



# **Civil Monetary Penalty Reinvestment Fund: 2019 Strategic Allocation Plan**



## BACKGROUND

Tennessee Department of Health, Office of Health Care Facilities conducts complaint and scheduled surveys on behalf of Centers for Medicare and Medicaid Services (CMS) in long-term care facilities to ensure CMS rules and regulations are being followed. A civil money penalty (CMP) is a monetary penalty CMS may impose against skilled nursing facilities (SNFs), nursing facilities (NFs), and dually-certified SNF/NF for either the number of days or for each instance a facility is not in substantial compliance with one or more Medicare and Medicaid participation requirements for Long Term Care Facilities. CMP Reinvestment funds are administered by CMS to states for the implementation of support activities that benefit nursing home facility residents by improving their quality of care or quality of life.<sup>1</sup> Since 2012, a small number of nursing home facilities have implemented projects across the state to improve the quality of life of residents. However, activity targeting key clinical quality measures and addressing facilities not in compliance with CMS regulations has been limited. Improved clinical outcomes result in improved quality of life for residents. There are a number of national and state efforts aimed at quality improvement in long term care services including: the National Nursing Home Quality Care Collaborative Initiative (NNHQCCI) led by CMS, Medicare Quality Improvement Organizations (QIO), CMS Five-Star Quality Rating System, and the TennCare Quality Improvement in Long Term Services and Supports' (QuILTSS) initiative. The quality measures used to determine CMS Composite Scores, the national and state goals set forth by CMS, the sources to develop facilities' star ratings, and TennCare's QuILTSS initiative are outlined in **Figure A.**<sup>2-5</sup>

COMPOSITE SCORE MEASURES	TENNCARE QuILTSS MEASURES	QIO QUALITY MEASURES	FIVE-STAR RATING MEASURES
<ul style="list-style-type: none"> <li>Falls with major injury</li> <li>UTI</li> <li>Moderate to Severe Pain</li> <li>Pressure Ulcer</li> <li>Loss of Bowels or Bladder</li> <li>Catheter Left in Bladder</li> <li>Physically Restrained</li> <li>Need for help increased</li> <li>Lost too much weight</li> <li>Depressive Symptoms</li> <li>Antipsychotic Medications</li> <li>Flu Vaccine</li> <li>Pneumococcal Vaccine</li> </ul>	<ul style="list-style-type: none"> <li>Satisfaction (resident, family, staff)</li> <li>Culture Change/Quality of Life</li> <li>Staffing/Staff Competency</li> <li>Clinical Performance               <ul style="list-style-type: none"> <li>Antipsychotic Medication</li> <li>Urinary Tract Infection</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Antipsychotic Reduction</li> <li>Incontinence</li> <li>Activities of Daily Living Decline</li> <li>Healthcare Acquired Infections</li> </ul>	<ul style="list-style-type: none"> <li>Health Inspections               <ul style="list-style-type: none"> <li>Three years of onsite inspections (complaint and standard surveys)</li> </ul> </li> <li>Staffing rating</li> <li>Quality Measures               <ul style="list-style-type: none"> <li>Eleven physical and clinical measures for nursing home residents</li> </ul> </li> </ul>

**Figure A: State and Federal Quality Measures and Standards**<sup>2-5</sup>

In 2015, the Tennessee Department of Health (TDH) convened a Rising Stars Team to focus on the CMP Reinvestment Program. The Rising Stars Team, an ad-hoc action committee focused on rapid cycle improvement, was charged with identifying ways to align local, state, and federal priorities, encourage partnerships, and improve distribution of CMP funds to nursing home facilities. The team identified five (5) strategies to increase the utilization of the fund:

- **Strategy One:** Create a Strategic Plan and Process that aligns TDH CMP Reinvestment Program with five targeted areas of focus for funded projects
- **Strategy Two:** Engage stakeholders and establish greater public awareness of available funding
- **Strategy Three:** Provide and promote leadership for Culture Change and CMPQI oversight
- **Strategy Four:** Implement a redesign of CMP Reinvestment Program application processes and procedures to effectively administer funds
- **Strategy Five:** Engage local health departments and nursing homes through primary prevention initiative projects (PPI) to improve health outcomes of nursing home populations in their local communities

