(X1) PROVIDER/SUPPLIER/CLIA

IDENTIFICATION NUMBER:

STATEMENT OF DEFICIENCIES

AND PLAN OF CORRECTION

(X2) MULTIPLE CONSTRUCTION

PRINTED: 05/30/2018 FORM APPROVED OMB NO. 0938-0391

(X3) DATE SURVEY

COMPLETED

A. BUILDING 01 055523 B. WING 05/23/2018 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE 250 N. VERDUGO ROAD **GLENDALE POST ACUTE CENTER** GLENDALE, CA 91206 SUMMARY STATEMENT OF DEFICIENCIES PROVIDER'S PLAN OF CORRECTION (X5) ID (X4) ID COMPLETION (EACH DEFICIENCY MUST BE PRECEDED BY FULL PRFFIX (EACH CORRECTIVE ACTION SHOULD BE PRÉFIX DATE CROSS-REFERENCED TO THE APPROPRIATE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG TAG DEFICIENCY) E 000 Initial Comments E 000 The following reflects the findgins of the Glendale Post Acute Center submits California Department of Public Health, during an this response and plan of correction as Emergency Preparedness recertification survey. part of the requirements under state The findings are in accordance with 42 Code of and federal law. The plan of Federal Regulations (CFR) 483.73, Requirement correction is submitted in accordance for Long Term Care (LtC) Facilities. with specific regulatory requirements. It shall not be construed as admission Representing the California Department of Public of any alleged deficiency cited or any Health: 14041 liability. The provider submits this The facility is in substantial compliance with 42 plan of correction with the intention CFR 483.73 for Long Term Care (LTC) Facilities. that it is inadmissible by any third K 000 party in any civil or criminal action or K 000 INITIAL COMMENTS proceedings against the provider or its employees, agents, officers, directors, This facility was surveyed under the Life Safety Code NFPA 101, 2012 Edition, Chapter 19, or shareholders. Existing Health Care Occupancies, and other The provider reserves the right to applicable codes. challenge the cited findings if at any time the provider determines that the Representing the Department of Public Health: disputed findings are relied upon in a 14041 manner adverse to the interests of the provider either by the governmental The following represents the findings of the agencies or third party. Department of Public Health during a Life Safety Any changes to provider policy or Code Survey. K 300 procedures should be considered to be Protection - Other K 300 CFR(s): NFPA 101 subsequent remedial measures as that SS=F concept is employed in Rule 407 of Protection - Other the federal rules of evidence and List in the REMARKS section any LSC Section California evidence Code Section 18.3 and 19.3 Protection requirements that are 1151 and should be inadmissible in not addressed by the provided K-tags, but are any proceeding on that basis. deficient. This information, along with the applicable Life Safety Code or NFPA standard co citation, should be included on Form CMS-2567. LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE TITLE (X6) DATE

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.

	OF DEFICIENCIES OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:	(X2) MUL A. BUILD		E CONSTRUCTION 01	(X3) DATE SURVEY COMPLETED		
	•	055523	B. WING			05/	23/2018	
	PROVIDER OR SUPPLIER ALE POST ACUTE CE	NTER		STREET ADDRESS, CITY, STATE, Z 250 N. VERDUGO ROAD GLENDALE, CA 91206				
(X4) ID PREFIX TAG	(EACH DEFICIENC)	TEMENT OF DEFICIENCIES Y MUST BE PRECEDED BY FULL SC IDENTIFYING INFORMATION)	ID PREFI TAG		PROVIDER'S PLAN OF CORRECTIO (EACH CORRECTIVE ACTION SHOULD CROSS-REFERENCED TO THE APPROP DEFICIENCY)) BE	(X5) COMPLETION DATE	
K 300	Continued From pa	ge 1	K3	300	•	,		
	by: NFPA 25, 2011 Ed 5.3 Testing. 5.3.1* Sprinklers. 5.3.1.1* Where req sprinklers shall be s testing laboratory a having jurisdiction (5.3.1.1.1 Where sp for 50 years, they s representative sam areas shall be teste 5.3.1.1.1.1 Test pro 10-year intervals. Based on observati failed to assure any were sample tested NFPA. Findings:	uired by this section, sample submitted to a recognized cceptable to the authority (AHJ) for field service testing. rinklers have been in service hall be replaced or ples from one or more sample ed. cedures shall be repeated at on and interview, the facility of fire sprinklers over 50 years I and replaced as required by			How corrective action will be accomplished for those residents found to have been affected by the deficient practice; On 05/16/2018, the Administrator contacted 3 different companies an requested quotations for testing of Fire Sprinklers as per regulation. To Contractor was chosen on 6/5/2018 and will be conducting the Sprinklet testing after approval by OSHPD. How the facility will identify other residents having the potential to affected by the same deficient practice does not recur; No resident was identified to be affected of the deficient practice.	d the The S	6/9/2018	
	inspection of the Lift observed that the fat evaluator requested annual and 5-year in maintenance documents	nents.			What measures will be put into place or what systemic changes we the facility make to ensure that the deficient practice does not recurred.	he		
	document, dated 10 asked the building s that appeared to be sampled and/or test laboratory acceptable.	wed the 5-year fire sprinkler 0/14/2015. The evaluator supervisor if the fire sprinklers over 50 years old have been ted by an approved testing le to the AHJ. The building I that he was new and did not			The Maintenance Supervisor will conduct weekly sprinkler checks to ensure that all sprinklers meet the safety regulations.			

