LeadingAge Midwest
Illinois · Iowa · Missouri

Past Non-Compliance Template

The Centers for Medicare & Medicaid Services (CMS) identifies past noncompliance (PNC) in the State Operations Manual (SOM) as a deficiency citation at a specific survey data tag that was not in compliance with a specific tag at the time the incident occurred, occurred after the exit date of the last standard (recertification) survey (standard, compliance, revisit), and there is sufficient evidence that the nursing home corrected the noncompliance and is in substantial compliance at the time of the current survey. This template may help providers with documenting evidence of PNC.

1. Regulation and/or rule PNC relates to: _____

2. Describe non-compliance, include dates as appropriate:
   _____
   _____
   _____
   _____

3. Extent of resident injuries based on the non-compliance. If injuries are present include resident, injury or adverse event, date, and treatment. Include possible psychosocial harm as an indicator of injury.
   _____
   _____
   _____

4. Identified root cause of the noncompliance: _____

5. What steps were taken to correct the noncompliance, including implementation dates as appropriate:
   _____
   _____
   _____
   _____

6. Summarize follow-up monitoring to verify sustained compliance:
   _____
   _____
   _____

Substantial compliance achieved on: _____ (date)

Signature: _____ Title: _____

Date Form Completed: _____