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**DATE:** October 10, 2018

**TO:** Medicare Advantage Organizations  
Medicare-Medicaid Plans

**FROM:** Kathryn A. Coleman, Director, Medicare Drug & Health Plan Contract  
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**SUBJECT:** Changes to the Medicare Advantage Quality Improvement Program Regulations  
and Quality Improvement Project and Chronic Care Improvement Program  
Requirements

The purpose of this memorandum is to notify Medicare Advantage organizations (MAOs) and Medicare-Medicaid Plans (MMPs) of the recent changes to the Medicare Advantage (MA) Quality Improvement Program regulations at 42 C.F.R. § 422.152, and outline the requirements for Quality Improvement Projects (QIP) and Chronic Care Improvement Programs (CCIP) for the remainder of contract year (CY) 2018 and for CY 2019.

Through the CY 2019 Medicare Part C and D Final Rule (CMS-4182-F), published in the Federal Register on April 16, 2018, CMS modified the Quality Improvement Program requirements for MAOs in 42 C.F.R. § 422.152(a)(3) and (d).<sup>1</sup> Effective January 1, 2019, MAOs are no longer required to conduct QIPs. MAOs should close out all QIPs by the end of CY 2018. MAOs should document final results, best practices, and lessons learned in their final QIP Annual Update and complete their final QIP attestation in HPMS by December 31, 2018. These changes in the Medicare Advantage regulatory requirements also apply to MMPs. However, MMPs will still be subject to state-specific requirements under § 438.330(d) consistent with their three-way contracts.

MAOs and MMPs are still required to conduct CCIP initiatives, with a focus on promoting effective management of chronic disease. MAOs and MMPs with a current CCIP in progress will complete their CCIP over a three-year project cycle. MAOs and MMPs that are completing their CCIP project cycle and/or commenced operations on January 1, 2018 should implement their new CCIP on January 1, 2019. All MAOs and MMPs are expected to attest in HPMS by

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<sup>1</sup> CMS-4182-F is located at: <https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07179.pdf>.

December 31, 2018 that they have, or will have, an ongoing CCIP and maintain internal documentation regarding the status of their CCIP. Please note, CMS maintains the authority to request information on the status and results of ongoing projects.<sup>2</sup>

The QIP and CCIP requirements are located in the 2018/2019 QIP and CCIP Resource Document, located on the MA Quality website at: <https://www.cms.gov/Medicare/Health-Plans/Medicare-Advantage-Quality-Improvement-Program/Overview.html>.

If you have any questions, please submit an inquiry to the Medicare Part C Policy Mailbox, located at: <https://dpap.lmi.org>. For questions regarding MMPs, please submit an inquiry to the Medicare-Medicaid Coordination Office at [mmcocapsmodel@cms.hhs.gov](mailto:mmcocapsmodel@cms.hhs.gov).

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<sup>2</sup> 42 C.F.R § 422.152(c)(2)