

CMS to Begin VBP and QRP Validation Audits This Fall

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CMS has indicated that they will begin the [Skilled Nursing Facility Validation Program](#) in the Fall of 2025. The SNF Validation Program was established to assess the accuracy of MDS-based quality measures used for the Quality Reporting Program (QRP) and Value Based Purchasing Program (VBP). The validation program will begin with the FY 2025 performance period (FY 2027 program year).

The audits will be conducted by Healthcare Management Solutions, LLC (HMS), and all SNFs who submitted at least one MDS assessment in the previous calendar year, and at least one MDS assessment in the current fiscal year are eligible for review. The selection process will be random, and SNFs may only be chosen for audit once within a fiscal year. During the audit, SNFs will be required to submit validation information to support 10 MDS assessments. Providers will need to submit all requested documentation within 45 calendar days of the audit notification to remain in compliance.

SNFs will be informed of the audit through the iQIES system. The notification will be found in the MDS 3.0 Provider Preview Reports folder. This notification will contain all information related to the charts requested for audit, and instructions for submission. SNFs will need to identify a point of contact (POC) who will receive audit-related emails and communication.

Following the audit, SNFs will receive a Summary Audit Scoring Report via iQIES. This report will include detailed information regarding the audit findings. At this point, the audits are for informational purposes only and will not carry any penalties; however, it is important to note that if a community is out of compliance with submission of records for review, they may face a 2% reduction in the SNF's Annual Payment Update for the 2027 fiscal year. If a community is found to be out of compliance, they will receive a non-compliance notification from their Medicare Administrative Contractor (MAC), and there will be a chance to appeal this decision.

What can your community do now to prepare? MDS Coordinators should begin monitoring the iQIES Provider Preview Reports folder for any communication from CMS. Ensure there is a back up team member to monitor iQIES notifications if the MDS Coordinator is unavailable. Implement audits to ensure accuracy of MDS data. Stay informed regarding MDS and audit changes through News Bites and the [EFOHCA](#) programs.

If you have questions regarding the program, please contact Tammy Cassidy, with OHCA, or the SNF Validation Help Desk at snfvalidation@hcmsllc.com. CMS has also provided a Frequently Asked Questions document which is available for your review at this [link](#).