

CY 2023 DV Validation Standard / Sub-Standard	CY 2023 DV FDCF (Appendix J)	CY 2024 DV Validation Standard / Sub-Standard	CY 2024 DV EES (Appendix B)	Type of Change	Reason for Change	Burden Change
Note:	All validation standards and sub-standards have been made uniform across all Part C & D reporting sections.	N/A	N/A	Update	Consistent with current technical guidance	None
Note:	Reporting section criterion (RSCs) were removed from both the EES and DV Manual.	N/A	N/A	Update	Consistent with current technical guidance	None
1	A review of source documents (e.g., programming code, spreadsheet formulas, analysis plans, saved data queries, file layouts, process flows) indicates that all source documents accurately capture required data fields and are properly documented.	1	Database management and structure: A review of source documents (for example, programming code, spreadsheet formulas, analysis plans, saved data queries, file layouts, process flows) shows that all source documents accurately capture required data fields and the SO has properly documented them.	Update	Consistent with current technical guidance	None
1.a	Source documents are properly secured so that source documents can be retrieved at any time to validate the information submitted to CMS via HPMS.	1.a	SOs properly secured source documents and output, and have referenced data file locations correctly so that DVCs can retrieve source documents at any time to validate the information submitted to CMS via CMS systems.	Update	Consistent with current technical guidance	None
1.g	Source documents are clearly and adequately documented.	1.b	SOs clearly and adequately documented source documents.	Addition	Renumbering	None
1.b	Source documents create all required data fields for reporting requirements.	1.c	SOs accurately captured required data fields including all data fields for RR in source documents. All data fields have meaningful, consistent labels (for example, label field for patient ID as Patient ID, rather than Field1 and maintain the same field name across data sets).	Update	Consistent with current technical guidance	None
1.d	All data fields have meaningful, consistent labels (e.g., label field for patient ID as Patient ID, rather than Field1 and maintain the same field name across data sets).	1.c	SOs accurately captured required data fields including all data fields for RR in source documents. All data fields have meaningful, consistent labels (for example, label field for patient ID as Patient ID, rather than Field1 and maintain the same field name across data sets).	Update	Consistent with current technical guidance	None

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1.c	Source documents are error-free (e.g., programming code and spreadsheet formulas have no messages or warnings indicating errors, use correct fields, have appropriate data selection, etc.).	1.d	Source documents are error-free (for example, programming code and spreadsheet formulas have no messages or warnings indicating errors).	Update	Consistent with current technical guidance	None
1.i	Version control of source documents is appropriately applied.	1.e	SOs appropriately applied version control of source documents.	Update	Renumbering	None
2.a	The appropriate date range(s) for the reporting period(s) is captured.	1.f	SOs captured the appropriate date range(s) for the reporting period(s). SO reports data based on the required reporting period of 1/1 - 12/31.	Update	Consistent with current technical guidance	None
1.f	If used, macros are properly documented.	N/A	N/A	Deletion	Consistent with current technical guidance	None
2.b	Data are assigned at the applicable level (e.g., plan benefit package or contract level).	1.g	SOs assigned data at the applicable level (for example, plan benefit package (PBP) or contract level).	Update	Consistent with current technical guidance	None
1.h	Titles and footnotes on reports and tables are accurate.	N/A	N/A	Deletion	Consistent with current technical guidance	None
1.i	Version control of source documents is appropriately applied.	N/A	N/A	Deletion	Consistent with current technical guidance	None

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2	A review of source documents (e.g., programming code, spreadsheet formulas, analysis plans, saved data queries, file layouts, process flows) and census or sample data, whichever is applicable, indicates that data elements for each reporting section are accurately identified, processed, and calculated.	2	Database Extraction Function: Review of source data, preliminary data sets, and interim data sets (for example, programming code, spreadsheet formulas, analysis plans, saved data queries, file layouts, process flows) indicates the following: SOs accurately identify, process, and verify the population for each reporting section (including calculations for the number of members, claims, grievances, procedures, etc.). They apply QA checks/thresholds to detect outlier or erroneous data.	Update	Consistent with current technical guidance	None
2.a	The appropriate date range(s) for the reporting period(s) is captured.	N/A	N/A	Deletion	Consistent with current technical guidance	None
2.b	Data are assigned at the applicable level (e.g., plan benefit package or contract level).	N/A	N/A	Deletion	Consistent with current technical guidance	None
2.c	Appropriate deadlines are met for reporting data (e.g., quarterly).	N/A	N/A	Deletion	Consistent with current technical guidance	None
2.d	Terms used are properly defined per CMS regulations, guidance, Reporting Requirements and Technical Specifications.	N/A	N/A	Deletion	Consistent with current technical guidance	None

