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

DATE:            June 28, 2021

TO:              All Medicare Advantage Organizations and Section 1876 Cost Plans

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SUBJECT:         Timeliness Monitoring Project (TMP) - CY2021 Part C Data for 2023 Star Ratings

CMS will conduct an industry-wide monitoring project in the fall of 2021, collecting data to evaluate the timeliness of processing of Medicare Advantage (Part C) reconsiderations.[1] This memorandum provides operational and technical instructions regarding the submission requirements for this data collection.  In prior years we have collected the TMP data for a given year beginning in January of the next calendar year.  However, we are providing organizations the opportunity to submit their first quarter CY2021 Part C data this fall so they do not have to accommodate retrospective TMP requests while planning for future program audits.

The Timeliness Monitoring Project (TMP) will include a retrospective collection and review of CY2021 data from Part C sponsors with active contracts in both CY2021 and CY2022. Sponsors that undergo a program audit in 2021 will not have to resubmit data for this request if they successfully submit the Organization Determinations, Appeals and Grievances (ODAG) universes without any Invalid Data Submission (IDS) conditions and have at least one month of 2021 data for each of the universes listed below. 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 2021 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

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[1] This collection is included in CMS 10191(OMB Control Number 0938-1000) (Expires: *6/30/2023*).

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 ODAG audit universes from each contract to assess all sponsors' timeliness in processing Part C requests, as well as sponsor compliance with forwarding cases to the IRE. The universe record layouts from the 2020 Medicare Parts C and D Program Audit protocols (https://www.cms.gov/files/zip/2020-medicare-parts-c-and-d-program-audit-protocols.zip) will be used for the TMP collection of CY2021 data.

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 2021 and the last wave in October 2021. The universes that will be requested are as follows:

**ODAG:**
- Table 5: Standard Pre-service Reconsiderations (SREC) Record Layout
- Table 6: Expedited Pre-service Reconsiderations (EREC) Record Layout
- Table 7: Requests for Payment Reconsiderations (PREC) Record Layout

The universe review time period requested will be January, February, and/or March 2021 depending on the size of the sponsor. The enrollment bands listed in the ODAG audit protocol available under the link above will be used to determine the amount of data to be collected from each sponsor. Sponsors with a total enrollment (across all contracts subject to this monitoring project) over 250,000 enrollees will submit one month of data (January) for each of the above universes, sponsors with an enrollment of 50,000 to 250,000 enrollees will submit two months of data (January and February), and sponsors with an enrollment of less than 50,000 enrollees will submit three months of data (January, February, and March).

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 2021 total enrollment across all contracts subject to this monitoring project; therefore, one universe submission may include data for multiple contracts.

Beginning in September 2021, 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 appeals measures.

If your organization believes it will be unable to comply with the TMP data collection requests issued in September and October 2021, please submit an exception request for an alternative submission window to TimelinessMonitoring@cms.hhs.gov.  **This exception request must be received no later than August 2, 2021.**

### *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 CY2021. 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 August 2, 2021**, 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 that 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 results of this monitoring project and the Star Ratings program should be sent to PARTCDQA@cms.hhs.gov.