

DEPARTMENT OF HEALTH & HUMAN
SERVICES

Centers for Medicare & Medicaid Services
7500 Security Boulevard
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CENTER FOR MEDICARE

DATE: January 10, 2025

TO: Medicare Advantage Part D plans, 1876 Cost Plans, Prescription Drug Plans, and PACE organizations

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

SUBJECT: Part D Risk Scores for the RxHCC Risk Adjustment Models Discussed in the 2026 Advance Notice

On January 10, 2025, CMS published the Advance Notice of Methodological Changes for Calendar Year (CY) 2026 for Medicare Advantage (MA) Capitation Rates and Part C and Part D Payment Policies, in which we propose updated RxHCC risk adjustment models. This memo is to inform Part D sponsors that CMS has posted Part D plan-level risk scores on HPMS. These risk scores are calculated with the RxHCC models discussed in the CY 2026 Advance Notice. Risk scores and accompanying technical notes can be found in the Risk Adjustment module of HPMS under the heading “Proposed Risk Scores.” Select “Proposed PY 2026 Part D Model Risk Scores” from the drop-down menu and enter a Contract ID to access information related to a specific contract number.

All risk scores posted today on HPMS are PY 2023 risk scores, calculated with diagnoses submitted for 2022 dates of service.

- ***Non-PACE Organizations.*** The Part D risk scores provided were calculated using the risk adjustment model currently in place for PY 2025 (i.e., the 2025 RxHCC model), as well as the proposed and alternate RxHCC models described in the CY 2026 Advance Notice. Risk scores calculated with these models use diagnoses from encounter data and FFS claims filtered with the HCPCS-based filtering logic.
- ***PACE Organizations.*** The Part D risk scores provided were calculated using the risk adjustment model currently in place for PY 2025 for PACE organizations (i.e., the 2025 RxHCC model), as well as the proposed and alternate RxHCC models for PACE organizations described in the CY 2026 Advance Notice. Risk scores calculated with these models use diagnoses from RAPS, encounter data, and FFS claims filtered with the specialty-based filtering logic.

Technical questions related to the Part D risk scores posted on HPMS should be sent to riskadjustmentpolicy@cms.hhs.gov and specify “2026 Advance Notice Part D Risk Scores” in the subject line.

To submit electronic comments on proposals in the CY 2026 Advance Notice, go to www.regulations.gov, enter the docket number “CMS-2024-0360” in the “Search” field, and follow the instructions for “submitting a comment.”