



Frequently Asked Questions: National Producer Number (NPN) Override

Can agents and brokers submit a Marketplace application with a National Producer Number (NPN) that is not their own?

Published July 3, 2024

- Yes. In some cases, a Marketplace-registered agent, broker or web-broker may submit a Marketplace application with an NPN that is not their own. However, agents, brokers and web-brokers must ensure they comply with Marketplace requirements, including the standards of conduct under 45 CFR 155.220(j), Marketplace agreements* and applicable state laws and regulations, when they do so.

The following is a non-exhaustive list of situations where an agent, broker or web-broker **may NOT** submit an NPN that is not their own when assisting with or facilitating a Marketplace consumer enrollment or submission of an eligibility application.

- In a state that requires appointments, the agent, broker or web-broker actively assisting the consumer with the application, plan selection and/or enrollment is not appointed with the issuer of the plan in which the consumer enrolls.
 - Agents, brokers and web-brokers may not use a referral program from another agent, broker, agency or web-broker as a means to violate state appointment rules.
 - Agents, brokers and web-brokers may refer consumers to, or receive referrals from, other entities as permitted by state laws and regulations. The agent, broker or web-broker who receives the referral must be the one to actively assist the client with the Marketplace application and/or enrollment and must be appointed with the issuer.
 - Agents, brokers and web-brokers should contact the relevant state authority for information on the licensing and appointment requirements in the states in which they assist consumers.
- The agent, broker or web-broker who is actively assisting the consumer with an enrollment or application for coverage through the Federally-facilitated Marketplace or a State-based Marketplace using the Federal Platform does not have documentation of consumer** consent and review and confirmation of the accuracy of eligibility application information.

- The agent, broker or web-broker who is actively assisting the consumer with an enrollment or application for coverage through the Federally-facilitated Marketplace or a State-based Marketplace using the Federal Platform is not licensed in their resident state and the state of the enrollment (if different).
 - Agents, brokers and web-brokers should contact the relevant state authority for information on the licensing and appointment requirements in the states in which they assist consumers.
- The agent, broker or web-broker who is actively assisting the consumer with an enrollment or application for coverage through the Federally-facilitated Marketplace or a State-based Marketplace using the Federal Platform has not completed Marketplace registration and required training and has not signed the applicable Marketplace Agreements with CMS for the applicable plan year.

*This includes the “Privacy and Security Agreement Between Agent or Broker and the Centers for Medicare & Medicaid Services for Individual Market Federally-facilitated Exchanges and State-based Exchanges on the Federal Platform” and the “Agent Broker General Agreement for Individual Market Federally-facilitated Exchanges and State-based Exchanges on the Federal Platform.”

**or the consumer’s Authorized Representative

If you need additional assistance, contact the Agent/Broker Email Help Desk at FFMProducer-AssisterHelpDesk@cms.hhs.gov.

Helpful Resources:

- [2024 Payment Notice FAQs: Consent and Application Review Documentation Requirements](#)
- [What do I need to do if I want to start selling coverage through the Federally-facilitated Marketplace \(FFM\)?](#)
- [How do I receive compensation for helping a consumer with their Marketplace application?](#)
- [What are the steps for completing Marketplace registration and training?](#)
- [Can multiple agents and brokers enter the same NPN, such as an agency NPN, on a consumer’s application instead of their individual NPN? If my agency does this, does each agent or broker need to complete Marketplace registration and training?](#)
- [NPN Validation FAQs](#)

Can multiple agents and brokers use the same National Producer Number (NPN) for Marketplace enrollments, such as the NPN of an agency owner/principal, instead of their individual NPNs?

Published July 3, 2024

- Yes. A business entity may have its affiliated agents and brokers submit the same NPN on Marketplace applications as long as all of the agents and brokers using the NPN have completed Marketplace registration and the required training for the applicable plan year, signed the applicable Marketplace Agreements with CMS for the applicable plan year, have appropriate issuer appointments, and are complying with applicable state laws and regulations and CMS regulations, including 45 C.F.R. 155.220(j). As a reminder, agents, brokers and web-brokers may not submit an NPN that is not their own on a consumer's Marketplace enrollment as a way to violate Marketplace requirements or state laws and regulations, including licensure and appointment requirements. For more information on when it is acceptable to submit an NPN that is not your own, [review this FAQ](#).

