

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:	X2) MULTIPLE CONSTRUCTION A. BUILDING <u>00</u> B. WING _____	X3) DATE SURVEY COMPLETED 06/08/2015
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NAME OF PROVIDER OR SUPPLIER VITAL HOME & HEALTHCARE INC	STREET ADDRESS, CITY, STATE, ZIP CODE 2834 C 45TH STREET HIGHLAND, IN 46322
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(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
N 0000 Bldg. 00	<p>This was a State home health complaint investigation survey.</p> <p>Survey Date: 6/8/15</p> <p>Facility ID: IN002870</p> <p>Medicaid number: N/A</p> <p>Facility unduplicated census: 20</p> <p>Active Patients: 1</p> <p>Complaint Number IN0075049 Substantiated: State deficiencies related to the allegations are cited. Deficiencies unrelated to the allegations are cited.</p> <p>QR: JE 6/22/15</p>	N 0000		
N 0440 Bldg. 00	<p>410 IAC 17-12-1(a) Home health agency administration/management Rule 12 Sec. 1(a) Organization, services furnished, administrative control, and lines of authority for the delegation of responsibility down to the patient care level shall be: (1) clearly set forth in writing; and (2) readily identifiable.</p> <p>Based on Interview, agency document</p>	N 0440	Correction of cited deficiency:	07/07/2015

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

TITLE

(X6) DATE

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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	<p>review, and agency policy review, the agency failed to ensure the administrator and alternate administrator roles were accurate on the organizational chart.</p> <p>Findings</p> <p>1. Interview on 6/8/15 at 2:00 PM, employee A, alternate nursing director, indicated employee F, is the administrator and employee G, is the alternate administrator of the agency.</p> <p>2. Interview on 6/9/15 at 10:00 AM, employee F, listed administrator, indicated that she was the alternate administrator of the agency up until last week, 6/1/15. Indicated she is still an employee of the agency and remains on salary but is only working 1 day a week now.</p> <p>3. Agency document titled " Vital Home & Healthcare, INC. Indiana Organizational Structure ", dated 030101, lists employee F as administrator and there is no listing for alternate administrator.</p> <p>4. Agency policy titled "Governing Body" dated 11/09/00, states, "1.0 PURPOSES 1.1 Define and describe an entity that serves as the governing body of Vital Home & Healthcare, Inc. ... 1.4</p>		<p>Updated organization chart. Prevention of deficiency from occurring in the future: Organizational chart with be updated and maintained when changes occur. Responsible Person: Administrator/Alternate Administrator Agency monitoring: Performance Improvement Manager to develop tool for tracking and trending quarterly for Organizational Chart maintenance for 100% threshold for not less than one year.</p>				

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N 0441 Bldg. 00	<p>Establish a clear line of authority and a guide for operations of the agency"</p> <p>5. Agency policy titled "Administrator" dated 11-11-00 and 11-11-05, states, "1.0 PURPOSES 1.1 Establish the qualifications, appointment process and duties of the agency administrator 1.2 Ensure a qualified administrator organizes and directs the ongoing functions of the agency."</p> <p>410 IAC 17-12-1(a) Home health agency administration/management Rule 12 Sec. 1(a) Administrative and supervisory responsibilities shall not be delegated to another agency or organization, and all services not furnished directly, including services provided through a branch office, shall be monitored and controlled by the parent agency.</p> <p>Based on interview, agency policy review, and agency document review, the agency failed to ensure all employee records and agency brochures for the agency and available from the agency.</p> <p>Findings</p> <p>1. Interview on 6/8/15 at 5:15 PM, employee A, alternate nursing director indicated the the employee records provided were all for the agency.</p>	N 0441	<p>Correction of deficiency: All current employee records and brochures are available at the agency for reference as needed. Prevention of deficient from occurring in the future: All new employees records will be established and maintained for reference when needed. Agency brochures will be available on site. Responsible person: Human Resource Assistance/ Administrator/ Alternate Administrator. Agency</p>	07/07/2015

