

Marketplace Consumer Consent and Compliance

Centers for Medicare & Medicaid Services (CMS)
Center for Consumer Information & Insurance Oversight (CCIIO)

September 19, 2024

Disclaimer



The information provided in this presentation is intended only as a general, informal summary of technical legal standards. It is not intended to take the place of the statutes, regulations, and formal policy guidance that it is based upon. This presentation summarizes current policy and operations as of the date it was presented. Links to certain source documents have been provided for your reference. We encourage audience members to refer to the applicable statutes, regulations, and other interpretive materials for complete and current information about the requirements that apply to them. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law.

This document generally is not intended for use in the State-based Marketplaces (SBMs) that do not use HealthCare.gov for eligibility and enrollment. Please review the guidance on our Agent and Broker Resources webpage (<http://go.cms.gov/CCIOAB>) and Marketplace.CMS.gov to learn more.

Unless indicated otherwise, the general references to "Marketplace" in the presentation only include Federally-facilitated Marketplaces (FFMs) and State-based Marketplaces on the Federal Platform (SBM-FPs).

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Agenda



- 1** New System Updates to Agent/Broker-Assister Applications
- 2** Consumer Consent and Application Review Requirements
- 3** Marketing and Advertising in the Marketplace
- 4** Security and Privacy Concepts and Principles
- 5** Key Takeaways
- 6** Live Question/Answer Session
- 7** Resources & Reminders

Agents and Brokers Help Expand Marketplace Enrollments

- » **Agents and brokers continue to help expand healthcare coverage** to millions of Americans across the country.
- » **Most agents and brokers are protecting their clients** by following compliant Marketplace practices.
- » However, a recent uptick in unauthorized activity by a **small number of bad actors** is causing disproportionate harm to consumers and agents and brokers.
- » Recent system changes and continued enforcement activities seek to:
 - Remediate impacts to consumers;
 - Remove bad actors who violate Marketplace regulations; and
 - Revamp operations to prevent unauthorized activity.



This webinar will review the **compliance requirements** and **actions CMS has taken** to improve the consumer experience and mitigate unauthorized activities in the Marketplace.

CMS is Remediating Impacts to Consumers



Remediate

- » When an unauthorized plan switch has been identified, CMS instructs the issuer offering the plan the consumer originally selected to **reinstate the consumer's enrollment** as if it had not been terminated.
 - The insurer must **cover all eligible claims incurred** and accumulate all cost sharing toward applicable deductibles and annual limits on cost sharing.
- » Consumers and the Internal Revenue Service (IRS) will **receive updated tax forms** to prevent adverse tax implications.
- » **CMS is accelerating review and resolution for all new complaints related to unauthorized plan switches and enrollments.**

CMS is Removing Bad Actors Who Violate Marketplace Regulations



Remove

- » **CMS' goal is to expel bad actors from the Marketplace through increased review and enforcement actions.**
- » CMS has ramped up its review of alleged fraudulent or abusive conduct and is **issuing suspensions and terminations** of these agents' and brokers' Marketplace agreements with HHS, as appropriate.
- » CMS is working with a variety of partners, including state DOIs, issuers, and law enforcement, to accomplish this.
- » CMS is **barring these agents and brokers from being able to enroll consumers** in Marketplace coverage and to be compensated moving forward.

CMS is Revamping Operations to Prevent Unauthorized Activity



Revamp

- » **CMS has implemented system changes to block bad actors from conducting fraudulent and abusive activities.**
- » Federally-facilitated Marketplace (FFM) systems now **require the direct involvement of consumers** to add or change the agent associated with the consumer's enrollment.
 - Changes made by an agent or broker not already associated with the consumer **will now go through a three-way call with the consumer and the Marketplace Call Center (MCC)** to ensure the consumer is aware of the changes being made.
 - Alternatively, the agent or broker can direct the consumer to **submit the change themselves** through HealthCare.gov or a Direct Enrollment (DE) or Enhanced Direct Enrollment (EDE) consumer platform.
- » Additionally, CMS implemented new login functionality **requiring agents and brokers to use their own personal credentials** to log in to the CMS Portal. Agents and brokers must **reauthenticate their session every 12 hours.**

