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Title: Operational Tips for Agents/Brokers in the Federally-facilitated Marketplaces (FFMs)

Date: January 22, 2016

## **QUESTIONS FROM AGENTS/BROKERS ABOUT CONSUMER ENROLLMENT FOR PLAN YEAR 2016**

Q1: How may agents and brokers assist with enrollments?

A1: Agents and brokers in the Individual Marketplace are able to assist consumers via two pathways: (a) the Direct Enrollment Pathway (also known as issuer-based enrollment), through which an agent or broker uses a qualified health plan (QHP) issuer's or web-broker's website to assist the consumer; and (b) via the Marketplace Pathway (also referred to as the "side-by-side" pathway), through which an agent or broker assists the consumer using the HealthCare.gov website. Both pathways transmit an agent's or broker's identifying information to the appropriate QHP issuer to facilitate the QHP issuer's compensation to the agent or broker for each enrollment transaction. Either pathway allows an agent or broker to assist qualified individuals with annual enrollment. More information about each pathway is included in our January 8, 2016 guidance, located at: [https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/Role-of-ABs-in-Marketplace-1\\_6\\_16.pdf](https://www.cms.gov/CCIIO/Programs-and-Initiatives/Health-Insurance-Marketplaces/Downloads/Role-of-ABs-in-Marketplace-1_6_16.pdf).

The Small Business Health Options (SHOP) Marketplace also has online application and enrollment capabilities, and a portal for agents and brokers to assist their SHOP Marketplace clients at [HealthCare.gov](http://HealthCare.gov). In the SHOP Marketplace, agents and brokers have direct access through the SHOP Agent/Broker Portal to authorized employer application information, enrollment, and case management functions.<sup>1</sup> Agents and brokers working with the SHOP Marketplace are able to directly access the SHOP Marketplace system through [HealthCare.gov](http://HealthCare.gov), or by accessing the following direct link: <https://healthcare.gov/marketplace/small-businesses/agent>.

Q2: What is the Marketplace 2.0 Application?

A2: The Marketplace 2.0 Application, which is sometimes referred to as the streamlined application, allows Individual Marketplace consumers to navigate through fewer screens than the original classic application requires, is optimized for mobile devices, and allows for backward navigation. It provides for a more dynamic process by limiting the questions an applicant needs to answer

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<sup>1</sup> Each employer must create its own [HealthCare.gov](http://HealthCare.gov) account. After logging in to its account, the employer can provide an authorization to an agent or broker to assist it and its qualified employees with the QHP enrollment process through the SHOP Marketplace. An agent or broker cannot gain access to the employer's account and its respective employees' application information until such authorization is provided.

through the use of screening questions. Its use is limited to new applicants with simpler household situations.

Q3: Will National Producer Numbers (NPNs) be captured by the new Marketplace 2.0 Application?

A3: Yes, on the screen titled “Continue your application,” consumers are asked to submit household contact information. Between the fields for “Household contact information” and “Home address,” a checkbox displays with the label “Another person is helping me complete my application.” Clicking that checkbox will produce a new set of fields, including one labeled “ID number.” The “ID number” field is where an NPN may be entered.

Below are the two screenshots at this phase in the Marketplace 2.0 Application. Screenshot A3.1 appears prior to clicking the checkbox, and Screenshot A3.2 appears after clicking the checkbox.

Screenshot A3.1: Where to click the checkbox to enter an NPN in the Marketplace 2.0 Application

**Continue your application**  
After you complete this section, you'll answer a few more questions before you compare plans.

**Household contact information**  
These fields are optional: middle name, suffix, and preferred written and spoken languages.

First name Middle Last name Suffix

Email address Phone number Home

Preferred written language Preferred spoken language  
English English

Go paperless! Get your notices by email, instead of paper copies in your mailbox.

Another person is helping me complete my application.

**Home address**  
Enter the permanent address where everyone on your application lives. The apt./ste. # field is optional.

Street address Apt./Ste. #

City Kansas ZIP code

### Screenshot A3.2: Where to enter an NPN in the Marketplace 2.0 Application

**Continue your application**  
After you complete this section, you'll answer a few more questions before you compare plans.

**Household contact information**  
These fields are optional: middle name, suffix, and preferred written and spoken languages.

First name Middle Last name Suffix

Email address Phone number Home

Preferred written language Preferred spoken language  
English English

Go paperless! Get your notices by email, instead of paper copies in your mailbox.

Another person is helping me complete my application.

First name Middle Last name Suffix

Select type Organization name **ID number**

**Home address**  
Enter the permanent address where everyone on your application lives. The apt./ste. # field is optional.

