

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

PRINTED: 01/15/2026  
FORM APPROVED  
OMB NO. 0938-0391

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  34G093	(X2) MULTIPLE CONSTRUCTION A. BUILDING _____  B. WING _____	(X3) DATE SURVEY COMPLETED  01/13/2026
NAME OF PROVIDER OR SUPPLIER  BROOKWOOD HOME		STREET ADDRESS, CITY, STATE, ZIP CODE 1254 BROOKHAVEN DRIVE LINCOLNTON, NC 28092	

(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
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E 039 EP Testing Requirements  
CFR(s): 483.475(d)(2)

§416.54(d)(2), §418.113(d)(2), §441.184(d)(2), §460.84(d)(2), §482.15(d)(2), §483.73(d)(2), §483.475(d)(2), §484.102(d)(2), §485.68(d)(2), §485.542(d)(2), §485.625(d)(2), §485.727(d)(2), §485.920(d)(2), §491.12(d)(2), §494.62(d)(2).

\*[For ASCs at §416.54, CORFs at §485.68, REHs at §485.542, OPO, "Organizations" under §485.727, CMHCs at §485.920, RHCs/FQHCs at §491.12, and ESRD Facilities at §494.62];

(2) Testing. The [facility] must conduct exercises to test the emergency plan annually. The [facility] must do all of the following:

- (i) Participate in a full-scale exercise that is community-based every 2 years; or
  - (A) When a community-based exercise is not accessible, conduct a facility-based functional exercise every 2 years; or
  - (B) If the [facility] experiences an actual natural or man-made emergency that requires activation of the emergency plan, the [facility] is exempt from engaging in its next required community-based or individual, facility-based functional exercise following the onset of the actual event.
- (ii) Conduct an additional exercise at least every 2 years, opposite the year the full-scale or functional exercise under paragraph (d)(2)(i) of this section is conducted, that may include, but is not limited to the following:
  - (A) A second full-scale exercise that is community-based or individual, facility-based functional exercise; or
  - (B) A mock disaster drill; or
  - (C) A tabletop exercise or workshop that is led by

E 039

E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.

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

*Admi Dale*

TITLE

*Executive Director*

(X6) DATE

*2/10/20*

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 039	Continued From page 1 a facilitator and includes a group discussion using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan. (iii) Analyze the [facility's] response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the [facility's] emergency plan, as needed.  *[For Hospices at 418.113(d):] (2) Testing for hospices that provide care in the patient's home. The hospice must conduct exercises to test the emergency plan at least annually. The hospice must do the following: (i) Participate in a full-scale exercise that is community based every 2 years; or (A) When a community based exercise is not accessible, conduct an individual facility based functional exercise every 2 years; or (B) If the hospice experiences a natural or man-made emergency that requires activation of the emergency plan, the hospital is exempt from engaging in its next required full scale community-based exercise or individual facility-based functional exercise following the onset of the emergency event. (ii) Conduct an additional exercise every 2 years, opposite the year the full-scale or functional exercise under paragraph (d)(2)(i) of this section is conducted, that may include, but is not limited to the following: (A) A second full-scale exercise that is community-based or a facility based functional exercise; or (B) A mock disaster drill; or (C) A tabletop exercise or workshop that is led by a facilitator and includes a group discussion using	E 039	E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.		

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E 039	<p>Continued From page 2</p> <p>a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.</p> <p>(3) Testing for hospices that provide inpatient care directly. The hospice must conduct exercises to test the emergency plan twice per year. The hospice must do the following:</p> <p>(i) Participate in an annual full-scale exercise that is community-based; or</p> <p>(A) When a community-based exercise is not accessible, conduct an annual individual facility-based functional exercise; or</p> <p>(B) If the hospice experiences a natural or man-made emergency that requires activation of the emergency plan, the hospice is exempt from engaging in its next required full-scale community based or facility-based functional exercise following the onset of the emergency event.</p> <p>(ii) Conduct an additional annual exercise that may include, but is not limited to the following:</p> <p>(A) A second full-scale exercise that is community-based or a facility based functional exercise; or</p> <p>(B) A mock disaster drill; or</p> <p>(C) A tabletop exercise or workshop led by a facilitator that includes a group discussion using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.</p> <p>(iii) Analyze the hospice's response to and maintain documentation of all drills, tabletop exercises, and emergency events and revise the hospice's emergency plan, as needed.</p>	E 039	<p>E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.</p>	

