Examples of Non-Allowable Uses of CMP Reinvestment Funds

Research
An applicant requested funding for three years to develop and test educational models for training and a patient engagement assessment tool, however only six months of the project focused solely on the delivery of the training. This application is not appropriate for the use of CMP funds, because a large portion of the budget was for research (i.e., development and testing) to determine whether a tool was beneficial to residents rather than implementation of a program that directly benefits the lives of nursing homes residents.

Indirect Benefit to Nursing Home Residents
An application from a healthcare association requested funding to provide training to multiple nursing homes in the state, however the application did not contain letters of commitment or other documentation of demand for such a training from nursing homes. Therefore, while the requestor anticipates a certain level of participation, they would receive funds even if only a few facilities participate in the training. The budget also included costs for breakfast and lunch as part of the training event. This application is incomplete, because there is no evidence the applicant has nursing home buy-in to participate in the training, which could ultimately result in no direct benefit to residents. The application also proposed to use funds for refreshments, which is an inappropriate use of CMP funds.

Capital Improvements
An applicant requested funding for a new sound (e.g., intercom) system for the nursing home to replace the current system due to poor sound quality. This application is inappropriate, because it contains costs for permanently affixed audio components that are designed to upgrade the nursing home’s audio system.

Duplication of CMS Requirements
Nursing homes must meet emergency preparedness requirements of participation. Therefore, an application to assist a nursing home prepare for an emergency containing a funding request for satellite phones or other communication back-up systems, evacuation transportation, rentals of portable generators or air conditioning, and emergency water, food and medicine supplies is not appropriate for CMP funding.

Charging for Nursing Home Employee Salary
An application to implement a training program to improve staff engagement contained a request for funds to pay the salary of the training coordinator, who was an existing employee of the nursing home applicant. This application is inappropriate, because CMP funds cannot be used to pay for the salary of a nursing home employee.