

Programmatic Guidance for Conditionally Approved Vendors of Plan Year 2021 Federally-facilitated Marketplace Agent and Broker Training

February 10, 2020

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1.0 INTRODUCTION

The Centers for Medicare & Medicaid Services (CMS) developed this document, titled “Programmatic Guidance for Conditionally Approved Vendors of Plan Year 2021 Federally-facilitated Marketplace (Marketplace) Agent and Broker Training” (hereafter “Programmatic Guidance”), to provide guidance on training content and delivery standards to which vendors conditionally approved¹ by CMS under 45 C.F.R. § 155.222 must adhere. The scope of this document includes general program information, training development options, timelines and milestones, marketing and outreach guidelines, pricing requirements, and Help Desk and technical assistance requirements. Vendors are encouraged to review this document in detail and may send questions about this guidance to the Center for Consumer Information & Insurance Oversight (CCIIO) Vendor Training Mailbox (AgentBrokerVendor@cms.hhs.gov).

2.0 PROGRAM INFORMATION

Pursuant to 45 C.F.R. § 155.220(d), an agent or broker who assists individuals with eligibility determinations and enrollment in qualified health plans (QHPs) through the Marketplace,² or in applying for advance payments of the premium tax credit and cost-sharing reductions, must be registered with the Marketplace, receive training in the range of QHP options and insurance affordability programs, and agree to comply with Marketplace privacy and security standards. Training helps ensure that agents and brokers operating within the Marketplace have the requisite knowledge to inform consumers about the Marketplace and insurance affordability programs and to help them receive eligibility determinations, compare plans, and enroll in QHP coverage offered through the Marketplace. Agents and brokers who assist only employers and employees through the Small Business Health Options Program (SHOP) are strongly encouraged, but not required, to complete training.

The vendor training program was first implemented for plan year 2016³ when agents and brokers had the option of satisfying the Marketplace training requirement by completing training offered through the platform of an approved vendor, or completing the Marketplace training offered through the CMS platform, known as the Marketplace Learning Management System (MLMS).⁴ Approximately 5,300 agents and brokers completed Marketplace training for plan year 2019 through an approved vendor. For plan year 2020, there is one CMS-approved vendor currently offering training to agents and brokers.

¹ For the purposes of this document, approval as a CMS vendor for plan year 2021 means approval to train agents and brokers to assist consumers with obtaining health coverage through the Marketplace for plan year 2021.

² When used in this document, the term “Health Insurance Marketplace” or “Marketplace” refers to Federally-facilitated Marketplaces (FFMs), including FFMs where states perform plan management functions and State-based Marketplaces on the Federal Platform (SBM-FPs).

³ 45 C.F.R. § 155.020 defines “plan year” as a consecutive 12-month period during which a health plan provides coverage for health benefits. A plan year may follow a calendar year but is not required to be the same as a calendar year.

⁴ 45 C.F.R. § 155.222 authorizes approved third-party vendors to provide Marketplace training to agents and brokers to satisfy the training requirement described in 45 C.F.R. § 155.220(d)(2).

3.0 REQUIREMENTS FOR APPROVED VENDORS

To become an approved vendor of Marketplace agent and broker training,⁵ an organization must:

1. Complete and submit an application to demonstrate that it meets specified criteria to host training for Marketplace agents and brokers.
2. Receive conditional approval from CMS.
3. Offer CMS-developed training content for Marketplace agents and brokers or develop training content based on the requirements provided by CMS.
4. Offer continuing education unit (CEU) credits in at least five states where an FFM or SBM-FP is operating.
5. Demonstrate the ability to collect, store, and share agent and broker training completion data with CMS.
6. Execute the Agent Broker Vendor Agreement with CMS.
7. Receive final approval from CMS to perform the applicable training and information technology (IT) functions required to launch live training for agents and brokers.⁶
8. Provide technical support to Marketplace agents and brokers completing vendor training.
9. Ensure ongoing compliance with CMS system standards and applicable regulatory requirements.

4.0 TRAINING CONTENT REQUIREMENTS FOR PLAN YEAR 2021

For plan year 2021, vendors offering the Marketplace training referenced in 45 C.F.R. § 155.222(b)(2) must choose one of the following training development options:

- **Option 1:** Vendor offers CMS-developed Marketplace training curriculum.
- **Option 2:** Vendor creates Marketplace training curriculum and exams based on CMS content requirements.

In Section III of the Plan Year 2021 Vendor Application, prospective vendors were asked to indicate which training development option they intend to pursue. For planning purposes, conditionally approved vendors will be asked to confirm this selection by February 4, 2020.

For both options, the vendor's training must be approved for CEUs in at least five states where the Marketplace is operating. Each conditionally approved vendor must provide CMS a list of FFM and SBM-FP states that have approved the vendor's agent and broker training prior to the go-live date for plan year 2021 training. CMS will provide a submission deadline at a future date.

