



October 7, 2020

## **Medicare Initial, Special and General Enrollment Periods Explained**

Maura Carley, President and Founder

### **Medicare's Initial Enrollment Period – The Initial Transition to Medicare**

Medicare's Initial Enrollment Period begins three months prior to the month of one's 65th birthday, includes the month of one's birthday and ends three months after the birthday month.

Most people transition onto Medicare when they are first eligible at age 65. This means they are registering for Medicare Part A and Medicare Part B and typically enrolling in either a private Medicare Supplement and Part D Plan or an Advantage Plan.

Some are eligible for Medicare before age 65 due to serious illness or disability. These individuals are automatically enrolled in Medicare Part A and Medicare Part B because they are receiving Social Security benefits. Anyone in this situation should determine whether they should keep Medicare Part B if they have active group coverage.

Those who maintain group coverage at age 65 and afterward through an employer of 20 or more people through active employment or a spouse's active employment should consider enrolling in Medicare Part A during their Initial Enrollment Period or later but can postpone enrollment for Medicare Part B (see below). Some with active group coverage enroll in Parts A and/or B during their Initial Enrollment Period as a secondary source of coverage after the group coverage although this is less common than it used to be. Those who maintain group coverage through an employer at age 65 and afterward through an employer of fewer than 20 people should determine if they are required to enroll in Medicare A and B which is then primary (pays first).

### **Medicare's Special Enrollment Period – For Those Who Maintain Active Group Coverage Beyond 65**

One covered by active group coverage through their employment or a spouse's employment at age 65 can enroll in Part B through a Special Enrollment Period any time after the end of the Initial Enrollment Period. Medicare's Special Enrollment Period for Medicare Part B is in effect the entire time one maintains active group coverage through employment or a spouse's employments and extends eight months beyond the end of group coverage or the end of employment whichever comes first. Most individuals who work beyond age 65 should plan to go on Medicare Part B as primary to coincide with their retirement. Their active group coverage should end one day and Medicare Part B and typically either a private Medicare supplement and

Part D Plan or Medicare Advantage Plan enrollment should all take effect the first of the month following the end of group coverage.

Most individuals going on to Medicare Part B are not eligible for COBRA (temporary extension of group coverage) because they are already on Medicare Part A. In order to be eligible for COBRA after age 65, an individual should already be on Medicare Part A and Medicare Part B. It is rare for this to be a good option since those who are eligible would pay for COBRA as secondary coverage. It is a desirable alternative for a few but discussion of that is beyond the scope of this work. In general, most people who work beyond age 65 are not eligible for COBRA and it is rarely wise to elect it. Not enrolling in Medicare Part B consistent with enrollment rules (like electing COBRA and postponing Medicare enrollment beyond the eight-month Special Enrollment window) can result in premium penalties for life.

### **Medicare's General Enrollment Period – NOT the Recommended Way to Transition to Medicare**

Medicare's General Enrollment is the first quarter of every year for a Part B effective date the following July 1<sup>st</sup>. This enrollment period should be avoided since it is designed to be punitive. Those using the General Enrollment Period usually have a gap in coverage (which can be as long as fifteen months) and pay lifetime Part B Penalties.

We suggest you follow these steps:

- Determine if you need Medicare to be in place at age 65. This is true of virtually everyone except those working for or married to someone working for companies of 20 or more employees for whom their group coverage is primary. You often have to be enrolled in both Medicare A and B if you have coverage through a company of fewer than 20 people but there are exceptions. If you work for a business with 20 or fewer employees and your broker says you don't need Part B, you should get a letter verifying you don't need to be enrolled in Part B from the insurer or verify that information through your state Insurance Department.
- If you continue to have active group coverage through an employer of 20 or more through your employment or a spouse, consider whether you should enroll in Medicare Part A which would be secondary to the group coverage. The only reason not to enroll in Medicare Part A would be if your plan is a high deductible health plan with a health savings account. IRS rules provide that someone on Medicare Part A should not make contributions or have contributions made on their behalf to a health savings account. Know that if you defer Part A enrollment, Social Security will typically make your Part A retroactive for six months so you should plan when to end health savings account contributions.
- If you are already receiving Social Security before your 65<sup>th</sup> birthday, you will automatically be enrolled in Medicare Parts A and B and sent your Medicare card. If you have other group coverage that is primary through a working spouse, you should consider whether or not you want Medicare Part B. If you choose to opt out, you will receive instructions with your Medicare card.

