Oklahoma's Health Insurance Marketplace
Certified Application Counselor (CAC) Program Guidelines

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Table of Contents

Part 1: Overview

1.1 Oklahoma's Health Insurance Marketplace

The Oklahoma Insurance Department (OID) is a state agency responsible for enforcing Oklahoma's insurance laws, protecting consumers, and overseeing a competitive insurance marketplace. House Bill 1512, signed into law on May 15, 2025, provided OID with the authority to establish and operate a Health Insurance Marketplace. Oklahoma transitioned from the Federally-facilitated Exchange (FFE) to a State-based Exchange on the Federal Platform (SBE-FP) on May 1, 2026 for the remainder of plan year (PY) 2026 and for all of PY 2027.

Oklahoma's SBE-FP has multiple enrollment options including HealthCare.gov or directly through insurance companies, agents, or web brokers certified to operate in the federal Marketplace. As an SBE-FP, consumers continue to use one of these enrollment options to enroll in, renew, and manage their health coverage.

1.2 Oklahoma's Health Insurance Marketplace CAC Program

The Certified Application Counselor (CAC) Program was created under the Affordable Care Act (ACA) to support community organizations in reaching underserved and uninsured populations. In accordance with 45 Code of Federal Regulations (C.F.R.) § 155.210, CACs help consumers understand their coverage options and assist them in finding and applying for health insurance coverage. The ACA requires SBE-FPs to operate a CAC Program.

Organizations that participate in the CAC Program are designated as Certified Application Counselor Designated Organizations (CDOs). To be considered for selection as a PY 2027 SBE-FP CDO on Oklahoma's Marketplace, interested organizations must submit a CAC Program Application Form.

Applications for the CAC Program are accepted throughout the year on a rolling basis. In order to begin assisting consumers by October 1, 2026, ahead of PY 2027 Open Enrollment, please submit the CAC Application Form by September 4, 2026. Organizations may still submit applications after this date throughout the plan year; OID will process applications within 3-4 weeks of submission.

Part 2: CAC Program

2.1 CDO Purpose

CDOs' primary responsibilities include planning, directing, and executing the proposed project and overseeing CAC activities, as described in the CAC Program Intent Form. CDOs must:

- Comply with all applicable federal and state laws.
- Ensure Exchange requirements for CDOs and CACs are upheld.

- Support consumers as outlined in the CDO Agreement.
- Provide required reports to the State on a regular basis.
- Comply with all requests from the State for additional information.

2.2 CDO Responsibilities

CDOs must be capable of carrying out all duties required by the ACA, federal regulations (45 C.F.R. § 155.255), and Oklahoma Administrative Code 365:10-31. These duties include, but are not limited to, the following requirements.

Registration and Certification

- Register as a CDO Entity with OID and ensure that at least one individual CAC has completed the required certification and registration process before assisting consumers. See *Section 3.2 CDO Registration* and *Section 3.3.2 CAC Registration* for more details.

Consumer Assistance

- Maintain expertise on eligibility, enrollment, and program rules and educate the public to increase awareness of the Marketplace.
- Provide information and services fairly, accurately, and impartially to help consumers apply, understand coverage options including Qualified Health Plans (QHPs), and make informed choices while acknowledging other health programs.
- Guide consumers through the eligibility and enrollment process for QHPs including eligibility appeals, Marketplace exemptions, premium tax credit reconciliation basics and IRS resources, basic coverage rights and how to use coverage, and referrals to licensed tax professionals for tax advice.
- Refer consumers with complaints or questions about plans, coverage, or plan determinations to the HealthCare.gov Marketplace Call Center.
- Provide information in culturally and linguistically appropriate ways and ensure tools and services are accessible and usable for people with disabilities.
- Provide targeted assistance to underserved or vulnerable populations identified by the Marketplace within the service area.

Consumer Consent & Personally Identifiable Information (PII)

- Inform applicants about CAC functions and limits, obtain and retain authorization before accessing personal information, and allow applicants to revoke authorization at any time.
- Maintain records of consumer authorization, in either hard copy or electronic format, for no less than six years, unless a different or longer retention period is applicable based on law or regulations. CDOs may use the existing FFE Consumer Consent form or develop their own form, provided it includes all required fields. Access to these records should be limited to CDO personnel who need them to perform their duties. The State reserves the right to terminate a CDO Agreement if the associated CDO fails to protect consumer data.

