The PSHBP IFR should confirm that PSHB plan carriers have the option to use CMS's group enrollment processes for both types of EGWPs, subject to the members' available opt out rights. See Medicare Manuals:

Medicare Managed Care Manual § 20.3.3 - Group Enrollment for Employer or Union Sponsored Plans

CMS is providing a process for group enrollment into an employer/union sponsored MA plan. CMS will allow an employer or union to enroll its retirees using a group enrollment process in which the beneficiaries participate through advance notification and that provides CMS with any information the 23 employer/union has on other insurance coverage for the purposes of coordination of benefits. MA organizations must adhere to the guidelines outlined in §40.1.6, as well as all other program requirements, in developing and implementing this process.

For OIRA's convenience, Section 40.1.6 is Attachment A hereto.

Medicare Part D EGWP Manual § 20.1.4 - Group Enrollment/Disenrollment
All PDP sponsors may group enroll/disenroll employer/union sponsored group health plan Part
D eligibles. This waiver applies to both EGWPs and individual PDPs offered to employer/union
group health plan Part D eligibles. The group enrollment/disenrollment procedures are outlined
in Pub. 100-18, chapter 3, sections 30.1.6 and 40.6.1

For OIRA's convenience the referenced sections of Pub 100-18 are Attachment B hereto.