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Title: **CMS Enrollment Assistance Bulletin, 2024-01¹**

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

I. Purpose

In preparation for the Open Enrollment Period beginning November 1, 2024 for the 2025 plan year (PY) in the individual market, the Centers for Medicare & Medicaid Services (CMS) has updated the annual training curriculum for Navigators, certified application counselors (CACs), and Enrollment Assistance Personnel (EAP), collectively referred to as “assisters,” in the Federally-facilitated Exchanges (FFE). The intent of this bulletin is to provide guidance on the training, certification, and recertification requirements and procedures for assisters in the FFEs.

Throughout this bulletin we refer to the training curriculum as the “2025 training.” It is delivered through the Marketplace Learning Management System (MLMS), with optional supplemental trainings provided throughout the year as part of the Marketplace Assister Webinar Series.²

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 only need to register for the series once per calendar year, and then will be automatically registered for all future webinars within the series, unless there is a special webinar that is not included in the regular assister webinar series.

II. Certification and Recertification Requirements for Navigators in the FFEs

Before carrying out any required or authorized Navigator functions, Navigators in the FFEs must, among other things:

- 1) Complete training that has been approved by CMS,³
- 2) Achieve a passing score on all approved certification examinations,⁴
- 3) Obtain continuing education and be certified and/or recertified on at least an annual basis,⁵ **and**
- 4) Meet any licensing, certification, or other standards prescribed by the State or Exchange, if applicable, as long as they don't prevent the implementation of the federal requirements.⁶

Training. All new FFE Navigators must successfully complete all the required 2025 Navigator training courses in order to become certified by the FFE. Depending on specific factors, as explained below, returning FFE Navigators may be eligible to complete the abbreviated 2025 Navigator recertification training to be recertified by the FFE.

Returning FFE Navigators are eligible to complete the abbreviated 2025 Navigator recertification training if **all** of the following criteria are met:

- 1) They were certified as a FFE Navigator during the final 2023-2024 budget period under an award for the 2021-2024 CMS Navigator grant period of performance,
- 2) They had an active PY 2024 FFE Navigator certification when the 2023-2024 budget period ended,⁷
- 3) They are currently affiliated with the same CMS Navigator grantee organization that they were certified under at the end of the 2023-2024 budget period, **and**
- 4) The same CMS Navigator grantee organization received another CMS Navigator grant award for the 2024-2029 period of performance or was approved for a No Cost Extension (NCE) under its 2021-2024 CMS Navigator grant.

FFE Navigators who are eligible to complete the abbreviated 2025 Navigator recertification training will still have access to the full suite of 2025 Navigator training courses and may choose to complete additional training courses, if desired.

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 The 2023-2024 budget period under the 2021-2024 CMS Navigator grant period of performance ended on August 26, 2024.

FFE Navigator Certification and Recertification. All new FFE Navigators must successfully complete the entire 2025 Navigator training and become certified by the FFE, including meeting any applicable state licensing or certification requirements, prior to performing any Navigator functions.

Returning FFE Navigators will have their PY2024 certification status expired on November 1, 2024. In order to continue performing any Navigator functions after October 31, 2024, all returning FFE Navigators who meet the criteria to take the abbreviated 2025 Navigator recertification training, as outlined above, must successfully do so, and be recertified by the FFE, including meeting any state certification requirements, prior to November 1, 2024.

All new and returning FFE Navigators who successfully complete either the full or abbreviated 2025 Navigator training will receive a Navigator certificate with an expiration date of October 31, 2025.

Use of Navigator ID Number. When registering for the 2025 Navigator certification or recertification training on the MLMS training platform, all individual FFE Navigators must ensure that they register for and complete the 2025 Navigator certification or recertification training using their unique 13-digit alphanumeric Navigator ID number assigned to them by the CMS Navigator grantee organization with which they are currently affiliated. FFE Navigators must use their unique Navigator ID in order to ensure that the Navigator certificate issued to them reflects their Navigator ID number and affiliation with a current CMS Navigator grantee organization.

