

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

PRINTED: 05/18/2018  
FORM APPROVED  
OMB NO. 0938-0391

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| STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION | (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:<br><br><b>34G092</b> | (X2) MULTIPLE CONSTRUCTION<br>A. BUILDING _____<br><br>B. WING _____ | (X3) DATE SURVEY COMPLETED<br><br><b>05/15/2018</b> |
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| NAME OF PROVIDER OR SUPPLIER<br><br><b>BLUE RIDGE HOMES-MADISON</b> | STREET ADDRESS, CITY, STATE, ZIP CODE<br><b>BLUE RIDGE HOMES DRIVE #50<br/>MARS HILL, NC 28754</b> |
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| E 007 | <p>EP Program Patient Population<br/>CFR(s): 483.475(a)(3)</p> <p>[(a) Emergency Plan. The [facility] must develop and maintain an emergency preparedness plan that must be reviewed, and updated at least annually. The plan must do the following:]</p> <p>(3) Address patient/client population, including, but not limited to, persons at-risk; the type of services the [facility] has the ability to provide in an emergency; and continuity of operations, including delegations of authority and succession plans.**</p> <p>*Note: ["Persons at risk" does not apply to: ASC, hospice, PACE, HHA, CORF, CMCH, RHC, FQHC, or ESRD facilities.]<br/>This STANDARD is not met as evidenced by:<br/>The facility failed to ensure the communication system used in the emergency plan (EP) included sufficient specific information in the needs of the individual clients as evidenced by interview and review of the facility's information sheet. The finding is:</p> <p>Review of the EP, verified by interviews with the manager of Snowbird Cottage and the clinical director, revealed emergency information regarding the residents of the group home was limited to the general information contained on an information face sheet. Continued review of the information sheet revealed a basic description of each client's communication skills and dietary needs were included on the face sheet. However, further review of the information did not reveal other specific client information such as behavioral issues, evacuation needs or describe how anyone unfamiliar with the clients should work with them in an emergency situation.</p> | E 007 | see attached | 7/5/18 |
|-------|--|-------|--------------|--------|



LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE: *Derek Briscoe* TITLE: Director of Clinical Services (X6) DATE: 5-25-18

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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| E 037   | <p>EP Training Program<br/>CFR(s): 483.475(d)(1)</p> <p>(1) Training program. The [facility, except CAHs, ASCs, PACE organizations, PRTFs, Hospices, and dialysis facilities] must do all of the following:</p> <p>(i) Initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing services under arrangement, and volunteers, consistent with their expected role.</p> <p>(ii) Provide emergency preparedness training at least annually.</p> <p>(iii) Maintain documentation of the training.</p> <p>(iv) Demonstrate staff knowledge of emergency procedures.</p> <p>*[For Hospitals at §482.15(d) and RHCs/FQHCs at §491.12:] (1) Training program. The [Hospital or RHC/FQHC] must do all of the following:</p> <p>(i) Initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing on-site services under arrangement, and volunteers, consistent with their expected roles.</p> <p>(ii) Provide emergency preparedness training at least annually.</p> <p>(iii) Maintain documentation of the training.</p> <p>(iv) Demonstrate staff knowledge of emergency procedures.</p> <p>*[For Hospices at §418.113(d):] (1) Training. The hospice must do all of the following:</p> <p>(i) Initial training in emergency preparedness policies and procedures to all new and existing hospice employees, and individuals providing services under arrangement, consistent with their expected roles.</p> <p>(ii) Demonstrate staff knowledge of emergency procedures.</p> | E 037   | <i>see attached</i>   | <i>7/15/18</i>       |   |

