

Department of Health & Human Services  
Centers for Medicare & Medicaid Services

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No. 0938-0391

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| STATEMENT OF DEFICIENCIES<br>AND PLAN OF CORRECTION  | (X1) PROVIDER/SUPPLIER/CLIA<br>IDENTIFICATION NUMBER:<br><br>065241   | (X2) MULTIPLE CONSTRUCTION<br><br>A. Building<br>B. Wing                           | (X3) DATE SURVEY<br>COMPLETED<br><br>09/28/2023 |
| NAME OF PROVIDER OR SUPPLIER<br><br>Hilltop Park Post Acute  |   | STREET ADDRESS, CITY, STATE, ZIP CODE<br><br>290 S Monaco Pkwy<br>Denver, CO 80224 |   |
| For information on the nursing home's plan to correct this deficiency, please contact the nursing home or the state survey agency. |   |  |   |
| (X4) ID PREFIX TAG   | SUMMARY STATEMENT OF DEFICIENCIES<br>(Each deficiency must be preceded by full regulatory or LSC identifying information)   |  |   |
| F 0883<br><br>Level of Harm - Minimal harm<br>or potential for actual harm<br><br>Residents Affected - Some                        | <p>Develop and implement policies and procedures for flu and pneumonia vaccinations.</p> <p><b>**NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDENTIALITY** 20287</b></p> <p>Based on record review and staff interviews, the facility failed to implement policies and procedures related to pneumococcal immunizations for six (#1, #2, #3, #5, #6 and #8) of eight residents reviewed for immunizations out of eight sample residents.</p> <p>Specifically, the facility failed to:</p> <ul style="list-style-type: none"><li>-Offer Resident #1 and #8 the pneumococcal vaccine upon admission;</li><li>-Offer additional doses of the pneumococcal vaccine to Resident #2, #3 and #5; and,</li><li>-Have a signed consent of a refusal for Resident #6.</li></ul> <p>Findings include:</p> <p>I. Professional reference</p> <p>According to the Centers for Disease Control and Prevention (CDC) Recommended Immunization Schedule for Adults Aged [AGE] years or Older, United States, 2023, retrieved on 9/28/23, from: <a href="https://www.cdc.gov/vaccines/schedules/downloads/adult/adult-combined-schedule.pdf">https://www.cdc.gov/vaccines/schedules/downloads/adult/adult-combined-schedule.pdf</a>, in pertinent part: Routine vaccination - pneumococcal</p> <ul style="list-style-type: none"><li>-For those ages 19 or older with an additional risk factor or another indication was: One (1) dose PCV15 (pneumococcal 15-valent conjugate vaccine PCV15 Vaxneuvance) followed by PPSV23 (pneumococcal 23-valent polysaccharide vaccine PPSV23 Pneumovax 23) or one (1) dose PCV20 (pneumococcal 20-valent conjugate vaccine PCV20 Prevnar 20). (see notes)</li><li>-For those over the age of 65 who meet age requirement and lack documentation of vaccination, or lack evidence of past infection was: One (1) dose PCV15 followed by PPSV23 or one (1) dose PCV20.</li></ul> <p>(continued on next page)</p> |  |   |

Any deficiency statement ending with an asterisk (\*) denotes a deficiency which the institution may be excused from correcting providing it is determined that other safeguards provide sufficient protection to the patients. (See instructions.) Except for nursing homes, the findings stated above are disclosable 90 days following the date of survey whether or not a plan of correction is provided. For nursing homes, the above findings and plans of correction are disclosable 14 days following the date these documents are made available to the facility. If deficiencies are cited, an approved plan of correction is requisite to continued program participation.

