

# Acing the Medicare 2020 Timeliness Monitoring Project with Flying Colors

In October CMS issued a memo regarding the 2020 Timeliness Monitoring Project (TMP). As in previous years, CMS will be conducting an industry-wide monitoring project by collecting data to evaluate the timeliness of processing of Medicare Advantage (Part C) organization determinations and reconsiderations (ODAG) and Medicare Prescription Drug (Part D) coverage determinations and redeterminations (CDAG).

**Who's going to get monitored?** Medicare Advantage Organizations, Prescription Drug Plans, and Section 1876 Cost Plans with active contracts in both CY2019 and CY2020. If you had a program audit in 2019, you are off the hook IF you successfully submitted the CDAG and ODAG universes without any Invalid Data Submission (IDS) conditions *and* had at least one month of 2019 data for each of the required universes. If you *did* have an IDS on any of the required universe(s) the good news is you only have to resubmit the affected universe(s). It is important to note that while data validation audits are similar, you are still required to participate in the TMP.

**What's being monitored?** Part C pre-service and payment reconsiderations and Part D coverage determinations and redeterminations, including direct member reimbursement requests. The review time period will depend on your enrollment size. Sponsors with a total enrollment (across all contracts subject to this monitoring project) of 250,000+ enrollees will submit one month of data (February). Sponsors with an enrollment between 50,000 and 250,000 will submit two months of data (February and March). Sponsors with enrollment less than 50,000 will submit three months of data (February, March, and April). Like the collection for program audits, universe submissions must include data processed in-house and by all First Tier, Down-stream, and Related entities (FDRs) on your behalf. In addition, all universes will be submitted at the Parent Organization level; therefore, one universe submission may include data for multiple contracts.

**When does all this monitoring start?** Sooner than you would like. CMS will be conducting this collection in three waves, with the first wave of letters requesting data being issued in January 2020. You will receive a data request email from the following mailbox: [TimelinessMonitoring@cms.hhs.gov](mailto:TimelinessMonitoring@cms.hhs.gov). This email will include additional instructions on the time period being tested (see above), how to submit the data through the Secure File Transfer Protocol (SFTP), actual deadlines for submission (it's 15 business days!), and information on when validation webinars will be scheduled.

**Then what happens?** 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 four appeals measures.

**How can we best prepare?** Don't panic—you've got this—and Madena is here to help. We have decades of experience and audits under our belt. We have supported clients by:

- **Performing systems review to design universes** - we get in the trenches with you to get the right data out of your system(s) and into the right universe. We have experience with many claims and UM systems on the market. We can help map your data from your front end to the backend tables and then to the universes.
- **Gap analysis** - we identify risks and gaps in your data capture, and work to create new requirements and processes that support more comprehensive and reliable data entry that directly supports valid and reliable data extracts.
- **Evaluating universes for adherence to instructions** - we will put your universe files into our analytic tools and provide you with detailed accuracy and quality checks. We will provide recommendations on data clean-up and will then re-validate your universes. And we will do this as many times as it takes to get it right.
- **Reviewing timeliness standards** – while your universes are in our analysis tool, we will perform checks for timeliness against compliance standards. We will provide a detailed report of results and can even assist with process enhancements.
- **Conducting mock webinars for data accuracy** - we play the part of CMS to make sure you will be your confident best when the time comes. We will share our tips for a successful webinar and make sure you correct any problems BEFORE a CMS review.
- **Assisting with guiding FDRs in the timeliness monitoring requirements** - that's right, we'll work with your FDRs, review their data, and perform mock webinars with them too.

Data integrity continues to be a CMS priority, not only for Star Ratings and IRE data accuracy, but also for required Part C and Part D reporting. For the compliant operations of your plan, it is critically important to have correct universe preparation. Madena can help. We currently provide guidance, suggestions, monitoring support and best practices for universe development to address quality and identify potential risks. Contact us or learn more at [www.madenasolutions.com](http://www.madenasolutions.com).