The 2015 recommendations that resulted from the Rising Stars team's research have driven Tennessee CMP Reinvestment program activities within TDH. The Tennessee CMP Reinvestment Program resides in the Office of Patient Care Advocacy (OPCA), an extension of the Commissioner's Office, and works in partnership with the Office of Health Care Facilities (OHCF). Two positions were authorized by CMS Region IV to ensure efficient utilization of Tennessee CMP Reinvestment funds, partnership building between stakeholders in Tennessee, raising public awareness of culture change and CMP Reinvestment opportunities, and using data to set funding priorities. Salaries and administrative costs utilize less than 3% of funds designated for administrative purposes, per CMS guidance.

This plan describes how Tennessee will use CMP Reinvestment Funds for the 2019 calendar year. Questions about this plan shall be directed to the points of contact listed below.

## TIMELINE

Plan Start Date: January 1, 2019

Plan End Date: December 31, 2019

Date of Submission to CMS: October 31, 2019

## STATE POINTS OF CONTACT

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## 2018: AT A GLANCE

Using the aforementioned funds for administrative purposes and developing a promotion and execution strategy has allowed Tennessee to more effectively and efficiently administer funds to applicants. When the programmatic functions moved to the OPCA in November 2017, newly appointed staff focused on completing outstanding contracts and developing plans for 2018 to further support nursing homes in improving quality of care and quality of life of residents. Programmatic efforts were focused on three program areas outlined in the Tennessee CMP Reinvestment Strategic Map:

1. Building relationships
2. Sharing best practices
3. Utilizing data to target efforts

To build relationships and trust among stakeholders, a Tennessee CMP Reinvestment Advisory Committee consisting of long-term care stakeholders across the state was convened. The advisory committee's responsibilities are as follows:

- Serve as a link between the Tennessee CMP Reinvestment Program and stakeholders in the nursing home community
- Share information related to the activities occurring in committee members' respective organizations relevant to the Tennessee CMP Reinvestment Program's or other committee members' use that may foster joint activities
- Provide feedback on the yearly Tennessee CMP Reinvestment Strategic Plan, targeted CMP Reinvestment Program areas, and ways the Tennessee CMP Reinvestment program can better meet the needs of nursing homes and their residents in Tennessee

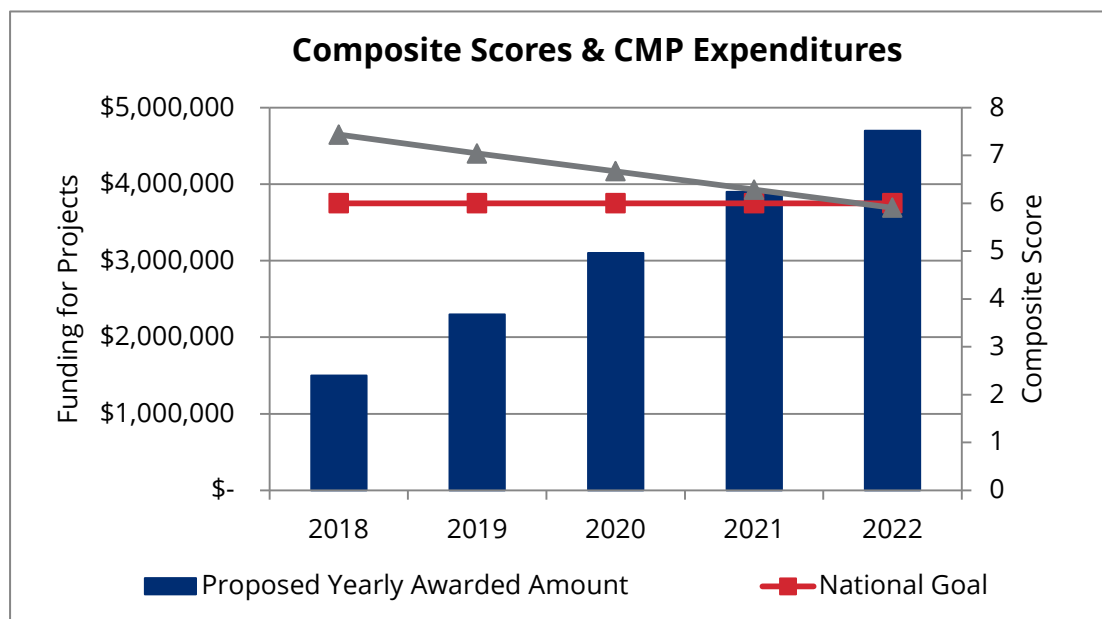
Tennessee CMP Reinvestment program staff members have met with various stakeholder organizations across the state and nation to increase awareness of funding opportunities, discuss potential projects and needs observed in the long-term care community. These partnerships have allowed the Tennessee CMP Reinvestment program to host quarterly Special Topic webinars as an educational platform to discuss emerging issues in nursing home facilities such as: residents' rights issues, clinical best practices, and quality improvement practices.

