DEPARTMENT OF HEALTH AND HUMAN SERVICES CENTERS FOR MEDICARE & MEDICAID SERVICES

PRINTED:9/5/2014 FORM APPROVED OMB NO. 0938-0391

X3) DATE SURVEY (X1) PROVIDER / SUPPLIER STATEMENT OF (X2) MULTIPLE CONSTRUCTION COMPLETED DEFICIENCIES AND PLAN OF CORRECTION CLIA IDENNTIFICATION À. BUILDING B. WING ____ 02/20/2014 NUMBER 115714 NAME OF PROVIDER OF SUPPLIER STREET ADDRESS, CITY, STATE, ZIP NORTHRIDGE HEALTH AND REHABILITATION 100 MEDICAL CENTER DRIVE COMMERCE, GA 30529

For information on the nursing home's plan to correct this deficiency, please contact the nursing home or the state survey agency

SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY (X4) ID PREFIX TAG OR LSC IDENTIFYING INFORMATION

F 0224

Level of harm - Immediate jeopardy

Residents Affected - Few

Write and use policies that forbid mistreatment, neglect and abuse of residents and

theft of residents' property.
**NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDENTIALITY* Based on observation, clinical record review, staff interview, hospital ER Triage Record review, and facility Follow-Up Report review, the facility failed to prevent neglect by failing to ensure that the WanderGuard system, utilized by facility staff for the supervision of residents at risk for elopement/wandering behavior on the first floor Units B and C, provided alarm coverage which included a set of unlocked doors located in a first floor corridor which was accessible to Unit B and Unit C residents, and which exited the nursing facility into the adjoining hospital. This failure resulted in neglect by allowing the elopement of one (1) Unit B resident (#1), who was at risk for wandering/elopement and who utilized a WanderGuard bracelet, on the total survey sample of fourteen (14) residents. Resident #1, while wearing a WanderGuard bracelet, was able to access this unsecured first-floor corridor on 02/09/2014, pass through the unalarmed corridor doors, exit the nursing facility through this corridor enter the adjoining hospital and elone. Resident #1 then fell and bit a wanderouard braceter, was able to access this unsecured first-floor corridor on 02/09/2014, pass through the unalarmed corridor doors, exit the nursing facility through this corridor, enter the adjoining hospital and elope. Resident #1 then fell and hit his/her head on pavement, was taken to the hospital emergency room and found to have facial abrasions, a nasal laceration requiring sutures, a nasal fracture, and a fractured right knee cap. This resulted in a situation in which the facility's non-compliance with one or more requirements of participation had caused, or had the likelihood to cause, serious injury, harm, impairment or death to residents. The facility's Administrator and Director of Nursing were informed of the immediate jeopardy on February 18, 2014 at 9:30 a.m. The non-compliance related to the immediate jeopardy was identified to have existed on February 9, 2014 (the date Resident #1 eloped from the facility via a set of unlocked, unalarmed, and unsecured doors located within a corridor which lead from the nursing facility to the adjoining hospital), continued through February 18, 2014, and was removed on February 19, 2014. The facility implemented a credible allegation of jeopardy removal related to the immediate jeopardy on February 18, 2014. During an interview with the Administrator conducted on 02/14/2014 at 11:50 a.m., the Administrator acknowledged Resident #1's nursing facility elopement on 02/09/2014. The Administrator acknowledged that the unlocked corridor doors located in the corridor leading from the nursing facility to the hospital did not have a WanderGuard alarm, and it was thought that Resident #1 had gone through the unalarmed corridor doors, entered the hospital and exited through the front main entrance/exit doors of the hospital. An allegation of jeopardy removal was received on February 19, 2014. Based on the corrective plans which had been developed and implemented by the facility, the immediacy of the deficient practice was determined to have been removed on February 19 unavailable for training, as they reported to work. In-service materials and records were reviewed. Interviews were conducted with staff to ensure they were knowledgeable about the monitoring of residents requiring supervision related to the risk of elopement/wandering. Observations were made to assess staffs' performance of care and supervision of these residents. Findings include: Resident #1's Minimum Data Set assessment of 02/06/2014 documented [DIAGNOSES REDACTED]. Section C - Cognitive Patterns recorded a Brief Interview for Mental Status score of six (06), indicating severe cognitive impairment. Section E - Behavior documented that Resident #1 had exhibited wandering behavior, and a 01/31/2014 Physician's Interim Orders form specified a WanderGuard bracelet at all times. A Nurse's Notes (NN) entry of 02/09/2014 for the 7:00 a.m.-7:00 p.m. shift documented that Resident #1 was walking up and down the hallways requiring staff redirection, and that a.m.-7309 J.m. shift documented that at Resident #1 was warming up and down the halways requiring start retrieval, and that the resident had stated Which way is the way out? I need to get home. The NN documented that at around 3:45 p.m. on 02/09/2014, Resident #1 had been at an activity in the Day Room being assisted by a certified nursing assistant. However, a 02/09/2014, 5:00 p.m. NN documented that a facility nurse received a telephone call from a family member to inform her that Resident #1 had been found with injuries at the roadside, and that Emergency Medical Service (EMS) 911 had been called for hospital transport. The 02/09/2014 hospital ER Triage Record documented that Resident #1 had fallen onto pavement and hit his/her face and forehead. The 02/09/2014 hospital ED Nursing Record (EDNR) documented lacerations/abrasions to Resident HI's face, nose, and forehead, and that the resident had been found by a former neighbor in the highway close to the resident's former home. Resident #1's 02/09/2014 ED Discharge Instructions form documented a laceration repair and injuries which included nasal and right knee patella fractures. A 02/14/2014 facility Follow-Up Report (FR) for Resident #1 documented that Resident #1 was originally admitted to Unit E, a second floor unit, but was moved to first floor Unit B on 02/05/2014 at family request. This FR documented that at 3:45 p.m. on 02/09/2014, Resident #1 was in the Day Room in an activity being assisted by Certified Nursing Assistant (CNA) BB, who left Resident #1 in the Day Room around 4:05 p.m. This FR documented that Resident #1 then left the Day Room and eloped, sustaining a fall before reaching his/her former home located 0.83 mile from the facility. This FR documented Resident #1's hospital transfer after the elopement and fall, and documented treatment for [REDACTED]. During an observation of Unit B conducted on 02/14/2014 at 12:30 p.m. at the end of the B Hall of Unit B, a corridor turned to the right off of B Hall. Within this corridor which was directly accessible from Unit B, observation revealed a set of double doors which were not locked and did not have a WanderGuard alarm. The corridor within which these unalarmed double doors were located, and which originated at the end of the B Hall of nursing facility Unit B, continued into the hospital which adjoined the nursing facility, and terminated at the main entrance/exit doors located at the front of the hospital. A two lane street was observed to run in front of the hospital/nursing facility buildings. Interview with the Administrator conducted on 02/14/2014 at 11:50 a.m. revealed that Resident #1's former home, close to which the resident was found to have fallen after eloping on 02/09/2014, was located on this street which ran directly in front of the hospital/nursing home facilities. During an interview conducted on 02/14/2014 at 12:48 p.m., the DON stated that Resident #1's Unit B room had been located close to the set of unalarmed corridor doors. The DON stated that, based on investigation, the facility determined that on 02/09/2014, Resident #1 had walked down the corridor off of Unit B, passed through the unalarmed corridor doors, continued walking out of the nursing facility and exited out the front door of the hospital. Based on the above, despite the facility's system for supervision of residents at risk of wandering/elopement involving the use of WanderGuard alarm bracelets, and despite Resident #1 having severe cognitive mpairment and a known history of wandering requiring a WanderGuard bracelet for supervision, the facility neglected Resident #1 by failing to provide supervision, per the resident's WanderGuard device, to address the resident's risk of elopement. Instead, the facility failed to ensure the placement of a WanderGuard alarm on the set of unlocked double doors located in the corridor leading from Unit B, where Resident #1 resided, and continuing into the hospital located adjacent to the nursing facility. This allowed Resident #1, who utilized a WanderGuard bracelet, to exit through these unalarmed, unlocked corridor double doors without the knowledge of nursing facility staff, to exit through the hospital's front entrance/exit doors and elope from the facility, then to gain access to a street where he/she subsequently fell and

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE

TITLE

(X6) DATE

Any deficiency statement ending with an asterisk (*) denotes a deficiency which the institution may be excused from correcting providing it is determined that other safeguards provide sufficient protection to the patients. (See instructions.) Except for nursing homes, the findings stated above are disclosable 90 days following the date of survey whether or not a plan of correction is provided. For nursing homes, the above findings and plans of correction are disclosable 14 days following the date these documents are made available to the facility. If deficiencies are cited, an approved plan of correction is requisite to continued program participation.

