



Summary Report on Quality Improvement Initiative Top Ten Most Frequently Cited Deficiencies

November 2018 – June 2018

Background:

Phase 2 of the federal Requirements of Participation (RoPs) for long-term care facilities became effective on November 28, 2017. In addition, the Centers for Medicare and Medicaid Services (CMS) implemented a new survey process for long-term care facilities on this date as well.

In March 2018, Mass Senior Care began a quality initiative project to identify the most frequently cited deficiencies in Massachusetts long-term care facilities to obtain a better understanding of the reasons for these deficiencies as well as identify trends.

Findings:

As of July 2018, Mass Senior Care has reviewed data posted to the CMS QCOR (www.qcor.cms.gov) website through 6/26/2018. Approximately 109 Statements of Deficiencies (CMS 2567) and over 350 individual FTag citations have been reviewed for both standard and complaint surveys to identify the top 10 most frequently cited deficiencies.

Top 10 Most Frequently Cited Deficiencies

- F656 Develop/Implement Comprehensive Care Plan***
- F689 Free of Accident Hazards/Supervision/Devices***
- F880 Infection Prevention & Control***
- F658 Services Provided Meet Professional Standards**
- F700 Bedrails**
- F609 Reporting of Alleged Violations**
- F842 Resident Records – Identifiable Information**
- F761 Label/Store Drugs and Biologicals***
- F812 Food Procurement, Store/Prepare/Serve Sanitary***
- F607 Develop/Implement Abuse/Neglect Policies**

***Among top 10 deficiencies nationally**

Of note: Many of the top 10 most frequently cited deficiencies were also included in the top 10 prior to the implementation of the RoPs and the new survey process. These FTags include:

- F656 Develop/Implement Comprehensive Care Plan (previously F282)**
- F689 Free of Accident Hazards/Supervision/Devices (previously F323)**
- F880 Infection Prevention & Control (previously F441)**
- F658 Services Provided Meet Professional Standards (previously F281)**
- F761 Label/Store Drugs and Biologicals (previously F431)**
- F812 Food Procurement, Store/Prepare/Serve Sanitary (previously F371)**

A Deeper Dive into the Top 10 Most Frequently Cited Deficiencies:

F656 Develop/Implement Comprehensive Care Plan

Deficiencies cited under F656 Develop/Implement Comprehensive Care Plan were either because the facility failed to develop an individualized comprehensive care plan or implement the comprehensive care plan.

Examples of citations under develop individualized care plans include:

- no care plan for specific issues documented in the clinical record – resident with dementia with behavioral disturbances; areas triggered by MDS including communication, falls, dental care, pressure ulcers, urinary incontinence; monitoring of cardiac pacemaker; end stage disease and end of life care; significant weight loss and nutritional status; specific Foley catheter type, size and size of retention balloon; dental care; use of restraints; pain management.

Examples of citations under implementation of the comprehensive care plan include:

- not following physician orders or following the care plan for – providing supervision during meals; air mattress settings; placement and functioning of alarms; call bell accessibility; fall interventions; diet restrictions; indwelling urinary catheter; enteral tube feedings; weights; wound care; 2-person transfers; use of mechanical lifts.

F689 Free of Accident Hazards/Supervision/Devices

F689 Free of Accidents Hazards/Supervision/Devices is frequently cited in conjunction with F656 Develop/Implement Comprehensive Care Plan. There is often resident injury associated with this citation.

Examples of citations for F689 include:

- Medication carts not locked or secured with medications left on top near residents that wander
- Fall prevention interventions not implemented including not using alarms per care plan; not checking for alarm functioning Elopement – wander guard not in place or not functioning; exit alarms not set
- Transfers – wrong size sling when using mechanical life; one staff attempting to transfer a resident when care planned for a two person transfer; not using gait belts
- Temperatures of hot liquids – excessive hot water temperatures in resident care areas; failing to check temperature of hot beverages before serving; heating liquids in the microwave; resident access to a coffee maker
- Storage of hazardous materials on unit – doors not closed or locked
- Staff leaving residents unsupervised in activity rooms, dining rooms and during toileting

F880 Infection Prevention & Control

Examples of citations for F880 include:

- Handwashing - before, between and after glove changes; during medication pass; during wound care; with food preparation and handling; housekeeping staff not changing gloves between rooms
- Foley catheter bags on the floor

- Personal Protective Equipment (PPE) with residents on precautions – staff exiting room with PPE on and discarding in hall; using equipment on residents with precautions and removing from room without cleaning; allowing visitors in rooms with residents on precautions without PPE; staff not using PPE at all for residents on precautions
- Infection Control policies and procedures – not following policy and procedure for PICC line dressings; not reviewing and annually updating infection control policy; not identifying community associated infections vs. HAI; no system for surveillance; not assessing staff for risk of TB or completing periodic screening; no detailed records of incidents and corrective actions related to infections.