Street address Apt./Ste. #

Q4: Does the Direct Enrollment Pathway support the Marketplace 2.0 Application?

A4: Yes, the Marketplace 2.0 Application is accessible for new applicants who are using either the Direct Enrollment Pathway or the Marketplace/Side-by-Side Pathway.

Q5: Does the Direct Enrollment Pathway support reenrollments during Open Enrollment?

A5: Yes, agents and brokers using the Direct Enrollment Pathway have the option to search for a consumer's prior plan year application and then create a new application that will be prepopulated with information from the prior plan year. In addition, agents and brokers using the Direct Enrollment Pathway have the ability to search for existing applications, view consumers' My Account pages, and prepopulate new plan year applications. If agents and brokers prefer, they are also able to start a new application for a consumer without prepopulating information from a prior plan year's application. Similar to the Marketplace Pathway, consumers who had coverage in the prior plan year may be reenrolled via the Direct Enrollment Pathway into the same coverage plan or may be reenrolled in a similar, "cross-walked" coverage plan.

Q6: Does the Direct Enrollment Pathway support changes in circumstances (CiCs) and special enrollment periods (SEPs)?

A6: Yes, consumers can log in to HealthCare.gov or provide updates via web-broker websites to submit CiC information, if approved for an SEP, enroll or change their enrollment. Consumers may change plans throughout the Open Enrollment period via the Marketplace Pathway or the Direct Enrollment Pathway.

Q7: What is the difference between a “passive reenrollment” and an “active reenrollment”?

A7: Reenrollment can be “passive” in the case of an enrollee in current status who did not return to the Marketplace by December 17, 2015 to make a 2016 QHP selection. In this case, the Marketplace sent the issuer for the plan in which the consumer is enrolled in plan year 2015 an enrollment for plan year 2016 based on the reenrollment plan submitted by the issuer. Alternatively, enrollees were able to make an “active” 2016 QHP selection by coming to the Marketplace to submit a 2016 application with updated eligibility information and by completing plan selection.

Enrollees whose policies were in current status as of December 2015; had no future terminations effective before December 31, 2015; and who did not make a 2016 QHP selection were eligible for automatic reenrollment, or “passive reenrollment.” The Marketplace sent passive reenrollment transactions to issuers after December 17, 2015 for current enrollees who did not actively select a 2016 plan via the Marketplace before 2:59 PM Eastern Time December 18, 2015 (11:59 PM Pacific Time December 17, 2015.)

Enrollees whose Marketplace coverage ended prior to December 2015, including for nonpayment of premiums, were not eligible for passive reenrollment, but were able to actively select 2016 coverage during the 2015 Open Enrollment period under guaranteed availability.

Q8: Where is the NPN captured during the application and enrollment process? How can a prepopulated NPN be changed during a reenrollment?

A8: An NPN can be captured in multiple ways and at different times in the process. The specific location where the NPN is captured depends on the following factors:

- Reenrollment type (i.e., passive or active)
- Enrollment Pathway (e.g., Direct Enrollment or Marketplace)
- Application form (e.g., Marketplace 2.0 Application or classic application)
- Timing of the NPN entry (e.g., during the eligibility application process or during the plan selection process)

#### **Passive Reenrollment**

If a consumer is passively reenrolling or being automatically reenrolled, and the consumer’s prior year application included an NPN, then that NPN will prepopulate in the current year’s application and be eligible for compensation for the enrollment.

**Direct Enrollment – Including Active Reenrollment or New Applications:** If using the Direct Enrollment Pathway, an agent or broker will log in directly to an issuer’s or web-broker’s website. In the Direct Enrollment Pathway, no manual entry of an NPN is required. Instead, the NPN and identifying information of the agent or broker is electronically captured via the log in information and will be submitted to the issuer. This is true even if the consumer is submitting a reenrollment and had received assistance from an agent or broker with a different NPN in the prior plan year. The NPN and identifying information of the agent or broker assisting with the more current enrollment will be electronically captured via the log in information and will be submitted to the issuer.

**Marketplace Pathway – Active Reenrollment:** There are two points where the consumer using the classic application can enter or update an NPN during a Marketplace Pathway reenrollment. First, when reviewing the eligibility application, the consumer will encounter a screen with the heading “Help applying for coverage.” Below the heading, “Tell us if you’re getting help from one of these people” will be displayed. If the consumer entered an NPN in the prior plan year, the NPN will be prepopulated and may be updated. If the consumer is receiving assistance from an agent or broker for the first time, the NPN and other relevant information may be entered on this screen. Screenshot A8.1 appears at this phase in the Marketplace application.