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DEPARTMENT OF HEALTH AND HUMAN SERVICES CENTERS FOR MEDICARE & MEDICAID SERVICES

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			OMB NO. 0938-0391
DEFICIENCIES	(X1) PROVIDER / SUPPLIER / CLIA IDENNTIFICATION NUMBER 115714	A. BUILDING	(X3) DATE SURVEY COMPLETED 02/20/2014

NAME OF PROVIDER OF SUPPLIER

STREET ADDRESS, CITY, STATE, ZIP

NORTHRIDGE HEALTH AND REHABILITATION

100 MEDICAL CENTER DRIVE COMMERCE, GA 30529

For information on the nursing home's plan to correct this deficiency, please contact the nursing home or the state survey agency

SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY (X4) ID PREFIX TAG

F 0224

Level of harm - Immediate jeopardy

Residents Affected - Few

(continued... from page 1) sustained facial abrasions, a nasal laceration requiring sutures, a nasal fracture, and a fractured right knee cap. The immediate jeopardy was determined to have been removed on February 19, 2014, at which time the facility had presented and implemented a credible allegation of jeopardy removal with the following interventions: A. On February 9, 2014, after learning of Resident #1's elopement, the facility conducted a full resident audit to assure the presence of all residents. learning of Resident #1's elopement, the facility conducted a full resident audit to assure the presence of all residents.

B. On February 9, 2014, all doors exiting the nursing facility were checked to ensure the proper working order of the WanderGuard alarm system. All existing WanderGuard alarms were functioning properly. C. On February 9, 2014, a procedure was put into place by which a facility employee was placed at the doorway, located in the corridor leading from the nursing facility to the hospital, which was not equipped with a WanderGuard alarm. A scheduled was developed reflecting specific employees who were assigned to be in place at the unalarmed doorway, at specific times and continuously around the clock, until a WanderGuard alarm was installed on the doorway. D. On February 9, 2014, chart audits for all current facility residents were conducted to ensure that all residents who demonstrated a potential for elopement had been accurately identified by the facility. During these chart audits, no new residents were identified to have the potential for elopement. E. On February 9, 2014, Care Plan reviews were conducted for residents assessed to be at risk for elopement to ensure that a comprehensive approach to address this risk was in place. During these Care Plan reviews, no problems were elopement. E. On February 9, 2014, Care Plan reviews were conducted for residents assessed to be at risk for elopement to ensure that a comprehensive approach to address this risk was in place. During these Care Plan reviews, no problems were identified. F. On February 9, 2014, in addition to daily WanderGuard bracelet checks completed by the Activities Director which were in place prior to Resident #1's elopement, the facility implemented audits of the door alarms through the preventative maintenance program. The door alarms would be checked weekly, on each Tuesday, by the Maintenance Director, and these door alarm checks would be documented via computer data entry. The door alarm test would include a check of the power indicator light to ensure proper function, and also a check for battery condition. A sensor button was to be used to test each door alarm, with the alarm to sound when within six feet of an alarmed doorway. If a door alarm did not initially sound, the test was to be repeated with a different sensor button. Any deviation from full working order found during these weekly door alarm checks would be reported to the Administrator for immediate correction. The Administrator or DON would monitor the results of these weekly door alarm audits, conducted by the Maintenance Director, by reviewing the computer data entered as a result of the door alarm checks weekly for four (4) weeks, then monthly for three (3) months, then adata entered as a result of the door alarm checks weekly for four (4) weeks, then monthly for three (3) months, then quarterly thereafter. The results of these supervisory audits will be submitted to the Quality Assessment/Performance Improvement (QA/PI) Committee for their review. G. On February 9, 2014, the facility contacted the Medical Director to inform him of the elopement of Resident #1. Additionally, a meeting which consisted of some members of the QA/PI Committee, including the Administrator, DON, and Director of Maintenance, was held to review the elopement event and the actions which had been taken by the facility, and to identify any additional actions that were needed. H. On February 15, 2014, the had been taken by the facility, and to identify any additional actions that were needed. H. On February 15, 2014, the corridor doorway, which lead from the nursing facility to the hospital and which had previously lacked a WanderGuard alarm, was equipped with a WanderGuard alarm. I. On February 18, 2014, the facility continued to provide staff in-service training to facility staff, including licensed nurses, CNAs, and maintenance/housekeeping staff. This in-service training served to both reinforce current facility protocols involving the routine monitoring of residents having WanderGuard bracelet devices and also to provide staff training on newly-implemented protocols related to the facility's WanderGuard alarm system. As of February 18, 2014, 116 of the facility's total 118 employees had received this in-service training. The two (2) remaining staff members, who were on Family and Medical Leave Act leave at the time this in-service training was provided, will received the training upon their return to work. J. On February 18, 2014, the QA/PI Committee met to review the elopement received the training upon their return to work. J. On February 18, 2014, the QA/PI Committee met to review the elopement event involving Resident #1, to review the actions taken by the facility as of that date, and to review the monitoring systems put into place as a result of the elopement. The QA/PI Committee will review the results of WanderGuard bracelet monitoring and door alarm audits weekly for four (4) weeks, then monthly for three (3) months, then quarterly thereafter to ensure ongoing compliance with the systemic measures implemented to correct the identified issue and prevent recurrence. The information will be analyzed by the QA/PI Committee, and subsequent plans of correction will be developed and implemented as needed. This will be an ongoing process. Based on these corrective actions which had been developed and implemented by the facility as outlined above, the immediacy of the deficient practice was removed on February 19, 2014. However, the effectiveness of the corrective action plans could not be fully assessed to ensure ongoing application and However, the effectiveness of the corrective action plans could not be fully assessed to ensure ongoing application and completion. On February 9, 2014, the facility implemented a weekly audit of WanderGuard door alarms to be accomplished through the preventative maintenance program by the Maintenance Director. These weekly WanderGuard door alarm audits would check for the proper function of all facility WanderGuard door alarms, and were to be documented via computer data entry. However, these weekly WanderGuard door alarm audits had been initiated only on February 9, 2014, and had occurred only twice prior to the February 20, 2014 exit date of this complaint survey. Therefore, ongoing staff compliance with this newly implemented procedure involving routine, scheduled WanderGuard door alarm monitoring could not be entirely assessed at the time of survey completion, and will thus need future evaluation. Additionally, by February 18, 2014, the facility had completed in-service training for 116 of its 118 facility employees, to include licensed nurses, CNAs, and maintenance housekeeping staff regarding both existing and pawly implemented protocols involving the monitoring of maintenance/housekeeping staff, regarding both existing and newly-implemented protocols involving the monitoring of residents with WanderGuard bracelets and the WanderGuard alarm system. However, two (2) remaining staff members, who were on leave and had been unavailable for training, will need to receive this training upon returning to work, and this training will thus need future evaluation. Additionally, the QA/PI Committee was to include the review the results of WanderGuard bracelet monitoring and door alarm audits in future meetings, but the Committee had met on On February 18, 2014, only two (2) days prior to the February 20, 2014 exit date of this complaint survey, to begin this process. Thus, the QA/PI Committee's ongoing process of facility procedural oversight could not be evaluated at the time of survey completion. Therefore, the non-compliance continues, but the scope and severity is reduced to the D level.

F 0282

Level of harm - Immediate jeopardy

Residents Affected - Some

Provide care by qualified persons according to each resident's written plan of care.**NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDENTIALITY**

NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDENTIALITY

Based on observation, clinical record review, facility staff interview, hospital ED Nursing Record review, hospital ED Discharge Instructions review, and facility Follow-Up Report review, the facility failed to ensure resident supervision for elopement/wandering behavior, in accordance with the Care Plan which specified WanderGuard bracelet use to address elopement/wandering behavior, by failing to ensure that the WanderGuard system provided protection which included a set of double doors located in one (1) first floor corridor which was accessible to Unit B and Unit C residents, and which exited the nursing facility into an adjoining hospital facility. The failure of the facility to ensure WanderGuard alarm protection on the double doors contained within this unsecured corridor allowed this corridor to serve as an unsecured counter of exit for one (1) resident (#1) who eloned through this corridor allowed this corridor to serve as an unsecured the nursing facility into an adjoining hospital facility. The failure of the facility to ensure WanderGuard alarm protection on the double doors contained within this unsecured corridor allowed this corridor to serve as an unsecured route of exit for one (1) resident (#1) who eloped through this corridor, and as a potential unsecured route of exit for four (4) additional residents (#5, #11, #12, and #14), whose Care Plans specified the use of WanderGuard bracelets to address known elopement/wandering behavior, on the total survey sample of fourteen (14) residents. Resident #1 subsequently accessed this unsecured corridor on 02/09/2014 without the knowledge of facility staff, exited the facility through the corridor, and eloped through the adjoining hospital. Resident #1 traveled along a street for approximately one-half mile, fell on to the pavement, was taken to the hospital Emergency Department (ED), and was found to have facial abrasions, a nasal laceration requiring sutures, a nasal fracture, and a fractured right knee cap. This resulted in a situation in which the facility's non-compliance with one or more requirements of participation had caused, or had the likelihood to cause, serious injury, harm, impairment or death to residents. The facility's Administrator and Director of Nursing were informed of the immediate jeopardy on February 18, 2014 at 19:30 a.m. The non-compliance related to the immediate jeopardy was identified to have existed on February 9, 2014 (the date Resident #1 eloped from the facility via the unlocked, unalarmed, and unsecured doors located within a corridor which lead from the nursing facility to an adjoining hospital), continued through February 18, 2014, and was removed on February 18, 2014. During this survey, it was determined that Resident #1, who had a history of [REDACTED]. In addition to Resident #1, Resident #5, 11, 2, and 14, who all had cognitive impairment and whose Care Plans all specified the use of WanderGuard bracelets for known elopement/wandering behavior, also res removed on February 19, 2014, and the facility remained out of compliance at a lower scope and severity of E while the

FORM CMS-2567(02-99) Event ID: YL1O11 Facility ID: 115714 If continuation sheet Page 2 of 9 Previous Versions Obsolete

