

DEPARTMENT OF HEALTH & HUMAN SERVICES
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CENTERS FOR MEDICARE & MEDICAID SERVICES

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TO: Medicare Advantage Organizations with a Dual Eligible Special Needs Plan

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SUBJECT: Medicare Managed Care Manual Chapter 16-B: Special Needs Plans: Updates on
Renewal Options and Crosswalks

The purpose of this memorandum is to share updates to section 50 of Chapter 16-B of the Medicare Managed Care Manual on renewal options and crosswalks for Special Needs Plans (SNPs).

The updated section now better reflects longstanding guidance that was codified in the Contract Year 2022 Medicare Advantage and Part D Final Rule (CMS-4190-F2) and Contract Year 2023 Medicare Advantage and Part D Final Rule (CMS-4192-F). Where there are differences between statute or regulations and the manual, the statute or regulations control over the manual (and any other guidance). Therefore, stakeholders should consult the applicable statutes, regulations, and final rules.

Chapter 16-B, incorporating the updated section, is available at the following link:
<https://www.cms.gov/regulations-and-guidance/guidance/manuals/downloads/mc86c16b.pdf>.

The updates for this section are also in Attachment A.

Please email MMCO at MMCO_DSNPOperations@cms.hhs.gov and your CMS Account Manager with any questions.

Attachment A – Updates to Section 50

50 – Renewal Options and Crosswalks

(Rev., Issued., Effective., Implementation:)

50.1 – General

(Rev., Issued., Effective., Implementation:)

The guidance in this section specifically applies to SNP renewal options and crosswalks *as codified at 42 CFR 422.530.¹ The regulation at 42 CFR 422.530 was adopted in 2021 to codify longstanding guidance with some modifications. Tables 6 through 8 below provides an overview of the SNP crosswalk policy. For general crosswalk guidance for all MA plans (as well as MA special needs plans), please refer to the Bid Submission User Manual, located under the Plan Bids tab in HPMS.*

50.2 – D-SNP Non-Renewals *for lack of a State Medicaid Agency Contract*

(Rev., Issued., Effective., Implementation:)

All MAOs that offer D-SNPs must have contracts with State Medicaid Agencies in the states in which they operate per section 1859(f)(3)(D) of the Act and 42 CFR 422.107. In the event that an MAO is not able to secure such a contract (or subcontract) with the State Medicaid Agency(ies) for one or more of its D-SNPs, the MAO must terminate those D-SNPs in accordance with 42 CFR 422.506 through 422.512. Enrollees in those plans will be disenrolled from their D-SNP and may elect to receive Part A and Part B benefits under original Medicare or another MA plan into which they wish to enroll. Enrollees who are dual-eligible have a SEP at 42 CFR 422.62(b)(1) available when an MA plan, (including a D-SNP), is terminating. In addition, enrollees who are dually eligible individuals have a SEP at 42 CFR 423.28(c)(4) that may be used once per quarter for the first 3 quarters of the calendar year by dually eligible individual or who are LIS eligible to changing MA-PD plans including D-SNPs. In the event of a D-SNP non-renewal, the D-SNP enrollees who do not make an enrollment request will be enrolled by default into original Medicare and automatically enrolled in a benchmark stand-alone PDP after the termination of the D-SNP. For more information about SEPs and enrollment periods available to dually eligible individuals, refer to Chapter 2 of the MMCO, which is also posted as the MA Enrollment and Disenrollment Guidance here:

¹ See also the final rules at 86 FR 5864, 5963 - 5969 (Jan. 19, 2021) (available online here: <https://www.govinfo.gov/content/pkg/FR-2021-01-19/pdf/2021-00538.pdf>) and 87 FR 27704, 27743 – 27768 (May 9, 2022) (available online here: <https://www.govinfo.gov/content/pkg/FR-2022-05-09/pdf/2022-09375.pdf>) for discussion of § 422.530.

<https://www.cms.gov/medicare/eligibility-and-enrollment/medicaremanagereeligenrol>.

