



CMS FY 2027

Skilled Nursing Payment & Policy Changes

+2.4% Proposed payment increase

- **NO OVERHAUL:** SNF PPS STRUCTURE REMAINS INTACT FOR FY 2027
- **ALL PAYERS:** MDS REPORTING PROPOSED FOR ALL RESIDENTS REGARDLESS OF PAYER
- **45 DAYS:** NEW DATA SUBMISSION WINDOW, DOWN FROM 4.5 MONTHS (FY 2029)

NEW OVERSIGHT TOOL

Case-Mix Integrity

CMS focus on "case-mix creep"

CMS is seeking input on how to measure and adjust for coding-driven payment increases – distinguishing genuine patient complexity from documentation-driven growth. This signals future scrutiny of SNF coding patterns and a potential recalibration of PDPM-based reimbursement.

Outlier Payment Update

1. Revised outlier methodology improves access to care for high-cost patients
2. Limits financial risk for facilities treating complex, resource-intensive cases

Quality Reporting Changes

1. COVID-19 vaccination measures removed for patients and personnel
2. RFI on advanced care planning quality measure

Expanded Data Reporting

1. Mandatory MDS reporting for all residents regardless of payer source
2. Creates more comprehensive, standardized cross-payer data collection

Wage Index Reform

1. Exploring BLS data as alternative to current wage index methodology
2. Goal to better reflect actual geographic labor costs for SNFs

Data Submission Timeline – What's Changing

NOW → FY 2028

2028

FY 2029 (PROPOSED)

SNFs have 4.5 months after each quarter end to submit QRP data, creating a significant lag in public reporting and performance visibility.

Submission window shrinks to 45 days. CMS says this reduces public reporting lag and gives SNFs faster access to data for quality improvement initiatives.

What This Means for Skilled Nursing Facilities

- Ensure Coding Accuracy: Validate case-mix trends and identify documentation-driven inflation
- Act on Faster Insights: Leverage data to improve quality performance and operational decisions



Ensure Coding Accuracy:

Validate case-mix trends and identify documentation-driven inflation



Act on Faster Insights:

Leverage data to improve quality performance and operational decisions

