

COMPLIANCE CHECKLIST

Are you ready for the Keep Contact Centers in America Act?

Navigating current and anticipated legislation requires a proactive approach to compliance today and tomorrow. This checklist is designed to help business leaders, compliance officers, and customer-service leaders identify key compliance requirements, prepare for likely changes, and avoid costly remediation and penalties.

Use it to assess your call-center operations, vendor relationships and disclosure processes. Review each item, assign accountability and check off steps as they are completed. This helps ensure your organization is ready for evolving federal requirements (*U.S. Senate Bill S.2495) and able to maintain trust with both regulators and consumers.

LOCATION AND LABOR COMPLIANCE

- Audit all in-house and outsourced call center locations. Document agent headcount and weekly hours to determine applicability thresholds (for example, 50 or more employees or 1,500 or more aggregate hours per week).
- Assess any current or planned relocations of customer service work. If 30 percent or more of operations are, or will be, performed offshore, confirm that advance notice procedures are in place.
- Verify that required notices are filed with the Department of Labor at least 120 days prior to any qualifying relocation.
- Review whether your organization is listed, or could be listed, on the Department of Labor public offshore relocation list. Document potential duration and business impact.
- Evaluate the risk of losing local, state, or federal grants, loans, or contracts for up to five years if listed. Assess exposure across all government funding sources.

VENDOR AND OUTSOURCING GOVERNANCE

- Review all vendor and partner contracts for compliance with location disclosure, notification and transfer requirements.
- Confirm that third-party providers maintain documented processes for meeting federal disclosure and reporting obligations.
- Ensure vendor agreements include audit rights, compliance attestations and remediation expectations.
- Assign internal ownership for ongoing vendor compliance monitoring and documentation.

CUSTOMER DISCLOSURES AND CX OPERATIONS

- Confirm that customer service systems and scripts disclose agent location at the start of each interaction.
- Ensure customers are offered an immediate transfer to a U.S.-based agent upon request.
- Validate that disclosure language is consistent across voice, chat, and digital channels.
- Document exception scenarios where disclosures may not be required, such as U.S.-only operations, consumer-initiated contact with a foreign business, or emergency service situations.

AI TRANSPARENCY AND FUTURE-STATE READINESS

- Disclose the use of artificial intelligence in customer service interactions upfront.
- Ensure customers can request a transfer to a U.S.-based human agent when AI tools are used.
- Review and document annual Federal Trade Commission compliance, certification, and recordkeeping requirements.
- Establish standard operating procedures for audits, training updates, and regulatory change management.
- Engage legal, information technology, and compliance teams in ongoing review to protect eligibility for government benefits and contracts.

NEED HELP ENSURING FULL COMPLIANCE?

Speak with a Working Solutions expert to ensure your contact center operations, vendors and disclosures align with current and emerging regulations, without slowing down your business.

