



**HealthTeam Advantage
Managed Care Compliance Conference
Preparing Effective Corrective Action Plans: Get to the Root!
February 2, 2021**

Care N' Care Insurance Company of North Carolina, Inc.

1

Introductions



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2

CMS Requirements

- ❖ CMS requires sponsors to conduct inquiries into any compliance incident or issue involving potential Medicare program noncompliance or potential fraud, waste and abuse. (See: 42 C.F.R. §§ 422.503(b)(4)(vi)(G), 423.504(b)(4)(vi)(G))
- ❖ Effective Corrective Action Plans (CAP) must be developed when issues or undesirable outcomes are identified.
- ❖ CAPs must include a Root Cause Analysis (RCA), and an Impact Analysis (IA).

Poll - Test Your Knowledge

Why is a Root Cause Analysis the first step and why is it important?

1. The RCA is not necessary. It is a good thing to do from time to time and is only required during a CMS Program Audit.
2. The RCA helps to address senior management, customer service, or other inquiries that may arise.
3. The RCA identifies breakdowns and gaps in processes, potential system errors, and helps to determine impacts and actions to resolve and prevent a recurrence.

The Minimum

For each undesired issue, sponsors should prepare a written document that provides details of:

- ❖ Specific facts
- ❖ Rationales
- ❖ Decisions
- ❖ Describe how compliance issues are investigated and resolved
- ❖ Chronological order



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5

The Minimum, Cont.

Supporting Documentation

- ❖ Policies and procedures (P&Ps)
- ❖ Evidence
- ❖ Training
- ❖ Root Cause Analysis
- ❖ Impact Analysis
- ❖ Corrective Action Plan

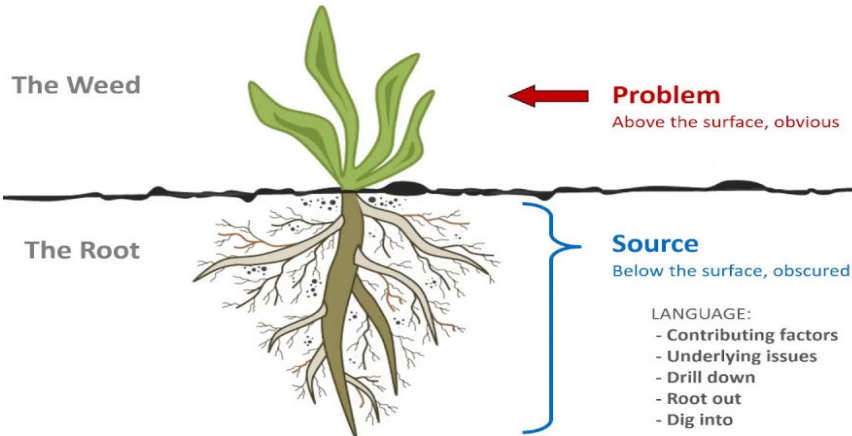


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6

Root Cause Analysis – Get to the Root or Roots

Root Cause Analysis - The Concept



7

1st - Conduct and Document the RCA

What is the root cause(s) that led to the undesired outcome?

- ❖ Identify
- ❖ Investigate
- ❖ Analyze
- ❖ Why

8

Shall We Chat

- ❖ Does every issue need an RCA?
- ❖ Can there be more than one Root Cause for an issue?
- ❖ Is a formal documented RCA needed or are emails and notes sufficient?

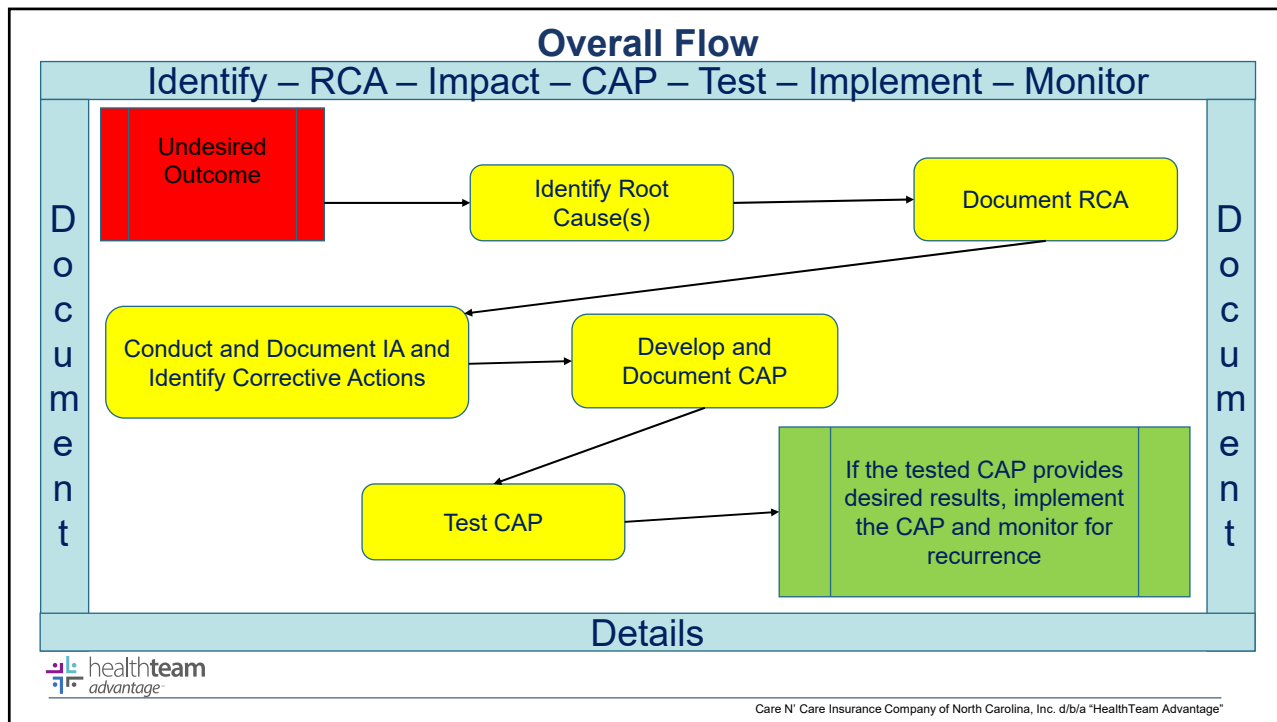
2nd – Determine Impact and Develop a CAP

What were the impacts and what corrective actions should be taken?

