

Civil Money Penalty (CMP) Reinvestment State Plan Submission Template

Introduction

This plan describes how states will use Civil Money Penalty (CMP) funds for the upcoming calendar year. Questions about this plan shall be directed to the point(s) of contact listed below in section 2.

Enter State:

1. Timeline

Plan Start Date: 1/1/2026

Plan End Date: 12/31/2026

Plan Year (relevant calendar year): 2026

Date of Submission to CMS: 10/31/2025

2. State Points of Contact

| <i>Primary Point of Contact</i> | <i>Secondary Point of Contact</i> |
|---|-----------------------------------|
| Name: Stephanie Goetz | Name: |
| Title: Nursing Facility Section Supervisor | Title: |
| Office: MT Department of Public Health and Human Services Senior & Long Term Care Division | Office: |
| Office Address: PO Box 4210 Helena, MT 59604-4210 | Office Address: |
| Phone Number: (406) 439-3038 | Phone Number: |
| Email Address: stephanie.goetz@mt.gov | Email Address: |

Plan for the Use of CMP Funds

3. Current CMP Balance

The state's projected CMP balance as of January 1 for the calendar year covered by this plan is
\$ 9,468,167.00

4. CMPs Returned to the State

The Current CMP Balance (section 3) includes CMP funds returned to the state in the previous year for the Medicaid portion of the CMP.

Provide the amount (actual or projected) of CMP funds returned to the state during the previous applicable calendar year. The state should enter the date the balance is obtained.

\$ 1,236,873.04. Date (format: MM/XX/20YY): 10/20/2025 .

5. Emergency Reserve Fund

For the plan year, states should reserve a portion of the Current CMP Balance (section 3) for emergency situations, such as natural disasters and/or the relocation of residents pursuant to an involuntary termination from Medicare and Medicaid. This amount must be sufficient to indicate that a state is prepared to respond to emergencies while at the same time not maintaining a significant amount of unused CMP funds.

The amount allocated for the Emergency Reserve Fund for the calendar year covered by this plan is
\$ 500,000.00 .

Describe how the state will use emergency reserve funds, *such as the relocation of residents due to natural disasters or pursuant to an involuntary termination from Medicare and Medicaid, and the number of certified beds in the state. See the CMP Reinvestment State Plan Resource Guide for further guidance.*

Senior and Long-Term Care Division (SLTCD) plans to reserve \$500,000 for emergency relocation of residents due to the possibility of natural disasters or facility closures. Currently Montana has 4,997 certified beds in 60 facilities that are Medicaid/Medicare certified. This includes three veteran's homes and two Native American facilities. These five facilities are certified facilities with CCNs. Montana has not accessed CMP funds for emergency use. However, in 2022, Montana came very close, within 3 days, of one facility falling into receivership. If that had happened, the cost estimate would have been approximately \$250,000.

Should Montana experience the need to use Emergency Reserve Funds, the following amounts from 2022 guide current operating costs of a contracted facility, which is approximately \$5,274,200 per year or a daily rate of approximately \$14,500. The state anticipates the following costs in the event of an emergency situation and/or relocation of residents due to an involuntary termination from Medicare and Medicaid: staffing and additional administration, state agency involvement to include legal and administrative costs related to receivership, additional travel costs to transition a resident, and short term staffing needs. While it appears Montana has excess beds available, providers have had to address current challenging market trends by adjusting their internal controls by, for example, addressing a staffing shortage by reducing their resident census capacity and/or case mix. Montana is hopeful for market stabilization that in turn improves stakeholder access to long term care services and supports.

6. Annual Administrative Use

For the plan year, states can choose to allocate a portion of the Current CMP Balance (section 3) for Administrative Use.

The amount estimated for Administrative Use for the calendar year covered by this plan is
\$ 79,021.00 . If the state does not intend to use CMP funds for Administrative Use, enter '0' (zero).

Note: Please provide an estimate that accounts for all expected administrative costs. Actual funds expended for the calendar year should not exceed the estimate provided. If additional funds are needed

for administrative use, the state must submit the request to the CMPRP Team in an amended plan for review. The amended plan must be approved by CMS prior to expending additional funds for administrative uses. If using CMP funds for Administrative Use, describe below how the funds will be used. Include adequate details and justification for the requested amount, including position description(s) and a breakdown of salary and benefits for each position (e.g., salary and benefits for one full-time staff [1FTE] to oversee the evaluation of approximately 60 CMP applications submitted for review as well as the administration and monitoring of approximately 20 CMP awards). Enter 'N/A' below if the state does not intend to use CMP funds for Administrative Use.

Note: Avoid potentially prohibited or problematic costs (e.g., administrative expenses beyond those necessary to administer, monitor, evaluate, or report on the effectiveness of projects utilizing CMP funds).

SLTCD estimates \$79,021 will be used for Administrative use during the 2026 calendar year. This will cover 1.0 FTE staff time and expenses associated with the CMP Program.