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER  
REPRESENTATIVE'S SIGNATURE

TITLE

(X6) DATE

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| <p>F 0883</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Some</p>                    | <p>Special situations: Age 19-[AGE] years with certain underlying medical conditions or other risk factors who have not previously received a pneumococcal conjugate vaccine or whose previous vaccination history is unknown: One (1) dose PCV15 or one (1) dose PCV20. If PCV15 is used, this should be followed by a dose of PPSV23 given at least 1 year after the PCV15 dose. A minimum interval of 8 weeks between PCV15 and PPSV23 can be considered for adults with an immunocompromising condition, cochlear implant, or cerebrospinal fluid leak to minimize the risk of invasive pneumococcal disease caused by serotypes unique to PPSV23 in these vulnerable groups.</p> <p>-Note: Immunocompromising conditions include chronic renal failure, nephrotic syndrome, immunodeficiency, iatrogenic immunosuppression, generalized malignancy, human immunodeficiency virus (HIV), Hodgkin disease, leukemia, lymphoma, multiple myeloma, solid organ transplants, congenital or acquired asplenia, sickle cell disease, or other hemoglobinopathies.</p> <p>-Note: Underlying medical conditions or other risk factors include alcoholism, chronic heart/liver/lung disease, chronic renal failure, cigarette smoking, cochlear implant, congenital or acquired asplenia, CSF (cerebral spinal fluid) leak, diabetes mellitus, generalized malignancy, HIV, Hodgkin disease, immunodeficiency, iatrogenic immunosuppression, leukemia, lymphoma, multiple myeloma, nephrotic syndrome, solid organ transplants, or sickle cell disease or other hemoglobinopathies.</p> <p>II. Facility policy</p> <p>The Pneumococcal Vaccine policy, revised March 2022 was provided by the nursing home administrator (NHA) on 9/28/23. It read in pertinent part, All residents are offered pneumococcal vaccines to aid in preventing pneumonia/pneumococcal infections. Prior to or upon admission, residents will be assessed for eligibility to receive the pneumococcal vaccine series, and when indicated, will be offered the vaccine series within thirty (30) days of admission to the facility unless medically contraindicated or the resident has already been vaccinated. Administration of the pneumococcal vaccines or revaccinations will be made in accordance with current Centers for Disease Control and Prevention (CDC) recommendations at the time of the vaccination.</p> <p>III. Resident #1</p> <p>A. Resident #1</p> <p>Resident #1, age 70, was admitted on [DATE]. According to the September 2023 computerized physician orders (CPO) diagnoses included chronic obstructive pulmonary disease, dysphasia and dementia.</p> <p>The 8/22/23 minimum data set assessment (MDS) revealed Resident #1 had memory impairments and had moderately impaired decision making.</p> <p>-The MDS inaccurately documented, that the resident was offered and declined the pneumococcal vaccination.</p> <p>B. Record review</p> <p>A review of Resident #1's electronic medical record (EMR) revealed the immunization tracking sheet did not show the resident received the pneumococcal vaccination.</p> <p>(continued on next page)</p> |  |   |

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| <p>F 0883</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Some</p>                    | <p>-The EMR failed to show that the resident had not been offered the pneumococcal vaccination on admission.</p> <p>The Colorado Immunization Information System (CIIS) showed the PPSV23 was recommended on 7/6/22</p> <p>IV. Resident #2</p> <p>A. Resident #2</p> <p>Resident #2, age 89, was admitted on [DATE]. According to the September 2023 CPO diagnoses included chronic obstructive pulmonary disease, palliative care and heart failure.</p> <p>The 8/23/23 minimum data set assessment (MDS) revealed Resident #2 was cognitively intact with a brief interview for mental status (BIMS) score of 15 out of 15.</p> <p>-The MDS assessment inaccurately documented the resident was offered and declined the pneumococcal vaccination.</p> <p>-However, a review of Resident #2's electronic medical records (EMR) revealed the resident had not been offered the pneumococcal vaccine.</p> <p>B. Record review</p> <p>A review of Resident #2's electronic medical record (EMR) revealed the immunization tracking sheet showed the resident refused both the Prevnar 13 and the Polysaccharide (PPSV23) 23.</p> <p>-However, the immunization tracking sheet had no date did not show the resident received the pneumococcal vaccination.</p> <p>-The EMR showed a consent which he signed as a decline, however, there is no date of when it was signed. There was no evidence that the resident had been offered the pneumococcal vaccine any other date.</p> <p>V. Resident #3</p> <p>Resident #3, age 89, was admitted on [DATE]. According to the September 2023 CPO diagnoses included hemiplegia and hemiparesis (paralysis) following unspecified cerebrovascular disease (stroke) affecting left non-dominant side and osteoarthritis.</p> <p>The 7/5/23 minimum data set assessment (MDS) revealed Resident #3 had moderate cognitive impairment with a brief interview for mental status (BIMS) score of eight out of 15.</p> <p>-The MDS assessment inaccurately documented the resident was up to date on the pneumonia vaccination.</p> <p>B. Record review</p> <p>(continued on next page)</p> |  |   |

