

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
CENTERS FOR MEDICARE & MEDICAID SERVICES

PRINTED: 01/20/2021  
FORM APPROVED  
OMB NO. 0938-0391

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  <b>495257</b>	(X2) MULTIPLE CONSTRUCTION A. BUILDING _____  B. WING _____	(X3) DATE SURVEY COMPLETED  <b>11/23/2020</b>
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NAME OF PROVIDER OR SUPPLIER  <b>THE LAURELS OF WILLOW CREEK</b>	STREET ADDRESS, CITY, STATE, ZIP CODE <b>11611 ROBIOUS ROAD MIDLOTHIAN, VA 23113</b>
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E 000	Initial Comments	E 000		
F 000	An unannounced abbreviated Emergency Preparedness COVID-19 Focused Survey was conducted onsite on 11/23/2020 and remotely 11/24/2020. The facility was in substantial compliance with 42 CFR Part 483.73, Requirement for Long-Term Care Facilities. INITIAL COMMENTS	F 000		
F 880 SS=D	An unannounced COVID-19 Focused Survey was conducted onsite on 11/23/2020 and remotely 11/24/2020. Corrections are required for compliance with F-880 of 42 CFR Part 483 Federal Long Term Care requirement(s).  On 11/23/2020, the census in this 120 certified bed facility was 98. Of the 98 current residents, three residents were currently positive for the COVID-19 virus with 14 recovered residents, one hospitalized and three reported deaths. The survey sample consisted of six current residents. (Residents #1, #2, #3, #4, #5, #6 and #7.) Infection Prevention & Control CFR(s): 483.80(a)(1)(2)(4)(e)(f)  §483.80 Infection Control The facility must establish and maintain an infection prevention and control program designed to provide a safe, sanitary and comfortable environment and to help prevent the development and transmission of communicable diseases and infections.  §483.80(a) Infection prevention and control program. The facility must establish an infection prevention and control program (IPCP) that must include, at a minimum, the following elements:	F 880		12/18/20

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE  Electronically Signed	TITLE	(X6) DATE 12/04/2020
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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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F 880	Continued From page 1  §483.80(a)(1) A system for preventing, identifying, reporting, investigating, and controlling infections and communicable diseases for all residents, staff, volunteers, visitors, and other individuals providing services under a contractual arrangement based upon the facility assessment conducted according to §483.70(e) and following accepted national standards;  §483.80(a)(2) Written standards, policies, and procedures for the program, which must include, but are not limited to: (i) A system of surveillance designed to identify possible communicable diseases or infections before they can spread to other persons in the facility; (ii) When and to whom possible incidents of communicable disease or infections should be reported; (iii) Standard and transmission-based precautions to be followed to prevent spread of infections; (iv)When and how isolation should be used for a resident; including but not limited to: (A) The type and duration of the isolation, depending upon the infectious agent or organism involved, and (B) A requirement that the isolation should be the least restrictive possible for the resident under the circumstances. (v) The circumstances under which the facility must prohibit employees with a communicable disease or infected skin lesions from direct contact with residents or their food, if direct contact will transmit the disease; and (vi)The hand hygiene procedures to be followed by staff involved in direct resident contact.	F 880			



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F 880	<p>Continued From page 2</p> <p>§483.80(a)(4) A system for recording incidents identified under the facility's IPCP and the corrective actions taken by the facility.</p> <p>§483.80(e) Linens. Personnel must handle, store, process, and transport linens so as to prevent the spread of infection.</p> <p>§483.80(f) Annual review. The facility will conduct an annual review of its IPCP and update their program, as necessary. This REQUIREMENT is not met as evidenced by: Based on observation, staff interview and facility document review it was determined that The facility staff failed to follow infection control practices to prevent the spread of infection during an identified COVID 19 outbreak, while obtaining vital signs (blood pressure, pulse, and temperature and oxygen saturation) for three of seven residents in the survey sample, identified as being on droplet and contact precautions, Resident #4, Resident #5 and Resident #6.</p> <p>The facility staff was observed using a mobile vital sign monitor going room to room without properly disinfecting it between uses for Resident #4, Resident #5 and Resident #6.</p> <p>The findings include:</p> <p>On 11/23/20 at 10:34 a.m., an observation was conducted of CNA (certified nursing assistant) #2. CNA #2 was observed at the entrance to Resident #4's room with a mobile vital sign monitor. A sign documenting in part, "Droplet (1) &amp; Contact Precautions (2)...STOP ..." was observed on the doorway to Resident #4's room.</p>	F 880	<p>The Laurels of Willow Creek wishes to have this submitted plan of correction stand as its allegation of compliance. Our date of alleged compliance is December 18, 2020.</p> <p>Preparation and/or execution of this plan of correction does not constitute admission to, nor agreement with, either the existence of or the scope and severity of any of the cited deficiencies, or conclusions set forth in the statement of deficiencies. This plan is prepared and/or executed to ensure continuing compliance with regulatory requirements.</p> <ol style="list-style-type: none"> <li>1. Resident #5 no longer resides in the facility. Vital sign equipment used with residents #4 and #6 have been cleaned with an EPA approved disinfectant, and all vital sign equipment has been cleaned with an EPA approved disinfectant.</li> <li>2. All residents have the potential to be affected by this alleged deficient practice.</li> <li>3. All nursing and therapy staff will be</li> </ol>		



