-099a

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	Agent Questions	Answers
Customer Service	9. If a need to refer my member to Customer Service for assistance, do I need to record that call as well?	No. Customer service calls would not be considered part of the "chain of enrollment" and therefore do not need to be recorded by the agent.
Disclaimer	10. What is the disclaimer that needs to be read and when?	The 2023 CMS Final Rule includes a disclaimer that must be read by agents and agencies meeting the definition of a third-party marketing organization (TPMO), when selling plans on behalf of more than one MA organization unless the TPMO sells all commercially available MA plans in a given service area. This is separate from the call recording requirement. "We do not offer every plan available in your area. Any information we provide is limited to those plans we do offer in your area. Please contact Medicare.gov or 1-800-MEDICARE to get information on all your options." • Verbally conveyed within the first minute of a sales phone call. • Electronically conveyed when communicating sales related content with a beneficiary through email, online chat, or other electronic means of communication. • Prominently displayed on your website. • On all marketing materials, in print (12-point font) and television advertisements. Does not apply to career agents since they only represent Humana. Additionally, when a TPMO is conducting lead generating activities the CMS 2023 Final Rule provided the following disclosures:

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	Agent Questions	Answers
		• Disclose to the beneficiary that their information will be provided to a licensed agent for future contact. • Disclose to the beneficiary that they are being transferred to a licensed agent who can enroll them into a new plan.
Disclaimer	11. What if I forget to read the disclaimer within the first minute of the call?	See question #10 for guidance about agents who must read the disclaimer. Upon recognizing the disclaimer was not read within the first minute of the call as required by CMS, the agent would state the disclaimer and answer any beneficiary questions that may arise because of stating the disclaimer. Failure to comply with the CMS requirement moving forward may involve a corrective action plan to remediate any deficiencies that persist. The agent should contact Sales Integrity (salesintegrity@humana.com) to disclose this error. Please include the application ID, beneficiary information, time, and date of the call.
Disclaimer	12. What if I forget to include the disclaimer on a sales related email?	See question #10 for guidance about agents who must read the disclaimer. As inclusion of the disclaimer is required, the agent must take steps to include the disclaimer on all sales related emails moving forward. Failure to comply with the CMS requirement moving forward may involve a corrective action plan to remediate any deficiencies that persist.

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	Agent Questions	Answers
		The agent should contact Sales Integrity (salesintegrity@humana.com) to disclose this error. Please include a copy of the erroneous email when contacting Sales Integrity.
Disclaimer	13. Do I have to read the disclaimers or are they a suggestion?	See question #10 for guidance about agents who must read the disclaimer. The disclaimers are required and must be read as written by CMS on all "chain of enrollment" related calls.
Pharmacy	14. Does the CenterWell appointment process need to be recorded?	Enrollment transactions with sales agents must be recorded, including the selection of a PCP. If the sales agent performs a warm transfer to a provider group for the facilitation of appointment setting, then that component would not need to be recorded.
Plans	15. What if the agent sells a Humana PDP and another carrier for Med Supp? Will Humana hold the Med Supp information?	When the conversation moves to the enrollment of a non-Humana plan, the agent should stop the recording using the Humana recording service. The agent can resume the enrollment with a recording service of their preference.
Plans	16. Can I use the Humana call recording service when selling other carrier plans?	No. Partner or Brokerage agents should use their preferred recording technology and enrollment system for the other carrier.
Policy	17. Is this required for all agent types?	CMS's requirement applies to all agents. Agents are required to record calls with clients in the "chain of enrollment". Calls are already recorded for agents working in a call center.
Policy	18. Do I have to use the Humana call recording service?	Humana career agents must utilize the Humana call recording service. All other sales agents may use their preferred recording service and must ensure that they are able to produce the call recordings to Humana upon request.

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	**Agent Questions**	**Answers**
		Partner agents may use Humana's call recording technology for Humana-related sales calls and enrollments.
Policy	19. What if there are multiple calls with the same client before a decision and completing an enrollment?	Record each call with the client as part of the "chain of enrollment" as defined herein.
Policy	20. How long are "chain of enrollment" calls retained?	CMS' retention requirement is 10 years. Calls on the Humana recording service are retained by Humana. Partner agents using their own recording service would be responsible for retaining the recordings and must be able to provide the recordings to Humana upon request.
Policy	21. What are the call recordings used for?	Call recordings may be used by Humana for audits, call quality assurance, or complaint resolution purposes (if applicable). Call recordings may also be provided to CMS, upon their request.
Policy	22. Do I have to record face-to-face meetings?	No. Face-to-face meetings do not need to be recorded.
Policy	23. If I am using Zoom/Webex as part of a "chain of enrollment" call, do I have to record it?	Updated 10/5/22 Yes; all video calls such as Zoom, or Webex must be recorded per CMS, regardless of the scenario of the prospect/member/agent camera availability

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	**Agent Questions**	**Answers**
Policy	24. Do I have to record Member Care Assessment calls?	No.
Policy	25. Do I have to record campaign calls? (ProducerAMS, CART)	Yes, these must be recorded. Additional recording information will be shared as call campaigns are launched.
Policy	26. What if my client does not want to be recorded?	Inform the member that the call is recorded per CMS requirements. Schedule an in-person appointment if the client objects.
Recording	27. How do I use the recording?	Refer to the Job Aid.
Recording	28. My SAN was not recognized on the recording service? What do I do next?	If the SAN you entered was not found, please contact 1-800-309-3163 for Assistance. If the agent is Licensed, Appointed, Certified, the file may not be updated yet. You may try again in 2 days to allow the file to be refreshed.
Recording	29. What do I do if I do not know my SAN number?	If the SAN you entered was not found, please contact 1-800-309-3163 for Assistance.
Recording	30. Inbound Calls How do I record an inbound call from the client?	The agent must start the call recording when they recognize the call falls within the "chain of enrollment". Refer to the Job Aid for details of recording these calls.
Recording	31. Inbound Calls What if the client calls me about something else and the conversation turns into a "chain of enrollment" call? How do I record it?	The agent must start the call recording when they recognize the call falls within the "chain of enrollment".

