



CMS 2010 MEDICARE ADVANTAGE & PRESCRIPTION DRUG PLAN SPRING CONFERENCE

Sheraton Baltimore City Hotel, April 20-21, 2010

Verbatim Transcript

Part C&D Reporting Requirements and Data Validation

Part 1

THE MAIN PURPOSE OF THE SESSION
TODAY IS TO PROVIDE YOU

WITH AN OVERVIEW OF
THE DATA VALIDATION PROCESS.

I KNOW THERE'S BEEN A
CONSIDERABLE AMOUNT OF INTEREST

IN THAT.

THE OVERVIEW IS GOING TO INCLUDE
THE REQUIREMENTS AND DOCUMENTS

THAT ARE INVOLVED, MILESTONES,
AND TIMELINES.

I'LL BE HIGHLIGHTING OUTSTANDING
ISSUES THAT CMS WILL BE

ADDRESSING IN THE COMING MONTHS.

WE WILL ALSO
AT THE END HAVE SOME TIME

FOR A COUPLE OF QUESTIONS.

MOST OF THE QUESTIONS THAT YOU
WILL HAVE SHOULD BE, YOU KNOW,

ADDRESSED TOMORROW.

AND THERE IS, I BELIEVE,
SOME NOTE CARDS BACK AT THE END

OF THIS ROOM, WHERE YOU CAN
WRITE DOWN QUESTIONS

THAT YOU HAVE.

AND I THINK THAT WE'LL

HAVE MORE TIME TOMORROW.

I BELIEVE IT'S AROUND--

11:00 I BELIEVE THE SESSION
IS TOMORROW.

BUT WE MAY HAVE A MINUTE OR TWO
TO HANDLE A COUPLE QUESTIONS

YET TODAY.

OK, THE BACKGROUND
FOR THE DEVELOPMENT

OF THE DATA VALIDATION
STANDARDS.

AS OUTLINED IN
THE 2010 CALL LETTER,

ORGANIZATIONS OFFERING
MEDICARE PART C AND D BENEFITS

ARE REQUIRED
TO REPORT DATA TO CMS

ON A VARIETY OF
REPORTING REQUIREMENTS.

THESE DATA ARE NEEDED TO ANSWER
INQUIRIES FROM CONGRESS

AND OTHER ENTITIES ABOUT
AN ORGANIZATION'S OPERATIONS,

COSTS, AVAILABILITY,
AND USE OF SERVICES,

NETWORK ADEQUACY, GRIEVANCES,
AND A VARIETY OF OTHER CONCERNS.

THESE DATA WILL ALLOW CMS TO
MONITOR SPONSORING ORGANIZATIONS

MORE EFFECTIVELY BY HAVING
THEIR DATA VALIDATED.

SPONSORING ORGANIZATIONS
CAN MAKE IMPROVEMENTS

IN THEIR INTERNAL PROCESSES

THROUGH THIS

DATA VALIDATION PROCESS.

THE DATA VALIDATION
PROGRAM REQUIREMENTS.

CMS HAS CONTRACTED WITH
BOOZ ALLEN HAMILTON TO DEVELOP

THE DATA VALIDATION STANDARDS.

THE STANDARDS WILL ASSESS
THE REPORTED DATA,

ORGANIZATIONS' PROCESSES FOR
COLLECTING, STORING, AGGREGATING

AND ANALYZING DATA.

JUST AS AN EXAMPLE, WE'LL BE
ABLE TO ASSESS

WHETHER SOURCE DOCUMENTS
CAPTURE THE REQUIRED DATA FIELDS.

OR ANOTHER EXAMPLE, ARE
STANDARD--ACCESS--MEASURES,

WHETHER SOURCE DOCUMENTS
INDICATE THAT DATA ELEMENTS ARE

ACCURATELY IDENTIFIED.

THE DATA VALIDATION REVIEWS
WILL BE RETROSPECTIVE INVOLVING

A REVIEW OF DATA
ALREADY REPORTED TO CMS.

BY HAVING EACH ORGANIZATION'S
PROCESSES REVIEWED, CMS WILL BE

ABLE TO DETERMINE WHETHER
THE DATA ARE VALID, RELIABLE,

AND COMPARABLE AMONG THE VARIOUS
ORGANIZATIONS.