To share best practices in Tennessee and nationally, the Tennessee CMP Reinvestment program developed several methods of wide-reaching communication. Tennessee and Oklahoma developed a CMP National Network quarterly webinar that allows states and organizations to share best

practices related to CMP funded projects, administrative oversight of CMP programs, and improving care in long-term care settings. Topics have included: CMP funded projects, emerging issues in long-term care, and administrative practices related to CMP funding in each state. Along with the national network webinars, the Tennessee CMP Reinvestment program developed a newsletter released bi-monthly that provides CMP project updates and emerging areas of interest in the long-term care setting. Communication efforts have resulted in the State of Tennessee receiving 29 applications within the first three RFA cycles in 2018.

## NURSING HOME FACILITIES IN TENNESSEE

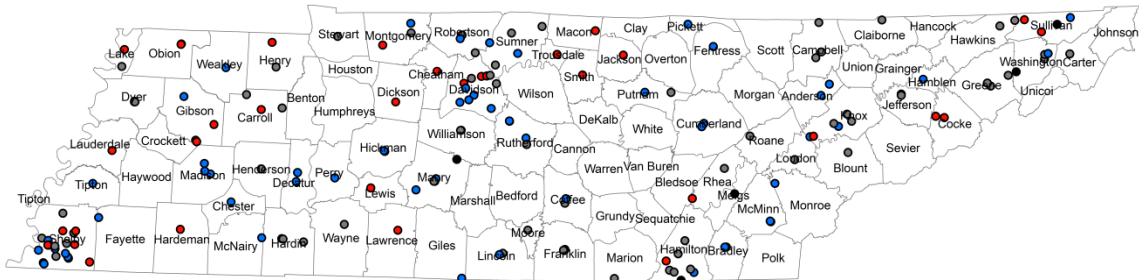
The CMS National Nursing Home Quality Care Collaborative (NNHQCC) developed a quality measure known as the [Composite Score](#) which is composed of 13 clinical measures. The composite score measures quality on a systems perspective (national composite score benchmark is six (6) and under).<sup>6-7</sup> As of July 2018, Tennessee's overall composite score was 7.73, but has consistently decreased each quarter. Prior to the first NNHQCC launching in 2013, nearly 10% of the nation's nursing homes have achieved a composite score of 6, allowing a benchmark to be established. **Figure B** demonstrates proposed funding for 2018 through 2022 with Tennessee and National composite score goals.



**Figure B: Proposed funding awards and composite score goals.**

CMS established a Five-Star Quality Rating Systems to assist nursing home residents, potential residents and caretakers in asking necessary questions, making informed decisions related to care and in the selecting a nursing home facility.<sup>4</sup> As of October 1, 2018, there were 40 one-star facilities, 55 two-star facilities, and 65 three-star facilities. In Tennessee, many of the one-to-three star facilities reside in counties where there may be few long-term care options.

**Figure C** depicts the location of one-star, two-star, and three-star facilities within the state. Clusters of one-star and two-star facilities occur throughout the state, allowing the opportunity for targeted regional and community level efforts.



