Writing a Comprehensive Corrective Action Plan

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Agenda

- Discuss what a corrective action plan is
- Why are facilities required to submit corrective action plans?
- What must be included in a corrective action plan?
- Examples of comprehensive corrective action plans
- Examples of unacceptable corrective action plans
- Activity: Writing a comprehensive corrective action plan
- Activity: Determining if the corrective action submitted is acceptable.
What is Corrective Action?

• The **action** the facility will take within a specific timeframe to address the finding(s) or non-compliance and to prevent it from recurring. 2 CFR 200.26

• Facilities are required to provide a written corrective action response to the review findings within the timeframe designated by the State Agency.
Corrective Action

- New or improved processes or procedures
- Implemented within a specific time frame
- Expected to resolve the condition that resulted in noncompliance
- Expected to prevent recurrence
- Identifies who is responsible for implementing and maintaining new processes or procedures
Why Are You Required to Submit Corrective Action?

- Requiring a facility to develop a corrective action response assists in:
  - Understanding what the facility and/or staff is doing incorrectly and what they need to do to make improvements
  - Document the facility’s plan for improvement
  - Provide an opportunity for the State Agency (SA) to evaluate and accept the corrective action or request additional information or clarification
  - Provide sufficient detail so that during any follow-up reviews it can be determined whether the issues were corrected and those corrections have been permanently maintained.
Why

• The institution must identify why the problem is occurring

• The 5 Whys that you need to ask are:

  - What
  - Who
  - How
  - When
  - Where

Root-Cause Analysis
Examples of Why Questions to Ask

Let’s say that the SA is on-site conducting a meal-service observation and notice the cook is serving orange drink for the fruit/vegetable component for breakfast. Upon questioning the cook, she indicates that the orange juice is listed on the posted menu for the day. However, no orange juice is available. All they have is milk, full-strength apple juice, and orange drink. In order to stay as close as possible to the posted menu, she decided to serve the orange drink since it has vitamin C and pictures of fresh-cut oranges on the container. The cook said she did not know that orange drink did not meet meal-pattern requirements. As such, the SA cites the facility for failure to meet the meal-pattern requirements noted in 7 CFR 226.20(c).
5 WHYs Method

- Why was the meal not reimbursable?
  - Because – the meal failed to meet meal-pattern requirements

- Why did the cook not serve orange juice for breakfast?
  - Because – other than milk and full-strength apple juice, the orange drink was the only drink available to serve.

- Why did the cook select the orange drink?
  - Because the cook wanted to serve something close to the posted menu as possible.

- Why did the cook assume the choice was acceptable?
  - Because it appeared to be similar to orange juice. It had pictures of fresh-cut oranges on the label, and it included the wording “naturally flavored” and it had Vitamin C.
Root-Cause

• Now that we have asked all the Why’s what do we think would be the Root-Cause?

Lack of Training
Corrective Action Plan

• Details step by step actions.
• Actions must resolve the root-cause condition that resulted in the noncompliance.
• Actions must prevent recurrence.
• Process and procedures are consistent with federal regulations, State Policy, and organization requirements.
Developing the Corrective Action Plan

**What**
- *What* processes and procedures will be implemented to correct the finding?

**Who**
- *Who* is ultimately responsible for implementing the processes and internal controls?

**How**
- *How* will the facility ensure the processes and procedures are followed consistently to prevent recurrence?

**When**
- *When* will the processes and procedures be implemented and at what frequency?

**Where**
- *Where* will the documentation be retained?
CAP Supporting Documentation

- Income eligibility forms
- Enrollment forms
- Menus
- Child nutrition (CN) labels / manufacturers’ product formulation statement
- Recipes
- Attendance records
- Meal-count forms
Activity CAP Analysis
Activity CAP Analysis

1. In your team, read and discuss the finding and required action.

2. Determine the root-cause using the 5 Whys method.


4. Be prepared to report your decisions.
Developing the Corrective Action Plan

**What**
- What processes and procedures will be implemented to correct the finding?

**Who**
- Who is ultimately responsible for implementing the processes and internal controls?

**How**
- How will the facility ensure the processes and procedures are followed consistently to prevent recurrence?

**When**
- When will the processes and procedures be implemented and at what frequency?

**Where**
- Where will the documentation be retained?
Debrief
Monitoring a CAP

- Accept the CAP
- Verify Implementation
- Conduct follow-up visits (if needed)
Best Practices for Sustainability

• Provide on-going training on all policy and procedures
• Develop a facility specific training program to address noncompliance
• Monitor your facility on a quarterly basis
• Establish and document policies for responding to a corrective action and for writing CAP’s
• Conduct follow-up visits to review the CAP
• What additional best practices would you recommend??
Activity: Developing a CAP

- Work with a partner to write your CAP
- Review the finding and determine the root-cause using the five whys method.
- Develop a CAP using what, who, how, when and where
ACTIVITY: DEVELOPING A CAP

Root-Cause Analysis: 5 Whys Method

1. **Why?** Why were meals disallowed? **Because** the meals did not meet meal pattern requirements.

2. **Why?** Why did the meals not meet meal-pattern requirements? **Because** the meals did not have credible food.

3. **Why?** Why was the food not credible? **Because** the cook failed to follow meal pattern requirements?

4. **Why?** Why did the cook fail to follow meal-pattern requirements? **Because** the cook was not trained on the current meal-pattern.

What is the Root-Cause – Lack of training on the current meal-pattern and edit checks for reimbursement.
What should your CAP look like

- Put CAP on your Letterhead
- Write down your responses for your CAP
- Sign and Date your CAP
- Add any attachments
- Send to the State Agency for Review
REVIEW - RECAP

• Purpose of corrective action
• Root-cause analysis
• Corrective Action plan requirements
• Components of a CAP and evaluating effectiveness
• Best Practices
Questions?

THANK YOU!