

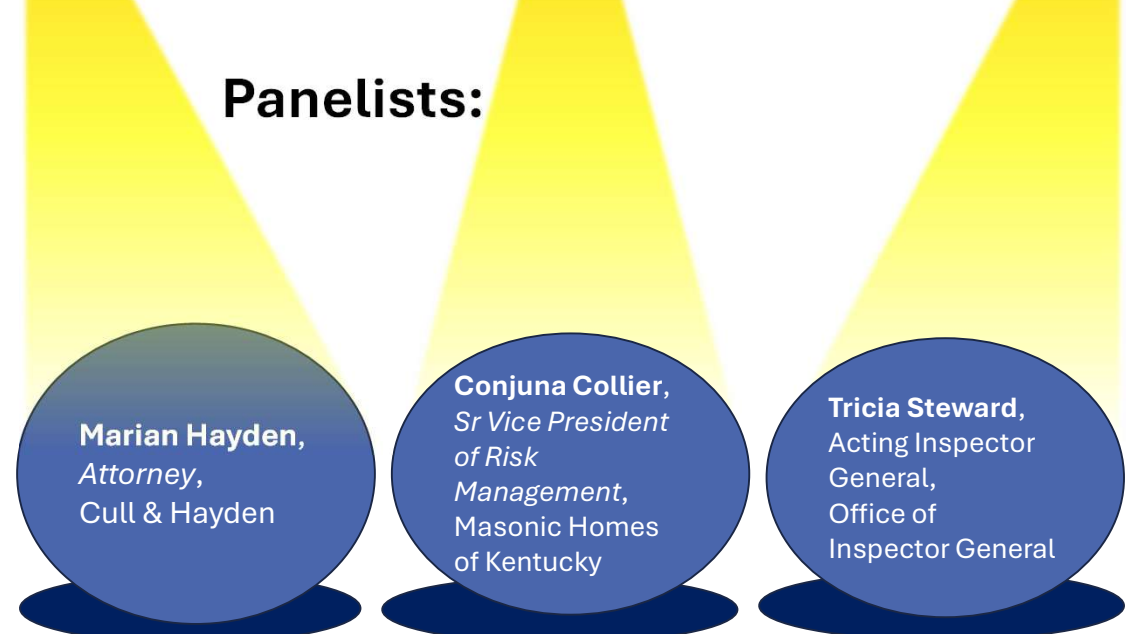
**Session 3:
Mastering
Compliance:**

**Crafting Effective
Plans of Correction and
Allegations of Compliance**

A cartoon illustration of a woman with blonde hair, wearing a blue top hat, a blue dress with a red collar, and yellow buttons. She is holding a red megaphone in her left hand and a white pointer in her right hand. She has a cheerful expression.

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Panelists:

Three blue circles representing panelists, each under a yellow spotlight. The circles are arranged horizontally and each has a dark blue shadow underneath. The text inside each circle is white.

Marian Hayden,
Attorney,
Cull & Hayden

Conjuna Collier,
*Sr Vice President
of Risk
Management,*
Masonic Homes
of Kentucky

Tricia Steward,
*Acting Inspector
General,*
Office of
Inspector General

Moderator: Lisa Biddle-Puffer, *Vice President of Quality and Regulatory Affairs,* KAHCF/KCAL

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The Ringmaster's Drumroll

Plans of Correction (POC) and Allegations of Compliance (AOC)

- Safeguard facility operations
 - Keep the show running smoothly!*
- Achieve regulatory compliance
 - The main act in staying compliant!*
- Strategies for drafting effective POCs and AOCs
 - Your toolkit for a stellar performance!*
- Key insights from compliance experts
 - Tips to dazzle during challenging acts!*



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Plans of Correction (POC) and Allegations of Compliance (AOC)



Act 1: Differences and Timing of POCs and AOCs



Act 2: Survey Agency Review Process



Act 3: Pitfalls and Tips



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Spotlight on Differences

Plan of Correction (POC):

- A detailed, **facility-developed** document outlining **corrective** actions to address cited deficiencies.
- Includes specific steps, responsible personnel, and completion dates.

Allegation of Compliance (AOC):

- A formal statement or certification submitted by the facility, asserting that it has completed all corrective actions and restored compliance.
- Accompanied by supporting **documentation**, if required.

Together, POCs and AOCs ensure facilities perform a high-wire act of compliance and accountability.

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How POC and AOC Work Together

Purpose Alignment:

- The POC addresses the “*how*” of correction, detailing the steps to rectify deficiencies.
- The AOC confirms the “*when*” and verifies that corrective actions have been executed effectively.