Does a business entity need to be registered with the Marketplace for its National Producer Number (NPN) to be included on a Marketplace application?

Published July 3, 2024

- Yes. If that business entity NPN will be used on applications when agents or brokers are assisting Marketplace consumers with enrolling in qualified health plans (QHPs) or applying for advance payments of the premium tax credit (APTC) and cost-sharing reductions (CSRs) on the Federally-facilitated Exchanges (FFE) or State Exchanges using the Federal platform (SBE-FPs), the person associated with the business entity NPN must register, complete required training, and sign the applicable Marketplace Agreements with CMS for the applicable plan year. These are annual requirements that need to be met anew each plan year.

Please note the following steps when completing Marketplace registration for a business entity's NPN to be used on Marketplace applications:

For business entities that wish to register and participate in the FFEs and SBE-FPs, the business entity must select an authorized official who is a licensed health agent or broker to complete the required training and registration and sign the applicable Marketplace Agreements with CMS for the applicable plan year using the business entity NPN. Only **one individual** may complete this annual training, registration, and Agreements process for that business entity NPN. For example, the business entity may select the president or the Chief Executive Officer to complete the training, or select another authorized representative, to conduct these activities on behalf of the business entity using the business entity's NPN.

If an agent or broker is associated with multiple NPNs — for example, an agent or broker who is licensed as an individual and is also the representative for a business entity NPN — that agent or broker may add the business entity NPN onto their Marketplace Learning Management System (MLMS) profile page after completing the annual required training and registration and signing the applicable Marketplace Agreements by updating the business entity profile section. The addition of the business NPN will register the business entity with the Marketplace and associate that agent or broker with the business entity NPN. The Registration Completion Certificate for that agent or broker will then list both NPNs. That agent or broker will only have to take the training once for each applicable plan year.

This means **only** the authorized agent or broker who completes this process for the business entity NPN (possibly the business/agency owner) should enter both an individual and business entity NPN on the MLMS profile.

Agents and brokers must enter each NPN correctly during the Marketplace registration process and when submitting applications or enrollments to the FFEs and SBE-FPs. Do not add any leading zeroes.

At this time, CMS is only validating individual NPNs and not business entity NPNs. This means business names and contact information will not be listed on Find Local Help.

In addition, each individual agent or broker who wishes to include the Marketplace-registered business entity's NPN on Marketplace enrollments or applications must also complete the annual Marketplace registration, take the required trainings, and sign the Marketplace Agreements with CMS for the applicable plan year using their individual NPN prior to assisting Marketplace consumers.

If you need additional assistance, contact the Agent/Broker Email Help Desk via email at FFMProducer-AssisterHelpDesk@cms.hhs.gov.

Helpful Resources:

- [National Producer Number \(NPN\) Validation Frequently Asked Questions \(FAQs\)](#)

If a Marketplace-registered business entity has a National Producer Number (NPN) which is used for Marketplace enrollments or applications, does each agent or broker using that NPN need to complete Marketplace registration and training?

Published July 3, 2024

- Yes. Regardless of the NPN used on Marketplace enrollments and applications, prior to actively facilitating or assisting consumers with Marketplace enrollments in qualified health plans or the submission of applications for advance payments of the premium tax credit and cost-sharing reductions for qualified health plans on the Federally-facilitated Exchanges (FEEs) or State Exchanges using the Federal platform (SBE-FPs), each assisting agent or broker must complete the required annual Marketplace training and registration and sign the applicable Marketplace Agreements with CMS for the applicable plan year using their individual NPN. Additionally, the person associated with the business entity NPN must complete the required annual Marketplace training and registration and sign the applicable Marketplace Agreements with CMS for the applicable plan year on behalf of the business entity before the business entity NPN can be used on Marketplace enrollments and applications.