

Description of Issue/Question	Suggested Revision/Correction
CMS Required Data Validation Reporting	<p>Data Validation (DV) reports that are provided to the Centers of Medicare & Medicaid Services (CMS) by each Sponsor Organization (SO) summarize pharmacy claim data that is duplicative information already provided to the CMS through Prescription Drug Event (PDE) submissions. Having each SO produce, maintain, and enhance these reports adds unnecessary expense to the healthcare system; as stated in this CMS release, in total over \$15 million and an additional \$300 thousand to the government for monitoring. The preference is for these dollars be used to offer Medicare beneficiaries either lower cost-sharing or increased benefits instead of inefficiencies in reporting. We recommend CMS evaluate the reports currently being provided to determine those that are duplicative summaries of data available through PDE submissions. Where this is taking place, the recommendation is that the CMS use one consistent application to summarize the results instead of requesting these summaries from each SO.</p>