

Certified Application Counselor Designated Organization (CDO) Frequently Asked Questions (FAQs)

Overview of the CDO Program	1
CDO Program	2
Preparing to Apply to the CDO Program.....	4
Post-Application Submission	7
CMS-CDO Agreements	8
CMS-CDO Agreement Renewals	15
CAC Roster	17
Other Administrative Data.....	25
Data Maintenance.....	27

Overview of the CDO Program

Annually, the Centers for Medicare & Medicaid Services (CMS) invites organizations that are not currently Certified Application Counselor Designated Organizations (CDOs) and that want to become a CDO in a Federally-facilitated Marketplace (FFM) to apply during CMS’s Open Season. CDOs are a vital component of the Assister community. In the FFM, CDOs oversee Certified Application Counselors (CACs) who are trained and able to help consumers seeking health coverage options through the Marketplace. Any organization operating in an FFM state seeking to provide CAC enrollment assistance to consumers should apply to become a CDO using the [CDO Application web form](#).

August 2023

You can access additional training materials, FAQs, and videos that describe the CDO life cycle on the [CDO Program web page](#). You can also access these additional resources:

- [CDO Application Demonstration video](#)
- [CDO Learning Series – CDO Application video](#)
- [CDO Learning Series – CDO Data Management video](#)

Note: Organizations with an active CMS-CDO Agreement should use the CDO Organizational Maintenance web form to renew your CDO status every two years, update your information, and upload and maintain your CAC roster.

If you are unsure if your organization has an existing CMS-CDO agreement, please email us at CACQuestions@cms.hhs.gov. Please be sure to provide your organization's name and CDO ID for verification.

CDO Program

Where can I find more information about becoming a CDO?

For more information about becoming a Certified Application Counselor Designated Organization (CDO), visit the [CDO Program web page](#).

What is a CAC?

In an FFM, a CAC is an individual staff member or volunteer who is certified by a CDO and who is trained and able to help consumers as they consider health coverage options through the Marketplace, including helping them complete the Marketplace eligibility and enrollment process. Their services are free to consumers.

As a CDO, what are my duties and obligations in managing/overseeing my CACs?

Per Section II, 1 – 20 (Obligations and Conditions) of the CMS-CDO Agreement, as authorized by 45 CFR 155.225, organizations that serve as CDOs in FFMs must, among other things:

1. Enter into an agreement with each staff member or volunteer seeking certification as a CAC to oversee their performance. To find a model CDO-CAC agreement, refer to [model CDO-CAC agreement](#).
2. Issue unique CAC ID numbers to individual CACs. For instructions about assigning CAC IDs, refer to [How to Assign Unique CAC IDs](#).

3. Upload and maintain a roster of its existing CACs. CMS offers a tool on the CDO Organizational Maintenance web form to record your roster of CACs. CACs must be on your roster to access annual federal assister certification training on the Marketplace Learning Management System (MLMS).
4. Require its CACs to complete annual federal assister training. Assisters can complete assister training through the CMS Enterprise Portal and MLMS. New users can register at the [CMS Enterprise Portal](#). Existing users can log in at the [CMS Enterprise Portal](#).
5. Confirm its CACs successfully completed annual federal assister certification training and examinations. Upon successful training and examination completion, the system will populate the completion dates. CACs should present their CDO with an MLMS training Certificate of Completion.
6. Provide its CACs who successfully completed training and meet all other state or organizational requirements (if applicable) with a certificate. To find a model certificate, visit the [CDO Welcome Packet web page](#) under the Welcome Packet of Instructions heading. The "organization official signature" line should be signed by a person from the CDO who has the authority to certify individuals as CACs.

Our organization is a health plan issuer or agent/broker. Can we become a CDO?

Individuals and entities who receive direct or indirect consideration from a health insurance issuer or stop loss insurance issuer in connection with the enrollment of an individual into a qualified health plan (QHP) or non-QHP are ineligible for the CDO Program and cannot serve as CDOs or CACs (45 CFR 155.225(g)(2)).

For guidance on the role of health insurance issuers, agents, and brokers in providing application and enrollment assistance to consumers, send an inquiry to the Agent and Broker Mailbox at [FFMProducer- AssisterHelpdesk@cms.hhs.gov](mailto:FFMProducer-AssisterHelpdesk@cms.hhs.gov).

Can we apply to become a CDO if our state operates a State-based Marketplace (SBM) or State-based Marketplace using the Federal Platform (SBM-FP)?

No, CMS does not certify assister organizations in states that operate an SBM or an SBM-FP. Per the CMS-CDO Agreement, CMS is responsible for the management and oversight of the FFMs and designates CDOs in states that operate an FFM.

For guidance regarding assister certification requirements, we encourage you to contact your state's Department of Insurance.

Preparing to Apply to the CDO Program

When can my organization apply to become a CDO?

CMS invites organizations that would like to become CDOs to apply during CMS's CDO Application Open Season every summer.

Any organization operating in an FFM state seeking to provide CAC enrollment assistance to consumers for the upcoming plan year needs to apply to become a CDO and enter into an agreement with CMS during this Open Season.

If you are unsure if your organization has an existing CMS-CDO agreement, please email us at CACQuestions@cms.hhs.gov. Please be sure to provide your organization's name for verification.

What steps must my organization take to become a CDO?

To become a CDO, you must complete two steps during the CDO Application Open Season:

1. The person who will serve as the Organization Senior Official, should CMS approve the application, must access and complete the [CDO application](#), including the COI Attestation form, using the CDO Application web form. CMS will review your application and will send a Preliminary Approval email to applicants that meet CDO program requirements.

