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Title: **CMS Enrollment Assistance Bulletin, 2025-01¹**

Subject: Training, Certification, and Recertification Guidance for Navigators and Certified Application Counselors in Federally-facilitated Exchanges

I. Purpose

In preparation for the Open Enrollment Period beginning November 1, 2025 for the 2026 plan year (PY) in the individual market, the Centers for Medicare & Medicaid Services (CMS) has updated the annual training curriculum for Navigators and Certified Application Counselors (CACs), collectively referred to as “assisters,” in the Federally-facilitated Exchanges (FFE). This bulletin provides guidance on the training, certification, and recertification for assisters in the FFEs.

Throughout this bulletin, we refer to the training curriculum as the “2026 training.” Training is provided through the Marketplace Learning Management System (MLMS), with optional supplemental trainings offered throughout the year as part of the Marketplace Assister Webinar Series.²

II. Certification and Recertification Requirements for Navigators in the FFEs

Before carrying out any required or authorized Navigator functions, Navigators in the FFEs must, among other things:

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² FFE assisters can register for the Marketplace Assister Webinar Series by creating or updating their existing [REGTAP account](#) and selecting the current year’s Marketplace Assister Webinar Series from the available training events. Assisters register once per year for the series, and are automatically registered for all future webinars, except special webinars outside of the Marketplace Assister Webinar Series.

- 1) Complete training that has been approved by CMS,³
- 2) Achieve a passing score on all approved certification examinations,⁴
- 3) Obtain continuing education and be certified or recertified on at least an annual basis,⁵ **and**
- 4) Meet all relevant state or Exchange licensing, certification, or other standards as required, provided these standards do not interfere with the implementation of the federal requirements.⁶

Training and FFE Navigator Certification. New and returning FFE Navigators must successfully complete⁷ the required 2026 Navigator training courses and meet any state certification requirements by November 1, 2025. **Note:** The abbreviated Navigator recertification training is not available for PY 2026. Returning FFE Navigators must complete all required 2026 Navigator training courses to become recertified.

FFE Navigators who complete the 2026 Navigator training will receive a Navigator certificate with an expiration date of October 31, 2026.

Returning FFE Navigators and Recertification. Returning FFE Navigators' certifications will expire on October 31, 2025. To continue performing any Navigator functions after October 31, 2025, returning FFE Navigators must successfully complete the 2026 Navigator training and meet any state certification requirements before November 1, 2025.

Use of Navigator ID Number. To register for the 2026 Navigator training on the MLMS training platform, all FFE Navigators must enter their unique 13-digit alphanumeric Navigator ID number assigned by the CMS Navigator grantee organization with which they are currently affiliated.

FFE Navigators must ensure their Navigator certificate reflects their current Navigator ID and affiliation with their CMS Navigator grantee organization.

³ See [45 CFR § 155.215\(b\)\(1\)\(ii\)](#).

⁴ See [45 CFR § 155.215\(b\)\(1\)\(iii\)](#).

⁵ See [45 CFR § 155.215\(b\)\(1\)\(iv\)](#).

⁶ See [45 CFR § 155.210\(c\)\(1\)\(iii\)](#).

⁷ *Successful completion* is defined as achieving a passing score on all approved certification examinations. See also [45 C.F.R. § 155.215\(b\)\(1\)\(iii\)](#).

Who Can Claim to Be an FFE-certified Navigator. Individual Navigators cannot present themselves as FFE-certified Navigators, or carry out any Navigator functions (including outreach and education activities), until they are trained and certified by the FFE.⁸

Additionally, individuals are prohibited from representing themselves as Navigators or performing Navigator functions in an FFE unless they are affiliated with a current CMS Navigator grantee and possess a valid Navigator certification that accurately reflects this affiliation.