4.1 Option 1: Vendor Offers CMS-Developed Training Curriculum

The CMS-developed training content for Marketplace agents and brokers consists of two curricula: the **Core Curriculum** (includes both Individual Marketplace and SHOP) and

⁵ 45 C.F.R. § 155.222(b) outlines the requirements to become an approved vendor.

⁶ See "Technical Guidance for Conditionally Approved Vendors of Plan Year 2021 Federally-facilitated Marketplace Agent and Broker Training."

Training for Returning Agents and Brokers. The **Core Curriculum**, described below in Exhibit 1, includes both the Individual Marketplace curriculum and the SHOP curriculum. The Individual Marketplace curriculum consists of three courses: Basics, Individual Marketplace, and Privacy & Security. The SHOP curriculum consists of only one module. Each course within the Individual Marketplace curriculum culminates in an exam; however, because the SHOP curriculum is optional, it will not contain an exam. To facilitate CEU accreditation, vendors will have the option to create their own SHOP exam for plan year 2021.

Exhibit 1: Core Training Curriculum for Marketplace Agents and Brokers

Curriculum	Courses	Modules
Individual Marketplace Curriculum	Basics	Module 1: Affordable Care Act Basics
		Module 2: Marketplace Basics
	Individual Marketplace	Module 1: Eligibility for Enrolling in a QHP
		Module 2: Eligibility for Insurance Affordability Programs
		Module 3: Enrolling in a QHP
	Privacy and Security	Module 1: Privacy Standards and Definitions
		Module 2: Protecting and Handling Personally Identifiable Information
		Module 3: Information Security
SHOP Curriculum	SHOP	Module 1: SHOP

In addition, CMS offers **Training for Returning Agents and Brokers** as an option for agents and brokers who successfully completed Individual Marketplace training (either Core or Training for Returning Agents and Brokers) for plan year 2020.

Training for Returning Agents and Brokers will consist of a 60 minute “What’s New for Returning Agents and Brokers” module, which will include only new policy, operational, and programmatic changes impacting agents, brokers, and consumers for plan year 2021. After completing this required module, agents and brokers must complete the mandatory exam and achieve a passing score of 70% or higher. The exam will focus on content covered in the “What’s New” module, but may include questions on other important topics for agents and brokers.

The Training for Returning Agents and Brokers curriculum also includes three optional review courses: Basics Review, Individual Marketplace Review, and Privacy & Security Review. To facilitate CEU accreditation, vendors are permitted to make the three optional review courses required in the vendor curriculum for plan year 2021. A SHOP Review module will not be offered.

Exhibit 2: Plan Year 2021 Curriculum Structure for Returning Agents and Brokers

Modules	Requirement	Duration
Introduction for Returning Agents and Brokers	Required	5 minutes
What's New for Returning Agents and Brokers	Required	60 minutes
Returning Agents and Brokers What's New Exam	Required	15 minutes
Individual Marketplace Privacy and Security Agreement	Required	N/A
Individual Marketplace General Agreement	Required	N/A
Basics Review for Returning Agents and Brokers	Optional	20 minutes
Individual Marketplace Review for Returning Agents and Brokers	Optional	30 minutes
Privacy and Security Review for Returning Agents and Brokers	Optional	10 minutes

Vendors are required to offer both curricula for plan year 2021 on a web-based platform and/or learning management system (LMS). CMS will provide vendors with the applicable Sharable Content Object Reference Model (SCORM) 2004 HTML5 training packages, which include lesson modules, exams, exam answer keys, and a list of resources, approximately 30 days prior to the plan year 2021 go-live date, which is tentatively scheduled for August 1, 2020. Prior to go-live, vendors must obtain CEU accreditation in at least five states where an FFM or SBM-FP is operating.

4.2 Option 2: Vendor Creates Training Curriculum Based on CMS Content Requirements

The vendor will plan, create, and deliver CMS-approved Marketplace training content and exams for agents and brokers according to the requirements outlined throughout this document. For plan year 2021, vendors will not be allowed to integrate supplemental content into CMS-developed modules. While vendors are not permitted to modify CMS training content (e.g., add or change pages within CMS' approved modules), they may supplement the content with additional, standalone content. Vendors that wish to supplement the training content provided by CMS must develop and offer their own training modules separate from the CMS-developed modules. Vendors must gain prior written approval from CMS to pursue this option. Applicants who do not meet CMS' standards for quality assurance during the training development and review process will be required to offer CMS-developed training content for plan year 2021 if they are otherwise approved as a vendor.

To facilitate the training content development and review process, conditionally approved vendors must comply with the tasks and timelines outlined in Exhibit 3 and described in detail below.⁷

⁷ Please note that these dates are subject to change at CMS' discretion. CMS will provide vendors with an updated project schedule as needed to reflect any shifts in tasks, deadlines, or milestones.

