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Comment On: CMS-2024-0332-0001

CMS Plan Benefit Package (PBP) and Formulary CY 2026 (CMS-R-262)

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Comment on CMS-2024-0332-0001

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General Comment

In addition to the changes in the in the 11/29/24 memo, Updates and Timeline for the Contract Year 2026 Plan Benefit Package, and the 60-day comment period of CY2026 PBP & Formulary changes posted (CMS-R-262, OMB 0938-0763) we ask CMS consider adjustments to the PBP supplemental benefit indicator of waving the required 3-day IP stay prior to a SNF stay.

An issue was raised by OACT after the rebate reallocation submission indicating our PBP and BPT did not align in indicating SNF supplemental benefits. The SNF supplemental benefit provided by our plan allow less than the 3-day IP stay prior to a SNF stay. This is indicated in the PBP Benefit Details section by checking a box in the SNF detail entry screens and entered the number of days.

There is not an option to select allowing less than the 3-day IP stay in the ‘Benefit Offerings’ section where non-Medicare services are selected. The non-Medicare SNF option allows the plan to select to coverage of additional days beyond Medicare. This is not the same allowing less than the 3-day IP stay for SNF services.

Because the BPT indicated we had a SNF supplemental benefit but we did not have the SNF non-Medicare covered item checked under ‘Benefit Offerings’ if flagged as a disconnect for OACT. We worked with Sara Walters to confirm the disconnect in supplemental benefit entry for this SNF supplemental benefit and that our PBP entry and BPT was correct with OACT.

To prevent this mis-match/issue from happening in CY2026 PBPs, we recommend CMS add the option to allow less than a 3-day IP stay prior to SNF services in the Benefit Details section or update the PBP to recognize this selection in the Benefit Details SNF entry screen is considered the supplemental benefit entry.