III. Certification and Recertification Requirements for Certified Application Counselors (CACs) in the FFEs

CMS regulations require that, prior to functioning as a CAC, all CACs in the FFEs must, among other things:

- 1) Successfully complete training that has been approved by CMS,
- 2) Achieve a passing score on all approved certification examinations,
- 3) Obtain certification from their CDO upon successful completion of the FFE-approved CAC training, annually, **and**
- 4) Meet all relevant state or Exchange licensing, certification, or other standards as required, provided these standards do not interfere with the implementation of the federal requirements.⁹

The FFEs do not certify individual CACs. Instead, Certified Application Counselor Designated Organizations (CDOs) in the FFEs certify their associated CACs, as specified in their agreements with CMS. CACs must sign an agreement with the CDO that fulfills [45 CFR § 155.225\(d\)\(6\)](#) requirements. CACs need to be recertified by their CDO annually, after successfully completing CMS training and all relevant state or Exchange licensing requirements.¹⁰

CAC Roster. All CDOs in the FFEs are required to maintain a roster of their active CACs using the [CDO Organizational Maintenance Web Form \(OMWF\)](#) during their agreement

⁸ See [45 CFR § 155.215\(b\)\(1\)\(i\)](#). As noted in the preamble to the [HHS Notice of Benefit and Payment Parameters for 2017](#), “nothing in the Exchange regulations prohibits individuals who are not trained and certified as Exchange-approved Navigators...or certified application counselors from conducting outreach about Exchanges and providing application and enrollment assistance. These individuals can conduct outreach and education about Exchanges as long as they do not represent themselves as Exchange-approved Navigators...or certified application counselors.” [81 Fed. Reg. 12204, 12257](#) (Mar. 8, 2016).

⁹ We encourage CACs and CDOs to review the standards applicable to CDOs and individual CACs under [45 CFR § 155.225\(d\)](#), including [§ 155.225\(d\)\(1\)](#), [\(d\)\(7\)-\(8\)](#).

¹⁰ See [45 CFR § 155.225\(d\)\(7\)](#).

period with CMS.¹¹ Maintaining an up-to-date roster is necessary for CACs in the FFEs to access the annual certification training on the MLMS, and it is a required component of the CDO's record with CMS.

The CDO's contact(s), typically the CAC Project Director, must keep an updated roster active CACs, with their full names, email addresses, and CAC IDs. For new CDOs, failure to have at least one certified CAC on your CAC Roster within 90 days of receipt of the Welcome Packet email will result in decertification/removal from the CDO Program. For existing CDOs, going without at least one certified CAC on their roster for 90 consecutive days within their two-year period of performance, will result in decertification or removal from the CDO Program.

Note: CDOs should track their CACs' annual training completion dates from the MLMS to ensure compliance with federal standards.¹²

To ensure compliance with the CAC certification requirements, CDOs in the FFEs should:

- 1) [Assign](#) each CAC a unique 13-digit alphanumeric CAC ID number,
- 2) [Maintain a roster](#) of active CACs using the [CDO Organizational Maintenance Web Form](#),
- 3) Confirm individuals interested in becoming a CAC have successfully completed certification training and meet all ongoing certification requirements, and
- 4) Recertify returning CACs within one year of their current CDO-issued certification. Recertify returning CACs by November 1, 2025.

Training. CACs who successfully completed the 2025 training received a MLMS training certificate which expires on October 31, 2025. CDOs should confirm new and returning CACs complete the 2026 CAC training prior to November 1, 2025 in preparation for the Open Enrollment Period for PY 2026.

Use of CAC ID Number. To register for the 2026 CAC certification training on the MLMS training platform, all CACs must enter their unique 13-digit alphanumeric CAC ID number assigned by their affiliated CDO in the CAC ID field on the "Welcome to the MLMS" profile page.

¹¹ CMS typically designates CDOs in the FFEs for a 2-year period. CDOs in the FFEs are responsible for renewing their certification with CMS within a timeframe determined and communicated by CMS to remain active and continue providing enrollment assistance services. A CDO **MUST** renew its agreement before its certification expires. More information on the CDO renewal process can be found on the [CDO technical assistance page of Marketplace.CMS.gov](#).

¹² Additional instructions on how to create and maintain a CAC roster, as well as assign CAC IDs, are available in the [CDO OMWF User Guide](#) (April 2025).

CACs must ensure their CDO issued CAC certificate reflects their current CAC ID number and CDO affiliation. CACs confirm their current CAC ID with their affiliated CDO prior to registering for the 2026 CAC training.¹³

CDO organizations newly approved ¹⁴ for PY 2026, should instruct their CACs to wait for their CAC ID number and confirm they are listed on the CDO's roster in OMWF before beginning the 2026 CAC certification training.

IV. Frequently Asked Questions

1. Will the 2026 training for the Navigators and CACs in the FFEs be the same as the 2025 training?

The 2026 training will be similar to last year's CMS web-based certification training, with modules focused on required assister duties.