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| E 037   | <p>Continued From page 2</p> <p>(iii) Provide emergency preparedness training at least annually.</p> <p>(iv) Periodically review and rehearse its emergency preparedness plan with hospice employees (including nonemployee staff), with special emphasis placed on carrying out the procedures necessary to protect patients and others.</p> <p>*[For PRTFs at §441.184(d):] (1) Training program. The PRTF must do all of the following:</p> <p>(i) Initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing services under arrangement, and volunteers, consistent with their expected roles.</p> <p>(ii) After initial training, provide emergency preparedness training at least annually.</p> <p>(iii) Demonstrate staff knowledge of emergency procedures.</p> <p>(iv) Maintain documentation of all emergency preparedness training.</p> <p>*[For PACE at §460.84(d):] (1) The PACE organization must do all of the following:</p> <p>(i) Initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing on-site services under arrangement, contractors, participants, and volunteers, consistent with their expected roles.</p> <p>(ii) Provide emergency preparedness training at least annually.</p> <p>(iii) Demonstrate staff knowledge of emergency procedures, including informing participants of what to do, where to go, and whom to contact in case of an emergency.</p> <p>(iv) Maintain documentation of all training.</p> | E 037   |   |                      |   |



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| E 037   | <p>Continued From page 3</p> <p>*[For CORFs at §485.68(d):](1) Training. The CORF must do all of the following:</p> <p>(i) Provide initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing services under arrangement, and volunteers, consistent with their expected roles.</p> <p>(ii) Provide emergency preparedness training at least annually.</p> <p>(iii) Maintain documentation of the training.</p> <p>(iv) Demonstrate staff knowledge of emergency procedures. All new personnel must be oriented and assigned specific responsibilities regarding the CORF's emergency plan within 2 weeks of their first workday. The training program must include instruction in the location and use of alarm systems and signals and firefighting equipment.</p> <p>*[For CAHs at §485.625(d):] (1) Training program. The CAH must do all of the following:</p> <p>(i) Initial training in emergency preparedness policies and procedures, including prompt reporting and extinguishing of fires, protection, and where necessary, evacuation of patients, personnel, and guests, fire prevention, and cooperation with firefighting and disaster authorities, to all new and existing staff, individuals providing services under arrangement, and volunteers, consistent with their expected roles.</p> <p>(ii) Provide emergency preparedness training at least annually.</p> <p>(iii) Maintain documentation of the training.</p> <p>(iv) Demonstrate staff knowledge of emergency procedures.</p> <p>*[For CMHCs at §485.920(d):] (1) Training. The</p> | E 037   |   |                      |   |





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| E 037   | <p>Continued From page 4</p> <p>CMHC must provide initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing services under arrangement, and volunteers, consistent with their expected roles, and maintain documentation of the training. The CMHC must demonstrate staff knowledge of emergency procedures. Thereafter, the CMHC must provide emergency preparedness training at least annually.</p> <p>This STANDARD is not met as evidenced by:<br/>Based on interview and record review the facility failed to show evidence direct care staff were sufficiently trained in the use of the facility's emergency plan (EP). The finding is:</p> <p>Interview with direct care staff in the four cottages regarding the facility's EP revealed an awareness of what to do during fire drills. However, continued interviews revealed no specific knowledge of what should be done during other types of emergency situations. Additional interview with direct care staff revealed no formal training has been provided regarding the facility's EP.</p> <p>Interviews with the manager of Snowbird cottage, qualified intellectual disabilities professional (QIDP) and the clinical director verified no specific face to face training had been done with staff regarding the facility's EP. However, continued interview with the manager, QIDP and the clinical director, verified by review of a copy of the list of staff whom the information was sent to, revealed information had been distributed to all staff through the facility's electronic communication system. Further interviews with the manager, QIDP and clinical director revealed</p> | E 037   |   |                      |   |



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| E 037   | Continued From page 5<br>there is no method to ensure staff had actually read or understood the information regarding the EP.  | E 037   |   |                      |   |
| W 129   | PROTECTION OF CLIENTS RIGHTS<br>CFR(s): 483.420(a)(7)<br><br>The facility must ensure the rights of all clients. Therefore, the facility must provide each client with the opportunity for personal privacy.<br><br>This STANDARD is not met as evidenced by:<br>The facility failed to assure the right to privacy for clients in Roan and Spring Creek as evidenced by observation, interview and record verification. The findings are:<br><br>A. In Roan, the facility failed to provide clients with the opportunity for personal privacy during morning observations on 5/15/18. Observations in Roan at 7:20 AM revealed staff and client #11 entering the laundry room and taking folded clothes to each client's room to put them away. Staff and client #11 were observed to enter rooms to complete their task without regard for who was already in the room, what was occurring in the room, or including the assistance of client's in their bedrooms. For example, at 7:30 AM staff and client #11 were observed to open the door and enter the bedroom shared by client #13 and client #15 to put clothes away. Client #13 was observed laying on his bed while the facility nurse was observed evaluating client #15's leg on his | W 129   | <i>see attached</i>   | <i>7/15/18</i>       |   |

