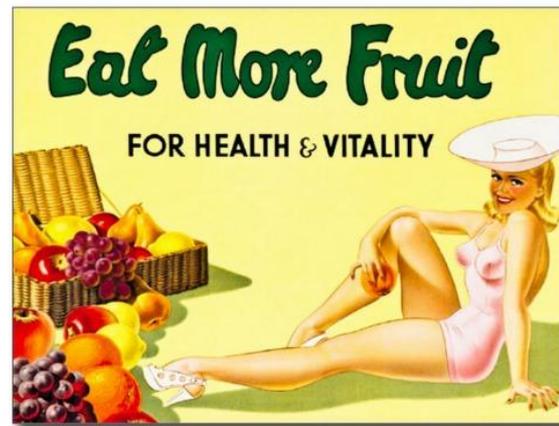


# Corrective Action Plans for Management Evaluations



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Program Integrity Manager

# Purpose of the ME

- The purpose is to highlight the areas of excellence and correct any deficiencies
- Offer assistance to local agency staff
- The ultimate purpose of the ME is to provide the best service to Arizona participants

**What's for dinner today, baby?**

Something pretty special... is Gerber's Strained Foods, no doubt! For Gerber's are the people who make baby foods and nothing else... offer a really complete menu for babies. Delicious fruits and vegetables with appetizing true-to-nature colors and flavors. Nourishing soups... wholesome desserts. All carefully prepared by experts... all blending with natural goodness... all with the special extra-milk texture your baby prefers!

Gerber's Strained Meats are tempt you, too, for your rapidly growing baby. Made from selected **ARMOUR** cuts... specially prepared for a minimum of fat and fiber. Easy on milk to digest! Rich in important body-building complete proteins that babies need. Gerber's Meats are juicy, savory, appetizing. Ready to serve... economical... no waste!

There's enjoyment for your baby at every age... with Gerber's four Baby Cereals... 24 Strained Foods... and over 20 Junior Foods with tender, strained texture (perfect for baby)! A wonderful choice... to help baby associate food with fun... encourage good eating habits!

**Check Your Favorite's Favorites!**

**GERBER'S NEWEST ACQUISITIONS:**

- Strained Orange Juice
- Strained Egg Yolk
- Strained Apples

**GERBER'S STRAINED MEATS:**

- Beef
- Beef Liver
- Lamb
- Beef Heart
- Pork & Bacon

**GERBER'S STRAINED VEGETABLES & SOUPS:**

- Spinach
- Sweet Potatoes
- Carrots
- Vegetables & Lima Beans
- Green Beans
- Vegetables & Lentils
- Peas
- Vegetables & Cashews
- Tomatoes
- Vegetables & Beef

**GERBER'S STRAINED FRUITS AND DESSERTS:**

- Peaches
- Plums with Tapioca
- Applesauce
- Custard Pudding
- Pears & Raisins
- Orange Pudding
- Apricot Applesauce
- Banana Pudding

Babies are our business... our only business!

**Gerber's BABY FOODS**

4 CEREALS • 40 STRAINED & JUNIOR FOODS, INCLUDING MEATS

Gerber's Baby Foods: (National) C.F. Fritzsche, (Chicago) W.K. Fritzsche, (N.Y.) Fritzsche Foods Co. (Canada)

# Purpose of the CAP



- The CAP is a resource to use to improve the program
- Address and correct any deficiencies
- The ultimate purpose of the ME is to provide the best service to AZ participants

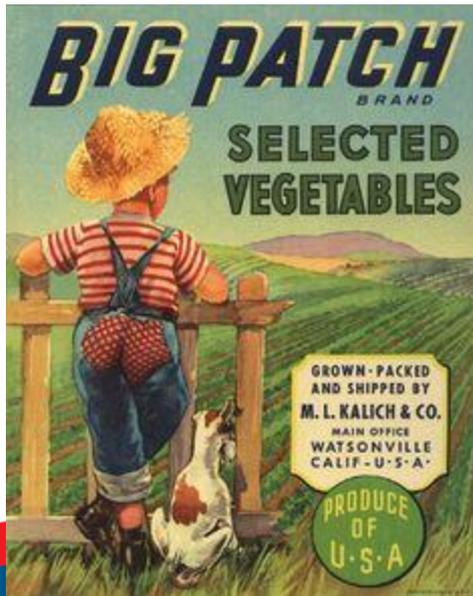
# Getting Started

- Understand the finding
  - Not all findings are equal
  - Complex vs. Simple
- Complex
  - Could this cause harm?
  - Could this cause the Program to repay funding source?
  - Is this a repeat finding?
- Simple