Exhibit 3: Option 2 Vendor Training Development, Review, and Approval Process

[illegible]

Each conditionally approved vendor developing its own training content is required to provide CMS with a set of **design documents** for each proposed training module by **February 18, 2020**. These design documents should include detailed outlines and information sources the vendor expects to use to develop content for each topic. The vendor may also choose to provide graphics for CMS' review. Upon receipt, CMS will review this information and provide the vendor with detailed feedback. If CMS disapproves a vendor's training design documents, the vendor must submit a revised version that incorporates the necessary edits by the date specified.

The vendor must then submit a **version 1 storyboard** for each proposed training module for CMS review and approval by **March 17, 2020**. CMS subject matter experts will review vendor storyboards to ensure that the content for each module aligns with the requirements outlined throughout this document and that it is consistent with the CMS-developed agent and broker training curriculum. CMS will then provide the vendor with written comments and feedback.

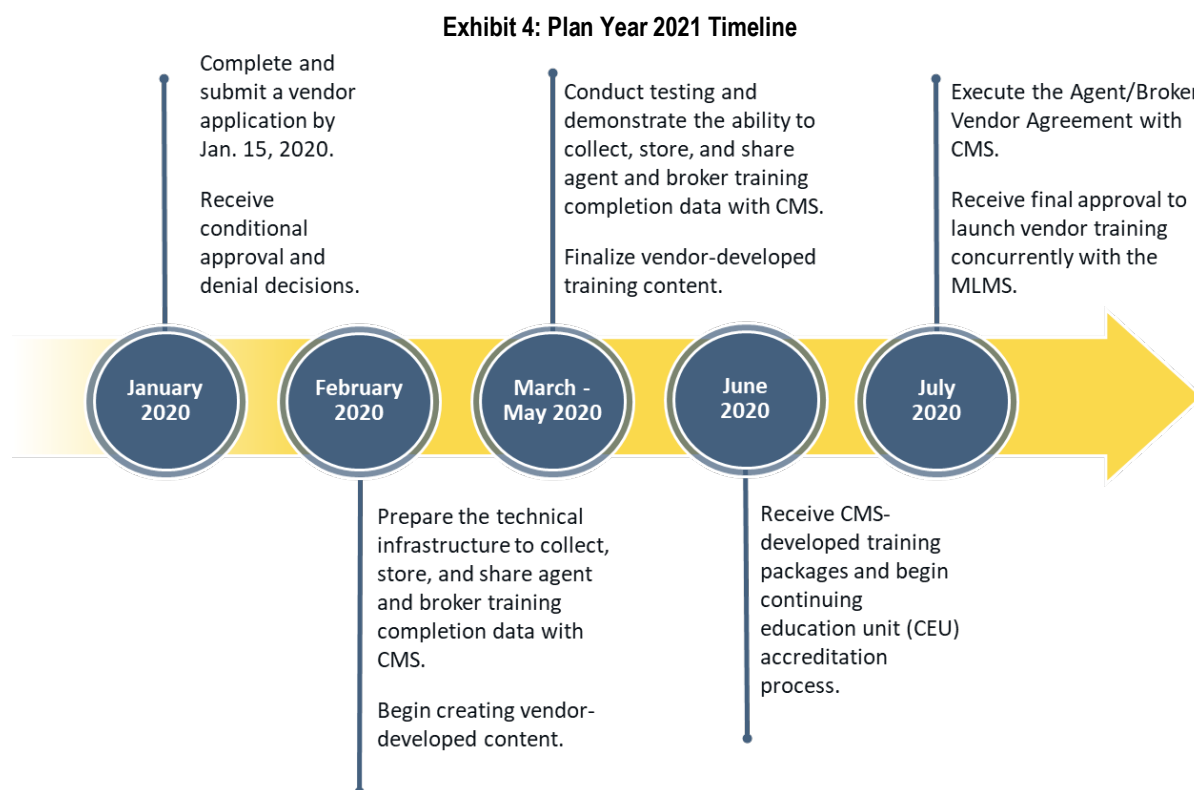
Adjudicating the feedback provided by CMS, each vendor must then update the storyboards and program the training modules into its online creation environment. The vendor must submit **version 2 storyboards** for CMS review and approval by **June 23, 2020**. In order for CMS to review and provide comment, the vendor must generate a text-editable Microsoft Word version of its online content. CMS will then confirm that the vendor incorporated all recommended changes, inserting additional edits and comments as needed. If the version 2 storyboards require significant revisions, CMS may request that the vendor submit a revised version for additional review.

After incorporating all necessary edits, the vendor must load the **online training** modules into its LMS for CMS testing by **July 6, 2020**. When the modules are available, the vendor should send an email to the Vendor Training Mailbox, notifying CMS that the final content is available for testing on the LMS test site. CMS will access the LMS test site for each vendor and test the training content, including the exams, to confirm that the vendor has appropriately incorporated all edits and comments.

