# Centers for Medicare & Medicaid Services (CMS) Federally-facilitated Exchange (FFE) Training for Agents and Brokers

# Plan Year 2020 Vendor Application

This Vendor Application is to be completed by entities requesting approval to host Federally-facilitated Exchange (FFE) training for agents and brokers for the 2020 plan year pursuant to 45 C.F.R. § 155.222. Final approval for any vendor is contingent on signing an Agent Broker Vendor Agreement with the Centers for Medicare & Medicaid Services (CMS), approval of vendor's final training content, approval of vendor's information technology and data storage processes, adequate technical support, and compliance with applicable system standards and other regulatory requirements, including the requirement to offer continuing education units (CEUs) in at least five FFE or State-based Exchange on the Federal Platform (SBE-FP) states.

**NOTICE OF INTENT:** FOR RESOURCE PLANNING PURPOSES, CMS REQUESTS THAT ALL VENDORS SUBMIT A NOTICE OF INTENT TO <u>AgentBrokerVendor@cms.hhs.gov</u> NO LATER THAN **11:59 P.M. EST ON DECEMBER 21, 2018.** The Notice of Intent to submit an application should be provided in the form of a simple email message. It is not binding and will be relied on by the Government for planning purposes only. Submitting a negative response or no response does not preclude an organization from submitting an application.

APPLICATION DEADLINE: ALL VENDOR APPLICATION MATERIALS ARE DUE TO CMS BY 11:59 P.M. EST ON JANUARY 7, 2019 APPLICATION MATERIALS MUST BE SUBMITTED TO: <a href="mailto:agentbrokervendor@cms.hhs.gov">agentbrokervendor@cms.hhs.gov</a>. INCOMPLETE APPLICATIONS WILL NOT BE REVIEWED AND THE APPLICANT WILL BE DENIED.

Please note that CMS reserves the right to request additional documentation for all items in this application.

#### I. General Information

A. Terms and Definitions

#### **Term** Definition Entity applying to be a vendor of FFE training for agents and brokers. This is the same entity that is 1. Applicant entered in Part II, Section A, #1. Applicant representative through whom CMS contacts will be facilitated. This person has the authority **Primary Contact** to submit information and responses on behalf of the Applicant. This is the same person who is entered in Part II, Section A, #7. (The Primary Contact Person may be the same as the Authorized Person Representative, but it does not need to be.) Applicant representative who has the authority to bind the Applicant, and attest to organizational Authorized commitments and statements on behalf of the Applicant. This is the same person who is entered in Part Representative V. (The Authorized Representative may be the same as the Primary Contact Person, but it does not need to be.) 4. Total users Total number of unique users who have accounts or profiles established to access a training system. Total number of unique users who are accessing a training system at the same point in time. The Concurrent users number of concurrent users can never be larger than the number of total users. A learning management system is a software application for the administration, documentation, Learning

courses, or training programs.

tracking, reporting, and delivery of electronic educational technology (also called e-learning), education



Management System

7. Technical Assistance

Responding to individual inquiries and providing programmatic support to users who access and attempt to complete the training program. Technical assistance can pertain to a wide array of topics, including but not limited to: maneuvering the training content online, researching training completion record transmission to CMS and escalating as needed, and/or explaining program requirements.

#### **B.** Rules of Participation

In addition to executing an Agent Broker Vendor Agreement with CMS, approved vendors must adhere to the following Rules of Participation. The organization must:

- Participate in any requested teleconference calls with CMS staff and contractors to discuss relevant experience, organizational training, information technology capability, quality control procedures, and role of subcontractors (if applicable)
- 2. Perform system integration testing, user acceptance testing, and smoke testing (build verification testing) with or for CMS
- Attest to the accuracy of the Applicant's data collection prior to submission to CMS
- 4. Develop and submit a Quality Assurance Plan by the deadline established by CMS
- 5. Submit materials relevant to the training program, including plans for data sharing with CMS, and adhere to CMS business requirements and technical specifications for content, format, and delivery of training processes
- 6. Participate in and cooperate (including subcontractors) with all compliance and oversight activities conducted by CMS staff and contractors
- 7. Meet programmatic and submission deadlines, as specified by CMS
- 8. Permit any individual who holds a valid license (or equivalent State authority) to sell health insurance products to access the vendor's training process
- 9. Adopt a fee structure that is generally consistent with the fee structure for comparable health insurance trainings offered to agents and brokers, and is compliant with applicable state laws and regulations
- Acknowledge that CMS may, at its sole discretion, terminate, discontinue, or not renew the "approved" status of a vendor
- 11. Acknowledge that review of, and agreement with, the Rules of Participation is necessary for participation
- 12. Execute the Agreement Between CMS and Vendor of FFE Training for Agents and Brokers ("AB Vendor Agreement")
- 13. Comply with the specifications and standards outlined in the AB Vendor Agreement and all applicable guidance documents provided by CMS



