



DEPARTMENT OF HEALTH
HEALTH REGULATION ADMINISTRATION
INTERMEDIATE CARE FACILITIES DIVISION

Home Care Agencies
Title 22 DCMR 39

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION

Name of Health Care Agency: Right At Home DC	Street Address, City, State, ZIP Code: 1818 New York Ave. N.E. Washington, D.C. 20002	Survey Date: 01/15/2009 Follow-up Dates(s):
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Regulation Citation	Statement of Deficiencies	Ref. No.	Plan of Correction	Completion Date
3903.2 (C1)	<p>An initial licensure survey was conducted at your agency on January 15, 2009. The following deficiencies were based on a review of your agency's records. A random sample of (10) records were reviewed from a census of sixty eight (68) employees. The findings of the survey were based on interviews, clinical and administrative record review.</p> <p style="text-align: center;">3903 GOVERNING BODY</p> <p>The governing body shall do the following:</p> <p>The evaluation shall include feedback from a representative sample consisting of either ten percent (10%) of total District of Columbia patients or forty (40) District of Columbia patients, whichever is less, regarding services provided to those patients. Based on record review and staff interview, the Health Care Agency (HCA) failed to obtain feedback from a</p>	Policy & Procedure manual 4.3	<p>A confidential client/family questionnaire will be mailed on initial admission to home care and on a quarterly basis. The feedback regarding services provided is compiled. Results are reviewed and issues are addressed as required by the Quality Improvement Program. All client records will be reviewed to ensure compliance with the requirement that feedback from a representative sample regarding services provided is met.</p>	1/29/09

Shelia West Norton
Name of Inspector(s)

1/15/09
Date Issued

Melanie Lanier
Facility Director/Designee

4/14/09
Date



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representative sample of the services provided to their patients. The finding includes:

Review of the agency's policies and procedures on January 15, 2009 revealed the agency failed to provide evidence that their evaluations included feedback from a representative sample regarding the services provided to those patients.

3903.2 (C2)

(2) The evaluation shall include a review of all complaints made or referred to the agency, including the nature of each complaint and the agency's response thereto. Based on record review and staff interview, the Health Care Agency (HCA) failed to include a review of any complaints made to their agency.

The finding includes:

Review of the records on January 15, 2009, revealed that the agency failed to provide evidence in their quarterly minutes that the complaints referred to the agency had been reviewed or addressed at the time of the survey.

3907

PERSONNEL

3907.2 (d)

Each home care agency shall maintain accurate personnel records, which shall include the following information:

Documentation of current CPR certification if required;

10.1- 10.2

A "complaint log" shall be maintained by Right At Home (RAH) of all complaints made or referred to the agency, including the nature of each complaint and the agency's response. Evidence of complaints made to the agency that have been reviewed and addressed will also be included in quarterly minutes.

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10.1- 10.7

RAH will review all personnel records to determine which staff are not in compliance with the current CPR certification requirement. RAH will notify staff in writing and by phone. RAH will offer CPR classes to staff in order to promote compliance.

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Based on record review, the HCA failed to ensure that six out of ten staff had secured a current CPR certification. (Staff #3,#4, #5, #8, #9, and #11)

The findings include:

Review of the personnel records presented on January 15, 2009, revealed six out of the ten staff did not have a current CPR certification on file.

3907.2 (e)

(e) Health certification as required by section 3907.6;

Based on record review, the HCA failed to ensure that six out of ten staff had secured current health certificates for (Staff #2, #3, #4, #6, #7, #8, #9, #10, and #11)

The findings include:

Review of the personnel records presented on January 15, 2009, revealed nine out of the ten staff did not have a current health certificate on file.

3907.2 (f)

(f) Verification of previous employment;

Based on record review, the HCA failed to ensure the verification of previous employment for one of the ten staff for (Staff #4).

The findings include:

Review of the personnel records presented on January 15,

(a)

RAT will review all personnel records to determine which staff are not in compliance with the health certification requirement. RAT will notify staff in writing and by phone. Resources will be provided for those staff who do not have primary care physicians. All new staff will be required to have a health certification completed within 6 months of the hire date. Current staff will not be able to work with a client if this requirement is 30 days past expiration.

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(e)

RAT will review all personnel records to determine which staff are not in compliance with the verification of previous employment requirement. RAT will notify staff in writing and by phone if additional contacts of previous employers are needed. RAT will perform the verification of previous employment. Personnel will not be able to complete final orientation until this requirement is met.

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<p>3907.2 (g)</p>	<p>2009, revealed the HCA failed to secure the review of reference checks for one out of the ten staff records reviewed.</p> <p>(g) Documentation of reference checks; Based on record review, the HCA failed to secure reference checks for three of the ten currently employed staff (Staff #2, #8, and #9). The findings include:</p>	<p>2e.4 RAtt will review all personnel records to determine which staff are not in compliance with documentation of reference checks. RAtt will notify staff in writing and by phone if additional references are needed. RAtt will perform the reference check. Personnel will not be able to complete final orientation until this requirement is met.</p>	<p>2/27/09</p>
<p>3907.2 (h)</p>	<p>Review of the personnel records presented on January 15, 2009, revealed the HCA failed to secure the review of reference checks for three out of the ten staff records reviewed.</p> <p>(h) Copies of completed annual evaluations; Based on record review, the HCA failed to secure annual evaluations for five of the ten currently employed staff (Staff #4, #5, #6, and #9). The findings include:</p>	<p>2e.6 RAtt will review all personnel records to determine which staff need Annual Evaluations completed. RAtt will ensure that all personnel have up to date annual evaluations by completing evaluations for those staff not in compliance with the requirement. The due date for future evaluations will be entered into RAtt employee database which will provide notification for future annual evaluations that need to be completed.</p>	<p>3/6/09</p>
<p>3907.2 (i)</p>	<p>Review of the personnel records presented on January 15, 2009, revealed the HCA failed to secure completed evaluations for four out of the ten staff records reviewed.</p> <p>(i) Documentation of any required criminal background check; Based on record review, the HCA failed to secure any required background checks for two of the ten currently employed staff (Staff #2, and #7). The findings include:</p>	<p>2e.4 RAtt will review all personnel records to determine which staff are not in compliance with the criminal background check requirement. RAtt will notify staff in writing and by phone. Staff will be required to obtain a police clearance. RAtt will produce a background check utilizing an agency that provides this service. Personnel will not be able to complete final orientation until criminal background check is obtained.</p>	<p>2/27/09</p>



