



# CIVIL MONEY PENALTY REINVESTMENT PROGRAM

## Denied CMPRP Projects

This document serves as a resource for State Agencies to identify projects previously denied by CMS, along with the rationale for each denial, to assist in triaging applications before submission to CMS and to prevent resubmission of rejected projects. Applications that have been reviewed and denied by CMS are not eligible for resubmission ("*Per CMS correspondence, this application has been previously reviewed and denied. Applications for previously reviewed and denied projects may not be resubmitted.*"")

State Agencies play a crucial gatekeeping role in the CMPRP application process. They must ensure all applications meet both state-level and federal requirements, including compliance with CMS Memorandum [QSO-25-26-NH](#), before submission to CMS. During pre-submission review, SAs must verify that applications include only allowable uses of CMPRP funds, as detailed in the *CMPRP Application Handbook*, and coordinate with applicants to address any concerns or deficiencies. State Agencies have the authority to deny applications without CMS review but cannot approve applications independently—all approvals require CMS review and approval. Previous approval and funding of a project do not guarantee future approval, as each application is evaluated individually based on its merits and compliance with current program requirements.

Denied CMPRP Projects in 2025	
Project Title	Denial Rationale
<i>Stories in Mind</i>	<p>CMS has reviewed the proposal to implement a program titled <i>Stories in Mind, Activities to Improve Quality of Life – Memory/Reminiscence</i>. Based on CMS review:</p> <ul style="list-style-type: none"><li>• The application does not include sufficient justification as to why an exemption of more than 230% above the funding limits is required to implement the project in 19 nursing homes.</li><li>• The applicant does not provide any quantifiable target goals or objectives to measure the project against. Clear targets are necessary to evaluate the requested use of CMP funds and determine whether the project was successful.</li><li>• The application and budget (Excel) include several non-allowable costs, including subscription costs (e.g., Ancestry.com and JSTOR, an academic research platform) used for research purposes. Activities and expenses related to research are not a direct benefit to the nursing home resident and are a prohibited use of CMP funds.</li><li>• Requests of funds for Staff Professional Grief Training and Convention Attendance. CMP funds cannot be used for projects that do not clearly demonstrate a benefit to nursing home residents.</li></ul>



# CIVIL MONEY PENALTY REINVESTMENT PROGRAM

	<ul style="list-style-type: none"><li>Training curriculum and project materials must be fully developed prior to submitting a CMP Reinvestment Application. CMP funds may not be used for the development of these materials, including but not limited to curricula, handouts, toolkits, surveys, and similar resources. The application contains an expense related to using CMP funds for reserve equipment, which is not permissible.</li><li>The total cost for Contract Presenters for Engagements increases each year of the project implementation; however, if the project curriculum or program has already been developed or planned, the cost for this item should be clear and consistent.</li><li>Additionally, 82% of the total CMP funding requested is allocated to personnel related to project implementation. Due to the prohibited nature of this project, no corrective action will bring this application into compliance.</li></ul>
<i>Memory Lane TV</i>	CMS has reviewed the proposal to implement a program titled <i>Memory Lane TV, Activities to Improve Quality of Life – Memory</i> . <i>Memory Lane TV</i> (MLTV) is a streaming platform designed to support individuals with dementia by reducing behavioral and psychological symptoms such as anxiety, agitation, and depression through personalized, multisensory experiences. Delivered via standard TVs, MLTV offers residents short, easy-to-follow films enhanced with matching aromas to stimulate memory and calm residents. The project aims to reduce antipsychotic use and promote person-centered care. The requested project provides a streaming service for the residents which is not considered an allowable use of CMP funds.
<i>Enhancing Infection Prevention and Control in Skilled Nursing Homes with CSI Technology: A Data-Driven Approach to Facility Hygiene and Safety</i>	CMS has reviewed the proposal to implement a program titled <i>Enhancing Infection Prevention and Control in Skilled Nursing Homes with CSI Technology: A Data-Driven Approach to Facility Hygiene and Safety, Training to Improve Quality of Care – Patient Safety</i> for three years in one nursing facility. The project aims to improve residents' quality of care through infection prevention and control using CSI technology, designed to audit the cleanliness of resident care equipment and the environment, ensuring that high-risk surfaces are disinfected. The success of the project will be measured by staff competency assessed through completion of training modules and their proficiency in using CSI technology to identify contamination and manage cleaning tasks for at least 95% of relevant cleaning and infection control staff. CMP funds cannot be used to bring a facility into compliance. This is considered duplicative as it is already required by the nursing facility under 42 CFR § 483.80 (a). Due to the



