



MICHELLE LUJAN GRISHAM  
Governor

DR. TRACIE C. COLLINS, M.D.  
Cabinet Secretary

Date: March 23, 2021

To: Griselda Valenzuela, Executive Director

Provider: Advantage Communications System, Inc.  
Address: 4219 Montgomery Blvd. NE  
State/Zip: Albuquerque, New Mexico 87109

E-mail Address: [gvalenz32@gmail.com](mailto:gvalenz32@gmail.com)

CC: Laura Veal, Founder / Owner  
[lsveal@yahoo.com](mailto:lsveal@yahoo.com)

Joseph Garcia, Supported Living Director  
[Josephgarcia.adv@gmail.com](mailto:Josephgarcia.adv@gmail.com)

Region: Metro  
Routine Survey: July 20 – August 4, 2020  
Verification Survey: February 15 – March 1, 2021

Program Surveyed: Developmental Disabilities Waiver

Service Surveyed: **2018:** Supported Living, Customized Community Supports, and Community Integrated Employment Services

Survey Type: Verification

Team Leader: Caitlin Wall, BA, BSW, Healthcare Surveyor, Division of Health Improvement/Quality Management Bureau

Team Members: Heather Driscoll, AA, Healthcare Surveyor, Division of Health Improvement/Quality Management Bureau; Joshua Burghart, BS, Healthcare Surveyor, Division of Health Improvement/Quality Management Bureau

Dear Ms. Valenzuela;

The Division of Health Improvement/Quality Management Bureau has completed a Verification survey of the services identified above. The purpose of the survey was to determine compliance with your Plan of Correction submitted to DHI regarding the *Routine Survey on July 20 – August 4, 2020*.

**Determination of Compliance:**

The Division of Health Improvement, Quality Management Bureau has determined your agency is now in:

**Partial Compliance with Standard Level Tags and Conditions of Participation Level Tags:** This determination is based on noncompliance with one to five (1 – 5) Condition of Participation Level Tags (*refer to Attachment D for details*). The attached QMB Report of Findings indicates Standard Level and Condition of Participation Level deficiencies identified and requires completion and implementation of a Plan of Correction.

**DIVISION OF HEALTH IMPROVEMENT**  
5301 Central Avenue NE, Suite 400 • Albuquerque, New Mexico • 87108  
(505) 222-8623 • FAX: (505) 222-8661 • <https://nmhealth.org/about/dhi>



QMB Report of Findings – Advantage Communications System, Inc. – Metro – February 15 – March 1, 2021

Survey Report #: Q.21.3.DDW.28701224.5.VER.01.21.082

The following tags are identified as Condition of Participation Level:

- Tag # 1A32 Administrative Case File: Individual Service Plan Implementation **(New / Repeat Finding)**
- Tag # 1A26.1 Consolidated On-line Registry Employee Abuse Registry **(New / Repeat Finding)**
- Tag # 1A09 Medication Delivery Routine Medication Administration **(New / Repeat Finding)**
- Tag # 1A09.1 Medication Delivery PRN Medication Administration **(New / Repeat Finding)**
- Tag # 1A15.2 Administrative Case File: Healthcare Documentation (Therap and Required Plans) **(Repeat Finding)**

The following tags are identified as Standard Level:

- Tag # 1A26 Consolidated On-line Registry Employee Abuse Registry **(New / Repeat Finding)**

**Plan of Correction:**

The attached Report of Findings identifies the new/repeat Standard Level deficiencies found during your agency's verification compliance review. You are required to complete and implement a Plan of Correction. Your agency has a total of 10 business days from the receipt of this letter. The Plan of Correction must include the following:

1. Evidence your agency has contacted your DDS Regional Office for technical assistance;
2. A Plan of Correction detailing Quality Assurance/Quality Improvement processes to prevent your agency from receiving deficiencies in the future. Please use the format provided at the end of this report;
3. Documentation verifying that newly cited deficiencies have been corrected.

**Submission of your Plan of Correction:**

Please submit your agency's Plan of Correction and documentation verifying correction of survey deficiencies within 10 business days of receipt of this letter to the parties below:

1. **Quality Management Bureau, Attention: Plan of Correction Coordinator**  
**5301 Central Ave. NE Suite 400, New Mexico 87108**  
[MonicaE.Valdez@state.nm.us](mailto:MonicaE.Valdez@state.nm.us)
2. **Developmental Disabilities Supports Division Regional Office for region of service surveyed**

Failure to submit your POC within the allotted 10 business days may result in the imposition of a \$200 per day Civil Monetary Penalty until it is received, completed and/or implemented.

Please call the Plan of Correction Coordinator Monica Valdez at 505-273-1930 if you have questions about the Report of Findings or Plan of Correction. Thank you for your cooperation and for the work you perform.

Sincerely,

*Caitlin Wall, BA, BSW*

Caitlin Wall, BA, BSW  
Team Lead/Healthcare Surveyor  
Division of Health Improvement  
Quality Management Bureau

## Survey Process Employed:

Administrative Review Start Date:	February 15, 2021
Contact / Entrance Meeting:	<b><u>Advantage Communications System, Inc.</u></b> Nicole Anderson, Executive Director Joseph Garcia, Supported Living Director  <b><u>DOH/DHI/QMB</u></b> Caitlin Wall, BA, BSW, Team Lead / Healthcare Surveyor
Exit Conference Date:	February 26, 2021
Present:	<b><u>Advantage Communications System, Inc.</u></b> Griselda Valenzuela, Executive Director Joseph Garcia, Supported Living Director Eli Valdez, QA Manager Barbara Beaudette, Nurse Nicole Espinoza, LPN  <b><u>DOH/DHI/QMB</u></b> Caitlin Wall, BA, BSW, Team Lead/Healthcare Surveyor Amanda Castaneda, MPA, Healthcare Surveyor Supervisor
Administrative Locations Visited:	0 (Note: No administrative locations visited due to COVID- 19 Public Health Emergency.)
Total Sample Size:	11  0 - Jackson Class Members 11 - Non-Jackson Class Members  8 - Supported Living 7 - Customized Community Supports 4 - Community Integrated Employment
Persons Served Records Reviewed	11
Direct Support Personnel Records Reviewed	89
Direct Support Personnel Interviewed during Routine Survey	11
Service Coordinator Records Reviewed	5
Administrative Interview completed during Routine Survey	1
Administrative Processes and Records Reviewed:	<ul style="list-style-type: none"><li>• Medicaid Billing/Reimbursement Records for all Services Provided</li><li>• Accreditation Records</li><li>• Oversight of Individual Funds</li><li>• Individual Medical and Program Case Files, including, but not limited to:<ul style="list-style-type: none"><li>◦ Individual Service Plans</li><li>◦ Progress on Identified Outcomes</li><li>◦ Healthcare Plans</li><li>◦ Medication Administration Records</li></ul></li></ul>

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- Medical Emergency Response Plans
- Therapy Evaluations and Plans
- Healthcare Documentation Regarding Appointments and Required Follow-Up
- Other Required Health Information
- Internal Incident Management Reports and System Process / General Events Reports
- Personnel Files, including nursing and subcontracted staff
- Staff Training Records, Including Competency Interviews with Staff
- Agency Policy and Procedure Manual
- Caregiver Criminal History Screening Records
- Consolidated Online Registry/Employee Abuse Registry
- Human Rights Committee Notes and Meeting Minutes
- Evacuation Drills of Residences and Service Locations
- Quality Assurance / Improvement Plan

CC: Distribution List: DOH - Division of Health Improvement  
DOH - Developmental Disabilities Supports Division  
DOH - Office of Internal Audit  
HSD - Medical Assistance Division  
NM Attorney General's Office

## Attachment B

### Department of Health, Division of Health Improvement QMB Determination of Compliance Process

The Division of Health Improvement, Quality Management Bureau (QMB) surveys compliance of the Developmental Disabilities Waiver (DDW) standards and other state and federal regulations. For the purpose of the LCA / CI survey the CMS waiver assurances have been grouped into four (4) Service Domains: Plan of Care (ISP Implementation); Qualified Providers; Health, Welfare and Safety; and Administrative Oversight (note that Administrative Oversight listed in this document is not the same as the CMS assurance of Administrative Authority. Used in this context it is related to the agency's operational policies and procedures, Quality Assurance system and Medicaid billing and reimbursement processes.)

The QMB Determination of Compliance process is based on provider compliance or non-compliance with standards and regulations identified during the on-site survey process and as reported in the QMB Report of Findings. All areas reviewed by QMB have been agreed to by DDSD and DHI/QMB and are reflective of CMS requirements. All deficiencies (non-compliance with standards and regulations) are identified and cited as either a Standard level deficiency or a Condition of Participation level deficiency in the QMB Reports of Findings. All deficiencies require corrective action when non-compliance is identified.

Each deficiency in your Report of Findings has been predetermined to be a Standard Level Deficiency, a Condition of Participation Level Deficiency, if below 85% compliance or a non-negotiable Condition of Participation Level Deficiency. Your Agency's overall Compliance Determination is based on a Scope and Severity Scale which takes into account the number of Standard and Condition Level Tags cited as well as the percentage of Individuals affected in the sample.

