

Volunteer continuing education

Statewide Health Insurance Benefits Advisors (SHIBA)

Medigaps

- CMS Module 03 – Supplemental Insurance (Medigap) Policies
- Switching Medicare Supplement (Medigap) plans
- Updated MIPPA instructions for STARS Beneficiary Contacts

October 2018

For volunteer training only – not for distribution

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Handouts for October training may be found on [My SHIBA](#):

1. Switching Medicare Supplement (Medigap) plans job aid
2. CMS Module 3 WA SHIBA version: Medicare Supplement Insurance (Medigap) Policies – notes version (PDF)
3. Medigaps and the year 2020
4. STARS Beneficiary Contacts Special Instructions SHIBA job aid

Items on [My SHIBA](#) or other sources for October training:

- October packet
- Washington state mandated coverage for replacement policies—rates on a community-rated basis Revised Code of Washington [RCW](#)
- Approved Medicare Supplement (Medigap) plans [list](#). This is will be updated at the end of September and posted to [My SHIBA](#).

Volunteer learning objectives

After completing the October 2018 monthly training, including *Module 3: Medicare Supplement Insurance (Medigap) Policies*, volunteer advisors and coordinators will be able to:

- Explain what Medigap policies are
- Recognize and define key Medigap terms
- Explain steps to buying a Medigap policy
- Define the best time to buy a Medigap policy
- Explain what changes take place under MACRA
- Explain the various guaranteed issue rights under Federal laws and Washington state laws
- Learn where to get information on Medigap rights and protections

Acronyms

ACL	Administration for Community Living
CHIP	Children's Health Insurance Program
CMS	Centers for Medicare and Medicaid Services
COBRA	Consolidated Omnibus Budget Reconciliation Act
EGHP	Employer Group Health Plan
ESRD	End-Stage Renal Disease
FL	Florida
HMO	Health Maintenance Organization
MA	Medicare Advantage
MA-PD	Medicare Advantage Prescription Drug
MACRA	Medicare Access and CHIP Reauthorization Act of 2015
MIPPA	Medicare Improvement for Patients & Providers Act
NTP	National Training Program
OEP	Open Enrollment Period
OM	Original Medicare
PACE	Programs of All-Inclusive Care for the Elderly
PDP	Prescription Drug Plan
PDF	Portable Document Format
PPO	Preferred Provider Organization
QMB	Qualified Medicare Beneficiary Program
RCW	Revised Code of Washington
RTC	Regional Training Coordinator
Rx	Prescription
SEP	Special Enrollment Period
SHIP	State Health Insurance Assistance Program
SNF	Skilled Nursing Facility
STARS	SHIP Tracking and Reporting System
SSA	Social Security Administration
TTY	Teletypewriter/Text Telephone
WA	Washington

Troubleshooting and sharing time

Please take some time to share with your group any questions about previous months' [continuing education training](#), including transitioning to STARS:

- ☐ July training on the Volunteer Handbook and the Volunteer Risk Program Management (VRPM) policy manual
- ☐ Medicare Plan Finder webinar (located with September materials)
- ☐ Discuss content your group couldn't cover during the September Medicare Open Enrollment and Part D training
- ☐ STARS database entry and desk aids, as well as tips and hints

Notes:

CMS Module 3: Supplemental Insurance (Medigap) Policies

After viewing the Module 3 slides, spend time discussing this content with your group.



Handout

PowerPoint pages with notes
50 pages

Resources:

Module 3, Washington SHIBA versions, located on [My SHIBA](#) under monthly in-person training

- PowerPoint point
- PDF of PowerPoint
- PDF of PowerPoint slides with notes

Notes


Notes

Some Medigaps phased out in 2020 for certain beneficiaries

We are starting to get questions from our clients such as, "I heard Medigap Plans C and F are going away so how can I switch?"

The answer: It's not quite that simple.

This synopsis handout outlines the upcoming changes and timeline. Let's review it so we can be ready to answer client questions.

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WASHINGTON STATE

Medigaps and the year 2020

You may have heard about new federal legislation that will affect Medigap Plans C and F in 2020.

The Medicare Access and CHIP Reauthorization Act (MACRA), which the federal government enacted in 2015, eliminates any Medigap plans that cover the Part B deductible, like Plans C and F, to "newly eligible" beneficiaries starting in 2020.