THE DATA VALIDATION
REQUIREMENTS.

THE DATA VALIDATION REVIEWS WILL
BEGIN IN THE SPRING OF 2011.

I KNOW THERE'S BEEN SOME

CONFUSION ABOUT THIS,

BUT THE ACTUAL REVIEWS WILL
BEGIN IN THE SPRING OF 2011.

THOSE REVIEWS WILL BE FOR
THE CALENDAR YEAR OF 2010

CMS REQUIREMENTS.

ORGANIZATIONS ARE REQUIRED
TO CONTRACT WITH A THIRD PARTY

DATA VALIDATION REVIEWER
OR AUDITOR.

THIS WILL HELP TO ENSURE THAT
THE REVIEW IS AN UNBIASED ONE.

ORGANIZATIONS WILL BE EXPECTED
TO PROVIDE SUPPORT

AND DOCUMENTATION
AS NEEDED BY THE AUDITOR.

BUT THE AUDITOR, AGAIN,
WILL BE COMPLETELY INDEPENDENT

OF THE ORGANIZATION.

SPONSORING ORGANIZATIONS AND
THE DATA VALIDATION CONTRACTOR

ARE REQUIRED TO USE CMS-ISSUED
PROCESSES AND TOOLS.

FOR EXAMPLE, THE DATA VALIDATION
DOCUMENTS AND STANDARDS

CURRENTLY IN DEVELOPMENT--

THOSE ARE THE TOOLS REQUIRED
TO BE USED BY

THESE DATA VALIDATION
CONTRACTORS.

THE DATA VALIDATION REVIEWS
WILL BE CONDUCTED

AT THE CONTRACT LEVEL.

AND THERE WILL BE NO ACTUAL
THRESHOLDS OF ENROLLMENT.

SO THAT EVERYBODY WILL BE
REVIEWED WHETHER YOU ARE

A VERY SMALL PLAN. ONLY A FEW
ENROLLEES ARE A VERY LARGE PLAN.

NOW, THE PART C MEASURES THAT
WILL UNDERGO THE DATA VALIDATION

ARE IN FRONT OF YOU.
THERE ARE 9 OF THEM.

BENEFIT UTILIZATION,
PROCEDURE FREQUENCY,

SERIOUS REPORTABLE ADVERSE
EVENTS,

PROVIDER NETWORK ADEQUACY,
GRIEVANCES,

ORGANIZATION DETERMINATIONS/
RECONSIDERATIONS,

EMPLOYER GROUP PLAN SPONSORS,
PLAN OVERSIGHT OF AGENTS,

AND SPECIAL NEEDS PLAN CARE
MANAGEMENT.

THAT IS, 9 OF THE 11 REMAINING
PART C REPORTING REQUIREMENTS

WILL BE AUDITED.

THE PART D SECTIONS--

WE CALL THEM SECTIONS

RATHER THAN MEASURES
FOR PART D--TO UNDERGO

THE DATA VALIDATION ARE
AS YOU CAN SEE ON THE SLIDE...

RETAIL, HOME INFUSION, AND
LONG-TERM CARE PHARMACY ACCESS,

MEDICATION MANAGEMENT THERAPY
PROGRAMS, GRIEVANCES,

COVERAGE DETERMINATIONS
AND EXCEPTIONS, APPEALS,

LONG-TERM CARE UTILIZATION,

EMPLOYEE/UNION-SPONSORED GROUP
HEALTH PLAN SPONSORS,

AND PLAN OVERSIGHT OF AGENTS.

NOW, THE NEXT FEW SLIDES ARE
GONNA REVIEW

THE PROGRAM SCHEDULE AND PROVIDE
AN OVERVIEW OF THE PROGRESS

THAT CMS HAS MADE TO DATE IN
DEVELOPING

THE DATA VALIDATION PROGRAM.

WE HELD STAKEHOLDER INTERVIEWS

IN JUNE AND JULY OF 2009.

AND, BASICALLY, WE SOLICITED

EXPERIENCES FROM PART C AND D

SPONSORING ORGANIZATIONS ABOUT
THEIR COLLECTION AND SUBMITTING

OF RECORDING REQUIREMENT DATA
TO CMS.

