POC accepted 8/25/2024

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Plan of Correction

Whitehall West Assisted Living Community — Facility Identification #D3518

Kimberly S. Keller, RN, Administrator — Survey Completed July 31, 2024

1. **A 303 420-5-4-.03 (2) (a) Administration**

2. On July 31, 2024, a 30-day notice was given to sponsors of, RI#3, RI#4, and RI#5, that due to a cognitive decline they were not able to pass the medication awareness testing to the degree that they were unable to identify or recognize their name or have an understanding of the facility unit dose medication system, and were not able to protect themselves from medication error by staff. The Administrator assisted the family in finding another level of care for these residents. RI#4 was already in the transfer process, awaiting a date for transfer to her new facility. RI# 4 transferred August 13, 2024, RI# 5 is scheduled for transfer on August 22, 2024, RI#3 is scheduled for transfer on August 23, 2024.

3. On August 1, 2024, Administrator and Wellness Nurse reviewed the files of all residents currently in the building for any that were identified as needing to move to another level of care. No other residents were identified.

4. The 30-day notice form is found within the facility Discharge Transfer policy. The Administrator will meet with current sponsors to remind them that at the time a resident is identified as no longer appropriate for the assisted living level of care, they will be asked to sign this form as acknowledgement of the 30-day discharge notice. Upon admission, The Administrator or Designee who is performing the admission process with new resident sponsors, will explain this process when reviewing the Discharge Transfer policy.

   Upon the identification of a resident who no longer meets the requirements of eligibility for the assisted living level of care, the Administrator or Designee will contact the sponsor to inform them of the change, assist in planning for the discharge and transfer as well as have the sponsor sign the 30-day notice form

5. The Administrative Assistant will review resident charts of all new residents within 30 days of admission to ensure the full Discharge Transfer policy is in the chart. This chart review will be documented on the Resident Chart Review form and filed in the QA folder.

1. **A 606 420-5-4-.06 (3) (d) Care of Residents**

2. On July 31, 2024, a 30-day notice was given to sponsors of, RI#3, RI#4, and RI#5, that due to a cognitive decline they were not able to pass the medication awareness testing to the degree that they were unable to identify or recognize their name or have an understanding of the facility unit dose medication system, and were not able to protect themselves from medication error by staff. RI#3 was not provided with a medication identification system for the visually impaired. Starting July 31, 2024, with afternoon med pass, a licensed staff, (Wellness Nurse or Administrator who is an RN), provided and will continue to provide medication administration to RI#3, RI#4, and RI#5, until their date of discharge. Per facility Discharge Policy, we are not able to retain such residents. The Administrator assisted the family in finding another level of care for these residents. RI#4 was already in the transfer process, awaiting a date for transfer to her new facility. RI# 4 transferred August 13, 2024. RI# 5 scheduled for transfer on August 22, 2024. RI#3 scheduled for transfer on August 23, 2024.

3. On August 5 and 6, 2024, Wellness Nurse performed Medication Awareness testing with the remaining residents. All other residents were found capable of recognizing his/her name, understanding the unit dose medication system and capable of protecting themselves from medication error by staff.

4. On August 26, the Administrative Team of Whitehall Assisted Living will meet to discuss changes in medication awareness training for residents, that is more appropriate for the new packaging system with Guardian Pharmacy, started on April 1, 2024. As well as new policies and procedures for medication awareness testing and identification of medications for those residents with impaired vision. The new Policy and Procedure based on the recommendations of this team will be developed and fully implemented by September 9, 2024, after all meetings and in-services have been held with residents and staff. During our next Resident Council meeting on September 4, 2024 (the first Wednesday of every month), the facility will review the medication assistance unit dose packaging system in place with the residents. A sign-in sheet of those in attendance will be placed in the Survey Binder in the Administrator's office.

