

Writing your Plan of Correction (POC)

You are required to write a plan of correction (POC) when you receive a statement of deficiencies (SOD) on form CMS-2567. Your POC must clearly state how the deficient practice will be corrected or has been corrected. Address the following four points of Evidence of Correction for each deficiency:

- 1. Documentation showing the corrective action taken for patients found to have been affected by the deficient practice. Laboratory should state:
 - a. How the lab determined impact (negative or no effect) on patient test results.
 - b. If patient test results were negatively affected by the cited deficiency, what corrective measures have been taken.
- 2. Document how the laboratory has identified other patients with the potential to be affected by the same deficient practice and what corrective action has been taken. Laboratory should state:
 - a. How the lab determined if other patient test results were affected by the cited deficiency.
 - b. If the deficiency existed beyond the scope of the evidence, were patient test results affected and what corrective actions have or will be taken.
- 3. Document what measures have been put into place or what systemic changes have been made to ensure that the deficient practice does not reoccur. Laboratory should state:
 - a. What remedial measures have been or will be instituted to prevent reoccurrences.
- **4.** Document how the corrective action is monitored to ensure the deficient practice does not reoccur. Laboratory should state:
 - a. What kind of monitoring process will check the corrective action to ensure the deficient practice does not reoccur. Include the person responsible for monitoring and at what frequency.

Failure to address all four points of the Evidence of Correction will result in an unacceptable (failed) POC. Submit your POC within 10 working days from receipt of the SOD.

Additional reminders to be sure that the POC will be acceptable:

- Address each deficiency.
- Please write legibly or type the response if your handwriting is difficult to read.
- Each part of a cited deficiency must be completely addressed. One D-tag may have several deficiencies, address each issue separately.
- Each D-tag must show a date of correction or expected correction. The time-frame for correction must be reasonable and appropriate. All "immediate jeopardy" condition level deficiencies must be corrected within 23 days; "non-immediate jeopardy" conditions within 45 days of the date of survey.
- Identify who will be responsible for implementing the POC.
- The director or administrator must sign and date the POC at the bottom of page one.
- Proof of correction of each deficiency may be requested in approximately 90 days from the date of survey. If deficiencies have already been corrected, include documentation to prove the appropriate changes have been made, and submit with your POC.