WITH EACH INTERVIEW, WE
COLLECTED BACKGROUND INFORMATION

TO BETTER UNDERSTAND THE DATA
COLLECTION VALIDATION PROCESS.

WE IDENTIFIED VULNERABILITIES
IN THE DATA COLLECTION

VALIDATION AND REPORTING.

AND WE SOLICITED RECOMMENDATIONS
FOR REQUIREMENTS FOR SELECTING

A DATA VALIDATION REVIEW
CONTRACTOR.

REGARDING DATA VALIDATION
DOCUMENT DEVELOPMENT,

THAT OCCURRED INITIALLY IN

JULY THROUGH AUGUST OF 2009.

WE DEVELOPED SEVERAL DRAFT
DOCUMENTS AT THAT TIME.

THEY INCLUDED

THE DATA VALIDATION
STANDARDS, FIRST DRAFT,

THE ORGANIZATIONAL ASSESSMENT
INSTRUMENT,

AND THE STANDARDS FOR SELECTING
A DATA VALIDATION CONTRACTOR.

IN SEPTEMBER OF
2009, WE CONDUCTED

AN INDUSTRY COMMENT PERIOD.

THESE 3 DOCUMENTS THAT I ALREADY
NAMED WERE RELEASED

FOR AN INDUSTRY REVIEW
AND COMMENT PERIOD.

WE RECEIVED MORE THAN 400
COMMENTS ON THOSE DOCUMENTS

FROM APPROXIMATELY
60 ORGANIZATIONS.

AND I WOULD LIKE TO ADD THAT WE

DO APPRECIATE THE TIME

AND ATTENTION YOU GAVE IN
REVIEWING THESE DOCUMENTS

AND PROVIDING US WITH
THE COMMENTS AND SUGGESTIONS

FOR IMPROVEMENT. AND I THINK
THEY WERE GREATLY IMPROVED

UPON YOUR SUGGESTIONS.

WE CATALOGUED EACH COMMENT AND
ADDRESSED MANY OF THEM TO DATE.

WE ADDRESSED THEM THROUGH
HPMS MEMOS AND THROUGH REVISIONS

TO THE DATA VALIDATION DOCUMENTS
THEMSELVES.

PHASE ONE, PILOT TESTING.

THAT TOOK PLACE IN

SEPTEMBER AND OCTOBER OF 2009.

WE USED ONE LARGE MA-PD AND
ONE PDP CONTRACT

TO DO THAT PILOT TEST.

THE PURPOSE OF THAT TEST WAS TO
ASSESS THE EFFECTIVENESS

OF THE DATA VALIDATION
COLLECTION TOOLS

TO BE USED FOR THE FUTURE
DATA VALIDATION REVIEWS.

PILOT TESTING INVOLVED

AN ON-SITE REVIEW

SO THAT EACH ORGANIZATION'S
DATA, SYSTEMS,

AND REPORTING PROCESSES COULD
BE OBSERVED FIRSTHAND.

CMS IDENTIFIED THE FINDINGS
FROM EACH PILOT AND DETERMINED

IMPROVEMENTS TO THE DATA
VALIDATION PROCESS, STANDARDS,

AND DOCUMENTS USED.

BASED ON THE REVIEW

OF THE INDUSTRY COMMENTS

AND PILOT FINDINGS IN THE FALL,

WE REVISED

THE ORGANIZATIONAL
ASSESSMENT INSTRUMENT

AND THE DATA VALIDATION
STANDARDS.

WE ALSO AT THAT TIME
FIRST DEVELOPED

THE SAMPLING INSTRUCTIONS
TO BE USED

IN THE DATA VALIDATION AUDIT.

Part 2

PHASE 2 OF PILOT TESTING

ACTUALLY HAS JUST BEEN COMPLETED

IN THE LAST MONTH. ACTUALLY,
I BELIEVE LAST WEEK

IT WAS COMPLETED.

AND AT THAT TIME, OUR PRIMARY
PURPOSE WAS REALLY TO TEST

THE SAMPLING METHODOLOGY.

WE THINK THAT THE FINDINGS FROM
THE PHASE 2 TEST WILL REALLY

INFORM ADDITIONAL REVISIONS TO
THE PROCESS

AND ALL OUR DOCUMENTS,
BUT ESPECIALLY TO

THE SAMPLING METHODOLOGY.

