

# Medicare Enrollment Periods

When can a  
broker sell  
MAPD or  
PDP plans?



# Agenda

- Common Election Periods
  - New to Medicare
    - ICEP – Initial Coverage Election Period (MA/MAPD)
    - IEP – Initial Enrollment Period (MAPD/PDP)
  - AEP – Annual Enrollment Period
  - OEP – Open Enrollment Period
  - OEPI – Open Enrollment Period Institutionalized
- Special Election Periods
  - Loss of Coverage
  - Change in Residence
  - Low Income Eligible - New to LIS/Extra Help vs. No changes to LIS Extra Help
  - Other SEPs
  - General Enrollment Period - SEP
- Common Mistake
- Questions



# New to Medicare - Entitlement to Medicare Part A, B & D

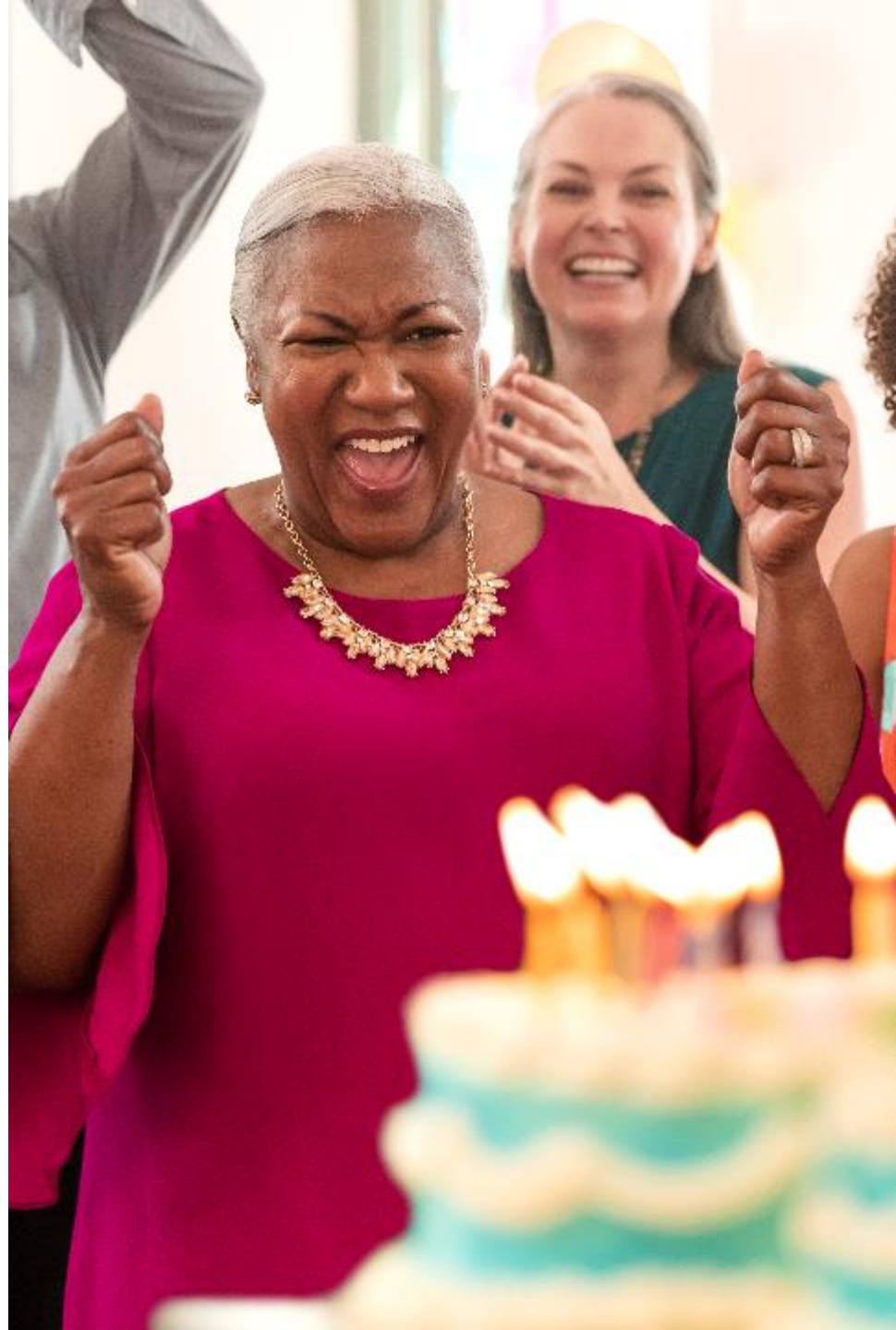
To be eligible to elect an MA or MAPD plan, an individual must be entitled to Medicare Part A and enrolled in Part B, and must be entitled to Medicare Part A and Part B benefits as of the effective date of coverage under the plan.

