Department of Health & Human Services Centers for Medicare & Medicaid Services Chicago Division of Survey & Enforcement 233 North Michigan Avenue, Suite 600 Chicago, IL 60601-5519



## August 1, 2022 E-mail only

Ms. Amy Hogan
Ms. Julie Davis
Nursing Facility Policy, Ohio Department of Medicaid
50 West Town Street, Suite 400
Columbus, OH 43215
Amy.Hogan@medicaid.ohio.gov
Julie.davis@medicaid.ohio.gov

## **SUBJECT: Approval of Request to Use CMP Funds**

Dear Ms. Hogan and Ms. Davis:

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 Vohra Wound Physicians of FL, LLC. for \$155,049.30 to implement a program titled OH-0722-VWPF-987 / OH-0622-VWPF-975, *Ohio's Wound Care Excellence Program for Skilled Nursing Facilities*. The project will target 200 nursing home facilities in the State of Ohio over a 3-year term. The Ohio Wound Care Excellence Program for skilled nursing facilities has the objective of closing the knowledge gap related to wound care for nurses working at skilled nursing facilities in the entire state of Ohio. The Vohra Wound Physicians online nurse continuing education program in wound care increases the wound care knowledge level of nurses across the state. Vohra Wound Physicians has more than 20 years of wound care expertise and wound care nurse education has been one of the most important pillars of success in optimizing patient outcomes, by reducing healing time, amputation rates and rehospitalization rates. By providing a nationally recognized, clinically proven, self-paced, completely online wound care continuing education program, available to all CMS Certified skilled nursing facilities in Ohio, the applicant addresses the three top reasons that prevent nurses from implementing evidence-based best practice: Time, Lack of Knowledge/Skills, and Lack of Access to Information.

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 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 Juan Molina (<u>Juan.Molina@cms.hhs.gov</u>) at the Chicago LTC Branch.

Sincerely,

Tamika J. Brown Branch Manager Chicago LTC Branch

Samera f. Brown

cc: CMS Quality Assurance