**Figure C: One-star (Red), two-star (Blue), three-star (gray), and facilities without ratings are black (updated 10/1/2018 on CMS Nursing Home Compare)**

Tennessee will follow a Quality Assurance Performance Improvement (QAPI) approach utilizing multiple clinical measures to target funding priorities. The plan will focus on CMS funding priority areas:

1. Healthcare-Associated Infections
2. Emergency Preparedness
3. Preventable Hospitalizations
4. [Improving nursing home facilities' CMS star rating](#)
  - a. Health Inspections
  - b. Staffing
  - c. Quality Measures
5. Residents' Rights
  - a. Elder Abuse, Neglect, and Exploitation
  - b. Dementia/Alzheimer's Disease

Funding focus areas were selected utilizing CMS priorities which impact quality of care and quality of life of nursing home facility residents. Healthcare-associated infection (HAI) measures show how often patients in a particular facility contract infections during the course of their medical treatment. According to CMS, when following guidelines for safe care, these infections can often be prevented. The elderly and disabled are the most vulnerable during any disaster situation, and CMP Reinvestment funds will be targeted to aid nursing homes in the development of comprehensive and effective emergency management plans and/or practices that go beyond outlined regulations. By increasing the adoption of emergency preparedness practices, residents will have improved safety before, during and after emergencies and catastrophic disasters. The CMS Nursing Home 5-Star Rating systems were established by CMS to provide consumers with tools for a broader transparent comparison of quality of care between healthcare facilities. By utilizing CMP Reinvestment funds to implement initiatives to improve quality measures (falls, preventable

hospitalizations, etc.), resident care and quality of life would also improve. Due to the growing number of individuals aged 65 and older diagnosed with dementia/Alzheimer's, the number of tags associated with elder abuse and neglect, and feedback from the CMP Reinvestment Advisory committee, the Tennessee CMP Reinvestment Program decided to include residents' rights as one of the focus areas in 2019.

Using the aforementioned quality metrics as a guide in setting funding priorities will incentivize nursing home facilities to improve their quality of care and quality of life of nursing home residents. Forming partnerships with various stakeholders, writing proposals for quality improvement programs, and/or participating in established programs will improve the payer agencies' quality measures. This approach to funding is an incremental step in achieving a more robust, targeted, wide-reaching, and sustainable program.

## FUNDING ALLOCATION

As of June 30, 2018 \$30,593,080.69 dollars rest in the CMP Reinvestment reserve account with an approximate projected amount of \$31,000,000.00 by January 1, 2019. The state of Tennessee establishes a budget by fiscal year (FY) running from June 30 of an established year to July 30 of the next year. For the planned FY19 (June 2018-July 2019), the state will reserve a portion of CMP funds, \$5,000,000.00, for emergency situations such as relocation of residents during a closure. Tennessee estimates that approximately \$185,800.000 will be used in FY19 for the following purposes:

- Administration and monitoring of approved CMP projects in Tennessee including regular site visits (once a year, at minimum);
- Application development assistance for interested stakeholders;
- Convening of regional and statewide partnerships to address aging issues and meet the needs of nursing home facilities;
- Sharing of best practices among stakeholders; and
- Monitoring of data sources to assess needs in the long-term care community.

A breakdown of expenses is listed below:

Budget Description	Budgeted Amount (FY19)
Salaries & Benefits Two Full-Time Staff (FTE 2.0)	\$162,000.00
Travel	\$12,600.00
Printing	\$2,400.00
Communications	\$200.00
Supplies	\$1,200.00
Training	\$1,000.00
Computer Related	\$2,400.00
Professional Services Other	\$4,000.00
Total	\$185,800.00



Approximately \$933,671.68 has been budgeted for the nine Tennessee CMP Reinvestment projects beginning/continuing in FY19 and \$38,325.79 is budgeted for these projects in FY20 from July 1, 2019-June 30, 2020. Additional projects may be approved within the year at which point funds will be allocated accordingly by FY, not exceeding the state budget of \$5,000,000.00, and will be posted on the [Tennessee CMP Reinvestment website](#). Each year, the Tennessee Department of Health is required to submit a proposed budget for approval by the state legislature. It was determined, based on past Tennessee CMP expenditures; the budget need not exceed \$5,000,000.00 until the program is able to increase the dollar amount funded each fiscal year. Once CMP expenditures increase, the Tennessee Department of Health will increase budgeted amount submitted to the state legislature.

