**Immediate Jeopardy (IJ) and Removal Plan Instructions**

**Surveyor Responsibilities:**

* If the survey team agrees that IJ exists, they will immediately notify the facility of the IJ by providing a completed IJ template. The survey team MUST complete a **preliminary IJ template** that includes identification of the **specific noncompliance**, threshold of seriousness and **need for immediate action**.
* Findings recorded on the IJ template are always preliminary. This includes any findings related to the IJ or to the completed IJ template that a survey team presents to the facility in the survey’s Exit Conference, regardless of whether the suspected IJ has been removed.

**Facility Steps:**

1. An Immediate Jeopardy removal plan must be developed instead of a Plan of Correction; however, it contains the same components as a Plan of Correction.
2. Initiate a Root Cause Analysis:

* Interviewing involved direct care staff and their immediate supervisors.
* Complete a Fishbone & Five Why’s

1. Necessary Changes:

* New or Changed Policies and Procedures based on Interviews, and the Five Why’s

1. Training:

* Persons to be trained
* Objectives
* Content
* Post Test

1. Supervision and Employee Performance Evaluation:

* Scheduled and Recorded Supervision –
* Who will supervise?
* Who will be supervised?
* When will supervision occur?
* What are expected behaviors?
* Scheduled and Recorded Evaluation –
* Who will evaluate?
* Who will be evaluated?
* What are expected outcomes/behaviors?
* When will evaluations occur?
* Are the new or changed structures and processes effective and efficient?

Demonstrate how the newly implemented actions will successfully eliminate the immediate threat of imminent harm by stating how the facility will regularly monitor in the short term (to establish compliance), and then, how long the facility will monitor periodically to monitor for sustained compliance. (Example: Audit new behavior every business day for two weeks, then one day per week for two weeks, then monthly for two months until 100% compliance is achieved.)

* If IJ is **not**removed during the survey and an IJ removal plan is submitted, this will include a report of completed activities to be submitted to QUAD A prior to the first (IJ removal) revisit survey.

**Immediate Jeopardy Reporting Template**

|  |  |  |
| --- | --- | --- |
| **IJ Component** | **Yes/No** | **Preliminary fact analysis which demonstrates when key component exists.** |
| Noncompliance: Has the facility failed to meet one or more federal health, safety, and/or quality regulations? If yes, in the blank space, identify the standard and briefly summarize the issues that lead to the determination that the facility is in noncompliance with the identified requirement. This includes the action(s), error(s), or lack of action, and the extent of the noncompliance (for example, number of cases). Use one IJ template for each standard being considered at IJ level. | Yes  No |  |
| **AND** | | |
| Serious injury, serious harm, serious impairment or death: Is there evidence that a serious adverse outcome occurred, or a serious adverse outcome is likely as a result of the identified noncompliance? If Yes, in the blank space, briefly summarize the serious adverse outcome, or likely serious adverse outcome to the recipient. | Yes  No |  |
| **AND** | | |
| Need for Immediate Action: Does the facility need to take immediate action to correct noncompliance that has caused or is likely to cause serious injury, serious harm, serious impairment, or death? If yes, in the blank space, briefly explain why. | Yes  No |  |

Date/Time IJ Removal Plan provided to facility:

|  |  |
| --- | --- |
| **IJ Removal Plan Elements** | **Removal Plan Response** |
| Identify those individuals who have suffered, or are likely to have suffer, a serious adverse outcome resulting from the noncompliance. |  |
| Specify the action(s) the facility will take to alter the process(es) or system failure to prevent a serious adverse outcome from occurring or recurring. |  |
| When the action will be complete. |  |