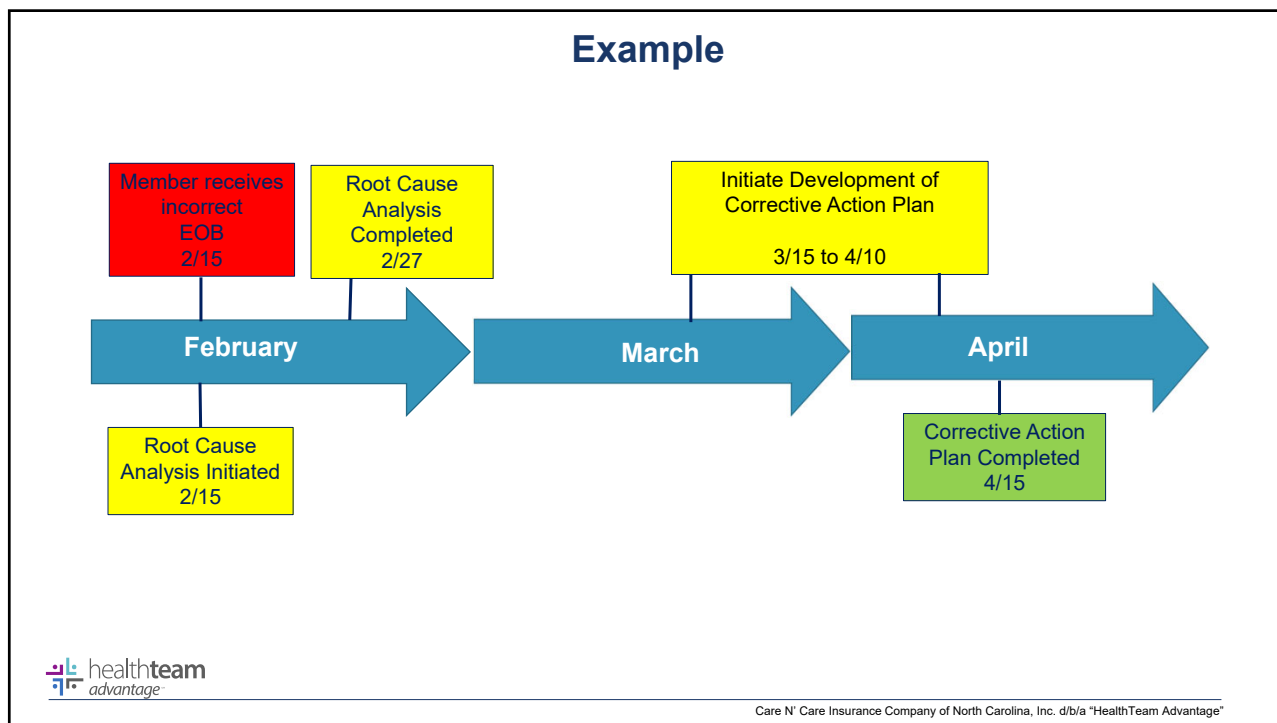
Impact Example

Due to the plan's print vendor's system malfunction, a batch mailing of 25 required notification letters were mailed to 25 incorrect members. The information disclosed included: member's name, ID #, address, and date of birth. A review of the system log revealed that a total of 25 members were impacted.

- ❖ Corrective Action Plan



11



12

Scenario

Can you identify the Root Cause(s)?

On July 4th, a health fair was held in Florida, and free cholesterol screenings were offered by a local doctor's office. All blood samples were mailed in envelopes provided by the contracted lab's administrative office in California.

The samples were to be tested in a lab in New York. A copy of the results were to be sent to the doctor and the patient within 7 to 14 business days.

On August 8th, a patient called to inquire about her results. The doctor's office placed a call to the lab in New York and was advised no samples were received. A conference call was held with the New York lab and California office.

The California office advised several sample envelopes were received from the Florida doctor's office that day. All had the wrong "Send To" address and the specimens were discarded because the correct envelop was not used to preserve the tests.



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13

Our Documentation Tool

❖ The issue documentation tool was developed using the CMS's Root Cause Analysis, Impact Analysis, and Corrective Action Plan program audit templates.

❖ CMS templates are located at:

<https://www.cms.gov/Medicare/Compliance-and-Audits/Part-C-and-Part-D-Compliance-and-Audits/ProgramAudits>



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14

Summary

RCA - Root Cause Analysis

- a. Research – Why?
- b. Document – Describe - Chronology

IA - Impact Analysis

- a. Research – Who?
- b. Document - Who, how many, and when?

CAP - Corrective Action Plan

- a. Actions
- b. Document WHAT
 - a. Testing
 - b. When
 - i. Results
 - ii. How
 - iii. Implement
 - iv. Monitor



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15

Questions?



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16

Contact Information

Tammy Hall, Senior Compliance Manager

Email: Thall@healthteamadvantage.com

Thomas Wilson, Vice President, Chief
Compliance and Privacy Officer

Email: Twilson@healthteamadvantage.com



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