

Reminder About Information on PAP Special Enrollment Period

There has been some confusion around the appropriate use of the PAP Special Enrollment Period (SEP). The purpose of this bulletin is to provide more information and clarification regarding when a PAP Special Enrollment Period can be used.

What is PAP SEP?

The 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 an individual who is enrolled in the SPAP loses eligibility for the SPAP. The PAP SEP will extend for two calendar months after the month of loss of eligibility or notification of the loss, whichever is later.

To use the PAP SEP, the individual MUST be a member of the state's Pharmaceutical Assistance Program. The PAP SEP election does not apply to an individual just because he/she resides in a state with a PAP.

Can I Enroll a Client Into a State PAP?

No, as a general rule, States will not allow an agent to enroll a client into the State's PAP on their behalf.

When Can I Use the PAP SEP?

You must wait until the client is officially enrolled in the PAP to use the PAP SEP. This can take some time as the state's approval isn't always immediate. Applying for the PAP does not trigger the SEP window, the actual enrollment does.

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.