#### Conditions of Participation (CoPs)

CoPs are based on the Centers for Medicare and Medicaid Services, Home and Community-Based Waiver required assurances, in addition to the New Mexico Developmental Disability Waiver (DDW) Service Standards. The Division of Health Improvement (DHI), in conjunction with the Developmental Disability Support Division (DDSD), has identified certain deficiencies that have the potential to be a Condition of Participation Level, if the tag falls below 85% compliance based on the number of people affected. Additionally, there are what are called non-negotiable Conditions of Participation, regardless if one person or multiple people are affected. In this context, a CoP is defined as an essential / fundamental regulation or standard, which when out of compliance directly affects the health and welfare of the Individuals served. If no deficiencies within a Tag are at the level of a CoP, it is cited as a Standard Level Deficiency.

***Service Domains and CoPs for Living Care Arrangements and Community Inclusion are as follows:***

***Service Domain: Service Plan: ISP Implementation - Services are delivered in accordance with the service plan, including type, scope, amount, duration and frequency specified in the service plan.***

**Potential Condition of Participation Level Tags, if compliance is below 85%:**

- **1A08.3** – Administrative Case File: Individual Service Plan / ISP Components
- **1A32** – Administrative Case File: Individual Service Plan Implementation
- **LS14** – Residential Service Delivery Site Case File (ISP and Healthcare Requirements)
- **IS14** – CCS / CIES Service Delivery Site Case File (ISP and Healthcare Requirements)

***Service Domain: Qualified Providers - The State monitors non-licensed/non-certified providers to assure adherence to waiver requirements. The State implements its policies and procedures for verifying that provider training is conducted in accordance with State requirements and the approved waiver.***

**Potential Condition of Participation Level Tags, if compliance is below 85%:**

- **1A20** - Direct Support Personnel Training
- **1A22** - Agency Personnel Competency
- **1A37** – Individual Specific Training

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**Non-Negotiable Condition of Participation Level Tags (one or more Individuals are cited):**

- **1A25.1** – Caregiver Criminal History Screening
- **1A26.1** – Consolidated On-line Registry Employee Abuse Registry

**Service Domain: Health, Welfare and Safety** - *The State, on an ongoing basis, identifies, addresses and seeks to prevent occurrences of abuse, neglect and exploitation. Individuals shall be afforded their basic human rights. The provider supports individuals to access needed healthcare services in a timely manner.*

**Potential Condition of Participation Level Tags, if compliance is below 85%:**

- **1A08.2** – Administrative Case File: Healthcare Requirements & Follow-up
- **1A09** – Medication Delivery Routine Medication Administration
- **1A09.1** – Medication Delivery PRN Medication Administration
- **1A15.2** – Administrative Case File: Healthcare Documentation (Therap and Required Plans)

**Non-Negotiable Condition of Participation Level Tags (one or more Individuals are cited):**

- **1A05** – General Requirements / Agency Policy and Procedure Requirements
- **1A07** – Social Security Income (SSI) Payments
- **1A09.2** – Medication Delivery Nurse Approval for PRN Medication
- **1A15** – Healthcare Coordination - Nurse Availability / Knowledge
- **1A31** – Client Rights/Human Rights
- **LS25.1** – Residential Reqts. (Physical Environment - Supported Living / Family Living / Intensive Medical Living)

## Attachment C

### Guidelines for the Provider Informal Reconsideration of Finding (IRF) Process

#### Introduction:

Throughout the QMB Survey process, surveyors are openly communicating with providers. Open communication means surveyors have clarified issues and/or requested missing information before completing the review through the use of the signed/dated “Document Request,” or “Administrative Needs,” etc. forms. Regardless, there may still be instances where the provider disagrees with a specific finding. Providers may use the following process to informally dispute a finding.

#### Instructions:

1. The Informal Reconsideration of the Finding (IRF) request must be received in writing to the QMB Bureau Chief **within 10 business days** of receipt of the final Report of Findings (**Note: No extensions are granted for the IRF**).
2. The written request for an IRF *must* be completed on the QMB Request for Informal Reconsideration of Finding form available on the QMB website: <https://nmhealth.org/about/dhi/cbp/irf/>
3. The written request for an IRF must specify in detail the request for reconsideration and why the finding is inaccurate.
4. The IRF request must include all supporting documentation or evidence.
5. If you have questions about the IRF process, email the IRF Chairperson, Valerie V. Valdez at [valerie.valdez@state.nm.us](mailto:valerie.valdez@state.nm.us) for assistance.

#### The following limitations apply to the IRF process:

- The written request for an IRF and all supporting evidence must be received within 10 business days.
- Findings based on evidence requested during the survey and not provided may not be subject to reconsideration.
- The supporting documentation must be new evidence not previously reviewed or requested by the survey team.
- Providers must continue to complete their Plan of Correction during the IRF process
- Providers may not request an IRF to challenge the sampling methodology.
- Providers may not request an IRF based on disagreement with the nature of the standard or regulation.
- Providers may not request an IRF to challenge the team composition.
- Providers may not request an IRF to challenge the DHI/QMB determination of compliance or the length of their DDSD provider contract.

A Provider forfeits the right to an IRF if the request is not received within 10 business days of receiving the report and/or does not include all supporting documentation or evidence to show compliance with the standards and regulations.

The IRF Committee will review the request; the Provider will be notified in writing of the ruling; no face-to-face meeting will be conducted.

When a Provider requests that a finding be reconsidered, it does not stop or delay the Plan of Correction process. **Providers must continue to complete the Plan of Correction, including the finding in dispute regardless of the IRF status.** If a finding is removed or modified, it will be noted and removed or modified from the Report of Findings. It should be noted that in some cases a Plan of Correction may be completed prior to the IRF process being completed. The provider will be notified in writing on the decisions of the IRF committee.

## QMB Determinations of Compliance

### **Compliance:**

The QMB determination of *Compliance* indicates that a provider has either no deficiencies found during a survey or that no deficiencies at the Condition of Participation Level were found. The agency has obtained a level of compliance such that there is a minimal potential for harm to individuals' health and safety. To qualify for a determination of *Compliance*, the provider must have received no Conditions of Participation Level Deficiencies and have a minimal number of Individuals on the sample affected by the findings indicated in the Standards Level Tags.

### **Partial-Compliance with Standard Level Tags:**

The QMB determination of *Partial-Compliance with Standard Level Tags* indicates that a provider is in compliance with all Condition of Participation Level deficiencies but is out of compliance with a certain percentage of Standard Level deficiencies. This partial-compliance, if not corrected, may result in a negative outcome or the potential for more than minimal harm to individuals' health and safety. There are two ways to receive a determination of Partial Compliance with Standard Level Tags:

1. Your Report of Findings includes 16 or fewer Standards Level Tags with between 75% and 100% of the survey sample affected in any tag.
2. Your Report of Findings includes 17 or more Standard Level Tags with between 50% to 74% of the survey sample affected in any tag.

### **Partial-Compliance with Standard Level Tags and Condition of Participation Level Tags:**

The QMB determination of *Partial-Compliance with Standard Level Tags and Condition of Participation Level Tags* indicates that a provider is out of compliance with one to five (1 – 5) Condition of Participation Level Tags. This partial-compliance, if not corrected, may result in a serious negative outcome or the potential for more than minimal harm to individuals' health and safety.

### **Non-Compliance:**

The QMB determination of *Non-Compliance* indicates a provider is significantly out of compliance with both Standard Level deficiencies and Conditions of Participation level deficiencies. This non-compliance, if not corrected, may result in a serious negative outcome or the potential for more than minimal harm to individuals' health and safety. There are three ways an agency can receive a determination of Non-Compliance:

1. Your Report of Findings includes 17 or more total Tags with 0 to 5 Condition of Participation Level Tags with 75% to 100% of the survey sample affected in any Condition of Participation Level tag.
2. Your Report of Findings includes any amount of Standard Level Tags with 6 or more Condition of Participation Level Tags.



Compliance Determination	Weighting						
	LOW		MEDIUM			HIGH	
Total Tags:	up to 16	17 or more	up to 16	17 or more	Any Amount	17 or more	Any Amount
	and	and	and	and	And/or	and	And/or
COP Level Tags:	0 COP	0 COP	0 COP	0 COP	1 to 5 COP	0 to 5 CoPs	6 or more COP
	and	and	and	and		and	
Sample Affected:	0 to 74%	0 to 49%	75 to 100%	50 to 74%		75 to 100%	
<b>“Non-Compliance”</b>						17 or more Total Tags with 75 to 100% of the Individuals in the sample cited in any CoP Level tag.	Any Amount of Standard Level Tags and 6 or more Conditions of Participation Level Tags.
<b>“Partial Compliance with Standard Level tags and Condition of Participation Level Tags”</b>					Any Amount Standard Level Tags, plus 1 to 5 Conditions of Participation Level tags.		
<b>“Partial Compliance with Standard Level tags”</b>			up to 16 Standard Level Tags with 75 to 100% of the individuals in the sample cited in any tag.	17 or more Standard Level Tags with 50 to 74% of the individuals in the sample cited any tag.			
<b>“Compliance”</b>	Up to 16 Standard Level Tags with 0 to 74% of the individuals in the sample cited in any tag.	17 or more Standard Level Tags with 0 to 49% of the individuals in the sample cited in any tag.					