Note: This is **not** a final approval. You must complete step 2.

2. The Organization Senior Official must access and submit a signed CMS-CDO agreement using guidance provided in the Preliminary Approval email. CMS will review your signed CMS-CDO agreement and will send a Welcome Packet email to applicants that meet CDO program requirements. You should keep a copy of your Welcome Packet email, your CDO ID, contact information, and the counter-signature page of the CMS-CDO agreement for your records.

If CMS sends an email requesting additional information during the application process, you must provide the requested information to proceed in the application process. CMS will not process your application until they receive all requested information.

What is the CDO Application web form?

The CDO Application web form is the platform organizations use to submit CDO applications to CMS. Any organization operating in an FFM state seeking to provide CAC enrollment assistance to consumers must apply to become a CDO using the CDO

Application web form and enter into an agreement with CMS. The CDO Application web form link is only accessible during the CDO Application Open Season, which takes place each summer.

To learn more about the CDO application process and CDO Program requirements, visit the [CDO Program web page](#).

Who can access the CDO Application web form?

Initially, anyone from your organization can access the CDO Application web form to submit the CDO application. CMS requests that each organization has at least two leadership contacts: an Organization Senior Official and a CAC Project Director. The Organization Senior Official must complete, sign, and submit the application.

Each CDO will designate up to three contacts to correspond with CMS on behalf of your CDO moving forward. These three contacts can include the two leadership contacts identified when initially accessing the CDO Application web form.

What is the Conflict-of-Interest (COI) Attestation?

The Organization Senior Official will complete the COI Attestation form during the CDO application process in order to meet CMS regulations prohibiting certain relationships.

Pursuant to 45 C.F.R. § 155.225(g)(2) and the agreement between CMS and the CDO designated as such by CMS in a state in which a Federally-Facilitated Exchange (FFE) is operating (“CMS-CDO Agreement”), any CDO and applicable staff member or volunteer of a CDO who is certified to serve as a CAC must not receive any consideration directly or indirectly from any health insurance issuer or issuer of stop loss insurance in connection with the enrollment of any individuals in a qualified health plan (QHP) or non-QHP. Such consideration will be considered a prohibited conflict of interest. All CDOs are required to complete a conflict of interest attestation form.

Are there other resources available to help users complete the CDO Application?

Before you get started, reference the Quick Start Guide available on the CDO Application web form to understand what information you need to complete the CDO application. You can also reference the [CDO Application Web Form User Guide](#) for step-by-step instructions to complete the CDO Application web form.



What if our organization does not have a company email?

If your organization does not have a general company email address, please provide the email address of one of your organization's leadership contacts included on your CDO application. CMS requests a company email address to have a consistent contact within the organization. CMS will not publish this email address for public use.

Why am I receiving a "CDO Organization Found" error when I enter my organization's information?

You are receiving a "CDO Organization Found" error message because CMS already received an application from your organization, and it is either under review, or your organization is already approved as a CDO.

CMS designates your organization for two years; if you were already approved and are within your two-year certification period, you do not need to reapply to operate as a CDO at this time.

If you are not sure of your organization's CDO status, you can send a message to us using the comment field on the "CDO Organization Found" page. We will respond via CACQuestions@cms.hhs.gov.

What if our organization does not have two leadership contacts to fulfill the Organization Senior Official and CAC Project Director roles?

Please email us at CACQuestions@cms.hhs.gov to discuss your situation.

What if the CDO Application web form does not let me add my state in the "Service Location" section?

If your state operates a State-based Marketplace (SBM) or State-based Marketplace using the Federal Platform (SBM-FP), the CDO Application web form will not list your state in the "Service Location" state picklist.

If you are not sure what Marketplace type your state operates, email us at CACQuestions@cms.hhs.gov.

For service location assistance please refer to Find Local Help resources:

- [FLH Upkeep Tool](#)
- [FLH Upkeep Tool User Guide](#)
- [FLH Upkeep Tool FAQs](#)

Post-Application Submission

I am not getting emails from CACQuestions@cms.hhs.gov. What do I do?

Please check your spam/junk folder. To ensure you receive communication from CMS moving forward, please add "CACQuestions@cms.hhs.gov" to your contacts and spam filters.

Where can I go for information after I submit a CDO application?

To receive a status of your application or to submit additional information requested by CMS, email us at CACQuestions@cms.hhs.gov.

How long does it take CMS to review my initial application and issue a preliminary approval?

CMS's CDO Program Office will review your CDO application within 10 business days of receipt. We review applications in the order in which they are received.

Where do we send the additional information CMS requested for our application?

If you receive a request for more information about your CDO application from CMS, please send the requested information to CACQuestions@cms.hhs.gov.

Can we update our information while our CDO application is under review?

You cannot change your information while your CDO application is under review. If CMS approves your CDO application, you will receive a Preliminary Approval email. The email will contain a link to the CDO Organizational Maintenance web form where you can edit your organization's information.

What do we do after receiving a Preliminary Approval email?

After you submit an initial CDO Application, CMS will review the application. CMS will send a Preliminary Approval email to organizations that meet program requirements; however, at this stage, the application process is not complete.

The Preliminary Approval email includes a link to the CDO Organizational Maintenance web form and guidance for proceeding with the application process. After receiving a Preliminary Approval email, your organization must access the CDO Organizational Maintenance web form to submit a signed CMS-CDO Agreement.