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E 039	Continued From page 3 *[For PRFTs at §441.184(d), Hospitals at §482.15(d), CAHs at §485.625(d):] (2) Testing. The [PRTF, Hospital, CAH] must conduct exercises to test the emergency plan twice per year. The [PRTF, Hospital, CAH] must do the following: (i) Participate in an annual full-scale exercise that is community-based; or (A) When a community-based exercise is not accessible, conduct an annual individual, facility-based functional exercise; or (B) If the [PRTF, Hospital, CAH] experiences an actual natural or man-made emergency that requires activation of the emergency plan, the [facility] is exempt from engaging in its next required full-scale community based or individual, facility-based functional exercise following the onset of the emergency event. (ii) Conduct an [additional] annual exercise or and that may include, but is not limited to the following: (A) A second full-scale exercise that is community-based or individual, a facility-based functional exercise; or (B) A mock disaster drill; or (C) A tabletop exercise or workshop that is led by a facilitator and includes a group discussion, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan. (iii) Analyze the [facility's] response to and maintain documentation of all drills, tabletop exercises, and emergency events and revise the [facility's] emergency plan, as needed.  *[For PACE at §460.84(d):]	E 039	E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.		

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E 039	Continued From page 4 (2) Testing. The PACE organization must conduct exercises to test the emergency plan at least annually. The PACE organization must do the following: (i) Participate in an annual full-scale exercise that is community-based; or (A) When a community-based exercise is not accessible, conduct an annual individual, facility-based functional exercise; or (B) If the PACE experiences an actual natural or man-made emergency that requires activation of the emergency plan, the PACE is exempt from engaging in its next required full-scale community based or individual, facility-based functional exercise following the onset of the emergency event. (ii) Conduct an additional exercise every 2 years opposite the year the full-scale or functional exercise under paragraph (d)(2)(i) of this section is conducted that may include, but is not limited to the following: (A) A second full-scale exercise that is community-based or individual, a facility based functional exercise; or (B) A mock disaster drill; or (C) A tabletop exercise or workshop that is led by a facilitator and includes a group discussion, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan. (iii) Analyze the PACE's response to and maintain documentation of all drills, tabletop exercises, and emergency events and revise the PACE's emergency plan, as needed.  *[For LTC Facilities at §483.73(d):] (2) The [LTC facility] must conduct exercises to	E 039	E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.		

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E 039	Continued From page 5 test the emergency plan at least twice per year, including unannounced staff drills using the emergency procedures. The [LTC facility, ICF/IID] must do the following: (i) Participate in an annual full-scale exercise that is community-based; or (A) When a community-based exercise is not accessible, conduct an annual individual, facility-based functional exercise. (B) If the [LTC facility] facility experiences an actual natural or man-made emergency that requires activation of the emergency plan, the LTC facility is exempt from engaging its next required a full-scale community-based or individual, facility-based functional exercise following the onset of the emergency event. (ii) Conduct an additional annual exercise that may include, but is not limited to the following: (A) A second full-scale exercise that is community-based or an individual, facility based functional exercise; or (B) A mock disaster drill; or (C) A tabletop exercise or workshop that is led by a facilitator includes a group discussion, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan. (iii) Analyze the [LTC facility] facility's response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the [LTC facility] facility's emergency plan, as needed.  *[For ICF/IIDs at §483.475(d)]: (2) Testing. The ICF/IID must conduct exercises to test the emergency plan at least twice per year. The ICF/IID must do the following: (i) Participate in an annual full-scale exercise that	E 039	E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.	

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E 039 Continued From page 6  
is community-based; or  
(A) When a community-based exercise is not accessible, conduct an annual individual, facility-based functional exercise; or.  
(B) If the ICF//ID experiences an actual natural or man-made emergency that requires activation of the emergency plan, the ICF//ID is exempt from engaging in its next required full-scale community-based or individual, facility-based functional exercise following the onset of the emergency event.  
(ii) Conduct an additional annual exercise that may include, but is not limited to the following:  
(A) A second full-scale exercise that is community-based or an individual, facility-based functional exercise; or  
(B) A mock disaster drill; or  
(C) A tabletop exercise or workshop that is led by a facilitator and includes a group discussion, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.  
(iii) Analyze the ICF//ID's response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the ICF//ID's emergency plan, as needed.

\*[For HHAs at §484.102]  
(d)(2) Testing. The HHA must conduct exercises to test the emergency plan at least annually. The HHA must do the following:  
(i) Participate in a full-scale exercise that is community-based; or  
(A) When a community-based exercise is not accessible, conduct an annual individual, facility-based functional exercise every 2 years; or.

E 039 E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.