Program Requirements

- Execute and maintain compliance with the CDO Agreement.
- Monitor CAC compliance with conflict-of-interest requirements.
- Have at least one representative attend recurring meetings with OID.
- Host or participate in outreach events to reach consumers.
  - Hosting an outreach event means the organization plans and leads the event end-to-end, including logistics, promotion, staffing, and delivery.
  - Participating in an outreach event means another organization is the primary host/organizer, and the CDO has a documented, attendee-facing role (e.g., presenting, tabling, or sharing information) to provide outreach/assistance.
- Complete and submit all required reports to the State; see *Section 3.1 CDO Reporting* for more details.
- Demonstrate continued effort towards reaching stated project goals.

CDOs must support uninsured consumers and demonstrate a history of assisting underserved or vulnerable populations. Vulnerable populations are individuals who may face higher risks to their health and wellbeing due to the lack of physical, psychological, and/or social resources. Vulnerable populations may include but are not limited to:

- Racial and ethnic minorities.
- Rural communities.
- Low income or homeless individuals.
- American Indians and Alaska Natives (AI/AN).
- People with physical or intellectual disabilities or cognitive, hearing, speech, and/or vision impairments.
- Pregnant women, new mothers, and women with children.
- Individuals with mental health or substance-related disorders.
- Individuals with HIV/AIDS.
- Medicaid-eligible consumers who are not enrolled in coverage despite being eligible for Medicaid.

Organizations may identify other vulnerable or underserved populations in their CDO Application Form.

2.3 Prohibited CDO Activities

CDOs must comply with the prohibited conflicts of interest standards as defined under 45 C.F.R. § 155.255. Oklahoma's SBE-FP CDOs are not permitted to:

- Receive any consideration directly or indirectly from any health insurance company or issuer of stop loss insurance in connection with the enrollment of any individuals or employees in a QHP or a non-QHP.
- Charge any applicant or enrollee in coverage available on HealthCare.gov for application or other assistance related to CAC duties.
- Provide applicants or potential enrollee gifts of any value as an incentive for enrollment.

- Initiate any telephone call to a consumer using an automatic telephone dialing system or an artificial or prerecorded voice, except in cases where the CDO has a relationship with the consumer and so long as other applicable State and Federal laws are otherwise complied with.
- Compensate individual CACs on a per-application, per-individual-assisted, or per-enrollment basis.

2.4 Non-Discrimination Guidelines

CDOs must administer their programs in compliance with federal civil rights laws that prohibit discrimination based on race, color, national origin, disability, age, and, in some circumstances, religion, conscience, and sex. This includes ensuring programs are accessible to persons with limited English proficiency. CDOs must comply with all applicable federal and state statutes relating to non-discrimination, including, but not limited to:

- Oklahoma Anti-Discrimination Act (OADA).
- Title VI of the Civil Rights Act of 1964.
- Section 504 of the Rehabilitation Act of 1973.
- The Age Discrimination Act of 1975.
- Title II, Subtitle A of the Americans with Disabilities Act of 1990.
- Section 1557 of the Affordable Care Act.
- Title IX of the Education Amendments of 1972.
- Applicable federal religious and conscience protection and associated anti-discrimination laws.

2.5 Individual CAC Requirements and Prohibitions

CACs are expected to perform the following activities:

- Provide unbiased, fair consumer assistance and conduct outreach to target populations and consumers applying for Marketplace coverage.
- Educate consumers on basic healthcare concepts, available QHPs, coverage options, their eligibility results, and financial assistance available on HealthCare.gov.
- Provide consumers with accessibility support, including language interpretation.
- Direct consumers to other resources, including to the HealthCare.gov Marketplace Call Center or agents/brokers, for additional support as necessary.

CACs are prohibited from performing the following activities:

- Recommending, selling, soliciting or negotiating specific insurance plans for consumers.
- Completing a consumer's Marketplace enrollment on their behalf or providing specific plan selection advice.
- Providing gifts or incentives to consumers.

- Imposing fees for providing consumer support and assistance.
- Requesting or receiving compensation from insurance companies, agents, third parties, or consumers.
- Liaising between employers and health insurance companies.
- Initiating contact with consumers to offer assistance via automated dialing system.

CACs are required to support any consumer seeking Marketplace application assistance, regardless of population. When a CAC does not have the capacity or the knowledge to help an individual, the CAC must connect the individual with assistance in a timely manner. CACs' potential resources and other type(s) of assistance include the following:

- HealthCare.gov Marketplace Call Center for questions about the application and enrollment.
- HealthCare.gov or the HealthCare.gov Marketplace Call Center to enroll in coverage.
- Agents with whom CACs have no established relationship or association for assistance selecting an appropriate plan.
- Medicare, including Oklahoma's Medicare Assistance Program (MAP).
- SoonerCare for Oklahoma Medicaid and Oklahoma's Children's Health Insurance Program (CHIP).

