HealthCap
RISK MANAGEMENT SERVICES

Past Non-Compliance

From identification to documented correction

THE THREE REQUIRED CRITERIA

All three must be supported by evidence for the specific regulatory requirement (F-tag or K-tag).

1. **Non-compliance occurred**
   The community was not in compliance with the applicable regulatory requirement when the situation occurred.

2. **The event falls within the survey window**
   It occurred after the exit date of the last standard (recertification) survey and before the current survey.

3. **Correction was completed before the current survey**
   Evidence demonstrates correction and substantial compliance with that requirement at the time of the current survey.

PNC DECISION PATH

IDENTIFY
What happened?
Identify the specific deficient practice and regulatory requirement.

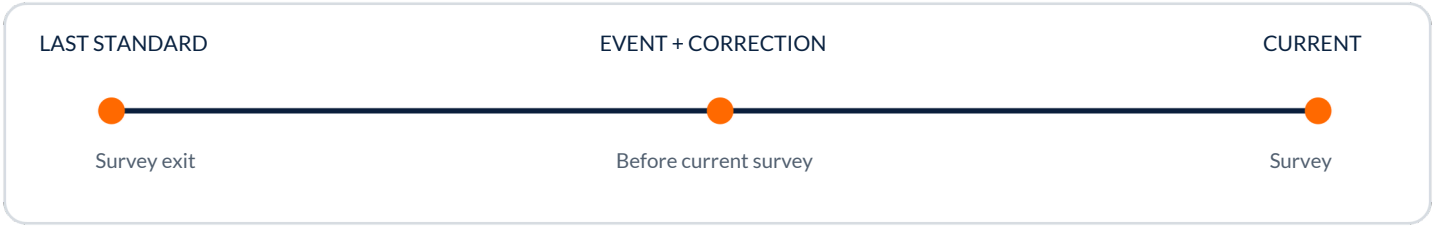
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CORRECT
What changed?
Address affected residents, systemic causes and other residents at risk.

>

VERIFY
Did it last?
Document completed actions, audits and sustained compliance.

TIMING MATTERS



IMPORTANT | Meeting the three criteria does not by itself determine citation or enforcement treatment. Review applicable CMS guidance and survey findings.

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Corrective Action Checklist

Use with the community's investigation, QAPI process and supporting records.

Event/Concern: _____

Regulatory tag (if applicable) _____

01 ADDRESS AFFECTED RESIDENTS

- [ ] Assess the affected resident(s) and document findings.
- [ ] Complete required notifications and update the care plan as indicated.

02 ASSESS BROADER EXPOSURE

- [ ] Identify other residents who may be affected or at risk.
- [ ] Audit related practices, near misses and comparable situations.

03 CORRECT THE SYSTEM

- [ ] Identify root cause(s), not just the immediate error.
- [ ] Implement system changes and staff education/competency measures.
- [ ] Document actions completed and their completion dates.

04 MONITOR AND VALIDATE

- [ ] Define what will be audited and the method used.
- [ ] Set a realistic frequency, duration and responsible position.
- [ ] Report results to QAPI; revise ineffective interventions.

MONITORING PLAN

Measure / audit: _____

Frequency + duration: _____

Responsible position: _____

Results reviewed by QAPI: _____

BEFORE THE NEXT SURVEY

Retain evidence of the event, corrective actions, completed monitoring and QAPI follow-up. Be prepared to explain what changed and how effectiveness was evaluated.