Integration for Success:

- Both documents are critical to demonstrate a facility’s commitment to compliance



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Timing is Critical

Hitting Deadlines with Precision:

- Regulatory deadlines are non-negotiable. Delays in submitting POC or AOC can lead to escalated enforcement actions.
- Prompt submissions demonstrate responsiveness and commitment to compliance.

Tips to Stay in the Air:

- **Track Deadlines:** Maintain a compliance calendar to monitor due dates for each POC and AOC.
- **Assign Responsibilities:** Clearly define roles to manage and execute corrective actions efficiently.
- **Review and Approve:** Establish internal checkpoints for reviewing and approving documents before submission.



In the compliance arena, timing is everything.

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Managing Deadlines and Prioritizing Actions

Set Priorities: Focus on high-risk areas first to mitigate potential harm and avoid escalated citations.

Keep the Troupe in Sync : Ensure consistent communication between departments to coordinate and track corrective actions.

Record every trick: Document detailed records of all corrective steps to support your AOC.



Launch your compliance efforts with precision and control!

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Survey Agency Review Process

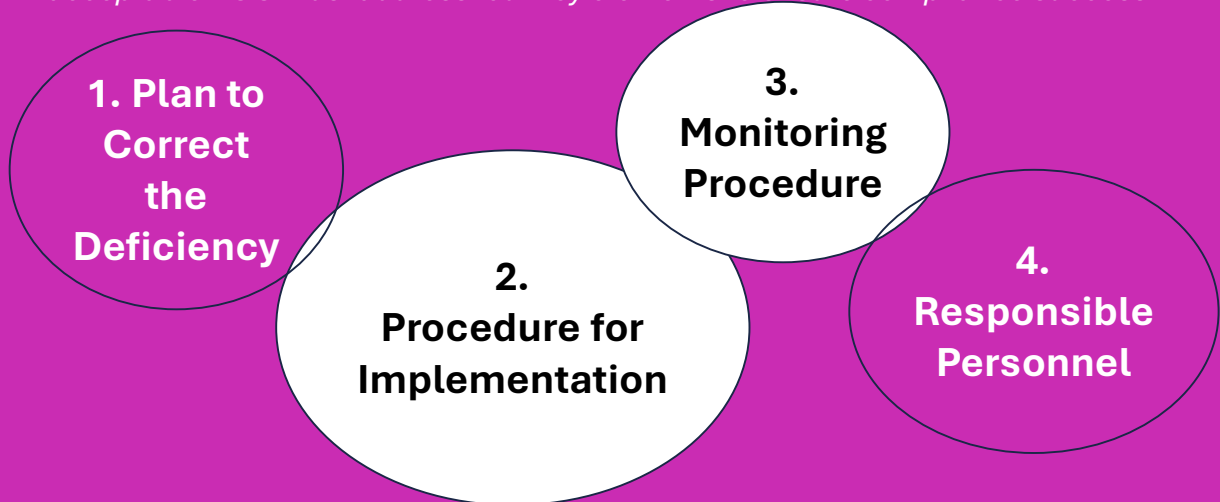
The survey agency will look for required elements for

- *An acceptable Plan of Correction*
- *A successful Allegation of Compliance*

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The Four Rings of a Successful POC

An acceptable POC must address four key elements to ensure compliance success:



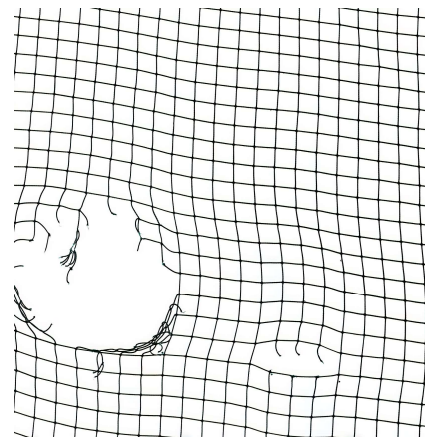
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Ring One: Fixing the Deficiency

- Describe how to correct the specific deficiency.
- Identify and address the processes that led to the deficiency.

Example:

- If staff training was insufficient, develop a plan to conduct focused in-service training sessions.



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Ring Two: Putting the Plan into Action

- *Detail the step-by-step procedures to implement the plan.*
- *Include specific actions to prevent recurrence.*

Example:

- Update training materials, hold department-wide meetings, and revise internal protocols.



