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DATE: May 15, 2019

TO: All Current and Prospective Medicare Advantage Organizations,
Prescription Drug Plan, Medicare-Medicaid Plans, and Section 1876
Cost Plans

FROM: Kathryn A. Coleman
Director, Medicare Drug & Health Plan Contract Administration Group

Amy Larrick Chavez-Valdez
Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Process for Requesting an HPMS Crosswalk Exception for Contract
Year (CY) 2020

This memorandum provides guidance on the Health Plan Management System (HPMS) crosswalk exceptions process that is available to Medicare Advantage organizations (MAO) and Prescription Drug Plan (PDP) sponsors, Medicare-Medicaid Plans, and Section 1876 cost plans for CY 2020.

Organizations are permitted to request the following crosswalk exceptions:

- 1) Non-network and partial network PFFS plan that is transitioning to partial or full network PFFS plan (section 160 of Chapter 16a of the Medicare Managed Care Manual).
- 2) Renewing D-SNP that is transitioning eligible enrollees into another D-SNP (section 50.3 of Chapter 16b of the Medicare Managed Care Manual).
- 3) Renewing D-SNP in a multi-state service area that is reducing its service area to accommodate a state contract in a part of the service area (section 50.3 of Chapter 16b of the Medicare Managed Care Manual).
- 4) Renewing C-SNP with a CMS-approved grouping that is transitioning eligible enrollees into another C-SNP with one of the chronic conditions from that grouping (section 50.3 of Chapter 16b of the Medicare Managed Care Manual).
- 5) Consolidated plans under a parent organization (scenario 6 for PDPs found at <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/Downloads/PDP-Renewal-and-Non-Renewal-Guidance.pdf> and in the attached Part C Crosswalk Guidance for coordinated care plans).

- 6) Non-segmented plan that is crosswalking enrollees to a segmented plan and vice versa (attached Part C Crosswalk Guidance).
- 7) Section 1876 cost contract terminating a current year plan with an optional supplemental benefit that is crosswalking enrollees to another cost plan PBP for the following contract year.

NOTE: Beginning with CY 2020, Section 1876 cost plans may no longer deem enrollees into an MA plan under the crosswalk exceptions process. Contract Year 2019 was the last year for deeming section 1876 cost enrollees into one of the organization's MA plans under MACRA.

Plan crosswalk requests resulting from a change in ownership must be submitted prior to the bid submission deadline. Requests submitted after the bid deadline will not be accepted and the acquiring plan sponsor must maintain each plan for the upcoming contract year in accordance with the bid that was submitted.

Crosswalk exception requests may only be submitted in HPMS from **Tuesday, June 4, 2019 through Wednesday, June 5, 2019 at 5:00 p.m. ET.** A second round of crosswalk exceptions will be accepted in July and additional guidance regarding the second round will be released later this year.

Note: Organizations should **NOT** submit crosswalk exception requests if they were already submitted through the standard plan crosswalk process at bid submission.

To access the crosswalk exceptions functionality, HPMS users should use the following HPMS navigation: HPMS > Plan Bids > Bid Submission > Contract Year 2020 > Upload > Plan Crosswalk Exceptions.

Crosswalk exception requests must comply with CMS guidance as outlined in the PDP Renewal/Non-Renewal Guidance for PDPs (link provided above), the Medicare Managed Care Manual, or the attached Part C Crosswalk Guidance. If a renewal or non-renewal scenario is not described in the sources listed above or outlined in the Final Call Letter, it is not a permissible renewal option.

After the crosswalk exception request deadline, CMS will approve or disapprove the requests and notify all organizations. Once all determinations have been made, organizations may view the HPMS Plan Crosswalk Report located at: HPMS > Contract Management > Contract Reports > 2020 > Plan Crosswalk Report.

