Michigan Department of Health and Human Services
Program Policy Division PO Box 30809
Lansing MI 48909

MDHHS
Michigan Department of Health & Human Services
GRETCHEN WHITMER, GOVERNOR | ELIZABETH HERTEL, DIRECTOR

November 25, 2025

<Provider Name>
<Provider Address 1>
<Provider Address 2>
<City> <State> zipcode5-zipcode4

Dear Integrated Care Organizations:

RE: One-time Flexibility for Highly Integrated Dual Eligible Special Needs Plans (HIDE SNPs) to Adopt Nursing Facility Level of Care Determinations (LOCDs) without Obtaining a New Freedom of Choice (FOC) Form

This letter is a notification to the Integrated Care Organizations (ICOs) that are transitioning to the MI Coordinated Health (MICH) HIDE SNP program effective January 1, 2026.

On or before January 1, 2026, beneficiaries will be cross-walked to the HIDE SNP from the same sponsor ICO. MDHHS is granting a one-time policy flexibility to allow HIDE SNPs to adopt the current active LOCDs completed by the HIDE SNP's same sponsor ICO without obtaining a new FOC for the beneficiaries who are enrolled with a ICO prior to the transition. "Current and active" LOCDs have an eligible door (1-8) and a future end date. Door 87 cannot be adopted. When the LOCD is adopted, the end date still applies and HIDE SNPs must follow the regular process for conducting an updated LOCD prior to the end date. In addition, any LOCD that is adopted after January 1, 2026, must follow the regular adoption process as stated in policy.

Nursing facilities (NFs) that are responsible for conducting LOCDs are unaffected by this flexibility. NFs that are responsible for or have conducted a MI Health Link beneficiary's LOCD do not need to adopt or conduct a new one until the end date, in accordance with the regular adoption process as stated in policy.

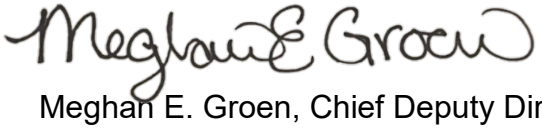
HIDE SNPs participating in the MICH program will be assigned a new provider ID that will differ from the provider ID of the HIDE SNP's same sponsor ICO. As a result, the LOCDs that ICOs conducted for beneficiaries that will be transitioning to MICH will appear to have been conducted by a different provider. However, because the beneficiary is not actually changing programs or providers, MDHHS is allowing this flexibility for HIDE SNPs to adopt the LOCD without obtaining a new FOC. This is a one-time flexibility that applies only to the ICOs.

The ICO is required to provide each beneficiary that is being transferred from the ICO to the HIDE SNP an Annual Notice of Change (ANOC) to explain the transition, along with providing information about options for counseling should the beneficiary choose to explore alternatives.

Questions regarding this notification can be directed to Kayla Kowal at Kowalk1@michigan.gov.

An electronic version of this document is available at www.michigan.gov/medicaidproviders >> Policy, Letters & Forms.

Sincerely,



Meghan E. Groen, Chief Deputy Director
Health Services