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TO: All Medicare Advantage Organizations (MA), Prescription Drug Sponsors (PDP), Cost Plans, Program of All-Inclusive Care for the Elderly (PACE), and Demonstration Organizations

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SUBJECT: Integrated Care Special Enrollment Period Updates for Contract Year 2025

In the CY 2025 Final Rule ([CMS-4201-F3](#) and [CMS-4205-F](#)), the Centers for Medicare & Medicaid Services (CMS) published regulation changes that impact enrollment. The Contract Year 2025 Medicare Advantage and Part D Enrollment and Disenrollment Guidance,¹ released on August 8, 2024, further described these changes. This memorandum provides guidance on enrollment processes related to the special enrollment period (SEP) for integrated care.²

Background and Enrollment Processing

In the CY 2025 Final Rule, CMS created a new SEP at 42 CFR 423.38(c)(35) for enrolling in certain integrated dual eligible special needs plans (D-SNPs). We refer to this new SEP as the “integrated care SEP.” Effective January 1, 2025, full-benefit dually eligible individuals may use the integrated care SEP to enroll, once per month, into a fully integrated dual eligible special needs plan (FIDE SNP), highly integrated dual eligible special needs plan (HIDE SNP), or applicable integrated plan (AIP). The integrated care SEP is available only to facilitate aligned enrollment, as defined in 42 CFR 422.2, in the FIDE SNP, HIDE SNP, or AIP and the affiliated Medicaid managed care organization (MCO). That means full-benefit dually eligible individuals may use the integrated care SEP only if they are enrolled in or in the process of enrolling in a Medicaid managed care organization (MCO) affiliated with the D-SNP in which they are enrolling through the SEP.

¹ <https://www.cms.gov/files/document/cy-2025-cd-enrollment-and-disenrollment-guidance.pdf>

² Note that this SEP does not apply to Medicare-Medicaid Plans (MMPs) as all capitated model demonstrations under the Financial Alignment Initiative include Medicare waivers that allow individuals to enroll into MMPs on a monthly basis.

The integrated care SEP may be used once per month with an enrollment effective date of the first of the following month.

Beginning January 1, 2025, eligible FIDE SNPs, HIDE SNPs, and AIPs must submit enrollment transactions using the new integrated care SEP by selecting MARx Election Type Code 'P- SEP IC.' The corresponding Online Center Enrollment (OEC) Reason Code is 'INT'.

A technical assistance resource for the integrated care SEP and Dual/LIS SEP is available here: <https://cmsnationaltrainingprogram.cms.gov/resources?keys=New+Special+Enrollment+Periods>. Please contact your CMS Account Manager and the MMCO Enrollment Team at <mailto:MMCOEnrollment@cms.hhs.gov> with any questions.