Currently funded CMP Reinvestment projects are listed below. For each project, obligated funding amounts are shown for FY19 and FY20. Estimated calendar year (CY) 2019 obligated amounts were calculated for each project by halving FY19 and FY20 obligated amounts and are noted below. It is important to note that all currently funded projects (excluding Florida Atlantic University and Tennessee Eden Alternative Coalition) are advanced payment and expenditures are monitored each quarter.

Project Title	Amount Obligated: FY 2019	Amount Obligated: FY 2020	*Estimated Amount: CY 2019	Start Date- End Date	Recipient of Funds
Reframing Dementia through Person-Directed Practices	\$130,847.00	\$0.00	\$65,423.50	July 1, 2016- June 30, 2019	TN Edenizing Foundation dba Tennessee Eden Alternative Coalition
Palliative Care Transitional Program	\$48,956.00	\$0.00	\$24,478.00	February 1, 2018- January 31, 2019	Saint Thomas Health Foundation
Activities, Restorative, and Therapy in Sync (ARTS)	\$3,487.50	\$1,743.75	\$2,615.63	April 1, 2018- March 21, 2021	Tennessee Health Management, Inc.- Memphis
Music and Memory program	\$165,950.97	\$0.00	\$82,975.49	July 1, 2018- June 30, 2019	Tennessee Technological University
Eden Alternative Associate Training	\$15,500.00	\$0.00	\$7,750.00	March 1, 2018- February 28, 2019	Signature Healthcare: Mountain City Care and Rehabilitation



Dissemination of Resident and Family Decision Guide, Go to the Hospital or Stay Here?	\$36,121.42	\$9,027.04	\$22,574.23	June 1, 2017-September 30, 2019	Florida Atlantic University
Activities, Restorative, and Therapy in Sync (ARTS)	\$416,105.29	\$27,555.00	\$221,830.15	July 1, 2018-June 30, 2021	Tennessee Health Management, Inc.- Jackson
Certified Eden Alternative Training	\$28,020.00	\$1,000.00	\$14,510.00	October 1, 2018-September 30, 2019	Uplands Retirement Village dba Wharton Nursing Home
WashSense Pilot Project	\$89,381.00	\$0.00	\$44,690.50	July 1, 2018-June 30, 2019	Memphis Operator, LLC dba Spring Gate Rehabilitation Center
Total obligated funds in FY19 for approved projects as of September 24, 2018:	\$934,369.18	*Some funds have already been expended due to advanced payment structure			
Estimated obligated funds in CY19:	\$486,847.49	*Calculated by halving funds allocated for FY19 & halving funds allocated for FY20			
Total emergency CMP funds held in reserve for CY19:	\$5,000,000.00	*Based on estimates from FY19 & FY20			
Projected administrative use for FY19:	\$185,800.00				

Total amount of funding in Tennessee's state CY19 budget for continuing and/or new projects:	\$5,000,000.00	*Based on estimates from FY19 & FY20			
Total Estimated Fund as of January 1, 2019:	Approximately \$31,000,000.00				
Available Funds for CMP projects in CY19:	\$25,327,352.51	*Only up to \$5,000,000.00 may be used due to legislative approved budget			

## STRATEGIC APPROACH

The Tennessee CMP Reinvestment Program has developed a Strategic Planning process outlined in **Figure D**. In 2018, the Tennessee CMP Reinvestment Program Advisory Committee met to discuss progress related to disbursement of funding and ways to further support the needs of the long-term care community through funding and program activities. Using data found on Nursing Home Compare and [QCOR](#) partnered with feedback received from the advisory committee, the following program goals have been developed. These goals, along with the action steps outlined in the Strategic Map, will be measured on a quarterly basis, at minimum, to ensure targets are being met.