## **II. Applicant Organization Experience**

Please check "Yes" or "No" for each item below, as appropriate. Note that a "No" response is not an automatic disqualification of an Applicant to become an approved vendor.

I. Legal Name of the Applicant Or	ganization			2. Federal Em	ployer Identification Number (FEIN)
3. Organization's Primary Mailing A	ddress				
Dity		Stat	e		Zip
1. Organization's Primary Telephone	e Number	5. W	/ebsite Address		6. Month and Year Company Founded
7. Primary Contact Person First Name	Middle II	nitial	Last Name		8. Primary Contact Person's Title
9. Primary Contact Person's Telep	hone Number	10. I	 Primary Contact Perso	on's Email Addre	SS
11. Has the applicant organization by previous plan year?	peen approved b	l by CMS	S to offer FFE training fo	or agents and bro	kers in a
12. Does the applicant currently have through contractual support to 0					
13. What is the applicant's training ς	goal for FFE train	ning fo	r plan year 2020?		
planation ease explain any "No" response tach additional sheets if neces		Section	n A, and indicate the	e answer(s) to v	which the explanation applies.



#### **B. Relevant Training Experience** 1. Indicate training experience since November 1, 2013. i. Applicant has hosted agent and broker training— ☐ Yes □ No a. For a minimum of two consecutive years, at any point during the five year period. b. That supported 2,500 or more concurrent users, at any point during the five year ☐ Yes □ No period. □ Yes □ No c. For at least 15,000 total users, at any point over the five year period. ☐ Yes ii. Applicant has offered training with CEU accreditation in at least five FFE or SBE-FP states. □ No iii. Applicant has hosted Sharable Content Object Reference Model (SCORM) compliant web-☐ Yes □ No based training content and examinations. iv. Applicant has hosted web-based training content and examinations that comply with Section 508 of the Rehabilitation Act of 1973 and/or the World Wide Web Consortium's □ Yes □ No Web Content Accessibility Guidelines (WCAG) 2.0 Level AA standards. v. Applicant has experience with functional and performance testing of a learning ☐ Yes □ No management system. vi. Applicant has designed and implemented quality control and assurance measures for □ Yes □ No training and exam delivery. vii. Applicant has run auditing and reporting features securely and reliably through a web-☐ Yes □ No based solution. viii. Applicant has provided technical assistance to at least 15,000 total users via— ☐ Yes □ No a. Web-form, web-chat, or email. □ Yes □ No b. Telephone. ix. Applicant has securely submitted training and user data a. To an external third-party organization. ☐ Yes □ No b. To a federal or state entity. ☐ Yes □ No c. Via a secure file transfer protocol (SFTP) integration with an external system. ☐ Yes □ No d. Via a secure web service exchange (e.g., extensible markup language (XML) □ Yes □ No gateway) with an external system. x. Applicant has created secure user accounts that can be updated by the host (Applicant) or ☐ Yes □ No the user (learner).



#### 2. List trainings offered since November 1, 2013.

Note: If Applicant offered FFE training for agents and brokers in a previous plan year, Applicant should only list <u>new</u> trainings offered since the last approved plan year application. If returning Applicant has no new trainings to report, please proceed to Section C.

