



Documentation of Corrective Action Plan (CAP) for Allegations of Abuse/Neglect

Training for OMH Licensed Providers

Learning Objectives

At the conclusion of this training, participants will have the knowledge and skills to:

- Develop a Corrective Action Plan (CAP) for Allegations of Abuse/Neglect that will meet the NYS Justice Center (JC) and OMH requirements.
- Utilize NIMRS to Correctly Document a CAP
- Understand the timeframes associated with starting and completing a CAP.

Corrective Action Plans

- The purpose of a CAP is to correct any identified deficiencies or issues raised, therefore reducing the probability of recurrence. A good CAP will include:

Corrective action that directly correlates with identified issues

Clearly defined opportunities for improvement

Measurable goals and actions

Reasonable implementation dates

The specific person(s) responsible for each action

Step #1 Documenting in NIMRS

- A CAP will be need to be placed in NIMRS for:
 - Substantiated Allegations of Abuse or Neglect OR
 - Unsubstantiated Allegations of Abuse or Neglect that reveal “issues raised” requiring corrective action.

Seclusion ement	Maintenance	Med Event Management	Tools	Help	Log Off
< Back	Next >	Save	New Incident	Email OMH	Close Incident
Incident	Client	Initial Findings	Notification	Follow-Up	
Follow-Up Details I	Follow-Up Details II				
Follow-Up Details I					
Print					
JC Incident (Abuse and Neglect)			JC Incident ID: 101-4541989		
Incident # 2403891			Incident Status Reported To CO		
Special Investigation	<input checked="" type="radio"/> Yes <input type="radio"/> No		Root Cause Analysis (For Sentinel Events*)	<input type="radio"/> Yes <input checked="" type="radio"/> No	
	*For TJC accredited facilities only				
Start Date	04/01/2014				
End Date	04/08/2014				
Allegation Status	Substantiated (proven true) ▼		Contributing Factor	Action Of Employee ▼	
Others Involved	▼		IRC Review Date	04/14/2014	
Others Narrative	<input type="text"/>				
Incident-Final Classification	Allegation of Abuse or Neglect ▼		Incident Sub Type	Physical abuse ▼	
Findings/Conclusions					
<input type="text"/>					

Step #1 cont: Follow Up Details I

Management & Seclusion | Maintenance | Med Event Management | Tools | Help | Log Off

< Back	Next >	Save	New Incident	Email OMH	Close Incident	
Incident	Client	Initial Findings	Notification	Follow-Up		
Follow-Up Details I	Follow-Up Details II	Follow-Up Details I			Print	
JC Incident (Abuse and Neglect)		JC Incident ID: 101-4541989				
Incident #	2403891	Incident Status	Reported To CO			
Special Investigation	<input checked="" type="radio"/> Yes <input type="radio"/> No	Root Cause Analysis (For Sentinel Events*)	<input type="radio"/> Yes <input checked="" type="radio"/> No	*For TJC accredited facilities only		
Start Date	04/01/2014	End Date	04/08/2014			
Allegation Status	Substantiated (proven true)	Contributing Factor	Action Of Employee			
Others Involved		IRC Review Date	04/14/2014			
Others Narrative						
Incident-Final Classification	Allegation of Abuse or Neglect	Incident Sub Type	Physical abuse			
Findings/Conclusions						
See investigation.{USER:'coqamas-rs' DATE : '07/17/2014 01:05:14 PM'}						
Help	Reported to OMH			< Back	Next >	Save