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	**Agent Questions**	**Answers**
Recording	32. Is there a way to connect to the call recording service directly from Humana enrollment tools?	Not at this time.
Recording	33. Can I use Humana's recording service for the pre-sale calls and switch to Sunfire for the enrollment with recording service?	Yes, this would be permitted for partner agents who utilize Sunfire technology for multi-carrier enrollment options.
Operations	34. How will I know if the recording is in progress or if the call drops?	Agent will hear a tone when the recording starts. If an enrollment, the agent will have a Tsig confirmation.
Operations	35. If the call drops, can I retrieve the call or should I start over?	No. The recording cannot be retrieved. The agent should re-start the call when recognizing that the recording dropped.
Operations	36. If for some reason I get to the enrollment and try to connect to the T-sig, if it does not connect what happens next?	Agent verbally reads the T-Signature language to the client on the recorded call.
Operations	37. Is the recording available in Spanish? Or other languages?	Yes, the recording is available in Spanish. Translator service should be used for other languages.
Policy	38. When do I need to start recording calls?	CMS' call recording requirement applies to all enrollments effective 1/1/2023. Sales agents must ensure they are adhering to the requirement beginning 10/1/2022 for all 1/1/2023 enrollments.
Operations	39. Can I get my recordings from Humana?	No. Call recordings are held by Humana for quality assurance and training purposes.

FAQ-CPL-ISO-099a

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	**Agent Questions**	**Answers**
Questions Added 10/7/22		
Operations	40. Do I need to hang up the phone after each member and begin a new recording for the next phone call?	Yes. Agents must start a new recording for calls to each client. Agents must hang up the call recording when the call with the client is complete. Then, the agent sets up a new call recording for the next client phone call.
Operations	41. May office support staff/third party representative call clients to schedule/reschedule an appointment or talk to a caller? May my support staff use my SAN with the call recording service?	Yes. Office support staff/third party representatives may use the agent's SAN with the call recording service related to appointment scheduling or talk with a prospective/member. Best Practice: The support staff member should introduce themselves and the agent they are calling on behalf of. Reminder: Only licensed agents may speak to members or prospects about Medicare plan details.
Recording	42. What does the caller ID display when an agent calls a member from the recorded line?	The agent's original phone number shows up on caller ID when dialing out using the call recording service.
Operations	43. Will sales leaders have monitoring ability?	Yes; reporting and monitoring processes are still under development at this time. Additionally, after AEP, Humana will start designing further monitoring processes to assess an agent's usage of the tool and provide insights to agent leaders.
Operations	44. How will the leader/MSA/agent be able to follow up or listen to calls after the fact?	Sales Integrity has an oversight process to obtain and listen to calls. The market management team will be engaged when agent education is needed, or an allegation is involved.

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	Agent Questions	Answers
Recording	45. While on XOA, will agents need to dial in to the Call Recording line?	No. XOA agents will use the normal processes that include call recording through Avaya.
Recording	46. Will the recording end when the beneficiary hangs up?	The recording line will not disconnect when the client hangs up. The recorded line disconnects when the agent terminates the call.
Recording	47. When a client hangs up, may I use the same recording to call another client?	No. Each call to a client must be on a different recording. The client's phone number entered when starting the recording allows the call to be located later, if needed.
Operations	48. Will a translated job aid be available?	A Spanish version of the job aids/FAQ/trainings will be available before AEP begins on 10/15/2022.
Disclaimer	49. Is the disclaimer at the beginning of the recording a statement, not a question?	Yes. The recording notification to the beneficiary is a statement from the agent. The verbiage and scripting reference is within the training job aid. See Question #10
Operations	50. If an agent facilitates a call in a language other than English or Spanish, what is the process?	At this time, the recording service prompts are only in English or Spanish. The agent may call a translator service to provide translations into a language other than English or Spanish. If the agent is certified to sell in another language, they can continue with the recording, even if the prompts are in English. The service will record all conversations, no matter the language.
Disclaimer	51. Are business cards considered marketing materials and must include the disclaimer	No business cards are not considered marketing material.

Call Recording FAQ

FAQ-CPL-ISO-099a

NOTE: The responses contained herein are based on Humana's interpretation of the TPMO guidance. This document may be subject to change should CMS provide further expectations or clarity as pertains to the new call recording requirement.

Topic	Agent Questions	Answers
Operations	52. May I use FaceTime to call clients?	No. FaceTime is not an accepted business practice.
Operations	53. What are my compliant options for securing a SOA by phone?	You may use the SOA IVR along with call recording.
Operations	54. If you have a husband and wife, and are doing call recording, do you have to record two separate calls or can you do one call while both are on speakerphone?	In this scenario 2 separate calls are required.
Policy	55. Do I have to record calls for clients in rolling in PY2022 as well was PY2023?	Yes. Call recording is needed for calls within the "chain of enrollment" beginning 10/1/22, for 2023 plan year.