

Corrective Action Plan (CAP) Overview and Submission

**Office of Medicaid Services
2025–2026**



**SOUTH CAROLINA
DEPARTMENT OF EDUCATION**

What is a CAP?

- A corrective action plan (CAP) is a step-by-step plan of action that is developed to achieve targeted outcomes for resolution of identified deficiencies.
- A CAP consists of improvements to an organization's processes that are taken to eliminate the causes of deficiencies or other undesirable results/outcomes.



Why is a CAP needed?

A CAP is needed to:

- ensure compliance with state, federal, and local regulatory requirements.
- improve processes, procedures and/or methods
- increase effectiveness and efficiency
- control or eliminate deficient practices.
- prevent repeat actions/deficiencies.
- ensure the program continues to evolve effectively by correcting deficiencies which decreases chances of Medicaid recoupments.



Developing an Effective/Successful CAP

1. Select the appropriate/right corrective action team members:
 - Staff responsible for the oversight of Medicaid services or quality assurance.
 - Staff that will be implementing and carrying the changes or corrective action(s).
2. Examine the issue:
 - Identify all errors and deficiencies.
 - Get an understanding of the underlying cause of the problems and issues:
 - Review your quality guidelines or standard operating procedures in place.
 - When you get to the core issue, you may find that a solution will present itself.

3. Plan The Process
 - Once you thoroughly understand the problem and issues, you can begin planning the process for improvement:
 - Brainstorm corrective actions for each error or deficiency.
 - Identify the best solution or remedy.
 - Document your solutions.
4. Write the Corrective Action Plan.



What is expected to be included in a CAP?

The CAP must include the following components to be successful:

- The problem being addressed
- The solution for improvement (i.e., the action to be carried out)
- Specific procedures put in place to address the problem
- Formal documentation of policy and procedure changes
- Team and individual responsibilities



Problematic CAP Response Example

Deficiency: There is not a signed (electronically or handwritten) Consent to Treat by the student's parent or guardian consenting to treatment.

Corrective Action: The student's parent has been sent a consent to sign, and we are awaiting return of the consent to begin billing.

What is the problem here?

- The solution for improvement (i.e., action to be carried out) is not present.
- Specific procedures put in place to address the problem are not present.
- Formal documentation of policy and procedure changes are not present.
- Documentation to support changes, if applicable, are not present.
- Team and individual responsibilities are not present.



Appropriate CAP Response Example

Deficiency: There is not a signed (electronically or handwritten) Consent to Treat by the student's parent or guardian consenting to treatment.

Corrective Action:

- The student's parent has been sent a consent form to sign.
- Because there was not a Consent to Treat in place during the review period all claims submitted to Medicaid during that time will be voided.
- The district has implemented a checklist to be utilized by the Medicaid biller and completed for each student prior to billing Medicaid each year.
- The checklist ensures that all required documents are signed and in the record prior to billing. District policy has been updated to reflect that the checklist must be completed for each student prior to billing.
- The updated checklist and policy has been uploaded.

The following have been addressed in the CAP response:

- The problem you are addressing
- The solution for improvement (i.e., action to be carried out)
- Specific procedures put in place to address the problem
- Formal documentation of policy and procedure changes
- Documentation to support changes
- Team and individual responsibilities



CAP Submission

- A CAP must be submitted specific to each deficiency/finding identified in the district's report.
- Once the district has accepted the follow-up report via the Quality Assurance (QA) application, the district can complete and submit the CAP to address the findings/deficiencies of the review.
- The CAP must be submitted within 30 calendar days from the date that the follow-up report is accepted within the QA application.
- The Education Associate (EA) will respond to the CAP with any questions, comments, or concerns—the district will have the opportunity to respond.
- The CAP must include a date of implementation. Proof of implementation must be uploaded to the QA application, if completed.



Five Areas of the CAP in the QA Application

- Summary
- Discrepancies
- Recommendations
- Comments
- Completion



CAP Submission via QA Application—Summary

The Summary tab will show the checklist type, question number, discrepancy, and date of implementation pulled from the discrepancy tab.

