2018 AEP Scope of Appointment (SOA) Frequently Asked Questions

Is the Scope of Appointment Process Changing again this year?
Yes. In the 2018 MMG, CMS has made a couple of significant changes to the Scope of Appointment requirements. You must still obtain an SOA prior to the appointment; however, you are now no longer required to obtain the SOA 48 hours prior to the appointment when practicable. In addition, the requirement to document why a SOA was not collected at least 48 hours prior to the appointment was removed.

Do I still need to collect a Scope of Appointment (SOA)?
Yes. While CMS relaxed the rules around the timing of collecting a SOA, a SOA is still required prior to the appointment for all in-person or telephonic appointments when presenting a MA, MAPD or PDP plan.

Are there any other significant changes?
No. The pre and post appointment processes are still required of the agent and are designed to ensure a complete Scope of Appointment form that meets CMS expectations. The additional fields assist in programmatically matching Scope of Appointment forms to Enrollment Applications, and enhanced web functionality to make it easier for agents to update and complete the Scope of Appointment.

Who needs a Scope of Appointment?
A Scope of Appointment is required for any individual in-person or telephonic marketing appointment with an agent. It should be signed by the beneficiary prior to the scheduled appointment time, prior to the sales presentation in the case of a beneficiary walking in, or prior to discussing any products not agreed upon in the original SOA.

Do I need a Scope of Appointment for beneficiaries attending a Formal or Informal event?
No. Beneficiaries attending a formal or informal sales event do not need to complete a Scope of Appointment. The scope of the marketing/presentation is implied in the event promotion.

What if I set a future appointment with a beneficiary at a formal or informal event?
If a beneficiary attends a formal or informal event and wishes to schedule a future individual appointment with the agent, the agent must secure a Scope of Appointment prior to the appointment following normal Scope of Appointment guidance.

Do I still need to collect the SOA 48 hours prior to the appointment?
No. Agents can complete the SOA at any time prior to the appointment up to and including immediately prior.

Do I still need to document that the SOA was collected inside 48 hours prior to the appointment?
No. CMS has removed the requirement that the SOA has a field to document why a SOA was collected inside 48 hours prior to the appointment.

Are all methods of collecting an SOA still available for agents in the field?
Yes. A SOA can be collected via Paper, IVR and MAPA.

Does the SOA and Enrollment method have to match?
No. An agent can use any combination or methods. Paper SOA and MAPA enrollment, IVR SOA and paper enrollment, etc…

Are the Paper, IVR, and MAPA SOA's being updated to reflect the new guidance?
No. Due to the late publication of the SOA guidance, current SOA processes are not being updated; however process workarounds are being communicated so that agents can be in compliance with the new guidance while using existing SOA processes.

How do I complete a Paper SOA under the new guidance?
When completing a paper SOA, write N/A in the field that reads *"Agents, if the form was signed by the beneficiary at time of appointment, provide explanation why SOA was not documented prior to meeting:"* field.

How do I complete an IVR SOA under the new guidance?
Agents can three way call into the IVR with the member and follow the prompts. The IVR phone numbers are:

Career	1-800-903-5493
Delegated	1-866-945-4471
Affinity	1-866-945-4470
CarePlus	1-888-685-8606

When completing an IVR SOA, when the question is asked "…is this SOA being taken immediately before or during the appointment…" always answer No by pressing 2 when asked.

How do I complete a MAPA SOA under the new guidance?
There is logic behind the SOA date field in MAPA that cannot be removed prior to the AEP. Therefore if you enter a SOA date that is the same day as the appointment you will be given a pop up box that requires an entry prior to proceeding. When the pop up box presents itself, just enter "New SOA" and continue on with the MAPA SOA workflow.

I am presenting a MA/MAPD/PDP plan over the phone, do I need a SOA?
Yes, a SOA is still required prior to the appointment for all telephonic appointments when presenting a MA, MAPD or PDP plan.

Why are there Pre- and Post-Appointment sections of the SOA?

There are fields on the SOA that can only be answered after the sales appointment is completed. These include Application #, Date Appointment Completed; Plan(s) the Agent Represented, and Beneficiary Medicare ID Number. These fields should be completed once the sales appointment is completed and will be dependent on whether a sale was made or not.

Can I make copies of a paper SOA?

No, paper SOA's are barcoded for identification purposes. These barcodes allow us to easily match the SOA to the application.

What is the barcode for?

The barcode will be scanned and processed by our application vendor. This will allow us to easily match an enrollment application to a Scope of Appointment form.

How do I order Scope of Appointment Forms?

Due to the barcode, each SOA form is unique; therefore the form cannot be copied or reused. All SOA forms must be ordered through the Order Management System

Do agents have to use the Humana SOA Process and Form?

Humana highly recommends agents use a Humana Scope of Appointment form. Per CMS, the forms must be maintained and retrievable for 10 years. When a Humana SOA is used, Humana accepts the responsibility of that maintenance. While Humana has worked hard to develop an agent friendly process, agents can use a CMS approved SOA form from another source. Agents who use a "GENERIC" non-Humana SOA form must be able to produce the document upon request and retain copies for 10 years per CMS record retention policies.

