

Final Rule 2024 FAQ – Scope of Appointment – 48 Hour Wait Period – Agent Training Use Only

Topic	Questions	Answers
48-hour Rule	1. What is the 48-hour waiting period?	The 48-hour waiting period requires that, after obtaining a valid SOA, agents must wait 48 hours to conduct a personal marketing appointment and complete a sales presentation with the beneficiary.
SOA	2. What is the definition of a valid SOA?	<p>For an SOA to be considered valid, it must include:</p> <ul style="list-style-type: none"> <li>- Product types to be discussed</li> <li>- Date of appointment</li> <li>- Beneficiary and agent contact information</li> <li>- Statement stating there is no obligation to enroll, current or future Medicare enrollment status will not be impacted, and automatic enrollment will not occur</li> <li>- Signature of the beneficiary within the last 12 months</li> </ul> <p>NOTE: The valid SOA must be secured at least 48 hours prior to the personal sales/marketing appointment (unless the beneficiary qualifies for an exemption). A new SOA is required if the beneficiary requests information regarding a different plan type than previously agreed upon.</p> <p>An SOA is not required to be collected on inbound phone calls. An SOA must be collected on outbound phone calls or in-person meetings.</p>
SOA	3. How long is a signed SOA valid per CMS guidelines?	In accordance with the Final Rule, the SOA is valid for 12 months after the date of signature. A business reply card (BRC) or permission to contact (PTC) is also valid for 12 months.
48-hour Rule	4. What are the exemptions to the requirement to wait 48-hours between obtaining a SOA and conducting a sales presentation?	<p>The 48-hour wait period does not apply if one of the following exemptions applies:</p> <ul style="list-style-type: none"> <li>- 4 days before the end of any valid election period for the beneficiary (AEP, OEP, SEP, and IEP). CMS has clarified in their commentary that this could be the end of AEP, the OEP, an SEP, or the ICEP. For these beneficiaries, the 48-hour rule will not apply if the SOA is completed during the last four days of the election period. For example, the AEP ends on December 7<sup>th</sup> of each year so if an SOA is completed on or after December 3<sup>rd</sup>, the personal marketing appointment can occur during the period between December 3<sup>rd</sup> and December 7<sup>th</sup>. If an election period ends on the 31<sup>st</sup> of the month, the SOA must have been completed no earlier than the 27<sup>th</sup> of that month.</li> <li>- Unscheduled in-person meetings (walk-ins) prompted by the beneficiary, their POA, or authorized representative. CMS has clarified in their commentary that beneficiaries who walk into an agent’s office, kiosk, a plan’s office, or any other walk-in will not be subject to the 48-hour rule. This exception will assist beneficiaries who have transportation issues and those that have traveled long distances to see an agent. <i>Note: Refer to question 14 for application of this requirement during in-person events, including informal marketing events.</i></li> </ul>

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		<ul style="list-style-type: none"> <li>- Inbound telephone call from the beneficiary, their POA, or authorized representative to a sales agent.</li> </ul>
48-hour Rule	5. May the beneficiary waive the 48-hour period between an SOA and a sales presentation?	The 48-hour wait does not apply if one of the three defined exemptions is met, as depicted in question 4. Otherwise, the agent must follow the requirement. There is no beneficiary ‘waiver’ option available.
48-hour Rule	6. Which products are impacted by the SOA 48-hour wait period?	The products impacted by the Final Rule include MA, MAPD, PDP, and OSB plans. Products that are not regulated by CMS are not subject to this requirement.
48-hour Rule	7. Does the 48-hour wait period between Scope of Appointment and enrollment apply to agents directly employed by carriers and brokerages? Or are agents directly employed by carriers exempt from this requirement?	The 48-hour wait period applies to any personal marketing appointments (except for the exemptions noted above) made by any entities who sell Medicare Advantage plans to consumers including employed agents of a carrier or through third parties, such as brokerages, agencies, call centers, and independent agents. There is not an exemption for any agents or agencies within the Final Rule.
SOA	8. Can an SOA be obtained proactively on every beneficiary interaction?	<p>An SOA can be obtained in the following situation(s):</p> <ul style="list-style-type: none"> <li>- Marketing events or seminars</li> <li>- Inbound and outbound phone calls with PTC.</li> </ul> <p>An SOA cannot be obtained in the following situation(s):</p> <ul style="list-style-type: none"> <li>- Educational events</li> </ul>
SOA	9. Can an SOA be used by <u>any</u> agent within the same agency in a 12-month period?	<p>Any licensed sales agent may enroll a beneficiary if a valid SOA has been collected by the agency at least 48 hours before the enrollment transaction or the beneficiary qualifies for a CMS-defined exemption. The SOA must have been executed within 12 months prior to the enrollment call. If the agent collecting the SOA may be different than the agent facilitating the sales presentation, the beneficiary should be made aware that they may be assisted by another agent in the future.</p> <p>As a reminder, if at any point in the appointment/call, the nature of the plan conversation changes from the products originally indicated on the SOA, a new SOA will need to be secured in advance of any new plan discussions.</p> <p>The agent is responsible for determining the validity of the SOA and whether the SOA is still eligible for use.</p>