Receiving a Preliminary Approval email does NOT mean CMS approves your organization as a CDO. Your organization is not an approved or designated CDO until you complete and return a signed CMS-CDO Agreement and you receive a Welcome Packet email from CMS that includes your CDO ID and the counter-signature page of the CMS-CDO Agreement with the effective date of your agreement and two-year CDO certification period.

CMS-CDO Agreements

What is the CDO Organizational Maintenance web form?

Organizations that receive CMS approval on their CDO application will gain access to the CDO Organizational Maintenance web form, which is the platform organizations use to:

- Submit an initial signed CMS-CDO Agreement;
- Keep their CDO record up to date;
- Add and maintain their roster of CACs; and
- Submit a new signed and dated CMS-CDO Agreement, including a COI Attestation form, to renew their CDO status every two years.

Who can access the CDO Organizational Maintenance web form?

Only your Organization Senior Official, CAC Project Director, or Secondary Contact (if applicable) can access the CDO Organizational Maintenance web form. These individuals must use the email address entered on the CDO application when creating an access code for the CDO Organizational Maintenance web form.

While you complete the CDO application, you will designate up to three leadership contacts to correspond with CMS on behalf of your CDO moving forward.

Can anyone from my organization sign the CMS-CDO Agreement?

No, only an Organization Senior Official authorized to represent and bind your organization for purposes of the CMS-CDO Agreement may sign the CMS-CDO Agreement.

If the responsible entity changes after CMS approves your organization as a CDO, your organization must update its information on record with CMS and submit a new signed CMS-CDO Agreement using the CDO Organizational Maintenance web form.

Do I need to resubmit the COI Attestation when I renew my status?

Yes. The Organization Senior Official must complete a COI Attestation form during the CDO renewal process in order to meet CMS regulations prohibiting certain relationships.



How do I submit the signed CMS-CDO Agreement?

One of your organization's leadership contacts may access the CDO Organizational Maintenance web form to upload a signed CMS-CDO Agreement.

To generate an agreement using the CDO Organizational Maintenance web form:

1. Log in to the CDO Organizational Maintenance web form. In the Agreement PDF table, select the **Add** or **Replace** link.
2. On the "Attestation and Agreement Upload" page, select the **Print PDF Agreement** button.
3. Print the agreement and obtain the Organization Senior Official's signature.

To upload an agreement:

1. In the Agreement PDF table on the "CDO Summary" page, select the **Add** link.
2. On the "Attestation and Agreement Upload" page, select the **Browse** button under the "Upload a File" section.
3. In the pop-up window, navigate to the location of the saved PDF version of the signed agreement, select the file, and select the **OK** button.
4. Select the **Upload Attachment** button.
5. In the Attachment Summary table, select the **View** link to open the file. The web form will display a warning message if the agreement was not uploaded.
6. Select the **Save and Return** button.
7. Back on the "CDO Summary" page, select the **Submit** button.

On the "Confirmation" page, select the PDF button to generate a PDF confirmation containing the information submitted. CMS recommends that you print and save this document for your records.

Your contacts will also receive an acknowledgement email confirming receipt of your CMS-CDO Agreement.

I submitted an agreement, and now I can't edit anything else on the maintenance web form. Why?

After you submit a CMS-CDO Agreement, CMS will review the agreement. While an agreement is under review by CMS, you will be unable to edit your organization's information. After receiving a determination email, you will be able to edit your organization's information using the CDO Organizational Maintenance web form.

I submitted the signed CMS-CDO Agreement, and it keeps getting rejected. Why?

CMS will not accept your signed CMS-CDO Agreement if you did not submit all pages of the agreement or if any of the following information is missing or does not match your organization's approved corresponding CDO application:

- Service location(s)
- Signature of Organization Senior Official
- Organization Senior Official Name and Title
- Date of signature
- Organization Name
- Corresponding Application ID
- Organization address
- Conflict of Interest Attestation.

Agreements cannot be edited. If you need to make changes, navigate to the "CDO Summary" page of the Organizational Maintenance web form and regenerate the agreement.

Do I need to upload the entire CMS-CDO Agreement, or just the signature page?

When you submit your CMS-CDO Agreement, make sure to include all pages, including the signature page and COI Attestation page beginning on page 13, for review.



What is the difference between the CDO Application web form and CDO Organizational Maintenance web form?

The [CDO Application web form](#) is the platform organizations use to submit CDO applications to CMS. Any organization operating in an FFM state seeking to provide CAC enrollment assistance to consumers must apply to become a CDO using the CDO Application web form and enter into an agreement with CMS. The CDO Application web form link is only accessible during CMS's Open Season, which takes place each summer. *Once you apply, you will not need to access the CDO Application web form again.*

Organizations that receive CMS approval on their CDO application will then gain access to the [CDO Organizational Maintenance web form](#), which is the platform organizations use to:

- Submit an initial signed CMS-CDO Agreement;
- Keep their CDO record up to date;
- Add and maintain their roster of CACs; and
- Submit a new signed and dated CMS-CDO Agreement and COI to renew their CDO status every two years.

How do I get access to the CDO Organizational Maintenance web form?

If CMS approves your application, we will send a Preliminary Approval email to your contacts on file. The Preliminary Approval email contains a link to the CDO Organizational Maintenance web form where you must upload your signed CMS-CDO agreement.

How long does it take CMS to review my signed CMS-CDO Agreement?

CMS's CDO Program Office will review your CMS-CDO Agreement within five business days of receipt. We review agreements in the order in which they are received.

After CMS completes our review, we will send a Welcome Packet email that includes your CDO ID, the counter-signature page of the CMS-CDO Agreement with the effective date of the agreement and two-year CDO certification period, and important guidance for operating as a CDO.