There are two scenarios for implementing approved crosswalk exceptions:

- CMS implements the plan crosswalk in MARx on behalf of the organization. In this case, organizations will see the approved exception crosswalk in their Plan Crosswalk Report, including the date on which the crosswalk was processed by HPMS.
- Where CMS is unable to implement the approved exception crosswalk, the organization effectuates them by submitting MARx enrollment transactions to

crosswalk the impacted enrollees to the appropriate plan. In this case, organizations will see a new table at the end of the Plan Crosswalk Report that identifies the plan(s) to which this action applies.

Please submit questions to: <https://dmao.lmi.org>. Select the Medicare Advantage tab and submit questions under the “Crosswalks” category.

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

Medicare Advantage Contract Renewal Options and Crosswalks

Medicare Advantage (MA) contracts are automatically renewed on an annual basis unless either Centers for Medicare & Medicaid Services (CMS) or the MA organization (MAO) provides notice of intent to non-renew or terminate the contract at the end of the current term. See 42 CFR 422.505(c)-(d).

Renewal of a contract is contingent on CMS and the MAO reaching agreement on the bid submitted by the MAO regardless of the MAO's qualifications for contract renewal under 42 C.F.R. Part 422 Subpart K. Failure to reach an agreement on the bid is not subject to the appeals provisions of 42 C.F.R. Part 422 Subpart N.

Introduction

This guidance specifically applies to non-Special Needs Plan (SNP) Health Maintenance Organizations (HMOs), HMO-Point of Service (POS) and Preferred Provider Organizations (PPOs). CMS does not permit plan renewals across product types. For example:

An MA-only plan cannot be renewed as, or consolidated into, an MA-Prescription Drug (PD) plan (and vice versa); HMO plans cannot renew as, or consolidate into, a PPO plans (and vice versa); HMO plans or PPO plans cannot renew as, or consolidate into, Private-Fee-for- Service (PFFS) plans (and vice versa); SNPs cannot renew as, or consolidate into, non-SNP MA plans (and vice versa); and Section 1876 cost contract plans cannot renew as, or consolidate into, MA plans (and vice versa). With limited exceptions, CMS will not permit consolidation of plan benefit packages (PBPs) across contracts, independent of plan type. However, a non-segmented plan may renew as, or consolidate into, a segmented plan and request that current enrollees be transitioned to plan segments.

As a result of business decisions, or pre- or post-bid discussions with CMS, MAOs may choose to change their current year offerings for the following contract year. Each year, current MAOs must indicate PBP renewal and non-renewal decisions and delineate, for enrollment purposes, the relationships between PBPs offered under each of their contracts for the coming contract year. MAOs also must adhere to certain notification requirements, some of which are indicated below. Most renewal options must be completed in HPMS Crosswalk module, with limited exceptions.

Annual renewal and non-renewal options should protect enrollment choices of beneficiaries and foster future beneficiary access and choice.

The Crosswalk Summary Table below presents all permissible renewal and non-renewal options for MAOs with HMO, HMOPOS, PPO, and Regional PPO (RPPO) plan types, including their method of effectuation, systems enrollment activities, enrollment procedures, and required beneficiary notifications. Each renewal/non-renewal option presented includes, where applicable, instructions and important deadlines that MAOs should carefully adhere to in order to ensure smooth year-to-year transitions.

If a renewal or non-renewal scenario is not explicitly presented in the Crosswalk Summary Table, or is not specified in annual CMS guidance, it is not a permissible renewal option for an MAO.

New Plan

An MAO may create a new PBP for the following contract year with no link to a PBP it offers in the current contract year in the HPMS Plan Crosswalk module. In this situation, beneficiaries electing to enroll in the new PBP must complete enrollment requests, and the MAO offering the MA plan must submit enrollment transactions to CMS.

Renewal Plan

An MAO may continue to offer (“renew”) a current PBP that retains all of the same service area for the following year. The renewing plan must retain the same PBP ID number as in the previous contract year in the HPMS Plan Crosswalk module. Current enrollees are not required to make an enrollment election to remain enrolled in the renewal PBP, and the MAO will not submit enrollment transactions to CMS for current enrollees. New enrollees must complete enrollment requests, and the MAO will submit enrollment transactions to CMS for those new enrollees. Current enrollees of a renewed PBP must receive a standard Annual Notice of Change (ANOC) notifying them of any changes to the renewing plan.

