



# CMS Call Recording Compliance Checklist

The CMS Final Rule for 2023 has made call recording compliance for Medicare Advantage and Part D plans much more stringent. Coupled with ongoing and comprehensive member privacy and health data security, health plans must have future-proof solutions to support their compliance.

In this new climate, you and any of your third-party health plan marketing associates must have the right technology, security, and protocols in place to meet regulations for call recording and longterm and secure storage.

Keeping track of the things you need to do to keep call recordings safe and compliant may seem overwhelming. Use this checklist to assess your compliance efforts.



## Compliance checklist

- Establish organized recording and storage processes**  
Create a consistent, established process for recording and storing calls. This requirement covers any creation, receipt, transmission or storage of an interaction. These processes prioritize safe handling of protected health information. A robust communications system designed with set processes for secure communication recording, storage, and retrieval is a significant advantage in meeting this compliance requirement.
  
- Use the right disclaimers**  
Create and distribute to your agents a standard script that meets the current CMS requirements.

**Train agents thoroughly**

Given the risks of compliance failure, train all involved employees on processes and security for call recording and storage. Train agents to use an approved script that includes appropriate disclaimers in live calls and electronic communications like email, chat, and instant messaging.

**Route calls correctly**

This may seem like a no-brainer, but it is important to ensure that calls are routed to agents who have been appropriately trained on internal compliance processes. Failure to do so may result in non-compliant communications and the penalties that go with them.

**Secure your data**

Call recordings and other sensitive data must be protected and stored securely. Look for a communications platform that offers end-to-end encryption regardless of location or device.

**Beef up your remote technology policy**

With many providers now operating with remote or hybrid workers, it is important to develop or review a remote tech policy. This policy establishes safety procedures for employees working from home or another off-site location.

**Build and implement internal and external review processes**

Establish processes for auditing compliance by employees and third-party associates. Self-monitoring allows you to identify potential compliance risks so you can make preventative adjustments to systems and processes, address issues with associates, and provide any necessary retraining.

It is also essential that your recordings are easily retrievable in the event of a compliance review request. For this reason, a well-designed communications platform should have an integrated process for structured and organized recorded call storage. You can quickly identify requested calls and deliver them to the requesting agency with the appropriate technology in place.

## Let Global CTI power your compliant communications

Meeting compliance requirements for call recordings isn't just a matter of pleasing regulatory bodies, the Centers for Medicare & Medicaid Services (CMS), or other oversight agencies. Well-established processes, effective training and a HITRUST CSF certified cloud communications platform protects member privacy and health information from the expensive consequences of a security breach and data theft.

RingCentral's all-in-one communications platform allows you to easily record interactions across all common channels, with an organized structure for easy retrieval upon review requests. It also features advanced security measures like two-factor authentication and end-to-end encryption to safeguard the protected health information of your clients.

Global CTI streamlines the steps and requirements for recording compliance and security to let your health plan put member engagement first. [See how cloud communications can transform your payer organization.](#)



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