

Breakout: Is This a Sprint or a Marathon? Integrated Care, Where We've Been, and Where We're Going

October 29th, 2025
3:20pm – 4:10pm

Where We've Been

Medicare
Modernization Act of
2003 creates dual
eligible special needs
plans (D-SNPs)

Medicare
Improvements for
Patients and Providers
Act (MIPPA) requires
State Medicaid Agency
Contract (SMAC) for
D-SNPs

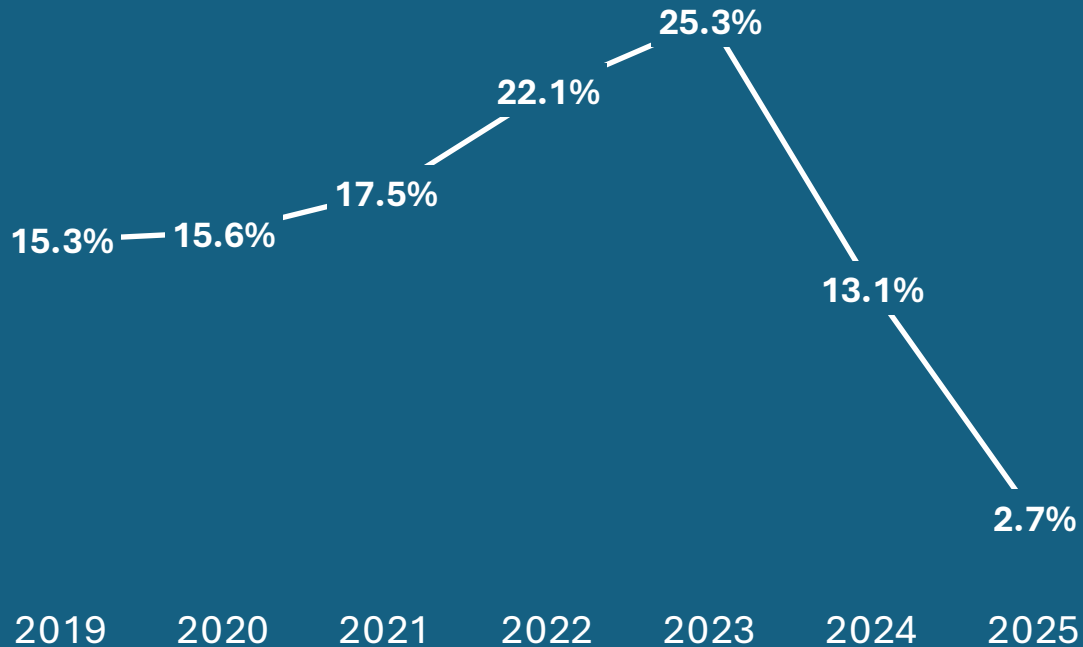
Financial Alignment
Initiative (FAI)
launched in 2013,
bringing with it the
Medicare-Medicaid
Plans (MMPs)

Bipartisan Budget Act
of 2018 makes all
SNPs permanent

2025 MAPD Final Rule
introduces 2027/2030
aligned enrollment
requirements (among
others)

Some data I think are interesting...

D-SNP ENROLLMENT GROWTH RATE¹



**Dual Eligible (Full + Partial)
Source of Coverage, Q4 2024²**

- All SNPs: 49%
- General MA: 11%
- Accountable Care FFS: 11%
- Non-Accountable FFS: 29%

D-SNP Enrollment(Full + Partial) by Type of D-SNP, Q4 2024²

- CO D-SNP: 3.07M (55%)
- HIDE-SNP: 2.05M (37%)
- FIDE-SNP: 0.4M (8%)

1: Data from KFF

2: Data from ATI Advisory

Where We're Going

States

- Annual SMAC Negotiation Process
- Carving-in dual eligible populations into Medicaid managed care, including MLTSS
- Program design decisions ahead of 2027/2030 alignment requirements

CMS

- Next frontier of duals policy for MMCO
- Broader reforms to Medicare Advantage

Congress

- Sweeping changes to duals coverage, like the DUALS Act
- Growing interest in MA reform overall and downstream impacts on D-SNPs

Health Plans

- Navigating the above and trying to size impacts
- Internal systems updates to reflect integrated sources of truth about benefits, eligibility, appeals & grievances, member communications, etc.