

January 2026 Enrollment Form Changes FAQ

- **If applicants use forms this October that contain Race and Ethnicity or provide a Sex value of Unknown during AEP in October 2025, will it be rejected?**

Plans are expected to use the updated form for enrollment requests received on or after January 1, 2026. However, plans can use the updated enrollment form for the upcoming AEP or sooner if they wish. MARx updates to the race, ethnicity, and sex fields will be effective beginning January 1, 2026, so the enrollment transaction submissions that contain race/ethnicity or unknown sex values during the AEP will not be rejected. Applicants can use forms with race and ethnicity questions during the AEP, but plans should immediately begin submitting race and ethnicity responses to CMS as “form left blank” or “I choose not to answer” on enrollment transactions at this time to avoid receiving a TRC 396, as described in the HPMS memo.

- **Are beneficiaries’ phone numbers and email addresses new fields included in the January 1, 2026, deadline?**

Yes, in an upcoming communication, CMS will highlight beneficiary phone number and beneficiary email address in the narrative portion of the communication.

- **Will applications be rejected if the National Producer Number (NPN) is not initially provided or missing on the enrollment form?**

*On a TC 61 enrollment transaction, if the plan submits an ‘agent’ or ‘broker’ value in the relationship to enrollee field and the NPN number is not submitted, the enrollment **will** reject. CMS will send an updated memo to the plans in the future with any additional changes or clarifications that are necessary.*

- **Will CMS be removing the value “unknown” in all file layouts for the sex field?**

Yes, CMS will be removing the value “unknown” in all MARx file layouts for the sex field, effective on and after January 1, 2026.

- **Is the May 6, 2025 memo titled "Advance Announcement of January 2026 Software Release" considered the final set of requirements, or should we anticipate a follow-up memo confirming finalized guidance?**

CMS anticipates sending an additional memo with clarifications and additional guidance in the near future.

- **In the file layout, the verbatim record is now a length of 463. However, the length of the DTRR is 600. Shouldn’t they be the same?**

No, different lengths do not matter in AWS. However, if the plan is using the mainframe, CMS recommends that plans use fillers in the verbatim record.

- **Which OEC Application Date should plans submit on either the TC 61 or TC 92 files – (1) the timestamp taken directly from the OEC download file or (2) the application date that is a result of subtracting 11 hours from the CMS timestamp as directed in the enrollment guidance?**

Enrollments received through the OEC uses Coordinated Universal Time (UTC), which is four hours earlier than Eastern Daylight Time as the system time to generate the timestamp of when an enrollment was received. Although the timestamp will not be required in MARx, Plans should enter this UTC date in Field 48- “OEC Application Date”. Field 11- “Application Date” should continue to reflect the application date received “via the OEC to be 11 hours earlier than the time and date CMS “stamps” on the request, and (2) use the adjusted application date to determine eligibility for election periods and proper effective date for coverage.”