For clients who bought and still have a plan C or F before Jan. 1, 2020

- Plans are guaranteed renewable. Clients don't need to take any action or make any changes, unless they want to make a change.

For clients considering a new Medigap on or after Jan. 1, 2020

- If a client turned 65 **before** Jan. 1, 2020, they can still buy a Plan C or F (as long as the company will sell it to them).
- If a client turns 65 on or after Jan. 1, 2020, they **cannot** buy a Plan C or F. It's ok to rely on the client's self-reported 65th birthday or when they'll turn 65. This MACRA rule is based on age, **not when the client enrolled in Medicare**. If the client turns age 65 starting in 2020, they're subject to MACRA.

Anyone, regardless of age, who becomes eligible for Medicare Part A on or after Jan. 1, 2020, cannot buy Medigap Plans C or F.

Example from Centers for Medicare & Medicaid Services (CMS)
Question: I turn 65 in November 2019 and am eligible for Medicare. If I'm still working and covered by my employer-group employee medical plan, there might not be any reason for me to enroll in Part B during my birthday month. If I elect not to enroll, and end up enrolling when I retire sometime after 1/1/2020, would I be viewed as a "newly eligible" Medicare beneficiary and as a result would not be able to buy C or F?

- Over -

SHIBA | 800-562-6900 | October 2018 volunteer training | prepared 9/12/2018
For training purposes. Not for distribution.

Handout
2 pages

Resource:

This document may be found on [My SHIBA](#) under monthly in-person training for October 2018.

Switching Medicare Supplement (Medigap) plans

Why are we talking about Medigaps now, when they have no annual open enrollment period? Many people might consider leaving a Medicare Advantage (MA) plan during Medicare's Open Enrollment Period (OEP) and clients want to know what their options are if they switch to a Medigap.

Washington State Office of the Insurance Commissioner (OIC) • Statewide Health Insurance Benefits Advisors (SHIBA)

Switching Medicare Supplement (Medigap) plans

Washington state does not require insurers to offer Medigap plans to people on Medicare under age 65, but clients can contact insurers directly to see if they might sell them a Medigap.

To buy a Medigap, Medicare clients must have both Medicare Part A and Part B.

For technical questions on any of the client situations below, refer clients to an OIC Health Compliance Analyst at 1-800-562-6900.

You have a guaranteed issue right if:	You have the right to buy:	You cannot apply for a Medigap policy:	Waiting period and source:
1 You're age 65+ and within the first 6 months of your Part B effective date	Any OIC-approved Medigap plan that's sold in Washington state by any insurer.	Within the first 6 months of your Part B effective date	Up to a 90-day waiting period SCW 48.66.025 app.let.ins.wa.gov/SCW
2 You're in a Medicare Advantage plan (MA) plan (like an HMO or PPO) and your plan's leaving Medicare or stops giving care in your area, or you move out of the plan's service area	An OIC-approved Medigap Plan A, B, C, F, K or L sold in Washington state by any insurer.	As early as 60 calendar days before your coverage ends, but no later than 63 calendar days after your coverage ends. Your Medigap can't start until your MA plan ends.	No waiting period SCW 48.66.055(1)(b)(i) app.let.ins.wa.gov/SCW
3 You have Original Medicare and an employer group health plan (including retiree, COBRA or union coverage) that pays after Medicare pays and that plan is ending	An OIC-approved Medigap Plan A, B, C, F, K or L sold in Washington state by any insurer. If you have COBRA, you can either buy a Medigap plan right away or wait until the COBRA coverage ends.	No later than 63 calendar days after the latest of these 3 dates: 1) Date coverage ends 2) Date on notice you get telling you the coverage is ending 3) Date on a claim denial if that's how you know coverage ended	No waiting period SCW 48.66.055(2)(a) app.let.ins.wa.gov/SCW

FOR SHIBA VOLUNTEER USE ONLY - NOT FOR DISTRIBUTION TO CLIENTS

Page 1

Handout
4 pages

Resources:

Switching Medicare Supplement (Medigap) plans

From [My SHIBA](#), search for "switching Medicare supplement plans."