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48-hour Rule	10. May agents complete a sales presentation on an outbound call to a prospect or member?	<p>On an initial outbound call, when responding to a PTC or BRC, the agent may obtain an SOA and set up a personal marketing appointment (telephonic, virtual or in-person) to complete the sales presentation 48 hours after the OB call. The only time a sales agent may complete a sales presentation during the initial outbound call is if the beneficiary is within 4 days of the end of a valid election period or if the agent had already obtained a valid SOA for the beneficiary 48 hours prior to the call. A valid SOA must be secured prior to any sales presentation. If the existing SOA does not contain all the products that the beneficiary would like to discuss, a new SOA must be obtained. <i>Note: Agents should refer to their agency’s policies regarding appropriate PTC and when permission for outreach has been granted, including those times in which an existing business relationship (EBR) may exist.</i></p> <p>This guidance applies to interactions with both prospects and members.</p> <p>Note: Refer to question 2 for definition of a valid SOA. Refer to question 26 regarding steps that the agent may take if the beneficiary asks for a sales presentation on an outbound call.</p>
DMM	11. Can a prospect or member enroll through DMM (or Sunfire PURL) after a sales presentation? When can a DMM be sent to prospects or members in accordance with the 48 hour waiting period?	<p>Yes. A prospect or member may enroll through a DMM or Sunfire PURL after completion of a compliant sales presentation. The agent may not send the beneficiary a DMM or PURL prior to the sales presentation/marketing appointment. When scheduling the personal marketing appointment, the agent would need to adhere to the 48 hour waiting period between obtaining an SOA and performing a sales presentation, unless one of the exemptions to the waiting period has been met. Prior to the scheduled appointment, the agent may direct the beneficiary to Humana.com to review all Humana plans available in the beneficiary’s service area and encourage the beneficiary to discuss healthcare options with caretakers, POA, or others in preparation for the personal marketing appointment.</p> <p>To view the exemptions to the 48 hour waiting period, refer to question 4. For additional details regarding contact with beneficiaries on outbound calls, refer to question 11.</p>
PTC/BRC	12. How long can a PTC/BRC be utilized to call a potential enrollee?	<p>The PTC/BRC is valid for 12 months following the date of beneficiary’s signature date or the date of the beneficiary’s initial request for information. However, as a best practice, agents should contact a beneficiary to respond to their request for information as soon as possible. If the beneficiary indicates they no longer wish to be contacted, the agent may not continue to use the existing PTC/BRC to make future contact.</p>

