HEALTH CARE AND LONG TERM CARE INFORMATION MEMO

MARCH 28, 2025

Nursing Homes Must Beef Up Their Federal Disclosures by May 1, 2025: Consider Support from Bond to Navigate the Complex Process

Bond's health care and long term care practice groups want to ensure you're ahead of the curve on a compliance requirement that will affect the nation's skilled nursing facilities and, potentially, the organizations they work with.

The Centers for Medicare and Medicaid Services (CMS) substantially updated Form 8555A, as of Oct.1, 2024, which has triggered numerous new requirements that must be satisfied by May 1, 2025 – a deadline **just weeks away**. CMS calls for enhanced reporting of nursing homes' ownership, governance and managerial controls – and CMS calls for data on so-called Additional Disclosable Parties (ADPs) that includes certain contractors. The changes affect entities enrolling in Medicare and Medicaid, revalidating, submitting changes or navigating changes of ownership. The disclosure process is designed in part so that CMS can learn more about parties that exercise control or provide significant services to facilities – including board members, certain trustees and managing employees. SNFs must also diagram where they fit in vis-à-vis associated entities, and delineate levels of ownership and control.

Bond offers dedicated working sessions with your compliance team to review your updates and ensure all necessary elements are accurately reported. We expect our guidance will help you navigate these requirements effectively, and on time – minimizing the risk of submission errors and delays in approval. Please contact Bond attorney Kaydeen Maitland (kmaitland@bsk.com) to schedule a session. If you have further questions, please contact Maitland, John Darling (darlinj@bsk.com), Gabriel S. Oberfield (goberfield@bsk.com), or any other Bond attorney with whom you work regularly.



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