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

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

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?

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

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
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.

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

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

Reading the 2567 cont’d

• “Findings include:”
  – All evidence supporting why they are citing the deficient practice

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

Re-Visit

• Re-visit surveys
  – Fax
  – On-site
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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