

Changes to Dual-eligible Special Needs Plans (D-SNPs) for 2025

In 2022, the Centers for Medicare & Medicaid Services (CMS) made changes to the definitions for Fully Integrated D-SNPs (FIDE SNPs) and Highly Integrated D-SNPs (HIDE SNPs). These changes take effect in 2025 and set new requirements for plans.

In 2025, all FIDE SNPs must have exclusively aligned enrollment and cover certain Medicaid services, including:

- Primary and acute care (including Medicare cost-sharing for Part A and Part B benefits covered by the state Medicaid program)
- Home health
- Medical equipment, supplies, and appliances
- Behavioral health

Aligned and exclusively aligned enrollment

Aligned enrollment refers to when full-benefit dually eligible individuals who are enrolled in a D-SNP also receive coverage of Medicaid benefits from the D-SNP or from a Medicaid Managed Care Organization (MCO) that is:

- The same organization as the MA organization offering the D-SNP;
- Its parent organization;
- Or, another entity that is owned and controlled by the D-SNP's parent organization

Plans are considered to have exclusively aligned enrollment when state policy limits a D-SNP's membership to individuals with aligned enrollment.

FIDE SNPs must cover Medicare cost-sharing for both Qualified Medicare Beneficiaries (QMB) and non-QMB enrollees.

While previously FIDE SNPs could exclude behavioral health services from coverage consistent with any state carveouts for Medicaid behavioral health, in 2025 all plans must cover all behavioral health services offered by the state's Medicaid program (excluding permissible carveouts).

For 2025, all HIDE SNPs must cover Medicaid long-term services and supports, behavior health, or both. For HIDE and FIDE SNPs, the plan's service area must overlap completely with the service area of the affiliated Medicaid managed care plan.