South Carolina Department of Education: Medicaid Quality Assurance

Application Portal Logout

CAP - Details

districttestuser@gmail.com

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Corrective Action Plan (CAP) - Details

District: Greenville

Review Year: 2023-2024

CAP Due Date: 09/08/2023

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section I: Summary

Checklist	Number	Discrepancy	Implemented
School District Administrative Claiming (SDAC)	1.1	Did the SDAC Coordinator complete annual SDAC training?	08/06/2023



CAP Submission via QA Application—Discrepancies

- This screen will display the deficiencies that must be addressed by the district with a CAP.
- The deficiencies are listed by checklist type, question number, and a description of the deficiency.
- On the right side of the screen, you will see two buttons, “Edit” and “Upload Document Proof”.
- If the district must make edits, click the “Edit” button.
- If the district has implemented their CAP, proof of implementation must be uploaded.

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CAP - Discrepancies List

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Corrective Action Plan (CAP) - Discrepancies List

District: Greenville

Review Year: 2023-2024

CAP Due Date: 09/08/2023

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section II: Discrepancies

Checklist	Question	Discrepancy	Implemented
School District Administrative Claiming (SDAC)	1.1	Susan Jones: The SDAC Coordinator did not receive training during the review year.	Edit Upload Document Proof
		Sylvia Tutt: The SDAC Coordinator received training but it was not annually. Training was completed in 2020.	

Proof of Implementation

Number	Document	Discrepancy Addressed
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CAP Submission via QA Application—Discrepancies (Cont.)

- The “Edit” button will open the field where the planned corrective action will be entered.
- On the bottom left side of the screen there is a field to enter the date of implementation. This is the date the district will implement the CAP.

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Corrective Action Plan (CAP) - Discrepancies List

District: Greenville

Review Year: 2023-2024

CAP Due Date: 09/08/2023

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section II: Discrepancies

Checklist	Question	Discrepancy	Implemented
School District Administrative Claiming (SDAC)	1.1	Susan Jones: The SDAC Coordinator did not receive training during the review year.	Edit Upload Document Proof
		Sylvia Tutt: The SDAC Coordinator received training but it was not annually. Training was completed in 2020.	

Proof of Implementation

Number	Document	Discrepancy Addressed
--------	----------	-----------------------



CAP Submission via QA Application—Discrepancies CAP Entry

- This screen is a sample of a CAP entry.
- The corrective action plan and implementation date are entered and displayed on the screen.
- Remember to save every entry.
- A corrective action plan must be entered for each discrepancy.

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Application Portal Logout

CAP Discrepancies - Edit districttestuser@gmail.com

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Discrepancies - Edit

District: Greenville Review Year: 2023-2024

Discrepancy

Discrepancy: 1
School District Administrative Claiming (SDAC) 1.1: Sylvia Tutt, Susan Jones

District Response

Corrective Action Plan

A calendar reminder has been set for two weeks prior to the school start date to train all new users on the SDAC program and obtain signed attestation form.

1844 Characters remaining

Date Implemented
08-07-2023

Save Back



CAP Submission via QA Application—Date of Implementation

- Once entries are saved, the date of implementation will display.
- The option to Edit and/or Upload Proof of Implementation will be available prior to submitting the CAP.

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CAP - Discrepancies List

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Corrective Action Plan (CAP) - Discrepancies List

District: GreenvilleReview Year: 2023-2024CAP Due Date: 09/08/2023

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section II: Discrepancies

Successfully updated the district's Action Taken and date implemented for the selected discrepancy.

Checklist	Question	Discrepancy	Implemented	
School District Administrative Claiming (SDAC)	1.1	Susan Jones: The SDAC Coordinator did not receive training during the review year.	08/06/2023	EditUpload Document Proof
		Sylvia Tutt: The SDAC Coordinator received training but it was not annually. Training was completed in 2020.		

Proof of Implementation

Number	Document	Discrepancy Addressed
--------	----------	-----------------------



CAP Submission via QA Application—File Upload

When you click the upload document proof button, the application displays the “Choose Files” button to upload documentation.

