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**Comments Received :**

Blue Cross Blue Shield of Michigan recommends CMS modify the language in the proposed 2022 Data Validation Manual Changes in Section 3.3 Complete the Web-Based Data Validation Training to the below:

“During the DV preparation phase, all SO staff facilitating the DV must complete the CMS web-based DV Training to familiarize themselves with the DV process and requirements. Additionally, all DV staff facilitating the audit are required to take the CMS web-based DV Training prior to working on the DV project.”