



Annual Compliance Training for Contractors

Purpose: Pursuant to section §483.95 of the Centers for Medicare & Medicaid Services Requirements of Participation for Long Term Care Facilities, contractors who provide services under a contractual agreement must annually provide verification of compliance with the following training requirements.

Objectives of this training:

- Understand the basic rights of those served at Presbyterian Homes & Services
- Know Presbyterian Homes & Services policy regarding Vulnerable Adult
- Know the definition of abuse
- Understand reporting responsibilities in the event of suspecting abuse
- Recognize the term QAPI and its purpose
- Understand PHS Corporate Compliance program and Codes of Conduct
- Know how and why to provide a safe, sanitary, and comfortable environment and to help prevent the development and transmission of communicable diseases and infections.
- Describe Cultural Competence
- Describe Person-Centered Care
- Recognize Presbyterian Homes & Services Principles of Dementia Care
- Define common Behavioral Health Disorders in older adults

Resident Rights

All of those we serve have rights that are to be respected and protected. It is our obligation as caregivers, employees, contractors or volunteers of PHS to protect these rights and encourage the exercise of those rights. Everyone receiving care is provided a copy of the Bill of Rights when they begin care services with Presbyterian Homes & Services.

Some specific rights:

- Privacy & confidentiality of all private information
- To be treated with dignity, respect, and courtesy
- To be free from abuse & neglect
- The right to refuse services or treatments
- To receive appropriate care by trained staff
- To file a grievance or complaint

Vulnerable Adult

Law and Policy

It is our responsibility to protect and provide a safe environment for all those we serve at Presbyterian Homes & Services. Each state has their own definition of who is a Vulnerable Adult. Presbyterian Homes does not allow any abuse, neglect, or financial exploitation of any vulnerable adult.

Definitions

Abuse/Mistreatment - Abuse is the willful infliction of injury, unreasonable confinement, intimidation, or punishment with resulting physical harm, pain, or mental anguish. Willful, as used in this definition of abuse, means the individual must have acted deliberately, not that the individual must have intended to inflict harm or injury.

Abuse also includes the deprivation by an individual, including a caretaker, of goods or services that are necessary to attain or maintain physical, mental, and psychosocial well-being. All forms of abuse noted below include abuse that may or may not be facilitated or enabled through the use of technology.

It includes:

- Physical abuse
- Verbal or emotional abuse
- Sexual Abuse
- Financial Abuse
- Mental Abuse
- Involuntary isolation or confinement

Neglect- Neglect is the failure to provide goods and services necessary to avoid physical harm, pain, mental anguish, or emotional distress. It can range from ignoring a call light, not toileting when needed, to not washing a resident's face after a meal.

Neglect also includes elopement. Elopement means a resident who is not safe to leave their living space by themselves and does so. It may be that the resident leaves the building and is outside or that they leave a secure area and is wandering around a different part of the building.

Financial/Material Exploitation (Misappropriation of individual's property) – Financial/Material exploitation is defined as the illegal or improper use of an individual's funds, property or assets without informed consent and resulting in monetary, personal, or other benefit, gain or profit for the perpetrator; OR monetary or personal loss by the individual through the use of manipulation, intimidation, threats or coercion. Examples of this would be:

- Utilizing a position of authority to take advantage of an individual for personal gain
- Stealing, cashing of checks without permission, forging signatures, misusing money, possessions or belongings of those we care for
- Improper use of conservatorship, guardianship, or power of attorney

Injuries of Unknown Origin - The source of the injury was not observed by any person or the source of the injury could not be explained by the resident; and, the injury is suspicious because of the extent of the injury OR the location of the injury (ex. the injury is located in an area not generally vulnerable to trauma) OR the number of injuries observed at one particular point in time or the incidence of injuries over time.

Adverse Event - An Adverse Event is an untoward, undesirable, and usually unanticipated event that causes death or serious injury, or the risk thereof.

