

# Publications

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## CMS Indefinitely Suspends SNF Ownership Disclosure Deadline

The Centers for Medicare & Medicaid Services (CMS) has issued updated sub-regulatory guidance announcing that the previously established **January 1, 2026 deadline** for Skilled Nursing Facilities (SNFs) to submit the new SNF Attachment to the Form CMS-855A has been **indefinitely suspended and as such, there is no submission deadline until further notice**.

This deadline suspension applies to all SNFs, including those that:

- Received a revalidation notice in October, November or December 2024; and
- Had an initial, revalidation, reactivation or change-of-ownership (CHOW) application pending as of October 1, 2024, and were instructed to complete the new SNF Attachment.

Although the mandatory deadline has been paused, CMS emphasizes that for SNFs that had initial, reactivation, revalidation or CHOW applications pending as of October 1, 2024, the applications will continue to process while awaiting the SNF Attachment submission, **but final approval of any currently pending enrollment action will not occur until the SNF Attachment is submitted**.

CMS also cautions that lengthy periods of inactivity on a revalidation application may lead to automatic deletion of the application and all saved data. CMS advises all SNFs to ensure that at least one edit or addition is made to any pending application at least every 120 calendar days to avoid automatic removal for inactivity. Applications that have been sent back for corrections should be submitted within 20 days, and applications that have been rejected should be reopened or modified within 60 days to avoid automatic deletion. Any saved change to any section of the application will reset the inactivity block and prevent the automatic removal from PECOS.

Although the submission deadline is now uncertain, the requirement to submit the extensive ownership, managerial and Additional Disclosable Party (ADP) information required SNF Attachment remains a requirement, so SNFs should continue to work towards the goal of updating their enrollment records appropriately. Please review our previously published article to learn about the disclosure and reporting requirements.

## Related People

- Elizabeth J. Tucker
- Sara Avakian

## Related Capabilities

- Health Care
- Licensure, Enrollment & Certification

Polsinelli's Senior Housing and Long-Term Care and Licensing and Enrollment teams are available to assist SNFs in evaluating their reporting obligations, preparing the SNF Attachment and navigating the evolving CMS enrollment guidance. Please contact us for guidance specific to your facility.