



MEDICARE-MEDICAID COORDINATION OFFICE

DATE: September 13, 2022
TO: Applicable Integrated Plans
FROM: Kimberly Spalding Bush, Director
Program Alignment Group, Medicare-Medicaid Coordination Office
SUBJECT: 60-day Comment Period for Integrated Annual Notice of Changes and Evidence of Coverage for Dual Eligible Special Needs Plans in Certain States

Purpose

The Centers for Medicare & Medicaid Services (CMS) is announcing an opportunity for dual eligible special needs plans (D-SNPs) that are applicable integrated plans (AIPs) (as defined at 42 CFR 422.561)¹, and other partners to comment on the proposed Integrated Annual Notice of Changes (ANOC) and Evidence of Coverage (EOC). Comments are due by November 7, 2022.

Background

As required by §§ 422.2267(e) and 423.2267(e), all Medicare Advantage and Part D plans must provide the EOC to current and prospective enrollees as well as an ANOC to current enrollees. Per §§ 422.2265(c) and 423.2265(c) plans must also post the ANOC and EOC to their websites.

As noted in our [May 2022 final rule](#),² for enrollees whose Medicare and Medicaid benefits are covered under AIPs, there are advantages to receiving communications that integrate all of the required Medicare and Medicaid content including providing a more seamless description of health care coverage and enhancing the understanding of, and satisfaction with, the coverage both programs provide.

Through the Paperwork Reduction Act (PRA) clearance process, we are creating versions of the CY 2024 ANOC and EOC for AIPs in states that require such plans to issue integrated ANOC and EOC materials. These integrated versions will reflect revisions to the existing D-SNP ANOC and EOC templates³ to include integrated information on Medicaid benefits that state Medicaid agencies can customize.

¹ As defined at 42 CFR 422.561, an applicable integrated plan is a D-SNP with exclusively aligned enrollment, such that all D-SNP enrollees also receive Medicaid benefits under the same parent organization.

² See the discussion on Integrated Member Material at 87 CFR 27768.

³ Available at <https://www.cms.gov/Medicare/Health-Plans/ManagedCareMarketing/MarketngModelsStandardDocumentsandEducationalMaterial>.

We request comment from D-SNPs and other partners on the readability of these documents for enrollees and ease of integrating Medicaid information for states and AIPs. Once we make updates based on these comments, we will post the documents for an additional 30-day comment period along with the Spanish and Chinese language versions of the integrated ANOC and EOC.

How to Comment

The 60-day notice for the proposed ANOC and EOC for Applicable Integrated Plans (CMS-10824; OMB control number: 0938-TDB) is published at:

<https://www.federalregister.gov/documents/2022/09/07/2022-19316/agency-information-collection-activities-proposed-collection-comment-request>.

Please review the draft ANOC, EOC, and PRA-related forms available at

<https://www.cms.gov/Regulations-and-Guidance/Legislation/PaperworkReductionActof1995/PRA-Listing.html> under CMS Form Number CMS-10824.

You may make edits and comments directly in the Word document versions of the ANOC and EOC using the track changes and comment functions. When you have finished your review, you will be able to submit the edited Word document as an upload by following the instructions to submit a formal comment on <https://www.federalregister.gov/documents/2022/09/07/2022-19316/agency-information-collection-activities-proposed-collection-comment-request>.

Please note we will accept comments in any format submitted electronically or by mail per the instructions in the notice by November 7, 2022.