



GREATER NEW YORK HEALTH CARE FACILITIES ASSOCIATION

519 Eighth Avenue, 16th Floor, New York, NY, 10018

Phone: 212-643-2828 Fax: 212-643-2956 www.gnyhcfa.org

Memo 26-19

To: Administrator, Medical Director, DON, MDS Coordinators, Business Office, and QA Committee

From: Nelia Adaci RNC, BSN, RAC-MT, RAC-MTA, COO, The CHARTS Group & GNYHCFA Consultant & Mary Gracey-White RN, BSN, QCP, Director of Regulatory Compliance

Date: April 8, 2026

Re: CMS Releases FY 2027 SNF PPS Proposed Rule – Highlights and Comment Deadline

The Centers for Medicare & Medicaid Services (CMS) released the **FY 2027 Skilled Nursing Facility (SNF) Prospective Payment System (PPS) Proposed Rule on April 2, 2026**. The **public comment deadline is June 1, 2026**, and we encourage providers to review the proposal carefully and consider submitting feedback.

Below is a summary of the key provisions and proposals most relevant to SNF operators:

Payment Rate Updates

- CMS proposes a **2.4% net increase** to SNF PPS rates for FY 2027, reflecting: + 3.2% SNF market basket update and - 0.8% productivity adjustment
- CMS proposes **no substantive changes** to the PDPM ICD-10 mappings for FY 2027.

PDPM Case-Mix Creep – Request for Information (RFI): CMS continues to express concern regarding potential PDPM case-mix growth (e.g., coding of malnutrition, swallowing disorders, depression, etc.) and is seeking stakeholder feedback on potential corrective approaches, including the following methods:

- **Component-level adjustments** (e.g., increases to PT/OT and reductions to SLP, NTA, and Nursing), or
- A **system-wide adjustment factor of 0.957**, equivalent to an approximate **3.6% overall payment reduction**.

SNF Quality Reporting Program (QRP)

- **Measure Removals (Effective FY 2028):** COVID-19 Vaccination Coverage Among Healthcare Personnel (HCP) and COVID-19 Vaccine: Percent of Patients/Residents Who Are Up to Date
- **Revised Data Submission Deadlines (Effective FY 2029):** Data must be submitted by the **15th day of the second month following the end of each quarter**, replacing the current 4.5-month timeframe.
- **Expanded MDS Submission (Effective FY 2031):** SNFs would be required to submit MDS data for **all residents receiving skilled care, regardless of payer**.
- CMS also seeks feedback on **Advanced Care Planning (ACP)** as a potential future QRP quality measure.

SNF Value-Based Purchasing (VBP) Program

- Establishes **estimated performance standards** for **FY 2029 and FY 2030**, including measures related to Hospital readmissions, Nurse staffing, Discharge function scores.
- **Snapshot Date Alignment:** Beginning in FY 2027, snapshot dates for MDS-based measures will align with the revised SNF QRP submission deadlines.
- Updates are proposed to the **review and correction policies** for MDS-based quality measures.

To learn more on this, please be sure to register for the GNYHCFA Seminar that will be held on April 30, 2026! Register [HERE](#)

Comments must be submitted in one of the following three ways (please choose only one of the ways listed):

1. *Electronically*. You may submit electronic comments on this regulation to <http://www.regulations.gov>. Follow the “Submit a comment” instructions.

2. *By regular mail*. You may mail written comments to the following address *only*:

Centers for Medicare & Medicaid Services,
Department of Health and Human Services,
Attention: CMS-1843-P,
P.O. Box 8016, Baltimore, MD 21244-8016.

Please allow sufficient time for mailed comments to be received before the close of the comment period.

3. *By express or overnight mail*. You may send written comments to the following address *only*:

Centers for Medicare & Medicaid Services,
Department of Health and Human Services,
Attention: CMS-1843-P, Mail Stop C4-26-05,
7500 Security Boulevard, Baltimore, MD 21244-1850.

Additional Resources

- **FY 2027 SNF Proposed Payment Rule (Federal Register):**
<https://www.federalregister.gov/d/2026-06674>
- **SNF Value-Based Purchasing Program:**
<https://www.cms.gov/medicare/quality/nursing-home-improvement/value-based-purchasing>
- **SNF Quality Reporting Program:**
<https://www.cms.gov/medicare/quality/snf-quality-reporting-program>