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Title: **CMS Enrollment Assistance Bulletin, 2026-01¹**

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

I. Purpose

In preparation for the annual Open Enrollment Period, which will begin on November 1, 2026 for plan year (PY) 2027 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 “2027 training.” Training is provided through the Marketplace Learning Management System (MLMS), with optional supplemental trainings offered year-round through 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:

¹ 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 material was produced and disseminated at U.S. tax filer expense.

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 CMS approved training,³
- 2) Achieve a passing score on all approved certification examinations,⁴
- 3) Engage in continuing education and obtain CMS certification or recertification annually,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

CMS Training and FFE Navigator Certification. New and returning FFE Navigators must successfully complete⁷ the required 2027 Navigator training courses and meet any state certification requirements by October 1, 2026.

Note: The abbreviated Navigator recertification training is not available for PY 2027. Returning FFE Navigators must complete all required 2027 Navigator training courses to become recertified.

FFE Navigators who successfully complete the 2027 Navigator training will receive a Navigator certificate with an expiration date of October 31, 2027.

Returning FFE Navigators and Recertification. Returning FFE Navigators' certifications will expire on October 31, 2026. To continue performing any Navigator functions after October 31, 2026, returning FFE Navigators must successfully complete the 2027 Navigator training and meet any state certification requirements before November 1, 2026.

Use of Navigator ID Number. To register for the 2027 Navigator training on the MLMS training platform, FFE Navigators must enter their unique 13-digit alphanumeric Navigator ID number assigned by their affiliated CMS Navigator grantee organization. FFE Navigators must ensure their Navigator certificate reflects their current Navigator ID and affiliated 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 all CACs in the FFEs must meet certain requirements before operating as a CAC:

- 1) Successfully complete CMS training,
- 2) Achieve a passing score on all approved certification examinations,
- 3) Obtain certification from their Certified Application Counselor Designated Organization (CDO) upon successful completion of the annual FFE-approved CAC training, **and**
- 4) Meet all relevant state or Exchange licensing, certification, or other standards, as long as these standards do not conflict with the federal requirements.⁹

The FFEs do not certify individual CACs. Instead, 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 the requirements listed at [45 CFR § 155.225\(d\)\(6\)](#). CACs must 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 period with CMS.¹¹ Maintaining an up-to-date roster is necessary for CACs in the FFEs to

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\(d\)\(7\)](#).

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

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 of active CACs, with their full names, email addresses, and CAC ID numbers. 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 or 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 CMS certification training and meet all ongoing certification requirements, and
- 4) Recertify returning CACs within one year of their current CDO-issued certification. Returning CACs must be [recertified](#) by November 1, 2026.

Training. CACs who successfully completed the 2026 training received a MLMS training certificate which expires on October 31, 2026. CDOs must ensure new and returning CACs complete the 2027 CAC training before November 1, 2026 in preparation for the PY 2027 Open Enrollment Period.

Use of CAC ID Number. To register for the 2027 CAC training on the MLMS training platform, 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. CACs should confirm their current CAC ID number with their affiliated CDO prior to registering for the 2027 CAC training.¹³

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 ID numbers, are available in the [CDO OMWF User Guide](#) (January 2026).

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 ID numbers** should contain the 8-character CDO Organizational ID and five unique numbers at the

CACs must ensure their CDO issued CAC certificate includes their current CAC ID number and CDO affiliation.

Newly approved CDOs ¹⁴ for PY 2027 should instruct their CACs to wait until they verify their OMWF roster listing and provide them with their CAC ID number and before beginning the 2027 training.

IV. Frequently Asked Questions

1. Will the 2027 training for the Navigators and CACs in the FFEs be the same as the 2026 training?

The 2027 training will be similar to last year's CMS web-based certification training, with modules focused on required Assister duties.

Similar to last year, CMS will not offer an abbreviated recertification training for returning Navigators or CACs. Returning FFE Navigators and CACs must complete all required 2027 Navigator or CAC training courses to become recertified.

2. What are the FFE assister training courses for 2027, and how many hours will be needed to complete the training?

The 2027 FFE Assister training includes the following courses where "R" stands for required and "O" stands for optional:

Course Title	
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
006 Serving Select Population Groups and Communities	R
007 Cultural Competence and Language Assistance	R

end of the CDO ID, assigned by the CDO, to create a unique 13-character CAC ID number. 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 2027 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
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 2026 will be due for CDO Renewal in 2028. 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 in the CDO's OMWF (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 CACs as part of the recertification process. However, each CDO must ensure compliance with 45 CFR § 155.225(d)(6) and their CMS agreement. A CDO may choose to enter into a new agreement with its CACs as part of the CDO's own internal policies for recertification of its CACs.

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.

The CDO should ensure that CAC agreements are current. If the CDO's agreement with its CAC has expired, the CAC is no longer authorized to serve as a CAC until a new agreement is signed as required by federal regulation 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 affiliated CDO. Each CDO must [assign CAC ID number](#), [maintain a CAC roster](#) using the [CDO Organizational Maintenance Web Form \(OMWF\)](#), and ensure all CACs meet federal and state training requirements as outlined in their CMS agreement.

CACs should use their assigned alphanumeric CAC ID number 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 training completion.

Note: The official CAC certification is issued by the CDO, not the FFEs or the MLMS training website. CDOs should verify CAC training completion using the MLMS training date recorded on the CAC roster 48 hours after completion.

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

FFE CDOs are required to fulfill 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 individual's agreement with the organization (applicable to 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 qualified individual whether they are seeking certification or recertification. For those pursuing 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 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 2027 CAC training and provides the CDO with proof of successful completion (e.g., training completion date on CAC roster),
 - 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 provide proof of successful completion of the CAC 2027 training.

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?

Upon expiration or withdrawal of a CAC's certification by a CDO, the CAC is required to stop presenting themselves as a CAC in all verbal, written, or electronic communications and must immediately discontinue offering 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 in the OMWF.

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

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.

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 consistently identifies and establishes new forums for assisters to effectively access and utilize [technical assistance information and resources provided by CMS](#).

Please direct any questions concerning the requirements in this bulletin as instructed below:

- **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.