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| W 129   | <p>Continued From page 6</p> <p>bed. After placing the clothes in the drawers, staff and client #11 were observed exiting the room and leaving the door open to the hallway.</p> <p>Interview with staff revealed this is one of the daily chores client #11 helps with and it is the normal routine to put clothes away that were washed and folded by staff on 3rd shift. Interview with the qualified intellectual disabilities professional (QIDP) revealed client privacy should be respected and there may be better ways to assist clients with laundry chores. In addition, review of client #11's individual support plan (ISP) dated 8/9/17 revealed a behavior support plan (BSP) to address several disruptive behaviors including "invading others privacy" identified as entering other client's bedrooms without permission or reason. The facility not only failed to assure privacy for clients in Roan on 5/15/18 but were not modeling appropriate behaviors for client #11 to assist with his BSP.</p> <p>B. In Spring Creek, the facility failed to provide clients with the opportunity for personal privacy relative to documentation. Observation in Spring Creek throughout the 5/14-15/18 survey revealed a sign off sheet on the staff office door visible to all hallway passerby's. Observation of the sign off sheet revealed the names of all client's in the home with staff signature indicting "BM/Hygiene book completed."</p> <p>Interview with the QIDP revealed the sign off sheet is currently used for staff to sign off regarding hygiene completion of each client while other tracking is completed through an electronic system. Additional interview with the QIDP verified the personal information of clients should not be visible to home visitors.</p> | W 129   |   |                      |   |



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| W 249   | <p><b>PROGRAM IMPLEMENTATION</b><br/>CFR(s): 483.440(d)(1)</p> <p>As soon as the interdisciplinary team has formulated a client's individual program plan, each client must receive a continuous active treatment program consisting of needed interventions and services in sufficient number and frequency to support the achievement of the objectives identified in the individual program plan.</p> <p>This STANDARD is not met as evidenced by:<br/>Based on observation, record review and staff interview, the team failed to assure the behavior support plan (BSP) was implemented as prescribed for 1 of 3 sampled clients (#26) in Spring Creek. The finding is:</p> <p>Observation in the group home on 5/14/18 at 5:20 PM revealed client #26 sitting outside on the porch, listening to music with no staff supervision. Continued observation revealed client #26 to get up from her chair, walk across the porch and grab an open can of regular Mountain Dew soda and drink it. The client then threw the can on the ground and grabbed a hula hoop until the home manager walked by and the client came into the group home.</p> <p>Review of records for client #26 on 5/14/18 revealed a behavior support plan (BSP) dated 8/16/17 for target behaviors of stealing, crying, tantrum, invading others privacy and physical aggression. Continued review of the BSP revealed prevention strategies to include: During less structured times, staff should attempt to get the client actively involved with activities.</p> | W 249   | <i>See attached</i>   | <i>7/15/18</i>       |   |

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| W 249   | Continued From page 8<br>Suggestions include playing with preferred items, going for a walk or exploring new leisure items and activities. This will decrease the likelihood of the client becoming bored and engaging in attention seeking/disruptive behavior.<br><br>Interview with the home manager on 5/14/18 revealed client #26 should not have access to regular soda. Interview with the qualified intellectual disabilities professional (QIDP) on 5/15/18 verified client #26 should be offered activities as referenced in the BSP that involve her hands to keep the client from getting bored. Further interview with the QIDP verified by leaving the client unattended, not engaged in any physical activity and allowing the client access to an open can of regular soda that belonged to staff that the client's BSP was not followed. | W 249   |   |                      |   |
| W 263   | PROGRAM MONITORING & CHANGE CFR(s): 483.440(f)(3)(ii)<br><br>The committee should insure that these programs are conducted only with the written informed consent of the client, parents (if the client is a minor) or legal guardian.<br><br>This STANDARD is not met as evidenced by:<br>Based on observations, record review and interview, the specifically constituted committee, designated as the Human Rights Committee (HRC), failed to ensure written, informed consents were obtained for the use of door alarms in the home for 2 of 2 sampled client's (#2 and #5) in Big Laurel. The finding is:<br><br>Observations conducted in the home throughout the 5/14-5/15/18 survey revealed a loud alarm   | W 263   | <i>see attached</i>   | <i>7/15/18</i>       |   |