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2.e	The number of expected counts (e.g., number of members, claims, grievances, procedures) are verified; ranges of data fields are verified; all calculations (e.g., derived data fields) are verified; missing data has been properly addressed; reporting output matches corresponding source documents (e.g., programming code, saved queries, analysis plans); version control of reported data elements is appropriately applied; QA checks/thresholds are applied to detect outlier or erroneous data prior to data submission.	N/A	N/A	Deletion	Consistent with current technical guidance	None
2.e	The number of expected counts (e.g., number of members, claims, grievances, procedures) are verified; ranges of data fields are verified; all calculations (e.g., derived data fields) are verified; missing data has been properly addressed; reporting output matches corresponding source documents (e.g., programming code, saved queries, analysis plans); version control of reported data elements is appropriately applied; QA checks/thresholds are applied to detect outlier or erroneous data prior to data submission.	2.a	SOs accurately identify, process, and verify the population for each reporting section (including calculations for the number of members, claims, grievances, procedures, etc.). They apply QA checks/thresholds to detect outlier or erroneous data.	Update	Consistent with current technical guidance	None

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2.e	The number of expected counts (e.g., number of members, claims, grievances, procedures) are verified; ranges of data fields are verified; all calculations (e.g., derived data fields) are verified; missing data has been properly addressed; reporting output matches corresponding source documents (e.g., programming code, saved queries, analysis plans); version control of reported data elements is appropriately applied; QA checks/thresholds are applied to detect outlier or erroneous data prior to data submission.	3	<p>Organization implements policies and procedures in their final stage data sets for submission into HPMS, including the following:</p> <p>a. Expected counts - Data elements are valid, complete, and accurate according to the source document that SOs use to upload/enter data into the HPMS; ranges of data fields are verified; all calculations (for example, derived data fields) are verified; they properly address missing data; reporting output matches corresponding source documents (for example, programming code, saved queries, analysis plans); they appropriately apply version control of reported data elements.</p> <p>b. Organization accurately captures data by applying data integrity/logical checks; they apply QA checks/thresholds to detect outlier or erroneous data.</p>	Update	Consistent with current technical guidance	None
3.a	Data elements are accurately entered/uploaded into HPMS and entries match corresponding source documents.	3	<p>Organization implements policies and procedures in their final stage data sets for submission into HPMS, including the following:</p> <p>a. Expected counts - Data elements are valid, complete, and accurate according to the source document that SOs use to upload/enter data into the HPMS; ranges of data fields are verified; all calculations (for example, derived data fields) are verified; they properly address missing data; reporting output matches corresponding source documents (for example, programming code, saved queries, analysis plans); they appropriately apply version control of reported data elements.</p> <p>b. Organization accurately captures data by applying data integrity/logical checks; they apply QA checks/thresholds to detect outlier or erroneous data.</p>	Update	Consistent with current technical guidance	None

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3	<p>Organization implements policies and procedures for data submission, including the following:</p> <p>a. Data elements are accurately entered/uploaded into HPMS and entries match corresponding source documents. [Subsection #1, Data Elements A – G, Subsection #2, Data Elements I – L, Subsection #3, Data Elements A – G, Subsection #4, Data Elements I – L, Subsection #5, Data Elements A – B, E – O]</p> <p>b. All source, intermediate, and final stage data sets and other outputs relied upon to enter data into HPMS are archived.</p>	N/A	N/A	Deletion	Consistent with current technical guidance	None
3.a	Data elements are accurately entered/uploaded into HPMS and entries match corresponding source documents.	3.a	Expected counts - Data elements are valid, complete, and accurate according to the source document that SOs use to upload/enter data into the HPMS; ranges of data fields are verified; all calculations (for example, derived data fields) are verified; they properly address missing data; reporting output matches corresponding source documents (for example, programming code, saved queries, analysis plans); they appropriately apply version control of reported data elements.	Update	Renumbering	None
2.e	The number of expected counts (e.g., number of members, claims, grievances, procedures) are verified; ranges of data fields are verified; all calculations (e.g., derived data fields) are verified; missing data has been properly addressed; reporting output matches corresponding source documents (e.g., programming code, saved queries, analysis plans); version control of reported data elements is appropriately applied; QA checks/thresholds are applied to detect outlier or erroneous data prior to data submission.	3.b	Organization accurately captures data by applying data integrity/logical checks; they apply QA checks/thresholds to detect outlier or erroneous data.	Update	Consistent with current technical guidance	None
3.b	All source, intermediate, and final stage data sets and other outputs relied upon to enter data into HPMS are archived.	4	All source, intermediate, and final stage data sets and other outputs relied upon to enter data into CMS systems are archived.	Update	Renumbering	None