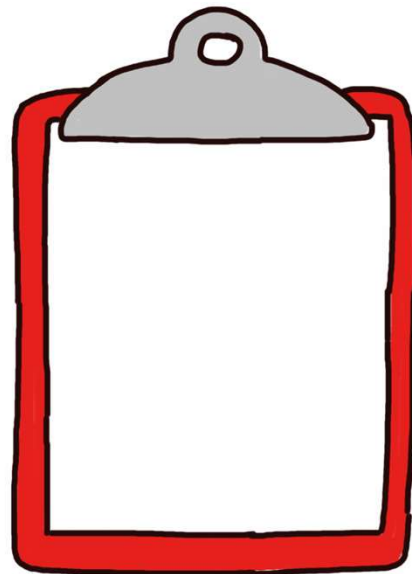
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Ring Three: Keeping the Act on Track

- *Outline the monitoring process to ensure effectiveness.*
- *Explain how ongoing compliance will be tracked and maintained.*

Example:

- Use daily audits, weekly reviews, and staff feedback to monitor progress.



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Ring Four: Who's Running the Show?

- *Identify the title of the person responsible for implementing the plan of correction.*
- *Ensure this person has the authority and resources needed to succeed.*

Example:

- *“The Director of Nursing will oversee the staff training process and provide progress reports to Quality Assurance.”*



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Allegation of Compliance Action Plan: The Spotlight on Resident Safety

- **Purpose:** The focus is to remove the immediacy of the IJ, ensuring residents are not at risk.
- **First Action:** Identify the root cause of the IJ.



Resident Safety is the Priority

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Key Components of the AOC

Resident(s) Affected:

- Actions taken to remove the IJ for affected residents.
- Include staff titles and dates for actions.

Training:

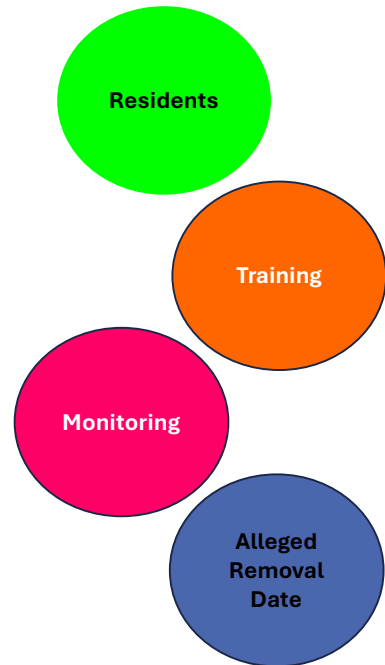
- Topics covered and who attended.
- Include staff titles, trainers, and training dates.

Monitoring:

- What is monitored, how often, and who monitors.

Alleged IJ Removal Date:

- Specify the removal date (must differ from corrective action date).



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Actions for Resident(s) Affected by the IJ

Steps Taken:

- Specific actions to remove the IJ.



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Equipping the Performers: Staff Training

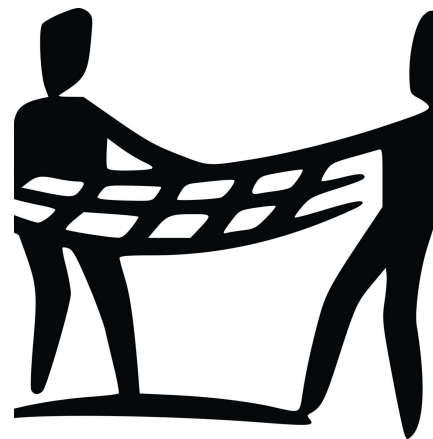
- Type of training provided.
- Staff titles who attended and trainers involved.
- Systems to ensure all staff are trained, including new hires and agency staff.



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Ensuring the Show Goes On: Monitoring

- What is being monitored related to the IJ.
- Frequency of monitoring.
- Titles of staff responsible for monitoring.
- Actions based on identified issues.



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Alleged IJ Removal Date

- Specify the date when the immediacy of the IJ no longer exists.
- Reminder: Date must differ from the corrective action date



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Clarity and Understanding

Understand the root cause to develop an effective AOC.

Contact the Survey Agency for clarification if needed.



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Common Pitfalls

Factors leading to rejection of POCs and AOCs



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Timing is Everything

Pitfalls:

- Using dates prior to the survey exit
- Setting dates that don't allow sufficient time to achieve compliance
- Not including a date for overall compliance



Timing can make or break the show! Ensure your dates align with a realistic schedule for success.