SO WHERE ARE WE AT THIS POINT
TODAY?

CMS IS SUBMITTING
THE DATA VALIDATION DOCUMENTS

TO OMB FOR THE INFORMATION
COLLECTION REQUIREMENTS.

IT'S ALSO CALLED THE PRA--

UNDER THE PAPERWORK
REDUCTION ACT.

AS PART OF THIS PROCESS,
THE INDUSTRY WILL BE ABLE

TO COMMENT ON THE DOCUMENTS
OVER THE COURSE OF

A 60-DAY PERIOD,
A PUBLIC COMMENT PERIOD,

AND THEN THERE WILL BE

AN ADDITIONAL
30-DAY COMMENT PERIOD.

BASED ON THE COMMENTS RECEIVED,
CMS WILL REVISE

THE DATA VALIDATION DOCUMENTS.

THEY'LL BE REVISED AS NECESSARY.

AND WE'LL RESUBMIT THEM TO OMB
FOR THEIR REVIEW AND CLEARANCE.

DOCUMENTS THAT ARE UNDERGOING
THE INDUSTRY REVIEW

AND COMMENTS ARE EXPECTED
TO BE POSTED TO THE CMS WEBSITE

THIS WEEK. AND I JUST FOUND OUT
THIS AFTERNOON THEY, IN FACT,

ARE POSTED AT THIS TIME.

LET ME GIVE YOU--AND I DON'T
HAVE IT WRITTEN OR ON A SLIDE--

BUT YOU MAY WANT TO COPY THIS
DOWN. IT'S ON THE CMS WEBSITE.

IT'LL BE [http://www.cms.gov/
paperworkreductionactof1995...](http://www.cms.gov/paperworkreductionactof1995...)

THAT'S ONE WORD. NO BLANKS IN
BETWEEN WORDS.

[http://www.cms.gov/
paperworkreductionactof1995/pralists.asp#...](http://www.cms.gov/paperworkreductionactof1995/pralists.asp#...)

HA HA! AND WE'RE GETTING THERE.

[http://www.cms.gov/
paperworkreductionactof1995/pralists.asp#topofpage](http://www.cms.gov/paperworkreductionactof1995/pralists.asp#topofpage)

OK? AND IF YOU DON'T WANT
TO GO THROUGH ALL THAT,

JUST GO TO THE CMS WEBSITE
AND PUT IN

"PAPERWORK REDUCTION ACT,"
AND YOU'LL GET THERE.

OK. THE FIRST COMMENT PERIOD
WILL END JUNE 18th.

THE INDUSTRY AGAIN WAS NOTIFIED
ACTUALLY YESTERDAY ABOUT THIS.

SO JUNE 18th WILL BE THE END
OF THE FIRST 60-DAY
COMMENT PERIOD.

A 30-DAY COMMENT PERIOD WILL
COMMENCE SHORTLY AFTER THAT.

WE EXPECT THAT THE OMB CLEARANCE
PROCESS WILL BE WRAPPED UP

IN THE FALL.

NOW, CMS TRAINING. TRAINING
IS A BIG ISSUE HERE.

AND WE'VE BEEN WORKING ON THIS
A LOT LATELY,

AND JUST HOW WE'RE GOING TO GO
ABOUT DOING THIS.

RIGHT NOW OUR THINKING IS THAT
WE'RE GOING TO HOLD

A WEBINAR TRAINING FOR
SPONSORING ORGANIZATIONS

AND POTENTIAL DATA VALIDATION
CONTRACTORS.

WE EXPECT TO HOLD
THAT THIS FALL.

NOW OUR THINKING IS IT'S

NOT JUST GOING TO BE A SINGLE
WEBINAR AND THEN, YOU KNOW, YOU

GO HOME AND DIGEST THAT,

BUT, RATHER, YOU'LL HAVE THE
WEBINAR, YOU'LL BE ABLE TO GO

BACK TO THAT, YOU KNOW,
AS MANY TIMES AS YOU WANT.

DURING THE WEBINAR, THERE
SHOULD BE A BUILDING

OF INFORMATION BECAUSE
IT'S AN INTERACTIVE PROCESS.