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4	Organization implements policies and procedures for periodic data system updates (e.g., changes in enrollment, provider/pharmacy status, and claims adjustments).	5	<p>Organization implements policies and procedures for the following:</p> <ul style="list-style-type: none"> i. Periodic data system updates (for example, changes in enrollment, provider/pharmacy status, and claims adjustments). ii. Restoring data in each data system (for example, disaster recovery plan). 	Update	Consistent with current technical guidance	None
5	Organization implements policies and procedures for archiving and restoring data in each data system (e.g., disaster recovery plan).	5	<p>Organization implements policies and procedures for the following:</p> <ul style="list-style-type: none"> i. Periodic data system updates (for example, changes in enrollment, provider/pharmacy status, and claims adjustments). ii. Restoring data in each data system (for example, disaster recovery plan). 	Update	Consistent with current technical guidance	None
6	If organization's data systems underwent any changes during the reporting period (e.g., because of a merger, acquisition, or upgrade): Organization provided documentation on the data system changes and, upon review, there were no issues that adversely impacted data reported.	6	If organization's data systems underwent any changes during the reporting period for example, because of a merger, acquisition, vendor change or upgrade: Organization provided documentation on the data system changes and, upon review, changes were implemented correctly and did not adversely impact the reported data.	Update	Consistent with current technical guidance	None

CY 2023 DV Appendix E	CY 2024 DV Appendix E	Type of Change	Reason for Change	Burden Change
Location: Table 1, Step 4, Timeline Early April (allow for up to 1 week)	Location: Table 1, Step 4, Timeline Early April	Update	Consistent with current technical guidance	None
Location: Table 5 Coverage Determinations and Redeterminations	Location: Table 5 Coverage Determinations, Redeterminations, (including At-Risk Redeterminations Under a Drug Management Program), and Reopenings	Update	Consistent with current technical guidance	None

CY 2023 DV Manual	CY 2024 DV Manual	Type of Change	Reason for Change	Burden Change
2.1. Part C and Part D Reporting Sections Requiring Data Validation in 2023	2.1. Parts C and D Reporting Sections Requiring DV	Update	Consistent with current technical guidance	None
2.2. Reporting Requirements Excluded from the Validation Requirement	2.2. Reporting Sections Excluded from the DV Requirement	Update	Consistent with current technical guidance	None
3.2.2.1.	3.2.2.1. Process for Obtaining HPMS Access for SOs and DVCs	Update	Consistent with current technical guidance	None
None	3.2.2.2. Process for SOs	Addition	Consistent with current technical guidance	None
None	3.2.2.3.1. HPMS PRDVM Access	Addition	Consistent with current technical guidance	None
None	3.2.2.3.2. Instructions for Requesting Plan Access via EFI	Addition	Consistent with current technical guidance	None
None	3.2.2.3.3. Existing CMS Enterprise User Administration (EUA) User IDs and HPMS Access	Addition	Consistent with current technical guidance	None
None	3.2.2.3.4. Submission of Findings to CMS: Annual DV Review	Addition	Consistent with current technical guidance	None
3.4.1. Introduction to the Data Validation Standards	3.4.1. Introduction to the EES	Update	Consistent with current technical guidance	None
3.4.2. Data Validation Standards and Reporting Section Criteria	3.4.2. EES (Appendix B)	Update	Consistent with current technical guidance	None
3.4.3. Reporting Section Criteria	Deleted	Deletion	Consistent with current technical guidance	None
4.4. Conduct On-Site or Virtual Visit	4.4. Conduct Site Visit	Update	Consistent with current technical guidance	None
4.4.4. Extract Census or Sample Data	Deleted	Deletion	Consistent with current technical guidance	None

