



CENTER FOR MEDICARE

DATE: April 5, 2022

TO: All Medicare Advantage Organizations and Section 1876 Cost Plans

FROM: John A. Scott, Director
Medicare Parts C and D Oversight and Enforcement Group

Amy Larrick Chavez-Valdez, Director
Medicare Drug Benefit and C & D Data Group

SUBJECT: Timeliness Monitoring Project (TMP) - CY2022 Part C Data for 2024 Star Ratings

CMS will conduct an industry-wide monitoring project in the fall of 2022, collecting data to evaluate the processing of Medicare Advantage (Part C) reconsiderations. This memorandum provides operational and technical instructions regarding the submission requirements for this collection.¹

The TMP will include a retrospective collection and review of CY2022 data from Part C sponsors with active contracts in both CY2022 and CY2023. Sponsors that undergo a 2022 program audit will not have to resubmit data for this request if they successfully submit the requested Organization Determinations, Appeals and Grievances (ODAG) universes with no Invalid Data Submission (IDS) conditions. Sponsors can refer to their preliminary draft audit report for any IDS conditions. Sponsors that had an IDS condition for any of the universes listed below will only be required to resubmit the affected universe(s). Sponsors that are undergoing an audit validation in 2022 are not exempt from this collection. All standalone Prescription Drug Plan, Program of All-Inclusive Care for the Elderly, Medicare-Medicaid Plan (MMP), Medicare Medical Savings Account, Employer/Union Only Direct (“E” contracts), and 1833 Health Care Prepayment Plan contracts are excluded from this data submission.

CMS reminds Part C sponsors that this monitoring effort will provide all sponsors the ability to demonstrate their data for the Independent Review Entity (IRE) are accurate and valid for use in CMS' Medicare Part C Star Ratings. Failure to submit requested data or failure to submit complete data for TMP will result in a reduction in the applicable Star Ratings measures (see § 422.164(g)).

Operational Details of the Timeliness Monitoring Project

CMS will collect select ODAG audit universes from each contract to assess all sponsors' timeliness in processing Part C reconsideration requests, as well as sponsor compliance with forwarding cases to the IRE. The universe record layouts from the Medicare Parts C and D Program Audit protocol for ODAG (<https://www.cms.gov/files/zip/final-protocols-medicare->

¹ The TMP collection is included in CMS 10717 (OMB Control Number 0938-1395) (Expires: 05/31/2024)

[part-c-and-part-d-program-audits-and-industry-wide-part-c-timeliness.zip](#)) will be used for the TMP collection of CY2022 data. Please note that this is an updated protocol for 2022, so the names and record layouts of the universe tables will be different from last year's data collection. **Please ensure your organization prepares and submits data using the updated record layouts.**

As in previous years, CMS will be conducting this collection in three waves, with the first wave of data request letters being issued in September 2022 and the last wave in October 2022. The universes that will be requested are indicated below. **Please note for Universe Table 3 (PYMT_C) the collection will be limited to data for payment reconsiderations only.**

- Universe Table 2: Standard and Expedited Pre-service Reconsiderations (RECON) Record Layout
- Universe Table 3: Payment Organization Determinations and Reconsiderations (PYMT_C) Record

CMS will request either a 2-week, 4-week, 8-week, or 12-week universe period starting January 1, 2022, depending on the size of the sponsor. Sponsors will be divided into four enrollment bands based on their total enrollment across all contracts subject to this monitoring project. These four enrollment bands, included in the ODAG audit protocol under the link above, will be used to determine the amount of data to be collected per universe from each sponsor, as follows.

Sponsors with a total enrollment of:

- 500,000 or more enrollees will submit two weeks of data.
- 250,000 to 499,999 enrollees will submit four weeks of data.
- 50,000 to 249,999 enrollees will submit eight weeks of data.
- less than 50,000 enrollees will submit 12 weeks of data.

For example: a sponsor with 300,000 enrollees will submit data for the review period of January 1, 2022 through January 28, 2022.

Similar to the collection for program audits, universe submissions should include data processed in-house and by all First Tier, Down-stream, and Related entities (FDRs) on their behalf. In addition, all universes will be submitted at the Parent Organization level, based on June 2022 total enrollment across all contracts subject to this monitoring project; therefore, one universe submission may include data for multiple contracts.

Beginning in September 2022, organizations will receive a data request email from the following mailbox: TimelinessMonitoring@cms.hhs.gov. This email will include additional instructions on the time period being tested, how to submit the data through the Secure File Transfer Protocol (SFTP), deadlines for submission, and information on when validation webinars will be scheduled. **Please ensure you retain a copy of the complete TMP submission for your records.**

CMS will run a timeliness analysis on all validated universes and determine a rate of timeliness for

each case type. The findings will be reviewed and may result in compliance actions, if necessary, and may have implications for the Star Ratings data integrity reviews for the two Part C appeals measures.

Data Transfer Information for the Timeliness Monitoring Project

CMS is using two support contractors, David James and Conrad, to collect and analyze these data in the fall of CY2022. The subcontractors for these organizations are Booz Allen Hamilton and Myers & Stauffer, respectively. Sponsors will receive emailed communications from one of these organizations regarding the data submission. Please make note of these organizations' names so future emails related to this project will be identified as legitimate communications on behalf of CMS.

Sponsors are expected to submit the requested data via SFTP within 10 business days (excluding federal holidays) after receiving the request. Many sponsors already set up SFTP accounts as part of their CMS program audit or as part of the TMP last year. Only one individual per organization will be granted access to the SFTP. You can check your access at the following website:

<https://transfer.mslc.com/>.

By July 25, 2022, please email CMSProgramAudits@mslc.com and provide one of the following responses regarding your organization's SFTP access:

1. We do not have an existing SFTP user and need to establish an account (provide the full name, email, and phone number of the individual who will be assigned to the account as well as the name of the Parent Organization they represent).
2. We have an existing user and would like that account terminated (provide name and email) and replaced with (provide name and email).
3. We have an existing user who should remain on the account, but we need an updated/reset password.
4. We have an existing user who should remain on the account and we are able to successfully log into the SFTP site.

Questions regarding the collection of data for this monitoring project should be sent to TimelinessMonitoring@cms.hhs.gov.

Questions about the analyses and how the results of this monitoring project impact the Star Ratings program should be sent to PARTCDQA@cms.hhs.gov.