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F 880	<p>Continued From page 3</p> <p>CNA #2 proceeded to don an isolation gown and gloves and was observed taking a mobile vital sign monitor into Resident #4's room and then closed the door. CNA #2 was observed exiting Resident #4's room at 10:38 a.m., without the gown or gloves and then proceed to Resident #5's doorway. A sign documenting in part, "Droplet &amp; Contact Precautions ...STOP ..." was observed on the doorway to Resident #5's room. CNA #2 proceeded to don an isolation gown and gloves and was observed taking the same mobile vital sign monitor into Resident #5's room at 10:39 a.m., and then closed the door to the resident's room. CNA #2 was observed exiting Resident #5's room without the gown or gloves at 10:42 a.m., and then proceed to Resident #6's doorway. A sign documenting in part, "Droplet &amp; Contact Precautions ...STOP ..." was observed on the doorway to Resident #6's room. CNA #2 proceeded to don an isolation gown and gloves and was observed taking the same mobile vital sign monitor into Resident #6's room at 10:45 a.m., and then closed the door. CNA #2 was observed exiting the room without gown or gloves at 10:49 a.m., and then proceeded to place the mobile vital sign monitor in the hallway outside of Resident #6's room.</p> <p>Observation of the mobile vital sign monitor revealed two reusable nylon blood pressure cuffs. The adult sized blood pressure cuff was observed rolled into itself and connected to the connection cables of the machine and the small sized blood pressure cuff was observed stored in the wire basket that was attached to the mobile vital sign monitor stand. Also stored inside the wire basket were 8 (eight) isopropyl alcohol prep pads (sterile pads saturated with alcohol), which were approximately two inches by two inches in size.</p>	F 880	<p>educated on properly disinfecting shared vital sign equipment in between residents.</p> <p>4. DON or designee will randomly audit vital sign equipment disinfection between residents through observation 5 times a week for 1 week, then 3 times a week for 2 weeks and then weekly for 2 weeks to ensure approved disinfectant is utilized. Variances will be corrected at the time of observation, education and corrective actions will be provided as needed. Ongoing compliance will be monitored through routine observations and will be reported to the facility's QA committee for 3 months.</p> <p>5. Corrective action will be completed by 12/18/2020</p>		



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F 880	<p>Continued From page 4</p> <p>There was also a touch free thermometer and a pulse oximeter (equipment that fits on the finger to monitor oxygen level) in the basket. There were no EPA approved COVID-19 disinfecting products observed on the mobile vital sign monitor.</p> <p>Review of Resident 4's clinical record revealed, Resident #4 was admitted to the facility with diagnoses that include, but are not limited to atrial fibrillation (3) and asthma (4). Resident #4's most recent MDS (minimum data set) was not due at the time of the survey. The nursing admission assessment dated 11/14/2020 documented Resident #4 as being alert and oriented to person, place and time.</p> <p>The comprehensive care plan for Resident #4 dated 11/17/2020 documented in part, "[Name of Resident #4] is presently on contact droplet precaution related to potential COVID-19 (5) exposure. Date Initiated: 11/17/2020 ..."</p> <p>The Physician's orders for Resident #4 documented in part, "Contact and Droplet Isolation (Transmission Based Precautions) r/t (related to) COVID-19; Order Date: 11/14/2020."</p> <p>Review of Resident 5's clinical record revealed, Resident #5 was admitted to the facility with diagnoses that include, but are not limited to osteomyelitis (6) and end stage renal disease (7). Resident #5's most recent MDS (minimum data set), an admission assessment with an ARD (assessment reference date) of 11/04/2020, coded Resident #5 as scoring a 15 on the brief interview for mental status (BIMS) of a score of 0 - 15, 15 - being cognitively intact for making daily decisions.</p>	F 880			