Are SOA forms available in other languages?

The Humana SOA process is only designed and approved for Standard English and Spanish SOA forms. However; Humana has developed SOA forms in other languages. Agents who opt to use a non-standard SOA are subject to the same retention requirements as if using any other generic SOA form.

What if I use a Generic SOA form?

Humana recognizes that agents may use a SOA from another carrier or one developed specifically for an FMO. In these cases, the agent would enter "GENERIC" in the SOAID field on the application, and submit the form along with the application. Since the form is non-standard it cannot be processed and keyed by Humana, therefore the agent is responsible for the 10 year retention requirement.

If I can use any combination of methods, how will enrollments be matched to Scopes of Appointment?

Each Scope of Appointment method and each enrollment method has a unique number.

SOA Method	Unique SOA Number	Enrollment Method	Unique Enrollment Number
Paper SOA	Barcode Number	Paper Enrollment Form	Barcode Number
MAPA SOA	MAPA Form ID Number	MAPA Enrollment Application	MAPA App ID Number
IVR SOA	Recording ID Number	FASTApp	FastApp ID Number
DMS SOA	Recording ID Number		

Agents will be asked to enter the Unique Enrollment Number from the enrollment form into the "Application #" field on the Scope of Appointment form and enter the Unique SOA Number from the Scope of Appointment into the Scope of Appointment ID Number field of the Enrollment Application.

What do I write in "Application Type" found on the paper Enrollment application?

The application type is now part of all enrollment methods. The application type allows us to determine whether an application resulted from an appointment that required a Scope of Appointment. Agents must enter a 3 character code when completing the application. The code will allow us to accurately demonstrate our agents are completing SOA's for those applications requiring them. We will also use the code with reporting, monitoring and oversight of the SOA process.

Scope of Appointment Type Codes		
CODE	Description	SOA Required
INH	In-Home Appointment	Y
F2F	Face to Face Appointment Outside of the Home	Y
SEM	Advertised Seminar	N
GCW	Guidance Center Walk-In	Y
GCS	Guidance Center Advertised Seminar	N
WAL	Walmart*	N
RET	Other Retail Partner*	N
TEL	Telephonic Presentation	Y
OTH	Other	Y

***A SOA for an informal event is not required only when the scheduled hours at the Retail location are reported to Humana as an Informal Sales Event.**

What do you mean by Plans Represented?

These are different plans discussed during the appointment, Humana, United, WellCare, etc…

Do I get the Beneficiary Medicare ID number if no sale was made?

No, we only need the Beneficiary ID number if they decide to join a Humana plan.

How do I update an IVR SOA or a paper SOA if I already mailed it in?

Agents can update the Scope of Appointments on the Medicare Sales Reporting the online tools available through the agent portal for all agents and in MAPA for MAPA users.

How do I submit a Scope of Appointment?

MAPA SOA's are uploaded with the enrollment applications. Humana paper Scope of Appointment forms can be faxed to 877-889-9936 or mailed to the address on the form:

Humana MarketPoint
PO Box 14637
Lexington, KY 40512-4637

Can I fax a Scope of Appointment and Enrollment Application together?

Yes, however, the application vendor will separate them and treat them as two separate documents.

Will there be Scope of Appointment Monitoring and Oversight?

Yes, the MarketPoint Sales Integrity Department will conduct routine monitoring of agent's compliance with the SOA process. Agents found not completing SOA's or are unable to produce a SOA upon request will be subject to disciplinary actions, up to and including termination.

What if I had a paper, IVR or MAPA SOA and the beneficiary wants to discuss an additional health product during the appointment?

Then you must execute a new Paper, IVR or MAPA SOA with the original products selected as well as any new non-MA/PDP health products.

What if I had a DMS Lead SOA and the beneficiary wants to discuss an additional health product during the appointment?

You will need to verify what products were previously agreed upon by the beneficiary, then, execute a new Paper, IVR or MAPA SOA with the original products selected as well as any new non-MA/PDP health products.

What if I have a SOA prior to the appointment and I bring up additional products I think would be appropriate for the beneficiary and want to discuss these products during the appointment?

If it is not practicable and the beneficiary requests to discuss other products, then you must execute a new Paper or MAPA SOA with the original products selected as well as any new non-MA/PDP health products.

Is an SOA needed if we plan on discussing only non-MA/PDP health products?

No. An SOA is only required by CMS for MA and/or PDP appointments.

