



IMPORTANT NOTICE – PLEASE READ CAREFULLY
(Receipt of this Notice is presumed to be June 29, 2017 -Date Notice E-mailed)

June 29, 2017

Ms. Mary Price
Saint Thomas Health Foundation
4220 Harding Road
Nashville, Tennessee 37205
mprice@sth.org
mprice@ascension.org

Re: Request for State Use of CMP Funds
CMP Request No. 2017-04-TN-0607
CMP Fund Request Approved \$101,212.00

Dear Ms. Mary Price:

The CMS Atlanta Regional Office has reviewed your civil money penalty (CMP) request seeking \$101,212.00 to implement a Palliative Care Transition Program in four Tennessee nursing homes. This is a one-year project focused on increasing the number of resident care conversations on advanced directives and palliative care across the continuum of care. The Physician Ordered Life Sustaining Treatment (POLST) form will be utilized to record residents' treatment wishes. The participating nursing homes are:

| Facility | CMS Certification number | Number of Beds |
|-------------------------------------|---------------------------------|-----------------------|
| The Health Center at Richland Place | 44-5166 | 107 Beds |
| NHC Place Cool Springs | 44-5475 | 180 Beds |
| NHC Place on the Trace | 44-5525 | 90 Beds |
| NHC Healthcare Murfreesboro | 44-5108 | 181 Beds |

Congratulations, CMS has approved the usage of CMP funds for the Palliative Care Transitional Program at four NHC nursing homes. Acceptance of CMP funds by Saint Thomas Health Foundation and National Healthcare Corporation requires the corporations to submit quarterly reports to CMS and provide CMS with a copy of the written contract with the state regarding this project and CMP funding.

Reporting on the CMP project is an important and integral aspect of receiving civil money penalty (CMP) funds from CMS. Reports should provide information on the specified deliverables and activities stated in the CMP application request; as well as, any new findings, pitfalls, successes, and updates on the budget. The quarterly reports will help CMS to understand the impact of the project on the lives of Medicare beneficiaries and to learn from your organization's experience.

The CMS regional office looks forward to receiving quarterly reports on the Palliative Care Transitional Program. Quarterly reports shall include a cover letter with the name of the project leader, along with their telephone number and e-mail address; the CMS Certification number of each participating facility, and the CMP request number 2017-04-TN-0607 on all pages of the report and narrative.

Submit quarterly reports to:

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

Saint Thomas Health Foundation shall submit an annual report that discussing best practices in resident care resulting from the implementation of the "Palliative Care Transitional Care Program." The inclusion of any success stories would be appreciated.

State use of civil money penalty fund requests are not subject to an appeal. This CMP request was made possible by the Centers for Medicare and Medicaid Services (CMS) in partnership with the Tennessee State Survey Agency. If you have any questions regarding this matter, please contact Stephanie M. Davis, Chief, LTC Enforcement Branch at (404) 562-7471.

Sincerely,


for: Sandra M. Pace
Associate Consortium Administrator
Division of Survey & Certification

cc: Stephanie M. Davis, MS., RD
Carol Mace
Louise Ryan