



*Protecting, Maintaining and Improving the Health of Minnesotans*

Certified Mail # 7008 0150 0001 1713 6581

October 8, 2008

Cynthia Buffington, Administrator  
Integrity Home Health Co  
2100 Plymouth Avenue N Suite 115  
Minneapolis, MN, 55411

Re: Results of State Licensing Survey

Dear Ms. Buffington:

The above agency was surveyed on September 9, 10, and 11, 2008, for the purpose of assessing compliance with state licensing regulations. State licensing deficiencies, if found, are delineated on the attached Minnesota Department of Health (MDH) correction order form. The correction order form should be signed and returned to this office when all orders are corrected. We urge you to review these orders carefully, item by item, and if you find that any of the orders are not in accordance with your understanding at the time of the exit conference following the survey, you should immediately contact me, or the RN Program Coordinator. If further clarification is necessary, I can arrange for an informal conference at which time your questions relating to the order(s) can be discussed.

A final version of the Licensing Survey Form is enclosed. This document will be posted on the MDH website.

Also attached is an optional Provider questionnaire, which is a self-mailer, which affords the provider with an opportunity to give feedback on the survey experience.

Please note, it is your responsibility to share the information contained in this letter and the results of this visit with the President of your facility's Governing Body.

Please feel free to call our office with any questions at (651) 201-4301.

Sincerely,

A handwritten signature in black ink that reads "Jean M. Johnston". The signature is written in a cursive style with a large, looped "J" and "N".

Jean Johnston, Program Manager  
Case Mix Review Program

Enclosures

cc: Hennepin County Social Services  
Ron Drude, Minnesota Department of Human Services  
Sherilyn Moe, Office of the Ombudsman

01/07 CMR3199

Division of Compliance Monitoring • Case Mix Review  
85 East 7th Place Suite, 220 • PO Box 64938 • St. Paul, MN 55164-0938 • 651-201-4301  
General Information: 651-201-5000 or 888-345-0823 • TTY: 651-201-5797 • Minnesota Relay Service: 800-627-3529

<http://www.health.state.mn.us>

*An equal opportunity employer*



Class A Licensed-Only Home Care Provider

LICENSING SURVEY FORM

Registered nurses from the Minnesota Department of Health (MDH) use this Licensing Survey Form during on-site visits to evaluate the care provided by Class A Licensed-Only Home Care Providers. Class A licensees may also use this form to monitor the quality of services provided to clients at any time. Licensees may use their completed Licensing Survey Form to help communicate with MDH nurses during an on-site regulatory visit.

During an on-site visit, MDH nurses will interview staff, clients and/or their representatives, make observations and review documentation. The survey is an opportunity for the licensee to describe to the MDH nurse what systems are in place to provide Class A Licensed-Only Home Care services. Completing this Licensing Survey Form in advance may facilitate the survey process.

Licensing requirements listed below are reviewed during a survey. A determination is made whether the requirements are met or not met for each Indicator of Compliance. This form must be used in conjunction with a copy of the Class A Licensed-Only Home Care regulations. Any violations of the Class A licensing requirements are noted at the end of the survey form.

