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**DATE:** June 9, 2025

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

**FROM:** Vanessa S. Duran  
Director, Medicare Drug Benefit and C & D Data Group

Kathryn A. Coleman  
Director, Medicare Drug & Health Plan Contract Administration Group

Jennifer R. Shapiro  
Director, Medicare Plan Payment Group

**SUBJECT:** Reporting Requirements for HEDIS® Measurement Year (MY) 2025, HOS, and CAHPS® Measures, and Information Regarding HOS and HOS-M for Frailty

**Overview**

This memorandum contains the Healthcare Effectiveness Data and Information Set (HEDIS) measures required for submission on June 15, 2026, by all Medicare Advantage Organizations (MAOs) and other health plan organization types listed in Table 1. This memorandum also includes information about which contracts are required to participate in the Medicare Health Outcomes Survey (HOS) and Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey administered in 2026, as well as information regarding the timing of HOS and HOS-M survey administration. Finally, we include a reminder on the timing for release of information on the HOS and HOS-M to be used by fully integrated dual eligible (FIDE) Special Needs Plans (SNPs) that would like to be considered for frailty payments.

CMS has authority to collect various types of quality data under section 1852(e) of the Social Security Act (the Act) and use this information to develop and publicly post a 5-star rating system for Medicare Advantage (MA) plans based on its authority to disseminate comparative information, including about quality, to beneficiaries under sections 1851(d) and 1860D-1(c) of the Act. As codified at § 422.152(b)(3), Medicare health plans are required to report on quality performance data which CMS can use to help beneficiaries compare plans. Cost plans under section 1876 of the Act are also included in the MA Star Rating system, as codified at § 417.472(k), and are required by regulation (§ 417.472(j)) to make CAHPS survey data available to CMS.

## HEDIS MY 2025 Requirements

As part of the clinical quality reporting requirements, Medicare health plans must submit their HEDIS MY 2025 summary-level data to the National Committee for Quality Assurance (NCQA). Detailed specifications for HEDIS measures are included in the *HEDIS Measurement Year 2025 Volume 2: Technical Specifications for Health Plans*.

**Please note the new date and time for MY 2025.** All HEDIS MY 2025 audited summary-level data must be submitted to NCQA by 9:00 p.m. Eastern Time on June 15, 2026. There are no late submissions. For non-renewing Medicare-Medicaid Plans (MMPs), failure to report HEDIS measures may affect quality withhold payments, as articulated in the CMS Core Quality Withhold Technical Notes.

All health plan organizations that are new to HEDIS must become familiar with the requirements for submission to NCQA and make the necessary arrangements to collect the data as soon as possible. Information about the HEDIS audit compliance program is available at <https://www.ncqa.org/programs/data-and-information-technology/hit-and-data-certification/hedis-compliance-audit-certification/>. Table 1 indicates which organization types must report HEDIS, HOS, HOS-M, and CAHPS.

**Table 1: Organization Type and Quality Measure Reporting Requirements**

Organization Type	HEDIS	HOS	HOS-M	CAHPS
Section 1876 Cost contracts	✓	✓	✗	✓
Non-Renewing MMPs	✓	✗	✗	✗
HCPP-1833 Cost	✗	✗	✗	✗
Local Coordinated Care Plans (LCCP)	✓	✓	✗	✓
Medical Savings Account (MSA)	✓	✓	✗	✓
Programs of All-Inclusive Care for the Elderly (PACE)	✗	✗	✓	✗
Private Fee-for-Service (PFFS)	✓	✓	✗	✓
Employer/Union Only Direct Contract Local CCP	✓	✓	✗	✓
Employer/Union Only Direct Contract PFFS	✓	✓	✗	✓
Regional Coordinated Care Plans (RCCP)	✓	✓	✗	✓

(✗ = Not required to report ✓ = Required to report)

### HEDIS MY 2025 Summary-Level Data (also called HEDIS contract-level data)

CMS requires all contracts with an effective date of January 1, 2025 or earlier that are an organization type in Table 1 to collect and submit to NCQA audited HEDIS summary-level data (also called HEDIS contract-level data) for the quality measures listed in Table 2. There is no minimum member enrollment for submitting audited HEDIS summary-level data. Non-renewing MMPs will be required to submit HEDIS summary-level data for the measures in Table 2, but non-renewing MMPs will not be required to submit HEDIS Patient-Level Detail (PLD) data.