What happens if I do not submit the signed CMS-CDO Agreement?

New applicants that do not submit a signed CMS-CDO Agreement after receiving Preliminary Approval from CMS will not become a CDO. Only organizations that submit their signed CMS-CDO Agreement and receive a CDO ID from CMS can certify staff or volunteers as CACs. Submitting a CDO application is only the first step of the application process. To complete

the process, one of your organization's contacts must submit the signed CMS-CDO Agreement for CMS review, and your organization must receive final approval from CMS.

Existing CDOs must renew before your agreement and CDO certification expires, or you will become inactive. If this happens, your organization will need to re-apply, since your CDO ID will no longer be valid. Per the CMS-CDO Agreement, you must also instruct your CACs to stop providing enrollment assistance as CACs.

What happens after I submit the signed CMS-CDO Agreement?

CMS's CDO Program Office will review your CMS-CDO Agreement within five business days of receipt. If your CMS-CDO Agreement requires revision and/or resubmission, CMS will send an email to your contacts on file requesting the information or changes needed and instructions for resubmitting the agreement.

If CMS approves your CMS-CDO Agreement, we will send a Welcome Packet email that includes your CDO ID, counter-signature page with the effective date of the agreement and two-year CDO certification period, and important guidance for operating as a CDO.

My CDO is not due for renewal, but the system is requiring me to upload a new CMS-CDO Agreement. Why?

You are receiving a message to upload a new CMS-CDO Agreement because one of your contacts updated your organization's information and these changes require a new signed and dated CMS-CDO Agreement.

Updating the following information triggers the need for an updated CMS-CDO Agreement:

- Organization name change
- Changes to the Organization Senior Official's contact information
- Changes to your headquarters' address
- Adding or removing service locations

What is the file size limitation for the signed CMS-CDO Agreement?

The CDO Organizational Maintenance web form will not accept attachments that exceed 10 MB.

CMS only requires that you submit all pages of the agreement, including the COI Attestation form beginning on page 13, but *not the Appendix*. If you include the Appendix, your PDF may exceed the 10 MB limit.

If you continue to receive an error message, please try uploading only the agreement pages excluding the Appendix. If you continue to receive an error message, email us at to CACQuestions@cms.hhs.gov. Please include the list of steps you were taking prior to receiving the error message and attach a screenshot.

I submitted an agreement, but CMS requested a revision or resubmission; how do I proceed?

After CMS reviews your CMS-CDO Agreement and determines that we need you to resubmit the agreement or revise the agreement, we will send your contacts an email with details regarding what information you need to edit or resubmit.

Edits or resubmissions may include:

- Submitting all pages of your CMS-CDO Agreement, including the COI Attestation form beginning on page 13. You do NOT need to include the Appendix. If we do not receive all pages, we will not accept your agreement.
- Having the Organization Senior Official sign the agreement. If the signature on the last page is missing, or if the signature does not match the Organization Senior Official listed on your application, we will not accept your agreement.
- If the agreement has been edited in any way, we will not accept your agreement. Edits should only be made in the Organizational Maintenance web form if necessary. The terms of the agreement cannot be edited at all.

Before re-submitting your agreement, please review all pages of the agreement and confirm your organization information. If any information is incorrect, return to the CDO Organizational Maintenance web form and edit your organization information on record. Remember to save and submit any edits. Then, regenerate your agreement.

I do not have a Replace link in the Agreement PDF table. How do I replace my existing CMS-CDO Agreement?

If the Replace link is not available on the CDO Summary page of the CDO Organizational Maintenance web form, your previously submitted agreement may be under CMS review. Once CMS sends you a determination email identifying whether CMS accepts your CMS-CDO Agreement or not, you can access the maintenance web form and select the **Replace** link in the Agreement PDF table.

If you are unsure if your organization submitted an agreement recently, please contact us at CACQuestions@cms.hhs.gov.

The maintenance web form will not let me add my state in the “Service Location” section. Why?

If your state operates a State-based Marketplace (SBM) or State-based Marketplace using the Federal Platform (SBM-FP), the CDO Organizational Maintenance web form will not list your state in the “Service Location” state picklist.

If you are not sure what Marketplace type your state operates, email us at CACQuestions@cms.hhs.gov.

How do we know we have completed the CDO application process?

An organization becomes a designated CDO after submitting a CDO application and a signed CMS-CDO agreement and receiving final approval from CMS. CMS will send a Welcome Packet email with “CDO Agreement Approved” in the subject line after approving a CMS-CDO Agreement. The Welcome Packet email includes your CDO ID, the counter-signature page with the effective date of your certification, and important guidance for operating as a CDO.

Note: Per Section IV.1 (Effective Date; Term and Renewal) of the CMS-CDO Agreement, your two-year certification period is based on the effective date listed on the counter-signature page of the CMS-CDO Agreement.

What should we do if we submitted an application or signed CMS-CDO Agreement and have not heard from CMS?

CMS will immediately confirm receipt of a CDO application, signed CMS-CDO Agreement, or supporting documentation in an email from CACQuestions@cms.hhs.gov. If you do not receive this email, you may not have selected the **Submit** button to complete the process. Please return to the form and select **Submit**.

If an organization’s CDO application is approved, CMS will send a Preliminary Approval email within 10 business days of submitting a CDO application. If an organization receives approval to be a designated CDO, CMS will send a Welcome Packet email within five business days of submitting a signed CMS-CDO Agreement.

If you submitted documentation in support of your application and received an email confirming receipt, but CMS has not sent a Preliminary Approval email or Welcome Packet email after 30 business days, email us at CACQuestions@cms.hhs.gov. Please include your organization’s name and CDO application ID.