**Agency:** Advantage Communications System, Inc. – Metro Region  
**Program:** Developmental Disabilities Waiver  
**Service:** 2018: Supported Living, Customized Community Supports, and Community Integrated Employment Services  
**Survey Type:** Verification  
**Routine Survey:** July 20 – August 4, 2020  
**Verification Survey:** February 15 – March 1, 2021

Standard of Care	Routine Survey Deficiencies July 20 – August 4, 2020	Verification Survey New and Repeat Deficiencies February 15 – March 1, 2021
<b>Service Domain: Service Plans: ISP Implementation</b> – Services are delivered in accordance with the service plan, including type, scope, amount, duration and frequency specified in the service plan.		
<b>Tag # 1A32 Administrative Case File: Individual Service Plan Implementation</b>	<b>Condition of Participation Level Deficiency</b>	<b>Condition of Participation Level Deficiency</b>
<p><b>NMAC 7.26.5.16.C and D Development of the ISP. Implementation of the ISP.</b> The ISP shall be implemented according to the timelines determined by the IDT and as specified in the ISP for each stated desired outcomes and action plan.</p> <p>C. The IDT shall review and discuss information and recommendations with the individual, with the goal of supporting the individual in attaining desired outcomes. The IDT develops an ISP based upon the individual's personal vision statement, strengths, needs, interests and preferences. The ISP is a dynamic document, revised periodically, as needed, and amended to reflect progress towards personal goals and achievements consistent with the individual's future vision. This regulation is consistent with standards established for individual plan development as set forth by the commission on the accreditation of rehabilitation facilities (CARF) and/or other program accreditation approved and adopted by the developmental disabilities division and the department of health. It is the policy of the developmental disabilities division (DDD), that to the extent permitted by funding, each individual receive supports and services that will assist and encourage independence and productivity in the community and attempt to prevent regression or loss of current capabilities. Services and supports include specialized and/or generic services, training, education and/or treatment as determined by the IDT and documented in the ISP.</p>	<p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Based on administrative record review, the Agency did not implement the ISP according to the timelines determined by the IDT and as specified in the ISP for each stated desired outcomes and action plan for 4 of 13 individuals.</p> <p>As indicated by Individuals ISP the following was found with regards to the implementation of ISP Outcomes:</p> <p><b>Supported Living Data Collection/Data Tracking/Progress with regards to ISP Outcomes:</b></p> <p>Individual #5</p> <ul style="list-style-type: none"> <li>• None found regarding: Live Outcome/Action Step: "...will add his routine to his monthly calendar" for 5/2020 - 6/2020. Action step is to be completed 1 time per month.</li> </ul> <p>Individual #8</p> <ul style="list-style-type: none"> <li>• None found regarding: Health/Other Outcome/Action Step: "... will choose from a variety of options every 90 minutes" for 5/2020 - 6/2020. Action step is to be completed daily.</li> </ul>	<p><b>New / Repeat Finding:</b></p> <p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Based on administrative record review, the Agency did not implement the ISP according to the timelines determined by the IDT and as specified in the ISP for each stated desired outcomes and action plan for 4 of 11 individuals.</p> <p>As indicated by Individuals ISP the following was found with regards to the implementation of ISP Outcomes:</p> <p><b>Supported Living Data Collection/Data Tracking/Progress with regards to ISP Outcomes:</b></p> <p>Individual #5</p> <ul style="list-style-type: none"> <li>• None found regarding: Health Outcome/Action Step: "... will be provided various ideas and choose how he wants to exercise, walking, gym, etc." for 12/2020 - 1/2021. Action step is to be completed 1 time per week.</li> <li>• None found regarding: Health Outcome/Action Step: "... will weigh in once a quarter and lose ten</li> </ul>

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D. The intent is to provide choice and obtain opportunities for individuals to live, work and play with full participation in their communities. The following principles provide direction and purpose in planning for individuals with developmental disabilities. [05/03/94; 01/15/97; Recompiled 10/31/01]

Developmental Disabilities (DD) Waiver Service Standards 2/26/2018; Re-Issue: 12/28/2018; Eff 1/1/2019

**Chapter 6: Individual Service Plan (ISP)**

**6.8 ISP Implementation and Monitoring:** All DD Waiver Provider Agencies with a signed SFOC are required to provide services as detailed in the ISP. The ISP must be readily accessible to Provider Agencies on the approved budget. (See Chapter 20: Provider Documentation and Client Records.) CMs facilitate and maintain communication with the person, his/her representative, other IDT members, Provider Agencies, and relevant parties to ensure that the person receives the maximum benefit of his/her services and that revisions to the ISP are made as needed. All DD Waiver Provider Agencies are required to cooperate with monitoring activities conducted by the CM and the DOH. Provider Agencies are required to respond to issues at the individual level and agency level as described in Chapter 16: Qualified Provider Agencies.

**Chapter 20: Provider Documentation and Client Records**

**20.2 Client Records Requirements:** All DD Waiver Provider Agencies are required to create and maintain individual client records. The contents of client records vary depending on the unique needs of the person receiving services and the resultant information produced. The extent of documentation required for individual client records per service type depends on the location of the file, the type of service being provided, and the information necessary. DD Waiver Provider Agencies are required to adhere to the following:

1. Client records must contain all documents essential to the service being provided and essential to ensuring the health and safety of the person during the provision of the service.

- None found regarding: Health/Other Outcome/Action Step: "... will complete his reposition every 90 minutes" for 5/2020 - 6/2020. Action step is to be completed daily.

- Review of Agency's documented Outcomes and Action Steps do not match the current ISP Outcomes and Action Steps for Develop Relationship/Have Fun Outcome.

**Agency's Outcomes/Action Steps are as follows:**

- "...will meet his roommates and decide on activity."

- "...will participate in the activity with his roommates."

**Annual ISP (6/1/2019 - 5/31/2020 and 6/1/2020 - 5/31/2021) Outcomes/Action Steps are as follows:**

- ... will plan his trips."

- "... will go on his trips."

**Individual #10**

- None found regarding: Health/Other Outcome/Action Step: "...will make and follow a weekly mealtime plan" for 6/2020. Action step is to be completed 1 times per week.

- None found regarding: Health/Other Outcome/Action Step: "...will engage in at least 15 minutes of movement" for 6/2020. Action step is to be completed 6 days per week.

**Individual #13**

- Review of Agency's documented Outcomes and Action Steps do not match the current ISP Outcomes and Action Steps for Live Outcome.

**Agency's Outcomes/Action Steps are as follows:**

pounds by the end of his ISP year" for 12/2020 - 1/2021. Action step is to be completed as needed.

**Individual #8**

- None found regarding: Health Outcome/Action Step: "... will choose from a variety of options" for 12/2020 - 1/2021. Action step is to be completed every 90 minutes, daily.

- None found regarding: Health Outcome/Action Step: "... will complete his reposition" for 12/2020 - 1/2021. Action step is to be completed every 90 minutes, daily.

**Individual #10**

- None found regarding: Live Outcome/Action Step: "... will write steps in her log" for 12/2020 - 1/2021. Action step is to be completed 2 times per week.

**Individual #13**

- None found regarding: Live Outcome/Action Step: "... will follow the visual schedule for hygiene routine in the morning 1x a day" for 12/2020. Action step is to be completed 1 time per day.

- None found regarding: Live Outcome/Action Step: "... will follow the visual schedule for hygiene in the evening 1x a day" for 12/2020. Action step is to be completed 1 time per day.

