

DEPARTMENT OF HEALTH &  
HUMAN SERVICES  
Centers for Medicare & Medicaid  
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Baltimore, Maryland 21244-1850



**CENTER FOR MEDICARE**

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**DATE:** December 9, 2024

**TO:** All Medicare Advantage Organizations, Prescription Drug Plans,  
1876 Cost Plans, and Demonstrations

**FROM:** Jennifer R. Shapiro, Director, Medicare Plan Payment Group  
  
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**SUBJECT:** New MARx Role for Agents and Brokers – Action Required  
by March 15, 2025

In 2020, the Centers for Medicare & Medicaid Services (CMS) began allowing agents and brokers to access the Medicare Advantage Prescription Drug (MARx) system for the purpose of verifying an individual's enrollment eligibility in Medicare Advantage (MA) and prescription drug plans (PDPs) to facilitate individual enrollment requests. Agents and brokers were granted such access by Medicare Advantage Organizations (MAOs), Prescription Drug Plan Sponsors, 1876 Cost Plan organizations, and entities that participate in Demonstrations (collectively, "plans") as downstream entities of those organizations.

CMS' Information Systems Acceptable Risks and Safeguards standards (<https://security.cms.gov/policy-guidance/cms-acceptable-risk-safeguards-ars>) provide that CMS systems employ the principle of "least privilege," allowing only authorized access for users that is necessary to accomplish assigned organizational tasks. The new MARx role for agents and brokers discussed below is in line with these standards and will ensure that the level of access granted to agents and brokers in MARx will be limited to the data needed to determine if an individual is eligible to enroll in a Medicare health and/or prescription drug plan and help facilitate placement in the most appropriate plan for the individual. This change will have minimal impact to the Medicare plan enrollment process.

**New EPOC Guidance for granting Agents and Brokers MARx Access**

This memo provides guidance to plans' External Points of Contact (EPOC) regarding new procedures that must be completed by **March 15, 2025**, for ensuring agents and brokers have the appropriate level of access to eligibility and enrollment data in the MARx system. In accordance with 42 CFR §§ 417.428, 422.504(i), 422.2274(c) and (g), 423.505(i) and 423.2274(c) and (g), plans are responsible for overseeing the first tier, downstream, and related entities that represent them, and for ensuring

that agents and brokers abide by all applicable State and Federal laws, regulations, and requirements. This includes ensuring compliance with the revised MARx access requirements described in this memo.

Because the MARx system heretofore has not had a specific user role for agents and brokers to access Medicare beneficiary eligibility information, CMS has developed a new user role named “MAPD Agent” that will be available through Identity Manager (IDM) beginning **December 16, 2024**. The view-only role is designated for agents and brokers affiliated with a Medicare health or prescription drug plan who query and view beneficiary demographic, enrollment, and Medicare eligibility information.

### **Rules of Behavior and Responsibilities of the Plan’s EPOC**

CMS is committed to maintaining the integrity, privacy, and security of health care data in accordance with applicable laws and regulations. Provisions of the Privacy Act of 1974 and the Health Insurance Portability and Accountability Act of 1996 (HIPAA) place restrictions on the disclosure of individually identifiable Medicare eligibility, demographic, enrollment, premium, premium withhold, and payment data. The plan’s EPOC is an employed representative of an MAO or PDP (or other plan types mentioned previously) whose responsibility is to approve/reject, maintain, manage, and certify their company’s employees’ and/or first tier, downstream, or related entities’ access to MARx. All users granted access by the plan’s EPOC may use Medicare beneficiary data only to conduct Medicare business in accordance with the plan’s contract with CMS; any other use would be prohibited and potentially subject a user, and possibly also the plan with oversight responsibility, to having access revoked.

More information on the Rules of Behavior regarding a plan’s EPOC can be found on the CMS.gov webpage:

<https://www.cms.gov/data-research/cms-information-technology/access-cms-data-application/plan-connectivity-preparation>

### **Transitioning Existing Agents and Brokers to the New MAPD Agent Role**

To transition agents and brokers who may have access to MARx under one of the existing MARx user roles, the plan’s EPOC must perform an internal review of all MARx users that the plan manages. Any user that the plan’s EPOC identifies as an agent or broker must be transitioned to the new MAPD Agent role between December 16, 2024, and March 15, 2025.

The plan’s EPOC is expected to include the following steps when performing an internal review:

- Identify and verify with agents/brokers that MARx access is needed
- Communicate with agents/brokers who are required to transition to the new role
- Facilitate registration and/or proper role selection in IDM
- Remove or disable access for agents/brokers who are non-responsive or no longer require access to MARx

After completion of the user review and transition, a plan’s EPOC is required to send an email to CMS at [DPOEPCS@cms.hhs.gov](mailto:DPOEPCS@cms.hhs.gov) verifying completion and including a list in the form of an Excel spreadsheet indicating which users managed by the plan’s EPOC were and were not transitioned. The

list of users should include first and last name, IDM user ID, email address, and transition status (maintains current role, transitioned to MAPD Agent, other role change, or deleted user).

The subject line of the email should read as follows: “Agent/Broker Transition Project 2024 – XXXXX”, where XXXXX is any contract number that the EPOC is associated with. The list attached to the email must be encrypted with a password in the following format:

EPOC#XXXXXX, where XXXXX is the same contract number used for the subject line

### **New Agent and Broker Access to MARx**

In summary, between December 16, 2024 and March 15, 2025, plan EPOCs are required to designate all agents and brokers who currently have access or are requesting access to MARx the role of “MAPD Agent.” After March 15, 2025, plan EPOCs must ensure that only the “MAPD Agent” role is used to designate agents and brokers. The MAPD Agent role is described in the EPOC Rules of Behavior and can be downloaded using the following link: <https://www.cms.gov/files/document/epoc-rules-behavior-rob.pdf>

Plan EPOCs who require assistance in determining the appropriate MARx user role for their users should contact the MAPD Help Desk at 1-800-927-8069 or [mapdhelp@cms.hhs.gov](mailto:mapdhelp@cms.hhs.gov), or the MARx Information Systems Security Officer (ISSO) at [DPOEPOCS@cms.hhs.gov](mailto:DPOEPOCS@cms.hhs.gov) and should not grant agents and brokers access to one of the other existing MARx user roles.