   Medication Awareness testing is already a component of the Monthly Resident Assessment performed by the Wellness Nurse. Monthly Medication Awareness testing will be modified to include asking the resident to recognize their name, the date, and the time of the medication. Residents will be informed of the day's date and time of the medication pass. (Ex. Good morning Mrs. Smith today is August 21, 2024, I have your 8am medications. Can you please verify this information on the package.) The current Medication Awareness testing policy specifies that all Resident Attendants are to require residents to identify their medications at each medication pass. Residents that may indicate changes to their ability to identify their medications are to be reported to

the Administrator. This policy also indicates that the Wellness Nurse is required to report any resident who is having difficulty with medication awareness to the Administrator. The Wellness Nurse will perform refresher training to all Resident Attendants on the proper method for Medication Assistance including offering the opportunity for all residents to identify their medication at each medication pass. This training will be documented on the Resident Attendant skills observation form and completed within the next 30 days. The Wellness Nurse will observe each Resident Attendant for compliance with medication awareness testing at each medication pass monthly for 3 months and then during the quarterly Resident Attendant Skills Observation. The Administrator will review with all Resident Attendants the Medication Awareness testing policy and the requirement to inform the Administrator of any changes in a resident's ability to recognize their medication.

The Wellness Nurse and Administrator will review the Resident Care Communication Log daily for any changes in resident care noted. If indicated, the Wellness Nurse will perform immediate Medication Awareness Testing on residents with possible changes in cognition or vision and make changes as required.

5. The Administrator will review Monthly Resident Assessments to ensure the Wellness Nurse has evaluated them for Medication Awareness and that they remain appropriate for the assisted living level of care. Focusing on residents who have had a decline in health or that may need a more individualized medication awareness plan, such as a plan for impaired vision.

   The Wellness Nurse will evaluate each Resident Attendant and their compliance with the medication awareness testing during the medication pass while performing the Resident Attendant Skills Observation monthly for 3 months and then quarterly. Resident Attendants not following the procedure will be counseled and have refresher training as needed. This will be documented on the Resident Attendant Skills Observation form. The Administrator will review Resident Attendant Skills Observation forms to ensure Resident Attendants are being evaluated on compliance with policies and are in compliance. If refresher training is required, the Wellness Nurse will be directed to provide such training, as necessary.

1. **A 613 420-5-4-.06 (5) (a) (b) (c) (d) (e) Care of Residents**

2. On July 31, 2024, a 30-day notice was given to sponsors of, RI#3, RI#4, and RI#5, that due to a cognitive decline they were not able to pass the medication awareness testing to the degree that they were unable to identify or recognize their name or have an understanding of the facility unit dose medication system, and were not able to protect themselves from medication error by staff. as RI#3, was not provided with a medication identification system for the visually impaired. Starting July 31, 2024, with afternoon med pass, a licensed staff, (Wellness Nurse or Administrator who is an RN),

provided and will continue to provide medication administration to RI#3, RI#4, and RI#5, until their date of discharge. Per facility Discharge Policy, we are not able to retain such residents. The Administrator assisted the family in finding another level of care for these residents. RI#4 was already in the transfer process, awaiting a date for transfer to her new facility. RI# 4 transferred August 13, 2024. RI# 5 scheduled for transfer on August 22, 2024. RI#3 is scheduled for transfer on August 23, 2024.

3. On August 5 and 6, 2024, Wellness Nurse assessed the remaining residents, found all capable of recognizing his/her name, understanding the unit dose medication system and capable of protecting themselves from medication error by staff.

4. On August 26, the Administrative Team of Whitehall Assisted Living will meet to discuss changes in medication awareness training for residents, that is more appropriate for the new packaging system with Guardian Pharmacy, started on April 1, 2024. As well as new policies and procedures for medication awareness testing and identification of medications for those residents with impaired vision. The new Policy and Procedure based on the recommendations of this team will be developed and fully implemented by September 9, 2024, after all meetings and in-services have been held with residents and staff. During our next Resident Council meeting on September 4, 2024 (the first Wednesday of every month), the facility will review the medication assistance unit dose packaging system in place with the residents. A sign-in sheet of those in attendance will be placed in the Survey Binder in the Administrator's office.

   The Wellness Nurse is required to perform Medication Awareness Testing as part of the monthly Resident Assessment and at other times as indicated by a change in resident condition. Resident Attendants are also required to provide residents with the opportunity to identify their medications at every med pass. The Wellness Nurse will provide training to every Resident Attendant on proper medication awareness testing during medication pass within the next 30 days. The Wellness Nurse will evaluate each Resident Attendant on their compliance with medication awareness testing at the time of medication assistance monthly for the next 3 months and there after quarterly as part of the regular Resident Attendant Skills Training Observation. Should a resident be found to not be able to protect themselves from medication error, the Administrator will be notified immediately. The Administrator will notify the sponsor of the resident not meeting the eligibility for the assisted living level of care and be asked to sign the 30-day Notice Discharge Form.