***Change for 2026 training:** CMS will not offer an abbreviated recertification training for returning Navigators or CACs. Returning FFE Navigators and CACs must complete all required 2026 Navigator or CAC training courses to become recertified.

2. What are the FFE assister training courses for 2026, and how many hours will be needed to complete the training?

The 2026 FFE assister training includes the following courses where "R" stands for required and "O" stands for optional:

Course Title	New/Returning FFE Navigators and CACs
001 Training Overview	R
002 Health Coverage Basics	O
003 Affordable Care Act Basics	R
004 Privacy, Security, and Fraud Prevention Standards	R
005 Marketplace Application Essentials	R

¹³ **Current CDO Organizational ID Numbers** are formatted as follows: **state abbreviation** (first two letters), **CDO** (next three letters), and **unique CDO organizational ID** (last three alphanumeric characters). Example: NYCDOA12. **Individual CAC IDs** should contain the 8-character CDO Organizational ID and five unique numbers at the end of the CDO ID, assigned by the CDO, to create a unique 13-character CAC ID. If an ID contains **CAC**, it is invalid, and the CAC should contact their CDO for a new ID number immediately.

¹⁴ Organizations interested in providing CAC enrollment assistance to consumers in a FFE for PY 2026 must be approved CDOs and enter into an agreement with CMS. The [CDO application](#) can be completed online and CMS also has [several technical assistance resources](#) available for interested applicants.

Course Title	New/Returning FFE Navigators and CACs
006 Serving Select Population Groups and Communities	R
007 Cultural Competence and Language Assistance	R
008 Working with Individuals with Disabilities	R
009 Customer Service Standards and Community Outreach	O
010 Coverage to Care Assistance	O
011 Complex Application Issues	O

FFE Navigators and CACs must successfully complete all the required courses to become certified or recertified. The amount of time it takes to complete the training will vary from person to person. CMS estimates it will take approximately 6-7 hours to complete the full training.

3. As an existing CDO in an FFE, do I need to complete and return a new CMS-CDO Agreement each year?

No. CDOs are certified for a period designated by CMS, usually spanning two (2) years.¹⁵ For instance, CDOs that became certified in 2025 will be due for CDO Renewal in 2027. Before the end of a CDO's 2-year certification period, the CMS-CDO Agreement must be renewed if the CDO wishes to continue its CDO functions.

CMS will email the CDO's leadership contacts for renewal. Before renewal, CDOs must update the organization's contact information the CDO Organizational Maintenance Web Form (if necessary).

4. Does an existing FFE CDO need to enter into a new agreement with their organization's CACs as part of the CACs' recertification?

No. CMS regulations do not require CDOs to enter into a new agreement with their individual CACs as part of the recertification process. However, each CDO must

¹⁵ The exceptions to the model CMS-CDO Agreement's typical two-year term are when (1) in the sole and absolute discretion of CMS, thirty (30) days' advance written notice of nonrenewal is provided by CMS to CDO, or the Agreement is terminated pursuant to *Section V* of the CMS-CDO Agreement; (2) either CMS or the CDO terminates the CMS-CDO Agreement without cause and for its convenience upon at least thirty (30) days' prior written notice to the other Party, where practicable; (3) CMS terminates the CMS-CDO Agreement for cause pursuant to *Section V.2* of the CMS-CDO Agreement; or (4) when the CDO rejects an Amendment to the CMS-CDO Agreement pursuant to *Section VII. 8* of the CMS-CDO Agreement.

ensure that its agreements with individual CACs are consistent with 45 CFR § 155.225(d)(6) and the CDO's agreement with CMS. If desired, a CDO may choose to enter into a new agreement with its CACs as part of the CACs' recertification in accordance with the CDO's own internal policies and procedures for overseeing the individual CACs it certifies.

In addition, a CDO in an FFE should ensure that any agreement it has with its CAC is in effect and has not expired. If the CDO's agreement with its CAC has expired, the individual CAC is no longer authorized to serve as a CAC, and the CDO must enter into a new agreement in order for the individual to serve as a CAC again, as required by federal regulations at 45 CFR § 155.225(d)(6).

