

Off-Cycle Model of Care (MOC) Submission Guidance

Dual Eligible (D-SNP) and Institutional (I-SNP) SNPs with a previously approved Model of Care (MOC), must submit Off-Cycle MOC documentation when there are substantive changes to operational processes. Because of the annual submission requirement, Chronic SNPs (C-SNPs) are not eligible for Off-Cycle submissions. Substantive revisions are those that have a significant impact on care management approaches, enrollee benefits, or SNP operations. Changes to the MOC are at the SNP's discretion; however, it is the responsibility of the SNP to notify The Centers for Medicare & Medicaid Services (CMS) of any substantive changes to the MOC via electronic submission to CMS's Health Plan Management System (HPMS). ***SNPs may not implement any changes to the MOC until the National Committee for Quality Assurance (NCQA)/CMS approves the changes.***

Off-Cycle Submission Window

Organizations can submit Off-Cycle MOC documentation from June 1 through December 1. Outside of this window, the HPMS Off-Cycle MOC submission gates are closed. NCQA staff download Off-Cycle submissions on the 15th of each month. Unless there are unresolved issues requiring additional review or guidance, the results are uploaded by the 15th of the following month. MOCs are designated as "Acceptable" or "Rejected." A SNP has one opportunity to Cure annually if their document is rejected.

SNPs may not submit a revised MOC before their approved MOC for the upcoming CY becomes effective. For example, SmartHealth's D-SNP submits its CY 2023 MOC in February 2022 for an effective date of January 1, 2023. The document meets the requirements and receives a three-year approval period with a score of 98.00%. In this case, the SNP may not submit revisions until June 2023, which is after its effective date of January 1, 2023. However, if during an audit it appears that the MOC is not meeting CMS standards, then CMS may ask the SNP to correct and resubmit the MOC regardless of the effective date of the MOC. Likewise, CMS may ask SNPs to resubmit their MOCs after an applicable regulation change to ensure that MOCs meet the new regulatory requirements.

Reportable Changes

Examples of MOC changes requiring an off-cycle submission include the following:

- Substantial changes in policies or procedures pertinent to:
 - The health risk assessment (HRA) process (but not changes to the HRA tool itself);
 - Revising processes to develop and update the Individualized Care Plan (ICP);
 - Risk stratification methodology; and
 - Care transition protocols.

- Target population changes that warrant modifications to care management approaches or changes in benefits (e.g., adding Diabetes to your Cardiovascular Disease and Congestive Heart Failure C-SNP).
- New inclusions or deletions/exclusions of benefits or services that impact critical functions necessary to maintain member well-being and related SNP operations.
- Changes in level of authority or oversight for conducting care coordination activities (e.g., medical provider to non-medical provider, clinical vs. non-clinical personnel). **Note:** Staff name changes are not considered a substantive change.
- Changes to quality metrics used to measure performance.

Format for Submitting

Please adhere to the following formatting and submission requirements:

- Include the Matrix and MOC documents.
- Include the date of the original submission and approval, as well as the Off-Cycle submission date, on the MOC cover.
- Identify whether the MOC and Matrix documents are for an Initial or a Cure Off-Cycle submission.
- Include a summary of revisions for respective elements either in the Matrix or provide a brief statement within the MOC in the introductory section of the document.
- Verbiage that is no longer relevant must be red-lined and revised language entered in colored font (preferably red font; however, other colors are acceptable). **Note:**
 - If plans do not include new language in colored font, NCQA staff will not review the submission.
 - Word documents are strongly preferred.
 - PDF documents are permitted; however, plans must explicitly identify changes in a different colored font. The use of comments to identify changes is not acceptable.

Nonreportable Changes

SNPs should not revise MOC documentation to gain a higher score. Scores remain the same and the original approval period stands. In addition, SNPs should not submit minor adjustments to refine or improve existing processes. These changes are not considered substantive revisions and do not require an Off-Cycle MOC submission.

Do not submit revisions that include:

- Changes in administrative staff, types/level of staff (e.g., adding steps or levels to administrative staff positions);

- Additions/deletions of specifically named providers (e.g., Dr. Smith is replacing Dr. Jones as a Neurology provider);
- Updates to demographic data about the target population (e.g., revising to address increases or decreases in target population data);
- Updates to quality improvement metric results (e.g., revising HEDIS or other outcome goals because of meeting/not meeting benchmarks); or
- Grammatical and/or non-substantive language changes (e.g., correcting misspelled words or sentence structure or document formatting).