



# Reminder of Existing Obligation to Submit Accurate Risk Adjustment Data

The following message is being sent in response to questions received by CMS.

CMS is reminding all MA organizations of the longstanding requirement to submit data corrections even after the final risk adjustment data submission deadline (hereafter referred to as “the deadline”) has passed.

As noted in the April 15, 2022 HPMS memo, Reminder of Existing Obligation to Submit Accurate Risk Adjustment Data, once an MA organization has identified that incorrect diagnosis data were submitted, the MA organization is responsible for deleting the incorrect diagnosis data through the established submission process (i.e., Risk Adjustment Processing System (RAPS) and/or Encounter Data Processing System (EDPS)) (42 CFR 422.310(d)(2)). The obligation to delete incorrect diagnosis data applies regardless of whether the MA organization identifies the incorrect diagnosis data prior to the deadline or after.

If you have an active contract and have data corrections for RAPS and/or EDPS starting with payment year 2016, please submit those corrections to the appropriate systems (RAPS and/or EDPS).

In rare circumstances when an MA organization that identifies incorrect data after the deadline does not have the data available to submit to RAPS and/or EDPS, the payment year is prior to the 6 year lookback period, or when a contract is no longer active, the organization should submit an overpayment report with an auditable estimate to the Risk Adjustment Overpayment Reporting (RAOR) module in HPMS.

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