The screenshot displays the 'South Carolina Department of Education: Medicaid Quality Assurance' application portal. The page title is 'Proof of Implementation - Upload Document'. The user is logged in as 'districttestuser@gmail.com'. The page shows the following details:

- District:** Greenville
- Review Year:** 2023-2024
- Upload Proof of Implementation:** A section with a 'Choose Files' button and the text 'No file chosen'.
- District Response:** A section with a 'Discrepancy Addressed' field containing the text 'School District Administrative Claiming (SDAC) 1.1: Sylvia Tutt, Susan Jones'.
- Buttons:** 'Save' and 'Back' buttons at the bottom.

The left sidebar contains the following navigation links: Home, Review Schedule, ISA, Document Upload, Follow-Up, CAP, Summary, Discrepancies, Recommendations, Comments, and Completion.



CAP Submission via QA Application—File Upload (Cont.)

- Once you upload the document, the name of the file now displays on the screen.
- Remember to save.

The screenshot displays the 'South Carolina Department of Education: Medicaid Quality Assurance' application portal. The page title is 'Proof of Implementation - Upload Document'. The user is logged in as 'districttestuser@gmail.com'. The left sidebar contains a navigation menu with the following items: Home, Review Schedule, ISA, Document Upload, Follow-Up, CAP, Summary, Discrepancies, Recommendations, Comments, and Completion. The main content area shows the 'Proof of Implementation - Upload Document' form. It includes a header with 'District: Greenville' and 'Review Year: 2023-2024'. Below this is the 'Upload Proof of Implementation' section, which has a 'Choose Files' button and a text field containing 'Testing Upl...ument .docx'. The 'District Response' section is also visible, with a 'Discrepancy Addressed' field containing a table with two columns and two rows. The table content is as follows:

Discrepancy	Addressed
School District Administrative Claiming (SDAC) 1.1: Sylvia Tutt, Susan Jones	

At the bottom of the form, there are 'Save' and 'Back' buttons.



CAP Submission via QA Application—File Upload Saved

After uploads are saved, the system will display the name of the document uploaded as proof of implementation of the CAP.

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CAP - Discrepancies List

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Corrective Action Plan (CAP) - Discrepancies List

District: GreenvilleReview Year: 2023-2024CAP Due Date: 09/08/2023

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section II: Discrepancies

Checklist	Question	Discrepancy	Implemented	
School District Administrative Claiming (SDAC)	1.1	Susan Jones: The SDAC Coordinator did not receive training during the review year.	08/06/2023	EditUpload Document Proof
		Sylvia Tutt: The SDAC Coordinator received training but it was not annually. Training was completed in 2020.		

Document uploaded successfully.

Proof of Implementation

Number	Document	Discrepancy Addressed
1	Testing Upload Document .docx	School District Administrative Claiming (SDAC) 1.1: Sylvia Tutt, Susan Jones



CAP Submission via QA Application—Recommendations

- The recommendations tab is where you enter the action taken to address the recommendation made by the reviewer.
- Click the “Edit” button on the right to start working this tab.

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CAP - Recommendations List

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Corrective Action Plan (CAP) - Recommendations List

District: Greenville

Review Year: 2023-2024

CAP Due Date: 09/08/2023

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section III: Recommendations

Number	Recommendation(s)	Action Taken
1	Complete SDAC training annually.	Edit



CAP Submission via QA Application—District's Response to Recommendations

- Once you click “Save”, the application will bring you to this screen.
- The system saved and now displays your entry.
- If there are errors, you will have editing capability prior to submission.

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CAP - Recommendations List districttestuser@gmail.com

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Corrective Action Plan (CAP) - Recommendations List

District: Greenville Review Year: 2023-2024 CAP Due Date: 09/08/2023

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section III: Recommendations

Number	Recommendation(s)	Action Taken	Edit
1	Complete SDAC training annually.	The district has put measures in place to ensure annual training.	Edit



CAP Submission via QA Application—Comments

- Next is the “Comments” tab.
- Entering comments on this tab is not mandatory; however, encouraged by the OMS.
- Click the “Create New” button to enter comments.

