



Facility Audit for Abuse Prohibition And Sources for Required Contacts

The purpose of this audit/Source List is to determine if there are facility policies, procedures and education guidelines in place to accomplish the following:

- 1) prohibit resident abuse and/or neglect, and misappropriation of resident property;
- 2) educate staff, residents and families on facility policies and procedures;
- 3) determine if there are residents who may be at risk or have been abused or neglected; and
- 4) to provide the nursing home with a list of required contacts and other useful resources.

Audit Objectives:

1. To determine if facility policies and procedures contain correct content as directed by the SOM, Appendix PP, Section F-226 (See "Resources").
2. To determine if educational programs are adequate.
3. To evaluate if there are any signs of resident abuse or neglect.

Residents Sample: All female and male residents, and staff of the facility.

Date of evaluation: _____

Time of evaluation: _____

Audit Criteria:

The facility policy reflects that, prior to hiring, new hires (both licensed and unlicensed) or volunteers are screened to determine if they are listed on the employee disqualification list or prohibited from working by their professional licensing board and a criminal background check is initiated. (See Resources for contact information) Yes No

The facility policy for screening identifies who will screen prospective employees, how they will be screened and within what time frame. (See "Resources" for web links for Federal and MO state guidelines for abuse policies) Yes No

Before hiring the past employer is called. Yes No

Within two days of hire a criminal background check is completed. (See "Resources"). Yes No

Facility policy reflects actions to be taken if criminal background check is positive. Yes No

Actions to be taken include checking for possible waivers (See "Resources" for web links) and, if no waiver present, termination of employment. Yes No

Records reflect that, before hiring, licensing boards and registries are always checked. Yes No

Facility policy indicates that the Missouri Employ Disqualification List will be checked on a quarterly basis and identifies who will be responsible for checking the list (See Resources for web site). The facility educates staff about how to prohibit abuse during orientation to the facility and on a routine basis thereafter. Yes No

Staff is trained about how to deal with resident catastrophic reactions. Yes No

Staff is trained about how to deal with verbally aggressive residents. Yes No

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Staff are trained about to deal with physically aggressive residents.	Yes	No
Staff is trained on how to report concerns to supervisory staff.	Yes	No
Supervisory staff is trained to review all concerns related to alleged abuse or neglect.	Yes	No
Supervisory staff has a mechanism defined to provide feedback regarding abuse or neglect concerns.	Yes	No
Staff is trained to identify signs of irritation, frustration or stress, within themselves, that may lead to the abuse of residents.	Yes	No
Facility policy defines what constitutes abuse. (One possible definition is "mistreatment of older individuals, either intentionally or unintentional, that causes harm or potential harm)."	Yes	No
Facility policy defines what constitutes neglect (failure to provide needed care and support).	Yes	No
Facility policy defines what constitutes misappropriation of resident property and includes personal property, money or other items the resident values.	Yes	No
The facility is evaluated on routine basis looking for situations that may allow for abuse, neglect or misappropriation of property to occur.	Yes	No
The facility has staffing policies that allow for the presence of appropriate numbers of non-licensed and licensed staff to meet the residents needs (including things such as feeding, toileting, periods of rest, periods of activity).	Yes	No
The facility has policies that identify inappropriate staff behavior toward residents (rough language or handling of the resident, ignoring residents' cries or requests for assistance, directing residents to urinate or defecate in their clothing or beds).	Yes	No
Residents who demonstrate behavior that may be frustrating or challenging to staff have a plan of care developed to manage these behaviors.	Yes	No
Facility has policies in place that instruct staff to report signs that may indicate abuse.	Yes	No
Facility has policies in place for the investigation of injuries of unknown origin (including bruises).	Yes	No
The policy for abuse identification includes such events such as; excessive number of injuries such as skin tears, excessive bruising in various stages of healing, fractures not attributable to an event or an excessive number of fractures occurring during a particular shift or under the care of one individual, residents being hit, slapped or pushed, residents expressing fear of staff.	Yes	No

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The policy for neglect identification includes events such as; lack of appropriate attire or grooming, residents' calling out and staff not assisting residents with lack of hygiene, residents not being toileted or changed, not giving care that may threaten life or seriously compromises health and welfare.	Yes	No
Facility policy identifies who should report alleged instances of abuse to the Elder Abuse Hotline. (See "Resources")	Yes	No
Facility self-reports injury of unknown origin to the Elder Abuse and Neglect Hotline if the injury is unobserved, the resident is unable to explain the injury and circumstances of the injury are deemed suspicious. (See "Resources" for Hotline number)	Yes	No
Facility policy identifies procedures to protect residents during an investigation of abuse, neglect or misappropriation of property.	Yes	No
Facility policy identifies staff responsible for reporting substantiated episodes of abuse, neglect or misappropriation to nurse aide registries or licensing agencies.	Yes	No

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Resources and Contact Agencies

A. Federal Regulatory Resources:

1. Federal Guidelines for Abuse Policies – State Operations Manual (SOM), Appendix PP: “Interpretive Guidelines for Long-Term Care”, Sections F223 –Abuse; F224 and F226 - Staff Treatment of Residents. Available: <http://www.cms.hhs.gov/Manuals/IOM/list.asp> (Scroll to Publication # 100-07).

B. State Resources (Note - Resources given are for the state of Missouri. Other states will need to incorporate their own state-specific listings):

2. Missouri Revised Statutes (RSMo):
 - a. Chapter 198 - Convalescent, Nursing and Boarding Homes. Available: <http://www.moga.mo.gov/statutes/c198.htm> (Section 198.070).
 - b. Chapter 565 - Offenses Against the Person. Available: <http://www.moga.mo.gov/statutes/c565.htm> (Section 565.180) through 565.220)
3. Employee Disqualification:
 - a. Missouri Family Care Safety Registry - Available: <http://www.dhss.mo.gov/FCSR/index.html>); phone: 573-522-6510 or 866-422-6872.
 - b. Employ Disqualification List: <http://www.dhss.mo.gov/EDL/>
 - c. Missouri Division of Professional Registration - Available: <http://pr.mo.gov/>
 - d. Waiver information –
 - i. Unlicensed - Available: <http://www.dhss.mo.gov/GoodCauseWaiver/>
 - ii. Licensed – Check with MO Division of Professional Registration on an individual basis.
4. Criminal Background Checks:
 - a. The Missouri Highway Patrol (Check your phone book for local listings); but, for faster service, the MHP recommends the services of L-1 Identity Solutions. See: <http://www.l1id.com> or call: 866-522-7067.
 - b. If you are a member of a state LTC agency (such as the MO HealthCare Association or Association of Nursing Home Administrators, etc.), they will provide background check services within the state. A fee applies.
5. Missouri Department of Health and Senior Services:
 - a. Elder Abuse Hotline: 800-392-0210
 - b. For copies of the MO “Elder Abuse – It’s A Crime” booklet: 573-526-8557 or go to <http://www.dhss.mo.gov>; click on “Senior Services” and scroll to bottom right of page to download.