When can I sign up or switch Medigap plans?

www.insurance.wa.gov/when-can-i-sign-or-switch-medigap-plans

Medigap scenarios group discussion

1. Use the "Switching Medicare Supplement (Medigap) plans" **handout** to answer the following *nine* questions.
2. Indicate which line number from the left side of the handout provides the answer to the question(s).
3. Review the answers starting on **page 19**.

Scenario 1: I signed up for a Medigap Plan K a couple of years ago, because the premiums were lower. I wasn't going to the doctor much, but a couple of months ago, I had a health scare and am thinking about changing.

Questions:

1. Could I switch to a Plan F?
2. What about a high-deductible Plan F?
3. Will I have to pass a health screening (medical underwriting?)
4. Will there be a waiting period for the new plan to cover me?

Which line provides the correct answer? _____

Scenario 2: I am 73, have cancer and just got a letter from my Medicare Advantage plan that they will no longer be available in my county. I'm thinking about switching to Original Medicare with a Medigap and a Part D plan.

Question: Will I be allowed to do this?

Which line provides the correct answer? _____

Scenario 3: (See the prior question): I am 57, have cancer and just got a letter from my Medicare Advantage plan that they will no longer be available in my county. I'm thinking about switching to Original Medicare with a Medigap and a Part D plan.

Question: Will I be allowed to do this?

Which line provides the correct answer? _____

Scenario 4: I will be 66 soon and have been in a Medicare Advantage (MA) plan since I started Medicare at age 65. I am frustrated with the network rules and I also am thinking about going to Arizona for the winter.

Question: Can I get a Medigap instead?

Which line provides the correct answer? _____

Scenario 5: I have been on Medicare for 4 years due to disability and will be 65 in three months. I am in an MA plan now and go to the doctor often and think I pay a lot out of pocket. Someone told me I can get a Medigap now without a health screening.

Question: Is that true?

Which line provides the correct answer? _____

Scenario 6: I am 67 and just moved from County A in Washington state to County B in Washington state. My Medicare Advantage plan does not offer coverage in my new county. I have diabetes and heart disease, and I am not sure if I can pass a health screening.

Question: What if I want to enroll in a Medigap instead of another Medicare Advantage (MA) plan? Can I do that?

Which line provides the correct answer? _____

Scenario 7: I'm 82 and my retiree health insurance that supplemented Medicare is ending because my company went bankrupt.

Question: What are my options for supplementing Medicare?

Which line provides the correct answer? _____

Scenario 8: I am 70 and have a retiree health plan from a large aerospace company. The premiums are over \$300 per month.

Question: What other options can I look at?

Which line provides the correct answer? _____

Scenario 9: I am 59 and on Medicare due to disability. I have been covered by my spouse's employer plan and the coverage is pretty good, but we have to pay \$600 per month for my coverage. Someone told me I can get better coverage for less money if I switch to a Medigap.

Question: Can I do this?

Which line provides the correct answer? _____

Medigaps and snowbirds

- Medigaps must follow federal and state laws, but states provide the routine day-to-day oversight of standardized Medigap policies.
- In general, people can enroll in a Medigap plan in the state they reside in per Social Security records, but the plans can decide if they will sell a Medigap to someone with a different address.
- If someone buys a Medigap plan in Washington state, they'll need to meet the residence requirements of that insurance company – that is between the client and the company (not SHIBA).
- People need to be truthful on their applications or they could get their Medigap plan canceled.
- Regardless of someone's address in terms of what state the Medigap plan is issued in, that Medigap can be used in other states as supplementary to Medicare, unless it's a Medicare Select plan.
- If a client buys a plan in another state, such as Florida, the buyer must meet Florida insurance requirements.

Washington state snowbird scenario:

A couple spends six months in Washington (WA) where they have a big house, kids, established doctors, etc. Their car is registered to WA and they vote in WA. The Social Security Administration (SSA) has their WA address because the couple thinks of this as their primary residence and the kids can get their mail when they're gone to Florida (FL).

They spend six months a year in FL for sunshine and also own a home there. It's smaller. They use a FL address to pay their federal income tax.

They're enrolling in Medicare and want to know if they can buy a Medigap in FL if it's a better deal for them.

Question from a client: Can you help me understand how I should shop for a Medigap plan with two different addresses in different states?

Take time with the group to discuss. See page 21 for the answer.