New System Updates to Agent/Broker-Assister Applications

System Updates to Direct Enrollment and Enhanced Direct Enrollment Pathways

- » In **October 2024**, CMS plans to update the Federal eligibility and enrollment system to only accept applications submitted by agents and brokers through Classic Direct Enrollment and Enhanced Direct Enrollment (DE/EDE) pathways that **include verifiable Social Security Numbers (SSNs)** for all applicants over 90 days old.
- » In **December 2024**, CMS plans to make additional updates to accept applications submitted by agents and brokers for noncitizen applicants who don't have SSNs but **provide verifiable immigration document information on the application.**
- » CMS expects that these system changes will greatly benefit consumers and agents and brokers by **reducing consumer burden** related to unauthorized enrollments, data matching issue (DMI) resolution, and tax filing issues.



Marketplace Consumers and SSNs

- » Almost all Marketplace applicants have SSNs, including U.S. citizens and **most noncitizens** who are eligible for Marketplace or Medicaid/CHIP coverage.
 - Deferred Action for Childhood Arrivals (DACA) recipients, who will be newly considered eligible for Marketplace coverage as of November 1, 2024, generally have SSNs.
- » There are certain noncitizens who are eligible for Marketplace coverage yet may not have SSNs.
Applicants without SSNs are still eligible for Marketplace coverage, if otherwise eligible.



REMINDER: Agents have always been required to provide SSNs on Marketplace applications for applicants who have them.

Applications Submitted by Agents and Brokers

- **Starting in October 2024*:**

- » If an agent or broker:

- uses an approved Classic DE or EDE website; and
- **does not provide an SSN** for an applicant (older than 90 days) **or** provides an SSN that CMS cannot verify...



...the application will be blocked from continuing.



- » An on-screen message will direct the agent or broker to conduct a three-way call with their client and the Marketplace Call Center.
 - The message will indicate that, alternatively, **the agent can assist their client with submitting the application themselves** through HealthCare.gov or through an approved Classic DE or EDE website.

**Dates are subject to change.*

Applications Submitted by Agents and Brokers (continued)



- **Starting in December 2024*:**

- » If an agent or broker uses an approved Classic DE or EDE website, agents and brokers working with noncitizen applicants (older than 90 days) who attest that they do not have an SSN **will not be immediately blocked** from moving forward. They will have the opportunity to provide the applicants' immigration documentation instead.
- » If an agent or broker **does not provide immigration document information** on the application for such noncitizen applicants, **or** provides information that CMS cannot verify in real time.



...the application will be blocked from moving forward.



- » An on-screen message will direct the agent or broker to conduct a three-way call with their client and the Marketplace Call Center.
 - The message will indicate that, alternatively, **the agent can assist their client with submitting the application themselves** through HealthCare.gov or through an approved Classic DE or EDE website.

**Dates are subject to change.*

Expectations for Agents and Brokers

- » Agents and brokers can:
 - **ask their clients whether they have and are willing to provide SSNs** for all members of their households who are seeking coverage before starting a Marketplace application;
 - explain to clients that providing SSNs for all Marketplace applicants who have them is **required by law**.
 - explain to clients that providing SSNs allows the Marketplace to confirm application information and **avoid having to provide follow-up documentation**.
- » For clients who do not have SSNs or are not willing to provide them, agents and brokers can:
 - **familiarize themselves with how their clients can create consumer accounts** to complete a Marketplace application on HealthCare.gov or an approved Classic DE or EDE website, so that they can provide "side-by-side" assistance.



Consumer Consent and Application Review Requirements

Documenting Consumer Consent Requirement



Consent Documentation Requirements

- » Agents, brokers, and web-brokers are required to document the receipt of consent from the consumer or their authorized representative.
 - The consumer or their authorized representative must take an action to produce the documentation;
 - The documentation must contain, at a minimum, the following information:
 - A description of the scope, purpose, and duration of the consent provided by the consumer or their authorized representative;
 - The date the consent was given;
 - The name of the consumer or their authorized representative;
 - The name of the agent, broker, web-broker, or agency being granted consent;
 - A process through which the consumer or their authorized representative may rescind the consent.
 - The agent, broker, or web-broker must maintain the documentation for **a minimum of 10 years.**

For more information on these requirements, view these FAQs here: <https://www.cms.gov/files/document/2024-pn-ab-faq-9823.pdf> **and webinar slides here:** <https://www.cms.gov/files/document/marketplace-compliance-2024-payment-notice-updates-webinar-slides.pdf>.

