



CENTERS FOR MEDICARE & MEDICAID SERVICES

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TO: Medicare Advantage Organizations

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SUBJECT: Updated Information on the Medicare Advantage (MA) Provider Directory Data for Use in Medicare Plan Finder (MPF) Initiative

On September 18, 2025, CMS published the *Medicare and Medicaid Programs; Contract Year 2026 Policy and Technical Changes to the Medicare Advantage Program, Medicare Prescription Drug Benefit Program, Medicare Cost Plan Program, and Programs of All-Inclusive Care for the Elderly (PACE)--Finalization of Format Provider Directories for Medicare Plan Finder Second Final Rule (CMS-4208-F2)*. This rule finalized requirements for MA organizations to submit provider directory data to CMS for publication on MPF.

This cover memo provides MA organizations with supplemental resources as they continue implementation of the provisions outlined in [CMS-4208-F2](#). These resources include:

1. Important technical clarifications for FHIR-based JSON provider directory submissions
2. Updated *Technical Implementation Guide for Supplying Medicare Advantage (MA) Provider Directory Data for Use in Medicare Plan Finder (MPF)*
3. Reminder about reporting provider directory URLs in the Health Plan Management System (HPMS)
4. Frequently asked questions about the MPF MA provider directory initiative
5. Quick reference guides on preparing MA provider directory data for inclusion in MPF

Important Technical Clarifications for FHIR-Based JSON Submissions

The original technical guide indicated that CMS would dynamically query each FHIR endpoint to extract the MA provider directory data in bulk. As evidenced in the February 18, 2026 version of

the guide, CMS has shifted course on how to retrieve these data when supplied in the FHIR-based JSON format.

To support MPF using dynamic queries, CMS would need to access MA organization servers for over 700 contracts daily to extract each organization's entire provider directory. The expected total record count would be considerable when accounting for the individual providers and facilities and their roles and locations that are connected to the over 5,500 unique MA plans.

When considering the substantial expected record count, the number of requests that would be necessary to execute these dynamic extractions, the potential impact on plan systems, and cost concerns raised by some plans using third-party services, CMS determined that a different solution would be needed for the collection year.

CMS consulted with FHIR experts in the interoperability space to identify alternatives that would satisfy the unique requirements of the MPF use case. The analysis determined that the **FHIR bulk publish operation** is the most viable option for supporting MPF. This new specification introduces the capability of exporting and hosting files to facilitate the efficient transfer of entire datasets within FHIR.

Given that the FHIR bulk publish operation is in a draft status, CMS has plans to engage with the appropriate governing bodies (HL7 and the Argonaut FHIR Accelerator) on the prospect of finalizing this operation as a standard.

For Contract Year (CY) 2027, CMS has developed an interim solution for MPF that anticipates the capabilities that will become available through the FHIR bulk publish operation. The interim solution, which is presented in CMS' revised technical guide, outlines the steps that must be taken by MA organizations seeking to use the FHIR-based JSON option:

1. Ensure the FHIR-based JSON provider directory complies with the MPF-specific requirements documented in CMS' technical guide.
2. Export the FHIR-based JSON provider directory resources and prepare the JSON files for CMS consumption.
3. Create an index file that lists all constituent FHIR-based JSON file URLs that make up the complete exported directory.
4. Post the index file for each unique CMS contract number/contract year on a dedicated, publicly accessible URL in HPMS.

2026 CMS HL7 FHIR Connectathon

CMS welcomes participation from interested MA organizations in the 2026 CMS HL7 FHIR Connectathon, which is scheduled for July 14-16, 2026. **Registration is now open.** More information on this event is available in the enclosed handout.

The Connectathon will be a prime opportunity to collaborate with FHIR experts to test and inquire about the FHIR bulk publish operation for the MPF use case. The following Confluence page provides information on the test scenarios that will be used by participants to crawl PDex Plan-Net data, including the bulk publish specification:

<https://confluence.hl7.org/spaces/FHIR/pages/453908193/2026+-+07+Da+Vinci+PDex+Plan-Net>

Register [here](#) for the free CMS & HL7 FHIR Connectathon.

Updated Technical Guide

CMS has included an updated *Technical Implementation Guide for Supplying Medicare Advantage (MA) Provider Directory Data for Use in Medicare Plan Finder (MPF)* in this mailing. Updates include, but are not limited to, the following:

- A reminder about MA organization compliance with the Interoperability and Patient Access final rule.
- Revised technical instructions for preparing machine-readable JSON and FHIR-based JSON submissions for MPF, with a focus on the [interim technical solution discussed above](#).
- Some sections and appendices have been reordered for clarity.
- API endpoint references have been updated to URLs to reflect the [interim technical solution discussed above](#).

Reminder: Reporting Provider Directory URLs in HPMS

CMS **strongly encourages** MA organizations to report their MPF provider directory URLs in the HPMS MPF Provider Directory module as soon as possible. When constructing and recording these URLs, keep the following guidelines in mind:

- Provide a unique URL for each contract number and contract year.
- Indicate whether the URL points to machine-readable JSON or FHIR-based JSON files.

Most importantly, remember that CMS is now seeking the dedicated, publicly accessible URL on which the index file is posted for each unique CMS contract number/contract year, not an API endpoint.

Frequently Asked Questions

CMS has also included a list of frequently asked questions submitted by MA organizations and third-party vendors and the corresponding responses.

Quick Reference Guides

Lastly, CMS has provided two quick reference guides in an infographic format:

- How to Prepare Your FHIR-Based JSON Submission
- How to Prepare Your Machine-Readable JSON Submission

Questions

For technical support related to HPMS, please contact the HPMS Help Desk at 1-800-220-2028 or hpms@cms.hhs.gov.

For technical assistance with the machine-readable JSON and FHIR-based JSON files and validation results, please contact support@cms-mapnet.zendesk.com.