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| W 263   | Continued From page 9<br>sounded each time the front door or two side exterior doors were opened. Interview with group home staff on 5/14/18 revealed the exterior door alarms were in place because clients #3 and #8 had engaged in AWOL behavior in the past. A review of the records on 5/15/18 for clients #2 and #5 revealed no current consents were available related to the use of the door alarms.<br><br>Interview with the facility clinical director (CD) on 5/15/18 confirmed no current guardian consents related to exterior door alarms had been obtained for client's #2 and #5. The CD indicated multiple clients in the home did not have current consents for the door alarms because of an oversight when obtaining annual consents.                                       | W 263   |   |                      |   |
| W 312   | DRUG USAGE<br>CFR(s): 483.450(e)(2)<br><br>Drugs used for control of inappropriate behavior must be used only as an integral part of the client's individual program plan that is directed specifically towards the reduction of and eventual elimination of the behaviors for which the drugs are employed.<br><br>This STANDARD is not met as evidenced by:<br>The team failed to ensure medications to control inappropriate behaviors were used only as an integral part of the individual support plan (ISP) for 1 of 2 sampled client (#19) residing in Snowbird as evidenced by interview and review of records. The finding is:<br><br>Review of the records for client #19 revealed physician's orders dated 4/25/18 revealed client #19's medication regime to include Abilify 10 mg., | W 312   | <i>See attached</i>   | <i>7/15/18</i>       |   |