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*Every show needs a dedicated cast.
Clearly define who is responsible for each action.*

Accountability and Responsibility

Pitfalls:

- Relying on staff who contributed to the deficiency for corrective actions
- Not indicating who is responsible for training and reporting results to Quality Assurance
- Failing to assign who will complete audits and implement the corrective actions
- Not specifying titles in the POC (e.g., "The Administrator will...")

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Education and Inclusion

Pitfalls:

- Failing to specify who to educate (e.g., "all staff, all licensed nurses") or excluding agency staff
- Not providing details on in-service training: who conducts it, content, timing, and monitoring
- Not addressing duplicate deficiencies consistently



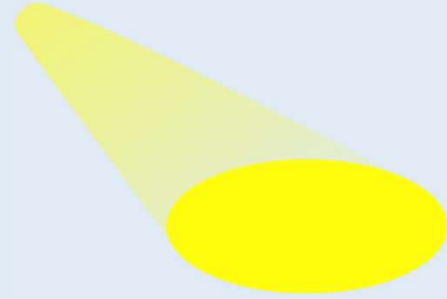
Education is a starring role! Include everyone necessary and outline every detail of your training plan!

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Attention to Detail

Pitfalls:

- Grammar and spelling mistakes
- Not indicating who will perform each task
- Using defensive language
- Including employment matters such as termination status



In the spotlight, every detail counts! Proofread thoroughly, avoid defensive language, and make sure your plan is polished.

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Quality Assurance and Data-Driven Decisions



Pitfalls:

- Ending QAPI audits on a hard stop instead of allowing data to guide
- Failing to investigate the root cause of deficient practices
- Not addressing how deficiencies affect others
- Not making systemic changes to prevent recurrence

Let data be your guide under the big top! Root cause analysis and ongoing audits are essential!

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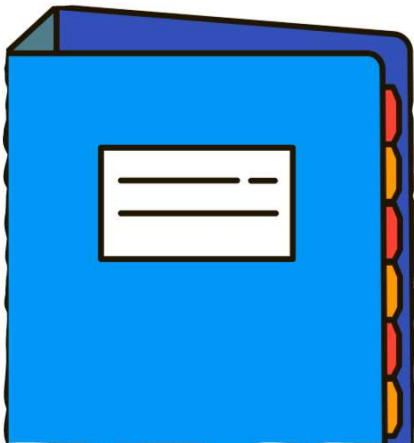
Tips

Strategies to Avoid Mistakes



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The Ringmaster's Handbook



Organize your POC/AOC for a successful performance.

Tip:

Place your POC/AOC in a "Big Top Binder," divided into sections to keep everything organized and accessible.

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The Tightrope Walk of Timely Action



Start drafting your POC right after the survey exit to maintain balance.

Tip: *Begin drafting immediately, balancing quick actions with thorough review once the SOD arrives.*

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Rallying the Troupe

Gather the team to review findings.

Tip:
Plan a team meeting to review findings, so everyone's ready for the show.



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The Daily Circus Rehearsal

Keep track of POC progress with morning meetings and daily accountability checks.

Tip:

Hold morning meetings and assign tasks to each “performer” to keep the show on track.



33

End-of-Day Curtain Call



Review daily tasks and ensure everything is in place.

Tip:

At the end of each day, review and file all completed tasks.

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Adjusting the Acts



If something isn't working,
adapt and improve!

Tip:

*If something isn't working,
take it back to QAPI for a
quick rewrite.*

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The Finale Countdown


Give enough time for the re-visit
and avoid rushing.

Tip:

*Choose a timeline that allows
for re-evaluation to avoid
rushing to the grand finale.*



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The Show Must Go On

Follow up with an encore and adapt to maintain compliance over time.


Tip:
Continue reviewing and adapting the POC to maintain a smooth performance.

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Key Takeaways from Today's Panel

Remember these show-stopping tips to master compliance!


Distinctions and Timing:
Clear understanding of differences and deadlines between POCs and AOCs.



Understanding the Survey Agency:
Insights on working effectively with the survey agency review processes.



Avoiding Pitfalls:
Awareness of common mistakes and how to proactively prevent them.



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The Ringmaster's Final Act: *Questions & Discussion*



CHALLENGES FACED
WITH CRAFTING POCs
AND AOCS



SOLUTIONS FOR
EFFECTIVE POC AND
AOC MANAGEMENT



Step right up! Share your thoughts and insights.

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2024 Annual Meeting
Session #3: Mastering Compliance: Crafting Effective Plans of
Correction and Allegations of Compliance
November 19, 2024



Scan this code with your phone to access the training's evaluation form!

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