# Separate the complex and simple

- Find the root cause and address it
  - Monitor results
  - Follow up
  - Prevent reoccurrence
- Refer to available resources
  - Nutrition Consultant
  - Training Needs Assessment
  - Nutrition Education Plan
  - P&P
  - Local Agency Self-Assessment



# Things to Include

- Who
  - Use job titles, not names
- What
  - Be specific—Tell me more
- Where
  - May not always apply
- When
  - Target dates and frequency
- Why
  - May not always apply
- How
  - Be specific—Tell me more



# Things not to include in CAPs



- Justifications
- Excuses or reasons why the finding occurred should not be included in your response
- These are not corrective actions

# Things to consider

- The CAP is a resource to use to improve the program
- This is an official document
- Provided to USDA
- Think long term, BIG PICUTRE



# Example

- **Finding:** Reconciliation reports for voided WIC Food Instruments (FIs) are not being completing on a weekly basis.
  - **Required Corrective Action:** Complete the reconciliation report on a weekly basis.
  - **CAP:** All staff will be trained on how to complete the reconciliation report.

# Corrective Action Plan

Description of Task/Step	Person Responsible	Target Timeline
Lead CNW will be trained on how to correctly complete reconciliation report.	WIC Director	June 1, 2015, follow up as needed
Reconciliation report will be generated and completed using HANDS. (If there are no voids, the report will still be generated, signed off on, and filed)	Lead CNW at each clinic	Weekly
Reconciliation report will be reviewed, verified, and signed off on.	Clinic supervisors	Weekly

# WIC Corrective Action Plan Exercise 1

- **Finding:** A representative sample of chart reviews shows staff are not documenting nutrition education contact in the care plan.
- **Required Corrective action:** Review and train staff on when and where to document nutrition education contact at least annually, and ensure this is being completed by conducting chart reviews during the Local Agency Self-Assessment (LASA).

# Corrective Action Plan 1

Description of Task/Step	Person Responsible	Timeline /Frequency
Staff will be trained on documenting nutrition education contact.	Training Lead	June 30, 2015 and Annually
Monitoring of documentation of nutrition education contact will take place during the Chart Review portion of the Local Agency Self-Assessment.	Supervisors	Once during ME year, Twice during non ME years
If chart reviews show a deficiency, agency wide, in documenting nutrition education contacts, subsequent training will be provided.	Training Lead	As needed
If chart reviews show a deficiency amongst a few staff members, individual follow up training will be provided.	Training Lead	As needed

# WIC Corrective Action Plan Exercise 2

- **Finding:** During observations it was noted not all staff are offering authorized representatives the right to identify a proxy for their WIC account
- **Required Corrective action:** Review and train staff on the proxy policy at least annually, and ensure this is being completed by conducting observations during the Local Agency Self-Assessment (LASA).

# Corrective Action Plan 2

Description of Task/Step	Person Responsible	Timeline /Frequency
Staff will be trained on proxy policy at staff meeting.	Training Lead	June 30, 2015 and Annually
During staff observations, staff will be monitored for offering authorized representatives the right to a proxy during the Local Agency Self-Assessment	Supervisors	Once during ME year, Twice during non ME years
Individual follow up training will be provided	Supervisors	As needed, After observations

# WIC Corrective Action Plan Exercise 3

- **Finding:** Staff were observed not offering nutrition education to clients. Instead, they only offered clients positive affirmations.
- **Required Corrective Action:** Train and coach staff on how to offer and provide nutrition education based on assessment results and/or the needs of the client. Also include how to discuss next steps, and how to summarize the nutrition education session.

