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DATE: September 23, 2021

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

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SUBJECT: Results of the 2021 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) 2020 Medicare Part C and D data were conducted between April 1, 2021 and June 30, 2021, and this memorandum summarizes the results of those reviews.

A total of 715 contracts completed data validation. Validation was conducted for 607 Medicare Advantage (MA) Prescription Drug Plans (MA-PDs), 9 MA-only contracts, 60 Prescription Drug Plans (PDPs) and 39 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	9	97%	100%	99.70%	1.00%
PDP	60	94%	100%	99.83%	0.75%
MA-PD	607	81%	100%	99.60%	1.50%
MMP	39	96%	100%	99.77%	0.76%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2021.

¹ Part C Reporting Requirements can be found at: <https://www.cms.gov/Medicare/Health-Plans/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-Drug-Coverage/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	615	64%	100%	99.40%	2.50%
Overall Part D	706	94%	100%	99.80%	0.70%
Overall Combined Part C and D	715	81%	100%	99.70%	1.50%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2021.

*Overall combined Part C and D Data Validation scores include MA-PDs, Part C for MA only contracts, and Part D for PDPs.

*Overall Part C, Part D, and Combined Part C and D Data Validation scores include MMP contracts.

Table 3 presents the distribution of the overall combined data validation scores. A total of 13 contracts (1.8%) scored below 95% (rounded to the nearest whole number). In comparison, 6 contracts scored below 95% in the 2019 data validation cycle of CY 2018 plan-reported data.

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 (%)
81%	1	0.14	0.14
88%	1	0.14	0.28
89%	4	0.56	0.84
91%	4	0.56	1.40
93%	1	0.14	1.54
94%	2	0.28	1.82
95%	1	0.14	1.96
96%	2	0.28	2.24
97%	4	0.56	2.80
98%	6	0.84	3.64
99%	50	6.99	10.63
100%	639	89.37	100.00
Total	715		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2021. Scores rounded to nearest whole percent. Tables 3-5 mutually exclusive.

*Overall combined Part C and D Data Validation scores include MA-PDs, Part C for MA only contracts, and Part D for PDPs.

Table 4 displays the distribution of the overall Part C data validation scores. Out of 615 contracts, 16 (2.6%) 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 (%)
64%	1	0.16	0.16
82%	1	0.16	0.33
83%	4	0.65	0.98
85%	1	0.16	1.14
87%	1	0.16	1.30
88%	3	0.49	1.79
90%	1	0.16	1.95
91%	1	0.16	2.11
92%	1	0.16	2.28
94%	2	0.33	2.60
96%	2	0.33	2.93
97%	4	0.65	3.58
98%	17	2.76	6.34
99%	46	7.48	13.82
100%	530	86.18	100.00
Total	615		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2021. Scores rounded to nearest whole percent.
Tables 3-5 mutually exclusive

Table 5 contains the distribution of the overall Part D data validation scores. Out of 706 contracts, 10 (1.4%) scored below 95%.

Table 5: Distribution of Part D Data Validation Scores*

Overall Score	No. Contracts	Percent of Total Contracts	Cumulative Percent of Total Contracts
94%	10	1.42	1.42
96%	1	0.14	1.56
97%	6	0.85	2.41
98%	4	0.57	2.97
99%	18	2.55	5.52
100%	667	94.48	100.00
Total	706		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2021. Scores rounded to nearest whole percent.
Tables 3-5 mutually exclusive.

Table 6 displays a statistical summary of the data validation scores by reporting section. Part D Medication Therapy Management had the highest mean score (100%) and Part C Grievances had the lowest mean score (99.33%).

Table 6: Statistical Summary of 2020 Reporting Section Data Validation Scores*

Reporting Section	No. of Contracts Validated	Minimum Score	Maximum Score	Mean Score	Standard Deviation
Part C:					
Grievances	615	70%	100%	99.33%	3.36%
Organization Determinations & Redeterminations	615	58%	100%	99.48%	2.42%
Special Needs Plan Care Management	295	75%	100%	99.76%	1.61%
Part D:					
Coverage Determinations & Redeterminations	705	88%	100%	99.88%	0.87%
Grievances	704	78%	100%	99.55%	2.78%
Medication Therapy Management Programs	690	100%	100%	100%	0.02%
Improving Drug Utilization Review Control	706	90%	100%	99.95%	0.52%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in August 2021.

A total of 17 unique contracts (2.3%) 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' 2021 data validation results in HPMS. Go to HPMS (<https://hpms.cms.gov>). Then navigate to Monitoring, followed by Plan Reporting Data Validation, choose CY 2020 (DV period April 2021 – June 2021), and then PRDVM Reports. Please submit any questions or comments to the dedicated CMS Part C and D data validation resource mailbox at PartCandD_Data_Validation@cms.hhs.gov.