



September 4, 2025

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

Re: 30-Minute Inactivity Timeout on Enhanced Direct Enrollment Platform Connections

The National Association of Insurance & Financial Advisors (NAIFA) submits these comments to express our concerns with the recent decision by CMS to impose a 30-minute inactivity timeout on federally facilitated marketplace account connections through Enhanced Direct Enrollment (EDE) platforms. This policy change could unintentionally harm consumer access to health insurance coverage and impede the ability of licensed insurance professionals to effectively serve their clients.

About NAIFA

Founded in 1890, NAIFA is the oldest and largest association representing insurance and financial advisors in the United States. Our members are licensed professionals who help millions of Americans access health insurance through the Affordable Care Act marketplaces, including through Enhanced Direct Enrollment platforms. NAIFA members subscribe to a strict Code of Ethics and are committed to promoting financial security and well-being for all Americans through professional guidance and personalized services.

Concerns with 30-Minutes Inactivity Timeout on EDE Platforms

EDE platforms provide comprehensive consumer experiences that include eligibility applications, Exchange enrollment, and year-round customer service capabilities, all integrated directly with CMS APIs. They serve as the primary interface between consumers and the marketplace for the majority of enrollments. According to CMS's own data, 57% of all active enrollments in the federally facilitated marketplace during the 2023 open enrollment period were conducted through EDE and classic Direct Enrollment entities, with EDE and DE pathways accounting for 81% of broker-assisted plan selections. This demonstrates the vital role these platforms play in connecting consumers with coverage.

NAIFA strongly supports efforts to implement effective cyber security safeguards in the Exchange marketplace; however, the recent changes have created several unintended barriers impacting consumers and the agents that serve them. It is important to remember:

- **Complex applications require more time:** Gathering documentation (tax returns, pay stubs, immigration documents) and completing family applications often takes longer than 30 minutes.

NATIONAL ASSOCIATION OF INSURANCE AND FINANCIAL ADVISORS

1000 Wilson Boulevard, Suite 1890, Arlington, Virginia 22209 | 703-770-8100 | www.naifa.org



- **Consultation needs:** Licensed agents provide essential plan comparison, subsidy calculations, and education that cannot and should not be rushed.
- **Vulnerable populations could suffer most:** Low-income families, non-English speakers, elderly consumers, and individuals with disabilities may require additional time and support, making them particularly vulnerable to interruptions during the application process.

As a result, the timeout policy may lead to higher rates of incomplete or abandoned applications; rushed decisions leading to inappropriate plan selections; increased administrative burden on EDE platforms and agents; and forced re-authentication that creates inefficiencies and consumer confusion. While NAIFA recognizes CMS's security concerns following recent unauthorized enrollment issues, the 30-minute timeout is overly broad and will create obstacles to engagement between agents and consumers. We urge CMS to:

- **Extend the inactivity window** to at least one hour to better reflect the complexity of the application process.
- **Implement flexible timeout structures** based on activity type.
- **Focus security measures** on protecting consumer data without creating broad enrollment barriers.
- **Engage industry stakeholders** in developing solutions that maintain both security and accessibility.

Conclusion

The 30-minute timeout undermines ACA goals of expanding coverage access and will likely increase the uninsured population. Licensed professionals and EDE platforms have been instrumental in achieving record enrollment levels. This policy threatens that success by creating unnecessary barriers to marketplace participation. We urge CMS to work collaboratively with stakeholders to develop targeted security solutions that protect program integrity while preserving the accessible enrollment pathways that consumers depend on.

Sincerely,

Doug Massey
President
NAIFA