

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  15G385		X2) MULTIPLE CONSTRUCTION A. BUILDING 00 B. WING _____		X3) DATE SURVEY COMPLETED 03/14/2014	
NAME OF PROVIDER OR SUPPLIER  TRADEWINDS SERVICES INC				STREET ADDRESS, CITY, STATE, ZIP CODE 12046 FORREST DR ST JOHN, IN 46373			
(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			
W000000	<p>This visit was for the investigation of complaint #IN00144005.</p> <p>COMPLAINT #IN00144005: SUBSTANTIATED, federal and state deficiencies related to the allegation are cited at W104, W140, W149, W153 and W189.</p> <p>Dates of Survey: March 13 and 14, 2014.</p> <p>Surveyor: Christine Colon, QIDP.</p> <p>Facility Number: 000899 Provider Number: 15G385 AIM Number: 100249270</p> <p>These federal deficiencies also reflect state findings in accordance with 460 IAC 9.</p> <p>Quality review completed April 4, 2014 by Dotty Walton, 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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W000104	<p>483.410(a)(1) GOVERNING BODY The governing body must exercise general policy, budget, and operating direction over the facility. Based on observation, record review and interview, the governing body failed for 4 of 4 sampled clients (A, B, C, and D), and 4 additional clients (E, F, G and H), to exercise general operating direction of the facility in a manner to provide oversight to ensure their Abuse and Neglect policy and Policies and Procedures on the Management of Individual Clients' funds were implemented.</p> <p>Findings include:</p> <p>1. Please refer to W140: The governing body failed for 4 of 4 sampled clients (A, B, C and D) and 4 additional clients (E, F, G and H), for whom the facility managed their personal funds accounts, to ensure accurate accounting systems for each client's personal petty cash funds kept at the group home were maintained.</p> <p>2. Please refer to W149: The governing body failed for 3 of 4 sampled clients (B, C and D) and 4 additional clients (E, F, G and H), to implement written policy and procedures to prevent alleged abuse and neglect in regards to client to client aggression and financial exploitation.</p>	W000104	<p>TradeWinds has a policy on the Management of Individual Funds. "It is TradeWinds policy to manage the funds of each individual for whom we are the Representative Payee in a way that ensures the funds are utilized to meet the individual's living expenses and daily needs, respect their rights to choice and to prevent any financial exploitation. (Please see attached Policies and Procedures on the Management of Individuals Funds).</p> <p>In addition, TradeWinds also has a Procedure in place for ongoing group home consumer bank record keeping. (Please see attached procedure for ongoing group home consumer bank record keeping)</p> <p>On 2/10/2014, staffs were trained on: Cash on hand and shift accounting for cash on hand. (Please see attached training documents)</p> <p>Please see attached documents that all staffs were retrained on the Monthly Financial Statement and Petty Cash Accountability Sheet. The forms were developed and implemented to track the finances of each consumer. At the beginning and end of each shift, 2 staff members will count and account for</p>	04/13/2014			

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	<p>3. Please refer to W153: The governing body failed for 3 of 4 sampled clients (B, C, and D) and 4 additional clients (E, F, G and H), to report missing monies immediately to the administrator and to the Bureau of Developmental Disabilities Services (BDDS) in accordance with state law.</p> <p>This federal tag relates to complaint #IN00144005.</p> <p>9-3-1(a)</p>		<p>the consumers' petty cash in the home. One of the staff members will be from the shift that is leaving (signing out) and the other staff member will be from the oncoming shift (signing in). Both staff members will initial the cash on hand account form and document the counted amount of petty cash available per each consumer. If there are any missing funds, it is the responsibility of the staff member to immediately contact the house manager and the QDDP. (Please see attached Monthly Financial Statement and Petty Cash Accountability Forms)</p> <p>The group home manager is responsible for monitoring and ensuring that the staffs are following the rights of the consumers. In addition, the QDDP will observe during unannounced visits that the staffs are following the rights of the consumers. It is the policy of TradeWinds Service to ensure that all clients have a safe environment free of aggression, exploitation, abuse, neglect and mistreatment. It is also the policy of TradeWinds to ensure the health, welfare and rights of the individuals we serve.</p> <p>On 4/11/14, the QDDPs and Residential Coordinator was trained on the finances for the consumers, which include: the Procedures for ongoing group home consumer bank record keeping,</p>		