Documenting Application Review Requirement



Review Documentation Requirements

- » Agents, brokers, and web-brokers are required to document that eligibility application information has been reviewed by and confirmed to be accurate by the consumer or their authorized representative prior to application submission.
 - The consumer or their authorized representative must take an action to produce the documentation;
 - The documentation must contain, at a minimum, the following information:
 - The date the information was reviewed;
 - The name of the consumer or their authorized representative;
 - An explanation of the attestations at the end of the eligibility application; and
 - The name of the assisting agent, broker, or web-broker.
 - The agent, broker, or web-broker must maintain the documentation for **a minimum of 10 years**.

For more information on these requirements, view these FAQs here: <https://www.cms.gov/files/document/2024-pn-ab-faq-9823.pdf> **and webinar slides here:** <https://www.cms.gov/files/document/marketplace-compliance-2024-payment-notice-updates-webinar-slides.pdf>.

Consumer Scenario #1

Scenario: Angela, an agent in Ohio, is assisting a new client, Marco, apply for Marketplace coverage. Prior to assisting Marco, Angela obtains and documents Marco's consent.

Question #1: From the list of information documented in the consent below, which piece of information is **not** required to be included in consent documentation?

1. The date the consent was given
2. A process through which the consumer or their authorized representative may rescind consent
3. The date of birth of the consumer
4. The name of the consumer or their authorized representative
5. A description of the scope, purpose, and duration of the consent provided by the consumer or their authorized representative
6. The name of the agent, broker, web-broker, or agency being granted consent



Consumer Scenario #1

Scenario: Angela, an agent in Ohio, is assisting a new client, Marco, apply for Marketplace coverage. Prior to assisting Marco, Angela obtains and documents Marco's consent.

Question #1: From the list of information documented in the consent below, which piece of information is **not** required to be included in consent documentation?

1. The date the consent was given
2. A process through which the consumer or their authorized representative may rescind consent
- 3. The date of birth of the consumer**
4. The name of the consumer or their authorized representative
5. A description of the scope, purpose, and duration of the consent provided by the consumer or their authorized representative
6. The name of the agent, broker, web-broker, or agency being granted consent



NEW! Consumer Consent FAQs

- » Recently, CMS published **new consent and application review requirements FAQs** to the Agent & Broker FAQ website.
- » Agents and brokers have submitted insightful questions and feedback to **help CMS further clarify the requirements and develop helpful resources.**
- » These FAQs were developed to help answer questions most frequently asked by agents and brokers about the consent and application review requirements.



View the new consent and application requirements FAQs at:
<https://www.agentbrokerfaq.cms.gov/s/topic/0TOt0000000TUeLGAW/privacy-and-security-requirements>

» Topics covered in these FAQs include:

? When you need to document consumer consent

Provides examples of scenarios that require agents or brokers to obtain and document consumer consent prior to undertaking those activities, along with an explanation of scenarios where agents and brokers may be covered by prior consent documentation to that agent or broker that has already been obtained from the consumer.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/What-actions-on-behalf-of-a-Marketplace-consumer-require-me-to-obtain-and-document-their-consent>

? Acceptable methods of documenting the application review

Provides an explanation of the required factors which must be obtained to document the consumer's review and confirmation of the eligibility application information, along with the methods and formats that agents and brokers may use to document the consumer's review and confirmation of the eligibility application information.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/What-are-acceptable-methods-by-which-an-agent-or-broker-may-document-consumer-review-of-their-eligibility-application-information>

? Consent documentation requirements for conducting person searches

Provides clarification that consumer consent must be appropriately documented and must not be expired or have been rescinded in order for agents and brokers to conduct person searches and further clarifies that these requirements still apply even when Classic DE or EDE websites offer functionality to conduct person searches.