Who Can Claim to Be an FFE-certified Navigator. We remind all CMS Navigator grantees that individual Navigators must not hold themselves out as FFE-certified Navigators, and must not carry out any Navigator functions (including outreach and education activities), until they have been trained and are certified by the FFE.⁸ Additionally, individuals may not hold themselves out as Navigators, or perform Navigator functions in an FFE, unless they are affiliated with a current CMS Navigator grantee and have a current certification that accurately reflects that affiliation.

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 may of course 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).

III. Certification and Recertification Requirements for Certified Application Counselors (CACs) in the FFEs

CMS regulations require that, prior to functioning as a CAC, all CACs in the FFEs must, among other things:

- 1) Successfully complete FFE-approved training,
- 2) Achieve a passing score on all FFE-approved certification examinations,
- 3) Obtain a certification from their CDO after successfully completing FFE-approved CAC training, **and**
- 4) Meet any licensing, certification, or other standards prescribed by the State or Exchange, if applicable, as long as they don't prevent the implementation of the federal requirements.⁹

The FFEs do not certify individual CACs. Rather, CDOs are responsible for certifying individual CACs who are associated with the CDO (as specified in the agreements between CMS and CDOs in the FFEs). CACs must enter into an agreement with the CDO that meets the requirements specified at [45 CFR § 155.225\(d\)\(6\)](#). CACs in the FFEs must be recertified by their CDO on at least an annual basis, after successfully completing recertification training.¹⁰

CAC Roster. All CDOs in the FFEs must maintain a roster of their active CACs using the [CDO Organizational Maintenance Web Form \(OMWF\)](#) during their agreement period with CMS.¹¹ In addition to being a required component of the CDO's record with CMS, maintaining an up-to-date roster is necessary for CACs in the FFEs to be able to access the annual certification training on the MLMS.

The CDO's contact(s), typically the CAC Project Director, must add and maintain a roster of its active CACs, which includes the CACs' full names, email addresses, and CAC IDs. New CDOs must add a roster and have at least one certified CAC on their roster within 90 days of receipt of their Welcome Packet email from CMS in order to avoid decertification/removal from the CDO Program. Existing CDOs who go without at least one certified CAC on their CAC Roster for a duration of 90 consecutive days during their typically two-year period of performance will be decertified/removed from the CDO

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, typically every 2 years, to remain active and continue providing enrollment assistance services. A CDO **MUST** renew before its certification expires. More information on the CDO renewal process can be found on the [CDO technical assistance page of Marketplace.CMS.gov](#).

Program. Once created, CDOs should use their roster to monitor their CACs' annual assister training completion dates from the MLMS and ensure they remain compliant with federal standards.¹²

To ensure that the CAC certification requirements are satisfied, 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 that the individual who wishes to become a CAC has successfully completed certification training and continues to meet all other certification requirements, and
- 4) Recertify returning CACs within one year of the date the CDO issued the CAC's current certification.

Training. All CACs who successfully completed the 2024 CAC training received a MLMS training certificate of completion with an expiration date of October 31, 2024. We encourage CDOs in FFEs to confirm that all new and returning CACs complete the 2025 CAC training prior November 1, 2024. This will help ensure that CACs have received the most up-to-date training and are certified or recertified prior to the start of the Open Enrollment Period for PY 2025 on November 1, 2024.

Returning FFE CACs are eligible to complete the 2025 abbreviated CAC recertification training if **all** the following criteria are met:

- 1) They successfully completed the 2024 FFE CAC training in the MLMS using their unique 13-digit alphanumeric CAC ID number,
- 2) They were certified as a CAC by their CDO for PY 2024 (with their certification status documented on the CDO's roster of active CACs), received a MLMS training Certificate of Completion from their CDO, and were not decertified during PY 2024, **and**
- 3) They remain affiliated with the same CDO which they were certified by for PY 2024.

FFE CACs who are eligible to complete the abbreviated 2025 recertification training will still have access to the full suite of 2025 CAC training courses and may choose to complete additional training courses, if desired.

¹² Additional instructions on how to create and maintain a CAC roster, as well as assign CAC IDs, are available in the [CDO OMWF User Guide](#) (June 2024).

