

Health Regulation & Licensing Administration

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: HCA-0077	(X2) MULTIPLE CONSTRUCTION A. BUILDING: _____ B. WING: _____		(X3) DATE SURVEY COMPLETED 07/28/2016
NAME OF PROVIDER OR SUPPLIER NATION'S HOME INFUSION, LLC		STREET ADDRESS, CITY, STATE, ZIP CODE 2200 PENNSYLVANIA AVENUE, NW, 4TH FLOOR, STE 41 WASHINGTON, DC 20037			
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)		ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE DEFICIENCY)	(X5) COMPLETE DATE
H 000	INITIAL COMMENTS		H 000		
	<p>A full initial licensure survey was conducted from July 27, 2016, through July 28, 2016, to determine compliance with Title 22B DCMR, Chapter 39 (Home Care Agencies Regulations). The Home Care Agency provides home care services to eight (8) patients and employs two (2) registered nurses. The findings of the survey were based on observations, record reviews and interviews with current patients and staff.</p> <p>The following are abbreviations used within the body of this report: DON - Director of Nursing GM - Gram HCA - Home Care Agency IV - Intravenous ml - Milli-liter POC - Plan of Care PRN - As Necessary SNV - Skilled Nursing Visit VNA - Visiting Nurse Association</p>				
H 355	3914.3(d) PATIENT PLAN OF CARE		H 355		
	<p>The plan of care shall include the following:</p> <p>(d) A description of the services to be provided including: the frequency, amount, and expected duration; dietary requirements, medication administration, including dosage; equipment; and supplies;</p> <p>This Statute is not met as evidenced by: Based on record review and interview, the HCA failed to ensure the Plan of Care described services to be provided including the expected duration of the HCA services, dietary</p>				

Health Regulation & Licensing Administration
LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE

TITLE

(X8) DATE

STATE FORM

8599

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If continuation sheet 1 of 11

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H 355

Continued From page 1

requirements and medication administration dosages for five (5) of five (5) patients in the sample. (Patients #1, #2, #3, #4 and #5)

The findings include:

1. On July 27, 2016, at 10:00 a.m., review of Patient #1's medical record revealed a POC with a certification period of July 22, 2016, through October 21, 2016. The POC revealed that Patient #1 was to be provided "SNV one to two (1-2) times a week and PRN for on-going training/assessment." The POC failed to evidence the duration of the SNV service. Additionally, the POC failed to include the dietary requirements for the patient.
2. On July 27, 2016, at 11:15 a.m., review of Patient #2's medical record revealed a POC with a certification period of July 14, 2016, through October 13, 2016. The POC revealed that Patient #2 was to be provided "SNV one to two (1-2) times a week and PRN for on-going training/assessment." The POC failed to evidence the duration of the SNV service. Additionally, the POC failed to include the dietary requirements for the patient, the type of antimicrobial to be administered including dosage, equipment and supplies.
3. On July 27, 2016, at 12:40 p.m., review of Patient #3's medical record revealed a POC with a certification period of July 23, 2016, through October 22, 2016. The POC revealed that Patient #3 was to be provided "SNV one to two (1-2) times a week and PRN for on-going training/assessment." The POC failed to evidence the duration of the SNV service. Additionally, the POC failed to include the dietary requirements for the patient, the type of

H 355

H355: 3914.3(d) – Failure to include the dietary requirements for the patient.

During the review of each patient chart audited by Mr. Donald Teekasingh RN, MBA, it was found that when the dietary requirements space on the POC was blank, it was not entered into our software program– CPR+: Patient Demographic Information Sheet was not completed in its entirety. If the main patient information sheet is not filled out by correctly the Intake Clinical Coordinators, elements including:

1. Diet
2. Mental Status (Psychosocial)
3. Functional Limitations
4. Safety Measures (Emergency Protocols)
5. Rehabilitation Potential
6. Prognosis
7. Allergies
8. IV Access
9. Activity
10. Height and Weight

they do not transfer appropriately to the POC leaving the corresponding "space" on the POC without the required information.

Corrective Action:

An Intake Staff meeting is scheduled for 8/30/2016 to remind the intake team to complete the Patient Demographic Information Sheet and the ramifications of incomplete work. A PI Measurement Tool has been created and will be monitored effective September 1, 2016 and on-going x 1 year for all NHI POC's. This PI Tool will cross-reference the completeness of the Patient Demographic Information Sheet in correlation to the completeness of the POC.

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H 355 Continued From page 2

antimicrobial to be administered including dosage, equipment and supplies.

