

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: 525549	(X2) MULTIPLE CONSTRUCTION A. Building B. Wing	(X3) DATE SURVEY COMPLETED 07/25/2024
NAME OF PROVIDER OR SUPPLIER Heritage Square Health Care Center		STREET ADDRESS, CITY, STATE, ZIP CODE 5404 W Loomis Rd Greendale, WI 53129	

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 0837</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Many</p>	<p>Establish a governing body that is legally responsible for establishing and implementing policies for managing and operating the facility and appoints a properly licensed administrator responsible for managing the facility.</p> <p>**NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDENTIALITY** 25698</p> <p>Based upon interview and record review, the facility's governing body failed to fulfill the responsibilities of the governing body to include establishing an implementing policies and procedures regarding the operations of the facility. This has the potential to affect all 75 residents present in the facility at the time of the survey.</p> <p>The facility's governing body did not ensure contracted vendors were reimbursed and paid in accordance with established contracts or invoiced amounts causing the facility's fiscal accounts to be in arrears. This has created the likelihood where good and services necessary to maintain operations of the facility along with care and treatment of the residents may be impacted by the failures of the governing body.</p> <p>Findings include:</p> <p>The facility Governing Body policy Implemented [DATE] documents:</p> <p>The facility will have a governing body, or designated persons functioning as a governing body, that is legally responsible for establishing and implementing policies regarding the management and operation of the facility.</p> <p>Policy Explanation and Compliance Guidelines:</p> <ol style="list-style-type: none"> 1. The governing body will appoint an administrator who is: <ol style="list-style-type: none"> a. Licensed by the state where required. b. Responsible for management of the facility. c. Reports to and is accountable to the governing body. 2. The governing body is responsible and accountable for the QAPI program. <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 0837</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Many</p>	<p>3. The governing body refers to individuals such as facility owner(s), Chief Executive Officer(s), or other individuals who are legally responsible to establish and implement policies regarding the management and operations of the facility.</p> <p>4. The governing body will have a process in place by which the administrator:</p> <p>a. Reports to the governing body.</p> <p>b. Method of communication between administrator and governing body.</p> <p>c. How the governing body responds back to the administrator.</p> <p>d. What specific types of problems and information (i.e., survey results, allegations of abuse or neglect, complaints, etc.) are reported or not reported.</p> <p>e. How the administrator is held accountable and reports information about the facility's management and operation (i.e., audits, budgets, staffing supplies, etc.)</p> <p>f. How the administrator and the governing body are involved with the facility wide assessment.</p> <p>Surveyors entered the facility on [DATE] to investigate alleged concerns the governing body has not been paying accounts and amounts were owed to multiple vendors associated with the facility operations. Upon entry to the facility the census was 75. The facility is licensed for 105 residents/beds.</p> <p>On [DATE] at approximately 9:28 am Surveyors started to tour the facility including observations of the kitchen and food supplies, laundry and supplies, resident living areas and medical supplies for residents.</p> <p>On [DATE] at 12:15 PM, Surveyor asked Business Office Manager/Human Resources (BOM/HR)-C if there have been any problems with vendors delivering supplies. BOM/HR-C stated not that he was aware of. BOM/HR-C stated if there are any payment questions such as payment status, he refers them to accounts payable in New Jersey to accounts Pinnacle accounts payable (PAP)-D. Surveyor asked BOM/HR-C how invoices are handled. BOM/HR-C stated invoices are electronically submitted to Pinnacle via an email. Surveyor asked BOM/HR-C if there had been any lapses or special circumstances to getting ordered supplies. BOM/HR-C was not aware of any problems with vendors. Surveyor asked BOM/HR-C if there were any payroll issues or changes in employee benefits. BOM/HR-C stated no, and he would know if there were any problems with that. Surveyor asked BOM/HR-C if the facility uses any agency staff to fill nursing positions. BOM/HR-C stated AHS, Affordable Healthcare Staffing, is the only agency they use. Surveyor asked BOM/HR-C who (name of affordable healthcare staffing/consultant [AHSC]-E) is because multiple, different staff mentioned his name. BOM/HR-C stated AHSC-E is the purchasing director and is part of Bedrock, the company that owns the facility. BOM/HR-C stated AHSC-E is the person that approves orders that are placed after reviewing the invoices. Surveyor asked BOM/HR-C what AHSC-E's full name was. BOM/HR-C pulled up an email from AHSC-E and stated (AHSC-E) is the full name and the title on the email is AHS Purchasing and Consultant. BOM/HR-C did not know AHSC-E was not employee of Bedrock.</p> <p>(continued on next page)</p>		