DEPARTMENT OF HEALTH CENTERS FOR MEDICARE			PRINTED:9/5/2014 FORM APPROVED OMB NO. 0938-0391
STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER / SUPPLIER / CLIA IDENNTIFICATION NUMBER	(X2) MULTIPLE CONSTRUCTION A. BUILDING B. WING	(X3) DATE SURVEY COMPLETED 02/20/2014
	115714		
NAME OF PROVIDER OF SU		STREET ADDRESS, CITY	. STATE, ZIP
NORTHRIDGE HEALTH A		100 MEDICAL CENTER COMMERCE, GA 30529	
For information on the nursing	home's plan to correct this deficien	icy, please contact the nursing home or the state survey agency.	
(X4) ID PREFIX TAG	1	DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDE	
F 0282 Level of harm - Immediate jeopardy Residents Affected - Some	OR LSC IDENTIFYING INFOR. (continued from page 2) facility completed a process whice procedural revisions made to ensembly procedural revisions made to ensembly of the procedural revisions made to ensembly of the procedural revisions made to ensembly of the provide in-service training to staff materials and records were review monitoring of residents requiring staffs' performance of care and staffoor conducted on 02/14/2014 at this tour revealed that the facility for elopement/wandering. A War front of the facility, and a Wander corridor which opened into a concorridor which turned off the end which connected the nursing facility's Unit B and Unit C adjoin of the wander Guard alarm. These door these unalarmed, unlocked doors and exited through the hospital's facility's Unit B and Unit C adjoin of both units to have access to this doors leading into the adjoining a cknowledged that the double do locked. 1. Resident #1's Minimur diagnoses, in Section I - Active E Disorder, and Non-Alzheimer's Dementia, Interview for Mental Status (BIM exhibited wandering behavior 1 to 1/30/2014, identified that the recare Plan identified an Approach elopement, with the indicated Goentry of 02/09/2014 for the 7:00 the Day Room for an activity. He had been found by a previous of the side of a road by a previous of resident had been found by a previous momented that at 3:45 p.m. on Room sometime after 4:00 p.m. a This FR documented that the faciorridor which lead to the adjoinia above, the corridor which lead to the adjoinia above, the corridor which lead to the adjoinia bove, the corridor which lead to the adjoinia above, the corridor which lead to the adjoin		ing staff related to bement, but continued to be work. In-service knowledgeable about the vations were made to assess f the facility's first Jnit C. Observation during on of residents at risk strance/exit doors located at the d of the Unit C front f Unit B revealed a cility. This corridor which did not have a utton. This corridor containing ted through the hospital noted that the nursing thus allowing residents c unalarmed, unlocked double d a.m., the Administrator fouard alarm and were not to f 01/30/2014, documented ion, [MEDICAL CONDITION] Impairment, with a Brief ted that Resident #1 had dmission Care Plan, dated this Nursing Admission esident #1's risk for s. A Nurse's Notes (NN) Jent #1 had been seated in at Resident #1 had been found at bital ED (Emergency and forehead, and that the nome. Resident #1 sED 2014 facility Follow-Up Report (FR) Heft the facility's Day nile from the nursing facility. Suble doors located in a beservation referenced access, contained the adjoining hospital facility, an interview conducted on B corridor were not locked (09/2014, Resident #1 walked and eloped through the pervision of residents tn #1 having severe cognitive fourth brough the pervision of residents tn #1 having severe cognitive fourth the unalarmed,
	a nasal fracture, and a fractured r #1. 2. Resident #12's MDS of 11/ and Dementia, and Section C - C	half (1/2) mile, fell and sustained facial abrasions, a nasal lacer ight knee cap. Cross refer to F323, example 1, for more inform 1/1/2013 documented diagnoses, in Section I - Active Diagnose ognitive Patterns documented a BIMS Summary Score of seve #12's Care Plan revealed that the resident resided on Unit B of	ation regarding Resident es, which included Hypertension n (7), indicating severe cognitive

to the hospital, and which served as a direct route of egress from the nursing facility, the facility failed to ensure that the WanderGuard bracelet utilized by Resident #12, as specified by the Care Plan, would allow redirection of the resident as indicated, also as specified by the Care Plan, by alerting staff to wandering/elopement attempts through this unsecured corridor. This presented a wandering risk for Resident #12. Cross refer to F323, example 2, for more information regarding Resident #12. 3. Resident #14's MDS of 01/06/2014 documented diagnoses, in Section I - Active Diagnoses, which included [MEDICAL CONDITION], Hypertension, [MEDICAL CONDITION], Dementia, [MEDICAL CONDITION] Disorder, and a [MEDICAL CONDITION], and Section C - Cognitive Patterns documented severe cognitive impairment, with a BIMS Summary Score of ninety-nine (99). Resident #14's Care Plan identified that the resident resided on Unit C. The Care Plan also identified, as a Problem/Need originally dated 04/18/2013, that Resident #14 was at risk for elopement from the facility. The Care Plan referenced Approaches to address Resident #14's elopement risk which include the use of a WanderGuard bracelet at all times, and for staff to provide redirection as indicated. However, as indicated in the 02/14/2014, 12:30 p.m. tour observation referenced above, Resident #14, who wore a WanderGuard bracelet for elopement-risk and resided on Unit C, had direct access to Unit B, where observation revealed the corridor which lead off of Unit B and contained the double doors which were not locked or equipped with a WanderGuard alarm, and lead to the hospital facility that adjoined the nursing facility, exiting through the hospital's main front entrance/exit. Based on the above, despite the facility's system for supervision of residents at risk of wandering/elopement involving the use of WanderGuard bracelets, despite Resident #14 (who resided on Unit C and had direct access to Unit B) having Dementia and severe cognitive impairment, despite the reside

this Care Plan, indicated as a Problem/Need and originally dated 12/31/2013, identified Resident #12 to have wandering behavior. Approaches listed on Resident #12's Care Plan to address this wandering behavior included the use of a WanderGuard bracelet to be applied at all times, and to redirect the resident as indicated. The Goal for these Approaches identified on Resident #12's Care Plan included that the resident would not leave the facility unescorted. However, as

indicated in the 02/14/2014, 12:30 p.m. tour observation referenced above, the corridor leading to the adjacent hospital facility, and located at the end of the B Hall of Unit B where Resident #12 resided and to which Resident #12 had direct access, contained double doors which were unlocked and not equipped with a WanderGuard alarm. This corridor continued into the hospital facility and exited through the hospital's main front entrance/exit. Based on the above, despite the

despite Resident #12, who resided on Unit B, having Dementia and severe cognitive impairment and having been assessed to have a history of wanderfug behavior, and despite the resident's Care Plan specifying the use of a WanderGuard bracelet and that staff redirect the resident as indicated, the facility failed to ensure that double doors located in the corridor which exited Unit B and lead directly into the adjoining hospital were WanderGuard alarm equipped. By failing to ensure WanderGuard alarm placement on the unlocked double doors contained within this corridor leading from the nursing facility

CENTERS FOR MEDICARE & MEDICAID SERVICES				PRINTED:9/5/2014 FORM APPROVED OMB NO. 0938-0391
DEFICIENCIES AND PLAN OF	(X1) PROVIDER / SUPPLIER / CLIA IDENNTIFICATION NUMBER 115714	(X2) MULTIPLE CONSTRUCT A. BUILDING B. WING	TION	(X3) DATE SURVEY COMPLETED 02/20/2014
NAME OF PROVIDER OF SUPPLIER		STREET ADDRESS, CITY, STATE, ZIP		
NORTHRIDGE HEALTH AND REHABILITATION		100 MEDICAL CENTER DRIVE COMMERCE, GA 30529		
For information on the nursing ho	ome's plan to correct this deficien	cy, please contact the nursing hon	ne or the state survey agency.	

(X4) ID PREFIX TAG SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY

F 0282

Level of harm - Immediate jeopardy

Residents Affected - Some

(continued... from page 3) unsecured corridor. This presented an elopement risk for Resident #14. Cross refer to F323, example 3, for more information regarding Resident #14. 4. Resident #5's MDS of 11/19/2014 documented diagnoses, in Section I - Active Diagnoses, of [MEDICAL CONDITION], Heart Failure, Hypertension, [MEDICAL CONDITION], Diabetes Mellitus, Arthritis, a history of