Resident to Resident Abuse - Residents may also abuse each other, either physically, verbally, sexually, or financially. If we have a resident in a situation with another resident, we need to separate them immediately and ensure the safety of both. After we ensure that both residents are safe we are to report immediately to the nurse or supervisor what happened. The nurse will make a report and notify the family and doctor. Some examples of abuse:

- Stealing from a resident
- Hitting a resident
- Pushing a resident
- Yelling or intimidating a resident
- Hurting or injuring another resident
- Mandated Reports

Reporting

As healthcare workers, contractors or volunteers we are ALL Mandated Reporters. This means that if we suspect abuse or neglect, or witness abuse or neglect, we must report it immediately to a supervisor, manager, administrator or anonymously through our Corporate Compliance hotline (see below). Make sure the resident is safe, stop whatever is happening, and then report your observations and actions to the appropriate person.

Remember - Our responsibility to individuals served at Presbyterian Homes & Services is to provide a safe and secure environment!

The Campus Administrator or designee will make an initial external report of the incident or the suspected incident, immediately in accordance with the law.

1. An initial report must be completed and submitted to the State Agency via the state specific contact point.
2. Allegations of abuse, neglect, exploitation or mistreatment, including injuries of unknown source and misappropriation of property will be reported immediately.
3. If the event that caused the allegation involves abuse or results in serious bodily injury the report must be made no later than 2 hours after the allegation is made.

Elder Justice Act

This Act is part of the Federal Affordable Care Act and requires that employees report any "reasonable suspicion" of a crime committed against a resident or person who is receiving care. This crime must be reported to local law enforcement and to the state survey agency. There are penalties for not reporting.

This must be reported within 2 hours if there has been an injury or if there is no injury then it needs to be reported within 24 hours.

To view the PHS Policy & Procedure related to the Elder Justice Act, please see the person in charge of the community.

Quality Assurance and Performance Improvement

Quality Assurance and Performance Improvement (QAPI) is a systematic, data driven, proactive approach for improving the quality of life, care, and services.

All staff are responsible for identifying opportunities for improvement and we are open to insight from others providing services or care to those at Presbyterian Homes & Services. We are committed to providing a fair and just culture in which you feel safe to do so without fear of reprisal. You may report concerns to a supervisor, manager, administrator or anonymously through our Corporate Compliance hotline.

Corporate Compliance & Code of Conduct

Corporate Compliance is a program that includes education and a hotline system to make sure that all of those we serve receive the best care, that our employees have a good workplace, and that all of our laws, rules, and regulations are followed.

The Compliance Plan has 5 standards:

- Quality of Care
- Ethical Business Relationships
- Documentation
- Business Office & Financial Operations
- Eligibility

The following are all in place to make sure we do the right thing every day:

- A compliance officer and committee
- A hotline/helpline to lodge complaints and/or raise issues
- Training for everyone including employees (upon hire & annually), volunteers', contractors, & vendors
- Procedures to promptly investigate reports & concerns
- Employee Handbook
- Audits
- Continuous improvement of systems
- Regular reports to the Corporate Compliance Committee, Board of Directors, and Site Leaders

One component of our program is a Helpline. The Helpline is a voice mailbox monitored by the Corporate Compliance Officer. Any employee, resident, family member, volunteer, vendor, or visitor is welcome to use the Helpline to report any violation of regulations, policies, or Codes of Conduct.

Helpline telephone number is 651-631-6168 or 1-844-761-0287

Codes of Conduct

PHS has 6 Codes of Conduct that ensure the compliance standards are met and that apply to all staff, volunteers, contractors, and vendors that we do business with. If you know or suspect that any of the 6 Codes have been violated, report it immediately to a supervisor, manager, administrator or anonymously through our Corporate Compliance hotline. All reports of suspected violations will be treated confidentially, reviewed, investigated, and appropriate action will be taken as provided by law or policy. Retaliation is prohibited, which means retaliatory action will not be taken against anyone for making a report. Review each of the 6 Codes of Conduct below:

Code of Conduct #1

PHS employees and partners will strive to deliver quality health care services.

Code of Conduct #2

PHS employees and partners will comply with all applicable laws and regulations that affect our various businesses.

