

Shadowfax

Title	Corrective Action Plan Policy
Policy Number	ORG.1028.000.000
Initiating Authority	Director, Quality and Compliance
Approved By	Compliance Committee 12-1-21
Origin Date	November 13, 2021
Revision Date	
Effective Date	January 1, 2022
Next Review Date	June 2022
Associated Policies	ORG.1011.000.000 Quality Management
Associated Procedures	
Associated Documents	

I. POLICY STATEMENT

Shadowfax is committed to providing high quality care to individuals in our programs. If a non-compliance or performance gap is identified through external monitoring or audits, Shadowfax will immediately develop and implement specific corrective actions to remedy and improve organizational performance, to come into compliance with our policies, federal, and state regulations, and to prevent the non-compliance from happening in the future.

II. PURPOSE

This policy describes how Shadowfax will develop, implement, and track progress on Corrective Action Plans.

III. SCOPE

This policy applies to all Shadowfax services and programs.

IV. GENERAL

This policy is based on the standards set by PA Code Title 55 Chapter 6100, 6400, 2380, 52, 2390, PA code 6, Chapter 11 and Older Adult Daily Living Center.

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Note: The term "Individual" is synonymous with resident, client, patient, consumer, or participant.

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V. POLICY

Monitoring or Audit

Shadowfax understands that it may be subject to monitoring or audit by authorized Federal and/or State regulatory agencies and/or businesses who have contracted Shadowfax's services.

Shadowfax will cooperate with external monitoring or audit as outlined by applicable regulations and/or contract terms.

Corrective Action Plan (CAP)

If a preliminary determination of non-compliance or a finding is made through the monitoring or audit, Shadowfax will complete a Corrective Action Plan (CAP) to remedy the finding(s). The CAP will be completed in the time frame required by the monitoring or audit party. If the monitoring or audit party specifies a form to be used for the CAP, Shadowfax will use the form.

Shadowfax will comply with the CAP as approved by the monitoring or audit party and will keep the documentation relating to the monitoring or audit.

CAP Development, Contents, and Progress-Reporting

The purpose of a CAP is to implement organizational changes to respond to any findings and to prevent them from reoccurring. The organization will gather appropriate internal and external resources to work to understand any underlying root causes of the findings and address identified root causes in the CAP. Generally speaking, for each finding the CAP will include:

- Realistic, specific, and sustainable actions
- Roles, responsibilities and timing for short-term actions to implement changes including how the actions will mitigate the finding

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- Roles, responsibilities and timing for short and/or long-term actions to prevent the finding from reoccurring, including how the actions will prevent the finding from reoccurring
- Roles, responsibilities and timing for monitoring on-going compliance

It is the responsibility of the highest-level manager of the department where the finding(s) occurred to develop the CAP. All CAPs must be signed off by the Compliance Committee, and shared with the Director, Quality and Compliance to become part of the organization's Quality Management Plan (see policy ORG.1011.000.000 Quality Management). In the interests of transparency, accountability, and centralization at Shadowfax, progress on the CAP shall be reviewed at each Compliance Committee meeting until the CAP is considered complete.

VI. OVERSIGHT

Shadowfax's Compliance Committee or their designee(s) (the "Approved By") shall be in charge of the administration of this Policy. The Approved By responsibilities include:

1. Identifying the action steps to come into compliance and directives to maintain compliance and implement the action steps.
2. Periodically reviewing this Policy and monitoring compliance to it.
3. Training responsible parties on their obligations under the Policy.

Revision History

Name	Date	Reason for Changes	Version