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CMS Audit Prep Calendar (2025–26)

Deadlines, Deliverables, and Internal Milestones for Year-Round Program Audit Readiness

2025 CMS Program Audit Cycle Timeline

Month	CMS Activity/Event	What Health Plans Should Do
Jan 2025	CMS finalizes audit strategy and targets	Run internal audit review + validate last year's CAPs
Mar 2025	Program Audit notices begin	Simulate audit logic across CDAG, ODAG, SNP-MOC, CPE, FA
Apr 2025	Universe file submission deadlines	Automate universe generation and validate formats
May–Jun	Audit fieldwork begins (remote/document pulls)	Prep document repositories and stakeholder interview notes
Jul–Aug	ICARs and Conditions issued	Submit CAPs; track issues and timelines centrally
Sep–Oct	CAP follow-ups, validation audits	Run mock audits; finalize root cause logs
Nov–Dec	Planning for 2026 audit	Update internal SOPs; roll forward learnings from 2025

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2026 CMS Program Audit Cycle (Expected)

Month	CMS Activity/Event	Plan Milestones
Jan 2026	CMS updates protocols and reporting changes	Update policies and prepare templates for new rules
Feb 2026	Early focus audit notices	Validate delegated entities' readiness
Mar–Apr	Likely start of new Program Audit round	Ensure universe scrubbers and CMS logic are up to date
May–Jul	Active audits + documentation pulls	Use dashboards to track CAP status and audit progress
Aug–Oct	Findings issued and CAP monitoring	Apply AI to summarize findings and map to systemic fixes
Nov–Dec	Internal audit retrospective and prep	Recalibrate readiness tools, especially for newer contracts

Suggested Internal Checkpoints (for all plans)

Quarter	Internal Milestone
Q1	Mock audit simulation + Universe dry run
Q2	Delegation oversight review + CAP scoring
Q3	Audit dashboard update + staff training
Q4	Annual retrospective + 2026 SOP update

Included Audit Areas to Cover Internally

- CDAG (Coverage Determinations, Appeals & Grievances)
- ODAG (Organization Determinations, Appeals & Grievances)
- SNP-MOC (Special Needs Plan Model of Care)
- FA (Formulary and Benefits Administration)
- CPE (Compliance Program Effectiveness)
- FWA (Fraud, Waste, and Abuse)
- Delegation Oversight
- Universe File Validation
- CAP Management & Remediation

Use this calendar to lead your team into a year of audit confidence.

Ready isn't reactive, it's intentional.

Whether you need to generate clean universes, simulate audits, manage CAPs, or streamline delegation oversight, Inovaare offers solutions and services to support your complete audit readiness.