[MEDICAL CONDITION], Heart Failure, Hypertension, [MEDICAL CONDITION], Diabetes Mellitus, Arthritis, a history of [MEDICAL CONDITION], and Dementia. Section C - Cognitive Patterns documented that Resident #5 had moderate cognitive impairment, with a BIMS Summary Score of twelve (12). The Care Plan of Resident #5 identified that he/she resided on facility Unit B. Resident #5's Care Plan also identified, as a Problem/Need originally dated 11/20/2013, that the resident had the potential for elopement related to both episodes of confusion with wandering and a history of wandering. This Care Plan identified Approaches to address Resident #5's elopement-risk which included the use of a WanderGuard at all times, and also staff redirection as indicated. However, as indicated in the 02/14/2014, 12:30 p.m. tour observation referenced above, the double doors located within the corridor which lead off of Unit B, where Resident #5 resided, were unlocked and were not equipped with a WanderGuard alarm. This corridor within which these unlocked, unalarmed double doors were located was accessible by Resident #5, lead into the adjoining hospital facility, and exited through the hospital's main front entrance/exit. Based on the above, despite the facility's system for supervision of residents at risk of wandering/elopement involving the use of WanderGuard bracelets, despite Resident #5, who resided on Unit B, having Dementia and cognitive impairment and having been assessed to have the potential for elopement due to confusion and a history of wandering behavior, and despite the resident's Care Plan specifying the use of a WanderGuard bracelet and that staff redirect the resident as indicated, the facility failed to ensure that double doors located in the corridor which exited Unit B and lead directly into the adjoining hospital were WanderGuard alarm-equipped. By failing to ensure WanderGuard alarm placement on the unlocked double doors within this corridor which served as a direct route of egress from the nursing facility, the f MEDICAL REDACTEDJ. The Care Plan of Resident #11 identified that the resident resident resident in facility Unit C. The Care Plan also identified, as a Problem/Need originally dated 07/16/2013, that Resident #11 had the potential for wandering behavior, with a history of wandering in the hallways. Care Plan Approaches to address Resident #11's risk for wandering included the use of a WanderGuard bracelet at all times and for staff to redirect the resident as indicated. However, as indicated in the 02/14/2014, 12:30 p.m. tour observation referenced above, Resident #11, who utilized a WanderGuard bracelet and resided on 02/14/2014, 12:30 p.m. tour observation referenced above, Resident #11, who utilized a WanderGuard bracelet and resided on Unit C, had access to the corridor which exited off of Unit B, contained the double doors which were unlocked and were not equipped with a WanderGuard alarm, and which lead from the nursing facility to the adjoining hospital and exited through the hospital's main front entrance/exit. Based on the above, despite the facility's system for supervision of residents at risk of wandering/elopement involving the use of WanderGuard bracelets, despite Resident #11 (who resided on Unit C and had direct access to Unit B) having Dementia/severe cognitive impairment and having been assessed with [REDACTED]. Unit B, lead directly into the adjoining hospital, and allowed nursing facility egress. By failing to ensure WanderGuard alarm placement on these unlocked doors, the facility failed to ensure that the WanderGuard bracelet utilized by Resident #11, as specified by the Care Plan, would allow redirection as indicated, also as specified by the Care Plan, by alerting staff to resident by the Care Fiah, would anow technetion as inticated, also as specified by the Care Fiah, by a terting star to festident wandering in this unsecured corridor. This represented a wandering risk for Resident #11. Cross refer to F323, example #5, for more information regarding Resident #11. The immediate jeopardy was determined to have been removed on February 19, 2014, at which time the facility had presented and implemented a credible allegation of jeopardy removal with the following interventions: A. On February 9, 2014, after learning of Resident #1's elopement, the facility conducted a full resident audit to assure the presence of all residents. B. On February 9, 2014, all doors exiting the nursing facility were checked to ensure the proper working order of the WanderGuard alarm system. All existing WanderGuard alarms were functioning properly. C. On February 9, 2014, a procedure was put into place by which a facility employee was placed at the doorway, located in the corridor leading from the nursing facility to the hospital, which was not equipped with a WanderGuard alarm. A scheduled was developed reflecting specific employees who were assigned to be in place at the unalarmed doorway, at specific times and continuously around the clock, until a WanderGuard alarm was installed on the doorway. D. On February 9, 2014, chart audits for all current facility residents were conducted to ensure that all residents who demonstrated a potential for elopement had been accurately identified by the facility. During these chart audits, no new residents were identified to have the potential for elopement. E. On February 9, 2014, Care Plan reviews were conducted for residents assessed to be at risk for elopement to ensure that a comprehensive approach to address this risk was in place. During these Care Plan reviews, no problems were identified. F. On February 9, 2014, in addition to daily WanderGuard bracelet checks completed by the Activities Director which were in place prior to Resident #1's elopement, the facility implemented audits of the door alarms through the preventative maintenance program. The door alarms would be checked weekly, on each Tuesday, by the Maintenance Director, and these door alarm checks would be documented via computer data entry. The door alarm test would include a check of the power indicator light to ensure proper function, and also a check for battery condition. A sensor button was to be used to test each door alarm, with the alarm to sound when within six feet of an condition. A sensor button was to be used to test each door alarm, with the alarm to sound when within six feet of an alarmed doorway. If a door alarm did not initially sound, the test was to be repeated with a different sensor button. Any deviation from full working order found during these weekly door alarm checks would be reported to the Administrator for immediate correction. The Administrator or DON would monitor the results of these weekly door alarm audits, conducted by the Maintenance Director, by reviewing the computer data entered as a result of the door alarm checks weekly for four (4) weeks, then monthly for three (3) months, then quarterly thereafter. The results of these supervisory audits will be submitted to the Quality Assessment/Performance Improvement (QA/PI) Committee for their review. G. On February 9, 2014, the facility contacted the Medical Director to inform him of the elopement of Resident #1. Additionally, a meeting which consisted of some members of the QA/PI Committee, including the Administrator, DON, and Director of Maintenance, was held to review the alexengent event and the actions which had been taken by the facility and to identify use additional contract. consisted of some members of the QA/PI Committee, including the Administrator, DON, and Director of Maintenance, was held to review the elopement event and the actions which had been taken by the facility, and to identify any additional actions that were needed. H. On February 15, 2014, the corridor doorway, which lead from the nursing facility to the hospital and which had previously lacked a WanderGuard alarm, was equipped with a WanderGuard alarm. I. On February 18, 2014, the facility continued to provide staff in-service training to facility staff, including licensed nurses, CNAs, and maintenance/housekeeping staff. This in-service training served to both reinforce current facility protocols involving the routine monitoring of residents having WanderGuard bracelet devices and also to provide staff training on newly-implemented protocols related to the facility's WanderGuard alarm system. As of February 18, 2014, 116 of the facility's total 118 employees had received this in-service training. The two (2) remaining staff members, who were on Family and Medical Leave Act leave at the time this in-service training was provided, will received the training upon their return to work. J. On February 18, 2014, the QA/PI Committee met to review the elopement event involving Resident #1, to review the actions taken by the facility as of that date, and to review the monitoring systems put into place as a result of the elopement. The by the facility as of that date, and to review the monitoring systems put into place as a result of the elopement. The QA/PI Committee will review the results of WanderGuard bracelet monitoring and door alarm audits weekly for four (4) weeks, QAPI Committee will review the results of WanderGuard bracelet monitoring and door alarm audits weekly for four (4) weeks, then monthly for three (3) months, then quarterly thereafter to ensure ongoing compliance with the systemic measures implemented to correct the identified issue and prevent recurrence. The information will be analyzed by the QA/PI Committee, and subsequent plans of correction will be developed and implemented as needed. This will be an ongoing process. Based on these corrective actions which had been developed and implemented as needed. This will be an ongoing process of the deficient practice was removed on February 19, 2014. However, the effectiveness of the corrective action plans could not be fully assessed to ensure ongoing application and completion. On February 9, 2014, the facility implemented a weekly audit of WanderGuard door alarms to be accomplished through the preventative maintenance program by the Maintenance Director. These weekly WanderGuard door alarm audits would check for the proper function of all facility WanderGuard door alarms, and were to be documented via computer data entry. However, these weekly WanderGuard door alarm audits had been initiated only on February 9, 2014, and had occurred only twice prior to the February 20, 2014 exit date of this complaint survey. Therefore, oneoing staff compliance with this newly implemented procedure involving routine, scheduled WanderGuard. survey. Therefore, ongoing staff compliance with this newly implemented procedure involving routine, scheduled WanderGuard door alarm monitoring could not be entirely assessed at the time of survey completion, and will thus need future evaluation. Additionally, by February 18, 2014, the facility had completed in-service training for 116 of its 118 facility employees, to include licensed nurses, CNAs, and maintenance/housekeeping staff, regarding both existing and newly-implemented protocols involving the monitoring of residents with WanderGuard bracelets and the WanderGuard alarm system. However, two (2) remaining staff members, who were on leave and had been unavailable for training, will need to receive this training upon returning to work, and this training will thus need future evaluation. Additionally, the QA/PI