# CIVIL MONEY PENALTY REINVESTMENT PROGRAM

	prohibited nature of this project, no corrective action will bring this application into compliance.
<i>Outdoor Life Enrichment</i>	CMS has reviewed the proposal to implement a program titled <i>Outdoor Life Enrichment, Activities to Improve Quality of Life</i> . The project aims to improve nursing home residents' quality of life by increasing outdoor activities. The applicant intends to use the pergola, popcorn machine, and BBQ grill to initiate bi-weekly barbecues and picnics and enhance residents' appetite. Per § 483.60 Food and nutrition services, the facility must provide each resident with a nourishing, palatable, well-balanced diet that meets his or her daily nutritional and special dietary needs, taking into consideration the preferences of each resident. The popcorn machine and BBQ grill are prohibited budget items. Per the QSO-23-23-NHs memorandum, outdoor furniture is also a prohibited budget item. The applicant does not provide any target goals or objectives to measure the project against. Clear targets are necessary to evaluate the requested use of CMP funds and determine whether the project was successful; however, the applicant does not provide any target goals or objectives that include the specific metrics that will be used to measure actions the nursing home must take to achieve the overall goal. Due to the prohibitive nature of this project, no corrective action will bring this application into compliance.

Denied CMPRP Projects Prior to 2025	
<b>Note: The denials were prior to the October 2025 program revisions (QSO-25-26-NH)</b>	
Project Title	Denial Rationale
<i>Friend to Friend Virtual Connection Program</i>	The project's focus is on creating a safe, efficient, and effective virtual connections environment to provide the residents an opportunity to participate in video calls with their loved ones to reduce feelings of isolation, depression, and loneliness amongst nursing home residents. The project's Virtual Connections Manager (VCM) will coordinate identifying residents, scheduling calls with families, and facilitating the video calls between residents and their loved ones. An independent review of this application was conducted based on the current needs of nursing home facilities and the status of the COVID-19 pandemic. CMPRP review has concluded that this program does not go above and beyond what is already provided by the nursing home facility. Also, requests for background checks, PPE, and infection control items are considered the responsibility of the nursing home to provide and are a prohibited use of CMP funds.



# CIVIL MONEY PENALTY REINVESTMENT PROGRAM

<i>Rekovo for Improved Balance Function</i>	The technology in the project aims to encourage resident participation in physical therapy by creating digital artwork through movements. The Rekovo system is a combination sensor, screen and HIPAA compliant software program that allows residents to create digital artwork while performing prescribed physical therapy or even daily exercise. The project has been thoroughly reviewed against current CMS regulation and determined that the Rekovo rehabilitation system technology overlaps with the current Medicare requirements and physical therapy staff responsibilities. See 42 CFR 483.20, 42 CFR 483.21, 42 CFR 483.25, and 42 CFR 483.65 for further clarification.
<i>The Enhanced Leadership Development Academy (ELDA)</i>	The project aims to work directly with long-term care nursing facility staff to help them learn best clinical practices, improve care delivery, and improve the outcomes for nursing home residents. This application meets the criteria as a continuation project. All three previous projects have different titles, however the projects core program has the same purpose, and target population. This project exceeds the maximum 36-month time period allocated for CMP funding. No circumstances will allow for additional months of project implementation.
<i>Improving the Quality of Care while Reducing the Spread of COVID-19 to Residents and Staff of Skilled Nursing Facilities through the Effective use of Telemedicine Project</i>	Telemedicine is currently not an appropriate use of CMP funds, as States may not use CMP funds to pay entities to perform functions for which they are already paid by State or Federal sources ( <a href="https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet">https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet</a> ). Due to the prohibited nature of this project, no corrective action will bring this project into compliance.
<i>Nurse Leadership Project</i>	The current project's budget is excessive in nature, when compared to other nationally accredited leadership training programs. The requested facility licensing fees are unsupported as the project does not contain a train-the-trainer component. The lack of facility and trainee agreements' lack of enforcement provisions raises the risk of CMP funds being wasted on trainees who may leave the LTC setting post certification. Moreover, there is not a direct correlation between nursing leadership training and resident satisfaction.
<i>Reducing Falls with AI Project</i>	VSTBalance technology uses AI to assess patient fall risk. This project has been thoroughly reviewed against current CMS regulation and determined that VSTBalance technology no longer qualifies for CMP funding due to the amount of funds requested and the scope of the project. There are also concerns with overlap with the current Medicare requirements and physical therapy staff responsibilities; therefore, no corrective action can bring this project into compliance. See 42 CFR 483.20, 42 CFR 483.21, 42 CFR 483.25, and 42 CFR 483.65 for further clarification