i. If Applicant has offered federal- or state-sponso (Attach additional sheets if necessary.)	ored train	ing since No	ovemb	oer 1, 2013, pleas	se list l	pelow.
a. Name of Curricula / Courses and URL				Start and End Da	tes	
Target Audience	# of Tota	al Users	# of 0	Concurrent Users	Cost	to Learners
					\$	
Federal or State Agency Sponsor		Mode of Train	ning			
		☐ IN-PERS	SON	□ WEB-BAS	ED	□ ВОТН
Specific Topics Covered in Curricula / Courses						
b. Name of Curricula / Courses and URL				Start and End Da	tes	
Target Audience	# of Tota	al Users	# of 0	Concurrent Users	Cost	to Learners
					\$	
Federal or State Agency Sponsor		Mode of Train	ning			
		□ IN-PERS	SON	□ WEB-BAS	ED	□ ВОТН
Specific Topics Covered in Curricula / Courses						
c. Name of Curricula / Courses and URL				Start and End Da	tes	
Target Audience	# of Tota	al Users	# of 0	Concurrent Users	Cost	to Learners
					\$	
Federal or State Agency Sponsor		Mode of Train	ning			
		□ IN-PERS	SON	□ WEB-BAS	ED	□ ВОТН
Specific Topics Covered in Curricula / Courses						



d. Name of Curricula / Courses and URL				Start and End Da	tes	
Target Audience	# of Tota	al Users	# of C	Concurrent Users	Cost \$	to Learners
Federal or State Agency Sponsor		Mode of Train	ning			
		□ IN-PERS	SON	□ WEB-BAS	ED	□ ВОТН
Specific Topics Covered in Curricula / Courses						
e. Name of Curricula / Courses and URL				Start and End Da		
Target Audience	# of Tota	al Users	# of C	Concurrent Users	Cost \$	to Learners
Federal or State Agency Sponsor		Mode of Train	ning			
		□ IN-PERS	SON	□ WEB-BAS	ED	□ ВОТН
Specific Topics Covered in Curricula / Courses						
ii. If Applicant has offered large scale training (i.e. users and/or 15,000 or more total users) since Nov training listed in question 2.i. above, please list be	vember 1	, 2013, OTH	ER TH	AN federal- or s	state-s	
a. Name of Curricula / Courses and URL				Start and End Da	tes	
Target Audience	# of Tota	al Users	# of C	Concurrent Users	Cost \$	to Learners
Training Sponsor (if applicable)		Mode of Train	ning			
		□ IN-PERS	SON	□ WEB-BAS	ED	□ ВОТН
Specific Topics Covered in Curricula / Courses						
b. Name of Curricula / Courses and URL				Start and End Da	tes	
Target Audience	# of Tota	al Users	# of C	concurrent Users	Cost \$	to Learners
Training Sponsor (if applicable)		Mode of Train	ning			
				= 14/55 540		
		☐ IN-PERS	SON	□ WEB-BAS	ED	□ ВОТН



c. Name of Curricula / Courses and URL				Start and End Dat	ites
			<del></del>		1 .
Target Audience	# of Tot	tal Users	# of (	Concurrent Users	Cost to Learners
				l	\$
Training Sponsor (if applicable)	<u></u>	Mode of Trair	ning		
Training Operior (ii applicable)	I			= :::ED DAG	DOT!!
	I	☐ IN-PERS	3ON	□ WEB-BAS	SED □ BOTH
Specific Topics Covered in Curricula / Courses					
d. Name of Curricula / Courses and URL				Start and End Dat	ites
					1 -
Target Audience	# of Tot	tal Users	# of (	Concurrent Users	Cost to Learners
					\$
Training Sponsor (if applicable)		Mode of Trair	ning		
Truining Operior (ii applicable)				= \4/ED DAG	
		☐ IN-PERS	SON	□ WEB-BAS	SED □ BOTH
Specific Topics Covered in Curricula / Courses					
e. Name of Curricula / Courses and URL				Start and End Dat	ites
	<del>-</del>		<del></del>		
Target Audience	# of Tot	tal Users	# of (	Concurrent Users	Cost to Learners
				l	\$
Training Sponsor (if applicable)	<u> </u>	Mode of Trair	l ning		
ranning Species (ii species)	I				
	I	☐ IN-PERS	3ON	□ WEB-BAS	SED □ BOTH
Specific Topics Covered in Curricula / Courses		<u> </u>			
•					
Explanation					
Please explain any "No" responses in Part II, Section B	ر, and ind	dicate the ans	swer(s	) to which the exp	olanation applies.
(Attach additional sheets if necessary.)					