4.3 Timeline

The estimated soft launch date for Marketplace training for agents and brokers is **July 30, 2020**, with a public go-live scheduled for **August 1, 2020**. Vendors are not permitted to announce that training is live until they receive written approval from CMS.

Exhibit 4 provides an overview of the implementation timeline for plan year 2021. However, the timeframe for the release of each vendor's training is dependent on CMS' approval of all training content and on the vendor's ability to meet CMS' technical standards for the security and operations of their IT systems (see "Technical Guidance for Conditionally Approved Vendors for the Federally-facilitated Marketplace Agent and Broker Training Program for Plan Year 2021"). In addition, vendors are responsible for confirming that training content and exams meet CEU standards for at least five states in which an FFM or SBM-FP is operating. Any delays in the process outlined above may result in a delay to the vendor's official go-live date for plan year 2021.



5.0 QUALITY ASSURANCE EXPECTATIONS

CMS expects each conditionally approved vendor to assume responsibility for the quality of its Marketplace agent and broker training curriculum. If a vendor chooses to create its own Marketplace training curriculum and exams based on CMS content requirements or intends to supplement CMS-developed content, it must conduct a thorough quality assurance review on all content prior to submission. This review should include each of the elements identified in Exhibit 5. CMS reviewers will not correct typographical or grammatical errors in any supplemental content that is submitted by a vendor. Appendix A contains a Style

Guide that conditionally approved vendors must comply with to ensure correct and consistent use of commonly used acronyms, terms, and phrases. It also includes style guidelines for how to refer to the Health Insurance Marketplace program. If a vendor's created or developed content does not meet CMS' quality standards, it will be disapproved by CMS and vendors will be required to use the CMS-developed content.

Exhibit 5: Required Elements of Quality Assurance Review

Elements of Quality Assurance Review
• Compliance with Style Guide and formatting standards • Structure, organization, and coherence of the document • Use of sound logic and clear conveyance of the document's key points • Compliance with industry accepted plain language guidelines • Correct punctuation, grammar, and spelling • Absence of typographical errors

In addition, CMS requires each approved vendor to include the following standard disclaimer on the initial landing page of its Marketplace agent and broker training curriculum.

“Attention: This website is operated by [insert Vendor name] and is not the Marketplace Learning Management System (MLMS) website operated by the Centers for Medicare & Medicaid Services (CMS). CMS has approved the content of the Marketplace agent and broker training offered through this website. Successful completion of the training will satisfy the training component of the registration requirement for agents and brokers who wish to participate in the Marketplace. Please note that CMS does not assume responsibility for any errors that may exist within this content to the extent that such content has not been approved by CMS.”

6.0 REQUIREMENTS FOR TECHNICAL ASSISTANCE AND HELP DESK SUPPORT

The vendor must provide technical assistance via an English language Help Desk for learners utilizing its LMS to complete Marketplace training. The Help Desk should be appropriately staffed to ensure that inquiries can be answered within 24 hours, Monday through Friday. This Help Desk must be operational by the time the vendor's Marketplace training for plan year 2021 is live and continue for as long as the vendor is approved to host Marketplace training. In order to provide support compatible with and comparable to CMS' Help Desks, the vendor's Help Desk should, at a minimum, provide phone support to address system access issues and email support for other inquiries.

The vendor must ensure its Help Desk representatives are trained to respond to a variety of inquiries from agents and brokers who utilize or attempt to access the vendor's LMS to complete Marketplace training. Inquiries from agents and brokers that relate to Marketplace registration or the training hosted by CMS should be sent to the Agent/Broker Email Help Desk at FFMProducer-Assister@cms.hhs.gov. The vendor must provide a representative to attend monthly Help Desk coordination calls to coordinate on the handling of inquiries that fall outside the scope of both the vendor's and CMS' LMS.

The vendor's Help Desk should be prepared to respond to inquiries on the following topics:

- Pricing and continuing education information related to the vendor's Marketplace training
- Accessing the vendor's website and LMS to create an account and complete Marketplace training
- Navigation of the vendor's website and LMS
- Training content for the Individual Marketplace and SHOP
- Marketplace training and registration requirements for agents and brokers
- Other troubleshooting related to use of the vendor's LMS to complete Marketplace training

The vendor's Help Desk should proactively monitor the inquiries it receives and ensure that the information and responses provided to agents and brokers are accurate and timely. Technical problems and other issues that limit access to the vendor's Marketplace training and/or indicate a defect within the vendor's LMS must result in a corrective action plan to eliminate the defect and maintain access to Marketplace training. The vendor must document these issues and recurring problems, and proactively notify CMS of any situation that may impact the accessibility of its Marketplace training. The vendor will advise CMS, in advance whenever possible, when the vendor becomes aware of any indication that a potential problem may be developing. In the case of a known impending problem, the vendor shall be forthcoming with CMS to address the risks and identify mitigation strategies.