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			<p>Monthly Financial Statement and PettyCash Accountability Forms. (Please see attached training documents)By May 31,2014, all House Managers will be re-trained on the finances for the consumersalso, which includes: the Procedures for ongoing group home consumer bankrecord keeping, Monthly Financial Statement and Petty Cash AccountabilityForms.</p> <p>The House Manager for the Forest Group Home wasimmediately removed from the schedule pending investigation. After a thoroughinvestigation, the House Manager was terminated from TradeWinds Services,effective, Friday, March 21, 2014.</p> <p>The Policies and Procedures on the Management ofIndividuals Funds, Procedures for ongoing group home consumer bank recordkeeping, Monthly Financial Statement and Petty Cash Accountability Forms havebeen developed and implemented to track the finances of each consumer. Anyissues regarding consumer accounts holding balances that are "over resources"will be brought to the attention of the QDDP immediately. A copy of the monthlyledger is to be submitted to the QDDP by the 3rd working day of themonth. The ledger is to be reconciled by the QDDP with the bank statement andreviewed for unusual</p>	

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			<p>transactions. Staff members must be prepared to provide explanations for any transactions they signed off on. A copy is to be sent to the Program Director. All new accounts will be pre-approved by the QDDP and established accounting to TradeWinds guidelines. These policies and procedures in place will provide oversight to ensure the Abuse, Neglect and Exploitation policy and policies and procedures on the Management of Individual Clients' funds are being implemented. The policies and procedures in place will also ensure accurate accounting systems for each consumer personal petty cash funds kept at the Residential Group Home maintained.</p> <p>If there are any missing funds, it is the responsibility of the staff member to immediately contact the house manager and the QDDP. (Please see attached Monthly Financial Statement and Petty Cash Accountability Forms) For all allegations of Abuse, Neglect, Exploitation, Mistreatment and Injuries of unknown origin, the investigation will start within 24 hours of the alleged incident. When there is an allegation of Abuse, Neglect, Exploitation, Mistreatment and Injuries of unknown origin the staff person(s) involved will be removed immediately from the schedule pending outcome of the investigation. The staff person(s)</p>	

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			involved is responsible for completing an internal incident report and notifying all necessary person(s), such as: House Manager, QDDP and Residential Nurse (if medical attention is needed). The QDDP must be notified as soon as the incident is under control and there is no further danger to either client(s) involved. The QDDP is responsible for making all necessary incident reports to the Bureau of Developmental Disabilities (BDDS) within the guidelines (within 24 hours of incident).	

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W000140	<p>483.420(b)(1)(i) CLIENT FINANCES</p> <p>The facility must establish and maintain a system that assures a full and complete accounting of clients' personal funds entrusted to the facility on behalf of clients. Based upon record review and interview, the facility failed to maintain an accurate accounting system for 4 of 4 sampled clients (A, B, C, and D), and 4 additional clients (E, F, G and H), for whom the facility managed their personal funds;</p> <p>Findings include:</p> <p>A review of the facility's Bureau of Developmental Disabilities Services (BDDS) reports and investigations was conducted on 3/13/14 at 11:15 A.M. and indicated:</p> <p>-BDDS report dated 1/31/14 indicated: "[Client B], [client C], [client D], [client E], [client F], [client G] and [client H] are all residents of the [Group Home name]. On 1/31/14 at approximately 9:00 A.M., the QDDP (Qualified Developmental Disabilities Professional) was informed by staff that 7 of 8 consumers that live in the [Group Home name] had \$10.00 missing from their petty cash. Additionally, staff informed the QDDP (Qualified Developmental Disabilities Professional), that on Monday (January 27th), it was reported to the house</p>	W000140	<p>TradeWinds has a policy on the Management of Individual Funds. "It is TradeWinds policy to manage the funds of each individual for whom we are the Representative Payee in a way that ensures the funds are utilized to meet the individual's living expenses and daily needs, respect their rights to choice and to prevent any financial exploitation. (Please see attached Policies and Procedures on the Management of Individuals Funds).</p> <p>In addition, TradeWinds also has a Procedure in place for ongoing group home consumer bank record keeping. (Please see attached procedure for ongoing group home consumer bank record keeping)</p> <p>On 2/10/2014, staffs were trained on: Cash on hand and shift accounting for cash on hand. (Please see attached training documents)</p> <p>Please see attached documents that all staffs were retrained on the Monthly Financial Statement and Petty Cash Accountability Sheet. The forms were developed and implemented to track the finances of each consumer. At the beginning and end of each shift, 2 staff</p>	04/13/2014	