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E 039	Continued From page 7  (B) If the HHA experiences an actual natural or man-made emergency that requires activation of the emergency plan, the HHA is exempt from engaging in its next required full-scale community-based or individual, facility based functional exercise following the onset of the emergency event. (ii) Conduct an additional exercise every 2 years, opposite the year the full-scale or functional exercise under paragraph (d)(2)(i) of this section is conducted, that may include, but is not limited to the following: (A) A second full-scale exercise that is community-based or an individual, facility-based functional exercise; or (B) A mock disaster drill; or (C) A tabletop exercise or workshop that is led by a facilitator and includes a group discussion, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan. (iii) Analyze the HHA's response to and maintain documentation of all drills, tabletop exercises, and emergency events, and revise the HHA's emergency plan, as needed.  *[For OPOs at §486.360] (d)(2) Testing. The OPO must conduct exercises to test the emergency plan. The OPO must do the following: (I) Conduct a paper-based, tabletop exercise or workshop at least annually. A tabletop exercise is led by a facilitator and includes a group discussion, using a narrated, clinically relevant emergency scenario, and a set of problem statements, directed messages, or prepared	E 039	E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.	

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E 039 Continued From page 8

questions designed to challenge an emergency plan. If the OPO experiences an actual natural or man-made emergency that requires activation of the emergency plan, the OPO is exempt from engaging in its next required testing exercise following the onset of the emergency event.

(ii) Analyze the OPO's response to and maintain documentation of all tabletop exercises, and emergency events, and revise the [RNHCI's and OPO's] emergency plan, as needed.

\*[ RNCHIs at §403.748]:

(d)(2) Testing. The RNHCI must conduct exercises to test the emergency plan. The RNHCI must do the following:

(i) Conduct a paper-based, tabletop exercise at least annually. A tabletop exercise is a group discussion led by a facilitator, using a narrated, clinically-relevant emergency scenario, and a set of problem statements, directed messages, or prepared questions designed to challenge an emergency plan.

(ii) Analyze the RNHCI's response to and maintain documentation of all tabletop exercises, and emergency events, and revise the RNHCI's emergency plan, as needed.

This STANDARD is not met as evidenced by:

Based on record review and interviews, the facility failed to show evidence of exercises to verify testing of the emergency preparedness plan (EPP). The finding is:

Review of facility documentation on 1/13/26 revealed an EPP dated 3/27/25. Further review of the facility's EPP did not reveal evidence of a mock drill, tabletop exercise, or full-scale community-based exercise to test the facility's EPP.

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E 039	Continued From page 9 Interview with the qualified intellectual disabilities professional (QIDP) on 1/13/26 revealed that evidence of a tabletop exercise, mock drill, or full-scale exercise could not be found during the survey. Further interview with the QIDP revealed a live event was completed, however, the documentation could not be found. Continued interview with the QIDP verified that staff and management should complete all emergency preparedness exercises to test the EPP as required.	E 039	E 039: A Tabletop Exercise, mock trial, and Full-Scale Drill will be alternated annually with proper documentation following. RHA staff will receive training on both Tabletop Exercise and Full Scale Drills. The Emergency Preparedness Plan Book will be reviewed by clinical staff and reviewed with Direct Support Professionals at monthly house meetings. All drills and exercises will be filed under clinical leadership with a copy in the Emergency Preparedness Book.	
W 249	PROGRAM IMPLEMENTATION CFR(s): 483.440(d)(1)  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.  This STANDARD is not met as evidenced by: Based on observations, record review and interview, the facility failed to ensure 4 of 6 audited clients (#3, #4, #5, #6) received a continuous active treatment program consisting of needed interventions through formal and informal training opportunities. The findings are:  Observation in the group home on 1/13/26 from 4:00 PM - 5:15 PM revealed four clients to sit in the homes living room unengaged in formal or informal activities. Further observation during this same time revealed staff B to ask clients #3, #4,	W 249	W 249: All staff will receive further training on active treatment for all individuals in the home. Staff will receive training on the skill technique of PIRting, while also understanding client's rights. Staff will receive training on providing different opportunities to ensure engagement for the clients. Staff will receive training on communication styles-offering informal and formal opportunities for individuals to express independence while also remaining a safe and healthy teaching facility. Finally, staff will receive further training on all the individuals plans and programs with adequate documentation.	