7.0 GUIDELINES FOR MARKETING AND OUTREACH

The vendor must create and implement strategies to communicate and launch CMS-approved Marketplace training when it becomes operational prior to the Open Enrollment period for plan year 2021. The communications and roll-out activities must provide sufficient, timely training and registration information to meet the needs of agents and brokers. The information may be delivered through email, newsletters, or any other reasonable methods. The vendor must work with CMS on the roll-out of its Marketplace training and outreach to agents and brokers to ensure appropriate coordination and messaging about both the vendor's Marketplace training and the Marketplace training offered by CMS. CMS may request a marketing and communications plan from conditionally approved vendors.

Vendors must abide by the guidelines outlined below for all marketing and outreach materials distributed to potential agents and brokers:

- Vendors may not refer to themselves as "approved" to provide Marketplace agent and broker training for plan year 2021 until they have completed each of the requirements to receive CMS' final approval (e.g., submission of a signed Agent/Broker Vendor Agreement, successful completion of the information technology readiness review, and receipt of approval for go-live).
 - Until receipt of CMS' final approval, vendors may refer to their organization as having received "conditional approval" to operate as a vendor for the Marketplace Agent and Broker Training program for plan year 2021.
 - Upon receiving final, written approval from CMS, vendors may refer to their organizations as having received CMS' approval to operate as a vendor for the Marketplace Agent and Broker Training program for plan year 2021.

- Marketing materials may not provide a specific date when a vendor’s Marketplace agent and broker training curriculum will be available to agents and brokers that wish to participate in the Marketplace for plan year 2021.
- Marketing materials may not imply that CMS has made a determination regarding the value of the vendor organization’s agent and broker training relative to that of other vendors or the MLMS (e.g., references to CMS determining that a vendor is the “best” or “premier” option). CMS has only made an approval determination based on the vendor meeting the required criteria to participate in the Marketplace agent and broker training Program for plan year 2021.
- Marketing materials may describe the fee the vendor intends to charge for completion of Marketplace Agent and Broker Training. This includes both the Core Curriculum (Individual Marketplace, SHOP, or both) and Training for Returning Agents and Brokers.
- Marketing materials may reference the ability of an agent or broker who successfully completes vendor training to receive CEU credits, depending on the state or states in which the agent or broker operates.
- Marketing materials must direct agents and brokers to the CMS CCIIO Resources for Agents and Brokers in the Health Insurance Marketplaces webpage (<http://go.cms.gov/CCIIOAB>) for information on the requirements and process for completing Marketplace agent and broker registration and training for plan year 2021.

8.0 PRICING REQUIREMENTS

Vendors may vary the price of Marketplace agent and broker training depending on the curriculum the user completes (i.e., Individual Marketplace, SHOP, and/or Training for Returning Agents and Brokers) and the number of CEUs the learner receives. Vendors are also permitted to offer discounted pricing to members of their organization. Price must be comparable to similar trainings that are currently available, as shown in Exhibit 6, and must comply with all applicable state requirements.

Exhibit 6: Price Ranges from Plan Year 2020 Marketplace Agent and Broker Training

Curriculum	With CEUs	Without CEUs
Core Individual Marketplace Training	\$88	\$55
SHOP Training	N/A	N/A
Combined Individual Marketplace and SHOP Training	N/A	N/A
Training for Returning Agents and Brokers	\$58	\$20

Conditionally approved vendors must submit their final pricing structure for Marketplace agent and broker training to CMS for review and approval prior to the go-live date for plan year 2021 training. CMS will provide a submission deadline and template at a future date.

Once CMS has approved a vendor’s pricing structure for plan year 2021 training, the vendor may only change its submitted and approved pricing structure after the go-live date. The vendor must

provide CMS with seven days advance notice of the proposed price change so that CMS may confirm that the new pricing structure meets the requirements specified above.

9.0 WITHDRAWING A PLAN YEAR 2021 VENDOR APPLICATION

As outlined in the Notice of Conditional Approval, final approval to offer Marketplace training for agents and brokers for plan year 2021 is contingent upon the vendor's compliance with the requirements outlined in 45 C.F.R. § 155.222(b). This includes the vendor's adherence to HHS' specifications for delivery of training, which are outlined throughout this document.

CMS' conditional approval of a vendor's application does not obligate the vendor to offer Marketplace training for agents and brokers for plan year 2021. All conditionally approved vendors should review the guidance provided to ensure that their organizations can successfully meet the program requirements. Any vendor that chooses not to pursue this opportunity should notify CMS of its decision in writing via the Vendor Training Mailbox (AgentBrokerVendor@cms.hhs.gov). Doing so will not preclude or unfairly bias the prospective vendor from participating in the program in future years.

APPENDIX A: AGENT/BROKER TRAINING STYLE GUIDE

This Style Guide is intended to promote consistency in usage and style in all materials produced by and for the Centers for Medicare & Medicaid Services (CMS) Center for Consumer Information & Insurance Oversight (CCIIO).

