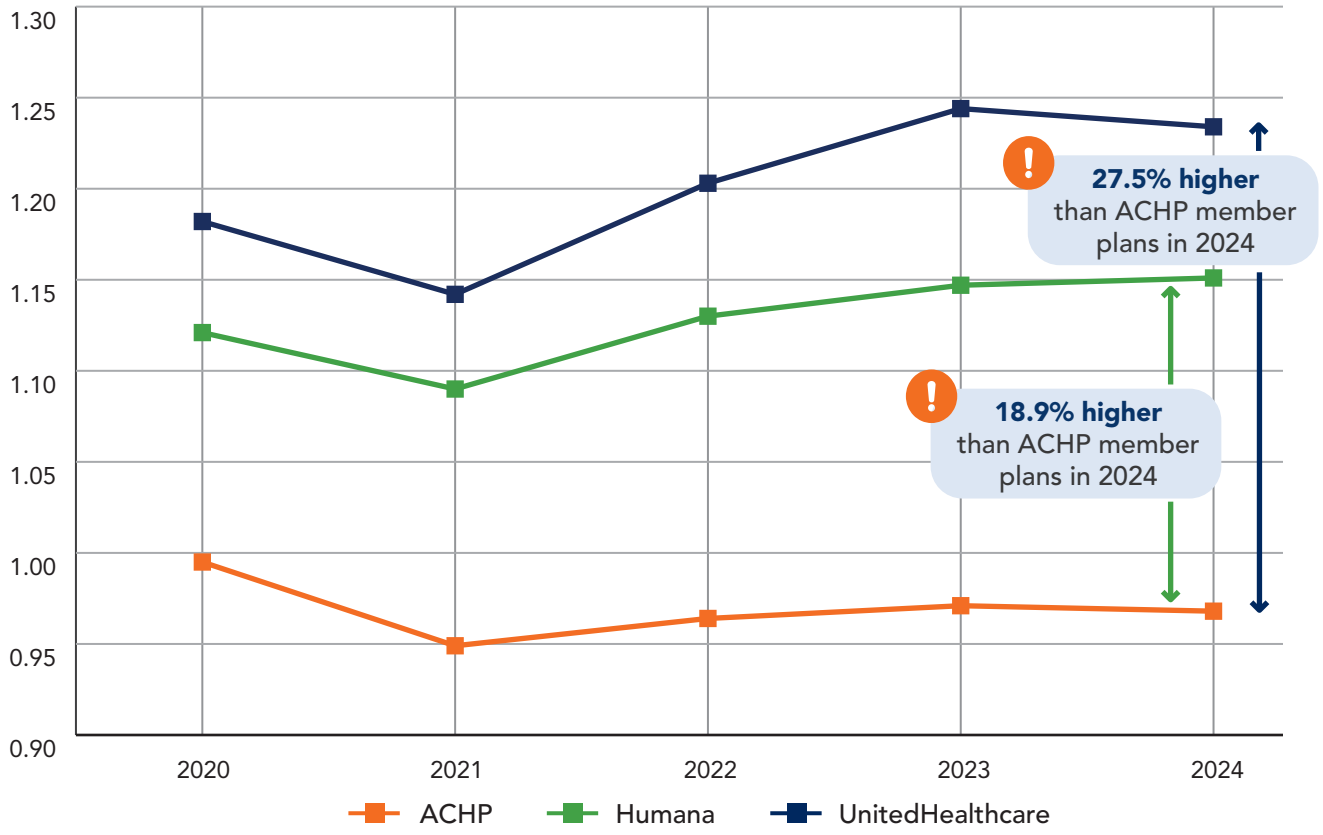
May 2026

The Failing MA Risk Adjustment Model:
Stifling Competition and Wasting Taxpayer Dollars

Risk adjustment payments provide insurers resources to care for seniors with complex and costly health needs. With all insurers having a mix of healthy and high-acuity seniors, the significant variation in risk adjustment is simply the result of abusing complexities in the current program. These abuses create an inequitable market, disadvantage consumers in regional health plans and cost taxpayers tens of billions of dollars.

Average MA Risk Scores by Insurer (2020–2024)



Source: ACHP analysis of Centers for Medicare & Medicaid Services (CMS) Medicare Advantage Part C Plan Payment Data (2019 to 2025) and CPSC Enrollment Information Files (2019 to 2025). Part C risk scores and payment data were enrollment-weighted. ACHP reflects ACHP membership as of May 2026.

Total average payment to plans per consumer in 2024:



UnitedHealthcare

$296.64 per consumer per year higher than ACHP member plans.

Humana

$173.76 per consumer per year higher than ACHP member plans.