

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

DATE: **October 16, 2026**

TO: All Medicare Advantage Organizations, Prescription Drug Plans, Cost Plans,
 PACE Organizations, and Demonstrations

FROM: Shruti Rajan, Acting Director, Medicare Plan Payment Group

SUBJECT: Pause in Submissions to the Risk Adjustment Overpayment Reporting (RAOR)
 Module in HPMS

The purpose of this memo is to notify all Medicare Advantage (MA) organizations and other entities that submit risk adjustment data that CMS will be updating the functionality of the Risk Adjustment Overpayment Reporting (RAOR) module to streamline user experience.

As part of the transition, the RAOR module will be closed to all users for reporting new plan-identified overpayments starting **Monday, October 19, 2026**. Although the RAOR module will not accept new reports during this time, MA organizations will be able to edit existing overpayment reports as necessary. CMS will issue a notice via HPMS before the new RAOR module is deployed, containing details of the updates and the date when MA organizations may resume reporting new plan-identified overpayments to the RAOR module in accordance with 42 CFR 422.326.

The limited instances in which the RAOR module should be used to report and return risk adjustment related plan-identified overpayments can be found in 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."

Once CMS provides notice that the new RAOR module has been deployed, MA organizations can resume reporting when the appropriate circumstances apply. The temporary closure of the RAOR module does not relieve MA organizations from complying with legal, regulatory, and contractual responsibilities regarding the submission of accurate risk adjustment data as specified under 42 CFR 422.310 or from correcting risk adjustment data based on their best knowledge, information, and belief (42 CFR 422.504(l)(2)).

We remind MA organizations that while the RAOR module is closed, the obligations under section 1128J(d) of the Social Security Act and 42 CFR 422.326 remain in that the submission of risk adjustment data corrections to the appropriate CMS systems (RAPS and/or EDS) should

continue. Data corrections due by October 30, 2026 for the PY 2021 overpayment rerun and November 30, 2026 for the PY 2020 overpayment rerun must be submitted through RAPS and/or EDS by these deadlines.

For questions relating to this memo, please email the Risk Adjustment Policy mailbox at riskadjustmentpolicy@cms.hhs.gov.