

Case One
Intermediate Care Facility/Individuals with Intellectual Disabilities Learning Activity

Item	Description	
Objective:	Given a scenario, the surveyor will identify areas of concern, potential citations, and related regulatory requirements.	
Prior to Class:	Print copies of the scenarios. Have the ICF/IID regulations available. Have flip charts and markers available.	
Total Time for Activity:	60 minutes (The time given is approximate.)	
Set-Up:	Set class up for small groups if appropriate.*	
Step:	Preceptor Instructions:	Activity Time:
1.	Divide the class into small groups. Provide each group a set of scenarios.*	5 min.
2.	Each group should select someone to take notes on the flip charts and be prepared to report to class. Groups must answer the questions provided for each of their scenarios.	5 min.
3.	Give the teams time to read and discuss the scenario.	25 min.
4.	As the groups are completing this task, walk around the room and listen to the conversations. Provide direction where appropriate. Warn the class when the time available is down to the last five minutes.	
5.	Debrief each scenario by discussing key points contained in the Preceptor Answer Sheet.	25 min.

*For individual assignment, provide the worksheet and support where appropriate during the completion of the activity. Once completed, review answers against the answer sheet, and discuss the key points together from the scenario.

Surveyor:

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Directions: Read each scenario and, working as a team (if able), document your answers on the flip chart provided.

Behavior or Not?

You are interviewing a client who says to you repeatedly, “I have to poop, I can’t poop, I can’t poop, I can’t poop.”

Survey Team Questions:

1. What areas of concern do you have?
2. If you noticed any areas, explain why you are concerned.
3. How would you continue to investigate your concerns?
4. Do you think there will be potential deficiencies cited? Defend your answer.

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Preceptor Answer Sheet

1. What areas of concern do you have?
 - Verify client is talking about his bowel movements. Review bowel regimen. Is this a behavior issue? If you noticed any areas, would you stop the nurse and point these out?
 - Areas of concern include constipation, inadequate fluid intake, inadequate fiber intake, inadequate exercise, potential use of laxatives, lack of medical monitoring, and inadequate behavioral services.

2. If you noticed any areas, explain why you are concerned. (Document on the flip chart provided.)
 - Is this a medical condition that is causing a behavior problem or is this maladaptive behavior?
 - Determine if the client is on a behavior modification plan related to toileting skills, potentially causing this repetitive statement.
 - There is concern because health (e.g., possible bowel obstruction) and/or behavioral needs are not being met.

3. How would you continue to investigate your concerns?
 - Continue the observation to see how staff responds to the client. Observe client's behavior above and beyond this verbalization (pacing, digging, back and forth to the bathroom).
 - Interview staff to obtain information regarding the facility's bowel protocol. Ask staff about this specific resident's current behavior.
 - Interviews with direct care, nursing, and dietary staff should be conducted across shifts. Record review should include fluid and/or food intake, the nutritional evaluation, bowel records, nursing notes, physician orders, medication administration records, toileting programs, communication and behavior assessments, toileting and dietary programs, and the behavior plan. Policies related to neglect, staff training, and dietary and medical services could also be reviewed.
 - Review medical records for constipation. Is constipation being addressed in the client's care plan? If so, how is it addressed? Review medications. Review diet and fluid intake.
 - Do they monitor fluid intake?
 - Where to find the information: Larger facilities may have different departments for dietary, nursing services, and medications so you need to locate, review, and interview a variety of sources. In smaller facilities, all of the information may be in a central location and the Qualified Intellectual Disabilities Professional (QIDP) may be responsible for most areas.

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4. Do you think there will be potential deficiencies cited? Defend your answer.
- W149 as it relates to neglect (failing to provide necessary services)
 - W192 and W342 as they relate to staff training to meet health needs
 - W214 as it relates to assessment of toileting behavior
 - W216 as it relates to assessment of constipation
 - W227 as it relates to developing objectives to meet toileting, adequate intake, and exercise needs
 - W242 as it relates to programmatic training to address toileting and eating needs
 - W249 as it relates to implementing toileting and dietary plans
 - W318, Condition of Participation for Health Care Services
 - W322 as it relates to providing preventive health care services
 - W331 as it relates to providing nursing services
 - W338 as it relates to taking necessary action to address health problems
 - W344 and W345 as they relate to sufficient nursing personnel, monitoring, and oversight
 - W365 as it relates to medication administration records
 - W368 as it relates to administering drugs in compliance with physician orders
 - W460 as it relates to providing adequate nutrition

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Directions: Read each scenario and, working as a team (if able), document your answers on the flip chart provided.

Where Do You Want to Go?

You have been observing Client A for the day. You notice that although he attends a day center and activities at the facility, he does not seem to participate. Facility staff tell him where to go and when. He obeys and sits passively throughout.

