| Audit Review Period:        |  |   |  |  |  |
|-----------------------------|--|---|--|--|--|
|                             |  |   |  |  |  |
| Issue(s) of non-compliance: | Auditors:  | Issue   |  |  |  |
|                             | Select All that Apply  |   |  |  |  |
|                             |  | Initial personnel competencies  |  |  |  |
|                             |  | Personnel licensure   |  |  |  |
|                             |  | OIG exclusion checks  |  |  |  |
|                             |  | Background checks   |  |  |  |
|                             |  | Communicable disease clearance  |  |  |  |
|                             |  | Driver Specific Training  |  |  |  |
| •                           | 1.95-1   |   |  |  |  |
| Scope:                      | The state of the s | etencies:  lact Analysis is limited to 50% of staff (including employees and contractors) during the audit review period who were not included in the personnel neet the following criteria:                                  |  |  |  |
|                             | · ·  | during the audit review period; and   |  |  |  |
|                             | · · · · · · · · · · · · · · · · · · ·  | pant contact in the PACE centers or participant homes.  |  |  |  |
|                             | i i  |   |  |  |  |
|                             | Personnel licensure:   |   |  |  |  |
|                             | · · · · · · · · · · · · · · · · · · ·  | eact Analysis is limited to 50% of staff (including employees and contractors) during the audit review period who were not included in the personnel and direct participant contact in the PACE centers or participant homes. |  |  |  |
|                             | OIG exclusion checks:  |   |  |  |  |
|                             | • The scope of the Impact Analysis is limited to 50% of staff (including employees and contractors) during the audit review period who were not included in the personnel  |   |  |  |  |
|                             | · · · · · · · · · · · · · · · · · · ·  | neet the following criteria:  |  |  |  |
|                             | 1. Were newly hired during the audit review period; and 2. Had direct participant contact in the PACE centers or participant homes.  |   |  |  |  |
|                             |  |   |  |  |  |
|                             |  |   |  |  |  |
|                             | Background checks:   |   |  |  |  |
|                             | • The scope of the Impact Analysis is limited to 50% of staff (including employees and contractors) during the audit review period who were not included in the  |   |  |  |  |
|                             | · ·  | neet the following criteria:  |  |  |  |
|                             |  | during the audit review period; and   |  |  |  |
|                             | 2. Had direct particip   | pant contact in the PACE centers or participant homes.  |  |  |  |
|                             | Communicable disease clearance:  |   |  |  |  |
|                             | • The scope of the Impact Analysis is limited to 50% of staff (including employees and contractors) during the audit review period who were not included in the personnel  |   |  |  |  |
|                             | sample selection and m   | neet the following criteria:  |  |  |  |
|                             | 1. Were newly hired  | during the audit review period; and   |  |  |  |
|                             | 2. Had direct particip   | pant contact in the PACE centers or participant homes.  |  |  |  |
|                             | i i  |   |  |  |  |
|                             | Driver specific training   |   |  |  |  |
|                             | The scope of the Imp.  | act Analysis is limited to 50% of staff (including employees and contractors) during the audit review period who were not included in the personnel   |  |  |  |
|                             | sample selection and tr  | ransported participants.  |  |  |  |
|                             |  |   |  |  |  |
| Instructions:               | General:   |   |  |  |  |
| macraetta.                  |  | e is the audit review period. Errors noted prior to the audit review period should not be included.   |  |  |  |
|                             | - The review timenani  | and the additional period. Errors noted prior to the additional period should not be included.  |  |  |  |
|                             | After completing the   | Impact Analysis, if any changes need to be made to the Root Cause Analysis, please update the changes in the RCA tab.   |  |  |  |
|                             |  |   |  |  |  |
|                             | Respond to the quest   | tions in the participant impact tab.  |  |  |  |
|                             |  |   |  |  |  |
| Impact Analysis Due Date:   |  |   |  |  |  |
|                             |  |   |  |  |  |

| Date Identified       | Brief Description Of Issue        | Condition Language                |
|-----------------------|-----------------------------------|-----------------------------------|
| (MM/DD/YY)            | (Completed By The CMS Audit Lead) | (Completed By The CMS Audit Lead) |
| (Completed By The CMS |                                   |                                   |
| Audit Lead)           |                                   |                                   |
|                       |                                   |                                   |
|                       |                                   |                                   |
|                       |                                   |                                   |
|                       |                                   |                                   |
|                       |                                   |                                   |

| Detailed Description of the Issue                       | Root Cause Analysis for the Issue | Methodology - Describe the process that  | # of Individuals | Action Taken to Resolve System/ |
|---|-----------------------------------|--|------------------|---------------------------------|
|   | (Explain why it happened)         | was undertaken to determine the # of     | Impacted         | Operational Issues              |
| (Explain what happened)                                 |                                   | individuals (e.g. participants) impacted |                  |                                 |
| (Remaining fields to be Completed by PACE Organization) |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |
|   |                                   |  |                  |                                 |

| Date System/ Operational Remediation | Date System/ Operational Remediation | Actions Taken to Resolve Negatively Impacted Individuals | Date Individual Outreach and Remediation | Date Individual Outreach and |
|--------------------------------------|--------------------------------------|--|--|------------------------------|
| Initiated                            | Completed (MM/DD/YY)                 | Including Outreach Description and Status                | Initiated                                | Remediation Completed        |
| (MM/DD/YY)                           |                                      |  | (MM/DD/YY)                               | (MM/DD/YY)                   |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |
|                                      |                                      |  |  |                              |