THERE'LL BE VARIOUS QUESTIONS
THAT'LL BE ADDRESSED

AT THAT TIME. AND THE ANSWERS
WILL ACTUALLY APPEAR

ON THE SCREEN.

THAT IS OUR THINKING
AT THIS POINT.

WE WANT SORT OF
AN APPROACH THAT'LL ALLOW

FOR CONTINUOUS LEARNING.

THIS TRAINING WILL PROVIDE
AN OPPORTUNITY FOR ORGANIZATIONS

AND POTENTIAL THIRD PARTY
CONTRACTORS TO LEARN

WHAT THEY NEED ABOUT THE DATA
VALIDATION PROGRAM

AND ITS SPECIFIC REQUIREMENTS.

NOT ALL OF WHAT THEY NEED, BUT
CERTAINLY A SOUND FOUNDATION

FOR WHAT THEY NEED.

WE WILL COMMUNICATE MORE ABOUT
THIS TRAINING, INCLUDING

THE SCHEDULED DATES,
IN THE FUTURE.

THE RELEASE OF THE "MANUAL
OF DATA VALIDATION STANDARDS

AND PROCEDURES," WE ANTICIPATE

RELEASING A MANUAL

OF DATA VALIDATION STANDARDS
AND PROCEDURES LATER THIS FALL.

THE MANUAL WILL INCLUDE THE FINAL
DOCUMENTATION TO BE USED

FOR THE DATA VALIDATION PROGRAM.

ORGANIZATIONS AND DATA
VALIDATION CONTRACTORS WILL BE

ABLE TO REFERENCE THE MANUAL

FOR THE FINALIZED DATA
VALIDATION REQUIREMENTS

AND TOOLS.

THE DATA VALIDATION
REVIEWS THEMSELVES--

AND THAT'S THIS SLIDE--ARE
EXPECTED

IN THE PERIOD OF MARCH THROUGH
MAY 2011.

THE REVIEWS WILL ACTUALLY
FOR THE MOST PART INVOLVE

A RETROSPECTIVE REVIEW OF EACH
CONTRACT'S DATA REPORTED

PER THE 2010 REPORTING
REQUIREMENTS.

NOW, WE RECOGNIZE THAT THERE
ARE A HANDFUL OF MEASURES--

NOT MANY--THAT HAVE A REPORTING
SUBMISSION DATE

THAT FALLS OUTSIDE OF THIS
PERIOD.

SOME WILL ACTUALLY FALL,
I BELIEVE, ON MAY 31, 2011.

FOR THOSE MEASURES, WE'RE
CONSIDERING A DELAYED

DATA VALIDATION REVIEW.

NOW, THE DATA VALIDATION REVIEW
FINDINGS WILL BE DUE TO CMS

DURING THE SUMMER OF 2011.

EACH CONTRACTOR, EACH DATA
VALIDATION CONTRACTOR WILL

COMPLETE A FINDINGS DATA
COLLECTION FORM.

EACH CONTRACTOR WILL THEN SUBMIT
THAT FORM TO CMS,

BUT THE CMS SUBMISSION WILL
ACTUALLY BE IN THE FORM

OF DATA BEING ENTERED
THROUGH OUR HPMS,

OUR HEALTH PLAN
MANAGEMENT SYSTEM.

AND WE'RE DEVELOPING A TOOL TO
DO THAT.

AND AGAIN, THAT'LL BE THE DATA
VALIDATION CONTRACTOR,

NOT THE PLAN,
ENTERING THOSE DATA.

NOW, BASED ON THE FINDINGS
SUBMITTED BY

THE DATA VALIDATION CONTRACTOR,
CMS WILL ASSIGN

EACH ORGANIZATION'S CONTRACT
A PASS OR NOT PASS DETERMINATION

IN 2011.

THE NEXT FEW SLIDES
HIGHLIGHT THE STEPS IN

THE DATA VALIDATION PROCESS THAT
A SPONSORING ORGANIZATION

SHOULD FOLLOW.

THE FIRST STEP IS ATTENDANCE AT
THE CMS SPONSOR TRAINING.

