



New Medicare-Medicaid Integration Policies for D-SNPs for 2021

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Learning Goals

- Summarize D-SNP Medicare-Medicaid integration requirements
- Summarize D-SNP changes to the MA-PD application
- Summarize new D-SNP unified appeals and grievance procedures
- Provide resources for more information
- Answer questions



D-SNP Medicare-Medicaid Integration

- The Bipartisan Budget Act of 2018 requires a minimum level of Medicare-Medicaid integration for all D-SNPs beginning CY 2021
- CMS-4185-F requires that D-SNPs meet at least one of the following:
 - Be a FIDE SNP
 - Be a HIDE SNP
 - Notify state/designee(s) of hospital & SNF inpatient admissions for some high-risk enrollees



FIDE SNP vs HIDE SNP

	FIDE SNP	HIDE SNP
Must provide coverage of applicable Medicaid benefits through the same entity that CMS contracts with to operate as a MA plan	Yes	No , contract may be with (1) the MA organization offering the D-SNP; (2) the MA organization's parent organization; or (3) another entity owned and controlled by the MA organization's parent organization.
May provide coverage of Medicaid services through a PIHP or a PAHP	No	Yes
Must have a contract with the state Medicaid agency that meets the requirements of a managed care organization	Yes	No



FIDE SNP vs HIDE SNP (cont.)

	FIDE SNP	HIDE SNP
Must provide coverage of long-term services and supports (LTSS).	Yes	No , if it otherwise covers behavioral health services.
Must provide coverage of behavioral health services.	No , complete carve-out of behavioral health coverage by the state Medicaid agency is permitted.	No , if it covers LTSS
Must provide coverage of 180 days (minimum) of nursing facility services during the plan year.	Yes	No



State Medicaid Agency Notification Requirements

- Effective for plan year 2021:
 - D-SNPs that are not HIDE/FIDE SNPs must include a new notification requirement in State Medicaid Agency Contracts (SMACs)
- Purpose:
 - To improve coordination between the D-SNPs and the state Medicaid agency during transitions of care
- Approach:
 - Flexible. States can use existing systems and/or Health Information Exchanges (HIE)



Intermediate Sanctions (§ 422.752)

- CMS will impose intermediate sanctions:
 - During plan years 2021 through 2025
 - On MA organizations with a D-SNP contract that do not meet one of the three integration criteria in D-SNP definition (§422.2)
- Sanctions continue until integration criteria are met
- CMS will have a process for sanctioned D-SNPs to come off sanction through the CAP process once integration criteria are met



D-SNP Application Process

- The draft MA-PD application was released on September 12, 2019. Comments are due to www.regulations.gov by November 12, 2019
- For CY 2021, all D-SNPs must submit the applicable D-SNP attestations and required uploads and either:
 - A new SMAC; or
 - An evergreen SMAC with contract amendment
- Organizations must indicate in attestations whether they:
 - Meet FIDE SNP requirements; or
 - Meet HIDE SNP requirements, or
 - Notify state/designee(s) of hospital & SNF inpatient admissions for some high-risk enrollees



New SMAC Requirements

- For a D-SNP that is not a FIDE SNP or HIDE SNP, the plan must describe:
 - Process for notification, or arranging for another entity or entities to notify, the state (and/or its designee(s)) of hospital and SNF admissions for a group of high risk full-benefit dually eligible individuals identified by the state
 - Timeframe and methods by which notice provided
 - Group of high-risk full-benefit individuals for whom notice provided
- For a D-SNP that is an applicable integrated plan, the use of the unified appeals and grievance procedures



Key Dates for D-SNPs

Month/Year	Activity
Fall 2019	<ul style="list-style-type: none"> States and D-SNPs begin drafting changes to ensure SMACs meet new requirements States plan for any needed MCO contract changes
Winter 2020	<ul style="list-style-type: none"> States and D-SNPs identify and create and new policies and procedures needed in response to contract changes
January 2020	<ul style="list-style-type: none"> CMS releases Contract Year 2021 MA (SNP) applications
February 2020	<ul style="list-style-type: none"> SNP applications (including SNP service area expansion applications) due to CMS
Spring 2020	<ul style="list-style-type: none"> States and D-SNPs finalize SMACs



Key Dates for D-SNPs (cont.)

Month/Year	Activity
June 2020	<ul style="list-style-type: none"> • D-SNPs not renewing MA contracts notify CMS • Bid submission deadline
July 2020	<ul style="list-style-type: none"> • D-SNPs submit SMAC and related documents to CMS by Monday, July 6, 2020
July/August 2020	<ul style="list-style-type: none"> • D-SNPs work with states and CMS to address deficiencies in SMACs



Key Dates for D-SNPs (cont.)

Month/Year	Activity
Summer 2020 - Fall 2020	<ul style="list-style-type: none"> States and D-SNPs finalize policies and procedures for CY 2021
August/September 2020	<ul style="list-style-type: none"> CMS issues SMAC status review letters and, as applicable, intermediate sanction letters D-SNPs send Annual Notice of Change and Evidence of Coverage (including information about any changes to grievances and appeals procedures for applicable integrated plans) to current enrollees
January 1, 2021	<ul style="list-style-type: none"> Effective date for most April 2019 final rule provisions



Polling Question

When is the 2021 executed State Medicaid Agency Contract due to CMS?

- A. January 2020
- B. January 2021
- C. July 2020
- D. June 2020



Integrated Appeals and Grievances

Summary of Key Requirements for Integrated Appeals and Grievances

- Applies to Applicable Integrated Plans (D-SNPs with exclusively aligned enrollment)
 - D-SNPs that, through agreement with the State, limit membership to individuals enrolled in both a D-SNP and an affiliated Medicaid MCO
- Integration of Medicare and Medicaid requirements
- Allows for state flexibilities - must be in SMAC
- Continuation of benefits while the Level 1 appeal is pending



Integrated Appeals and Grievances (cont.)

Opportunities for Public Comment:

- Integrated Denial Notice (through the PRA process)
- Other integrated notices
- Audit protocol
- Unified appeals and grievance procedures guidance



Polling Question

Does your organization have any applicable integrated plans?

A. Yes

B. No



D-SNP Action Steps

- SMACs must be submitted to CMS in just 8 months!
- D-SNPs should start planning now to:
 - Work with their respective states
 - Finalize SMACs by July 6, 2020
 - If applicable integrated plans, begin planning for operational changes necessary for unified appeals and grievance procedures



Integrated Care Resource Center Resources

- Update on State Contracting with D-SNPs: The Basics and Meeting New Federal Requirements for 2021

<http://bit.ly/UpdatesonStateContracting>

- Promoting Information Sharing by Dual Eligible Special Needs Plans to Improve Care Transitions: State Options and Considerations

<http://bit.ly/StateOptionsandConsiderations>



Integrated Care Resource Center Resources (cont.)

- Information Sharing to Improve Care Coordination for High-Risk Dual Eligible Special Needs Plans Enrollees: Key Questions for State Implementation
<http://bit.ly/KeyQuestionsforStateImplementation>
- ICRC will disseminate sample contract language



Resources for More Information

- MMCO D-SNP web page: http://bit.ly/MMCO_D-SNP
 - CMS-4185-F Final Rule
 - HPMS memo
 - IDN PRA Notice
- Application PRA Notice: http://bit.ly/Application_PRA_Notice
- Questions: MMCO_DSNPOperations@cms.hhs.gov