Agents and Brokers: Frequently Asked Questions for How to Ensure You Get Credit for Assisting with Annual Re-enrollments

The Centers for Medicare & Medicaid Services (CMS) often receives questions from agents and brokers who want to ensure they get credit for assisting a consumer who re-enrolls in Marketplace coverage during the annual Open Enrollment period. Having your National Producer Number (NPN) on your clients’ Marketplace re-enrollment applications will ensure issuers can identify you as assisting consumers with re-enrollments in order to pay commissions. This Frequently Asked Questions document is intended to help you understand the different scenarios that affect the addition or retention of your NPN on a Marketplace re-enrollment transaction.

**Remember:** The Marketplace\(^1\) does not directly appoint or compensate agents or brokers. Agents and brokers who participate in the Marketplace receive compensation directly from their affiliated qualified health plan (QHP) issuers in accordance with their agreements with those issuers and any applicable state-specific requirements. If you have reason to believe you should receive renewal compensation for a Marketplace re-enrollment, but did not, you may contact the respective QHP issuer directly to discuss the situation.

**Active Re-enrollment via HealthCare.gov:** How do I record my NPN when I personally help my client update his or her eligibility information at HealthCare.gov and make a plan selection?

During the annual Open Enrollment period, your client should log in to his or her existing HealthCare.gov account to access a pre-populated application for the applicable plan year. You or your client should then select the “Report a Life Change” option to update the client’s eligibility information and plan selection for the following year (even if the client is planning to re-enroll in the same plan).

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\(^1\) When used in this document, the term "Marketplace" includes Federally-facilitated Marketplaces (FFMs) and State-based Marketplaces on the Federal Platform (SBM-FPs).
Your name and NPN should be entered or updated on a client’s re-enrollment when prompted during this process to indicate that you provided assistance and to ensure your information will persist on the enrollment transaction. If your client worked with a different agent or broker last year, the pre-populated application may contain the previous agent’s or broker’s NPN. You or your client should update all information that is pre-populated (e.g., the agent's or broker’s name and NPN) as may be appropriate.

**Remember:** Remind your clients to make sure your name and NPN stays on their re-enrollment application if they access it through HealthCare.gov on their own. **Note that if your NPN is not entered, you may not receive credit for the re-enrollment.**

### Active Re-enrollment via Classic Direct Enrollment: Will my NPN be recorded if I assist clients to re-enroll via the Classic Direct Enrollment Pathway?

Yes. If you are affiliated with QHP issuers or web-brokers that offer the Classic Direct Enrollment Pathway, you may use that pathway to connect to an agent/broker landing page at HealthCare.gov through the QHP issuer’s or web-broker’s website to help your clients update their eligibility information and actively select, or re-enroll in, a health plan.

You must use the Agent/Broker Application Search Tool, available from the agent/broker landing page at HealthCare.gov, to search for and access your client’s pre-populated application for the applicable plan year. Once you locate the right application, select the “Report a Life Change” option to update the client’s eligibility information and plan selection for the following year (even if the client is planning to re-enroll in the same plan).

In the Classic Direct Enrollment Pathway, your name and NPN are electronically transmitted to the issuer when the consumer’s re-enrollment is submitted in accordance with how the Direct Enrollment account was set up by the respective issuer or web-broker. As a best practice, you should also enter or update your name and NPN on your client’s re-enrollment application, using the same screens and fields as described in Question 1 above.

### Active Re-enrollment via Classic Direct Enrollment: Can I use the Classic Direct Enrollment Pathway to assist a client to re-enroll if that individual used HealthCare.gov to enroll in a previous year?

Yes. As described above in Question 2, in the Classic Direct Enrollment Pathway, you must use the Agent/Broker Application Search Tool to search for and access your client’s pre-populated application for the applicable plan year. Your name and NPN are electronically transmitted to the issuer when the consumer’s re-enrollment is submitted in accordance with how the Direct Enrollment account was set up by the respective issuer or web-broker. As a best practice, you should also enter or update your name and NPN on your client’s re-enrollment application, using the same screens and fields as described in Question 1, above.

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2 The Classic Direct Enrollment Pathway uses the double redirect to and from HealthCare.gov to submit the consumer’s application and get an eligibility determination.
Active Re-enrollment via Enhanced Direct Enrollment: ³ Will my NPN be recorded if I assist clients to re-enroll via the Enhanced Direct Enrollment Pathway?

If you are assisting consumers via the Enhanced Direct Enrollment Pathway, the issuer or web-broker operating that pathway is responsible for electronically transmitting your name and NPN to the issuer as part of the enrollment. However, if the issuer or web-broker allows you to manually enter your name and NPN on your client’s re-enrollment application when using the Enhanced Direct Enrollment Pathway, you should always do so as a best practice.

Active Re-enrollment via Marketplace Call Center: Can my NPN be recorded if my client needs to use the Marketplace Call Center to complete a re-enrollment?

Yes. Certain complex consumer situations may require you and your client to seek support from the Marketplace Call Center to complete a re-enrollment. You may conduct a three-way, toll-free call with your client and the Marketplace Call Center (1-800-318-2596 or TTY: 1-855-889-4325). During this call, your client should instruct the Marketplace Call Center to include your full name and NPN on the re-enrollment transaction. Marketplace Call Center representatives will not add or remove an agent’s or broker’s NPN from an application unless requested by the consumer.

**Remember:** The Marketplace Call Center representatives will not provide you any information about a consumer’s application if the consumer is not part of the three-way call or has not previously authorized you to work on his or her behalf.

Passive Re-enrollment via Batch Auto Re-enrollment (BAR): Will I continue to get credit for a client whom I assisted last year if that client does not update his or her application and actively re-enroll during the current Open Enrollment period?

Yes. If a consumer whom you assisted previously does not make an active plan selection prior to the December 15 Open Enrollment period deadline, CMS will automatically re-enroll that individual in either the same plan or an alternate plan selected by the Marketplace via the BAR process. For all BARs, CMS transfers the NPN associated with the consumer’s prior application to the issuer via the enrollment transaction. CMS does not require you to have a current Marketplace registration status at the time of the passive re-enrollment to get credit for that renewal.

The issuer will check your NPN on the **Agent and Broker Federally-facilitated Marketplace (FFM) Registration Completion List** for the applicable benefit year to verify that you were registered with the Marketplace at the time of the prior enrollment.

³ Under the Enhanced Direct Enrollment Pathway, CMS allows approved direct enrollment partners to provide the full one-site experience for application, enrollment, and post-enrollment support on their own websites, without the secure redirect to and from the HealthCare.gov website.
What should I do if I have reason to believe that I should have received compensation for a consumer’s annual Marketplace re-enrollment, but did not?

If you have reason to believe you should receive renewal compensation for a Marketplace re-enrollment, but did not, you may contact the respective QHP issuer directly to discuss the situation.