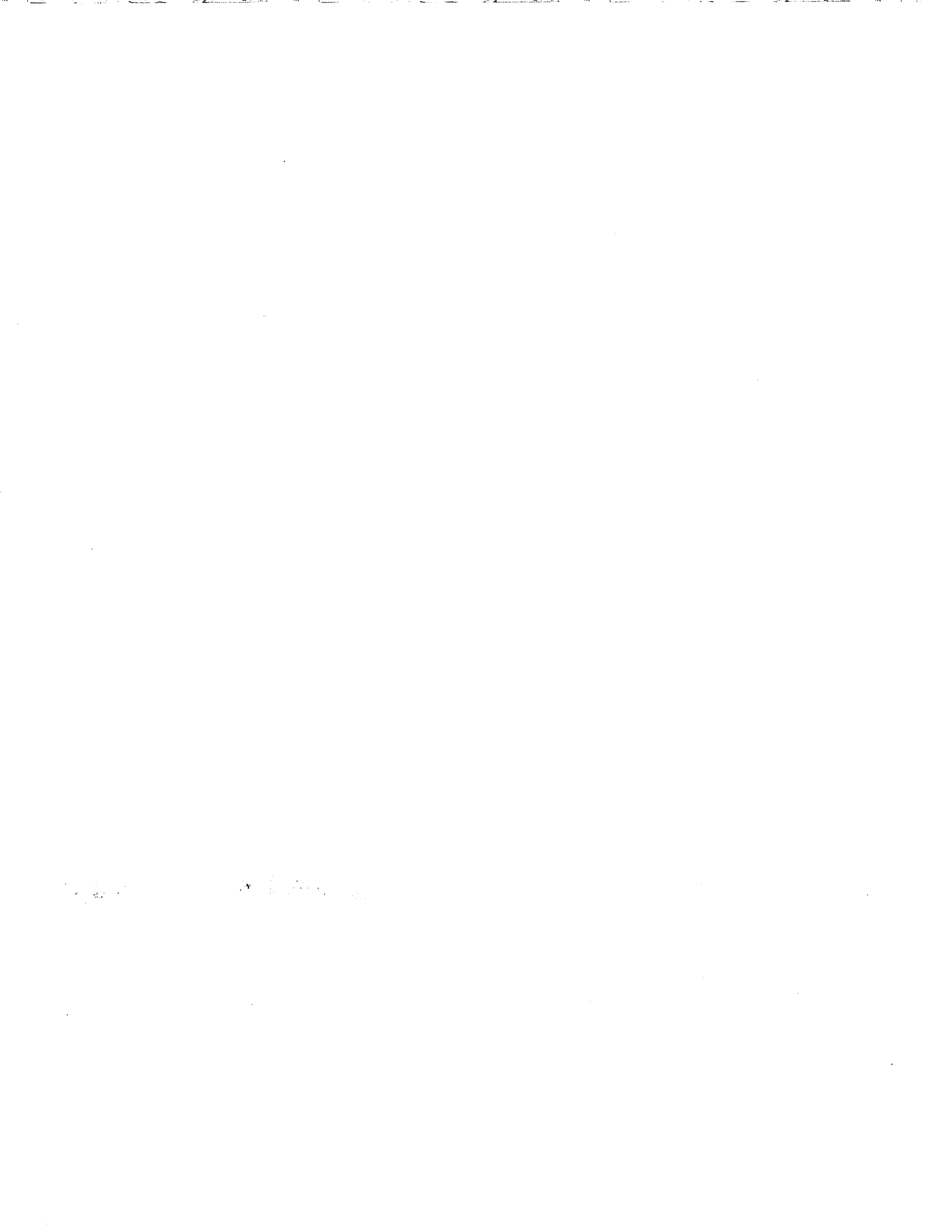
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| STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION                    |  | (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:<br><br><b>34G092</b> | (X2) MULTIPLE CONSTRUCTION<br>A. BUILDING _____<br><br>B. WING _____  |                      | (X3) DATE SURVEY COMPLETED<br><br><b>05/15/2018</b> |
|---|--|---|---|----------------------|---|
| NAME OF PROVIDER OR SUPPLIER<br><br><b>BLUE RIDGE HOMES-MADISON</b> |  |   | STREET ADDRESS, CITY, STATE, ZIP CODE<br><b>BLUE RIDGE HOMES DRIVE #50<br/>MARS HILL, NC 28754</b>              |                      |   |
| (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) COMPLETION DATE |   |
| W 312   | Continued From page 10<br>Zyprexa 15mg. BID and Risperdal 4 mg. TID. Further review of the records revealed quarterly drug reviews dated 3/2/18 stating the client received Risperdal, Abilify and Zyprexa to assist in controlling inappropriate behaviors.<br><br>Continued review of the records for client #19 revealed a behavior support plan (BSP) dated 4/7/17 to demonstrate zero episodes of disruptive behaviors per month for 6 consecutive months implemented on 4/7/17. Continued review of the BSP revealed disruptive behaviors to be defined as verbal aggression, property destruction, tantrums, food stealing AWOL, PICA and self-injurious behaviors. Further review of the BSP revealed the client is to receive Risperdal, Zyprexa and Celexa. Additional review of the BSP failed to include the use of Abilify in the use of reducing disruptive behaviors.<br><br>Interview with the behaviorist revealed the client is receiving Ability and the 4/7/17 BSP was the most recent plan in client #19's records. Continued interview with the behaviorist verified Abilify was not included in the BSP.<br><br>As the use of Abilify is not identified in the BSP, the team has no measurable means of determining the effectiveness of the use of the medication in reducing the behavior for which it is given. Therefore, the use of Ability is not an integral part of the ISP for client #19. | W 312   |   |                      |   |
| W 436   | SPACE AND EQUIPMENT<br>CFR(s): 483.470(g)(2)<br><br>The facility must furnish, maintain in good repair, and teach clients to use and to make informed choices about the use of dentures, eyeglasses,   | W 436   | <i>see attached</i>   | <i>7/15/18</i>       |   |



