

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



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**IMPORTANT NOTICE – PLEASE READ CAREFULLY**  
(Receipt of this Notice is Presumed to be February 12, 2021 Date Notice E-mailed)

February 12, 2021

Ms. Cara Silletto  
Magnet Culture, LLC  
3008 Amelia Circle  
Jeffersonville, Indiana 47130  
[cara@magnetculture.com](mailto:cara@magnetculture.com)

**Re: Request for State Use of CMP Funds**  
**CMP Request No. 2020-04-TN-0113**  
**CMP Fund Request Approved- \$376,500**

Dear Ms. Cara Silletto:

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 Magnet Culture for \$376,500 to implement a program titled, “*The Continuity of Care Project.*” The primary goal of this project is to provide valuable, concise, flexible leadership training to up to 360 department heads and leaders in 30+ Tennessee skilled nursing facilities over a three-year period, and to provide continued mentorship to increase ongoing staffing stability. The program will concentrate on improving quality care to nursing home residents by teaching managers key topics for solving staff retention issues, including: employment market trends, future staffing projections, generational dynamics, management strategies to create a work environment that attracts higher quality candidates, more effective communication, and retention strategies proven to keep talent longer. It will also provide the community a virtual toolkit and online resources to support the training. This project is expected to directly benefit nursing community residents

by increasing staffing stability and reducing turnover of the front-line, direct care staff, which will result in more consistent staffing and improved continuity of care for residents. There are 30 nursing homes participating in this three-year project.

Based on our review, we find that the requirements at 42 CFR § 488.433 are met and that the proposal may be funded with federally imposed CMP funds.

In accordance in the 2021 Tennessee Reinvestment Plan and as specified in your proposal quarterly reports on this project and a final report summarizing lessons learned will be sent to Tennessee State Survey Agency, with CMP request number 2020-04-TN-0113 included on all pages of the report. The Tennessee State Survey Agency will be monitoring this three-year project and reviewing all reports. Reports shall be made available to CMS upon request. Please address correspondence to:

Shaquallah Shanks  
Tennessee Department of Health  
Office of Patient Advocacy  
Andrew Johnson Tower, 5<sup>th</sup> Floor  
710 James Robertson Parkway  
Nashville, TN 37243  
[Shaquallah.Shanks@tn.gov](mailto:Shaquallah.Shanks@tn.gov)

Every six months, the Project Leader shall schedule and coordinate a conference call with CMS and the Tennessee State Survey Agency to share updates on the status of the project.

This CMP request was made possible by the Centers for Medicare and Medicaid Services (CMS) in partnership with the Tennessee State Survey Agency.

In accordance with 42 CFR § 488.433, states must make information about the results of projects funded by CMPs available to the public. States must submit results of projects using the CMP Reinvestment State 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, Atlanta LTC Enforcement Branch Manager at (404) 562-7471 or [Stephanie.Davis@cms.hhs.gov](mailto:Stephanie.Davis@cms.hhs.gov)

Sincerely,

*Stephanie M. Davis for*

Linda D. Smith, Director  
Atlanta Survey & Enforcement Division  
Centers for Medicare & Medicaid Services

cc: Stephanie Davis  
Louise Ryan  
Shaquallah Shanks  
Vincent Davis  
Alliant Quality  
CMPRP Team