

CMS Updates



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Updated Guidelines – May 9th, 2022

- Heavy increase in complaints to Medicare from AEP 2021 to AEP 2022 – up from 15,497 to 39,617 this past AEP
- Initial CMS memo issued on 10/8
- Updated CMS Medicare Marketing Guidelines released by CMS in March
- Final ruling released on 5/9

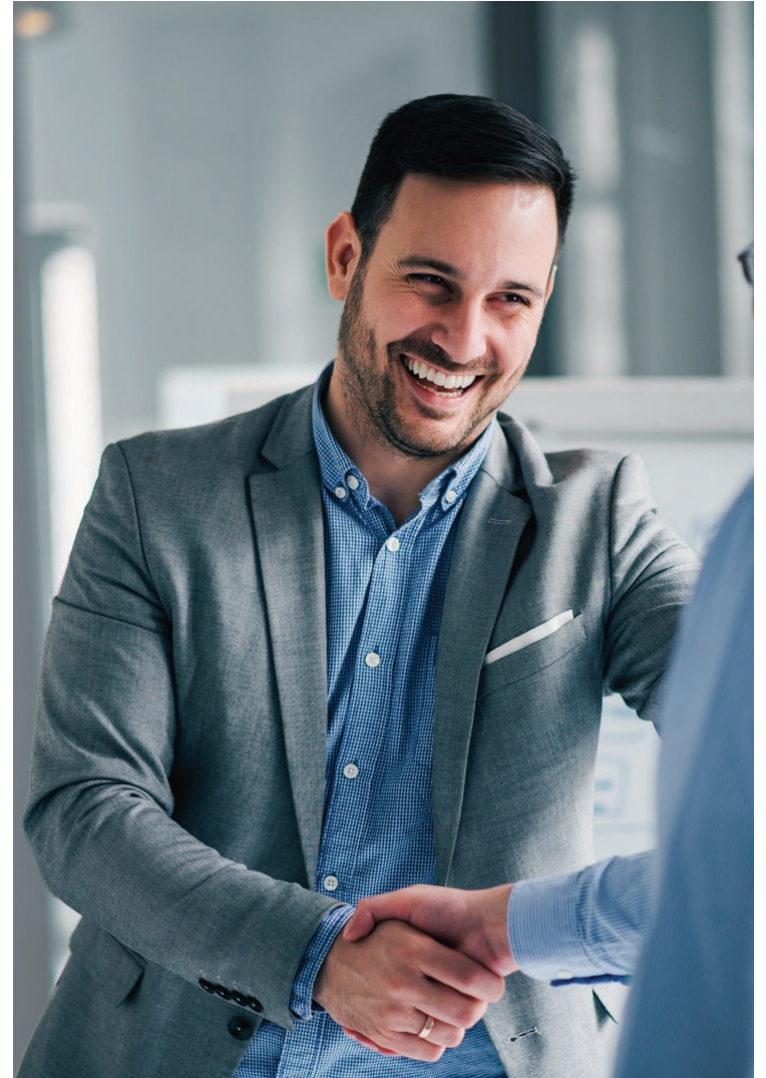


CMS Updates

New Requirements – TPMO

CMS broadened the definition of TPMO (Third-Party Marketing Organization) to include all:

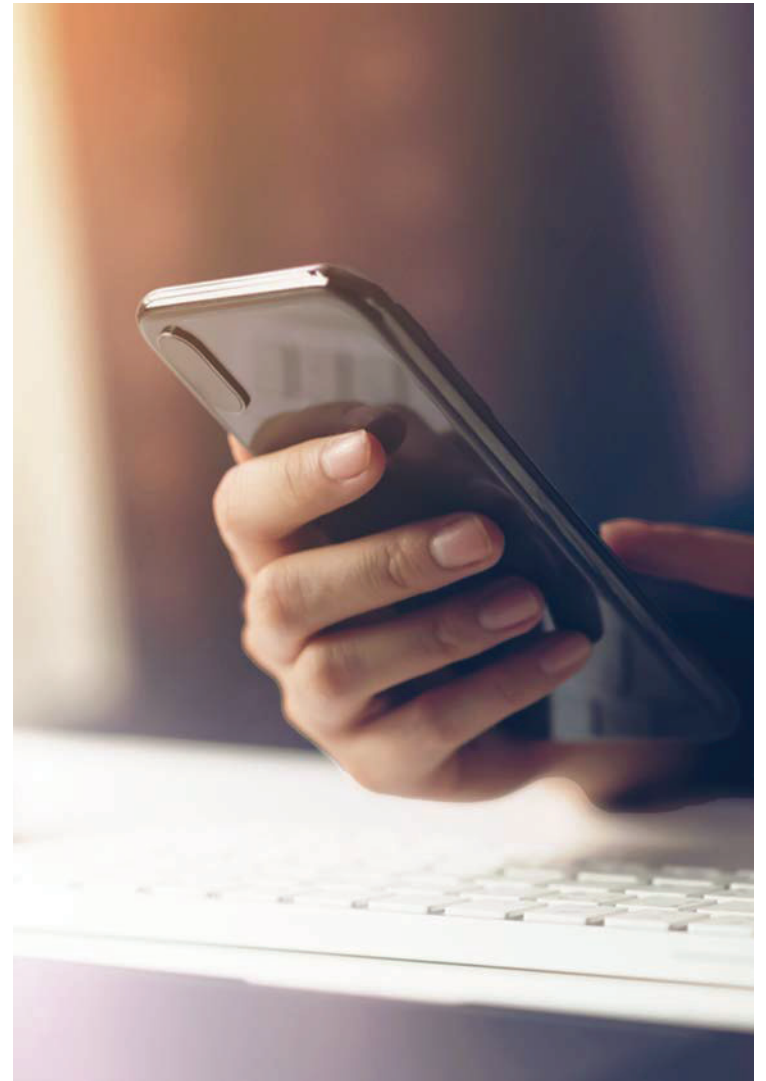
- NMOs
- FMOs
- Agencies
- Brokerages
- Independent agents