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CAP - Comments List districttestuser@gmail.com

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Corrective Action Plan (CAP) - Comments List

District: Greenville Review Year: 2023-2024 CAP Due Date: 09/08/2023

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section V: Comments

Create New

Successfully updated the district's Action Taken for the selected recommendation.

Entered By	Date Entered
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CAP Submission via QA Application—District Comments

- Once you click “Create New”, the application will open the field where comments may be entered.
- Upon completion of entering your comments click Save.
- The district may enter more than one comment if needed.

The screenshot displays the 'Comments - Create' interface within the South Carolina Department of Education's Medicaid Quality Assurance application portal. The top header bar is teal and contains the text 'South Carolina Department of Education: Medicaid Quality Assurance' on the left, and 'Application Portal' and 'Logout' on the right. Below the header, a light green bar shows 'Comments - Create' on the left and a user profile icon with the email 'districttestuser@gmail.com' on the right. A left-hand navigation menu lists several options: Home, Review Schedule, ISA, Document Upload, Follow-Up, CAP, Summary, Discrepancies, Recommendations, Comments, and Completion. The main content area is titled 'Comments - Create' and features a form with a 'District:' label and a 'Review Year: 2023-2024' label. Below these is a 'District Comment' section with a text area containing the text 'The district appreciates the feedback.' and a character count '1962 Characters remaining:'. At the bottom of the form are 'Save' and 'Back' buttons.



CAP Submission via QA Application—District Comments (Cont.)

- The application will now bring you to the screen that will display the comment entered.
- You will see highlighted confirmation that the comment was successfully added, the entered comment, who entered the comment, and the date of entry.

The screenshot displays the 'CAP - Comments List' interface within the 'South Carolina Department of Education: Medicaid Quality Assurance' application. The top navigation bar includes 'Application Portal' and 'Logout' links. The user is logged in as 'districttestuser@gmail.com'. The left sidebar contains a menu with options: Home, Review Schedule, ISA, Document Upload, Follow-Up, CAP (highlighted), Summary, Discrepancies, Recommendations, Comments (highlighted), and Completion. The main content area is titled 'Corrective Action Plan (CAP) - Comments List'. It shows the 'District: Greenville', 'Review Year: 2023-2024', and 'CAP Due Date: 09/08/2023'. A blue informational box states: 'Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.' Under 'Section V: Comments', there is a 'Create New' button and a confirmation message: 'Successfully added a new comment to the CAP.' Below this, a table displays the added comment:

	Entered By	Date Entered
The district appreciates the feedback.	districttestuser@gmail.com	08/10/2023 02:26



