



Guidance for PDP/MA/MAPDs to Correct MA-OEP Election Type Code Rejections

This memo provides guidance to address recently identified issues within the MARx system for plans using the MA-OEP election type.

We note that, if a **valid** MA OEP election is requested by a beneficiary, the plan should not try to resolve a system issue by submitting false or incorrect data. Further, the plan should still provide health and/or prescription drug coverage until these elections are processed in MARx (i.e. indicate that the beneficiary is covered).

Please follow these steps to correct enrollment related error messages:

Rejections

CMS has implemented a fix to allow PDP enrollments to use the MA-OEP (“M” election type code). Even though the fix was intended primarily for PDPs, this guidance includes information which is also relevant to MA plans and MAPDs.

If your MA-OEP submission rejected prior to the fix on January 27, please follow the steps outlined below.

TRC 104 - “Rejected; Invalid or Missing Election Type”

If the plan receives a TRC 104, please verify the following:

1. The organization type is correct. Only MA, PDP and MAPD plans are able to submit enrollments using the MA-OEP. PDP plans are also able to submit enrollments using the MA-OEP as long as the beneficiary is enrolled in an MA and MAPD plan. Please review the MA-OEP policy in the [Fall 2018 Detail Release Memo](#) to determine if your organization type is one that is allowed to use the MA-OEP election type code.

Plan action: If you are a plan type that can submit an MA-OEP election, proceed to step 2.

2. The beneficiary was enrolled in a MA/MAPD plan as of January 1, 2019. The beneficiary must also be enrolled in a MA/MAPD plan when the MA-OEP request is made.

Example 104-1: Beneficiary is enrolled in an MA plan on January 1, 2019. The beneficiary requests disenrollment from the MA plan on January 4, 2019, effective February 1, 2019. On January 5, 2019, the beneficiary then requests enrollment into a PDP or a MAPD using the MA-OEP effective February 1, 2019. The enrollment transaction will reject with a TRC 104 because the previous enrollment action triggered an enrollment end date in MARx, and, therefore, the beneficiary’s current enrollment is not determined to be an active enrollment in MARx.



Plan action: Resubmit the rejected PDP or MAPD enrollment request using the “S” (Special Election Period).

3. The effective date of an election is the same date as the effective date of a prior valid election, and each enrollment request is using a different election type code.
Example 104-2: On January 7, 2019, an enrollment was submitted for Plan A (MA plan) effective February 1, 2019 using ‘U’, which was accepted. On January 14, 2019, an enrollment was submitted for a different MA plan, Plan B effective February 1, 2019 using ‘M’, which rejected. It was rejected because MARx is seeing the beneficiary as already enrolled in Plan A effective February 1, 2019.

Plan Action: Submit the enrollment with the original effective date using the “S” election type code.

4. The effective date of the MA-OEP enrollment is prior to February 1, 2019. All MA-OEP enrollments must be effective 2/1, 3/1 or 4/1. Any elections with an effective date other than these dates are an incorrect use of the election period.
5. The beneficiary has an existing enrollment for the same effective date, and each enrollment request is using the same MA-OEP election type code. The enrollment verification can be done by using either the MARx eligibility screen (M232) or by performing a Batch Eligibility Query (BEQ).

Example 104-3: An enrollment transaction is submitted for Plan A, a PDP Plan, using the MA-OEP (“M”) for a February 1, 2019 effective date and an application date of January 14, 2019. The transaction is accepted but not yet effective.

The beneficiary changes their mind and submits an application to enroll in Plan B, a PDP Plan. Plan B submits the enrollment using MA-OEP (“M”) for a February 1, 2019 effective date and an application date of January 20, 2019. The Plan B enrollment transaction will reject with the TRC 104 because the enrollment for Plan A was submitted first.

NOTE: In most instances, the enrollment with the latest application date will trump the previously submitted pending enrollment. However, the MA-OEP (“M” election type code) is not allowing the second pending enrollment to be accepted. This scenario also applies if two “MA only” or two “MAPD” enrollments or both an “MA only” and a “PDP” enrollment are submitted prior to the effective date and using the same effective date.

Plan action: Submit the enrollment to the Retro Processing Contractor (RPC). CMS will be providing guidance to the RPC on how to process these enrollment requests.

If your scenario matches numbers 1- 5 above, follow the suggested plan actions, respectively. If none of the scenarios in 1-5 above apply to your original MA-OEP rejection, please resubmit the original request exactly as you did prior to the fix. If your resubmitted enrollment request rejects, please report the rejection to the MAPD Help Desk.



TRC 108 “Rejected; Election Limits Exceeded”

If the plan receives a TRC 108, please verify the following:

1. Enrollment transactions are submitted for both a MA and a PDP (using the “M”) with the same effective date at the same time.

Example 1-108: The beneficiary is currently enrolled in Plan A (MA only) for January 1, 2019 effective date using the election type code (“S”). The beneficiary decides to enroll into another MA only Plan B as well as a PDP Plan C for February 1, 2019. Plan B submits the enrollment request on January 15, 2019 using the MA-OEP. The Plan C submits the enrollment request on January 18, 2019 using the MA-OEP. The Plan C enrollment request will reject with a TRC 108 because the MA-OEP election is used more than once in the same calendar year.

2. Within the same calendar year, a disenrollment transaction and an enrollment transaction are submitted using the MA-OEP.

Example 2-108: The beneficiary is enrolled in a MA Plan (Plan A). The beneficiary requests a disenrollment from Plan A using the MA-OEP election type code. Beneficiary elects to enroll in a MAPD using the MA-OEP election type code. The enrollment transaction submitted by MAPD will reject for the multiple use of the MA-OEP in the same calendar year.

Plan Action: If either one of the examples (1-108 or 2-108) applies to your original rejection, please resubmit the rejected enrollment request using the “S”. The scenarios for TRC 108 will also apply to MA and MAPDs.

Enrollment submitted using the incorrect election type code

If the plan received an MA-OEP rejection and resubmitted the enrollment using an election type other than the MA-OEP (i.e. election type code “L”), the plan should cancel the enrollment that was previously submitted, and resubmit the enrollment using the MA-OEP election type code (“M”). Unless directed by CMS, plans should not use another election type in place of the MA-OEP as a work-around. In addition, if a beneficiary is eligible for more than one election period, plans use the hierarchy below to determine the election period, and then apply the effective date available under that election period.

Ranking of election periods: (1 = Highest, 5 = Lowest)

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

CMS will provide future notification of any additional system changes/improvements for the 2020 MA-OEP.