



February 25, 2014

Bruce Ashbaugh, Director
LIFE Lutheran Services, Inc.
840 Fifth Avenue
Chambersburg, PA 17201

RE: LIFE Lutheran Services, Inc.
License # 194150 - Regular

Dear Mr. Ashbaugh:

As a result of the Department of Aging's licensing inspection of the above named facility on 01/08/2014, five areas of non-compliance were identified. The legal entity submitted an acceptable written plan to correct each area of non-compliance. Therefore, the Department issued a Regular License, indicating compliance with applicable statutes, ordinances and regulations.

Thank you for your continued effort to provide quality older adult daily living services. If you have questions, please contact me at (717) 214-6716.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Longenecker", is written over a light blue horizontal line.

Kevin Longenecker
Director

Enclosures

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF AGING

LICENSE

This license is hereby granted to LIFE LUTHERAN SERVICES, INC.
LEGAL ENTITY

To operate LIFE LUTHERAN SERVICES, INC.
(NAME OF CENTER)

Located at 840 FIFTH AVENUE CHAMBERSBURG, PA 17201
(COMPLETE ADDRESS OF CENTER)

To provide older adult daily living services.

The total number of persons which may be served at one time may not exceed 83
(MAXIMUM CAPACITY)

Restrictions: _____

This license is granted in accordance with the Act of July 11, 1990 (P.L. 499, No. 118) and Regulations.

TITLE 6. PA CODE. CHAP. 11. OLDER ADULT DAILY LIVING CENTER Dated July 03, 1993
(NUMBER AND TITLE OF REGULATIONS)

and shall remain in effect from March 01, 2014 until February 28, 2015

unless sooner revoked for non-compliance with applicable laws and regulations.

No: 194150 - Regular



ISSUING OFFICER

NOTE: This license is issued for the above address only and is not transferable. This license should be posted in a conspicuous place in the center.

Issued On: February 25, 2014

AGL01

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER LICENSE NUMBER: 194150	(X2) MULTIPLE CONSTRUCTION A. BUILDING _____ B. WING _____	(X3) DATE SURVEY COMPLETED 01/09/2014
NAME OF PROVIDER OR SUPPLIER LIFE Lutheran Services, Inc.		STREET ADDRESS, CITY, STATE, ZIP CODE 840 FIFTH AVENUE CHAMBERSBURG, PA 17201		
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE DEFICIENCY)	(X5) COMPLETE DATE
1 000	Initial Comments A State licensure visit was completed on January 8th and 9th, 2014 and it was determined that LIFE Lutheran Services, Inc in Chambersburg, PA was not in compliance with the following requirements of 6 PA Code, Chapter 11, Older Adult Daily Living Centers regulations:	1 000	Plan of Correction is required Response to 11.33 (a): LIFE Lutheran Services 2014 In-service Calendar has been revised effective immediately (1/29/14) to include two (2) live in-services (at 2 different times to strive to increase participation) in addition to readings or on-line training via Pennsylvania Department of Aging Mandatory Abuse Reporting Requirements Units. Center Manager directed LIFE Social Work department on 2/7/14 to conduct supplemental live training on reporting requirements during the new employee orientation and regularly. Representatives of each Area Agency on Aging have committed to providing annual training to all LIFE staff on Identifying Abuse and mandatory Reporting of Abuse to meet regulation. Employee #8 has completed the Mandatory Abuse Reporting online training on 2/12/14 through the Pennsylvania Department of Aging website. See Addendum A – Revised 2014 In-service Calendar dated 1/29/2014. See Addendum A1-Completed quizzes, Employee #8.	
1 580	11.33(a) Program staff orientation and training Providers shall, using center staff persons, outside resources, or both, provide program staff persons with the following: (1) A general orientation in the following areas, within 3 months of employment. (i) The purpose and goals of older adult daily living services. (ii) The roles and responsibilities of staff members. (iii) Positive approach methods to manage behavior. (iv) Health and safety precautions, including infection control. (v) Information on fire and safety	1 580	To verify completion of mandatory annual training of Reporting of Abuse, the Human Resources Department initiated an audit process on 2/7/14. The Clinical Education Instructor is tasked to conduct a quarterly audit and monitor that all education requirements are completed and entered into each individual	

