

Publications

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CMS Extends Revalidation Deadline for Skilled Nursing Facilities to August 1, 2025

In its April 17 MLN Newsletter, the Centers for Medicare and Medicaid Services (CMS) once again extended the deadline for skilled nursing facilities (SNF) to submit their off-cycle revalidation from May 1 to August 1, 2025.

This new deadline gives SNFs additional time to collect the ownership and Additional Disclosable Party (ADP) information necessary for the revalidation filing, and for many SNFs, the extension comes with a wave of relief.

In mid-March, the American Health Care Association and National Center for Assisted Living (AHCA/NACL) reported that fewer than 20% of SNFs had submitted their required revalidation applications. Based on our experience, even for those facilities that have submitted their revalidations, the applications have been frequently returned through development letters requesting additional information, often with multiple rounds of review to address deficiencies. Application development requests have varied widely depending on the analyst reviewing the application and the Medicare Administrative Contractor (MAC).

The inconsistencies in MAC responses and the ever-changing guidance by CMS have left many SNFs with more questions than answers. Most recently, CMS again updated its ADP revalidation guidance on April 9, 2025, to include additions in Section IV related to therapy providers and the FAQs to address requirements for ADPs.

To ensure a timely response to this newly extended deadline, plan ahead to gather the necessary information from ADPs and expect a long process of review, potentially with multiple rounds of inquiries from the MAC. Please review our previously published article to learn about the updated reporting requirements. If you have any questions or need assistance with your revalidation application, please contact a member of our Senior Housing and Long-Term Care group or our Licensing and Enrollment group.

Related People

- Sara Avakian
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