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4.4.5. Conduct Exit Conference	4.4.4. Conduct Exit Conference	Update	Renumbering due to deletion	None
5.1 Determine Compliance with Data Validation Standards and Record Findings in the Findings Data Collection Form (FDCF) (Appendix J) to Upload into the HPMS PRDVM	5.1. Reporting DV Results: How to Determine Scoring	Update	Consistent with current technical guidance	None
5.1.1. Reporting Findings for Standards Using Binary Scale	Deleted	Deletion	Consistent with current technical guidance	None
5.1.2. Reporting Findings for Standards Using Likert Scale	Deleted	Deletion	Consistent with current technical guidance	None
5.1.3. Review of the Findings Data Collection Form	Deleted	Deletion	Consistent with current technical guidance	None
5.1.4. Guidance for Interpreting Standards and Making a Findings Determination	Deleted	Deletion	Consistent with current technical guidance	None
5.2. Provide Draft Findings to Sponsoring Organization	5.2. The EES	Update	Consistent with current technical guidance	None
None	5.2.1. Reporting Findings for Standards Using Binary Scale	Addition	Renumbering due to deletion	None
None	5.2.2. Reporting Findings for Standards Using Likert Scale	Addition	Renumbering due to deletion	None
None	5.2.3. Guidance for Interpreting Standards and Making a Findings Determination from Review of the EES	Addition	Renumbering due to deletion	None
None	5.2.3.1. Standard 1	Addition	Consistent with current technical guidance	None
None	5.2.3.2. Standard 2	Addition	Consistent with current technical guidance	None
None	5.2.3.3. Standard 3	Addition	Consistent with current technical guidance	None
None	5.2.3.4. Standards 4-7	Addition	Consistent with current technical guidance	None

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5.3. Review Draft Findings with Sponsoring Organization and Obtain Additional Documentation Necessary to Resolve Issues	5.3. Submit DV Review Findings via HPMS PRDVM	Update	Renumbering due to deletion	None
None	5.3.1. Review Draft Findings with Sponsoring Organization	Addition	Renumbering due to deletion	None
None	5.3.2. Submit DV Review Findings via HPMS PRSVM	Addition	Renumbering due to deletion	None
5.4. Submit Data Validation Review Findings via HPMS PRDVM	Deleted	Deletion	Consistent with current technical guidance	None
5.4.1. Data Validation Contractor's Submission of Findings	Deleted	Deletion	Consistent with current technical guidance	None
5.4.2. Sponsoring Organization Disagreement with Findings	Deleted	Deletion	Consistent with current technical guidance	None
6.2. Receive Pass or Not Pass Threshold Level and Assess Pass or Not Pass Determination based on Final Scores	6.2. Review Final DV Results	Update	Consistent with current technical guidance	None
6.3. Sponsoring Organization Appeal of Data Validation	6.2.3. SO Appeal of DV Determination	Update	Renumbering due to deletion	None
None	Glossary of Terms	Addition	Consistent with current technical guidance	None
None	EXHIBIT 4. PART C AND PART D REPORTING SECTIONS EXCLUDED FROM DV	Addition	Consistent with current technical guidance	None
EXHIBIT 5. PART C AND PART D REPORTING SECTIONS EXCLUDED FROM DATA VALIDATION	EXHIBIT 5. STANDARD 1: REQUIRED DATA FIELDS ARE ACCURATELY CAPTURED AND PROPERLY DOCUMENTED <input type="checkbox"/>	Update	Consistent with current technical guidance	None
EXHIBIT 6. GENERAL INSTRUCTIONS FOR DATA VALIDATION STANDARDS	EXHIBIT 6. EXAMPLES OF CALCULATIONS TO DETERMINE MINIMUM THRESHOLD OF CORRECT SAMPLE/CENSUS RECORDS FOR "YES" FINDING	Addition	Consistent with current technical guidance	None
EXHIBIT 7. STANDARD 1: REQUIRED DATA FIELDS ARE ACCURATELY CAPTURED AND PROPERLY DOCUMENTED	EXHIBIT 7. EXAMPLE OF HOW TO DETERMINE MINIMUM THRESHOLD OF IMPLEMENTED POLICIES OR PROCEDURES FOR "YES" FINDING	Addition	Consistent with current technical guidance	None