To be eligible for Part D and to enroll in a PDP, an individual must be entitled to Medicare Part A or enrolled in Part B as of the effective date of coverage under the PDP.

Most individuals are eligible to enroll in Parts A & B surrounding their 65<sup>th</sup> birthday. Their entitlement is generally the 1<sup>st</sup> of the month they aged 65.

The one exception to this is when the individual's birthday falls on the 1<sup>st</sup> of the month, they are entitled the 1<sup>st</sup> of the prior month. Example: Date of birth is April 1<sup>st</sup>; they would be entitled to Medicare on March 1<sup>st</sup>.

There are other times individuals obtain Medicare Entitlement due to disability, ESRD and other exceptions. They must still follow the rules above to enroll in MA/PDP plans.



# Initial Coverage Enrollment Period (ICEP)

The ICEP is the period during which an individual newly eligible for MA may make an initial enrollment request to enroll in an MA plan. This period begins three months immediately before the individual's first entitlement to both Medicare Part A and Part B and ends on the later of one of two scenarios



Note: Once an ICEP/IEP enrollment request is made and enrollment takes effect, the ICEP election has been used

## Scenario 1

If the member enrolls in both A& B at the same time, they get the 3 months prior, month of and 3 months after to enroll.

Part A & B both Effective 4/1/2020

Enrollment period is:

| 3 months before |        |        | Month of | 3 months after |        |        |
|-----------------|--------|--------|----------|----------------|--------|--------|
| Jan-20          | Feb-20 | Mar-20 | Apr-20   | May-20         | Jun-20 | Jul-20 |

## Scenario 2

If the member's Part B is effective later than Part A, they get 3 months prior to the Part B effective date to enroll.

Example:

Part A Effective 1/1/2019

Part B Effective 4/1/2020

Enrollment period is

| 3 months before |        |        |
|-----------------|--------|--------|
| Jan-20          | Feb-20 | Mar-20 |

# Initial Enrollment Period (IEP)

Individuals who are becoming eligible for Medicare will have an Initial Enrollment Period for Part D that is the 7 month period surrounding Medicare eligibility. IEP is the 7-month period that begins 3 months before the month an individual meets the eligibility requirements for Part B and ends 3 months after the month of eligibility.

Individuals eligible for Medicare prior to age 65 (such as for disability) will have another Initial Enrollment Period for Part D based upon attaining age 65.

When a member enrolls as “new” to Medicare, the plan determines whether to use IEP or ICEP.

- PDP only – always uses IEP
- MAPD – uses IEP when A/B are the same date as it has a Part D attached.
- MAPD – uses ICEP only when A/B are different dates.
- MA only - uses ICEP as there is no Part D attached.

## Reasons for Initial Enrollment Period Eligibility

- |                          |  |
|--------------------------|--|
| <input type="checkbox"/> | I am new to Medicare.                            |
| <input type="checkbox"/> | I previously had Medicare but am now turning 65. |



# Annual Enrollment Period (AEP)

## Reason for Annual Enrollment Period Eligibility

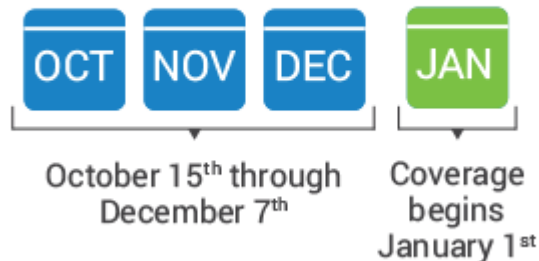
- I am enrolling between 10/15/YY-12/7/YY during the current Annual Enrollment Period.

Beginning in 2011, the AEP is from October 15 through December 7 of every year. It is also referred to as the “Fall Open Enrollment” season and the “Open Enrollment Period for Medicare Advantage AND Medicare prescription drug coverage” in Medicare beneficiary publications and other tools.

