

TOP NJ HCSF DEFICIENCIES-2025

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	Standard	Standard Content
①	NJAC.13	Client record components.
②	NJAC.11	The certified homemaker-home health aide only performs tasks: 1. That are evaluated/delegated by the Health Care Practitioner Supervisor/RN; OR 2. As directed by the Health Care Practitioner Supervisor
③	NJAC.4	The Health Care Practitioner Supervisor reviews the plan of care not less than once each 30-day period and more often if the client's care changes, condition, or needs of the client change, or other regulatory standards require otherwise.
④	NJCC.1	The Health Care Service Firm (HCSF) has a written Client Bill of Rights and a copy of A Consumer's Guide to Homemaker-Home Health Aide (CHHA) within 24 hours of start of care/service, unless a waiver is agreed to that the client receive this prior to provision of care/service. The HCSF protects and promotes the exercise of the client's rights.
⑤	NJHR.4	Certified Homemaker-Home Health Aide (CHHA) provides care/services under the supervision of a registered nurse include assistance with activities of daily living, reporting changes, and other supportive tasks.
⑥	NJIP.2	The HCSF staff use "standard precautions" while providing care, including hand hygiene, use of gloves, safe handling of equipment likely to be contaminated with body fluids, soiled items, sharp devices and other requirements per state law and regulation.
⑦	NJPS.1	Client records are maintained for each client receiving care from a skilled healthcare professional, include documentation of components in the standard.
⑧	NJPS.2	There is a plan of care for clients receiving skilled healthcare professional services from an employee of a Health Care Service Firm (HCSF), and is developed by an appropriate healthcare professional, in consultation with the client and includes the components in the standard. The written plan of care is signed and dated by the physician and is updated and reviewed at least every two months by physician, or as often as the client's condition requires.

Standard Domain Deficiency Analysis, Key Actions, and Performance Improvement Focus

The following is a structured analysis of the standards deficiencies organized into major domains. It identifies what each item is intended to accomplish and highlighted system-level issues these actions address. This gives you a clear, professional-quality evaluation suitable for Quality Assessment Performance Improvement (QAPI), compliance reviews, or internal performance improvement planning.

Documentation & Record Management

Analysis

Intended purpose of the standard

Accurate, complete, and timely documentation is foundational to regulatory compliance, continuity of care, risk mitigation, and defensible clinical practice. Deficiencies in documentation often signal deeper system issues such as inadequate training, inconsistent oversight, or unclear expectations.

System-level issues for assessment

- Lack of standardized documentation processes.
- Inconsistent staff understanding of regulatory documentation requirements.
- Insufficient oversight or feedback loops for documentation errors.
- Fragmented communication between clinical and administrative staff.

Key Actions

- Perform audits of client records to validate all components of the standard are present.
- Educate staff on documentation requirements and proper entries in the client record.
- Conduct periodic record reviews to ensure plan-of-care review every 30 days or more frequently with condition changes.
- Educate staff about documentation standards at orientation and ongoing.
- Ensure plan of care for skilled services meets all requirements.
- Conduct audits to validate tasks assigned are appropriate and documented as performed.

Performance Improvement Planning

- Develop a standardized documentation checklist aligned with regulatory requirements.
- Implement monthly documentation audits with scoring and trend analysis.
- Provide targeted remediation for staff with repeated documentation deficiencies.
- Integrate documentation competency validation into annual skills review.
- Use audit findings to refine policies, templates, and workflows.

Plan of Care (POC) Management & Care Coordination

Analysis

Intended purpose of the standard

The plan of care is the central clinical roadmap for client services. Deficiencies in POC review, delegation, and adherence create risks for unmet needs, inappropriate care, and regulatory noncompliance.

System-level issues for assessment

- Lack of structured interdisciplinary communication.
- Inconsistent POC updates when client condition changes.
- Gaps in delegation clarity between RNs and Aides.
- Insufficient supervisory oversight in the field.