STARS Beneficiary Contacts - qualifying MIPPA topics

The Administration for Community Living (ACL) provided updates to the SHIPS on how to document qualified MIPPA topics in STARS. There are several new Topics Discussed that will allow you to change the MIPPA field from "No" to "Yes."


Updated MIPPA Beneficiary Contact Instructions
Effective September 2018

MIPPA

Send to SMP

SIRS eFile ID

SIRS Reference Number

☒ Yes
 ☐ No
 

☐ Yes
 ☒ No

MIPPA field defaults to "No". Change to "Yes", when you are able to check any appropriate box(es) in **Topics Discussed**

Qualifying MIPPA Topics Discussed	
Part D Low Income Subsidy (LIS/Extra Help) section	Medicaid section
• Application Assistance	• Application Submission
• Application Submission	• Benefit Explanation
• Benefit Explanation	• Eligibility/Screening
• Eligibility/Screening	• Medicaid Application Assistance
	• MSP Application Assistance
	• Recertification

Handout
3 pages

Resource:

Find the *STARS Beneficiary Contact special instructions* under October 2018 training on [My SHIBA](#).

Resources

Medigaps

Medigap (Medicare Supplement) plans

www.insurance.wa.gov/medigap-medicare-supplement-plans

Find *10 Standardized Medicare Supplement (Medigap) plans* chart on the [SHIBA publications page](#).

Find *July 2018 Approved Medicare Supplement (Medigap) plans* on the [SHIBA publications page](#).

What is a Medigap plan and why should I buy it?

www.insurance.wa.gov/what-medigap-plan-and-why-should-i-buy-it

Find *Comparing Medicare Supplement (Medigap) and Medicare Advantage plans* on the [SHIBA publications page](#).

For more information on Medigap, see Module 3 in the Training Library:

cmsnationaltrainingprogram.cms.gov/?q=global-search&search=Medigap+policies&combine=Medigap+policies

2018 Choosing a Medigap Policy: A Guide to Health Insurance for People with Medicare

www.medicare.gov/Pubs/pdf/02110-Medicare-Medigap.guide.pdf

Find out more about *Switching Medicare Supplement (Medigap) plans* by visiting www.insurance.wa.gov/when-can-i-sign-or-switch-medigap-plans and also by searching for, “switching Medicare supplement plans” from [My SHIBA](#).

Guaranteed issue rights

Source: www.medicare.gov/supplement-other-insurance/when-can-i-buy-medigap/guaranteed-issue-rights-scenarios.html

MACRA

Implementation Guidance for MACRA Revisions to Medigap Model Regulation

www.naic.org/documents/cmte_b_senior_issues_related_macra_faq_2018.pdf

See answers to frequently asked questions #6, 17, 23, 26, CMS response directly below #26.

What's MACRA?

www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Value-Based-Programs/MACRA-MIPS-and-APMs/MACRA-MIPS-and-APMs.html

H.R.2 - Medicare Access and CHIP Reauthorization Act of 2015

www.congress.gov/bill/114th-congress/house-bill/2 Section 401

H.R. 2 MEDICARE ACCESS AND CHIP REAUTHORIZATION ACT (MACRA)

waysandmeans.house.gov/UploadedFiles/Bipartisan_SGR_Package_Section_by_Section_FINAL_032415.pdf Sec. 401 Medigap

Review

We've covered:

- CMS Module 3: Supplemental Insurance (Medigap) Policies
- Some Medigaps phased out starting in 2020 for certain beneficiaries
- Switching Medicare Supplement (Medigap) plan with scenarios
- Medigaps and snowbirds
- STARS Beneficiary Contacts – qualifying MIPPA topics

Answers to Medigaps scenarios

Using the “Switching Medicare Supplement (Medigap) plans” job aid **handout** you should be able to answer the questions to find the following answers to the scenarios starting on page 10.

Scenario 1: Have a Medigap Plan K. Can I switch to a Plan F?

Answer: See #8 on the job aid. No health screening, no waiting period for either F or high-deductible F.

Scenario 2: MA plan no longer available in my county.

Answer: See #2 on the job aid. Can join a Medigap Plan A, B, C, F, K or L without health screening. And no waiting period for coverage.

Scenario 3: Same scenario as Scenario 2 – except a different age.