What should we do if we experience technical issues with the CDO Application web form or CDO Organizational Maintenance web form?

If you encounter technical issues when accessing the CDO Application web form or CDO Organizational Maintenance web form, email us at CACQuestions@cms.hhs.gov and include the list of steps you were taking prior to receiving the error message along with an attached screenshot.

Whom do we contact if we have additional questions about the CDO application process?

You can access CDO application technical assistance webinar recordings, user guides, and more by going to the [CDO Program web page](#). If you have additional questions, email us at CACQuestions@cms.hhs.gov.

CMS-CDO Agreement Renewals

As an existing CDO, can I just resubmit my initial CMS-CDO Agreement from two years ago to complete the renewal?

No. To renew your CDO certification, the Organization Senior Official must access the [CDO Organizational Maintenance web form](#) and upload a new signed and dated CMS-CDO Agreement. The Organization Senior Official must also complete a new COI Attestation form during the CDO renewal process in order to meet CMS regulations prohibiting certain relationships.

If you do not renew your CDO certification before its expiration date, you will become inactive. If this happens, your organization will need to re-apply, since your CDO ID will no longer be valid. Per the CMS-CDO Agreement, you must also instruct your CACs to stop providing enrollment assistance as CACs.

Should I review my organization's existing information (contacts, service area, etc.) before submitting a new signed and dated CMS-CDO Agreement?

Yes, we recommend reviewing and updating (if necessary) all of your organization's information prior to submitting a new CMS-CDO Agreement. This will reduce the likelihood of CMS not accepting your agreement because the information in the agreement does not match our records.



How do I know when I need to renew the CMS-CDO Agreement as an existing CDO?

Per Section IV.1 (Effective Date; Term and Renewal) of the CMS-CDO Agreement, at the end of each two-year CDO term, organizations must renew participation in the CDO Program by updating their organization information and returning a new signed and dated CMS-CDO Agreement using the Organizational Maintenance web form before the expiration date of the organization's CMS-CDO Agreement and certification period.

You can find your expiration date on the "CDO Summary" page of the CDO Organizational Maintenance web form, or you can email us at CACQuestions@cms.hhs.gov. You will also receive a reminder email from CMS 30 days before your renewal date.

I submitted a renewal agreement, and now I can't update anything else on the maintenance web form. Why?

After you submit a new CMS-CDO Agreement, CMS will review the agreement. While an agreement is under review by CMS, you will be unable to edit your organization's information, and your record is locked. After receiving a determination email, you will be able to edit your organization's information using the CDO Organizational Maintenance web form.

If our initial leadership contacts have all changed, how do we access the maintenance web form to renew?

If none of your initial leadership contacts are with your organization, please email us at CACQuestions@cms.hhs.gov and provide the following information for each of your new contacts:

- Full Name
- Title that person is assuming within your CDO – Organization Senior Official, CAC Project Director, or Secondary Contact (optional)
- Job title
- Phone number
- Email address

Once we receive this information, we will update your organization's contact list and will send the new contacts a Welcome Packet email with your organization's CDO ID, the

counter-signature page of the CMS-CDO Agreement, and critical information about the CAC Program.

What happens if we do not renew the CMS-CDO Agreement before its expiration?

If you do not renew your CDO certification with CMS before your agreement and CDO certification expires, you will become inactive. If this happens, your organization will need to re-apply since your CDO ID will no longer be valid. Per the CMS-CDO Agreement, you must also instruct your CACs to stop providing enrollment assistance as CACs.

Where can we learn more about renewals?

You can find the existing CDO renewal information by visiting the [Information for active CDOs](#) web page.

I submitted my renewal CMS-CDO Agreement. Are there other tasks my organization must complete at this time?

After CMS approves your CMS-CDO Agreement, you should add your CAC roster or review your existing CAC roster and make any necessary changes.

Maintaining a roster of your existing CACs using the CDO Organizational Maintenance web form is necessary for your CACs to access assister certification training on the Marketplace Learning Management System (MLMS).

What if we do not want to renew our CDO status and want to leave the program?

If you do not renew your CDO status before the expiration date of your CDO certification, you will become inactive. If this happens, your CDO ID will no longer be valid. Per the CMS-CDO Agreement, you must also instruct your CACs to stop providing enrollment assistance as CACs.

If you would like to **withdraw** from the CDO Program anytime during your two-year certification period, per Section II.6 (Obligations and Conditions) and Section V (Termination) of the CMS-CDO Agreement, as authorized by 45 CFR 155.225, you must, among other things:

1. Send a formal written request to CMS at CACQuestions@cms.hhs.gov at least 30 business days prior to the date that you intend for the CMS-CDO Agreement to terminate, where practicable. The written request should include your CDO ID and the date when your CMS-CDO Agreement will terminate.

2. Notify your organization's staff and volunteers that, as of the effective date of termination of its agreement with CMS, they will no longer be certified to provide enrollment and application assistance to consumers. Ensure that neither your organization nor your staff or volunteers hold themselves out to the public as a CDO or as a CAC, respectively, after the effective date of termination.
3. Keep in mind that consumer consent documents must be appropriately secured and retained for no less than six years, unless a different and longer retention period has already been provided under other applicable federal law. Your organization's duty to protect and maintain the privacy and security of personally identifiable information (PII) survives its withdrawal from the CDO Program. Please refer to your organization's agreement with CMS, including the appendices to the agreement, for guidance on the requirements for record keeping of PII and personal health information (PHI).
4. Submit a request to CMS to remove your organization's listing(s) from Find Local Help using the [Find Local Help Upkeep Tool](#) at least seven business days before your organization will cease providing CAC services to the public, and in the event that such advance notice is not feasible, within no more than 24 hours after your organization has ceased providing CAC services to the public. For service location assistance, please refer to Find Local Help resources:
 - [FLH Upkeep Tool](#)
 - [FLH Upkeep Tool User Guide](#)
 - [FLH Upkeep Tool FAQs](#)

CAC Roster

What is the purpose of CAC IDs?