F656 Services Provided Meet Professional Standards

Examples of citations for F656 Services Provided Meet Professional Standards include:

- Not providing care according to professional standards of practice – change in resident's condition not reported to physician and not transferred to the hospital for four days; resident found unresponsive and no Code Blue called and delay in starting CPR and calling 911;
- Medications – not following physicians orders for the administration of medications; not properly transcribing orders; not following policies and procedures for medication administration including rotating insulin injection sites, checking blood pressure or blood glucose prior to administering medications; resident not receiving medications upon return from the hospital; lack of documentation that medications were given; signing off on medications that were not given; borrowing medications from another resident
- Evaluation of outcomes of nursing interventions – pain management ineffective and physician not notified; no documentation that resident was assessed for effectiveness after pain medication administered; resident with low blood glucose given something to eat and blood glucose not rechecked or physician notified per facility policy.

F700 Bedrails

Examples of citations for F700 Bedrails include:

- No documentation in the clinical record regarding an attempt to use alternative measures
- Clinical assessments do not include assessment of resident risk of entrapment
- No documentation in the clinical record that the risks and benefits of bedrail use were reviewed with the resident or resident's representative
- No informed consent obtained prior to bedrail use
- Did not ensure bed dimensions appropriate for resident's size and weight
- Did not follow manufacturer's recommendations and specification
- No policy or procedure for resident assessment of risk for entrapment

F609 Reporting of Alleged Violations

Examples of citations for F609 Reporting of Alleged Violations include:

- Allegations of abuse not reported to DPH within two hours

- Staff not following facility policy and procedure which states to report “immediately” to administration
- Staff unaware of facility policy and/or two hour reporting requirement

F842 Resident Records – Identifiable Information

Citations for F842 Resident Records – Identifiable Information are all related to maintaining accurate clinical records. Examples of citations for F842 Resident Records – Identifiable Information include:

- Orders not transcribed correctly specifically with medications that resulted in medication errors
- Care provided without physician orders – oxygen, diabetic foot care
- Lack of documentation for resident with wound care; weekly skin checks; medication administration
- MDS not matching clinical documentation
- Physician orders or clinical record documentation did not match the MOLST- specifically face sheets, monthly order summary; physician progress notes
- Documentation that care was provided when it wasn’t – wound care, medication administration
- No hospice documentation; IDT notes not readily accessible
- Physician notes not readily accessible
- Pharmacist recommendations not in clinical record
- No SBAR or transfer referral for residents transferred to the hospital
- Incomplete informed consent

F76I Label/Store Drugs and Biologicals

Examples of citations for F76I Label/Store Drugs and Biologicals include:

- Expired medications in medication rooms and on medication carts
- Staff not observing resident taking meds and signing off on the MAR
- Multi-dose vials open and not labeled with date opened and date to discard
- Medication carts left unlocked
- Medications not stored under proper temperatures
- Medications stored in an open space accessible to non-clinical persons

F812 Food Procurement, Store/Prepare/Serve Sanitary

Citations for F812 Food Procurement, Store/Prepare/Serve Sanitary were related to poor sanitation and food handling practices. Examples of citations for F812 Food Procurement, Store/Prepare/Serve Sanitary include:

- Staff not following facility policy and procedures related to personal hygiene – not using hair restraints, beard covers
- Staff using contaminated gloves during food preparation and serving – gloved hands touching food carts and then touching food; plates and utensils; not washing hands between glove changes
- Food uncovered, undated, expired in refrigerators and storage areas
- Cleanliness of kitchens, nourishment kitchens, food carts
- Condition of dinnerware
- Dishwasher temperatures and sanitization – not following manufacturer’s recommendations; not documenting temperatures or using the correct sanitizer concentration

- Not testing food temperatures prior to service

F607 Develop/Implement Abuse/Neglect Policies

Citations for F607 Develop/Implement Abuse/Neglect Policies are specifically related to policy development and implementation of those policies. Examples of citations for F607 Develop/Implement Abuse/Neglect Policies include:

- Not following facility policy for suspending staff after allegations; reporting immediately to Administrator or DON; reporting to DPH; completing pre-employment screenings and validating licensure
- Policies did not contain information on use of social media including taking, keeping, and/or distributing photos and recordings without consent
- Incomplete investigations – not obtaining written statements from staff, interviewing witnesses, and other residents

Next Steps:

It is important to note that only approximately 25% of Massachusetts long-term facilities have been surveyed under the new RoPs and new survey process. Therefore, the top 10 deficiencies are a moving target and subject to change as more facilities go through the new survey process

Mass Senior Care will continue to review the CMS data including Statements of Deficiencies to identify the reasons behind the citations and identify trends. Mass Senior Care will prepare a report for members on a quarterly basis and identify areas for member education as it relates to the top 10 most frequently cited deficiencies for long-term care facilities in Massachusetts.