

DEPARTMENT OF HEALTH & HUMAN
SERVICES

Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850



DATE: September 8, 2025

TO: All Medicare Advantage Organizations and Demonstrations

FROM: Steven Ferraina, Acting Director, Audits and Vulnerabilities Group, Center for Program Integrity
Jennifer R. Shapiro, Director, Medicare Plan Payment Group, Center for Medicare

SUBJECT: REMINDER - Suspension of the Submission of Risk Adjustment Data and Overpayment Reports for Payment Years 2020 through 2024

The purpose of this memorandum is to remind Medicare Advantage (MA) organizations that the submission of risk adjustment data corrections (i.e., closed period deletes) for payment years 2020 through 2024 are currently suspended. This pause on submissions includes the Risk Adjustment Processing System (RAPS) and the Encounter Data Processing System (EDPS), as well as submission of overpayment reports and auditable estimates to the Risk Adjustment Overpayment Reporting (RAOR) module. The suspension will be in place while Risk Adjustment Data Validation (RADV) audit samples are being developed for those payment years (see May 30, 2025 HPMS memo, "Deadlines for the Submission of Risk Adjustment Data for Risk Adjustment Data Validation Sampling").

CMS reminds MA organizations that while the submission of data corrections to CMS systems for these years are on hold, the MA organization's obligations under section 1128J(d) of the Social Security Act and 42 CFR 422.326 remain. For payment years 2020 through 2024, CMS will issue a notice via HPMS when MA organizations should resume the submission of data corrections to RAPS and/or EDPS and the reporting of overpayments to the RAOR module. Once notified, MA organizations will be required to report and return any plan-identified overpayments to CMS in accordance with 42 CFR 422.326 for plan-identified overpayments related to enrollees in the subject MA contract that are not included in the sampling frame for the payment year specific RADV audit.

For questions regarding submission of risk adjustment data for RADV sampling and overpayment recovery, please contact RiskAdjustmentPolicy@cms.hhs.gov. For questions about RADV, please contact RADV@cms.hhs.gov.