AACK!!! I have to write what?!

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Acronyms and Definitions

- DPHHS = Department Health and Human Services
- 2567 = form used to list deficient practices identified by surveyors
- CMS = Centers for Medicare and Medicaid Services
- VA = Veterans Administration
- Working Days = Days that DPHHS would be in the office
- Calendar Days = 7 days a week
- POC = Plan of Correction

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Timing

- DPHHS has 10 working days to get 2567 to facility after date of exit
  - Exception is state owned facilities like EMVH
    - they have 10 working days to get 2567 to Regional CMS office in Denver, CO
- Facility has 10 calendar days to return POC to DPHHS or Regional CMS office upon receipt of 2567
- Facility has 45 Calendar days from date of exit to be in compliance
  - Exception State Owned facilities: Denver determines compliance date

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Timing cont'd

Let's practice:
- ❖ Exit: March 15
  - ❖ When should we expect 2567?
  - ❖ When would we need to return POC?
  - ❖ When is date of expected compliance?
- ❖ Exit: October 31
  - ❖ When should we expect 2567?
  - ❖ When would we need to return POC?
  - ❖ When is date of expected compliance?

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Reading the 2567

- Abbreviations, i.e.
  - "ARD -assessment reference date
  - MDS -minimum data set
  - TAR -treatment administration record"
- Deficient practices:
  - "tag" language
  - How the facility is NOT in compliance
  - List of evidence

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Reading the 2567 cont'd

- Tag language
  - 483.24(a)(b) ADLS DO NOT DECLINE UNLESS UNAVOIDABLE
    - Then all of the language from the SOM under this tag

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Reading the 2567 cont'd

- "This REQUIREMENT is not met as evidenced by:"
  – Based on observation, record review, and interview, the facility failed to prevent resident declines in ADL status related to eating during meals. This affected 2 (#s 1 and 3) out of 10 sampled residents.

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Reading the 2567 cont'd

- "Findings include:"
  – All evidence supporting why they are citing the deficient practice

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Plan of Correction Format

- 5 steps we must accomplish
  – See hand-out—Step 1 and 2
- Practice first 2 steps as small groups
  – Share responses
  – Real world
    - Delegate
    - All hands on deck

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POC Format cont'd

- Steps 3-5
  – Walk through
- Practice these 3 steps as small groups
  – Share responses
  – Real World
    - Policy review delegation/sharing
    - Education brainstorming of how to accomplish
    - QAA meetings and potential need to schedule "special" meeting

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Now what?

- POC transmitted to DPHHS via secure link
- Work the plan
  – DPHHS may request more information
    - Update POC
- Get steps 1-4 completed before compliance date

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Re-Visit

- Re-visit surveys
  – Fax
  – On-site

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Re-Visit cont'd

- What do we need:
  - Copies of all audits stated in POC
    - If care plans updated due to audits, copy of those care plans
  - Copies of all policies reviewed/updated
    - All new forms, logs going to be used
  - Copies of all education
    - Including sign-in sheets

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