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**September 11, 2025**

## **Frequently Asked Questions (FAQs) Regarding Decommissioning the Classic Direct Enrollment (DE) Pathway**

These FAQs clarify the guidelines that DE Entities must follow to decommission their classic DE pathways.

For any questions regarding these FAQs, please contact DE Support at [directenrollment@cms.hhs.gov](mailto:directenrollment@cms.hhs.gov).

### **1. Can enhanced direct enrollment (EDE) Entities access the classic DE pathway after 10/31/2025?**

No. EDE Entities must decommission their classic DE pathways on or before 10/31/2025. Prospective and approved EDE Entities are not able to access the consumer-facing or agent/broker-facing classic DE pathways in test or production environments after 10/31/2025.

Please note, the current EDE program requirements for calendar year 2025 are defined in the *Third-party Auditor Operational Readiness Reviews for the Enhanced Direct Enrollment Pathway and Related Oversight Requirements* (published April 16, 2025) (EDE Guidelines).<sup>1</sup> CMS intends to release updated EDE Guidelines for calendar year 2026 audit submissions. Accordingly, prospective and approved EDE Entities should continue to review the *Direct Enrollment and Enhanced Direct Enrollment* CMS webpage<sup>2</sup> for updated guidance documents.

Entities operating Phase 2 EDE pathways must refer consumers to the Marketplace Call Center or HealthCare.gov when they encounter scenarios that their Phase 2 platform cannot support. These Entities will no longer have the option to redirect consumers to the classic DE pathway.

### **2. Can prospective Entities still apply for approval to use the classic DE pathway before 10/31/2025?**

No. CMS is no longer onboarding prospective Entities to the classic DE pathway. Entities are only eligible to be considered for approval to use the EDE pathway.

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<sup>1</sup> <https://www.cms.gov/files/document/guidelinesforenhanceddirectenrollmentauditsforyear8final.pdf>

<sup>2</sup> <https://www.cms.gov/marketplace/agents-brokers/direct-enrollment-partners>

**3. How can a prospective Entity or an Entity that was only approved to use the classic DE pathway participate in the EDE program after the classic DE pathway is decommissioned?**

As described in the EDE Guidelines, there are a number of options available to use EDE to assist consumers with completing an Exchange eligibility application and enrolling in a qualified health plan (QHP). At a high level, Entities may seek approval to participate in the EDE program as a:

- a. Primary EDE Entity that has developed its own EDE environment;
- b. Upstream EDE Entity leveraging an approved primary EDE Entity's EDE environment;
- c. Downstream agent/broker using an approved primary or upstream EDE Entity's EDE environment

Please note, some of these options may require developing a technical platform to interface with the Exchange, implementing and documenting privacy and security controls, and submitting documentation to CMS—including third-party audits—prior to being approved. For additional information on EDE program participation options and arrangements, see the EDE Guidelines available at <https://www.cms.gov/marketplace/agents-brokers/direct-enrollment-partners>.