

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 May 25, 2021 Date Notice E-mailed)

May 25, 2021

Ms. Sarah Slocum  
Altarum Institute  
3520 Green Court, Suite 300  
Ann Arbor, Michigan 48105  
[Sarah.Slocum@altarum.org](mailto:Sarah.Slocum@altarum.org)

**Re: Request for State Use of CMP Funds**  
**CMP Request No. 2021-04-TN-0106**  
**CMP Fund Request Approved- \$1,480,889.96**

Dear Ms. Sarah Slocum:

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 Altarum for \$1,480,889.96 to implement a program titled, “*Accelerating Quality Improvement for Long-Stay Residents in Tennessee Nursing Homes Using Culture Change During COVID-19.*” The applicant proposes to implement and assess a comprehensive culture change process that centers on improving resident quality of life by training staff to rethink current practices and engage new protocols that enhance their responsiveness to residents’ needs and preferences. The project will implement The Eden Alternative Path to Mastery™ protocol, a longstanding model that promotes person-centered care, within eight Tennessee nursing homes in two phases (Milestone 1 and Milestone 2). Comprehensive culture change training and implementation will empower participating homes to shift from an institutional model of care to person-centered care and practices focusing on individuals’ choice, dignity, respect, self-determination, and purposeful living.

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 2021-04-TN-0106 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, the Quality Improvement Organization 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 Service

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