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## **Title: Questions and Answers for the Plan Year 2026 Vendor Training Application**

Date: December 2024

### **Q: What is the purpose of the Application?**

A: Pursuant to 45 C.F.R. § 155.222, the Centers for Medicare & Medicaid Services (CMS) is releasing the vendor training application for organizations interested in applying to become a plan year 2026 vendor of Federally-facilitated Marketplace (Marketplace) training for agents and brokers assisting consumers with enrollment through the Marketplace (including both the Individual Marketplace and Small Business Health Options Program (SHOP)).

### **Q: Why is CMS doing this?**

A: Our intent is to make the Marketplace training and registration process easier for agents and brokers, and to attract greater agent and broker participation in the Marketplace through partnerships with third-party organizations. CMS will use the application to evaluate whether an applicant meets the requirements to become a Marketplace training vendor.

### **Q: How do agents and brokers benefit from this program?**

A: For plan year 2026, agents and brokers will have the option to complete Marketplace training through the online platform of an approved vendor. By completing training through an approved vendor, agents and brokers are eligible to receive continuing education units (CEU) for fulfilling the Marketplace training requirement. All approved vendors will provide technical assistance to agents and brokers who access their training. Agents and brokers who complete Marketplace training through a vendor are still required to execute all applicable Marketplace Agreements with CMS prior to assisting consumers seeking to enroll in coverage through the Marketplace.

### **Q: What does this mean for State-based Marketplaces?**

A: State-based Marketplaces have their own standards for training and registration, which must be followed by agents and brokers in those states. However, some State-based Marketplaces have received approval to utilize the federal platform to support selected eligibility and enrollment functions for the Individual Marketplace, SHOP, or both. Agents and brokers in these Marketplaces (known as State-based Marketplaces on the Federal Platform) must complete the Federally-facilitated Marketplace registration and training requirements. This includes completing agent and broker training through an approved vendor, or through the CMS Marketplace Learning Management System, in order to satisfy standards for participation in the Marketplace.

### **Q: How has the application changed for plan year 2026?**

A: There are no changes to the application for plan year 2026.

**Q: Will agents and brokers be able to receive CEUs for Marketplace training offered by approved vendors?**

A: Yes. Approved vendors must offer CEUs in at least five states in which a Federally-facilitated Marketplace or State-based Marketplace on the Federal Platform is operating.

**Q: Will CMS continue to provide Marketplace training to agents and brokers?**

A: Yes. For plan year 2026, CMS will continue to offer Marketplace training and registration for agents and brokers at no cost. CMS will also continue to offer technical assistance and other guidance on the process for completing Marketplace training and registration.

**Q: Are conditionally approved vendors required to develop their own Marketplace training for agents and brokers?**

A: No. Similar to plan year 2025, for plan year 2026, conditionally approved vendors can use only CMS-developed training content. For plan year 2026, vendors will not be allowed to integrate supplemental content into CMS-developed modules. Vendors that develop their own supplemental training<sup>1</sup> for agents and brokers must gain written approval from CMS and are required to submit supplemental training content to CMS for review and approval.

**Q: Are approved vendors permitted to modify CMS-developed training content?**

A: No. Vendors that wish to supplement the training content provided by CMS must develop and offer their own supplemental training modules separate from the CMS-developed modules. Vendors must gain prior written approval from CMS to pursue this option. CMS does not assume responsibility for any errors that may exist within the vendor-developed supplemental training modules. It is expected that vendors who elect to develop their own supplemental training modules are adequately utilizing this opportunity to provide new, substantive content to further educate agents and brokers on complex scenarios and supply sophisticated material unique to the vendor.

**Q: Are vendors required to offer SHOP training for plan year 2026?**

A: No. Vendors are permitted to direct agents and brokers to CMS' Marketplace Learning Management System to complete SHOP training. However, vendors are encouraged to offer SHOP training to their users.

**Q: When will CMS make its training content available to conditionally approved vendors?**

A: CMS will make its final Marketplace training content available to vendors approximately 30 days prior to the scheduled go-live date. More detailed schedule information for plan year 2026 Marketplace training will be provided in early 2025.

**Q: What is the estimated go-live date for plan year 2026 Marketplace training?**

A: CMS intends to make Marketplace training for plan year 2026 available to agents and brokers in July or August 2025. A final schedule will be made available to conditionally approved vendors in early 2025.

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<sup>1</sup> The supplemental training provides new, substantive content to further educate agents and brokers on complex scenarios and provide sophisticated material unique to the vendor.

**Q: Are approved vendors required to perform information verification functions for agents and brokers?**

A: No. In the 2017 Payment Notice Final Rule (81 FR 12203 at 12264 - 12265), CMS eliminated the requirement from 45 C.F.R. § 155.222 that approved vendors perform information verification services, as CMS intends to continue performing the identity proofing function and expects that qualified health plan issuers and web-brokers are overseeing affiliated agents and brokers to ensure that they have the appropriate licenses required under the applicable State law.

**Q: Are vendors that were approved to provide Marketplace training for agents and brokers for plan year 2025 required to reapply if they wish to participate in the vendor training program for plan year 2026?**

A: Yes. According to 45 C.F.R. § 155.222(a)(3), each vendor must submit an application for each year that approval is sought. However, the application has been shortened to ease the administrative burden for returning vendors.

**Q: What is the deadline and process for submitting the application and receiving approval from CMS?**

A: The application to offer plan year 2026 Marketplace training is due to CMS by 11:59 PM ET on Friday, January 17, 2025. Applicants should email the application along with any attachments to CMS at [AgentBrokerVendor@cms.hhs.gov](mailto:AgentBrokerVendor@cms.hhs.gov). Questions should also be sent to this address. CMS anticipates conditionally approving vendors during the month of March 2025. Final approval to provide training to Marketplace agents and brokers is contingent upon the following conditions:

1. Submission of a signed Agent Broker Vendor Agreement;
2. Submission and CMS approval of final training content (if applicable);
3. CMS approval of vendor's information technology processes, including the vendor's demonstrated ability to collect, store, and share agent and broker training completion data with CMS;
4. Offering CEU credits in a minimum of five states where the Marketplace is operating;
5. Providing technical support to agents and brokers completing the vendor's training; and
6. Compliance with CMS system standards and applicable regulatory requirements.