

What is a Civil Money Penalty (CMP) Reinvestment Extension Project?

*A CMP reinvestment project is considered an "extension project" if it is similar in project details to an in progress or completed project approved after April 1, 2018 (same applicant and/or same collaborating partner, similar project focus, but to a different nursing home population). Applicants applying for an extension of an approved CMP reinvestment project to new nursing home location(s), do not have to complete the entire application. **CMP reinvestment extension projects cannot exceed three years (36 months).***

The CMP Reinvestment Application Resource Guide also provides guidance around applying for extension projects.* Applicants must submit the approval letter for the approved CMP reinvestment project and complete the following sections of the Example CMP Reinvestment Application Template: Applicant Contact and Background Information (sections 1-2a, and 6); Funding (sections 7-9); Project Title (section 10), *Section 10a*, Number of Nursing Homes (section 10b), Previous Unique Identifier (section 10c - if applicable); Project Time Period (section 11); Partnering Entities (section 15 for non- nursing home applicants and section 16 for all applicants, if appropriate); and Attestation (section 22).

Additionally, the applicant must submit results of the *previously approved, CMP-funded in progress or completed project (if applicable)*, with confirmation by the State Agency (SA). The frequency that the applicant submits CMP project results for review by the SA, is at the discretion of the SA and can be as early as 3 months on a 12-month project. Results must show that an applicant met the project's goals and objectives for an application extension to occur.

Note: Previous approval and funding of a project does not guarantee future approval of a similar project. Despite previous approvals, each CMPRP application receives an independent review based on its merit, content, clear need for the project, and compliance with current CMS regulation.

An applicant submitting an extension project must include a letter or email from the State Agency(ies) of the *previously approved, CMP-funded in progress or completed project*. In the letter or email, the SA needs to state whether the previous applicant met project goals and objectives, and whether the SA recommends expanding this applicant's project to other nursing homes.

Sample Attestation Language from the SA

"...Department of Health, Health Standards Section is pleased to affirm that the above referenced project met its goals and objectives...We are able without hesitation to recommend this project for further funding."

Extension Project Examples:

- A. A corporate nursing home entity submits a CMP application to implement The ABC Project within five of their 10 facilities. Upon successful completion of the project, the entity submits a CMP application to expand *a similar* project to their remaining 5 facilities. The State Agency must attest to the project's goals/objectives being met and whether they would recommend the entity and project expand to the remaining 5 facilities.

- B. An academic institution submits a CMP application to implement a project within 20 nursing homes in state "A". At a later date, the academic institution decides to expand *a similar* project to a different set of 20 nursing homes in state "B". It is the same applicant, *similar* project, and a different group of nursing homes. The State Agency in state "A" must provide an attestation of the project's results either by providing a letter or email in support of the project successfully meeting its *realistic, actionable* goals and quantifiable objectives, and that they would recommend the applicant and project expand to other nursing homes.

- C. A vendor submits a CMP application to implement a wound care training project in Texas. The applicant has been approved for *a similar* project in other locations or states. These projects may be completed or ongoing. Prior to receiving a recommendation for approval of the current application, the applicant must submit project results to the corresponding SA who must provide an attestation stating that the project has met its *realistic, actionable* goals and quantifiable objectives and whether they would recommend the applicant to extend the project to other nursing homes.

Questions or concerns may be sent to the CMPRP Team at CMPr-info@cms.hhs.gov.

*The above stated guidelines for an extension project, including references to application sections and page numbers, are provided on the CMP Reinvestment Application Template, available at <https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/CMP-Reinvestment-Application-Resources.zip>. For SAs using their own application template, it is their responsibility to ensure their application guidance, instructions, and template align with the current CMP Reinvestment Program guidelines, as described above and available in the CMP Reinvestment Application Resource Guide.