<p>2. Provider Agencies must have readily accessible records in home and community settings in paper or electronic form. Secure access to electronic records through the Therap web-based system using computers or mobile devices is acceptable.</p> <p>3. Provider Agencies are responsible for ensuring that all plans created by nurses, RDs, therapists or BSCs are present in all needed settings.</p> <p>4. Provider Agencies must maintain records of all documents produced by agency personnel or contractors on behalf of each person, including any routine notes or data, annual assessments, semi-annual reports, evidence of training provided/received, progress notes, and any other interactions for which billing is generated.</p> <p>5. Each Provider Agency is responsible for maintaining the daily or other contact notes documenting the nature and frequency of service delivery, as well as data tracking only for the services provided by their agency.</p> <p>6. The current Client File Matrix found in Appendix A Client File Matrix details the minimum requirements for records to be stored in agency office files, the delivery site, or with DSP while providing services in the community.</p> <p>7. All records pertaining to JCMs must be retained permanently and must be made available to DDSD upon request, upon the termination or expiration of a provider agreement, or upon provider withdrawal from services.</p>	<ul style="list-style-type: none"> <li>• <i>“... and staff will identify what routine need to be established.”</i></li> <li>• <i>“Through daily trial and error, ... and staff will refine routines that work for him 1 x daily as services are provided.”</i></li> </ul> <p><b>Annual ISP (10/17/2019 – 10/16/2020) Outcomes/Action Steps are as follows:</b></p> <ul style="list-style-type: none"> <li>• <i>“... will follow the visual schedule for hygiene routine in the morning.”</i></li> </ul> <p><b>Community Integrated Employment Services Data Collection / Data Tracking/Progress with regards to ISP Outcomes:</b></p> <p>Individual #8</p> <ul style="list-style-type: none"> <li>• Review of Agency’s documented Outcomes and Action Steps do not match the current ISP Outcomes and Action Steps for Work/Learn Outcome.</li> </ul> <p><b>Agency’s Outcomes/Action Steps are as follows:</b></p> <ul style="list-style-type: none"> <li>• <i>“... will work scheduled hours and complete assigned tasks”</i></li> </ul> <p><b>Annual ISP (6/1/2019 - 5/31/2020 and 6/1/2020 - 5/31/2021) Outcomes/Action Steps are as follows:</b></p> <ul style="list-style-type: none"> <li>• <i>“... will learn 2 new tasks within the ISP year”</i></li> </ul>	
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Standard of Care	Routine Survey Deficiencies July 20 – August 4, 2020	Verification Survey New and Repeat Deficiencies February 15 – March 1, 2021
<i>Service Domain: Qualified Providers – The State monitors non-licensed/non-certified providers to assure adherence to waiver requirements. The State implements its policies and procedures for verifying that provider training is conducted in accordance with State requirements and the approved waiver.</i>		
<b>Tag # 1A26 Consolidated On-line Registry Employee Abuse Registry</b>	<b>Standard Level Deficiency</b>	<b>Standard Level Deficiency</b>
<p><b>NMAC 7.1.12.8 - REGISTRY ESTABLISHED; PROVIDER INQUIRY REQUIRED:</b> Upon the effective date of this rule, the department has established and maintains an accurate and complete electronic registry that contains the name, date of birth, address, social security number, and other appropriate identifying information of all persons who, while employed by a provider, have been determined by the department, as a result of an investigation of a complaint, to have engaged in a substantiated registry-referred incident of abuse, neglect or exploitation of a person receiving care or services from a provider. Additions and updates to the registry shall be posted no later than two (2) business days following receipt. Only department staff designated by the custodian may access, maintain and update the data in the registry.</p> <p><b>A. Provider requirement to inquire of registry.</b> A provider, prior to employing or contracting with an employee, shall inquire of the registry whether the individual under consideration for employment or contracting is listed on the registry.</p> <p><b>B. Prohibited employment.</b> A provider may not employ or contract with an individual to be an employee if the individual is listed on the registry as having a substantiated registry-referred incident of abuse, neglect or exploitation of a person receiving care or services from a provider.</p> <p><b>C. Applicant's identifying information required.</b> In making the inquiry to the registry prior to employing or contracting with an employee, the provider shall use identifying information concerning the individual under consideration for employment or contracting sufficient to reasonably and completely search the registry, including the name, address, date of birth, social security number, and</p>	<p>Based on record review, the Agency did not maintain documentation in the employee's personnel records that evidenced inquiry into the Employee Abuse Registry prior to employment for 9 of 86 Agency Personnel.</p> <p><b>The following Agency Personnel records contained evidence that indicated the Employee Abuse Registry check was completed after hire:</b></p> <p><b>Direct Support Personnel (DSP):</b></p> <ul style="list-style-type: none"> <li>• #518 – Date of hire 3/11/2020, completed 4/13/2020.</li> <li>• #519 – Date of hire 8/3/2017, completed 8/30/2017.</li> <li>• #535 – Date of hire 2/3/2020, completed 2/6/2020.</li> <li>• #555 – Date of hire 7/17/2018, completed 7/19/2018.</li> <li>• #557 – Date of hire 12/27/2018, completed 12/28/2018.</li> <li>• #564 – Date of hire 10/12/2019, completed 10/16/2019.</li> <li>• #566 – Date of hire 12/20/2018, completed 6/19/2019.</li> <li>• #573 – Date of hire 12/17/2018, completed 2/28/2019.</li> </ul>	<p><b>New / Repeat Finding:</b></p> <p>Based on record review, the Agency did not maintain documentation in the employee's personnel records that evidenced inquiry into the Employee Abuse Registry prior to employment for 4 of 94 Agency Personnel.</p> <p><b>The following Agency Personnel records contained evidence that indicated the Employee Abuse Registry check was completed after hire:</b></p> <p><b>Direct Support Personnel (DSP):</b></p> <ul style="list-style-type: none"> <li>• #596 – Date of hire 8/13/2020, completed 8/26/2020.</li> <li>• #598 – Date of hire 8/20/2020, completed 9/10/2020.</li> <li>• #599 – Date of hire 9/8/2020, completed 9/9/2020.</li> <li>• #600 – Date of hire 9/9/2020, completed 9/28/2020.</li> </ul>

<p>other appropriate identifying information required by the registry.</p> <p><b>D. Documentation of inquiry to registry.</b> The provider shall maintain documentation in the employee's personnel or employment records that evidences the fact that the provider made an inquiry to the registry concerning that employee prior to employment. Such documentation must include evidence, based on the response to such inquiry received from the custodian by the provider, that the employee was not listed on the registry as having a substantiated registry-referred incident of abuse, neglect or exploitation.</p> <p><b>E. Documentation for other staff.</b> With respect to all employed or contracted individuals providing direct care who are licensed health care professionals or certified nurse aides, the provider shall maintain documentation reflecting the individual's current licensure as a health care professional or current certification as a nurse aide.</p> <p><b>F. Consequences of noncompliance.</b> The department or other governmental agency having regulatory enforcement authority over a provider may sanction a provider in accordance with applicable law if the provider fails to make an appropriate and timely inquiry of the registry, or fails to maintain evidence of such inquiry, in connection with the hiring or contracting of an employee; or for employing or contracting any person to work as an employee who is listed on the registry. Such sanctions may include a directed plan of correction, civil monetary penalty not to exceed five thousand dollars (\$5000) per instance, or termination or non-renewal of any contract with the department or other governmental agency.</p>	<ul style="list-style-type: none"> <li>• #574 – Date of hire 12/20/2019, completed 12/30/2019.</li> </ul>	
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Tag # 1A26.1 Consolidated On-line Registry Employee Abuse Registry	Condition of Participation Level Deficiency	Condition of Participation Level Deficiency
<p><b>NMAC 7.1.12.8 - REGISTRY ESTABLISHED; PROVIDER INQUIRY REQUIRED:</b> Upon the effective date of this rule, the department has established and maintains an accurate and complete electronic registry that contains the name, date of birth, address, social security number, and other appropriate identifying information of all persons who, while employed by a provider, have been determined by the department, as a result of an investigation of a complaint, to have engaged in a substantiated registry-referred incident of abuse, neglect or exploitation of a person receiving care or services from a provider. Additions and updates to the registry shall be posted no later than two (2) business days following receipt. Only department staff designated by the custodian may access, maintain and update the data in the registry.</p> <p><b>A. Provider requirement to inquire of registry.</b> A provider, prior to employing or contracting with an employee, shall inquire of the registry whether the individual under consideration for employment or contracting is listed on the registry.</p> <p><b>B. Prohibited employment.</b> A provider may not employ or contract with an individual to be an employee if the individual is listed on the registry as having a substantiated registry-referred incident of abuse, neglect or exploitation of a person receiving care or services from a provider.</p> <p><b>C. Applicant's identifying information required.</b> In making the inquiry to the registry prior to employing or contracting with an employee, the provider shall use identifying information concerning the individual under consideration for employment or contracting sufficient to reasonably and completely search the registry, including the name, address, date of birth, social security number, and other appropriate identifying information required by the registry.</p> <p><b>D. Documentation of inquiry to registry.</b> The provider shall maintain documentation in the employee's personnel or employment records that</p>	<p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Based on record review, the Agency did not maintain documentation in the employee's personnel records that evidenced inquiry into the Employee Abuse Registry prior to employment for 7 of 86 Agency Personnel.</p> <p><b>The following Agency personnel records contained no evidence of the Employee Abuse Registry check being completed:</b></p> <p><b>Direct Support Personnel (DSP):</b></p> <ul style="list-style-type: none"> <li>• #500 – Date of hire 3/5/2020.</li> <li>• #547 – Date of hire 12/30/2019.</li> <li>• #561 – Date of hire 6/8/2016.</li> <li>• #578 – Date of hire 6/29/2020.</li> <li>• #579 – Date of hire 7/31/2018.</li> </ul> <p><b>Service Coordination Personnel (SC):</b></p> <ul style="list-style-type: none"> <li>• #583 – Date of hire 2/1/2017.</li> <li>• #584 – Date of hire 9/15/2019.</li> </ul>	<p><b>New / Repeat Finding:</b></p> <p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Based on record review, the Agency did not maintain documentation in the employee's personnel records that evidenced inquiry into the Employee Abuse Registry prior to employment for 9 of 94 Agency Personnel.</p> <p><b>The following Agency personnel records contained no evidence of the Employee Abuse Registry check being completed:</b></p> <p><b>Direct Support Personnel (DSP):</b></p> <ul style="list-style-type: none"> <li>• #593 – Date of hire 7/21/2020.</li> <li>• #595 – Date of hire 7/23/2020.</li> <li>• #602 – Date of hire 10/30/2020.</li> <li>• #605 – Date of hire 11/18/2020.</li> <li>• #606 – Date of Hire 11/25/2020.</li> <li>• #607 – Date of hire 12/2/2020.</li> <li>• #616 – Date of hire 1/27/2021.</li> <li>• #617 – Date of hire 2/10/2021.</li> <li>• #618 – Date of hire 2/10/2021.</li> </ul>

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evidences the fact that the provider made an inquiry to the registry concerning that employee prior to employment. Such documentation must include evidence, based on the response to such inquiry received from the custodian by the provider, that the employee was not listed on the registry as having a substantiated registry-referred incident of abuse, neglect or exploitation.

