

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  <b>MHL088-020</b>	(X2) MULTIPLE CONSTRUCTION A. BUILDING: _____ B. WING: _____	(X3) DATE SURVEY COMPLETED  <b>R 06/19/2019</b>
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NAME OF PROVIDER OR SUPPLIER  <b>TRAILS CAROLINA</b>	STREET ADDRESS, CITY, STATE, ZIP CODE <b>500 WINDING GAP ROAD LAKE TOXAWAY, NC 28747</b>
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V 000 INITIAL COMMENTS

A limited follow up survey was completed on 6/19/19. Deficiencies were cited.

This facility is licensed for the following service category:  
10A NCAC 27G .5200 RESIDENTIAL THERAPEUTIC (HABILITATIVE) CAMPS FOR CHILDREN AND ADOLESCENTS OF ALL DISABILITY GROUPS.

V 000

**RECEIVED**  
**JUL 29 2019**  
**DHSR-MH Licensure Sect**

V 118 27G .0209 (C) Medication Requirements

10A NCAC 27G .0209 MEDICATION REQUIREMENTS

(c) Medication administration:

(1) Prescription or non-prescription drugs shall only be administered to a client on the written order of a person authorized by law to prescribe drugs.

(2) Medications shall be self-administered by clients only when authorized in writing by the client's physician.

(3) Medications, including injections, shall be administered only by licensed persons, or by unlicensed persons trained by a registered nurse, pharmacist or other legally qualified person and privileged to prepare and administer medications.

(4) A Medication Administration Record (MAR) of all drugs administered to each client must be kept current. Medications administered shall be recorded immediately after administration. The MAR is to include the following:

(A) client's name;

(B) name, strength, and quantity of the drug;

(C) instructions for administering the drug;

(D) date and time the drug is administered; and

(E) name or initials of person administering the drug.


(5) Client requests for medication changes or

V 118

Obtaining Orders for Students:

- Admissions counselors will clarify messaging with families during the admissions process, regarding the importance of Doctor's orders. Trails will inform families that without Doctor's orders it will hinder Trails ability to properly administer student's medication.
- For "Daily Incoming Admissions" email, a section has been added regarding status of orders for medications and designated admissions person. This will be updated each day leading up to the admission date. It is the responsibility of the designated admissions staff to communicate the importance of obtaining orders prior to admission.
- Upon confirmation of enrollment date Health and Wellness Department (HWD) will send an introduction email to a family reiterating the need for orders prior to or on the date of enrollment.
- Upon admission the admissions facilitator and/or HWD will review medications and corresponding orders and document the review on a tracking document.
- Once the MAR is created it will be cross referenced by the HWD.
- Receipt of order will be tracked in the students Best Notes file.
- Process will be overseen by Program Director with support from HR Director as needed.

Division of Health Service Regulation  
LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE

  
6899 VYBG11

TITLE *Program Director*

(X6) DATE  
**7/29/19**

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V 118	<p>Continued From page 1</p> <p>checks shall be recorded and kept with the MAR file followed up by appointment or consultation with a physician.</p> <p>This Rule is not met as evidenced by: Based on observation, record review and interviews, the facility failed to keep the MAR current and failed to follow the written order of a physician affecting 3 of 6 audited clients (Client #1, #2 and #3). The findings are:</p> <p>Cross reference: 10A NCAC 27G .5203 Operations (V278) Based on observation, record review and interviews the facility failed to implement procedures for the care and safety effecting 1 of 6 audited clients (Client #3).</p> <p>Record review on 6/18/19 for Client #1 revealed: -Admission date of 4/4/19 with diagnoses of Generalized Anxiety Disorder, Attention Deficit Hyperactivity Disorder (ADHD) and Major Depressive Disorder. Age-16 years</p> <p>Review on 6/18/19 of MARs for 5/9/19-6/18/19 revealed: --Amoxicillin (antibiotic) was initialed as administered twice daily from 5/10/19 pm dose to 5/17/19 am dose. (14 doses) There was no signed physician's order available.</p> <p>Record review on 6/18/19 for Client #2 revealed: -Admission date of 5/15/19 with diagnoses of Generalized Anxiety Disorder and ADHD. Age-14 years -Physician ordered medications on 5/16/19</p>	V 118		

