Writing an Acceptable Plan of Correction

A plan of correction is required to be written and submitted when a laboratory is found to be out of compliance with the standards set forth by CMS/CLIA. This is documentation of how the issues will be or were addressed and how the situation will be monitored to prevent future problems.

An acceptable plan of correction (POC) must be concise, stating exactly how the deficient practice will be/was corrected. The **required** elements for an acceptable POC are as follow:

1. **The plan of correcting the specific deficiency.** The plan should address the processes that lead to the deficiency cited;

2. **Statement of impact for patients that were affected by the deficient practice;** also, an explanation as to how the laboratory identified other patients who may have been affected by the deficient practice.

3. **The procedure for implementing the acceptable plan of correction for the specific deficiency cited;**

4. **The monitoring procedure to ensure that the plan of correction is effective, and that specific deficiency cited remains corrected and/or in compliance with the regulatory requirements;**

5. **The title of the person responsible for implementing the acceptable plan of correction.**

Recently, the method of how to deliver your plan to the state agent was updated. Previously, it was required that the POC be written directly on form 2567 (statement of deficiencies). Now, it is acceptable to send the plan on a separate document. However, the laboratory director or responsible party must still sign the first page of the 2567 form and return it with the written document.

Things to remember when writing your POC:

1. Make sure to provide the date of completion. If your corrective action has not yet been instituted, give the best estimate for the date in which it will be completed.

2. If you are writing your response by hand, please write legibly. The inability to read the plan may force the agent to deem it unacceptable.

3. Submit all documentation at one time. If documents are sent piecemeal, they may be lost in the shuffle, causing the plan to be deemed unacceptable.