**E. Documentation for other staff.** With respect to all employed or contracted individuals providing direct care who are licensed health care professionals or certified nurse aides, the provider shall maintain documentation reflecting the individual's current licensure as a health care professional or current certification as a nurse aide.

**F. Consequences of noncompliance.** The department or other governmental agency having regulatory enforcement authority over a provider may sanction a provider in accordance with applicable law if the provider fails to make an appropriate and timely inquiry of the registry, or fails to maintain evidence of such inquiry, in connection with the hiring or contracting of an employee; or for employing or contracting any person to work as an employee who is listed on the registry. Such sanctions may include a directed plan of correction, civil monetary penalty not to exceed five thousand dollars (\$5000) per instance, or termination or non-renewal of any contract with the department or other governmental agency.



Standard of Care	Routine Survey Deficiencies July 20 – August 4, 2020	Verification Survey New and Repeat Deficiencies February 15 – March 1, 2021
<i>Service Domain: Health and Welfare – The state, on an ongoing basis, identifies, addresses and seeks to prevent occurrences of abuse, neglect and exploitation. Individuals shall be afforded their basic human rights. The provider supports individuals to access needed healthcare services in a timely manner.</i>		
<b>Tag # 1A09 Medication Delivery Routine Medication Administration</b>	<b>Condition of Participation Level Deficiency</b>	<b>Condition of Participation Level Deficiency</b>
<p>Developmental Disabilities (DD) Waiver Service Standards 2/26/2018; Re-Issue: 12/28/2018; Eff 1/1/2019</p> <p><b>Chapter 20: Provider Documentation and Client Records 20.6 Medication Administration Record (MAR):</b> A current Medication Administration Record (MAR) must be maintained in all settings where medications or treatments are delivered. Family Living Providers may opt not to use MARs if they are the sole provider who supports the person with medications or treatments. However, if there are services provided by unrelated DSP, ANS for Medication Oversight must be budgeted, and a MAR must be created and used by the DSP. Primary and Secondary Provider Agencies are responsible for:</p> <ol style="list-style-type: none"> <li>1. Creating and maintaining either an electronic or paper MAR in their service setting. Provider Agencies may use the MAR in Therap, but are not mandated to do so.</li> <li>2. Continually communicating any changes about medications and treatments between Provider Agencies to assure health and safety.</li> <li>7. Including the following on the MAR: <ol style="list-style-type: none"> <li>a. The name of the person, a transcription of the physician's or licensed health care provider's orders including the brand and generic names for all ordered routine and PRN medications or treatments, and the diagnoses for which the medications or treatments are prescribed;</li> <li>b. The prescribed dosage, frequency and method or route of administration; times and dates of administration for all ordered routine or PRN prescriptions or treatments; over the counter (OTC) or "comfort"</li> </ol> </li> </ol>	<p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Medication Administration Records (MAR) were reviewed for the month of June 2020.</p> <p>Based on record review, 6 of 13 individuals had Medication Administration Records (MAR), which contained missing medications entries and/or other errors:</p> <p>Individual #4 June 2020 Medication Administration Records contained missing entries. No documentation found indicating reason for missing entries:</p> <ul style="list-style-type: none"> <li>• SF 1.1% Gel (2 times daily) – Blank 6/28 -30 (8:00 PM)</li> <li>• Vitamin D3 1000 Units 2 Tablets (1 time daily) – Blank 6/29 (8:00 AM)</li> <li>• Sertraline 100 mg 2 Tablets (1 time daily) Blank 6/29 (8:00 AM)</li> </ul> <p>Individual #5 June 2020 Medication Administration Records contained missing entries. No documentation found indicating reason for missing entries:</p> <ul style="list-style-type: none"> <li>• Patanol 0.1% eyedrops 1 drop (2 times daily) – Blank 6/1 – 30 (8:00 AM and 8:00 PM)</li> </ul> <p>Individual #8 June 2020</p>	<p><b>New / Repeat Finding:</b></p> <p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Medication Administration Records (MAR) were reviewed for the month of January 2021.</p> <p>Based on record review, 6 of 8 individuals had Medication Administration Records (MAR), which contained missing medications entries and/or other errors:</p> <p>Individual #4 January 2021 During on-site survey Medication Administration Records were requested for the month of January 2021. As of 3/1/2021, Medication Administration Records for January had not been provided.</p> <p>Individual #5 January 2021 During on-site survey Medication Administration Records were requested for month of January 2021. As of 3/1/2021, Medication Administration Records for January had not been provided.</p> <p>Individual #8 January 2021 Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:</p> <ul style="list-style-type: none"> <li>• Adult Multivitamin Gummies (1 time daily)</li> </ul> <p>Individual #10</p>

<p>medications or treatments and all self-selected herbal or vitamin therapy;</p> <p>c. Documentation of all time limited or discontinued medications or treatments;</p> <p>d. The initials of the individual administering or assisting with the medication delivery and a signature page or electronic record that designates the full name corresponding to the initials;</p> <p>e. Documentation of refused, missed, or held medications or treatments;</p> <p>f. Documentation of any allergic reaction that occurred due to medication or treatments; and</p> <p>g. For PRN medications or treatments:</p> <p>i. instructions for the use of the PRN medication or treatment which must include observable signs/symptoms or circumstances in which the medication or treatment is to be used and the number of doses that may be used in a 24-hour period;</p> <p>ii. clear documentation that the DSP contacted the agency nurse prior to assisting with the medication or treatment, unless the DSP is a Family Living Provider related by affinity of consanguinity; and</p> <p>iii. documentation of the effectiveness of the PRN medication or treatment.</p> <p><b>Chapter 10 Living Care Arrangements</b>  <b>10.3.4 Medication Assessment and Delivery:</b>  Living Supports Provider Agencies must support and comply with:</p> <ol style="list-style-type: none"> <li>1. the processes identified in the DDSD AWMD training;</li> <li>2. the nursing and DSP functions identified in the Chapter 13.3 Part 2- Adult Nursing Services;</li> <li>3. all Board of Pharmacy regulations as noted in Chapter 16.5 Board of Pharmacy; and</li> </ol>	<p>Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:</p> <ul style="list-style-type: none"> <li>• Adult Multivitamin Gummies (1 time daily)</li> </ul> <p>As indicated by the Medication Administration Records the individual is to take Alendronate Sodium 70mg (1 time Weekly). Per MAR medication was given on 6//1, 2, 4, 5, 6, 12, 19, 24 (7AM), Medication was not given as indicated by MAR.</p> <p>Individual #10  June 2020  Physician's Orders indicated the following medication were to be given. The following Medications were not documented on the Medication Administration Records:</p> <ul style="list-style-type: none"> <li>• Ranitidine 150 mg (1 time daily)</li> </ul> <p>Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:</p> <ul style="list-style-type: none"> <li>• Flonase Allergy RLF 50 mcg (1 time daily)</li> <li>• Azelastine 0.1% (137 mcg) (2 times daily)</li> <li>• Diltiazem CD120 mg (1 time daily)</li> </ul> <p>Individual #12  June 2020  Medication Administration Records contained missing entries. No documentation found indicating reason for missing entries:</p> <ul style="list-style-type: none"> <li>• Denta 5000 plus 1.1% cream (2 times daily) – Blank 6/29 - 30 (8:00 PM)</li> </ul> <p>Individual #13  June 2020  Medication Administration Records contained missing entries. No documentation found indicating reason for missing entries:</p>	<p>January 2021  Physician's Orders indicated the following medication were to be given. The following Medications were not documented on the Medication Administration Records:</p> <ul style="list-style-type: none"> <li>• Ranitidine 150 mg (1 time daily)</li> </ul> <p>Individual #12  January 2021  During on-site survey Medication Administration Records were requested for month of January 2021. As of 3/1/2021, Medication Administration Records for January had not been provided.</p> <p>Individual #13  January 2021  During on-site survey Medication Administration Records were requested for month of January 2021. As of 3/1/2021, Medication Administration Records for January had not been provided.</p>
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4. documentation requirements in a Medication Administration Record (MAR) as described in Chapter 20.6 Medication Administration Record (MAR).

**NMAC 16.19.11.8 MINIMUM STANDARDS:**  
A. MINIMUM STANDARDS FOR THE DISTRIBUTION, STORAGE, HANDLING AND RECORD KEEPING OF DRUGS:  
(d) The facility shall have a Medication Administration Record (MAR) documenting medication administered to residents, **including over-the-counter medications**. This documentation shall include:

- (i) Name of resident;
- (ii) Date given;
- (iii) Drug product name;
- (iv) Dosage and form;
- (v) Strength of drug;
- (vi) Route of administration;
- (vii) How often medication is to be taken;
- (viii) Time taken and staff initials;
- (ix) Dates when the medication is discontinued or changed;
- (x) The name and initials of all staff administering medications.

**Model Custodial Procedure Manual**  
**D. Administration of Drugs**

Unless otherwise stated by practitioner, patients will not be allowed to administer their own medications.  
Document the practitioner's order authorizing the self-administration of medications.

