

DEPARTMENT OF HEALTH & HUMAN
SERVICES
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CENTER FOR MEDICARE

DATE: May 30, 2025

TO: All Medicare Advantage Organizations and Demonstrations

FROM: Steven Ferraina, Acting Director, Audits and Vulnerabilities Group, Center for Program Integrity
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SUBJECT: Deadlines for the Submission of Risk Adjustment Data for Risk Adjustment Data Validation Sampling

The purpose of this memorandum is to notify Medicare Advantage (MA) organizations of the deadlines to submit risk adjustment data corrections (i.e., closed period deletes) to the Risk Adjustment Processing System (RAPS) and/or the Encounter Data Processing System (EDPS) for upcoming Risk Adjustment Data Validation (RADV) audit sampling.

As noted in the May 21, 2025 press release, CMS is accelerating the auditing of MA contracts for payment years (PYs) 2018 through 2024. As such, CMS will be developing samples for upcoming contract-specific RADV audits for PYs 2020 to 2024 starting in June 2025. Points of contact for MA contracts selected for the PY 2018 RADV audit received audit notices via HPMS on November 14, 2024. Sampling frames for PY 2019 RADV audits have been established, and MA contracts selected for audit will soon begin receiving audit notices.

As part of this process, MA organizations must submit their known closed period deletes by the deadline for each of the PYs 2020 to 2024 in the table below. To further ensure that deleted diagnoses are not included in these RADV samples, MA organizations should suspend the submission of data corrections in RAPS and/or EDPS as of the deadlines in the table until notified by CMS that submissions can resume. MA organizations should also refrain from submitting overpayment reports and auditable estimates for PYs 2020 to 2024 in the Risk Adjustment Overpayment Reporting (RAOR) module as of these deadlines until notified by CMS.

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 PYs 2020 to 2024, CMS will issue a notice via HPMS when MA organizations should resume the submission of data corrections in RAPS

and/or EDPS and the reporting of overpayments to the RAOR module. At that time, 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 auditⁱ.

CMS would like to emphasize that all MA organizations are required to comply with their legal, regulatory, and contractual responsibilities regarding the submission of accurate risk adjustment data as specified under 42 CFR 422.310 and correct their risk adjustment data based on their best knowledge, information, and belief.

The deadlines for submitting all closed period deletes for these samples are listed in the table below:

Payment Year	Relevant CMS System	Dates of Service	RA Data Submission for RADV Sampling Deadline
2020	RAPS/ EDPS	January 1, 2019 – December 31, 2019	June 16, 2025
2021	RAPS/ EDPS	January 1, 2020 – December 31, 2020	June 23, 2025
2022	EDPS	January 1, 2021 – December 31, 2021	June 30, 2025
2023	EDPS	January 1, 2022 – December 31, 2022	July 8, 2025
2024	EDPS	January 1, 2023 – December 31, 2023	July 15, 2025

MA organizations should review the March 15, 2024, HPMS memo, *Support for Use of Encounter Data in Overpayment Reruns*, and the May 21, 2024, HPMS memo, *Follow Up to May 1, 2024 “Use of Encounter Data in Overpayment Reruns” User Group for All Organizations Who Submit Risk Adjustment Data*, for guidance related to encounter data deletes.

Of note, CMS will not make payment adjustments at this time based on the closed period deletes submitted by the RA data submission for RADV sampling deadlines. CMS will announce the reruns of PYs 2020 through 2024 and their related overpayment data submission deadlines in future HPMS memos.

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

ⁱ MA organizations with contracts selected for RADV audit for PYs 2018 and 2019 should follow instructions in each year’s RADV Audit Methods and Instructions regarding the reporting and returning of plan-identified overpayments. Reference the PY 2018 Audits and Methods and Instructions on the [MA RADV website](#). The PY 2019 Audit Methods and Instructions will be published when audits are initiated.