View this FAQs here: <https://www.agentbrokerfaq.cms.gov/s/article/Can-I-conduct-a-person-search-for-someone-prior-to-obtaining-their-consent>

? An explanation of documenting the required explanation of the attestations

Provides an in-depth explanation of how agents and brokers must document that the attestations at the conclusion of the eligibility application have been reviewed by and confirmed by the consumer.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/What-attestations-do-I-need-to-explain-to-the-consumer>

? Consumer consent and the Marketplace Call Center

Provides an explanation of how the documentation requirements for consumer consent and review of the eligibility application apply when working with the Marketplace Call Center to enroll a consumer, as well as the separate and additional authorization requirements for enrolling a consumer via the Marketplace Call Center.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/Does-consumer-consent-need-to-be-obtained-if-I-am-speaking-with-the-Marketplace-Call-Center-on-the-consumer-s-behalf>

? Requirements for consumers' authorized representatives

Provides an explanation of how the consumer consent and eligibility application documentation requirements apply when the consumer has delegated an authorized representative to work with an agent or broker on their behalf, along with the consumer requirements for legally assigning an authorized representative.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/Is-a-consumer-s-authorized-representative-able-to-provide-consent-and-review-and-confirm-the-eligibility-application-information-on-behalf-of-the-consumer>

? **When a consumer's eligibility application has been changed by another agent or broker**

Provides an explanation of the steps agents must take prior to reverting changes made to a consumer's application by another agent or broker, including verifying if the consumer authorized those changes and documenting that the consumer reviewed and confirmed the accuracy of their eligibility application information.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/What-if-the-eligibility-application-of-a-consumer-I-have-consent-to-work-with-was-changed-by-another-agent-broker-web-broker-or-agency>

? **What to submit when CMS asks for consumer consent documentation**

Provides an explanation of suitable forms of documentation that may be provided to CMS upon request of consumer consent documentation, as well as what actions agents and brokers will need to take to supplement their documentation if that documentation does not provide sufficient proof that the consumer took action to provide consent.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/What-do-I-need-to-submit-when-CMS-asks-for-documentation-of-consumer-consent>

? **When consumer consent obtained by an agent or broker may apply to all agents and brokers with an agency**

Provides clarification on when consumer consent obtained by an agent or broker within an agency may apply to all agents and brokers within that agency, including the required elements the consent documentation must contain and how other agents' and brokers' names and NPNs should be listed on the consumer's application.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/If-the-consumer-consent-obtained-and-documented-by-an-agent-or-broker-provides-consent-to-the-agent-or-broker-s-agency-would-that-consent-apply-to-all-agents-and-brokers-within-the-agency>

? **Reminder that consumer consent never authorizes agents and brokers to access a consumer's account**

Provides a reminder of the prohibitions in the Privacy and Security Agreements forbidding agents and brokers from accessing a consumer's HealthCare.gov account and that consumer consent documentation must not indicate that the consumer would allow the agent or broker to access their account or create an account for the consumer.

View this FAQ here: <https://www.agentbrokerfaq.cms.gov/s/article/If-a-consumer-grants-an-agent-or-broker-consent-to-enroll-them-in-a-qualified-health-plan-through-the-Marketplace-does-that-authorize-the-agent-or-broker-to-access-their-HealthCare-gov-account>



Have you viewed the new consent and application review requirements FAQs CMS published in June?

1. Yes
2. No
3. Unsure

Marketing and Advertising in the Marketplace

Compliant Practices for Marketing and Advertising in the Marketplace

- » **Refrain from misleading consumers.**
 - Ensure you are not using marketing and advertising efforts that could mislead or confuse consumers.
- » **Do not misrepresent your role to consumers.**
 - You may not imply that you represent or are employed by CMS, the Marketplace or HealthCare.gov, or are calling on behalf of these organizations.
- » **Provide accurate information.**
 - You may not provide consumers with inaccurate information or omit relevant information about qualified health plans (QHPs), federal premium tax credits, or cost-sharing subsidies.