All PRN (As needed) medications shall have complete detail instructions regarding the administering of the medication. This shall include:

- symptoms that indicate the use of the medication,
- exact dosage to be used, and
- the exact amount to be used in a 24-hour period.

- Calcium Gummy (1 time daily) – Blank 6/28 – 30 (8:00 AM)
- Gabapentin 300 mg (1 time daily) – Blank 6/28 – 30 (6:00 AM)
- Levetiracetam 250 mg (1 time daily) – Blank 6/28 – 30 (12:00 PM)
- Levetiracetam 250 mg (1 time daily) – Blank 6/28 – 30 (12:00 PM)
- Alprazolam XR 1mg (2 times daily) – Blank 6/28 – 30 (9:00 AM and 6:00 PM)
- Mirtazapine 30 mg (1 time daily) – Blank 6/28 – 30 (9:00 PM)
- NEO/POLY/DEX 0.1% (2 times daily) – Blank 6/28 – 30 (8:00 AM and 8:00 PM)
- Gabapentin 600 mg (2 times daily) – Blank 6/28 – 30 (6:00 AM and 12:00 PM)
- Emergen-C (1 time daily) – Blank 6/28 – 30 (8:00 AM)

As indicated by the Medication Administration Records the individual is to take Levetiracetam 250 mg (1 time daily at 12 pm). According to the Physician's Orders, Levetiracetam 250 mg is to be taken 1 time daily in the morning. Medication Administration Record and Physician's Orders do not match.

Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:

- Multivitamin Gummy (1 time daily)
- Dry Eye Relief (2 times daily)

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|  | <ul style="list-style-type: none"><li>• Fish Oil 57mg (1 time daily)</li><li>• Vitamin E 400 IU (1 time daily)</li><li>• Calcium Gummy (1 time daily)</li><li>• NEO/POLY/DEX 0.1% OPTH OINT (2 times daily)</li><li>• Emergen-C (1 time daily)</li></ul> |  |
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Tag # 1A09.1 Medication Delivery PRN Medication Administration	Condition of Participation Level Deficiency	Condition of Participation Level Deficiency
<p>Developmental Disabilities (DD) Waiver Service Standards 2/26/2018; Re-Issue: 12/28/2018; Eff 1/1/2019</p> <p><b>Chapter 20: Provider Documentation and Client Records 20.6 Medication Administration Record (MAR):</b> A current Medication Administration Record (MAR) must be maintained in all settings where medications or treatments are delivered. Family Living Providers may opt not to use MARs if they are the sole provider who supports the person with medications or treatments. However, if there are services provided by unrelated DSP, ANS for Medication Oversight must be budgeted, and a MAR must be created and used by the DSP. Primary and Secondary Provider Agencies are responsible for:</p> <ol style="list-style-type: none"> <li>1. Creating and maintaining either an electronic or paper MAR in their service setting. Provider Agencies may use the MAR in Therap, but are not mandated to do so.</li> <li>2. Continually communicating any changes about medications and treatments between Provider Agencies to assure health and safety. <ol style="list-style-type: none"> <li>7. Including the following on the MAR: <ol style="list-style-type: none"> <li>a. The name of the person, a transcription of the physician's or licensed health care provider's orders including the brand and generic names for all ordered routine and PRN medications or treatments, and the diagnoses for which the medications or treatments are prescribed;</li> <li>b. The prescribed dosage, frequency and method or route of administration; times and dates of administration for all ordered routine or PRN prescriptions or treatments; over the counter (OTC) or "comfort" medications or treatments and all self-selected herbal or vitamin therapy;</li> <li>c. Documentation of all time limited or discontinued medications or treatments;</li> <li>d. The initials of the individual administering</li> </ol> </li> </ol> </li> </ol>	<p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Medication Administration Records (MAR) were reviewed for the month of June 2020.</p> <p>Based on record review, 6 of 13 individuals had PRN Medication Administration Records (MAR), which contained missing elements as required by standard:</p> <p>Individual #5 June 2020 Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:</p> <ul style="list-style-type: none"> <li>• Midazolam 5mg/ml (PRN)</li> <li>• Cetirizine 10 mg (PRN)</li> </ul> <p>Individual #6 June 2020 Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:</p> <ul style="list-style-type: none"> <li>• Hydrocodone-APAP 5-325 mg (PRN)</li> </ul> <p>As indicated by the Medication Administration Records the individual is to take Senna-Lax 8.6 mg 2 tablets (PRN). According to the Physician's Orders, Senna-Lax 8.6 mg 1 tablet is to be taken 1 time daily or as needed Medication Administration Record and Physician's Orders do not match.</p> <p>As indicated by the Medication Administration Records the individual is to take Docusate Sodium 100 mg (PRN). According to the Physician's Orders, Docusate Sodium 100 mg is</p>	<p><b>New / Repeat Finding:</b></p> <p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Medication Administration Records (MAR) were reviewed for the month of January 2021.</p> <p>Based on record review, 3 of 8 individuals had PRN Medication Administration Records (MAR), which contained missing elements as required by standard:</p> <p>Individual #5 January 2021 During on-site survey Medication Administration Records were requested for month of January 2021. As of 3/1/2021, Medication Administration Records for January had not been provided.</p> <p>Individual #12 January 2021 During on-site survey Medication Administration Records were requested for month of January 2021. As of 3/1/2021, Medication Administration Records for January had not been provided.</p> <p>Individual #13 January 2021 During on-site survey Medication Administration Records were requested for month of January 2021. As of 3/1/2021, Medication Administration Records for January had not been provided.</p>

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<p>or assisting with the medication delivery and a signature page or electronic record that designates the full name corresponding to the initials;</p> <p>e. Documentation of refused, missed, or held medications or treatments;</p> <p>f. Documentation of any allergic reaction that occurred due to medication or treatments; and</p> <p>g. For PRN medications or treatments:</p> <p>i. instructions for the use of the PRN medication or treatment which must include observable signs/symptoms or circumstances in which the medication or treatment is to be used and the number of doses that may be used in a 24-hour period;</p> <p>ii. clear documentation that the DSP contacted the agency nurse prior to assisting with the medication or treatment, unless the DSP is a Family Living Provider related by affinity of consanguinity; and</p> <p>iii. documentation of the effectiveness of the PRN medication or treatment.</p> <p><b>Chapter 10 Living Care Arrangements</b>  <b>10.3.4 Medication Assessment and Delivery:</b>  Living Supports Provider Agencies must support and comply with:</p> <ol style="list-style-type: none"> <li>1. the processes identified in the DDSD AWMD training;</li> <li>2. the nursing and DSP functions identified in the Chapter 13.3 Part 2- Adult Nursing Services;</li> <li>3. all Board of Pharmacy regulations as noted in Chapter 16.5 Board of Pharmacy; and</li> <li>4. documentation requirements in a Medication Administration Record (MAR) as described in Chapter 20.6 Medication Administration Record (MAR).</li> </ol>	<p>to be taken 1 cap oral BID daily or as needed  Medication Administration Record and Physician's Orders do not match.</p> <p>Individual #8  June 2020  Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:</p> <ul style="list-style-type: none"> <li>• Loratadine 10 mg (PRN)</li> </ul> <p>Individual #10  June 2020  Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:</p> <ul style="list-style-type: none"> <li>• Miconazole Powder 2% (PRN)</li> <li>• Desitin Diaper Rash 40% Paste (PRN)</li> <li>• Oxygen (PRN)</li> <li>• Proctosol-HC 2.5% Cream (PRN)</li> <li>• Polyethylene Glycol 3350 Powder (PRN)</li> <li>• Docusate Sodium 100 MG (PRN)</li> <li>• Aquaphor W-NAT HEAL OINT (PRN)</li> </ul> <p>Individual #12  June 2020  Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:</p> <ul style="list-style-type: none"> <li>• Ibuprofen 800 mg (PRN)</li> <li>• Voltaren 1% gel (PRN)</li> </ul> <p>Individual #13  June 2020</p>	
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Medication Administration Records contain the following medications. No Physician's Orders were found for the following medications:

- Loratadine 10 mg (PRN)
- Calcium Antacid 500 mg (PRN)
- Fluticasone Prop 50 mcg SPR (PRN)