Survey Team Questions:

1. What areas of concern do you have?
2. If you noticed any areas, explain why you are concerned.
3. How would you continue to investigate your concerns?
4. Do you think there will be potential deficiencies cited? Defend your answer.

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Preceptor Answer Sheet

1. What areas of concern do you have?
 - Facility staff did not ask Client A for his input. You have not observed any programs being attended.
 - Areas of concern include lack of active treatment including comprehensive assessments, program implementation, staff encouraging participation when opportunities present themselves, and lack of monitoring. If you noticed any areas, explain why you are concerned. (Document on the flip chart provided.)
 - You have not observed “active” treatment.
 - There is concern because active treatment is not occurring.

3. How would you continue to investigate your concerns?
 - Ask direct care staff and the day treatment staff present at the time what is happening with Client A.
 - Review Individual Program Plans (IPP) and active treatment plans.
 - Determine what interventions have been attempted.
 - Do they have and implement a positive reinforcement program?
 - Additional observations and interviews with direct care staff should be conducted across shifts and in all areas visited by the individual. Record review (from both the day program and the facility) should include the comprehensive functional assessment, the IPP, training programs, the behavior plan, active treatment schedules, and program summaries. Policies related to staff training and active treatment services could also be reviewed as well as the contract with the day program if it is an outside agency.

4. Do you think there will be potential deficiencies cited? Defend your answer.
 - W117 as it relates to contracts with outside service agencies
 - W120 as it relates to outside services meeting the individual's needs and coordination of services
 - W159 as it relates to QIDP monitoring and oversight
 - W189 and W194 as they relate to staff training on active treatment services
 - W195, Condition of Participation for Active Treatment Services and condition level, active treatment problems
 - W224 as it relates to assessment of adaptive behavior and independent living skills
 - W227 as it relates to developing objectives to meet identified needs
 - W242 as it relates to developing training to address basic needs
 - W247 as it relates to providing opportunities for choice and self-management
 - W249 as it relates to implementing training programs and active treatment

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- W250 as it relates to active treatment schedules
- W255-W257 as they relate to program monitoring and change

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Can I Get a Little Privacy?

You are going in to watch a medication being given via a tube. One of the rooms is a large four-bedroom where there are four severely disabled clients. While you are in the room observing, two other staff come in, uncover, and start bathing one of the other residents without any type of privacy curtain or screen. You question staff about this. They tell you that they always close the door but don't worry about it inside the room since the clients are the same sex and not aware of their surroundings.

Survey Team Questions:

1. What areas of concern do you have?
2. If you noticed any areas, explain why you are concerned.
3. How would you continue to investigate your concerns?
4. Do you think there will be potential deficiencies cited? Defend your answer.

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Preceptor Answer Sheet

1. What areas of concern do you have?
 - Patient's right to privacy and dignity
 - Potential infection control issues
 - Areas of concern include segregating individuals based on physical disabilities, staff training, program implementation, lack of privacy and dignity, staff convenience, and appropriate bathing facilities.

2. If you noticed any areas, explain why you are concerned.
 - Four clients all sharing the same bedroom: consider possible physical environment issues with size and space.
 - Not drawing the privacy curtain violates the client's privacy and can impact their dignity.
 - Correct administration of medications through tube
 - There is concern because individuals are not being provided with privacy and are not being treated with respect and dignity.

3. How would you continue to investigate your concerns?
 - Follow up with staff interview by asking, "If there are two people in the room, would you close the door or the curtain? Do you ever close the door or the curtain when providing care to clients?"
 - Observe other staff members and clients to see if the practice is the same for all clients or only specific clients or only specific staff members. (Consider: Is this a day shift practice where staff is very busy trying to get clients out the door?)
 - Observe the administration of medications through the tube for potential infection control issues.
 - Additional observations and interviews with direct care staff should be conducted including an environmental review of the facility's bathrooms. Record review should include the comprehensive functional assessment, the IPP, and bathing programs. Policies related to staff training and conduct should be reviewed as well as the employees' personnel records.

4. Do you think there will be potential deficiencies cited? Defend your answer.
 - W406
 - W129
 - W125 as it relates to overall system of client protections for rights
 - W455 as it relates to potential infection control issues
 - W409 as it relates to at least one outside wall

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- W412 as it relates to at least 60 square feet per client in multiple client bedrooms
- W130 as it relates to privacy during care of personal needs
- W149 as it relates to neglect (failing to provide necessary services)
- W152 as it relates to prohibiting employment of individuals with a prior employment history of abuse, neglect, or mistreatment
- W189, W190, and W194 as they relate to staff training
- W249 as it relates to implementing training programs
- W267, W268, and W269 as they relate to staff conduct and prompting growth, development, and independence
- W408 as it relates to segregating individuals based on physical disabilities
- W424 as it relates to bathing facilities to meet individuals' needs