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	<p>manager that \$5.00 was missing from [client F's] petty cash envelope. This was never reported to the QDDP until 1/31/14, the house manager admitted that he just replaced the \$5.00 with his own money. The incident is currently under investigation. The House Manager has been suspended due to failing to report and for not having correct measures in place for staff to sign on/off to account for the consumers' petty cash at the beginning and end of their shift, which he was previously trained to do. On 1/31/14 all of he consumers stolen money was replaced by [Facility name] in the amount of \$10.00 for each consumer and placed in their petty cash envelope. Additionally, the QDDP has placed the proper documentation in the [Group Home name] that requires staff to count and account for the consumers' petty cash at the beginning and end of their shifts. Staff began using this documentation during the 3-11 shift on 1/31/14."</p> <p>An interview with the Qualified Intellectual Disabilities Professional (QIDP) was conducted on 3/14/14 at 10:25 A.M. The QIDP indicated the facility managed clients A, B, C, D, E, F, G and H's finances and further indicated the facility was to keep an accurate account of their finances at all times. The QIDP indicated each client should have a</p>		<p>members will count and account for the consumers' petty cash in the home. One of the staff members will be from the shift that is leaving (signing out) and the other staff member will be from the oncoming shift (signing in). Both staff members will initial the cash on hand account form and document the counted amount of petty cash available per each consumer. If there are any missing funds, it is the responsibility of the staff member to immediately contact the house manager and the QDDP. (Please see attached Monthly Financial Statement and Petty Cash Accountability Forms)</p> <p>The group home manager is responsible for monitoring and ensuring that the staffs are following the rights of the consumers. In addition, the QDDP will observe during unannounced visits that the staffs are following the rights of the consumers. It is the policy of TradeWinds Service to ensure that all clients have a safe environment free of aggression, exploitation, abuse, neglect and mistreatment. It is also the policy of TradeWinds to ensure the health, welfare and rights of the individuals we serve.</p> <p>On 4/11/14, the QDDPs and Residential Coordinator was trained on the finances for the consumers, which include: the Procedures for ongoing group home</p>				

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	<p>financial ledger which should reflect the clients' expenditures and balances to ensure they kept an accurate accounting of their petty cash funds by staff at the group home. The QIDP further indicated the group home manager failed to ensure there were ledgers for clients A, B, C, D, E, F, G and H at the group home and failed to ensure all staff at the group home were trained to keep an accurate accounting system of the clients' personal funds.</p> <p>This federal tag relates to complaint #IN00144005.</p> <p>9-3-2(a)</p>		<p>consumer bank record keeping, Monthly Financial Statement and PettyCash Accountability Forms. (Please see attached training documents) By May 31,2014, all House Managers will be re-trained on the finances for the consumersalso, which includes: the Procedures for ongoing group home consumer bankrecord keeping, Monthly Financial Statement and Petty Cash AccountabilityForms.</p> <p>The House Manager for the Forest Group Home wasimmediately removed from the schedule pending investigation. After a thoroughinvestigation, the House Manager was terminated from TradeWinds Services,effective, Friday, March 21, 2014.</p>		