Code of Conduct #3

PHS employees and partners shall engage in ethical business relationships.

Code of Conduct #4

PHS employees and partners shall avoid either conflicts of interest or the appearance of any impropriety.

Code of Conduct #5

PHS employees and partners shall protect PHS property and respect the property of residents and others with whom we do business.

Code of Conduct #6

PHS employees and partners respect each other as human beings and health care professionals.

Infection Control

Our responsibility is to provide a safe, sanitary, and comfortable environment and to help prevent the development and transmission of communicable diseases and infections. Infection control is everyone's responsibility.

Chain of Infection

We all need to be aware of how infections are spread and what we can do to stop them. Infections are spread through the "Chain of Infection." You can stop the spread of infections by breaking this chain.

- Handwashing is the most important thing you can do to stop the spread of infections.
- Standard precautions are used anytime we may come in contact with bodily fluids. These: precautions include: hand washing, gloves, gowns, eye protection, and masks.
- Transmission based precautions are additional precautions applied for residents/clients known or suspected to be infected or colonized with infectious agents, including certain pathogens.

Here are some of the ways that germs (pathogens) can enter our bodies:

- Ingestion: swallowing contaminated foods, beverages, or placing contaminated hands or objects in the mouth
- Inhalation: breathing in pathogens

- Broken Skin: through cuts, scrapes, rashes, or chafed areas
- Skin Punctures: needle sticks by items contaminated with blood
- Absorption: through tissues inside the mouth, nose, or eyes

Tuberculosis (TB)

Tuberculosis, or TB, is generally a disease of the lungs and can cause serious illness if not treated. It is caused by bacteria called Mycobacterium tuberculosis which usually attacks the lungs but can also damage other parts of the body. TB spreads through the air when a person with TB of the lungs or throat coughs, sneezes, or talks.

Symptoms of TB in the lungs may include:

- A bad cough that lasts 3 weeks or longer
- Weight loss
- Loss of appetite
- Coughing up blood or mucus
- Fever
- Night sweats

Prevention in the Environment

Cleaning the environment is also an important part of infection prevention. Tables, counters, equipment, tubs, and showers must all be sanitized with the proper disinfectant solution. You can make a clean area for your equipment/home care bag by placing a paper towel down and then putting your equipment on top of it. Of course, housekeeping and culinary staff are also very involved in keeping the environment clean. Remember to keep cleaning supplies in a locked/secure location. If a disinfectant is not available, a bleach solution of 1-part bleach to 10 parts water can also be used.

Cultural Competence

Cultural and linguistic competence is to be able to provide services or care to individuals with diverse values, beliefs and behaviors, and to tailor services to meet the recipients social, cultural, and linguistic needs. Another way we talk about this is through Person-Centered Care.

Person-Centered Care

Person-Centered Care means putting the people we serve at the center of all that we do. We do this by getting to know each person as an individual, giving them choices, and helping them live as independently as they are able.

Dementia Care

PHS Principles of Dementia Care

- Believe persons with dementia are whole individuals with social, emotional, physical and spiritual needs
- Strive to honor the residents' lives by celebrating strengths and accomplishments

- Uphold residents' dignity, self-esteem, and independence through their freedom of choice
- Value and encourage the compassion, flexibility, warmth and creativity of our team
- Learn from one another's experience, interest and expertise in order to attain a higher standard of excellence
- Consider and implement the ongoing contributions of experts and leaders in the field of dementia care.

What is Dementia? Dementia is a condition affecting mental processes, often marked by memory loss. Dementia is the overall term for many different types of memory loss including, Alzheimer's Disease, Dementia with Lewy Body, Vascular Dementia, Parkinson's, Frontotemporal Dementia, and so on.

Common symptoms can include:

- Memory problems, particularly remembering recent events
- Increasing confusion
- Reduced concentration
- Personality or behavior changes
- Apathy and withdrawal or depression
- Loss of ability to do everyday tasks

Below is a list of person-centered, non-pharmacological interventions that could help when working with a person who has Dementia.

