DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

CENTER FOR MEDICARE

TO: All Medicare Advantage Organizations (MAOs), 1876 Cost Plans, Part D
               sponsors, and Potential Third-Party Data Validation Contractors

FROM: Cynthia G. Tudor, Ph.D., Director
               Medicare Drug Benefit and C & D Data Group
               Center for Medicare

DATE: April 20, 2012

SUBJECT: Best Practices for Data Validation Reviewers

After the completion of one data validation cycle and the start of the current cycle, the
Centers for Medicare and Medicaid Services (CMS) wants to make certain reviewers are
aware of best practices they can utilize to ensure efficient and reliable data validation reviews
are performed. CMS recommends reviewers exercise the following best practices throughout
the data validation review.

- The reviewer should remain an objective, independent third party and avoid acting in
  a consulting capacity.

- The reviewer's focus should be to determine, after a thorough evaluation, if
  Sponsors' systems, programs, data, etc. are accurate, reliable, valid, and complete
  based on instructions and standards outlined in the Data Validation Procedure Manual
  and CMS' policies. The reviewer should remain impartial. For example, he/she
  should not pass judgment on the perceived value of Sponsors' systems, programs,
  data, etc. or develop findings based on personal preferences or any other method not
  addressed in the outlined standards or CMS' policies.

- The reviewer should provide general feedback and specific information on
  deficiencies to help Sponsors improve. However, Sponsors' submissions of
  corrective action plans (either written or verbal) are not required to be provided to the
  reviewer.

- The reviewer should maintain confidentiality of Sponsors' privileged information.
  The reviewer should avoid sharing general or specific information about how
  Sponsors' data look and/or compare to one another. To promote effective
  communication, open discussions of any issues and findings with the specific
  Sponsor are encouraged. The reviewer should refrain from discussing a specific
  Sponsor's issues and findings with other Sponsors.

If you have additional specific questions regarding the data validation program or these best
practices for data validation contractors, please direct them to CMS via the data validation
mailbox @ PartCandD_Data_Validation@cms.hhs.gov.