

BCBSA Comments on Data Validation in the MA and Part D Program, CMS-10305 (OMB Control No. 0938-1115)—Federal Register June 30, 2016

Area(s)	Observation	Issue	Recommendation/Comments
Appendix 1 Data Validation Standards_Version 3_061516.508.pdf: Pages 3 & 4	In the table about REPORTING SECTION CRITERIA for Part C grievances, #6.j states "Excludes expedited grievances."	There appears to be some contradiction in that Appendix 1 Data Validation Standards_Version 3_061516.508.pdf: Page 4 in the table about REPORTING SECTION CRITERIA for Part C grievances, #6.j states "Excludes expedited grievances," but #5 item c and #8, item a.iii of the same section reference the inclusion of expedited grievances. Additionally, the Medicare Part C Plan Reporting Requirements Technical Specifications, item # 5, Page 9, indicates that the expedited grievances should be included in the reporting.	We recommend CMS confirm when/if expedited grievances should be included in the reporting.

Also one plan noted that the early February data submissions may be a challenge for plans and lead to more resubmissions.

Submitted by Jane Galvin, Managing Director, BlueCrossBlueShield Association, August 29, 2016