**Contract Closures:** If your Health Plan Management System (HPMS) contract status becomes “Withdrawn Contract” or “Terminated” with a termination date on or before June 15, 2026, then your contract is not required to submit HEDIS MY 2025 data. MMPs that terminate as of

December 31, 2025 are required to submit HEDIS MY 2025 data if they were in operation for the full 2025 contract year. All 1876 Cost contracts are required to submit HEDIS MY 2025 data regardless of enrollment closure status. Table 2 footnotes include information about the measure-specific submission exceptions for 1876 Cost contracts.

Contract Consolidations: If your organization consolidates one or more contracts during the change over from measurement to reporting year, then only the surviving contract is required to report audited HEDIS data including all members from all contracts involved in the consolidation.

Contract Merger or Novation: Organizations that merge or novate at any time throughout the measurement year up until the time of reporting must report audited summary HEDIS data for each contract in the organization.

**Table 2: HEDIS MY 2025 Summary Contract-Level Measures for Reporting<sup>1</sup>**

<b><i>Effectiveness of Care Measures</i></b>
<b>PCE</b> - Pharmacotherapy Management of COPD Exacerbation <sup>2</sup>
<b>CBP</b> - Controlling High Blood Pressure <sup>3</sup>
<b>PBH</b> - Persistence of Beta-Blocker Treatment After a Heart Attack <sup>2</sup>
<b>SPC</b> - Statin Therapy for Patients with Cardiovascular Disease <sup>2</sup>
<b>CRE</b> - Cardiac Rehabilitation
<b>GSD</b> - Glycemic Status Assessment for Patients With Diabetes <sup>3,4</sup>
<b>BPD</b> - Blood Pressure Control for Patients With Diabetes <sup>4</sup>
<b>EED</b> - Eye Exam for Patients with Diabetes <sup>3,4</sup>
<b>KED</b> - Kidney Health Evaluation for Patients With Diabetes <sup>3</sup>
<b>SPD</b> - Statin Therapy for Patients With Diabetes <sup>2</sup>
<b>OMW</b> - Osteoporosis Management in Women Who Had a Fracture
<b>OSW</b> - Osteoporosis Screening in Older Women
<b>FUH</b> - Follow-Up After Hospitalization for Mental Illness <sup>3</sup>
<b>FUM</b> - Follow-Up After Emergency Department Visit for Mental Illness <sup>3</sup>
<b>TRC</b> - Transitions of Care <sup>2</sup>
<b>FMC</b> - Follow-up After Emergency Department Visit for People with Multiple High-Risk Chronic Conditions
<b>PSA</b> - Non-Recommended PSA-Based Screening in Older Men
<b>DDE</b> - Potentially Harmful Drug-Disease Interactions in Older Adults
<b>DAE</b> - Use of High-Risk Medications in Older Adults
<b><i>Access/Availability of Care Measures</i></b>
<b>AAP</b> - Adults' Access to Preventive/Ambulatory Health Services
<b>IET</b> - Initiation and Engagement of Substance Use Disorder Treatment <sup>3</sup>
<b><i>Utilization and Risk-Adjusted Utilization Measures</i></b>
<b>PCR</b> - Plan All-Cause Readmissions <sup>2</sup>
<b>HPC</b> - Hospitalization for Potentially Preventable Complications <sup>2</sup>
<b><i>Health Plan Descriptive Information</i></b>
<b>ENP</b> - Enrollment by Product Line
<b><i>Measures Collected Using Electronic Clinical Data Systems</i></b>
<b>BCS-E</b> - Breast Cancer Screening <sup>3</sup>
<b>DSF-E</b> - Depression Screening and Follow-Up for Adolescents and Adults
<b>AIS-E</b> - Adult Immunization Status <sup>3</sup>
<b>COL-E</b> - Colorectal Cancer Screening <sup>3</sup>

<sup>1</sup> This does not include any of the HEDIS survey measures such as the measures collected through the HOS. The survey reporting requirements are listed later in the memo.

