

Medicare 2021 Timeliness Monitoring Project

In October CMS issued a memo regarding the 2020 Timeliness Monitoring Project (TMP). As in previous years, CMS will once again be conducting an industry-wide monitoring project in 2021.

What's changed? Beginning with the 2021 TMP, CMS will no longer collect the Part D Coverage Determination Appeals and Grievances universes used to evaluate these measures. The review time period is starting one month sooner, in January.

Who's going to get monitored? Part C sponsors with active contracts in both CY2020 and CY2021.

- ⇒ If you had a program audit in 2020 you are off the hook *if* you successfully submitted the ODAG universes without any Invalid Data Submission (IDS) conditions *and* had at least one month of 2020 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).
- ⇒ If you had just a validation audit in 2020 you are still on the hook.

What's being monitored? In 2021, data will only be collected to evaluate the timeliness of processing of Medicare Advantage (Part C) organization determinations and reconsiderations; this includes ODAG Tables 5, 6, & 7. 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 (January).
- ⇒ Sponsors with an enrollment between 50,000 and 250,000 will submit two months of data (January & February).
- ⇒ Sponsors with enrollment of less than 50,000 will submit three months of data (January, February & March).

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, based on November 2020 total enrollment. 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 2021. You 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 (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 two appeals measures.

How can we best prepare? Don't panic, you got this! And Madena can help. We have dozens of years and just as many audits under our belt. We can support clients by:

- ⇒ **Performing systems review to design universes:** we get right in the trenches with you to get the right data out of your system(s) and into the right universe. We have experience with HSP, QNXT, and many others. We can help map your data from your GUI to the backend tables and then to the universes.
- ⇒ **Evaluating universes for adherence to instructions:** our analysis tools will provide detailed accuracy and quality checks of your universe files. We will advise on data clean up and recheck the files, 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.

It is critically important to get universe preparation correct to ensure the compliant operations of your plan. Data integrity continues to be a CMS priority not only for Star Ratings and IRE data accuracy but also for required Part C & D reporting. Madena can help with expert guidance, monitoring support, and best practices for universe development to address quality and identify potential risks. Contact us at info@madenasolutions.com, 207.571.9356, or learn more at www.madenasolutions.com.