

HEALTH CARE INFORMATION MEMO

JULY 17, 2025

CMS Delays Deadline for Nursing Home Federal Disclosures – August 1, 2025, Has Become January 1, 2026: Consider Support from Bond to Navigate the Complex Process

The Centers for Medicare and Medicaid Services (“CMS”) will be extending the deadline for the mandatory off-cycle revalidation process for Medicare-certified skilled nursing facilities (SNFs). The revised deadline is Jan. 1, 2026, as confirmed by CMS via email: CMS is expected to issue formal public notice in the coming days.

Bond reported on the requirement earlier this year – a link to that coverage is [here](#). Recall that CMS substantially updated Form 855A, as of Oct. 1, 2024, in a move that incorporated numerous new requirements such as enhanced reporting of nursing homes’ ownership, governance and managerial controls. Moreover, CMS are requiring data on so-called Additional Disclosable Parties (“ADPs”), including certain contractors. As we noted in our earlier communication, the changes affect entities enrolling in Medicare and Medicaid, revalidating, submitting changes or navigating changes of ownership. CMS has pushed back the compliance deadline previously – the Aug. 1, 2025 deadline had represented its most recent preceding extension.

Bond reiterates its offer to provide you with dedicated working sessions with your compliance team to review your updates and ensure all necessary elements are accurately reported. Please contact Bond attorney Kaydeen Maitland at [Kaydeen M. Maitland \(kymaitland@bsk.com\)](mailto:Kaydeen.M.Maitland@bsk.com) to schedule a session. If you have further questions, please contact [John F. Darling \(darlinj@bsk.com\)](mailto:John.F.Darling@bsk.com), [Gabriel S. Oberfield \(goberfield@bsk.com\)](mailto:Gabriel.S.Oberfield@bsk.com) or any other Bond attorney with whom you work regularly.

