



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Division of Health Care Quality
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Circular Letter: DHCQ 12-12-577

TO: Administrators of Licensed and Certified Facilities, Agencies and Providers

FROM: Madeleine Biondolillo, MD

DATE: December 10, 2012

RE: Electronic Submission of Plans of Correction

The Department of Public Health, Division of Health Care Quality is pleased to announce that, beginning immediately, facilities may submit a scanned .pdf copy of their Plan of Correction (POC) to the Department by email. Effective January 1, 2013, facilities will be required to submit POCs by email for all statements of deficiency.

As facilities must submit a POC within ten days of the receipt of a statement of deficiency, submission of a POC by email will allow administrators time up until the tenth day to complete their plan and make their submission to the Department in a timely, cost effective and environmentally friendly manner. Upon receipt of a POC, the Department will attach the documents submitted into its database for survey results so that information from the facility is readily available to surveyors and supervisors.

The Department has created three email addresses to ensure that POCs can be submitted to the appropriate surveyors and regions for review:

- Recertification Surveys: HCQCertPOC@MassMail.State.MA.US
- Complaints & Enforcement: HCQComplaintPOC@MassMail.State.MA.US
- Licensure: HCQLicensePOC@MassMail.State.MA.US

Detailed instructions for the submission of POCs by email, including the specific email address to which the POC should be sent, will be included in the cover letter to the facility for each Statement of Deficiency. The following must be observed when submitting POCs by email:

- Title the email “[Facility name] POC for Survey Ending [date of survey]”

- Scan the POC, signed and dated, separately from any supporting documentation
- Scan the POC and supporting documentation as separate .pdf files
- Name the scanned files using the facility name and ending date of the survey
- Do not send a hard copy of the POC by mail or fax when emailing a POC

When a POC is received at one of the three email addresses established for submissions, the facility will receive an automated response indicating that the POC has been received. Addressing the email with a facility name and date of survey will generate an auto-reply email which will serve as a receipt for the initial submission of a POC, and indicate that the POC has been received by the Department and is being processed for review.

If a POC is acceptable, the Department will conduct a desk audit or follow-up visit to ensure corrective action has been taken. If a POC is unacceptable, a surveyor will contact the facility directly by phone or email. If an amended POC is required, it must be sent to the same email address to which the POC was originally submitted. Surveyors may request to be copied on the submission of a revised POC to facilitate the timely review of the plan.

It is extremely important that each POC be scanned separately from any supporting documentation, and that no POC contain names, room numbers or other identifiers that would allow personal or medical information to be linked to an identified individual. Scanning supporting information separately from the POC will help protect patient, resident and staff privacy, as facilities are reminded that the Centers for Medicare and Medicaid Services will be posting POCs on their website at some time in the future.

As facility administrator email addresses change frequently, the Department will continue to mail the Statement of Deficiency for each survey and complaint to the facility to ensure delivery in a timely manner. The Department anticipates that at some point in the next year CMS will pilot an application which will allow facilities to electronically access Statements of Deficiency and submit POCs. Information regarding this application will be shared as it becomes available.

Nursing homes are reminded that the Department's Informal Dispute Resolution (IDR) process requires that IDR and IIDR requests be submitted in writing. Additional information regarding the IDR and IIDR process for nursing homes is available at: <http://www.mass.gov/eohhs/docs/dph/quality/hcq-circular-letters/dhcq-1112554.pdf>

For questions regarding the Department's policy on the electronic submission of POCs please contact Sherman Lohnes at 617-753-8160. **Please note that no information as to when a Statement of Deficiency will be completed or mailed is available through this number.**

Questions regarding a particular plan of correction, statement of deficiency or findings should be directed to the regional manager or complaint manager associated with the statement of deficiency.

Questions regarding the processing of a plan of correction should be directed to the survey, complaint or licensing support staff member listed in the auto-reply to a facility's email submission of a POC.