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**TO:** All Medicare Advantage Organizations (MAOs), 1876 Cost Plans, Part D sponsors, and Potential Third-Party Data Validation Contractors

**FROM:** Cynthia G. Tudor, Ph.D., Director  
Medicare Drug Benefit and C & D Data Group  
Center for Medicare

**DATE:** April 20, 2012

**SUBJECT:** Best Practices for Data Validation Reviewers

After the completion of one data validation cycle and the start of the current cycle, the Centers for Medicare and Medicaid Services (CMS) wants to make certain reviewers are aware of best practices they can utilize to ensure efficient and reliable data validation reviews are performed. CMS recommends reviewers exercise the following best practices throughout the data validation review.

- The reviewer should remain an objective, independent third party and avoid acting in a consulting capacity.
- The reviewer's focus should be to determine, after a thorough evaluation, if Sponsors' systems, programs, data, etc. are accurate, reliable, valid, and complete based on instructions and standards outlined in the Data Validation Procedure Manual and CMS' policies. The reviewer should remain impartial. For example, he/she should not pass judgment on the perceived value of Sponsors' systems, programs, data, etc. or develop findings based on personal preferences or any other method not addressed in the outlined standards or CMS' policies.
- The reviewer should provide general feedback and specific information on deficiencies to help Sponsors improve. However, Sponsors' submissions of corrective action plans (either written or verbal) are not required to be provided to the reviewer.
- The reviewer should maintain confidentiality of Sponsors' privileged information. The reviewer should avoid sharing general or specific information about how Sponsors' data look and/or compare to one another. To promote effective communication, open discussions of any issues and findings with the specific Sponsor are encouraged. The reviewer should refrain from discussing a specific Sponsor's issues and findings with other Sponsors.

If you have additional specific questions regarding the data validation program or these best practices for data validation contractors, please direct them to CMS via the data validation mailbox @ [PartCandD\\_Data\\_Validation@cms.hhs.gov](mailto:PartCandD_Data_Validation@cms.hhs.gov).