There is one AEP enrollment/disenrollment choice available for use during this period. An enrollment/disenrollment election cannot be changed after the end of the AEP.

A member can submit as many applications they wish during this time. The last application received is the one that goes into effect.

## When Is the Open Enrollment Period?



# Open Enrollment (OEP)

During the MA OEP, MA plan enrollees may enroll in another MA plan or disenroll from their MA plan and return to Original Medicare.

Individuals may make only one election during the MA OEP.

This chart outlines who can use the MA OEP and when:

| Who can use MA OEP:   | MA OEP occurs:   |
|---|--|
| Individuals enrolled in MA plans as of January 1                            | January 1 – March 31   |
| New Medicare beneficiaries who are enrolled in an MA plan during their ICEP | The month of entitlement to Part A and Part B – the last day of the 3rd month of entitlement |

- I am enrolled in a Medicare Advantage plan and want to make a change during the Medicare Advantage Open Enrollment Period (MA OEP).

## So what can the member do during OEP?

- Individuals enrolled in either MAPD or MA-only plans can switch to:
  - MA-PD
  - MA-only
  - Original Medicare (with or without a stand-alone Part D plan)

The effective date for an MA OEP election is the first of the month following receipt of the enrollment request.

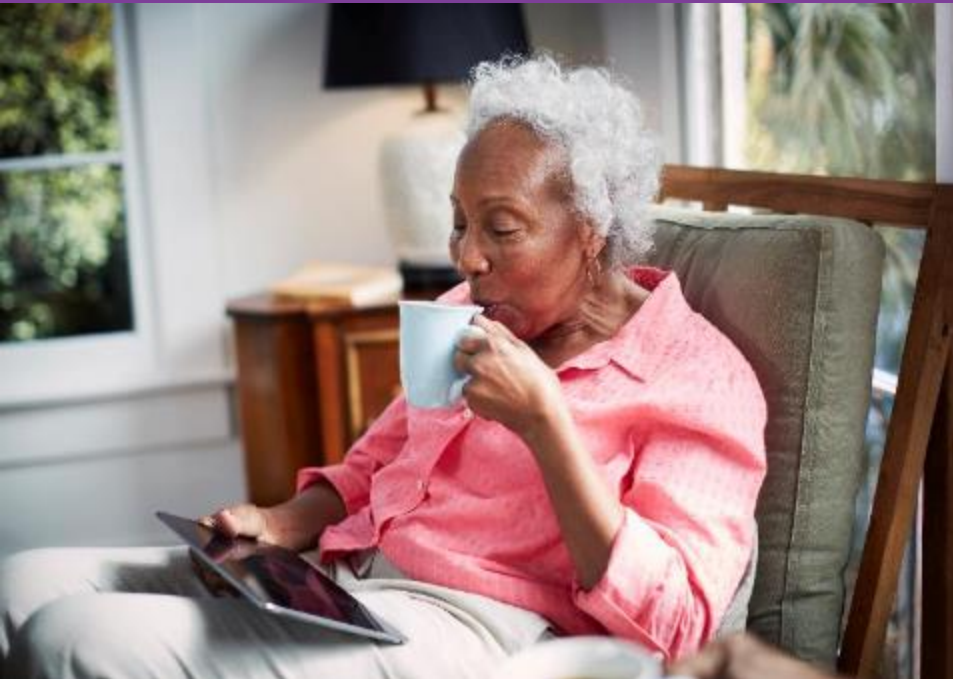
Remember, newly eligible members have an OEP when they first enroll. Does not have to be Jan-Mar.

**NOTE:** The MA OEP does not provide an opportunity for an individual enrolled in Original Medicare to join a MA plan. It also does not allow for Part D changes for individuals enrolled in Original Medicare, including those enrolled in stand-alone Part D plans. The MA OEP is not available for those enrolled in Medicare Savings Accounts or other Medicare health plan types (such as cost plans or PACE).

## So what can the plan or Broker NOT do during OEP?

- Send unsolicited materials advertising the ability/opportunity to make an additional enrollment change or referencing the OEP;
- Specifically target beneficiaries who are in the OEP because they made a choice during Annual Enrollment Period (AEP) by purchase of mailing lists or other means of identification;
- Engage in or promote agent/broker activities that intend to target the OEP as an opportunity to make further sales; or
- Call or otherwise contact former enrollees who have selected a new plan during the AEP. For more information on the OEP,

# Open Enrollment - Institutional (OEPI)



The OEPI is continuous for eligible individuals. For purposes of enrollment/disenrollment under the OEPI election period, an institutionalized individual is defined as an individual who moves into, resides in, or moves out of an institution.