C. Relevant Data and Information Technology Experience		
1. Indicate experience with data security and retention since November 1, 2013.		
i. Applicant safeguards system data via back-up and offsite storage.	□ Yes	□ No
ii. Applicant follows established procedures for identifying and reporting breaches of confidential data.	□ Yes	□ No
iii. Applicant follows applicable federal and state requirements for collection and storage of personally identifiable information (PII).	□ Yes	□ No
Explanation Please explain any "No" responses in Part II, Section C, and indicate the answer(s) to which the ex (Attach additional sheets if necessary.)	kplanation :	applies.
D. Compliance History		
Current regulatory, enforcement, or legal actions are pending against the Applicant by a state or federal regulator.	□ Yes	□ No
<ol><li>Regulatory, enforcement, or legal actions have been taken against the Applicant by a state or federal regulator at any time since November 1, 2013.</li></ol>	□ Yes	□ No
Explanation Please explain any "Yes" responses in Part III, Section D, and indicate the answer(s) to which your (Attach additional sheets if necessary.)	r explanation	on applies.



# III. Capacity to Host FFE Training

Please check "Yes" or "No" for each item below, as appropriate. Note that a "No" response is not an automatic disqualification of an Applicant to become an approved vendor.

A. Trainin	g Program				
1. Indicate	current capacity to	offer FFE training for agen	ts and brokers.		
content re Note: Both scored and Applicants i.a through	equirements instead of options are available that has no impact on the who intend to creat	application review process. e their own training curric ts that intend to offer CMS	g curricula based on CMS ing content. · 2020. The vendor's decision is not ula must respond to questions -developed training should	□ Yes	□ No
a.	contract, or subcontra		MEs), or has the capacity to hire, relop complete and accurate FFE ontent requirements.	□ Yes	□ No
b.		ty to design and develop a work the date of conditional app		☐ Yes	□ No
C.	Applicant has the cap independently create		uality assurance reviews of all	□ Yes	□ No
trai		l review process will be requi	or quality assurance during the ired to offer CMS-developed		
		web-based training (includin r more total users over 12 co		□ Yes	□ No
concurren	it users and 13,000 or	Thore total users over 12 co	nisecutive months.	If yes, pleadocument demonstration capacity.	
		elop a learning management hin five months of the date o	system that can integrate CMS- of conditional approval.	□ Yes	□ No
		obtain CEU accreditation for deadline established by CMS	FFE training in at least five FFE S.	□ Yes	□ No
If yes, se	elect all FFE/SBE-FP	states where applicant intend	ds to apply for CEUs.		
☐ Alabama ☐ Alaska ☐ Arizona ☐ Arkansas ☐ Delaware ☐ Florida ☐ Georgia ☐ Hawaii ☐ Illinois		I Indiana I Iowa I Iowa I Kansas I Louisiana I Maine I Michigan I Mississippi I Missouri I Montana I Nebraska	<ul> <li>□ Nevada</li> <li>□ New Hampshire</li> <li>□ New Jersey</li> <li>□ New Mexico</li> <li>□ North Carolina</li> <li>□ North Dakota</li> <li>□ Ohio</li> <li>□ Oklahoma</li> <li>□ Oregon</li> <li>□ Pennsylvania</li> </ul>	□ South C □ South D □ Tenness □ Texas □ Utah □ Virginia □ West Vii □ Wiscons □ Wyomin	akota see rginia sin



2. Indicate current capacity to collect and store user data.		
<ul> <li>i. Applicant has capacity to collect and store identifying information for 15,000 or more total unique users, and up to 2,500 concurrent users, over 12 consecutive months.</li> </ul>	□ Yes	□ No
	If yes, pleadocuments demonstrated capacity.	
ii. Applicant has capacity to securely collect, store, and share FFE training completion data with CMS.	□ Yes	□ No
iii. Applicant has the ability to establish a Security Assertion Markup Language (SAML) redirect from CMS to the vendor website.	□ Yes	□ No
iv. Applicant has the ability to re-direct users and securely transmit their training completion data, including global user identifiers, for each user upon completion of training. <sup>1</sup>	□ Yes	□ No
v. Applicant has the ability to schedule the transmission of training completion data via SFTP.	□ Yes	□ No
vi. Applicant has the ability to transmit training completion data via a secure web service exchange (e.g., XML gateway).	□ Yes	□ No
vii. Applicant has the ability to verify eligibility for returning agents and brokers by cross- referencing the National Producer Numbers provided by agents and brokers with the previous year's Registration Completion List.	□ Yes	□ No
viii. Applicant has capacity to track users' progress and learner data using a data management system.	□ Yes	□ No
ix. Applicant has capacity to handle concurrent data and metrics requests from CMS, on both a regular and ad hoc basis.	□ Yes	□ No

3. Indicate current capacity to provide technical assistance/customer support.

<sup>&</sup>lt;sup>1</sup> Training completion data includes a vendor identifier, curriculum type, plan year, language, and date/time of completion.