Consolidated Renewal Plan

MAOs are permitted to combine two or more entire PBPs offered in the current contract year into a single renewal plan in the HPMS Plan Crosswalk so that all enrollees in the combined plans are under one PBP with the same benefits in the following contract year. This is referred to as a plan consolidation. However, an MAO may not split a current PBP among more than one PBP for the following contract year.

MAOs that are consolidating one or more entire PBPs with another PBP must designate which of the renewal PBP IDs will be retained following the consolidation. The renewal PBP ID will be used to transition current enrollees of the plans being consolidated into the designated renewal plan.

Current enrollees of a plan or plans being consolidated into a single renewal plan will not be required to take any enrollment action, and the MAO does not submit enrollment transactions to CMS for those current enrollees. However, the MAO may need to submit updated 4Rx data to CMS for the current enrollees affected by the consolidation. New enrollees in the consolidated renewal plan must complete enrollment forms and the MAO must submit the enrollment transactions to CMS for those new enrollees. Plans are required to provide a standard ANOC to all current enrollees in the consolidated renewal plan.

Renewal Plan with a Service Area Expansion (SAE)

An MAO may continue to offer the same local MA PBP, but add one or more new service areas

(i.e., counties) to its service area for the following contract year. MAOs that include any new service area expansions must submit a service area expansion (SAE) application to CMS for review and approval. An MAO renewing a PBP with a SAE in the HPMS Plan Crosswalk module must retain the renewed PBP's ID number in order for all current enrollees to remain enrolled in that plan the following contract year.

Current enrollees of a PBP that is renewed with a SAE are not required to take any enrollment action, and the MAO does not submit enrollment transactions to CMS for those current enrollees. New enrollees must complete enrollment forms and the MAO must submit the enrollment transactions to CMS for those new enrollees. MA plans are required to provide a standard ANOC to all current enrollees of a renewed PBP with a SAE.

Renewal Plan with a Service Area Reduction and No Other MA Options Available

An MAO offering a local MA plan may reduce the service area of a current contract year PBP. This is known as a service area reduction, or SAR. An MAO renewing a plan with a SAR must retain the renewed PBP's ID number in the HPMS Plan Crosswalk module so that current enrollees in the renewal portion of the service area remain enrolled in the same plan the following contract year. Current enrollees in the renewal portion of the service area are not required to take any enrollment action, and the MAO does not submit enrollment transactions to CMS for these current enrollees. Plans are required to provide a standard ANOC to all current enrollees in the renewal portion of the service area.

Enrollees in the reduced service area(s) of the MA plan will be disenrolled at the end of the contract year. These enrollees will need to elect another plan. The MAO must submit disenrollment transactions to CMS for these enrollees. In addition, the MAO must send a non-renewal notice to enrollees in the reduced portion of the service area that includes notification of special election period (SEP) and Medigap guaranteed issue rights. When there are no other MA options in the reduced service area, the MAO may offer the affected enrollees in the reduced portion of the service area the option of remaining enrolled in the renewal plan consistent with CMS's continuation area policy, as provided under 42 CFR §422.74(b)(3)(ii). If an MAO elects to offer current enrollees in the reduced service area the option of remaining enrolled in the renewal plan, the MAO may provide additional information, in addition to the non-renewal notice, about the option to remain enrolled in the plan for the following contract year.

However, no specific plan information for the following contract year may be shared with any beneficiaries prior to October 1 of the current contract year. Enrollees in the reduced portion of the service area who wish to continue their enrollment must complete an enrollment request.

