

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  525417	(X2) MULTIPLE CONSTRUCTION A. Building B. Wing	(X3) DATE SURVEY COMPLETED  08/19/2024
NAME OF PROVIDER OR SUPPLIER  Crossroads Care Center of Milwaukee		STREET ADDRESS, CITY, STATE, ZIP CODE  3216 W Highland Blvd Milwaukee, WI 53208	

For information on the nursing home's plan to correct this deficiency, please contact the nursing home or the state survey agency.

(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (Each deficiency must be preceded by full regulatory or LSC identifying information)
<p>F 0880</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Many</p>	<p>Provide and implement an infection prevention and control program.</p> <p><b>**NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDENTIALITY** 47094</b></p> <p>Based on interviews and record review, the facility did not implement their water management plan based upon current standards of practice, designed to provide a safe environment and to help prevent the development and transmission of waterborne pathogens. This deficient practice has the potential to affect all 64 residents.</p> <p>The facility's water heating system stopped working on 8/10/2024. The facility was without hot water from 8/10/2024 - 8/15/2024.</p> <p>~The facility did not call a contracted company to come to the facility to assess the concern until 8/12/2024 and the contracted company did not get to the facility until 8/14/2024 to assess and fix the concern.</p> <p>~Water temperatures and testing were not completed during the time the water heater system was not working (8/10/2024 - 8/14/2024) and the facility did not take corrective actions when control limits were not met.</p> <p>Findings include:</p> <p>The 7/6/18 revised CMS (Centers for Medicaid and Medicare Services) Quality, Safety and Oversight Letter 17-30 titled, Requirement to Reduce Legionella Risk in Healthcare Facility Water Systems to Prevent Cases and Outbreaks of Legionnaires' Disease (LD) states:</p> <p>Facilities must have water management plans and documentation that, at a minimum, ensure each facility:</p> <ul style="list-style-type: none"> <li>- Conducts a facility risk assessment to identify where Legionella and other opportunistic waterborne pathogens (e.g. Pseudomonas, Acinetobacter, Burkholderia, Stenotrophomonas, nontuberculous mycobacteria, and fungi) could grow and spread in the facility water system.</li> <li>- Develops and implements a water management program that considers the ASHRAE (American Society of Heating, Refrigerating and Air-Conditioning Engineers) industry standard and the CDC (Centers for Disease Control) toolkit</li> <li>- Specifies testing protocols and acceptable ranges for control measures, and document the results of testing and corrective actions taken when control limits are not maintained.</li> </ul> <p>(continued on next page)</p>

Any deficiency statement ending with an asterisk (\*) denotes a deficiency which the institution may be excused from correcting providing it is determined that other safeguards provide sufficient protection to the patients. (See instructions.) Except for nursing homes, the findings stated above are disclosable 90 days following the date of survey whether or not a plan of correction is provided. For nursing homes, the above findings and plans of correction are disclosable 14 days following the date these documents are made available to the facility. If deficiencies are cited, an approved plan of correction is requisite to continued program participation.

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE	TITLE	(X6) DATE
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<p>F 0880</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Many</p>	<p>- Maintains compliance with other applicable Federal, State and local requirements</p> <p>The 6/24/21 CDC Toolkit titled Developing a Water Management Program to Reduce Legionella Growth &amp; Spread in Buildings identifies the key elements of a water management program for healthcare facilities to include:</p> <ol style="list-style-type: none"> <li>1. Establish a water management program team</li> <li>2. Describe the building water systems using text and flow diagrams</li> <li>3. Identify areas where Legionella could grow and spread</li> <li>4. Describe where control measures should be applied and how to monitor them</li> <li>5. Establish ways to intervene when control limits are not met</li> <li>6. Make sure the program is running as designed and is effective</li> <li>7. Document and communicate all the activities</li> </ol> <p>The facility policy entitled Water Management Plan (WMP)- Legionella Bacteria Risk Management dated 8/22/2023 documents: . To ensure the safety of [Facility name] patients, visitors, and employees by defining the processes by which [Facility name] manages the safety of its building water systems, the plan is inclusive of all requirements associated with industry best practice for safely managing portable and utility water systems. Verification of plan execution and environmental sampling validation will be reported through the water management team recurring meetings.</p> <p>EXECUTION of HACCP (Hazard Analysis and Critical Control Points) WATER MANAGEMNT PROGRAM PRINCIPALS .</p> <ol style="list-style-type: none"> <li>2- Identify critical control points (CCP).</li> <li>3- Establish control limits for each CCP.</li> <li>4- Establish a monitoring plan for each CCP.</li> <li>5- Establish corrective actions for each CCP.</li> </ol> <p>Processing step: .</p> <ol style="list-style-type: none"> <li>2. Hot water tank and /or hot water storage, mixing valve: Potential growth of microorganisms in heating systems.</li> </ol> <p>HIGH RISK: There is potential for microbial growth at the heating step. This is reduced at temperatures &gt; (greater than) 124 degrees Fahrenheit. Adjust temperature to provide further microbiological control</p> <p>(continued on next page)</p>		