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W000149	<p>483.420(d)(1) STAFF TREATMENT OF CLIENTS The facility must develop and implement written policies and procedures that prohibit mistreatment, neglect or abuse of the client. Based on record review and interview, for 4 of 4 sampled clients (A, B, C and D), and 4 additional clients (E, F, G and H), the facility neglected to implement its "Policy on Abuse and Neglect, Exploitation, Mistreatment, Violation of an Individuals Rights, and Injuries of an unknown Origin" in regards to client to client aggression and its "Policies and Procedure on the Management of Individual Funds" by not ensuring staff did not financially exploit the clients.</p> <p>Findings include:</p> <p>A review of the facility's Bureau of Developmental Disabilities Services (BDDS) reports and investigations was conducted on 3/13/14 at 11:15 A.M. and indicated:</p> <p>1. Investigation record dated 1/15/14 indicated an incident of client to client aggression involving clients D and E in which client E received a 1 inch superficial scratch between his eyebrows, a 1.5 inch scratch on the right side of his nose and a 2 inch light purple bruise towards the right side of his neck.</p>	W000149	<p>TradeWinds has a policy on Abuse, Neglect, Exploitation, Mistreatment, and Protection of an Individuals' Rights and Injury of an unknown origin. The Policy Statement states:</p> <p>"Violating an Individuals Rights, Abuse and or neglect or any mistreatment of any consumer who participates in a TradeWinds Services, Inc., program is strictly prohibited and will result in severe disciplinary action up to and include discharge from employment and may further result in criminal prosecution. All allegations of violating an Individuals rights or abuse and neglect of consumers served and certain other incidents defined in this policy are to be reported and investigated in prompt and procedurally correct manner."</p> <p>(Please see attached Policies and Procedures on Abuse, Neglect, Exploitation, Mistreatment, and Protection of an Individuals' Rights and Injuries of an Unknown Origin)</p> <p>TradeWinds also has a policy on the Management of Individual Funds. "It is TradeWinds policy to manage the funds of each individual for whom we are the Representative Payee in a way that ensures the funds are</p>	04/13/2014			

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	<p>-BDDS report dated 1/17/14 indicated: "[Day program client] could not find her coat. She became agitated and kicked [client C] who was sitting in the chair next to her. Staff inspected [client C] for any injuries."</p> <p>-BDDS report dated 2/24/14 indicated: "[Client F] was sitting at the table participating in an activity, when for no apparent reason [Day program client] got up from his chair and hit [client F] in the middle of his back with his hand."</p> <p>2. BDDS report dated 1/31/14 indicated: "[Client B], [client C], [client D], [client E], [client F], [client G] and [client H] are all residents of the [Group Home name]. On 1/31/14 at approximately 9:00 A.M., the QDDP (Qualified Developmental Disabilities Professional) was informed by staff that 7 of 8 consumers that live in the [Group Home name] had \$10.00 missing from their petty cash. Additionally, staff informed the QDDP that on Monday (January 27th), it was reported to the house manager that \$5.00 was missing from [client F's] petty cash envelope. This was never reported to the QDDP until 1/31/14, the house manager admitted that he just replaced the \$5.00 with his own money. The incident is currently under investigation. The House Manager has been suspended due to</p>		<p>utilized to meet the individual's living expenses and daily needs, respect their rights to choice and to prevent any financial exploitation. (Please see attached Policies and Procedures on the Management of Individuals Funds).</p> <p>In addition, TradeWinds also has a Procedure in place for ongoing group home consumer bank record keeping. (Please see attached procedure for ongoing group home consumer bank record keeping)</p> <p>On 1/31/2014, staffs were trained on the followings: Activities in the home (active treatment), Behavior Data, Review of Fall plans, ISP training and etc... (Please see attached training documents)</p> <p>On 2/10/2014, staffs were trained on: Cash on hand and shift accounting for cash on hand. (Please see attached training documents)</p> <p>Please see attached documents that all staffs were retrained on the Monthly Financial Statement and Petty Cash Accountability Sheet. The forms were developed and implemented to track the finances of each consumer. At the beginning and end of each shift, 2 staff members will count and account for the consumers' petty cash in the home. One of the staff members will be from the shift that is leaving (signing out) and the other staff</p>		

