



**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.