

PUBLIC SUBMISSION

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(CMS-10305) Medicare Part C and Part D Data Validation (42 CFR 422.516(g) and 423.514 (g))

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(CMS-10305) Medicare Part C and Part D Data Validation (42 CFR 422.516(g) and 423.514 (g))

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General Comment

We appreciate the clarity given to the Reporting Requirements through the release of the Medicare Part C and D Data Validation of Reporting Requirements. However, we request CMS provide greater clarification on the reporting of withdrawals and dismissals in the Total Number of Coverage Determinations (CD) and Redeterminations (RD).

In Reporting Section Criteria 5 of the Data Validation Procedure Manual | Appendix B: Data Validation Standards for Data Validation Occurring in 2018, CMS clarifies that the Total Number of CDs should include withdrawals and dismissals. However, the same section does not require inclusion of withdrawals and dismissals in Total Number of RDs, whereas Reporting Section Criteria 17 requires inclusion of dismissals and withdrawals. This has led to confusion on whether dismissals and withdrawals should be included in the Total Number of RDs.

We request CMS' clarification on whether the Total Number of RDs should include withdrawals and dismissals for the reporting year.