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	<p>failing to report and for not having correct measures in place for staff to sign on/off to account for the consumers' petty cash at the beginning and end of their shift, which he was previously trained to do. On 1/31/14 all of he consumers stolen money was replaced by [Facility name] in the amount of \$10.00 for each consumer and placed in their petty cash envelope. Additionally, the QDDP has placed the proper documentation in the [Group Home name] that requires staff to count and account for the consumers' petty cash at the beginning and end of their shifts. Staff began using this documentation during the 3-11 shift on 1/31/14."</p> <p>A review of the facility's "Policy on Abuse, Neglect, Exploitation, Mistreatment, Violation of an Individual's Rights and Injuries of an unknown Origin" dated 3/10/09 was conducted at the facility's administrative office on 3/13/14 at 11:00 A.M. Review of the policy indicated: "To establish prompt, accurate and effective procedures and investigating of all allegations of abuse and neglect and any incident or crime as defined...All allegations of abuse and neglect of consumers served and certain other incidents defined in this policy are to be reported and investigated in prompt and procedurally correct</p>		<p>memberwill be from the oncoming shift (signing in). Both staff members will initialthe cash on hand account form and document the counted amount of petty cashavailable per each consumer. If there are any missing funds, it is theresponsibility of the staff member to immediately contact the house manager andthe QDDP. (Please see attached Monthly Financial Statement and Petty CashAccountability Forms)</p> <p>The group home manager is responsible for monitoring andensuring that the staffs are following the rights of the consumers. Inaddition, the QDDP will observe during unannounced visits that the staffs arefollowing the rights of the consumers. It is the policy of TradeWinds Servicesto ensure that all clients have a safe environment free of aggression,exploitation, abuse, neglect and mistreatment. It is also the policy ofTradeWinds to ensure the health, welfare and rights of the individuals wreserve.</p> <p>On 4/11/14, the QDDPs and Residential Coordinator was trainedon the finances for the consumers, which include: the Procedures for ongoinggroup home consumer bank record keeping, Monthly Financial Statement and PettyCash Accountability Forms. (Please see attached training documents)By May 31,2014, all</p>				

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	<p>manner...Accidents and other injuries not defined as abuse or neglect must still be documented on the incident report form and reviewed according to policy and applicable standards...It is mandatory that all personnel follow this policy. This includes: reporting incidents immediately upon becoming aware of them, completing all forms as required by this policy...Physical abuse: willful infliction of injury...Verbal abuse: Oral, written and or gestured language that includes disparaging and derogatory remarks toward consumers...Exploitation. Financial, any deliberate misplacement, exploitation, or wrongful temporary or permanent use of an individual's belongings or money."</p> <p>Review of the facility's "Policy and Procedures on the Management of Individuals Funds" no date noted, indicated: "It is Tradewinds policy to manage the funds of each individual for whom we are the Representative Payee in a way that ensures the funds are utilized to meet the Individual's living expenses and daily needs, respect their rights to choice, and prevent financial exploitation...The monthly ledger is to be submitted to the Director by the third working day of the month. The ledger is to be reconciled with the bank statement and reviewed for unusual transactions.</p>		<p>House Managers will be re-trained on the finances for the consumersalso, which includes: the Procedures for ongoing group home consumer bankrecord keeping, Monthly Financial Statement and Petty Cash AccountabilityForms.</p> <p>The House Manager for the Forest Group Home wasimmediately removed from the schedule pending investigation. After a thoroughinvestigation, the House Manager was terminated from TradeWinds Services,effective, Friday, March 21, 2014.</p>				

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	<p>Staff members should be prepared to provide explanations for any transactions they signed off on."</p> <p>An interview with the Qualified Intellectual Disabilities Professional (QIDP) was conducted on 3/14/14 at 11:40 A.M. The QIDP indicated it was discovered during her investigation that group home staff were not documenting on individual ledgers to account for clients A, B, C, D, E, F, G and H's personal funds. The QIDP further indicated the clients were missing funds and all clients were reimbursed for the missing monies. The QIDP further indicated the facility's policies should be followed at all times.</p> <p>This federal tag relates to complaint #IN00144005.</p> <p>9-3-2(a)</p>						