50.3 – SNP Crosswalks

(Rev., Issued:, Effective:, Implementation:)

A crosswalk is the movement of enrollees from one plan (or plan benefit package (PBP)) to another plan (or PBP) under a contract between the MAO and CMS. To crosswalk enrollee from one PBP to another is to change the enrollment from the first PBP to the second. Except as specified in 42 CFR 422.530(c)(2), (3), and (4)(ii), MAOs may not crosswalk enrollees from one contract to another contract. MAOs may not crosswalk enrollees from one SNP type to a different SNP type.

In addition, MAOs must comply with renewal and nonrenewal rules in 42 CFR §§ 422.505 and 422.506 in order to complete plan or PBP crosswalks. Please refer to 42 CFR § 422.530 for the standard crosswalk rules applicable to all MA plans, including all SNPs. Please also refer to the annual End-of-Year Enrollment and Payment Systems Processing Information memo released each year for details related to the Medicare Advantage and Prescription Drug (MARx) System Transaction Processing and Rollover and Terminating Plan MARx Transaction Processing instructions. The tables below outline the crosswalk scenarios for D-SNPs, C-SNPs, and I-SNPs.

Table 6: C-SNP Crosswalk Scenarios

Activity	Regulatory Authority	Requires Crosswalk Exception	Allows Movement across Contracts	HPMS Plan Crosswalk
<p><i>Renewing C-SNP with one chronic condition that transitions eligible enrollees into another C-SNP with a grouping that contains that same chronic condition.</i></p> <p><i>Non-renewing C-SNP with one chronic condition that transitions eligible enrollees into another C-SNP with a grouping that contains the same chronic condition.</i></p> <p><i>Non-renewing C-SNP with a grouping that is transitioning eligible enrollees into a different C-SNP if the new grouping contains at least one condition that the prior plan contained.</i></p>	<p><i>42 CFR 422.530(b)(2)(i)(A)</i></p> <p><i>42 CFR 422.530(b)(2)(i)(B)</i></p> <p><i>42 CFR 422.530(b)(2)(i)(C)</i></p>	<p><i>No</i></p>	<p><i>No. Except as provided by § 422.530(c), crosswalks are prohibited between different contracts or different plan types (for example, HMO to PPO or from one type of SNP to a different type of SNP). Several types of exceptions are addressed elsewhere in Tables 6 through 8.</i></p>	<p><i>During Bid Submission window, select Plan Crosswalk Designation: Consolidated Plan Renewal</i></p>
<p><i>Renewing C-SNP with a grouping of multiple conditions that is transitioning eligible enrollees into another C-SNP with one of the chronic conditions from that grouping.</i></p>	<p><i>42 CFR 422.530(c)(5)</i></p>	<p><i>Yes</i></p>	<p><i>No. This is not one of the exceptions permitting a crosswalk across contracts.</i></p>	<p><i>During Bid Submission window, select Consolidated Renewal Plan</i></p>

Table 7: D-SNP Crosswalk Scenarios

Activity	Regulatory Authority	Requires Crosswalk Exception	Allows Movement across Contracts	Guidelines	HPMS Plan Crosswalk
<i>Renewing D-SNP with a multi-state service area that reduces its service area and moves enrollees who are no longer in the service area of the renewing D-SNP to one or more renewing D-SNPs (for which the enrollees are eligible) offered under the same parent organization.</i>	<i>42 CFR 422.530(c)(3)</i>	<i>Yes</i>	<i>Yes</i>	<i>Movement is permitted if the enrollees are eligible for the receiving D-SNPs and CMS determines the crosswalk is necessary to accommodate changes to the contracts between the state and D-SNP under 42 CFR 422.107.</i>	<i>During Crosswalk Exception Submission window, select Crosswalk Exception Request Type 2 – Renewing D-SNP with service area change, includes RPPO to LPPO</i>
<i>A D-SNP in a RPPO that non-renews to create state-specific local PPOs in its place to accommodate state contacting efforts in the service area and moves enrollees who are no longer in the service area to one or more renewing D-SNPs offered under the same parent organization.</i>	<i>42 CFR 422.530(c)(3)</i>	<i>Yes</i>	<i>Yes</i>	<i>Movement is permitted if the enrollees are eligible for the receiving D-SNPs and CMS determines the crosswalk is necessary to accommodate changes to the contracts between the state and D-SNP under 42 CFR 422.107.</i>	<i>During Crosswalk Exception Submission window, select Crosswalk Exception Request Type 2 – Renewing D-SNP with service area change, includes RPPO to LPPO</i>

