

2022 Indiana Civil Money Penalty State Plan

Introduction

This plan describes how Indiana will use Civil Money Penalty Funds for the 2022 calendar year. Questions about this plan should be directed to the point of contact listed below.

Abbreviations

COVID-19 – Coronavirus -19
CMP – Civil Money Penalty
CMS – Centers for Medicare & Medicaid Services
CY – Calendar Year
FTE – Full Time Equivalent
IDOH – Indiana Department of Health
LTC – Long-term Care
QAPI – Quality Assurance and Performance Improvement
RFC – Request for Contract
RFP – Request for Proposals

1. Timeline

Plan Start Date: January 1, 2022
Plan End Date: December 31, 2022
Date of Submission to CMS: November 15, 2021

2. State Points of Contact

<i>Primary Point of Contact</i>	<i>Secondary Point of Contact</i>
<p>Nancy Adams Director Program Performance & Development Indiana Department of Health 2 North Meridian Street Selig 4 Indianapolis, IN 46204</p> <p>(317) 233-7119 nadams1@isdh.in.gov</p> <p>INCMP@isdh.in.gov</p>	

3. Current CMP Balance

Indiana’s projected CMP funds balance as of January 1, 2022, is \$11,800,000.00.

4. CMPs Returned to the State

The amount of CMP funds returned to Indiana in 2021 was approximately \$888,746.18.

5. Emergency Reserve Fund Plan

For the planned calendar year, the state will reserve a portion of CMP funds for emergency situations such as relocation of residents during a closure. This amount will be the minimum of \$1,000,000.

We plan to reserve \$1,000,000 for emergency relocation of residents due to the possibility of natural disasters or facility closures. We have approximately 534 Medicare and Medicaid certified facilities. Tornadoes and floods frequently occur in this state sometimes damaging facilities or causing relocation of residents. In the past ten years we have had no requests for use of CMP funds for emergency relocation of residents, but as severe weather becomes more common these needs may occur.

6. Annual Administrative Use

Indiana estimates \$113,700 of CMP funds will be used for administrative use during the calendar year 2022. These funds will cover the salary and benefits for three staff, one staff member (0.50 FTE), one (.35 FTE), and one (0.05 FTE). The one staff (0.50 FTE) spending the most time on CMP matters will be writing CMP grant opportunities, evaluating CMP grant proposals, managing contracts with grantees, planning, and developing future CMP project ideas and providing education about CMP Project requirements. Time will also be spent monitoring 2 projects that are ending in CY2021 but will be submitting invoices and final information in 2022, 2 projects currently approved, and possibly 4-5 projects not yet approved, to assure that CMP funds are being used appropriately in each project. The remaining two staff will provide administrative support, data tracking, and website maintenance for the CMP program.

7. Obligated Funds Plan

The Projects listed are approved by CMS for use of CMP funds during CY 2022.

Project Title	Amount Obligated CY 2021	Contract Start/End Dates	Recipient of Funds
Antimicrobial Stewardship for “At Risk” Nursing Home Residents	\$873,712.	07/01/2020-06/30/2023	Antimicrobial Resistance Solutions

Healthcare Leadership Conferences	\$180,840.	07/01/2019-09/30/2022	Travel Leaders Indianapolis
-----------------------------------	------------	-----------------------	-----------------------------

The total amount of obligated CMP funds for continuing and/or new projects planned for CY 2022 is estimated to be \$1,054,552.

Unobligated and Unapproved Projects Planned for CY 2022

Currently there are no unapproved projects planned for CY 2022. The Indiana Department of Health is planning to submit 2-3 request for projects in November or December 2021.

8. Available Funds

The state’s available funds (as of January 1, 2022) for new CMP projects are \$9,631,748.

1.	Estimated CMP funds balance as of January 1, 2022	\$11,800,000.
2.	Amount of emergency CMP funds held in reserve for CY 2022	\$ 1,000,000.
3.	Projected administrative use for CY 2022	\$ 113,700.
4.	Total obligated CMP funds for continuing and/or new projects planned and approved for CY 2022	\$ 1,054,552.
5.	Available funds for CMP projects in CY 2022	\$ 9,631,748.

9. Public Posting of Funded CMP Projects

On an annual basis or as needed, Indiana will post the following information about each project funded to the Indiana Department of Health website on the [Indiana Nursing Home Civil Money Penalty \(CMP\) Project Center](#). The information available will include:

- a. Project title
- b. Project summary, purpose, and goals
- c. Project duration
- d. Dollar amount awarded each project
- e. Awardee name
- f. Project results (e.g., outcome measures, outcomes and lessons learned)

10. Solicitation Methods

Indiana will solicit CMP projects that benefit nursing home resident with goals of improving quality of life, quality of care and quality of place. CMP project selection criteria will focus on current trends or patterns identified by IDOH Consumer Services and Health Care Regulation Commission staff. This includes concerns or issues identified by facility needs assessment, survey deficiencies, regulatory changes, ombudsman concerns, provider organizations or other stakeholder identified issues. Attention will also be focus on infection control and prevention practices, reducing resident social isolation and improving resident, family, and staff communication. The target audience for solicitation of proposals will include individuals or

organizations that have experience and expertise in LTC and QAPI, education, availability of subject matter experts and healthcare resources, and successful experiences with grants / proposals. Projects will also need to include infection control and prevention standards and precautions.

