



Special Needs — — Plan Alliance

Integration: State Contracting and Four-Pack Thoughts
04/15/2024

Speakers

- **Facilitator: Pamela Parker**, MPA, Medicare Medicaid Integration Consultant, SNP Alliance
- **Margaret Tatar**, JD Vice President, HMA
- **Allison Rizer**, Executive Vice President, ATI Advisory
- **Nick Johnson**, FSA, MAAA, Principal and Consulting Actuary, Milliman
- **Allison Taylor**, Former Medicaid Director - Indiana

CY23 RULE KICKED OFF DRAMATIC NEW D-SNP REQUIREMENTS; CY2025 RULE GOES EVEN FURTHER

CY2023 Rule

1 Required D-SNP Enrollee Advisory Committee

Similar to MMP and MLTSS, all D-SNPs must have one or more enrollee advisory committees in each state by 2023; CMS may prescribe additional requirements in the future.

2 SNPs Required to Screen for Social Needs

All SNPs must include standardized questions in the HRA addressing housing, food security, and transportation by 2024.

3 HIDE Service Area Alignment with Medicaid Service Area

A HIDE SNP's service area can be no larger than its Medicaid service area by 2025; CMS limits to HIDE (and FIDE via EAE*) for now but acknowledges it should apply to all D-SNPs.

4 Changing FIDE and HIDE Service "Floors"

FIDE SNPs must include LTSS *and* BH, *and* home health, DME, acute care, and cost-sharing as of 2025; HIDE SNPs must include LTSS *or* BH; states may add to CMS minimums.

5 Required Exclusively Aligned Enrollment* for FIDE

All FIDE SNPs must have exclusively aligned enrollment with no partial dual beneficiaries allowed, beginning in 2025.

6 State Mandates for D-SNP-Only Contracts

States with EAE can require D-SNPs to shift to a single contract ID; this has greatest implications for Star Ratings and networks, since both are assessed at the contract level.

CY2025 Rule

7 Limiting Enrollment in D-SNPs with Medicaid MCO Service Area Alignment

By 2027, D-SNPs with Medicaid MCO service area alignment will be limited to only enrolling FBDE individuals the D-SNP also serves through its affiliated MCO; all unaligned members must be disenrolled by 2030.

8 Limiting Organizations to a Single D-SNP

MAOs and Parent Organizations will be limited to one D-SNP (single plan package) in the service area overlapping with its Medicaid MCO. States can modify SMAC requirements to allow more than one plan package for a single Medicaid/Medicare organization.

9 Monthly Duals/LIS and Integrated SEP to Promote Integrated D-SNP Enrollment

Dual eligible individuals will have an ongoing SEP into D-SNPs that result in aligned enrollment, or into standalone Part D Plans; this replaces the current quarterly SEP.



THANK YOU

Visit us on our website at snpalliance.org!