### Short Term Program Goals:

- **Program Goal One:** By the end of calendar year 2019, the Tennessee CMP Reinvestment Program will provide a collection of resources related to each focus area on the CMP Reinvestment website for stakeholder use
- **Program Goal Two:** By the end of calendar year 2019, the Tennessee CMP Reinvestment program, in partnership with the Office of Health Care Facilities, will apply for CMP funds to address one of the following topics: residents' rights, customer service, and/or emergency preparedness capacity



**Figure D: Strategic Planning Process**

- **Program Goal Three:** By end of calendar year 2019, the Tennessee CMP Reinvestment Program will develop and administer a statewide survey for staff in long-term care to assess their training and development needs
- **Program Goal Four:** By the end of calendar year 2019, the Tennessee CMP Reinvestment Program will work with stakeholders around the state to develop mentor groups in each public health region willing to serve as mentors and experts in various topics related to long-term care to assist nursing facilities in developing funding proposals

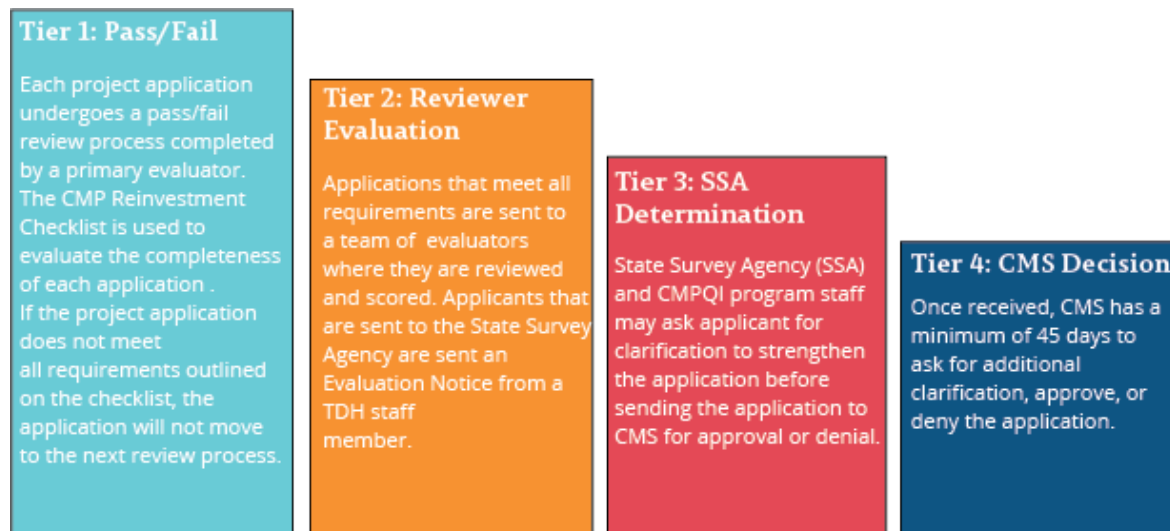
#### **Long Term Program Goals:**

- **Program Goal One:** Increase the number and quality of proposals with high likelihood of CMS approval by the year 2021 as measured by the number of proposals received, percent sent to CMS, and percent approved by CMS
- **Program Goal Two:** By 2023, decrease the Tennessee's state composite score to meet the CMS national benchmark of 6
- **Program Goal Three:** Increase the annual amount of funding awarded to qualified applicants to \$5 million by 2023

#### **APPLICATION & REPORTING PROCESS**

The Tennessee Department of Health accepts applications quarterly, at minimum, through a Request for Application (RFA) process. All RFA announcements are posted on the TDH Funding Opportunities Website (<https://www.tn.gov/health/funding-opportunities.html>). Posting announcements are sent to stakeholders informing them of the open RFA and inviting them to participate in a pre-proposal teleconference. The pre-proposal teleconference reviews the application requirements outlined in the RFA and encourages potential awardees to submit questions in writing to the TDH Competitive Coordinator. Questions will be gathered and answered in a Frequently Asked Questions (FAQ) document from CMP Reinvestment Program staff and posted on the Tennessee CMP Reinvestment website.

Once applications are received, they are reviewed using a four-tiered approach to ensure appropriate use of funding and benefit to residents, families, and/or caretakers.



