Medicare TPMO call checklist

For agencies, FMOs and call centers selling Medicare Advantage and Part D by phone. Updated for the CY2027 rule changes that took effect October 1, 2026.

Before the call

- [ ] Scope of appointment agreed with the beneficiary and recorded before the appointment. It's valid for 12 months.
- [ ] Products you'll discuss are inside that scope. Another health-related line of business needs its own scope of appointment.
- [ ] No non-health products (annuities, for example) on a Medicare marketing appointment.
- [ ] The number of organizations and plans you represent in the beneficiary's area is current, because the disclaimer says it out loud.
- [ ] TCPA basics: consent on file for the lead, National and internal DNC scrubbed, calling hours by the beneficiary's state.

On the call

- [ ] The TPMO disclaimer is spoken before any benefits are discussed. Under the old rule it had to land in the first minute; now it has to come before the first benefit.
- [ ] Disclaimer wording: "We do not offer every plan available in your area" (leave this sentence out only if you sell for every organization in the area), the number of organizations and plans you represent there, and Medicare.gov or 1-800-MEDICARE for all their options.
- [ ] The agent says when enrollment starts ("you're now completing an enrollment request"). CMS treats the recording from that point as the enrollment form.
- [ ] Agents stay on the approved script, and only discuss products inside the scope.

Recording and retention

- [ ] Every marketing and sales call recorded in its entirety, including the audio of web-based calls.
- [ ] Kept at least 6 years: audio for years 1 to 3, audio or a complete and accurate transcript for years 4 to 6.
- [ ] The enrollment portion kept for the current contract period plus 10 prior periods. Don't purge whole calls on a 6-year schedule.
- [ ] Recordings findable by beneficiary, phone number and date, ready when a carrier or CMS asks after a complaint.

QA every week

- [ ] Check the disclaimer came before the first benefit on the calls you review, not just that it was said.
- [ ] Check the products discussed matched the scope of appointment.
- [ ] Review every call that led to a complaint, a cancellation or a rapid disenrollment.
- [ ] Coach any agent who misses the disclaimer order, then re-check their next calls.

Klariqo connects to VICIdial and turns every recorded call into a Klariqo Call Record: the full transcript, a digital signature and an independent timestamp, checkable at verify.klariqo.com. Add the disclaimer-order check to your Call QA scorecard and every call gets checked for it. Your first 10,000 recorded calls are free: app.klariqo.com/onboarding