



MEDICARE ENROLLMENT & APPEALS GROUP

DATE: June 9, 2022

TO: All Medicare Advantage Organizations (MAOs), Prescription Drug Plans (PDPs), Cost Plans, Special Needs Plans (SNPs) and Medicare-Medicaid Plans (MMPs)

FROM: Jerry Mulcahy
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SUBJECT: **Update Announcement of June 26, 2022 Software Release** – Disenrollment for Individuals Who Are Incarcerated and Not Lawfully Present in the United States¹

On November 2, 2021 CMS issued two HPMS memos detailing CMS policy as well as required systems changes regarding enrollment and disenrollment for individuals who are incarcerated or not lawfully present in the United States. That memo also announced that CMS would do a subsequent software release related to these changes in June 2022. On June 26, 2022 CMS plans to disenroll incarcerated or not lawfully present individuals in accordance with eligibility requirements codified in 42 CFR §§ 417.422, 422.50, and 423.30. This memo details information about the upcoming June 26th software release and addresses some questions received after the release of the November 2, 2021 memos titled:

- **Announcement of June 26, 2022 Software Release - Disenrollment for Individuals Who Are Incarcerated in the United States**
- **Announcement of June 26, 2022 Software Release - Disenrollment for Individuals Who Are Not Lawfully Present in the United States**

This memo is organized in three main sections:

1. [System Changes for Incarcerated and Not Lawfully Present Individuals](#)

¹ The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, unless specifically incorporated into a contract. This document is intended only to provide clarity to the public regarding existing requirements under the law, as well as information and instructions regarding Department procedures.

2. [Updated MARx User Interface \(UI\) screens- Incarceration \(Attachment A\)](#)
3. [Updated MARx User Interface \(UI\) screens- Not Lawfully Present \(Attachment B\)](#)

For system related questions please contact the MAPD Help desk at 1-800-927-8069 or email mapdhelp@cms.hhs.gov. Please direct enrollment policy questions to <https://enrollment.lmi.org>. MMP related inquiries should be directed to MMCOEnrollment@cms.hhs.gov with a copy to your Contract Management Team.

Systems Changes for Incarcerated and Not Lawfully Present Individuals

Plans are encouraged to reference the following Health Plan Management System (HPMS) Memoranda issued on November 2, 2021 for important information and a detailed summary of applicable policy, beneficiary notifications, system updates, and MARx disenrollment actions due to periods of not lawful present status and incarcerated individuals:

- **Announcement of June 26, 2022 Software Release - Disenrollment for Individuals Who Are Incarcerated in the United States**
- **Announcement of June 26, 2022 Software Release - Disenrollment for Individuals Who Are Not Lawfully Present in the United States**

Plans are reminded that individuals who are incarcerated or not lawfully present are ineligible for enrollment into a Part D Plan and, therefore, according to 42 CFR 423.46, are not subject to the late enrollment penalty based on the months in which they were ineligible to be enrolled. However, once an individual regains Part D eligibility, the individual would be subject to the late enrollment penalty if they do not enroll in a Part D Plan or obtain other creditable coverage within 63 days.

I. CMS Initiated Involuntary Disenrollment and Re-Enrollment Transactions for Incarcerated Individuals:

One-time automatic involuntary disenrollments and re-enrollments happening on June 26, 2022:

MARx will act to automatically involuntarily disenroll incarcerated individuals with a Medicare Plan ineligibility period that overlaps the individual's enrollment in a Plan. For the years 2019 through 2022, the disenrollments will be effectuated for enrollment periods that overlap either an "open" (i.e. – start date with no end date) or "closed" (i.e. – start date and end date) incarceration period. CMS will consider taking disenrollment action for periods prior to 2019 at a future date. If CMS decides to take additional action, more information will be provided in a future HPMS memorandum. The MARx UI will still display periods of incarceration that are prior to 2019; however, no disenrollment or payment transactions will occur for these periods. CMS will notify Plans of this action through the Special Transaction Reply Report (STRR) using the new Transaction Reply Code (TRC) 346 (Disenrollment due to Confirmed Incarceration). The effective date of these disenrollments will be the first of the month after the incarceration start date. These disenrollments will receive a Disenrollment Reason Code (DRC) of 70 (Confirmed Incarceration). CMS will begin populating the MARx automatic disenrollment for incarceration with an 'S'

election type code and a Special Election Period (SEP) reason code of 00 “[SYS GENERATED ENRLMT/DSENRLMT](#)”.

