

Transforming
Lives

Plans of Correction

Residential Care Services & the Developmental Disabilities
Administration

What is a Plan of Correction?

- Residential Care Services conducts provider complaint and certification evaluations
- If a provider is found to be out of compliance with requirements in WAC, RCS issues the provider a Statement of Deficiency (**SOD**), which cites WACs not followed
- The provider must submit to RCS a plan describing how they will fix the problem - a **p**lan of **c**orrection (POC)
- The POC must be submitted to RCS within **10 calendar days** of receiving the SOD

What is required in a Plan of Correction?

- Each WAC cited requires **its own** POC addressing each of the four components outlined in WAC 388-101-3160

WAC 388-101-3160

Plan of correction.

The service provider must:

- 1) Submit a signed plan of correction to the department according to established department processes and timelines; and
- 2) **Include in the plan of correction:**
 - (a) **What** the service provider did or will do to correct each deficiency;
 - (b) **How** the service provider will prevent future problems of this type;
 - (c) **Who** will be responsible for monitoring the corrections to ensure the problems do not recur; and
 - (d) **When** lasting correction will be achieved.

Let's break it down ...

1) What the service provider did or will do to correct the deficiency:

- Describe what you did to **immediately** remedy the issue cited in the SOD.
- Include initial actions taken to ensure the health and safety of the clients who were the subject of the citation.

Let's break it down ...

2) How the service provider will prevent future problems of this type:

- Describe the system or operational changes you will put in place to ensure this does not happen again to any client.
- How will you review/apply needed changes to all clients or households?

Let's break it down ...

3) Who will be responsible for monitoring the corrections so they do not recur?

- List the name(s) and/or title(s) of the person responsible to implement the change.
- Who will be responsible for oversight to ensure the corrections ~~within the system~~ are made and sustained over a period of time to maintain compliance?
- Where possible, a second person should be responsible for ongoing oversight.

Let's break it down ...

4) When lasting correction will be achieved:

- List the exact date you expect the lasting correction (including system to prevent future problems) to be complete
- All corrections must be made within 45 days of the SOD date

POC Template

- Did you know you can use an optional [POC template](#)?
- Find it online on the DDA [Provider Resources page](#)
- The template includes the four required elements from WAC

Plan of Correction

Agency Name	Citation Date
Submitted by	Date of POC Submission
<input type="checkbox"/> Complaint Citation <input type="checkbox"/> Certification Citation	

Citation: (list WAC)	
What <i>initial or immediate actions</i> were taken to address concerns affecting clients?	Describe the <i>initial or immediate actions</i> taken to achieve compliance in the area subject to the complaint/certification citation. This should include initial actions taken to ensure the health and safety of the clients who were the subject of the citation.
How will you apply the correction to all clients you support?	System or Operational Changes: How will you review/apply needed changes to all clients or <u>households</u> .
Who will be responsible to implement change and monitor the corrections to ensure the problems do not reoccur?	List the name(s) and/or title(s) of the person who will be responsible to implement the change and who will be responsible to ensure ongoing compliance with this change? Where possible, a second person should be responsible for ongoing oversight?
Date by which lasting correction will be achieved	Enter the date when you expect the lasting correction (including system to prevent future problems) to be complete. This must be within 45 days of the citation. Click here to enter a date.
Additional Information	Enter any additional information you believe is pertinent such as intent to submit an IDR

Additional Information

You can add reasoning or a short explanation to the POC, but do not use this to talk about why the citation is unjust, unwarranted, etc. This information is ~~not needed in your POC!~~ unnecessary.

~~Remember~~ Your words in a POC will be part of public record on the online locator. Unprofessional, passive-aggressive verbiage or any other language used is a reflection of *you* as a provider.

Common Reasons Why POCs Are Not Accepted

- POC does not address each component identified in the WAC
- POC only describes what has been fixed for the client(s) identified in the SOD. This is correct, but what is being done to prevent recurrence with any client?
- POC does not speak to or address the system in place to prevent recurrence. The department is interested in preventing this issue from happening to any client, current or future.
- POC does not address who will be responsible for ensuring corrects are made. Who will have oversight over your system to ensure you are in compliance?
- Date of correction is not within 45 days of SOD completion. Administrators and designees are notified by the Investigator of the findings are. Do not wait until you get to receive the SOD to begin making corrections.

What if you **do not** agree with the finding?

