

September 16, 2020

FFM Training and Registration Rules

CMS Requirements

- Blue Cross and Blue Shield of Montana (BCBSMT) is required by the CMS to verify your plan year 2021 Federally Facilitated Marketplace (FFM) registration before paying you or your agency for a new sale or renewal of a Marketplace (on-exchange) policy. [Visit the CMS's Resources for Agents and Brokers for registration information.](#)
- FFM registration dates must predate helping consumers with Marketplace enrollment.
- We use the [CMS's Agent and Broker FFM Registration Completion List](#) (RCL) to confirm your status. Make sure your FFM registration is recorded via the RCL. You don't need to send us your FFM registration confirmation certificates but keep them for your records.

The Subproducer's Role

- A subproducer must be in our system (onboarded) and have their own BCBSMT-issued nine-digit producer number before helping consumers enroll in Marketplace policies. Contact the [Producer Service Center@hcsc.net](mailto:Producer_Service_Center@hcsc.net) for onboarding steps.
- We can't compensate an agency for a Marketplace sale unless the subproducer uses their own personal National Producer Number during the FFM Registration process.
- Subproducers, not agencies, must be included on Marketplace policies.

Annual FFM Compensation Rules

- **New and Active Renewals***: The FFM registration date on the RCL must be dated earlier than a client's application submission date for a new sale or an active renewal of a Marketplace policy to be eligible for compensation. Registering early with the FFM is vital. A client could actively renew in a Marketplace policy on Nov. 1, 2020. The Producer of Record must be registered with the FFM by then to be eligible for compensation.
- **Passive Renewals†**: The FFM registration date on the RCL must be dated earlier than your client's effective date for a passive renewal in a Marketplace policy to be eligible for compensation. In other words, the FFM registration date must be no later than Dec. 31 for passive renewals with a Jan. 1 effective date.

* *Active Renewal: An existing member does not want their current renewing plan and decides to choose a new/different BCBSMT plan during open enrollment.*

† *Passive Renewal: An existing member keeps their current renewing plan, which requires no action by the member. Passive renewals are automatic.*