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EXHIBIT 8. STANDARD 2: DATA ELEMENTS ARE ACCURATELY IDENTIFIED, PROCESSED, AND CALCULATED	EXHIBIT 8. EXAMPLE OF HOW TO DETERMINE MINIMUM THRESHOLD OF IMPLEMENTED POLICIES OR PROCEDURES FOR FINDINGS USING BINARY AND LIKERT SCORE.	Addition	Consistent with current technical guidance	None
EXHIBIT 9. STANDARD 3: DATA SUBMISSION	EXHIBIT 9. EXAMPLE ROWS FROM EES (APPENDIX B) AND GUIDANCE FOR STANDARD 1	Addition	Consistent with current technical guidance	None
EXHIBIT 10. STANDARDS 4 AND 5: DATA SYSTEM UPDATES AND ARCHIVE/RESTORATION	EXHIBIT 10. EXAMPLE OF THE EES (APPENDIX B) AND GUIDANCE FOR STANDARD 2, SUB-STANDARDS 2.a.	Addition	Consistent with current technical guidance	None
EXHIBIT 11. STANDARDS 6 AND 7: DATA SYSTEM CHANGES AND OVERSIGHT OF DELEGATED ENTITY REPORTING	EXHIBIT 11. EXAMPLE ROWS FROM EES (APPENDIX B) FOR STANDARD 3	Addition	Consistent with current technical guidance	None
EXHIBIT 12. REPORTING SECTION CRITERIA FOR APPROPRIATE REPORTING PERIOD, REPORTING LEVEL, AND REPORTING DEADLINE IN PART C SPECIAL NEEDS PLANS (SNPs) CARE MANAGEMENT	EXHIBIT 12. EXAMPLE ROWS FROM EES (APPENDIX B) FOR STANDARDS 4 THROUGH 7	Addition	Consistent with current technical guidance	None
EXHIBIT 13. REPORTING SECTION CRITERION FOR DEFINING KEY TERMS IN PART D COVERAGE DETERMINATIONS AND REDETERMINATIONS SECTION	EXHIBIT 13. MINIMUM DOCUMENTATION REQUIRED FOR DV ARCHIVE	Addition	Consistent with current technical guidance	None
EXHIBIT 14. REPORTING SECTION CRITERIA FOR SELECTED PART C GRIEVANCES DATA ELEMENTS	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 15. EXAMPLES OF CALCULATIONS TO DETERMINE MINIMUM THRESHOLD OF CORRECT SAMPLE/CENSUS RECORDS FOR "YES" FINDING	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 16. EXAMPLE OF HOW TO DETERMINE MINIMUM THRESHOLD OF IMPLEMENTED POLICIES OR PROCEDURES FOR "YES" FINDING	Deleted	Deletion	Consistent with current technical guidance	Reduce burden

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EXHIBIT 17. EXAMPLE OF HOW TO DETERMINE MINIMUM THRESHOLD OF IMPLEMENTED POLICIES OR PROCEDURES FOR FINDINGS USING BINARY AND LIKERT SCORE.	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 18. EXAMPLE ROWS FROM FDCF (APPENDIX J) FOR STANDARD 1	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 19. EXAMPLE OF THE FDCF (APPENDIX J) FOR STANDARD 2, SUB-STANDARDS 2.A - 2.D. FOR THE PART D GRIEVANCES REPORTING SECTION	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 20. EXAMPLE ROWS FROM FDCF (APPENDIX J) FOR STANDARD 2, SUB-STANDARD 2.E RSC-5 FOR PART D GRIEVANCES REPORTING SECTION	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 21. EXAMPLE ROWS FROM FDCF (APPENDIX J) FOR STANDARD 3 FOR PART D GRIEVANCES REPORTING SECTION	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 22. EXAMPLE ROWS FROM FDCF (APPENDIX J) FOR STANDARDS 4 THROUGH 7	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 23. GUIDANCE FOR DATA VALIDATION STANDARD 1	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 24. GUIDANCE FOR DATA VALIDATION STANDARD 2	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 25. GUIDANCE FOR DATA VALIDATION STANDARD 3	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 26. GUIDANCE FOR DATA VALIDATION STANDARD 4	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 27. GUIDANCE FOR DATA VALIDATION STANDARD 5	Deleted	Deletion	Consistent with current technical guidance	Reduce burden

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EXHIBIT 28. GUIDANCE FOR DATA VALIDATION STANDARD 6	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 29. GUIDANCE FOR DATA VALIDATION STANDARD 7	Deleted	Deletion	Consistent with current technical guidance	Reduce burden
EXHIBIT 30. MINIMUM DOCUMENTATION REQUIRED FOR DATA VALIDATION ARCHIVE	Deleted	Deletion	Consistent with current technical guidance	Reduce burden