

Comment on CMS Qualified Entity Certification Program (CMS–10394)

Overview

We support CMS's continued advancement of the Qualified Entity Certification Program and its role in expanding access to standardized data for performance measurement.

As CMS continues to strengthen downstream analytics and program integrity capabilities, there is also an opportunity to address a related issue upstream: ensuring that the administrative information used across programs is sufficiently reliable before it is used for measurement, oversight, or payment.

Observation

In practice, inconsistencies in how service locations and responsible entities are represented can persist across administrative processes.

If these inconsistencies are not addressed early, they carry forward into downstream analytics and program integrity efforts, where they are harder to resolve.

Recommendation

We recommend that CMS incorporate targeted pre-enrollment validation as part of its broader program integrity strategy.

Program integrity begins prior to enrollment and before payment - not after.

Why This Matters

Performance measurement and oversight depend on the reliability of the underlying administrative information. Strengthening validation at the point of entry improves the quality of downstream measurement and supports stronger program integrity without major structural changes.

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