4. On July 27, 2016, at 2:00 p.m., review of Patient #4's medical record revealed a POC with a certification period of July 23, 2016, through October 22, 2016. The POC revealed that Patient #4 was to be provided "SNV one to two (1-2) times a week and PRN for on-going training/assessment." The POC failed to evidence the duration of the SNV service. Additionally, the POC failed to include the dietary requirements for the patient, the type of antimicrobial to be administered including dosage, equipment and supplies.

5. On July 27, 2016, at 2:45 p.m., review of Patient #5's medical record revealed a POC with a certification period of July 15, 2016, through October 14, 2016. The POC revealed that Patient #5 was to be provided "SNV one to two (1-2) times a week and PRN for on-going training/assessment." The POC failed to evidence the duration of the SNV service.

On July 27, 2016, at 2:45 p.m., interview with the company's Vice President of Reimbursement revealed that the POC is computer generated. Additionally, he/she stated that their company will contact the software company to ensure their POC is capable of capturing all the requirements of the regulations.

H 358 3914.3(g) PATIENT PLAN OF CARE

The plan of care shall include the following:

(g) Physical assessment, including all pertinent diagnoses;

H 355

H358 3914.3(9)

In private discussion with the Reimbursement Specialist, with many years of ICD code entering, it has been determined that in the hurriedness of the day and the number of codes to choose from, she has been focusing on entering one or two codes correctly. The VP of Reimbursement will be monitoring the ICD-10 codes daily, as this has been determined not to be a lack of knowledge, but a time factor. New ICD-10 coding books were ordered and the arrival date is within the next 10 days. The VP of Reimbursement will also be printing a daily ICD-10 patient report and correcting and adding codes to the patient clinical record as appropriate.

H 358

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H 358 Continued From page 3

This Statute is not met as evidenced by:
Based record review and interview, the POC failed to include all pertinent diagnoses for two (2) of five (5) patients in the sample. (Patient #1 and #2)

The findings include:

1. On July 27, 2016, at 10:00 a.m., review of Patient #1's medical record revealed a POC with a certification period of July 22, 2016, through October 21, 2016. The POC revealed that Patient #1 had a diagnosis of "Cellulitis of other sites."

A home visit was conducted to Patient #1 on July 28, 2016, at 10:00 a.m. Interview with Patient #1 on July 28, 2016, at 10:00 a.m., revealed that the patient also had a diagnosis of "Insulin dependent diabetes mellitus." The POC failed to mention the diabetic diagnosis.

2. On July 27, 2016, at 11:15 a.m., review of Patient #2's medical record revealed a POC with a certification period of July 14, 2016, through October 13, 2016. The POC revealed that Patient #2 had a diagnosis of "Other acute osteomyelitis, unspecified site."

On July 29, 2016 at 10:30 a.m., during a telephone interview with the patient it was determined that the patient also had a diagnosis of "healing stage 4 sacral decubitus." The POC failed to mention the wound diagnosis.

On July 27, 2016, at 2:45 p.m., interview with the company's Vice President of Reimbursement revealed that the POC is computer generated. Additionally, he/she stated that their company will

H 358

Corrective Action: On-going ICD-10 code review by the VP of Reimbursement until deemed unnecessary.

As per section: H355: 3914.3(d) – Failure to include the dietary requirements for the patient.
H359 3914.3(h) – Prognosis—and to the accuracy with which the information

on the Patient Demographic Information Sheet is entered into the computer. If it is entered correctly, the prognosis will appear on the on the POC. Other elements captured by the Patient Demographic Information Sheet include:

1. Diet
2. Mental Status (Psychosocial)
3. Functional Limitations
4. Safety Measures (Emergency Protocols)
5. Rehabilitation Potential
6. Prognosis
7. Allergies
8. IV Access
9. Activity
10. Height and Weight

Corrective Action:

An Intake Staff meeting is scheduled for 8/30/2016 to remind the intake team to complete the Patient Demographic Information Sheet and the ramifications of incomplete work. A PI Measurement Tool has been created and will be monitored effective September 1, 2016 and on-going x 1 year for all NHI POC's. This PI Tool will cross-reference the completeness of the Patient Demographic Information Sheet in correlation to the completeness of the POC.

