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S9999	Final Observations Statement of Licensure Violations: 300.610a) 300.1210a) 300.1210b) 300.1210d)2)3) 300.1810h) 300.3220f) Section 300.610 Resident Care Policies a) The facility shall have written policies and procedures governing all services provided by the facility. The written policies and procedures shall be formulated by a Resident Care Policy Committee consisting of at least the administrator, the advisory physician or the medical advisory committee, and representatives of nursing and other services in the facility. The policies shall comply with the Act and this Part. The written policies shall be followed in operating the facility and shall be reviewed at least annually by this committee, documented by written, signed and dated minutes of the meeting. Section 300.1210 General Requirements for Nursing and Personal Care a) Comprehensive Resident Care Plan. A facility, with the participation of the resident and the resident's guardian or representative, as applicable, must develop and implement a	S9999		

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comprehensive care plan for each resident that includes measurable objectives and timetables to meet the resident's medical, nursing, and mental and psychosocial needs that are identified in the resident's comprehensive assessment, which allow the resident to attain or maintain the highest practicable level of independent functioning, and provide for discharge planning to the least restrictive setting based on the resident's care needs. The assessment shall be developed with the active participation of the resident and the resident's guardian or representative, as applicable. (Section 3-202.2a of the Act)

b) The facility shall provide the necessary care and services to attain or maintain the highest practicable physical, mental, and psychological well-being of the resident, in accordance with each resident's comprehensive resident care plan. Adequate and properly supervised nursing care and personal care shall be provided to each resident to meet the total nursing and personal care needs of the resident.

d) Pursuant to subsection (a), general nursing care shall include, at a minimum, the following and shall be practiced on a 24-hour, seven-day-a-week basis:

2) All treatments and procedures shall be administered as ordered by the physician.

3) Objective observations of changes in a resident's condition, including mental and emotional changes, as a means for analyzing and determining care required and the need for further medical evaluation and treatment shall be made by nursing staff and recorded in the resident's medical record.

Section 300.1810 Resident Record Requirements

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h) Treatment sheets shall be maintained recording all resident care procedures ordered by each resident's attending physician. Physician ordered procedures that shall be recorded include, but are not limited to, the prevention and treatment of decubitus ulcers, weight monitoring to determine a resident's weight loss or gain, catheter/ostomy care, blood pressure monitoring, and fluid intake and output.

Section 300.3220 Medical Care
f) All medical treatment and procedures shall be administered as ordered by a physician. All new physician orders shall be reviewed by the facility's director of nursing or charge nurse designee within 24 hours after such orders have been issued to assure facility compliance with such orders. (Section 2-104(b) of the Act)

This REQUIREMENT is not met as evidenced by:

Deficiencies at this level require more than one deficiency practice statement.

A. Based on interview and record review the facility failed to transcribe and implement physician ordered wound treatments, failed to ensure wound supplies were provided and treatments were completed as ordered. The facility failed to accommodate a request for physician ordered wound treatments to be supplied or changed to an alternative treatment. The facility also failed to notify the provider of the facility changing the dressing orders, not transcribing/implementing Wound Physician Assistant (PA) orders, and not notifying the

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Wound PA of a resident request to change wound dressing orders for one (R1) resident out of five residents reviewed for wound care in a sample list of five residents. R1 experienced pain, embarrassment and worsening of his bilateral extremity wounds resulting in a 15-day hospitalization for the treatment of his BLE wounds and infection.

B. Based on observation, interview, and record review the facility failed to assess, monitor, notify the physician of a wound and failed to obtain treatment orders. The facility also failed to prevent cross contamination during wound care for one (R2) resident out of five residents reviewed for wound care in a sample list of five residents.

Findings include:

A. R1's undated Face Sheet documents admitted to the facility on 9/7/24 and lists R1's medical diagnoses as Lymphedema, Chronic Venous Hypertension with ulcer of lower extremity, Diabetes Mellitus Type II, Parkinson's Disease, Cellulitis of Right and Left Lower Limbs, Morbid Obesity, Chronic Kidney Disease Stage 3, Acute Kidney Failure and Chronic Congestive Heart Failure.