Facility ID: 115714

DEPARTMENT OF HEALTH AND HUMAN SERVICE	ES
CENTERS FOR MEDICARE & MEDICAID SERVICES	

PRINTED:9/5/2014 FORM APPROVED OMB NO. 0938-0391

				V2) DATE CUDVEY	
STATEMENT OF	(X1) PROVIDER / SUPPLIER	(X2) MULTIPLE CONSTRUCT	TION	(X3) DATE SURVEY COMPLETED	
DEFICIENCIES AND PLAN OF	/ CLIA IDENNTIFICATION	A. BUILDING B. WING		02/20/2014	
CORRECTION	NUMBER			02/20/2014	
	115714				
NAME OF PROVIDER OF SUPPLIER STREET ADDRESS, CITY, STATE, ZIP					
NORTHRIDGE HEALTH AN	D REHABILITATION		100 MEDICAL CENTER DRIV COMMERCE, GA 30529	VE	
For information on the nursing l	nome's plan to correct this deficience	cy nlease contact the nursing hon			
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF D			ZELLI DECLILATODY	
(A4) ID TREFIX TAG	OR LSC IDENTIFYING INFORM		AVE I MOST BETREEEDED BI	TOLE REGULATION	
F 0282	(continued from page 4)				
Level of harm - Immediate			pracelet monitoring and door alarm ly two (2) days prior to the Februa		
jeopardy immediate	this complaint survey, to begin the	is process. Thus, the QA/PI Comi	mittee's ongoing process of facility	procedural oversight	
Residents Affected - Some	severity is reduced to the E level.	of survey completion. Therefore	, the non-compliance continues, bu	at the scope and	
F 0323	Make sure that the nursing l	home area is free from accident	hazards and risks and		
Level of harm - Immediate	provides supervision to prevent **NOTE- TERMS IN BRACKET		OTECT CONFIDENTIALITY**		
jeopardy	Based on observation, clinical rec	ord review, EMS Prehospital Car	e Report Summary review, hospita	al Record of Admission	
Residents Affected - Some	report review, hospital ER Triage review, Weather.com report revie	Record review, hospital ED Nurs	sing Record review, nursing facilit	y Follow-Up Report	
Residents Affected - Some	interview, the facility failed to en	sure that the WanderGuard alarm	system, utilized by the facility to	alert staff of	
	attempts by residents having wan		the facility, included alarm cover ch was accessible to Unit B and U		
	which exited the nursing facility i	nto the adjoining hospital facility	. The facility's failure to ensure W	anderGuard alarm	
			from the nursing facility into the hasident (#1) who utilized a Wander		
	wandering/exit-seeking behavior	and eloped through these unlocke	d/unalarmed doors, and as a poten	itial route of elopement	
			ey sample with known elopement secured nursing home/hospital cor		
	sample of fourteen (14) residents.	Resident #1 accessed this unsecu	nred corridor on 02/09/2014, exited eloped through the adjoining hosp	d the nursing facility	
	traveled along a street for a distan	ce of approximately one-half mile	e, fell hitting his/her head on the p	avement, was taken	
	to the hospital Emergency Depart sutures, a nasal fracture, and a fra				
	non-compliance with one or more	requirements of participation had	d caused, or had the likelihood to d	cause, serious injury,	
	harm, impairment or death to resi- jeopardy on February 18, 2014 at				
	existed on February 9, 2014 (the	date Resident #1 eloped from the	facility via the set of unlocked, un	alarmed, and	
			rsing facility to the adjoining host 4. The facility implemented a cred		
	removal related to the immediate failed to ensure supervision of Re	jeopardy on February 18, 2014. I	Ouring this survey, it was determin	ed that the facility	
	facility, traveled a distance of app	roximately one-half mile, and sus	stained a fall resulting in facial abr	asions, a nasal	
			nee cap. On 02/05/2014, prior to to located on the nursing facility's fi		
	having been admitted to Unit E lo	cated on the second floor upon or	riginal facility admission. Howeve	r, a Unit B corridor	
			nich adjoined the nursing facility, a and were not locked. During an in		
	Administrator conducted on 02/14	1/2014 at 11:50 a.m., when questi	oned about Resident #1's 02/09/20	014 nursing facility	
			t B room had been located in close into the hospital and which did no		
			d passed through the unalarmed co of the hospital. In addition to Resid		
	more sampled residents (#5, #11,	#12, and #14) who had cognitive	impairment and utilized WanderC	duard bracelets for known	
			Unit B or Unit C, both of which a hospital. An allegation of jeopardy		
	on February 19, 2014. Based on the	he corrective plans which had bee	en developed and implemented by	the facility, the immediacy	
			February 19, 2014, and the facility mpleted a process which involved		
	staff in-service, of available nursi	ng staff related to procedural revi	sions made to ensure adequate sur	pervision for	
			in-service training to staff who we ials and records were reviewed. In		
			monitoring of residents requiring s s staffs' performance of care and s		
	residents. Findings include: 1. Re-	cord review for Resident #1 revea	aled a 5-day PPS Minimum Data S	Set (MDS) Assessment having	
	an Assessment Reference Date of [DIAGNOSES REDACTED].#1		facility Entry Date of 01/30/2014 Section C - Cognitive Patterns d		
	a Brief				
	Interview for Mental Status (BIM Section G - Functional Status indi		endent with walking, and Section		
			ng the look-back period, and that t place (e.g., outside of the facility)		
	Resident #1's admission physician	n's orders [REDACTED]. A Physi	ician's Interim Orders form dated (01/31/2014 specified that	
	Resident #1 was to wear a Wande referenced above also documented		01/30/2014 admission physician's		
	facility's second floor units utilize	d for the placement of residents a	t risk for elopement). However, a	Nurse's Notes (NN)	
			been transferred to Unit B (a first 0 a.m7:00 p.m. shift for Resident		
	the resident was alert but with cor	nfusion, and that the resident had	been pacing in the hall and going i	into other	
	had to redirect the resident. A NN	cumented that Resident #1 had ap entry of 02/07/2014 of the 7:00 p	pproached the C Hall doors twice to m -7:00 a m, shift for Resident #	that shift, and that staff	
	resident had been walking up and	down the hall, and a twenty-four	hour summary assessment sheet of	of 02/07/2014 for Resident	
	#1 documented that the resident h		on both the day and night shifts. A e resident remained confused, was		
	and stating that someone was com	ning to get her. This NN also docu	imented that Resident #1's family	would visit, but that the	
			ft summary assessment of 02/08/2 the day shift of that date. A NN er		
	the 7:00 a.m7:00 p.m. shift for F	Resident #1 documented that the r	esident continued to show confusi	on and was following	
	would redirect him/her as he/she	got to the end of the hallways. Th	nt #1 was walking up and down th is NN also documented that Resid	ent #1 had stated Which	
	way is the way out? I need to get	home. The NN documented that a	nt around 3:45 p.m. on 02/09/2014 LPN) AA and seated in the Day R	, Resident #1 had been	
	that moments later, a certified nur	sing assistant was noted assisting	Resident #1 with the activity whi	le seated at the	
	table in the Day Room. However, a NN entry of 02/09/2014, timed at 5:00 p.m., for Resident #1 documented that the nurse received a telephone call from a family member of Resident #1 to inform the nurse that the resident had been found at the				
roadside, and in close proximity to a local lake, by a previous neighbor, who had noted injuries and called Emergency					
	Medical Service (EMS) 911. The room. In this NN, the nurse reference				
	the resident had eloped from the b	ouilding. A NN entry of 02/09/202	14, timed at 5:10 p.m., for Resident for facility medical record and wall	nt #1 documented that	

FORM CMS-2567(02-99) Event ID: YL1O11 Facility ID: 115714 If continuation sheet Page 5 of 9

