

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
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CENTER FOR MEDICARE

DATE: December 19, 2024

TO: All Medicare Advantage Organizations and Prescription Drug Plans

FROM: Vanessa S. Duran, Director
Medicare Drug Benefit and C & D Data Group

SUBJECT: Release of the 2025 Data Validation Materials

CMS is announcing the release of the materials for the 2025 Data Validation (DV) of the contract year (CY) 2024 Parts C and D Reporting Requirements data. Part C and Part D sponsors must participate in an annual retrospective DV of the Parts C and D Reporting Requirements data as required under §§ 422.516(g) and 423.514(j). To ensure the reliability of the data reported, each sponsor must select a DV reviewer (contractor) to conduct the audit independently. We remind sponsors that they may not use their own staff to conduct the DV review. Also, companies that provide management consulting or assist with reporting procedures, reporting processes, or information systems used in storing, compiling, or reporting the Part C and/or Part D Reporting Requirements data to CMS may not serve as the DV contractor. Management consultation activities include performing mock audits, pre-assessments, and any other types of reviews on reported data. In summary, the DV reviewer should have no other involvement in the Parts C and D Reporting Requirements activities of the plan and thus no conflicts of interest.

The 2025 DV cycle will take place from April 1 to June 15, 2025, for 2024 data submitted for the following reporting sections:

- Part C Grievances, Organization Determinations/Reconsiderations and Special Needs Plans (SNPs) Care Management; and
- Part D Grievances, Medication Therapy Management Programs (MTM), Improving Drug Utilization Review Controls (DUR), and Coverage Determinations/Redeterminations.

Data submitted or re-submitted after March 31, 2025, cannot be used for purposes of the DV.

CMS has released the 2025 Data Validation documents:

- DV Procedure Manual
- Appendix A – Standards for Selecting a Data Validation Contractor
- Appendix B – Examination Engagement Standards (EES)
- Appendix C – Model Language for Letter to Confirm Selection of Data Validation Contractor
- Appendix D – Instructions for Completing the Application for Access to CMS Computer Systems
- Appendix E – Organizational Assessment Instrument (OAI)
- Appendix F – Interview Discussion Guide (IDG)
- Appendix G – Example Site Visit Agenda for On-site or Virtual Visits
- Appendix H – Data Extraction and Sampling Instructions
- Appendix I – Example Data File Inventory Log
- Appendix J– Pass/Not Pass Determination Methodology

These documents are posted on the CMS website at the following link and will be posted on the HPMS Plan Reporting site at a later date:

<https://www.cms.gov/medicare/coverage/prescription-drug-coverage-contracting/part-c-and-part-d-data-validation>

A separate HPMS announcement will be released when the 2025 Data Validation web-based training becomes available on CMS' Medicare Learning Network Web-Based Training page: <https://www.cms.gov/training-education/medicare-learning-network/web-based-training>.

Questions regarding 2025 Data Validation should be sent via email to PartCandD_Data_Validation@cms.hhs.gov.