

Health Regulation & Licensing Administration

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: CPA-0086	(X2) MULTIPLE CONSTRUCTION A. BUILDING: _____ B. WING: _____	(X3) DATE SURVEY COMPLETED R 04/10/2014
NAME OF PROVIDER OR SUPPLIER UMBRELLA THERAPEUTIC SERVICES		STREET ADDRESS, CITY, STATE, ZIP CODE 3300 PENNSYLVANIA AVE SE WASHINGTON, DC 20020		
(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
{S 000}	Initial Comments A monitoring visit was conducted on April 9 and 10, 2014, to ascertain compliance with Title 29 Chapter 16, Standards of Placement, Care and Services. The findings were based on telephone and onsite interviews with the chief executive officer and employees, review of four (4) personnel records based on a census of four (4) employees, as well as review of administrative records. Note: The below are abbreviations that may appear throughout the body of this report. Chief Executive Officer - CEO Child Placing Agency - CPA Electronic Mail - email Executive Director - ED Federal Bureau of Investigation - FBI Health Regulation and Licensing Administration - HRLA Metropolitan Police Department - MPD	{S 000}		
S 011	1602.5 BOARD OF DIRECTORS Members of the Board shall be of good character as determined by letters of reference and criminal background investigations. This CONDITION is not met as evidenced by: Based on record review and interview, the Child-Placing agency failed to ensure members of the board were of good character as determined by letters of reference and criminal background investigations for active board members. (Note: the current number of board members was not made known during the survey.)	S 011	Criminal Background Checks on Board Members: Umbrella failed to secure criminal background on the Board members in a timely manner. Once notified of the requirement, Umbrella immediately secured Criminal Background Checks on all Board members by April 14, 2014. All Members were cleared of any criminal history. In the future, no employee or Board Member will proceed with employment/responsibilities until a Criminal Background Check has been conducted and verified by Umbrella Human Resources.	April 14, 2014

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

TITLE

(X6) DATE

STATE FORM

0800

BJOK12

If continuation sheet 1 of 4

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S 011	<p>Continued From page 1</p> <p>The finding includes: .</p> <p>On April 10, 2014, at approximately 11:30 a.m., telephone interview with the agency's CEO revealed that he was in possession of the records maintained for the CPA's board of directors. He further indicated that he was traveling out of state and would forward the requested information via email by 12:00 p.m. the following day (April 11, 2014). On April 10, 2014, at 12:50 p.m., HRLA sent him an email that listed the documentation needed to complete the survey, including evidence that letters of reference and criminal background investigations had been obtained for each board member.</p> <p>A follow-up telephone interview with the CEO on April 11, 2014, beginning at 11:24 a.m., revealed that to date the CPA had not obtained criminal background investigations for any of the CPA's board members. The CEO further sought clarification regarding the type of background checks that were needed.</p> <p>At the time of the survey, there was no evidence that the CPA was in compliance with this regulation.</p> <p>[Note: On April 14, 2014, at 3:15 p.m., the CPA's CEO and their ED came to the HRLA office to meet with the survey team and their supervisor. The CEO presented MPD and FBI criminal background checks for 4 of the 5 board members. The background checks were all dated April 14, 2014. The CEO also presented reference check forms for the same 4 board members. Review of the forms, however, revealed that they had not been signed or dated and there was no evidence that the references</p>	S 011	<p>References: Umbrella failed to secure complete references on all of its Board members in a timely manner. Once notified of the requirement, Umbrella immediately secured references for its Board Members. These references will be verified by Umbrella Human Resources by May 1, 2014 and documented on the reference form. In the future, no employee or Board Member will proceed with employment/responsibilities until 3 references have been secured and verified by Umbrella Human Resources.</p>	May 1, 2014

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S 011	Continued From page 2 had been checked.]	S 011			
S 018	1604.1 Organizational Table Each child-placing agency shall maintain a current organizational table showing the administrative structure and staffing of the agency, including the lines of authority. This CONDITION is not met as evidenced by: Based on record review and interview, the CPA failed to show evidence of a current organizational table showing the administrative structure and staffing, including the lines of authority, for four (4) of the four (4) employees. The finding includes: On April 10, 2014, at approximately 3:20 p.m., interview with the CPA's designated ED revealed that the organizational chart that was submitted as part of the initial licensure package had been revised. There was no revised organizational chart presented for review. At the time of the survey, there was no evidence that the CPA had updated its organizational table. [Note: On April 14, 2014, at 3:15 p.m., the CPA's CEO and their ED came to the HRLA office to meet with the survey team and their supervisor. The ED presented an updated Organizational Chart, dated April 10, 2014.]	S 018	Organizational Chart: The original organizational chart submitted by Umbrella Therapeutic Services was with the application for license. Since that time, there have been some minor changes to the organizational chart. On April 14, 2014, a new organizational chart was submitted to DOH. In the future, if there are any changes or additions to the organizational chart, a revised copy will be dated and kept in an administrative file in the Umbrella office. A copy will also be made available to the DOH for review.		April 14, 2014
S 095	1611.1(c) Personnel Records (c) At least three (3) letters of reference;	S 095			

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S 095	<p>Continued From page 3</p> <p>This CONDITION is not met as evidenced by: Based on record review and interview, the agency failed to obtain at least three letters of reference for four (4) of the four (4) personnel records reviewed. (Employees #1, #2, #3 and #4)</p> <p>The finding includes:</p> <p>A review of personnel records on April 10, 2014, beginning at approximately 3:25 p.m. revealed that the records belonging to Employees #1, #2, #3 and #4 did not have available for review three letters of reference.</p> <p>On April 10, 2014, beginning at 4:09 p.m. the designated ED reviewed the four employee records and confirmed there was no evidence that three letters of reference had been obtained for each employee.</p> <p>[Note: On April 14, 2014, at 3:15 p.m., the CPA's CEO and their ED came to the HRLA office to meet with the survey team and their supervisor. The ED presented reference check forms for Employees #2, #3 and #4. Employee #4's references were dated April 14, 2014.]</p>	S 095	<p>Personnel: Umbrella failed to demonstrate that 3 complete and verified references on all of its employees during the monitoring visit on April 10, 2014. On April 14, 2014 completed references for several employees were submitted to DOH. By May 1, 2014, all employees will have documented and verified references (3) in their employee file. Umbrella Human Resources will be responsible for this task. In the future, all employees will be required to have 3 signed and verified references before they are allowed to commence with employment.</p>	May 1, 2014	