DEPARTMENT OF HEALTH CENTERS FOR MEDICARE			PRINTED:9/5/2014 FORM APPROVED OMB NO. 0938-0391
STATEMENT OF DEFICIENCIES AND PLAN OF	(X1) PROVIDER / SUPPLIER / CLIA IDENNTIFICATION	(X2) MULTIPLE CONSTRUCTION A. BUILDING B. WING	(X3) DATE SURVEY COMPLETED 02/20/2014
CORRECTION	NUMBER 115714		
NAME OF PROVIDER OF SU		STREET ADDRI	ESS, CITY, STATE, ZIP
NORTHRIDGE HEALTH A	ND REHABILITATION	100 MEDICAL (COMMERCE, (CENTER DRIVE GA 30529
For information on the nursing	home's plan to correct this deficien	cy, please contact the nursing home or the state surv	
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF I OR LSC IDENTIFYING INFOR	DEFICIENCIES (EACH DEFICIENCY MUST BE	PRECEDED BY FULL REGULATORY
F 0323	(continued from page 5)	VIATION)	
Level of harm - Immediate jeopardy	The nurse documented in this NN Technician that he had cut a Wan #1 documented that on 02/09/201	that once she arrived in the hospital ER, she was in derGuard bracelet off of Resident #1. The EMS Pre 4 at 4:40 p.m., EMS had received a telephone call r	chospital Care Report Summary for Resident regarding Resident #1. This EMS Report
Residents Affected - Some	home and to have fallen face-first contusion with laceration to the n Record of Admission for Residen	staff responded and found Resident #1 to have walk to the roadway. This EMS Summary documented ose, and further documented the resident's hospital t #1 revealed a hospital admission date of [DATE],	a hematoma to Resident #1's forehead and a transport. Review of the hospital
	REDACTED]. The ER Triage Record for Reside	ent #1 documented, in the Assessment section, a Chi	ief Complaint of the resident having fallen
		/her face and forehead approximately thirty (30) mi. NR) for Resident #1 contained an entry, dated 02/09	
	documented the resident's hospita	Il ED nursing assessment. This EDNR entry docume ONR entry also documented that lacerations and about	ented that Resident #1 stated he/she had
	face, bridge of the nose, and forel	nead. The EDNR entry further documented that Res	ident #1 had been found by a previous
	place of dwelling prior to nursing	home admission). A subsequent EDNR entry for R	esident #1, dated 02/09/2014 and timed at
	8:20 p.m., documented that Resident #1	lent #1 had been discharged to home from the hospi documented an ED discharge date of [DATE], and	tal with family members. The ED Discharge documented ED [DIAGNOSES REDACTED].
	During an interview with hospital ED Re	gistered Nurse (RN) CC conducted on 02/18/2014 a	at 1:15 p.m., RN CC stated that he was
	working in the hospital's ED on the	ne evening of 02/09/2014 when Resident #1 was bro long-sleeve shirt, jogging pants, and shoes when he	ought to the ED for treatment of
	treatment. Review of Weather.co	m revealed that the exterior environmental temperate cated, registered at 59 degrees Fahrenheit on 02/09/2	ture for the Commerce, Georgia area, in
	approximate time of Resident #1'	s elopement from the facility. A facility Follow-Up	Report (FR) dated 02/14/2014 referenced
	documented, in the Background s	facility's investigation into Resident #1's 02/09/2014 ection, that after Resident #1's original facility adm	ission to Unit E (on the facility's
	Unit B (on the facility's first floor	sidered to be at risk for elopement were housed, the on 02/05/2014 at the request of the resident's family	ly. The Review of Initial Report
	section of this FR documented th	at on 02/09/2014 at 5:00 p.m., the facility received a ent #1 had left the facility. Further review of the FR	a telephone call from a family member
	Investigation/Chronology of Ever	nts section, that at 3:45 p.m. on 02/09/2014, Resider nat Certified Nursing Assistant (CNA) BB had assis	nt #1 had been placed in the Day Room
	p.m. until 4:05 p.m. CNA BB the	n left Resident #1 to assist other residents in prepari	ing for dinner. This FR documented
	documented that Resident#1 almo	02/09/2014, Resident #1 left the Day Room and hea ost reached his/her former home, located 0.83 mile f	from the nursing facility, but sustained a
		umented that at 5:00 p.m., the facility received a tel iff of the resident's elopement and hospital transfer,	
		t and fall, the resident was treated for [REDACTED n., Resident #1 left the hospital in the company of a	
	returning to the nursing facility.	The Summary/Conclusion section of the FR, which a fall with injuries on 02/09/2014 as referenced above	chronicled the facility's investigation
	concluded that it was unknown he	ow Resident #1 was able to elope from the facility u	indetected. This section of the FR
	corridor which went past the facil	lieved that Resident #1 could have eloped through t lity's kitchen and eventually lead to the adjoining ho	ospital's main entrance/exit. During
		4/2014 at 12:30 p.m., accompanied by the facility's the former Unit B room where Resident #1 had res	
		bserved to be at the end of the B Hall of Unit B. Apport the B Hall of Unit B, a corridor turned to the right	
	corridor extended a distance of ap	opproximately twenty (20) feet, at which point a set of unalarmed, and were observed to open after activate	of double doors was encountered. These
	an adjacent wall and in close pro-	simity to the double doors. These doors were not loo	cked, and opened when the wall-mounted
	approximately twenty (20) feet, the	through this set of unlocked double doors, the corn then turned right and continued for a distance of app	roximately another eighty (80) feet,
	unlocked, unalarmed, and located	spital facility and exiting through the hospital's mair at the front of the hospital. Upon exit through the h	nospital's front main entrance/exit
		lot was located directly in front of the entrance/exi- nich ran in front of the hospital and nursing facility	
	the Administrator conducted on 0	12/14/2014 at 11:50 a.m., the Administrator stated thing facility admission, was located on the street whi	nat Resident #1's former home, where the
	parking lot, at a distance of 0.83	mile (Source: MapQuest.com) from the nursing faci	lity/hospital. The Administrator
	to have fallen and sustained injur	treet, and in close proximity to Resident #1's former les after having eloped from the nursing facility on 0	02/09/2014. During the 02/14/2014,
	where Resident #1 had resided ar	eferenced above, observations made of the facility's ad Unit C) revealed a WanderGuard alarm on the en	trance/exit doors located at the nursing
		nt of the facility. Additionally, observation in Unit C ated at the terminal end of Unit C's front corridor wh	
	adjoining hospital facility. Howe	ver, as referenced above, the double doors which we adjoining hospital facility, and through which Residual	ere located in the corridor leading off
	02/09/2014, did not have a Wand	erGuard alarm and were not locked. During this obs	servation, it was noted that Unit B was
	residents of both units access to t	sidents of both Unit B and Unit C to move freely be the Unit B corridor, ultimately leading to the hospita	l, in which the unlocked double
		VanderGuard alarm. During the 02/14/2014, 11:50 a tor was questioned regarding Resident #1's 02/09/20	
	this interview, the Administrator	stated that Resident #1's room, located on the B Hal bors which were not locked, which did not have a W	ll of Unit B, was located in close
	located in the corridor leading pa	st the kitchen area and then into the hospital. The A D p.m., Resident #1 had been observed by staff while	dministrator stated that on
	Room. The Administrator stated	that it was thought that Resident #1 left the Day Roo	om shortly after 4:00 p.m. to return to
	entered into the hospital corridor,	to walk down the B Hall corridor, passed through the and exited the hospital through the hospital's front	main entrance/exit doors. The
		ht that Resident #1, upon exiting the hospital, walked, made a left onto the street, walked approximately	
	found by a former neighbor to be	lying face down in a ditch by the street. The Admir oximately 0.83 mile from the nursing facility/hospit	nistrator acknowledged that Resident
	to have fallen after the 02/09/201	4 elopement from the nursing facility. The Adminis	trator further stated that after
	properly, but acknowledged that	ity doors having WanderGuard alarms were checked the corridor doors through which it was though Resi	ident #1 had passed (and then eloped
		nce/exit) did not have a WanderGuard alarm. During N stated that on 02/09/2014, after Resident #1 elop	
	Supervisor had tested all existing	WanderGuard-alarmed exit doors and had found the truer room was located close to the end of the B Uni	em to be working properly. However, the
	unalarmed corridor doors at the e	and of the corridor. The DON stated that, based on the armed doors were functioning correctly on 02/09/20	ne Maintenance Supervisor's finding
		orridor upon which his/her room was located, but the	

NORTHRIDGE HEALTH AND REHABILITATION

PRINTED:9/5/2014 FORM APPROVED

100 MEDICAL CENTER DRIVE

				OMB NO. 0938-0391
DEFICIENCIES AND PLAN OF	(X1) PROVIDER / SUPPLIER / CLIA IDENNTIFICATION NUMBER	(X2) MULTIPLE CONSTRUCT A. BUILDING B. WING	ION	(X3) DATE SURVEY COMPLETED 02/20/2014
	115714			
NAME OF PROVIDER OF SUPPLIER			STREET ADDRESS, CITY, STA	ATE, ZIP

COMMERCE, GA 30529 For information on the nursing home's plan to correct this deficiency, please contact the nursing home or the state survey agency

SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY (X4) ID PREFIX TAG

F 0323

Level of harm - Immediate jeopardy

Residents Affected - Some

(continued... from page 6)
the resident to continue walking down the corridor out of the nursing facility and to exit out the front doors of the hospital. Based on the above, despite the facility's system for supervision of residents at risk of wandering/elopement involving the use of WanderGuard bracelets, despite Resident #1 having severe cognitive impairment and a known history wandering behavior requiring the use of a WanderGuard bracelet, despite Resident #1 being observed on multiple occasions to continue exhibiting both wandering behavior and exit-seeking behavior, the facility transferred Resident #1 on 02/05/2014 from Unit E (a second floor unit for which the exit was WanderGuard alarm protected) to Unit B (a first floor unit which allowed access to a set of unsecured, unlocked corridor doors which did not have a WanderGuard alarm and which lead to the aniowed access to a set of unsecured, unlocked corridor doors which did not have a wander-Guard alarm and which lead hospital.) Resident #1 then exited through the unalarmed, unlocked corridor double doors while wearing a Wander-Guard bracelet but without the knowledge of nursing facility staff, gained access to the hospital corridor, exited the hospital through the hospital's front entrance/exit doors, and eloped from the facility. The facility thus failed to ensure supervision of Resident #1 related to his/her risk for elopement/wandering, via the use of the Wander-Guard bracelet as ordered by the physician, by failing to ensure the placement of a Wander-Guard alarm on the unlocked corridor doors contained within the corridor which exited off of Unit B where Resident #1 resided, allowing the resident to exit through ordered by the physician, by failing to ensure the placement of a WanderGuard alarm on the unlocked corridor doors contained within the corridor which exited off of Unit B where Resident #1 resided, allowing the resident to exit through these doors undetected by staff and to elope. After Resident #1 eloped, he/she then traveled approximately one-half (1/2) mile toward his/her former home, fell, and sustained facial abrasions, a nasal laceration requiring sutures, a nasal fracture, and a fractured right knee cap. In addition to Resident #1 referenced above, four (4) additional sampled residents (#5, #11, #12, and #14) utilized WanderGuard bracelets for elopement and/or wandering behaviors and resided on either Unit B or Unit C of the facility's first floor. As documented in the 02/14/2014, 12:30 p.m. observation of Unit B and Unit C referenced above, these units were contiguous, therefore allowing Residents #5, #11, #12, and #14 to move freely between these units. However, as also documented in the 02/14/2014, 12:30 p.m. Unit B and Unit C observation referenced above, the unlocked double doors located in the facility corridor which lead off of Unit B, into the adjoining hospital facility, and ultimately allowing exit through the hospital's main front entrance/exit doors, were neither locked nor WanderGuard barcelet use and who all had access to these unlocked/unalarmed corridor doors) at risk for elopement, as evidenced by the following: 2. Record review for Resident #12 revealed a Quarterly MDS having an Assessment Referenced Date of 11/11/2013 which documented in Section 1 - Active [DIAGNOSES REDACTED]. Section C - Cognitive Patterns of this MDS documented that Resident #12 had a BIMS Summary Score of 7, indicating that the resident had severe cognitive impairment. Section J - Health Conditions documented that the resident #12 utilized a walker and wheelchair as mobility devices, and Section J - Health Conditions documented that the resident was rolling himself/herself in the wheelchair, going to the C Hall an system for supervision of residents at risk of wandering/elopement involving the use of WanderGuard bracelets, despite Resident #12 (who resided on Unit B) having severe cognitive impairment, despite the resident having been assessed to have a history of wandering behavior and continuing to exhibit exit-seeking behavior thereby requiring the use of a WanderGuard bracelet, and despite the resident being ambulatory via wheelchair and walker, the facility failed to ensure that the WanderGuard system, intended to prevent resident elopement, included a WanderGuard alarm on the unlocked double doors in the nursing facility corridor which exited Unit B (upon which Resident #12 resided) and lead into an unsecured corridor in wanterOutant systent, included to prevent resident etoperinent, included a wanterOutant at an in the tuncket double doors in the horspital. The facility corridor which exited Unit B (upon which Resident #12 resided) and lead into an unsecured corridor in the hospital. The facility thus failed to ensure adequate supervision, via the WanderGuard bracelet, for Resident #12, who was at risk for wandering/elopement and who required the use of the WanderGuard bracelet for this risk. 3. Record review for Resident #14 revealed a Quarterly MDS assessment having an Assessment Reference Date of 01/06/2014 which documented in Section I - Active [DIAGNOSES REDACTED]. Section C - Cognitive Patterns documented that Resident #14 had a BIMS Summary Score of 99, indicating that the resident had severe cognitive impairment, and documented that the resident had both short-term and long-term memory problems. Section G - Functional Status documented that Resident #14 required only supervision/limited assistance with locomotion, and that the resident utilized a wheelchair as a mobility device. Resident #14's Care Plan identified the resident to be at risk for elopement, and specified the use of a WanderGuard bracelet. An Interdisciplinary Progress Notes (IPN) entry of 02/08/2014 at 11:00 a.m. for Resident #14 documented that the resident resident on Unit C (located on the facility's first floor and adjacent to Unit B), and that the resident was noted to be following other residents into their rooms, requiring redirection. A later IPN of 02/08/2014 at 3:00 p.m. documented that Resident #14 was following a resident down the hallway. An IPN of 02/13/2014 at 2:30 p.m. for Resident #14 documented that Resident #14 had again gone into another resident's room. However, the 02/14/2014, 12:30 p.m. observation referenced above revealed that, even though Resident #14 required the use of a WanderGuard bracelet for a risk of elopement and resided on Unit C, the resident also had access to Unit B and thus had access to the double doors, which were the facility's system for supervision or lesidens at fisk of wandering elopement involving the use of wander-totald bracelets, despite Resident #14 (who resided on Unit C) having severe cognitive impairment and having been assessed to be at risk for elopement requiring the use of a WanderGuard bracelet, and despite the resident being ambulatory via a wheelchair and continuing to exhibit wandering behavior, the facility failed to ensure that the WanderGuard alert system, intended to prevent resident elopement, included the placement of a WanderGuard alarm on the set of unlocked double doors in the nursing facility corridor which exited Unit B (to which Resident #14 had access) and lead into a corridor in the hospital adjacent to the nursing facility. The facility thus failed to ensure adequate supervision, via the WanderGuard bracelet for this control of the WanderGuard bracelet for this bracelet, for Resident #14 who was at risk for elopement and who required the use of the WanderGuard bracelet for this risk. 4. Record review for Resident #5 revealed an Annual MDS assessment having an Assessment Reference Date of 11/19/2014 which documented in Section I - Active [DIAGNOSES REDACTED]. Section C - Cognitive Patterns of this MDS documented that Resident #5 had a BIMS Summary Score of 12, indicating that the resident had moderate cognitive impairment. Section G - Functional Status documented that Resident #5 utilized a walker and a wheelchair as mobility devices, and required the limited assistance with walking in the room and in the corridor of his/her unit, but was totally dependent on staff for limited assistance with walking in the room and in the corridor of his/her unit, but was totally dependent on staff for locomotion off of the unit. Resident #5's Care Plan identified that the resident had the potential for elopement, and that the resident required the use of a WanderGuard bracelet. Further record review for Resident #5 revealed a NN entry of 11/17/2013 for the 7:00 a.m.-7:00 p.m. shift which documented that the resident resided on Unit B, and documented that the resident propelled himself/herself utilizing a wheelchair. However, the 02/14/2014, 12:30 p.m. observation referenced above revealed that, even though Resident #5 resided on Unit B and required a WanderGuard bracelet for the risk of elopement, the resident had access to the double doors which were not locked or WanderGuard alarm equipped, and were located in the corridor which exited Unit B and then exited through the hospital's front entrance/exit. Based on the above, despite the facility's system for supervision of residents at risk of wanderfug/elopement involving the use of WanderGuard bracelets, despite Resident #5 (who resided on Unit B) having cognitive impairment and having been assessed to be at risk for elopement and requiring the use of a WanderGuard bracelet, the facility's failed to ensure that the WanderGuard alert system, intended to prevent resident elopement, included a WanderGuard alarm on the nocked double doors in the corridor which intended to prevent resident elopement, included a WanderGuard alarm on the unlocked double doors in the corridor which exited Unit B and lead into a corridor in the hospital adjacent to the nursing f

F 0520

Level of harm - Immediate jeopardy

Residents Affected - Some

Set up an ongoing quality assessment and assurance group to review quality deficiencies quarterly, and develop corrective plans of action.

Based on observation, record review, and staff interview, the facility failed to ensure oversight by, and the involvement of, the Quality Assessment/Performance Improvement (QA/PI) Committee in the formulation and implementation of a corrective action plan developed in response to resident elopement. This corrective action plan was developed regarding the elopement of one (1) resident (#1) who resided on Unit B, had wandering/elopement behavior, and utilized a WanderGuard bracelet, of five (5) sampled Unit B and Unit C residents (#1, #5, #11, #12, and #14) with known elopement/wandering behavior who

Facility ID: 115714

DEPARTMENT OF HEALTH AND HUMAN SERVICES CENTERS FOR MEDICARE & MEDICAID SERVICES

PRINTED:9/5/2014 FORM APPROVED OMB NO. 0938-0391

				OMB NO. 0938-0391
DEFICIENCIES AND PLAN OF	(X1) PROVIDER / SUPPLIER / CLIA IDENNTIFICATION NUMBER	(X2) MULTIPLE CONSTRUCTI A. BUILDING B. WING	IOIV	(X3) DATE SURVEY COMPLETED 02/20/2014
	115714			
NAME OF PROVIDER OF SUPPLIER			STREET ADDRESS, CITY, STA	TE, ZIP

NORTHRIDGE HEALTH AND REHABILITATION

100 MEDICAL CENTER DRIVE COMMERCE, GA 30529

For information on the nursing home's plan to correct this deficiency, please contact the nursing home or the state survey agency.

(X4) ID PREFIX TAG
SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)