Screenshot A8.1: “Agent or broker” radio button to tell if the consumer received help

**Help applying for coverage**

Tell us if you're getting help from one of these people

- Navigator
- Certified application counselor
- Non-Navigator assistance personnel
- Agent or broker
- None of these people

First name      Middle *optional*      Last name      Suffix *optional*

                 Select... ▾

Organization name *optional*      ID number *optional*

    

FFM User ID *optional*      NPN number

    

The second opportunity to enter an NPN in the classic application will present itself to the consumer during plan selection. A hyperlink will display stating, “Is a new or different assistor helping you with your enrollment?” Clicking on the link opens a window titled “Help applying for coverage,” which includes a drop-down box where the consumer can select the “Agent or broker” radio button. After making that selection, the consumer may enter the agent’s or broker’s NPN and other relevant information. Please note that the NPN entered during plan selection will be the one eligible for compensation, regardless of what appears on the eligibility application.

Below are the three screenshots that appear at this phase in the Marketplace application. Screenshot A8.2 appears prior to clicking the “Is a new or different assistor helping you with your enrollment?” hyperlink, and Screenshots A8.3 and A8.4 appear after clicking the hyperlink.

Screenshot A8.2: Hyperlink to add or change agent/broker NPN during plan selection

**Confirm your plan choices**

You must confirm your plan choices below in order to enroll.

To change the tax credit amount you want to use each month, return to the [To-Do List](#) and select "change" next to the set ppremium tax credit task.

**Blue Value Silver**  
Plan ID: 46944AL0410001  
Health plan for Suzanne Carson  
John Carson

Health Plan Monthly Premium **\$603.10**  
Premium tax credit **\$418.28**  
Health Plan Monthly Premium **\$184.82**

Estimated Effective Date 09/01/2014

**CHANGE SELECTION**

**Blue Value Silver**  
Plan ID: 46944AL0410001  
Health plan for Anna Carson

Health Plan Monthly Premium **\$120.32**  
Premium tax credit **\$86.72**  
Health Plan Monthly Premium **\$33.60**

Estimated Effective Date 09/01/2014

**CHANGE SELECTION**

[Is a new or different assistor helping you with your enrollment?](#)

**You can change effective dates.**  
[Learn more](#) about your dates of coverage.

**CHANGE EFFECTIVE DATE**

**Total: \$218.42**  
Monthly premium total (with tax credit)

I understand that I will lose my premium tax credit if I'm found eligible for other minimum essential coverage, like coverage through my job or Medicare. I also understand that if I don't contact the Marketplace about my eligibility for other coverage, I will lose my coverage through the Marketplace.

**CONFIRM**



contact information” is requested. Between those fields and the “Home address” fields below, a checkbox displays with the label, “Another person is helping me complete my application.” Clicking the checkbox will produce a new set of fields, including one labeled “ID number,” which is where the NPN may be entered. See Screenshots A3.1 and A3.2 above.

As with reenrollments using the classic application, the second opportunity to enter an NPN will present itself during plan selection. A hyperlink will display stating, “Is a new or different assistor helping you with your enrollment?” Clicking on the link will produce a window titled “Help applying for coverage” that includes a drop-down box where agent or broker may be selected. After making that selection, the consumer may enter the NPN and other relevant information. Please note that the NPN entered during plan selection will be the one eligible for compensation regardless of what appears on the eligibility application. See screenshots A8.2-A8.4 above.

Q9: Which NPN is sent to the issuer for an FFM enrollment? If I helped someone enroll last year, will my NPN remain on the transaction if they reenroll this year?

A9: The NPN that is submitted for an FFM enrollment depends on the following factors:

- Enrollment Pathway (e.g., Direct Enrollment or Marketplace Pathway)
- Reenrollment Type (e.g., passive or active)
- Location of NPN Entry (e.g., entered on the eligibility application or during plan selection)
- Actions Consumers Take (e.g., adding, removing, or modifying an NPN)

The following rules dictate which NPN is sent to an issuer for an FFM enrollment, including reenrollments.

1. If using the Direct Enrollment Pathway, an agent or broker will log in directly to an issuer’s or web-broker’s website. In this case, no entry of the NPN is required. Even if the consumer is reenrolling and receiving assistance from an agent or broker with a different NPN than he or she worked with for a prior plan year, the code underlying the Direct Enrollment login will determine the NPN eligible for compensation for the current plan year enrollment.
2. If a consumer is passively reenrolling, and the consumer’s prior plan year application included an NPN, then that NPN will prepopulate in the current plan year application and will be the NPN eligible for compensation for the enrollment.
3. If using the Marketplace Pathway, a consumer completing a new application or actively reenrolling may enter or edit the NPN on the eligibility application or during plan selection (locations described in Answer 8 above). If reenrolling and the consumer’s application for the prior plan year included an NPN, that NPN will be prepopulated in the consumer’s current plan year application. A consumer may edit a prepopulated NPN or enter an NPN in both or either locations. However, if an NPN is entered during plan selection, that NPN will be the one eligible for compensation for the enrollment.

