

Health Regulation & Licensing Administration

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: HCA-0070	(X2) MULTIPLE CONSTRUCTION A. BUILDING: _____ B. WING: _____	(X3) DATE SURVEY COMPLETED 09/16/2016
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NAME OF PROVIDER OR SUPPLIER CAPITAL CITY NURSES HEALTH CARE SERVII	STREET ADDRESS, CITY, STATE, ZIP CODE 4900 MASS AVENUE #330 WASHINGTON, DC 20016
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H 000	<p>INITIAL COMMENTS</p> <p>An annual survey was conducted from September 14, 2016, through September 16, 2016, to determine compliance with Title 22B DCMR, Chapter 39 (Home Care Agencies Regulations). The Home Care Agency provides home care services to eighty-five (85) patients and employs fifty (50) staff. The findings of the survey were based on a review of administrative records, seven (7) active patient records, two (2) discharged patient records, nine (9) employee records, twenty-two (22) complaints, five (5) home visits, ten (10) patient telephone interviews and interviews with patients/family and staff.</p> <p>The following are abbreviations used within the body of this report:</p> <p>HCA - Home Care Agency HHA - Home Health Aide PCA - Personal Care Aide POC - Plan of Care SN - Skilled Nurse SOC - Start of Care</p>	H 000	<p><i>Received 10/3/16 CW</i></p>	
H 366	<p>3914.4 PATIENT PLAN OF CARE</p> <p>Each plan of care shall be approved and signed by a physician within thirty (30) days of the start of care; provided, however, that a plan of care for personal care aide services only may be approved and signed by an advanced practice registered nurse. If a plan of care is initiated or revised by a telephone order, the telephone order shall be immediately reduced to writing, and it shall be signed by the physician within thirty (30) days.</p> <p>This Statute is not met as evidenced by:</p>	H 366		

Health Regulation & Licensing Administration
LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE
Callie S. Huh RN TITLE
Director of Nursing (X6) DATE
9/30/16

STATE FORM 6899 VPNA11 If continuation sheet 1 of 3

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H 366	<p>Continued From page 1</p> <p>Based on record review and interview, the HCA failed to ensure that each POC was approved and signed by a physician within thirty (30) days of the SOC, for four (4) of seven (7) active patients in the sample (Patients #1, #2, #7 and #9)</p> <p>The findings include:</p> <ol style="list-style-type: none"> 1. On September 14, 2016, at 11:40 a.m., review of Patient #1's POC revealed a start of care date of November 2, 2015, for HHA service "ten (10) hours a week split on Tuesdays and Fridays." Further review of the POC revealed that it was not approved and signed by a physician or advanced practice registered nurse within thirty (30) days of the SOC. 2. On September 14, 2016, at 1:45 p.m., review of Patient #2's POC revealed a start of care date of May 9, 2016, for HHA service "21 hours Monday thru Sunday." Further review of the POC revealed that it was not approved and signed by a physician or advanced practice registered nurse within thirty (30) days of the SOC. 3. On September 14, 2016, at 1:59 p.m., review of Patient #7's POC revealed a start of care date of November 20, 2015, for HHA service "50 - 80 hours weekly [and] prn." Further review of the POC revealed that it was not approved and signed by a physician or advanced practice registered nurse within thirty (30) days of the SOC. 4. On September 14, 2016, at 2:24 p.m., review of Patient #9's POC revealed a start of care date of May 26, 2016, for HHA service "7 - 9 am Monday - Friday " Further review of the POC revealed that it was not approved and signed by a 	H 366		
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H 366	<p>Continued From page 2</p> <p>physician or advanced practice registered nurse within thirty (30) days of the SOC.</p> <p>On September 15, 2016, at 3:30 p.m., interview with the DON revealed that the plans of care were faxed to the physicians for signatures but were never returned to the agency. Additionally, the DON provided copies of faxed receipts as evidence that the POCs' were sent to the physicians for signatures and further stated that the HCA will continue to its efforts for physician 's signatures on the POCs.</p>	H 366	<p>H366: On 9/30/16 the DON spoke with the primary care physician at the DC Veterans Administration for patients #1, #2, and #9. He explained that the delay in him being able to provide signed POCs was because he does not have a Medicaid provider number. Only one physician in his office has this provider number. He directed that CCN should fax all POCs and orders for signature to the attention of this physician. The HCA has updated the files of his patients with this information.</p> <p>Effective immediately, the HCA will conduct monthly client file audits for signed POC compliance. The HCA will continue to have the primary RN manager fax all new and updated POCs for signature, write an activity note in client record and tag as 'Physician Orders: Requested'. Upon receipt of signed orders, an activity note titled 'Physician Orders: Obtained' will be added to client record and a copy of the signed orders will be uploaded to the client's electronic file. The DON, or her delegate, will perform a monthly audit for POC signature compliance through comparing and reconciling reports for these two activity tags. For any unsigned POC identified, the HCA will contact the provider's office via phone until signature is obtained. Activity notes will be made to document all attempts and activity to obtain physician signature.</p>	
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September 30, 2016



Laura Hunte
Supervisory Health Services Program Specialist
Health Regulation and Licensing Administration
Intermediate Care Facilities Division
District of Columbia Department of Health
899 North Capitol Street N.E.
2nd Floor
Washington, D.C. 20002

Re: 4900 Massachusetts Ave, N.W. (HCA-0070)

Dear Ms. Hunte,

Please find enclosed the Plan of Correction for the deficiency cited during the survey of our agency by your staff on September 14, 2016.

It is noteworthy that for 3 out of the 4 patient records that were cited for an unsigned Plan of Care, the physician is the same provider at the Veterans Affairs Medical Center. In my follow-up conversation with this physician, he shared with me that only one physician in this VA practice has a Medicaid provider number, which was the reason why POCs submitted to him were backlogged. While Capital City Nurses Healthcare Services does not provide HHA services under the DC Medicaid Waiver program, the only POC form that was approved by your team for our use very closely resembles the Medicaid POC. These two factors have complicated our ability to obtain physician signatures on POCs that are for ADL and IADL care. These factors were also raised for further consideration during the Taskforce's re-evaluation of DC Home Care Agency regulations.

Capital City Nurses has followed the Plan of Correction established last year subsequent to our survey by your team, implementing the approved operational changes to support compliance with signed POCs. Brian Rodgers and myself later met with you and your Nurse Specialists in December 2015 and followed your guidance to record fax transmittals and attempts to obtain POC signatures for the clients we serve. We produced this documentation of our efforts during the recent survey. While we will continue to collaborate with providers to get 100% signature compliance, we would like to appeal the citation for H366 given our adherence to your guidance and the approved Plan of Correction.

I welcome a follow-up conversation or meeting at your convenience.

Sincerely,



Caitlin Houck, RN, MS

Director of Nursing

Capital City Nurses Healthcare Services



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