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N 0442 Bldg. 00	<p>Employee A, alternate nursing director, did request employee files for herself and any updates available for the other employee files reviewed from Vital Home & Healthcare Inc. of Tinley Park, IL.</p> <p>2. Undated agency brochure requested from Tinley Park, IL agency provided by employee A, alternate nursing director, states, "VITAL HOME & HEALTHCARE."</p> <p>3. Agency policy titled "Governing Body" dated 11/09/00 states, "1.0 PURPOSES 1.1 Define and describe an entity that serves as the governing body of Vital Home & Healthcare, Inc. ... 3.8.6 Handles all administrative and supervisory functions. 3.8.6.1 The agency does not delegate responsibility to another organization or agency."</p> <p>410 IAC 17-12-1(b) Home health agency administration/management Rule 12 Sec. 1(b) A governing body, or designated person(s) so functioning, shall assume full legal authority and responsibility for the operation of the home health agency. The governing body shall do the following: (1) Appoint a qualified administrator. (2) Adopt and periodically review written bylaws or an acceptable equivalent.</p>		monitoring: Performance Improvement Manager to develop quarterly tracking and trending tool to monitor 100% threshold of compliance for not less than one year.				

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	<p>(3) Oversee the management and fiscal affairs of the home health agency. Based on Interview, agency document review, and agency policy review, the agency failed to ensure there was a governing body for the agency that assumed responsibility for the operation of the agency.</p> <p>Findings</p> <p>1. Interview on 6/8/15 at 2:00 PM, employee A, alternate nursing director, indicated employee H, nursing director, runs the day to day operations of the agency.</p> <p>2. Interview on 6/8/15 at 3:30 PM, employee A, alternate nursing director, indicated all the governing body meeting minutes were provided during this survey.</p> <p>3. Agency document titled "Vital Home & Healthcare, Inc. Governing Body Meeting Agenda Thursday December 12, 2013" dated 12/12/13 is the last Governing Body Meeting minutes provided by employee A, alternate nursing director.</p> <p>4. Agency policy titled "Governing Body" dated 11/09/00, states, "1.0 PURPOSES 1.1 Define and describe an</p>	N 0442	<p>Correction of deficiency: Governing Body meeting and minutes placed in agency manuals for 2013,2014 and 2015 for reference as needed. Prevention of deficiency from occurring in the future: All Governing Body Meeting minutes to be maintained electronically and hard copy documentation at agency for reference when needed. Responsible person: Administrator/ Director of Nursing Agency Monitoring: Development of tracking and trending tool for quarterly monitoring of agency Governing Board meeting binder contains the most current meeting minutes and attendance sheet</p>	07/07/2015			

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N 0444 Bldg. 00	<p>entity that serves as the governing body of Vital Home & Healthcare, Inc. ... 1.4 Establish a clear line of authority and a guide for operations of the agency ... 3.6.1.3 Maintaining liaison with administrator ... 3.7.1 Meets at least once a year with the committee, agency staff and other individuals to assess and evaluate the agency's program, policies, administrative practices and/or goals and objectives ... f) Keep minutes of all meetings ... 3.9 The governing body maintains documentation 3.9.1 Of participation in activities to oversee and review the agency's operations. 3.9.2 To demonstrate execution of responsibilities."</p> <p>410 IAC 17-12-1(c)(1) Home health agency administration/management Rule 12 Sec. 1(c) An individual need not be a home health agency employee or be present full time at the home health agency in order to qualify as its administrator. The administrator, who may also be the supervising physician or registered nurse required by subsection (d), shall do the following: (1) Organize and direct the home health agency's ongoing functions. Based on Interview, agency document review, and agency policy review, the agency failed to ensure the agency had an</p>	N 0444	Correction of cited deficiency: Clarification with employee F that status at Vital Home Healthcare Indiana is as Administrator. In	07/07/2015			

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	<p>administrator that directed the day to day functions of the agency.</p> <p>Findings</p> <p>1. Interview on 6/8/15 at 2:00 PM, employee A, alternate nursing director, indicated employee H, nursing director, runs the day to day operations of the agency.</p> <p>2. Interview on 6/9/15 at 10:00 AM, employee F, listed administrator, indicated she was the alternate administrator of the agency up until last week, 6/1/15. Indicated she is still an employee of the agency and remains on salary but is only working 1 day a week now.</p> <p>3. Agency document titled " Vital Home & Healthcare, INC. Indiana Organizational Structure ", dated 03/01/01, lists employee F as administrator and there is no listing for alternate administrator.</p> <p>4. Agency policy titled "Governing Body" dated 11/09/00, states, "1.0 PURPOSES 1.1 Define and describe an entity that serves as the governing body of Vital Home & Healthcare, Inc. ... 1.4 Establish a clear line of authority and a guide for operations of the agency."</p>		<p>employee F absence the alternate administrator is responsible for day to day functions. Alternate Director of Nursing, employee A, was educated on the roles and responsibilities of Administrator/Alternate Administrator/ Director of Nursing. Organization Chart updated to reflect current chain of command. Prevention of deficiency from occurring in the future: Orientation process to include Organization's structure/Agency Leadership for all employees. Responsible person: Performance Improvement Manager/ Human Resource Assistant Agency Monitoring: Development of quarterly tracking and trending of new agency employee's files for documentation of Organization's Structure/Agency Leadership discussed during orientation process</p>	

