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DATE: April 11, 2024

TO: All Medicare Advantage Organizations, Prescription Drug Plans, and Section 1876 Cost Plans

FROM: Vanessa S. Duran
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SUBJECT: Information to Review Data Used for Medicare Part C and D Star Ratings and Display Measures

The purpose of this memo is to remind sponsors of the various datasets and reports available to review their underlying measure data that are the basis for the Part C and D Star Ratings and display measures. Please alert CMS of potential errors or anomalies in advance of CMS's plan preview periods to allow sufficient time to investigate and resolve them before the release of the Star Ratings.

The pages that follow provide information about the available datasets and reports for ongoing review. Many of the datasets are posted in HPMS, under "Quality and Performance," then "Performance Metrics." In many cases, these datasets provide more detailed information than what is used for CMS's Star Ratings and display measures.

In addition, previous years' Star Ratings and Display Measure Technical Notes and data can be found at <http://go.cms.gov/partcanddstarratings>. The Technical Notes provide detailed information about each of the measure calculations.

Consumer Assessment of Healthcare Providers and Systems (CAHPS) Measures (Part C and D)

Official CAHPS preview reports will be emailed to the Medicare Compliance Officer in August. Official CAHPS plan reports will be emailed to the Medicare Compliance Officer in October. We remind contracts that any results they receive from their vendor may differ from CMS results and are not to be considered official.

If you have questions about MA and/or PDP CAHPS data please contact: MP-CAHPS@cms.hhs.gov.

Health Outcomes Survey (HOS) measures (Part C)

HPMS HOS Star Ratings Validation page:

- To access HOS Star Ratings Validation, from the top navigation bar select: “Quality and Performance,” then “HOS,” then from the left navigation bar select “Survey Results.” From the drop-down menu, select “Star Ratings Validation.” Select the appropriate cohort and contract number/name. Additional measure results can be found under “Aggregate Score Analysis.”

The Cohort 23 (2020-2022) data are currently posted. The Cohort 24 (2021-2023) data will be posted by early August 2024.

If you have questions about HOS data please contact: HOS@cms.hhs.gov.

Complaints about the Health/Drug Plan Measure (Part C and D)

On May 10, 2019, CMS released an HPMS memo with an updated Complaints Tracking Module (CTM) Plan Standard Operating Procedures (SOP). Plans should review all complaints at intake and verify the contract assignment and issue level. The memo details how sponsors may submit a Plan Request in HPMS for review by their CMS Account Manager (e.g., to request a change in contract assignment, change issue level from Plan Issue to CMS Issue, or change in category/subcategory).

As stated in the [Announcement of Calendar Year \(CY\) 2025 Medicare Advantage \(MA\) Capitation Rates and Part C and Part D Payment Policies](#), all requests for changes must be made by the June 28, 2024 deadline (i.e., Plan Requests for changes to 2023 complaint data must be made by June 28, 2024 for the 2025 Star Ratings).

As a reminder, multiple CTM cases for the same beneficiary should still be verified and communicated with the beneficiary/complainant. Once confirmed as the same issue, older CTM cases can be closed, and the CTM case number(s) should be referenced in the new complaint. CTM cases in this scenario will not be removed from plan measures for purposes of the Star Ratings.

CMS provides plans quarterly reports with additional information on the data used to calculate the Complaint Rates on the HPMS Performance pages:

- To access the Complaint Rates Reports, from the top navigation bar select: “Quality and Performance,” then “Performance Metrics,” then from the left navigation bar select “Reports.” From the drop-down menu, select from the list of reports, “Complaint Tracking.” Under “Report Type” select the “Complaint Rates” and select the appropriate report period.

The 2023 reports are currently posted. The Q1 2024 report will be posted by end of April 2024.

Questions related to your plan’s complaints measure rates or the HPMS Complaint Rates Reports should be sent to PartCandDStarRatings@cms.hhs.gov. Questions regarding CTM Plan Requests and assignments should be sent to your CMS Account Manager and copy the PartCandDStarRatings@cms.hhs.gov mailbox if related to the measures.

Appeals Measures – Independent Review Entity (IRE) Data (Part C)

Information regarding the Part C reconsideration process is available to MA organizations on the www.medicareappeal.com website.

The data available on MAXIMUS’s website, <http://www.medicareappeal.com/AppealSearch>, are updated daily; therefore, MA organizations that notice discrepancies or have questions about the data should bring these issues to the attention of MAXIMUS as they arise. Plans can view all of their cases by Received Date or look up by a specific appeal number. There is a field that indicates whether the appeal was timely. We encourage MA organizations to email any questions they may have about the data to medicareappeal@maximus.com.