Name of Class A Licensee: INTEGRITY HOME HEALTH CO

HFID #: 21793

Date(s) of Survey: September 9, 10 and 11, 2008

Project #: QL21793005

Indicators of Compliance	Outcomes Observed	Comments
<p>1. The provider accepts and retains clients for whom it can meet the needs.</p> <p><b>Focus Survey</b></p> <ul style="list-style-type: none"> <li>MN Rule 4668.0140</li> </ul> <p><b>Expanded Survey</b></p> <ul style="list-style-type: none"> <li>MN Rule 4668.0050</li> <li>MN Rule 4668.0060 Subp. 3, 4 and 5</li> <li>MN Rule 4668.0180 Subp. 8</li> </ul>	<ul style="list-style-type: none"> <li>Clients are accepted based on the availability of staff, sufficient in qualifications and numbers, to adequately provide the services agreed to in the service agreement.</li> <li>Service plans accurately describe the needs and services and contain all the required information.</li> <li>Services agreed to are provided Clients are provided referral assistance.</li> </ul>	<p><b>Focus Survey</b></p> <p><input type="checkbox"/> Met</p> <p><input type="checkbox"/> Correction Order(s) issued</p> <p><input type="checkbox"/> Education Provided</p> <p><b>Expanded Survey</b></p> <p><input checked="" type="checkbox"/> Survey not Expanded</p> <p><input type="checkbox"/> Met</p> <p><input checked="" type="checkbox"/> Correction Order(s) issued</p> <p><input checked="" type="checkbox"/> Education Provided</p> <p><b>Follow-up Survey #</b> _____</p> <p><input type="checkbox"/> New Correction Order issued</p> <p><input type="checkbox"/> Education Provided</p>

Indicators of Compliance	Outcomes Observed	Comments
<p>2. The provider promotes client rights.</p> <p><b>Focus Survey</b></p> <ul style="list-style-type: none"> <li>• MN Rule 4668.0030</li> <li>• MN Statute §144A.44</li> </ul> <p><b>Expanded Survey</b></p> <ul style="list-style-type: none"> <li>• MN Rule 4668.0040</li> <li>• MN Rule 4668.0170</li> </ul>	<ul style="list-style-type: none"> <li>• Clients’ are aware of and have their rights honored.</li> <li>• Clients’ are informed of and afforded the right to file a complaint.</li> </ul>	<p><b>Focus Survey</b></p> <p><input checked="" type="checkbox"/> Met</p> <p><input type="checkbox"/> Correction Order(s) issued</p> <p><input checked="" type="checkbox"/> Education Provided</p> <p><b>Expanded Survey</b></p> <p><input checked="" type="checkbox"/> Survey not Expanded</p> <p><input type="checkbox"/> Met</p> <p><input type="checkbox"/> Correction Order(s) issued</p> <p><input type="checkbox"/> Education Provided</p> <p><b>Follow-up Survey #</b> <input type="checkbox"/></p> <p><input type="checkbox"/> New Correction Order issued</p> <p><input type="checkbox"/> Education Provided</p>
<p>3. The provider promotes and protects each client’s safety, property, and well-being.</p> <p><b>Focus Survey</b></p> <ul style="list-style-type: none"> <li>• MN Statutes §144A.46 Subd. 5(b)</li> <li>• MN Statute §626.556</li> <li>• MN Statutes §626.557</li> </ul> <p><b>Expanded Survey</b></p> <ul style="list-style-type: none"> <li>• MN Rule 4668.0035</li> </ul>	<ul style="list-style-type: none"> <li>• Client’s person, finances and property are safe and secure.</li> <li>• All criminal background checks are performed as required.</li> <li>• Clients are free from maltreatment.</li> <li>• There is a system for reporting and investigating any incidents of maltreatment.</li> <li>• Maltreatment assessments and prevention plans are accurate and current.</li> </ul>	<p><b>Focus Survey</b></p> <p><input type="checkbox"/> Met</p> <p><input checked="" type="checkbox"/> Correction Order(s) issued</p> <p><input checked="" type="checkbox"/> Education Provided</p> <p><b>Expanded Survey</b></p> <p><input checked="" type="checkbox"/> Survey not Expanded</p> <p><input type="checkbox"/> Met</p> <p><input type="checkbox"/> Correction Order(s) issued</p> <p><input type="checkbox"/> Education Provided</p> <p><b>Follow-up Survey #</b> <input type="checkbox"/></p> <p><input type="checkbox"/> New Correction Order issued</p> <p><input type="checkbox"/> Education Provided</p>
<p>4. The provider maintains and protects client records.</p> <p><b>Focus Survey</b></p> <ul style="list-style-type: none"> <li>• MN Rule 4668.0160</li> </ul> <p><b>Expanded Survey</b></p> <p>[Note: See Informational Bulletin 99-11 for Class A variance for Electronically Transmitted Orders.</p>	<ul style="list-style-type: none"> <li>• <b>Client records are maintained and retained securely.</b></li> <li>• <b>Client records contain all required documentation.</b></li> <li>• Client information is released only to appropriate parties.</li> <li>• Discharge summaries are available upon request.</li> </ul>	<p><b>Focus Survey</b></p> <p><input checked="" type="checkbox"/> Met</p> <p><input type="checkbox"/> Correction Order(s) issued</p> <p><input checked="" type="checkbox"/> Education Provided</p> <p><b>Expanded Survey</b></p> <p><input type="checkbox"/> Survey not Expanded</p> <p><input type="checkbox"/> Met</p>