Activity	Regulatory Authority	Requires Crosswalk Exception	Allows Movement across Contracts	Guidelines	HPMS Plan Crosswalk
<i>Renewing D-SNP has another new or renewing D-SNP and the two D-SNPs are offered to different populations, and moves enrollees who are no longer eligible for their current D-SNP into the other new or renewing D-SNP offered by the same MAO.</i>	<i>42 CFR 422.530(c)(4)(i)</i>	<i>Yes</i>	<i>No</i>	<i>Movement is permitted if the enrollees meet the eligibility criteria for the new or renewing D-SNP and CMS determines it is in the best interest of the enrollees to move to the new or renewing D-SNP in order to promote access and continuity of care for enrollees relative to the absence of a crosswalk exception.</i>	<i>During Crosswalk Exception Submission window, select Crosswalk Exception Request Type 3 – Change in D-SNP populations</i>
<i>MAO creates a new D-SNP-only MA contract when required by a state as described in 42 CFR 422.107(e), eligible enrollees may be moved from the existing D-SNP (that is non-renewing or having its eligible population newly restricted by a state to achieve exclusively aligned enrollment) to a D-SNP offered under the D-SNP-only contract.</i>	<i>42 CFR 422.530(c)(4)(ii)</i>	<i>Yes</i>	<i>Yes</i>	<i>The new D-SNP-only contract is approved and permitted by CMS under § 422.107(e) and movement must be to the same plan type operated by the same parent organization.</i>	<i>During Crosswalk Exception Submission window, select Crosswalk Exception Request Type 9 – MA-PD with a D-SNP transition to D-SNP only contract</i>

Table 8: I-SNP Crosswalk Scenarios

Activity	Regulatory Authority	Requires Crosswalk Exception	Allows Movement across Contracts	HPMS Plan Crosswalk
<i>Renewing Institutional SNP that transitions enrollees to an Institutional/Institutional Equivalent SNP</i>	<i>42 CFR 422.530(b)(2)(ii)(A)</i>	<i>No</i>	<i>No</i>	<i>During Bid Submission window, select Consolidated Renewal Plan</i>
<i>Renewing Institutional Equivalent SNP that transitions enrollees to an Institutional/ Institutional Equivalent SNP</i>	<i>42 CFR 422.530(b)(2)(ii)(B)</i>	<i>No</i>	<i>No</i>	<i>During Bid Submission window, select Consolidated Renewal Plan</i>
<i>Renewing Institutional/ Institutional Equivalent SNP that transitions eligible enrollees to an Institutional SNP</i>	<i>42 CFR 422.530(b)(2)(ii)(C)</i>	<i>No</i>	<i>No</i>	<i>During Bid Submission window, select Consolidated Renewal Plan</i>
<i>Renewing Institutional/ Institutional Equivalent SNP that transitions eligible enrollees to an Institutional Equivalent SNP</i>	<i>42 CFR 422.530(b)(2)(ii)(D)</i>	<i>No</i>	<i>No</i>	<i>During Bid Submission window, select Consolidated Renewal Plan</i>

<i>Activity</i>	<i>Regulatory Authority</i>	<i>Requires Crosswalk Exception</i>	<i>Allows Movement across Contracts</i>	<i>HPMS Plan Crosswalk</i>
<i>Nonrenewing Institutional/Institutional Equivalent SNP that transitions eligible enrollees to another Institutional/Institutional Equivalent SNP</i>	<i>42 CFR 422.530(b)(2)(ii)(E)</i>	<i>No</i>	<i>No</i>	<i>During Bid Submission window, select Consolidated Renewal Plan</i>