| General Information: This information is to be completed for all Impact Analyses |                    |           |                 |              |                     |  |                            |          |
|--|--------------------|-----------|-----------------|--------------|---------------------|--|----------------------------|----------|
| Employee First Name  | Employee Last Name | Job Title | Job Description | Date of Hire | Date of Termination | Type of Employment   | Direct Participant Contact | License  |
|  |                    |           |                 |              |                     | Enter contract, Full-time, Part-<br>time, Volunteer, or Other. | (Yes/No)                   | (Yes/No) |
|  |                    |           |                 |              |                     |  |                            |          |

| This information is to be completed if the Impact Analysis is being requested for: Initial personnel competencies |  |  |  |  |  |  |
|---|--|--|--|--|--|--|
| Is there documentation that the staff member's competency was evaluated prior to                                  | Date of competency evaluation completed. | Date of individual providing participant care independently. |  |  |  |  |
| them working independently?   |  |  |  |  |  |  |
|   | MM/DD/YYYY                               | MM/DD/YYYY   |  |  |  |  |
| (Yes/No)  |  |  |  |  |  |  |
|   | Enter Not Completed if the competency    |  |  |  |  |  |
| *This requirement only applies to personnel newly hired during the audit review period.                           | evaluation was never done.               |  |  |  |  |  |
| period.   |  |  |  |  |  |  |
| If the auditor did not select Initial personnel competencies on the instructions tab                              |  |  |  |  |  |  |
| the PO may enter NA in fields J-L.  |  |  |  |  |  |  |
|   |  |  |  |  |  |  |
| Enter NA if the employee did not have direct participant contact during the audit                                 |  |  |  |  |  |  |
| review period.  |  |  |  |  |  |  |

| This information is to be completed if the Impact Analysis is being requested for: Personnel licensure       |   |   | This information is to be completed if the Impact Analysis is being requested for: OIG exclusion checks       |   |  |
|--|---|---|---|---|--|
| Is the staff member required to have a license in order to perform care in the PO's state?                   |   |   | completed before the date of hire?  | Date the OIG check was completed.  MM/DD/YYYY             |  |
| (Yes/No)   | *This requirement applies to all personnel.                     | (Yes/No)  | (Yes/No)  | Enter Not Completed if the OIG check was never completed. |  |
|  | Enter NA if the staff member is not required to have a license. |   | *This requirement only applies to personnel newly hired during the audit review period.                       |   |  |
| If the auditor did not select Personnel licensure on the instructions tab the PO may enter NA in fields M-O. |   | did not have direct participant contact during the audit review | If the auditor did not select OIG exclusion checks on the instructions tab the PO may enter NA in fields P-Q. |   |  |
|  |   |   |   |   |  |

| This information is to be completed if the Impact Analysis is being requested for: Background checks |   | This information is to be completed if the Impact Analysis is being requested for: Communicable disease clearance |   |  |
|--|---|---|---|--|
| Is there documentation that a background check was completed   | Date the background check was completed.              | Is there documentation that the staff member was evaluated by a PCP, NP, or PA, and determined to                 | Date the individual was screened/medically cleared of communicable          |  |
| before the date of hire?   |   | be free of communicable diseases prior to engaging in direct participant contact?                                 | diseases.   |  |
|  | MM/DD/YYYY  |   |   |  |
| (Yes/No)   |   | (Yes/No)  | MM/DD/YYYY  |  |
|  | Enter Not Completed if the background check was never |   |   |  |
|  | completed.  | *This requirement only applies to personnel newly hired during the audit review period.                           | Enter Not Completed if the individual was never medically cleared.          |  |
| *This requirement only applies to personnel newly hired during                                       |   |   |   |  |
| the audit review period.   |   | If the auditor did not select Communicable disease clearance on the instructions tab the PO may                   | Enter NA if the staff member did not have direct participant contact during |  |
|  |   | enter NA in fields T-U.   | the audit review period.  |  |
| If the auditor did not select Background checks on the   |   |   |   |  |
| instructions tab the PO may enter NA in fields R-S.  |   | Enter NA if the staff member did not have direct participant contact during the audit review period.              |   |  |
|  |   |   |   |  |
|  |   |   |   |  |

| This information is to be completed if the Impact Analysis is being requested            | General Information: This information may be completed for all Impact Analyses   |  |  |
|--|--|--|--|
| Potential delication and delication and the different benefit and a fall                 | In the state of th | In the day have deliberated by the Difference by | Sold and Direct and another the sold and the |
| Date the driver was provided training on handling the special needs of the participants. | Date the driver was provided training on handling emergency situations.  | Date the driver began driving participants for the PACE organization.  | Optional: Please note, you do not have to complete this column.  |
| MM/DD/YYYY   | MM/DD/YYYY   |  | If there are any mitigating factors that you would like CMS to consider related to a specific staff member please enter the information in this column.  |
|  | Enter Not Completed if the individual was never provided training.   |  | specific stail member please effect the information in this column.  |
| Enter Not Completed if the individual was never provided training.                       |  |  |  |
| If the auditor did not select Driver Specific Training on the instructions tab           |  |  |  |
| the PO may enter NA in fields V-X.   |  |  |  |
|  |  |  |  |
|  |  |  |  |