



# **Skilled Nursing Facility Validation Program: Frequently Asked Questions (FAQs)**

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## ***General Skilled Nursing Facility Value-Based Purchasing Program Information***

### **1. What is the Skilled Nursing Facility (SNF) validation program?**

The SNF validation program is an audit-based program established to assess the accuracy of Minimum Data Set (MDS)-based quality measures used in the SNF Value Based Purchasing (VBP) and Quality Reporting Programs (QRPs). The SNF validation program has been established in response to Section 1888(h)(12) of the Social Security Act that requires the Secretary to apply a validation process to SNF VBP and QRP measures. In the SNF Prospective Payment System (PPS) fiscal year (FY) 2024 final rule (CMS-1779-F), CMS specified that a validation process for MDS-based measures would be implemented to ensure accurate quality data beginning with the FY 2027 program year/FY 2025 performance period.

### **2. Which SNFs are eligible for the validation audit?**

SNFs that submitted at least one MDS assessment record in the previous calendar year and have submitted at least one MDS assessment record in the current fiscal year are eligible for selection.

### **3. Who is performing the validation audits?**

Healthcare Management Solutions, LLC. (HMS) is the validation program contractor conducting the audits. HMS has an executed Data Use Agreement (DUA) with CMS and has the authority granted by CMS to request and receive medical charts. No additional DUAs or other agreements are required to transmit medical charts to HMS.

### **4. When will SNF validation audits begin?**

The SNF validation program is scheduled to begin in August 2025.

## ***Selection for Validation Audit***

### **5. How are SNFs selected for the SNF validation program?**

SNFs are selected randomly from all SNFs eligible for the validation program. SNFs can only be selected once within a fiscal year.

### **6. How are SNFs informed of the selection for audit?**

SNFs selected for audit will be notified through their Internet Quality Improvement and Evaluation System (iQIES) Provider folder. The audit notification will contain instructions for documentation submission, the list of sampled residents for which medical charts are being requested and contact information for the contractor conducting the audit.

### **7. How do SNFs access their iQIES Provider folder to locate their audit notification?**

SNFs can locate their audit notification using the following instructions:

1. Log into iQIES at <https://iqies.cms.gov/> using your Health Care Quality Information Systems (HCQIS) Access Roles and Profile (HARP) user ID and password.
  - a. If you do not have a HARP account, you may [register for a HARP ID](#).
2. In the Reports menu, select My Reports.

3. From the My Reports page, locate the MDS 3.0 Provider Preview Reports folder. Select the MDS 3.0 Provider Preview Reports link to open the folder.
4. Here you can browse to locate the Audit Notification Letter.

#### **8. When are SNFs informed of their selection for audit?**

SNFs begin receiving audit notifications if they are selected for audit in August 2025.

### ***Submitting SNF Points of Contact***

#### **9. Why do SNFs need to identify points of contact (POCs)?**

SNFs need to identify and submit POCs so that there are designated SNF staff that can be contacted during the audit process to receive email notifications about successful upload of files, successful submission of all requested documentation, and notification regarding issues with the medical chart documentation.

#### **10. How can SNF POC information be updated/revised?**

To revise or update POC information, return to the original POC link provided in the SNF audit notification letter. Click on the original POC link that was provided within that letter and enter revised POC information. This will automatically update the SNF POC information.

### ***Validation Audit Requirements***

#### **11. What are the validation program requirements to ensure SNF compliance?**

SNFs are required to submit all requested medical chart documentation within 45 days of receipt of their audit notification. Any selected SNF that fails to submit requested medical chart documentation within 45 days of the audit notification will be considered noncompliant.

#### **12. What information does the SNF need to submit for audit to remain in compliance?**

SNFs are required to submit medical chart documentation to support the validation of data of 10 MDS assessment records. Audit notification letters will provide detailed data requests for resident medical charts associated with the sampled MDS assessment record.

#### **13. How long does a SNF have to respond to the validation program to ensure they remain in compliance with the validation program requirements?**

SNFs have 45 days from receipt of the audit notification letter to respond to the validation program's request for medical chart documentation to remain in compliance with validation program requirements.

### ***Medical Chart Documentation Submissions***

#### **14. How does a selected SNF submit medical chart documentation to the validation program?**

SNFs submit requested medical chart documentation through a secured portal. The URL to a SNF's secured portal is included in the audit notification letter along with detailed instructions on how to

upload files.

**15. What format should medical chart documentation be submitted in?**

Medical chart documentation must be provided in PDF format; no other formats will be accepted.

**16. How is medical chart documentation prepared before submission?**

Detailed instructions on how to prepare medical chart documentation for submission are included in the audit notification letter.