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

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| W 436   | <p>Continued From page 11</p> <p>hearing and other communications aids, braces, and other devices identified by the interdisciplinary team as needed by the client.</p> <p>This STANDARD is not met as evidenced by:<br/>Based on observation, record review and interview, the facility failed to ensure 1 of 3 sampled clients (#27) in Spring Creek was taught to use and make informed choices about the use of their eyeglasses. The finding is:</p> <p>Observations on 5/14/18 of client #27 revealed the client to wear glasses throughout observation times. Observation in the group home on 5/15/18 at 6:55 AM revealed client #27 to exit her bedroom without wearing glasses. The client was observed to walk down the hallway to the kitchen area and to wash her hands for her breakfast meal with verbal prompts by staff. Continued observation revealed the client to sit at the kitchen table, participate in the breakfast meal, walk back to her bedroom and continue her morning routine in her room with staff assistance at various times. Client #27 was observed to ask staff at three various times for her glasses and was told "you will get them in a minute when you get your medications." Observation at 8:02 AM revealed client #27 to exit the med room wearing her eye glasses.</p> <p>Review of records for client #27 revealed a vision exam dated 9/1/17 indicating the client to have a diagnosis of high myopia, astigmatism, presbyopia and 2 cataracts with new bifocal myodisc glasses. Continued review of client #27's record revealed an individual support plan (ISP) dated 3/29/17 with objectives relative to</p> | W 436   |   |                      |   |





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| W 436   | Continued From page 12<br>handwashing, laundry, personal hygiene, activity participation, verbal choice making, toileting, rate of eating, toothbrushing and exercise. Additional review of current objectives and programs for client #27 revealed no training to address proper use and care of eyeglasses.<br><br>Interview with staff on 5/15/18 revealed client #27 gets her glasses during her morning medication pass. Additional staff interview verified client #27 has a history of improperly caring for her eye glasses and therefore her glasses are kept locked in the medication room at night after the evening medication pass and kept locked until she gets them with her morning medications. Staff further indicated the client is nearly blind without her glasses. Interview with the qualified intellectual disabilities professional (QIDP) on 5/15/18 verified client #27 has limited vision without her glasses and due to improper care, the client's glasses are stored in the medication room at night. Further interview with the QIDP verified the client has no current training objective to address proper use and care of her eyeglasses. | W 436   |   |                      |   |
| W 440   | EVACUATION DRILLS<br>CFR(s): 483.470(i)(1)<br><br>The facility must hold evacuation drills at least quarterly for each shift of personnel.<br><br>This STANDARD is not met as evidenced by:<br>The facility failed to assure fire drills were conducted at least quarterly for each shift as evidenced by interview and record verification.<br>The finding is:<br><br>Review of facility fire drill reports for the past year  | W 440   | <i>see attached</i>   | <i>7/15/18</i>       |   |



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| W 440   | <p>Continued From page 13</p> <p>starting in 5/17 through 4/18 for each of the four homes (Big Laurel, Roan, Snowbird and Spring Creek) revealed several errors in ensuring fire drills for each shift were conducted quarterly for each shift of personnel. For example:</p> <p>A. Review of the first quarter 5/17 through 7/17 revealed the facility did not conduct any 2nd shift fire drills resulting in only three 2nd shift fire drills being conducted over the past year.</p> <p>B. Review of the third quarter 11/17 through 1/18 revealed no fire drills were conducted during the month on 1/18. Interview with administrative staff revealed staff attempted to make up the missed drills in 2/17 and corrective action was given to staff who failed to conduct the drills. Review of the make up drills in 2/17 and the scheduled drills in 2/17 revealed no drills were conducted in Big Laurel for 1st or 2nd shift.</p> <p>C. Review of the fourth quarter 2/18 through 4/18 revealed 3rd shift drills were missed in Big Laurel and Snow Bird during 3/18 as required.</p> | W 440   |   |                      |   |



Derek Briscoe

Director of Clinical Services

Blue Ridge Area Foundation

31 College Place Suite 306

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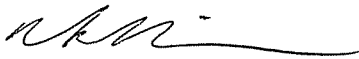
May 25, 2018

To the DHHS survey team:

On behalf of all the clients and the entire support team at Blue Ridge Homes – Madison, thank you for the time and energy you spent with us last week helping us to improve our services. Following, you will find our plan to correct the issues cited during the survey. We look forward to the improved outcomes you have helped us to identify.