Per Section II.2.b.i (Obligations and Conditions) of the CMS-CDO Agreement, as authorized by 45 CFR 155.225, a CDO issues unique CAC IDs for staff and volunteers, which assisters need to take the annual assister certification training on the MLMS.

In addition, per Section II.2.b.x.7 (Obligations and Conditions) of the CMS-CDO Agreement, as authorized by 45 CFR 155.225, consumers must enter a CAC's ID into their Marketplace application when receiving enrollment assistance from a CAC.

How do I assign CAC IDs?

For instructions on assigning CAC IDs, go to [How to Assign Unique CAC IDs](#).

Is there a place for us to document our roster of CACs and CAC IDs?

Yes, all existing CDOs must use the [CDO Organizational Maintenance web form](#) to add and maintain a roster of CACs. For Plan Year 2021 and beyond, CMS added functionality to the CDO Organizational Maintenance web form for you to use to populate your roster of CACs, track your training completion dates, and keep your roster up-to-date.

This functionality allows you to:

- Document your CACs' legal names*, email addresses, and CAC IDs.

*If the middle name is documented in the CMS Portal, please OMIT it from the CAC Roster. Do not add a middle name to either the First Name or Last Name fields.

- Monitor your CACs' annual assister certification training completion dates from the MLMS. These dates are populated from the MLMS system and cannot be edited.
- Maintain your roster of CACs during your two-year certification period.

Maintaining a roster of your existing CACs using the CDO Organizational Maintenance web form is necessary for your CACs to access assister certification training on the MLMS.

This feature will not automatically assign CAC IDs for you; your CAC Project Director is still responsible for assigning CAC IDs.

Who can upload and maintain our CAC Roster?

Any of your organization's leadership contacts can access the CDO Organizational Maintenance web form to add and maintain your CAC roster.

The maintenance web form is not allowing me to add any CACs to my CAC roster. Why?

Before adding your CACs for the first time, you need an approved CMS-CDO Agreement and CDO ID with CMS. If you have an approved CMS-CDO Agreement and are an existing CDO with CMS, the Agreement PDF table on the "CDO Summary" page of the maintenance web form will list the effective and expiration dates of your CDO certification.

If you do not have an approved CMS-CDO Agreement and are not yet an existing CDO with CMS, you will receive error messages when you attempt to add CACs to your roster because your organization does not have a CDO ID.

If this issue persists, email us at CACQuestions@cms.hhs.gov.

How do I add my CACs to the CAC Roster for CMS?

CDOs have two options when adding your roster of CACs:

- Manually using the CDO Organizational Maintenance web form to submit information on your CACs individually. You can manually add up to five CACs per log in session with this method.
- Using the CAC Roster Template provided by CMS to collect information for many CACs at once and upload it to the CDO Organizational Maintenance web form.

To learn more about how to do manage your CAC roster, you can refer to videos and guides by visiting the [CDO Program web page](#).

Where can I find the CAC roster template?

To access the CAC Roster template:

- Log in to the [CDO Organizational Maintenance web form](#).
- On the “CDO Summary” page, navigate to the CACs section.
- Select the **Add CAC Roster** button.
- Select the **CAC Roster Template** button. The web form will open the template.

Where can I find the manual CAC roster entry point?

To add your roster of CACs manually:

- Log in to the [CDO Organizational Maintenance web form](#).
- On the “CDO Summary” page, navigate to the CACs section.
- Select the **Add CAC Roster** button.
- Select **No** to the question about whether you want to use the CAC Roster Template.

I am having trouble with the .csv file for the Roster Template. What do I do?

To troubleshoot your issue with the .csv file, please email us at CACQuestions@cms.hhs.gov and include the list of steps you were taking and attach a screenshot.

The roster asks me to save the .xml file. What do I do with that?

The maintenance web form is prompting you to save your CAC Roster as an .xml file to ensure error-free uploading to your CDO record. When prompted, save this .xml file for your organization's records.

What is the difference between the roster template and the manual entry?

The CAC Roster Template allows you to add all of your Certified Application Counselors (CACs) to a .csv file you can upload to the maintenance web form.

The manual entry option allows you to add up to five CACs per log in session by entering their information for each CAC individually.

Why is the maintenance web form not accepting the CAC ID I am entering in the CAC Roster section?

The maintenance web form will not accept a CAC ID if:

- You are using an old CAC ID (i.e., the root ID has "CAC" in it instead of "CDO").
- Another CAC on your roster has the same CAC ID (each ID must be unique).
- You are using a CAC ID affiliated with a decertified CAC (organizations should not recycle old IDs).
- Another CDO lists the CAC as a unique contact or as a CAC on their roster. If the CAC left that organization, the previous CDO must remove them as a contact or decertify them and remove them from their CAC roster.

If you have questions about errors you are receiving, contact us at CACQuestions@cms.hhs.gov and include a screenshot of the error message you are receiving.

To access further instructions for maintaining your CAC roster, visit the Information for existing CDOs web page.

