

Comments on Data Validation Standards for Data Validation Occurring in 2020 (2019 Reporting Data)				
Comment/Response From: SilverScript Insurance Company (contract S5601)				
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Document Title	Page Number	Section Title	Specific Text from Document that is being commented upon	Comment
Medicare Part C and Part D Reporting Requirements Data Validation Procedure Manual Appendix B: Data Validation Standards For Data Validation Occurring in 2020	Page 33 (labeled page 31 in PDF)	Section 6: a, b, c: iii.	Rejected opioid claims are counted at the unique contract , beneficiary, prescriber, pharmacy, drug (daily dose and quantity) , and date of service (DOS).	1. This counting criteria does not match up with the counting criteria listed in the 2019 Reporting Requirements Technical Specifications on page 42 subsection 4: "Rejected claims are counted at the unique plan, beneficiary, prescriber, pharmacy, drug (strength and dosage form), quantity, date of service(DOS) and formulary-level cumulative opioid MME POS edit." We recommend aligning the Data Validation requirement with the Technical Specifications, using the Technical Specification requirement. 2. The Technical Specifications Section E. Note 4 states: "Rejected claims are counted at the unique plan, beneficiary, prescriber, pharmacy, drug (strength and dosage form), quantity, date of service (DOS) and formulary-level cumulative opioid MME POS edit." The Data Validation requirements have omitted this requirement (see cell 6D). We recommend that this missing Technical Specification language be added to the Data Validation requirement.

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Medicare Part C and Part D Reporting Requirements Data Validation Procedure Manual Appendix B: Data Validation Standards For Data Validation Occurring in 2020	Page 24 (labeled page 22 in PDF)	Section 5: f and g	f. Verify that the date of disposition for each reopening (Data Element 3.B.11) is after the date of original disposition (Data Element 3.B.5). g. Verify that the date of each reopening disposition (Data Element 3.B.11) is after the date that the case was reopened (Data Element 3.B.9). The date a reopening occurs can be the same day the case is dispositioned, and a reopening disposition can occur on the same day as the reopening date of a case. We would recommend that CMS modify the language in this section as follows, in order to prevent auditor confusion: f. Verify that the date of disposition for each reopening (Data Element 3.B.11) equal to or later than the date of original disposition (Data Element 3.B.5). g. Verify that the date of each reopening disposition (Data Element 3.B.11) equal to or later than the date that the case was reopened (Data Element 3.B.9).