Thank you again.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Briscoe', with a long horizontal flourish extending to the right.

Derek Briscoe, Director of Clinical Services

Blue Ridge Group Homes – Madison

Plan of Correction

5/15/2018

#### **E 007 EMERGENCY PLAN – PROGRAM PATIENT POPULATION**

*The facility must develop and maintain an emergency preparedness plan that must be reviewed and updated at least annually.*

The Mars Hill QIDP will develop addendums to each of the four group homes' emergency preparedness plans, which will include specific client information that would be relevant to a person unfamiliar with the clients in an emergency situation. The addendums will consist of client specific issues which relate to safety, such as transfer/mobility guidelines, intake and elimination guidelines, behavior guidelines, evacuation guidelines, and will also consist of the clients' preferred activities for independent leisure.

These addendums will be updated as needed and at least quarterly by the QIDP. Review, and any follow-up thereby identified, will be conducted by the Director of Clinical Services as needed and at least annually, in order to ensure continued compliance with the expectation that the facility must develop and maintain an emergency preparedness plan.

**Responsible Persons:** QIDP, Director of Clinical Services

**Mechanism to ensure compliance:** Review by Director of Clinical Services

**Frequency of Mechanism:** At least annually

#### **E 037 EMERGENCY PLAN – TRAINING PROGRAM**

*The facility must do all the following: 1. Initial training in emergency preparedness policies and procedures to all new and existing staff, individuals providing services under arrangement, and volunteers, consistent with their expected role; 2. Provide emergency preparedness training at least annually; 3. Maintain documentation of the training; 4. Demonstrate staff knowledge of emergency procedures.*

The Mars Hill QIDP will conduct face to face training of the emergency preparedness plan with the existing staff working in Mars Hill. The Director of Facilities Maintenance will develop a face to face training for new hires, to be completed in their initial training period, as well as an annual emergency preparedness training, to be conducted annually.

Training documentation will be kept with the HR department, and regular review of training documentation and any follow-up thereby identified will be conducted by the HR department,

in order to ensure continued compliance with the expectation that the facility must comply with emergency preparedness regulations.

**Responsible Persons:** QIDP, Director of Clinical Services, Director of Facilities Maintenance, Director of Human Resources

**Mechanism to ensure compliance:** Review of staff training records

**Frequency of Mechanism:** At least annually

## **W 129 PROTECTION OF CLIENT RIGHTS**

*The facility must ensure the rights of all clients. Therefore, the facility must provide each client with the opportunity for personal privacy.*

The Mars Hill QIDP Assistant will conduct training with Mars Hill staff regarding protecting clients' rights to personal privacy. The training will consist of theoretical rationale for supporting clients to exercise this right, as well as practical examples of opportunities to provide this support which are likely to occur in a group home setting, such as when entering bedrooms.

The Director of Clinical Services will conduct training with members of the clinical team regarding protecting clients' rights to personal privacy. The training will consist of theoretical rationale for supporting clients to exercise this right, as well as practical examples of opportunities to provide this support which are likely to occur in a group home setting, such as when pertinent clinical information requires dissemination or collection. Such information will be conveyed or collected discretely.

Regular clinical and environmental assessment, and any follow-up thereby identified, will be conducted by the clinical and management teams, in order to ensure continued compliance with the expectation that each client is provided with the opportunity for personal privacy.

**Responsible Persons:** QIDP Assistant, Director of Clinical Services

**Mechanism to insure compliance:** Interaction and Environmental Assessments

**Frequency of Mechanism:** At least monthly in each group home

## **W 249 PROGRAM IMPLEMENTATION**

*As soon as the interdisciplinary team has formulated a client's individual program plan, each client must receive a continuous active treatment program consisting of needed interventions and services in sufficient number and frequency to support the achievement of the objectives identified in the individual program plan.*

The Behavior Specialist will conduct training with staff working in Spring Creek group home regarding implementation of preventative and interventive strategies prescribed in client #26's behavior support plan.