Additionally, as part of the **one-time** process outlined in the aforementioned November 2, 2021 HPMS memoranda, MARx will automatically attempt to re-enroll the beneficiary back into the Plan the first of the month after the beneficiary’s incarceration has ended. Re-enrollments will not be processed for any incarceration periods that close after June 30, 2022. Example 1, a beneficiary is enrolled in a Plan effective 1/1/2020 with no end date. CMS receives notification of a retroactive period of incarceration beginning 3/1/2020 and ending 1/31/2022. MARx will disenroll the beneficiary effective 4/1/2020. MARx will attempt to re-enroll the beneficiary back into the Plan effective 2/1/2022. Example 2, a beneficiary is enrolled in a Plan effective 1/1/2020 through 8/31/2021. CMS receives notification of a retroactive period of incarceration beginning 3/1/2020 and ending 7/31/2021. MARx will disenroll the beneficiary effective 4/1/2020. MARx will attempt to re-enroll the beneficiary back into the Plan effective 8/1/2021. The new TRC 347 (Reenrollment due to Closed Incarceration Period) will be provided on the STRR for the re-enrollment. MARx automatic re-enrollments for incarceration completed during this one-time process will be populated with an ‘S’ election type code and an SEP reason code of 00 “[SYS GENERATED ENRLMT/DSENRLMT](#)”. The TRCs for this one-time process will be sent to the plans on a STRR on June 28, 2022. Plans should look at their STRR or the MARx UI in order to see the disenrollment effective date. The one-time process will include the Cleanup ID of MEPS90 on the STRR, the Monthly Membership Report (MMR) and the Late Enrollment Penalty Data File (LEPD).

Automatic involuntary disenrollments after June 26, 2022:

MARx will act to automatically involuntarily disenroll incarcerated individuals with a Medicare Plan ineligibility period that overlaps the individual’s enrollment in a Plan. The disenrollments will be effectuated for enrollment periods that overlap either an “open” (i.e. – start date with no end date) or “closed” (i.e. – start date and end date) incarceration periods. CMS will notify Plans of this action through the Daily Transaction Reply Report (DTRR) using the new Transaction Reply Code (TRC) 346 (Disenrollment due to Confirmed Incarceration). The effective date of these disenrollments will be the first of the month after the incarceration start date. These disenrollments will receive a Disenrollment Reason Code (DRC) of 70 (Confirmed Incarceration). CMS will begin populating the MARx automatic disenrollment for incarceration with an ‘S’ election type code and a Special Election Period (SEP) reason code of 00 “[SYS GENERATED ENRLMT/DSENRLMT](#)”.

For incarceration periods received by CMS after the June 26, 2022 implementation, MARx **will not** be re-enrolling the beneficiary back into the Plan they were in after the beneficiary’s incarceration has ended.

II. Plan Submitted Transactions for Incarcerated Individuals:

A. Plan Enrollment Transactions

For new enrollments, Plans need to first check MARx to see if the beneficiary is no longer incarcerated. If the beneficiary has an open-ended period of incarceration, the Plan should instruct the beneficiary to contact 1-800-MEDICARE. The 1-800-MEDICARE Team will work

with the Social Security Administration (SSA) to have SSA's system updated to reflect the beneficiary is no longer incarcerated. The incarceration data will then be sent from SSA to the MARx system monthly. Once MARx is updated to reflect a closed period of incarceration, and the previously incarcerated individual regains eligibility for enrollment in a Medicare Plan, the individual may request enrollment in a Medicare Advantage (MA) or Part D Plan using the existing SEP for Change in Residence (42 CFR §§ 422.62(b)(16), 423.38(c)(21)). The change of residence is associated with MARx election type code 'V'.

Plan submitted enrollments for a beneficiary with an effective date that falls within a Medicare Plan ineligibility period will be rejected with a new TRC 345 (Enrollment Rejected – Confirmed Incarceration). If the enrollment submission begins prior to a Medicare Plan ineligibility period and overlaps the incarceration period, the accepted enrollment will also include a disenrollment date to the end of the day prior to the start of the Medicare Plan ineligibility period. When the enrollment is entered and MARx automatically adds an enrollment end date in addition to the disenrollment transaction reply code (TRC 018 Automatic Disenrollment), the Plan will receive the new informational TRC 346 (Disenrollment due to Confirmed Incarceration). These disenrollments will receive a Disenrollment Reason Code (DRC) of 70 (Confirmed Incarceration).