Misleading Marketing and Advertising

- » **You may not create marketing that is misleading or coercive**, which includes making any misrepresentation of your role, connections, or employment within the Marketplace or CMS as determined by federal laws and regulations.
- » You may say you are a state licensed Marketplace-registered agent or broker selling Marketplace plans, but **you must not imply that you represent or are employed by CMS**, the Marketplace, [HealthCare.gov](https://www.healthcare.gov), an insurance company you are not actually associated with, or are advertising on behalf of these organizations.
- » You must ensure potential pricing of health plans and plan benefits is **accurately represented** in advertisements.



Do's and Don'ts of Advertising and Marketing



DO

- Provide accurate information on Marketplace plans, benefits, and savings, if applicable.
- Ensure you have compliant documentation of consent from the consumer to provide them with enrollment assistance prior to facilitating enrollment for the consumer (including a person search) even if you are connected with the consumer by a third party.
- Ensure you have compliant documentation of consumer review and confirmation of the eligibility application prior to submitting an enrollment for a consumer even if you are connected to the consumer by a third party.
- Tell consumers they **may** qualify for Marketplace coverage and help them get a quote or eligibility determination from the Marketplace (after receipt and documentation of compliant consent to facilitate enrollment for the consumer).



DON'T

- Say you represent or are employed by CMS, the Marketplace, HealthCare.gov, or an issuer, or misrepresent your role with an issuer.
- Mislead consumers about rewards or discounts for enrolling in Marketplace coverage, including through the advertisement of gift cards or other enrollment incentives which may not be applicable to all consumers without accurately describing the qualifications for such incentives.
- Guarantee free or low-cost plans to consumers as not all consumer may not qualify for these plans.
- Engage in misleading or coercive marketing. If you're using a third party, we *strongly recommend* that you confirm their marketing and advertising is not misleading or coercive.

Purchasing Consumer Leads



- » When working with third parties, such as lead generators, to locate consumers, agents and brokers are strongly encouraged to:
 - ✓ Understand **how the company is generating leads**.
 - ✓ Investigate that third party's creative materials to ensure they **do not mislead or confuse potential clients** in any way.
 - ✓ Understand **how the company prices and sells leads** to avoid purchasing a lead that has been sold to multiple agents or brokers, which may lead to consumer confusion in multiple agents and brokers attempting to enroll them.
- » Any third parties with whom you are contracted must adhere to requirements concerning the use and disclosure of PII.

When using information purchased from lead generating companies, remember to **obtain and document consent from the consumer and keep a record of this consumer consent for a minimum of 10 years**.

Consumer Scenario #2

Scenario: Darius, an agent in Vermont, recently purchased leads from a lead generating agency. To further understand the history of the consumers he plans to reach out to, Darius would like to search to see if these consumers have any existing Marketplace applications.

Question #1: Does Darius need to obtain and document consent from the consumers listed in his leads prior to searching for existing applications?

1. Yes
2. No



Consumer Scenario #2

Scenario: Darius, an agent in Vermont, recently purchased leads from a lead generating agency. To further understand the history of the consumers he plans to reach out to, Darius would like to search to see if these consumers have any existing Marketplace applications.

Question #1: Does Darius need to obtain and document consent from the consumers listed in his leads prior to searching for existing applications?

1. Yes
2. No

Explanation: You must always obtain and document the consumer's consent prior to checking for existing applications, even for those consumers whose information was obtained through a lead generating company. Darius will need to reach out to these consumers and obtain and document their consent before he can check if they have existing Marketplace applications.



Security and Privacy Concepts and Principles

Why is Privacy Important?



» **To earn and keep public trust.**

- If the public no longer trusts CMS to protect their PII, we may find public support for CMS programs will erode.

» **To prevent identity theft.**

- Identity thieves do not discriminate based on a person's immigration status, and neither does CMS when protecting the PII it collects and maintains.

» **To prevent privacy incidents.**

- Incidents are reported in national news, which erodes the public's trust in those agencies, and are expensive to mitigate.

» **It's the law.**

- Failure to follow these laws may result in civil or criminal penalties for you, your supervisors, and/or colleagues
- Disciplinary action for failure to comply with CMS security and privacy policies
- Any who knowingly and willfully discloses protected Privacy Act information in any manner to any person or agency not entitled to receive it, is subject to criminal and civil penalties under the Privacy Act

Security vs. Privacy

Privacy



- » The right of individuals to control or influence information that is related to them in terms of who may collect or store it and to whom that information may be disclosed.

