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Medicare Part C and Part D Data Validation (CMS-10305)

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Comment on CMS-2023-0069-0001

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General Comment

We understand and appreciate CMS' efforts to decrease labor and cost burdens associated with the annual Medicare Part C and Part D Data Validation. The CY2023 to CY2024 DV Crosswalk indicates that 5.3 Review Draft Findings with Sponsoring Organization and Obtain Additional Documentation Necessary to Resolve Issues in the current DV manual corresponds to 5.2 The EESs in the proposed manual. However we noticed that the proposed DV Manual does not include the following statement: "The SO and DVC should build time into the April-June DV schedule to allow sufficient review of the findings. Any issues identified during this review must be resolved prior to the data validation contractor's June 30 deadline for submitting findings to CMS."

This seems to indicate that the current draft review process is being eliminated and that scores are considered final upon entry by the DVC into the HPMS and that SOs only have the ability to resolve issues with the findings through the formal appeal process.

If this is not the case, we recommend that CMS reincorporate language in the DV manual that states the expectation for SOs and DVC to build time into the DV schedule to allow for sufficient review of findings prior to the submission of final findings to CMS.

If this is the case, then can CMS confirm that SOs will only be able to review findings and resolve issues through formal appeals process?