

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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MEDICARE-MEDICAID COORDINATION OFFICE

DATE: May 15, 2026

TO: All Current and Prospective Medicare Advantage Organizations offering Dual Special Needs Plans in Contract Year 2027

FROM: Nishamarie S. Mills
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SUBJECT: New Dual Eligible Special Needs Plan Crosswalk Exception related to 42 CFR § 422.514(h)

On May 1, 2026, CMS issued an email blast via the Health Plan Management System (HPMS) to all Medicare Advantage (MA) organizations announcing the timeframes and general operational guidance for the submission of crosswalk exceptions. MA organizations can enter allowable CY 2027 crosswalk exceptions beginning Tuesday, June 2, 2026, at 3:00 a.m. Eastern Time (ET) through Wednesday, June 3, 2026, at 5:00 p.m. ET.

CMS also provides a full explanation of the crosswalk exception process in Chapter 5 of the Bid Submission User Manual. Once released, the Manual can be found at the following HPMS path: HPMS>Plan Bids>Bid Submission>CY2027>View Documentation.

In advance of the release of Chapter 5 of the Bid Submission User Manual, this memo provides instructions and guidance for a new crosswalk exception for CY 2027 that is specific to MA organizations offering dual eligible special needs plans (D-SNPs) complying with 42 CFR § 422.514(h).

Beginning in CY 2027, where one or more MA organizations that share a parent organization seek to consolidate D-SNPs in the same service area down to a single D-SNP under one MA-PD contract to comply with 42 CFR § 422.514(h), CMS permits enrollees to be moved between different contracts.

MA organizations utilizing this exception request should ensure the following:

- Where compliance with 42 CFR § 422.514(h) has the MA organization crosswalk categories of dually eligible individuals (i.e., full-benefit or partial-benefit or nursing facility level of care (NFLOC) and non-NFLOC), indicate the specific categories in the comment section.

- Ensure that when the MA organization submits the State Medicaid agency contract for annual review in July, the eligibility categories match the appropriate D-SNP plan benefit packages (PBPs).
- From the drop-down menu, select the applicable crosswalk exception reason – D-SNP Enrollment Consolidation.
- Where populations are being moved across contracts (or PBPs within a contract) that the MA organization articulates in the comments section which populations (eligibility categories) are being crosswalked to which PBP.

Note: Effective CY 2027, MA organizations will be able to indicate the intent to submit a plan-initiated (POVER) enrollment transaction for the upcoming year. The intent to submit POVER requests can be submitted using the Crosswalk Exceptions functionality in HPMS (Plan Bids > Bid Submission > CY 2027 > Upload > Exceptions Plan Crosswalk). On the Complete Exceptions Plan Crosswalk screen, the organization may select the “Plan to submit POVER” checkbox. Note: This checkbox is optional and will be used only for informational purposes by CMS. Selecting the checkbox does not obligate the organization to submit a POVER enrollment transaction. Additional information about the informational POVER checkbox will be provided in Chapter 5 of the Bid Submission User Manual.

Please submit any D-SNP specific crosswalk questions to MMCO_DSNPOperations@cms.hhs.gov.