DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

CENTER FOR MEDICARE

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

FROM: Cynthia G. Tudor, Ph.D., Director
              Medicare Drug Benefit and C & D Data Group
              Centers for Medicare and Medicaid Services

DATE: March 3, 2011

SUBJECT: Instructions to Data Validation Reviewers Regarding Scoring of Part C
              Measure and Part D Section Standards

CMS has developed reporting standards and data validation specifications with respect to
the Part C and Part D reporting requirements. This memorandum provides instructions to
the data validation reviewers regarding scoring of Part C measure and Part D section
standards for the data validation which will occur between March 1, 2011 and May 31,
2011.

The assessment of whether participating organizations meet specific Part C and Part D
Data Validation Standards will sometimes require either a census approach—all records
or data values are included in the assessment—or a sampling approach. When the data
validation reviewers conduct their data validation review, using either a census or a
sampling methodology, CMS expects that there will be situations when participating
organizations are only in partial compliance with specific data validation standards.

CMS does not believe that 100% compliance is necessary to demonstrate compliance on
many given standards. This is specifically the case when samples of records are collected
which involve many data values—all of which would have to be correct to demonstrate
compliance. CMS has reviewed and considered this situation and has established a
threshold value of 90 percent for meeting standards in which the data validation involves
samples or the complete census of records and/or data values.

Examples: A random sample of 150 records is drawn, each with one data value. The
calculation to establish the threshold for compliance in this scenario would be as follows:
0.90 x 150=135. At least 135 of the records are correct for the measure specific criteria
to be recorded as "Yes". Consider another case in which the sample size is 205. To be in
compliance, at least 185 data values have to be "correct" for the measure specific criteria
to be recorded as "Yes". The calculation is as follows: 0.90 x 205=184.5. Round 184.5
to 185.

If you have any questions regarding these instructions, please submit them to:
PartCandD_Data_Validation@cms.hhs.gov.