

Helping states develop integrated programs for individuals who are dually eligible for Medicare and Medicaid

August 28, 2024

Integrated Care Updates

CMS Released New Model Materials for Applicable Integrated Plan D-SNPs in Select States

Each year, the Centers for Medicare & Medicaid Services (CMS) works with states to jointly develop state-specific and model materials for Applicable Integrated Plan (AIP) dual eligible special needs plans (D-SNPs) in states that choose to work with CMS on integrated model materials. This year, California, the District of Columbia, Hawaii, Idaho, Minnesota, New Jersey, New York, Tennessee, Virginia, and Wisconsin worked with CMS to develop model materials for CY2025. All guidance and model materials for each state can be found on the <u>CMS website</u>.

CMS Released Medicare-Medicaid Plan Marketing Model Materials and Guidance

Each year, CMS works with Financial Alignment Initiative demonstration states to jointly update state-specific marketing guidance and model materials for all Medicare-Medicaid Plans (MMPs). In June-early July, CMS released the CY2025 MMP English marketing materials and memoranda for states currently participating in capitated model Financial Alignment Initiative demonstrations, as well as the CY2025 MMP Spanish marketing model materials for Illinois, Massachusetts, New York (FIDA-IDD), Ohio, Rhode Island, South Carolina, and Texas. All guidance and model materials for each state can be found on the <u>CMS website</u>.

Requesting D-SNP Only Contracts for CY2026

The <u>CY 2023 Medicare Advantage and Part D final rule</u> codified a new pathway at 42 CFR 422.107(e) through which states can use their state Medicaid agency contracts (SMACs) to require that D-SNPs with exclusively aligned enrollment (EAE):

- a. Establish contracts that only include one or more D-SNPs within a state, and
- b. Integrate certain materials and notices for enrollees.

These "D-SNP-Only" contracts offer several benefits for states, including providing more transparency into the quality of care provided by the plan and the opportunity to create a Model of Care that is specific to the state.

In August 2022, CMS released a <u>memo</u> detailing the process by which states with EAE D-SNPs could request D-SNP-only contracts for upcoming plan years that begins with the state sending notification to CMS. To establish D-SNP-only contracts for the 2026 plan year, states should have notified CMS by August 15, 2024. The letter (a template for which is provided in Appendix A of the memo) must be addressed to the director of the Medicare-Medicaid Coordination Office (MMCO) and emailed to <u>MMCO_DSNPOperations@cms.hhs.gov</u>. If you wish to require D-SNPs in your state to operate within D-SNP only contracts in 2026, but you have not yet notified CMS, please contact MMCO at <u>MMCO_DSNPOperations@cms.hhs.gov</u> immediately.

MMCO FY 2023 Report to Congress

In late May, CMS provided Congressional leaders with the MMCO <u>FY 2023 Report to Congress</u>, as required by statute. This report provides an overview of CMS activities, accomplishments, and ongoing work to improve care for the more than 13 million individuals concurrently enrolled in both the Medicare and Medicaid programs. It also highlights the importance of health equity and reducing health disparities for dually eligible individuals, as dually eligible individuals have a higher prevalence of many health conditions and unmet social needs that can lead to poor health outcomes. The report includes the results of ICRC's annual integrated care data collection, which found that almost two million dually eligible individuals were enrolled in aligned plans in 2023.

August 2024 Enrollment in Medicare-Medicaid Plans, PACE Organizations, and Applicable Integrated Plans

August data on enrollment in MMPs, Program of All-Inclusive Care for the Elderly (PACE) organizations, and AIPs are now available on the ICRC website at: <u>Monthly Integrated Care Exclusively Aligned Enrollment Report: Dually Eligible</u> <u>Individuals Enrolled in MMPs, PACE, and AIPs</u>. Table 1 in this document shows total monthly enrollment for all integrated care plans with exclusively aligned enrollment (MMPs, PACE, and AIPs). Between July and August 2024, total enrollment in integrated care plans with EAE held steady at 1.3 million.

New Resources on the ICRC Website

- <u>Success Begins with Selection: Tips on Assessing Bidders' Past Performance for States Procuring</u> <u>Integrated Care Plans</u> (May 2024): This tip sheet is designed to help states that are planning procurements related to their integrated care programs for dually eligible individuals.
- <u>Working with Medicare: Coordination of Medicare and Medicaid Behavioral Health Benefits</u> (April 2024): This webinar provides an overview of Medicare and Medicaid behavioral health benefits (including mental health and substance use disorder benefits) for dually eligible individuals.
- <u>Tips for States on Working with Dual Eligible Special Needs Plans to Improve Coordination of Physical and</u> <u>Behavioral Health Services for Dually Eligible Individuals</u> (April 2024): This tip sheet details strategies states can use in their SMACs with D-SNPs to promote integration and coordination of behavioral health benefits among enrolled dually eligible individuals.
- <u>D-SNP-Only Contracts: Benefits and Key Steps for States</u> (March 2024): This webinar describes the opportunity for states to require D-SNPs that operate with exclusively aligned enrollment to establish contracts with CMS that only include one or more D-SNPs within a state and integrate certain materials for enrollees.

Key Upcoming Dates

- August-September 2024: Plan preview periods of Part C & D Star Ratings in the Health Plan Management System (HPMS).
- August 31, 2024: CY2025 contract execution deadline.
- Mid-September 2024: All CY2025 MA and PDP contracts fully executed (signed) by both Part C/Part D plan sponsors and CMS.
- September 30, 2024: Deadline for all MA organizations (including D-SNPs and MMPs) to send the standardized Annual Notice of Change (ANOC) to enrollees. Plans that have Part D cost sharing must also send the LIS rider to enrollees by this date (this is not applicable to MMPs and D-SNPs with no Part D cost sharing).

- Early October 2024: 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).
- Early-Mid October 2024: Medicare Advantage and Part D plan Star Ratings released on Medicare.gov.
- **Mid-October 2024:** CMS releases CY2026 Notice of Intent to Apply (NOIA) for MA organizations wishing to apply for new contracts or service area expansions.
- October 15, 2024: Deadline for all MA organizations (including D-SNPs and MMPs) to send the following
 documents or a notice informing them how to access these materials electronically to current enrollees: Evidence of
 Coverage (EOC); abridged or comprehensive formularies; and provider/pharmacy directories.

ABOUT THE INTEGRATED CARE RESOURCE CENTER

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

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