

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
Center for Beneficiary Choices  
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**CENTER FOR DRUG AND HEALTH PLAN CHOICE**

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TO: All Medicare Advantage Organizations, Part D Sponsors, and 1876 Cost Plans

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

SUBJECT: Call for Industry Comments on the Medicare Part C and Part D Data Validation Standards, Standards for Selecting a Data Validation Contractor, and Organizational Assessment Instrument

DATE: September 16, 2009

The Centers for Medicare & Medicaid Services (CMS) is pleased to release the following documents for industry comment:

1. Data Validation Standards
2. Standards for Selecting a Data Validation Contractor
3. Organizational Assessment Instrument (OAI)

As background, organizations contracted to offer Medicare Part C and Part D benefits are expected to validate data reported to CMS on a variety of reporting requirements per 42 CFR §422.516 (a) and §423.514. Pages 27-28 of Section V of the 2010 Call Letter at <http://www.cms.hhs.gov/PrescriptionDrugCovContra/Downloads/2010CallLetter.pdf> discuss the Part C and D Data Validation expectations. In brief, in order for Part C and Part D data to be useful for monitoring and performance measurement, they must be reliable, valid, complete, and comparable among sponsoring organizations. To meet this goal, CMS has established *Data Validation Standards* with respect to the Part C and Part D reporting requirements for Medicare Advantage Organizations (MAOs), Cost Plans, and Part D sponsors. These standards will assess an organization's information systems capabilities and overall processes for collecting, storing, compiling, and reporting the required data measures beginning in 2010.

Part C organizations and Part D sponsors are responsible for acquiring data validation resources through a contractor. In order to ensure the independence of the data validation, organizations should not use their own staff to conduct the data validation. CMS is providing a set of *Standards for Selecting a Data Validation Contractor* as guidance for organizations to use in acquiring a data validation contractor. These standards describe the minimum qualifications, credentials, and resources that the selected data validation contractor must possess.

CMS is also providing an *Organizational Assessment Instrument (OAI)* as a tool to be used to assess Part C and Part D organization data processes. The tool will allow the select contractor to

1) catalog all data currently collected across the organization, 2) capture the flow of data, and 3) understand how the organization compiles, validates, stores, and reports the data. The information collected in this OAI will help prepare the contractor in conducting the reviews for Part C and Part D reporting requirements and will reduce resources required for the on-site portion of the review.

We thank you in advance for your careful review and comments on these documents. To be assured consideration, please submit your comments on the Data Validation Standards, Standards for Selecting a Data Validation Contractor, and the OAI electronically using the attached comments form to PartCandD\_Data\_Validation@cms.hhs.gov by 5:00 pm EDT on September 30, 2009.