B. Plan Disenrollment Transactions

If a Plan learns from a source other than CMS that a beneficiary may be incarcerated, the Plan must investigate to determine whether the individual is currently incarcerated and therefore does not reside in the geographic service area of the Plan, and, if confirmed, involuntarily disenroll the member (42 CFR §§ 417.460(f)(1)(i)(A), 422.74(d)(4)(v)(A) and 423.44(d)(5)(iii)). If the Plan confirms an individual's current incarceration status but does not obtain the start date of the current incarceration, the Plan must disenroll the individual prospectively for the first of the month following the date on which the current incarceration was confirmed. If the Plan confirms an individual's current incarceration status as well as the start date of the current incarceration, the Plan must disenroll the individual for the first of the month following the start date of the incarceration. If that disenrollment effective date is outside the range of effective dates allowed by MARx (based on the current calendar month), the Plan must submit the retroactive disenrollment request to the CMS Retroactive Processing Contractor. For involuntary disenrollment based on incarcerated status, Plans should enter Disenrollment Reason Code 07 (For Cause) on the MARx M212- Enrollment Update Screen, followed by disenrollment election type code 'V' (Permanent Change in Residence Address) on the MARx M230- Additional Update Enrollment Information Screen.

III. CMS Initiated Involuntary Disenrollment Transactions for Not Lawfully Present Individuals:

Effective June 26, 2022 MARx will automatically involuntarily disenroll not lawfully present individuals with a Medicare Plan ineligibility period that overlaps the individual's enrollment in a Plan. There are beneficiaries that currently have an open Not Lawfully Present period in the CMS

database. When this change is implemented on June 26, 2022, CMS will take a **one-time** action to identify all the beneficiaries that have an open Not Lawfully Present period that overlaps a current enrollment. MARx will then process a disenrollment transaction for individuals from June 26, 2022 onwards based on the Plan Notification Date for non-future periods only. Individuals disenrolled on June 26, 2022 will have an effective date of July 1, 2022, the month after the Plan Notification Date. If the Not Lawfully Present period is for a future timeframe, MARx will disenroll the beneficiary effective the start date of the Medicare Plan Ineligibility Period. For example, a beneficiary with a Medicare Plan Ineligibility Period Start date of 8/1/2023 will have an 8/1/2023 disenrollment effective date. The TRCs for this one-time process will be sent to the plans on a STRR on June 28, 2022. Plans should look at their STRR or the MARx UI in order to see the disenrollment effective date. The one-time process will include the Cleanup ID of MEPS90 on the STRR, the Monthly Membership Report (MMR) and the Late Enrollment Penalty Data File (LEPD). The MARx UI will display periods of Not Lawful Presence that are in the CMS database; however, no disenrollment or payment transactions will occur for retroactive periods.

IV. Plan Submitted Transactions for Not Lawfully Present Individuals:

A. Plan Enrollment Transactions

For new enrollments, Plans need to first check MARx to see if the beneficiary has an open-ended period of not lawfully present status. If the beneficiary has an open-ended period of not lawfully present status, the Plan should instruct the beneficiary to contact 1-800-MEDICARE. The 1-800-MEDICARE Team will work with SSA to have SSA systems updated to reflect the beneficiary's attainment of legal status. SSA will then send this data to MARx to reflect the beneficiary's legal status has been updated to reflect that the individual is a non-U.S. citizen who is lawfully present in the United States. The Not Lawfully Present data will then be sent from SSA to the MARx system daily. The beneficiary may request enrollment in an MA or Part D Plan using the SEP for non-U.S. citizens who become lawfully present, which begins the month the individual attains lawful presence status and ends the earlier of when the individual makes an enrollment election or two (2) calendar months after the month the individual attains lawful presence status. (42 CFR §§ 422.62(b)(16), 423.38(c)(21))

For applicants determined eligible for the *SEP for Non-U.S. Citizens who become Lawfully Present*, Plans will use SEP reason code 37 (Lawfully Present) under the 'General' SEP reason code group. For additional information about the SEP reason codes, please refer to Table 3-8 Election Type "S – Special Election Period (SEP)" Reason Code Table in the [MAPD Plan Communication Guide \(PCUG\)](#).

