WellSense HEALTH PLAN

Broker News

November 13, 2025

ACA Clarity

NPN changes

National Producer Number (NPN) overrides have been phased out with new rules requiring agents to submit applications using their own NPN. The new policy aims to improve visibility, streamline reporting, and enhance compliance with tracking agent activity and maintaining oversight. The agent who solicits, sells, and negotiates the policy must be the one using their own NPN on the enrollment.

Key Changes and Implications

- **Mandatory use of agent own NPN:** All individual agents must now use their own assigned NPN for all individual and family plan enrollments.
- **Supersedes platform guidance:** This carrier policy supersedes any guidance from CMS or other platforms that might have allowed NPN overrides. Refer to New Hampshire Insurance Department bulletin here.
- **Focus on compliance:** The change is intended to enhance compliance by improving reporting and tracking of agent activity and creating a more client line of sight for the agent of record.
- **Consequences for non-compliance:** Failure to comply with these new policies can lead to termination of the agent and/or contract.
- **Agents responsibility:** Agents must be licensed and appointed with every carrier for which they are writing.
- **Impact on agencies:** This change is designed to affect agency employees and downline agents, ensuring that the individual agent working with the client is properly identified on the application.

Agent Best practices

- **2026 enrollments:** Adjust your workflow to use your Individual NPN for all new enrollments.
- **Verify license appointments:** Double check that you're properly appointed with all the carriers you work with.
- **Anticipate further changes:** Stay informed about specific rules from all carriers which can vary. The ACA market is constantly changing, so it's imperative to stay informed about new rules and mandates.

Reminder: ACA consent & eligibility forms

The ACA consent and eligibility review forms are essential for protecting consumer rights and ensuring broker compliance with CMS regulations. Brokers must use these forms to document consent and verify application accuracy before assisting with Marketplace enrollments.

Earlier this summer, CMS released an updated version of the **Model Consent Form and Eligibility Application Form for Marketplace Agents, Brokers, Web-brokers and Agencies.**

To meet CMS requirements, brokers should take the following steps:

- **Use the latest forms:** Download and implement the updated CMS Model Consent Form here.
- **Document everything:** Keep detailed records of consent and eligibility reviews, including timestamps, consumer names, and broker identifiers. CMS requires brokers to retain these records for at least 10 years. Consent and eligibility review conversations should be recorded, where permitted under state law, and producible to CMS upon request.
- **Train your team:** Ensure all staff understand the importance of these forms and how to complete them correctly.
- **Leverage technology:** Use CRM or agency management systems to digitally track and store consent and review documentation for easy retrieval during audits.
- **Stay updated:** Regularly review CMS guidance and attend compliance webinars or training sessions to stay informed about evolving requirements.

By following these practices, you will not only meet regulatory standards but also build trust with your clients. If you have questions or need support implementing the new form, feel free to reach out to AgentAdmin@wellsense.org. You can also find helpful information in the CMS Frequently Asked Questions: Consumer Consent & Application Review Requirements.

Upcoming webinars

Please join us to learn about our 2026 WellSense Clarity (ACA) Individual and Family products. Patrick MacLeod, WellSense broker account executive, will take a deeper dive into the plans, benefits and services, provider network and the impact of legislative changes for 2026. Join us on one of the following dates:

- Tues., Nov. 18, 2-3:00 pm
- Thurs, Nov. 20, 10-11:00 am
- Mon, Nov. 24, 2-3:00 pm

RSVP for a session

Please reach out to AgentAdmin@wellsense.org with any questions.