



CENTER FOR MEDICARE

DATE: September 23, 2022

TO: All Medicare Advantage Organizations, Prescription Drug Plan Sponsors, Medicare-Medicaid Plans, and 1876 Cost Plans

FROM: Amy Larrick Chavez-Valdez
Director, Medicare Drug Benefit and C & D Data Group

SUBJECT: Results of the 2022 Part C and D Reporting Requirements Data Validation

Organizations contracted to offer Medicare Part C and/or Part D benefits are required to submit data to the Centers for Medicare and Medicaid Services (CMS) per the Medicare Part C and D Reporting Requirements.^{1,2} The data are subject to validation through an independent yearly review in order to ensure they are reliable, valid, complete, comparable, and timely.³ The data validation reviews of contract year (CY) 2021 Medicare Part C and D data were conducted between April 1, 2022, and June 30, 2022, and this memorandum summarizes the results of those reviews.

A total of 774 contracts completed data validation. Validation was conducted for 671 Medicare Advantage (MA) Prescription Drug Plans (MA-PDs), 8 MA-only contracts, 57 Prescription Drug Plans (PDPs), and 38 Medicare-Medicaid Plans (MMPs). Tables 1 and 2 below contain a statistical summary of the data validation scores.

Table 1: Statistical Summary of Data Validation Scores by Organization Type *

Organization Type	No. Contracts	Minimum Score	Maximum Score	Mean Score	Standard Deviation
MA only	8	97%	100%	99.40%	1.20%
PDP	57	99%	100%	99.90%	0.20%
MA-PD	671*	85%	100%	99.80%	0.80%
MMP	38	97%	100%	99.90%	0.50%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2022.

*Note: Reflects one MA-PD contract that completed Part C data validation, but did not undergo Part D data validation.

¹ Part C Reporting Requirements can be found at: <https://www.cms.gov/Medicare/HealthPlans/HealthPlansGenInfo/ReportingRequirements>

² Part D Reporting Requirements: https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/RxContracting_ReportingOversight

³ Part C and D Reporting Requirements Data Validation materials can be found at: <https://www.cms.gov/Medicare/Prescription-DrugCoverage/PrescriptionDrugCovContra/PartCDDDataValidation>

Table 2: Statistical Summary of Overall Data Validation Scores *

DV Score	No. Contracts	Minimum Score	Maximum Score	Mean Score	Standard Deviation
Overall Part C	679	75%	100%	99.70%	1.30%
Overall Part D	765 **	95%	100%	99.90%	0.40%
Overall Combined Part C and D	774	85%	100%	99.80%	0.80%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2022. Overall Part C data validation scores include MA-only and MA-PD contracts. Overall Part D data validation scores include MA-PD, PDP, and MMP contracts. Overall combined Part C and D data validation scores include MA-only, MA-PD, PDPs, and MMP contracts.

** Number of contracts with an Overall Part D score excludes one MA-PD contract that did not undergo Part D data validation.

Table 3 presents the distribution of the overall combined data validation scores. Only 2 contracts scored below 95% (rounded to the nearest whole number), which is an improvement from last year's data validation cycle.

Table 3: Distribution of Overall Combined Part C and D Data Validation Scores*

Overall Score	No. Contracts	Percent of Total Contracts (%)	Cumulative Percent of Total Contracts (%)
85%	1	0.13	0.13
94%	1	0.13	0.26
95%	3	0.39	0.65
96%	1	0.13	0.78
97%	3	0.39	1.16
98%	10	1.29	2.45
99%	63	8.14	10.59
100%	692	89.41	100.00
Total	774		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2022. Scores rounded to nearest whole percent.

Table 4 displays the distribution of the overall Part C data validation scores. Out of 679 contracts, 6 (0.88%) scored below 95%.

Table 4: Distribution of Part C Data Validation Scores*

Overall Score	No. Contracts	Percent of Total Contracts (%)	Cumulative Percent of Total Contracts (%)
75%	1	0.15	0.15

Overall Score	No. Contracts	Percent of Total Contracts (%)	Cumulative Percent of Total Contracts (%)
90%	1	0.15	0.29
92%	2	0.29	0.59
94%	2	0.29	0.88
95%	1	0.15	1.03
96%	3	0.44	1.47
97%	12	1.77	3.24
98%	25	3.68	6.92
99%	42	6.19	13.11
100%	590	86.89	100.00
Total	679		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2022. Scores rounded to the nearest whole percent.

Table 5 contains the distribution of the overall Part D data validation scores. There were no contracts that scored below 95%, out of 765.

Table 5: Distribution of Part D Data Validation Scores*

Overall Score	No. Contracts	Percent of Total Contracts (%)	Cumulative Percent of Total Contracts (%)
95%	2	0.26	0.26
96%	1	0.13	0.39
97%	7	0.92	1.31
98%	1	0.13	1.44
99%	10	1.31	2.75
100%	744	97.25	100.00
Total	765		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2022. Scores rounded to nearest whole percent.

Table 6 displays a statistical summary of the data validation scores by reporting section. Part D Improving Drug Utilization Review Control had the highest mean score (99.99%) and Part C Organization Determinations & Redeterminations had the lowest mean score (99.48%).

Table 6: Statistical Summary of 2021 Reporting Section Data Validation Scores*

Reporting Section	No. of Contracts Validated	Minimum Score	Maximum Score	Mean Score	Standard Deviation
Part C:					
Grievances	678	81%	100%	99.82%	1.42%

Reporting Section	No. of Contracts Validated	Minimum Score	Maximum Score	Mean Score	Standard Deviation
Organization Determinations & Redeterminations	679	69%	100%	99.48%	2.05%
Special Needs Plan Care Management	337	86%	100%	99.77%	1.18%
Part D:					
Coverage Determinations & Redeterminations	765	87%	100%	99.92%	0.80%
Grievances	765	81%	100%	99.84%	1.40%
Medication Therapy Management Programs	752	96%	100%	99.98%	0.21%
Improving Drug Utilization Review Control	764	96%	100%	99.99%	0.15%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2022.

A total of 6 unique contracts (0.88%) scored below 95% for overall average, and/or below 95% for Part C average, and/or below 95% for Part D average, and/or below 95% on all three scores.

Sponsors may view their individual contracts' 2022 data validation results in HPMS. Go to HPMS (<https://hpms.cms.gov>). Then navigate to Monitoring, followed by Plan Reporting Data Validation, choose CY 2021 (data validation period April 2022 – June 2022), and then Plan Reporting Data Validation Module (PRDVM) Reports. Please submit any questions or comments to the CMS Part C and D data validation resource mailbox at: PartCandD_Data_Validation@cms.hhs.gov.