**17. What naming convention should be used when submitting requested medical chart documentation?**

Each resident's medical chart documentation should be bundled into a single PDF file and use the following naming convention: "CCN\_MDS Record ID."

**18. What timeframe should be included in the medical chart documentation submitted?**

The audit notification letter includes detailed instructions on the specific date range to be covered in the medical chart documentation submission.

**19. What should be included in the medical chart documentation submission?**

Medical charts must be submitted following the submission instructions provided with the audit notification letter. All submission methods are secure and protect personally identifiable information/protected health information (PII/PHI).

**20. What should NOT be included in the medical chart documentation submission?**

Medical chart documentation should NOT contain any resident social security numbers or resident face sheets.

**21. How will a SNF know that their medical chart documentation has been received?**

SNF POCs will receive automated email notification when files have been successfully uploaded. This email will be sent to both designated POCs and include the count of files successfully uploaded.

**22. How will a SNF know that medical chart documentation has been accepted?**

SNF POCs will receive an automated email notification once all requested medical chart documentation has been verified as submitted.

***Security Concerns***

**23. How is the medical chart documentation that is submitted for the validation audit kept protected?**

All documentation for the validation program is stored in the CMS SharePoint environment. The CMS SharePoint environment employs a robust security framework that includes encryption, access controls, and compliance features to safeguard files. Access to the environment is limited to only CMS trusted networks. SharePoint uses BitLocker disk-level encryption and per-file encryption to protect data stored on its servers. BitLocker encrypts all data on a disk, while per-file encryption assigns a unique encryption key to each file. This encryption uses Advanced Encryption Standard

(AES) with 256-bit keys, compliant with Federal Information Processing Standard (FIPS) 140-2. Data transmitted between clients and SharePoint servers is protected using SSL/TLS connections with 2048-bit keys. This ensures that data sent over the internet is secure and cannot be intercepted by unauthorized parties. In addition, to the built-in SharePoint security, CMS also enforces a need-to-know approach to its file sharing. This means that only users who have a legitimate need to access specific files are granted permission. All users are vetted and approved before being granted access.

### ***Validation Audit Results***

#### **24. How will SNFs be notified of the results of their audit?**

At the conclusion of the audit, SNFs will receive a Summary Audit Scoring Report via iQIES. The report will contain the SNF's audit results for each measure and MDS item, including detailed results from each sampled assessment and medical chart audited. The reports are for informational purposes only; SNFs will not be penalized for their audit results.

#### **25. When should SNFs expect to receive their audit report findings?**

SNFs will receive their Summary Audit Scoring Report within three months following the medical chart documentation submission deadline.

### ***Validation Program Penalties***

#### **26. What are the penalties if a SNF does not comply with validation program requirements?**

For the FY2025 performance year/FY2027 program year, noncompliance will result in notification to CMS and a 2% reduction of a SNF's Annual Payment Update for the FY2027 SNF QRP program year in accordance with Section 1888(e)(6)(A) of the Act.

#### **27. How will a SNF be notified if they are found to be noncompliant with the validation program?**

Selected SNFs will receive a Summary Audit Scoring Report that will include a notification that they were noncompliant with the Validation Program. SNFs will also receive a non-compliance notification letter from their Medicare Administrative Contractor (MAC). More information regarding the notification of noncompliance can be found here:

<https://www.cms.gov/medicare/quality/snf-quality-reporting-program/reconsideration-and-exception-extension>

#### **28. What appeal process is available if a SNF disagrees with the validation program's finding of noncompliance?**

SNFs may file for reconsideration if they believe the finding of noncompliance is in error. A SNF that disagrees with the compliance determination and the impending payment reduction decision may submit a request for reconsideration to CMS within thirty (30) days from the date at the top of the noncompliance notification letter. CMS will not accept any requests submitted after the 30-day deadline.

SNFs are required to submit their request to CMS via email with the subject line: "SNF QRP Reconsideration Request" and include the SNF CMS Certification Number (CCN) (e.g., SNF QRP



Reconsideration Request, XXXXXX). The request must be sent to the following email address: SNFQRPreconsiderations@cms.hhs.gov.

For additional details on what must be included in your request, please review instructions here: <https://www.cms.gov/medicare/quality/snf-quality-reporting-program/reconsideration-and-exception-extension>

## **Additional Resources**

### **29. Who do SNFs contact if they have issues submitting documentation or have general questions about the SNF Validation Program?**

Starting July 1, 2025, SNFs may contact the SNF Validation Help Desk at snfvalidation@hcmsllc.com to aid with the audit process and answer any questions. The Help Desk's operating hours are Monday through Friday from 8:00 AM to 6:00 PM Eastern Time.