

Department of Health & Human Services  
Centers for Medicare & Medicaid Services  
61 Forsyth Street, SW, Suite 4T20  
Atlanta, Georgia 30303-8909



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**IMPORTANT NOTICE – PLEASE READ CAREFULLY**  
(Receipt of this Notice is Presumed to be December 17, 2018, --Date Notice E-mailed)

December 17, 2018

Attn: Ellen Burton, MPH  
University of Indianapolis  
Center for Aging and Community  
1400 E. Hanna Avenue  
Indianapolis, IN 46227-3630  
[burtones@uindy.edu](mailto:burtones@uindy.edu)

**Re: Request for State Use of CMP Funds**  
**Quality Improvement in Long Term Care Project**  
**2018-04-TN-0709**  
**CMP Fund Request Approved \$495,732.64**

Dear Ellen Burton:

Sections 1819(h)(2)(B)(ii)(IV)(ff) and 1919(h)(3)(C)(ii)(IV)(ff) of the Social Security Act incorporate specific provisions of the Patient Protection and Affordable Care Act pertaining to the collection and uses of civil money penalties (CMPs) imposed by the Centers for Medicare & Medicaid Services (CMS) when nursing homes do not meet requirements for long term care facilities. In accordance with 42 CFR § 488.433 and CMS Survey & Certification Memo 12-13-NH (effective January 1, 2012) States must obtain approval from CMS for the use of federally imposed CMP funds.

Our office has reviewed the proposal submitted by University of Indianapolis, Center for Aging & Community (CAC) for \$495,732.64 to develop and implement a statewide system of Regional Healthcare Quality Improvement Collaboratives that bring together Tennessee nursing facilities for quality improvement. This is a two-year project. CAC will establish an Advisory Group, recruit TN nursing homes, and provide technical assistance through centralized education, group webinars, coaching and individual conference calls to participating TN nursing homes. In addition, CAC shall conduct onsite visits and provide tools and resources in the form of toolkits for participating long term care facilities. Each nursing home shall complete a quality assurance performance improvement (QAPI) self-assessment and a minimum of two quality improvement projects. One project shall be related to healthcare associated infections (HAI) and infection prevention. Regional collaboratives shall be self-sustaining at the end of the CMP project.

This letter constitutes your notice of approval to receive Federal civil money penalty (CMP) funds in the amount of \$495,732.64 for the express purpose of enhancing quality of care and quality of life of Tennessee nursing homes certified to participate in Title 18 and Title 19 of the Social Security Act. Please be advised that funding for Year Two is contingent upon CAC meeting all deliverables for Year One.

Based on review of the proposal, acceptance of CMP funds requires The University of Indianapolis, CAC to adhere to the project deliverables specified in the CMP application and addendum. CAC shall disclose the members of the Advisory Group to CMS and the State. CMS shall be provided with a list of all nursing homes participating in the CMP project, along with the name, address and telephone number of the Change Agent in each home overseeing the administration of the project. CAC shall make a concerted effort to work with one and two star rated nursing homes, and ensure that at least one member of each QAPI team is a Certified Nursing Assistant. To ensure transparency and communication, CAC shall provide the State Agency and CMS with a schedule of the monthly progress calls to be held with the lead organization of each Collaborative. The Tennessee Quality Improvement Organization (QIO), State Long Term Care Ombudsman, surveyors, resident and family council members shall be given an opportunity to participate in regional collaborative meetings.

The University of Indianapolis, Center for Aging and Community (CAC) shall submit a quarterly report on the status of this project and all metrics. The quarterly report shall focus on the impact of the regional collaboratives on improving healthcare outcomes for TN nursing homes, the group process improvement projects (PIPs), and disclose the challenges and lessons learned from participating stakeholders.

The University of Indianapolis, CAC shall also provide to CMS:

- A map of the regional collaboratives;
- A detailed list of nursing homes in each region;
- A copy of all handouts, resources and toolkits;
- A copy of sub-contracts upon request;

Quarterly reports on this project and a final report summarizing lessons learned and be will be sent to CMS, with the CMP request number 2018-04-TN-0709 included on all pages of the report. Please address correspondence for CMS to:

Stephanie M. Davis, MS., RD  
Chief, LTC Certification & Enforcement Branch  
Centers for Medicare & Medicaid Services  
Sam Nunn Atlanta Federal Center  
61 Forsyth St., Suite 4T20  
Atlanta, Georgia 30303-8909

The University of Indianapolis shall provide CMS a copy of the contract executed with the State of Tennessee. Moreover, any press releases or media developed by University of Indianapolis, Center for Aging & Community associated with the CMP project shall be approved by the CMS press officer in advance of publication or distribution.

State use of civil money penalty fund requests are not subject to an appeal. We look forward to receiving information on this QAPI project. Should you require further details or additional information regarding this CMP fund request please contact, Stephanie M. Davis at [Stephanie.Davis@cms.hhs.gov](mailto:Stephanie.Davis@cms.hhs.gov) or (404) 562-7471.

Sincerely,

*Stephanie M. Davis, for*

Linda D. Smith  
Associate Regional Administrator  
Division of Survey & Certification

cc: Stephanie M. Davis  
Louise Ryan  
Sally Pitt  
Chelsea Ridley  
Vincent Davis  
CMPRP Team