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F 880	<p>Continued From page 5</p> <p>The comprehensive care plan for Resident #5 dated 10/29/2020 documented in part, "[Name of Resident #5] is presently on contact droplet precaution related to possible exposure to COVID-19. Date Initiated: 10/29/2020 ..."</p> <p>The Physician's orders for Resident #5 documented in part, "Contact and Droplet Isolation (Transmission Based Precautions) r/t COVID-19; Order Date: 10/28/2020."</p> <p>Review of Resident 6's clinical record revealed, Resident #6 was admitted to the facility with diagnoses that include, but are not limited to encephalopathy (8) and dementia (9). Resident #6's most recent MDS (minimum data set), an admission assessment with an ARD (assessment reference date) of 10/30/2020, coded Resident #6 as scoring a 9 on the brief interview for mental status (BIMS) of a score of 0 - 15, 9 - being moderately impaired for making daily decisions.</p> <p>The comprehensive care plan for Resident #6 dated 10/25/2020 documented in part, "[Name of Resident #6] presently on contact droplet precaution related to possible exposure to COVID-19- new admission. Date Initiated: 10/25/2020 ..."</p> <p>The Physician's orders for Resident #6 documented in part, "Contact and Droplet Isolation (Transmission Based Precautions) r/t COVID-19; Order Date: 10/26/2020."</p> <p>On 11/23/20 at approximately 11:30 a.m., an interview was conducted with CNA #2. CNA #2 stated that they monitored resident's vital signs including blood pressure, pulse, oxygen</p>	F 880			



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F 880	<p>Continued From page 6</p> <p>saturation and respirations every four hours. CNA #2 stated that they were not sure of the protocol for monitoring vital signs because they worked through an agency but that was their personal practice. When asked about the process for disinfecting the mobile vital sign monitor observed taken from Resident #4's room to Resident #5's room and to Resident #6's room, CNA #2 stated that they used the alcohol prep pads to disinfect the shared equipment between uses. CNA #2 stated that they cleaned the machine, blood pressure cuff, and the thermometer and pulse oximeter with the alcohol prep pads when they went into the residents' room and after they took the vital signs before they left the room. CNA #2 stated that they let the surface dry for ten seconds prior to use. CNA #2 proceeded to show this surveyor the alcohol prep pads located in the wire basket on the mobile vital sign monitor and stated that they used approximately three of the pads each time they cleaned the equipment. The alcohol prep pad was labeled, "Alcohol 70% prep pad medium [Name of manufacturer] 2 ply pad."</p> <p>On 11/23/20 at approximately 9:53 a.m., an interview was conducted with CNA #1. CNA #1 stated that shared medical equipment was cleaned between each resident use with bleach wipes. CNA #1 stated that the equipment was wiped down with the bleach wipes and left to air dry.</p> <p>On 11/23/20 at approximately 11:45 a.m., an interview was conducted with LPN (licensed practical nurse) #1. LPN #1 stated that shared blood pressure cuffs, mobile vital sign monitors and pulse oximeters were cleaned between each resident with bleach wipes. LPN #1 stated that</p>	F 880		