Plan submitted enrollments for a beneficiary with an effective date that falls within a Medicare Plan ineligibility period will be rejected with a new TRC 348 (Enrollment Rejected – Not Lawfully Present Period). If a submitted enrollment begins prior to a Medicare Plan ineligibility period and overlaps the period of not lawfully present status, the accepted enrollment will also include a disenrollment date prior to the start of the Medicare Plan ineligibility period. When the enrollment is entered and MARx automatically enters an enrollment end date, in addition to the

disenrollment reply code (TRC 018 Automatic disenrollment), the Plan will receive the new informational TRC 349 (Disenrollment Due to Not Lawfully Present Period). These disenrollments will receive a Disenrollment Reason Code (DRC) of 71 (Not Lawfully Present). CMS will begin populating the MARx automatic disenrollment for not lawfully presence with a 'S' election type code and an SEP reason code of 00 "SYS GENERATED ENRLMT/DMENRLMT".

B. Plan Disenrollment Transactions

Per CMS enrollment policy, plans are not permitted to disenroll a beneficiary based on a status of not lawfully present in the U.S. CMS will automatically process the involuntary disenrollment for individuals with an open period of not lawfully present status.

Attachment A: Updated MARx User Interface (UI) screens- Incarceration

Eligibility Screen (M232)

Medicare Advantage Prescription Drug (MARx)
Welcome | [Beneficiaries](#) | [Transactions](#) | [Payments](#)
[Find New Enrollment](#) | [Eligibility](#) | [Opt-Out](#)

Beneficiary: Eligibility (M232)
Role: MCO REPRESENTATIVE W/ UPDATE
Date: 8/4/2020
Print
Help...

Either a Beneficiary ID OR a combination of First Name, Last Name, Date of Birth, and a SSN/HICN or partial MBI is required.
+Indicates at least one of these is required

+Beneficiary ID
IAA1AA1AA11

First Name
Last Name
Suffix
Date of Birth
MM/DD/YYYY
SSN or HICN
Or
Partial MBI (3 characters minimum)
x

Find
Reset

Claim Number:
MBI Number: IAA1AA1AA11
Name: XTRUMELLE S XXORWIN
Birth Date: 12/29/1954
Date of Death:
Sex: F
Address: 123 ABC STREET
ANYTOWN, CA 12345-6789
Most recent State: CA (05)
Most recent County: THIS COUNTY (123)

Contract	PBP	Plan Type Code & Description	Start	End	Drug Plan
H5420	001	01 - HMO	01/01/2020	03/31/2020	Y

Entitlement Information

Part	Start	End	Option
A	12/01/2019		E
B	12/01/2019		Y

Eligibility Information

Part	Start	End
D	12/01/2019	

Medicare Plan Enrollment Ineligibility Periods Due to Incarceration

Start	End
08/01/2020	08/31/2020
04/01/2020	05/31/2020

Medicare Plan Enrollment Ineligibility Periods Due to Not Lawfully Present

Start	End
There is no not lawfully present information for the beneficiary	

Number of Uncovered Months

Start Date	Reset Indicator	Incremental Number of Uncovered Months	Cumulative Number of Uncovered Months	Record Add-TimeStamp
01/01/2020		0	0	08/03/2020 13:18:32

Employer Subsidy

There are no employer subsidies for the beneficiary

CARA Status

There is no CARA Status information for the beneficiary

The Medicare Plan Enrollment Ineligibility Due to Incarceration start date is the first day the beneficiary is ineligible to enroll in a plan. The Medicare Plan Enrollment Ineligibility Due to Incarceration end date is the last day the beneficiary is ineligible to enroll in a plan.

Status Activity (M256)

MBI # 1AA1AA1AA11

123 ABC STREET
ANYTOWN, CA 12345-6789

[Snapshot](#)
[Enrollment](#)
[Payments](#)
[Adjustments](#)
[Premiums](#)
[LEP](#)
[SSA - RRB](#)
[Utilization](#)
[MSA](#)
[Residence Address](#)
[Rx Insurance](#)
[Status Activity](#)

XTRUMELLE S. XXIRWIN

ACTIVE

DOB: 12/29/1954

Age: 65 Sex: FEMALE

State: CA (05) County: THIS COUNTY (123)

Status Activity (M256)

Role: MCO REPRESENTATIVE W/ UPDATE

Date: 8/4/2020

Close

Update...

Print

Help...

View hyperlink is only displayed when more information is available.

Information on the screen represents the beneficiary's status as of today's date.