Answer: See #2 on the job aid, and disclaimer about people under age 65 at top of the page: “Washington state does not require insurers to offer Medigap plans to people on Medicare under age 65, but clients can contact insurers directly to see if they might sell them a Medigap.” It is unlikely that people in this situation will be able to purchase a Medigap. They can look at other MA plans, look into coverage under the Washington State Health Insurance Pool ([WSHIP](#)) Medicare Basic Plan, or if they have low income, can apply for Medicaid or QMB.

Scenario 4: Frustration with MA network rules and thinking of going to Arizona.

Answer: See #5 on the job aid. You have a Trial Right for an MA plan within the first 12 months of enrollment if you joined a MA plan for the first time ever and want to return to Original Medicare. You can sign up for any Medigap sold in

Washington state without a health screening. And no waiting period for coverage. (For more information see *Medicare & You 2018*, p. 82.)

Scenario 5: Questioning if they can get a Medigap without a health screening.

Answer: See #1 on the job aid. You will be in your Medigap Open Enrollment Period (OEP) for six months starting with the month you turn 65. You can buy any Medigap offered in Washington state. Note: There's a limited time to switch or drop the MA plan and return to Original Medicare. This time period ends 3 months after the month you turn 65. You can also enroll in a stand-alone Part D plan at this time. (See page 3 of this document: www.medicare.gov/Pubs/pdf/11219-Understanding-Medicare-Part-C-D.pdf)

Scenario 6: Enrolling in a Medigap instead of another MA plan.

Answer: See #2 on the job aid. You can join a Medigap Plan A, B, C, F, K or L without a health screening. And no waiting period for coverage. If your MA plan includes Part D, you'll have the chance to switch to a stand-alone Part D plan.

Scenario 7: Medicare ending due to company going bankrupt.

Answer: See #3 on the job aid. You can join a Medigap Plan A, B, C, F, K or L without a health screening. And no waiting period for coverage. If you're also losing drug coverage, you'll get a coordinating Part D Special Enrollment Period. If you want, another option is that you can enroll in an MA plan if one's available in your area.

Scenario 8: Retiree health plan from large aerospace company.

Answer: See #9 on the job aid. You can get any Medigap Plan B – N (except the HCA Blue Cross Premiera Plans) without a health screening. And no waiting period. If you're also losing/leaving drug coverage, you'll get a coordinating Part D Special Enrollment Period. Another option is enrolling in an MA plan if one's available in your area. However, compare costs and consider any additional coverage that you might lose, such as dental or vision.

Scenario 9: Being 59 and on Medicare due to a disability.

Answer: See first page of the job aid: "Washington state does not require insurers to offer Medigap plans to people on Medicare under age 65, but clients can contact insurers directly to see if they might sell them a Medigap." Another option is to enroll in an MA plan, if one's available in your area. However, be sure to compare costs and consider any additional coverage you might lose, such as dental or vision.

Washington state snowbird scenario from page 14

Answer: Client should be sure to disclose to any company the whole picture of their addresses and living situation. It'll be up to the company to review its rules for residency and on whether it can or can't offer the client a policy.

Reminders and future training

Evaluation

Please fill out the training evaluation. We value your feedback!

Future training

- ***November training ideas:*** LINET, scavenger hunt part 2, refreshing the binders, new handouts that were not included in March, end of year review/overview and scenarios on new handouts. Let us know what you think. If you have ideas, include them on your evaluation form and return it to your RTC.
- We will not offer continuing education training in December.
- Update on evaluation feedback: We're working on reducing the amount of paper we distribute. See the back page and send us your feedback.

Continuing education evaluation

Date of Training: _____ Training Location: _____

How can SHIBA improve the monthly trainings?

What additional trainings within our SHIBA scope would you like to see?

What SHIBA training materials (including QRCs) would you like to see added to My SHIBA?

Other: _____

Optional: If you would like to be contacted, please provide your name and contact information. Someone in our office will contact you. Thank you!

Name: _____

Day Phone: _____ Email: _____

If you prefer to give electronic feedback about curriculum or training, please contact: Diana Schlesselman: dianas@oic.wa.gov or Liz Mercer: lizm@oic.wa.gov.

If you did not answer this in September, what is your preferred method of receiving monthly training content? Content will always be available on [My SHIBA](#) and as a paper packet if preferred.

Electronic or Paper (circle one)

Thank you!