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F 880	<p>Continued From page 7</p> <p>they were wiped down with the bleach wipes and left to dry. LPN #1 stated that they also had Lysol disinfectant spray that was used after the bleach to spray items down and leave to dry.</p> <p>On 11/23/20 at approximately 12:07 p.m., an interview was conducted with ASM (administrative staff member) #1, the administrator. ASM #1 stated that all shared medical equipment, including mobile vital sign monitors and pulse oximeters should be sanitized between each guest. ASM #1 stated that they have bleach wipes, Micro-kill (brand name of disinfectant wipe or spray) and Super HDQ (brand name of disinfectant). ASM #1 stated that alcohol prep pads were typically not used except in cases to remove bleach residue. ASM #1 stated that alcohol prep pads were not typically used for medical equipment but they would confirm.</p> <p>On 11/23/20 at approximately 12:10 p.m., a request was made to ASM #1 for the facility policy regarding disinfection of shared medical equipment.</p> <p>On 11/23/20 at 5:15 p.m., ASM #1 provided an email stating, "Here is the policy you asked for." The email contained the document, "Lippincott Procedures- Disinfection, noncritical patient care equipment, Revised: November 20, 2020." It documented in part, "...Disinfect the patient care equipment with an EPA (Environmental Protection Agency)-registered, facility approved disinfectant following the label's safety precautions and directions for use. Make sure the noncritical item is exposed to the disinfectant for the length of time indicated on the product label ..."</p> <p>The facility policy "Coronavirus (COVID 19),</p>	F 880			



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F 880	<p>Continued From page 8</p> <p>Revised 11/17/2020" documented in part, "Policy, Appropriate measures will be utilized for the prevention and control of the Coronavirus (COVID 19) ...Mode of Transmission ...Spread from contact with contaminated surfaces or objects, It may be possible that a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes, but this is not thought to be the main way the virus spreads ..."</p> <p>The policy further documented, " ...Contact Precautions: ...Use disposable or dedicated patient care equipment if available. If common use of equipment for multiple patients is unavoidable, clean and disinfect equipment before use on another patient ..."</p> <p>On 11/24/20 at 7:50 a.m., a request was made to ASM #1 for a copy of the manufacturer's instructions for use (IFU) for cleaning of the mobile vital sign monitor. An IFU was not provided prior to exit.</p> <p>The manufacturer's product description for [Name of manufacturer] 2-ply alcohol prep pads, sterile, size M (medium) documented in part, " ...Ideal for removal of oils and residue from skin, Topical antiseptic helps to reduce bacteria on the skin and makes these pads ideal for use prior to injections ...This product is intended for use on the body only ..." (10)</p> <p>The CDC (Center for Disease Control) "Interim Infection Prevention and Control Recommendations for Healthcare Personnel During the Coronavirus Disease 2019 (COVID-19) Pandemic, Updated Nov. 4, 2020" documented the following in part: - "Dedicated medical equipment should be used</p>	F 880		

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F 880	<p>Continued From page 9</p> <p>when caring for patients with suspected or confirmed SARS-CoV-2 infection.</p> <ul style="list-style-type: none"> <li>- All non-dedicated, non-disposable medical equipment used for patient care should be cleaned and disinfected according to manufacturer's instructions and facility policies.</li> <li>- Ensure that environmental cleaning and disinfection procedures are followed consistently and correctly.</li> <li>- Routine cleaning and disinfection procedures (e.g., using cleaners and water to pre-clean surfaces prior to applying an EPA-registered, hospital-grade disinfectant to frequently touched surfaces or objects for appropriate contact times as indicated on the product's label) are appropriate for SARS-CoV-2 in healthcare settings, including those patient-care areas in which aerosol generating procedures are performed.</li> <li>- Refer to List N on the EPA website for EPA-registered disinfectants that have qualified under EPA's emerging viral pathogens program for use against SARS-CoV-2." (11)</li> </ul> <p>Review of the EPA List N failed to evidence Alcohol 70% prep pad medium [Name of manufacturer] 2-ply pad as a COVID-19 Disinfectant. (12)</p> <p>On 11/24/20 at approximately 9:30 a.m., ASM #1, the administrator was made aware of the findings.</p> <p>No further information was provided prior to exit.</p> <p>References:</p> <ol style="list-style-type: none"> <li>1. Droplet precautions Droplet precautions are used to prevent contact</li> </ol>	F 880		



