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CITY AND COUNTY OF SAN FRANCISCO
9 dba Laguna Honda Hospital & Rehabilitation Center D/P SNF

10 Department of Health and Human Services
11 **DEPARTMENTAL APPEALS BOARD**
12 Civil Remedies Division

13 In the Case of:

Hon. Steven T. Kessel

14 LAGUNA HONDA HOSPITAL &
15 REHABILITATION CENTER D/P SNF
(CCN: 05-5020),

Docket No: C-22-555

16 Petitioner,

Date: September 19, 2022

17 vs.

18 Centers for Medicare & Medicaid Services,

19 Respondent.

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21 **Petitioner Exhibit List**
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Exhibit Number	Exhibit Title/Description	Number of Pages
1	Statements of Deficiencies and Plans of Correction	428
2	Witness Statements – Written Direct Testimony	71
3	Resident Records Relating to October 14, 2021 Survey	1606
4	Documents Relating to Plan of Correction for Deficiency Tag F689 from the October 14, 2021 Survey	427
5	Documents Relating to Plan of Correction for Deficiency Tag F726 from the October 14, 2021 Survey	388
6	Documents Relating to Plan of Correction for the October 15, 2021 Complaint Survey	143
7	Documents Relating to Plan of Correction for the November 5, 2021 Complaint Survey	184
8	Documents Relating to Plan of Correction for the December 21, 2021 Complaint Survey	96
9	Documents Relating to Plan of Correction for the December 28, 2021 Complaint Survey	110
10	Documents Relating to Plan of Correction for the January 13, 2022 Complaint Survey	66
11	January 21, 2022 Revisit Survey	279
12	Laguna Honda Policies and Procedures	139
13	State Operations Manual (Advanced Copy)	847
14	COVID-19 Smoking Policies	35
15	Clinical Search with Items Found	5

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	Witness	Address	Summary of Anticipated Testimony	Pages
1				
2	1. Yifang Qian, M.D., Ph.D., Chief of Psychiatry, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Explanation of Laguna Honda harm reduction policy and behavioral health/substance use disorder treatment • Medical opinion of medical records for Residents 1 and 3 • Explanation of corrections 12, 13, and 14 for December 2021 Plan of Correction 	Pages 1-10
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8	2. Wilmie Hathaway, D.O., Chief Medical Officer, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Explanation of Laguna Honda's substance use treatment • Medical opinion of medical records for Residents 1, 3, 4, 27, and 32 • Explanation of lighter confiscation and storage policies 	Pages 11-16
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14	3. Crystal Figlietti, RN, Nursing Director, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Explanation of Laguna Honda training and education practices • Explanation of in-service training to correct F726 deficiency tag • Observation of April 2022 revisit survey 	Pages 17-21
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18				
19	4. Zexu Fang, RN, Nurse Manager, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Laguna Honda lighter confiscation policy • Staff interventions for substance use • Clinical searches and confiscation of contraband • Training received for clinical searches • Assessments of residents 	Pages 22-26
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26	5. Basil Price, Director of Security, San Francisco	1001 Potrero Avenue, San Francisco, CA 94110	<ul style="list-style-type: none"> • Facility screening practices before and after October 2021 • Disposal of contraband 	Pages 27-31
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	Witness	Address	Summary of Anticipated Testimony	Pages
	Department of Public Health		<ul style="list-style-type: none"> • Implementation for corrections 8, 9, 10, and 11 for December 2021 Plan of Correction 	
6.	Nawzaneen Talai, Chief Quality Officer, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Explanation of harm reduction model • Clinical searches and urine toxicology screens • Screening of residents and visitors entering the facility • Laguna Honda discharge practices • Observation of CDPH surveyors in August and October 2021 and March and April 2022 • Observation of meetings with CDPH and CMS • Confiscation and disposal of contraband and lighters • Unusual occurrence documentation • Lighter storage policy • Complaint surveys • Explanation of facility Plans of Correction 	Pages 32-40
7.	Brigitta Van Ewijk, RN, MSN, Nurse Manager, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Explanation of COVID-19 smoking and lighter storage policy • Confiscation of contraband and clinical searches • Explanation of safe and unsafe smokers • Explanation of substance use and interventions • Accessibility of Narcan • Training on clinical searches for F726 deficiency tag Plan of Correction 	Pages 41-47

	Witness	Address	Summary of Anticipated Testimony	Pages
			<ul style="list-style-type: none"> • Contraband transfer forms 	
8.	Namnama Angeles, RN, Nurse Manager, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Explanation of COVID-19 smoking and lighter storage policy • Confiscation and disposal of contraband and clinical searches • Explanation of safe and unsafe smokers • Explanation of substance use and interventions • Accessibility of Narcan • Training on clinical searches for F726 deficiency tag Plan of Correction • Resident out on pass assessments 	Pages 48-53
9.	Sheilah Zarate, RN, Nurse Manager, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Confiscation of contraband • Explanation of clinical searches • Explanation of smoking assessments and smoking policy • Training on clinical searches for F726 deficiency tag Plan of Correction • Resident out on pass assessments 	Pages 54-59
10.	Barbara Douglass, Medical Social Worker, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • Explanation of smoking policy and COVID-19 smoking policy • Interventions performed by social workers for substance use disorder • Laguna Honda discharge procedures 	Pages 60-65
11.	Ricky Ng, Medical Social Worker, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none"> • COVID-19 lighter storage and smoking policy • Social worker interventions for smoking and substance use 	Pages 66-71

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	Witness	Address	Summary of Anticipated Testimony	Pages
		Francisco CA, 94116	<ul style="list-style-type: none">• Social worker support for clinical searches• Laguna Honda discharge procedures	
12.	Charles Lamb, RN, Director of Risk Management, Laguna Honda	375 Laguna Honda Blvd., San Francisco CA, 94116	<ul style="list-style-type: none">• Authentication of Petitioner Exhibits	