AUTHORIZED PROVIDER REPRESENTATIVE'S SIGNATURE

Bruce Ashbaugh

TITLE

DIRECTOR

(X6) DATE

2/12/14

DEPARTMENT OF AGING APPROVAL

[Signature]

DATE

Chief, Division of Licensing

2/24/14

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1 580	Continued From page 1 measures/codes. (vi) The philosophy of the program and, if applicable, the parent organization. (vii) Confidentiality. (viii) Interdisciplinary team approach. (ix) Client rights. (x) The population served. (xi) The center's policies and regulations. (xii) Communication skills. (xiii) The center's emergency procedures. (2) Training in the following areas, within 3 months of employment and annually thereafter regarding: (i) The needs of the clients in the center's target population. (ii) Body mechanics/transfer techniques. (iii) Voluntary reporting laws regarding abuse, neglect and exploitation. (iv) Positive approach methods to manage behavior.	1 580	staff training record. Director of LIFE Services will assure compliance of corrective action plan by monitoring the quarterly audit. See Addendum A2 – Quarterly Training Audit Procedure for LIFE Specific Topic Training Education and Competency Procedure has been revised to assure citation is not repeated. See Addendum A3 – LIFE Specific Training Procedure.	

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1 580	Continued From page 2 (3) In addition to the general orientation and annual training required in subsection (a)(1) and (2), at least two training sessions, totaling at least 8 hours of training, per year to enhance quality of care and job performance. This STANDARD is not met as evidenced by: Findings: Based on a review of staff training records, it was determined that staff person #8 did not receive annual training in the area of mandatory reporting laws regarding abuse. Staff person #8 received training on 3/21/12 from the Area Agency on Aging and then on 10/24/13 she read a training about abuse and abuse reporting created by the Department of Public Welfare, Office of Long-Term Living. On 3/24/13 she took an online course about abuse, neglect, and exploitation but it did not cover mandatory reporting laws in Pennsylvania. All center staff must receive abuse training that covers mandatory reporting laws on an annual basis to meet the Older Adult Protective Services Act requirement.	1 580		
1 630	11.33(f) Program staff orientation and training The Department may require that centers make reasonable modifications, regarding curricula or the selection and use of trainers, in order to satisfy the	1 630		

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1 630	Continued From page 3 requirements of this section. This STANDARD is not met as evidenced by: Findings: Based on a review of staff training records and discussion with the center director, it was determined that the director and the designee did not take the director's training per the Department's mandate issued January 2013. Center directors were initially informed of this new training course on January 28, 2013, and several times subsequently, that this training must be completed by June 30, 2013.	1 630	Response to 11.33 (f): LIFE Lutheran Services leadership has completed PA Dept of Aging LTLTI Older Adult Day Services Director's Training. Certification of the LIFE Director (2/11/14), FR Center Manager (1/15/14), and Clinic Supervisor (1/28/14). Certificates of completion are attached or will be forwarded to Dept of Aging as completed. See Addendums B, B1, B2 - Completed certificates. Orientation Schedule checklist sheets for new hires in the position(s) of Director of LIFE Services, LIFE Center Manager(s) and LIFE Clinic Supervisors are revised to reflect requirement of completion prior to 90 th day following employment – see Addendum B3.	
11860	11.122 Assurance of service quality A center shall take necessary and appropriate measures to assure the quality of the services, which it provides or makes available, as described in §§ 11.123 and 11.124 (relating to core services; and specialized services and additional services). These measures include: (1) Obtaining from service providers proof of licensure, certification or other approval required by the Commonwealth or the relevant specialty, or both. (2) Assuring that service providers carry professional liability insurance. This STANDARD is not met as evidenced by:	11860		