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PTC/BRC	13. Is a PTC/BRC the same as a SOA?	<p>A PTC or BRC is documentation that permits the agent to contact a beneficiary for 12 months from the time period that permission was granted, unless otherwise revoked or exhausted before expiration of the 12 month period. A PTC/BRC is NOT an SOA as these documents do not meet the required elements of an SOA.</p> <p>A PTC/BRC is considered ‘exhausted’ upon contact with the beneficiary. A new PTC/BRC would be needed to conduct subsequent contact with the beneficiary.</p>
Field	14. What is considered an in-person walk-in? Office? Provider office agent of the day? Retail setting? Humana RV?	<p>At a marketing event (formal or informal), the agent may collect SOAs and set up a future personal marketing appointment (with PTC to contact) to occur after 48 hours has passed. If a sales agent is approached by a beneficiary at a sales/marketing event and the beneficiary indicates that they want to be enrolled into a plan, the agent must collect a valid SOA and can schedule a personal sales/marketing appointment to occur at least 48 hours after obtaining the SOA. If the beneficiary states that they do not want to or cannot wait at least 48 hours for the appointment, the agent may proceed with the sales presentation after the event. In this scenario, the walk-in exception to the 48-hour waiting period would apply only if the beneficiary walks up to or approaches the sales agent requesting a personal marketing meeting immediately following the formal or informal sales/marketing event. Note: An SOA would still be required prior to the appointment, but the 48-hour waiting period would not apply. Keep in mind that personal information may be shared during informal marketing events, therefore consideration should be given to the location in which these ‘walk-in’ discussions occur.</p> <p>The beneficiary may also be enrolled without a 48-hour waiting period if they are within 4 days of the end of a valid election period or if the agent has obtained a SOA for the beneficiary 48 hours prior to the appointment. A valid SOA must be secured prior to any sales presentation. If the existing SOA does not contain all the products that the beneficiary would like to discuss, a new SOA must be obtained and the 48 hour waiting period would apply (unless an exemption exists).</p> <p>Note: SOA can only be obtained at informal or formal marketing events. An agent may not collect an SOA or schedule a future marketing appointment at an educational event. The agent may only obtain a PTC/BRC or provide the agent’s contact information to a beneficiary at an</p>

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		<p>educational event. The agent may use this PTC/BRC to contact the beneficiary at a later time to obtain an SOA and set up a future marketing appointment.</p>
Field	<p>15. What beneficiary information can be captured at an educational event? Or in-person marketing event?</p>	<p>The following beneficiary information can be captured at an <u>educational event</u>:</p> <ul style="list-style-type: none"> <li>- Business Reply Cards</li> <li>- Permissions to Contact</li> </ul> <p>Agents may also make available business cards for beneficiaries to take at educational events. Agents are prohibited from setting up personal marketing appointments or collecting SOAs at educational events.</p> <p>Agents may capture the following items at <u>marketing events</u>:</p> <ul style="list-style-type: none"> <li>- Business Reply Cards</li> <li>- Permissions to Contact</li> <li>- Scope of Appointments</li> </ul> <p>Agents may also make available business cards at marketing events and set up future personal marketing appointments, in accordance with the 48-hour requirements. Refer to question 4 for exemptions to the 48 hour waiting period. Refer to question 14 for further details regarding in-person marketing events.</p>
PTC/BRC	<p>16. May telesales or field agents make outbound marketing calls to Medicare beneficiaries who are not current Humana members?</p>	<p>Telesales and field agents must have a valid permission to contact or business reply card to perform outbound calls to beneficiaries who are not current members, otherwise the contact would be considered unsolicited.</p>
48-hour Rule	<p>17. Are inbound calls the same as an in-person outreach by a Medicare beneficiary?</p>	<p>CMS has indicated the 48-hour rule is not applicable to inbound telephone calls. As such, there is an exemption for an inbound telephone call, as well as an exemption for an in-person walk-in of a beneficiary.</p> <p>Note: Inbound calls do not require completion of an SOA.</p>
48-hour Rule	<p>18. How does the 48-hour SOA waiting period apply to telesales agents?</p>	<p>The 48 hour waiting period between an SOA and sales presentation applies to both field and telesales agents and is consistent for both types of agents.</p> <p>CMS has indicated the 48-hour rule is not applicable to inbound telephone calls nor is an SOA required to be obtained on inbound calls. The 48 hour waiting period and need to secure an SOA would apply to outbound calls that do not qualify for an exemption to the waiting period, regardless of whether the individual is an existing member.</p>

