

Department of Human Services
Bureau of Human Service Licensing
LICENSING INSPECTION SUMMARY - PUBLIC

August 29, 2024

[REDACTED], VICE PRESIDENT OF OPERATIONS
NATIONAL HEALTH MANAGEMENT LLC
[REDACTED]

RE: INDEPENDENCE COURT OF
QUAKERTOWN
1660 PARK AVENUE
QUAKERTOWN, PA, 18951
LICENSE/COC#: 12703

Dear [REDACTED],

As a result of the Pennsylvania Department of Human Services, Bureau of Human Service Licensing review on 07/01/2024 of the above facility, we have determined that your submitted plan of correction is fully implemented. Continued compliance must be maintained.

Please note that you are required to post this Licensing Inspection Summary at your facility in a conspicuous location.

Sincerely,
[REDACTED]

cc: Pennsylvania Bureau of Human Service Licensing

Facility Information

Name: INDEPENDENCE COURT OF QUAKERTOWN License #: 12703 License Expiration: 07/22/2025
Address: 1660 PARK AVENUE, QUAKERTOWN, PA 18951
County: BUCKS Region: SOUTHEAST

Administrator

Name: [Redacted] Phone: [Redacted] Email: [Redacted]

Legal Entity

Name: NATIONAL HEALTH MANAGEMENT LLC
Address: [Redacted]

Certificate(s) of Occupancy

Staffing Hours

Resident Support Staff: Total Daily Staff: 92 Waking Staff: 69

Inspection Information

Type: Partial Notice: Unannounced BHA Docket #:
Reason: Complaint, Incident Exit Conference Date: 07/01/2024

Inspection Dates and Department Representative

07/01/2024 - On-Site: [Redacted]

Resident Demographic Data as of Inspection Dates

General Information License Capacity: 120 Residents Served: 81
Secured Dementia Care Unit In Home: No Area: Capacity: Residents Served:
Hospice Current Residents: xx
Number of Residents Who:
Receive Supplemental Security Income: 0 Are 60 Years of Age or Older: 81
Diagnosed with Mental Illness: 7 Diagnosed with Intellectual Disability: 0
Have Mobility Need: 11 Have Physical Disability: 3

Inspections / Reviews

07/01/2024 Partial
Lead Inspector: [Redacted] Follow-Up Type: POC Submission Follow-Up Date: 07/27/2024

07/26/2024 - POC Submission
Submitted By: [Redacted] Date Submitted: 08/28/2024
Reviewer: [Redacted] Follow-Up Type: POC Submission Follow-Up Date: 07/31/2024

Inspections / Reviews *(continued)*

07/30/2024 POC Submission

Submitted By: [REDACTED]

Date Submitted: 08/28/2024

Reviewer: [REDACTED]

Follow Up Type: Document Submission Follow Up Date: 08/30/2024

08/29/2024 Document Submission

Submitted By: [REDACTED]

Date Submitted: 08/28/2024

Reviewer: [REDACTED]

Follow Up Type: Not Required

17 - Record Confidentiality

1. Requirements

2600.

17. Resident records shall be confidential, and, except in emergencies, may not be accessible to anyone other than the resident, the resident's designated person if any, staff persons for the purpose of providing services to the resident, agents of the Department and the long-term care ombudsman without the written consent of the resident, an individual holding the resident's power of attorney for health care or health care proxy or a resident's designated person, or if a court orders disclosure.

Description of Violation

On multiple occasions, staff A took pictures of a community bulletin board with residents' health information (including doctor visits, lab results, falls and etc.), pictures of medication administration screens with residents' photos and resident's medication information, and pictures of residents' medications and shared them with an individual who is not affiliated with the home and who is not the resident, the resident's designated person or staff persons for the purpose of providing services to the resident.

Plan of Correction

Accept [REDACTED] - 07/26/2024)

APS (Adult Protective Services) and AAA (Area Agency on Aging) issued a complaint.

ACTION:

- On 6/18/2024, Administrator immediately removed Staff A from the schedule pending investigation.
- On 6/24/2024, Administrator terminated Staff A.
- Between 6/19/2024 and 6/21/2024, Administrator conducted in-service training for all staff on the following topics:
2600.42-Resident Rights,
Facility Chain of Command,
Facility Employee Handbook:(Cell phone Policy, Video Recording policy, HIPAA)
(see attached training acknowledgement 1)
- On July 17, 2024, Administrator held and in-service and had Bucks County Ombudsman, Nancy Morgan in-service all staff on:
2600.17 Record Confidentiality
42s Privacy
Unauthorized Photographs and Recordings of residents.
Administrator in-serviced all staff on Violation 2600.17. (see attached training acknowledgements #2)
- Ongoing
- Record Confidentiality will be a topic of discussion at the July 2024 Quality Assurance (QA) meeting with leadership and will continue to be discussed monthly to include staff adherence to residents' confidentiality.
- Administrator will ensure that all staff receive annual in-service training on Record Confidentiality.
- Administrator will ensure that new hires will receive training on Record Confidentiality within their first 40 hours.

