

PATHWAYS CMH

POLICY TITLE: Corrective Action Plans	CATEGORY: Compliance	
EFFECTIVE DATE: 06/05/14	BOARD APPROVAL DATE: 06/04/14	
REVIEWED DATE: 04/07/17	REVISION(S) TO POLICY STATEMENT: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	OTHER REVISION(S): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
RESPONSIBLE PARTY: Compliance Manager	CEO APPROVAL: Mary Swift, CEO	

APPLIES TO:

Pathways Personnel
Contract Providers

POLICY:

Corrective action shall be imposed as a means of facilitating the overall Pathways Compliance Plan goal of full compliance. Corrective action plans should assist Pathways' staff and Contract Providers to understand specific issues and reduce the likelihood of future noncompliance. Corrective action, however, shall be sufficient to address the particular instance of noncompliance and should reflect the severity of the noncompliance.

PURPOSE:

The purpose of this policy is to articulate Pathways commitment to adherence to standards contained and/or referenced in its Compliance Plan regarding Corrective Action plans.

DEFINITIONS

N/A

REFERENCES:

- Pathways Compliance Plan and Policies
- NorthCare Compliance Plan and Policies

HISTORY:

REVISION DATE: 04/08/15; 04/07/17

CEO APPROVAL DATE: 06/13/14; 04/08/15; 04/12/17

BOARD APPROVAL DATE: 06/04/14

PROCEDURES:

1. Basis for Corrective Action

Monitoring and auditing activities, failure to meet contract and/or performance standards, and reports of questionable practices may form the basis for imposing corrective action.

2. Elements of a Corrective Action Plan

As appropriate given the nature of the noncompliance, a corrective action plan shall include:

- a. A resolution for specific problems identified;
 - b. A recommendation to repay or not bill inappropriate claims or reverse encounters or not report encounters;
 - c. Report to appropriate government authorities about the non-compliance as appropriate;
 - d. A recommendation to change policy, procedures or business practices to remediate or reduce the likelihood of recurrence and to monitor the adoption of an compliance with the recommendations;
 - e. Additional mandatory education and training for staff who are the subject of the corrective action;
 - f. Identification of responsible party/parties for the corrective action and target date for completion; and
 - g. Other corrective measures as required.
3. Pathways Compliance / Risk Management Team and/or Pathways QI Leadership Team, depending on the situation, are responsible to review and accept corrective action plans or request further action or clarifications. Corrective Action Plans will be monitored at least annually at time of provider reviews.
4. Ramifications for failure to implement corrective action are outlined in Pathways Personnel Policies/Procedures, Pathways Sanction Policy, and contract language.