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Medicare Enrollment Period Changes
and Medicare Advantage Updates

Gail Sexton; Ray Swisher; and Deme Umo, CMS



New Changes to Enrollment Rules

Enrollment for Medicare Parts C & D

*Center for Medicare/Medicare Enrollment & Appeals Group, and
Medicare Medicaid Coordination Office
Deme Umo, CM/MEAG
Gail Sexton CM/MEAG
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New Enrollment Changes

- Regulation CMS-4182-F, published 4/16/18
 - Impacts MA, Part D and Cost plans
 - Effective 1/1/2019
 - Subregulatory guidance issued 7/31/2018

Regulation Changes

- Duals/LIS Special Enrollment Period (SEP) Changes
 - Limitation for at-risk beneficiaries
- MA Open Enrollment Period
- Seamless Conversion/Default Enrollment
- Passive Enrollment

Duals/LIS SEP Limitations

- Currently, SEP for duals/LIS-eligible is ongoing
- Starting 1/1/2019, this particular SEP can only be used once per calendar quarter during the first three quarters of the year (January – September)
 - AEP can be used in the 4th quarter

Duals/LIS SEP Limitations (continued)

- Comprehensive Addiction and Recovery Act (CARA) established drug management programs
- Individuals who have been notified that that they are “potentially at risk” or “at-risk” under a drug management program cannot use the dual/LIS SEP
 - Limitation lasts until the “at-risk” determination expires or is terminated by the plan
- Other election periods are still available – AEP, other SEPs

New Part D SEPs

- SEPs established for the following groups:
 - Those who have been assigned into a plan by CMS/State (e.g., auto-assignment, reassignment, passive enrollment)
 - Those who gain, lose, or have a change in their dual/LIS status
- These two SEPs are separate from the dual/LIS SEP

SEPs Finalized in CMS-4182-F

	1. Dual SEP -- §423.38(c)(4)	2. Change in LIS -- §423.38(c)(9)	2. Change after CMS/State initiated enrollment -- §423.38(c)(10)
Detail	For full/partials duals to use onetime per calendar quarter during the first nine months of the year to enroll in a new plan or disenroll from the current plan	For full/partial duals who gain, lose, or have a change in Medicaid/level of LIS to enroll in a new plan or disenroll from the current plan	For beneficiaries (primarily full/partial duals) being enrolled in a plan by CMS or a State (i.e., auto enrollment, facilitated enrollment, passive enrollment, or reassignment).
CARA: Available for Potential at-risk or at-risk beneficiaries?	No – Eligibility for dual SEP is voided if a beneficiary is identified as potentially at-risk or at-risk by their current plan, but they can still use other available election periods (e.g., AEP, OEP, etc.)	Yes	Yes
Frequency	One allowable election for each of the following time periods: January –March, April – June, and July – September.	Onetime use separate from other SEP opportunities. If bene has multiple Medicaid/LIS status changes in a calendar year, the SEP could be used multiple times	Onetime use separate from other SEP opportunities. If bene is assigned more than once in a calendar year, could be used multiple times.
SEP starts	1/1, 4/1, 7/1	Upon notification of change in LIS or dual eligibility	Upon notification of assignment to another plan.
SEP ends	At end of 3 month period or Upon use (application date)	Three months after change of LIS or dual-eligibility or, of being notified of the change, whichever is later	Three months after notification of assignment or assignment effective date, whichever is later. (Is not considered “used” if bene opts out of assignment and reverts to their original plan (i.e., cancellation).)
Effective date	First day of the month following election (prospective only)	First day of the month following election (prospective only)	First day of the month following election (prospective only)

MA Open Enrollment Period

- MA Disenrollment Period ended 2018
- MA Open Enrollment Period starting in 2019
- January 1 – March 31 each year
- Must be in MA plan on 1/1 to use MA OEP
- New Medicare beneficiaries who enroll in MA during IEP have 3 months to use MA OEP to make a change

MA Open Enrollment Period (continued)

- People in an MA Plan on January 1 can:
 - Switch MA plans
 - Can add or drop Part D coverage
 - Leave MA to join Original Medicare
 - coordinating Part D SEP if go to FFS
- Part D not guaranteed
- Can't use MA OEP if enrolled in Original Medicare, or PDP, Cost, PACE or MSA plans

