Medicare Timeliness Monitoring Project (TMP)

CMS continues to conduct an industry-wide Timeliness Monitoring Project (TMP), which collects data to evaluate the timeliness of processing Medicare Advantage (Part C) reconsiderations. Starting in the fall of 2021, plans will be given the opportunity to submit their first quarter CY2021 Part C data, so they do not have to accommodate retroactive TMP requests while planning for future program audits.

Who gets monitored? Part C sponsors with active contracts in both the previous and current contract years.

⇒ If you had a program audit in the current year 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 current year data for each of the required universes.

⇒ If you had 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 the current year, you are still on the hook.

What's being monitored? Starting in 2021, data will be collected to evaluate the timeliness of processing of Medicare Advantage (Part C) organization determinations and reconsiderations; this includes ODAG Tables 5 (Standard Pre-service Reconsiderations), 6 (Expedited Pre-service Reconsiderations), and 7 (Requests for Payment Reconsiderations). 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; therefore, one universe submission may include data for multiple contracts.

When does all this monitoring start? Sooner than you may like. CMS will conduct this collection in three waves, with the first wave of letters requesting data be issued in September. You will receive a data request email from the following mailbox: TimelinessMonitoring@cms.hhs.gov. This email includes additional instructions on the time period being tested (see above), how to submit data through the Secure File Transfer Protocol (SFTP), actual deadlines for submission (15 business days), and schedule information on validation webinars.

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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 CODY® can help. We have years of experience and just as many audits under our belt. We support clients by:

⇒ **Performing systems review to design universes**: we're 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 provide detailed accuracy and quality checks of your universe files. We advise on data clean-up and recheck the files as many times as it takes to get it right.

⇒ **Reviewing timeliness standards:** while your universes are in our analysis tool, we perform checks for timeliness against compliance standards and provide a detailed report of the results. We can also assist with process enhancements.

⇒ **Conducting mock webinars for data accuracy:** we play the part of CMS to ensure confidence when the time comes. We'll share our tips for a successful webinar and make certain any problems are corrected *before* a CMS review.

⇒ **Guiding FDRs in the timeliness monitoring requirements:** we'll work with your FDRs, review their data, and perform mock webinars with them as well.

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. CODY® can help with expert guidance, monitoring support, and best practices for universe development to address quality and identify potential risks.