

Key Application Actions and Deadlines

For Agreement Period Beginning on January 1, 2026

Submit Phase 1 of the Application

Opens: May 29, 2025
Due: June 12, 2025

ACOs will complete:

- ACO-MS Registration

ACOs will submit:

- ACO Participant List (including executed ACO Participant Agreements)
- Banking Information
- Skilled Nursing Facility (SNF) 3-Day Rule Waiver application*
- SNF Affiliate List (including executed SNF Affiliate Agreements)*
- Draft repayment mechanism (RM) documentation*

ACOs will select:

- BASIC or ENHANCED track
- Minimum savings rate/minimum loss rate*
- Beneficiary assignment methodology

ACOs receive:

- Immediate beneficiary assignment estimates for each ACO Participant TIN at submission

Respond to Phase 1 RFI-1

Opens: July 11, 2025
Due: Aug. 1, 2025

Available actions:

- Review Application Cycle Subtab in ACO-MS
- Update Banking Information
- Update draft RM documentation*
- Correct any deficiencies identified by CMS and/or modify responses submitted within Section 2 of your Phase 1 application task

Final opportunity to:

- Add ACO participant and/or SNF affiliate TINs
- Elect to apply for a SNF 3-Day Rule Waiver application*

ACOs receive:

- Participation Options Report in ACO-MS
- Estimated RM amount
- Immediate beneficiary assignment estimates for each ACO Participant TIN at submission

⚠️ Your ACO *cannot* edit responses in Phase 1 Section 1: ACO Information within your Phase 1 application task.

Respond to Phase 1 RFI-2

Opens: Aug. 27, 2025
Due: Sept. 8, 2025

Available actions:

- Review Application Cycle Subtab in ACO-MS
- Update Banking Information
- Submit final RM documentation*

Final opportunity to:

- Upload executed agreements and merger/acquisition documentation and change the merged/acquired indicator on pending change requests
- Withdraw or delete ACO participants
- Withdraw SNF affiliates
- Complete SNF 3-Day Rule Waiver application*
- Correct any deficiencies identified by CMS and/or modify responses submitted within Section 2 of your Phase 1 application task

ACOs receive:

- Participation Options Report in ACO-MS
- Final repayment mechanism amounts

⚠️ Your ACO *cannot* add/edit any ACO participant or SNF affiliate TINs, or edit information in Phase 1 Section 1 of the application

Phase 1 Dispositions

Issued: Oct. 16, 2025

CMS makes available:

- ACO Participant List and SNF Affiliate List dispositions
- Beneficiary assignment eligibility Phase 1
- AIP eligibility final disposition
- PSS eligibility final disposition

Submit Phase 2 of the Application

Opens: Oct. 17, 2025
Due: Oct. 28, 2025

ACOs will submit:

- ACO's governing body and organizational chart
- Governing body narrative*
- AIP supplemental information, inclusive of spend plan*
- Beneficiary Incentive Program (BIP) application*
- PSS supplemental information, inclusive of spend plan*

⚠️ Your ACO *cannot* modify any information submitted within the Phase 1 application task, including the ACO Participant List and SNF Affiliate List

Respond to Phase 2 RFI

Opens: Nov. 7, 2025
Due: Nov. 14, 2025

Final opportunity to:

- Correct any deficiencies on Phase 2 elements identified by CMS
- Modify any responses submitted within Phase 2 of your application task

⚠️ Your ACO *cannot* modify any information submitted within the Phase 1 application task, including the ACO Participant List and SNF Affiliate List

Final Application Dispositions

Issued: Dec. 4, 2025

CMS makes available:

- Application dispositions
- SNF 3-Day Rule Waiver disposition*
- BIP disposition*
- AIP disposition*
- PSS disposition*

Annual Signing Event

Opens: Dec. 5, 2025
Due: Dec. 11, 2025

ACOs must:

- Review, certify, and electronically sign documents related to your participation in the Shared Savings Program
- Confirm your organization's information (e.g., ACO legal entity name (LEN), ACO TIN, ACO business address) and contact information

All dates subject to change. Deadlines are 12:00 p.m. (noon) Eastern Time on the dates listed.
*Only applies to certain ACOs.

Disclaimer: This communication material was prepared as a service to the public and is not intended to grant rights or impose obligations. It may contain references or links to statutes, regulations, or other policy materials. The information provided is only intended to be a general summary. It is not intended to take the place of either the written law or regulations. We encourage readers to review the specific statutes, regulations, and other interpretive materials for a full and accurate statement of its contents. This document is published, produced, and disseminated at U.S. taxpayer expense.