AND, AGAIN, THIS IS LIKELY
TO BE A WEBINAR

AND NOT LIKELY TO INVOLVE, YOU KNOW,
TRAVEL OR A CONFERENCE.

BASED ON THE TRAINING AND
THE DOCUMENT STANDARD

FOR SELECTING DATA VALIDATION
CONTRACTORS,

SPONSORING ORGANIZATIONS WILL
BE ABLE TO SELECT

THE CONTRACTOR.

SO THEY'LL HAVE BOTH TRAINING,
AND THEY WILL GET A DOCUMENT

THAT WILL HELP THEM TO SELECT
A DATA VALIDATION CONTRACTOR.

SPONSORING ORGANIZATIONS MUST
REVIEW

THE "MANUAL OF DATA VALIDATION
STANDARDS AND PROCEDURES"

AND FOLLOW THE PROCESSES
OUTLINED IN THE DOCUMENT.

ORGANIZATIONS CAN WORK TO
COMPLETE

THE ORGANIZATIONAL ASSESSMENT
INSTRUMENT AND PROVIDE

ANY DOCUMENTATION ON ITS
PROCESSES

TO ITS SELECTED DATA VALIDATION
CONTRACTOR AS SPECIFIED.

THE ORGANIZATION WILL ALSO WORK

WITH THE DATA VALIDATION
CONTRACTOR TO PULL SAMPLE DATA

DURING THE DATA VALIDATION
PROCESS.

THE CONTRACTOR WILL ASSESS

ALL THE INFORMATION COLLECTED

AGAINST THE DATA VALIDATION
STANDARDS.

THE CONTRACTOR WILL REVIEW

THE PRELIMINARY DATA VALIDATION
FINDINGS

WITH THE ORGANIZATIONS
PRIOR TO SUBMITTING

THE DATA RESULTS TO CMS.

Part 3

DATA VALIDATION PROCESS

AND DATA VALIDATION
CONTRACTORS.

INTERESTED CONTRACTORS AND
AUDITORS WILL BE EXPECTED,

AS WE'VE MENTIONED, TO
PARTICIPATE IN THE TRAINING

IN THE FALL.

THE CONTRACTORS WILL
BE EXPECTED TO REVIEW

"THE MANUAL

OF DATA VALIDATION
STANDARDS AND PROCEDURES."

ORGANIZATIONS WILL THEN
ESTABLISH CONTRACTS

WITH THEIR SELECTED DATA
VALIDATION CONTRACTOR

AND PROVIDE
THE CONTRACTOR WITH

A COMPLETED ORGANIZATIONAL
ASSESSMENT INSTRUMENT.

THE CONTRACTOR WILL
CONDUCT AN ON-SITE REVIEW,

AS I'VE MENTIONED,
SOMETIME

DURING THE MARCH/MAY
TIME FRAME IN 2011.

THE DATA VALIDATION
CONTRACTOR WILL DETERMINE

IF AN ORGANIZATION IS
IN COMPLIANCE

WITH EACH OF THE DATA
VALIDATION STANDARDS.

AND THE CONTRACTOR
WILL RECORD ITS FINDINGS

IN THE FINDINGS
DATA COLLECTION FORM.

ONCE THESE FINDINGS
HAVE BEEN RECORDED,

THE CONTRACTOR

WILL SIT DOWN WITH THE
ORGANIZATION AND PROVIDE

THAT ORGANIZATION
WITH AN OVERVIEW

OF THE PRELIMINARY
FINDINGS.

THE FINDINGS WILL THEN BE
SUBMITTED BY THE CONTRACTOR

TO CMS VIA THE HEALTH PLAN
MANAGEMENT SYSTEM.

NOW AT THIS POINT
CMS WILL ASSIGN

A "PASS" OR
"NOT PASS" DETERMINATION.

AND LET'S TAKE
ANOTHER LOOK AT

SOME OF THE DATA
VALIDATION DOCUMENTS

THAT I'VE MENTIONED.

RIGHT THERE IS

THE ORGANIZATIONAL
ASSESSMENT INSTRUMENT.

IT'S A TOOL FOR THE DATA
VALIDATION CONTRACTORS

TO UNDERSTAND THE SPONSORING
ORGANIZATION'S

PROCEDURES AND PROCESSES,

AND SPECIFICALLY
THOSE PROCESSES RELATED

TO COMPILING, VALIDATING,
STORING, REPORTING,

AND AGGREGATING DATA.

