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DATE: May 12, 2011

TO: All Current and Prospective Medicare Advantage, Prescription Drug Plan, Cost, and PACE Organizations

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SUBJECT: Process for Requesting an HPMS Crosswalk Exception for Contract Year (CY) 2012

This memorandum provides guidance on the HPMS crosswalk exceptions process that is available to Medicare Advantage Organizations (MAO) and Prescription Drug Plan (PDP) sponsors for CY 2012.

As outlined in the April 4, 2011 Announcement of the Calendar Year (CY) 2012 Medicare Advantage Capitation Rates and Medicare Advantage and Part D Payment Policies and Final Call Letter, organizations are permitted to request the following crosswalk exceptions. For additional information, please refer to Appendices A-1, A-2, B-1, and B-2 in the Final Call Letter:

- 1) Non-Network and Partial Network PFFS Plans Transitioning to Partial or Full Network PFFS Plans (Scenarios 7a,7b, 8a, 8b, 9a, and 9a in Appendices A-1 and A-2 of the Final Call Letter)
- 2) MAO with a Renewing D-SNP that Also Creates a New Medicaid Subset D-SNP and Transitions Eligible Enrollees into the New Medicaid Subset D-SNP (Scenario 11 in Appendices A-1 and A-2 of the Final Call Letter)
- 3) Renewing D-SNP in a Multi-State Service Area with a SAR to Accommodate State Contracting Efforts in Portions of that Service Area (Scenario 12 in Appendices A-1 and A-2 of the Final Call Letter)
- 4) D-SNP that Transitions Current Enrollees to a New D-SNP with a Different Designation and Less Restrictive Eligibility Requirements (Scenario 13a in Appendices A-1 and A-2 of the Final Call Letter)
- 5) D-SNP that Transitions Some Current Enrollees to a New D-SNP with a Different Designation and More Restrictive Eligibility Requirements Consistent with the New D-SNP's State Contract (Scenario 13b in Appendices A-1 and A-2 of the Final Call Letter)
- 6) Consolidated Plans under a Parent Organization (Scenario 6 in Appendices B-1 and B-2 of the Final Call Letter)

Organizations will be able to submit crosswalk exception requests through HPMS from **Monday, June 13, 2011 through Friday June 17, 2011 at 5:00 p.m. EDT.** CMS will not accept any crosswalk exception requests submitted by any other means than HPMS.

To access the crosswalk exceptions functionality, HPMS users should use the following HPMS navigation: HPMS > Plan Bids > Bid Submission > Contract Year 2012 > Upload > Plan Crosswalk Exceptions.

Users will be provided a page that looks similar to the standard HPMS plan crosswalk functionality. While organizations will be able to indicate the CY 2011 to CY 2012 crosswalk relationships, they will also have expanded functionality to associate one 2011 plan to one or more 2012 plans and to request crosswalks across contracts. Each crosswalk exception request must be tied to one of the permitted crosswalk exceptions, as outlined above and in the Final Call Letter. If a renewal or non-renewal scenario is not listed above or outlined in the Final Call Letter, it is not a permissible renewal option.

Note: Organizations must **NOT** submit crosswalks via the exceptions process if the crosswalk was already submitted through the standard plan crosswalk process during bid submission.

After the crosswalk exception request deadline, CMS will review the submitted requests and determine on an individual basis if the request is permissible. Organizations that submit one or more crosswalk exception requests will be notified once the crosswalks have been reviewed and processed in HPMS. Organizations will then be instructed to view the HPMS Plan Crosswalk Report, which is located at: HPMS > Contract Management > Contract Reports > 2012 > Plan Crosswalk Report.

If the requested crosswalk exception is approved, users will receive one of two possible approval types for each exception request.

1. CMS completes the plan crosswalk on behalf of the organization
 - Where possible, CMS will effectuate the crosswalk in the HPMS on behalf of an organization. Organizations that receive this type of crosswalk approval will see that their requested crosswalk exception is included in the plan crosswalk report, with the date that the crosswalk was processed by CMS.
2. Permitted to submit MARx enrollment transactions
 - If it is not possible for CMS to effectuate the crosswalk on behalf of an organization, the organization will be permitted to submit MARx enrollment transactions to move the impacted beneficiaries to the appropriate plan. Plans that have received approval to submit MARx enrollment transactions will see a new table at the bottom of the plan crosswalk report, identifying which plans can submit MARx transactions to move their beneficiaries to the appropriate CY 2012 plan.

For questions regarding this memo, please send an e-mail to HPMSCrosswalkexceptions@cms.hhs.gov.

For HPMS technical issues, please contact the HPMS helpdesk at 1-800-220-2028 or hpms@cms.hhs.gov.