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H 358	Continued From page 4 contact the software company to ensure their POC is capable of capturing all the requirements of the regulations.	H 358		
H 359	3914.3(h) PATIENT PLAN OF CARE The plan of care shall include the following: (h) Prognosis, including rehabilitation potential; This Statute is not met as evidenced by: Based on record review and interview, the HCA failed to document the prognosis on the POC for five (5) of five (5) patient's in the sample. (Patient's #1, #2, #3, #4 and #5) The findings include: Review of POCs of Patient's #1, #2, #3, #4 and #5 on July 27, 2016, between the hours of 11:00 a.m. and 3:00 p.m., revealed the POCs failed to include provisions for the patients' prognosis. On July 27, 2016, at 3:00 p.m., interview with the company's Vice President of Reimbursement revealed that the POC is computer generated. Additionally, he/she stated that their company will contact the software company to ensure their POC is capable of capturing all the requirements of the regulations.	H 359		
H 361	3914.3(j) PATIENT PLAN OF CARE The plan of care shall include the following: (j) Psychosocial needs of the patient;	H 361	H361 3914.3(j) – Psychosocial Needs or Mental Status and H364 3914.3(m) -- Emergency Protocols or Safety Measures As per above related to Prognosis and Dietary Requirements. NHI's data input on the Patient Demographic Information Sheet crosses over significantly to the POC. Our Corrective Action remains the same.	

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H 361	Continued From page 5 This Statute is not met as evidenced by: Based on record review and interview, the HCA failed to document the psychosocial needs on the POC for five (5) of five (5) patient's in the sample. (Patient's #1, #2, #3, #4 and #5) The findings include: Review of POCs of Patient's #1, #2, #3, #4 and #5 on July 27, 2016, between the hours of 11:00 a.m. and 3:00 p.m., revealed the POCs failed to include the psychosocial needs of the patients'. On July 27, 2016, at 3:00 p.m., interview with the company's Vice President of Reimbursement revealed that the POC is computer generated. Additionally, he/she stated that their company will contact the software company to ensure their POC is capable of capturing all the requirements of the regulations.	H 361		
H 364	3914.3(m) PATIENT PLAN OF CARE The plan of care shall include the following: (m) Emergency protocols; and... This Statute is not met as evidenced by: Based on record review and interview, the HCA failed to document emergency protocols on the POC for five (5) of five (5) patient's in the sample. (Patient's #1, #2, #3, #4 and #5) The findings include: Review of POCs of Patient's #1, #2, #3, #4 and #5 on July 27, 2016, between the hours of 11:00 a.m. and 3:00 p.m., revealed the POCs failed to	H 364		

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H 364	Continued From page 6 include the emergency protocols. On July 27, 2016, at 3:00 p.m., interview with the company's Vice President of Reimbursement revealed that the POC is computer generated. Additionally, he/she stated that their company will contact the software company to ensure their POC is capable of capturing all the requirements of the regulations.	H 364		
H 433	3916.2(c) SKILLED SERVICES GENERALLY Each home care agency shall develop written policies for documenting the coordination of the provision of different services. Written policies shall include, at a minimum, the following: (c) Coordinating services with other agencies actively involved in the patient's care, through written communication and/or interdisciplinary conferences, in accordance with the patient's needs; and... This Statute is not met as evidenced by: Based on record review and interview it was determined that the agency failed to document coordination of services between two home care agencies providing care to one (1) of five (5) patients in the sample. (Patient #2) The finding includes: On July 27, 2016, at 11:45 a.m., review of Patient #2's clinical record revealed a POC with a certification period of July 14, 2016, through October 13, 2016, that contained a diagnosis of "Other acute osteomyelitis, unspecified site." Further review of the clinical record revealed a	H 433	H433 3916.2(c) Skilled Services Generally NHI failed to document coordination of services between one homecare agency and NHI. During the review of this case with the Intake Coordinator, it was determined that the VNA was staffed four days into the SOC (four days after NHI had initiated the IV ABX therapy) and the Intake Coordinator was not aware which HHA was chosen to provide care for the sacral decubitus by the hospital Discharge Coordinator. The Intake Coordinator verbalizes she knew an agency needed to be in this home but did not follow-up with the patient or NHI primary RN to enter the HHA into the computer system. Corrective Action: This employee has been reminded about the timeliness of data entry and on-going follow-up required to complete a referral. We will continue to monitor and track timeliness of data entry.	

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H 433

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nursing note dated July 14, 2016, indicating that the patient had a sacral wound. There was no documented evidence in the nursing notes regarding care to the sacral wound.

On July 27, 2016, at 3:00 p.m., interview with the Vice President of Reimbursement revealed that the agency did not provide wound care to the sacral wound. The Vice President of Reimbursement could not state what agency provided care to the sacral wound.