The OEPI ends two months after the month the individual moves out of the institution

**Institutionalized Individual** - An individual who resides in an institution:

- Skilled nursing facility (SNF)
- Nursing facility (NF)
- Intermediate care facility for the mentally retarded
- Psychiatric hospital
- Rehabilitation facility
- Long-term care facility

I am moving into, live in, or recently moved out of, a long-term care facility (for example, a nursing home). I moved/will move into/out of the facility on \_\_\_/\_\_\_/\_\_\_ (date).



# Special Election Periods

The length of a Special Enrollment Period (SEP) and the effective date of new coverage vary depending on the circumstances that trigger the SEP.

The plan and, in some cases, the Centers for Medicare & Medicaid Services (CMS), determine whether an applicant qualifies for an SEP.

The rules for changing Medicare drug plans are the same whether you are in a stand-alone drug plan that only covers drugs or a Medicare Advantage Plan that covers both health care and drugs.

# Special Election Periods

## Loss of Coverage

I am leaving Employer Group Coverage (including COBRA)

I will leave or left my employer or union coverage on \_\_/\_\_/\_\_ (date).

My current plan is non-renewing or has a service area reduction

My plan is ending its contract with Medicare or Medicare is ending its contract with my plan.

I am involuntarily losing creditable prescription coverage.

I recently involuntarily lost my creditable prescription drug coverage (coverage as good as Medicare's). I lost my drug coverage on \_\_/\_\_/\_\_ (date).

**Note:** The only voluntary loss of coverage is leaving employer group health plan, all other losses must be involuntary. The only exception for involuntary loss of coverage that cannot be used, is involuntary loss for failure to pay premiums.

# Special Election Periods

## Loss of Coverage

|   |  |  |
|---|--|--|
| <p><b>SEP – EGHP</b></p> <p>You can enroll in an MAPD or PDP.</p> <p>You get two months after your coverage ends to enroll.</p> <p>Effective date can be chosen up to 3 months from the date of receipt of the application.</p> | <p><b>SEP – Non Renewal</b></p> <p>You can enroll in an MAPD or PDP</p> <p>You get from Dec 8<sup>th</sup>- End of February to enroll.</p> <p>Effective date is the first of month after application date.</p> | <p><b>SEP – Involuntary Loss</b></p> <p>You can enroll in an MAPD or PDP</p> <p>You get two months after your coverage ends to enroll.</p> <p>Effective date is the first of month after application date.</p> |
| <p><input type="checkbox"/> I will leave or left my employer or union coverage on __/__/__ (date).</p>  | <p><input type="checkbox"/> My plan is ending its contract with Medicare or Medicare is ending its contract with my plan.</p>  | <p><input type="checkbox"/> I recently involuntarily lost my creditable prescription drug coverage (coverage as good as Medicare's). I lost my drug coverage on __/__/__ (date).</p>                           |

**Note:** The only voluntary loss of coverage is leaving employer group health plan, all other losses must be involuntary. The only exception for involuntary loss of coverage that cannot be used, is involuntary loss for failure to pay premiums.

# Special Election Periods

## Change in Residence

**An SEP for change in residence or “move” exists for the following:**

1) Individuals no longer eligible due to a move outside of their service area.

I recently moved outside of the service area for my current plan or I recently moved and this plan is a new option for me. I moved on \_\_\_/\_\_\_/\_\_\_ (date).

2) Individuals with new plans available to them due to a permanent move.

I recently was released from incarceration. I was released on \_\_\_/\_\_\_/\_\_\_ (date).

3) Individuals who were incarcerated, but are now released

This SEP allows for enrollment elections only. It begins on either the date the member permanently moves or the date they notify the plan.

The SEP lasts for 2 months following the move or the date the member notified the plan of the move, whichever is later.

The individual may choose the effective date of up to 3 months after the plan receives the enrollment request. However, it can not be prior to the actual move date.

### **Notes about Out of Area:**

When the member notifies the plan of their permanent move that places them out of the service area, the plan is required to disenroll the member the first of the following month after notification. The member needs to be advised of this to avoid any gaps in coverage so they can enroll in their new service.

