

Appendix A

Operational Guidance

Health Plan Management System (HPMS) Submission Instructions:

1. EOCs must be submitted in HPMS.
2. Unpopulated materials may not be submitted into HPMS. The organization must submit an EOC for each Contract/Plan Benefit Package (PBP) offered and must include all applicable cost-sharing and benefit information in the material.

Note: Non-English language versions of previously submitted English language versions of the EOC should not be submitted in HPMS. Please refer to the Submission, Review, and Distribution of Materials (42 C.F.R. §§ 422.2261 and 423.2261) section of the MCMG for additional information regarding non-English language and alternate format materials.

3. If D-SNPs split the EOC into two or more files (e.g., different files for different sections), all sections must be submitted as one document/file.
4. D-SNPs that have consolidated plans should include, in one “zipped” file, the ANOCs for both plans being consolidated. The zipped file should be uploaded under the remaining PBP. For example, H0001 is consolidating PBP 001 into PBP 002 for CY2025. One zipped file should be uploaded into HPMS under H0001 PBP 002. This zipped file should have the ANOC for PBP 001 and the ANOC for PBP 002. For consolidated plans, the EOC should be submitted for the remaining consolidated plan. Using the example above, the EOC should be submitted for PBP 002. To help identify the zipped ANOCs, organizations must use the following naming convention for all zipped ANOC files: the Plan's/Part D sponsor's contract number, (H number) followed by an underscore; the PBP number followed by an underscore, any series of alpha numeric characters (Plan discretion) followed by an underscore; and an uppercase “M” for marketing materials (for example: H0001_001_efg456_M or H0001_002_abc123_M).
5. The “No Longer in Use” button should not be selected for EOC submissions. Plans must submit updated EOCs via the material replacement function in HPMS.

Multiple EOC Material Versions:

Plans are permitted to upload different versions (not corrections) of EOC materials with the original submission in one “zipped” file.

Material Replacements:

Plans that change their current year EOCs (e.g., error corrections, Medicare FFS rate updates, policy updates) must submit updated materials via the material replacement function in HPMS. Refer to the MCMG, under “§§ 422.2261(d), 423.2261(d) – Standards for CMS Review,” and the HPMS Marketing Module User’s Guide for additional information regarding the material replacement function.

Note: *Plans that submit updated EOCs via the material replacement function to correct errors must also submit erratas for those errors in HPMS. Refer to the HPMS Memo, “Contract Year 2024 Annual Notice of Change and Evidence of Coverage Submission Requirements and Yearly Assessment,” to determine when erratas should be submitted.*

Note: *Do not submit errata sheets for updating Medicare fee-for-service (FFS) rates.]*