<ul> <li>i. Applicant has capacity to provide tier-one help desk support to assist agents and brokers accessing the Applicant's FFE training platform from the CMS Enterprise Portal during regular business hours.<sup>2</sup></li> </ul>	□ Yes	□ No
a. Web-form, web-chat, or email.	□ Yes	□ No
b. E-mail support.	If yes, pleadocumental demonstraticapacity. Documental should include times, standoperating hafter hours support operapplicable.	ation to te this ation ude esponse dard nours, and technical tions, if
ii. Applicant has capacity to establish multiple escalating levels of technical help desk support to resolve inquiries including, but not limited to, basic navigation and system questions, troubleshooting, and researching of technical issues.	□ Yes	□ No
iii. Applicant has the capacity to provide CMS with technical support data and metrics on both a regular and ad hoc basis.	□ Yes	□ No
iv. Applicant has capacity to coordinate technical support with other CMS technical support resources.	□ Yes	□ No
Explanation Please explain any "No" responses to Part III, Section A and indicate the answer(s) to which the (Attach additional sheets if necessary.)	explanation a	applies.

<sup>&</sup>lt;sup>2</sup> For any inquiry received by the vendor's help desk, tier-one support includes intake, initial response, and resolution of inquiry through a scripted response or rerouting to the appropriate CMS help desk. The vendor help desk should be appropriately staffed to ensure that inquiries can be answered within 24 hours. In order to provide support compatible with and comparable to CMS' help desks, the vendor's help desk should, at a minimum, provide phone support to address system access issues and email support for other inquiries.



B. Data Privacy and Security	
1. Indicate current capacity to protect user data and maintain confidentiality.	
<ul> <li>i. Applicant has the capability to submit encrypted data through a secure, electronic connection with CMS, according to the standards described in the following sources:         <ul> <li>CMS security requirements</li> <li>The Federal Information Security Management Act of 2002 (FISMA), 44 U.S.C. Chapter 35</li> <li>OMB Circular A-130</li> <li>NIST SPs 800-53 and 800-53A</li> <li>CMS Information Security Acceptable Risk Safeguards (ARS) and CMS Minimum Security Requirements (CMSR) as amended</li> <li>Other policies, standards, procedures, and templates located on the CMS Information Security and Privacy Library</li> </ul> </li> </ul>	☐ Yes ☐ No  If yes, please submit documentation to demonstrate this capacity.
ii. Applicant has capacity to obtain authorization from agents and brokers to collect data on their behalf and submit the data to CMS.	□ Yes □ No
iii. Applicant has process in place to obtain confidentiality agreements from staff and subcontractors.	□ Yes □ No
iv. Applicant has capacity to work with CMS to resolve learning and user account data inconsistency problems.	□ Yes □ No
<ul> <li>v. In order to protect the privacy and security of users' identifying information, including training data and PII, Applicant has the capacity to receive, process, and store data according to the standards described in the following documents: <ul> <li>CMS security requirements</li> <li>FISMA, 44 U.S.C. Chapter 35</li> </ul> </li> <li>OMB Circular A-130 <ul> <li>NIST SPs 800-53 and 800-53A</li> </ul> </li> <li>CMS Information Security ARS and CMSR as amended</li> <li>Other policies, standards, procedures, and templates located on the CMS Information Security and Privacy Library</li> </ul>	☐ Yes ☐ No  If yes, please submit documentation to demonstrate this capacity.
Explanation Please explain any "No" responses to Part III, Section B and indicate the answer(s) to which the explain and sheets if necessary.)	xplanation applies.



es.	
□ Yes	□ No
If yes, ple submit documen demonstr capacity.	itation to
□ Yes	□ No
□ Yes	□ No
□ Yes	□ No
☐ Yes	□ No
□ Yes	□ No
□ Yes	□ No
□ Yes	□ No
xplanation	applies.
	☐ Yes  If yes, ple submit documen demonstr capacity.  ☐ Yes  ☐ Yes



