

ANTHEM VENDOR CHECKLIST FOR TCPA COMPLIANCE

(To be used upon initiation of vendor relationship and periodically thereafter, as needed.)

Vendor Company Name:

Vendor Contact Name:

Date Submitted to Anthem:

#	Question	Response
1.	Describe generally how you approach compliance with the Telephone Consumer Protection Act (TCPA) and the FTC's Telemarketing Sales Rule (TSR) if applicable to your business.	
2.	Do you use a dialer, also known as an automatic telephone dialing system (ATDS), for outbound calls for Anthem?	
3.	Please identify the brand name of any dialer you are using for Anthem.	
4.	If you believe that you do not use an ATDS but you make outbound calls for Anthem, has your telephone system been reviewed to confirm it does not constitute an ATDS? If yes, identify who performed this review.	
5.	Do you have TCPA and TSR policies and procedures?	

	Please provide copies.	
6.	Have you implemented these policies and procedures? If yes, describe your oversight of your internal compliance with the policies and procedures.	
7.	Do you have TCPA and TSR training? If yes, please describe the training, including: <ul style="list-style-type: none"> a) categories of persons subject to training; b) frequency of training; and c) whether testing is involved. 	
8.	Does your company make any health-related or informational calls for Anthem?	
9.	Does your company make any telemarketing/telesales calls for Anthem? <ul style="list-style-type: none"> a) If yes, which states do you call into for Anthem? b) Is your company required to have a license in the states into which it calls on behalf of Anthem, and, if yes, do you have the licenses? Please provide documentation of your licenses. 	
10.	Do you place prerecorded outbound calls on behalf of Anthem?	
11.	How does your company handle Do Not Call Requests?	

12.	How are Do Not Call Requests transmitted to Anthem? How often? How long do you retain this information?	
13.	Does your company call, append, or use any telephone numbers obtained from any look-up services (such as whitepages.com) for Anthem?	
14.	Please describe your policies and procedures when telephone numbers that Anthem provides are found to be invalid.	
15.	Please describe any scenario where cell phone numbers would be scrubbed out of the calling or texting campaign.	
16.	Please describe what happens when Anthem requests that cell phone numbers be scrubbed out of the calling or texting campaign.	
17.	What is your company's document retention policy as to work done for Anthem? What types of documents are retained?	