The Director of Program Performance & Development Division will coordinate the selection, management, and oversight of the CMP projects. Selection of projects will include the input from the Assistant Commissioner of Consumer Services & Health Care Regulation, Director of Long-term Care, Deputy Director of Long-term Care and IDOH staff that are recognized as subject matter experts. This will include the identification of project topics, application process, review and selection of projects, submission of projects for CMS approval, and project permissible uses and prohibition.

Oversight of current projects includes the assurance that goals, deliverables, and expected outcomes are being met. Also, assisting with identifying solutions to challenges or problems that arise during the project course.

The following is a general description of the process for funding of CMP projects:

1. The Commission issues an RFP for projects on a biannual or as needed basis that will focus on improving the quality of care or quality of life of nursing home residents.
2. If the project is to be a grant the IDOH will post the CMP Reinvestment Application. This form will be completed by the applicants.
If the project is to be a contract, the IDOH will release a Request for Proposals through the Department of Administration web site.
3. After the deadline for applications / proposals, the IDOH reviews and selects projects for funding. The selection is based on an established scoring process.
4. CMS approval of projects is required. Once a project is selected, the IDOH submits a project proposal to the CMS Region V Office for approval. By its policy and procedure, CMS has 45 days to review or request additional information.
5. Once CMS approves, the IDOH completes the state contract process with the selected applicant.

11. Review Methods

CMP Proposal Review & Submission to CMS Process Timeframe

Process Step	Responsible Person	Timeframe	Explanation
Project topic/proposals received for CMP fund usage or Grant / RFP request for proposals	-Director Program Performance & Development -*Other relevant staff	Determine topics/ proposals request within 60 days.	Identify specific topics/issues that would directly benefit the resident, improve resident quality of care & life, and meet the CMP-RP requirements. Grants/ RFPs will be posted on the appropriate website
Review received topics/applications for approval / denial and CMS submission for approval	-Director Program Performance & Development -*Other relevant staff ff	Complete review & determine proposals for CMS submission within 60 days	Scoring based on a possible 100 points based on these categories: a. Grantee Capabilities b. Project Description c. Outcomes and Measures d. Monitor and Evaluation e. Sustainability f. Benefit to Resident g. Stakeholders h. Budget
Notification to applicant of the results of review, i.e. approve/deny	-Director Program Performance & Development	Within 7 days of determination	Letter/ email of approval / denial sent to applicant
Prepare proposal for submission to CMS Region V	-Director Program Performance & Development	CMS submission within 45 days	Discuss with applicant details of proposal. Projects will be formatted to meet the CMS guidelines
Submit proposal(s) to CMS for approval / denial & respond to request for additional information	-Director Program Performance & Development	CMS - approve / deny or additional information request within 45 days	Based on CMS – CMP RP policy Notify applicant of any additional request from CMS &/or clarification of proposal information.
Notification to applicant of CMS final approval / denial	-Director Program Performance & Development	10 days	Email notification of CMS approval/ denial. If approved start IDOH contract process.
Initiate IDOH contract process	-Director Program Performance & Development	10 days	Complete Request for Contract (RFC) form, Scope of Work and budget and send to IDOH Contract Division

Completion of contract	-Director Program Performance & Development	45-60 days	Preparation of contract by IDOH and state signature process completion, reply to request of information as needed
Contract approval notification to applicant		5 days	Notification of executed contract

*Other relevant staff is defined as current IDOH employees that have expertise related to the specific project subject matter. This expertise can be from education, specific knowledge, experience, or competence.

12. Monitoring and Tracking Methods

To ensure that CMP monies are used appropriately the IDOH Director Program Performance & Development will track project invoices and/or receipts. No CMP funds will be paid without appropriate invoices and/or receipts and approval from the Director Program Performance & Development.

Meetings either telephonically or in-person with CMP project directors are conducted as needed. In addition, semiannual reports are required to be submitted by the projects Coordinators / Directors. IDOH staff will also periodically attend project meetings or events. The IDOH Director Program Performance & Development will participate in projects meetings and conference calls. In addition, the IDOH Director Program Performance & Development or designee are active on project advisory committees and provide resources and guidance to project directors related to maintaining compliance with proposal content and CMS guidelines.

CMP administrative costs allowed by agreement with CMS are recorded throughout the year on a weekly or monthly basis. Indiana uses an electronic time and labor system for reporting time worked along with codes indicating the funding for the specific hours of work. The number of hours spent on CMP work is maintained on the time and labor forms stored electronically. This time is reviewed by the Director Program Performance & Development.

The outcomes of CMP projects are submitted by each grantee/contractor as part of semiannual, annual, and final project reports. Periodically the IDOH Director Program Performance & Development may discuss measures and outcomes with project staff. Discussion may include the focus of sustainability of the projects. Often this refers to the project deliverables such as, toolkit or education modules that will be posted on the IDH Healthcare Quality Resource Center.

Updated 11/22/2021