- If you aren't getting Social Security at 65 and want to enroll in Medicare, you enroll in Medicare A and Medicare B through Social Security. If you have paid into Social Security as a worker you can enroll on-line through [www.ssa.gov](http://www.ssa.gov). Go to that web site, press "Enroll in Medicare" and proceed through the process. You must have a user name and password to a My Social Security account in order to use the on-line Medicare enrollment tool. You can also call your local Social Security office and make a telephone appointment to enroll or call the national Social Security number, 1-800-772-1213. But remember, do this well in advance of the month of your 65<sup>th</sup> birthday. Better to act early in the Initial Enrollment Period so that you optimize your chances of having your Medicare card well in advance of its effective date (which is usually the first of the month of the month of your birthday) just in case anything goes wrong.
- If you did not pay into Social Security and will be eligible for Medicare through a spouse who is not yet taking Social Security, former spouse or deceased spouse, at least for now you can't use the on-line enrollment tool on [ssa.gov](http://ssa.gov). In that case you need to contact Social Security and make a telephone appointment. Prior to the Covid-19 era, you could make an in-person appointment at your local office. Hopefully, this option will be available again once it is safe to have in-person meetings.
- Depending on the information about you in the Social Security system, you may have to produce a birth certificate or a marriage certificate or proof of citizenship.
- If you are going to be eligible for Railroad Retirement Benefits, YOU DO NOT GO THROUGH SOCIAL SECURITY TO ENROLL IN MEDICARE. You must work through the Railroad Retirement Board. The timeframes are the same as enrolling in Medicare through Social Security.
- If you are planning to transition on to Medicare Part B during a Special Enrollment Period and haven't enrolled in Medicare Part A you should enroll in Part A following the above steps in order to obtain your Medicare number. For Part B, the easiest way to prove creditable coverage is to have every former employer who provided active coverage after age 65 complete a CMS L564 form. These forms, along with a CMS 40B, can be sent via Federal Express to your local office. When Social Security offices reopen, these forms can be hand-delivered. For now, Social Security is also allowing individuals to apply for Medicare Part B during a Special Enrollment online due to the COVID-19 Pandemic. You can complete enrollment here- <https://secure.ssa.gov/mpboa/medicare-part-b-online-application/>. Be aware that the portal may be temporary.
- Medicare numbers are a randomly generated 11 digit combination of letters and numbers. The first place you can see your Medicare number is on your My Social Security account web site. Be on the look-out for correspondence from Social Security welcoming you to Medicare and your Medicare card. If you can register on [mymedicare.gov](http://mymedicare.gov), then you know you've been enrolled and may just need to request an additional card if you didn't receive it. When you get the card be sure to see that the Medicare Part A and B effective dates on the front of the card match what you expected.

- We also advise calling the Medicare Coordination of Benefits number, 800-999-1118, and following the prompts to their automated system to verify that agency has information which matches the date you expect Medicare to be primary.
- Early in the Initial Enrollment Period and several months prior to your retirement or your spouse's retirement for a Special Enrollment Period you should determine what you want in place in addition to Medicare A and B and manage the enrollment process for other coverage. You might have retiree coverage which will be secondary to Medicare, or want to purchase a Medicare Supplement and a Part D Plan or consider enrolling in a Medicare Advantage Plan. **Enrollment in Medicare or any Medicare-related coverage during the Initial Enrollment Period doesn't require proof of prior creditable coverage.**
- Register on any other relevant web site associated with your retiree medical and drug benefits, Part D Prescription Drug Plan, Medicare Supplement or Medicare Advantage Plan.
- If are going on to Medicare at age 65 and you had private, individual coverage, you almost always want to cancel it to coincide with your Medicare effective date. Do this in writing and keep a copy for your records.
- If tax returns filed with the IRS indicate your Part B and/or Part D premiums should be income-indexed, you will receive a letter from Social Security indicating what the premiums will be. Individuals with a MAGI (modified adjusted gross income) over \$87,000 and couples with a MAGI over \$174,000 pay additional premiums. Note that the IRS factors in tax exempt interest income as income for this calculation. Review this letter carefully. Income-indexed premiums are based on tax returns filed two year earlier.
- If you are an individual who has reported more than \$87,000 in income or a couple who has reported more than \$174,000 in income recently to the IRS and your Medicare happens to coincide with a significant drop in income due to retirement or work reduction, consider completing form SSA-44, Medicare Income-Related Monthly Adjustment Amount (copy in appendix). Discuss the form with a Social Security representative and send it in. This will allow Social Security to base your Part B and Part D premiums (if you've enrolled in Part D) on current, projected income rather than your income tax returns from two years ago.
- Inform all of your doctors and other medical providers of your Medicare effective date and any other coverage you have and which should pay first. Medicare is almost always primary. More than likely, you will be asked for your Medicare card.

Please go to the Education tab of our web site, [healthcarenavigation.com](http://healthcarenavigation.com), for more information on Medicare Enrollment Periods. Under Resource Documents for *Medicare: Navigating Traps and Gaps*, the first document attached, Understanding Medicare Enrollment Periods, is very comprehensive and also addresses Part D Open Enrollment and the Annual Medicare Enrollment Period.