# Corrective Action Plan 3

Description of Task/Step	Person Responsible	Timeline /Frequency
<p>Per the Nutrition Education Work Plan for FFY 2015-2016 the following elements of nutrition education will be reviewed during in-services:</p> <ul style="list-style-type: none"> <li>• Offering nutrition education at appropriate times</li> <li>• How to offer different education topics based on the assessment and/or client's interest</li> <li>• Offering anticipatory guidance</li> <li>• How to tailor the discussion around the client's needs and interest in the spirit of PCS</li> <li>• How to use OARS</li> <li>• Asking permission</li> <li>• Using Consensus</li> <li>• Explore offer explore (ideas and feelings)</li> </ul>	<p>Training Lead</p>	<p>Beginning June 30, 2015 At each monthly in-service</p>

Description of Task/Step	Person Responsible	Timeline /Frequency
<p>Per the Nutrition Education Work Plan for FFY 2015-2016 the following elements of nutrition education will be reviewed during in-services:</p> <ul style="list-style-type: none"> <li>• How to discuss next steps with clients</li> <li>• How to summarize the nutrition discussion</li> </ul>	Training Lead	Beginning June 30, 2015 At each monthly in-service
<p>During in-services staff will also be trained on the difference between positive affirmations and nutrition education.</p>	Training Lead	Beginning June 30, 2015 At each monthly in-service
<p>Staff will be observed during the Local Agency Self-Assessment and provided feedback, coaching, and mentoring .</p>	Site Supervisors	Once during ME year, Twice during non ME years
<p>Follow up mentoring and training will be provided to individuals as needed .</p>	Site Supervisor and Training Lead	As needed

# WIC Corrective Action Plan Exercise 4

- **Finding:** During observations it was noted staff are not consistently reviewing the “Your Pledge to WIC” section on the “Rights and Obligations” form with the clients.
- **Required Corrective action:** Per Arizona WIC Policy, in a language the client understands, the certifier needs to explain, at minimum, the “Your Pledge to WIC” section from the “Rights and Obligations” form. Review and train staff on this section of the form at least annually. Ensure staff are reviewing the required section during staff observations during the Local Agency Self-Assessment (LASA).

# Corrective Action Plan 4

Description of Task/Step	Person Responsible	Timeline /Frequency
Staff will be trained on how to correctly review the required sections of the Rights and Obligations form with clients.	Training Lead	June 30, 2015, Annually
During staff observations, staff will be monitored during the Local Agency Self-Assessment	Supervisors	Once during ME year, Twice during non ME years
Individual follow up training will be provided	Supervisors	As needed, After observations

# WIC Corrective Action Plan Exercise 5

- **Finding:** A representative sample of chart reviews showed only 40% of high risk clients were referred to the Registered Dietitian (RD) by staff.
- **Required Corrective Action:** Use available resources, such as the monthly “High Risk Report” to determine why referrals are being missed, and provide training. It is recommended to train staff on a continuous basis on the high risk codes that require a referral and visit to the RD or Nutritionist. Include in the plan how staff will be trained and what follow up will be provided to ensure clients are being referred and seen.

# Corrective Action Plan 5

Description of Task/Step	Person Responsible	Timeline /Frequency
During in-services staff will be trained on high risk codes that require a referral to the dietitian	Clinic RDs	June 30, 2015 at each monthly in-service
Staff will be trained on how to schedule an appointment with the dietitian	Clinic RDs	June 30, 2015 At each monthly in-service
High risk report will be reviewed to check for referrals	Clinic RDs	Monthly
Staff will be notified of both referrals made and missed referrals	Clinic RDs	Monthly
<p>Staff will contact clients with missed referrals and reschedule their next appointment to be with the dietitian</p> <p>Staff will inform dietitian that appointments have been made</p>	Staff	Monthly
If/as needed one on one training will be provided to staff who repeatedly miss referrals	Clinic RDs	As needed



# Summary

- Find the root cause; acknowledge and address it
    - Monitor results
    - Prevent reoccurrence
    - Follow up
  - 5 Ws & H
  - Big Picture
  - Not looking for a quick fix
  - No justifications
  - Nutrition Consultant
  - Training Needs Assessment
  - Nutrition Education Plan
  - Local Agency Self-Assessment
- The CAP is a resource to use to improve the program

