

CMS Releases Additional Guidance on D-SNP Integration Requirements

On January 17, 2020, the Centers for Medicare & Medicaid Services (CMS) issued [additional guidance and clarification](#) on four topics related to CY2021 requirements for Dual Eligible Special Needs Plans (D-SNPs):

- 1) Distinctions between fully integrated D-SNPs (FIDE SNPs) and highly integrated D-SNPs (HIDE SNPs);
- 2) Potentially permissible carve-outs (coverage exclusions) of behavioral health services and long-term services and supports (LTSS) for FIDE SNPs and HIDE SNPs;
- 3) Alignment of D-SNP and companion Medicaid plan service areas; and
- 4) Compliance with integration requirements for D-SNPs that only enroll partial-benefit dually eligible individuals.

The guidance follows on an October 2019 [HPMS memo](#) summarizing the new D-SNP requirements and providing guidance on contract and operational changes needed for CY2021.

States and their D-SNPs should begin working on any needed changes in D-SNP State Medicaid Agency Contracts (and state Medicaid MCO contracts, if applicable), and on any changes in policies and procedures needed to respond to the new integration requirements well in advance of the July 6, 2020 deadline submission of CY 2021 State Medicaid Agency Contracts to CMS.

States may send questions or technical assistance requests on the new standards to ICRC@chcs.org.

ABOUT THE INTEGRATED CARE RESOURCE CENTER

The Integrated Care Resource Center is a national initiative of the Centers for Medicare & Medicaid Services to help states improve the quality and cost-effectiveness of care for individuals dually eligible for Medicare and Medicaid. The state technical assistance activities are coordinated by Mathematica and the Center for Health Care Strategies. For more information, visit www.integratedcareresourcecenter.com.

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