On July 29, 2016, at 10:30 a.m., telephone interview with Patient #2 revealed that the VNA was providing wound care to his/her stage 4 sacral decubitus. The patient further stated that he/she was very pleased with the services of the HCA providing the intravenous therapy.

On July 29, 2016, at 11:30 a.m., telephone interview with the Vice President of Reimbursement revealed that the HCA failed to coordinate care with the VNA.

H 433

H 491

3920.2(a) INTRAVENOUS THERAPY SERVICES

The intravenous therapy service plan shall include, at a minimum, the following:

(a) Type, amount, flow rate, duration, and mode of administration of nutritional formula or intravenous solution;

This Statute is not met as evidenced by:
Based on record review and interview it was determined that the agency failed to include the flow rate and duration of the nutritional formula in its POC for one (1) of five (5) patients in the

H 491

H491 3920.2(a) and H492 3920.2(b)
A complete "over haul" of the POC electronic templates is actively occurring, which will include a prompt to manually enter all prescriptions including TPN and all nutrition, to include (a) Type, amount, flow rate, duration, and mode of administration of nutritional formula or intravenous solution; and all ABX, Hydration, IVIG, Chemotherapy, Steroid Therapy and Inotropic Therapy to include (b) Type, dosage, frequency, duration, and mode of administration of therapy.

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sample. (Patient #5)

The finding includes:

On July 27, 2016, at 2:45 p.m., review of Patient #5's medical record revealed a POC with a certification period of July 15, 2016, through October 14, 2016. Further review of the clinical record revealed that Patient #5 was to receive "Total Parenteral Nutrition" (TPN) "1110 ml IV daily" but failed to evidence the flow rate and duration of formula.

On July 27, 2016, at 2:45 p.m., interview with the company's Vice President of Reimbursement revealed that the POC is computer generated. Additionally, he/she stated that their company will contact the software company to ensure their service plan is capable of capturing all the requirements of the regulations.

H 491

Corrective Action: As per above. In addition, a new PI Measurement indicator has been created to address the new POC templates and the requirement to manually enter the medication prescriptions. This indicator will be effective September 1, 2016 x 1 year.

Respectfully Submitted,
Tracy Campbell
VP of Reimbursement
Latina Paul RN, BSN
Director of Nursing

H 492 3920.2(b) INTRAVENOUS THERAPY SERVICES

H 492

The intravenous therapy service plan shall include, at a minimum, the following:

(b) Type, dosage, frequency, duration, and mode of administration of medication;

This Statute is not met as evidenced by:
Based on record review and interview, the HCA failed to ensure each POC included the type, dosage, frequency, duration and mode of administration of medication for four (4) of five (5) patients in the sample. (Patients #1, #2, #3 and #4)

The findings include:

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H 492 Continued From page 9

H 492

1. On July 27, 2016, at 10:00 a.m., review of Patient #1's medical record revealed a POC with a certification period of July 22, 2016, through October 21, 2016. Further review of the POC revealed that Patient #1 was to receive "Ceftriaxone 2GM IV every 24 hours" but failed to evidence the duration of the antimicrobial therapy.

2. On July 27, 2016, at 11:15 a.m., review of Patient #2's medical record revealed a POC with a certification period of July 14, 2016, through October 13, 2016. Further review of the POC revealed that Patient #2 was to be provided "Antimicrobial Therapy: See Prescriptions" but failed to evidence the type, dosage, frequency and duration of the medication (antimicrobial) to be administered.

3. On July 27, 2016, at 12:40 p.m., review of Patient #3's medical record revealed a POC with a certification period of July 23, 2016, through October 22, 2016. Further review of the POC revealed that Patient #3 was to be provided "Antimicrobial Therapy: See Prescriptions" but failed to evidence the type, dosage, frequency and duration of the medication (antimicrobial) to be administered.

4. On July 27, 2016, at 2:00 p.m., review of Patient #4's medical record revealed a POC with a certification period of July 23, 2016, through October 22, 2016. Further review of the POC revealed that Patient #4 was to be provided "Antimicrobial Therapy: See Prescriptions" but failed to evidence the type, dosage, frequency and duration of the medication (antimicrobial) to be administered.

On July 27, 2016, at 2:45 p.m., interview with the

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H 492	Continued From page 10 company's Vice President of Reimbursement revealed that the POC is computer generated. Additionally, he/she stated that their company will contact the software company to ensure their Service Plan is capable of capturing all the requirements of the regulations.	H 492		