When CMS or another source advises the plan of a possible move out of area, the plan will make attempts to confirm the move. If the member fails to reply within 6 months for an MAPD or 12 months for a PDP, they will be disenrolled.

# Special Election Periods For Dual Eligible or LIS

I recently had a change in my Medicaid (newly got Medicaid, had a change in level of Medicaid assistance, or lost Medicaid) on \_\_\_/\_\_\_/\_\_\_ (date).

Change to  
LIS or  
Extra Help

I recently had a change in my Extra Help paying for Medicare prescription drug coverage (newly got Extra Help, had a change in the level of Extra Help, or lost Extra Help) on \_\_\_/\_\_\_/\_\_\_ (date).

New to  
LIS or  
Extra Help

Loss of  
LIS or  
Extra Help

All have an SEP to make one election to enroll or disenroll from an MAPD or PDP plan. The election is valid for 3 months from the date of the event or notice of the event. The effective date is the first of the month following the application date.

# Special Election Periods For Dual Eligible or LIS

For continuing dual eligible members, they have an SEP to make a change once per quarter except the 4<sup>th</sup> quarter of each year. They are expected to use AEP during the 4<sup>th</sup> quarter.

It's considered used based on the application date not the effective date. For example, an application received on 3/12 for a 4/1 effective date is "used" during the 1<sup>st</sup> quarter not the 2<sup>nd</sup> quarter.

It's considered used for that quarter no matter which month they use it in.

The effective date is always the first of the month following the application date.

This SEP is separate from the prior slide and use of the New/Loss/Change does not apply to this SEP.



- I have both Medicare and Medicaid (or my state helps pay for my Medicare premiums) or I get Extra Help paying for my Medicare prescription drug coverage, but I haven't had a change.

# Special Election Periods

## SNP

An SEP exists to enroll in another plan when a member loses their SNP eligibility. For example, no longer has Medicaid and is enrolled in a DSNP.

This SEP begins when the member is deemed not eligible and lasts for three months after the period of expiration of the period of deemed continued eligibility or when the member makes an election.

I was enrolled in a Special Needs Plan (SNP), but I have lost the special needs qualification required to be in that plan. I was disenrolled from the SNP on \_\_\_/\_\_\_/\_\_\_ (date).

## SPAP

Members who belong to a State Pharmaceutical Assistance Programs (SPAP) have an SEP to enroll, or make one change if already enrolled, into an MAPD or PDP plan. This SEP can only be used once per year.

Loss of SPAP also allows an SEP to enroll or disenroll from an MAPD or PDP for up to 2 months after they lose SPAP.

I belong to a pharmacy assistance program provided by my state.

## PACE

Members who disenroll from a PACE plan can enroll in an MA plan for up to two months after they leave.

In addition, members may disenroll at any time to enroll in a PACE plan.

I recently left a PACE program on \_\_\_/\_\_\_/\_\_\_ (date).

# Special Election Periods

## FEMA

A SEP exists for individuals affected by a weather-related emergency or major disaster who were unable to and did not make an election during another valid election period. This includes both enrollment and disenrollment elections.

Individuals will be considered “affected” and eligible for this SEP if they:

- Reside, or resided at the start of the incident period, in an area for which FEMA has declared an emergency or a major disaster and has designated affected counties as being eligible to apply for individual or public level assistance;
- Had another valid election period at the time of incident period; and
- Did not make an election during that other valid election period.

In addition, the SEP is available to those individuals who don't live in the affected areas but rely on help making healthcare decisions from friends or family members who live in the affected areas. The SEP is available from the start of the incident period and for four full calendar months thereafter.

<https://www.fema.gov/disasters>

- I was affected by a weather-related emergency or major disaster (as declared by the Federal Emergency Management Agency (FEMA)). One of the other statements here applied to me, but I was unable to make my enrollment because of the natural disaster.



**Note: CMS has approved this SEP for COVID-19 from 3/1/2020-6/30/2020. The individual must meet all requirements to be affected.**





# Special Election Periods for Disenrollment

## SEP65

- Members who enroll in an MAPD using their ICEP when they aged 65, have an SEP to disenroll and return to original Medicare any time during the first 12 months of enrollment.
- This SEP can also be used to enroll in a PDP only plan to go along with original Medicare.

