

CMS Updates Guidance for Mandatory Off-Cycle SNF Provider Enrollment Revalidations

The Centers for Medicare and Medicaid Services (CMS) recently posted the [ninth update to sub-regulatory guidance for the SNF Mandatory Off-Cycle SNF Provider Enrollment Revalidation](#) process. This update includes three significant changes and updates of which providers need to be aware.

1. Whether payroll vendors need be disclosed

In **Section (IV)(B)(1)(ii)** that provides examples of categories of potentially disclosable parties, the Administrative Services category guidance now says that payroll vendors do not need to be reported as an additional disclosable party (ADP) as follows:

(ii) Administrative Services – Can involve services such as, but not limited to, compliance/oversight, human resources, public relations/outreach/advertising, technical assistance to the SNF’s main information system, etc. (This category does not include custodial, building security, and similar services. It also does not include EHR vendors or payroll vendors. Neither EHR vendors nor payroll vendors need be reported as ADPs in any of the ADP categories in this Section (IV)(B)(1).)

2. Submission of change of information when revalidation request is pending

In **Section (VI)(D)**, CMS clarifies that any Change of Information (COI) that occurs and is required to be submitted between now and before a SNF submits the mandatory of-cycle provider enrollment revalidation must still be submitted separately as required (see bold/italicized text).

The SNF must report the following changes described in the SNF Attachment within 30 days of the change:

- 5 percent or greater direct or indirect owners of the SNF
 - General or limited partners of the SNF (regardless of the percentage)
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- Managing organizations or employees of the SNF (as the term “managing employee” is defined in 42 CFR § 424.502). This includes Question 16 of the Individuals section regarding medical directors and administrators.
- Corporate officers of the SNF
- Corporate directors of the SNF
- Persons with a 5 percent or greater mortgage or security interest in the SNF

All other changes to data on the SNF Attachment must be reported within 90 days of the change.

If the SNF needs to report a change to any of the above-bulleted information before it submits its revalidation application, it should submit a Form CMS-855A change of information application.

3. Submission of change of ownership application when revalidation request is pending

In **Section (VI)(F)(2)** that provides additional clarification on data to be reported, CMS clarifies that if any CHOW transaction is submitted on or after October 1 (not “pending” as discussed in Section (I)(B) of the sub regulatory guidance document), then the SNF provider is not required to submit a separate off-cycle provider enrollment revalidation transaction, as all the required information will already be included in the CHOW submission (see bold/italicized text):

Revalidations: This assumes no CMS-855A CHOW application is pending.

CHOW expected to occur (and CHOW application will be – but has not yet been - submitted) before expiration of deadline to submit revalidation application – Except as stated below, the seller should submit the revalidation application as requested with information about the SNF’s current owners/managers/ADPs, etc., since it is possible the sale will not happen.

If the sale later does occur, the buyer must complete the full CMS-855A CHOW enrollment application, including the SNF Attachment.

Note that in all cases in this subsection (F)(2), if the buyer submits a CHOW application (including the SNF Attachment) before it submits its revalidation application, it need not complete the revalidation application. The SNF will be removed from the revalidation queue/cycle, and the MAC will notify the SNF.

Questions about these CMS updates or other SNF provider enrollment questions may be emailed to the [AHCA provider enrollment helpdesk](#).