Proposed Overall Completion Date: 07/26/2024

Licensee's Proposed Overall Completion Date: 07/26/2024

Implemented [REDACTED] - 08/29/2024)

42c - Treatment of Residents

2. Requirements

2600.

- 42.c. A resident shall be treated with dignity and respect.

42c - Treatment of Residents (continued)

Description of Violation

Staff A took pictures of following residents at their most vulnerable moments and shared them with an individual who is not affiliated with the home between [REDACTED]

1. resident #1 lying on the floor naked from the waist up
2. resident #2 standing on the stairs entirely naked
3. resident #3 sleeping in an armchair in the common area

Repeat Violation: 03/14/2024

Plan of Correction

Accept ([REDACTED]) - 07/26/2024)

APS (Adult Protective Services) and AAA (Area Agency on Aging) issued a complaint.

Action

- On June 18, 2024, Administrator immediately removed Staff A from the schedule pending investigation.
- On June 24, 2024, Staff A was terminated by Administrator.
- Between June 19, 2024 and June 21, 2024, the Administrator conducted a comprehensive in-service for all staff on several key policies:

2600.42-Resident Rights (with a focus on Dignity and Respect)

Facility Chain of Command

Facility Employee Handbook, specifically the Cell Phone Policy and Video Recording Policy

HIPAA

- On July 17, 2024, Administrator and the Bucks County Ombudsman, [REDACTED], conducted an in-service for all staff covering:

2600.17 Record Confidentiality

Privacy, Unauthorized Photographs and Recordings of residents and Resident Rights-Dignity and respect.

Administrator also in-serviced all staff on Violation 2600. 42c..

Ongoing Compliance:

- The Facility's July 2024 Quality Assurance meeting will focus on Resident Rights-Dignity and Respect. This will be continued until December 2024.
- To ensure ongoing compliance the Administrator will conduct 5 resident interviews until 2024.
- Administrator will also review Resident Rights twice annually at Resident Council Meeting.
- Administrator will continue to have all staff trained annually on Resident Rights.
- Administrator will continue to have all new hires trained on Resident Rights on their first day of hire.

Proposed Overall Completion Date: 07/26/2024

Licensee's Proposed Overall Completion Date: 07/26/2024

Implemented ([REDACTED]) - 08/29/2024)

42s - Privacy

3. Requirements

2600.

42.s. A resident has the right to privacy of self and possessions. Privacy shall be provided to the resident during bathing, dressing, changing and medical procedures.

Description of Violation

Staff A took pictures of following residents and shared them with an individual who is not affiliated with the home

42s Privacy (continued)

between [REDACTED]

- 1. resident #1 lying on the floor naked from the waist up
- 2. resident #2 standing on the stairs entirely naked
- 3. resident #3 sleeping in an armchair in the common area

Staff A video recorded resident #4 and #5 on separate occasions while the residents were being escorted to the resident's room or to other areas of the home and shared the video clips with an individual who is not affiliated with the home.

Plan of Correction

Accept [REDACTED] - 07/26/2024)

APS (Adult Protective Services) and AAA (Area Agency on Aging) issued a complaint.

Action:

On June 18, 2024, Staff A was removed from the schedule pending investigation.

On June 24, 2024, Staff A was subsequently terminated.

By June 21, 2024, the Administrator conducted an in service for all staff on the following:

2600.42 Resident Rights

Facility Chain of Command

Facility Employee Handbook, specifically the Cell Phone Policy and Video Recording Policy

HIPAA

On July 17, 2024, the Bucks County Ombudsman conducted an in service for all staff covering:

2600.17 Record Confidentiality

Privacy, Unauthorized Photographs and Recordings of residents and Resident Rights (see attached training acknowledgement)

Ongoing:

The Facility's July 2024 Quality Assurance meeting will focus on Resident Rights Dignity and Respect and Privacy. This will continue to be a topic at Quality Assurance meetings until December 2024.

To ensure ongoing compliance, the Administrator will to conduct 5 resident interviews every month remaining this year focusing on privacy and dignity and respect.

Administrator will also review Resident Rights twice annually at Resident Council Meeting.

Administrator will continue to have all staff trained on Resident Rights annually.

Administrator will have new hires trained on Resident Rights on their first day.

Proposed Overall Completion Date: 07/26/2024

Licensee's Proposed Overall Completion Date: 07/26/2024

Implemented [REDACTED] - 08/29/2024)

185a - Implement Storage Procedures

4. Requirements

2600.

185.a. The home shall develop and implement procedures for the safe storage, access, security, distribution and use of medications and medical equipment by trained staff persons.

Description of Violation

Sometime between [REDACTED], staff A allowed a child, approximately 5 years of age, access to an open medication drawer.

185a Implement Storage Procedures (continued)

Plan of Correction

Accept [REDACTED] - 07/26/2024)

Action:

Between June All direct care staff have received training from the Director of Nursing on implementing storage procedures according to policy 2600.185a.

On July 17, 2024, the Administrator and Bucks County Ombudsman, [REDACTED], conducted an in service for all staff covering:

2600.17 Record Confidentiality, Privacy, Unauthorized Photographs and Recordings of residents and Resident Rights Dignity and respect.