R1's Minimum Data Set (MDS) dated 1/16/25 documents R1 as cognitively intact. This same MDS documents R1 as requiring supervision with bathing and putting on and removing footwear.

R1's care plan intervention dated 9/19/24 instructs staff to Keep skin clean and dry. 9/19/24 Follow facility policies/protocols for the prevention/treatment of skin breakdown.

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R1's Physician Order Sheet (POS) dated December 15-31, 2024, January 1-31, 2025, and February 1-20, 2025, document physician orders to cleanse R1's bilateral lower extremities (BLE) with soap and water, apply zinc to peri wound, (Brand name dressing used to absorb wound drainage) with silver to open wounds, cover with (Brand name compression bandage system) twice per week and as needed. Once (Brand name compression bandage system) is tolerated, then change to weekly if drainage slows and dressing is intact.

R1's Physician Order Sheet (POS) dated February 21-28 documents a physician order to cleanse R1's BLE with soap and water, apply (Brand name petroleum impregnated gauze) soaked gauze to open areas, (Brand name semi-rigid compression bandage), zinc oxide to peri wound then wrap with dry gauze from mid foot to high calf with compression gauze twice per week and as needed.

R1's Wound Assessment and Plan dated 1/2/25, 1/9/25, 1/23/25 documents a physician order to cleanse R1's BLE, apply Zinc oxide to peri wound, apply (Brand name dressing used to absorb wound drainage) Silver followed by two- or four-layer compression wraps depending on what is available twice per week or sooner if dressings are saturated and as needed.

R1's Wound Assessment and Plan dated 1/30/25 document a physician order to cleanse R1's BLE, apply Zinc Oxide to peri wounds, apply (Brand name petroleum impregnated gauze) cut to fit to open areas, cover with absorbent gauze, two- or three-layer compression wraps depending on what is available three times per week or sooner

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if dressings are saturated and as needed. This same plan documents R1's newly acquired Right and Left Dorsal open areas to cleanse, apply Calcium Alginate, cover with absorbent pad, and wrap daily and as needed.

R1's Wound Assessment and Plan dated 2/6/25 and 2/20/25 documents a physician order to cleanse R1's BLE, apply Zinc Oxide to peri wounds, apply (Brand name petroleum impregnated gauze) cut to fit to open areas, cover with absorbent gauze, two- or three-layer compression wraps depending on what is available three times per week or sooner if dressings are saturated and as needed. This same plan documents in addition to R1's BLE dressing orders the facility is to provide (Brand name semi-rigid compression bandage) when available, Calcium Alginate and compression wraps three times per week or sooner if saturated.

R1's Wound Assessment and Plan dated 3/13/25 documents a physician order to cleanse R1's BLE and bilateral dorsal feet, apply Zinc Oxide to peri wounds, apply absorbent gauze, wrap with dry gauze and then compression gauze three times per week and as needed.

R1's Skin Evaluation Assessment dated 3/14/25 documents R1's Left Lower Extremity (LLE) Cellulitis/Venous Lymphedema wounds measuring 22.0 centimeters (cm) long by the entire circumference of R1's LLE by 0.1 cm deep as macerated with heavy serosanguinous drainage that is painful to R1. This same assessment documents R1's Right Lower Extremity (RLE) Cellulitis/Venous Lymphedema wounds measuring 20.0 centimeters (cm) long by the entire circumference of R1's RLE by 0.2 cm

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deep as macerated with heavy serosanguinous drainage that is painful to R1. This same assessment lists R1's Right Dorsal Foot open lesion measures 6.0 cm long by 6.0 cm wide by 0.1 cm deep as macerated with moderate serosanguinous drainage and R1's Left Dorsal Foot open lesion measures 8.0 cm long by 8.0 cm wide by 0.1 cm deep as macerated with minimal serosanguinous drainage.

