



MEDICARE DRUG & HEALTH PLAN CONTRACT ADMINISTRATION GROUP

DATE: November 28, 2018

TO: Medicare Advantage Special Needs Plans

FROM: Kathryn A. Coleman, Director

SUBJECT: Changes to the Model of Care Submission Requirements for Special Needs Plans

The purpose of this memorandum is to notify Medicare Advantage Special Needs Plans (SNP) of the recent changes to the Model of Care (MOC) submission requirements, as a result of passage of the Bipartisan Budget Act of 2018 (Pub. L. 115-123).

Specifically, section 1859(f)(5)(B)(iv) of the Social Security Act (the Act), as amended, requires that Chronic Condition Special Needs Plans (C-SNPs) submit a MOC annually for evaluation and approval by the National Committee for Quality Assurance (NCQA) beginning in contract year (CY) 2020 and subsequent years.

Therefore, beginning with CY 2020, C-SNPs may only receive MOCs approvals for a period of one year. All new and current C-SNPs, regardless of whether their MOC received a one, two, or three year approval, are required to submit a MOC in 2019 for review and approval for CY 2020 implementation. This requirement does not apply to Dual (D-SNPs) or Institutional (I-SNPs) SNP types.

Additionally, section 1859(f)(5)(B)(v) of the Act, as amended, requires a minimum scoring benchmark for each element of the C-SNP's MOC and permits approval of a MOC only if each element of the MOC meets the applicable minimum benchmark. CMS will pursue rulemaking to adopt the new scoring benchmarks beginning 2021 and, given that population needs are similar across all SNP types, will also apply the new scoring benchmarks to D-SNPs and I-SNPs.

Note that the MOC elements and factors for all SNP types will not change for the CY 2020 submissions and NCQA will continue to review MOCs for all SNP types on an element by element basis until CMS can establish new scoring guidelines through rulemaking.

More information regarding MOC submission training will be announced soon.

If you have any questions, please submit an inquiry to the Medicare Part C Policy Mailbox, located at: <https://dpap.lmi.org>.