Use of CAC ID Number: When registering for the 2025 CAC certification or recertification training on the MLMS training platform, all CACs must use their unique 13-digit alphanumeric CAC ID number assigned to them by the CDO with which they are affiliated in the CAC ID field on the “Welcome to the MLMS” profile page.

This will ensure that the CAC certificate issued to them reflects their current CAC ID number and their CDO affiliation. CACs **should not** register for the 2025 CAC training until they have confirmed with their CDO that they are using their current CAC ID.¹³

New organizations that apply to become CDOs¹⁴ and are approved to operate as CDOs during PY 2025 should instruct their CACs to wait to take the 2025 CAC certification training until after they have been issued a CAC ID number by their CDO and are listed on the organization’s roster of CACs in the OMWF.

IV. Certification and Recertification Requirements for EAPs in the FFEs

Before carrying out any required or authorized EAP functions, EAPs in the FFEs must, among other things:

- 1) Complete training that has been approved by CMS,
- 2) Achieve a passing score on all approved certification examinations,
- 3) Obtain continuing education and be certified and/or recertified on at least an annual basis, **and**
- 4) Meet any licensing, certification, or other standards prescribed by the State or Exchange, if applicable, as long as they don’t prevent the implementation of the federal requirements.

Training. All new EAPs must successfully complete all the required 2025 EAP training courses in order to become certified by the FFE. Depending on specific factors, as explained below, returning EAPs may be eligible to complete the abbreviated 2025 EAP recertification training to be recertified by the FFE.

Returning EAPs may be eligible to complete the abbreviated 2025 EAP recertification training, if **all** of the following criteria are met:

- 1) They successfully completed the 2024 EAP training in the MLMS using their unique 13-digit alphanumeric EAP ID number,

¹³ **Current CAC ID Numbers issued for plan year 2019 or later** are formatted as follows: state abbreviation, followed by **CDO** and a unique number (i.e., MICDO00000000). 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 for PY 2025 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.

- 2) They have an active EAP certification status for PY 2024 (active certification status documented on the EAP roster), **and**
- 3) They are currently employed as an EAP with Cognosante, LLC.¹⁵

EAPs who are eligible to complete the abbreviated 2025 recertification training will still have access to the full suite of 2025 training courses and may choose to complete additional training courses, if desired.

FFE EAP Certification and Recertification. All new EAPs must successfully complete the entire 2025 EAP training and become certified by the FFE, including meeting any applicable state licensing or certification requirements, prior to carrying out any enrollment assistance functions as an EAP.

Returning EAPs will have their PY2024 certification status expired on November 1, 2024. In order to continue performing any enrollment assistance functions as an EAP after October 31, 2024, all returning EAPs who meet the criteria to take the abbreviated 2025 training, as outlined above, must successfully complete it and any state certification requirements by November 1, 2024.

All new and returning EAPs who successfully complete either the full or abbreviated 2025 EAP training will receive an EAP certificate with an expiration date of October 31, 2025.

Use of EAP ID Number: When registering for the 2025 EAP certification or recertification training on the MLMS training platform, all EAPs must ensure that they register for and complete the 2025 EAP certification or recertification training by entering their unique 13-digit alphanumeric EAP ID number assigned to them by Cognosante, LLC in the EAP ID field on the “Welcome to the MLMS” profile page.

V. Frequently Asked Questions

1. Will the 2025 training for the Navigators, CACs, and EAPs in the FFEs be the same as the 2024 training?

For new Navigators, CACs, and EAPs in the FFEs, the 2025 certification training will be similar to the web-based certification training that CMS released last year with a continued emphasis on those modules assisters need to complete to carry out the required assister duties.

Returning FFE Navigators, CACs, and EAPs who meet the requirements outlined above in *Sections II, III, and IV*, respectively, related to the abbreviated recertification

¹⁵ Cognosante, LLC has been retained by CMS to operate the EAP program in all 28 FFE states, beginning in September 2024. More information about the EAP program in the FFEs is available on the [CMS website](#).

training are eligible to complete an abbreviated 2025 recertification training. All modules from the 2025 training are available for all assisters to take, even if they are not required courses for a certain type of assister.