I keep getting error messages when I try to enter data using the CAC Roster Template, even though I'm entering the data correctly. What do I do?

To troubleshoot your issue with the .csv file, please email us at CACQuestions@cms.hhs.gov and include the list of steps you were taking prior to receiving an error message and attach a screenshot.

What should I enter in the “Previous CAC ID” field?

The “Previous CAC ID” field is optional. The intent of this field is to allow organizations to enter a CAC’s previous CAC ID assigned to them by another organization or previously assigned to them by your organization. If your organization does not want to document this information, you do not need to.

How do I edit the training certification date?

You cannot modify the “Training Completion Date” field. The system will automatically populate this field once your CACs complete the assister certification training in the MLMS.

For additional assistance with the assister certification training, please contact the MLMS team at MLMSHelpDesk@cms.hhs.gov.

How do I edit data for my CACs after adding them to the roster?

You can only edit a CAC's last name and email address. All other changes require you to decertify the CAC and add them again either manually or using the CAC Roster Template, and assign them a new CAC ID.

To edit a CAC's last name or email address on your CAC roster:

- Log in to the [CDO Organizational Maintenance web form](#).
- Navigate to the CAC section of the “CDO Summary” page.
- Locate the individual you need to modify and select the **Edit** link in the Action column of the CAC table.
- On the “CAC Contact Edit” page, modify the fields listed as needed.
- Select the **Save and Return** button.
- On the “CDO Summary” page, select the **Submit** button.

How to I decertify a CAC?

Please note: Once a CAC is decertified, this action cannot be undone, and that CAC ID will no longer be valid. To decertify a CAC from your CAC roster:

- Log in to the [CDO Organizational Maintenance web form](#).
- On the “CDO Summary” page, navigate to the CAC Roster Table.

- Locate the individual you need to decertify and select the **Decertify** link in the Action column of the CAC table.
- The web form will display a prompt asking if you want to decertify the contact. Select **OK**.
- Once you select **OK**, the page will refresh, and the web form will move the contact to the bottom of the CAC Roster Table. The web form will pre-populate the decertification date, and you will no longer have the option to edit or decertify that CAC.
- Repeat these steps for every CAC you need to decertify.
- Select the **Submit** button to save all your changes.

To access further instructions for maintaining your CAC roster, visit the [Information for active CDOs](#) web page.

I am receiving the following error message when attempting to update my Organization Senior Official, CAC Project Director, or Secondary Contact: “The contact you are attempting to add is already assigned to a different organization.” How do I proceed?

This error message means that another organization lists the individual you are adding as one of your leadership contacts as a CAC on their CAC roster. Individuals cannot serve as a contact (i.e., Organization Senior Official, CAC Project Director, and Secondary Contact) for one CDO while serving as a CAC for another CDO.

To resolve this issue, the individual you are adding should contact their previous CDO and ask the organization to decertify them from that organization’s CAC roster. Once the organization decertifies the individual as a CAC for their organization, you can add the individual as one of your leadership contacts using the maintenance web form.

If this issue persists, email us at CACQuestions@cms.hhs.gov for assistance.

I am receiving the following error message when attempting to upload my CAC roster: “The CAC you are attempting to add is already assigned to a different organization.” What does this mean?

This error message means that another CDO lists the individual you are adding to your CAC roster as a CAC on their roster. Individuals cannot serve as a CAC for one CDO while serving as a CAC for another CDO.



To resolve this issue, the individual you are adding to your CAC roster should contact their previous CDO and ask the organization to remove them from the CAC roster. Once the organization does this, you can add the individual as one of your CACs on your CAC roster using the maintenance web form.

If this issue persists, email us at CACQuestions@cms.hhs.gov for assistance.

I am receiving the following error message when attempting to upload my CAC roster: “The CAC contact you are attempting to add is already listed as an active contact under this organization.” What does this mean?

This error message means that you already have the individual you are adding to your CAC roster listed on your existing roster. You can only list an individual once on your CAC roster using the same email address and/or CAC ID.

You can only edit a CAC's last name and email address. All other changes require you to decertify the CAC and add them again either manually or using the CAC Roster Template.

If you need to edit the individual's last name or email address:

1. On the maintenance web form, navigate to the CAC section of the “CDO Summary” page.
2. Locate the individual you need to modify and select the **Edit** link in the Action column of the CAC table.
3. On the “CAC Contact Edit” page, modify the CAC's last name or email address (these are the only editable fields) as needed.
4. Select the **Save and Return** button.
5. On the “CDO Summary” page, select the **Submit** button.

If this issue persists, email us at CACQuestions@cms.hhs.gov for assistance.

I am receiving the following error message when attempting to upload my CAC roster: “The CAC ID you are attempting to add is affiliated with a decertified contact in the system. You must assign this individual a new CAC ID to proceed.” What does this mean?

This error message means that you are attempting to add an individual you previously decertified from your CAC roster using the same CAC ID they were previously assigned.

Once you decertify an individual on your CAC roster, you will need to assign them a **new CAC ID** to add them back to your roster.

To add an individual back to your CAC roster:

1. Assign the individual a new CAC ID.
2. On the maintenance web form, navigate to the CAC section of the “CDO Summary” page.
3. Select the **Add CAC Roster** button.
4. On the “CAC Roster Upload” page, select whether you want to use the CAC Roster template. If you are only adding one CAC, you can select **No** and add the individual manually.
5. Add the contact and select the **Save and Return** button.
6. On the “CDO Summary” page, select the **Submit** button.

If this issue persists, email us at CACQuestions@cms.hhs.gov for assistance.

