

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

UCare Comments

1. UCare requests that CMS provide additional details about the new “data integrity check” to help sponsors ensure that they have the sufficient documentation and/or explanations for data validation.
2. Please align the instructions in the Data Validation Procedure Manual, section 3.2.2.1 Process for Sponsoring Organization, with the instructions in the March 15, 2017 HPMS memo, *Instructions for Requesting Consultant Access or Electronic Signature Access to the Health Plan Management System*. The instructions are not identical and having two different sets of instructions is confusing.
3. UCare does not support the 100% accuracy threshold for Standard 3a in the Part C and Part D Grievances reporting sections. UCare does not believe that only a 100% score demonstrates compliance and requests that Standard 3a for Grievances use the 90% accuracy threshold that is used by all other reporting sections.