Tag # 1A15.2 Administrative Case File: Healthcare Documentation (Therap and Required Plans)	Condition of Participation Level Deficiency	Condition of Participation Level Deficiency
<p>Developmental Disabilities (DD) Waiver Service Standards 2/26/2018; Re-Issue: 12/28/2018; Eff 1/1/2019</p> <p><b>Chapter 20: Provider Documentation and Client Records: 20.2 Client Records Requirements:</b> All DD Waiver Provider Agencies are required to create and maintain individual client records. The contents of client records vary depending on the unique needs of the person receiving services and the resultant information produced. The extent of documentation required for individual client records per service type depends on the location of the file, the type of service being provided, and the information necessary. DD Waiver Provider Agencies are required to adhere to the following:</p> <ol style="list-style-type: none"> <li>1. Client records must contain all documents essential to the service being provided and essential to ensuring the health and safety of the person during the provision of the service.</li> <li>2. Provider Agencies must have readily accessible records in home and community settings in paper or electronic form. Secure access to electronic records through the Therap web-based system using computers or mobile devices is acceptable.</li> <li>3. Provider Agencies are responsible for ensuring that all plans created by nurses, RDs, therapists or BSCs are present in all needed settings.</li> <li>4. Provider Agencies must maintain records of all documents produced by agency personnel or contractors on behalf of each person, including any routine notes or data, annual assessments, semi-annual reports, evidence of training provided/received, progress notes, and any other interactions for which billing is generated.</li> <li>5. Each Provider Agency is responsible for maintaining the daily or other contact notes documenting the nature and frequency of service delivery, as well as data tracking only for the services provided by their agency.</li> <li>6. The current Client File Matrix found in Appendix A Client File Matrix details the minimum requirements for</li> </ol>	<p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Based on record review, the Agency did not maintain the required documentation in the Individuals Agency Record as required by standard for 6 of 13 individual</p> <p>Review of the administrative individual case files revealed the following items were not found, incomplete, and/or not current:</p> <p><b>Electronic Comprehensive Health Assessment Tool (eCHAT):</b></p> <ul style="list-style-type: none"> <li>➤ Not Current (#4) <i>(Note: Completed in Therap during the on-site survey. Provider please complete POC for ongoing QA/QI.)</i></li> </ul> <p><b>eCHAT Summary:</b></p> <ul style="list-style-type: none"> <li>➤ Not Found (#5)</li> <li>➤ Not Current (#4) <i>(Note: Completed in Therap during the on-site survey. Provider please complete POC for ongoing QA/QI.)</i></li> </ul> <p><b>Medication Administration Assessment Tool:</b></p> <ul style="list-style-type: none"> <li>➤ Not Current (#4) <i>(Note: Completed in Therap during the on-site survey. Provider please complete POC for ongoing QA/QI.)</i></li> </ul> <p><b>Aspiration Risk Screening Tool:</b></p> <ul style="list-style-type: none"> <li>➤ Not Current (#4) <i>(Note: Completed in Therap during the on-site survey. Provider please complete POC for ongoing QA/QI.)</i></li> </ul> <p><b>Comprehensive Aspiration Risk Management Plan:</b></p> <ul style="list-style-type: none"> <li>➤ Not Found (#6, 10, 13)</li> </ul>	<p><b>Repeat Finding:</b></p> <p>After an analysis of the evidence it has been determined there is a significant potential for a negative outcome to occur.</p> <p>Based on record review, the Agency did not maintain the required documentation in the Individuals Agency Record as required by standard for 2 of 11 individual</p> <p>Review of the administrative individual case files revealed the following items were not found, incomplete, and/or not current:</p> <p><b>Comprehensive Aspiration Risk Management Plan:</b></p> <ul style="list-style-type: none"> <li>➤ Not Found (#10, 13)</li> </ul>

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records to be stored in agency office files, the delivery site, or with DSP while providing services in the community.

7. All records pertaining to JCMs must be retained permanently and must be made available to DDSD upon request, upon the termination or expiration of a provider agreement, or upon provider withdrawal from services.

**Chapter 3 Safeguards: 3.1.1 Decision Consultation Process (DCP):** Health decisions are the sole domain of waiver participants, their guardians or healthcare decision makers. Participants and their healthcare decision makers can confidently make decisions that are compatible with their personal and cultural values. Provider Agencies are required to support the informed decision making of waiver participants by supporting access to medical consultation, information, and other available resources according to the following:

1. The DCP is used when a person or his/her guardian/healthcare decision maker has concerns, needs more information about health-related issues, or has decided not to follow all or part of an order, recommendation, or suggestion. This includes, but is not limited to:

- a. medical orders or recommendations from the Primary Care Practitioner, Specialists or other licensed medical or healthcare practitioners such as a Nurse Practitioner (NP or CNP), Physician Assistant (PA) or Dentist;
- b. clinical recommendations made by registered/licensed clinicians who are either members of the IDT or clinicians who have performed an evaluation such as a video-fluoroscopy;
- c. health related recommendations or suggestions from oversight activities such as the Individual Quality Review (IQR) or other DOH review or oversight activities; and
- d. recommendations made through a Healthcare Plan (HCP), including a Comprehensive Aspiration Risk Management Plan (CARMP), or another plan.

**Health Care Plans:**

**Reflux:**

- Individual #10 - As indicated by the IST section of ISP the individual is required to have a plan. No evidence of a plan found.  
*(Note: Plan was created and Linked / attached in Therap during the on-site survey. Provider please complete POC for ongoing QA/QI.)*

**Constipation:**

- Individual #13 - As indicated by the IST section of ISP the individual is required to have a plan. No evidence of a plan found.

**Medical Emergency Response Plans:**

**Gastrointestinal:**

- Individual #2 - As indicated by the IST section of ISP the individual is required to have a plan. No evidence of a plan found.

**Endocrine**

- Individual #10 - According to Electronic Comprehensive Health Assessment Tool the individual is required to have a plan. No evidence of a plan found. *(Note: Plan was created and Linked / attached in Therap during the on-site survey. Provider please complete POC for ongoing QA/QI.)*

2. When the person/guardian disagrees with a recommendation or does not agree with the implementation of that recommendation, Provider Agencies follow the DCP and attend the meeting coordinated by the CM. During this meeting:
- a. Providers inform the person/guardian of the rationale for that recommendation, so that the benefit is made clear. This will be done in layman's terms and will include basic sharing of information designed to assist the person/guardian with understanding the risks and benefits of the recommendation.
  - b. The information will be focused on the specific area of concern by the person/guardian. Alternatives should be presented, when available, if the guardian is interested in considering other options for implementation.
  - c. Providers support the person/guardian to make an informed decision.
  - d. The decision made by the person/guardian during the meeting is accepted; plans are modified; and the IDT honors this health decision in every setting.

**Chapter 13 Nursing Services: 13.2.5 Electronic Nursing Assessment and Planning Process:** The nursing assessment process includes several DDSD mandated tools: the electronic Comprehensive Nursing Assessment Tool (e-CHAT), the Aspiration Risk Screening Tool (ARST) and the Medication Administration Assessment Tool (MAAT) . This process includes developing and training Health Care Plans and Medical Emergency Response Plans. The following hierarchy is based on budgeted services and is used to identify which Provider Agency nurse has primary responsibility for completion of the nursing assessment process and related subsequent planning and training. Additional communication and collaboration for planning specific to CCS or CIE services may be needed. The hierarchy for Nursing Assessment and Planning responsibilities is:

1. Living Supports: Supported Living, IMLS or Family Living via ANS;
2. Customized Community Supports- Group; and

3. Adult Nursing Services (ANS):
  - a. for persons in Community Inclusion with health-related needs; or
  - b. if no residential services are budgeted but assessment is desired and health needs may exist.

**13.2.6 The Electronic Comprehensive Health Assessment Tool (e-CHAT)**

1. The e-CHAT is a nursing assessment. It may not be delegated by a licensed nurse to a non-licensed person.
2. The nurse must see the person face-to-face to complete the nursing assessment. Additional information may be gathered from members of the IDT and other sources.
3. An e-CHAT is required for persons in FL, SL, IMLS, or CCS-Group. All other DD Waiver recipients may obtain an e-CHAT if needed or desired by adding ANS hours for assessment and consultation to their budget.
4. When completing the e-CHAT, the nurse is required to review and update the electronic record and consider the diagnoses, medications, treatments, and overall status of the person. Discussion with others may be needed to obtain critical information.
5. The nurse is required to complete all the e-CHAT assessment questions and add additional pertinent information in all comment sections.

**13.2.7 Aspiration Risk Management Screening Tool (ARST)**

**13.2.8 Medication Administration Assessment Tool (MAAT):**

1. A licensed nurse completes the DDSD Medication Administration Assessment Tool (MAAT) at least two weeks before the annual ISP meeting.
2. After completion of the MAAT, the nurse will present recommendations regarding the level of assistance with medication delivery (AWMD) to the IDT. A copy of the MAAT will be sent to all the team members two weeks before the annual ISP meeting and the original MAAT will be retained in the Provider Agency records.

3. Decisions about medication delivery are made by the IDT to promote a person's maximum independence and community integration. The IDT will reach consensus regarding which criteria the person meets, as indicated by the results of the MAAT and the nursing recommendations, and the decision is documented this in the ISP.

**13.2.9 Healthcare Plans (HCP):**

1. At the nurse's discretion, based on prudent nursing practice, interim HCPs may be developed to address issues that must be implemented immediately after admission, readmission or change of medical condition to provide safe services prior to completion of the e-CHAT and formal care planning process. This includes interim ARM plans for those persons newly identified at moderate or high risk for aspiration. All interim plans must be removed if the plan is no longer needed or when final HCP including CARMPs are in place to avoid duplication of plans.

2. In collaboration with the IDT, the agency nurse is required to create HCPs that address all the areas identified as required in the most current e-CHAT summary report which is indicated by "R" in the HCP column. At the nurse's sole discretion, based on prudent nursing practice, HCPs may be combined where clinically appropriate. The nurse should use nursing judgment to determine whether to also include HCPs for any of the areas indicated by "C" on the e-CHAT summary report. The nurse may also create other HCPs plans that the nurse determines are warranted.

**13.2.10 Medical Emergency Response Plan (MERP):**

1. The agency nurse is required to develop a Medical Emergency Response Plan (MERP) for all conditions marked with an "R" in the e-CHAT summary report. The agency nurse should use her/his clinical judgment and input from the Interdisciplinary Team (IDT) to determine whether shown as "C" in the e-CHAT summary report or other conditions also warrant a MERP.

