

PUBLIC SUBMISSION

As of: 8/17/21 11:24 AM Received: August 16, 2021 Status: Posted Posted: August 17, 2021 Category: Health Plan or Association Tracking No. ksf-1iwk-scqu Comments Due: August 16, 2021 Submission Type: Web
--

Docket: CMS-2021-0108

Medicare Part C and Part D Data Validation (42 CFR 422.516(g) and 423.514(j) (CMS-10305)

Comment On: CMS-2021-0108-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals

Document: CMS-2021-0108-0004

Comment on CMS-2021-0108-0001

Submitter Information

Email: eroman@medicalcardsystem.com

Organization: MCS Advantage, Inc

General Comment

Appendix B, page 4, section REPORTING SECTION CRITERIA (for 2021 reported data), GRIEVANCES (PART C) (for 2021 REPORTED DATA.),7.

For clarification the CY2021 Part D Reporting Requirements Technical Specifications are not required the distribution of the elements by category. The language for this 2022 document makes mention of categories. (Organization accurately calculates the number of grievances by category for which it provided timely notification of the decision, including the following criteria)

Appendix B: Data Validation Standards, page 24, item 6a and page 25, item 10a

There is a discrepancy between the CY2021 Part D Reporting Requirements Technical Specifications and the Attachment B: Data Validation Standards Document specifically, for the Coverage Determinations and Redeterminations Reporting. In accordance with the Medicare Part D Plan Reporting Requirements: Technical Specifications Document Contract Year 2021 updated in January 2021, states that for the coverage determination and redetermination reports the data should be reported based on the date the enrollee/enrollee's representative is notified in writing of the coverage determination and redetermination decisions. However, in the Attachment B: Data Validation Standards states that the data should be reported based on the date of decision that occurs during the reporting period, regardless of when the request for

coverage determination was received. Please clarify which is the correct date that the data should be reported for the year 2021.