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W000153	<p>483.420(d)(2) STAFF TREATMENT OF CLIENTS The facility must ensure that all allegations of mistreatment, neglect or abuse, as well as injuries of unknown source, are reported immediately to the administrator or to other officials in accordance with State law through established procedures. Based on record review and interview, the facility failed for 3 of 4 sampled clients (B, C, and D), and 4 additional clients (E, F, G and H), to report an incident of financial exploitation immediately to the administrator and to the Bureau of Developmental Disabilities Services (BDDS) in accordance with state law.</p> <p>Findings include:</p> <p>A review of the facility's Bureau of Developmental Disabilities Services (BDDS) reports and investigations was conducted on 3/13/14 at 11:15 A.M. and indicated:</p> <p>-BDDS report dated 1/31/14 indicated: "[Client B], [client C], [client D], [client E], [client F], [client G] and [client H] are all residents of the [Group Home name]. On 1/31/14 at approximately 9:00 A.M., the QDDP (Qualified Developmental Disabilities Professional) was informed by staff that 7 of 8 consumers that live in the [Group Home name] had \$10.00</p>	W000153	<p>TradeWinds has a policy on Abuse, Neglect, Exploitation, Mistreatment, and Protection of an Individuals' Rights and Injury of an unknown origin. The Policy Statement states: "Violating an Individuals Rights, Abuse and or neglect or any mistreatment of any consumer who participates in a TradeWinds Services, Inc., program is strictly prohibited and will result in severe disciplinary action up to and include discharge from employment and may further result in criminal prosecution. All allegations of violating an Individuals rights or abuse and neglect of consumers served and certain other incidents defined in this policy are to be reported and investigated in prompt and procedurally correct manner." (Please see attached Policies and Procedures on Abuse, Neglect, Exploitation, Mistreatment, and Protection of an Individuals' Rights and Injuries of an Unknown Origin)</p> <p>TradeWinds also has a policy on the Management of Individual Funds. "It is TradeWinds policy to manage the</p>	04/13/2014	

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	<p>missing from their petty cash. Additionally, staff informed the QDDP that on Monday (January 27th), it was reported to the house manager that \$5.00 was missing from [client F's] petty cash envelope. This was never reported to the QDDP until 1/31/14, the house manager admitted that he just replaced the \$5.00 with his own money. The incident is currently under investigation. The House Manager has been suspended due to failing to report and for not having correct measures in place for staff to sign on/off to account for the consumers petty cash at the beginning and end of their shift, which he was previously trained to do. On 1/31/14 all of he consumers stolen money was replaced by [Facility name] in the amount of \$10.00 for each consumer and placed in their petty cash envelope. Additionally, the QDDP has placed the proper documentation in the [Group Home name] that requires staff to count and account for the consumers' petty cash at the beginning and end of their shifts. Staff began using this documentation during the 3-11 shift on 1/31/14."</p> <p>An interview with the Qualified Intellectual Disabilities Professional (QIDP) was conducted on 3/14/14 at 10:25 A.M. The QIDP indicated this incident was not immediately reported to the administrator or BDDS. The QIDP</p>		<p>funds of each individual for whom we are the Representative Payee in a way that ensures the funds are utilized to meet the individual's living expenses and daily needs, respect their rights to choice and to prevent any financial exploitation. (Please see attached Policies and Procedures on the Management of Individuals Funds).</p> <p>On 2/10/2014, staffs were trained on: Cash on hand and shift accounting for cash on hand. (Please see attached training documents)</p> <p>Please see attached documents that all staffs were retrained on the Monthly Financial Statement and Petty Cash Accountability Sheet. The forms were developed and implemented to track the finances of each consumer. At the beginning and end of each shift, 2 staff members will count and account for the consumers' petty cash in the home. One of the staff members will be from the shift that is leaving (signing out) and the other staff member will be from the oncoming shift (signing in). Both staff members will initial the cash on hand account form and document the counted amount of petty cash available per each consumer. If there are any missing funds, it is the responsibility of the staff member to immediately contact the house manager and the QDDP. (Please see attached Monthly Financial Statement and Petty</p>		