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<p>F 0880</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Many</p>	<p>4. Hot water distribution-manual and electronic faucets/showers and hoses / water hammer arrestors / pipes, valves, and fittings / aerators / faucet flow restrictors: Microbial growth in the potable water distribution system which could be transmitted by sink faucets and showers. HIGH RISK: The hot water system is extensive and complex. There is potential for 15-20 degree Fahrenheit temperature drops after the hot water supply leaves the hot water heaters which can bring the water into prime temperature ranges for microbial growth (105 - 112 degree Fahrenheit). Along with these favorable temperatures for microbial growth, there is potential for free chlorine residuals to dissipate and leave the hot water system with low level of control. The factors for growth in conjunction with the potential for water to be aerosolized present a high risk at this processing step.</p> <p>On 8/19/2024, at 9:21 AM, Surveyor interviewed Nursing Home Administrator (NHA)-A who stated when NHA-A came back from vacation on 8/12/2024 the facility did not have hot water. NHA-A contacted an outside company via email on 8/13/2024 because the outside company was not coming to the facility per phone request. NHA-A stated the outside company was not aware the facility was without hot water and the outside company came to the facility on [DATE] and 8/15/2024. NHA-A stated the facility had hot water again the morning of 8/15/2024. Surveyor asked NHA-A what control measures were implemented once the facility was without hot water for staff and residents. NHA-A stated residents got sponge baths with body wipes or water from the faucets, residents were able to choose which they preferred. NHA-A stated that heating up the water in the microwave was encouraged, but not always feasible. Surveyor asked NHA-A when the loss of hot water was reported. NHA-A stated NHA-A was on vacation, but it was reported to maintenance on 8/10/2024. Surveyor requested to review the facility's water management plan, and maintenance logs for water monitoring/testing.</p> <p>On 8/19/2024, at 12:00 PM, NHA-A stated the facility's boiler system gets inspected every three years and the last it was inspected was 6/28/2023 and due next around 7/31/2025. NHA-A stated on 8/5/2024 maintenance was alerted by staff regarding a smell of gas in the facility. [gas company] was called out and the gas was turned off by [gas company] for inspection. NHA-A stated it was noted there was not a concern of a gas leak but a venting issue in the pipes due to corrosion. NHA-A state the [gas company] turned the facility's gas back on and no further concerns were noted. Surveyor asked how often water temperatures are checked. NHA-A stated NHA-A believed water temps are checked weekly and random rooms are tested .</p> <p>Surveyor reviewed the logbook for water temperatures and noted water temperatures were last tested on [DATE] and not again until 8/16/2024, before the loss of hot water and not until after the hot water was restored. Surveyor reviewed the logs for temperature monitoring of the water heaters (5 water heater tanks, 3 tanks for the facility and 2 for the kitchen and laundry) and noted temperatures were not documented for 8/11/2024 - 8/14/2024. The last recorded temperature for the facility's water heaters (all 5 water heaters) was 80 degrees Fahrenheit on 8/10/2024. Surveyor noted that there was no additional testing done during the timeframe the hot water was noted to be off.</p> <p>(continued on next page)</p>		

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<p>F 0880</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Many</p>	<p>On 8/19/2024, at 1:12 PM, Surveyor interviewed Maintenance Director (MD)-C who stated MD-C was not made aware that the facility did not have hot water until 8/10/2024. MD-C stated MD-C monitors and documents temperatures for the water heaters everyday Monday through Friday, and tests water temperatures in random rooms biweekly so water temperatures would not have been due during the time the hot water was not working. Surveyor asked MD-C if any monitoring was being done for the hot water during the time the hot water was off. MD-C stated MD-C was not sure why temperatures would have to be monitored because the hot water was not working, it was going to be cold. MD-C stated there was not really anything the facility could do, just call [outside company] company, the facility does not have back up water heaters. MD-C stated no additional temperatures were taken, the water would have been around 70 degrees Fahrenheit.</p> <p>Surveyor notes the Facility did not increase control measures such as increased flushing of the water system when they were made aware the hot water heaters were not maintaining temperatures.</p> <p>Surveyor requested a timeline of when the [outside company] first came to the facility for the hot water concern.</p> <p>On 8/19/2024, at 3:00 PM, NHA-A stated the following timeline:</p> <ul style="list-style-type: none"> <li>- On 8/5/2024, there was smell of potential gas in the facility, [gas company] came out to assess. Noted no gas leak concern, but concern noted in venting.</li> <li>- On 8/9/2024, [outside company] came to assess and gave a quote to fix the venting/pipe issues that were found by [gas company]. NHA-A stated at that time, there were no concerns regarding issues with the hot water and temperature logs documented all temperatures were within range.</li> <li>- On 8/10/2024, MD-C was notified the facility did not have hot water.</li> <li>- On 8/12/2024, [outside company] was contact via phone and message left about facility concern with having no hot water.</li> <li>- On 8/13/2024, [outside company] contacted via e-mail by NHA-A regarding the immediate need of [outside company] needing to go to facility and assess due to no hot water in the facility. [Outside company] notified NHA-A they were not aware of the immediacy and would be out to facility on 8/14/2024.</li> <li>- On 8/14/2024, [outside company] at facility to assess and noted will need to work on water system 8/15/2024 as well due to issue being more extensive.</li> <li>- On 8/15/2024 on the AM, the facility had hot water again.</li> </ul> <p>On 8/19/2024, at 3:30 PM, Surveyor shared concerns with NHA- A that the [outside company] was not contact until 8/12/2024 (2 days after the facility was without hot water) and [outside company] did not get into the building to assess the concern until 8/14/2024 (4 days later) and hot water was not restored until 8/15/24. Surveyor also shared the concern the facility did not identify the increased risk for waterborne pathogens due to the drop in water temperatures which can be favorable for microbial growth, or the potential for chlorine residuals to dissipate and leave the hot water system with low level of risk control.</p>		