Since clients residing in other group homes in Mars Hill require similar support regarding prevention of food seeking behavior, the QIDP will conduct training with all staff working in Mars Hill regarding limiting client access of desirable food items belonging to staff members.

Regular clinical assessment, and any follow-up thereby identified, will be conducted by the clinical and management teams, in order to ensure continued compliance with the expectation that each client receive a continuous active treatment program.

**Responsible Persons:** Behavior Specialist, QIDP

**Mechanism to insure compliance:** Interaction Assessments

**Frequency of Mechanism:** At least monthly in each group home

#### **W 263 PROGRAM MONITORING AND CHANGE**

*The committee should insure that these programs are conducted only with the written informed consent of the client, parents (if the client is a minor), or legal guardian.*

The QIDP will audit the current consents of all clients residing in Mars Hill, and ensure that consent is obtained for the use of door alarms for any client residing in Big Laurel, Roan, or Snowbird, where door alarms are currently in use. The Blue Ridge Area Foundation Human Rights Committee will review these consents when they are obtained.

Regular chart reviews, and any follow-up thereby identified, will be conducted by the Director of Clinical Services, in order to ensure continued compliance with the expectation that the committee should insure that these programs are conducted only with the written informed consent of the client, parents (if the client is a minor), or legal guardian.

**Responsible Persons:** QIDP

**Mechanism to insure compliance:** Review of clinical records

**Frequency of Mechanism:** At least annually

#### **W 312 DRUG USAGE**

*Drugs used for control of inappropriate behavior must be used only as an integral part of the client's individual program plan that is directed specifically towards the reduction of and eventual elimination of the behaviors for which the drugs are employed.*



The psychologist will revise the current behavior support plan for client #19 which inaccurately lists the medications employed as an integral part of his individual program plan.

Regular chart reviews, and any follow-up thereby identified, will be conducted by the Director of Clinical Services, in order to ensure continued compliance with the expectation that drugs used for control of inappropriate behavior must be used only as an integral part of the client's individual program plan that is directed specifically towards the reduction of and eventual elimination of the behaviors for which the drugs are employed.

**Responsible Persons:** Psychologist, Behavior Specialist

**Mechanism to insure compliance:** Review of clinical records

**Frequency of Mechanism:** At least annually

#### **W 436 SPACE AND EQUIPMENT**

*The facility must furnish, maintain in good repair, and teach clients to use and to make informed choices about the use of dentures, eyeglasses, hearing and other communication aids, braces, and other devices identified by the interdisciplinary team as needed by the client.*

The interdisciplinary team met to discuss client #27's need for support surrounding the use and care of her glasses, and determined that restricting her access to them is not a needed support. Rather, the IDT determined that client #27 is in need of formal training to care for and store her glasses in her bedroom at night. The QIDP Assistant will develop and implement this training.

Regular clinical assessment and chart reviews, and any follow-up thereby identified, will be conducted by the clinical and management teams, in order to ensure continued compliance with the expectation that the facility must furnish, maintain in good repair, and teach clients to use and to make informed choices about the use of dentures, eyeglasses, hearing and other communication aids, braces, and other devices identified by the interdisciplinary team as needed by the client.

**Responsible Persons:** QIDP Assistant

**Mechanism to insure compliance:** Assessment, and review of clinical records

**Frequency of Mechanism:** At least monthly in each group home, at least annually for chart review

#### **W 440 EVACUATION DRILLS**

*The facility must hold evacuation drills at least quarterly for each shift of personnel.*

Staff responsible for conducting fire drills will be trained regarding the expectation that fire drills are conducted quarterly for each shift.

Regular fire drill documentation reviews and any follow-up thereby identified will be conducted by the Director of Residential Services, in order to ensure continued compliance with the expectation that fire drills are conducted at least quarterly for each shift of personnel.

**Responsible Persons:** Director of Residential Services

**Mechanism to insure compliance:** Review of fire drill documentation

**Frequency of Mechanism:** At least monthly