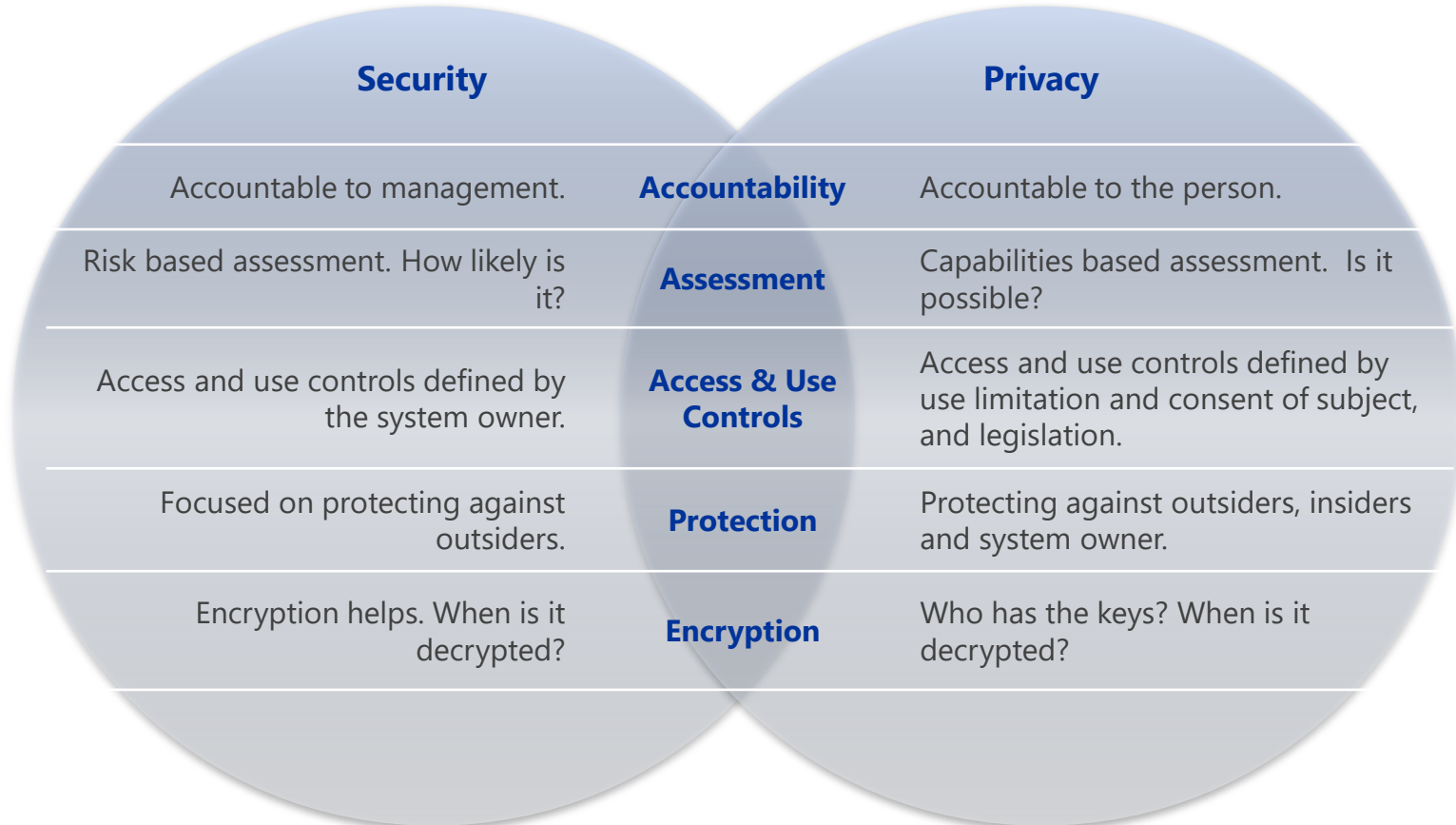
Submit required documents



- » Procedures that protect organizational resources, employees and peers, paper or electronic media, hardware, software and networks from damage, theft, interruption, or change

