

## Insights

### Nursing Facility Revalidations: Another Delay, But This Time Indefinite

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In 2024, CMS issued regulations implementing certain requirements in the Affordable Care Act regarding the disclosure of ownership, managerial and other information for Medicare and Medicaid participating nursing facilities ("SNFs"). The new requirements included robust reporting requirements, requiring a plethora of information about owners, managers and the broadly defined "additional disclosable parties". The disclosure requirements only apply upon initial enrollment, a change of ownership, or a revalidation for SNFs. However, in September 2024, CMS notified SNFs that they would be revalidating enrolled SNFs from October to December 2024 to collect the newly required information. These revalidations were initially due May 1, 2025, which deadline was pushed in the 11th hour to August 1, 2025 and more recently January 1, 2026. However, on December 11, 2025, CMS issued an MLN Notice informing SNFs that the January 1, 2026 revalidation deadline is suspended *indefinitely*. While CMS instructs SNFs to continue collecting data on ownership, managerial, and related party information and submit their revalidation, there is no submission deadline until further notice.

This indefinite suspension of the revalidation deadline is likely welcome news due to the amount of information required to be submitted, and then the complicated nature of responding to the requests for additional information received from the Medicare Administrative Contractors. While this recent notice from CMS does not appear to impact SNFs' duty to submit the disclosure as part of any initial enrollment or change of ownership application, it does at least provide some relief for those providers subject to the recent revalidation process.

For questions about SNF disclosures and the revalidation process, please contact Meghan M. Linvill McNab.

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