Acronyms

- Upon first use within a training module, spell out the full term and include the acronym in parentheses WITHOUT quotes surrounding the acronym.
 - **Example:** Small Business Health Options Program (SHOP)
- If the term is used only once in the training module, do not include the acronym with first (and only) use.
- Avoid using acronyms in titles and headings, space permitting.
- Acronyms pronounced as a word do not include “the” beforehand.
 - **Example:** CHIP is one of the programs for the Medicaid expansion.
 - **Exception to the rule:** SHOP is preceded by “the” per CCIIO guidance. The correct reference is “the SHOP.”
- Acronyms that are pronounced using each letter include “the” beforehand.
 - **Example:** The HDR takes required training.
 - **Exception to the rule:** Do not use “the” before HHS, CMS, or CCIIO.
- When an abbreviation/acronym begins with B, C, D, G, J, K, P, Q, T, U, V, W, Y, or Z, the indefinite article “a” is used.
- When an abbreviation/acronym begins with A, E, F, H, I, L, M, N, O, R, S, or X is used, use the indefinite article “an.”
 - **Example:** In the Marketplace, a consumer may qualify for an SEP 60 days following certain life events.
- Do not include U.S. in front of any agency name (e.g., Department of Health & Human Services (HHS)).

Table 1 lists common acronyms used in the Marketplace training curriculum for agents and brokers. For a complete list of HHS acronyms, visit www.hhs.gov/az; for a complete list of CMS acronyms, visit www.cms.gov/apps/acronyms.

Table 1: Common CMS/CCIIO Acronyms

Acronym	Term (listed case sensitive as it would appear within a sentence)
ACA	<u>Do not use the acronym ACA.</u> Always spell out the Affordable Care Act. Do not use health care law, new health care/reform law, or health reform law.
AI/AN	American Indian/Alaska Native Note: Use “consumers who are AI/AN” where possible to avoid plural use.
APTC	advance payments of the premium tax credit Note: Use “premium tax credit” unless referring specifically to advance payments of the credit. Do not use plural “credits.”

Acronym	Term (listed case sensitive as it would appear within a sentence)
AV	actuarial value
CAC	certified application counselor
CCIIO	Center for Consumer Information & Insurance Oversight Note: You must use the ampersand symbol (“&”) instead of the word “and.”
CEU	Continuing education unit
CHIP	Children’s Health Insurance Program
CMS	Centers for Medicare & Medicaid Services Note: You must use the ampersand symbol (“&”) instead of the word “and.” Ensure “Centers” is plural.
CMP	civil money penalty
COBRA	Consolidated Omnibus Budget Reconciliation Act
CO-OP	Consumer Operated and Oriented Plan
CSRs	cost-sharing reductions Note: Ensure cost-sharing is hyphenated. Must include an “s” at the end of this acronym (i.e., “CSRs”).
DOI	Department of Insurance
EHB	essential health benefits Note: <u>Do not</u> use the acronym EHBs; always use EHB.
EIDM	Enterprise Identity Management System
FEHBP	Federal Employees Health Benefits Program
FFM	Federally-facilitated Marketplace Note: Ensure Federally-facilitated is hyphenated.
FPL	federal poverty level Note: When using FPL in a sentence use as “###% of the FPL.”
FTE	full-time equivalent
FTI	federal tax information
HHS	Department of Health & Human Services Note: You must use the ampersand symbol (“&”) instead of the word “and.” Do not put “U.S” in front of this acronym.
HIPAA	Health Insurance Portability and Accountability Act
IRS	Internal Revenue Service
IT	information technology
LMS	learning management system
MAGI	modified adjusted gross income
MEC	minimum essential coverage

Acronym	Term (listed case sensitive as it would appear within a sentence)
MLMS	Marketplace Learning Management System Note: Use “the” in front of “MLMS.” Example: Agents and brokers must execute the applicable Marketplace Agreements on the MLMS.
MLR	medical loss ratio
MPR	minimum participation rate
NPN	National Producer Number Note: Do not use “NPN number,” as that is redundant.
OEP	Open Enrollment period
OMB	Office of Management and Budget
P&S	privacy and security
PHI	protected health information
PII	personally identifiable information
PPACA	Patient Protection and Affordable Care Act Note: PPACA is not synonymous with the Affordable Care Act, and should only be used when specifically calling out the initial PPACA law signed on March 23, 2010.
QHP	qualified health plan Note: plural is QHPs. Try to use QHP instead of “plan” when specifically referring to coverage through the Marketplace.
SADP	stand-alone dental plan
SBM	State-based Marketplace
SBM-FP	State-based Marketplace on the Federal Platform
SCORM	Sharable Content Object Reference Model
SEP	special enrollment period Note: Use “an SEP.” Do not use “a SEP.” Example: Dan got married last month and is now eligible for an SEP so he can add his wife to his QHP.
SHOP	Small Business Health Options Program Note: do not use “the SHOP Marketplace.”
VA	Veterans Health Administration
WBE	web-based entity

Commonly Used Terms and Phrases

Table 2 lists often-used terms or phrases and guidelines in regard to capitalization, punctuation, abbreviation and use.