- Get into their reality and ask questions, rather than telling them what you know to be true.
- Reassure them that they are okay.
- Bring the person into a calm area, away from other residents.
- Play music that calms the person down.
- Ask the person to help you with a task.
- Ask the person to walk with you.
- Give the person something they love (food, comfort item, photos, tasks, etc.).
- Listen and observe the person's emotion(s) and respond appropriately.

Person-Centered Care and Behavioral Health

Behavioral/Mental Health is one of the biggest barriers to meeting all levels of the universal needs pyramid for those we serve. We don't just care for people's physical health, but we care for their emotional, mental, and spiritual health as well. All of these aspects of well-being affect how people behave. If someone is having a "behavior" they are typically reacting to something. This in turn is a form of communication.

Behavioral Health Definitions

What is Anxiety? Anxiety is a feeling of worry, nervousness, or unease.

What is Depression? Depression is a feeling of sadness, unhappiness, or hopelessness. Depression is not a natural part of aging; however, older adults are at higher risk. The most effective forms of treatment for depression are a combination of therapy and medications.

What is Adjustment Difficulty? Adjustment difficulty is characterized by distress that is out of proportion to the severity or intensity of a stressor. Symptoms usually occur within 3 months of the onset of a stressor and last no longer than 6 months after the stressor or its consequences have ended. It can be related to a single event or involve multiple stressors and may be recurrent or continuous.

What is Substance Use Disorder? Substance Use Disorder, also called Drug Addiction, is a dependence on an addictive substance, specifically alcohol or other drugs. For many people, the most effective approach to treat Substance Use Disorder involves a combination of counseling and medication. Early treatment is best. A

trained professional should do a full evaluation to make the diagnosis. Treatment is individualized and must address each person's needs and symptoms.

What is Trauma? Trauma is the result of an event or series of events or circumstances that are experienced by an individual as physically or emotionally harmful or life threatening and that have lasting negative effects on that person's overall well-being.

What is PTSD? PTSD involves the development of symptoms following exposure to one or more traumatic, life-threatening events.

Regardless of the Behavior or reason behind it, we need to approach each situation with person-centered thinking which includes good communication, conflict management, teamwork, and collaboration. We are all here to provide service and care to maintain our residents in a safe environment that allows them to function at their highest possible level.

Remember-If you see something, say something and if you need something, just ask!

Instruction:

Please complete the short knowledge check to follow on the next page and return it and your attestation statement to a supervisor, manager, or administrator.

Annual Compliance Training for Contractors

Name: _____

Knowledge Check:

1. All of those we serve have rights that are to be respected and protected.
True
False
2. Abuse is the willful infliction of injury, unreasonable confinement, intimidation, or punishment with resulting physical harm, pain, or mental anguish.
True
False
3. If I suspect or witness abuse of any resident, I should assume someone else will report it?
True
False
4. QAPI is an acronym for Quality Assurance and Performance Improvement.
True
False
5. Presbyterian Homes & Services has 5 Standards of their Compliance Plan, two of those standards are Quality of Care and Ethical Business Relationships.
True
False
6. Infections spread through the Chain of Infection and there is nothing we can do to stop it.
True
False
7. In order to provide Person-Centered Care we must understand an individual's culture which could include following;
Language
Race
Religion
All of the Above
8. Person Centered Care is resident driven, meaning the resident is in control.
True
False

9. It is not necessary to engage in meaningful conversation about care with a resident who has Dementia.

True

False

10. Understanding and responding to an individual's behavioral health concerns is an important way we can provide Person-Centered Care.

True

False

11. Moving into a senior living community and/or loss of one's independence can be a traumatic experience.

True

False



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Instructions: Please complete this form and return it to the Campus Administrator’s Office along with the completed Knowledge Check.

Individuals Information			
Individuals Name	Care/Service Providing		
Business/Organization Name Representing			
Street Address	City	State	Zip
Phone	Website		

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I attest that I received the training and information on the topics above and understand my role and responsibilities. I also understand it is my responsibility to ask questions or seek further information if needed.

Print Name

Signature

Email Address

Date