R1's Final Culture and Sensitivity report dated 2/9/25 documents R1's Right Leg culture showed Proteus Mirabilis, Providencia Stuartii, Stenotrophomonas Maltophilia and Diptheroids.

The undated facility Sign Out/Acceptance of Responsibility for Leave of Absence form documents R1 signed himself out on 3/16/25 at 9:30 PM. This same form documents R1's destination was to the hospital.

R1's Nurse Progress Note dated 3/16/25 at 9:54 PM documents R1 signed himself out at 9:30 PM to go to the emergency room for bilateral lower extremity (BLE) pain. This same note documents R1 stated he can't stand the pain anymore. R1's Nurse Progress Note dated 3/17/25 at 1:44 AM documents the hospital called to report to the facility R1 was being admitted to the hospital for BLE wounds.

R1's Hospital Records document R1 had multiple ulcers stage 2 through 3 on both lower legs, the rest of the affected area on both lower legs had Moisture Associated Skin Dermatitis (MASD). This same report documents R1's dressings were saturated and R1's bilateral lower legs were weeping. R1's Hospital Record dated 3/16/25 documents R1 as wearing garbage bags around his legs and plastic booties, for which he is sitting

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in about two inches of yellow serous fluid from his legs. This same record documents R1's extremities show no cyanosis, claudication with +4 bilateral lower extremity and pedal, extensive weeping consistent with his Lymphedema history, multiple non-healing venous stasis wounds, macerated tissue to the Left foot and ankle. This same record documents "(R1's) dressings are saturated through and he is dressed with plastic bags over his wound dressings. R1) is not getting appropriate wound management for not only his Cellulitis and nonhealing wounds but also his Lymphedema. (R1's) Bilateral lower extremities are erythematous and edematous. Multiple scattered shallow full-thickness skin loss noted. Most of the wound beds are red and moist. There is a wound on the Right Lower Leg that has a small amount of slough noted. There is a large amount of serosanguinous drainage present. Scattered areas of maceration noted. Circumference of the right calf is 51 centimeters (cm). Circumference of the left calf is 53 cm."

On 4/2/25 at 8:30 AM V10 (Licensed Practical Nurse/LPN) stated R1 complained of pain on 3/16/25 to his BLE. V10 stated she administered pain medication to R1. V10 stated R1 asked for more pain medication 20 minutes later and she instructed R1 to give the pain medication time to work. V10 stated R1 reported he was 'in too much pain that he could not stand it'. V10 stated R1 would occasionally refuse dressing changes if the facility did not have the appropriate dressings. V10 stated R1 had a friend take him to the hospital that night (3/16) and he was admitted for the treatment of his wounds. V10 stated she did not have a chance to change R1's dressings that evening.

On 4/3/25 at 9:45 AM R1 stated the facility did not

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follow the physician orders for his dressing changes to his BLE. R1 stated he had asked for V11 (Wound Physician Assistant/PA) to be called and asked for a different type of dressing and was told the facility does not have a way to contact V11. R1 stated he was told to wear garbage bags on his lower legs to catch the drainage. R1 stated the staff would use rolled gauze to wrap his leg and then use the same gauze to tie the garbage bags onto his legs so that they would stay up.

On 4/3/25 at 10:20 AM V11 (Wound PA) stated the facility did not notify her of R1's request for different treatments, her dressing orders not being completed as ordered, the facility not having the correct wound supplies or that the facility was using garbage bags to contain the drainage. V11 stated R1 was alert and oriented and would sometimes refuse dressings. V11 stated the facility should have investigated why the dressings would be refused to prevent deterioration of R1's BLE wounds. V11 stated garbage bags should not have been used to contain wound drainage and would have caused harm to R1 by keeping the drainage next to the wounds and exposing R1's feet to unnecessary maceration due to sitting in wound drainage.

