

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: 15G216	X2) MULTIPLE CONSTRUCTION A. BUILDING 00 B. WING _____		X3) DATE SURVEY COMPLETED 08/27/2013
NAME OF PROVIDER OR SUPPLIER HILLCROFT SERVICES INC			STREET ADDRESS, CITY, STATE, ZIP CODE 423 E BERKLEY AVE MUNCIE, IN 47303		
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W000000	<p>This visit was for a fundamental annual recertification and state licensure survey.</p> <p>Survey Dates: August 19, 20, 21, 22, 23, 26 and 27, 2013.</p> <p>Surveyor: Kathy Wanner, QIDP.</p> <p>Facility Number: 000742 Provider Number: 15G216 AIM Number: 100248890</p> <p>These federal deficiencies also reflect state findings in accordance with 460 IAC 9. Quality Review completed 9/6/13 by Ruth Shackelford, QIDP.</p>	W000000			

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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W000263	<p>483.440(f)(3)(ii) PROGRAM MONITORING & CHANGE The committee should insure that these programs are conducted only with the written informed consent of the client, parents (if the client is a minor) or legal guardian.</p> <p>Based on record review and interview, the facility failed to insure Behavior Support Plans (BSPs) which included the use of restrictive interventions were conducted only with the prior written informed consent of the client and/or guardian for 2 of 3 sampled clients who had BSPs (clients #1 and #2).</p> <p>Findings include:</p> <p>Client #1's record was reviewed on 8/20/13 at 11:45 A.M. Client #1's Individual Support Plan (ISP) dated 6/6/13 indicated she had a guardian to assist her. Client #1's record indicated she had a Behavior Support Plan (BSP) dated 2/28/13 which included the following restrictive interventions: 1. Psychotropic Medications: Ativan (anti-anxiety), Seroquel (anti-psychotic), Trazodone (anti-depressant/sleeper) and Geodon (anti-psychotic). 2. Bells on doors, 3. Removing items which could be thrown, 4. Locked Chemicals. Client #1's BSP did not include documentation indicating client #1 and her guardian had given written informed consent prior to the</p>	W000263	<p>All Behavioral Specialists working with Berkeley Avenue individuals will be trained by the Vice-President of Therapy Services on 9/20/13. This training will include the review of appropriate procedure for written informed consent for Behavior Plans, which include use of restrictive interventions. Through review of the behavior support plans including those already surveyed, three plans were identified as needing signature of the individual or Guardian. All Behavior Plans requiring correction will be updated by the Behavioral Specialist. They will obtain the signature of the individual or Guardian and HRC by 9/26/13. Beginning immediately, all Behavior Plans will be submitted by the Behavioral Specialist to the Vice-President of Therapy Services for review prior to processing for implementation. The QIDP reviews behavior plans to help coordinate training, implementation, and insure that plans meet necessary standards. The QIDP monitors implementation through behavior tracking results monthly.</p>	09/26/2013			

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	<p>Human Rights Committee's (HRC's) approval on 3/4/13.</p> <p>Client #2's record was reviewed on 8/20/13 at 12:57 P.M. Client #2's ISP indicated he had a guardian to assist him. Client #2's record indicated he had a BSP dated 2/28/13 which included the following restrictive interventions: 1. Ignoring Behavior, 2. Removal of hoarded items from his room when (client #2) (is) not present. 3. Bells on doors, 4. Locked Chemicals. Client #2's BSP did not include documentation indicating client #2 and his guardian had given written informed consent prior to the Human Rights Committee's (HRC's) approval on 3/4/13.</p> <p>An interview was conducted with the Program Director (PD) on 8/20/13 at 3:10 P.M. The PD stated, "We have been unable to locate the signature pages with the client's and guardian's signatures." The PD stated, "It is our facility policy to always gain consent from the client and guardian prior to submitting the plans to the HRC."</p> <p>An interview was conducted with the Vice President of Behavior Management Services (VP-BMS) on 8/20/13 the VP-BMS stated, "We can't locate the signature pages, a staff left and we have</p>			

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	not been able to find some paperwork." 9-3-4(a)				

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W000312	<p>483.450(e)(2) DRUG USAGE Drugs used for control of inappropriate behavior must be used only as an integral part of the client's individual program plan that is directed specifically towards the reduction of and eventual elimination of the behaviors for which the drugs are employed. Based on record review and interview, the facility failed to include specific criteria as part of a plan of reduction for each medication used for the management or elimination of behaviors and/or symptoms of diagnoses as indicated in 1 of 3 sampled clients (client #3) who was prescribed medications for management of behaviors.</p> <p>Findings include:</p> <p>Client #3's record was reviewed on 8/20/13 at 1:27 P.M. Client #3's Physician's Orders (PO) dated for August 2013 indicated she was prescribed Abilify (anti-depressant) for mood disorder, Bupropion (anti-depressant) for mood/depression, Sertraline (anti-depressant) for depression and Trazodone (anti-depressant/sleeper) for depression/sleep. Client #3's Behavior Support Plan (BSP) dated 2/28/13 indicated she had the targeted behaviors of pill seeking, somatic complaints, lying, stealing, hoarding, eating excessive amounts of food, and excess phone usage.</p>	W000312	All Behavioral Specialists working with Berkeley Avenue individuals will be trained by the Vice-President of Therapy Services on 9/20/13. This training will include the proper process of including specific criteria for plan reduction for each individual medication used for behavioral management/elimination of behaviors or symptoms of diagnosis in the Behavior Plan. Through review of the behavior support plans including those already surveyed, four plans were identified as needing specific criteria as part of a plan of reduction for each medication used for the management or elimination of behaviors. All Behavior Plans requiring correction will be updated by the Behavioral Specialist. They will obtain the signature of the individual or Guardian and HRC by 9/26/13. Beginning immediately, all Behavior Plans will be submitted by the Behavioral Specialist to the Vice-President of Therapy Services for review prior to processing for implementation. The QIDP reviews behavior plans to help coordinate training,	09/26/2013			

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	<p>Client #3's BSP indicated "When the above data (behavior data) is shown to been (sic) reduced by 50% (fifty percent) for three consecutive months...the psychiatric provider will then assess if the correlating medication should be reduced or withdrawn." Client #3's BSP included a plan to decrease her targeted behaviors but did not indicate what specific targeted behaviors correlated to the use of Abilify, Bupropion, Sertraline and Trazodone or what specific behavior criteria needed to be achieved for Abilify, Bupropion, Sertraline and Trazodone to be considered for possible reductions. Client #3's BSP did not indicate how each of the medication's effectiveness could be determined.</p> <p>An interview was conducted with a facility Behavior Consultant (BC) on 8/22/13 at 2:50 P.M. The BC stated, "They do have a plan of reduction for each behavior, but not a specific plan of reduction for medication. Mostly we would talk with the prescribing physician and reduce the appropriate medication for the change in behavior which has occurred."</p> <p>An interview was conducted with the Vice President Of Behavior Management Services (VP-BMS) on 8/22/13 at 2:57 P.M. The VP-BMS stated, "I think it</p>		<p>implementation, and insure that plans meet necessary standards. The QIDP monitors implementation through behavior tracking results monthly.</p>				

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	would be beneficial to have the plan of reductions written that way to decrease the possibility of unneeded medications." 9-3-5(a)			