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N 0447 Bldg. 00	<p>5. Agency policy titled "Administrator" dated 11/09/00, revised 11-11-00 and 11-11-05, states, "1.0 PURPOSES 1.1 Establish the qualifications, appointment process and duties of the agency administrator 1.2 Ensure a qualified administrator organizes and directs the ongoing functions of the agency ... 3.2.1 Organizes and directs the ongoing functions of the agency at all times. "</p> <p>410 IAC 17-12-1(c)(4) Home health agency administration/management Rule 12 Sec. 1(c)(4) The administrator, who may also be the supervising physician or registered nurse required by subsection (d), shall do the following: (4) Ensure the accuracy of public information materials and activities. Based on interview, observation, agency document review, and agency policy review, the agency failed to ensure accuracy of information provided to the public.</p> <p>Findings</p> <p>1. On 6/8/15 at 4:15 PM, called agency's listed phone number 219-513-2055, the number a patient would call to speak to a nurse, and received a message stating the</p>	N 0447	<p>Correction of cited deficiency: Telephone service was checked and is currently in working order. Prevention of deficiency from occurring in the future: Agency office staff to check telephones on a daily basis to confirm there are no connection issues. Connection issues will be address same day for resolution. Responsible Person: Administrator/ Office support staff Agency Monitoring: Development of agency tracking log for documentation of</p>	07/07/2015

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	<p>number was not in service.</p> <p>2. On 6/8/15 at 4:45 PM, called agency's listed phone number 219-513-205 and again received a message stating the number was not in service.</p> <p>3. Observed during interview on 6/8/15 at 5:40 PM, employee A, alternate nursing director, called the agency's listed phone number 219-513-2055 from her cell phone with it on speaker and she also received a message stating the number was not in service.</p> <p>4. Undated agency brochure provided by employee A, alternate nursing director, states, "VITAL HOME & HEALTHCARE ... Indiana: (219) 513-2055."</p> <p>5. Agency admission folder has sticker on front stating, "VITAL HOME & HEALTH, INC. 2834 C. 45TH Street HIGHLAND, IN - 46322-2905 PH: (219) 513-2055 FAX: (219)523-2056."</p> <p>A. Agency document inside admissions folder titled "MY EMERGENCY PLAN" states, "VITAL HOME & HEALTHCARE, INC. 708-342-7076 (IL) or 219-513-2055(IN)."</p> <p>B. Agency document inside</p>		<p>telephone lines checked daily. Review tracking log for compliance on weekly basis for three weeks meeting 100% threshold then monthly for 3 months meeting 100% threshold and ongoing.</p>	

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	<p>admissions folder flyer reading, "Always remember to ... CALL VITAL FIRST! We can help avoid Hospital visits. A nurse is always available to talk to you. 'CALL VITAL FIRST!' ADVANCED HOME HEALTHCARE, INC 219-513-2055."</p> <p>C. Agency document inside admissions folder titled "Vital Home & Healthcare, Inc. ADVANCE DIRECTIVES - INDIANA RESIDENTS" stated, "ADVANCE DIRECTIVES ... Ask your nurse or therapist or call the nursing supervisor at 219-513-2055."</p> <p>D. Agency document inside admissions folder, titled "VITAL HOME & HEALTHCARE, INC. INDIANA EMERGENCY PLAN KEEP NEAR TELEPHONE" dated 4-2012, stated, "PATIENT ... CALL VITAL HOME &HEALTHCARE, INC. (219) 513-2055."</p> <p>E. Agency document inside admissions folder titled "Notice of Medicare Non-Coverage" dated 12/31/2011 stated, "Vital Home & Healthcare, LLC 2834 45th Street, Suite C Highland, IN 46322 (219) 513-2055."</p> <p>F. Undated agency document inside</p>			

