

HPMS E-Mail

Date: December 02, 2016

Subject: November 28, 2016, Industry-wide Appeals Timeliness Monitoring Memo

We have received several concerns from the industry about the data submission for the Industry-wide Appeals Timeliness Monitoring effort. CMS reminds Medicare Advantage Organizations and Part D plans that this monitoring effort will provide all Sponsors the ability to demonstrate their Independent Review Entity (IRE) data are accurate and valid for use in CMS' Star Ratings. Sponsors have agreed with CMS that the Star Rating appeal measures are important indicators of beneficiary access, and that data integrity must be protected due to the importance of the Star Ratings and the associated Quality Bonus Payments. We are undertaking this large scale monitoring project in response to some Sponsors' concerns that our targeted reviews that accompany program audits do not sufficiently assess all contracts. We appreciate Sponsors' continued support and engagement in improving compliance to Part C and D requirements, and CMS quality measurement programs.

CMS has made several changes to the process to assist plans in completing this data request.

First, instead of the timing indicated in the Monitoring memo, CMS will not begin the request for data until January 9, 2017. However, Sponsors must still submit a designated SFTP contact to CMSProgramAudits@mslc.com by December 7, 2016. Only one individual per organization will be granted access to the SFTP.

Second, Sponsors are reminded that this data request is similar to the collection for the program audits. That is, the universe submissions should include data processed in-house and by all First Tier Down-stream and Related entities (FDRs) on their behalf. All universes will be submitted at the Parent Organization level, based on total enrollment across all contracts as of the end of November 2016; therefore, one universe submission may include data for multiple contracts. The time period of data that will be requested is February - April 2016. Organizations with enrollment over 250,000 beneficiaries will submit one month of data, in this case, the month of February. Organizations with enrollment of 50,000 to 250,000 will submit data for February and March. Organizations with enrollment of less than 50,000 will submit data for February, March, and April. During this period of transition to an annual data submission, Sponsors who were audited in 2016 do not need to submit data for this request if they successfully submitted the CDAG and ODAG universes specified in the HPMS memo without any Invalid

Data Submission (IDS) conditions and had at least one month of 2016 data for each of these universes. Sponsors can refer to their preliminary draft audit report for any IDS conditions.

Third, we are clarifying that only those organizations with active contracts in both CY 2016 and CY 2017 will be subject to this monitoring effort. In addition, all PACE, Medicare-Medicaid Plan (MMP), MSA, Employer/Union Only Direct and 1833 Cost contracts are excluded from this data submission.