2. Will a shorter recertification course offering be available this year for returning FFE Navigators?

Yes. Returning FFE Navigators can complete the abbreviated 2025 Navigator recertification training if **all** of the following criteria are met:

- 1) They were certified as a FFE Navigator during the final 2023-2024 budget period under the 2021-2024 CMS Navigator grant period of performance,
- 2) They had an active PY 2024 FFE Navigator certification when the 2023-2024 budget period ended on August 26, 2024,
- 3) They are currently affiliated with the same CMS Navigator grantee organization that they were certified with during the 2023-2024 budget period, **and**
- 4) The same CMS Navigator grantee organization received another CMS Navigator grant award for the new 2024-2029 period of performance or was approved for a No Cost Extension (NCE) under its 2021-2024 CMS Navigator grant.

3. Will a shorter recertification course offering be available this year for returning FFE CACs?

Yes. Returning FFE CACs are eligible to complete an abbreviated CAC recertification training, if **all** the following criteria are met:

- 1) They successfully completed the 2024 FFE CAC training in the MLMS using their unique 13-digit alphanumeric CAC ID number,
- 2) They were certified as a CAC by their CDO for PY 2024 (active certification status documented on the CDO's roster of CACs), received an MLMS training Certificate of Completion from their CDO, and were not decertified during PY 2024; **and**
- 3) They remain affiliated with the same CDO which they were certified by for PY 2024.

4. Will a shorter recertification course offering be available this year for returning EAPs?

Yes. Returning EAPs are eligible to complete an abbreviated EAP recertification training, if **all** of the following criteria are met:

- 1) They successfully completed the 2024 EAP training in the MLMS using their unique 13-digit alphanumeric EAP ID number,

- 2) They have an active EAP certification status for PY 2024 (active certification status documented on the EAP roster), **and**
- 3) They are currently employed as an EAP with Cognosante, LLC.

5. What are the FFE assister training courses for 2025, and how many hours will be needed to complete the training?

The 2025 FFE assister training includes the following courses where “R” stands for required and “O” stands for optional:

Course Title	New FFE Navigators, CACs, and EAPs	Returning FFE Navigators, CACs, and EAPs
001 Training Overview	R	R
002 Health Coverage Basics	R	O
003 Affordable Care Act Basics	R	O
004 Privacy, Security, and Fraud Prevention Standards	R	R
005 Marketplace Application Essentials	R	R
006 Serving Vulnerable and Underserved Populations	R	R
007 Cultural Competence and Language Assistance	R	R
008 Working with Consumers with Disabilities	R	R
009 Customer Service Standards and Community Outreach	O	O
010 Coverage to Care Assistance	O	O
011 Complex Application Issues	O	R

FFE Navigators, CACs, and EAPs 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 4-5 hours for the abbreviated training and 6-7 hours to complete the full training.

6. 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 timeframe determined by CMS, typically a two (2)-year period.¹⁶ For instance, CDOs that became certified in 2023 will be due for CDO Renewal in 2025. Prior to the end of a CDO's 2-year certification period, the CMS-CDO Agreement should be renewed if the CDO wishes to continue its CDO functions.

CMS will email the CDO contacts when it's time to renew. In preparation for renewal, CDOs should ensure that the organization's contact information is up-to-date in the CDO Organizational Maintenance Web Form.

7. 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 individual CACs as part of the recertification process. However, each CDO must ensure that its agreements with individual CACs are consistent with 45 CFR § 155.225(d)(6) and the CDO's agreement with CMS. If desired, a CDO may choose to enter into a new agreement with its CACs as part of the CACs' recertification in accordance with the CDO's own internal policies and procedures for overseeing the individual CACs it certifies.

In addition, a CDO in an FFE should ensure that any agreement it has with its CAC is in effect and has not expired. If the CDO's agreement with its CAC has expired, the individual CAC is no longer authorized to serve as a CAC, and the CDO must enter into a new agreement in order for the individual to serve as a CAC again, as required by federal regulations at 45 CFR § 155.225(d)(6).