SSA State and County Codes

State	County	History
CA (05)	SAN BERNARDINO (460)	View

Low Income Subsidy

LI Subsidy Start	LI Subsidy End	LI Premium Subsidy Level	LI Co-payment Level	History

Uncovered Months

Months	History
0	View

Health Status Flags

Active	Type	History
N	ESRD	
N	Other Insurance	View
N	NHC	
N	HHC	
N	Medicaid	
N	Hospice	
N	HCBS	
N	XREF	
N	Institutional	View
Y	Long Term Institutional	View
N	Disabled	

Eligibility Status Flags

Active	Type	History
Y	Part A	View
Y	Part B	View
Y	Part D	View
Y	Incarceration	View
N	Not Lawfully Present	
N	Employer Subsidy	
N	IC Model Status	
N	Opt-Out Part D	
N	Opt-Out MMP	

If the Active value is a “Y”, the beneficiary has a current period of incarceration. If the Active value is a “N”, either the beneficiary does not have any period of incarceration or the beneficiary has a historical incarceration period.

Status Detail: Incarceration (M257)

MBI #: 1AA1AA1AA11 123 ABC STREET ANYTOWN, CA 12345-6789	XTRUMELLE S. XXIRWIN ACTIVE	DOB: 12/29/1954 Age: 65 Sex: FEMALE State: CA (05) County: THIS COUNTY (123)
--	--	--

Status Detail: Incarceration (M257)

Role: MCO REPRESENTATIVE W/ UPDATE Date: 8/4/2020

Medicare Plan Enrollment Ineligibility Period Due to Incarceration

[Hide Audit](#)

Incarceration Start Date	Incarceration End Date	Medicare Plan Ineligibility Start Date	Medicare Plan Ineligibility End Date	Valid/Audit	CMS Notification Date	Record Update Timestamp	Record Audit Timestamp
10/01/2020	12/31/2020	11/01/2020	11/30/2020	A	08/03/2020 13:05:37	08/03/2020 13:08:04	08/03/2020 13:25:45
07/01/2020	09/30/2020	08/01/2020	08/31/2020	V	08/03/2020 13:03:57	08/03/2020 13:03:57	
03/01/2020	06/30/2020	04/01/2020	05/31/2020	V	08/03/2020 10:11:28	08/03/2020 10:11:28	

Field Definitions:

Incarceration Start Date – the first day the beneficiary was incarcerated.

Incarceration End Date – the last day the beneficiary was incarcerated.

Medicare Plan Ineligibility Start Date – the first day the beneficiary is ineligible to be enrolled in a Plan.

Medicare Plan Ineligibility End Date – the last day the beneficiary is ineligible to be enrolled in a Plan.

Valid/Audit – V is a valid record; A is an audited record.

CMS Notification Date – the day and time CMS received the incarceration period.

CMS Record Update Timestamp - the day and time the incarceration period was last updated.

Record Audit Timestamp – the day and time the incarceration period was removed.

Attachment B: Updated MARx User Interface (UI) screens- Not Lawfully Present

Eligibility Screen (M232)

Medicare Advantage Prescription Drug (MARx)
Welcome | [Beneficiaries](#) | [Transactions](#) | [Payments](#)
[Find](#) | [New Enrollment](#) | [Eligibility](#) | [Opt-Out](#)

Beneficiary: Eligibility (M232)

Role: MCO REPRESENTATIVE W/ UPDATE
Date: 8/4/2020

Print

Help...

Either a Beneficiary ID OR a combination of First Name, Last Name, Date of Birth, and a SSN/HICN or partial MBI is required.
+ Indicates at least one of these is required

+Beneficiary ID
2BB2BB2BB22

First Name

Last Name

Suffix

Date of Birth
MM/DD/YYYY

SSN or HICN

Or

Partial MBI (3 characters minimum)

Find

Reset

Claim Number:
MBI Number: 2BB2BB2BB22
Name: XDEJUNEA L XHALL
Birth Date: 07/28/1947
Date of Death:
Sex: M
Address: 456 XYZ AVENUE
ANYTOWN, WA 98765-4321
Most recent State: WA (50)
Most recent County: COUNTY (456)

Enrollment Information for 08/04/2020						
Contract	PBP	Plan Type Code & Description	Start	End	Drug Plan	
HS420	001	01 - HMO	01/01/2020	04/29/2020	Y	

Part
Start
End
Option

A
07/01/2012
E

B
07/01/2012
Y

Part
Start
End

D
07/01/2012

Start
End

There is no incarceration information for the beneficiary

Start
End

10/01/2020
10/31/2020

05/01/2020
08/31/2020

Number of Uncovered Months				
Start Date	Reset Indicator	Incremental Number of Uncovered Months	Cumulative Number of Uncovered Months	Record Add-Time Stamp
01/01/2020		0	0	06/26/2020 15:49:07

Employer Subsidy

There are no employer subsidies for the beneficiary

CARA Status

There is no CARA Status information for the beneficiary

The Medicare Plan Enrollment Ineligibility due to not lawfully present start date is the first day the beneficiary is ineligible to enroll in a plan. The Medicare Plan Enrollment Ineligibility due to not lawfully present end date is the last day the beneficiary is ineligible to enroll in a plan.