**Figure E: Tiered Review Process**

- **Tier One:** Pass/Fail - Completed by three representatives of the Tennessee Department of Health. Decisions will be made based on the completeness of the application. Applications which meet all requirements will then be sent to the evaluation committee for review.
- **Tier Two:** Application Scoring - Application scoring will be completed by a review committee comprised of a minimum of three or more unbiased representatives of the Tennessee Department of Health and/or other state agencies. Reviewers will be given ten (10) business days for review. Reviewers will utilize the following scoring criteria for the assessment of applications. Applications that score a minimum of 85 out of 100 points will be reviewed by the Tennessee CMP Reinvestment staff and State Survey Agency Director:

- **EXPECTED OUTCOMES (35 Points):**

*Project Abstract:* Provide an abstract summary of the project. Include the requester's background and qualifications, the need for the project, a brief description of the project and its goals and objectives. Of the utmost importance is information regarding what measures the project will be evaluating to measure success. The person(s) who will be accountable for the project evaluation should be specified.

*Statement of Need:* Describe the problem that the project will attempt to address. Also, describe any problems that may be encountered in the implementation of this project. Articulate the contingency plan to address these issues. Identify how the need aligns with strategic priorities (applicants as well as federal, state and other agencies).

- Program Description:* Describe the project or program and provide information on how it will be implemented. Include what will be accomplished and the desired outcomes. A timeline shall accompany all proposals which outline benchmarks, deliverables and dates. Supplemental materials such as brochures, efficacy studies and peer reviewed literature may be attached.
- RESULTS MEASUREMENT (25 Points):

*Performance Measurement and Program Evaluation:* Describe the methods by which the results of the project will be assessed (including specific measures). Multi-year projects shall provide a provision for submission of interim progress reports and updates from the project leader to CMS. Staff attending training shall articulate how knowledge learned will be shared among other long-term care employees and ultimately how the information will improve resident outcomes.
  - BENEFITS TO NURSING HOME (NH) RESIDENTS (10 Points):

*Improving Quality of Life and Care:* In detail, describe the manner in which the project will directly benefit and enhance the well-being of nursing home residents.
  - CONSUMER/STAKEHOLDER INVOLVEMENT (5 Points):

*Nursing Home Community:* Briefly describe how the nursing home community (including resident and/or family councils and direct care staff) will be involved in the development and implementation of the project. Describe how the governing body of the nursing home or organization will lend support to the project.
  - FUNDING (5 Points):

*Financial Feasibility and Sustainability:* Include the completed Excel Budget spreadsheet (see Attachment 2) and the Budget Details Page for the project, along with a narrative explanation of the costs. Mention any co-funding that you are planning to use from other sources. The narrative shall include the specific amount of CMP Reinvestment funds to be used for the project, the time period for such use, and an estimate of any non-CMP Reinvestment funds that the State or other entity expects to be contributed to the project. Sustainability should describe how the organization will cover the basic operating expenses (staff, supplies) after award funding is expended.
  - INVOLVED ORGANIZATIONS (10 Points):

*Organizations and partnerships:* List a contact name, address, Internet e-mail address, and telephone number of all organizations that will receive funds through this project. List any sub-contractors and organizations that are expected to carry out and be responsible

for components of the project. Copies of contracts and subcontracts shall be available upon request to CMS and the State.

- INNOVATION AND REPLICABILITY (5 Points):

*Sharing best practices:* The proposal should use evidence-based practices (researched and proven to be effective) adapted to fit organizational needs. Identify how the organization will share and disseminate results of their project to other nursing homes, state and federal agencies, etc.

- FOCUS AREA (5 Points):

*Proposal relevance:* The proposal should align with one of the identified CMP Reinvestment program focus areas that are outlined in the RFA document within the “Request for Applications” section. The proposal will receive five (5) points if the proposal demonstrates relevance and outcomes related to the focus areas.

