

Record Retention

CMS requires all documents to be retain for a minimum of ten years.

- **Prior to hire monthly exclusion checks.**

Evidence of screen shots for OIG showing employee name and date checked. **Evidence** for the GSA is the pdf showing the employee checked. Make sure it is evident that the printout or pdf reflects the database you are referencing (OIG or GSA, both are required) and includes the date checked (reflected just below the name on OIG and at bottom of page on the GSA) Evidence must be retained for ten years.

- **New hire and annual training**

Be sure that your new employees complete the CMS FW&A and General Compliance Training (from the CMS website) within 90 calendar days of hire and annually thereafter. New hire an annual training must include a code of conduct from one of the carriers. (available on the carrier agent portals) Or you may use your own code of conduct if it is equivalent to the carrier requirements.

Be sure to have the employee sign and date a training acknowledgement form when completed. The acknowledgement form and the two CMS certificates must be retained for 10 year

WHO MUST BE CHECKED AND COMPLETE THE ABOVE TRAININGS?

- *Any non- agent employee, contractor or vendor who has access to PHI of Healthcare members. Additionally, all senior leadership, principals and owners of the organization's Medicare Advantage business.*

Also retain:

All call scripts pertaining to Medicare products

All recorded phone calls

All enrollments and the scope of appointment

All Marketing Material pertaining to Medicare products

All pertinent materials/documents pertaining to Medicare business including but not limited to the above should be retained