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48-hour Rule	19. Is CMS reintroducing the 48-hour waiting period between SOA and a sales presentation?	<p>Yes. In prior years, there was a 48-hour waiting period between the SOA and sales presentation, when practicable. This has been updated within the Final Rule, applicable for all contract year 2024 marketing and communications beginning September 30, 2023, to remove the ‘when practicable’ language. Instead, CMS is permitting 3 exceptions:</p> <ul style="list-style-type: none"> <li>- When a beneficiary is within 4 days of the end of a validate election period (SEP, OEP, AEP, IEP)</li> <li>- When the beneficiary is an in-person walk-in.</li> <li>- When the beneficiary calls an agent (inbound phone call only).</li> </ul>
48-hour Rule	20. How does the 48-hour rule apply to telesales agents who may be setting appointments for field agents?	<p>A call center agent may obtain a SOA, on an inbound or outbound call with appropriate permission, for a field agent and set an appointment for the field agent that occurs 48 hours after the call in which the SOA was obtained. If the beneficiary wants to enroll on the same day in-person, the telesales agent may refer the beneficiary to a local market office, kiosk, or similar and advise the beneficiary to ask for a personal marketing appointment to occur immediately as this would be consistent with an exemption to the 48-hour waiting period. Similarly, if the individual prefers to enroll immediately and walking into a location is not feasible, the agent may offer other approved forms of immediate enrollment such as making an inbound call to the telesales agent, Humana.com, or 1-800-Medicare.</p>
SOA	21. Can a SOA be re-used for multiple personal marketing appointments or does a unique SOA need to be obtained prior to each personal marketing appointment?	<p>A valid SOA may be used for subsequent marketing appointments if the beneficiary decides not to enroll during the initial marketing appointment and would like to take additional time to review their plan options. If within 12 months, the beneficiary contacts the agent or sets up a future marketing appointment to discuss the same plans as the initial marketing appointment, a new SOA would not be required. If the beneficiary decides to enroll into a plan, the SOA has been utilized and a new SOA will need to be obtained for subsequent plan conversations and the 48-hour rule would apply (unless an exemption exists). The agent should not utilize the SOA to contact the beneficiary if they have indicated in the previous appointment that they do not want to enroll in a plan or do not wish to be contacted by an agent. In instances in which the beneficiary requests not to be contacted, the agent would use existing processes to document the do not call request.</p>
SOA	22. Will CMS allow using a non-carrier specific SOA? Will Humana require use of their proprietary SOA?	<p>Guidance as to what type of SOA is allowed has not changed in the Final Rule. As such, use of a any SOA with all required fields will still be acceptable. Non-employed agents have the flexibility to utilize the SOA of their choosing.</p>
SOA	23. Are SOAs going to be required to be sent to carriers?	<p>Guidance related to retention of SOAs has not been modified in the Final Rule. The requirement remains that the SOA must be retained for 10 years. Humana requires that agents</p>

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		<p>complete a valid SOA prior to personal marketing appointments and send in the completed SOA along with each enrollment form.</p>
48-hour Rule	<p>24. If a consumer utilizes a direct chat function while browsing on a health plan website and is transferred to an agent, would the agent need to set a callback in 48 hours to effectuate the enrollment?</p>	<p>If the beneficiary calls the agent during the chat exchange, the agent should follow the guidance for inbound calls. If the agent calls the beneficiary, after obtaining appropriate permission to contact, the agent should follow the guidance for outbound calls, which would require a 48 hour waiting period.</p> <p>Refer to question 4 for guidance regarding inbound calls and question 11 for guidance regarding outbound calls.</p> <p>The consumer has granted PTC by providing the phone number and agreeing to be called, but it is still an outbound call. Alternatively, if the agent provides their phone number and the consumer calls the agent, this would be considered an inbound call. The agent can arrange a time to call the individual at their preference to secure a SOA and then schedule a sales appointment after 48 hours.</p>
48-hour Rule	<p>25. If a telesales agent receives a call transferred from another department, such as Customer Service, and the beneficiary requests a sales presentation, i.e, requests to learn about plan options in the area, would the agent need to schedule a callback within 48 hours to conduct the sales presentation?</p>	<p>If the beneficiary called Customer Service, Customer Service determined that the beneficiary’s inquiry would require discussion with a licensed sales agent, and the beneficiary agreed to be transferred to a licensed sales agent, this would be consistent with an inbound call to an agent. If Customer Service performed outreach to the beneficiary, this would be treated in a manner consistent with the guidance for outbound calls. The agent would be required to obtain an SOA prior to conducting the sales presentation, and as a best practice, should offer an appointment 48 hours from the date of the SOA.</p> <p>Agents should reference question 4 for guidance related to inbound calls and question 11 for guidance related to outbound calls.</p>
48-hour Rule	<p>26. What should agents tell beneficiaries who want to have the sales presentation immediately but are not able to for another 48 hours?</p>	<p>If beneficiaries do not meet one of the exemptions to the 48-hour wait period, as outlined within the Final Rule, agents should inform beneficiaries that a CMS regulation requires a wait period between the SOA and a sales presentation. As such, the agent must wait for 48-hours from obtaining the SOA and to complete the sales presentation and enrollment. This is to allow time for the beneficiary to review their plan options and invite POAs or others that may help the beneficiary with their healthcare decisions to the marketing appointment. The agent should offer an appointment after the 48 hours to complete the sales presentation. Alternatively, the beneficiary can make an inbound call to the agent, which does not require a 48 hour waiting period. The agent may also suggest that the beneficiary review plans available in their zip code through Humana.com to prepare for the marketing appointment.</p>