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	<p>admissions folder titled "REQUEST FO TRANSFER OF HOME HEALTH SERVICES" stated, "Vital Home & Healthcare, Inc. 2834 45th Street, Suite C Highland, IN 46322 Phone: (219) 513-2055."</p> <p>G. Undated agency document inside admissions folder titled "Vital Home & Healthcare, Inc. would like to welcome you as a customer" stated, "We are ... regular hours of operation are Monday through Friday, 8:00 am to 5:00 pm ... our telephone number (219) 513-2055."</p> <p>7. Interview on 6/8/15 at 3:00 PM, employee A, alternate nursing director, indicated the agency's hours of operation are 8:00 AM - 5:00 PM, M-F.</p> <p>A. Agency document inside admissions folder titled "Vital Home & Healthcare, Inc. ADVANCE DIRECTIVES-INDIANA RESIDENTS", stated, "ADVANCE DIRECTIVES ... Ask your nurse or therapist or call the nursing supervisor at 219-513-2055 (Monday through Friday 8:00 am to 5:00 pm)."</p> <p>B. Undated agency document inside admissions folder titled "Vital Home & Healthcare, Inc. would like to welcome you as a customer" stated, "We are ...</p>			

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N 0448 Bldg. 00	<p>regular hours of operation are Monday through Friday, 8:00 am to 5:00 pm ... our telephone number (219) 513-2055."</p> <p>C. The state agency has the hours of operation for the agency as 8:30 AM - 4:30 PM.</p> <p>8. Agency policy titled "Governing Body" dated 11/09/00 states, "1.0 PURPOSES ... 3.8.3 Disperses accurate information in publications and advertisements available to the public."</p> <p>410 IAC 17-12-1(c)(5) Home health agency administration/management Rule 12 Sec. 1(c)(5) The administrator, who may also be the supervising physician or registered nurse required by subsection (d), shall do the following: (5) Implement a budgeting and accounting system.</p> <p>Based on interview, agency document review, and agency policy review, the agency failed to ensure the governing body reviewed the agency's budget and fiscal affairs annually.</p> <p>Findings</p> <p>1. Interview on 6/8/15 at 3:30 PM,</p>	N 0448	<p>Correction of cited deficiency: Agency manuals updated to contain agency's budget and fiscal affairs for 2014 and 2015 for reference as needed. Prevention of deficiency from occurring in the future: Agency office manuals with be updated annually to contain agency budget and fiscal affairs. Responsible Person: Administrator/ Performance</p>	07/07/2015

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N 0456	<p>employee A, alternate nursing director, indicated all the governing body meeting minutes were provided during this survey.</p> <p>2. Agency document titled "Vital Home & Healthcare, Inc. Governing Body Meeting Agenda Thursday December 12, 2013 " dated 12/12/13 is the last Governing Body Meeting minutes provided by employee A, assistant nursing director.</p> <p>3. Agency policy titled "Governing Body" dated 11/09/00 states, "1.0 PURPOSES 1.1 Define and describe an entity that serves as the governing body of Vital Home & Healthcare, Inc. ... 3.5 The governing body oversees the fiscal affairs of the agency and 3.5.1 Directs the agency to 3.5.1.1 Prepare an overall plan and a budget that includes an annual operating budget, a capital budget and a long-term capital expenditure plan. 3.5.1.2 Review and update the budget and plan at least annually. 3.5.2 Approves the annual operating budget and long-term capital expenditure plan in writing."</p> <p>410 IAC 17-12-1(e) Home health agency</p>		Improvement Manager Agency Monitoring: Development of tracking log to be placed in agency manuals to identify updating of current documentation to be reviewed on a yearly basis	