## SEP – Trial Period

- An SEP exists for members who dropped a Medigap plan to enroll in an MAPD for the first time and who are still in the “trial period” (first 12 months). This allows them to re-enroll in a Medigap plan using their “guaranteed issue” and disenroll from the MAPD plan.
- They can also use this SEP to enroll in a PDP only plan to go along with the Medigap plan.

# Special Election Periods

There are many other Special Election Periods that fit special circumstances.

- SEP for Individuals Enrolled in Cost Plans that are Non-renewing their Contracts
- SEP for Individuals Who Disenroll in Connection with a CMS Sanction
- SEP for Individuals with ESRD Whose Entitlement Determination Made Retroactively
- SEP for Individuals Whose Medicare Entitlement Determination Made Retroactively
- SEP for Enrollment Into a Chronic Care SNP and for Individuals Found Ineligible for a Chronic Care SNP
- SEP for Non-U.S. Citizens who become Lawfully Present
- SEP for Providing Individuals who Requested Materials in Accessible Formats Equal Time to Make Enrollment Decisions
- SEP for CMS and State-Initiated Enrollments
- SEP to enroll in a 5-Star plan

For further understanding, the [MAPD](#) and [PDP](#) Guidance are your best resource.

# General Enrollment Period (GEP)

Beneficiaries who do not enroll into Medicare during their initial enrollment period can enroll in Medicare during the annual General Enrollment Period from Jan 1-Mar 31. Their Medicare Part A and/or B will be effective on July 1<sup>st</sup> of that same year.

They can then choose to enroll in a Part C or D plan between Apr 1 – Jun 30 to also be effective July 1<sup>st</sup>.



## What is the criteria to enroll in an MA or PDP plan due to GEP?

- ✓ Have premium-free Part A effective anytime prior or up to July 1<sup>st</sup>.
- ✓ Have Part B effective July 1<sup>st</sup>.
- ✓ Submit an enrollment for one of the following:
  - an MA or MAPD plan using ICEP between April 1<sup>st</sup> and June 30<sup>th</sup>, or
  - enroll in a PDP plan using the GEP between April 1<sup>st</sup> and June 30<sup>th</sup>.

The effective date of the plan will be July 1<sup>st</sup> for both scenarios.

# Common Mistake

## ICEP vs. Loss of EGHP

Brokers often mistake the rule about ICEP when Part B is obtained later than Part A.

The election period is only valid for the 3 months PRIOR to their Part B effective date. The member has to submit the enrollment before that date.

So often brokers think the member still has the full 7 months to enroll, however, they don't when Part B is deferred during their Part B eligibility period and obtained at a later date than Part A.

However, 99% of the time, a member gets Part B at a later date because they remained employed and had EGHP.

The election period for enrollments after the Part B entitlement date can often be processed using "Loss of EGHP" as the election period.

If the app denies for invalid election period, the broker can submit the attestation form to correct the election period if the member did just lose their coverage from their employer within the last two months.



# Sources & Tools

Understanding Medicare Part C & D

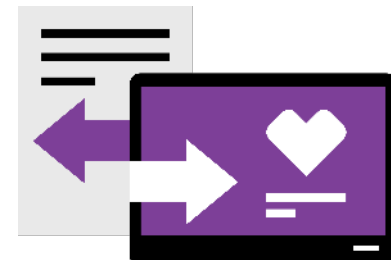
<https://www.medicare.gov/Pubs/pdf/11219-understanding-medicare-part-c-d.pdf>

Medicare Managed Care Manual

[https://www.cms.gov/Medicare/Eligibility-and-Enrollment/MedicareMangCareEligEnrol/Downloads/CY\\_2019\\_MA\\_Enrollment\\_and\\_Disenrollment\\_Guidance.pdf](https://www.cms.gov/Medicare/Eligibility-and-Enrollment/MedicareMangCareEligEnrol/Downloads/CY_2019_MA_Enrollment_and_Disenrollment_Guidance.pdf)

Medicare Prescription Drug Manual

[https://www.cms.gov/Medicare/Eligibility-and-Enrollment/MedicarePresDrugEligEnrol/Downloads/CY\\_2019\\_PDP\\_Enrollment\\_and\\_Disenrollment\\_Guidance.pdf](https://www.cms.gov/Medicare/Eligibility-and-Enrollment/MedicarePresDrugEligEnrol/Downloads/CY_2019_PDP_Enrollment_and_Disenrollment_Guidance.pdf)



# Questions?