Part 3: Post-Acceptance Responsibilities

CDOs accepted into the CAC Program will receive a CDO Agreement for signature accompanied by an Acceptance Letter summarizing the responsibilities below.

3.1 CDO Reporting

CDOs must cooperate with the State's efforts to track the program. CDOs are required to provide regular reports to the State as well as additional information and reports as requested. Reports may include, but are not limited to, the following:

- Performance metrics of affiliated CACs and the types of consumer assistance provided.
- Number of consumers who have received Marketplace assistance.
- A current list of affiliated CACs.

CDOs are required to submit quarterly reports throughout the performance period on the deadlines outlined below:

Reporting Period #	Reporting Period Timeframe	Report Submission Deadline
1	July 1 – September 30, 2026	October 15, 2026
2	October 1 – December 31, 2026	January 15, 2027
3	January 1 – March 31, 2027	April 15, 2027
4	April 1 – June 30, 2027	July 15, 2027
5*	July 1– August 31, 2027	September 15, 2027

**The fifth reporting period is only two months to align with the end of the PY 2027 performance period on August 31, 2027.*

CDOs should submit their first report based on when they are accepted into the program. For example, if the CDO Agreement is executed on October 1, the CDO is responsible for submitting its first report on January 15th. Additional reporting guidance, including a reporting template, will be provided to participating CDOs.

3.2 CDO Registration

SBE-FP CDOs must complete annual registration with OID before overseeing CACs or conducting outreach. **CDOs must be registered before OID will countersign the CDO Agreement.** The registration steps are outlined below.

1. Complete the *Navigator Entity and Certified Application Counselor Designated Organization (CDO) Application.*
2. Attach list of affiliated individual CACs.
3. Pay the $50.00 annual registration fee by check or money order.
4. Include additional supporting documents, if needed (e.g., work authorization for non-US citizens, supporting documents for attestation).
5. Mail application fee and completed registration packet to the OID Licensing Division (400 NE 50th Street, Oklahoma City, OK 73105).

CDOs must maintain an accurate list of all CACs currently operating in their organization and alert OID of any changes within 30 days.

Refer to the OID website for details on registration requirements.

3.3 Individual CAC Certification and Registration

All individuals performing CAC functions must be affiliated with an Oklahoma SBE-FP CDO, complete the required certification training, and register with OID.

3.3.1 CAC Certification

CACs must submit proof that they completed the required federal certification training before assisting consumers for PY 2027. CMS releases new training each plan year ahead of Open Enrollment. All CACs must complete and pass CMS's PY 2027 training assessment and submit proof of certification to SBEAssister@oid.ok.gov. Within 60 days of execution of the CDO Agreement, the CDO must have at least one certified and registered CAC submit proof of certification. CACs must select "SBE-FP" as their assister type when taking CMS's training. More information regarding federal certification is available on the CMS website.

CACs are also required to review the *Assister Certification Training Information for PY 2027* document available on the OID Assister Resources website.

3.3.2 CAC Registration

CACs must be affiliated with a selected SBE-FP CDO that has active OID registration and they must complete the required annual OID registration steps outlined below. Each CDO must have at least one affiliated individual CAC complete registration within 60 days of execution of the CDO Agreement and before assisting consumers. Detailed requirements are available on the OID website.

1. Read through the *Pre-registration Education Materials for Navigators*.
2. Complete the *Individual Navigator and Certified Application Counselor ("CAC") Registration.*
3. Pay the $25.00 application fee by check or money order.
4. Submit to a criminal background check with Oklahoma State Bureau of Investigation ($15) dated no more than 30 days prior to the date of application.
5. Provide valid work authorization (for applicants who are not citizens of the United States).
6. Provide all supporting documents, if answered "yes" to any of the background questions in the application including:
    a. Written statement; and
    b. Certified copies of all relevant documents.
7. Mail application fee and completed registration packet to the OID Licensing Division (400 NE 50th Street, Oklahoma City, OK 73105).

CACs can contact the Licensing Division at licensing@oid.ok.gov for support with the registration process.

Part 4: Required Documents

4.1 Submission Instructions

CDOs must submit the following materials to be considered for participation in Oklahoma's Exchange. Do not include any consumer PII in this document.

- CAC Application Form
- Signed CDO Agreement

Please submit all questions to SBEAssister@oid.ok.gov and once complete email CAC Application Form to SBEAssister@oid.ok.gov. **If accepted into the program, CDO Agreements will be sent via Adobe Acrobat Sign.**

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The State reserves the right to contact CDOs for additional information.