As stated in the 2025 Rate Announcement, any requests for changes to IRE data must be made by June 28, 2024 (i.e., requests for changes to 2023 IRE data must be made by June 28, 2024 for the 2025 Star Ratings).

Call Center Measures – Foreign Language Interpreter and TTY Availability (Part C and D)

HPMS Performance pages:

- To access the Part C or D Call Center Reports, from the top navigation bar select: “Quality and Performance,” then “Performance Metrics,” then select from the left navigation bar “Reports” and then “Call Center Monitoring.” Under “Report Type,” from the drop-down menu, select Part C prospective beneficiary customer service or Part D prospective beneficiary customer service. Choose the 2023 study dates under “Report Period” in the drop-down menu, select your contract ID, and click “Create Report” or “Download.”

The next set of FL/TTY reports will be released in late July to early August 2024. In addition, plans/sponsors may download and review their raw call data directly from HPMS to validate the results. A data dictionary and technical notes for the Accuracy & Accessibility Study are also available via the Part C or Part D Performance Metrics page under the “Download” option. We encourage plans/sponsors to contact CMS via CallCenterMonitoring@cms.hhs.gov if they believe an error occurred.

Special Needs Plan (SNP) Care Management and Medication Therapy Management (MTM) Program Completion Rate for Comprehensive Medication Review (CMR) Measures – Part C and D Reporting Requirements data (Part C and D)

The Part C SNP Care Management measure and Part D MTM CMR measure are calculated using validated plan reported data.

For more information about data validation, please see the Medicare Part C and Part D Reporting Requirements Data Validation documents posted at:

<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/PartCDDDataValidation>.

Section 6 of the Data Validation Procedure Manual outlines the Pass/Not Pass Determination process, steps for plans/sponsors to view their data validation results in HPMS, and how plans/sponsors may submit an appeal (within 5 business days following the June 15, 2024 data validation deadline) if they disagree with the independent data validation contractor's findings. Please contact the PartCandD_Data_Validation@cms.hhs.gov email box for questions or concerns about your data validation results.

HPMS Plan Reporting Data Validation page:

- To access this page, from the top menu select “Monitoring,” then “Plan Reporting Data Validation.” Select the appropriate contract year. Select the PRDVM Reports. Select “Score Detail Report.” Select the applicable reporting section.

If you do not see this module in HPMS, contact CMSHPMS_Access@cms.hhs.gov.

A contract will be assigned 1 star in the following measures if these criteria are met:

SNP Care Management measure – if the contract 1) did not score at least 95% on data validation for the SNP Care Management reporting section, or 2) was not compliant with data validation standards/sub-standards for any the following SNP Care Management data elements:

- Number of new enrollees due for an initial Health Risk Assessment (HRA) (Element A)
- Number of enrollees eligible for an annual reassessment HRA (Element B)
- Number of initial HRAs performed on new enrollees (Element C)
- Number of annual reassessments performed on enrollees eligible for a reassessment (Element F)

MTM CMR measure – if the contract 1) failed to submit their MTM file and pass system validation by the reporting deadline, 2) had a missing data validation score for MTM, 3) did not score at least 95% on data validation for the MTM program reporting section, or 4) was not compliant with data validation standards/sub-standards for any the following MTM program data elements:

- MBI Number (Element B)
- Date of MTM program enrollment (Element H)

- Targeting criteria met. (Element I)
- Date met the specified targeting criteria per CMS – Part D requirements in § 423.153(d)(2). (Element J)
- Date of MTM program opt-out, if applicable (Element K)
- Received annual CMR with written summary in CMS standardized format (Element O)
- Date(s) of CMR(s) (Element P)

Parts C & D Reporting Web Portal:

Contracts will receive email notifications about the MTM Program Completion Rate for CMR Measure Report availability on or about July 31, 2024. Plans may download and review their data to validate the results. Reports will contain summary and beneficiary-level information for the records excluded from the calculation for their MTM CMR measure.

- To access the MTM Program Completion Rate for CMR Measure Report select the “Download Files” section of this Web Portal. Only users with Summary & Confidential Beneficiary Report access permissions will be allowed to download reports.

For questions about report availability, user authorization, or access to the Web Portal, please contact CDReporting@AcumenLLC.com.