Status Activity (M256)

Status Activity (M256) - Google Chrome
portaldev.cms.gov/mmadi1/servlet/mmc/beneficiaries.find.statusActivity.BeneStatusActivityDisplayServlet?statusMsg=NO_MESSAGE

MBI #: 2682682622 XDEJUNEA L. XHALL DOB: 07/28/1947
456 XYZ AVENUE ANYTOWN, WA 98765-4321
State: WA (50) County: COUNTY (456)

Snapshot | Enrollment | Payments | Adjustments | Premiums | LEP | SSA - RRB | Utilization | MSA | Residence Address | Rx Insurance | **Status Activity**

Status Activity (M256) Role: MCO REPRESENTATIVE W/ UPDATE Date: 8/4/2020 [Close](#) [Update...](#) [Print](#) [Help...](#)

View hyperlink is only displayed when more information is available.
Information on the screen represents the beneficiary's status as of today's date.

SSA State and County Codes		
State	County	History
WA (50)	ISLAND (140)	View

Health Status Flags		
Active	Type	History
N	ESRD	
N	Other Insurance	View
N	NHC	
N	HHC	
N	Medicaid	
N	Hospice	
N	HCBS	
N	XREF	
N	Institutional	
Y	Long Term Institutional	View
N	Disabled	

Eligibility Status Flags		
Active	Type	History
Y	Part A	View
Y	Part B	View
Y	Part D	View
N	Incarceration	
Y	Not Lawfully Present	View
N	Employer Subsidy	
N	IC Model Status	
N	Opt-Out Part D	
N	Opt-Out MMP	

Low Income Subsidy				
LI Subsidy Start	LI Subsidy End	LI Premium Subsidy Level	LI Co-payment Level	History

Uncovered Months	
Months	History
0	View

If the Active value is a “Y”, the beneficiary has a current period of not lawfully present. If the Active value is a “N”, the beneficiary either does not have any period of not lawfully present or has a not lawfully present historical period.

Status Detail: Not Lawfully Present (M257)

Status Detail: Not Lawfully Present (M257) - Google Chrome
portaldev.cms.gov/mmadi1/servlet/mmc/beneficiaries.find.statusDetail.BeneStatusDetailDisplayServlet?statusMsg=NO_MESSAGE

MBI #: 2682682622 XDEJUNEA L. XHALL DOB: 07/28/1947
456 XYZ AVENUE ANYTOWN, WA 98765-4321
State: WA (50) County: COUNTY (456)

Status Detail: Not Lawfully Present (M257) Role: MCO REPRESENTATIVE W/ UPDATE Date: 8/4/2020 [Close](#) [Print](#) [Help...](#)

Medicare Plan Enrollment Not Lawfully Present [Hide Audit](#)

Not Lawfully Present Start Date	Not Lawfully Present End Date	Medicare Plan Ineligibility Start Date	Medicare Plan Ineligibility End Date	Valid/Audit	CMS Notification Date	Record Update Timestamp	Record Audit Timestamp
11/15/2020	12/31/2020	12/01/2020	12/31/2020	A	11/03/2020 00:40:08	06/30/2020 11:18:25	06/30/2020 11:18:13
09/05/2020	10/20/2020	10/01/2020	10/31/2020	V	09/06/2020 00:40:08	06/26/2020 15:54:24	
04/02/2020	08/16/2020	05/01/2020	08/31/2020	V	04/03/2020 00:37:08	06/26/2020 15:53:00	

Field Definitions:

Not Lawfully Present Start Date – the first day the beneficiary was not law fully present.

Not Lawfully Present End Date – the last day the beneficiary was not law fully present.

Medicare Plan Ineligibility Start Date – the first day the beneficiary is ineligible to be enrolled in a Plan.

Medicare Plan Ineligibility End Date – the last day the beneficiary is ineligible to be enrolled in a Plan.

Valid/Audit – V is a valid record; A is an audited record.

CMS Notification Date – the day and time CMS received the not law fully present period.

CMS Record Update Timestamp - the day and time the not law fully present period was last updated.

Record Audit Timestamp – the day and time the not law fully present period was removed.