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V 118	<p>Continued From page 2</p> <p>included: --Tazarotene (acne/skin rash) 0.1% cream apply to face once in the evening. "Patient should not apply medication if she will be exposed to the sun on a daily basis for long periods of time."</p> <p>Review on 6/18/19 of MARs for 5/16/19-6/18/19 revealed: --Tazarotene - there were no initials as being administered at all. (33 doses). -MAR instructions noted to "apply to spots on face twice weekly. Must wear sunscreen and sunhat. If items are available or student is unwilling, please do not apply cream." No other documentation was made on MARs.</p> <p>Record review on 6/18/19 for Client #3 revealed: -Admission date of 6/6/19 with diagnoses of unspecified Anxiety Disorder, ADHD, Cannabis Use Disorder, Major Depressive Disorder, Asthma and Hashimoto Thyroiditis. Age-16 years -Physician ordered medications on 6/10/19 included: --Minocycline (antibiotic) 75mg take twice daily. --Tretinoin (acne) 0.05% cream apply to chest scar daily. --Ketoconazole Cream (antifungal) 2% apply to skin twice daily for 2 weeks per flare. --Hydrocortisone Cream (steroid) 2.5% apply to chest rash twice daily.</p> <p>Review on 6/18/19 of MARs for 6/6/19-6/18/19 revealed: --Minocycline was administered 6/8/19-6/10/19 prior to date of order (5 doses). Instructions on MAR noted medication was to be given as 2 capsules every AM rather than 1 cap twice daily. --Tretinoin was administered 6/7/19-6/10/19 (4 doses).</p>	V 118		

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V 118	<p>Continued From page 3</p> <p>--Ketoconazole Cream was administered 6/7/19-6/10/19 (4 doses). --Hydrocortisone Cream was administered 6/6/19-6/10/19 (8 doses). Medication administered without physician's order included: --Duloxetine HCL (antidepressant) 60mg 1 tab in AM-administered 6/7/19-6/18/19 (12 doses). --Levothyroxine (hypothyroidism) 88mcg once daily- administered 6/6/19-6/17/19 (12 doses). --Camila (birth control) .035mg once daily-administered 6/7/19-6/18/19 (12 doses). --Albuterol Sulfate (bronchodilator) inhale 1 puff every 4 hours as needed-administered 6/13/19 (1 dose).</p> <p>Interview on 6/18/19 with the Assistant Health and Wellness Coordinator (AHCW) revealed: -She was responsible for making the pharmacy list or calling pharmacy daily with any new orders or changes to orders. -She was responsible for packing the medication boxes weekly. The pharmacy delivered meds on Friday. She and the Health and Wellness Coordinator (HWC) typed MARs for the upcoming week and placed with packed meds for shift change on Wednesdays. -The HWC was on vacation during this survey. -She was not aware some orders for Client #3 were missing or that MARs were written incorrectly.</p> <p>Interview on 6/19/19 with the Program Manager revealed: -All field staff received updated medication administration training following the previous survey. -Admissions office was responsible for following up with families to get physicians orders prior to arrival but admitted that didn't always happen.</p>	V 118		



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V 118	<p>Continued From page 4</p> <p>They preferred to have families make the necessary contacts with community doctors to get the orders. They also questioned the ethical dilemma of not administering the needed medications kids arrived with.</p> <p>Review on 6/19/19 of Plan of Protection signed by Program Manager dated 6/19/19 revealed: "What will you immediately do to correct the above rule violations in order to protect clients from further risk and/or additional harm?"</p> <ul style="list-style-type: none"> <li>- Obtaining Orders for Students:</li> <li>- All admissions team members will be retrained on the importance of informing and supporting prospective families to have medication orders by time of intake.</li> <li>- Additionally, key elements/requirements of orders will be clearly defined and shared with admissions and medical team members and prospective families.</li> <li>- For "Daily Incoming Admissions*" email, a section will be added regarding status of orders for medications and designated admissions person. This will be updated with each day leading up to the admission and will be the responsibility of the designated admissions staff person for that family, to obtain orders prior to admission.*</li> <li>- *The "Daily Incoming Admissions email" lays out all of the known incoming students for the future and gives specific, relevant information for various departments and is sent to all pertinent staff.</li> <li>- Upon confirmation of enrollment date Health and Wellness department will send an introduction email to a family reiterating the need for orders prior to or on the</li> </ul>	V 118		

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PRINTED: 07/11/2019  
FORM APPROVED