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	<p>further indicated the incident should have been immediately reported to the administrator and within 24 hours to BDDS.</p> <p>This federal tag relates to complaint #IN00144005.</p> <p>9-3-1(b)(5) 9-3-2(a)</p>		<p>CashAccountability Forms)</p> <p>The group home manager is responsible for monitoring andensuring that the staffs are following the rights of the consumers. Inaddition, the QDDP will observe during unannounced visits that the staffs arefollowing the rights of the consumers. It is the policy of TradeWinds Servicesto ensure that all clients have a safe environment free of aggression,exploitation, abuse, neglect and mistreatment. It is also the policy ofTradeWinds to ensure the health, welfare and rights of the individuals weseve.</p> <p>On 4/11/14, the QDDPs and Residential Coordinator was trainedon the finances for the consumers, which include: the Procedures for ongoinggroup home consumer bank record keeping, Monthly Financial Statement and PettyCash Accountability Forms. (Please see attached training documents)By May 31,2014, all House Managers will be re-trained on the finances for the consumersalso, which includes: the Procedures for ongoing group home consumer bankrecord keeping, Monthly Financial Statement and Petty Cash AccountabilityForms.</p> <p>The House Manager for the Forest Group Home wasimmediately removed from the schedule pending</p>		

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			<p>investigation. After a thorough investigation, the House Manager was terminated from TradeWinds Services, effective, Friday, March 21, 2014.</p> <p>For all allegations of Abuse, Neglect, Exploitation, Mistreatment and Injuries of unknown origin, the investigation will start within 24 hours of the alleged incident. When there is an allegation of Abuse, Neglect, Exploitation, Mistreatment and Injuries of unknown origin the staff person(s) involved will be removed immediately from the schedule pending outcome of the investigation. The staff person(s) involved is responsible for completing an internal incident report and notifying all necessary person(s), such as: House Manager, QDDP and Residential Nurse (if medical attention is needed). The QDDP must be notified as soon as the incident is under control and there is no further danger to either client(s) involved. The QDDP is responsible for making all necessary incident reports to the Bureau of Developmental Disabilities (BDDS) within the guidelines (within 24 hours of incident). TradeWinds Quality Assurance/Crisis Team meets monthly to review all internal incident reports in regards to all consumers. The Quality Assurance/Crisis Team also monitors trends for each incident.</p>		

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			The group home manager is responsible for monitoring and ensuring that the staffs are following the rights of the consumers. In addition, the QDDP will observe during unannounced visits that the staffs are following the rights of the consumers. It is the policy of TradeWinds Service to ensure that all clients have a safe environment free of aggression, exploitation, abuse, neglect and mistreatment. It is also the policy of TradeWinds to ensure the health, welfare and rights of the individuals we serve.	

