

San Francisco Department of Public Health
Laguna Honda Hospital
Initial CMS Recertification Survey Readiness Assessment
Skilled Nursing Facility
Acute Care
June 13, 2022

Health Management Associates (HMA) was engaged by the San Francisco Department of Public Health (SFDPH) on May 9, 2022, to conduct a Center for Medicaid Services (CMS) recertification readiness assessment of Laguna Honda Hospital (Laguna Honda), which commenced May 16, 2022. The following readiness assessment is based on activities and observations made by a team of HMA subject matter experts as of June 10, 2022. Information was gathered from document review, rounding on resident care units and the acute unit, and interviews with SFDPH leadership, members of Laguna Honda's newly implemented Incident Command Structure, frontline staff, mid-level management, and residents. HMA has observed many positive factors that can be leveraged in recertification efforts including sufficient nursing staff, low staff turnover rates, a relatively new and modern facility, and strong support from SFDPH and the City of San Francisco.

HMA identified persistent and systemic issues that led to CMS decertification on April 14, 2022. As such, HMA has and continues to examine and recommend changes to **strengthen core organizational factors** in the categories of **leadership, culture, communications, education, and accountability throughout the organization**. These core issues must be addressed as part of an urgent change management effort for organizational stabilization needed for survey preparation and sustainability needed to assure future operations.

HMA has identified the following areas that have significant regulatory compliance deficiencies:

- **Infection Control** Continuous related concerns on infection prevention and control issues remain Laguna Honda's biggest clinical barrier to recertification. Observations reveal concerns including but not limited to compliance with COVID-19 protocols, the proper use of PPE, and appropriate and consistent hand hygiene.
- **Resident Rights** Portions of Laguna Honda facility include areas with limited/impaired access to units/neighborhoods for residents who utilize assistive devices (wheelchairs, walkers etc.) due to a lack of automated ingress buttons. This can result in resident accidents and injury in trying to use assistive devices to push doors open. Personal hygiene items are stored in staff areas and can only be accessed by staff. This deprives residents of access to personal items.

- **Freedom from Abuse/Neglect and Exploitation** concerns have been noted with several instances of physical restraint of resident (i.e., inappropriate use of seatbelts or furniture to block movement). In addition, an unacceptable response to call times was noted across the organization.
- **Quality of Care** concerns exist as a comprehensive resident restorative program has not been implemented, and the activities offered are inadequate given the lack of evening offerings. Nationally, there has been a focus on ensuring appropriate restorative programming and activities have been implemented as a lack of limited programming and interaction during the COVID-19 pandemic has driven a noted decline in functions in SNF residents. Crash carts behind locked doors, no red plugs in those rooms, red plugs in nursing stations, delay of care in emergency situations
- **Quality Assurance Performance Improvement (QAPI)** A review of the most current data (Q2 2022) submitted to the Quality Meeting at Laguna Honda showed that only 44% of the metrics were met, leaving deficiencies in 56% of tracked metrics. The areas of greatest concern with demonstrated gaps were Abuse allegations (percent open and unresolved as well as the high total number reported), incomplete and/or updated care plans, and the gap in SUD programming engagement.
- **Outpatient Clinic** This area will be surveyed during the Mock Survey Process. Significant concerns about processes of care and appropriate environment and equipment needed to meet care standards were observed during rounding
- **Acute Care** Several times the HMA observed only one licensed staff member on the unit. Medication Room door left propped open and unattended – observed two times.
- **Facilities** First impressions are critical and are well known to set the tone for a survey in the eyes of the surveyors. The common areas within the Pavillion are bright and clean, which is a contrast to several of the resident units which show a cluttered, disorganized, poorly maintained, and dirty environment as the first impressions. This will negatively impact a surveyor at the start of the survey.

Initiatives Completed and In Progress

- The existing Laguna Honda nursing leadership structure did not provide sufficient resources and management bandwidth to effectively operate resident care units and support unit staff. HMA and Health Services Advisory Group (HSAG) jointly recommended an immediate modification to the nursing structure. One of the key changes recommended is to create three Director of Nursing (DON) positions. Two of the DONs would take responsibility for all units in a tower at Laguna Honda and would have an Assistant Director of Nursing (ADON) reporting to each. In addition, a new DON position has been recommended to take responsibility for Nursing Operations, including services that are shared to support all units, such as Staffing, Education, etc.
- DON and ADON will pursue certification as Directors of Nursing in Long Term Care, providing each incumbent with the knowledge, skills, and credentials to serve as skilled nursing facility leaders.
- Conducted communications strategy session with Laguna Honda leadership to Developing and implementing an internal communications campaign that honors Laguna

Honda's long history while engaging staff at all levels to strive toward a new future with a clear call to action achieving recertification.

- Education and training in progress on nursing units by Laguna Honda, HSAG, and HMA. Recommend additional actions to assure compliance and accuracy
- Code Blue: Nursing Supervisors to be ACLS certified and participate in all Code Blue events to provide ACLS support. Crash carts moved to nursing stations areas with emergency power outlets
- All medications and supplements to be kept in the medication cart
- Facilities repairs continue as issues are identified

These deficiencies translate to a high risk of high scope and severity findings or “Tags” from the Medicare Conditions of Participation. It is our determination that **if Laguna Honda were to be surveyed immediately by CMS, Laguna Honda Hospital would not be found in substantial compliance and granted recertification.** We will provide specificity in the Mock Survey Report, following survey work to be conducted by the end of June.

As part of our engagement and assessment, members of the HMA team have attended a range of standing and ad hoc committee meetings and invested extensive time in resident care units observing care delivery, the environment of care, the facilities, and equipment. We have also witnessed, to some extent, care and treatment in process in all units. We have also conducted in-depth document reviews, including thorough reading and analysis of past survey results. Our team has, to a significant extent, analyzed and categorized the findings of past surveys to guide current observations.

Our principal limitation during the beginning of this assessment has been our inability to access EPIC, Laguna Honda's electronic health record (EHR) system. Access to the EHR is critical, as the survey process is driven by a review of the care delivery processes as documented in the EHR. Only when our team can fully replicate the CMS surveyor process, will we be able to accurately determine recertification readiness with greater certainty.