

Important Changes in 2025 to Special Enrollment Periods for Low-Income Medicare Enrollees

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This fact sheet covers Medicare changes starting January 2025: The introduction of [two new Medicare Special Enrollment Periods \(SEPs\)](#) that will impact when low-income individuals can join, switch, or leave Medicare Advantage Plans or Prescription Drug Plans.

Joining, Switching, or Leaving Medicare Advantage Plans

A Medicare enrollee can choose to get their health care through Original Medicare (also known as Traditional) or a Medicare Advantage plan. During certain time periods, enrollees can **join** a Medicare Advantage plan from Original Medicare, **switch** from one Medicare Advantage plan to another, or **drop** their Medicare Advantage plan for Original Medicare.

MEDICARE ENROLLMENT AND DISENROLLMENT AT A GLANCE

Individuals have the opportunity to **join** a Medicare Advantage plan during their Initial Enrollment Period, which is a seven-month period around the time a person first becomes eligible for Medicare. They also have an opportunity to **switch or drop** that coverage within a short time period after selection. During the Annual Election Period from October 15 to December 7 each year, Medicare enrollees have the opportunity to **join, switch, or drop** their Medicare Advantage plan, effective the following January. During the Medicare Advantage Open Enrollment Period from January 1 – March 31 each year, Medicare enrollees have the opportunity to **switch or drop** their Medicare Advantage plan. During various Special Enrollment Periods, Medicare enrollees may have the opportunity to **join, switch, or drop** their Medicare Advantage plan outside of other enrollment periods under qualifying circumstances. For more information on enrollment periods, see CMS, [Joining a Plan](#).

In April 2024, the Centers for Medicare and Medicaid Services (CMS) issued a final rule for 2025 Medicare Advantage Plans and Prescription Drug Plans (“Part C/D Rule” or “Final Rule”). The Final Rule makes changes to Special Enrollment Periods for individuals who have Medicaid or the Low-Income Subsidy (LIS). For more information on these changes, see Justice in Aging’s brief [Upcoming Changes for Dually Enrolled Individuals: The Final 2025 Medicare Advantage Rule](#) and [webinar](#).

There are two changes to Medicare Special Enrollment Periods for Medicare enrollees with low income:

- New Monthly SEP
- New Integrated Care SEP

New Monthly SEP for Dually Eligible Individuals and Low-Income Subsidy Recipients

For people enrolled in a Medicare Advantage plan, the new “Monthly SEP” will allow individuals enrolled in Medicaid and/or who receive assistance through the Low-Income Subsidy to drop their Medicare Advantage plan, return to Original Medicare, and enroll in a new standalone Prescription Drug Plan on a monthly basis. For individuals already in Original Medicare, the Monthly SEP will also allow individuals to switch from one Prescription Drug Plan to another. The SEP cannot be used to enroll into another Medicare Advantage plan.

This Monthly SEP can be used to:

- Drop a Medicare Advantage plan with Part D prescription coverage (MAPD), join Original Medicare, and enroll in a standalone Part D Prescription Drug Plan.
- In Original Medicare, switch standalone Prescription Drug Plans.

Who can use this Monthly SEP?

- All dually eligible individuals—people with Medicare and Medicaid benefits—including individuals who are enrolled in Medicare Savings Programs but not full-scope Medicaid (also called partial-benefit dually eligible).
- All individuals enrolled in the Low-Income Subsidy (LIS), also called [Extra Help](#).

How many times can the Monthly SEP be used?

Once per month. Plan changes will be effective the first of the following month. For example, in February 2025, Maria is in Prescription Plan A and wishes to switch to Prescription Plan F. Maria can make the change in February and she will be disenrolled from Prescription Plan A and enrolled in Prescription Plan F effective March 1, 2025.

How is this option changing in 2025 compared to 2024?

Prior to January 1, 2025, individuals could make changes to their Medicare Advantage and Prescription Drug Plans on a quarterly basis. Starting in 2025, individuals will be able to make changes on a monthly basis. However, the monthly SEP cannot be used to join a Medicare Advantage plan. This SEP can only be used to disenroll from a Medicare Advantage plan with prescription drug coverage or to switch to standalone Prescription Drug Plans. There is an exception for full benefit dually eligible individuals who wish to join certain integrated D-SNPs. See below for more information on this new enrollment period.

The last time the Quarterly SEP could be used was in September 2024.

Integrated Care Special Enrollment Period

There is a subset of Medicare Advantage plans called a Dual Eligible Special Needs Plan (D-SNP). D-SNPs are plans available to individuals who are dually enrolled in Medicare and Medicaid.

Starting in 2025, the “Integrated Care SEP” will allow some dually eligible individuals to **join** or **switch** to specific types of D-SNPs on a monthly basis. This SEP is narrow. It only allows enrollment in a D-SNP that is considered to be: (1) Aligned **and** (2) Integrated.

What does it mean to enroll in an aligned plan?

The Integrated Care SEP only applies if the individual is enrolled, or in the process of enrolling, in the Medicaid plan that is aligned with the D-SNP. An **aligned** Medicaid Managed Care Organization (MCO) is described in the federal regulation as a Medicaid MCO that operates under a contract with the state and (a) the D-SNP; (b) the D-SNP's parent organization; or (c) another entity that is owned and controlled by the D-SNP's parent organization.

What does it mean to enroll in an integrated plan?

The SEP only applies if the D-SNP meets CMS's description of integrated—meaning that it is a Fully Integrated D-SNP (FIDE-SNP), Highly Integrated D-SNP (HIDE-SNP), and/or an Applicable Integrated Plan (AIP).

The Integrated Care SEP can be used to:

- Join an integrated D-SNP that is aligned with the individual's Medicaid plan
- Switch from another Medicare Advantage plan to an integrated D-SNP that is aligned with the individual's Medicaid plan

Who can use the Integrated Care SEP?

- Full dually eligible individuals with full-scope Medicaid and enrolled, or enrolling in, the D-SNP's aligned Medicaid MCO

Who cannot use the Integrated Care SEP?

- Partial benefit dually eligible individuals in Medicare Savings Programs, but not full scope Medicaid
- Low-income subsidy individuals without full scope Medicaid

How many times can the Integrated Care SEP be used?

Once per month. Plan changes will be effective the first of the following month.

What is new in 2025 compared to 2024?

Prior to January 1, 2025, full and partial benefit dually eligible individuals, and LIS enrollees, could change their Medicare Advantage enrollment quarterly. This quarterly option was eliminated and partial benefit and LIS recipients must wait until another enrollment period if they want to change their Medicare Advantage choice.

The creation of these two new SEPs do not impact the other existing [Special Enrollment Periods](#). People can continue to use other applicable Special Enrollment Periods.

Summary of New Special Enrollment Periods Effective January 2025

SPECIAL ENROLLMENT PERIOD	FULL DUALLY ELIGIBLE	PARTIAL DUALLY ELIGIBLE	LOW-INCOME SUBSIDY	CHANGE
Monthly SEP for Medicaid and LIS recipients	Yes	Yes	Yes	Available monthly rather than quarterly; cannot be used to enroll into or change MA plans
Integrated Care SEP	Yes	No	No	Limited to enrollment into integrated and aligned D-SNPs