

Aging And Long-Term Support Administration
RESIDENTIAL CARE SERVICES
“Transforming Lives”

CHAPTER 27 – PRINCIPLES OF DOCUMENTATION

OVERVIEW

Prior to 1995, Residential Care Services was known as Nursing Home Quality Assurance and was responsible for the licensing and certification of Nursing Homes, under the direction of the Health Care Finance Administration (HCFA). RCS had been regulating Intermediate Care Facilities for Individuals with Intellectual Disabilities (ICF/IID) during that time as well, acquiring that program in approximately 1994. In 1995, RCS acquired the first state governed program with the responsibility and oversight for licensing Adult Family Homes (AFH) and the division was renamed Residential Care Services (RCS). RCS further acquired the responsibility and oversight of licensing boarding homes, now known as Assisted Living Facilities (ALF) in 1998, resulting in a review of the division’s organization, processes, and structure. A reorganization in 2000 was designed to transform RCS’s processes and structure to enable a more efficient use of resources, and to provide greater consistency in values, practices, and perspectives for RCS staff, providers, and residents across all of the programs.

As part of this transformation, the Training and Education Transition Team (TETT) was formed focusing on the training unit, types of training, curriculum, and methods for conducting regulatory work. By the fall of 2002, and in response to further recommendations by the TETT, representatives within RCS continued to develop tools and processes contained in the Operational Principles and Procedures (OPP), now known as Standard Operating Procedures (SOP).

HCFA was renamed as the Centers for Medicare and Medicaid Services (CMS) in 2001. CMS created the Principles of Documentation (POD) of Statement of Deficiencies (SOD) CMS 2567 guidelines (also known as Appendix A) in May 2004. In August of 2004, RCS created a resource manual, similar to the CMS POD, for the community programs that provided guidance on documentation of deficiencies. It was also at that time RCS developed the Quality Assurance Auditing Tool to assist RCS staff in reviewing deficiency citations for accuracy.

In 2004, RCS assumed responsibility of the certification and regulatory oversight for Certified Community Residential Services and Supports (CCRSS) programs from the Developmental Disabilities Administration as a result of a merger between the Division of the Developmental Disabilities and Aging and Disability Services Administration. In 2005, the Washington State Legislature authorized the Department of Social and Health Services (DSHS) to develop Enhanced Services Facilities (ESF) as a new category of licensed residential care facilities.



In total, RCS regulates six residential/facility/provider type settings using a standard approach to documenting deficient practice.

Since the development of both the federal and community programs POD Manuals, revisions have been implemented on several occasions. In 2019, RCS leadership decided to combine the federal and community POD manuals for consistency across all RCS setting types.

SUBJECT MATTER EXPERT

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27A-1 STANDARD OPERATING PROCEDURES

BACKGROUND

Regulatory staff use their knowledge, skills, and abilities to gather all information necessary to determine if an entity meets minimum regulatory requirements. The information gathered is written in a format of a deficiency citation(s), which are referred to as Statement of Deficiencies (SOD). For statewide and division consistency, the Principles of Documentation (POD) are guidelines used for writing SODs for all RCS regulatory programs.

The SOD is an official record and legal document used as a formal method of communicating detailed information about deficiencies to the entity. The SOD informs the entity of the pertinent investigative findings, the analysis of deficiencies, and informs the entity of what needs to be corrected. The entity uses the SOD to develop a plan of correction for the identified deficient practice. Use of a clear, concise, and organized SOD results in effective communication with the entity.

The regulatory process is designed to ensure the entity providing services and supports to vulnerable adults is in compliance with their specific state and federal statutes, rules, and regulations. This process, including interviews, observations, and record review, is an important part of subsequent legal proceedings. The SOD must include factual, accurate, and objective information to adequately support resulting enforcement action(s) and defend that action on appeal, judicial review, or informal dispute resolution. The primary evidence for enforcement action(s) is the SOD, along with supporting documentation, working papers, and photos that support the determination of non-compliance with regulatory requirements.