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V 118	Continued From page 5  date of enrollment. - Upon admission the admissions facilitator (admissions counselor/program director) will review medications and corresponding orders and document the review with a provided form. If there is a discrepancy with medications parents will be asked to contact the prescribing physician for clarity during the admissions process. As a result of the aforementioned review it will be the assigned admissions facilitator oversight to assure compliance. - A checklist will be created for intake process, specifically around medications. It will include a section to be signed by staff member counting medication and building MAR, acknowledging that orders have been referenced in the building of the MAR. Coordination of Care (Operations): - For future incoming clients, if orders are unclear, intended to change, or provide more latitude than is typical, Health and Wellness Department will ensure family and/or prescribing physician are contacted in a timely manner. Orders will be reviewed upon admission by admission facilitator and presented to Health and Wellness Department if clarity is needed. Program Director will provide oversight of process. Describe your plans to make sure the above happens. - Program Director will monitor and communicate with identified responsible parties daily, until objectives have been met. Items above will be audited intermittently by HR [Human Resources] Director as an additional check and balance."	V 118		

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V 118	Continued From page 6  Client #3 was admitted on 6/6/19 without orders for 8 medications for acne/skin rashes, depression, hypothyroidism and birth control. She was administered from 4 to 12 doses of each of those medications without orders. The one physician's order available at admission for Topamax to prevent migraines, was to allow the 16-year-old client to adjust the dosage as she saw fit. The facility failed to follow up with the prescribing physician for clarification about administration and Client #3 continued to receive the medication as written on the bottle not as per order. Client #2 was admitted on 5/15/19 with medication for skin rash. That medication had not been administered since admission and was incorrectly recorded on the MAR, which is the guide for field staff to follow. Client #1 was admitted on 4/4/19 and was administered an antibiotic for 7 days without an order. There was no system put into place following the original survey on 3/25/19 to ensure physician orders were obtained at admission for all medications to be administered to clients; to ensure MARs matched the orders and to ensure coordination with other medical providers around medication changes. These failures are detrimental to health, safety and welfare of the clients and constitute an imposed Type B rule violation. An administrative penalty of \$200.00 per day is imposed for failure to correct within 45th days.	V 118		
V 278	27G .5203 Res. Tx. Camp - Operations  10A NCAC 27G .5203 OPERATIONS (a) Each facility shall develop and implement written policies and procedures on basic care and safety. (b) In accordance with the schedules developed	V 278	Coordination of Care (Operations): - If orders are unclear, intended to change, or provide more latitude than is typical, HWD will ensure family and/or prescribing physician are contacted for clarification.	

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V 278	<p>Continued From page 7</p> <p>by the Program Director, staff shall maintain the following distance from the campers:</p> <p>(1) During waking hours, staff shall be within sight or voice range of the campers.</p> <p>(2) During sleeping hours, staff shall be located within voice range of the campers.</p> <p>This Rule is not met as evidenced by: Based on observation, record review and interviews the facility failed to implement procedures for the care and safety for 1 of 6 audited clients (Client #3). The findings are:</p> <p>Record review on 6/18/19 for Client #3 revealed: -Admission date of 6/6/19 with diagnoses of unspecified Anxiety Disorder, Attention Deficit Hyperactivity Disorder, Cannabis Use Disorder, Major Depressive Disorder, Asthma and Hashimoto Thyroiditis. Age-16 years -Physician's order dated 6/4/19 for Topamax 25mg daily in the evening for chronic migraine prevention. Documentation that was included in this order noted, "...she [Client #3] should be allowed to adjust her dose as needed increasing weekly in 25mg increments to a maximum dose of 100mg in the evening. She may decrease the dose in 25mg increments as well if she sees fit ...."</p> <p>-Review on 6/18/19 of Medication Administration Records from 6/6/19-6/18/19 revealed: Topiramate (Topamax) 25mg was documented as being administered 3 tabs at bedtime.</p> <p>Observation on 6/18/19 at approximately 11:30am at the camp site revealed: -Medication bottle of Topamax 25mg for Client #3 with instructions- Take 3 tabs at bedtime.</p>	V 278		



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V 278	<p>Continued From page 8</p> <p>Interview on 3/25/19 with the Program Director revealed:</p> <ul style="list-style-type: none"> <li>-He could locate 2 emails connecting with Client #3's mom regarding needed prescriptions but no reference to clarification of the Topamax order.</li> <li>-They should have obtained specific information from the prescribing physician about how to administer the Topamax.</li> <li>-The Health and Wellness staff should make sure the MARs match the orders not the medication bottles.</li> </ul> <p>This deficiency is cross referenced into 10A NCAC 27G .0209 Medication Requirements (V118) for a failure to correct Type B rule violation.</p>	V 278		