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3907.2 (k)

Review of the personnel records presented on January 15, 2009, revealed the HCA failed to secure any required background checks for two of the ten currently employee records two out of the ten staff records reviewed. A position description; Based on record review, the HCA failed to secure position descriptions for four of the ten currently employed staff (Staff #3, #8, #9, and #11).

The finding include:

Review of the personnel records presented on January 15, 2009, revealed the HCA failed to secure position descriptions for four out of the ten staff records reviewed.

3907.2 (m)

Documentation of acceptance or declination of the Hepatitis Vaccine;

Based on record review, the HCA failed to secure documentation of acceptance or declination of Hepatitis Vaccine for one of the ten currently employed staff (Staff #1).

The finding include:

Review of the personnel records presented on January 15, 2009, revealed the HCA failed to secure documentation of acceptance or declination of Hepatitis Vaccine for one out

7.3

RAtt will review all personnel records to determine a position description is present and signed. RAtt will notify those staff not in compliance with the requirement in writing and by phone. RAtt will ensure that all staff meet this requirement. A signed position description will be completed by all staff in final orientation.

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6.4

RAtt will review all personnel records to determine documentation of acceptance or declination of the Hepatitis vaccine is present. RAtt will notify those staff not in compliance with the requirement in writing and by phone. RAtt will ensure all staff meet this requirement. A signed acceptance or declination of the Hepatitis Vaccine will be completed by all staff in final orientation.

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3907.6

of the ten staff records reviewed. At the time of initial employment of each employee, the home care agency shall verify that the employee, within the six months immediately preceding the date of hire, has been screened for and is free of communicable disease. Based on record review and staff interview, the Health Care Agency (HCA) failed to verify that three of the ten staff (Staff #3, #4, and #7) was screened for and was free of any communicable disease.

The findings include:

Review of the personnel records presented on January 15, 2009, revealed the HCA failed to to verify staff was screened for and was free of any communicable disease for four out of the ten staff records reviewed.

3907.7

Each employee shall be screened for communicable disease annually, according to the guidelines issued by the federal Centers for Disease Control, and shall be certified free of communicable disease.

Based on record review and staff interview, the HCA failed to verify that five of the ten staff (Staff #2, #3, #5, #6, and #7) had been screened for communicable disease annually.

The findings include:

Review of the personnel records presented on January 15, 2009, revealed the HCA failed to to verify staff had been screened annually for communicable disease for five out of

2/4

All personnel records will be reviewed to determine that verification that of documentation that employee is free of communicable disease within 6 months of hire is present. RAtt will notify those staff not in compliance with this requirement in writing and by phone. RAtt will ensure that all staff meet this requirement. Personnel will not be able to complete final orientation until documentation is presented stating that employee is free of communicable disease within the 6 months immediately preceding the date of hire.

3/12/09

2/4

All personnel records will be reviewed to determine that an annual screening of communicable diseases has been obtained. RAtt will notify those staff not in compliance with the requirement by phone and in writing. RAtt will ensure that all staff meet the requirement. Personnel will not be allowed to work with clients until documentation is presented stating that employee has had an annual screening for communicable disease.

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the ten staff records reviewed.

3915

HOME HEALTH AND PERSONAL CARE AIDE SERVICES

3915.8

Home health or personal care service activities that are performed by an aide shall be explained to the patient by the registered nurse or other health professional, as authorized by a physician and in accordance with the plan of care.

Based on interview and record review, the agency failed to ensure services were explained to each of their patients. The findings include:

Interview and record review on January 15, 2009, at 11:03 AM revealed the agency failed to ensure personal care services were explained by a registered nurse to patients #1, #2, #3, #4, #5 and #6.

3915.9

Each home care agency shall define the duties of home health aides and personal care aides.

Based on interview and record review, the agency failed to ensure that duties were defined for each ha Aide or Personal Care Aides..

The findings include:

Interview and record review on January 15, 2009, revealed

policy change

12.1- 12.2

RAtt will review all client records to ensure compliance with the requirement that personal care service activities that are performed by an aide shall be explained to the client by the RN or other health professional. Verification that RAtt is compliant with this requirement is accepted once client signs plan of care and service agreement. This policy change shall be effective immediately, note policy change in policy & procedure Manual Care Plan section.

2/27/09

7.3

RAtt will define the duties of Home Health Aides and Personal Care Aides. Agency will provide documentation of the duties of the position along with a list of tasks that are unacceptable for the aides to perform. This documentation is located in the policies & procedures Manual Job Description section.

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the agency failed to provide documented evidence that duties were defined for HA aides or Personal Care Aides.