Renewal Plan with a Service Area Reduction When the MAO will offer another PBP in the Reduced Portion of the Service Area

An MAO offering a local MA plan may elect to reduce the service area of a current contract year's PBP and make the reduced area part of a new or renewal MA PBP service area in the following contract year. An MAO renewing a plan with a SAR must retain the renewed PBP's ID number in the HPMS Plan Crosswalk module so that current enrollees in the renewal portion

of the service area remain enrolled in the same plan in the following contract year.

Current enrollees in the renewal portion of the service area are not required to take any enrollment action, and the MAO should not submit enrollment transactions to CMS for these enrollees. Plans must provide enrollees with a standard ANOC.

Current enrollees in the reduced portion of the service area must be disenrolled, and the MAO must submit disenrollment transactions to CMS for these individuals. The MAO must send a non-renewal notice to current enrollees in the reduced portion of the service area that includes notification of SEP and Medigap guaranteed issue rights. If the MAO offers one or more MA plans in the reduced portion of the service area, it may offer current enrollees in the reduced portion of the service area the option of enrolling in that plan (or those plans). However, no specific plan information for the following contract year may be shared with any beneficiaries prior to October 1 of the current contract year. Any current enrollees in the reduced portion of the service area who wish to enroll in another MA plan offered by the same organization in the reduced service area must complete an enrollment request, and the organization must submit enrollment transactions to CMS for those enrollees.

Non-Renewal Plan (Terminated)

An MAO may elect to non-renew a current PBP for the following contract year. In this situation, the MAO should not submit disenrollment transactions to CMS for affected enrollees. CMS will disenroll these enrollees from the MA plan at the end of the contract year and these individuals must make a new election for their Medicare coverage.

Regardless of whether these individuals elect to enroll in another plan offered by the same or another MAO or to revert to original Medicare and enroll in a PDP, the enrollee must complete an enrollment request, and the enrolling organization or sponsor must submit enrollment transactions to CMS. If these enrollees do not make a new MA plan election prior to the beginning of the following contracting year, they will have original Medicare coverage as of January 1 of the following year. Plans must provide enrollees in non-renewed PBPs a non-renewal notice that includes notification of a special election period and Medigap guaranteed issue rights.

Non-Renewal Plan (Terminated) Section 1876 Cost Contract Plan

Although section 1876 cost contract plans generally follow the MA crosswalk guidance, in the case of a cost plan terminating a PDP with an optional supplemental benefit, CMS does not consider this a termination/non-renewal, and cost enrollees of a terminated PBP may be enrolled in another PBP offered by the cost plan.

If the terminated optional supplemental benefit is the Part D prescription drug benefit and the new plan does not include Part D, CMS requires that enrollees have clear notification that they are losing Part D, their options for obtaining Part D, and the implications if they don't get part D coverage by some other means. CMS does not permit passive enrollment of cost enrollees receiving healthcare only benefits into a cost plan with Part D. All other non-renewals involving other optional supplemental benefits may be indicated via the ANOC.

Crosswalk Table Summary

The following table summarizes the guidance in this document.

Activity	Guidelines	HPMS Plan Crosswalk	Systems Enrollment Activities	Enrollment Procedures	Beneficiary Notifications
New Plan (PBP) Added	An MAO creates a new plan benefit package (PBP).	HPMS Plan Crosswalk Definition: A new plan added for the following contract year that is not linked to a current contract year plan. HPMS Plan Crosswalk Designation: New Plan	The MAO must submit enrollment transactions for the following contract year.	New enrollees must complete an enrollment request.	None
Renewal Plan	An MAO continues to offer a current contract year MA PBP in the following contract year and retains all of the same service area. The same PBP ID number must be retained in order for all current enrollees to remain in the same MA PBP in the next contract year.	HPMS Plan Crosswalk Definition: A plan in the following contract year that links to a current contract year plan and retains all of its plan service area from the current contract year. The following contract year plan must retain the same plan ID as the current contract year plan. HPMS Plan Crosswalk Designation: Renewal Plan	The renewal PBP ID must remain the same so that current enrollees will remain in the same PBP ID. The MAO does not submit enrollment transactions for current enrollees.	No enrollment request for current enrollees to remain enrolled in the renewal PBP in the following contract year. New enrollees must complete an enrollment request.	Current enrollees are sent a standard ANOC.
Consolidated Renewal Plan	An MAO combines one or more whole MA PBPs of the same type offered in the current contract year into a single renewal PBP so that all current enrollees in combined PBP are offered the same benefits in the following contract	HPMS Plan Crosswalk Definition: One or more current contract year plans that consolidate into one plan for the following contract year. The plan ID for the following contract year must be the same as one of the consolidating	The MAO's designated renewal PBP ID must remain the same so that CMS may consolidate enrollees into the designated renewal PBP ID in CMS	No enrollment request is required for current enrollees to remain enrolled in the renewal PBP in the following contract year.	Current enrollees are sent a standard ANOC.