- **Tier Three:** State Survey Agency (SSA) Determination - Within eighteen (18) days the applications must be reviewed by the Office of Patient Care Advocacy and Office of Health Care Facilities. During this time period, the Office of Patient Care Advocacy and Office of Health Care Facilities may seek additional information to strengthen the application or provide clarification before deciding whether to submit to CMS. If the offices approve the application, then it must be submitted to CMS for review and final approval or denial.
- **Tier Four:** CMS Decision CMS has at least forty-five (45) days for review. CMS may also seek additional information to approve or deny the application. If CMS denies an application, the applicant will be notified by CMS and there is no appeal process. However, the applicant may reapply again during any subsequent issuance of request for CMP Reinvestment proposals. If the application is approved the applicant will be notified by CMS.

Once an application is approved by CMS, a contract is created by CMP Reinvestment Program and awardee reporting periods are outlined. Awardees are responsible for providing quarterly narrative reports along with related expense and budget reports, an annual expense and budget report each project calendar year, and two follow-up monitoring reports (submitted six months post-project scope). Tennessee CMP Reinvestment Program staff review the reports to ensure appropriate spending of funds and deliverables outlined in the initial application are being met. If an awardee is not meeting deliverables, benchmarks, or seeing positive outcomes, Tennessee CMP Reinvestment Program will provide technical assistance to the awardee to ensure project outcomes are met. If an approved entity fails to meet deliverables or benchmarks in any project year even with technical assistance the awardee may be required to refund any unexpended funds. **If an awardee fails to meet deliverables, benchmarks, or see positive outcomes in any multi-year project even with technical assistance, the funding will not be renewed for the following year and**

**the awardee will be required to refund any unexpended CMP Reinvestment funds.** Tennessee CMP Reinvestment Staff will also be conducting site visits once a year, at minimum, at participating nursing home facilities to speak with residents, families, and/or staff members to ensure the project is meeting expectations. In 2019, the CMP Reinvestment staff plan to move to a standardized online reporting format to make reporting more streamlined for project leads and to help ensure all needed information is obtained.

## INTERNAL APPLICATION PROCESS

When TDH is the fund-issuing entity, any internal office/division within the Department of Health seeking funding under the Tennessee CMP Reinvestment RFA process must seek to do so in collaboration with the OHCF and OPCA. The CMS application will be completed as an internal collaboration between the applying area of TDH, OHCF, and OPCA. OHCF and OPCA will act as an overseeing collaborator for the project. TDH internal applicants are required to provide a proposal abstract, no longer than two (2) pages, including the following:

- 1) The proposed project to improve the quality of care or quality of life of nursing home residents in the State and identify the nursing home partners it seeks to assist, and as applicable, how those partnerships will be established;
- 2) The timeframe of the project and anticipated cost breakdown(s) to implement the project; and
- 3) The tracking methodology, including identifying the data and timeframes for reporting, that will be utilized to track such improvements.

The application coordinator from each internal applying TDH office/division, following submission of its abstract, will then contact the State Survey Director and the Tennessee CMP Reinvestment Program Director to set up a meeting to review the proposal. Meetings will be conducted shortly following that contact whereby the potential applicant agency is encouraged to ask questions concerning the process. Following that meeting, OHCF will make a determination within five (5) business days as to the likely viability of the proposed project and its potential ability to improve the quality of care or quality of life of nursing home residents in the State, and the Office's ability and willingness to collaborate with the agency. If agreed, OHCF will notify the internal applying agency to prepare and submit the CMS application through the TDH Funding Opportunities website. Internal TDH applications are then subject to the Four Tiered review and approval process referenced above.

## CONCLUSION

The Tennessee CMP Reinvestment Program is dedicated to funding projects in nursing home facilities to improve quality of care and quality of life of nursing home residents. In 2019, funding focus areas will target clinical measures, residents' rights issues, and will address the needs of





nursing home community members in our state. Funding will be awarded through an internal competitive process and ultimately approved by CMS Region IV and projects will be monitored by the Tennessee CMP Reinvestment program.

The Tennessee CMP Reinvestment program will continue efforts focused on building relationships, sharing best practices, utilizing data to target efforts and advocating for elders in Tennessee. The short-term program goals will help guide programmatic activities to reach overall long-term goals as outlined. Focusing on the needs of long-term care stakeholders by utilizing data and aligning initiatives and regulations will allow CMP funded projects to make a long-lasting change in the nursing home community.

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