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<p>F 0837</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Many</p>	<p>In an interview on [DATE] at 12:30 PM, Surveyor asked NHA-A what the process was for ordering supplies. NHA-A stated orders for supplies are due by Monday at 8:00 AM and they are submitted on Friday to meet that deadline. NHA-A stated he approves the order and then the order goes to AHSC-E who makes the final approval. NHA-A stated the food is ordered through Sysco and there is no approval process for that, the order is simply submitted. Surveyor asked NHA-A if there had been a problem getting cups from Sysco. NHA-A stated Sysco was out of stock on a specific cup, but they substituted a different cup. NHA-A stated there was an email showing the conversation about the cups that NHA-A could get to Surveyor and NHA-A supplied that email. The email documented paper hot cups were substituted for the foam cups due to not being in stock, but the foam cups were back in stock and would be supplied. NHA-A stated when maintenance puts an order in, AHSC-E will tell maintenance where to order from such as Amazon or Home Depot. NHA-A stated he gets everything he needs, and AHSC-E will get it to him overnight. Surveyor asked NHA-A who AHSC-E works for. NHA-A stated AHSC-E works for himself as a consulting company and makes sure the facility gets what it needs. NHA-A stated he had been working with AHSC-E since 2020 or 2021. Surveyor asked NHA-A if there have been any problems with payroll or health benefits for the employees. NHA-A stated no, and if there are any problems with the insurance company, they just contact them and figure out a solution.</p> <p>On [DATE] at approximately 1:14 pm Surveyor confirmed with Nursing Home Administrator (NHA)-A, AHSC-E works for Affordable Healthcare Staffing, the same agency that supplies pool/agency staff to the facility.</p> <p>On [DATE] Surveyors received a copy of a facility vendor aging report from Governing Body/Owner-F. Upon review of the report, it is documented the amounts listed are as of [DATE]. The report provided by Governing Body/Owner-F identifies approximately 65 different vendors. The vendor aging report provided to Surveyors did not include total calculated amounts outstanding but showed amounts outstanding for vendors from , d+[DATE] days to greater than 151 plus days past due.</p> <p>A sample of the identified vendors include:</p> <p>* Northwest Environmental (waste management services) - as of [DATE] the vendor aging report for the facility identifies balances of \$1,202.65 as being ,d+[DATE] days outstanding from [DATE] and \$1425.60 as , d+[DATE] days past due from [DATE]. The report has a note stating Last payment made on [DATE]. On [DATE] at approximately 11:01 am Surveyor spoke to Director of Accounts Receivable (DAR)-I. DAR-I shared the facility currently owes \$9,908.47 for services provided. DAR-I stated the billing goes back to May. On [DATE] services were shut off/held. DAR-I shared Bedrock was in breach of contract for all seven of their facilities in Wisconsin and Northwest Environmental has placed this account in collections for legal action to be pursued.</p> <p>* AlixaRx (pharmacy services) - as of [DATE] the vendor aging report for the facility identifies an amount of \$1,204,956.36 as 151 plus days outstanding for the facility. The report identifies outstanding balances from invoices going back to [DATE]. The report includes a note stating, In legal.</p> <p>In an interview on [DATE] at 9:23 AM, Director of Nursing (DON)-B stated the pharmacy vendor for the facility is MacRx. DON-B stated MacRx started about a month ago and prior to MacRx, the pharmacy vendor was AlixaRx. Surveyor asked DON-B if she knew why there was a change in pharmacies. DON-B stated she did not know except that it was a corporate decision she was not a part of. Review of the vendor aging report it is documented as of [DATE] the facility owes MacRx \$34,899.96 for an invoice dated [DATE].</p> <p>(continued on next page)</p>		

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