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W000189	<p>483.430(e)(1) STAFF TRAINING PROGRAM</p> <p>The facility must provide each employee with initial and continuing training that enables the employee to perform his or her duties effectively, efficiently, and competently.</p> <p>Based on record review and interview, the facility failed for 4 of 4 sampled clients (A, B, C and D), and 4 additional clients (E, F, G and H), to provide group home staff with training on documenting and maintaining an accurate accounting system for clients' funds.</p> <p>Findings include:</p> <p>A review of the facility's Bureau of Developmental Disabilities Services (BDDS) reports and investigations was conducted on 3/13/14 at 11:15 A.M. and indicated:</p> <p>-BDDS report dated 1/31/14 indicated: "[Client B], [client C], [client D]. [client E], [client F], [client G] and [client H] are all residents of the [Group Home name]. On 1/31/14 at approximately 9:00 A.M., the QDDP (Qualified Developmental Disabilities Professional) was informed by staff that 7 of 8 consumers that live in the [Group Home name] had \$10.00 missing from their petty cash. Additionally, staff informed the QDDP that on Monday (January 27th), it was</p>	W000189	<p>On 2/10/2014, staffs were trained on: Cash on hand and shift accounting for cash on hand. (Please see attached training documents)</p> <p>Please see attached documents that all staffs weretrained on the Monthly Financial Statement and Petty Cash Accountability Sheet. The forms were developed and implemented to track the finances of each consumer. At the beginning and end of each shift, 2 staff members will count and account for the consumers' petty cash in the home. One of the staff members will be from the shift that is leaving (signing out) and the other staff member will be from the oncoming shift (signing in). Both staff members will initial the cash on hand account form and document the counted amount of petty cash available per each consumer. If there are any missing funds, it is the responsibility of the staff member to immediately contact the house manager and the QDDP. (Please see attached Monthly Financial Statement and Petty Cash Accountability Forms)</p> <p>TradeWinds has a policy on the Management of Individual Funds. "It</p>	04/13/2014			

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	<p>reported to the house manager that \$5.00 was missing from [client F's] petty cash envelope. This was never reported to the QDDP until 1/31/14, the house manager admitted that he just replaced the \$5.00 with his own money. The incident is currently under investigation. The House Manager has been suspended due to failing to report and for not having correct measures in place for staff to sign on/off to account for the consumers' petty cash at the beginning and end of their shift, which he was previously trained to do. On 1/31/14 all of he consumers stolen money was replaced by [Facility name] in the amount of \$10.00 for each consumer and placed in their petty cash envelope. Additionally, the QDDP has placed the proper documentation in the [Group Home name] that requires staff to count and account for the consumers' petty cash at the beginning and end of their shifts. Staff began using this documentation during the 3-11 shift on 1/31/14."</p> <p>An interview with the Qualified Intellectual Disabilities Professional (QIDP) was conducted on 3/14/14 at 10:25 A.M. When asked if group home staff were trained on documenting and maintaining an accurate accounting system for clients A, B, C, D, E, F, G and H's personal petty cash funds kept at the</p>		<p>is TradeWinds policy to manage the funds of each individual for whomwe are the Representative Payee in a way that ensures the funds are utilized tomeet the individual's living expenses and daily needs, respect their rights tochoice and to prevent any financial exploitation. (Please see attached Policiesand Procedures on the Management of Individuals Funds).</p> <p>In addition, TradeWinds also has a Procedure in place forongoing group home consumer bank record keeping. (Please see attached procedurefor ongoing group home consumer bank record keeping)</p> <p>The group home manager is responsible for monitoring andensuring that the staffs are following the rights of the consumers. Inaddition, the QDDP will observe during unannounced visits that the staffs arefollowing the rights of the consumers. It is the policy of TradeWinds Servicesto ensure that all clients have a safe environment free of aggression,exploitation, abuse, neglect and mistreatment. It is also the policy ofTradeWinds to ensure the health, welfare and rights of the individuals weseve.</p> <p>On 4/11/14, the QDDPs and Residential Coordinator was trainedon the finances for the consumers, which include: the</p>				

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	<p>group home, the QIDP stated "No." The QIDP indicated the group home manager was supposed to train all staff on documenting on the petty cash ledger and counting the clients' money on each shift, but through interviews it was found out he did not do so. The QIDP indicated all staff were trained after the reported incidents.</p> <p>This federal tag relates to complaint #IN00144005.</p> <p>9-3-3(a)</p>		<p>Procedures for ongoing group home consumer bank record keeping, Monthly Financial Statement and PettyCash Accountability Forms. (Please see attached training documents) By May 31, 2014, all House Managers will be re-trained on the finances for the consumers also, which includes: the Procedures for ongoing group home consumer bank record keeping, Monthly Financial Statement and Petty Cash Accountability Forms.</p> <p>The House Manager for the Forest Group Home was immediately removed from the schedule pending investigation. After a thorough investigation, the House Manager was terminated from TradeWinds Services, effective, Friday, March 21, 2014.</p>		