CMS 2027 Call Recording Checklist for Agents Who Sell by Phone

Ten questions to check before an auditor or carrier asks. Any answer of "no" or "not sure" is where your gap is.

> **The rule in brief**
>
> Phone calls that result in a Medicare Advantage or Part D enrollment must be recorded. Sales and marketing calls are kept for 6 years (audio for 3 years, then audio or a complete transcript for years 4 to 6). Enrollment records are kept for 10 years. The TPMO disclaimer is given before plan benefits are discussed. If a beneficiary refuses recording, the call ends.

1 Who and which phones

- [ ] We know which agents take or make enrollment calls by phone. Yes / No / Not sure
- [ ] We know which of those calls happen on agents' cell phones. Yes / No / Not sure

2 Capture

- [ ] Calls from the phone's normal dialer are recorded. Yes / No / Not sure
- [ ] When a client calls an agent's cell directly, the call is recorded. Yes / No / Not sure
- [ ] Personal calls are kept separate, so only business calls are recorded. Yes / No / Not sure

3 Scripts and consent

- [ ] The TPMO disclaimer is given before plan benefits are discussed. Yes / No / Not sure
- [ ] Agents know to end the call if the beneficiary refuses recording. Yes / No / Not sure

4 Storage and retrieval

- [ ] Our retention policy matches the 2027 rule: 6 years for sales calls, 10 years for enrollment records. Yes / No / Not sure
- [ ] We can find one specific recording within minutes when a carrier asks. Yes / No / Not sure
- [ ] Each recording is linked to the client's record in our CRM. Yes / No / Not sure

General information, not legal advice. Confirm requirements with your FMO, carriers and compliance advisor. Full guide with sources: mobile2crm.com/cms-call-recording-medicare-agents-cell-phone

Mobile2CRM gives each agent a recorded US business line as an eSIM on their own phone, on the AT&T and Verizon networks. Nothing to install, every call logged to your CRM. Free 14-day trial: **mobile2crm.com/us-esim**