

CMS Record Retention Requirements

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I. DEFINITIONS

Term	Definition
MA	Medicare Advantage
PDP	Prescription Drug Plan
HIPAA	Health Insurance Portability and Accountability Act
CRM	Customer Relationship Management system, database
CMS	Centers for Medicare and Medicaid Services
Carrier	Insurance Company, or Plan Sponsor as defined by CMS

II. PURPOSE

The purpose of this policy is to ensure that record retention requirements are being met in accordance with CMS and carrier requirements.

III. POLICY

Medicare Advantage Specialists will retain all documents related to the sale of MA and PDP products for a minimum of ten (10) years. Additionally, all such documents, including hard copy and electronic, will be stored securely in accordance with HIPAA regulations. Documents subject to ten-year file retention include:

- Training material and related attestations and test results
- Background checks
- OIG/GSA exclusion database search results (pre-hire and monthly)
- Complaints and disciplinary actions
- Contracting documentation
- Audit records
- Documents related to the marketing or sale of MA and PDP products, including enrollment forms, Scope of Appointment forms, Business Reply Cards, etc.

IV. PROCEDURE

Documents related to the sale of MA and PDP products are generally received in electronic form via secure means. Once received, the documents are processed within the workflow interface of our internal CRM, which is secured using appropriate encryption and firewalls (see “Handling Confidential Information Policy” and “Data Protection Policy”). These documents are then attached to the applicable agent or client profile within the CRM for storage and future reference. Medicare Advantage Specialists will provide carriers with information housed in our systems as requested. This information may include demographic or contracting information of agents.

V. DISCIPLINARY ACTION / SANCTIONS

Those who violate this policy are subject to discipline up to and including termination in accordance with the Medicare Advantage Specialists Sanctions and Disciplinary Action Policy.