Disputing Deficiencies or Non-approval of your POC

- **Disputing Deficiencies:** You may dispute a deficient finding(s) detailed in your Inspection Report. This can be done by raising specific objections to the Commission in writing within 14 days of receiving your Inspection Report.
  - You will receive a letter within 14 days of that objection, stating the Commission reviewed your objections, the Commission’s determination on those objections, and next steps for your pharmacy to take.

- **Disputing POC Inadequacy:** You may dispute the finding that your POC was inadequate. This can be done by raising specific objections in writing to the Commission within 14 days of receiving your non-approval letter.
  - You will receive a letter within 14 days of that objection, stating the Commission reviewed your objections, the Commission’s determination on those objections, and next steps for your pharmacy to take.

Questions?
Please review the cited regulation first. If you need clarification, or have questions about deficiencies you must contact the pharmacist investigator who conducted the onsite inspection, or you may contact the supervising pharmacist investigator.

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**Checklist**

Before submitting your plan of correction, please use the checklist below to prevent delays.

- Have you provided a plan of correction for each deficiency listed?
- Does each plan of correction show a completion date of when the deficiency will be corrected?
- Is each plan descriptive as to how the correction will be accomplished?
- Have you indicated what staff position will monitor the correction of each deficiency?
- Has the Pharmacist in Charge or another authorized official signed and dated the first page of the Statement of Deficiencies?
- If you included any attachments, have they been identified with the corresponding deficiency number or identified with the page number to which they are associated?

Your plan of correction will be returned to you for proper completion if not filled out according to these guidelines. Note: Failure to submit an acceptable plan of correction may result in enforcement action against the pharmacy.

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**Inspection Report with Noted Deficiencies**

**Plan of Correction**

**Instructions Regarding the Submission of a Plan of Correction (POC) to the Pharmacy Quality Assurance Commission**

Washington State Department of Health
Pharmacy Quality Assurance Commission
PO Box 47852, Olympia, WA 98504-7852
FAX (360) 236-2260

DOH 690-320 February 2019
Introduction
Pharmacist investigators from the Washington State Department of Health (DOH) recently conducted an inspection at your pharmacy. A list of deficiencies found by the pharmacy investigator is on the Inspection Report provided separately.

We require that you submit a plan of correction for each deficiency listed on the inspection report form. Your plan of correction must be submitted to the DOH within fourteen calendar days of receipt of the list of deficiencies.

Inspection Report with Noted Deficiencies: is the basic document available to the public about your pharmacy firm’s deficiencies.

Submitting Your Plan of Correction
Pharmacies are required to respond to the Inspection Report with Noted Deficiencies by submitting a plan of correction (POC). Be sure to refer to the deficiency number. If you include exhibits, identify them (e.g., Exhibit A) and refer to them as such in your POC.

Descriptive Content
Your plan of correction must provide a step-by-step description of the methods to correct each deficient practice to prevent recurrence and provide information that ensures the intent of the regulation is met.

An acceptable plan of correction must contain the following elements:

- The plan of correcting the specific deficiency;
- The procedure for implementing the acceptable plan of correction for the specific deficiency cited;
- The monitoring procedure to ensure that the plan of correction is effective and that specific deficiency cited remains corrected and/or in compliance with the regulatory requirements;
- The title of the person responsible for implementing the acceptable plan of correction.

Simply stating that a deficiency has been "corrected" is not acceptable. If a deficiency has already been corrected, the plan of correction must include the following:

- How the deficiency was corrected,
- The completion date (date the correction was accomplished),
- How the plan of correction will prevent possible recurrence of the deficiency.

Completion Dates
The POC must include a completion date that is realistic and coinciding with the amount of time your facility will need to correct the deficiency. Direct care issues must be corrected immediately and monitored appropriately. Some deficiencies may require a staged plan to accomplish total correction. Deficiencies that require bids, remodeling, replacement of equipment, etc., may need more time to accomplish correction; the target completion date, however, should be within a reasonable and mutually agreeable time-frame.

Continued Monitoring
Each plan of correction must indicate the appropriate person, either by position or title, who will be responsible for monitoring the correction of the deficiency to prevent recurrence.

Signature and Date
It is only necessary to sign and date the first page of the statement of deficiency form. This must include the name, title of the administrator or other authorized official, and the date the document is signed.

Approval of POC
Your submitted POC will be reviewed for adequacy by DOH. If your POC does not adequately address the deficiencies in your Inspection Report you will be sent a letter detailing why your POC was not accepted. You may dispute the finding of inadequacy or you must submit a 2nd POC. If your 2nd POC is also found to be inadequate, the Commission may result in enforcement action.