Security is the mechanism by which privacy information is protected

Security and Privacy Relationship



Protecting Personally Identifiable Information (PII)

Personally Identifiable Information (PII)



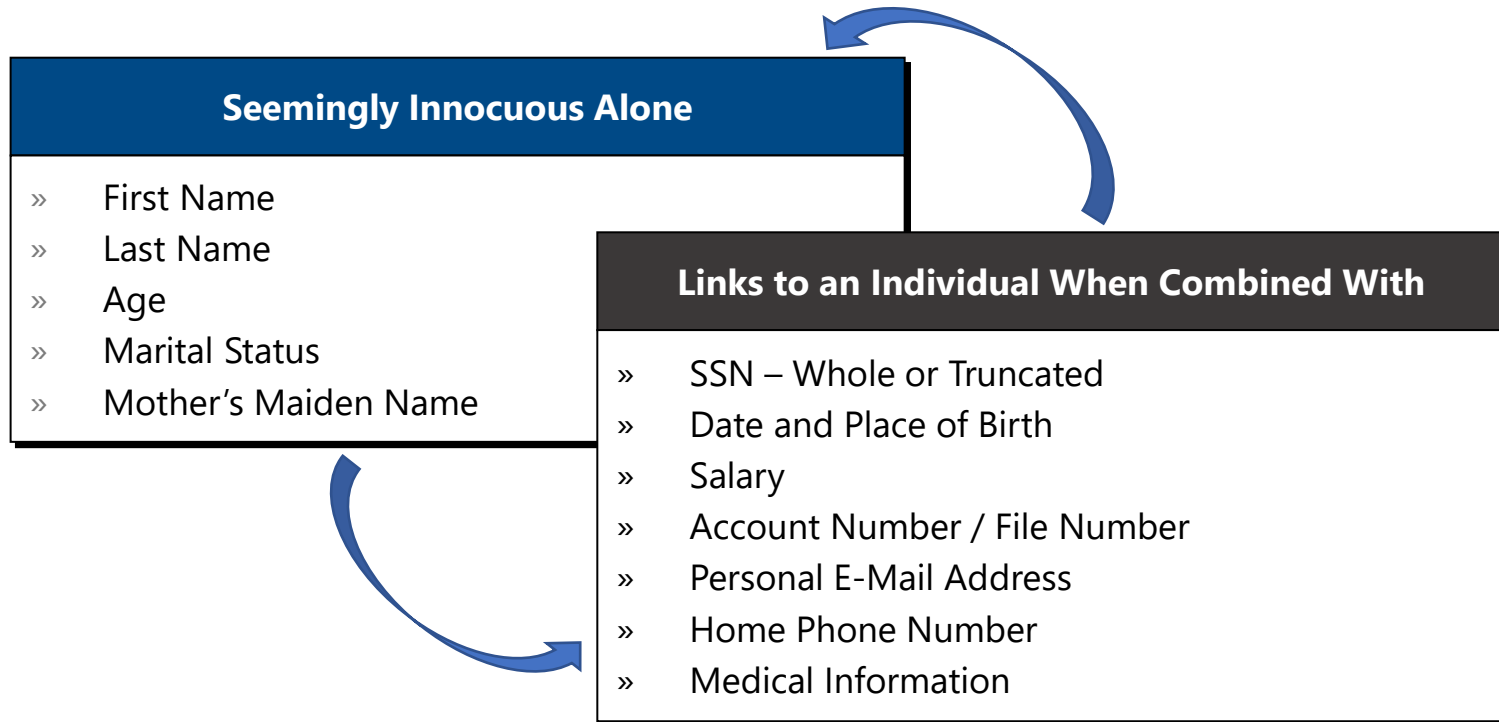
- » Personally identifiable information refers to **information which can be used to distinguish or trace an individual's identity**, such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information **which is linked or linkable to a specific individual**, such as data and place of birth, mother's maiden name, etc.