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Purpose

The purpose of this policy is to address scope of appointment guidelines as it relates to personal/individual marketing appointments and when beneficiaries walk-in to an agent/broker's office. Per Section 70 in Chapter 3 - Center for Medicare and Medicaid Services (CMS) Medicare Marketing Guidelines:

> *"When conducting marketing activities, in-person or telephonically, a Plan/Part D Sponsor may not market any health care related product during a marketing appointment beyond the scope that the beneficiary agreed to before the meeting. The Plan/Part D Sponsor must document the scope of the appointment prior to the appointment. Distinct lines of plan business include MA, PDP and Cost Plan products. If a Plan/Part D Sponsor would like to discuss additional products during the appointment in which the beneficiary indicated interest, but did not agree to discuss in advance, the Plan/Part D Sponsor must document a second scope of appointment (SOA) for the additional product type to continue the appointment."*
>
> *"In instances where a beneficiary visits a Plan/Part D Sponsor or an agent/broker office on his/her own accord, the Plan/Part D Sponsor or agent/broker must document the SOA prior to discussing MA, PDP, or cost plans."*

Policy and Procedure

All licensed sales representatives, brokers or agents ("Agents") must obtain a signed Scope of Appointment (SOA) prior to any Medicare Advantage (MA) or Prescription Drug Plan (PDP) appointment. The SOA may be completed by paper, MAPA, Individual Voice Response (IVR), or by a telesales agent on a recorded line during the appointment setting process.

If an Agent is working at a formal or informal sales event, CMS has clarified that a SOA form is not needed to conduct MA/PDP sales presentations at the event. However, if an Agent schedules a follow-up appointment to meet with a beneficiary at a later date/time, the Agent would need to secure a SOA form prior to the appointment.

For all sales appointments (including telephonic presentations), CMS has the expectation that the scope of appointment be determined and a SOA form be executed prior to the beginning of any sales presentations.

EXAMPLE #1 – If a beneficiary walks in to an Agent's office or contacts the agent by phone wishing to hear about Medicare Advantage or Prescription Drug plan options, the agent should complete the SOA form, including any other health products they wish to discuss, and the beneficiary must sign the form BEFORE the agent discusses MA and/or PDP plans.

EXAMPLE #2 - If an Agent has a scheduled appointment and finds there are additional beneficiaries present who were not anticipated. The agent must have each beneficiary complete the SOA form **prior to** conducting the sales presentation. If any of the beneficiaries want to learn about plans other than what was originally agreed to by all parties, the agent must make a separate appointment with each person to discuss his or her desired plans.

Any health product to be discussed during an MA/PDP appointment must also be documented on the SOA form. Additional health products can include, but are not limited to:

- Free-Standing Dental
- Free-Standing Vision
- Medicare Supplement
- GTL Hospital Indemnity (except in Florida)

If the non-MA/PDP health products are not indicated clearly on the form, the agent will not be allowed to discuss those products during that appointment unless the beneficiary initiates the request for it. If the beneficiary initiates a discussion regarding another health product, a new SOA must be secured.

SOA forms or recordings must be stored for a minimum of 11 years and made available upon request by CMS, Humana, or any other authorized party. For agents utilizing the Humana SOA form/process (Paper, MAPA, IVR, and Telesales) the 11 year storage requirement will be met by Humana. Agents who use a non-Humana SOA form will be responsible for the 11 year storage requirement and must make the SOA forms available upon request.

Once a SOA is executed, it is the responsibility of the agent to complete "at the time of" or "post" appointment information on the form. This can include the appointment date, which Medicare plans were discussed during the appointment, and the enrollment application ID number, if one was taken. The SOA post appointment information must be completed either on paper, in MAPA, or via the online SOA tracking tool available on the Agent Portal at www.humana.com.

Methods

A Humana Scope of Appointment can be executed one of four ways.

1. Paper – Barcoded Paper SOA forms must be ordered through the Order Management System. Barcoded forms must not be photocopied, scanned, or reproduced in any way. Completed Paper SOA forms must be mailed to the address on the back of the SOA form for scanning and processing.
2. MAPA – A SOA form can be taken in MAPA and signed with the digital signature pad. MAPA SOA's are uploaded along with any enrollment forms by the agent. Each MAPA SOA receives an MAPA SOA ID number.

3. IVR – A SOA can be taken through the IVR process on a recorded line. The IVR captures all required information through touch-tone and voice recordings. Each IVR SOA receives an IVR Recording ID.
4. Telesales – A SOA can be taken through the lead setting process by DMS Telesales Agents. The DMS scripting guides the Telesales representative though all required information. Each DMS SOA receives an IVR Recording ID and will be indicated on the lead.

Monitoring and Oversight

The MarketPoint Sales Integrity Department (MSID) will have monitoring and oversight responsibility for this Scope of Appointment policy. MSID will audit to ensure agents are completing SOA forms as required by CMS. In the event a SOA for an enrollment form which required one cannot be found, the Agent of Record on the enrollment form will be responsible for producing the Scope of Appointment.

Disciplinary Standards

Agents who show a persistent pattern of non-compliance regarding this SOA policies and procedure will be subject to an escalating series of corrective actions that could lead up to and include termination of their employment with Humana or termination of their contract to represent Medicare products.

Related Links

CPL-021a Scope of Appointment Job Aid
CPL-020 Policy on Scope of Appointment Audit