

**REVIEW
NORTHCARE NETWORK**

POLICY TITLE: Corrective Action Plan	CATEGORY: Compliance	
EFFECTIVE DATE: 3/21/13	BOARD APPROVAL DATE: 3/21/13	
REVIEWED DATE: 10/25/23	REVISION(S) TO POLICY STATEMENT: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	OTHER REVISION(S): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
RESPONSIBLE PARTY: Compliance & Privacy Officer	CEO APPROVAL DATE: 11/7/23 Megan Rooney, CEO	

APPLIES TO

NorthCare Network Personnel
Network Providers

POLICY

Corrective action may be imposed as a means of facilitating the overall NorthCare Network Compliance Plan goal of full compliance. Corrective action plans should assist NorthCare Network’s staff, and Network Providers to understand specific issues and reduce the likelihood of future noncompliance. Corrective action, however, shall be sufficient to address the instance of noncompliance and should reflect the severity of the noncompliance.

PURPOSE

The purpose of this policy is to articulate NorthCare Network’s commitment to adherence to standards contained and/or referenced in its Compliance Plan regarding Corrective Action plans.

DEFINITIONS

N/A

REFERENCES

- NorthCare Network Compliance Plan and Policies
- PNM_Network Provider Oversight Monitoring & Evaluation Policy
- QI Medicaid Service Verification

HISTORY

REVISION DATE: 12/18/13, 11/5/14, 12/3/19, 10/21/20, 1/5/21, 10/18/21, 10/18/22,10/25/23

REVIEW DATE: 3/13/13, 12/18/13, 11/5/14, 9/16/15, 7/26/16, 5/16/17, 3/13/18, 1/22/19, 12/3/19, 10/21/20, 1/5/21, 10/18/21, 10/18/22, 10/25/23

CEO APPROVAL DATE: 3/13/13, 12/18/13, 11/5/14, 10/6/15, 8/2/16, 6/6/17, 3/27/18, 2/7/19, 1/7/20, 11/3/20, 1/5/21, 11/2/21, 11/1/22, 11/7/23

BOARD APPROVAL DATE: 3/21/13

PROCEDURES

A. Basis for Corrective Action

Monitoring and auditing activities, failure to meet contract and/or performance standards, and reports of questionable practices may form the basis for imposing corrective action.

B. Elements of a Corrective Action Plan

As appropriate given the nature of the noncompliance, a corrective action plan shall include:

1. A resolution for specific problems identified.
2. A recommendation to repay or not bill inappropriate claims or reverse encounters reported or not report encounters.
3. Report to appropriate government authorities about the non-compliance as appropriate.
4. A recommendation to change policy, procedures, or business practices to remediate or reduce the likelihood of recurrence and to monitor the adoption of a compliance with the recommendations.
5. Additional mandatory education and training for staff who are the subject of the corrective action.
6. Identification of responsible party/parties for the corrective action and target date for completion; and
7. Other corrective measures as required.

C. NorthCare Network's site review/monitoring team/staff, Network Management Committee, CEO, and/or Leadership Team, depending on the situation, are responsible to review and accept corrective action plans or request further action or clarifications. Corrective Action Plans will be monitored at least annually at the time of provider reviews.

D. Ramifications for Failure to Implement Corrective Action are outlined in contract language and NorthCare Network's Sanction Policy.