



Information on PAP, ACC and MCD Special Enrollment Periods

There has been some confusion around the appropriate use of the PAP, ACC and MCD Special Enrollment Periods (SEP). CMS and our carriers have been monitoring the use of these SEPs and letting us know when they've been used inappropriately. This compliance bulletin is designed to provide you with more information on the proper use of these SEPs to ensure business is processed expeditiously.

What is PAP SEP?

A Pharmaceutical Assistance Program (PAP) SEP is a Special Enrollment Period for an individual who belongs to a qualified "State Pharmaceutical Assistance Program" (SPAP) or when the state, acting as their authorized representative, can request to enroll in a PDP or MAPD plan once per calendar year.

Who is Eligible for PAP SEP?

An individual is only eligible for the PAP SEP for a limited time after losing eligibility for SPAP benefits. The PAP SEP begins when the individual is enrolled in the SPAP and, upon loss of eligibility for SPAP benefits, for an additional two calendar months after either the month of the loss of eligibility or notification of the loss, whichever is later.

What is ACC SEP?

An ACC SEP refers to a Medicare Advantage Special Enrollment Period that is provided to an individual when they request information about their plan in an accessible format. The ACC SEP is not a “stand-alone” election. The beneficiary must have been eligible for another election period prior to using this SEP. This limited SEP ensures that beneficiaries who have requested information in an accessible format are not disadvantaged by any additional time necessary to fulfill their request, including missing an election period deadline.

What is accessible format?

Accessible format refers to presenting healthcare information in a way that can be understood by individuals with disabilities, including options like large print, Braille, audio recordings, or digital text that can be read by screen readers, allowing them to access and comprehend important medical details without barriers.

Who is Eligible for ACC SEP?

The ACC SEP is available to any Medicare beneficiary who was not provided decision-making material in an accessible format at the same time as standard material is provided. **Note: This is not a “stand-alone” election. The beneficiary must have been eligible for another election prior to using this SEP.** This SEP begins at the end of the election period in which the request for accessible formatted material was made. The length of the SEP will be at least as long as the time it took for the material to be provided.

What is MCD SEP?

This SEP applies to individuals who gain, lose, or have a change in their Medicaid (Dual Eligible) status.

Who is Eligible for MCD SEP?

The MCD SEP applies to individuals who:

- Become eligible for any type of assistance from the Title XIX program (including “partial duals” who receive cost sharing assistance under Medicaid);
- Lose eligibility for any type of assistance; or
- Have a change in the level of assistance they receive (e.g., stop receiving Medicaid benefits, but still qualify for Low Income Subsidy (LIS) those who have a change in cost sharing).

This SEP allows the individual one opportunity to make an election within three months of any of the changes noted above, or notification of such a change, whichever is later. The effective date for enrollments under this SEP is the first day of the month following receipt of the enrollment request.

Reminder: Agents are responsible for ensuring they are using the correct SEPs per CMS requirements. Misuse of SEPs could result in corrective action from carriers and/or CMS.

