

Audit Lead to Populate Column A PO may add additional rows if needed for multiple root causes	Please describe the cause(s) that led to the non-compliance. If more than one root cause exists for an issue in Column A, please enter each root cause in a new row by inserting an additional rows.	Please identify the specific actions that will be taken to remediate any impacted participants, if remediation is possible.
<i>Example: Wound care was not provided as ordered by the PCP.</i>	<i>The PCP incorrectly entered wound care orders into the EMR.</i>	<i>Provider EMR review of all participants receiving wound care to ensure orders are current and aligned with PCP plan of care.</i>
<i>Example : Wound care was not provided as ordered by the PCP.</i>	<i>PO was under the impression that wound care could be ordered by RNs.</i>	<i>Provider EMR review of all participants receiving wound care to ensure orders are current and aligned with PCP plan of care.</i>

What specific actions will be taken to address each cause and prevent future non-compliance.	Please identify the staff responsible for the implementation of the corrective action plan. If multiple actions/changes will be implemented, please identify the staff responsible for implementing each action/change.	Please identify the specific, objective, and measurable monitoring activities the PO will undertake to evaluate the effectiveness of the changes implemented to prevent future non-compliance. If multiple monitoring activities will be implemented, please identify each monitoring activity.
Provider EMR Training	Medical Director	Every two weeks, Medical director will review 5 differing participant charts undergoing wound care to ensure PCP orders are correctly entered.
1) RN Scope training 2) Wound care policy updates to include all wound care orders will require PCP order or co-signature prior to being executed by nursing staff. 3) Policy update indicating verbal orders will not be utilized.	1) Nursing Director 2) Nursing Director, Quality Director 3) Nursing Director, Medical Director	Every two weeks, Nursing Director will review 5 differing participant charts undergoing wound care to ensure nurses are effectuating PCP orders as written.

Please identify the staff responsible for monitoring and evaluating the effectiveness of the CAP. If multiple actions/changes will be implemented, please identify the staff responsible for monitoring each action/change.	Please describe how the CAP will be integrated into the PO's compliance program in order to ensure compliance with CMS requirements. If multiple actions/changes will be implemented, please describe how each action/change will be integrated into the PO's compliance program.
Quality Director, Executive Director	Results will be collected, aggregated and analyzed and maintained in ongoing quality review. Results will be reported in monthly quality meeting and quarterly calls with BOD.
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