

This calendar of key Medicare Advantage (MA) dates was developed to assist states in the development and implementation of integrated care programs for people dually eligible for Medicare and Medicaid.<sup>1</sup> The dates and information in this calendar are drawn from a more extensive calendar developed by the Centers for Medicare & Medicaid Services (CMS). That more extensive calendar, which CMS updates on an ongoing basis, is available at <u>https://hpms.cms.gov/app/ng/home/</u>. (To view or download the full calendar, scroll to the bottom of this webpage and click "Download the Calendar.")

| Date                         | Event   |
|------------------------------|---|
| January 1, 2025              | Medicare Advantage (MA) and Part D plan contract year starts; enrollment effective date for plan enrollments processed during the Medicare Annual Election Period (AEP) that took place between October 15 and December 7, 2024.  |
| January 1-<br>March 31, 2025 | Annual MA Open Enrollment Period, during which an individual who is already enrolled in an MA plan – including Dual Eligible Special Needs Plans (D-SNPs) and Medicare-Medicaid Plans (MMPs) – can switch to a different MA plan or disenroll from that MA plan to go back to original, fee-for-service Medicare (with or without a Part D prescription drug plan). |
| January 8, 2025              | CMS releases MA application for the next Calendar Year (CY) on the CMS website for new plan applications and organizations submitting service area expansions. On January 8, 2025, the application released will be for CY2026.   |
| January 8, 2025              | Model of Care (MOC) renewal submission period begins for D-SNPs, Institutional Special Needs<br>Plans (I-SNPs) and Chronic Condition Special Needs Plans (C-SNPs) with MOC approvals ending<br>December 31, 2025.   |
| January 10, 2025             | CMS releases CY2026 Advance Notice of Methodological Changes for MA capitation rates and Part C and Part D payment policies.  |
| January 17, 2025             | Final day for MA organizations to submit Notices of Intent to Apply (NOIAs) to CMS for CY2026. <sup>2</sup>   |
| February 3-24, 2025          | CY2024 Part C and D reporting requirements data submission (Enrollment/Disenrollment section has two data submission deadlines – August 2024 and February 2025).  |
| February 12, 2025            | Deadline for MA organization submission to CMS of CY2026 applications for new MA and Part D plans or service area expansions for existing plans.  |
| February 12, 2025            | MOC renewal submissions due for D-SNPs, I-SNPs and C-SNPs with MOC approvals ending December 31, 2025.  |
| February 21, 2025            | CMS releases instructional memo concerning updates to plan Parent Organization designations in the Health Plan Management System (HPMS).  |

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| Date                            | Event  |
|---------------------------------|--|
| February 24, 2025               | CMS notifies MA organizations with CY2025 D-SNP look-alike plans of their options for transitioning D-SNP look-alike enrollment.   |
| March 19, 2025                  | MA organizations and Part D plan sponsors must submit to CMS parent organization designation updates. <sup>3</sup>   |
| March 31, 2025                  | CY2024 Part C and D reporting requirements resubmission deadline.  |
| April 1-June 15, 2025           | Complete 2025 data validation of the CY2024 Part C and D reporting requirements.   |
| April 8, 2025                   | Deadline for MA organizations to submit full contract consolidation requests to CMS for CY2026.  |
| April-May 2025                  | CMS releases guidance for MA plans, including D-SNPs, regarding CY2025 renewal options, including crosswalks.  |
| No later than<br>April 7, 2025  | CMS releases final announcement of CY2026 MA capitation rates and Part C and D payment policies.   |
| April 9, 2025                   | CMS releases guidance for D-SNP look-alikes about CY2025 transitions and plan-submitted rollover (POVER) transactions. <sup>4</sup>  |
| April 11, 2025                  | CMS releases the Plan Creation Module, Plan Benefit Package (PBP) module, and Bid Pricing Tool software in HPMS. Organizations interested in offering an MA or Part D product in CY2026 must submit a PBP that accurately describes the coverage details and cost-sharing for all covered benefits. <sup>5</sup>   |
| May 2025                        | CMS releases CY2026 models for MA plan Annual Notice of Change (ANOC), Evidence of Coverage (EOC), Low Income Subsidy (LIS) rider, Part D Explanation of Benefits, formularies, transition notice, provider directory, and pharmacy directory.   |
| May 9, 2025                     | MA organizations with D-SNP look-alike plans submit CY2025 transition plans to CMS.  |
| May 23, 2025                    | CMS issues preliminary approvals/rejections for D-SNP lookalike transitions.   |
| May-July 2024                   | CMS releases state-specific Applicable Integrated Plan (AIP) D-SNP CY2026 model materials for certain states that choose to develop models with CMS. These models can include the ANOC, EOC (Member Handbook), Summary of Benefits, Formulary (List of Covered Drugs), Provider and Pharmacy Directory, and Member ID card, but the models released vary by state. |
| May 30, 2025                    | Submission period begins for plans to submit CY2026 marketing materials and communication materials, as applicable, to CMS for review via the HPMS Marketing Module.   |
| June 2025                       | CMS begins triennial provider network adequacy reviews for active MA plans, including D-SNPs.  |
| June 2025                       | MA organizations with D-SNP look-alike plans notify CMS of their transitions via HPMS.   |
| Early June-<br>Late August 2025 | Completion of CMS's CY2026 bid review and approval, to include pricing, PBPs, and formularies. Deadline for Medicare Advantage Organizations (MAOs)/Part D sponsors to submit attestations, contracts, initial actuarial certifications, and final actuarial certifications.   |

