



DATE: March 30, 2020

TO: All Medicare Advantage Organizations, Part D Sponsors, Medicare-Medicaid Plans, and All Programs of All-Inclusive Care for the Elderly (PACE) Organizations

SUBJECT: Reprioritization of PACE, Medicare Parts C and D Program, and Risk Adjustment Data Validation (RADV) Audit Activities

The Centers for Medicare & Medicaid Services (CMS) recently issued guidance announcing that it is prioritizing and suspending non-emergency federal and State Survey Agency surveys to allow surveyors and facilities to focus on protecting individuals from the spread of infectious disease, including the recent spread of COVID-19.¹ Consistent with that action, CMS is reprioritizing the audit activity discussed below for Medicare Advantage organizations, Part D sponsors, Medicare-Medicaid Plans, and PACE organizations in order to allow CMS and these organizations to focus on the health and safety threats currently faced by enrollees, participants, and other impacted individuals.

Medicare Parts C and D and PACE Program Audits

CMS is reprioritizing its scheduled program audits for Medicare Advantage organizations, Part D sponsors, Medicare-Medicaid Plans, and PACE organizations until further notice.² CMS will continue its oversight of these organizations, but will temporarily shift our oversight activities from conducting routine audit activities to prioritizing the investigation and resolution of:

- Instances of noncompliance where the health and/or safety of beneficiaries are at serious risk (for example, lack of access to critically needed health services or prescription drugs); and
- Complaints alleging infection control concerns, including COVID-19 or other respiratory illnesses.

¹ <https://www.cms.gov/medicare/quality-safety-oversight-general-information/coronavirus>

² Audits conducted pursuant to 42 CFR §§ 422.503(d)(2), 423.504(d)(2), 460.190, and 460.192.

Contract-Level RADV Audits

CMS is suspending RADV activities related to the payment year 2015 audit and will not initiate any additional contract-level audits until after the public health emergency has ended.

Organizations should immediately suspend soliciting RADV-related medical records from providers.

An organization may submit to CMS any medical record documentation that has already been obtained from providers. The Central Data Abstraction Tool (CDAT) will remain open for that purpose. The RADV mailbox and CDAT help desk will also remain open.

CMS will continue reviewing medical records that have been submitted, including submissions for the 2014 audit, and providing feedback to organizations through CDAT.

Effective Date: Immediately. The suspension of the audit activities mentioned in this memorandum will be time-limited. CMS will make an announcement when normal audit activities are resumed after the public health emergency has ended.

Questions

- Questions related to contract-level RADV audits should be sent to RADV@cms.hhs.gov
- PACE organizations may send PACE audit questions to PACEAuditQs@cms.hhs.gov
- All other organization types may send program audit questions to Part_c_part_d_audit@cms.hhs.gov