CAP Submission via QA Application—Completion Boxes

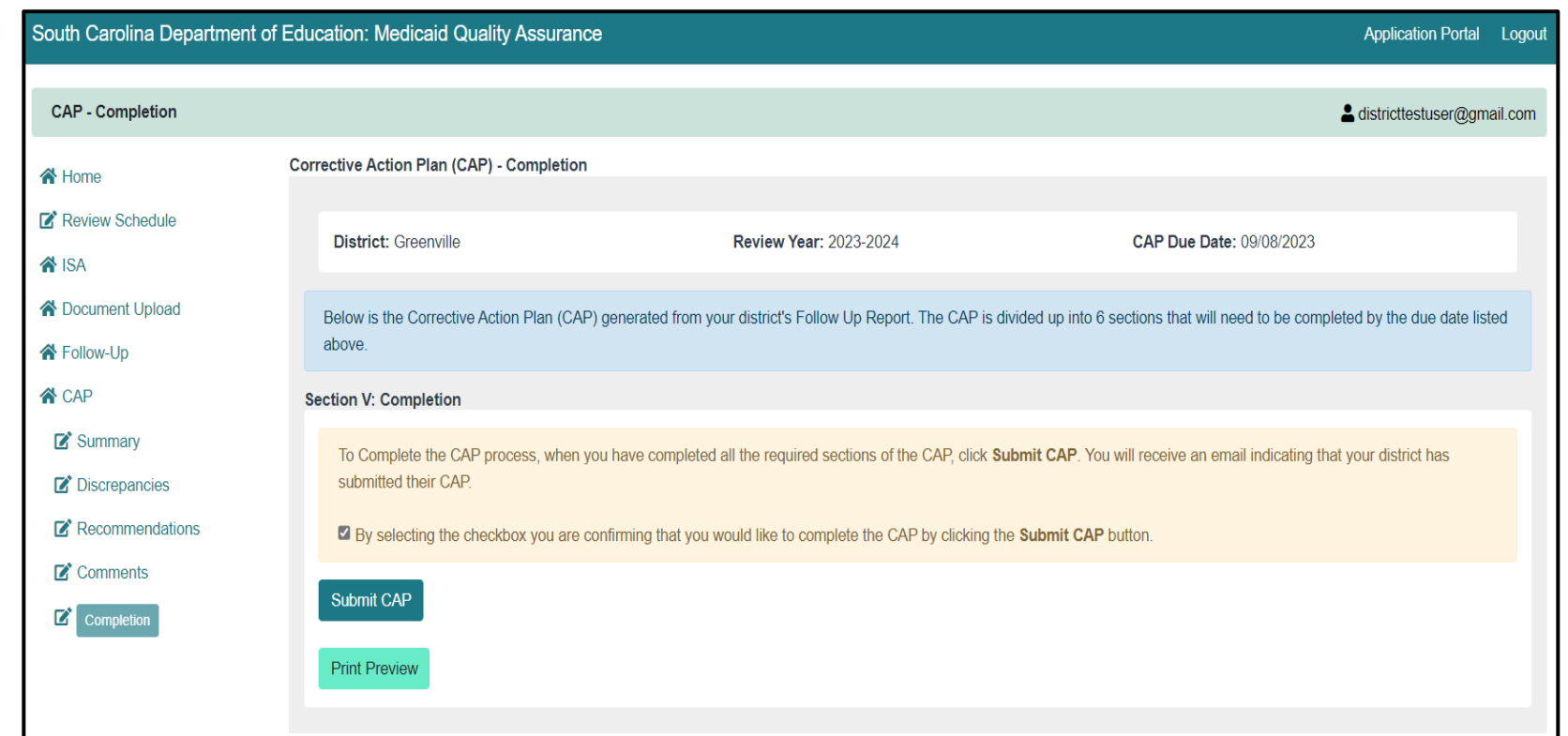
- The CAP completion tab is the last tab to be completed.
- All required entries for the CAP are complete and the CAP is ready for submission.
- Notice the yellow text box. The box must be checked for the submission to take place.
- You may print preview the CAP before submitting. If the yellow box is not checked, the CAP won't submit.

The screenshot displays the 'South Carolina Department of Education: Medicaid Quality Assurance' application portal. The top navigation bar includes 'Application Portal' and 'Logout'. The user is logged in as 'districttestuser@gmail.com'. The main heading is 'CAP - Completion'. A sidebar on the left lists navigation options: Home, Review Schedule, ISA, Document Upload, Follow-Up, CAP (selected), Summary, Discrepancies, Recommendations, Comments, and Completion. The main content area is titled 'Corrective Action Plan (CAP) - Completion'. It shows 'District: Greenville', 'Review Year: 2023-2024', and 'CAP Due Date: 09/08/2023'. A blue informational box states: 'Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.' Below this, a yellow box titled 'Section V: Completion' contains the text: 'To Complete the CAP process, when you have completed all the required sections of the CAP, click **Submit CAP**. You will receive an email indicating that your district has submitted their CAP.' It also includes a checkbox: 'By selecting the checkbox you are confirming that you would like to complete the CAP by clicking the **Submit CAP** button.' At the bottom of the yellow box are two buttons: 'Submit CAP' and 'Print Preview'.



