

# Compliance Summary Report

Compliance Summary Report of **ICF/ID Review Tool 1/31/14** on **NEW AVENUES TO INDEPENDENCE, INC.**

Reviewer: **Julie Gregg**

Total Cites: **2**

Provider: **NEW AVENUES TO INDEPENDENCE, INC.**

Total POCs: **2**

County Name: **Cuyahoga County**

## CITE #1

Question	Explanation	
If the IP includes DELEGATED NURSING services, has the nurse completed a statement of delegation?	The provider failed to provide evidence of a current Statement of Delegation having been completed for all individuals in the sample. The Statement of Delegation presented during the review on 1/7/14 for these individuals was completed on 1/1/13.	
POC	Status	Comments
<p>Submission of this Plan of Correction is not a legal admission that a deficiency exists or existed or that this Statement of Deficiency was correctly cited, and is also not be construed as an admission against New Avenues to Independence, Inc. (NATI), the Administrator or any employees, agents or other individuals who draft or may be discussed in this Plan of Correction. In addition, preparation and submission of this Plan of Correction does not constitute an admission or agreement of any kind by the facility of the truth of any facts alleged or the correctness of any conclusions set forth in this allegation by the survey agency. New Avenues maintains that the alleged deficiencies do not individually nor collectively jeopardize the health or safety of our residents nor are of such characteristic so as to limit our capability to render adequate care. THIS PLAN OF CORRECTION SHALL ALSO OPERATE AS THE FACILITY'S WRITTEN CREDIBLE ALLEGATION OF COMPLIANCE EFFECTIVE JANUARY 30, 2014 OR EARLIER IF SO DESIGNATED BY THE INFORMATION CONTAINED BELOW. It is the intent and practice of NATI to ensure that all regulations regarding Master Signature Logs are signed yearly to observe the 365 day rule. NATI had such logs in place, dated by the primary nurse on January 1, 2014 and signed by Edgerton staff between January 1 and January 14, 2014. The logs for 2013 were signed by Edgerton staff between January 3 and January 13, 2013. The form was signed by the primary nurse and dated January 1, 2013 to symbolize NATI's compliance with the 365 day rule. NATI's intent is for staff to sign the Annual logs within 2 weeks of initiation of subsequent year's Master Signature Logs. All NATI nurses will receive documented re-training to initiate the new year's Master Signature Logs during the last 2 weeks of the preceding year to ensure that they are signed and dated by the nurse for the upcoming year. Re-training will be completed by January 30, 2014. NATI Primary Nurses and QA nurse to monitor for compliance yearly. Completion Date: January 30, 2014</p>	Approved	

CITE #2

Question	Explanation	
<p>Does the ICF/ID ensure that cash accounts, savings accounts, and checking accounts are reconciled at least every 60 days by someone who does NOT handle the individual funds?</p>	<p>The provider failed to ensure that the all individual accounts were reconciled at least every 60 days by someone who does not handle the individual funds as evidenced by the following:-There was no evidence that the Cash on Hand and individual checking accounts for all individuals in the sample were reconciled between 10/9/13 and 1/6/14.</p>	
POC	Status	Comments
<p>It is the policy and expectation that all resident funds managed by NATI on behalf of the individuals served is handled in accordance with DODD &amp; Medicaid regulations governing ICF/DD homes. All NATI employees responsible for managing resident funds receive documented training to ensure compliance with agency and outside entities pertaining regarding, but limited to, the frequency of reconciliation of bank and cash-on-hand accounts. Per NATI policy and procedures all individual's financial accounts including, but not limited to, Dollar Bank Accounts and Cash-on-Hand accounts are to be scheduled for reconciliation by NATI's Account Assistant every thirty (30) days to ensure that should an appointment need to be canceled/rescheduled the sixty day rule will still be met. All NATI QIDPs have been trained regarding this procedure and are aware of the importance of complying with this procedure. A review of records for Edgerton indicated the following: Reconciliation scheduled for Edgerton Records for 2013 were completed according to the 60-day rule with the one exception indicated below:Reconciliation appointment scheduled for 11/06/13 to review October Financials was canceled due to a four day sick leave by Maria Hamler, QIDP.The next available date for reconciliation was for 12/24/13 which was also canceled by Maria Hamler. It should be noted that even if this appointment had not been cancelled the reconciliation still would have been out of compliance with the 60-day rule. The next available appointment was 01/6/14. On this date Edgerton financials for Oct and Nov 2013 were reconciled. Edgerton financials for Dec 2013 is scheduled to be done on 2/3/2014. QIDP received documented re-training to ensure that if she has to cancel a scheduled reconciliation appointment in the future she must ensure that she has rescheduled another appointment within the 60-day rule timeframe. Also QIDP was reminded to schedule appointments monthly to ensure that the reconciliations are completed within the 60-day rule going forward. (See attached documentation of training for Edgerton QIDP)Completion Date: 01/20/14Program Director to Monitor for Compliance</p>	<p>Approved</p>	