RESPONSES TO THIS INSTRUMENT
WILL ALLOW THE CONTRACTORS

TO REVIEW THE MATERIAL
AND PREPARE QUESTIONS

SO THAT THE ON-LINE REVIEW
IS MORE EFFICIENT.

THE DATA VALIDATION
STANDARDS.

THIS IS THE CORE OF WHAT
THIS IS ALL ABOUT.

THIS IS A TOOL FOR THE DATA
VALIDATION CONTRACTORS

TO USE
IN DETERMINING WHETHER

THE SPONSORING
ORGANIZATION'S

REPORTED DATA ARE ACCURATE,
VALID, AND RELIABLE.

THE DOCUMENT CONTAINS
GENERAL STANDARDS

AND MEASURE-SPECIFIC
CRITERIA.

THE VALIDATION STANDARDS ARE
IDENTICAL FOR EACH MEASURE.

MEASURE-SPECIFIC CRITERIA
ARE BASED ON PARTS C AND D

REPORTING REQUIREMENTS
TECHNICAL SPECIFICATIONS.

SAMPLING INSTRUCTIONS.

THE SAMPLING INSTRUCTIONS
ARE A TOOL

THAT WILL HELP GUIDE

THE DATA VALIDATION
CONTRACTORS

IN DRAWING AND EVALUATING

DATA SAMPLES FOR
THE REPORTED MEASURES.

SAMPLED DATA WILL EVALUATE
ITEMS SUCH AS DATE RANGES,

DATA EXCLUSIONS/INCLUSIONS,
VALUES OF DATA,

AND MISSING VALUES.

THE FINDINGS DATA
COLLECTION FORM.

NOW, THIS IS,
AS YOU'LL SEE

ONCE YOU TUNE IN
TO THE CMS LINK

AND OPEN UP THIS DOCUMENT--

IT'S A PRETTY
EXTENSIVE DOCUMENT.

IT'S THE MOST COMPLEX OF
THE DOCUMENTS THAT HAS GONE

THROUGH THIS PRA PROCESS--

THIS TOOL MIRRORS
THE CONTENT

OF THE DATA VALIDATION
STANDARDS

AND ALLOWS FOR CONTRACTORS
TO RECORD NOTES,

DATA SOURCES, AND
FINDINGS FOR EACH MEASURE.

FINDINGS WILL ADDRESS
TWO ASPECTS

OF THE SPONSORING
ORGANIZATION'S

PROCESSES AND OUTCOMES.

ARE THE PROCESSES
ADEQUATELY IN PLACE

FOR ACCURATE
AND VALID RESULTS?

AND ARE THE RESULTS
THEMSELVES ACCURATE?

SO IT'S LOOKING AT BOTH
PROCESSES AND RESULTS.

A FOURTH TOOL IS THE
INTERVIEW DISCUSSION GUIDE.

AND THIS IS ACTUALLY
I DON'T BELIEVE

PART OF THE PRA PACKAGE,

BUT IT'S PART OF THE SUPPORT
DOCUMENTS THAT ARE USED

IN THE DATA VALIDATION.

THIS IS A SUPPLEMENT

TO THE ORGANIZATIONAL
ASSESSMENT INSTRUMENT,

WHICH SHOULD FACILITATE
DISCUSSION

DURING ON-SITE REVIEWS,
AND IT INCLUDES

THE GENERAL PROCESS AND
MEASURE-SPECIFIC QUESTIONS

FOR THE ORGANIZATION.

AND FINALLY WE HAVE
THE STANDARDS FOR SELECTING

A DATA VALIDATION
CONTRACTOR.

AND THIS DOCUMENT
OUTLINES

THE--I SHOULD
SAY--QUALIFICATIONS.

"MINIMUM" IS
A QUESTIONABLE WORD HERE.

BUT IT OUTLINES
THE QUALIFICATIONS,

CREDENTIALS,
AND RESOURCES

THAT CONTRACTORS MUST
POSSESS IN ORDER TO ENSURE

THAT THE REVIEWS
ARE EFFECTIVE

AND CONSISTENTLY
PERFORMED.