Q10: What registration status is required for an agent or broker to be compensated for Marketplace reenrollments?

A10: There are three important aspects to highlight in this response.

**Overall:** Agents and brokers may be compensated for Marketplace transactions if they were registered at the time they provided assistance to consumers. Note that if agents or brokers completed registration for a prior plan year, but did not have an active registration status when they assisted consumers with current plan year enrollments, issuers should NOT compensate those agents or brokers for the current plan year active enrollments.

**Reenrollment without Agent/Broker Assistance:** If a consumer passively reenrolled or is actively reenrolling without the assistance of an agent or broker, and the consumer's prior year application included an NPN, that same NPN will be populated into the current plan year application and be transmitted to the issuer. If the agent or broker had completed a prior plan year registration at the time he or she assisted the consumer with that plan year's Marketplace transaction, but did not complete the current plan year registration by the time the reenrollment occurs without the agent's or broker's assistance, the issuer has the discretion to compensate the agent or broker for the reenrollment according to the terms of the compensation arrangement it holds with the agent or broker.

**Reenrollment with Agent/Broker Assistance:** For reenrollments through the Direct Enrollment Pathway or the Marketplace Pathway, where an agent or broker provides assistance to a consumer, the NPN will be submitted as described above. An issuer may compensate an agent or broker for a reenrollment according to the terms of a compensation arrangement it holds with an agent or broker ONLY IF the agent or broker has an active registration status at the time he or she assisted the consumer.

Q11: I don't believe the FFM has captured my NPN on a specific enrollment. What should I do?

A11: If you have a legitimate reason to believe your NPN should have been included on an enrollment transaction, please contact the respective QHP issuer directly to discuss the situation. Please note that only agents and brokers who have completed the FFM registration requirements for their respective Marketplace(s) may be credited for FFM enrollments.

## QUESTIONS FROM AGENTS/BROKERS ABOUT REGISTRATION AND GENERAL PROGRAM INFORMATION

Q12: How can I verify that I completed the appropriate FFM agent and broker registration requirements?

A12: There are two ways you can verify that you have successfully completed FFM registration.

- You can check the Agent and Broker FFM Registration Completion List available on the Center for Consumer Information & Insurance Oversight's (CCIIO's) Agents and Brokers Resources webpage at: <http://go.cms.gov/CCIIOAB>. There are separate lists for each plan year, each of which includes the NPN for all agents and brokers that have completed the FFM registration process for that plan year.

**Tip:** Open the list and check your registration status by searching for your NPN. To find your NPN, select the "Ctrl" and "F" keys simultaneously on your keyboard (i.e., the "Find" feature in Microsoft Excel) and type in your NPN. You can also sort by your NPN by navigating to the NPN column, selecting the drop-down list, and entering your NPN in the search field. Please

note that the Registration Completion List is updated on this site twice each month. As a result, there may be delay in your NPN appearing on the list if you complete training or registration after the list has been updated for the month.

- You may also check your registration status by logging into the [CMS Enterprise Portal](#) and viewing the “Agent Broker Registration Status Page.”

The Registration Completion List is also available for issuers that are registered with the CMSzONE Private Issuer Community here: <https://zone.cms.gov/document/agent-and-broker-federally-facilitated-marketplace-ffm-registration-completion-list>. Please note that CMSzONE Private Issuer Community is for issuers only. Issuers must be registered and log in to CMSzONE to access the list. CMS plans to update the Registration Completion List weekly and post it to this site by Friday morning.

Q13: When will I receive my FFM registration number? When will I be assigned my FFM number?

A13: There are no “FFM registration numbers” and you will not be assigned an FFM registration number. You created your FFM User ID when you created your account on the CMS Enterprise Portal during the agent/broker registration process. If you have forgotten your FFM User ID or password information, click on the “Forgot my User ID/Password” link on the CMS Enterprise Portal log-in webpage at: <https://portal.cms.gov/>.

Q14: Where can I get more information about being an agent or broker in the FFM?

A14: To learn more about being an agent or broker in the FFM, please visit: <http://go.cms.gov/CCIOAB>. There are a number of links and documents on those webpages that will help you learn more about the roles of agents and brokers in the FFM.