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Bldg. 00	<p>administration/management</p> <p>Rule 12 Sec. 1(e) The administrator shall be responsible for an ongoing quality assurance program designed to do the following:</p> <p>(1) Objectively and systematically monitor and evaluate the quality and appropriateness of patient care.</p> <p>(2) Resolve identified problems.</p> <p>(3) Improve patient care.</p> <p>Based on document review, policy review, and interview, the administrator failed to ensure there was an ongoing quality assurance and performance improvement program.</p> <p>Findings</p> <p>1. Interview on 6/8/15 at 3:30 PM, employee A, alternate nursing director, indicated all the governing body meeting minutes were provided during this survey and they included the Quality Meeting minutes.</p> <p>2. Agency document titled "Vital Home & Healthcare, Inc. Synopsis 3rd Quarter Clinical Record Review Quality Meeting 11-21-13 INDIANA" dated 11/21/13 was the most recent Quality Meeting minutes provided by employee A, alternate nursing director. The minutes failed to evidence an ongoing quality assurance program had been implemented in the last year.</p>	N 0456	<p>Correction of cited deficiency:</p> <p>Agency Quality binder is update to contain all quality assurance and performance improvement results for 2013,2014 and 2015. Prevention of deficiency from occurring in the future: Quality Assurance and Performance Improvement results will be maintained electronically and hard copy placed in agency manuals for reference as needed. Responsible Person: Administrator/ Performance Improvement Manager Agency monitoring: Develop tracking log to be placed in QAPI manual for documentation of updating which will be monitored on a quarterly basis which will be ongoing.</p>	07/07/2015			

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	<p>3. Agency policy titled "Administrator" dated 11/09/00, revised 11-11-00 and 11-11-05, states, "1.0 PURPOSES 3.6.2 Participates in the preparation, annual review and update of the overall plan ... 3.6.3 Implements performance improvement priorities. "</p> <p>4. Agency policy titled "Governing Body" dated 11/09/00, states, "1.0 PURPOSES 1.1 Define and describe an entity that serves as the governing body of Vital Home & Healthcare, Inc. ... 3.2.5 Understanding and adopting an approach for performance improvement ... 3.7.1 Meets at least once a year with the committee, agency staff and other individuals to assess and evaluate the agency's program, policies, administrative practices and/or goals and objectives ... 3.7.5 Requires an overall evaluation of the agency's total program at least once a year ... f) Keep minutes of all meetings ... 3.9 The governing body maintains documentation."</p> <p>5. Agency policy titled "Quality Assessment and Performance Improvement" dated 11/09/00, states, "1.0 PURPOSES ... 3.1. The governing body and administration ... 3.1.4 Assumes responsibility for the quality assessment and performance improvement program."</p>			

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N 0458 Bldg. 00	<p>410 IAC 17-12-1(f) Home health agency administration/management Rule 12 Sec. 1(f) Personnel practices for employees shall be supported by written policies. All employees caring for patients in Indiana shall be subject to Indiana licensure, certification, or registration required to perform the respective service. Personnel records of employees who deliver home health services shall be kept current and shall include documentation of orientation to the job, including the following:</p> <ol style="list-style-type: none"> (1) Receipt of job description. (2) Qualifications. (3) A copy of limited criminal history pursuant to IC 16-27-2. (4) A copy of current license, certification, or registration. (5) Annual performance evaluations. <p>Based on interview, agency document review, and agency policy review, the agency failed to ensure all employee files contained an annual evaluation and a criminal history check that met the requirements of Indiana Code 16-27-2 or the expanded criminal history requirements in 4 of 13 (A, C, D, and E)</p>	N 0458	Correction of cited deficiency: All active employee files have a current evaluation performed and criminal history check performed per Indiana Code 16-27-2. Prevention of deficiency from occurring in the future: Yearly evaluation will be performed and maintained in agency employee files. New employee with have criminal history check meeting	07/07/2015

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	<p>employee records reviewed.</p> <p>Findings</p> <p>1. Interview on 6/8/15 at 5:15 PM, employee A, alternate nursing director, indicated the employee records provided were all for the agency. Employee A, alternate nursing director, did request employee files for herself and any updates available for the other employee files reviewed from Vital Home & Healthcare Inc. of Tinley Park, IL. No employee evaluations were included in those files dated after 2013 for review.</p> <p>2. Employee record review of employee A, included a document titled "SAFESCREENER.COM PRO! Background Screening Report", dated 11/10/14. The document did not meet the requirements of IC 16-27-2 nor the expanded criminal history check requirements. No annual evaluations were found in the employee's record.</p> <p>3. Employee record review of employee C, included a document titled "SAFESCREENER.COM PRO! Background Screening Report", dated 3/10/13. The document did not meet the requirements of IC 16-27-2 nor the expanded criminal history check</p>		<p>Indiana Code 16-27-2 at time of hire. Responsible Person: Human Resource Assistance/ Administrator Agency Monitoring: Develop tracking and trending tool to monitor compliance with yearly evaluations and criminal history check on monthly basis. Monthly monitoring will be ongoing to maintain 100% threshold.</p>	