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12400	<p>Findings: During the inspection on 1/8/14 and 1/9/14 the center was asked to verify the license and insurance for the contracted LPN. The center was not able to provide this information until 3:52 pm on 1/17/14. The center must be assure that service providers carry professional liability insurance prior to the service provider providing service.</p> <p>11.192(b) Individual record</p> <p>Entries in a client's record shall be legible, dated and signed by the person making the entry.</p> <p>This STANDARD is not met as evidenced by:</p> <p>Findings: Based on a review of client records, it could not to be determined who completed the intake assessment for client #5 and client #6 because the person who completed the form did not indicate their name on the form.</p> <p>The center utilizes electronic records. The person who completed the intake assessments did not indicate in their notes in the electronic record that the intake assessment was completed and by whom.</p>	12400	<p>Response to 11.122: On 2/7/14, the Director conveyed to the LIFE Lutheran Services Contract Administrator their responsibility to ensure that upon execution of provider contracts, and prior to provision of services that all licensure, certification/registration, and proof of insurance is validated. The Contract Administrator developed a database of contract providers, with required credentialing, and will audit the database by expiration date each quarter to ensure documents are current. The data base will be completed by March 31, 2014. The Contract Administrator understands and accepts their responsibility to maintain and document compliance, and advises contractors by email, letter, and by phone that privileges to work will be suspended until current documentation is received. Director of LIFE Services will assure compliance to this corrective action plan. See Addendum C - Contract Data Base Format and verification from Contract Administrator understands and accepts responsibility.</p> <p>Response to 11.192 (b): LIFE Lutheran Services has revised the Intake Procedure to include the process of requiring a LIFE representative to sign each Level of Care Assessment (LOCA) forms. The Medical Records Technician (MRT) will review each LOCA form upon completion for</p>	

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12410	<p>11.193 Content of records</p> <p>Each client's record shall include:</p> <p>(1) Personal information including:</p> <p>(i) The name, sex, admission date, birth date and social security number of the client.</p> <p>(ii) The race, height, weight, color of hair, color of eyes and identifying characteristics.</p> <p>(iii) The language or means of communication spoken or understood by the client and the primary language used in the client's natural home, if other than English.</p> <p>(iv) Documentation of a person's designation or appointment as a responsible party, as described in 11.8 (relating to responsible party).</p> <p>(v) A photograph taken within the last 5 years.</p> <p>(2) Unusual incident reports related to the client.</p> <p>(3) Medical reports and progress notes, if any.</p> <p>(4) Intake screening forms.</p> <p>(5) Individual care plans.</p> <p>(6) Signed release of information form.</p> <p>(7) Signed enrollment agreement.</p> <p>This STANDARD is not met as evidenced by:</p> <p>Findings: Based on a review of client records, it was determined that the pictures from client #3 and client #4 are more than 5 years old. The picture for client #3 was taken on 12/1/08 and the picture for client #4 was taken on 11/1/08.</p>	12410	<p>required signatures/information prior to scanning documents into the participant electronic health record. An ink stamp will be obtained for MRT to initial and date review of document.</p> <p>See Addendum D - Intake Procedure dated 1/2014</p> <p>Addendum D1 - MRT Review Stamp</p> <p>Response to 11.193: Effective 1/29/14, LIFE Lutheran Services has revised the Participant Safety and Identification Procedure to include the process of obtaining and verifying participant identity with the taking of individual's photo. Also included in procedure is process of re-taking the participant photo every 3 years and/or when significant physical changes are evident to assure proper identification of client. The LIFE Center Manager will be responsible for the compliance of this plan.</p> <p>See Addendum E - Revised Participant Safety and Identification Procedure dated 1/2014.</p> <p>Clients #3 & #4 have had their photos retaken with time stamp indicated - See Addendum E1.</p>	