Activity	Guidelines	HPMS Plan Crosswalk	Systems Enrollment Activities	Enrollment Procedures	Beneficiary Notifications
	<p>year. The MAO must designate which of the renewal PBP IDs will be retained in the contract year after consolidation. CMS will not allow for consolidations across contracts (with limited exceptions for some renewal options, as described elsewhere in this guidance). Only whole PBPs may be consolidated; a current contract year PBP may not be split among different PBPs in the following contract year. Note: If an MAO reduces a service area when consolidating PBPs, it must follow rules for a plan renewal with SAR described elsewhere in this guidance.</p>	<p>current contract year plan IDs.</p> <p>HPMS Plan Crosswalk Designation: Consolidated Renewal Plan</p>	<p>systems. The MAO does not submit enrollment transactions for current enrollees. The MAO may have to submit 4Rx data for individuals whose PBP number changed.</p>	<p>New enrollees must complete an enrollment request.</p>	
Renewal Plan with an SAE	<p>This option is available to local MA plans only. An MAO continues to offer a current contract year local MA PBP in the following contract year and retains all of the same PBP service area, but also adds one or more new service areas. The same PBP ID number must be retained in order for all current enrollees to remain in the same MA PBP in the following</p>	<p>HPMS Plan Crosswalk Definition: A following contract year plan that links to a current contract year plan and retains all of its plan service area from the current contract year, but also adds one or more new counties. The following year contract plan must retain the same plan ID as the current contract year plan.</p>	<p>The renewal PBP ID must remain the same so that current enrollees in the remaining in the service area will remain in the same PBP ID. The MAO does not submit enrollment transactions for current contract year enrollees. The MAO</p>	<p>No enrollment request is required for current enrollees to remain enrolled in the renewal PBP in the following contract year. New enrollees must complete an enrollment request.</p>	<p>Current enrollees are sent a standard ANOC.</p>

Activity	Guidelines	HPMS Plan Crosswalk	Systems Enrollment Activities	Enrollment Procedures	Beneficiary Notifications
	contract year.	<p>HPMS Plan Crosswalk Designation: Renewal Plan with an SAE.</p> <p>Note: If the following contract year plan has both an SAE and a SAR, the plan must be renewed as a renewal plan with a SAR.</p>	submits enrollment transactions for new enrollees.		
Renewal Plan with a SAR and no other MA options available	<p>This option is available to local MA plans only. An MAO reduces the service area of a current contract year MA PBP and the reduced service area is not contained in another MA PBP offered by the same organization or any other MAO. The MAO may offer the option to individuals in the reduced portion of the service area for the following contract year to enroll in its remaining PBP if no other MA plans are available (see 42 CFR 422.74(b)(3)(i)).</p>	<p>HPMS Plan Crosswalk Definition: A following contract year plan that links to a current contract year plan and only retains a portion of its plan service area. The following contract year plan must retain the same plan ID as the current contract year plan.</p> <p>HPMS Plan Crosswalk Designation: Renewal Plan with a SAR.</p> <p>Note: If the following contract year plan has both an SAE and a SAR, the plan must be renewed as a renewal plan with a SAR</p>	The MA must submit disenrollment transactions for individuals residing in the reduced portion of the service area for which it does not collect an enrollment request. The MAO does not submit enrollment transactions for current enrollees in the renewal portion of the service area.	Enrollees impacted by the SAR need to complete an enrollment request if the MAO offers the option of continued enrollment (see 42 CFR 422.74(b) (3) (ii)).	The MAO sends a termination notice to current enrollees in the reduced service area that includes notification of SEP and guaranteed Medigap issue rights.
Renewal Plan with a SAR when the MAO will	This option is available to local MA plans only. An MAO reduces the service area of a current contract	HPMS Plan Crosswalk Definition: A following year contract plan that links to a current	The MAO must submit transactions to disenroll individuals residing	Enrollees impacted by the SAR need to complete	The MAO sends a termination notice to current enrollees in the reduced