Personnel services and personnel benefits total \$71,521, including \$55,016 for salary and \$16,505 for benefits. Operating costs including supplies and travel for a total of \$7,500. Supply costs are estimated at \$2,000 and include general office supplies and costs associated with printing for activities related to CMP. General office supplies include items such as envelopes, folders, and binders and would only be used for CMP related purposes. Staff will be responsible for CMP related activities including application solicitation, outreach, review, processing and contracting. Administrative costs include overseeing 6-8 new applications per cycle, which may result in 12+ contracts to manage across a year in addition to the ongoing awards.

7. Obligated Funds

For the plan year, states may have projects they are obligated to fund (for the implementation or continued implementation of any continuing and/or new projects).

The total amount of Obligated Funds for projects approved for the calendar year covered by this plan is \$ 4,416,900.45

Include a list of continuing projects and/or new projects **approved for the calendar year covered by the plan**. List each project title, the amount obligated for each approved project, the start and end dates of each project, and the recipient of funds. For multi-year projects or projects that are one year or less but span multiple years please enter the funds obligated for the calendar year covered by this plan. If more space is needed, an extended sheet is provided in section 13. Please make sure the total amount of Obligated Funds in the extended sheet is reflected in the total above.

| <i>Project Title</i> | <i>Amount Approved for the Plan Year</i> | <i>Start and End Dates</i> | <i>Recipient of Funds</i> |
|----------------------|--|----------------------------|---------------------------|
| | | | |

| <i>Project Title</i> | <i>Amount Approved for the Plan Year</i> | <i>Start and End Dates</i> | <i>Recipient of Funds</i> |
|--|--|----------------------------|---|
| The Java Project: Addressing Loneliness and Social Isolation (Extension) | \$5,000/yr Total: \$15,000 | 11/1/2024-10/31/20 27 | The Village Health and Rehabilitation |
| SNFClinic (Extension) | \$29,880/yr Total \$89,640 | 11/1/2024-10/31/20 27 | Long-Term Care Consultants, LLC |
| ALZPro: Workforce Training (Extension) | \$51,916.45/yr 2 Total:\$102,179.31 | 1/1/2025-12/31/202 6 | Alzheimer's Association |
| Therapeutic Harp Music | \$4,980/year Total: \$14,940 | 3/1/2025-2/28/2028 | Live Therapeutic Harp Music Program |
| Nursing Home Staffing Campaign | \$4,325,124 | NA | NA |
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8. Available Funds

For the plan year, states may have additional CMP funds available after accounting for funds going towards the Emergency Reserve Fund (section 5), Annual Administrative Use (section 6), and Obligated Funds (section 7).

Rows 1 through 4 will auto-populate with the amounts reported in the previous sections. **Row 5 will auto-calculate** the amount of available funds. (If needed, please manually enter the amounts or verify that the amounts are accurately reported from the previous sections. To calculate, please take the total amount provided in section 3 and subtract the total amounts in sections 5, 6, and 7.)

See the [CMP Reinvestment State Plan Resource Guide](#) for further guidance.

| | | |
|----|--|--------------|
| 1. | Current CMP Balance (from section 3) | 9,468,167.00 |
| 2. | Emergency Reserve Fund (from section 5) | 500,000.00 |
| 3. | Annual Administrative Use (from section 6) | 79,021.00 |
| 4. | Obligated Funds (from section 7) | 4,416,900.45 |
| 5. | Available Funds (automatically calculated) | 4,472,245.55 |

Plan for Public Posting, Solicitation and Review Methods, Monitoring and Tracking Methods

9. Posting of Funded CMP Projects

On an annual basis, states must post the following information to a publicly available location about each funded CMP Project:

1. Project title;
2. Duration of the project (project start and end dates);
3. Dollar amount awarded for each approved project;
4. Project summary that includes the purpose of the project, the project's quantifiable goals and/or objectives;
5. Awardee name (entity approved to receive funding);
6. Results of projects (i.e., a description of the project's outcomes including the project's goals and/or objectives that were achieved or not achieved); and
7. Any other key information, such as whether improvements have been institutionalized as a result of the project.

CMS will obtain this information from states annually through the CMP Project Tracking Sheets and will post the project information to the CMS CMP Reinvestment website.

Describe below the publicly available location (e.g., state website, CMS CMP Reinvestment website, state newsletter) where information about CMP projects can be found. Please provide the full state/public website address if applicable.

SLTCD maintains documents on the Civil Monetary Penalties website at:
<https://dphhs.mt.gov/sltc/cmp>. Information is also provided on the MT Medicaid Provider site under the "Civil Money Penalties Program" tab:
<https://medicaidprovider.mt.gov/26>

Projects are also listed on the CMS CMP Reinvestment website:
<https://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/LTC-CMP-Reinvestment.html>

10. Solicitation Methods

Describe where (e.g., websites, notices to the Ombudsman's office, presentations to the nursing home provider community) and how often (e.g., monthly, quarterly, annually) the state will solicit for CMP projects that benefit nursing home residents and that protect or improve their quality of care or quality of life. States must solicit for CMP projects at least annually.