On 4/3/25 at 11:00 AM V14 (Wound Nurse/LPN/Infection Preventionist/IP) stated V11 (Wound PA) would see R1 weekly and change his dressing orders according to what R1 would agree to. V14 stated many time the dressing order was changed but V14 did not change the order in the computer due to being told by the corporation that R1's specific types of dressings were too costly and could not be ordered. V14 stated she did not reach out to V11 (Wound PA) to report the dressings were not ordered and that

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R1 had been getting the wrong dressings. V14 stated R1's wounds did deteriorate during his stay in the facility due to the wrong dressings being put on, the staff not changing R1's dressings more frequently due to cost of the supplies and not re-approaching R1 if he did refuse to see why R1 was refusing his dressing changes.

B. R2's undated Face Sheet documents medical diagnoses as Morbid Obesity, Chronic Obstructive Pulmonary Disease (COPD), Heart Failure, Peripheral Vascular Disease, Paroxysmal Atrial Fibrillation, Chronic Venous Hypertension, Acute Nephritic Syndrome, Lymphedema, Cellulitis and Body Mass Index (BMI) greater than 70.

R2's care plan intervention dated 10/17/23 documents staff are to Monitor/document location, size, and treatment of impairment. Report abnormalities, failure to heal, signs and symptoms of infection, maceration etc. to Physician.

R2's Physician Order Sheet (POS) dated March and April 2025 does not document a treatment order for R2's open Left Elbow wound.

R2's Nurse Progress Note dated 3/24/25 documents R2 has sores on her Left Elbow/Bicep area.

On 4/2/25 at 10:30 AM R2 stated she has open sores on her Right Lower Leg due to her Lymphedema. R2 stated she has blisters on her Left Elbow area that popped. R2 stated the staff have been aware of this area for about a week but have not put any dressing on yet.

On 4/2/25 at 10:35 AM R2 was laying in her bed

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with her arms exposed, above the covers. R2's Left Elbow had two nickel sized intact blistered areas and one quarter sized open area draining clear/yellow fluid onto R2's sheets. R2's Left Elbow wounds did not have any dressing in place.

On 4/2/25 at 1:15 PM V10 (LPN) and V14 (Wound Nurse/LPN/IP) completed R2's dressing change to her Right Lower Extremity (RLE) open wounds. V10 cleansed R2's RLE, applied antibiotic ointment and Calcium Alginate rope. V10 turned away from R2 to get the absorbent gauze, then turned back and saw that R2's Calcium Alginate rope had dropped onto the towel below R2's leg. R2's Calcium Alginate rope dropped directly onto the section of R2's towel that was soiled with blood and serous fluid from R2's open wounds. V10 picked up the contaminated Calcium Alginate rope and placed it again on the wound and continued to finish the dressing change.

On 4/2/25 at 2:00 PM V10 Licensed Practical Nurse (LPN) stated she cross contaminated R2's open draining wound due to V10 saw the Calcium Alginate rope sitting in the wound drainage on the towel and continued to put that contaminated rope back on R2's open wound. V10 stated she should have gotten a new piece of rope. V10 stated cross contaminating an open wound could cause an infection.

On 4/3/25 at 2:30 PM V14 (Wound Nurse/LPN/IP) stated she was informed on 4/2/25 of R2's Left Elbow open wounds. V14 stated staff should have obtained an order for a protective dressing when this area was first observed last week (3/24/25) and then gotten an order change after it opened three days ago (3/31/25). V14 stated the facility is conducting a house wide

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training next week on wound care, following physician orders, timely reporting of any new skin areas and other areas of concern.

The facility policy titled Skin Conditioning Monitoring revised 3/16/23 documents upon notification of a skin lesion wound, or other sin abnormality, the nurse will assess and document the findings in the nurses' notes and complete a skin evaluation. The nurse will then implement the following procedure: notify the physician, obtain treatment order which includes type of treatment, location of area, frequency of how often treatment is to be performed, how area is cleansed and a stop date if needed.

The facility policy titled Dressing Change revised 3/16/23 documents staff should follow the physician order for treatments.

"A"