

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

DATE: April 28, 2025

TO: All Medicare Advantage Organizations, PACE Organizations, Medicare-Medicaid Plans, Cost Contractors, and Demonstrations

FROM: Jennifer R. Shapiro, Director, Medicare Plan Payment Group

SUBJECT: Deadline for Submitting Risk Adjustment Data for Use in Risk Score Calculation Runs for Payment Years 2025, 2026, and 2027

This memo is to notify Medicare Advantage Organizations, PACE Organizations, Medicare-Medicaid Plans, Cost Contractors, and any demonstration plans of upcoming deadlines to submit risk adjustment data for use in calculating risk scores for Payment Years (PY) 2025, 2026, and 2027. All risk adjustment data (Risk Adjustment Processing System (RAPS) Data and Encounter Data System (EDS) Data) that will be included in the listed risk score runs need to be submitted by 8 pm ET of the “Deadline for Submission of Risk Adjustment Data.”

No data submitted after 8 PM ET on the risk adjustment data submission deadline date will be reflected in the respective model run. Risk adjustment data submitted after the deadline for an initial run but prior to the deadline for the mid-year run will be included in the mid-year run. Risk adjustment data submitted after the deadline for a mid-year run but prior to the deadline for final reconciliation run will be included in the final reconciliation run.

It is important to note that while data must be updated and corrected by organizations before and after the final risk adjustment data submission deadline, CMS will not make additional payments for diagnoses received after the final risk adjustment data submission deadline (42 CFR 422.310(g)).

We strongly encourage organizations to submit their data throughout the data collection period and well in advance of the risk adjustment data submission deadlines to ensure ample time to resolve any data submission issues, such as validation errors, data rejections, or inaccuracies in submitted files by the relevant deadline (initial, mid-year, or final). We expect plans to take particular care before the final deadline, since per 422.310(g)(2), CMS does not include diagnoses submitted after this deadline, and will only process deletes submitted after this deadline, in later risk score runs.

The following table lists all initial, mid-year, and final risk score runs through the PY 2026 final risk adjustment data submission deadline, with relevant dates of service, and risk adjustment data

submission deadlines in the order of future deadlines.

Risk Score Run	Dates of Service	Deadline for Submission of Risk Adjustment Data	Anticipated Payment Month
2026 Initial	07/01/2024 – 06/30/2025	Friday, 09/05/2025	January 2026
2025 Final Run	01/01/2024 – 12/31/2024	Monday, 02/2/2026	Monitor MARx monthly payment letters in HPMS
2026 Mid-Year	01/01/2025 – 12/31/2025	Friday, 03/06/2026	Monitor MARx monthly payment letters in HPMS
2027 Initial	07/01/2025 – 06/30/2026	Friday, 09/04/2026	January 2027
2026 Final Run	01/01/2025 – 12/31/2025	Monday, 02/01/2027	Monitor MARx monthly payment letters in HPMS

Questions related to this guidance should be sent to riskadjustmentpolicy@cms.hhs.gov. Please use ‘HPMS Memo- Deadline for Submitting Risk Adjustment Data for Use in Risk Score Calculation Runs for Payment Years 2025, 2026, and 2027’ as the subject in all communications regarding this guidance.