

Special Needs ——— ————— Plan Alliance

April 2, 2025-

Today, the Centers for Medicare & Medicaid Services (CMS) released the Final Rule Calendar 2027 Medicare Advantage (Part C) program, Medicare Prescription Drug Benefit (Part D) program, Medicare Cost Plan Program, and Programs of All-Inclusive Care for the Elderly (PACE). The Special Needs Plan Alliance (SNP Alliance) appreciated the opportunity provided by CMS to submit comments on this proposal. The SNP Alliance has preliminarily reviewed the Final Rule and would like to highlight the following provisions:

Coverage Gap Discount Program

CMS is codifying the termination of the Coverage Gap Discount Program and all Coverage Gap Discount Program agreements as of January 1, 2025. CMS revised statutes § 423.2300 and § 423.2345 with clarifications and changes.

Manufacturer Discount Program

CMS is codifying the Manufacturer Discount Program by adding subpart AA to gather the new program requirements. Additionally, the new program requirements will change throughout §423. The Manufacturer Discount Program is the replacement for the Coverage Gap Discount Program.

Updates on Quality and Star Ratings

CMS finalized changes to the Star Ratings, which will move forward with the list of proposed eliminated measures—except the Diabetes Care – Eye Exam measure. That measure will remain in the Star Ratings. Thirteen (13) measure scores go away, including the SNP-Care Management measure. CMS has added two Star Ratings measures for 2029—Depression Screening and Follow-up Measure. Also, CMS will not be implementing the Health Equity Index reward and will continue to include the historical reward factor in the Star Ratings methodology.

Supplemental Benefits Being Finalized from the Contract Year 2026 Proposed Rule

CMS is codifying Contract Year 2026 Proposed Rule policies to strengthen the administration of Special Supplemental Benefits for the Chronically Ill (SSBCI). The new policies provide clarifying language:

- The posting of objective SSBCI eligibility requirements on the health plan's public-facing website
- The administration of supplemental benefits through debit cards to promote transparency, consistency, and integrity (does not include language on dollar amount marketing)

CMS has not provided any information about the RFI responses received. Additionally, CMS offered no feedback about the proposal to establish a special enrollment period for provider terminations in this Final Rule. CMS states they may re-engage this topic in future rulemaking.

Conclusion

In the coming weeks, the SNP Alliance will provide a more in-depth summary, including a discussion of the omitted proposed policies and the finalized policies in this Final Rule that impact beneficiaries with chronic, complex conditions.