



MEDICARE-MEDICAID COORDINATION OFFICE

DATE: November 22, 2024

TO: Applicable Integrated Plans

FROM: Lindsay P. Barnette, Director
Models, Demonstrations and Analysis Group, Medicare-Medicaid Coordination Office

SUBJECT: Updated Addendum to the Parts C & D Enrollee Grievances, Organization/Coverage Determinations, and Appeals Guidance for Applicable Integrated Plans

Purpose

The Centers for Medicare & Medicaid Services (CMS) is announcing the release of an updated Addendum to the Part C & D Enrollee Grievances, Organization/Coverage Determinations, and Appeals Guidance (“Part C & D Guidance”) for applicable integrated plans. The updated guidance is effective January 1, 2025.

Background

Applicable integrated plans are D-SNPs and affiliated Medicaid managed care organizations (MCOs) that must meet the requirements for unified appeals and grievances procedures defined at 42 CFR 422.629-422.634.

This Addendum supplements the Part C & D Guidance. The Addendum notes in corresponding sections where requirements for applicable integrated plans differ from requirements from other Medicare Advantage plans due to differences in governing regulations. The Addendum also clarifies certain requirements and processes for applicable integrated plans.

This Addendum does not apply to Medicare Part D procedures. Applicable integrated plans will continue to follow all Part D requirements in 42 CFR Part 423, including the appeal requirements for Part D benefits. For reference, the Part C & D Guidance can be found here:

<https://www.cms.gov/medicare/appeals-and-grievances/mmcag/downloads/parts-c-and-d-enrollee-grievances-organization-coverage-determinations-and-appeals-guidance.pdf>

Updates

The Addendum updates incorporate regulatory changes from the Medicare Program; Changes to the Medicare Advantage and the Medicare Prescription Drug Benefit Program for Contract Year 2024 – Remaining Provisions and Contract Year 2025 Policy and Technical Changes to the Medicare Advantage Program, Medicare Prescription Drug Benefit Program, Medicare Cost Plan Program, and Programs of All-Inclusive Care for the Elderly (PACE) (CMS-4201-F3 and CMS-4205-F). Technical corrections to regulatory references were also made throughout the Addendum. All updates are in red font.

CMS will post the Addendum at <https://www.cms.gov/medicare/medicaid-coordination/about/dsnps>, under Unified Appeals and Grievances. Please direct any questions about this memorandum or the guidance Addendum to MMCO_DSNPOperations@cms.hhs.gov.