

**Document Name:**

**Policy on Telephonic Sales Presentations by Field Sales Agents**

**Business Units:**

Humana/CarePlus Career  
External Agents

**Version Date:**

10/11/2019

**Business Owner/Approver:**

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**Document History:**

Date Created	10/15/2015
Date Revised	08/24/2016
Date Revised	10/26/2017
Date Revised	07/10/2018
Date Reviewed	10/11/2019

## Purpose

The purpose of this policy is to outline the acceptable guidelines and procedures an agent must follow when a prospective or current member elects to discuss plan options telephonically rather than in an in-person meeting with a sales agent. In those instances, a licensed, appointed and certified sales agent representing a Humana Medicare Advantage (MA) or Prescription Drug Plan (PDP) plan *in a non-call center setting* would be required to follow the process outlined below to perform a compliant telephonic Medicare sales presentation. The acceptable methods of enrollment after a telephonic presentation is given are outlined as well. This policy excludes hybrid agents as they are trained to conduct sales both in a field setting and a call-center setting.

## Policy and Procedure

It is Humana's policy that sales presentations involving field sales agents occur primarily as face-to-face encounters with the beneficiary whenever possible. When a face-to-face presentation is not feasible or not desired by the beneficiary, the sales agent may conduct a telephonic sales presentation, with the beneficiary's permission. Please note that at this time sales leadership has approved career agents to conduct telephonic presentations in the following scenarios:

1. An existing member is interested in making a plan-to-plan change and the member prefers a telephonic presentation.
2. The agent previously met face-to-face with a prospect but they weren't ready to commit to enrolling at that time. The agent may then use the telephonic presentation at a later date if the prospect decides they are now interested in enrolling in a plan.

Certain circumstances may arise that would allow sales leadership to extend permission for career agents to conduct telephonic presentations with prospective members on a case by case basis (e.g. inclement weather).

Sales agents representing Humana MA and PDP plans are required to give a full and compliant sales presentation to beneficiaries or a beneficiaries' legal representative prior to enrolling them into a plan, regardless of the sales presentation method. Here are the telephonic presentation guidelines an agent must follow:

1. Complete a Scope of Appointment (SOA).
  - a. An SOA must be completed for all individual marketing appointments, including telephonic sales presentations. If additional health products are to be discussed at an MA/PDP appointment, those products must also be included on the SOA.

2. Have express written permission to telephonically contact the beneficiary about MA and/or PDP plans.
  - a. When contacting a beneficiary by telephone to establish a new relationship the beneficiary must give express written permission for the contact (e.g. by filling out a business reply card or sending an e-mail requesting such contact). Consent for future contact must be limited in scope, short-term and event-specific. In all cases, the agent is personally obligated to maintain the record of permission to contact the beneficiary or legal representative as documented proof of permission. All records pertaining to a Medicare enrollment must be kept for a period of 10 years and be made available upon request from Humana. If an agent is contacting a current client, written consent to contact is not required to discuss normal plan business. Agents must follow all Telephonic Consumer Protection Act (TCPA) guidelines.

**NOTE:** Contacting beneficiaries who have inquired about Medicare Supplement insurance **does not** permit an agent to market MA and/or PDP during the appointment. Beneficiaries **MUST** inquire specifically about MA/PDP and subsequently the agent must document this inquiry via an SOA for the plan type(s) to be discussed.

3. Send all required sales materials **prior** to the telephonic presentation.
  - a. Sales agents must send (e.g. through mail or email) ALL required sales materials to the beneficiary prior to the presentation. See the [Required Materials](#) section of the policy for a list of the required materials.
  - b. Emailing documents to the prospect is permitted **ONLY** with the beneficiaries' permission.
  - c. Sales agents are advised to maintain a record of all documents mailed, the date they were mailed and/or any applicable postage receipts as proof in the event of an investigation.
  - d. For appointments where the materials are sent electronically (through email or the Digital Marketing Materials link), the agent must retain a copy of all email correspondence as proof that all required materials were sent. The Digital Marketing Materials tool is the preferred method for sending materials electronically as the system automatically tracks this information for the agent.
4. Conduct a full and compliant sales presentation.
  - a. During the appointment call, sales agents must conduct the sales presentation in its entirety and fully review all CMS required documentation with the beneficiary to ensure full comprehension on the part of the beneficiary. This includes following the Humana approved Sales Presentation as it serves as a CMS approved telephonic sales script. Use of a CMS approved script is required for telephonic sales presentations of all kinds.

## Required Materials

The following materials must be provided to all potential enrollees who have agreed to participate in a telephonic sales presentation, and must be reviewed in their entirety during the telephonic presentation:

1. Humana All-in-One Enrollment Book; which includes:
  - Summary of Benefits
  - Non-discrimination notice and multi-language insert
  - Star Ratings Sheet

- Prescription Drug Guide, if applicable
2. Link to Humana Sales Presentation (“Sales Presentation”) video if prospect has indicated they can access internet to view. This is OPTIONAL - current Humana members may opt not to review the video. If member opts out of watching the video, make sure to read required disclaimers (see CPL-006).
  3. In cases where the member cannot view the video, agents should provide an emailed PDF copy of the Sales Presentation (for those who have agreed to receive materials via email), or a printed copy of the Sales Presentation.
  4. For those beneficiaries who either do not wish to receive materials electronically or do not have the ability to view the video online, agents are to verbally go through the talking points of the approved Sales Presentation to ensure the beneficiary has been advised of all important compliance topics addressed therein.

### Acceptable Enrollment Methods

Agents may utilize the following enrollment methods resulting from a telephonic sales presentation:

1. FastApp/E-sig – Agents may fill out an application using the FastApp tool and then send the beneficiary an e-signature request. The email MUST be sent to the beneficiary / legal representative, and in no cases can it be sent to an agent’s/agency email address for signature. A member will have to call the agent back for this process to be utilized. This method is available as of October 15<sup>th</sup>.
2. Paper application mailed to the beneficiary prior to the appointment – Agent can pre-populate their name and SAN on the application prior to mailing the sales kit to the beneficiary, but must not put a date by their (agent’s) name as that constitutes a “receipt date” by the plan. It is recommended that an agent use a package delivery service (i.e. UPS, FedEx, etc.) in order to track and confirm receipt by the Beneficiary.
3. The beneficiary can self-enroll by clicking the “Enroll Now” button on the Digital Marketing Materials link.
4. Agents who’ve completed the mandatory training on Agent Online Application (AOA) may send the beneficiary the AOA link after receiving an email from the enrollee confirming that they would like the agent to send the link. IMPORTANT NOTE: Agents may NOT complete the enrollment on behalf of someone else using this tool. This link is designed for self-enrollment only.

### Monitoring and Oversight

Routine monitoring is considered part of Humana best practices. If a complaint arises as part of our investigative processes and involves a telephonic presentation, the agent will be expected to produce:

- Proof of permission to contact, if applicable
- Scope of Appointment
- Proof that all applicable correspondence and required documentation were provided to the beneficiary prior to the appointment

## Disciplinary Standards

Failure to comply with the requirements stated in this policy and procedure may subject an agent (and/or their representative agency) to corrective actions that could lead to and include termination of their employment/contract with Humana.

## Related Links

[CPL-026a Telephonic Presentation Job Aid](#)

[CPL-006 Policy on Required Marketing Materials and Disclaimers](#)

[CPL-010 Policy on TCPA Compliance](#)

[CPL-021 Policy on Scope of Appointment](#)

[CPL-043 Policy on Obtaining Permission to Contact](#)