

January 21, 2026

Exchange Risk Adjustment Overview and Documentation Guidance

What is Risk Adjustment?

Risk adjustment is a method used by the Centers for Medicare & Medicaid Services (CMS) to account for the overall health and expected medical costs of each individual enrolled in an Exchange plan. CMS uses a disease model to determine a risk “score” for each member. The model takes individual diagnosis codes and combines them into broader diagnosis groups, which are then refined into Hierarchical Condition Categories (HCCs). HCCs, together with demographic factors such as age and gender, are used to predict consumers’ total care costs. **That means providers must report consumers diagnosis information every year. The best time to do this is during the consumer’s annual physical. During this examination, each diagnosis should be evaluated and documented.**

Tools to help with HCC documentation requirements:

MEAT	TAMPER	SOAP
<ul style="list-style-type: none"> Monitor – signs, symptoms, disease progression/regression Evaluate – test results, medication effectiveness, response to treatment Assess – ordering tests, discussion, review of records, counseling, refer to another provider Treat – medications, therapies, other modalities 	<ul style="list-style-type: none"> Treat – medications, therapies, other modalities Assess – ordering tests, discussion, review of records, counseling Monitor – signs, symptoms, disease progression/regression Plan – what is being done about the patient’s condition Evaluate – test results, medication effectiveness, response to treatment Refer – sending the patient to another provider for treatment of the condition 	<ul style="list-style-type: none"> Subjective - experiences, personal views or feelings of a patient Objective - vital signs, physical exam findings, laboratory data, imaging results, other diagnostic data Assessment - combination of “subjective” and “objective” evidence to arrive at a diagnosis Plan - details the need for additional testing, consultation and any steps being taken to treat the patient.

(At least one element of MEAT/TAMPER/SOAP must be documented for each coded condition to qualify for HCCs)

Guidance for the most commonly missed or incorrectly coded conditions:

Cancer/Malignant Neoplasm Disease – Active/Current vs. Personal History	<ul style="list-style-type: none"> Active/Current Malignant Neoplasm - Assign the correct active neoplasm code for the primary malignancy until treatment is completed Personal History Of - When a primary malignancy has been excised or eradicated and there is no further treatment of the malignancy directed to that site, and there is no evidence of any existing primary malignancy, a
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	code from Category Z85
Congenital malformations, deformities and chromosomal abnormalities	<ul style="list-style-type: none">Assign an appropriate code(s) from categories Q00-Q99, Congenital malformations, deformations and chromosomal abnormalities when a malformation/deformation or chromosomal abnormality is documented anywhere within the noteCodes from Chapter 17 Congenital malformations, deformations and chromosomal abnormalities (Q00-Q99) of the ICD-10-CM Official Guidelines for Coding and Reporting may be used throughout the life of the patient.
Diabetes Mellitus: E08–E13 – Report any DM manifestations, including Status Codes	<ul style="list-style-type: none">Diabetic neurological complications (neuropathy)Other manifestations of diabetes mellitus (renal, ophthalmologic, oral, etc.)Diabetic circulatory complications (Skin ulcers, gangrene, PVD)Type 2 diabetic ketoacidosisOstomies/Artificial Openings – Colostomy, Gastrostomy, Ileostomy, etc.Amputation status – Lower Extremities (AKA, BKA, Feet/Toes)Long Term Insulin Use - Complications due to insulin pump malfunction
Disorders of psychological development: F01-F69	<ul style="list-style-type: none">F10-F09 Mental disorders due to known physiological conditionsF10-F19 Mental and Behavioral disorders due to psychoactive substance useF20-F29 Schizophrenia, schizotypal, delusional, and other non-mood psychotic disordersF30-F39 Mood (affective) disorders (Bipolar, MDD, Manic Episode, etc.)F40-F48 Anxiety, dissociative, stress-related, somatoform and other nonpsychotic mental disordersF50-F59 Behavior syndromes associated with psychological disturbances and physical factorsF60-F69 Disorders of adult personality and behavior
CVA, TIA, MI and Other Acute Vascular Conditions – Active/Current in an acute care setting vs. Personal History and Subsequent Care	<ul style="list-style-type: none">CVA Initial Care - A CVA is an emergent event that requires treatment in an acute care setting. To report CVA, refer to code category: I63.xx Cerebral infarction *4th and 5th digits identify location and causeAcute MI – A new myocardial infarction is considered acute from onset up to 4 weeks old. Acute myocardial infarction (AMI) may be reported in the acute care setting, following transfer to another acute setting, and in the post-acute settingSubsequent Care and Personal History - Once a patient has completed initial treatment and is discharged from the acute care setting, report as personal history of and any sequelae residual effects

Questions:

Thank you for your participation in our network and your continued commitment to the care of our members. If you have questions about this communication, please contact your Provider Network Account Executive or the Provider Services Department for your state.

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