<sup>2</sup> Section 1876 Cost contracts do not report the following measures: PCE, PBH, SPC, SPD, TRC, PCR, and HPC.

<sup>3</sup> Rates stratified by race and ethnicity for MA and section 1876 Cost contracts are not transmitted to CMS for any measures, including the following measures where it is part of the HEDIS specification: CBP, GSD, EED, KED, FUH, FUM, IET, BCS-E, AIS-E, and COL-E.

<sup>4</sup> This measure is part of the former Comprehensive Diabetes Care measure set.

## HEDIS MY 2025 Patient-Level Detail data files

All organizations that submit HEDIS summary contract-level data are also required to submit audited HEDIS Patient-Level Detail (PLD) data files to CMS's HEDIS PLD contractor, with the exception of MMPs that terminate as of December 31, 2025. **All HEDIS PLD files must be submitted by 9:00 p.m. Eastern Time on June 15, 2026. There are no late submissions.**

The HEDIS PLD files will contain the member-level details for the summary contract-level data files. CMS will send its annual HPMS memorandum in fall 2025 with additional information about data submission of HEDIS PLD. There will be an optional dry run for HEDIS PLD data submission in April 2026.

## MY 2025 Plan Benefit Package (PBP)-Level Reporting for CCPs with SNPs and Non-Renewing MMP PBPs

In 2026, CMS will continue collecting audited PBP-level data from each PBP designated as a SNP offered by any CCP. A SNP PBP must have had 30 or more members enrolled as listed in the February 2025 SNP Comprehensive Report (this report can be found at this link: <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/MCRAAdvPartDENrolData/Special-Needs-Plan-SNP-Data>). SNP PBPs that meet the enrollment criteria must also exist in both the measurement year and reporting years. SNP PBPs that terminate as of December 31, 2025 are not required to report but may still do so voluntarily.

All SNP PBPs and non-renewing MMP PBPs must report the Care for Older Adults measure in Table 3. If a contract has multiple qualifying PBPs, then each qualifying PBP in the contract must report this measure in a separate submission.

**Table 3: HEDIS MY 2025 Measure for Reporting by SNPs and Non-Renewing MMP PBPs**

<i>Effectiveness of Care Measure</i>
<b>COA - Care for Older Adults (SNP- and MMP-only measure)<sup>5</sup></b>

<sup>5</sup> The pain assessment indicator was removed from the Care for Older Adults (COA) measure.

## HEDIS Contacts

Please send all questions about HEDIS measure specifications to NCQA's Policy Clarification Support System at [my.ncqa.org](https://my.ncqa.org). For other CMS questions about HEDIS, please email [HEDISQuestions@cms.hhs.gov](mailto:HEDISQuestions@cms.hhs.gov).

## 2026 HOS and HOS-M Reporting Requirements

### *Who Must Report HOS*

The following types of MAOs and other health plan organization types with Medicare contracts in effect on or before January 1, 2025 are **required** to report the Cohort 29 Baseline HOS in 2026 if they have a minimum enrollment of 500 members in February 2026 as reflected in the March 2026 monthly enrollment file<sup>6</sup> at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/MCRAAdvPartDENrolData>:

- All MAOs, including all CCPs, PFFS contracts, and MSA contracts
- Section 1876 Cost contracts even if they are closed for enrollment
- Employer/union only contracts

Non-renewing MMPs will not be required to participate in the Health Outcomes Survey (HOS) baseline and follow-up surveys administered in 2026.

In addition, all organizations that reported Cohort 27 Baseline Survey in 2024 are required to administer the Cohort 27 Follow-Up Survey in 2026. In the event of contract consolidations, mergers, or novations, surviving contracts must report Follow-Up HOS for all contracts involved. All eligible members of consolidated, merged, or novated contracts will be resurveyed and the results will be reported under the surviving contract. In the event of a contract conversion, the contract must report if their new organization type is required to report.

CMS excludes beneficiaries enrolled in I-SNPs at the PBP level from the HOS Baseline survey. HCPP 1833 Cost contracts are also excluded from the HOS administration. MAOs will receive further correspondence regarding HOS participation from NCQA by March 30, 2026.

### *Who Must Report HOS-M*

The HOS-M is an abbreviated version of the HOS used to assess the physical and mental health functioning of beneficiaries enrolled in PACE.