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F 880	<p>Continued From page 10</p> <p>with mucus and other secretions from the nose and sinuses, throat, airways, and lungs. When a person talks, sneezes, or coughs, droplets that contain germs can travel about 3 feet (90 centimeters). Illnesses that require droplet precautions include influenza (flu), pertussis (whooping cough), mumps, and respiratory illnesses, such as those caused by coronavirus infections. Anyone who goes into the room should wear a surgical mask. This information was obtained from the website: <a href="https://medlineplus.gov/ency/patientinstructions/000446.htm">https://medlineplus.gov/ency/patientinstructions/000446.htm</a></p> <p>2. Contact Precautions Contact precautions may be needed for germs that are spread by touching. Contact precautions help keep staff and visitors from spreading the germs after touching a person or an object the person has touched. Some of the germs that contact precautions protect from are C difficile and norovirus. These germs can cause serious infection in the intestines. Anyone entering the room who may touch the person or objects in the room should wear a gown and gloves. This information was obtained from the website: <a href="https://medlineplus.gov/ency/patientinstructions/000446.htm">https://medlineplus.gov/ency/patientinstructions/000446.htm</a></p> <p>3. Atrial fibrillation A problem with the speed or rhythm of the heartbeat. This information was obtained from the website: <a href="https://www.nlm.nih.gov/medlineplus/atrialfibrillation.html">https://www.nlm.nih.gov/medlineplus/atrialfibrillation.html</a></p> <p>4. Asthma A disease that causes the airways of the lungs to swell and narrow. It leads to wheezing, shortness</p>	F 880			

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NAME OF PROVIDER OR SUPPLIER  <b>THE LAURELS OF WILLOW CREEK</b>			STREET ADDRESS, CITY, STATE, ZIP CODE <b>11611 ROBIOUS ROAD MIDLOTHIAN, VA 23113</b>		
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F 880	<p>Continued From page 11</p> <p>of breath, chest tightness, and coughing. This information was obtained from the website: <a href="https://medlineplus.gov/ency/article/000141.htm">https://medlineplus.gov/ency/article/000141.htm</a>.</p> <p>5. COVID-19 COVID-19 is caused by a coronavirus called SARS-CoV-2. Coronaviruses are a large family of viruses that are common in people and may differ species of animals, including camels, cattle, cats, and bats. Rarely, animal coronaviruses can infect people and then spread between people. This occurred with MERS-CoV and SARS-CoV, and now with the virus that causes COVID-19. The SARS-CoV-2 virus is a betacoronavirus, like MERS-CoV and SARS-CoV. All three of these viruses have their origins in bats. The sequences from U.S. patients are similar to the one that China initially posted, suggesting a likely single, recent emergence of this virus from an animal reservoir. However, the exact source of this virus is unknown. This information was obtained from the website: <a href="https://www.cdc.gov/coronavirus/2019-ncov/faq.html#How-COVID-19-Spreads">https://www.cdc.gov/coronavirus/2019-ncov/faq.html#How-COVID-19-Spreads</a></p> <p>6. Osteomyelitis Osteomyelitis is the medical term for inflammation in a bone. It's usually caused by a bacterial infection. It often affects the long bones of the arms and legs, but can happen in any bone. This information was obtained from the website: <a href="https://kidshealth.org/en/parents/osteomyelitis.html">https://kidshealth.org/en/parents/osteomyelitis.html</a></p> <p>7. End-stage kidney disease The last stage of chronic kidney disease. This is when your kidneys can no longer support your body's needs. This information was obtained</p>	F 880			



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F 880	Continued From page 12 from the website: <a href="https://medlineplus.gov/ency/article/000500.htm">https://medlineplus.gov/ency/article/000500.htm</a> .  8. Encephalopathy A term for any diffuse disease of the brain that alters brain function or structure. This information was obtained from the website: <a href="http://www.ninds.nih.gov/disorders/encephalopathy/encephalopathy.htm">http://www.ninds.nih.gov/disorders/encephalopathy/encephalopathy.htm</a> .  9. Dementia A loss of brain function that occurs with certain diseases. It affects memory, thinking, language, judgment, and behavior. This information was obtained from the website: <a href="https://medlineplus.gov/ency/article/000739.htm">https://medlineplus.gov/ency/article/000739.htm</a> .  10. This information was obtained from the website: <a href="https://www.medline.com/sku/item/MDPMD5090735Z?skuIndex=S5&amp;question=&amp;flowType=&amp;indexCount=">https://www.medline.com/sku/item/MDPMD5090735Z?skuIndex=S5&amp;question=&amp;flowType=&amp;indexCount=</a>  11. This information was obtained from the website: <a href="https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Finfection-control%2Fcontrol-recommendations.html">https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Finfection-control%2Fcontrol-recommendations.html</a>  12. This information was obtained from the website: <a href="https://cfpub.epa.gov/giwiz/disinfectants/index.cfm">https://cfpub.epa.gov/giwiz/disinfectants/index.cfm</a>	F 880			