



FEB 27 2007

Administrator
Washington, DC 20201

The Honorable Thad Cochran
United States Senate
Washington, DC 20510

Dear Senator Cochran:

Thank you for your letter endorsing the innovative model of care for nursing homes known as the Green House model, developed by Dr. William Thomas, founder of the Eden Alternative. I am pleased to let you know the Centers for Medicare & Medicaid Services (CMS) is familiar with this model of care that seeks to improve quality of life for residents through the development of small care households with consistent staffing and the introduction of many features of home and community-based care. We have been consulting with leaders of the Green House Project, as well as other organizations that are part of the culture change movement, and seeking the participation of these organizations as part of our long-term care stakeholder groups.

We have reviewed the program and policy materials that guide the Green Houses, as well as their standard architectural plan, and have found no barriers that would prevent them from being qualified as nursing homes under Federal regulations. We are supportive of this effort and the larger culture change movement, of which it is a part. We believe these innovations more fully implement the Nursing Home Reform provisions of the Omnibus Budget Reconciliation Act of 1987, from which our CMS nursing home regulations are derived.

The CMS has been participating in a variety of efforts to engage in communication with culture change innovators and to inform our survey agencies of how these innovations can comply with Federal requirements. In addition to the large-scale project currently underway in which CMS' contractors and the Quality Improvement Organizations (QIOs) are working with nursing homes across the Nation to assist them in learning about culture change principles and practices, our survey and certification staff have been pursuing various culture change initiatives, with more planned for the next year.

This past summer, we invited the Green House Project leaders to participate in an interactive video conference with our CMS Regional Office (RO) survey staff, as well as Central Office staff, in order for them to explain their principles and current project to replicate Green Houses in all States. We found the exchange of information valuable, and we hope to continue close contact with this project as it proceeds to assist providers to build more of these innovative care settings. We are also aware of the preliminary research results presented by Dr. Rosalie Kane and her colleagues concerning their evaluation of the Tupelo, Mississippi, Green Houses. Dr. Kane's findings regarding the outcomes for residents living in a more home-like setting are extraordinary in terms of improvements the residents have made in their level of functioning and well being.

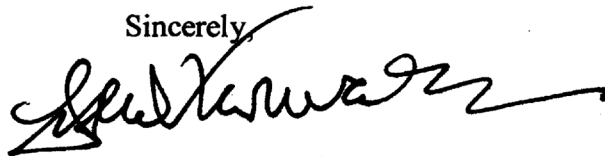
We have also been communicating with State survey agencies (SAs) and our ROs regarding the value of the Green Houses through our April 2006 CMS broadcast, "Volume III, Nursing Home Journal, the Activities Requirements," which is mandatory for all surveyors to view. It is currently stored on our broadcast Web site: www.cms.internetstreaming.com. In this broadcast, we highlight the Green House setting's home-like activities as well as the activities of an innovative nursing home that has retained its large building but converted it into functional "neighborhoods." In addition, our Central Office and RO staff have been participating in both QIO conferences and meetings with State agencies, provider groups, and culture change State coalitions to provide information on the compatibility of Federal regulations which culture change providers have been making.

We have also been planning a set of culture change events for fiscal year 2007 as part of the current CMS action plan for quality improvement in nursing homes. These include a series of interactive video/audio conferences for our ROs and State agencies on various culture change topics; a series of four broadcasts on culture change topics in collaboration with the QIOs, and a national symposium on culture change as it pertains to the physical environment regulations and life safety code.

We included discussion of the Green House Project's compliance with Federal regulations during the video/audio conference we held for States and our ROs on January 31, entitled "Culture Change for Regulators." It is our goal to have State agencies assist innovative providers in determining how changes they wish to make to improve the lives of their residents can be compliant with the Federal regulations that protect all residents.

Thank you for your support of this exciting initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Leslie V. Norwalk", with a long horizontal flourish extending to the right.

Leslie V. Norwalk, Esq.
Acting Administrator