

From: FN-OMB-OIRA-Submission
To: [Bryman, Mitch \(CMS/OSORA\)](#)
Cc: [Echols, Mabel E. EOP/OMB](#)
Subject: Fw: [EXTERNAL] CMS-10305 Comment
Date: Wednesday, February 28, 2018 12:37:12 PM

From: Carlo.Teano@attesthealth.com <Carlo.Teano@attesthealth.com>
Sent: Tuesday, February 27, 2018 11:38 AM
To: FN-OMB-OIRA-Submission
Subject: [EXTERNAL] CMS-10305 Comment

Dear Sir / Madam,

I made an attempt to submit Public Comment on CMS-10305 for Medicare Part C and Part D Data Validation (42 CFR 422.516(g) and 423.514(g)). Due to technical difficulties on the regulations.gov site I was not able to submit comment via the site. Following is copy of our comment. I am hoping this can be accepted.
Item #

Comment Submitted By

File Name

Page/Section #

Topic

Issue

Recommendation

1 Attest FDCF and Appendix B 2e, RSC-5.j and Standard 5.j in Appendix B 5.j Data Integrity check states 'Verify that there is a valid value submitted for date of original disposition as MM/DD/YYYY format (Data Element 6.26). [Data Element 6.26] Typo? Date format should be MMDDYYYY

2 Attest Appendix J FDCF FINAL_01182018.pdf 73 / 2d 2d does not have a RSC 2d is missing a RSC number. Consider adding a RSC number to 2d

3 Attest Appendix J FDCF 3 CDR Measure Draft FDCF contains duplicate language related to pharmacy transactions in both 2.e, RSC-5.e & 2.e, RSC-5.f. We believe Standard 2.e, RSC-5.f: The following numbers do not exceed the total number of pharmacy transactions rejected (Data Element 2.A) is intended for Coverage Determinations. To align with the Medicare Part C and Part D Reporting Requirements Data Validation Procedure Manual Appendix B: Data Validation Standards, suggest an update to the final Appendix J FDCF, Standard 2.e, RSC-5.f to state:
The following numbers do not exceed the total number of coverage determinations including exceptions (Data Element 2.A).

4 Attest Appendix J FDCF 12 CDR Measure Draft FDCF DV Standard 2.e, RSC-17.j states: Verify that redetermination requests that are withdrawn or dismissed are not included in the count of total redeterminations. [Data Element 3.A] but it contradicts with DV Standard 2.e, RSC-5.g which states the following: Number of redeterminations by outcome (Data Element 3.E + Data Element 3.F + Data Element 3.G + Data Element H + Data Element I) is equal to total number of redeterminations (Data Element 3.A). To align with the Medicare Part C and Part D Reporting Requirements Data Validation Procedure Manual Appendix B: Data Validation Standards, suggest an update to the final Appendix J FDCF, Standard 2.e, RSC-17.j to state:
Verify that redetermination requests that are withdrawn or dismissed are not included in the count of total redeterminations. [Data Element 3.A]

Thank you,
Carlo

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