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		<p>The agent may offer other approved forms of self-enrollment, such as Humana.com, or 1-800-Medicare.</p>
48-hour rule	27. If a beneficiary wants to complete an enrollment during an initial outbound call, could the enrollment be completed and pend for 48 hours prior to being submitted?	<p>Sales presentations that are completed and enrollments that are accepted by the agent, agency, or the health plan prior to completion of the 48-hour wait period that do not qualify for one of the CMS-defined exemptions, even if pended for 48 hours before final submission, would not be compliant with the Final Rule. A sales agent is not able to complete a sales presentation or discuss benefits prior to expiration of the 48-hour waiting period unless the beneficiary meets criteria for an exemption to this waiting period. Holding or pending of applications to forgo the 48-hour rule is not permitted. Humana’s Sales Integrity teams will conduct oversight activities to monitor compliance with the 48-hour requirement.</p>
48-hour rule	28. How will this requirement protect beneficiaries?	<p>This regulation is designed to allow beneficiaries more time to better understand and assess their plan options, prior to completing a sales presentation with a sales agent. The beneficiary may also consult with or invite caretakers, POAs, or others who help the beneficiary with their healthcare decisions to the appointment.</p>
48-hour rule	29. What happens if an agent or carrier receives allegations because of adhering to the 48-hour requirement?	<p>Allegations received by Humana are investigated by the Agent Investigation Unit (AIU), including those that may be received for adhering to the 48-hour wait period. These allegations would be investigated through AIU’s normal processes.</p>
48-hour rule	30. How does the 48-hour waiting period apply to current members calling in for a plan-to-plan change? How does it apply to agents calling members regarding a plan-to-plan change?	<p>If the member calls the agent to review their plan options, including plan-to-plan changes, this would be consistent with an inbound call to an agent. If the agent contacted the member to review plan opportunities, with appropriate permission, this would be treated in a manner consistent with the guidance for outbound calls.</p> <p>Agents should reference question 4 for guidance related to inbound calls and question 11 for guidance related to outbound calls.</p>
48-hour rule	31. How does the 48-hour rule apply when a beneficiary meets an agent using a web-based video technology like Zoom?	<p>Communications through Zoom and other web-based video technology would be treated in a manner consistent with telephonic transactions. Agents should apply to same procedures for inbound and outbound calls when using Zoom or other web-based video technology.</p> <p>Refer to question 4 for guidance regarding inbound calls and question 11 for guidance regarding outbound calls.</p>