# CIVIL MONEY PENALTY REINVESTMENT PROGRAM

<i>To Relax Me – A Method to Enhance Quality of Life</i>	The program seeks to provide massage and music therapy to residents in nursing homes. The goal of the project is to utilize massage and/or music therapy to relieve stress, anxiety, depression, pain, and insomnia for the nursing home residents. Upon review by the CMPRP Team, it has been determined that the proposed project contains several issues surrounding the requested costs and intended uses of CMP funds. The applicant has requested more than \$1 million in CMP funds for medical massage chairs and tablets, which are both prohibited uses of CMP funds. Furniture is the responsibility of the nursing home to provide and cannot be purchased using CMP funds. Since the nature of this program relies on the purchase of massage chairs and tablets, this application cannot be brought into compliance.
<i>Building a Culture of Safety in Veterans Centers</i>	The project is expected to reach nursing facilities over a 3-year period. Nursing home staff, surveyors, and stakeholders will be provided with a quality improvement program utilizing safety science virtual trainings to build a safety culture with lower turnover, fewer adverse events, better quality care and service, and greater job satisfaction for staff. The CMPRP Team has completed review of this application in accordance with CMS guidance and determined that the personnel costs are excessive for the requested project and do not demonstrate a reasonable use of CMP funds.
<i>Reducing Antipsychotic Use through Non-Pharmacological Management of Challenging Behaviors</i>	The project aims to provide nursing homes with education and technical assistance on non-pharmacological approaches to dealing with challenging dementia behaviors. Upon further review, it has been determined that the antipsychotic goals of the project and the project details overlap with the responsibilities of the CMS Quality Innovation Network-Quality Improvement Organization (QIN-QIO). CMP funds cannot be used to fund activities for which QIN-QIOs are already receiving federal funding to complete.
<i>Notify Communication and Resident Quality of Care Improvement Project.</i>	The project aims to enhance resident care through improvement to staff communication by 1. conducting staff training for 100% of nursing on Notify system, 2. informing resident and family councils of the project, and 3. achieving 100% compliance on Notify system usage. The proposed project does not go above and beyond the responsibility of the nursing home to ensure timely response to resident calls and ensure resident fall safety precautions are in place. CMP funds cannot be used to meet standard CMS requirements or substitute staff duties.
<i>Appetizer Program</i>	The project will require the purchase of two refrigerated salad bars, salad bar pans, two plate/utensil carts, a beverage dispenser, and salad bar mirrors to offer nursing home residents appetizer choices prior to their main meal being served. CMP funds may not be used for services or supplies that are the responsibility of the nursing home to provide.



# CIVIL MONEY PENALTY REINVESTMENT PROGRAM

<i>I'm Still Here Certification Training</i>	The program is designed to be a sustainable, comprehensive solution that creates long term culture change within an organization. By receiving this training, the applicant plans to improve the quality of life for residents living with dementia. The applicant's goals surrounding anti-psychotic usage and rehospitalizations are considered an overlap with the responsibilities of the CMS Quality Innovation Network-Quality Improvement Organization (QIN-QIO). CMP funds cannot be used to fund activities for which QIN-QIOs are already receiving federal funding to complete.
<i>Secure Seniors</i>	This is a three-year pilot project for vulnerable adults in nursing home settings to Dallas/ Fort Worth Alzheimer and dementia care communities. Facility staff will be trained, including administrators, business office staff, social service personnel, and others involved in the admission and/or discharge processes in order to understand what financial abuse is and become skilled in their roles in recognizing, preventing, recording, and reporting suspected financial abuse of residents. Projects should already be developed prior to the submission of the application. The project also appears to be a conflict of interest.
<i>Eversound Resident Engagement and Interaction Project</i>	Referred to as an engagement amplifier, Eversound is specifically designed to help deliver sounds directly and without distraction into the ears of those with hearing deficiencies or who lack focus due to dementia. A simpler alternative to hearing aids, users wear a comfortable set of over-the-ear headphones that are connected wirelessly to a microphone or any other audio input source like a TV or music playing system. Eversound is an engagement modality that eases the consequences of hearing impairment. Hearing aids are paid for by Medicaid and facilities are responsible to ensure residents have assistive devices for maintaining hearing.