8. 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 FFE CDO that the CAC is affiliated with. Each FFE CDO must [assign CAC ID numbers](#), [maintain a CAC roster](#) using the [CDO Organizational Maintenance Web Form \(OMWF\)](#), and ensure that all CACs it certifies or recertifies have completed the necessary federal and any state

¹⁶ 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.

training requirements, consistent with the CDO's agreement with CMS. Individual CACs should use their current CAC ID to access certification training and check with the CDO they are affiliated with to learn how to report successful completion of required training.

Please remember that the official CAC certification is not issued by the FFEs or by the MLMS training website; it is issued only by the CDO with which the CAC is affiliated. CDOs should use the MLMS training completion date noted on the CAC roster to confirm successful completion of the required training.

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

FFE CDOs must do all of 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 CAC's agreement with the organization (for 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) Ask each individual who is fully compliant with these criteria if that individual is seeking to become certified or recertified.
- 3) For individuals who would like to be certified or recertified:
 - Require that the individual disclose to the CDO any relationships the individual has with qualified health plans or insurance affordability programs (e.g., Medicaid, CHIP), or other potential conflicts of interest, in accordance with 45 CFR § 155.225(d)(2),¹⁷
 - Assign each CAC a unique 13-digit alphanumeric CAC ID number,

¹⁷ Organizations should be aware that 45 CFR § 155.225(g)(2) establishes that an individual or entity serving as a CAC or CDO must not receive any consideration directly or indirectly from a health insurance or stop loss insurance issuer in connection with the enrollment of any individuals in a qualified health plan (QHP) or non-QHP. In an FFE, however, no health care provider shall be ineligible to operate as a CAC or CAC designated organization solely because it receives consideration from a health insurance issuer for health care services provided.

- Maintain a roster of the organization's CACs using the CDO Organizational Maintenance Web Form,
 - Ensure that the individual takes the 2025 CAC training and provides the CDO with proof of successful completion (e.g., training completion date on CAC roster and the training certificate),
 - Enter into an agreement (or if necessary, a new agreement) with the individual that is consistent with 45 CFR § 155.225(d)(6) (see FAQ #6 above), and
 - Issue a new official CAC certificate.
- 4) If a CDO is fulfilling its duty under 45 CFR § 155.225(d)(2) to inform consumers of any relationships the organization has with qualified health plans or insurance affordability programs, or other potential conflicts of interest, by providing this information to consumers through its individual CACs, then the CDO must disclose such relationships to its certified CACs. Each year, the CDO should re-disclose such relationships to all its recertified CACs to ensure that this information is current when a CAC provides this information to consumers (See 45 CFR § 155.225(d)(2) for disclosure requirements).

Organizations must not issue any CAC certifications or recertifications until all steps required for certification or recertification are completed, including ensuring that individuals take the 2025 CAC training and show proof of successful completion.

10. 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?

Once an individual CAC's certification has expired or has been withdrawn by a CDO, the former CAC must immediately cease holding themselves out to the public (verbally and in any written or electronic materials) as a CAC and immediately cease providing CAC services to consumers.

When the individual CAC's certification or agreement has expired or has been withdrawn, the CDO must also decertify the individual on the CAC roster.

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 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.

11. What resources are available to assisters other than the required training?

Beyond the web-based certification training, CMS will provide optional supplemental trainings through the Marketplace Assister Webinar Series and the Marketplace Assister Microlearning modules. These additional training opportunities will ensure that assisters in the FFEs are up to date on any policy changes or other relevant developments impacting Navigators, CACs, and EAP in the FFEs, or the consumers they serve. We are continuing to identify and implement new ways for assisters to better access and use the [technical assistance information and resources provided by CMS](#).

Direct questions about the requirements included in this bulletin as follows:

- **Navigators** should contact their Navigator grant Project Director who can reach out to their CMS Project Officer, if necessary.
- **Certified Application Counselors** should send questions via email to CACQuestions@cms.hhs.gov.
- **Enrollment Assistance Personnel** should send questions via email to EAPQuestions@cms.hhs.gov.