

Part C and Part D coverage determination timeliness monitoring

On November 28, 2016, the Centers for Medicare & Medicaid Services (CMS) introduced a brand new, industry-wide monitoring project for timeliness of Part C organization determinations and reconsiderations and Part D coverage determinations and redeterminations.

Beginning in December 2016, CMS will collect various ODAG and CDAG audit universes from each contract to assess all sponsors' timeliness in processing both Part C and D requests, as well as sponsor compliance with forwarding cases to the IRE. The request will be retrospective, requesting 2016 data.¹

¹ CMS Memo: Industry-wide Appeals Timeliness Monitoring (November 28, 2016)
ODAG: Organization Determinations, Appeals, Grievances
CDAG: Coverage Determinations, Appeals, Grievances

CMS alluded to the monitoring project within the re-release of the 2017 program audit protocols, but left little relative good news and more relative bad news. CMS provided additional clarifications regarding the monitoring project on Friday, December 2, which delivers plan sponsors with more good news than the initial memo.

Relative bad news

- If the plans have not been audited in the past three years, this is coming and is tied directly with four Star measures.
- CMS is beginning the collection of universes in January 2017, right in the middle of 1/1-implementation activities. CMS estimates each plan sponsor will need 120 hours to generate and submit all required universes. That's more than half of the month January!

Relative good news

- CMS will not request universes until January 9, 2017. Only designated secure file transfer protocol (SFTP) contacts are required by December 7, 2016.
- Sponsors audited in 2016 are excluded from this request if Part D coverage determinations, appeals and grievances (CDAG) and Part C organization determinations, appeals and grievances (ODAG) universes were submitted with at least one month of 2016 data for each of the layouts and without receiving any invalid data submission (IDS) conditions.
- Universe date ranges have been provided and will not cross plan years (February–April 2016).
- The initial memo and follow-up clarifications define the process and specific vendors being utilized by CMS for this effort.

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- CMS is utilizing the 2016 CDAG and ODAG program audit layouts, which are exponentially more complex compared to the audit protocols of the past.
- Note: For this monitoring effort, CMS is only allowing two (2) attempts to pass this data universe validation.
- Plan sponsors are required to participate in a validation webinar, comparing data from the universe against the source system(s) in real time. This will require extensive coordination activities between plan sponsors and vendors.
- Findings may result in compliance actions and will have implications on Star ratings for the four appeals measures. Contracts with data integrity issues are issued one Star for each measure, which is factored into the summary score.

Contact your client service representative for more information.

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