Indicators of Compliance	Outcomes Observed	Comments
<p>Non-compliance with this variance will result in a correction order issued under 4668.0016.]</p>		<p>___ Correction Order(s) issued ___ Education Provided <b>Follow-up Survey #</b> ___ ___ New Correction Order issued ___ Education Provided</p>
<p>5. The provider employs and/or contracts with qualified and trained staff.</p> <p><b>Focus Survey</b></p> <ul style="list-style-type: none"> <li>• MN Rule 4668.0100</li> <li>• [Except Subp. 2]</li> <li>• MN Rule 4668.0065</li> </ul> <p><b>Expanded Survey</b></p> <ul style="list-style-type: none"> <li>• MN Rule 4668.0060 Subp. 1</li> <li>• MN Rule 4668.0070</li> <li>• MN Rule 4668.0075</li> <li>• MN Rule 4668.0080</li> <li>• MN Rule 4668.0130</li> <li>• MN Statute §144A.45 Subd. 5</li> </ul> <p>[Note: See Informational Bulletin 99-7 for Class A variance in a Housing With Services Setting. Non-compliance with this variance will result in a correction order issued under 4668.0016.]</p>	<ul style="list-style-type: none"> <li>• Staff, employed or contracted, have received all the required training.</li> <li>• Staff, employed or contracted, meet the Tuberculosis and all other infection control guidelines.</li> <li>• Personnel records are maintained and retained.</li> <li>• Licensee and all staff have received the required Orientation to Home Care.</li> <li>• Staff, employed or contracted, are registered and licensed as required by law.</li> <li>• Documentation of medication administration procedures are available.</li> <li>• Supervision is provided as required.</li> </ul>	<p><b>Focus Survey</b></p> <p>___ Met <input checked="" type="checkbox"/> Correction Order(s) issued <input checked="" type="checkbox"/> Education Provided</p> <p><b>Expanded Survey</b></p> <p><input checked="" type="checkbox"/> Survey not Expanded ___ Met ___ Correction Order(s) issued ___ Education Provided</p> <p><b>Follow-up Survey #</b> ___ ___ New Correction Order issued ___ Education Provided</p>
<p>6. The provider obtains and keeps current all medication and treatment orders [if applicable].</p> <p><b>Focus Survey</b></p> <ul style="list-style-type: none"> <li>• MN Rule 4668.0150</li> </ul> <p><b>Expanded Survey</b></p> <ul style="list-style-type: none"> <li>• MN Rule 4668.0100 Subp. 2</li> </ul> <p>[Note: See Informational Bulletin 99-7 and 04-12 for Class A variance in a Housing With Services setting with regards to medication administration, storage</p>	<ul style="list-style-type: none"> <li>• Medications and treatments administered are ordered by a prescriber.</li> <li>• Medications are properly labeled.</li> <li>• Medications and treatments are administered as prescribed.</li> <li>• Medications and treatments administered are documented.</li> <li>• Medications and treatments are renewed at least every three months.</li> </ul>	<p><b>Focus Survey</b></p> <p>___ Met ___ Correction Order(s) issued ___ Education Provided</p> <p><b>Expanded Survey</b></p> <p>___ Survey not Expanded ___ Met <input checked="" type="checkbox"/> Correction Order(s) issued <input checked="" type="checkbox"/> Education Provided</p> <p><b>Follow-up Survey #</b> ___ ___ New Correction</p>