Patient Safety Measures (Part D)

On April 20, 2023, CMS released an HPMS memo, *UPDATES - 2023 Medicare Part D Patient Safety Reports*, with updates to the measurement year 2023 Medicare Part D Patient Safety measures and reports. CMS reports the Patient Safety measures through the Patient Safety Analysis Web Portal each month. Part D sponsors may download and review their monthly measure packages. These measure packages include a summary contract-level report for each measure and additional beneficiary-level files. Part D sponsors can use the Patient Safety Reports to compare their performance to overall averages and monitor their progress in improving their measure rates.

Sponsors should review their underlying measure data in the reports each month and alert CMS if any potential issues are identified in the rate calculations per the measure specifications. Sponsors should refer to each measure’s Patient Safety Report User Guide, diagnosis codes, and the National Drug Code (NDC) medication lists used to calculate the measures which are located on the Help Documents web page on the Patient Safety Analysis Web Portal.

For questions regarding your rate calculations, diagnosis codes or exclusions, or underlying data, contact PatientSafety@AcumenLLC.com. Provide detailed information about the potential issue or question. Your request will be reviewed and if appropriate, a secure submission window will be opened in the Patient Safety Analysis Web Portal for you to submit information for a small, demonstrative sample (i.e., claims for no more than one or two beneficiaries per

Part D contract and measure that demonstrate the potential issue) for a review of the administrative data. We may request a larger sample depending on the results of the review.

The final measurement year 2023 reports will be produced at the end of July 2024 using 2023 data submitted by the [annual prescription drug event \(PDE\) submission deadline](#) for the annual Part D payment reconciliation.

CMS will release a separate HPMS memorandum in April 2024 which outlines updates to the measurement year 2024 Medicare Part D Patient Safety measures and reports. In addition, the 2024 Patient Safety Analysis Report User Guides and the monthly measure rate reports will be available for the Patient Safety measures through the [Patient Safety Analysis Web Portal](#) at the end of April 2024.

For technical questions related to the user authorization process or access to the Patient Safety Analysis Web Portal or reports, please contact PatientSafety@AcumenLLC.com.

Medicare Plan Finder (MPF) Drug Pricing Measures (Part D)

CMS will provide contracts with preliminary and final Star Rating Medicare Plan Finder (MPF) Price Accuracy reports with claim-level information used for calculating the measure scores. The preliminary reports will be made available to all contracts in the Download Files section of the MPF Communications Web Portal by the end of April 2024. The final reports will be available in July 2024. Also, in July 2024, CMS will provide all contracts final claim-level reports for the MPF Stability and Plan Submitted Higher Prices for Display on MPF display measures.

Only users with Summary & Confidential Beneficiary Report access permissions will be allowed to download reports. To update or confirm your level of access or to add users to a contract, please contact your Medicare Compliance Officer.

For all technical questions related to downloading the files, please contact PlanFinder@AcumenLLC.com. For all questions related to the Accuracy Measure detail data, contact PartCandDStarRatings@cms.hhs.gov.

Members Choosing to Leave the Plan Measure (Part C and D)

CMS provides contracts with the source beneficiary-level disenrollment detail files used for the measure numerator prior to the first plan preview upon request. **The specific date when these files will be available for transfer will be announced in a future HPMS email; no requests can be accepted prior to that HPMS email.**

At the time when the source beneficiary-level disenrollment detail files are available, the summary-level disenrollment data will also be available for contracts to review in HPMS.

Prior to requesting the disenrollment detail data files, we request that you identify the person in your organization with access to the mainframe file transfer (MFT) link your organization has with CMS. The MFT link goes by a few different names, such as GENTRAN, Connect:Direct, and TIBCO. This MFT link is the method used to transfer enrollment/disenrollment data between your organization and CMS. Your knowledge of who can retrieve the data is necessary because the files auto-expire after a few days and are deleted.

When you are ready to receive the disenrollment detail files, please send an email to PartCandDStarRatings@cms.hhs.gov requesting the files. Your email should indicate that you know who can retrieve the data and list the specific contract numbers for which data are needed.

The Star Ratings mailbox will create and ship the files through MFT. Once the files are shipped, we will reply with the MFT file naming convention, a file layout document.

Please submit general questions about Part C and D Star Ratings measures or methodology to PartCandDStarRatings@cms.hhs.gov. **Please do not send secure emails requiring CMS to log in to access the questions, as multiple staff triage your emails, and it is difficult to create and share login information.** If you need to share personally identifiable information (PII) with us, please contact us with an email to discuss a safe way to transfer the secure data. You should add the ratings mailbox to your safe sender list so our messages are not flagged as spam.

Thank you for your continued support of CMS's Part C and D Star Ratings.