Table 2: Commonly Used Terms and Phrases

Term or Phrase	Notes (listed case sensitive as it would appear within a sentence)
834 enrollment transaction	Use this term to reference the transaction sent from the QHP issuer to the Marketplace to confirm a consumer's enrollment in a QHP. Do not use "834."
advance payments of the premium tax credit	Usage varies between "advance payments of premium tax credit" and "premium tax credit" based on whether content is about the advance payment of or the premium tax credit itself. Do not use plural "credits."
Agent and Broker Call Center	Not "Agents and Brokers Call Center" or any other form.
Agent and Broker Marketplace Registration Completion List	Use this complete name on first reference and identify the short form in parentheses, like this- "(Registration Completion List)"—immediately after that.
agent/broker agents/brokers	Do not use either of these short forms. Instead, use "agent and broker," agent or broker," "agents and brokers," or "agents or brokers."
agent/broker portal or agent/broker landing page	Use lowercase and forward slash between the words "agent" and "broker"
agents and brokers	Do not capitalize. Do not use "agents/brokers" or "AB" acronym unless you receive prior client approval.
agent's or broker's	Use this for the possessive format. Both words must have the possessive "'s." Example: Both Pathways transmit the agent's or broker's identifying information to the appropriate QHP issuer.
Agents and Brokers Resources webpage	This is the accepted term used to reference this webpage: http://go.cms.gov/CCIIOAB Do not call it a "website." Example: Additional information is available on the CCIIO Agents and Brokers Resources webpage.
Agreement	Always capitalized. Use plural "Agreements" when referring to the Agreements that agents and brokers who participate in the Individual Marketplace must sign. Use singular "Agreement" when referring to the Agreement that agents and brokers who exclusively participate in the SHOP must sign. When directed by CCIIO, use the proper name for each of the Agreements: • General Agreement: (Individual Marketplace only): "Agent Broker General Agreement for Individual Market Federally-facilitated Exchanges and the State-based Exchanges on the Federal Platform" • Privacy and Security Agreement for the Individual Marketplace: "Agreement between Agent or Broker and the Centers for Medicare & Medicaid Services (CMS) for Individual Market Federally-facilitated Exchanges and the State-based Exchanges on the Federal Platform" • Privacy and Security Agreement for the SHOP: "Agreement between Agent or Broker and the Centers for Medicare & Medicaid Services (CMS) for the Small Business Health Options Programs of the Federally-facilitated Exchanges and State-based Exchanges on the Federal Platform" • Web-broker Agreement: "Agreement between Web-broker Entity and the Centers for Medicare & Medicaid Services (CMS) for the Federally-facilitated Exchange Individual Market"
coinsurance	Do not hyphenate.
consumers	Use this term instead of <i>constituents, customers, clients, beneficiaries, callers, people, and individuals</i> . Note: Medicare uses beneficiary.

Term or Phrase	Notes (listed case sensitive as it would appear within a sentence)
	Try to avoid using the singular “consumer” if it requires the use of a pronoun later – avoid using “he/she” or “him/her” if you can make the noun plural instead and use “they” or “them.”
copayment	Do not hyphenate.
cost-sharing	Hyphenate when used as an adjective, but not when used as a noun. For example: - QHPs may not increase <u>cost-sharing</u> requirements at any time. - QHP issuers may limit <u>cost sharing</u> for enrolled individuals. The term “cost-sharing reductions” is always hyphenated.
Department of Insurance	Capitalize when referring to a state’s Department of Insurance.
Direct Enrollment Pathway	Always capitalized.
disenrollment	Do not hyphenate.
enrollees	Use this term only when referring to consumers that already have health coverage through the Marketplace
essential health benefits	Do not capitalize. Always use the singular acronym EHB, never the plural acronym EHBs.
federal	Lowercase, unless used in a proper noun like “Federal Reserve.”
FFM User ID	“User” gets an initial capitalization.
health care	Use “health care” as two words regardless of whether it is noun or adjective. This is consistent with use at HealthCare.gov and the Internal Revenue Service. Exception: Use “healthcare” as a single word when it appears as part of a defined title, like “HealthCare.gov.”
HealthCare.gov	For general references to HealthCare.gov (e.g., as a proper noun), use “HealthCare.gov” with no hyperlink. Ensure the “H” and the “C” are capitalized, and the “g” is lowercase. Example: The agent or broker is securely redirected from the QHP issuer’s or web-broker’s website to HealthCare.gov to complete the eligibility application with the consumer.
HealthCare.gov account	Do not use; it should be “Marketplace account.”
identity proofing	Use “identity proofing” rather than “identity verification.”
Individual Marketplace	Always capitalized. Note: Unless quoting from materials that refer to commercial insurance markets generally, do not use the term “individual market,” to avoid confusion with this Marketplace-specific term.
individual shared responsibility payment	Use “individual shared responsibility payment.” Do not capitalize. Do not use “tax,” “penalty,” or “fee” when referencing the payment.
issuer	Do not capitalize. Proper usage includes: - qualified health plan issuer - QHP issuer - issuer appointment - health insurance issuer Do <u>not</u> use health insurance company or insurance company.
issuer-based pathway	This term does not receive initial caps, like “Direct Enrollment Pathway” or “Marketplace Pathway.”
levels of coverage	Also called “metal levels of coverage” and “health plan categories.” You may refer to the different levels as Gold, Silver, etc., but be careful to provide context for the labels. References to the levels should be capitalized: Platinum, Gold, Silver, Bronze.