You must complete a **POC**, but can request an Informal Dispute Resolution (IDR)

To request an IDR:

- 1) Write your POC as though the SOD will not change (it might not, dependent upon the results of the IDR)
- 2) Submit a request within 10 working days to **the** RCS IDR Program Manager that includes what specific deficiency ~~or deficiencies~~ you disagree with; why you disagree ~~with each deficiency~~, and whether you want the IDR to occur in-person, by telephone or as a paper review. **This is a separate request from the POC.**

Tips for POCs

- If you have reviewed files as part of your correction, do a full review to ensure 100% compliance
- Your corrections should include looking at your current clients and system to ensure other non-sampled clients do not have the same issues which would result in further non-compliance with the WAC
- If you have retrained staff, retrain all staff involved and keep a training roster
- If you have implemented a protocol, have it documented and train staff on it
- Include language that speaks to the systems, protocol, process **and** methods you have implemented to ~~ensure all non-compliance issues have been immediately resolved~~ to prevent repeat occurrences

Tips

- Include the actual people doing the work as part of the plan to correct the issue(s). **Help** them to understand the importance of ensuring compliance, ~~and~~ what they need to do and why their actions help create a successful system for the clients.
- Explain your system **exists** to help the department understand the process, what to expect, and what to look for when trying to understand what is in place to ensure long-term sustainability.
- Consider **quality assurance** within your own POC by your agency over a period of time to ensure it is sustainable and workable; and the plan is being implemented as intended. Your own QA provides valuable insight into root cause analysis and any changes that can be made to further **IMPROVE** your system in place.

Check the mail!

- SODs are typically mailed via USPS **certified mail** to the address on file
- Ensure any changes in addresses are reported immediately to the department using the [Change Request Form](#) so mailing addresses or any pertinent changes are updated in the department's database where SODs are produced and tracked
- Communicate with your staff that when certified mail is waiting at the post office for pick-up, the longer it waits to be picked up, the shorter the time frame (45 days from the date of the SOD) to get corrections completed to meet department deadlines for POCs

Need help with the POC or understanding the citation?

- 1) Reach out to RCS; let Nicole Vreeland know right away if you need assistance.
- 2) DDA Residential Program Specialists can help. They are able to **assist** with POCs, technical assistance, etc.
 - Region 1 - William Morris, 509-329-2856, William.Morris@dshs.wa.gov
 - Region 2 – Todd Wilday, 206-568-5657, Todd.Wilday@dshs.wa.gov
 - Region 3 – Mikal Applewhite, 253-404-5548, Mikal.Applewhite@dshs.wa.gov

Where do I send the POC?

POCs must be submitted within 10 calendar days of the provider receiving the citation/statement of deficiency

Save a stamp – email or fax in your POC

[Nicole Vreeland](#), Field Manager

Residential Care Services

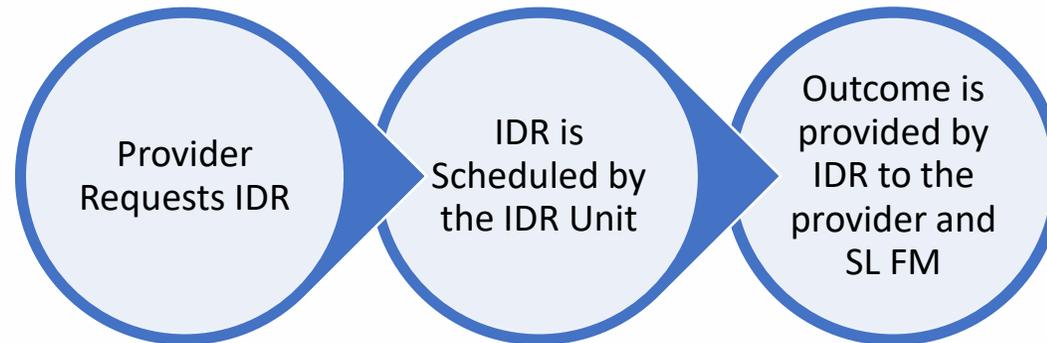
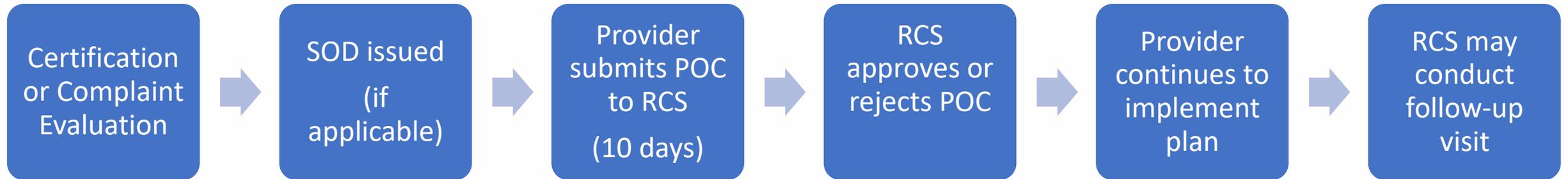
PO Box 45600

Olympia, WA 98504-5600

Fax: (360) 725-3208

Send copy to DDA Resource Manager or
Residential Program Specialist for your region

In review...





Questions?

Thank you!

Nicole Vreeland, MS, LMHC, NCC

Field Manager

Aging & Long-Term Support Administration

Lori Gianetto Bare

Residential Quality Assurance Unit Manager

Developmental Disabilities Administration

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