

2018 DV 30-Day Comment Response Document

Overview of Comments

CMS received four comments after the comment period from a Data Validation organization regarding Coverage Determinations and Redeterminations, Organization Determinations and Records, and Special Needs Plans.

Detailed Summary of Comments

Section	Comment	Commenter's Recommendation
OD/RC	FDCF and Appendix B 2e, RSC-5.j and Standard 5.j in Appendix B 5.j Data Integrity check states 'Verify that there is a valid value submitted for date of original disposition as MM/DD/YYYY format (Data Element 6.26). [Data Element 6.26] Typo? Date format should be MMDDYYYY	We are seeking clarification.
SNP	Appendix J FDCF FINAL_01182018.pdf 73 / 2d 2d does not have a RSC 2d is missing a RSC number. Consider adding a RSC number to 2d	We are seeking clarification.

CD/RD	<p>Appendix J FDCF 3 CDR Measure Draft FDCF contains duplicate language related to pharmacy transactions in both 2.e, RSC-5.e & 2.e, RSC-5f. We believe Standard 2.e, RSC-5.f: The following numbers do not exceed the total number of pharmacy transactions rejected (Data Element 2.A) is intended for Coverage Determinations. To align with the Medicare Part C and Part D Reporting Requirements Data Validation Procedure Manual Appendix B: Data Validation Standards, suggest an update to the final Appendix J FDCF, Standard 2.e, RSC-5.f to state: The following numbers do not exceed the total number of coverage determinations including exceptions (Data Element 2.A).</p>	We are seeking clarification.
CD/RD	<p>Appendix J FDCF 12 CDR Measure Draft FDCF DV Standard 2.e, RSC-17.j states: Verify that redetermination requests that are withdrawn or dismissed are not included in the count of total redeterminations. [Data Element 3.A] but it contradicts with DV Standard 2.e, RSC-5.g which states the following: Number of redeterminations by outcome (Data Element 3.E + Data Element 3.F + Data Element 3.G + Data Element H + Data Element I) is equal to total number of redeterminations (Data Element 3.A). To align with the Medicare Part C and Part D Reporting Requirements Data Validation Procedure Manual Appendix B: Data Validation Standards, suggest an update to the final Appendix J FDCF, Standard 2.e, RSC-17.j to state: Verify that redetermination requests that are withdrawn or dismissed are not included in the count of total redeterminations. [Data Element 3.A]</p>	We are seeking clarification.

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CMS Response	Revised Documents	Revised Burden Estimates
Correction has been made.	Yes	No
Thank you for brining this to our attention. We will evaluate this for next year.	No	No

Correction has been made.	Yes	No
Correction has been made.	Yes	No