

Examples of Allowable Uses of Civil Money Penalty (CMP) Reinvestment Funds

Extension Projects

CMP funds may be used to extend successful CMP projects to new nursing home populations. Examples include a project that was approved within a set of NHs in a region and it is expanded to another set of nursing homes within the region, or a project implemented in one region and now it is expanded to another region in the state; a third example is a project approved in one state and now the applicant is seeking to expand it to another state. In the Application Resource Guide and Example Application Template, available on the CMPRP website, there are instructions on how to submit an extension project for a previously approved project. Additionally, the applicant must submit results of the previously approved and completed project (if applicable), with confirmation of results provided by the state agency.

Travel Costs

Travel costs are permitted when it is required to implement the project. Travel rates should be based on reasonable rates for airfare, mileage, hotel, and per diem. The applicant should provide a clear breakdown of all travel costs, including an estimate of rates, such as the number of travelers and travel days, cost per ticket, and travel locations. Use of the budget template (available on the CMPRP website as part of the Application Resource materials) will help applicants provide this information. Note that travel costs are not permitted when it is offered to participants of a training or conference.

Nursing Home Demand

Projects should meet an existing nursing home need. Letters of support or commitment from nursing homes, and evidence of participation in similar projects should be submitted by non-nursing home applicants. Letters should come directly from nursing homes that are interested in participating in the proposed project. CMS does not prescribe a specific number of letters of support. Letters or other evidence provided should be commensurate with the size of the proposed project. For example, if an applicant is proposing a project in one or two nursing homes, it is reasonable to expect documentation of demand from those facilities.

Project Evaluation

Use of CMP funds to evaluate the impact of a project is allowable, if the scope and costs are reasonable. Applicants should provide a description of how the project's performance will be monitored or evaluated. Examples of outcome metrics include the following:

- An applicant recruited 50 nursing homes to engage in training. Survey responses collected from all 50 nursing homes showed a 20% reduction in resident depression, irritability, and apathy as well as a 30% increase in enjoyment of activities and social interaction. A total of 49 testimonials detailing resident improvement in imagination/creativity, community contribution, talking, and laughing serve as strong qualitative indicators of success.
- At the end of the one-year period, an applicant organization had conducted 12 in-person trainings with 1,455 attendees. Nursing homes that sent at least one staff member to the training saw an improvement in influenza immunization rates by 15% and pneumococcal immunization rates by 10%.

Note that research is not an allowable use of CMP funds, such as using a large portion of the project budget for development and testing of an intervention or activity, rather than implementation of the project.

Emergency Use

States can use CMP funds for assistance to support and protect residents of a facility that closes (voluntarily or involuntarily) or is decertified (including offsetting costs of relocating residents to home and community-based settings or another facility). Funding cannot be used for meeting regulatory requirements (e.g., see 42 CFR §483.73 Emergency preparedness).

Administrative Use

CMP funds can be requested by the state for certain costs of administering the CMP program as part of the annual CMP State Plan process. For example, states may request funds for personnel required to solicit and review CMP Applications. The request should include adequate detail and justification for the requested amount including position descriptions and the breakdown of salary and benefits for each position (e.g., salary and benefits for one full-time staff to oversee the evaluation of approximately 60 submitted CMP Applications as well as the administration of approximately 20 CMP awards). A state can also submit a proposed amendment to the State Plan to the CMS Long-Term Care Branch to request new or additional administrative funds after the State Plan has been approved by CMS.