

June 26, 2023

Submitted electronically via [regulations.gov](https://www.regulations.gov).

Meena Seshamani, M.D., Ph.D.
CMS Deputy Administrator & Director of the Center for Medicare
Centers for Medicare & Medicaid Services
U.S. Department of Health & Human Services
P.O. Box 8013
Baltimore, MD 21244-8013

**RE: Agency Information; Notice of Proposed Collection; Medicare Part C and Part D
Data Validation**

Dear. Dr. Seshamani:

CVS Health appreciates the opportunity to provide comments on the Notice of Proposed Collection on “Medicare Part C and Part D Data Validation (CMS-10305)” issued by the Centers for Medicare & Medicaid Services (CMS) on April 25, 2023.¹

CVS Health serves millions of people through our local presence, digital channels, and our nearly 300,000 dedicated colleagues – including physicians, pharmacists, nurses and nurse practitioners. Our unique health care model gives us an unparalleled perspective on how systems can be better designed to help consumers navigate the health care system – and their personal health care – by improving access, lowering costs, and being a trusted partner for every meaningful moment of health. And we do it all with heart, each and every day.

We thank CMS for giving the public and stakeholders an opportunity to provide input on data validation requirements. Given our role as a health plan, health care provider, pharmacy and pharmacy benefits manager, we are well-positioned to provide comment on this issue.

Below are our comments on the Medicare Parts C and D data validation.

On page 9 of the proposed “CY2024 Medicare Part C and Part D Reporting Requirements Data Validation Procedure Manual” document, the following two steps have been removed from Exhibit 2, DDV Program Activities.

1. Provide draft findings to the sponsoring organization (SO)
2. Review draft findings and obtain additional documentation necessary to resolve issues

¹ Available in the Federal Register Vol. 88, No. 79 / Tuesday, April 25, 2023. 24990-24991.
<https://www.govinfo.gov/content/pkg/FR-2023-04-25/pdf/2023-08717.pdf>.

We request that CMS reconsider removal of the aforementioned steps. We recognize and appreciate CMS's efforts to revise the Medicare Data Validation process to decrease labor and cost burdens. However, ***we recommend retaining these steps within the Data Validation Procedure Manual to allow the Data Validation Contractor to provide preliminary findings to the Sponsoring Organizations prior to submission to CMS. This activity is critical in the validation process to discuss rebuttals or clarification to preliminary findings that the data validation contractor may determine, since these discussions may resolve the issue in the early stages, which will benefit all parties.***

Thank you for considering our comments. We understand that capturing accurate data is a top priority of CMS to effectively administer the Parts C and D programs. We stand ready to help CMS in any way we can to achieve its goals.

We would be happy to respond to any follow-up questions you may have.

Sincerely,

A handwritten signature in cursive script, appearing to read "Melissa Schulman".

Melissa Schulman
Senior Vice President, Government & Public Affairs
CVS Health