



**September 2, 2025**

Center for Consumer Information and Insurance Oversight (CCIIO)  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

**Re: Concerns Regarding New 30-Minute API Inactivity Revalidation Requirement for FFM/EDE Access**

Dear CCIIO Leadership,

On behalf of the National Association of Benefits and Insurance Professionals (NABIP) and our more than 100,000 licensed health insurance agents, brokers, and benefits specialists, we write to express deep concern regarding CMS's recent decision to impose a 30-minute inactivity timeout on Federally-facilitated Marketplace (FFM) account connections through Enhanced Direct Enrollment (EDE) platforms.

**Operational Impacts on Consumers and Agents**

Since this policy was implemented on August 29, agents and brokers across the country have reported immediate and significant disruptions:

- Applications are timing out mid-enrollment, forcing brokers to restart from the beginning and, in some cases, causing **lost enrollments**.
- Brokers are required to **re-enter CMS Enterprise Portal credentials multiple times per day**, creating excessive friction. This challenge will be most disruptive during peak Open Enrollment traffic.
- Brokers report that clients with longer consultations cannot complete an application within the 30-minute window, which will be especially problematic during Open Enrollment when consumers often need additional explanations and plan comparisons.
- HealthSherpa and other EDE partners report that agents are being incorrectly marked as inactive by CMS, despite actively working within their platforms. This is because many API calls, such as those for quoting and system interactions related to agency management, are not counted as activity. Only actions like fetching consumer accounts or applications are logged, triggering unnecessary reconnection prompts.

This added friction point diminishes broker productivity and, more importantly, threatens consumer access to timely enrollment. In the words of one of our members: *“Every extra friction point = lowering productivity = slowing down enrollments. Essentially this is how we kill ACA without passing any laws.”*

## Misapplication of Security Standards

We recognize and support the importance of strong cybersecurity safeguards. However, it is critical to distinguish between established federal standards and CMS’s current implementation choice:

- **NIST is not the culprit.** The National Institute of Standards and Technology (NIST) publishes NIST-800 security standards, which EDE partners have followed from the outset and are regularly audited to prove compliance.
- **EDE already complies.** EDE interfaces already enforce inactivity timeouts consistent with NIST standards.
- **Where CMS is overstepping.** By extending the inactivity requirement to API connections, CMS has created a policy that goes beyond NIST’s requirements. This interpretation does not materially improve security but instead disrupts workflows and increases consumer frustration.

## Constructive Solutions

Our members are committed to protecting consumer data and supporting Marketplace integrity. We respectfully urge CMS/CCIIO to reconsider and adjust this policy in ways that balance security with practical enrollment needs:

1. **Extend the inactivity window** from 30 minutes to at least 60 minutes to reflect the real-world length of consumer consultations and application completion.
2. **Reevaluate application to API calls** so that “inactivity” is measured based on user-facing activity, not back-end transactions.
3. **Work with EDE partners on server-side batching or revalidation processes** that can preserve secure connections without repeatedly interrupting brokers mid-application.



4. **Engage directly with the broker community** before implementing major workflow changes, to ensure that new requirements support both security and consumer access.

## Conclusion

NABIP members facilitate nearly 80% of ACA Marketplace enrollments. When CMS creates unnecessary barriers for brokers, the practical effect is reduced consumer access to affordable coverage. We strongly urge CCIIO to pause, reconsider, and revise this policy before the upcoming Open Enrollment Period, when millions of Americans will rely on brokers for guidance.

We appreciate your attention to this urgent matter and stand ready to work collaboratively to ensure both secure and accessible enrollment pathways.

Sincerely,  
Michael Andel  
Senior Vice President of Government Affairs  
National Association of Benefits and Insurance Professionals (NABIP)