

Author Full Name : Amy Wood**Received Date :** 08/16/2023 01:11 PM**Comments Received :**

Hello,

As an auditor for the Medicare Part C&D Data validation, I strongly object to the changing of the audit timeline to end on June 15th. The changes being made to the Findings Data Collection Form (removing some elements and renaming it as the Examination Engagement Standards) does not actually change or remove ANY of the steps of the audit. We still have to perform and review all the same things as before - conduct interviews, perform census reviews, review policies and procedures, select and review samples, etc., for each measure and each contract. We have to allow the health plans time to collect this data and submit it for our review, and for plans to respond to any findings or issues identified. Changing 0% of our actual workload while simultaneously reducing our timeframe by 15% is unacceptable and challenges the integrity of the audit.

Additionally, CMS has a historical issue with providing needed resources and information for us to perform the audit. We are required to complete an annual training module, which CMS has repeatedly not issued until only a few days before the audit begins (2022 being the first time in many years that it was released early). MTMP data release for our audit is also an issue. These data don't get released into HPMS until early May, and the last 2 years have had issues that needed to be fixed and auditors don't actually get to review the data until late May, which would run close to the proposed new submission deadline to get all MTMP data reviews completed.

If earlier audit completion is the goal, then perhaps all the deadlines should be re-evaluated instead of just the audit timeframe - for example, all DV data submissions could be moved to the 2nd Monday of February instead of a split submission timeframe, the resubmission deadline could move up 2 weeks to March 15, and the audit could begin on March 16. This would preserve the audit timeframe and also allow for the earlier completion of the DV audit cycle.

Thank you for your time and consideration.

Amy Wood