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48-hour rule	32. When can an agent send a Text Sig link to a beneficiary?	<p>An agent may send a Text Sig link to a beneficiary upon completion of a compliant sales presentation and upon the beneficiary’s decision to enroll into a plan. The Text Sig should only be sent at the beneficiary’s preference.</p> <p>To complete the sales presentation, the agent should follow the guidance for other transactions to ensure that a valid SOA has been obtained prior to the presentation. The agent should confirm that 48 hours have passed since the SOA was obtained or that the beneficiary meets one of the exemption criteria prior to completing a sales presentation.</p>
48-hour rule	33. When can an agent send a Wet Sig or paper application to a beneficiary?	<p>An agent may send a Wet Sig or paper application to a beneficiary upon completion of a compliant sales presentation and upon the beneficiary’s decision to enroll into a plan. The Wet Sig or paper application should only be sent at the beneficiary’s preference.</p> <p>To complete the sales presentation, the agent should follow the guidance for other transactions to ensure that a valid SOA has been obtained prior to the presentation. The agent should confirm that 48 hours have passed since the SOA was obtained or that the beneficiary meets one of the exemption criteria prior to completing a sales presentation.</p>
48-hour rule	34. Does the 48-hour waiting period apply if the member calls the agent to review their ANOC? Does it apply if the agent calls the member?	<p>If the member calls the agent to review their ANOC, this would be consistent with an inbound call to an agent. If the agent contacted the member to review an ANOC, with appropriate permission, this would be treated in a manner consistent with the guidance for outbound calls.</p> <p>Agents should reference question 4 for guidance related to inbound calls and question 11 for guidance related to outbound calls. Keep in mind discussing plan options, rates, benefits, and similar are not permitted prior to 10/01. During an ANOC prior to 10/1 the agent may set an appointment, with permission, on or after 10/1 to discuss the ANOC or other plan options.</p>
PTC/BRC	35. How should an agent respond to PTCs obtained through Humana.com?	<p>The agent should follow current processes for responding to PTCs. If the beneficiary would like a sales presentation, the agent should obtain a valid SOA for products that the beneficiary would like to discuss and follow the guidance for the wait period related to outbound calls.</p> <p>Refer to question 11 for further guidance regarding outbound calls.</p>
48-hour rule	36. How should an agent proceed on outbound calls using CART or Producer Agent Messaging System (AMS)?	<p>An agent calling a member through a CART or Producer AMS campaign would be consistent with the guidance for any other outbound call to a member from the agent.</p> <p>Refer to question 11 for further guidance regarding outbound calls.</p>

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48-hour rule	37. When can an agent leave a paper application with the beneficiary after a sales presentation?	<p>If there is not a valid SOA associated with the beneficiary, the agent should obtain a SOA prior to conducting the sales presentation at the in-person initial meeting. Once obtained, the agent can set-up an appointment 48 hours after the initial in-person meeting to complete a sales presentation for plans of interest to the beneficiary, as agreed-upon within the SOA, unless the walk-in exception applies, in which case the 48 hour waiting period would not be required. The agent may not send the beneficiary/member a DMM or provide an application to the beneficiary/member prior to the sales appointment, as the agent would not be able to perform a sales presentation during the initial in-person meeting, unless the walk-in or another exception is applicable. Prior to the scheduled appointment, the agent may direct the beneficiary to Humana.com to review all Humana plans available in the service area and encourage the beneficiary to discuss healthcare options with caretakers, POA, or others to prepare in advance for the personal marketing appointment. The beneficiary may also invite these individuals to the personal marketing appointment.</p> <p>If the agent has completed a personal marketing appointment and sales presentation with a beneficiary, the agent may send or leave a paper application with the beneficiary.</p> <p>The agent may also obtain a SOA, complete a sales presentation, and leave a paper application with the beneficiary in the same in-person meeting if the beneficiary meets the exemptions for an in-person walk-in or if it is within 4 days of the end of a valid election period.</p> <p>Note: This guidance applies to both prospects and members.</p>
48-hour rule	38. During a chat via Humana.com, how would an agent handle a request to be called from a beneficiary or member?	<p>The agent may provide his/her number and if the beneficiary calls the agent, this is an inbound call. Refer to question 4 for guidance regarding inbound calls.</p> <p>If the beneficiary provides their number, and the agent calls them, this would be considered an outbound call. Refer to question 11 for further guidance regarding outbound calls. The consumer has provided PTC by providing the phone number and agreeing to be called.</p>