Term or Phrase	Notes (listed case sensitive as it would appear within a sentence)
	Catastrophic health insurance plans belong to Marketplace insurance categories, but are not metal levels of coverage. Do <u>not</u> capitalize “catastrophic.”
Marketplace	Always capitalized. Do not use “Exchange” or “Exchange Marketplace” unless citing the title of the Agreement or quoting from a regulation. See also the section below titled “Proper Use of the Term “Marketplace” For the types of Marketplaces, capitalize the first word, but not the hyphenated word, and Marketplace: • Federally-facilitated Marketplace • State-based Marketplace • State Partnership Marketplace • State-based Marketplace on the Federal Platform
Marketplace Pathway	Also referred to as the “Side-by-Side Pathway.”
Medicaid	Refer to Medicaid as an agency, not an office (e.g., the state Medicaid agency).
MyAccount	Do not use; it should be “Marketplace account.”
Navigator(s)	Always capitalized.
Open Enrollment	Capitalize both words Example: During the annual Open Enrollment Period, consumers can enroll in a QHP. Example: To buy Marketplace insurance outside Open Enrollment, you must qualify for an SEP.
plan year	Use “plan year” rather than “coverage year” or “benefit year.” Do not capitalize unless it is part of a title.
premium tax credit	Use “the premium tax credit.” If referring to lowering monthly costs or getting it in advance, then use “advance payments of the premium tax credit.” “Credit” is always singular.
qualified health plan	Do not capitalize. However, capitalize the acronym QHP. Can use acronym QHPs, if referring to more than one plan.
redetermine/ redetermination	Do not hyphenate.
Re-enrollment	Hyphenate; do not use “reenrollment.”
Small Business Health Care Tax Credit	Always capitalized.
small employer	Use “small employer” rather than “small business.”
state	Lowercase, unless when used as the following: • The State of Wisconsin • State-based Marketplace
web-broker	Should be hyphenated and lowercase (web-broker). When used in a title or at the beginning of the sentence, use Web-broker (lowercase “b”).
webpage	Use this term when referring to the Agents and Brokers Resources webpage on the CMS/CCIIO website.
website	One word, lowercase. Do not use web site, Website, or Web site.

Proper Use of the Term “Marketplace”

This section provides some style guidelines for how to refer to the Health Insurance Marketplace program.

1. Upon first use of the term “Marketplace” in any training module, include a service mark (SM) on the word “Marketplace,” and a footnote with the following statement:
*Health Insurance MarketplaceSM and MarketplaceSM are service marks of the United States Department of Health & Human Services. When used in this document, the term “Health Insurance Marketplace” or “Marketplace” refers to Federally-facilitated Marketplaces (FFMs), including FFMs where states perform plan management functions, and also refers to State-based Marketplaces on the Federal Platform (SBM-FPs).
2. Avoid the term “Exchange” in all training modules.
Example: The Affordable Care Act helps create a competitive private health insurance market through the Health Insurance Marketplace. A Marketplace organizes health insurance options to help consumers and small businesses shop for coverage in a way that permits comparison of available plan options based on price, benefits and services, and quality.
3. When directing learners to online information, use the formulation “You can find more information at HealthCare.gov.” Do not say “on HealthCare.gov.” You can often avoid this issue with the phrases “go to,” “visit,” and “see.”
Example: For more information about exemptions from the requirement to have health insurance, visit HealthCare.gov/health-coverage-exemptions.
4. Use the term “coverage” instead of “insurance” when referring to the product obtained through the Marketplace.
Example: Employers can offer health coverage to their full-time employees through the SHOP.
5. The term “Federally-facilitated Marketplace” (FFM) can be used to be inclusive of the Individual Marketplace and the SHOP.
Example: There is still time to register to participate as an agent or broker in the Federally-facilitated Marketplace (FFM) before the annual Open Enrollment Period starts on November 1, 2020.
6. Use “through the Marketplace” rather than “in the Marketplace.”
Example: Agents and brokers who have completed the registration requirements may assist consumers in applying for eligibility and enrolling in QHPs through the Federally-facilitated Marketplace.