CAP Submission via QA Application—Submission

- On this screen you will see the box with a checkmark to confirm the CAP is completed and ready for submission.
- The CAP will be submitted by clicking the “Submit CAP” button.



The screenshot displays the 'South Carolina Department of Education: Medicaid Quality Assurance' application portal. The user is logged in as 'districttestuser@gmail.com'. The main heading is 'CAP - Completion'. A sidebar on the left contains navigation links: Home, Review Schedule, ISA, Document Upload, Follow-Up, CAP, Summary, Discrepancies, Recommendations, Comments, and Completion (which is highlighted). The main content area is titled 'Corrective Action Plan (CAP) - Completion'. It shows 'District: Greenville', 'Review Year: 2023-2024', and 'CAP Due Date: 09/08/2023'. A blue box contains the text: 'Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.' Below this, a yellow box titled 'Section V: Completion' contains the instruction: 'To Complete the CAP process, when you have completed all the required sections of the CAP, click **Submit CAP**. You will receive an email indicating that your district has submitted their CAP.' There is a checked checkbox with the text: 'By selecting the checkbox you are confirming that you would like to complete the CAP by clicking the **Submit CAP** button.' At the bottom of the yellow box are two buttons: 'Submit CAP' (dark blue) and 'Print Preview' (light green).



CAP Submission via QA Application—Submission (Cont.)

- The field in green on the top of the screen confirms the date submitted and the name of the staff that submitted the CAP.
- At this stage, the option to print a copy of the CAP is still available.

South Carolina Department of Education: Medicaid Quality Assurance

Application Portal Logout

CAP - Completion districttestuser@gmail.com

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Corrective Action Plan (CAP) - Completion

District: Greenville Review Year: 2023-2024 CAP Due Date: 09/08/2023
Date Submitted: 08/10/2023 02:29:10 Submitted By: districttestuser@gmail.com Title:

Below is the Corrective Action Plan (CAP) generated from your district's Follow Up Report. The CAP is divided up into 6 sections that will need to be completed by the due date listed above.

Section V: Completion

To Complete the CAP process, when you have completed all the required sections of the CAP, click **Submit CAP**. You will receive an email indicating that your district has submitted their CAP.

☒ By selecting the checkbox you are confirming that you would like to complete the CAP by clicking the **Submit CAP** button.

