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Public Health**



**EDMUND G. BROWN JR.**  
*Governor*

December 7, 2015

AFL 15-23

**TO:** Nursing Facilities (NF)  
Skilled Nursing Facilities (SNF)

**SUBJECT:** Automated Survey Processing Environment (ASPEN) Web: Electronic Plan of Correction (ePOC) Implementation for Federally Certified Skilled Nursing and Nursing Facilities (SNF/NF) - Provider Access Request

**AUTHORITY:** Title 42 Code of Federal Regulations (CFR), section 488.402(d)

**All Facilities Letter (AFL) Summary**

- Providers are invited to participate in the ePOC web based application, which allows providers to receive their Statement of Deficiencies (CMS-2567) and submit their Plan of Correction (POC) electronically.
- Provides a general overview of the ePOC process, and describes the process for requesting access and enrolling in ePOC webinar training.

The Centers for Medicare and Medicaid Services (CMS) implemented an online ePOC web based application, which allows providers to receive their CMS-2567s and submit their POCs electronically. This software application is accessible by providers, the California Department of Public Health (CDPH), Licensing and Certification Program (L&C), the CMS Regional Office (RO) and the CMS Central Office (CO).

Pursuant to 42 CFR section 488.402(d), all federally certified skilled nursing facilities, and nursing facilities (SNFs/NFs) must submit a POC to L&C upon issuance of a deficiency(s). ASPEN Web: ePOC will streamline the POC submission, review, correction, and approval process by allowing information to be passed between providers and L&C electronically. CDPH is seeking 100 percent participation by SNFs/NFs.

**Overview of the ePOC Review and Submission Process**

1. The ePOC life cycle begins with L&C or the CMS Regional Office (RO) completing a survey or investigation and documenting their findings on the CMS-2567.
2. L&C/RO then posts the CMS-2567 and any appropriate letter(s) on the ePOC web application.
3. The ePOC will generate an email notifying all ePOC registered users at the facility as well as designated DO staff, that the CMS-2567 has been posted. Emails will replace paper-based communications between ePOC participants and L&C/RO.
4. L&C/RO may post the following types of SNF/NF surveys:
  - Health or Life Safety Code surveys
  - Federal, state or dual enforcement surveys
  - All survey types (e.g., certification, licensure, complaint investigations, etc.)
5. The provider reviews applicable letters and the CMS-2567 from the department.
6. The provider submits a POC response for each cited tag via ePOC within 10 calendar days of receipt of the email notification.
  - As SNFs/NFs develop the POC, SNFs/NFs will have the option of submitting the POC for all tags at once or by individual tag. However, providers choosing to submit POCs individually should submit POCs for tags of higher severity first.

- To submit the POC, providers will enter a POC "Completion Date," select the "Submit as Final" button, and electronically sign an "Attestation Statement."
  - Providers submitting POCs through ePOC do not need to submit a wet signature hard copy. The electronic signature provided on the "Attestation Statement" fulfills this requirement.  
**NOTE:** The ePOC application only requires providers to click an "Acknowledge" button in the Facility Response section for each of the following tags, as a POC response is not necessary:
    - Comment tags (0000 and 9999)
    - Past Non-Compliance (PNC) tags
    - A-Level Scope/Severity tags
7. L&C/RO reviews the POC for each deficient practice, and approves or disapproves each one.
- If L&C/RO rejects a POC, facility users receive an email notification listing the reasons for rejection. The facility then revises and re-submits the POC.
8. Upon L&C/RO approval of POCs for all deficiencies, facility users will receive a final approval email. L&C has developed and posted a list of frequently asked questions (Attachment A) to the CDPH ASPEN Web: ePOC informational webpage. The webpage also includes detailed provider registration instructions. Refer to the webpage for ongoing updates regarding the department's implementation of ePOC.

#### Electronic Plan of Correction

Sincerely,

**Original signed by Jean Iacino**

Jean Iacino  
Deputy Director

Attachments:

Frequently Asked Questions (Pending)  
ATT ePOC Workbook: refresher (Pending)  
ePOC Activation Schedule (Pending)

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