Include relevant details to describe the solicitation methods: who is responsible, when, where, and the target audience. If applicable, provide information on the types of projects intended to be solicited (e.g., dementia care, music and memory) and any standard language or requirements that will be included in each solicitation notice.

Solicitation for applications that benefit nursing home residents is conducted through the outreach channels of the MT DPHHS Senior and Long Term Care Division for each grant application cycles which occur in February and August. Communications are distributed to approximately 15+ organizations and associations, Ombudsman contacts, Area Agencies on Aging, and to all nursing facilities in Montana. Distribution lists are maintained by SLTCD. Information is provided to potential applicants as they are directed to find the application materials on our website:
<https://dphhs.mt.gov/sltc/cmp/>

Information continues to be available on the Montana Medicaid provider website: <https://medicaidprovider.mt.gov/26> under "Civil Monies Penalties (CMP)" with links to details and application information to the newly created website.

The CMP program is promoted at association conferences including the Montana Healthcare Association conferences and is shared during quarterly provider meetings with nursing facilities.

SLTCD created a one-page flyer that is downloadable from our website for promoting the program. This can be found:
<https://dphhs.mt.gov/assets/sltc/CMP/MontanaCMPFlyer.pdf>

The target audience is nursing facilities, associations, organizations (veterans groups, non-profits, etc.), and agencies who provide services or have an interest in bettering the lives and improving quality of care of those in nursing facilities. Montana seeks a variety of 1-3 year projects to increase quality of care and quality of life for nursing home residents. Priority need projects Montana hopes to receive applications addressing include: decreasing use of anti-psychotic drugs/nonpharmacological interventions for dementia care, increasing infection control, increasing resident and staff safety, and increasing retention of front line workers to maintain the quality of care in facilities.

SLTCD provides a general list of potential project types along with a link to the CMS website for other ideas in our informational document on our website at the link above.

11. Review Methods

Describe methods and criteria the state will use to objectively and consistently review and evaluate incoming applications to determine if the proposal meets the criteria for acceptable uses of CMP funds.

Include relevant details that describe the application review methods, such as personnel reviewing applications, criteria to be used to evaluate applications, expected timeframe for review, and process for submitting applications to CMS.

Applications are reviewed by the Nursing Facility Section Supervisor, Program Officer and Claims Specialist. The Community Services Bureau is consulted during the application process and the SLTCD Administrator approves or denies submission of applications to CMS based on team review/recommendations.

Applications received during the February and August application cycles are reviewed within 10 days of receipt by the review team. The team reviews the applications for compliance with the federal CMP regulations, completeness of required items, and how well the application addresses improving quality of care and quality of life for nursing home residents.

When an application meets the criteria, applications are forward to the SLTCD Administrator for approval to submit to CMS for approval. Submission to CMS is completed within 5 business days of approval from the SLTCD Administrator.

When an application does not meet the requirements the applicant is notified of any corrective action they can take to revise the application to meet the requirements. The team then reviews the updated application and either forwards to the SLTC Administrator for review and approval and submission to CMS, or the application is rejected. This process is performed a maximum of two times before the application is rejected. Applications are typically reviewed and approved or denied within a month timeframe.

12. Monitoring and Tracking Methods

Describe how the state will monitor and track projects that use CMP funds, as well as how the state will monitor and track CMP funds that have been allocated and expended for Administrative Use (section 6). Provide information about how the state will verify that the monies paid out for the CMP project were spent on the items identified by the CMP fund recipient (e.g., site visits, invoices, timecards, receipts for supplies, and travel).

Describe how the state will track project results (e.g., periodic or standard reporting deadlines, deliverables, final report, tracking of metrics). Describe how the state will track monies expended for Administrative Use purposes.

To ensure CMP funds are used as outlined in applications: all project monthly invoices are checked against the project contract and budget; status and/or final reports are required of all grants; and progress check-ins are conducted with applicants/awardees twice a year for grants lasting longer than 6 months.

Staff salaries paid with CMP funds for administrative purposes will be direct charged as staff spends time on CMP activities. A monthly financial report along with a projection of expenditures are done to ensure administrative uses of CMP funds are accurate and will not exceed the allowable amount.

To track results of each CMP project, Montana requires that contractors submit a mid-way and a final report for all projects with durations less than 12 months, and a quarterly report and final report for all contracts with projects with durations greater than 12 months. The report will detail the progress made on the measures originally outlines by the applicant to evaluate success, emphasizing quantitative measures whenever possible.

13. Extended Sheet for Obligated Funds

If applicable, use this space for additional project information from section 7. Please make sure the total amount of Obligated Funds in section 7 reflects the projects included in this extended sheet.

14. CMP Project Tracking Sheet

By February 1st of each year, states must complete and submit the CMP Project Tracking Sheet (Excel spreadsheet) to the Centers for Medicare & Medicaid Services (CMS) Branch and the CMPPR mailbox at CMP-info@cms.hhs.gov. The CMP Project Tracking Sheet should contain information on projects that were implemented during the previous year. **See the CMP Reinvestment State Plan Resource Guide for further guidance.**