| Date                            | Event   |
|---------------------------------|---|
| June 2, 2025                    | Deadline for all MA and Part D plans to submit in HPMS (1) CY2026 bids and formulary files and (2) contract non-renewals and service area reductions for CY2026.  |
| June 3-4, 2025                  | Initial submission period for MA organizations to request crosswalk exceptions for CY2026.  |
| June 4, 2025                    | CMS releases CY2026 D-SNP module for D-SNPs to upload required State Medicaid Agency Contracts (SMACs), attestations, and contract matrices in HPMS.  |
| July 7, 2025                    | Deadline for all D-SNPs to upload required SMAC and Contract Matrices to HPMS.  |
| July 18-20, 2025                | Second submission period for Plans/Part D sponsors to request CY2026 crosswalk exceptions in HPMS.  |
| No Later than<br>July 29, 2025  | If, on or before this date, CMS issues a termination notice to an MA organization with an effective date of December 31, 2025, the MA organization must issue notices to the affected plan enrollees at least 90 days prior to the effective date of the termination. |
| Late July-<br>Early August 2025 | CMS releases the Part D national average monthly bid amount, the Medicare Part D base beneficiary premium, the Part D regional low-income premium subsidy amounts, the MA regional PPO benchmarks, and the de minimus amount.   |
| August-<br>September 2025       | Plan preview periods of Part C & D Star Ratings in HPMS. <sup>6</sup>   |
| Mid-August 2025                 | CMS sends approval letters to D-SNP look-alikes for transitions and POVER processes.  |
| August 21, 2025                 | CMS releases CY2026 contract materials in HPMS for MA and Part D plans (including D-SNPs).  |
| August 26, 2025                 | CMS notifies all D-SNPs of final determinations of integration status and sanctions based on CY2026 SMACs.  |
| August 31, 2025                 | CY2026 contract execution deadline.   |
| Mid-September, 2025             | All CY2026 MA and Prescription Drug Plan (PDP) contracts fully executed (signed) by both Part C/Part D plan sponsors and CMS.   |
| September 30, 2025              | Deadline for all MA organizations (including D-SNPs) to send the standardized ANOC to enrollees. Plans that have Part D cost sharing must submit the ANOC in HPMS prior to sending the LIS rider to enrollees.  |
| October 1, 2025                 | CMS releases CY2026 plan and drug benefit information in the Medicare Plan Finder (MPF) on Medicare.gov.  |
| October 1, 2025                 | MA plan and PDP marketing begins for CY2026. Organizations may market both CY2025 and CY2026 simultaneously but must clearly indicate which plan year is being discussed.   |
| October 2, 2025                 | Deadline by which enrollees of non-renewing PDPs, MA plans, MA-PD plans, MMPs, and cost-<br>based plans must receive final, personalized beneficiary non-renewal notification letters.  |