5. As an individual CAC in an FFE, what do I need to do to get certified by the FFE?

The FFEs do not certify or recertify individual CACs. Certification and recertification of individual CACs in the FFEs is the responsibility of the FFE CDO that the CAC is affiliated with. Each FFE CDO must [assign CAC ID numbers](#), [maintain a CAC roster](#) using the [CDO Organizational Maintenance Web Form \(OMWF\)](#), and ensure that all CACs it certifies or recertifies have completed the necessary federal and any state training requirements, consistent with the CDO's agreement with CMS. Individual CACs should use their current CAC ID to access and complete certification training. The CDO's CAC Roster will automatically update with the CAC's completion date within 48 hours after successful completion of required training.

Please remember that the official CAC certification is not issued by the FFEs or by the MLMS training website; it is issued only by the CDO with which the CAC is affiliated. CDOs should use the MLMS training completion date noted on the CAC roster (48 hours after completion) to confirm successful completion of the required training.

6. What steps must CDOs in an FFE take to certify or recertify their CACs?

FFE CDOs are required to fulfill all of the following:

- 1) Have a process in place for identifying individuals who want to be certified or recertified as CACs and evaluating their compliance with:
 - Federal rules governing the CAC program, as set forth in 45 CFR § 155.225,
 - The terms and conditions of the CAC's agreement with the organization (for CACs seeking recertification),
 - The organization's policies and procedures for its CAC activities, and

- Any applicable state requirements that do not prevent the application of the provisions of title I of ACA.
- 2) Confirm with each individual who fully meets whether they are seeking certification or recertification. For individuals seeking certification or recertification:
- Require the individual disclose any relationships with qualified health plans, insurance affordability programs (e.g., Medicaid, CHIP), or other potential conflicts of interest to the CDO, in accordance with 45 CFR § 155.225(d)(2),¹⁶
 - Assign each the individual a unique 13-digit alphanumeric CAC ID number,
 - Confirm the individual is listed on the CDO's roster in OMWF,
 - Ensure that the individual takes the 2026 CAC training and provides the CDO with proof of successful completion (e.g., training completion date on CAC roster and the training certificate),
 - Enter into an agreement (or update the agreement) with the individual per 45 CFR § 155.225(d)(6) (see FAQ #4 above), and
 - Issue a new official CAC certificate.
- 3) If a CDO fulfills its duty under 45 CFR § 155.225(d)(2) by informing consumers of its relationships with qualified health plans, insurance affordability programs, or other conflicts of interest through individual CACs, it must also disclose these relationships to its certified CACs. The CDO should annually update and disclose these relationships to all recertified CACs, ensuring current information is provided to consumers (See 45 CFR § 155.225(d)(2) for disclosure requirements).

Organizations must wait until all steps for certification or recertification are completed before issuing CAC certifications or recertifications, including ensuring individuals take the 2026 CAC training and provide proof of completion.

¹⁶ Organizations should note that 45 CFR § 155.225(g)(2) establishes that an individual or entity serving as a CAC or CDO is prohibited from receiving any direct or indirect compensation from a health insurance or stop loss insurance issuer relating to enrolling individuals in a qualified health plan (QHP) or non-QHP. However, in an FFE, health care providers are not disqualified from functioning as a CAC or CAC designated organization solely because they receive compensation from a health insurance issuer for health care services rendered.

7. If a CAC in an FFE does not wish to be certified or the CDO decides not to certify the CAC, what steps should the organization take?

When a CAC's certification expires or is withdrawn by a CDO, the CAC must immediately stop presenting themselves as a CAC (both verbally and in any written or electronic materials) and providing CAC services to consumers.

When the CAC's certification or agreement expires or is withdrawn, the CDO must also decertify the individual on the CAC roster.

Additionally, the agreement between CMS and each CDO in an FFE requires the CDO to have at least one staff member or volunteer certified as a CAC. CMS reserves the right to request the names and identification numbers of all CACs certified by the organization, pursuant to *Section II. 4* of the CMS-CDO Agreement.

8. What resources are available to assisters other than the required training?

Beyond the web-based certification training, CMS provides optional supplemental trainings through the Marketplace Assister Webinar Series and the Marketplace Assister Microlearning modules. These training opportunities keep FFE assisters informed on policy changes and updates affecting Navigators, CACs, and consumers. CMS is consistently identifying and implementing new forums for assisters to effectively access and utilize [technical assistance information and resources provided by CMS](#).

Please direct any questions regarding requirements in this bulletin as follows:

- **Navigators** should contact the Project Director for their Navigator grantee organization who can reach out to their CMS Project Officer, if needed.
- **Certified Application Counselors** should send questions via email to CACQuestions@cms.hhs.gov.