Activity	Guidelines	HPMS Plan Crosswalk	Systems Enrollment Activities	Enrollment Procedures	Beneficiary Notifications
offer another PBP in the reduced portion of the service area.	year MA PBP and the reduced service area is part of a new or renewal PBP offered by that MAO in the following contract year. The MAO may market to enrollees in the reduced service area any other PBP offered in the reduced service area for the following contract year. Affected enrollees who elect to enroll in another MA plan offered in the reduced service area must submit an enrollment request.	contract year plan and only retains a portion of its plan service area. The following contract year plan must retain the same plan ID as the current contract year plan. HPMS Plan Crosswalk Designation: Renewal Plan with a SAR. Note: If the following contract year plan has both an SAE and a SAR, the plan must be renewed as a renewal plan with a SAR.	in the reduced portion of the service area. The MAO submits enrollment transactions to enroll beneficiaries who have requested enrollment in other PBP offered in the reduced service area.	enrollment requests if they elect to enroll in another PBP (plan) in the same organization or a different MA plan.	portion of the service area that includes notification of SEP and guaranteed issue Medigap rights. The MAO may also provide additional information, in addition to the termination notice, including instructions on how to complete an enrollment request to switch to another PBP offered by the same organization. Current enrollees in the renewal portion of the service area receive the standard ANOC.
Terminated Plan (Non-Renewal)	An MAO terminated the offering of a current contract year PBP.	HPMS Plan Crosswalk Definition: A current contract year plan that is no longer offered in the following contract year. HPMS Plan Crosswalk Designation: terminated Plan.	The MAO does not submit disenroll transactions. If the terminated enrollee elects to enroll in another MA plan with the same or any other MAO, that organization must submit enrollment transactions to enroll the beneficiary.	Terminated enrollees must complete an enrollment request if they choose to enroll in another PBP, even in the same organization.	Terminated enrollees are sent a terminated notice that includes notification of SEP and guaranteed issue Medigap rights.

Activity	Guidelines	HPMS Plan Crosswalk	Systems Enrollment Activities	Enrollment Procedures	Beneficiary Notifications
Terminated Plan (Non-Renewal) Section 1876 Cost Contract Plan	A cost contract plan terminated a current contract year PBP with an optional supplemental benefit	<p>HPMS Plan Crosswalk Definition: A current cost contract year PBP with an optional supplemental benefit that is no longer offered in the following contract year.</p> <p>HPMS Plan Crosswalk Designation: terminated cost contract PBP.</p>	Enrollees of the terminated PBP are not disenrolled and may be crosswalked to another of the cost contract plan's PBPs	No enrollment request is required for current enrollees to remain enrolled in the new PBP in the following contract year.	<p>Enrollees of a terminated Part D PBP must receive notification that they are losing Part D, their options for obtaining Part D, and the implications if they don't get part D coverage by some other means. CMS does not permit passive enrollment of cost enrollees receiving healthcare only benefits into a cost plan with Part D.</p> <p>All other terminations involving other optional supplemental benefits may be indicated via the ANOC.</p>