

Skilled Nursing Facilities Begin Planning for Mandatory Off-Cycle Revalidations

Article By:

Jason D. Schultz

J. Michael Grubbs

Highlights

Skilled nursing facilities (SNFs) will receive notice of required off-cycle revalidation from their Medicare Administrative Contractor from October to December 2024

SNFs will have 90 days from the date of each letter to submit additional required information under the newly revised CMS-855A into the PECOS system or by paper application

The additional reporting requirements require SNFs to disclose new information regarding their ownership and contractual relationships

The Centers for Medicare & Medicaid Services (CMS) have begun issuing notice of off-cycle revalidations to all U.S. skilled nursing facilities (SNFs), which will be completed by December 2024. Once a SNF receives notification of off-cycle revalidation from their Medicare Administrative Contractor, it will have 90 days to submit the additional information required under the newly revised CMS-855A through either the PECOS system or by paper application.

The newly revised portions of the [CMS-855A](#) begin on page 52 of the application.

While the initial disclosure rules primarily focused on private equity and real estate investment trust ownership, the requested information on the newly revised CMS-855A goes much further. SNFs will be required to disclose a significant amount of new information regarding their ownership structure and contractual relationships, including tax identification numbers, Social Security numbers, and dates of birth.

In order to reduce confusion and clarify previous inconsistencies, CMS released [additional guidance](#) on Oct. 15, 2024.

Due to the public health emergencies declared as part of hurricane relief, revalidations for SNFs in Florida, Georgia, South Carolina, North Carolina, and Tennessee will not be due until May 1, 2025.

Key Takeaways

Due to the significant amount of additional information required to be submitted by SNFs over the next several months, SNFs should consider collecting all necessary information now. Since CMS has the authority to deny or revoke enrollment for providing misleading or false information on the revalidation application and to subject offenders to fines or imprisonment, SNFs may want to require attestations of their owners and contractual partners to ensure all collected information is accurate.

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National Law Review, Volume XIV, Number 295

Source URL: <https://natlawreview.com/article/skilled-nursing-facilities-begin-planning-mandatory-cycle-revalidations>