- » Information which can be used to distinguish or trace an individual's identity, such as their:
 - name
 - Social Security number
 - date and place of birth
 - mother's maiden name
 - biometric records
 - any other personal information, which is linked or linkable to an individual

- » Any information about an individual including, but not limited to:
 - education
 - financial transactions
 - medical history
 - and criminal or employment history

The Mosaic Effect

- » The **Mosaic Effect** is when seemingly innocuous information is combined to create PII.



Examples of PII Incidents

- » Theft of a laptop containing rosters of emergency responders.
- » Lost or stolen thumb drive or portable hard drive of system processing PII.
- » Shipper loses a package of containing consumer PII.
- » Loss of a hard drive with client PII.
- » Unauthorized access to client data files.
- » Email containing client information transmitted for official business is sent unencrypted.
- » Email containing client information transmitted from a business or corporate email account to a personal email account.
- » Key logger gains access to a computer and its accounts.



NOTE: Suspected or confirmed loss of PII must be reported to the CMS IT Service Desk
within one hour of discovery.



Obligation to Protect PII

- » Apply a “need to know” principle before disclosing PII to other personnel.
- » Challenge the requested need for PII before sharing.
- » Limit PII to official use only.
- » PII may only be collected for an authorized purpose.



The Security and Privacy Agreement



- » Remember, the Agent/Broker is bound by the requirements found in the ABE Security and Privacy Agreement (excerpt):

“

Duty to Protect PII: ABE shall not release, publish, or disclose Consumer, Applicant, Qualified Individual, or Enrollee PII to unauthorized personnel, and shall protect such information in accordance with provisions of any applicable laws and regulations governing the adequate safeguarding of Consumer, Applicant, Qualified Individual, or Enrollee PII, the misuse of which carries with it the potential to cause financial, reputational and other types of harm.

- » *ABE agrees to comply with all federal laws and regulations regarding the handling of PII—regardless of where the organization is located or where the data are stored and accessed.*
- » *ABE's Rules of Behavior must be at least as stringent as the HHS Rules of Behavior.*
- » *ABE understands and agrees that all financial and legal liabilities arising from inappropriate disclosure or Breach of Consumer, Applicant, Qualified Individual, or Enrollee PII while such information is in the possession of ABE shall be borne exclusively by ABE.*
- » *ABE shall train and monitor staff on the requirements related to the authorized use and sharing of PII with third parties and the consequences of unauthorized use or sharing of PII, and periodically audit their actual use and disclosure of PII.*

”

Key Takeaways



CMS has implemented new system changes to fight unauthorized activities, protect consumers, and protect agents and brokers who work hard to compliantly assist their clients.



Ensure you always document the consumer's consent and their confirmation of the accuracy of their eligibility application information to ensure their eligibility information and plan selections are accurate and that you remain compliant.



Avoid misleading consumers and, if using third-party entities to obtain consumer leads, agents and brokers should investigate the marketing practices of those entities.



Help prevent fraudulent activity by securing your clients' PII and never sharing it with unauthorized individuals.



Your efforts in maintaining compliant practices when assisting consumers in the Marketplace help continue to grow Marketplace enrollments and expand consumer access to healthcare coverage.

Acronym Definitions



Acronym	Definition
CCIIO	Center for Consumer Information and Insurance Oversight
CEU	Continuing Education Unit
CMS	Centers for Medicare & Medicaid Services
DE	Direct Enrollment
EDE	Enhanced Direct Enrollment
FFM	Federally-facilitated Marketplace
HHS	Department of Health & Human Services
IDM	Identity Management System
LOA	Line of Authority
MFA	Multi-Factor Authentication
MLMS	Marketplace Learning Management System

Acronym	Definition
NIPR	National Insurance Producer Registry
NPN	National Producer Number
OEP	Open Enrollment Period
RCL	Registration Completion List
SBM	State-based Marketplace
SBM-FP	State-based Marketplace on the Federal Platform
SHOP	Small Business Health Options Program
QHP	Qualified Health Plan



Agents and brokers are valued partners to all of us at CMS for the vital role you play in enrolling consumers in qualified health coverage.

We thank you for the trusted advice, support, and assistance you provide throughout the year and wish you continued success during this OEP and beyond!