Indicators of Compliance	Outcomes Observed	Comments
and disposition. Non-compliance with this variance will result in a correction order issued under 4668.0016.]		Order issued ___ Education Provided
7. The provider is licensed and provides services in accordance with the license.  <b>Focus Survey</b> <ul style="list-style-type: none"> <li>• MN Rule 4668.0019</li> </ul> <b>Expanded Survey</b> <ul style="list-style-type: none"> <li>• MN Rule 4668.0008 Subp. 3</li> <li>• MN Rule 4668.0012</li> <li>• MN Rule 4668.0060 Subp. 2 and 6</li> <li>• MN Rule 4668.0180</li> <li>• MN Rule 4668.0220</li> </ul> <p><small>Note: MDH will make referrals to the Attorney General's office for violations of MN Statutes 144D or 325F.72; and make other referrals, as needed.</small></p>	<ul style="list-style-type: none"> <li>• Language requiring compliance with Home Care statutes and rules is included in contracts for contracted services.</li> <li>• License is obtained, displayed, and renewed.</li> <li>• Licensee's advertisements accurately reflect services available.</li> <li>• Licensee provides services within the scope of the license.</li> <li>• Licensee has a contact person available when a para-professional is working.</li> </ul>	<b>Focus Survey</b> <input checked="" type="checkbox"/> Met ___ Correction Order(s) issued <input checked="" type="checkbox"/> Education Provided  <b>Expanded Survey</b> <input checked="" type="checkbox"/> Survey not Expanded ___ Met ___ Correction Order(s) issued ___ Education Provided  <b>Follow-up Survey #</b> ___ ___ New Correction Order issued ___ Education Provided
8. The provider is in compliance with MDH waivers and variances.  <b>Expanded Survey</b> <ul style="list-style-type: none"> <li>• MN Rule 4668.0016</li> </ul>	<ul style="list-style-type: none"> <li>• Licensee provides services within the scope of applicable MDH waivers and variances</li> </ul>	<p><i>This area does not apply to a Focus Survey.</i></p> <b>Expanded Survey</b> <input checked="" type="checkbox"/> Survey not Expanded ___ Met ___ Correction Order(s) issued <input checked="" type="checkbox"/> Education Provided  <b>Follow-up Survey #</b> ___ ___ New Correction Order issued ___ Education Provided

***Please note:*** Although the focus of the licensing survey is the regulations listed in the Indicators of Compliance boxes above, other rules and statutes may be cited depending on what system a provider has or fails to have in place and/or the severity of a violation. The findings, of the focused survey may result in an expanded survey.

**SURVEY RESULTS:** \_\_\_ All Indicators of Compliance listed above were met.

For Indicators of Compliance not met, the rule or statute numbers and the findings of deficient practice are noted below.

**1. MN Rule 4668.0075 Subp. 1****INDICATOR OF COMPLIANCE: # 5**

Based on record review and interview, the licensee failed to ensure that employees who provide direct care, complete an orientation to the home care requirements before providing home care services to the clients in one of three employee (C) records reviewed. The findings include:

Employee C was hired April of 2008, and began providing services for client #1 on April of 2008. Employee C's record lacked evidence of an orientation to the home care requirements. When interviewed September 10, 2008, employee C reported he was provided with written materials to read and return. The written tests were related to communication, documentation and pressure sores. When interviewed September 10, 2008, the Director of Operations was unable to locate evidence of orientation to the home care requirements for employee C.

