

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



IMPORTANT NOTICE – PLEASE READ CAREFULLY
(Receipt of this Notice is Presumed to be March 2, 2020 -Date Notice E-mailed)

March 2, 2020

Attn: Amanda Ryan, PharmD, BCGP
Qsource
3340 Players Club Parkway
Suite 300
Memphis, Tennessee 38125
aryan@qsource.org

Re: Request for State Use of CMP Funds
CMP Request No. 2019-04-TN-0108
CMP Fund Request Approved- \$599,910.62
Project Expansion for Years Two and Three

Dear Dr. Amanda Ryan:

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 Q-source for \$599,910.62 to implement a program titled *Training and Assistance to Individualize Pain Management and Improve Opioid Safety in Nursing Homes*. This project is being expanded to include 40 additional Tennessee certified nursing homes. This project will benefit and enhance the well-being of nursing home residents in myriad ways. Because opioids can contribute to adverse events such as falls, pressure ulcers and weight loss, individualizing pain management based on residents' specific indication and needs will improve their quality of life.

Based on the CMP application request and additional information provided for review, the CMP request has been approved. Acceptance of CMP funds Qsource requires the organization to:

- Review the CMP project and Year one deliverables with Alliant Quality, the Tennessee Quality Improvement Organization (QIO);
- Ensure that all participating nursing homes are registered with Alliant Quality;
- Qsource shall submit a quarterly report to CMS that discloses how the training on pain management and opioid safety has impacted quality of care and quality of care for residents in Tennessee certified nursing homes;
- Provide routine updates on the project to the Medical Director of each participating nursing home, to elicit their input and feedback on how to foster improvements throughout the project.
- Schedule a conference call with the State Survey Agency (SSA) and CMS on the progress of the project at least every six months;
- Submit an annual report at the end of each year summarizing the challenges, lessons learned and best practices;
- Funding for Year Two is contingent upon Qsource meeting the project deliverables specified for Year One.
- Funding for Year Three is contingent upon Qsource meeting the project deliverables specified in Year Two, and sustaining the project deliverables in the 20 nursing homes participating in Year One of the project.
- Provide CMS with a copy of the contract expanding the project to 40 additional TN nursing homes.

Quarterly reports on this project and a final report summarizing lessons learned and be will be sent to CMS, with the CMP request number 2019-04-TN-0108 included on all pages of the report. Please address correspondence for CMS to:

Stephanie M. Davis, MS., RD
Survey & Enforcement Division
Centers for Medicare & Medicaid Services
Center for Clinical Standards & Quality
Sam Nunn Atlanta Federal Center
61 Forsyth St., Suite 4T20
Atlanta, Georgia 30303-8909

This CMP request was made possible by the Centers for Medicare and Medicaid Services (CMS) in partnership with the Tennessee State Agency. In accordance with 42 CFR 488.433, states must make information about the results of projects funded by CMS available to the public. States must submit results of projects using the CMP Reinvestment Plan Project Tracker, due annually in February and posted on the CMS CMPRP website.

If you have any questions regarding this matter, please contact Stephanie Davis, Chief, LTC Enforcement Branch at (404) 562-7471.

Sincerely,

Stephanie M. Davis

for:

Linda D. Smith, Director
Atlanta Division of Survey & Enforcement
Center for Clinical Standards & Quality

cc: Stephanie M. Davis
Louise Ryan
Shaquallah Shanks
Sally Pitt
Kristyn Long
Vincent Davis
CMPRP Team