

2019 Benefit Year HHS-RADV Activities Timeline

On April 13, 2020, the Centers for Medicare & Medicaid Services (CMS) published guidance postponing the start of the 2019 benefit year HHS Risk Adjustment Data Validation (HHS-RADV) process until the 2021 calendar year due to the Coronavirus 2019 (COVID-19) pandemic, referenced in the following memorandum: <https://www.cms.gov/files/document/2019-HHS-RADV-Postponement-Memo.pdf>. CMS is issuing the below updated timeline for 2019 benefit year HHS-RADV activities, with Initial Validation Audit (IVA) samples being released in January 2021. CMS anticipates that 2020 benefit year HHS-RADV will commence as usual with the release of IVA samples in May 2021. CMS will continue monitoring the COVID-19 pandemic and will make adjustments to this timeline as needed. For questions regarding the 2019 Benefit Year HHS-RADV Activities Timeline, please contact CCIIOACARAdatavalidation@cms.hhs.gov.

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Date	2019 Benefit Year HHS-RADV Activities and Descriptions
September 3 – 17, 2020	<p>CMS identifies and notifies eligible issuers of exemptions</p> <ul style="list-style-type: none"> • First, CMS notifies eligible issuers identified as having \$15 million or less in total premiums statewide who are exempt from the 2019 HHS-RADV IVA and Second Validation Audit (SVA) Requirements under 45 CFR 153.630(g)(2) and have not been selected for random or targeted sampling for 2019 HHS-RADV • Second, CMS notifies issuers identified as having 500 or fewer billable member months statewide who are exempt from 2019 benefit year HHS-RADV IVA and SVA requirements under 45 CFR 153.630(g)(1) • Additionally, CMS will notify issuers identified as only issuer in a state risk pool market (sole market risk pool issuers) and issuers offering only small group carry over coverage for the applicable benefit year who are exempt from 2019 HHS-RADV • CMS instructs eligible exempt issuers how to complete the 2019 Benefit Year HHS-RADV Issuer Exemption and DDVC Web Form
October 5 – November 23, 2020	IVA Entities elect to participate in 2019 benefit year HHS-RADV
November 2020	2019 Benefit Year HHS-RADV Protocols released (exact date forthcoming)
November – December 2020	Issuers contractually select IVA Entities for 2019 benefit year HHS-RADV
December 1, 2020	Issuers begin designating IVA Entities within the HHS-RADV Audit Tool
January 5, 2021	<ul style="list-style-type: none"> • CMS deploys HHS-RADV first run (preliminary) sampling command to External Data Gathering Environment (EDGE) servers • Issuers must execute the command by the day the command is released, no later than 10:00 a.m. Eastern Time (ET)

Dates are subject to change

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	<ul style="list-style-type: none"> Sampling Reports are provided to CMS for validation. Reports are NOT available to issuers
January 19, 2021	<ul style="list-style-type: none"> CMS deploys second run (final) HHS-RADV sampling command to issuers EDGE servers to provide 2019 benefit year HHS-RADV IVA samples and accompanying reports Issuers must execute command the day the command is released no later than 10:00 a.m. ET Reports are available to both issuers and CMS
January 19 – February 3, 2021	15-calendar day HHS-RADV sampling discrepancy window following the release of the final HHS-RADV reports
January 19 – September 1, 2021	Issuers' IVA Entities conduct the IVA
July 1, 2021	Audit Tool opens for IVA testing and submissions
September 1, 2021	<ul style="list-style-type: none"> Deadline for IVA Entities' submission of Package 1 audit findings and issuer signoff CMS closes Package 1 submission window at 8:00 p.m. ET
September 9, 2021	<ul style="list-style-type: none"> Deadline for IVA Entities' submission of sampled enrollees' medical records (Package 2) to CMS for the SVA subsample and issuer signoff CMS closes the Package 2 submission window at 8:00 p.m. ET
September 9, 2021	Deadline for IVA Entity Inter-rater Reliability (IRR) submission
September 9 – December 2021	CMS' SVA Entity conducts the SVA ¹
December 2021	2019 Benefit Year HHS-RADV Summary of Final Pairwise Results <ul style="list-style-type: none"> Summary of Final Pairwise Results released to <u>all</u> issuers SVA Findings Report released <u>only</u> to HIOS ID(s) with Insufficient Agreement
30-calendar day window after release of Final Pairwise Results (December 2021 – January 2022)	2019 Benefit Year SVA Findings Report Attestation and Discrepancy Reporting for HIOS ID(s) with Insufficient Agreement (30-day discrepancy window) occurs (exact date forthcoming)
February 2022	2019 Benefit Year Final Results Report Suite (includes final pre-appeal results memo of national HCC failure rate and error rate results, as well as issuer- and enrollee-level results) is released (exact date forthcoming)

¹ If Package 3 submission is necessary, the IVA Entity will be instructed by CMS via email to provide the medical records for the remaining enrollees in the IVA sample through the HHS-RADV Audit Tool. IVA Entities are required to submit Package 3 as soon as possible, but no later than seven (7) calendar days from the date of the notification email.

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30-calendar day window after release of HHS-RADV Final Results Memo and issuer/enrollee-level results (February 2022 – March 2022)	2019 Benefit Year HHS-RADV Error Rate Calculation Discrepancy period (30-day discrepancy window) occurs (exact date forthcoming)
April 2022	Summary Report of 2019 Benefit Year HHS-RADV is released Note: Collection and payment of 2019 benefit year HHS-RADV adjustments will begin in early 2023
30-calendar day window after release of Summary Report of 2019 Benefit Year Risk Adjustment Data Validation Adjustments to 2020 Benefit Year Risk Adjustment Transfers	2019 Benefit Year SVA Findings Report Reconsiderations and Error Rate Methodology Reconsiderations period (30-day reconsideration window) occurs

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