**2. MN Rule 4668.0100 Subp. 2****INDICATOR OF COMPLIANCE: # 6**

Based on record review and interview, the licensee failed to ensure that unlicensed personnel who administered medications to clients were competent to administer medications for one of two unlicensed personnel (C) reviewed. The findings include:

Employee C was an unlicensed employee who provided direct care to client #1 which included assistance with medications. The Home Health Aide/PCA Care Plan completed by the registered nurse (RN) June 6, 2008, indicated client #1 needed medication reminders and administration of eye drops every evening at bedtime. There were no written instructions by the RN for the administration of the eye drops.

Employee C's record lacked evidence of training for medication reminders and medication administration. When interviewed September 10, 2008, employee C reported client 1's vision was poor and he could be weak after dialysis. Employee C reported he administered client 1's oral medications and eye drops. He stated he did not receive any training or skills testing for medication administration.

When interviewed September 11, 2008, the RN was unaware of what types of training was provided to the unlicensed employee. When interviewed on September 11, 2008, the Director of Operations stated that unlicensed employee were not supposed to be administering medications.

**3. MN Rule 4668.0100 Subp. 9****INDICATOR OF COMPLIANCE: # 1**

Based on record review and interview, the licensee failed to ensure that a registered nurse (RN) supervised unlicensed personnel who performed services that required supervision for two of three clients' (#1 and #2) records reviewed. The findings include:

Services were initiated for client #1 in April of 2008, which included assistance with medications. The Home Health Aide/PCA Care Plan completed by the registered nurse (RN) June of 2008, indicated client #1 needed medication reminders and administration of eye drops every evening at bedtime. Client #1's service agreement indicated client #1 was to receive services daily and RN supervision every 60 to 120 days. When interviewed September 10, 2008, employee C, an unlicensed direct care giver stated he provided client #1 with four hours of services every day, including assistance with medications. Supervisory visits were conducted by the RN on June 24, 2008 and July 26, 2008. There was no evidence of any other supervisory or monitoring visits.

Client 2 began receiving services May of 2007 which included bathing, hygiene and medication reminders every day and as needed. RN supervisory visits were conducted on May 22, 2007, June 29, 2007, July 10, 2007, August 7, 2007, November 16, 2007, February 8, 2008 and May 14, 2008. No visits were conducted between May 15, 2008 and September 11, 2008.

When interviewed September 11, 2008, the Director of Operations confirmed that the supervisory visits should have been conducted at least every 60 days. The owner was unaware of employee C administering medications to client #1, requiring 14 day visits, and indicated she did not want unlicensed staff administering medications.

#### **4. MN Rule 4668.0130 Subp. 3**

##### **INDICATOR OF COMPLIANCE: # 5**

Based on record review and interview, the licensee failed to ensure that unlicensed persons who performed home care services successfully completed training and demonstrated competency in the required topics, for two of two unlicensed personnel (C and D) records reviewed. The findings include:

Employee's C and D began working for the agency as unlicensed direct care staff in April of 2008 and May of 2007 respectively. Their records each contained a written test dated July 23, 2008, related to observation, reporting and documentation; infection control; maintenance of a clean, safe and healthy environment; reading temperature and blood pressure; basic elements of body functioning; emergencies; falls; accidents; bathing; range of motion; incontinence; body mechanics, etc. Neither employee C nor employee D's records contained evidence of a competency evaluation by a RN.

When interviewed September 10, 2008, employee C stated he never received any direct education skill test or competency evaluation from anybody at the agency. Employee C said he was instructed to read material that was mailed to him and he completed and returned the tests to the agency's office.

When interviewed September 11, 2008, the RN stated that she was unaware of what training was provided to the unlicensed care givers. She stated she was not involved with any formalized training, other than what she would correct if she noted a problem during a supervisory visit.

When interviewed on September 11, 2008, the Director of Operations confirmed that unlicensed care givers had not received training from or supervised by an RN, and skills tests had not been conducted by an RN.

