



Documentation of
Corrective Action Plan (CAPS)
Training for OMH
Psychiatric Centers

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's (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 an identified deficiencies or issues raised, therefore reducing the probability of recurrence. A good CAP will include:
 - A clearly defined “problem”
 - 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
 - ▣ Any investigation that reveals “issues raised” (including unsubstantiated allegations)

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					
Incident-Final Classification	Allegation of Abuse or Neglect	Incident Sub Type	Physical abuse		
Findings/Conclusions					

Step #1 cont: Follow Up Details I

Admission & Seclusion Management	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 The “Notice to Provider of Investigation Determination” Letter

When you receive the 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
- The date of the letter – CAP is due 90 days after

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 implementation of CAP actions, close case 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. You would re-close the report after implementation of the recommendation has occurred.

Step #4 – OMH Central Office Review



OMH Central Office CAP unit will review the NIMRS information and contact PC Risk Managers with any questions or CAP modification recommendations.

Step #5 – VPCR – The Oversight and Monitoring Tab

The screenshot displays the 'Oversight and Monitoring' tab in a web browser. The page is titled 'Production - Windows Internet Explorer' and shows the URL 'https://vpcr.justicecenter.ny.gov/epublicsector_ENU/start.swe?SWECmd=Login&SWEPL=1&_sn=RLsc5rgSH3WGgcTwMGLA0zgCOgq18SUHc'. The browser's address bar and menu bar are visible at the top.

The main content area is divided into several sections:

- Monitoring Activities List:** A table with columns for Activity Id, Type, Sub Type, Status, Planned Start, Planned Complet, Actual Start, Actual Completio, Person Responsil, and Description. A red box highlights this table, and a red arrow points to the 'Oversight and Monitoring' tab.
- Form Fields:** A form on the left side of the page contains fields for Activity Title, Activity ID, Case Serial Number, Incident Serial Number, Provider Name, Provider Type, Provider Address, Parent Provider Name, Parent Provider ID, Oversight Agency, and FED ID Number. A red box highlights the 'Activity Type' dropdown menu, which is set to 'Monitoring'. Other fields include Status (Closed), Sub Status (CAP Implemented), Person Responsible (OMHMLAPOINT), Repeat Finding?, and Description.
- Employee Action and User Preferences:** A section on the right side of the page contains fields for Planned Start, Planned Completion, Actual Start, Actual Completion, Due Date, Revised Due Date, Created Date, and Created By. A red box highlights this section.
- Primary Areas of Deficiency:** A section on the right side of the page contains a list of checkboxes for various deficiency areas, including Program/Services, Operations, Compliance, Systemic Ongoing Deficiencies, Patterns of Signif. Complaints, QA/I, Safety, Personnel, and Physical Plant. A red box highlights this section.
- Corrective Actions:** A section at the bottom of the page contains a list of checkboxes for various corrective actions, including Training or Re-training, Policy and Procedure creation or revision, Staffing, Discipline, Administrative, Governance, Financial Restitution, Infrastructure, Routine self-review/QI, Revised or New QA system, System/Program, Sanctions, Fine, CAP/Treatment Plan Revision, Supervisory Oversight Changes, Fire Safety Improvements, Environmental Changes/Management, Medical or Healthcare Changes, Incident Management Changes, Investigation Improvements, Referral To Outside Agency, Referral To Law Enforcement, and Staff Termination. A red box highlights this section.

The browser's taskbar at the bottom shows the Windows Start button, several application icons, and the system tray with the date and time (1:40 PM 7/11/2014).

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.
- **Operations:** To be removed from VPCR list.
- **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.

Areas of Deficiency Definitions cont:

- **Patterns of Significant Complaints:** To be removed from VPCR list.
- **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.

JC Led Investigations

Corrective Action

- To Ensure Safety
- Based on PC Investigations
- How to address identified needs if instructed to stop investigation by the JC.
- CAP Development – JC Investigative Report