   The Administrator and Wellness Nurse will review the Resident Care Communication Log daily for any changes in resident care that may impact their ability to identify their medication daily.

   The facility Admission Agreement will be updated to include that any services outside the assisted living level of care required may require the sponsor to pay for additional services until such time as the resident is moved to the appropriate level of care, but in no case longer than 30 days. The facility

will assist families in obtaining these services by providing a list of sitters, private duty nurses, etc. The facility will maintain a copy of the license or agreement for any outside service being performed in the facility as well as a copy of the nurse aid registry check. The Resident Plan of Care will include any outside services being performed in the facility.

5. The Administrator will review Monthly Resident Assessments to ensure the Wellness Nurse has evaluated them for Medication Awareness and that they remain appropriate for the assisted living level of care. Focusing on residents who have had a decline in health or that may need a more individualized medication awareness plan, such as a plan for impaired vision.

   The Administrative staff will review resident charts monthly to ensure any outside services required are included in the Resident Care Plan and will document them on the chart audit form. The Administrator will review Resident Attendant Skills Observation forms to ensure Resident Attendants are being evaluated on compliance with policies and are in compliance. If refresher training is required, the Wellness Nurse will be directed to provide such training, as necessary. The Administrator will review Monthly Resident Assessments to ensure the Wellness Nurse has evaluated them for Medication Awareness and that they remain appropriate for the assisted living level of care

1. **A 614 420-5-4-.06 (5) (f) (g) (6) (7) (a)-(i) Care of Residents**

2. On July 31, 2024, a 30-day notice was given to sponsor of, RI#3 that they were unable to identify or recognize their name and were not able to protect themselves from medication error by staff. RI#3 was not provided with a medication identification system for the visually impaired. Starting July 31, 2024, with afternoon med pass, a licensed staff, (Wellness Nurse or Administrator who is an RN), provided and will continue to provide medication administration to RI#3, until their date of discharge. Per facility Discharge Policy, we are not able to retain such residents. The Administrator assisted the family in finding another level of care for this resident. RI#3 is scheduled for transfer on August 23, 2024.

3. On August 5 and 6, 2024, Wellness Nurse assessed the remaining residents, found all capable of recognizing his/her name, understanding the unit dose medication system and capable of protecting themselves from medication error by staff.

4. On August 26, the Administrative Team of Whitehall Assisted Living will meet to discuss changes in medication awareness training for residents that is more appropriate for the new packaging from the new pharmacy, as well as new policies and procedures for medication awareness testing and identification of medications for those residents with impaired vision. The new Policy and Procedure based on the recommendations of this team will be developed and fully implemented by August 30, 2024. During our next Resident Council meeting on September 4, 2024 (the first Wednesday of

every month), the facility will review the medication assistance unit dose packaging system in place with the residents. A sign-in sheet of those in attendance will be placed in the Survey Binder in the Administrator's office.

Medication Awareness testing monthly by Wellness Nurse will include verification by the resident visually or by another means if vision impaired that they can protect themselves from medication errors. Resident Attendants must give every resident the opportunity to identify their medication at every medication pass. The Wellness Nurse will perform refresher training on Medication Awareness testing for every Resident Attendant within the next 30 days. The Wellness Nurse will also observe the proper implementation of the Medication Awareness testing on every Resident Attendant within the next 30 days and document on the Resident Attendant Skills Observation Form.

The Wellness Nurse and Lead Resident Attendant will review all medication packs for visually impaired residents at the time of delivery to ensure any additional identification measures are in place before medications are placed in the med cart. Examples could be but not limited to larger font of name or a textile identification such as sandpaper or a rough sticker.

5. The Administrator will review Monthly Resident Assessments to ensure the Wellness Nurse has evaluated them for Medication Awareness and that they remain appropriate for the assisted living level of care. Focusing on residents who have had a decline in health or that may need a more individualized medication awareness plan, such as a plan for impaired vision.

   The Administrator will review Resident Attendant Skills Observation forms to ensure Resident Attendants are being evaluated on compliance with policies and are in compliance. If refresher training is required, the Wellness Nurse will be directed to provide such training, as necessary. The Administrator will review Monthly Resident Assessments to ensure the Wellness Nurse has evaluated them for Medication Awareness and that they remain appropriate for the assisted living level of care.

Respectfully Yours,

Kimberly S. Keller, RN

Kimberly S. Keller, RN
Whitehall West Assisted Living Administrator
8-21-2024