

Milwaukee County Behavioral Health Division

To: Héctor Colón
From: Kathleen Eilers & Jim Kubicek
Date: 6/3/2013
Re: BHD Plans of Correction

Please see below for information regarding the

acute and central unit Statements of Deficiency (SOD) and the Plans of Correction (POC).

The acute survey was completed on 4-25-13; the final version of the SOD was received on 5-16-13. The POC was submitted on 5-24-13, we have not heard back from the Wisconsin Department of Health if the plan was approved as yet.

Key themes of the SOD were:

1. A cafe that primarily served employees was not a licensed restaurant; it was surveyed under the Hospital regulations because it was within the confines of the building. This was the first time the Cafe had been inspected by the Acute surveyors and it did not meet Hospital standards. The Cafe had been run previously as a job training site but, however the vendor had to vacate the Cafe because of lack of funding. An alternative vendor then assumed operation of the Cafe. The Cafe closed effective April 25, 2013.
 - If a new vendor should provide food service from this area, the hospital will ensure that the foodservice operator adheres to all state laws and local ordinances regarding food safety and sanitation and licensing applicable to the hospital.
 - If a new vendor should provide food service for this area, the hospital will ensure that the vendor maintains all documentation and licenses required to operate in the facility. The vendor will be subject to inspections by the facility as well as the Wauwatosa Public Health Department.
2. Infection control citations, related to dust and cleanliness and expired or undated supplies.
 - To minimize the risk of nosocomial infections and maintain a sanitary environment the Infection Control Department will develop a policy for MCBHD that will create

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clear lines of accountability for the cleanliness of the environment, equipment and furniture. It will define standards of cleanliness and establish additional department monitoring guidelines.

- **A plan for specific cleaning responsibilities and dates by which all cleaning should be completed has been established.**

3. Sign, dating and timing medical record entries.

- **The Interim Director of Nursing will ensure that Nursing entries in the medical record are complete, signed, timed and authenticated. RN's were retrained regarding the need to ensure that all entries in the medical record are complete, signed, timed and dated.**
- **Beginning 6/4/13, weekly audits of the medical records on the inpatient units will be conducted to monitor compliance related to completion, signing, dating and timing of entries until the 90% threshold is met.**
- **The acute hospital is also implementing an electronic medical record in June 2013. The electronic record will provide additional enhancements to ensure medical record documentation is electronically, signed, timed, and dated and authenticated.**

4. Food storage and sanitation.

- **The foodservice operation will be audited monthly by hospital dietetic personnel and bi-annually by hospital infection control personnel to ensure that all food safety, sanitation and infection control standards are met.**

5. Absence of call lights on the Children's Unit.

- **The facility will provide a reliable nurse call system. BHD will install a working call system.**
- **Until the nurse call system is operational, several mechanisms are in place to monitor patients in bedrooms, bathrooms and high risk treatment areas from which individuals may need to summon assistance.**

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6. Various environmental issues that required maintenance repairs.
 - **The hospital will ensure that the hospital's buildings will be maintained so that they are functional for diagnosis and treatment and for the delivery of hospital services appropriate to the needs of the community and with the due regard for protecting the health and safety of the patients.**
 - **Several maintenance projects are underway to meet safety and sanitation requirements.**

The central survey began 5-1-13 and was completed on 5-9-13, we received the SOD on 5-22-13 the Plan of Correction was due 06-03-2013. Attached are some highlights of the plan that was submitted.

Key themes of the SOD are:

1. A resident who was involved in several incidents of threatening and violent behavior. The resident was then moved to the Acute unit on 4-22-13. This resident has been involved in many episodes of aggression and threatening behavior throughout her time on Central and her symptoms make her a very difficult individual to safely manage on a Nursing Home unit.
2. There were episodes of verbal/ physical aggression that did not result in care plan revision.
3. There were episodes of verbal/ physical aggression that were not investigated sufficiently, reports were filed with the State but did not include witness statements.
4. There were episodes of verbal threats that were not reported to the state.

Several steps are being taken to address and correct all of the above issues. Including, but not limited to:

- **As clients are being discharged, single room status is being maintained to avoid roommate conflicts.**
- **Additional occupational therapy staff is being added to provide more therapeutic programming off the unit. This will decrease the density of the unit and thereby the propensity for altercations.**
- **Additional therapeutic programs have been added during nights and weekends.**

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- **Any resident inflicting injury to another resident is immediately removed from the unit and transferred to a facility more appropriate for their needs (i.e. Acute Care)**
- **A special Incident and Investigation Review Team has been established. It is comprised of clinicians and the administrator to ensure that treatment plans are updated in a timely manner. It also addresses the psycho-social and behavioral needs of the residents. The team meets each business day.**

- **The Incident and Investigation Review Team also meets to ensure that any investigations of mistreatment towards residents are conducted promptly as well as thoroughly and reported to the state authorities.**
- **Administration to assess milieu of facility units with multiple rounds per shift.**