

Michigan Department of Health & Human Services

# **Civil Money Penalty Reinvestment Program Overview**

# Civil Money Penalty Funds

- A CMP is a monetary penalty the Centers for Medicare & Medicaid Services (CMS) may impose against nursing homes for either the number of days or for each instance a nursing home is not in substantial compliance with one or more Medicare and Medicaid participation requirements for long-term care facilities.
- A portion of CMPs collected from nursing homes are returned to the states in which CMPs are imposed. State CMP funds may be reinvested to support activities that benefit nursing home residents and that protect or improve their quality of care or quality of life.

# Civil Money Penalty Funds

- As part of its continued commitment to the nation's most vulnerable populations, the Centers for Medicare & Medicaid Services (CMS) has launched the Civil Money Penalty Reinvestment Program (CMPRP) to improve quality of life by equipping nursing home staff, administrators and stakeholders with technical tools and assistance to enhance resident care. CMPRP is one of several initiatives CMS has underway to strengthen safety and health outcomes for nursing home residents.

# Eligibility Requirements

- Funds may be granted to any entity for proper use of Centers for Medicare & Medicaid Services (CMS) approved CMP projects to protect or improve the quality of life or quality of care for long-term care (LTC) facility residents – provided the responsible receiving entity is:
  - Qualified and capable of carrying out the intended project or use;
  - Not in any conflict-of-interest relationship with the entity or entities that will benefit from the intended project or use;
  - Not paid by a State or Federal source to perform the same function as the CMP project or use. CMP funds may not be used to enlarge or enhance an existing appropriation or statutory purpose

# Eligible Applicant Examples

- Consumer Advocacy Organizations
- Resident or family councils
- Professional or State Nursing Home Associations
- CMS-Certified LTC Facilities (Skilled Nursing Facility (SNF), Nursing Facility (NF))
- Vendors
- State Agencies
- Academic Institutions

# Funding Objectives



CMP funds may be used for (but not limited to) projects that improve the quality of life for residents through innovative approaches to implement person directed values within the nursing facility. For projects to meet this priority, they must include specific outcomes such as improving activities, programs, processes, or systems to enhance daily life for nursing facility residents or promoting increased nursing facility resident autonomy.

# Funding Objectives (CMS)

- Support resident and family councils and other consumer involvement in assuring quality care in facilities.
- Direct improvements to quality of care: Funds may be used for projects designed to directly improve care processes for nursing facility residents of multiple nursing facilities.
- Training: Funds may be used for training of facility staff, technical assistance for facilities implementing quality assurance programs, training for resident or family councils, and other activities that benefit nursing facility residents.
- This is not a full, detailed list. For more information visit our website

# Funding Objectives (MDHHS)



- Deepen relationships between residents, staff, and volunteers of nursing facilities.
- Utilize new, innovative or pioneering programs or methods designed to improve life for nursing facility residents.
- Surprise and delight nursing facility residents.
- Improve activities, programs, processes or systems to enhance daily life for nursing facility residents.
- Protect or improve the quality of life and care for nursing facility residents.
- Culture change, implementing emerging or nationally sanctioned person-centered culture change models.

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# Project Guidelines

- Projects *CANNOT*:
- Exceed three years
- Include items or services not related to improving the quality of life and care of nursing home residents or protecting such residents
- Include research as a focus as the benefit to nursing home residents is unknown or concentrated on the research entity, or a large portion of the budget does not directly benefit nursing home residents
- Include funding for capital improvements

# Project Guidelines (cont.)

- Projects *CANNOT*:
- Include funding for survey and certification operations or state expenses
- Include funding for refreshments
- Include funding for incentives (example: gift cards for attending training)
- Include excessive indirect costs
- Include funding for nursing home services or supplies that are already the responsibility of the nursing home (staff, required training, required equipment)

# Project Guidelines (cont.)

- Projects *CANNOT*:
- Include unclear or excessive expenses (budget items that are not clearly detailed or itemized, unreasonably high project staff salaries or travel expenses, excessive staff to implement a project)
- Include supplementary or duplicative federal or state funding (personnel performing the same duties as Ombudsman)
- Resubmitted after CMS disapproval/denial
- This is not a full, detailed list. For more information visit our website

# Past Project Examples

Project Title	Brief Summary
Grand Traverse Pavilions: Outdoor Recreation Biking Activity Program	This program involved designated blocks of time for an employee or volunteer to take out multiple residents in a given time frame. This allows a wide variety of users to participate, including those with significant physical or cognitive limitations.



# Past Project Examples

Project Title	Brief Summary
Florida Atlantic University: Education Materials Aim to Reduce Avoidable Hospital Visits	Of the 1.4 million nursing home residents throughout the U.S., more than one-fourth are hospitalized each year — a rate that continues to rise, according to the Office of the Assistant Secretary for Planning and Evaluation. Many of those hospitalizations occur because of family or resident insistence on hospital care and are potentially avoidable. These statistics are the reason Dr. Ruth Tappen, Professor of Nursing at Florida Atlantic University, and her team created materials in multiple languages to provide education about how and when it is better to receive care at the nursing home instead of the hospital.

# Application Sections

- Program Implementation
- Executive Summary
- Staffing and Training
- Budget/Budget Narrative
- Work Plan

Letters of Commitment

# Review Process

- State Level Review
  - Review panel made up of State Employees
  - Applicants will receive a State Level determination
- CMS Level Review
  - CMS makes the final decision to approve or deny a CMP application

## Up to 16 weeks

- Applications requesting funds over \$500,000 must go through an additional review process that could extend this time frame

Determinations are sent to the email included in the application

# Post-Award Requirements

- MDHHS Asks Grantees to:
- Submit standard quarterly narrative workplan reports and monthly FSRs
  - Proof of purchase is required for all program-related activities
- Submit an annual report each year
- Submit a final report 30 days after the end of the grant period.
  - Must include a description of the measurable progress made toward goals and any impediments incurred in achieving identified goals
- Participate in an annual meeting to share outcomes, best practices, and lessons learned with other grantees and additional interested parties



# Important Dates



- Bi-Annual Cycle with program start dates in October and April of every year
- NFEP 24'

Project Start	Open for Application	Application Close Date	Application Workshop
10/01/23	3/15/23	4/26/23	02/24/23

# Program Contact Information



- Paris Lawson, Nursing Facility Enrichment Contract Coordinator
- Malia Robb, Nursing Facility Enrichment Coordinator
- Laurie Ehrhardt, Long Term Care Operations Section Manager
- [MDHHS-CMPGRANTS@michigan.gov](mailto:MDHHS-CMPGRANTS@michigan.gov)
  - This solicitation is competitive; therefore, staff cannot have individual conversations with prospective applicants. Any questions concerning the content of this RFP must be sent via email to [MDHHS-CMPGRANTS@michigan.gov](mailto:MDHHS-CMPGRANTS@michigan.gov) on or before March 28, 2023. Questions may be discussed verbally at the pre-application conference. MDHHS will compile all relevant questions and answers and post these as well as any other clarifications or revisions to the initial RFP by March 31, 2023 on the EGrAMs website.

## For more information,



- Centers for Medicare & Medicaid Services, Civil Money Penalty Reinvestment Program:
  - [Civil Money Penalty Reinvestment Program | CMS](#)
- MDHHS, Civil Monetary Penalty Grant Program:
  - [Civil Monetary Penalty \(CMP\) Grant Program \(michigan.gov\)](#)

**Thank you**