FINALLY, "THE MANUAL

OF THE DATA VALIDATION
STANDARDS AND PROCEDURES."

AND THIS IS A TOOL
THAT INCLUDES

THE STANDARDS
AND PROCEDURES

THAT CMS REQUIRES
TO BE FOLLOWED

FOR THE DATA VALIDATION
REVIEWS.

WE STILL HAVE A NUMBER
OF OUTSTANDING ISSUES

TO BE ADDRESSED.

FIRST, AND
CERTAINLY NOT LEAST,

IS THE DATA VALIDATION
REVIEWS OF DATA

THAT ARE PROVIDED BY
PBMS AND DELEGATED ENTITIES.

WE WANT TO MINIMIZE
THE BURDEN AND DUPLICATION

IN PERFORMING

DATA VALIDATION REVIEWS
TO THE EXTENT POSSIBLE.

AND WE SEE THIS AS
A MEANS OF DOING THAT.

THE SECOND OUTSTANDING
ISSUE IS

WHETHER WE'LL HAVE
ON-SITE

OR REMOTE DATA REVIEWS,
AND THIS IS AN ISSUE,

PARTICULARLY
IN THE SITUATION

WHEN AN ORGANIZATION'S
DATA GATHERING

AND STORAGE DEVICES ARE
AT DIFFERENT LOCATIONS,

DIFFERENT
GEOGRAPHIC LOCATIONS.

THE THIRD ISSUE
WE'VE GOT TO DEAL WITH

IS THE SCORING OF OUR
DATA VALIDATION RESULTS

AND SETTING
THE THRESHOLDS

FOR PASS AND NOT PASS.

CMS IS DEVELOPING
THE SCORING LOGIC,

WORKING WITH BOOZ ALLEN
HAMILTON ON THIS.

AND WE WILL SHARE THIS
WITH THE INDUSTRY

WHEN IT'S FINALIZED.

FOURTH--WE'RE REVIEWING
THE CONSEQUENCES

OF RECEIVING
A "NOT PASS."

AND CMS WILL DETERMINE
THESE CONSEQUENCES

AND WILL SHARE THESE
WITH THE ORGANIZATION,

WITH YOU ALL WHEN
THIS IS COMPLETED.

NOW, THIS PRETTY MUCH WRAPS
UP TODAY'S PRESENTATION.

THERE'LL BE A SECOND
PRESENTATION TOMORROW.

BUT THAT'S NOT GOING TO BE
MERELY A REHASH OF THIS,

ALTHOUGH WE MIGHT
HAVE A BRIEF REVIEW

OF WHAT WE'VE SAID TODAY.

BUT IT'S DESIGNED MAINLY TO
ADDRESS YOUR QUESTIONS.

SO I HOPE YOU'LL
SPEND SOME TIME

AFTER THIS PRESENTATION

AND THINK
ABOUT ANY QUESTIONS

THAT YOU MIGHT HAVE.

THE BEST WAY TO HANDLE
THAT WOULD BE TO COMPLETE

THE NOTE CARDS IN THE BACK
AND SUBMIT THOSE QUESTIONS.

WE WILL BE WORKING
ON THOSE QUESTIONS

BEFORE THE PRESENTATION
TOMORROW, WHICH IS--

I BELIEVE--AT 11 A.M.

AND IF WE HAVE
A LITTLE BIT OF TIME--

AND I'M NOT SURE
HOW MUCH TIME WE HAVE--

WE CAN
REVIEW JUST A COUPLE--

MAYBE TAKE A COUPLE MINUTES
TO REVIEW ANY QUESTIONS

THAT YOU MIGHT HAVE.

OR MAYBE YOU'RE READY
TO TAKE A BREAK.

I'M FLO OSTERBAUER
FROM CIGNA HealthCare.

THE QUESTION IS,
WILL THE DATA VALIDATION RESULTS, THE PASS OR FAIL,

BE COMMUNICATED
TO THE PUBLIC?

AND IF SO, HOW?

I THINK THAT WE HAVE NOT
MADE A DECISION ON THAT YET.

OK.

THAT'S SOMETHING THAT'S
STILL UNDER REVIEW.

OK. THANK YOU.