On July 17, 2024, The Administrator reviewed the Employee Handbook.

Employees are prohibited from having visitors while on duty.

Visitors are restricted from accessing areas containing confidential information.

Only trained staff members are permitted to access medications.

Ongoing:

The violation related to these policies will be specifically reviewed at the Facility's July 2024 Quality Assurance meeting and monthly thereafter until December 2024.

Administrator will have all staff trained yearly on 2600.185a, Implement Storage Procedures.

Administrator will have new hires trained within their first 40 hours of hire.

Licensee's Proposed Overall Completion Date: 07/26/2024

Implemented [REDACTED] - 08/29/2024)

187b - Date/Time of Medication Admin.

5. Requirements

2600.

187.b. The information in subsection (a)(13) and (14) shall be recorded at the time the medication is administered.

Description of Violation

Resident #6 is prescribed [REDACTED] every 12 hours as needed. The resident's June medication administration record (MAR) does not include the initials of staff member B, who administered this medication on [REDACTED]

Resident #7 is prescribed [REDACTED] at bed time and every 6 hours as needed (PRN). The PRN administrations on the following dates/times were not documented on the resident's June MAR:

- [REDACTED]

187b - Date/Time of Medication Admin. (continued)

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Plan of Correction

Accept [REDACTED] - 07/30/2024)

On July 1, 2024 there was a discovery of a violation related to 2600, 187b-Date/Time of Medication Administration.

Action:

-July 1, 2024- July 4th, the Director of Nursing in-serviced all Medication Assistants. on 2600, 187b. Date/Time of Medication Administration.

Ongoing:

- On July 18, 2024, the Director of Nursing implemented a Narcotic audit sheet to be used by Medication Assistants and Nurses.

-By July 22, 2024, The Director of Nursing trained all current medication assistants on the new procedure. The Narcotic audit sheet will track the administration of narcotics by requiring medication assistants or nurses to initial together during change of shift narcotic count that they were administered and documented in the following two locations, The Narcotic Count book and The Electronic Medication Administration Record.

-To ensure effective implementation of the Narcotic audit sheet and ongoing compliance, the Director of Nursing will review the audit sheet on a weekly basis. The Director of Nursing will check that the audit sheet is being completed according to the new procedure. This includes verifying that all necessary information is recorded accurately.

-The violation will be a topic of discussion at the upcoming Quality Assurance July 2024 and on a monthly basis thereafter until December 2024 to ensure that the incident is thoroughly examined and compliance is maintained.

-Administrator will have all Medication Assistants or Nurses, trained annually on 2600, 187b Date/Time of Medication Administration.

-Administrator will have all new Medication Assistants or Nurses trained within their first 40 hours of hire.

Proposed Overall Completion Date: 07/31/2024

Licensee's Proposed Overall Completion Date: 07/31/2024

Implemented ([REDACTED] - 08/29/2024)

187d - Follow Prescriber's Orders

6. Requirements

2600.

187.d. The home shall follow the directions of the prescriber.

187d - Follow Prescriber's Orders (continued)

Description of Violation

Resident #6 is prescribed [REDACTED] every 12 hours as needed. However, the resident was administered this medication on [REDACTED] and then again at [REDACTED]

Resident #7 is prescribed [REDACTED] at bed time and every 6 hours as needed (PRN). On [REDACTED], this medication was administered at [REDACTED] and again at [REDACTED]. On [REDACTED] this medication was administered at midnight and at 4:37am. On 06/22/2024 this medication was administered at [REDACTED] and again at [REDACTED]

Plan of Correction

Accept ([REDACTED] - 07/30/2024)

On July 1, 2024 there was a discovery of violation related to 2600,187d-Date/Time of Medication Administration.

Action:

The Director of Nursing initiated training sessions starting July 1, 2024 for all Medication Assistants on 2600.187d-Following Prescriber's Orders. All Medication Assistants have been trained by 7/4/2024 on this violation.

Ongoing:

On July 18, 2024, the Director of Nursing implemented a Narcotic audit sheet to be used by Medication Assistants and Nurses.

-By July 22, 2024, The Director of Nursing trained all current medication assistants on the new procedure. The Narcotic audit sheet will track the administration of narcotics by requiring medication assistants or nurses to initial together during change of shift narcotic count that they were administered and documented in the following two locations, The Narcotic Count book and The Electronic Medication Administration Record.

-To ensure effective implementation of the Narcotic audit sheet and ongoing compliance, the Director of Nursing will review the audit sheet on a weekly basis. The Director of Nursing will check that the audit sheet is being completed according to the new procedure. This includes verifying that all necessary information is recorded accurately.

-This violation will be reviewed at July's 2024 Quality Assurance meeting and monthly thereafter until December 2024.

-Administrator will have all medication Assistants and Nurses trained annually on 2600.187b.

-Administrator will have all newly hired Medication Assistants and Nurses trained within their first 40 hours of hire.

Proposed Overall Completion Date: 07/31/2024

Licensee's Proposed Overall Completion Date: 07/31/2024

Implemented ([REDACTED] - 08/29/2024)