The Deficiency Citation Analysis Tool (DCAT) is a quality assurance analysis tool that assists in writing SODs. Use of the DCAT provides a quality assurance assessment of the documentation in the citation to ensure all of the following components of a deficiency citation are included:

- 1 Regulatory Reference Statement
- 2 Deficient Practice Statement
- 3 Findings

Effective use of the DCAT will provide regulatory staff and Field Managers the opportunity to ensure the POD guidelines are met.

PROCEDURE

The original writer of the citation(s) or the team will:

A. Write SODs according to the POD Manual following these eleven principles:

1. Entity Compliance and Noncompliance

2. Using Plain Language
 3. Components of a Deficiency Citation
 4. Relevance of Onsite Correction of Findings
 5. Interpretive Guidelines (NH and ICF/IID Only)
 6. Citation of State or Local Code Violations (NH and ICF/IID Only)
 7. Cross-References
 8. Conditions of Participation (COP) Deficiencies (ICF/IID Only)
 9. Citations with More Than One Regulatory Reference
 10. Components of a Consultation (AFH, ALF, ESF only)
 11. Recurring/Repeated, Uncorrected, and/or Previously Cited (ALF, AFH, and ESF only)
- B.** Consult the POD Manual for examples of the POD principles for all RCS regulated settings and services.
- C.** Read and edit each SOD to correct errors, improve clarity, and ensure precision of meaning by:
1. Reading aloud
 2. Checking spelling
 3. Using plain language
 4. Completing the Deficiency Citation Analysis Tool (DCAT)
- D.** When completing the SOD, ensure all required timelines are met as identified in the following SOPs:
1. Chapter 7, Enforcement
 2. Chapter 12, Adult Family Homes
 2. Chapter 13, Assisted Living Facilities
 3. Chapter 14, Certified Community Residential Services and Supports
 4. Chapter 15, Enhanced Services Facilities
 5. Chapter 16, Intermediate Care Facilities for Individuals with Intellectual Disabilities
 6. Chapter 17, Nursing Homes
- E.** When this process is complete, submit the SOD to the field manager.
- Field Managers will:**
- A. Use the DCAT as a guide to review SODs and CMS 2567 forms.

- B. Complete one DCAT per SOD and CMS 2567 form when staff did not apply the POD effectively.
- C. Discuss the completed DCAT with staff to improve SOD writing skills.
- D. Retain the completed DCAT for one year.

FIELD MANAGER RESPONSIBILITY

Field Managers will conduct the following activities in relation to this procedure:

- 1. Train new staff and ensure they are able to demonstrate they understand this procedure.
- 2. Conduct periodic reviews of this procedure to ensure staff are following it correctly.
- 3. Request training or clarification from headquarters staff as needed.

QUALITY ASSURANCE REVIEW

This procedure will be reviewed for accuracy and compliance at least every two years.

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APPENDIX A: Topic Resources and Forms

RESOURCES

1. [Principles of Documentation: A Manual for All Residential Care Services Programs](#) (March 2022)
2. [DSHS Branding Standards and Style Guide](#) (January 2019)
3. [Use of Pronouns in External Communications](#)

Forms

1. [Deficiency Citation Analysis Tool](#)

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APPENDIX B: CHANGE LOG

EFFECTIVE DATE	CHPT SECT #	WHAT CHANGED? BRIEF DESCRIPTION	REASON FOR CHANGE?	COMMUNICATION & TRAINING PLAN
3/2022	27A-1 Appendix A	Principle 11 was added Date on Principles of Documentation updated	Requested by field staff to clarify when to use repeated, recurring, and uncorrected terms	<ul style="list-style-type: none"> Management Bulletin issued R22-026
4/2021	Full Chapter	Revised for clarity and defined Field Manager procedures and responsibilities	Requested by Office Chiefs, Regional Administrators, and Field Managers	<ul style="list-style-type: none"> Management Bulletin issued R21-014 (amended)
2/2021	Full Chapter	New SOP Chapter	N/A	<ul style="list-style-type: none"> Management Bulletin issued R21-014

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