All PACE contracts in effect on or before January 1, 2025 are required by CMS to administer the HOS-M survey in 2026 if they have a minimum enrollment of 30 members as of February 2026 as reflected in the March 2026 monthly enrollment file at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/MCRAAdvPartDENrolData>. Eligible PACE organizations will receive further correspondence from NCQA regarding HOS-M participation by March 2, 2026.

### *HOS and HOS-M Survey Administration*

Organizations are required to contract with an approved HOS or HOS-M survey vendor and notify NCQA of their choice. Approved 2026 HOS and HOS-M survey vendors will be listed on [www.HOSonline.org](http://www.HOSonline.org).

For additional information on 2026 HOS or HOS-M, please email [HOS@cms.hhs.gov](mailto:HOS@cms.hhs.gov).

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<sup>6</sup> The March 2026 monthly enrollment file at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/MCRAAdvPartDENrolData> reflects enrollment in each contract as of the plan submission enrollment cut-off date for payment which is in February 2026.

### ***Optional Reporting of the HOS or HOS-M for FIDE SNPs for Frailty Consideration***

MAOs that anticipate sponsoring FIDE SNPs in the applicable payment year may elect to report HOS at the PBP level to determine their eligibility for a frailty adjusted payment, as discussed in CMS's Advance Notices and Rate Announcements.<sup>7</sup> Voluntary reporting at the plan level will be in addition to standard HOS requirements for quality reporting at the contract level. Plans that meet certain criteria, including a minimum PBP enrollment of 50 members as of February 2026 as reflected in the March 2026 monthly enrollment file at <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/MCRAAdvPartDENrolData>, may elect to report HOS-M. MAOs may elect to report HOS or HOS-M at the PBP level even if the MA contract is not required to report Baseline HOS due to low enrollment.

The HPMS memorandum containing information on optional reporting for FIDE SNPs and participation in the HOS or HOS-M for frailty consideration will be sent in early 2026. Please note that eligible FIDE SNPs that wish to participate in the 2026 HOS or HOS-M for frailty consideration must make their survey selection through HPMS unless otherwise noted. All selections must be submitted by the date indicated in the memorandum.

Questions regarding the HOS and HOS-M for frailty consideration can be submitted to the CMS Risk Adjustment Policy mailbox at [RiskAdjustmentPolicy@cms.hhs.gov](mailto:RiskAdjustmentPolicy@cms.hhs.gov).

### **2026 CAHPS Survey Requirements**

The following organization types are included in the CAHPS survey administration if they have a minimum enrollment of 600 eligible members as of July 1, 2025:

- All MAOs, including all CCPs, PFFS contracts, and MSA contracts
- Section 1876 Cost contracts even if they are closed for enrollment
- Employer/union only contracts

Non-renewing MMPs are not required to participate in the CAHPS survey administered in 2026; however, MMPs that transition to integrated D-SNPs as of January 1, 2026 may voluntarily elect to conduct the CAHPS survey in 2026. Integrated D-SNPs that choose to voluntarily conduct the CAHPS survey in 2026 but are not otherwise eligible for the survey will not have their CAHPS data included in the 2027 Part C and D Star Ratings. Integrated D-SNPs choosing voluntary implementation of the 2026 CAHPS survey should follow the instructions and deadlines in the 2026 Medicare CAHPS Survey HPMS memo that will be issued around mid-November.

PACE and HCPP 1833 Cost contracts are excluded from the CAHPS administration. Beneficiaries enrolled in I-SNPs are excluded from sampling.

Organizations are required to contract with an approved MA & PDP CAHPS vendor for the 2026 CAHPS survey administration. All approved CAHPS survey vendors for the 2026 survey administration will be listed on [www.MA-PDPCAHPs.org](http://www.MA-PDPCAHPs.org). CMS will issue additional information through HPMS about the CAHPS survey for 2026. For additional information on the CAHPS survey, please email [mp-cahps@cms.hhs.gov](mailto:mp-cahps@cms.hhs.gov).

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<sup>7</sup> <https://www.cms.gov/Medicare/Health-Plans/MedicareAdvtgSpecRateStats/Announcements-and-Documents>