D. Fee Structure		
D. 1 do di dotalo		
If Applicant becomes an approved CMS vendor, Applicant intenagent and broker users of the Applicant's training program.	ds to charge a fee to	□ Yes □ No
2. If the answer to question above is yes, please indicate pricing a	mount for each curricu	lum.
Note: Applicant may vary pricing depending on the number of FFE train (Individual Marketplace, Small Business Health Options Program (SHO Training for Returning Agents and Brokers, or a combination of these of CEUs. Prices must be comparable to similar trainings that are currently state requirements. Currently, FFE training for agents and brokers offer and SHOP Marketplace curricula takes between three and four hours. If Agents and Brokers offered by CMS takes approximately two hours to compare the support of t	P) Marketplace, Individual ptions) and whether the unavailable and must compled by CMS for both the Individual Marketplace Transitions.	al Marketplace user is receiving oly with applicable ndividual Marketplace
	With CEUs	Without CEUs
i. Charge for Individual Marketplace Training	\$	\$
ii. Charge for SHOP Marketplace Training	\$	\$
iii. Charge for Individual and SHOP Marketplace Training	\$	\$
iv. Charge for Individual Marketplace Training for Returning Agents and Brokers	\$	\$
v. Other type of pricing (describe below): (e.g. discounts to members)	\$	<u> </u>



#### IV. Project Staff

#### A. Applicant Staff

All vendors must adhere to the following standards for project staff, including subcontractors. To be eligible for consideration as a vendor, the Applicant must designate the following roles.

- A project manager, who is directly employed by the Applicant (i.e., not a subcontractor), who will oversee all FFE training operations and has at least two years of experience in overseeing all functional aspects of training, including (1) the development, testing, and hosting of courses and exams; (2) the collection, storage, security, and sharing of data; and (3) providing telephone and web-based technical assistance. The project manager will coordinate with CMS and must have prior experience coordinating with federal or state regulators (or other comparable experience).
- 2. A web-based training lead with experience managing large scale training projects.
- 3. A technical assistance lead with experience providing web-based and telephone support to users.
- 4. An information technology lead with experience hosting a secure data collection and storage system, ensuring organizational compliance with applicable federal and state privacy requirements, and conducting functional and performance testing of a learning management system.
- 5. A Systems Security Officer with the fundamental knowledge, skills, and abilities needed to define, design, integrate, and manage information system security policies and procedures.
- 6. Information system staff responsible for data submission that have had previous experience preparing and submitting data files in a specified format to external third-party organizations within the past two years.
- 7. As appropriate, in terms of sufficiency and experience, organizational back-up staff for coverage of key staff necessary to maintain system accessibility to end-users.

assume the roles and responsibilities outlined above.
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B. Subcontractors			
Applicant plans to use subcontractor(s) for FFE training for agents and brokers. ☐ Yes ☐ No			
If the answer to question above is yes, please indicate the organization name and experience for each subcontractor below. Attach additional sheets if necessary.			
	Subcontractor #1		
1.	Organization Name		
2.	Organization Mailing address		
3.	Telephone Number		
4.	Website Address		
5.	Number of Years in Business (Date Founded)		
6.	Number of Years Subcontractor has Worked with Applicant		
7.	Experience related to training, including names of projects to which subcontractor has contributed		
8.	Anticipated functions and responsibilities		
Su	bcontractor #2		
1.	Organization Name		
2.	Organization Mailing address		
3.	Telephone Number		
	Website Address		
5.	Number of Years in Business (Date Company Founded)		
6.	Number of Years Subcontractor has Worked with Applicant		
7.	Experience related to training, including names of projects to which subcontractor has contributed		
8.	Anticipated functions and		



### V. Applicant Organization Qualification and Acceptance

#### I certify that:

- I have reviewed and agree that my organization will meet the standards for project staff (including subcontractors), and Rules of Participation from the time that CMS grants conditional approval to become a vendor of FFE training for agents and brokers until such time that my organization's Agent Broker Vendor Agreement with CMS terminates or expires.
- The statements herein are true, complete and accurate to the best of my knowledge. I understand that CMS
  will be making its determination of my organization's eligibility to participate as an approved vendor of FFE
  training for agents and brokers based on the information and responses that I have provided.

1 = 0		
Name	Title	
Organization		
-		
Date	Signature	