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	<p>requirements. The last annual evaluation in the file was dated 4/1/13.</p> <p>4. Employee record review of employee D, included a document titled "SAFESCREENER.COM PRO! Background Screening Report", dated 2/23/11. The document did not meet the requirements of IC 16-27-2 nor the expanded criminal history check requirements. The last annual evaluation in the file was dated 10/11/12.</p> <p>5. Employee record review of employee E, included a document titled "SAFESCREENER.COM PRO! Background Screening Report", dated 4/6/13. The document did not meet the requirements of IC 16-27-2 nor the expanded criminal history check requirements. No annual evaluations were found in the employee's record.</p> <p>6. Agency policy titled "PERSONNEL RECORDS" dated 11/09/00, states, "1.0 PURPOSES ... 1.2 Ensure required documentation is available to demonstrate compliance with established policies and procedures, and state and federal regulations for all employees ... 3.2.4 Legal and financial information required by state and federal requirements ... 3.2.13 Performance</p>			

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N 0472 Bldg. 00	<p>reviews ... 3.7 The governing body ensures that subunits maintain appropriate personnel records."</p> <p>7. Agency policy titled "Administrator" dated 11/09/00, revised 11-11-00 and 11-11-05, states, "1.0 PURPOSES 3.3.2 Ensures adequate staff education and evaluations ... 3.3.3 Affirms that written personnel policies support personnel practices and patient care. "</p> <p>410 IAC 17-12-2(a) Q A and performance improvement Rule 12 Sec. 2(a) The home health agency must develop, implement, maintain, and evaluate a quality assessment and performance improvement program. The program must reflect the complexity of the home health organization and services (including those services provided directly or under arrangement). The home health agency must take actions that result in improvements in the home health agency's performance across the spectrum of care. The home health agency's quality assessment and performance improvement program must use objective measures. Based on document review, policy review, and interview, the agency failed to ensure a quality assurance and performance improvement program was maintained and evaluated in the agency after 2013.</p>	N 0472	Correction of cited deficiency: Agency Quality binder is update to contain all quality assurance and performance improvement results for 2013,2014 and 2015. Prevention of deficiency from occurring in the future: Quality Assurance and Performance	07/07/2015

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	<p>Findings</p> <p>1. Interview on 6/8/15 at 3:30 PM, employee A, alternate nursing director, indicated all the governing body meeting minutes were provided during this survey and they included the Quality Meeting minutes.</p> <p>2. Agency document titled "Vital Home & Healthcare, Inc. Synopsis 3rd Quarter Clinical Record Review Quality Meeting 11-21-13 INDIANA" dated 11/21/13 was the most recent Quality Meeting minutes provided by employee A, alternate nursing director. The minutes failed to evidence an ongoing quality assurance program had been implemented in the last year.</p> <p>3. Agency policy titled "Administrator" dated 11/09/00, revised 11-11-00 and 11-11-05, states, "1.0 PURPOSES 3.6.2 Participates in the preparation, annual review and update of the overall plan ... 3.6.3 Implements performance improvement priorities. "</p> <p>4. Agency policy titled "Governing Body" dated 11/09/00 states, "1.0 PURPOSES 1.1 Define and describe an entity that serves as the governing body of Vital Home & Healthcare, Inc. ... 3.2.5 Understanding and adopting an approach</p>		<p>improvement tracking and trending will be maintained electronically and hard copy placed in agency manuals for reference as needed.</p> <p>Responsible Person: Administrator/ Performance Improvement Manager Agency monitoring: Develop tracking log to be placed in QAPI manual for documentation of updating which will be monitored on a quarterly basis. On going monitoring to maintain 100% threshold for compliance</p>				

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	<p>for performance improvement ... 3.7.1 Meets at least once a year with the committee, agency staff and other individuals to assess and evaluate the agency's program, policies, administrative practices and/or goals and objectives ... 3.7.5 Requires an overall evaluation of the agency's total program at least once a year ... f) Keep minutes of all meetings ... 3.9 The governing body maintains documentation."</p> <p>5. Agency policy titled "Quality Assessment and Performance Improvement" dated 11/09/00 states, "1.0 PURPOSES ... 3.1. The governing body and administration ... 3.1.4 Assumes responsibility for the quality assessment and performance improvement program."</p>						