

# Special Needs ——— Plan Alliance

## CMS Payment Year 2020 Medicare Advantage Contract-Specific Risk Adjustment Data Validation (RADV) Methods and Instructions

On March 20, CMS [released](#) the Payment Year 2020 Medicare Advantage Contract-Specific Risk Adjustment Data Validation (RADV) Methods and Instructions. A table showing the differences between the 2019 and 2020 methods, is below.

Item	PY 2019 RADV Audit	PY 2020 RADV Audit
<b>Sampling Frame</b>	Enrollees ranked in the top <b>10%</b> of RADV-eligible enrollees across all eligible MA contracts, based on one or both of CPI's PY 2019 improper payment prediction models	Enrollees ranked in the top <b>25%</b> of RADV-eligible enrollees across all eligible MA contracts, based on one or both of CPI's PY 2020 improper payment prediction models
<b>Sample Size</b>	35 enrollees	35, 50, 100, or 200 enrollees, determined by the size of the sampling frame
<b>Extrapolation Methodology</b>	Average change in risk score from RADV audit for sample multiplied by the county rate for each enrollee in the sampling frame	Average change in risk score from RADV audit for sample multiplied by the county rate for each enrollee in the sampling frame
<b>Extrapolation Approach</b>	CMS intends to extrapolate audit results to the full sampling frame	CMS notes the final rule authorizing extrapolation was vacated and is under appeal (Humana case); CMS will determine at a later date whether to extrapolate or limit recovery to sampled enrollees only
<b>Medical Record Submission Window</b>	3 months	5 months
<b>Number of Medical Records</b>	Up to 2 records per audited HCC per sampled enrollee (e.g., for a member with 3 audited HCCs plan may submit up to 6 records)	Up to 2 records per audited HCC per sampled enrollee (e.g., for a member with 3 audited HCCs plan may submit up to 6 records)
<b>Hardship Exceptions</b>	Hardship exception deadline falls <b>before</b> the final medical record submission deadline	Hardship exception deadline falls <b>after</b> the final medical record submission deadline
<b>Additional HCCs</b>	Credit is available for additional HCCs whether or not they are within the same hierarchy as the HCC under review	Credit is only available for additional HCCs that are within the same hierarchy as the HCC under review