Seamless Conversion/Default Enrollment

- Default enrollment only permitted from Medicaid Managed Care plans into D-SNP under same organization when beneficiary is first eligible for Medicare
 - Plan must request and get CMS approval before implementing default enrollment
 - State determines if MA plan can do default
 - Advance notification with 60-day opt-out
 - Coverage in MA plan starts the same day as A/B

Simplified (opt in) Enrollment Mechanism

- Optional process for MA organizations that offer both MA plans and non-Medicare coverage (in place of default enrollment)
- Generally permits plans to collect only the information they don't already have for the MA enrollment
- Plans may offer simplified enrollment via paper, telephone or electronically
- Available only to those in their ICEP (newly eligible for Medicare- must have both A & B)
- No break between non-Medicare plan and MA plan
- Can use MA OEP to change after enrollment starts

Passive Enrollment

- Expanding to dually eligible beneficiaries currently enrolled in a non-renewing integrated D-SNP into another integrated D-SNP
- To be conducted in consultation with a state Medicaid agency

Passive Enrollment (continued)

- Receiving plan requirements include:
 - High level of integration
 - Quality standards
 - Premium and cost sharing limits
 - Similar benefits and provider network
- Beneficiaries will receive:
 - 60 day and 30 day notice of passive enrollment
 - Passive enrollment SEP in addition to other SEPs

Election Periods to Enroll

Election Period	Occurs From	Coverage Starts	Notes
Annual Election Period	October 15 – December 7	January 1	Plan marketing begins on Oct. 1
Non-Renewal SEP	December 8 – end of February	First of the month after request is made	If no election made by 12/31, individual will be in Original Medicare and lose Part D
Medicare Advantage Open Enrollment Period	January 1 – March 31, or 3 months after initial entitlement	First of the month after request is made	Must have MA. Can switch to any MA plan (except MSA), or go to Original Medicare. If go to Original Medicare, have SEP to enroll in Part D plan. Can add or drop Part D when switching plans.

Election Periods to Enroll (cont.)

Election Period	Occurs From	Coverage Starts	Notes
5-Star SEP	For enrollments effective during the year in which that plan has the 5-star rating	First of the month after request is made	Only enroll into a 5-Star Plan. Part D coverage not guaranteed.
SEP for Dual Eligible Individuals	Ongoing - One use per calendar quarter during the first nine months of the year	First of the month after request is made	Cannot be used by “at-risk” or “potentially at-risk” beneficiaries.
Other SEPs	Varies based on situation, like residence changes, Special Needs status, etc.	Varies	

Enrollment Period Hierarchy

MA

1. ICEP/IEP-D
2. MA OEP
3. SEP
4. AEP
5. OEPI

Part D

1. IEP for Part D
2. MA OEP
3. SEP
4. AEP

References

Medicare Managed Care Eligibility and Enrollment

<https://www.cms.gov/Medicare/Eligibility-and-Enrollment/MedicareMangCareEligEnrol/index.html>

Chapter 2 - [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)

Chapter 17-D - [https://www.cms.gov/Medicare/Eligibility-and-Enrollment/MedicareMangCareEligEnrol/Downloads/CY 2019 Cost Plan Enrollment and Disenrollment Guidance.pdf](https://www.cms.gov/Medicare/Eligibility-and-Enrollment/MedicareMangCareEligEnrol/Downloads/CY_2019_Cost_Plan_Enrollment_and_Disenrollment_Guidance.pdf)

Medicare Prescription Drug Eligibility and Enrollment -

<https://www.cms.gov/Medicare/Eligibility-and-Enrollment/MedicarePresDrugEligEnrol/index.html>

Chapter 3 - [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)



Medicare Advantage 2019

Selected topics for discussion

*Center for Medicare and Medicaid Services
Chicago Regional Office
Raymond Swisher
ARA, Division of Medicare Health Plans Operations
August 2018*

Supplemental Benefits

- Adult Day Care
- Home-based Palliative Care
- In-home Support Services
- Support for Caregivers
- Medically-approved Non-Opioid Pain Management
- Stand-alone Memory Fitness Benefit

Supplemental Benefits

- Home and Bathroom Safety Devices
- Transportation
- Over the Counter (OTC) Benefits

Meaningful Differences

And some other changes coming in 2019

MA Trends

- Enrollment
- Premiums
- Out of pocket expenditures
- Geographic Differences

SHIP COLLABORATION

Workgroup evaluating the MA Contract
Termination Process