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NY

Submitter Information

Name: Anonymous Anonymous
Address:
   NY, 11105

General Comment

On behalf of Advent Advisory Group, we would like to thank you for the opportunity to comment on the proposed changes for 2017-2018 Medicare Data Validation Audits. We have reviewed the five documents submitted in depth and have the following comments and questions:

We do not have any concerns regarding the enhanced reporting sections for Part C Organization Determinations/Reconsiderations and Part C SNP Care Management;
As Advent already utilizes detailed Data Integrity checks in our normal Data Validation audit process, we have no concerns regarding the added Data Integrity Checks for RSC-5 in all reporting sections for data validation;

Where Advent does have concerns regarding the implementation and ultimate impact of a Likert scale scoring approach for standards 1c, 1d, 1e, 1g, 1h and 2e. Based on the documentation provided, our understanding of the reasoning behind this change is to improve the precision of, and increase the variation in, the data validation scores. We discussed the proposed changes at length and 1.) do not see how this will achieve that goal; and 2.) do not agree the burden of scoring will remain unchanged.

While we understand that the proposed Likert scoring will now only allow plans to receive 75% of the total score for instances where they score between 90-95% for the standards in question, any scoring variation that may have occurred from this change would seem to be nullified by allowing plans to get partial credit for scores between 80-89.9%. The goal of achieving further variation in scoring would seem to have been better achieved by bumping up the materiality threshold to 95% from the present 90%. This would incent the plans to be even more diligent in their reporting as anything below a 95% score would result in a loss of points.

Questions we have for you in regards to this proposed Likert scale change are:

1.) Why were only the specific standards listed above chosen to be impacted by this change? For instance, why was Standard 3a not included in this proposal?

2.) It appears that Part C and D Grievances, based on the documentation provided, are no longer at 0% threshold for error. Is this correct? If so, this seems to run counter to CMS's goal for differentiation in scores, as having those measures set for 100% accuracy appeared to be a major differentiator in scores across Advent's book of business, and we would assume across all clients undergoing Data Validation review.

3.) It is our understanding that CMS intends that this scoring change would be put into effect starting with the 2017 DV season (for 2016 calendar year data). As this is a major change to scoring, and will require deeper understanding by all the SO's, training within the SO's and for all DV clients, we would kindly propose that should these changes be put into place, that they do not become effective until the 2018 DV season (for 2017 calendar year data). This will allow all SO's and client to get up to speed and fully understand the scope of these changes prior to them becoming effective. All of our proprietary tools and documentation will need updating to accommodate these changes and allowing for more time and education on CMS's expectations will ensure all SO's are implementing the changes in the same manner.

If you have any questions or concerns regarding our statements above, we would appreciate the opportunity to speak with you further on the proposed changes. Thank you again for the opportunity to review and respond.