**5. MN Rule 4668.0140 Subp. 1****INDICATOR OF COMPLIANCE: # 1**

Based on record review and interview, the licensee failed to ensure that service agreements were established with a client no later than the second visit for one of two client (#1) records reviewed. The findings include:

Client 1 began receiving services on April of 2008, when care/time sheets indicated daily services were begun by the agencies unlicensed care staff. The initial service agreement was not written and signed until June of 2008. When interviewed September 11, 2008, the registered nurse stated she established the service agreement on her first visit with client #1 after she was hired in March of 2008. When interviewed on September 11, 2008, the Director of Operations was unaware of a service agreement being established prior to June 6, 2008.

**6. MN Rule 4668.0140 Subp. 2****INDICATOR OF COMPLIANCE: # 1**

Based on record review, the licensee failed to ensure that service agreements were complete for two of two client (#1 and #2) records reviewed. The findings include:

Client #1 and #2's service agreements dated June of 2008, and May of 2007 respectively, lacked the fees for services. When interviewed on September 11, 2008, the owner confirmed the fees were lacking.

**7. MN Rule 4668.0150 Subp. 3****INDICATOR OF COMPLIANCE: # 6**

Based on record review and interview, the agency failed to have a current prescriber order for medications being administered for one of two clients' (#1) records reviewed.

On June 6, 2008, the registered nurse (RN) listed client #1's oral medications, insulin and prednisone eye drops, on a medication profile. The RN provided written instructions on the plan of care directing the unlicensed caregiver to provide medication reminders and to administer the eye drops each evening at bedtime. The unlicensed staff time sheets and an interview with employee C, client #1's caregiver, September 10, 2008, confirmed that employee C administered medications to client #1 daily. The record did not contain orders for any medications.

When interviewed on September 11, 2008, the RN stated she did not recall client #1's medications, or the instructions provided to the unlicensed staff. When interviewed on September 11, 2008, the

Director of Operations stated that the unlicensed caregivers were not to administer medications to clients as a job duty.



**8. MN Statute §144A.46 Subd. 5(b)****INDICATOR OF COMPLIANCE: # 3**

Based on record review and interview, the licensee failed to ensure that background studies were performed for one of one licensed employee (B) record reviewed. The findings include:

Employee worked as a licensed direct care staff for the licensee. Employee B's record did not identify her exact date of hire. When interviewed on September 10, 2008, employee B stated she was hired in March of 2008. Her record lacked evidence of a background study being performed. When interviewed on September 10, 2008, the Director of Operations stated she was unable to locate the background study on employee B.

**9. MN Statute §626.557 Subd. 14(b)****INDICATOR OF COMPLIANCE: # 3**

Based on record review and interviews, the licensee failed to ensure that individual abuse prevention plans were established for each vulnerable adult receiving services from the home health agency in two of two client records reviewed (#1 and #2). The findings include:

Client #1 had a diagnosis of Diabetes Mellitus and received dialysis. Client #1's record lacked an individualized assessment and abuse prevention plan. Client #2 had left sided weakness and memory impairment following a stroke. Client #2's record lacked an individualized assessment and abuse prevention plan.

When interviewed September 11, 2008, the registered nurse confirmed she had not done assessments and abuse prevention plans for each client.

---

A draft copy of this completed form was faxed to Cynthia Buffington, Owner/Dir. of Operations, for a telephone exit conference on September 15, 2008. Any correction order(s) issued as a result of the on-site visit and the final Licensing Survey Form will be sent to the licensee. If you have any questions about the Licensing Survey Form or the survey results, please contact the Minnesota Department of Health, (651) 201-4301. After review, this form will be posted on the MDH website. CLASS A Licensed-only Home Care Provider general information is available by going to the following web address and clicking on the Class A Home Care Provider link:

<http://www.health.state.mn.us/divs/fpc/profinfo/cms/casemix.html>

Regulations can be viewed on the Internet: <http://www.revisor.leg.state.mn.us/stats> (for MN statutes)  
<http://www.revisor.leg.state.mn.us/arule/> (for MN Rules).