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| <p>F 0883</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Some</p>                    | <p>The immunization record showed the resident received pneumovax dose 1 on 1/1/05. The resident received the Prevnar 13 on 1/17/18.</p> <p>-There was no evidence that the resident had been offered the pneumococcal vaccine any other date.</p> <p>VI. Resident #5</p> <p>A. Resident #5</p> <p>Resident #5, age 93, was admitted on [DATE]. According to the September 2023 CPO diagnoses included legal blindness, vascular dementia and hypertension.</p> <p>The 7/26/23 minimum data set assessment (MDS) revealed Resident #5 was cognitively intact with a brief interview for mental status (BIMS) score of 15 out of 15.</p> <p>-The MDS assessment inaccurately documented the resident was up to date on the pneumonia vaccination.</p> <p>B. Record review</p> <p>The immunization record showed the resident received pneumovax dose 1 on 3/22/10. The resident received the Prevnar 13 on 7/5/16.</p> <p>-There was no evidence the resident was offered the Prevnar 20.</p> <p>VII. Resident #6</p> <p>Resident #6, age 77, was admitted on [DATE]. According to the September 2023 CPO diagnoses included, traumatic subarachnoid hemorrhage without loss of consciousness, epilepsy, and history of brain injury.</p> <p>The 9/5/23 minimum data set assessment (MDS) failed to assess the residents mental status.</p> <p>The MDS assessment documented the resident was offered and declined the pneumococcal vaccination.</p> <p>B. Record review</p> <p>The immunization record documented, the resident refused the pneumococcal vaccination, however, there was no date. Although, the EMR failed to show a consent which showed the resident refused.</p> <p>VIII. Resident #8</p> <p>Resident #8, age 71, was admitted on [DATE]. According to the September 2023 CPO diagnoses included disorder of kidney, benign prostatic hyperplasia, and cerebral infarction.</p> <p>The 7/20/23 minimum data set assessment (MDS) revealed Resident #8 had severe cognitive impairments with a brief interview for mental status (BIMS) score of six out of 15.</p> <p>(continued on next page)</p> |  |   |

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| <p>F 0883</p> <p>Level of Harm - Minimal harm or potential for actual harm</p> <p>Residents Affected - Some</p>                    | <p>-The MDS assessment inaccurately documented the resident was offered and declined the pneumococcal vaccination.</p> <p>B. Record review</p> <p>-The EMR failed to show any evidence the resident had been offered the pneumococcal vaccination.</p> <p>XI. Staff interviews</p> <p>The director of nurses (DON) and the nursing home administrator (NHA) were interviewed on 9/28/23 at 11:30 a.m. The DON said the facility offered residents pneumonia vaccinations. She said at admission the resident's vaccination record was obtained. She said that Colorado Immunization Information System (CIIS) was utilized. She said the admitting nurse would then offer and provide education to the resident in regard to the importance of being vaccinated against pneumonia.</p> <p>She said if the resident accepted the pneumonia vaccination then the consent was signed and the vaccination was administered after receiving the physician's order. She said that if the resident refused then the resident signed the consent form. She said she wanted the resident to ask again in a few days after refusal, as the resident may of not been feeling well or may not of understood. If they refuse again, then the resident should be asked annually.</p> <p>The DON and the infection preventionist (IP) were interviewed again on 9/28/23 at 12:00 p.m. The DON said she reviewed the medical records for the specific residents (see above). She said the CIIS was not utilized. She said it was only used for Resident #1. She said reviewing the other records, she said there were different issues with each of the resident's pneumococcal vaccinations. The DON said that if a resident refused, the signed consent needed to be in the medical record and dated. She said they would complete an audit to ensure vaccination records were up to date.</p> |  |   |