2. MERPs are required for persons who have one or

more conditions or illnesses that present a likely potential to become a life-threatening situation.

**Chapter 20: Provider Documentation and Client Records: 20.5.3 Health Passport and Physician Consultation Form:**

All Primary and Secondary Provider Agencies must use the Health Passport and Physician Consultation form from the Therap system. This standardized document contains individual, physician and emergency contact information, a complete list of current medical diagnoses, health and safety risk factors, allergies, and information regarding insurance, guardianship, and advance directives. The Health Passport also includes a standardized form to use at medical appointments called the Physician Consultation form.

Standard of Care	Routine Survey Deficiencies July 20 – August 4, 2020	Verification Survey New and Repeat Deficiencies February 15 – March 1, 2021
<i>Service Domain: Service Plans: ISP Implementation – Services are delivered in accordance with the service plan, including type, scope, amount, duration and frequency specified in the service plan.</i>		
Tag # 1A08 Administrative Case File (Other Required Documents)	Standard Level Deficiency	COMPLETE
Tag # 1A08.3 Administrative Case File: Individual Service Plan / ISP Components	Standard Level Deficiency	COMPLETE
Tag # 1A32.1 Administrative Case File: Individual Service Plan Implementation (Not Completed at Frequency)	Standard Level Deficiency	COMPLETE
<i>Service Domain: Qualified Providers – The State monitors non-licensed/non-certified providers to assure adherence to waiver requirements. The State implements its policies and procedures for verifying that provider training is conducted in accordance with State requirements and the approved waiver.</i>		
Tag # 1A22 Agency Personnel Competency	Condition of Participation Level Deficiency	COMPLETE
Tag # 1A25 Caregiver Criminal History Screening	Standard Level Deficiency	COMPLETE
Tag # 1A25.1 Caregiver Criminal History Screening	Condition of Participation Level Deficiency	COMPLETE
Tag # 1A37 Individual Specific Training	Condition of Participation Level Deficiency	COMPLETE
Tag # 1A43.1 General Events Reporting: Individual Reporting	Standard Level Deficiency	COMPLETE
<i>Service Domain: Health and Welfare – The state, on an ongoing basis, identifies, addresses and seeks to prevent occurrences of abuse, neglect and exploitation. Individuals shall be afforded their basic human rights. The provider supports individuals to access needed healthcare services in a timely manner.</i>		
Tag # 1A03 Continuous Quality Improvement System & Key Performance Indicators (KPIs)	Standard Level Deficiency	COMPLETE
Tag # 1A05 General Requirements / Agency Policy and Procedure Requirements	Condition of Participation Level Deficiency	COMPLETE
Tag # 1A09.0 Medication Delivery Routine Medication Administration	Standard Level Deficiency	COMPLETE
Tag # 1A09.1.0 Medication Delivery PRN Medication Administration	Standard Level Deficiency	COMPLETE
Tag # 1A15 Healthcare Coordination - Nurse Availability / Knowledge	Condition of Participation Level Deficiency	COMPLETE
<i>Service Domain: Medicaid Billing/Reimbursement – State financial oversight exists to assure that claims are coded and paid for in accordance with the reimbursement methodology specified in the approved waiver.</i>		
Tag # IS30 Customized Community Supports Reimbursement	Standard Level Deficiency	COMPLETE
Tag # LS26 Supported Living Reimbursement	Standard Level Deficiency	COMPLETE

	Verification Survey Plan of Correction, On-going QA/QI and Responsible Party	Completion Date
<p><b>Tag # 1A32 Administrative Case</b>  <b>File: Individual Service Plan</b>  <b>Implementation</b></p>	<p><b>Provider:</b>  State your Plan of Correction for the deficiencies cited in <b>this tag here</b> <i>(How is the deficiency going to be corrected? This can be specific to each deficiency cited or if possible an overall correction?):</i> →</p> <p><b>Provider:</b>  Enter your <b>ongoing</b> Quality Assurance/Quality Improvement processes as it related to <b>this tag number here</b> <i>(What is going to be done? How many individuals is this going to affect? How often will this be completed? Who is responsible? What steps will be taken if issues are found?):</i> →</p>	
<p><b>Tag # 1A26 Consolidated On-line</b>  <b>Registry Employee Abuse Registry</b></p>	<p><b>Provider:</b>  State your Plan of Correction for the deficiencies cited in <b>this tag here</b> <i>(How is the deficiency going to be corrected? This can be specific to each deficiency cited or if possible an overall correction?):</i> →</p> <p><b>Provider:</b>  Enter your <b>ongoing</b> Quality Assurance/Quality Improvement processes as it related to <b>this tag number here</b> <i>(What is going to be done? How many individuals is this going to affect? How often will this be completed? Who is responsible? What steps will be taken if issues are found?):</i> →</p>	

<p><b>Tag # 1A26.1 Consolidated On-line Registry Employee Abuse Registry</b></p>	<p><b>Provider:</b>  <b>State your Plan of Correction for the deficiencies cited in this tag here</b> <i>(How is the deficiency going to be corrected? This can be specific to each deficiency cited or if possible an overall correction?):</i> →</p> <p><b>Provider:</b>  <b>Enter your ongoing Quality Assurance/Quality Improvement processes as it related to this tag number here</b> <i>(What is going to be done? How many individuals is this going to affect? How often will this be completed? Who is responsible? What steps will be taken if issues are found?):</i> →</p>	
<p><b>Tag # 1A09 Medication Delivery Routine Medication Administration</b></p>	<p><b>Provider:</b>  <b>State your Plan of Correction for the deficiencies cited in this tag here</b> <i>(How is the deficiency going to be corrected? This can be specific to each deficiency cited or if possible an overall correction?):</i> →</p> <p><b>Provider:</b>  <b>Enter your ongoing Quality Assurance/Quality Improvement processes as it related to this tag number here</b> <i>(What is going to be done? How many individuals is this going to affect? How often will this be completed? Who is responsible? What steps will be taken if issues are found?):</i> →</p>	



<p><b>Tag # 1A09.1 Medication Delivery PRN Medication Administration</b></p>	<p><b>Provider:</b>  State your <b>Plan of Correction</b> for the deficiencies cited in <b>this tag here</b> <i>(How is the deficiency going to be corrected? This can be specific to each deficiency cited or if possible an overall correction?):</i> →</p> <p><b>Provider:</b>  Enter your <b>ongoing Quality Assurance/Quality Improvement processes</b> as it related to <b>this tag number here</b> <i>(What is going to be done? How many individuals is this going to affect? How often will this be completed? Who is responsible? What steps will be taken if issues are found?):</i> →</p>	
<p><b>Tag # 1A15.2 Administrative Case File: Healthcare Documentation (Therap and Required Plans)</b></p>	<p><b>Provider:</b>  State your <b>Plan of Correction</b> for the deficiencies cited in <b>this tag here</b> <i>(How is the deficiency going to be corrected? This can be specific to each deficiency cited or if possible an overall correction?):</i> →</p> <p><b>Provider:</b>  Enter your <b>ongoing Quality Assurance/Quality Improvement processes</b> as it related to <b>this tag number here</b> <i>(What is going to be done? How many individuals is this going to affect? How often will this be completed? Who is responsible? What steps will be taken if issues are found?):</i> →</p>	



MICHELLE LUJAN GRISHAM  
Governor

DR. TRACIE C. COLLINS, M.D.  
Cabinet Secretary

Date: May 21, 2021

To: Griselda Valenzuela, Executive Director

Provider: Advantage Communications System, Inc.  
Address: 4219 Montgomery Blvd. NE  
State/Zip: Albuquerque, New Mexico 87109

E-mail Address: [gvalenz32@gmail.com](mailto:gvalenz32@gmail.com)

CC: Laura Veal, Founder / Owner  
[lsveal@yahoo.com](mailto:lsveal@yahoo.com)

Joseph Garcia, Supported Living Director  
[Josephgarcia.adv@gmail.com](mailto:Josephgarcia.adv@gmail.com)

Region: Metro  
Routine Survey: July 20 – August 4, 2020  
Verification Survey: February 15 – March 1, 2021

Dear Ms. Valenzuela:

The Division of Health Improvement/Quality Management Bureau has received, reviewed and approved the supporting documents you submitted for your Plan of Correction. The documents you provided verified that all previously cited survey Deficiencies have been corrected.

**The Plan of Correction process is now complete.**

**Furthermore, your agency is now determined to be in Compliance with all Conditions of Participation.**

To maintain ongoing compliance with standards and regulations, continue to use the Quality Assurance (self-auditing) processes you described in your Plan of Correction.

Consistent use of these Quality Assurance processes will enable you to identify and promptly respond to problems, enhance your service delivery, and result in fewer deficiencies cited in future QMB surveys.

Thank you for your cooperation with the Plan of Correction process, for striving to come into compliance with standards and regulations, and for helping to provide the health, safety and personal growth of the people you serve.

Sincerely,

*Monica Valdez, BS*

Monica Valdez, BS  
Healthcare Surveyor Advanced/Plan of Correction Coordinator  
Quality Management Bureau/DHI

Q.21.3.DDW.28701224.5.VER.09.21.141