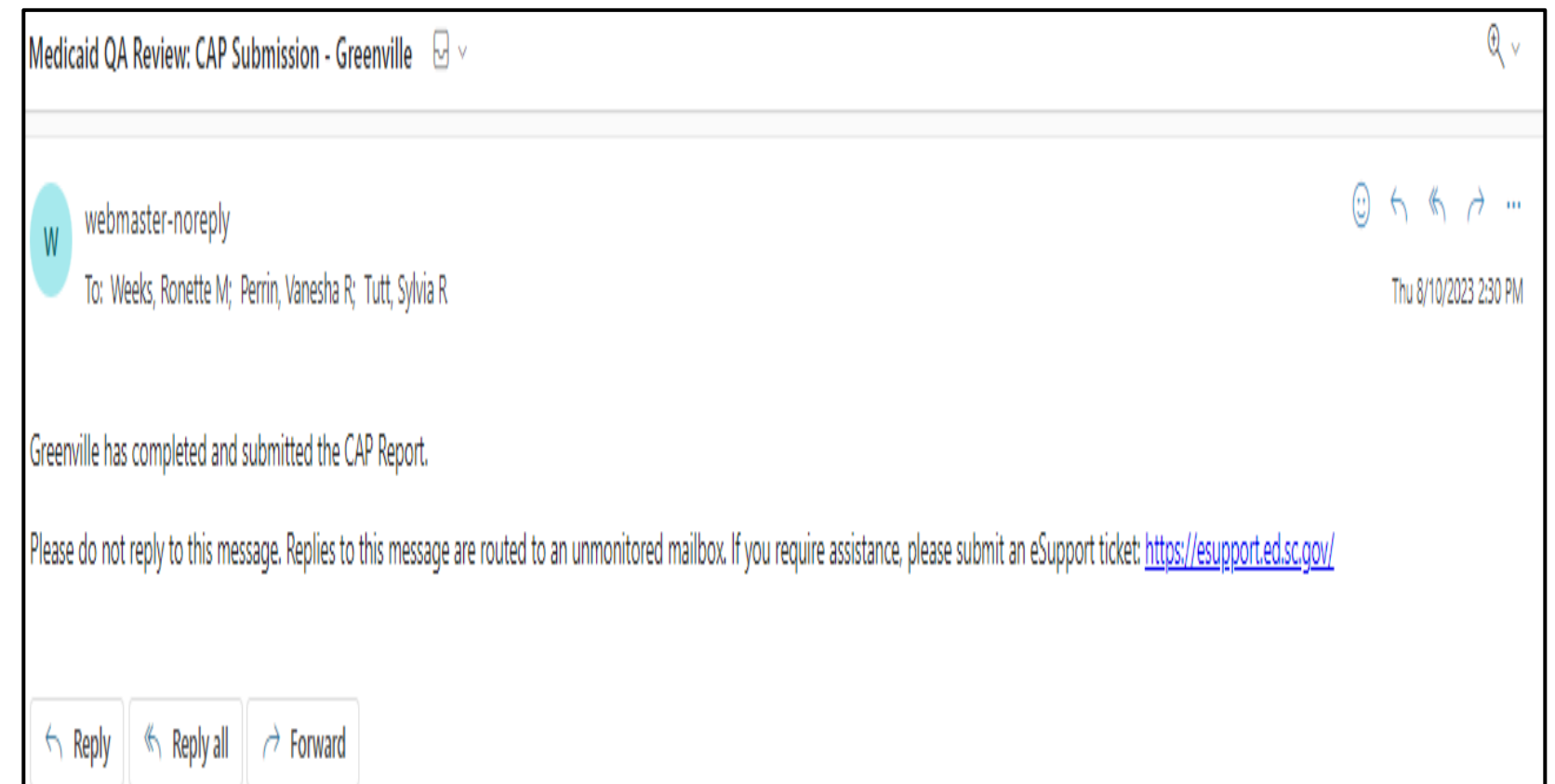
Submit CAP

Print Preview



CAP Submission via QA Application—Completion Notification

- The QA application will generate an email to the OMS alerting that the district submitted the CAP.
- The CAP will go to the assigned EA only and the district should reach out to the EA with any questions.



CAP Submission via QA Application—Sample of Printed CAP Report

- This is an example of how the district’s printed CAP will look.
- Districts are encouraged to print a copy of the CAP for their record.

Corrective Action Plan (CAP)

District: Greenville
Review Year: 2023 - 2024
CAP Due Date: 9/8/2023 12:00:00 AM

Office of Medicaid Services

08/10/2023

Section I: Summary

Checklist	Number	Discrepancy	Implemented
School District Administrative Claiming (SDAC)	1.1	A calendar reminder has been set for two weeks prior to the school start date to train all new users on the SDAC program and obtain signed attestation form.	8/6/2023 12:00:00 AM

Section II: Discrepancies

Number	Discrepancy	Implemented
1	School District Administrative Claiming (SDAC), 1.1, Tutt, Sylvia , The SDAC Coordinator received training but it was not annually. Training was completed in 2020.	8/6/2023 12:00:00 AM
2	School District Administrative Claiming (SDAC), 1.1, Jones, Susan, The SDAC Coordinator did not receive training during the review year.	8/6/2023 12:00:00 AM

Section III: Proof of Implementation

Number	Document	Discrepancy Text
1	Testing Upload Document .docx	School District Administrative Claiming (SDAC) 1.1: Sylvia Tutt, Susan Jones

Section IV: Recommendations

Number	Recommendation(s)	Action Taken
1	Complete SDAC training annually.	The district has put measures in place to ensure annual training.

Section V: Comments

	Entered By	Date Entered
The district appreciates the feedback.	districttestuser@gmail.com	8/10/2023 2:26:41 PM





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