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STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  34G093	(X2) MULTIPLE CONSTRUCTION A. BUILDING _____  B. WING _____		(X3) DATE SURVEY COMPLETED  01/13/2026
NAME OF PROVIDER OR SUPPLIER  BROOKWOOD HOME			STREET ADDRESS, CITY, STATE, ZIP CODE 1254 BROOKHAVEN DRIVE LINCOLNTON, NC 28092		
(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 249	Continued From page 10 #5 and #6 if they'd prefer to watch something on the television or engage in an activity with "no" as the combined response. Continued observation revealed staff B to sit with clients #3, #4, #5 and #6 and engage in conversation. Subsequent observation at 5:13 PM revealed staff A to call all clients to "wash hands" for the dinner meal. Additional observation revealed client #3 was not offered opportunities to count by 5's up to 25 or increase fluids; client #4 to complete clean table, complete laundry routine or do activities; client #5 to sweep room, mop room, or make change for \$2 and client #6 to tolerate stretching, identify food or match objects and socks.  Review of client #3's record on 1/13/26 revealed a person-centered plan (PCP) dated 5/28/25 which indicated training objective as follows: appropriate use of items, follow mealtime guidelines, closing door before using the restroom, counting by 5's up to 25, and increase fluid intake to one liter daily.  Review of client #4's record on 1/13/26 revealed a PCP dated 12/13/25 which indicate training objectives as follows: hair care routine, clean table, clean mirror, laundry routine and activity.  Review of client #5's record on 1/13/26 revealed a PCP dated 3/7/25 which indicate training objectives as follows: thorough tooth brushing, sweep floor, mop floor, clean doorknobs, and make change for \$2.  Review of client #6's record on 1/13/26 revealed a PCP dated 9/20/25 which indicate training objectives as follows: toothbrushing, getting dressed, bathing, tolerate stretching, and, identifies food, matches objects and matches	W 249	W 249: All staff will receive further training on active treatment for all individuals in the home. Staff will receive training on the skill technique of PIRTING, while also understanding client's rights. Staff will receive training on providing different opportunities to ensure engagement for the clients. Staff will receive training on communication styles-offering informal and formal opportunities for individuals to express independence while also remaining a safe and healthy teaching facility. Finally, staff will receive further training on all the individuals plans and programs with adequate documentation.		

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CENTERS FOR MEDICARE & MEDICAID SERVICES

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W 249	Continued From page 11 socks.  Interview with the qualified intellectual disabilities professional (QIDP) on 1/13/26 confirmed the one hour and fifteen minute duration of idle time was excessive and clients #3, #4, #5, and #6 should have been engaged in other opportunities to promote progress towards the achievement of goals and objectives. Continued interview with the QIDP confirmed client #6 should have been offered the opportunity to assist with dinner preparation to identify foods.	W 249	W 249: All staff will receive further training on active treatment for all individuals in the home. Staff will receive training on the skill technique of PIRTING, while also understanding client's rights. Staff will receive training on providing different opportunities to ensure engagement for the clients. Staff will receive training on communication styles-offering informal and formal opportunities for individuals to express independence while also remaining a safe and healthy teaching facility. Finally, staff will receive further training on all the individuals plans and programs with adequate documentation.	
W 369	DRUG ADMINISTRATION CFR(s): 483.460(k)(2)  The system for drug administration must assure that all drugs, including those that are self-administered, are administered without error. This STANDARD is not met as evidenced by: Based on observation, record review and interview, the facility failed to ensure that all drugs were administered without error for 1 of 6 audited clients (#2). The finding is:  Observation in the group home on 1/13/26 at 7:25 AM revealed client #2 to receive the following medications: Clonidine 0.1 ER, Vitamin D3 2000 IU, Methylphenidate 10mg, and Focalin XR 40mg. Continued observations revealed client #2 to take his medications without his blood pressure being taken by staff.  Review of client #2's record on 1/13/26 revealed physician's orders dated 10/28/25. Review of the physician's orders indicated Clonidine 0.1 ER - take 2 tablets by mouth every morning for behaviors **check blood pressure every morning before medications** (call nursing if blood	W 369	W 369: Staff received individualized training on medication administration from the nursing department at the Maiden Unit. Nursing completed a follow up with individual day of to ensure his health and safety.	

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**W 369** Continued From page 12  
pressure is greater than 150/90 or less than 90/50).

Interview with the facility nurse on 1/13/26 confirmed client #2's physician's orders are current. Continued interview revealed if client #2's blood pressure is too low it may "bottom out" if he takes the Clonidine. Further interview confirmed staff should check client #2's blood pressure every morning prior to medication administration.

**W 369** W 369: Staff received individualized training on medication administration from the nursing department at the Maiden Unit. Nursing completed a follow up with individual day of to ensure his health and safety.