



MEDICARE DRUG & HEALTH PLAN CONTRACT ADMINISTRATION GROUP

DATE: December 30, 2025

TO: Medicare Advantage Organizations, Network-based Private Fee-For Service Plans, Section 1876 Cost Plans, Initial and Service Area Expansion Applicants

SUBJECT: Contract Year 2027 Medicare Advantage Network Adequacy Updates

CMS releases updated Medicare Advantage (MA) network adequacy operational guidance for Contract Year (CY) 2027 applications.

All applicants must submit their provider networks in the Network Management Module (NMM) in the Health Plan Management System (HPMS) as part of the CY 2027 MA application process. CMS encourages applicants to prepare and submit Health Service Delivery (HSD) tables in advance of the application deadline. This advanced preparation helps applicants determine whether they have upload-related errors they need to correct prior to hitting “final submit” on their application(s) and whether they need to prepare Exception Requests (ERs) in response to any known network deficiencies.

Operational updates to Network Exception Request submissions during the MA application

Under § 42 CFR 422.116(f)(1), applicants may request an exception to the network adequacy criteria. Facility Based I-SNP applicants must select the “Facility Based I-SNP” exception type from the drop-down on the Exception Request page in the NMM to meet the criteria for an approvable Facility Based I-SNP Exception Request under 42 CFR 422.116(f)(1)(ii). Refer to the section “How to Request Exceptions” in the Health Plan Management System (HPMS) NMM Plan User Guide found in the HPMS Network Management Module under Documentation > Guidance, for additional instructions.

Initial Submission (UPDATED)

New for CY 2027: Applicants may submit ERs after receiving the Automated Criteria Check network adequacy results for their initial submission. Applicants will receive ER upload instructions from HPMS when the submission gates open.

Response to Deficiency Notice and Notice of Intent to Deny

When responding to CMS issued Deficiency Notices and Notices of Intent to Deny, applicants may resubmit their complete HSD tables, and/or revised denied Exception Requests. Applicants may include new, additional providers, including providers and facilities with whom the applicant has secured valid LOIs on their HSD tables. Applicants must notify CMS about their use of an LOI(s), each time the applicant responds to any noted deficiency that they are seeking to address with an LOI(s).

All applicants must follow the process outlined above regarding the submission network adequacy materials during the application.

Training Updates and Available Reference Materials

The 2026 Reference Files are now available under the “Downloads” tab, located at:
<https://www.cms.gov/medicare/health-drug-plans/medicare-advantage-application>.

Questions regarding these updates or content related to network adequacy may be submitted to the [Medicare Advantage Operations Mailbox](#). Select “Network Adequacy” from the category drop-down menu on the question submission page.

CMS is releasing training for applicants on the CY 2027 Medicare Advantage Plan (including Employer/Union Only Group Waiver and Special Needs Plans) application process, including network adequacy requirements on the [CMSHHSgov YouTube](#) website.

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