| Date                      | Event   |
|---------------------------|---|
| Early-Mid October<br>2025 | Plans submit transactions for approved crosswalk exceptions (in accordance with the guidance provided in the End-of-Year Enrollment and Payment Systems Processing Information HPMS memo). <sup>7</sup>                 |
| Early-Mid October<br>2025 | MA organizations of D-SNP look-alikes submit any approved POVER transactions.   |
| Early-Mid October<br>2025 | MA and Part D plan Star Ratings released on Medicare.gov.   |
| Mid-October 2025          | CMS releases CY2027 NOIA for MA organizations wishing to apply for new contracts or service area expansions.  |
| Mid-Late October<br>2025  | POVER transactions must be complete (if required) according to the End-of-Year Enrollment and Payment Systems Processing Information Memo.  |
| October 15, 2025          | Deadline for all MA organizations (including D-SNPs) to send the following documents to current enrollees: EOC (Member Handbook); abridged or comprehensive formularies; and provider and pharmacy directories.         |
| October 15, 2025          | Deadline for MA organizations that need to make corrections to CY2026 ANOCs to submit<br>ANOC errata to CMS in HPMS. MA organizations must send the corrected ANOCs to enrollees<br>immediately following CMS approval. |
| October 15, 2025          | Medicare Annual Election Period begins. Medicare beneficiaries can enroll in MA or Part D plans for CY2026.   |
| November 11, 2025         | CY2027 NOIA deadline to ensure access to HPMS for MA organizations applying for new contracts or service area expansions.   |
| November 15, 2025         | Deadline for MA organizations that need to make corrections to CY2026 EOCs to submit EOC errata to CMS in HPMS. MA organizations must send the corrected EOCs to enrollees immediately following CMS approval.          |
| December 7, 2025          | End of the Annual Election Period.  |

# ABOUT THE INTEGRATED CARE RESOURCE CENTER

The **Integrated Care Resource Center** is a national initiative of the Centers for Medicare & Medicaid Services Medicare-Medicaid Coordination Office to help states improve the quality and cost-effectiveness of care for dually eligible individuals. The state technical assistance activities provided by the Integrated Care Resource Center are coordinated by <u>Mathematica</u> and the <u>Center for Health Care Strategies</u>. For more information, visit <u>www.integratedcareresourcecenter.com</u>.

### **ENDNOTES**

<sup>1</sup> The dates in this calendar are for 2025 Medicare Advantage and Prescription Drug Plan activities. The exact dates of activities in future years are subject to change.

<sup>2</sup> CMS requires organizations planning to offer Medicare Part D or MA plans (including D-SNPs) to submit a Notice of Intent to Apply (NOIA) if they would like to offer a new plan or if they would like to expand the service area of an existing plan. To offer new plans or expand service areas for CY2026, organizations would have submitted NOIAs between November 11, 2024 and January 17, 2025.

<sup>3</sup> This is required of all MAOs but is especially important for D-SNPs that wish to be designated as a Fully Integrated Dual Eligible Special Needs Plan (FIDE SNP) or a Highly Integrated Dual Eligible Special Needs Plan (HIDE SNP) in 2026. To qualify as a FIDE SNP, a single legal entity must hold both a Medicare Advantage D-SNP contract with CMS and a Medicaid managed care organization contract with the state Medicaid agency. To qualify as a HIDE SNP, a MAO must demonstrate that Medicaid benefits are covered by either: (1) the same legal entity as the D-SNP; or (2) the same parent company as the D-SNP. For information about additional requirements for FIDE SNPs and HIDE SNPs, see ICRC's tip sheet on D-SNP definitions at <a href="https://integratedcareresourcecenter.com/resource/definitions-different-medicare-advantage-dual-eligible-special-needs-plan-d-snp-types-2023">https://integratedcareresourcecenter.com/resource/definitions-different-medicare-advantage-dual-eligible-special-needs-plan-d-snp-types-2023</a>.

<sup>4</sup> Last year's version of this notice is available in the HPMS memo archive file for the week of April 1-5, 2024: <u>https://www.cms.gov/about-cms/information-systems/hpms/hpms-memos-archive-weekly/hpms-memos-wk-1-april-1-5</u>.

<sup>5</sup> States interested in requiring plans to cover certain benefits, including supplemental benefits, will want to have discussions with plans well in advance of the June MA bid submission deadline.

<sup>6</sup> States can use the Part C and D measures in the MA star ratings to assess the quality and performance of MA plans operating in their state. Note that the star ratings are assigned at the contract level, not at the individual plan level. A single MA contract may include more than one type of SNP as well as non-SNP MA plans. For more information, see the ICRC tip sheet "How States Can Use Medicare Advantage Star Ratings to Assess D-SNP Quality and Performance." Available at: <a href="https://integratedcareresourcecenter.com/resource/how-states-can-use-medicare-advantage-star-ratings-assess-d-snp-quality-and-performance.">https://integratedcareresourcecenter.com/resource/how-states-can-use-medicare-advantage-star-ratings-assess-d-snp-quality-and-performance.</a>

<sup>7</sup> The 2024 End-of-Year Enrollment and Payment Systems Processing Information HPMS memo (labeled "2024 End-of-Year-Memo") is available in the HPMS memo archive file for the week of August 26-30, 2024: <u>https://www.cms.gov/about-</u> <u>cms/information-systems/hpms/hpms-memos-archive-weekly/hpms-memos-wk-5-august-26-30</u>.