Key Actions

- Perform periodic record reviews to ensure POC review at least every 30 days.
- Educate Aides on following the POC and reporting changes to the RN.
- Educate RNs on collaboration with Aides and revising the POC as needed.
- Conduct client record audits to ensure Aides follow the POC as assigned.
- Perform home supervisory visits to observe Aide adherence to the POC.

Performance Improvement Planning

- Implement a standardized POC review workflow with automated reminders.
- Create a structured RN–Aide communication protocol for reporting changes.
- Develop supervisory visit tools that include POC adherence validation.
- Track POC revision timeliness as a quality indicator.
- Provide case-based training on POC updates and delegation.

Client Rights & Regulatory Compliance

Analysis

Intended purpose of the standard

Client rights are a core regulatory requirement and a cornerstone of ethical care. Failure to provide required materials or protect rights exposes the organization to compliance risk and undermines client trust.

System-level issues for assessment

- Inconsistent onboarding processes for new clients.
- Lack of staff awareness of regulatory requirements.
- Absence of verification mechanisms for rights distribution.

Key Actions

- Educate staff that all clients must receive a Client Bill of Rights and CHHA Guide within 24 hours of start of care.
- Ensure all staff promote and protect the exercise of client rights.
- Conduct audits to ensure compliance with rights-related requirements.

Performance Improvement Planning

- Implement a standardized “Client Rights Packet” with a required signature page.
- Add rights verification to the start-of-care checklist.
- Conduct quarterly audits of client rights documentation.
- Integrate client rights education into orientation and annual training.

Delegation, Competency, & Staff Role Clarity

Analysis

Intended purpose of the standard

Clear delegation and role-appropriate task performance are essential for safe care delivery. Deficiencies in this domain often reflect inadequate training, unclear expectations, or weak supervisory oversight.

System-level issues for assessment

- Role confusion between licensed and unlicensed staff.
- Inconsistent delegation practices.
- Lack of structured competency validation.

Key Actions

- Educate Aides on performing tasks only as delegated or directed.
- Educate Aides on following the POC and communicating with the RN.
- Educate RNs on collaboration with Aides and revising the POC.
- Conduct supervisory visits to validate task performance.

Performance Improvement Planning

- Develop a delegation protocol outlining allowable tasks.
- Implement competency checklists for Aides with annual validation.
- Provide RN training on effective delegation and supervision.
- Track incidents of task-related noncompliance for trend analysis.

Infection Prevention & Standard Precautions

Analysis	Key Actions	Performance Improvement Planning
<u>Intended purpose of the standard</u> Infection control is a high-risk domain. Field staff must demonstrate consistent competency in standard precautions to protect clients and themselves.	<ul style="list-style-type: none">Conduct ongoing education and training related to standard precautions.Conduct routine field observation visits to validate compliance through return demonstration.	<ul style="list-style-type: none">Implement quarterly infection control refresher training.Use standardized observation tools during field visits.Track infection control deficiencies and provide targeted retraining.Incorporate infection control performance into annual evaluations.
<u>System-level issues for assessment</u> <ul style="list-style-type: none">Inconsistent infection control practices in the field.Lack of competency validation beyond initial orientation.Limited real-time observation of staff performance.		

Cross-Cutting Themes Across All Domains

1. Need for Standardization

Across documentation, POC management, client rights, and infection control, the organization lacks consistent processes, checklists, and verification mechanisms

2. Staff Education & Competency Gaps

Recurrent need for education suggests:

- Orientation may be insufficient
- Ongoing training is not reinforced
- Competency validation is inconsistent

3. Insufficient Oversight & Feedback Loops

Multiple domains require:

- More frequent audits
- Structured supervisory visits
- Clearer communication channels between field staff and supervisors

4. Communication & Coordination Challenges

Breakdowns between RNs, Aides, and administrative staff affect:

- POC updates.
- Documentation accuracy
- Delegation clarity

5. Compliance Risk Exposure

Deficiencies across domains indicate systemic vulnerabilities that could lead to:

- Survey citations.
- Client safety risks