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New Requirements – Call Recordings

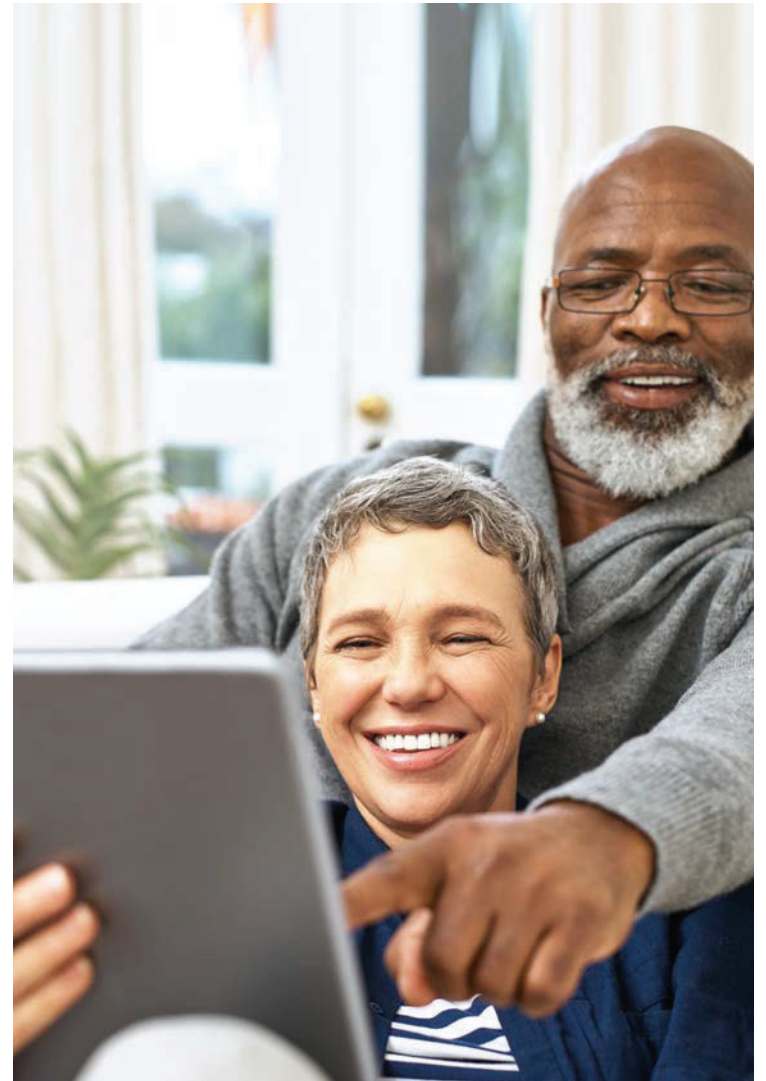
- Recording of all phone interactions between agents and consumers for their entirety
- Downloadable call recordings provided to CMS upon request
- Additional disclaimer language present at the beginning of each call interaction (within the first minute of sales calls)



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New Requirements – Marketing

- CMS clarified definition of marketing in such a way that broadens some marketing entities previous definitions
- Additional disclaimer required on all marketing materials, including inbound websites, emails and other online chats
- Expanded process for third-party submission of multiplan marketing materials to CMS through HPMS Marketing Module



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New Requirements – Timing

All new requirements **MUST** be in place for January 1, 2023 effectives

