



A National Nonprofit Leadership Organization

SNP Alliance Medicare Medicaid Integration Work in 2019 “Year in Review”

Analysis and Development of Regulatory Documents: Summaries, analyses, shared learning and submission of SNP Alliance comments on various CMS rule or data collection proposals including:

- Final Rule Outline for Medicare Integration Standards
 - CMS 2020 Annual Notice of Change and Call Letter
 - Interoperability Rule
 - Direct Contracting Comment Letter
 - PRA (Paperwork Reduction Act) Solicitation for Dually Eligible Related Comments
 - PRA Solicitation on Comments for the 2021 SNP Application
 - PRA Solicitation for Comment on the DSNP-AIP Integrated Denial Notice
- (See SNPA 2019 Comment Letters on SNPA website: <http://www.snfalliance.org/news-reports/>)

Provision of Information Updates and Shared Learning Opportunities: Besides the comment letter development noted above and highlights of key reports such as those from MedPAC, MACPAC, ASPE, and other organizations, monthly MMI calls addressed key topics including:

- New CMS Guidance on Integrated G&A
- CMS Guidance on Flexible DSNP Supplemental benefits (in home meals)
- New CMS Guidance on CMS Integration Requirements
- Important ICRC Resources:
 - MLTSS Tool Kit
 - ICRC/SNP A/MMI discussion on involvement and education for states around new integration requirements
 - Pathways to Integrated Care
 - State Contracting for DSNPs for 2021
 - Tips for Improving Medicare Medicaid Integration
 - Insights on Data Sharing Requirements
 - SMAC Language Examples

Facilitation of State Communications: Increased involvement with state representatives including NAMD, ADvancing States, state leaders from PA, DC, VA, ID, OR, MN, NJ, TN, AZ and MA.

Clarification and interpretation of Integration Policies: Ongoing discussion, consultation and communication with CMS/MMCO to address a host of technical and policy issues such as:

- FIDE/HIDE SNP definitions, timelines and review processes,
- FIDE SNP carve out of behavioral health services
- Supplemental benefits without application of nonduplication
- Continued flexible benefits for DSNPs for home meal delivery
- Aligned enrollment definitions and applicability
- Use of IDNs
- The need for sharing of enrollment information between unaligned plans
- DSNP provision of coordination and assistance for access to Medicaid benefits between unaligned plans
- Policies around Look Alike plans, including the role of cost sharing
- Basic Criteria for DSNPs, HIDE SNPs and FIDE SNPs (see revised SNP A chart [here](#))

Collaboration: Ongoing consultation, information sharing and collaboration with important colleagues including NAMD, ADvancing States, CHCS, ICRC, ACAP, LTCQA, AHIP, PACE, BPC, Community Catalyst and others regarding state, MMP and DSNP integration issues and the future of integrated care.

Education and Shared Information: Meetings/interviews with key external entities to provide education, gather information, and/or collaborate regarding DSNP and MMP integration activities, challenges and concerns, including MACPAC, GAO, NCOA, ASPE and Arnold Ventures.

Increased MMI Resources: In 2019, the SNP Alliance was thrilled to be able to add Health Policy Associate Will Dede, MMP to our staff team to augment resources for MMI related issues.