Step #1 Cont: Follow Up Details II

Paint & Seclusion Management	Maintenance	Med Event Management	Tools	Help	Log Off
< Back	Save	New Incident	Email OMH	Close Incident	
Incident	Client	Initial Findings	Notification	Follow-Up	
Follow-Up Details I	Follow-Up Details II				
Follow-Up Details II					<u>Print</u>
JC Incident (Abuse and Neglect)		JC Incident ID: 101-4541989			
Incident #	2403891	Incident Status	Reported To CO		
Investigator	J. Smith				
Employee(s) Named In Allegation	G,Harris Other				Edit
Recommendation Type	Recommendation Desc	Target Date	Implementation Status	Implementation Date	
Employee Counseling/Reprimand	Employee G. Harris will be counse...	04/09/2014	Fully Implemented	04/14/2014	
New Equipment	Each unit will be given 6 recharga...	04/08/2014	Fully Implemented	04/11/2014	
<input type="button" value="Add Recommendation"/> <input type="button" value="No Recommendation"/>					
Incident Review Committee Findings					
<p>This allegation and subsequent investigation was reviewed during IRC meeting on 4/15/2014.....{USER:'coqamas-rs' DATE : '07/17/2014 01:11:30 PM'}</p>					
<u>Help</u>		Reported to OMH		< Back	Next >
<u>Save</u>					

Step #2- Receipt of “Notice to Provider of Investigation Determination” Letter from the Justice Center

When you receive the letter (aka Determination Letter):

- Review for accuracy in regards to subject name, date of incident, etc.
- Identify substantiated or unsubstantiated status
- Identify Category classification (1 -4)
- Note any Justice Center recommendations
- Note the date of the letter – CAP is due 90 days after

Notification from OMH

- Upon receipt of the Determination Letter, OMH Central Office will send you a notification email that will include:
 - CAP Due Date (90 days from date of letter)
 - OMH Central Office contact information for any questions
 - OMH Corrective Action Plan E-form – attachment (to be reviewed later in training)
 - The Justice Center Determination Letter - attachment

Step #2 cont – JC Recommendations for Corrective Action

- You are not required to incorporate the JC's recommendations into your CAP.
- If the JC recommends something that was not included in your original CAP and you decide to use their recommendation you would document this in NIMRS:

Recommendation Type	Recommendation Desc	Target Date	Implementation Status	Implementation Date
Employee Counseling/Reprimand	(JC) Employee G. Harris will be co...	04/09/2014	Fully Implemented	04/14/2014
New Equipment	Each unit will be given 6 recharga...	04/08/2014	Fully Implemented	04/11/2014

Step #3 – Close Report in NIMRS

- Upon completion of the documentation of corrective action recommendations, close the report in NIMRS.
- For those corrective action recommendations that are pending implementation, use the IRC meeting date in the Implementation Date column so NIMRS will allow you to close the report.

Recommendation Type	Recommendation Desc	Target Date	Implementation Status	Implementation Date
Employee Counseling/Reprimand	(JC) Employee G. Harris will be co...	04/09/2014	Fully Implemented	04/14/2014
New Equipment	Each unit will be given 6 recharga...	04/08/2014	Fully Implemented	04/11/2014

Step #3 – Close Report in NIMRS

- If, after receipt of the JC Determination Letter, you decide to implement a JC recommendation, you will need to re-open the NIMRS report and add this information in the Follow Up Details I and II sections.
- You will re-close the report after the JC recommendation has been implemented.

Step #4 – Communicating CAP Information to OMH Central Office

OMH CORRECTIVE ACTION PLAN
This form includes information that the NYS Justice Center requires in order to close out a Corrective Action Plan in their system. Please complete this form and e-mail to OMH at CAPSREVIEW@OMH.NY.GOV

INCIDENT DEMOGRAPHICS

INCIDENT SERIAL NUMBER	<input style="width: 90%;" type="text"/>	CASE SERIAL NUMBER	<input style="width: 90%;" type="text"/>
PROVIDER	<input style="width: 90%;" type="text"/>	NMBS ID NUMBER	<input style="width: 90%;" type="text"/>

Primary Areas of Deficiency Noted in Investigation and CAP Addresses:

- Program/Services:** Action (s) recommended to establish additional services or treatment and/or to improve services to meet individual receiving services/needs wishes. Action (s) recommended to meet standards set by treatment/service plan, regulations and/or facility policies.
- Compliance:** Actions (s) recommended to implement or improve policy/procedure in order to meet regulatory requirements.
- Systemic Ongoing Deficiencies:** To be selected for all incidents substantiated as Category 4 for which the JC has required a corrective action plan. The determination of Category 4 indicates systemic issues (in areas such as management, staffing, training, or supervision) or that the perpetrator of the abuse/neglect cannot be identified.
- QA/I:** Actions recommended to improve the agencies incident management practices. This may include internal and/or external reporting, investigation procedures or reports and/or incident review activities.
- Safety:** Actions recommended to make corrections to meet basic needs such as clothing, food, shelter, protection of individuals' rights guaranteed by law/regulation.
- Personnel:** Action(s) recommended to implement or improve administrative oversight of staff supervision, staffing patterns, and/or staff training to meet regulatory requirements and facility policies, and Awareness Training Feedback Process (state operations only).
- Physical Plant:** Correction of identified physical/environmental issue(s) for improvement of sanitation and/or safety issues including (but not limited to) fire safety risks recommended.

Corrective Actions Taken	<input type="checkbox"/> Training/Re-training <input type="checkbox"/> Staffing <input type="checkbox"/> Administrative <input type="checkbox"/> Financial Restitution <input type="checkbox"/> Risk self-review/QI <input type="checkbox"/> System/Program <input type="checkbox"/> Supervisory Oversight Changes <input type="checkbox"/> Environmental Changes/Managements <input type="checkbox"/> Incident Management Changes <input type="checkbox"/> Referral to Law Enforcement <input type="checkbox"/> Fine	<input type="checkbox"/> Policy and Procedure Creation or Revision Discipline <input type="checkbox"/> Governance <input type="checkbox"/> Infrastructure <input type="checkbox"/> Revised or New QA System <input type="checkbox"/> CAP Treatment Plan Revision <input type="checkbox"/> Fire Safety Improvements <input type="checkbox"/> Medical or Healthcare Changes <input type="checkbox"/> Investigation Improvements <input type="checkbox"/> Staff Termination
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NO CORRECTIVE ACTION PLAN REQUIRED

The Justice Center requires certain data be entered into their system to formally close a CAP. This form captures all the necessary data requirements.

OMH inputs this information into the JC's system.

OMH CAP E-Form: Areas Of Deficiency Definitions

- **Program/Services:** Action (s) recommended to establish additional services or treatment and/or to improve services to meet an individual receiving services needs/wishes. Action (s) recommended to meet standards set by treatment/service plan, regulations and/or facility policies.
- **Compliance:** Actions (s) recommended to implement or improve policy/procedure in order to meet regulatory requirements.
- **Systemic Ongoing Deficiencies:** To be selected for all incidents substantiated as Category 4 for which the JC has required a corrective action plan. The determination of Category 4 indicates systemic issues (in areas such as management, staffing, training, or supervision) or that the perpetrator of the abuse/neglect cannot be identified.

OMH CAP E-Form: Areas of Deficiency Definitions cont:

- **QAI:** Actions recommended to improve the agency's incident management practices. This may include internal and/or external reporting, investigation procedures or reports and/or incident review activities.
- **Safety:** Actions recommended to make corrections to meet basic needs such as clothing, food, shelter, protection of individuals rights guaranteed by law/regulation.
- **Personnel:** Action(s) recommended to implement or improve administrative oversight of staff supervision, staffing patterns, and/or staff training to meet regulatory requirements and facility policies, and Awareness Training Feedback Process (state operations only).
- **Physical Plant:** Correction of identified physical/environmental issue(s) for improvement of sanitation and/or safety issues including (but not limited to) fire safety risks.

Step #4 – Communicating CAP Information to OMH Central Office

Email OMH Corrective Action Plan E-Form to:

capsreview@omh.ny.gov

OMH Central Office CAP Unit will review the NIMRS information and contact providers with any questions or CAP modification recommendations before closing the CAP with the Justice Center.

JC Led Investigations

Corrective Action

To Ensure Safety

How to address identified needs if instructed to stop investigation by the JC.

CAP Development – JC Investigative Report