How to Write Corrective Action Plans
A Ten Step Process

The purpose of this procedure is to ensure that participants, representatives, consultants and APD staff follow the federal requirement for addressing and correcting major issues or problems that the participant and/or representative has in managing their services or budget. This procedure is meant to ensure that the participant and/or representative has access to additional information, counseling, training or assistance regarding the CDC+ program. A corrective action plan is to be implemented by the consultant when directed to do so by APD; when the participant or representative mis-uses or mis-manages CDC+ funds by making purchases that are not approved or by not being able to produce documentation for a purchase made with CDC+ funds; when problems with quality of care exist; or when any other consistent problem with the participant’s or representative’s care management, program management, or budget management responsibilities is identified. The current Corrective Action Plan form can be found in the Appendix to the How-To Guide on the following website
http://apd.myflorida.com/cdcplus/docs/appendix/appendix.pdf

1) Gather Information: Identify the problem or concern. Does the participant or representative recognize or agree there is a problem? Use objective, neutral terms to describe the problem. Inform the participant/representative a corrective action plan is needed.

2) Assess the situation: Is this a problem the participant can solve if direction, support or education were provided? Is the situation causing direct harm to the participant? Does the situation indicate neglect of program responsibilities?

3) Listen: Discuss with the participant/representative the reasons why the problem occurred and suggestions to correct the problem.

4) Identify: What supports (training, technical assistance, etc.) would assist the participant/representative in correcting the problem?

5) Negotiate: The corrective action plan should be negotiated with the participant/representative and agreed upon by all parties.
   • Develop the corrective action plan with the participant/representative without placing the participant’s health and safety at risk.
   • Determine the amount and duration of unpaid, natural supports that are necessary to help resolve the overspending and/or negative balance using the tools provided by APD.
   • The corrective action plan may be written in an informal manner but must include at a minimum the problem or concern which precipitated the need for a corrective action plan;
   • The corrective action plan must identify the specific corrective action to be taken to resolve the problem.
   • The corrective action plan must be signed by the participant and/or representative and the consultant;

6) Implement the corrective action plan and increase contacts and supports.
   • The corrective action plan must have an implementation date and an ending date;
   • The consultant will submit the CAP and Purchasing Plan to Field Office Liaison;
   • Field Office Liaison will submit the CAP and Purchasing Plan to designated APD CDC+ State Office staff.
   • The APD State Office staff will enter the CAP detail information into both the F/EA business system and Purchasing Plan system.
   • All contacts related to the CAP must be documented in the participant record.

7) Monitor progress in correcting problems. Offer assistance and feedback as needed.

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8) **Communicate**: Inform the participant/representative of your assessment of progress or lack of progress with the corrective action plan. Provide concrete examples to document your assessment of progress or lack of progress.

9) **Revise**: Revise or discontinue the corrective action plan as needed.

10) **Document**: Document the successful resolution of problems and discontinuation of a correction action plan.
    - Notify local APD Field Office Liaison for CDC+ of resolution;
    - If problems are not resolved, the consultant should follow the procedures for disenrollment.

**NOTE**: Only the CDC+ Administrator in the APD Central Office has the authority to approve the involuntary disenrollment of a consumer recommended for disenrollment by the APD Field Office.