



CENTER FOR MEDICARE

DATE: September 22, 2023

TO: All Prescription Drug Plan Sponsors and Medicare Advantage Organizations (MAOs) and Medicare-Medicaid Plans (MMPs)

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SUBJECT: Results of the 2023 Part C and D Reporting Requirements Data Validation

Organizations contracted to offer Medicare Part C and/or Part D benefits are required to submit data to the Centers for Medicare and Medicaid Services (CMS) per the Medicare Part C and D Reporting Requirements.^{1,2} The data are subject to validation through an independent yearly review in order to ensure they are reliable, valid, complete, comparable, and timely.³ The data validation reviews of contract year (CY) 2022 Medicare Part C and D data were conducted between April 1, 2023 and June 30, 2023, and this memorandum summarizes the results of those reviews.

A total of 798 contracts completed data validation. Validation was conducted for 710 Medicare Advantage (MA) Prescription Drug Plans (MA-PDs), 5 MA-only contracts, 55 Prescription Drug Plans (PDPs) and 28 Medicare-Medicaid Plans (MMPs). Tables 1 and 2 below contain a statistical summary of the data validation scores.

Table 1: Statistical Summary of Data Validation Scores by Organization Type*

Organization Type	No. Contracts	Minimum Score	Maximum Score	Mean Score	Standard Deviation
MA only	5	99.6%	100.0%	99.8%	0.2%
PDP	55	95.7%	100.0%	99.8%	0.7%
MA-PD	710	86.6%	100.0%	99.8%	0.7%
MMP	28	99.9%	100.0%	100.0%	0.1%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in July 2023.

¹ Part C Reporting Requirements can be found at: <https://www.cms.gov/Medicare/Health-Plans/HealthPlansGenInfo/ReportingRequirements>

² Part D Reporting Requirements can be found at: https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/RxContracting_ReportingOversight

³ Part C and D Reporting Requirements Data Validation materials can be found at: <https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/PartCDDDataValidation>

Table 2: Statistical Summary of Overall Data Validation Scores *

DV Score	No. Contracts	Minimum Score	Maximum Score	Mean Score	Standard Deviation
Overall Part C	715	88.9%	100.0%	99.8%	0.6%
Overall Part D	793	77.3%	100.0%	99.8%	1.0%
Overall Combined Part C and D	798	86.6%	100.0%	99.8%	0.7%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in July 2023.

*Overall combined Part C and D Data Validation scores include MA-PDs, Part C for MA only contracts, and Part D for PDPs.

*Overall Part C, Part D, and Combined Part C and D Data Validation scores include MMP contracts.

Table 3 presents the distribution of the overall combined data validation scores. A total of 2 contracts (0.25%) scored below 95% (rounded to the nearest whole number). This is the same number of contracts that scored less than 95% in the CY2022 DV cycle.

Table 3: Distribution of Overall Combined Part C and D Data Validation Scores*

Overall Score	No. Contracts	Percent of Total Contracts (%)	Cumulative Percent of Total Contracts (%)
87%	1	0.13	0.13
94%	1	0.13	0.25
96%	2	0.25	0.50
97%	5	0.63	1.13
98%	18	2.26	3.38
99%	39	4.89	8.27
100%	732	91.73	100.00
Total	798		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in July 2023. Scores rounded to nearest whole percent.

*Overall combined Part C and D Data Validation scores include MA-PDs, Part C for MA only contracts, and Part D for PDPs.

Table 4 displays the distribution of the overall Part C data validation scores. Out of 715 contracts, 1 (0.14%) scored below 95%.

Table 4: Distribution of Part C Data Validation Scores*

Overall Score	No. Contracts	Percent of Total Contracts (%)	Cumulative Percent of Total Contracts (%)
89%	1	0.14	0.14
96%	3	0.42	0.56
97%	4	0.56	1.12
98%	17	2.38	3.50
99%	26	3.64	7.13
100%	664	92.87	100.00
Total	715		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in July 2023. Scores rounded to nearest whole percent.

Table 5 contains the distribution of the overall Part D data validation scores. Out of 793 contracts, 2 (0.25%) scored below 95%.

Table 5: Distribution of Part D Data Validation Scores*

Overall Score	No. Contracts	Percent of Total Contracts	Cumulative Percent of Total Contracts
77%	1	0.13	0.13
93%	1	0.13	0.25
95%	1	0.13	0.38
96%	9	1.13	1.51
97%	10	1.26	2.77
98%	6	0.76	3.53
99%	19	2.40	5.93
100%	746	94.07	100.00
Total	793		

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in July 2023. Scores rounded to nearest whole percent.

Table 6 displays a statistical summary of the data validation scores by reporting section. Part D Medication Therapy Management had the highest mean score (99.99%) and Improving Drug Utilization Review Controls had the lowest mean score (99.62%).

Table 6: Statistical Summary of 2023 Reporting Section Data Validation Scores*

Reporting Section	No. of Contracts Validated	Minimum Score	Maximum Score	Mean Score	Standard Deviation
Part C:					
Grievances	715	93%	100%	99.93%	0.56%
Organization Determinations & Redeterminations	715	85%	100%	99.78%	1.01%
Special Needs Plan Care Management	375	92%	100%	99.87%	0.74%
Part D:					
Coverage Determinations & Redeterminations	793	71%	100%	99.83%	1.33%
Grievances	793	79%	100%	99.83%	1.45%
Medication Therapy Management Programs	774	96%	100%	99.99%	0.18%
Improving Drug Utilization Review Control	793	47%	100%	99.62%	2.74%

*Data Source: HPMS Plan Reporting Data Validation Module. Data tabulated in July 2023.

A total of 3 unique contracts (0.38%) scored below 95% for overall average and/or below 95% for Part C average, and/or below 95% for Part D average, and/or below 95% on all three scores.

Sponsors may view their individual contracts' 2023 data validation results in HPMS. Go to HPMS (<https://hpms.cms.gov>). Then navigate to Monitoring, followed by Plan Reporting Data Validation, choose CY 2022 (DV period April 2023 – June 2023), and then PRDVM Reports. Please submit any questions or comments to the dedicated CMS Part C and D data validation resource mailbox at PartCandD_Data_Validation@cms.hhs.gov.