Other Administrative Data

The maintenance web form won't allow me to make any edits or updates. Why?

After you submit a CMS-CDO Agreement, CMS will review the agreement. While an agreement is under review by CMS, your record is locked, and you will be unable to edit your organization's information. After receiving a determination email from CMS, you will be able to edit your organization's information using the CDO Organizational Maintenance web form.

If you do not know if your organization submitted an agreement, contact us at CACQuestions@cms.hhs.gov.

How do I update our CDO Service Locations?

Your organization contacts must use the CDO Organizational Maintenance web form to update your organization information.

To update your CDO service locations:

1. Log into the [CDO Organizational Maintenance web form](#).



2. On the “CDO Summary” page, select the **Edit** button next to the Service Locations section.
3. Select the state you want to add or edit.
4. In the counties list, add or remove counties as needed and select the **Update Table** button.
5. Confirm your list in the Service Locations table and select the **Save and Return** button.
6. On the “CDO Summary” page, select the **Submit** button.

If you add or remove states from your service locations, the web form will prompt you to generate, sign, and upload a new CMS-CDO Agreement. Review the instructions for [How do I submit the signed CMS-CDO agreement?](#)

How do I update any of the leadership contacts for my CDO?

Your organization contacts must use the CDO Organizational Maintenance web form to update your organization information. Remember that your organization must have two leadership contacts on file.

To update any of your organization's contacts:

1. Log into the [CDO Organizational Maintenance web form](#).
2. In the Contact Information table on the “CDO Summary” page, select the **Edit** link or the **Replace** link next to the title of the role you want to update.
3. When you complete your edits, select the **Save and Return** button.
4. On the “CDO Summary” page, select the **Submit** button.

If you change your Organization Senior Official information, the CDO Organizational Maintenance web form will prompt you to generate and upload a new CMS-CDO Agreement. Review the instructions for [How do I submit the signed CMS-CDO agreement?](#)

How do I update our headquarters information?

You must use the CDO Organizational Maintenance web form to update your organization information. To update your headquarters' information:

1. Log into the [CDO Organizational Maintenance web form](#).

2. In the Organization Headquarters Information table on the “CDO Summary” page, select the **Edit** link.
3. On the “Edit Organization Headquarters Information” page, edit your information as needed.
4. When you complete your edits, select the **Save and Return** button.
5. On the “CDO Summary” page, select the **Submit** button.

If you change your headquarters' address, the web form will prompt you to generate and upload a new CMS-CDO Agreement. Review the instructions for [How do I submit the signed CMS-CDO agreement?](#)

Data Maintenance

What do we need to do to maintain our CDO status over the two-year certification period?

During your two-year certification period, your organization needs to:

- Certify your CAC staff annually and maintain your CAC Roster per Section II, 1 & 4 (Obligations and Conditions) of the CMS-CDO Agreement.
- Keep your CDO information current per Section II, 5 & 6 (Obligations and Conditions) of the CMS-CDO Agreement.

Per Section II, 1-4 (Obligations and Conditions) of the CMS-CDO Agreement, as authorized by 45 CFR 155.225, to certify your CACs, your organization must issue each CAC a unique CAC ID, ensure and confirm their completion of the annual federal assister training, and require that each CAC enter into a written, signed CDO-CAC model agreement. Your organization's contacts can then access the CDO Organizational Maintenance web form to upload and maintain your organization's CAC roster.

To keep your CDO information current, your organization must update your CDO record if any changes occur to the following: organization name, address, list of contacts, service locations, enrollment assistance type (open enrollment only or year-round), and specialty areas. Your organization's contacts can then access the CDO Organizational Maintenance web form to make these updates.

If you update your organization name, Organization Senior Official contact information, headquarters' address, or add or remove service locations, the CDO Organizational

Maintenance web form will prompt you to upload a new signed and dated CMS-CDO Agreement.

Why am I unable to log in to the maintenance web form?

When logging in to the [CDO Organizational Maintenance web form](#), you need to:

- Make sure your organization record lists you as one of your organization's leadership contacts: Organization Senior Official, CAC Project Director, or Secondary Contact.
- Use the email address entered on the application.
- Create an access code the first time you log in.

If you continue to experience technical issues, email us at CACQuestions@cms.hhs.gov and include the list of steps you were taking prior to receiving an error message along with an attached screenshot.

Note: New CDO applicants can only access the maintenance web form after receiving a Preliminary Approval email from CMS upon approval of your CDO application you submitted through the CDO Application web form. Moving forward, you will access the maintenance web form to keep your information up to date with CMS.

How do we reset our access code to the CDO Organizational Maintenance web form?

To reset your access code:

1. Select the **Forgot Access Code** link on the "Welcome" page.
2. On the "Forgot Access Code" page, enter your email address.
3. Select the **Send PIN** button.

CMS will send a PIN to the contact's email address on record. The PIN expires in 24 hours.

Once you receive a six-digit PIN:

1. Return to the [CDO Organizational Maintenance web form](#).
2. Select the **Forgot Access Code** link on the "Welcome" page.
3. Enter your PIN into the PIN field.
4. Select the **Continue** button.

On the “Reset Access Code” page:

1. Enter your new access code.
2. Confirm your new access code by entering it again.
3. Select a security question(s) and enter the corresponding response(s). Select the **Continue** button.
4. On the “Access Code Reset Confirmation” page, select the **Continue** button to proceed to the login page.

If you continue to experience issues logging into the CDO Organizational Maintenance web form, email us at CACQuestions@cms.hhs.gov and include the list of steps you were taking prior to receiving the error message along with an attached screenshot.