F 0520

Level of harm - Immediate jeopardy

Residents Affected - Some

(continued... from page 7)
utilized WanderGuard bracelets, on the total survey sample of fourteen (14) residents. Resident #1, who utilized a
WanderGuard bracelet to address wandering behavior and resided on Unit B, eloped through unlocked double doors which had no
WanderGuard alarm and which were located in a corridor leading from facility Unit B into the adjoining hospital. Facility
administrative staff developed a corrective action plan in response to Resident #1's elopement to address this failure of
the WanderGuard alert system to protect Resident #1, and the additional residents of Units B and C who were at risk for
elopement/wandering, from eloping through these unlocked and unalarmed corridor doors. However, this corrective action plan
was developed and implemented prior to QA/PI Committee review, analysis and evaluation. This resulted in a situation in
which the facility's non-compliance with one or more requirements of participation had caused, or had the likelihood to
cause, serious injury, harm, impairment or death to residents. The facility's Administrator and Director of Nursing (DON)
were informed of the immediate jeopardy on February 18, 2014 at 9:30 a.m. The non-compliance related to the immediate
jeopardy was identified to have existed on February 9, 2014 (the date Resident #1 eloped from the facility via the set of
unlocked, unalarmed, and unsecured doors located within the corridor which lead from the nursing facility to the adjoining
hospital) continued through February 18, 2014, and was removed on February 19, 2014. During an interview with the
Administrator conducted on 02/14/2014 at 11:50 a.m., the Administrator acknowledged Resident #1's 02/09/2014 nursing
facility elopement, and that a plan of action had been developed by facility management staff in response to the resident's
elopement. However, the Administrator further acknowledged that at the time of this 02/14/2014 interview, the QA/PI
Committee had not met to review and analyze this plan of action which had been developed by faci and implemented by the facility, the immediacy of the deficient practice was determined to have been removed on February 19, 2014, and the facility remained out of compliance at a lower scope and severity of E while the facility completed a process which involved the retraining, via staff in-service, of available nursing staff related to procedural revisions made to ensure adequate supervision for residents at risk of wandering/elopement, but continued to provide in-service training to staff who were initially unavailable for training, as they reported to work. In-service materials and records were reviewed. Interviews were conducted with staff to ensure they were knowledgeable about the monitoring of residents requiring supervision related to the risk of wandering/elopement. Observations were made to assess staffs' performance of care and supervision of these residents. Findings include: Cross refer to F323. Based on observation, clinical record review, and staff interview, the facility failed to ensure that the WanderGuard alarm system included alarm coverage for unlocked double doors located in a first floor corridor which was accessible to residents having elopement/wandering behavior of Unit B and Unit C and which exited the nursing facility into the adjoining bospital. The failure allowed this unlocked double doors located in a first floor corndor which was accessible to residents having elopement/wandering behavior of Unit B and Unit C and which exited the nursing facility into the adjoining hospital. The failure allowed this unlocked and unsecured corridor to serve as a route of elopement, or potential route of elopement, for five (5) residents who utilized WanderGuard bracelets for elopement/wandering behavior (#1, #5, #11, #12, and #14), on the survey sample of fourteen (14) residents. Resident #1 exited the nursing facility through this corridor on 02/09/2014, eloped through the adjoining hospital, traveled along a street for a distance of approximately one-half mile, then fell, was transferred to the hospital, and had sustained facial abrasions, a nasal laceration requiring sutures, a nasal fracture, and a fractured right knee cap. An interview was conducted with the Administrator and DON on 02/20/2014 at 11:30 a.m. related to the facility's QA/PI Committee. During this interview, the Administrator was questioned regarding the QA/PI Committee's involvement in the oversight and evaluation of the facility's system for monitoring residents at risk for elopement/wandering, and of the Committee's involvement in the formulation of corrective actions which were developed and implemented as a result of Resident #1's 02/09/2014 elopement. The Administrator presented a written response to the questions posed during this 02/20/2014, 11:30 a.m. interview. In this written response, the Administrator documented that, prior to the elopement incident of 02/09/2014 involving Resident #1, the WanderGuard system had not been presented to the QA/PI Committee as it had not been identified as an issue that needed to be addressed. The Administrator documented that on the night of 02/09/2014, after Resident #1 eloped, the Administrator, DON, and Director of Maintenance met and developed a corrective action plan. However, the Administrator documented that there had been no meeting of the QA/PI Committee related corrective action plan. However, the Administrator documented that there had been no meeting of the QA/PI Committee related the 02/09/2014 elopement of Resident #1 until 02/18/2014, and acknowledged that it was not until that date (some nine (9) days after the incident involving Resident #1's elopement and injury) that the QA/PI Committee had conducted an analysis of the elopement of Resident #1, and had reviewed and evaluated the corrective actions, which included procedural changes and staff in-service training, which had been developed and put into place by the Administrator, DON, and Director of Maintenance. No evidence was presented by the facility to indicate that the QA/PI Committee had been involved in the formulation of the corrective action plan, developed and put into place by management staff as a result of the 02/09/2014 elopement of Resident #1, to evaluate the effectiveness of the corrective actions in assuring the supervision of residents at risk for elopement. Instead, this corrective action plan was developed and implemented in the absence of input by the OA/PI Committee and without oversight by the Committee risk plan implementation. By the time the OA/PI Committee at risk for elopement. Instead, this corrective action plan was developed and implemented in the absence of input by the QA/PI Committee, and without oversight by the Committee, prior to plan implementation. By the time the QA/PI Committee met on 02/18/2014 to review the plan of action, originally developed on 02/09/2014 by facility management staff and which involved procedural modifications related to the facility's WanderGuard alert system, 116 of the facility's 118 employees (as documented in the facility's credible allegation of jeopardy removal) had already received inservice training regarding these procedural changes. The immediate jeopardy was determined to have been removed on February 19, 2014, at which time the facility had presented and implemented a credible allegation of jeopardy removal with the following interventions: A. On February 9, 2014, after learning of Resident #1's elopement, the facility conducted a full resident audit to assure the presence of all residents. B. On February 9, 2014, all doors exiting the nursing facility were checked to ensure the proper working order of the WanderGuard alarm system. All existing WanderGuard alarms were functioning properly. C. On February 9, 2014, a procedure was put into place by which a facility employee was placed at the doorway, located in the corridor leading from the nursing facility to the hospital, which was not equipped with a WanderGuard alarm. A scheduled was developed reflecting specific employees who were assigned to be in place at the unalarmed doorway, at specific times and continuously around the clock, until a WanderGuard alarm was installed on the doorway. D. On February 9, 2014, chart audits for all current facility residents were conducted to ensure that all residents who demonstrated a potential for elopement had been accurately identified by the facility. During these chart audits, no new residents were identified to have the potential for elopement. E. On February 9, 2014, Care Plan reviews were conducted for residents assessed Activities Director which were in place prior to Resident #1's elopement, the facility implemented audits of the door alarms through the preventative maintenance program. The door alarms would be checked weekly, on each Tuesday, by the Maintenance Director, and these door alarm checks would be documented via computer data entry. The door alarm test wou include a check of the power indicator light to ensure proper function, and also a check for battery condition. A sensor include a check of the power indicator light to ensure proper function, and also a check for battery condition. A sensor button was to be used to test each door alarm, with the alarm to sound when within six feet of an alarmed doorway. If a door alarm did not initially sound, the test was to be repeated with a different sensor button. Any deviation from full working order found during these weekly door alarm checks would be reported to the Administrator for immediate correction. The Administrator or DON would monitor the results of these weekly door alarm audits, conducted by the Maintenance Director, by reviewing the computer data entered as a result of the door alarm checks weekly for four (4) weeks, then monthly for three (3) months, then quarterly thereafter. The results of these supervisory audits will be submitted to the Quality Assessment/Performance Improvement (QA/PI) Committee for their review. G. On February 9, 2014, the facility contacted the Medical Director to inform him of the elopement of Resident #1. Additionally, a meeting which consisted of some members of the QA/PI Committee, including the Administrator, DON, and Director of Maintenance, was held to review the elopement event and the actions which had been taken by the facility, and to identify any additional actions that were needed. H. On February 15, 2014, the corridor doorway, which lead from the nursing facility to the hospital and which had previously lacked a WanderGuard alarm, was equipped with a WanderGuard alarm. I. On February 18, 2014, the facility continued to provide staff in-service training to facility staff, including licensed nurses, CNAs, and continued to provide staff in-service training to facility staff, including licensed nurses, CNAs, and maintenance/housekeeping staff. This in-service training served to both reinforce current facility protocols involving the routine monitoring of residents having WanderGuard bracelet devices and also to provide staff training on newly-implemented protocols related to the facility's WanderGuard alarm system. As of February 18, 2014, 116 of the facility's total 118 employees had received this in-service training. The two (2) remaining staff members, who were on Family and Medical Leave Act leave at the time this in-service training was provided, will received the training upon their return to work. J. On

DEPARTMENT OF HEALTH CENTERS FOR MEDICARE &				PRINTED:9/5/2014 FORM APPROVED OMB NO. 0938-0391
STATEMENT OF	(X1) PROVIDER / SUPPLIER	(X2) MULTIPLE CONSTRUCT	TION	(X3) DATE SURVEY
DEFICIENCIES AND PLAN OF	/ CLIA	A. BUILDING B. WING		COMPLETED
CORRECTION	NUMBER	b. wind		02/20/2014
	115714		I	
NAME OF PROVIDER OF SUI			STREET ADDRESS, CITY, STA	·
NORTHRIDGE HEALTH AN	D REHABILITATION		100 MEDICAL CENTER DRIV COMMERCE, GA 30529	/ E
For information on the nursing l	home's plan to correct this deficience	cy, please contact the nursing hor	me or the state survey agency.	
(X4) ID PREFIX TAG	OR LSC IDENTIFYING INFORM		ENCY MUST BE PRECEDED BY	FULL REGULATORY
F 0520			nent event involving Resident #1,	
Level of harm - Immediate jeopardy			s put into place as a result of the el- t monitoring and door alarm audits	
Residents Affected - Some	then monthly for three (3) months	s, then quarterly thereafter to ensu	are ongoing compliance with the sy. The information will be analyzed	stemic measures
Residents Affected Some	Committee, and subsequent plans	of correction will be developed a	and implemented as needed. This v	vill be an ongoing process.
	of the deficient practice was remo	ved on February 19, 2014. Howe	ever, the effectiveness of the correct	tive action plans could
	audit of WanderGuard door alarm	is to be accomplished through the	 On February 9, 2014, the facility e preventative maintenance prograr 	n by the Maintenance
			eck for the proper function of all fa ever, these weekly WanderGuard d	
	initiated only on February 9, 2014	, and had occurred only twice pr	ior to the February 20, 2014 exit demented procedure involving routing	ate of this complaint
	door alarm monitoring could not b	be entirely assessed at the time of	f survey completion, and will thus mpleted in-service training for 116	need future
	employees, to include licensed nu	rses, CNAs, and maintenance/ho	susekeeping staff, regarding both exts with WanderGuard bracelets and	sisting and
	system. However, two (2) remaini	ing staff members, who were on	leave and had been unavailable for	training, will need to
	Committee was to include the revi	iew the results of WanderGuard	thus need future evaluation. Additi bracelet monitoring and door alarm	audits in future
	this complaint survey, to begin thi	is process. Thus, the QA/PI Com	nly two (2) days prior to the Februa mittee's ongoing process of facility	procedural oversight
	could not be evaluated at the time severity is reduced to the E level.		e, the non-compliance continues, bu	at the scope and

FORM CMS-2567(02-99) Event ID: YL1O11 Facility ID: 115714 If continuation sheet Page 9 of 9