

HPMS E-Mail

Date: April 18, 2024

Subject: Revised D-SNP Look-Alike Threshold Applying to Contract Year 2025 Non-SNP Medicare Advantage Bids

The CY 2025 Medicare Advantage (MA) and Part D Final Rule ([CMS-4201-F3 and CMS-4205-F](#)) amended the regulation at 42 CFR 422.514(d)(1) to provide that, for contract year 2025, CMS will not enter into or renew a contract for a MA plan – other than a special needs plan (SNP) or Medicare-Medicaid Plan (MMP) – that projects enrollment in its bid that 70 percent or more enrollees of the plan’s total enrollment will be dually eligible. This is a change from prior years where the dually eligible threshold was 80 percent. (The threshold will change again for 2026 to 60 percent.)

The CY 2025 MA and Part D Final Rule also amended the regulation at 42 CFR 422.514(d)(2) to provide that, for contract year 2025, the Centers for Medicare & Medicaid Services (CMS) will not renew a contract for an MA plan – other than a SNP or MMP – that has actual enrollment in the January of the prior contract year of 70 percent or more of enrollees who are dually eligible, unless the MA plan has been active for less than one year and has enrollment of 200 or fewer individuals at the time of such determination. CMS already contacted the plans meeting the 70-percent threshold that are subject to nonrenewal.

Please email the CMS Medicare-Medicaid Coordination Office at MMCO_DSNPOperations@cms.hhs.gov and your CMS Account Manager with any questions.