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K 346 SS=F	have any informatic sprinklers. The evaluator inspedifferent age types The evaluator required fire sprink having jurisdiction. provided at the time In case of fire emerbe tested, serviced, condition at all time basis. The fire sprintested and/or replact to the authority having documentation shaltimes. Fire Alarm System CFR(s): NFPA 101 Fire Alarm - Out of Where required fire services for more the period, the authority notified, and the build approved fire watch parties left unproted fire alarm system have 16.1.6 This REQUIREMENT by: Based on interview failed to establish a when the fire alarm more than 4 hours in event the fire alarm in event the fire alarm.	ected the facility and observed of new and old fire sprinklers. ested documentation of the lers approved by the authority No documentation was e of the survey. In gency, the fire sprinklers shall and maintained in optimal at a minimum at an annual nklers over 50 years shall be deed by a laboratory acceptable ing juridiction and the left be available to the AHJ at all -Out of Service	K 34	Quarterly sprinkler system will be conducted by GNA FIRE SYST INC. The Administrator provided a 1:1 service to the Maintenance Super on 5/16/2018 regarding Sprinkler Safety, policy and procedures and testing schedule. Administrator will validate comp randomly during monthly facility rounds. Outcome will be discuss with Maintenance Resource for fup.	in- visor d liance ed ollow or its	6/9/2018

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	emergency proced to notify the author watch. Findings: On 5/23/2018, the of the facility's fire regards to an inope 4-hours over a 24-l At 2:00 p.m., an intadministrator and spolicy and procedu the time of this repeated not been forward to the time of the forward to the for	evaluator requested a review watch policy and procedure in erable fire alarm system for hour period. erview was conducted with the she stated she did not have the re at the time of the survey. At ort, the policy and procedure arded to the department. ice affected 5 of 5 smoke and procedure arded to the department. ice affected 5 of 5 smoke and procedure arded to the department. ice affected 5 of 5 smoke and procedure arded to the above findings during the exit conference tor. Out of Service To system is impaired, the of the impairment has been or buildings involved are	KS	346	How corrective action will be accomplished for those residents found to have been affected by the deficient practice; The Fire Watch Policy when the fir alarm system is out was developed and included in the Facility Policy binder by the Administrator on 5/30/2018. How the facility will identify other residents having the potential to affected by the same deficient practice does not recur; Facility checked for other policies related to this deficient practice and issues were found. What measures will be put into place or what systemic changes we the facility make to ensure that the deficient practice does not recur; On 6/1/2018 the Administrator provided an in-service to staff regarding fire safety, policy and procedures.	er be I no	6/9/2018

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K 354 K 363 SS=D	approved fire watch system has been re 18.3.5.1, 19.3.5.1, 9.3.5.1	is provided until the sprinkler eturned to service. 2.7.5, 15.5.2 (NFPA 25) It is not met as evidenced and record review, the facility detailed fire watch policy the system is out of service for in a 24-hour period. In the the system is out of service, a lassist with the appropriate watch be implemented, and by having jurisdiction of the fire evaluator requested a review watch policy and procedure in rable fire sprinkler system for thour period. Enview was conducted with the ne stated she did not have the se at the time of the survey. At ort, the policy and procedure raded to the department. The affected 5 of 5 smoke and procedure raded to the department.	K 3		Maintenance Supervisor/DSD will validate fire watch policy informat and availability once a month. How the facility plans to monitor performance to make sure that solutions are sustained. The Administrator will provide a summary trend analysis of negative findings to the monthly QAPI Committee meeting. If there are n negative findings reported after on quarter, issue is considered resolved. Date of compliance: 6/9/2018	ion its	6/9/2018

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K 363	Doors protecting corequired enclosures hazardous areas re and are made of 1 awood or other mate at least 20 minutes. smoke compartment the passage of smoto rooms containing materials have posilatches are prohibitor equirements do not contain flamic Clearance between covering is not exceomplying with 7.2. with a device capab when a force of 5 lb impediment to the devices that release pulled are permitted of unlimited height a meeting 19.3.6.3.6 shall be labeled and materials in complias moke compartment window assemblies sprinklered compartment window assemblies sprinklered compartment in window as 19.3.6.3, 42 CFR Parand 485 Show in REMARKS protection ratings, a etc. This REQUIREMENT.	priridor openings in other than sof vertical openings, exits, or sist the passage of smoke 3/4 inch solid-bonded core rial capable of resisting fire for Doors in fully sprinklered at are only required to resist oke. Corridor doors and doors a flammable or combustible tive latching hardware. Roller ed by CMS regulation. These that apply to auxiliary spaces that mable or combustible material. Bottom of door and floor ending 1 inch. Powered doors 1.9 are permissible if provided alle of keeping the door closed of is applied. There is no closing of the doors. Hold open as when the door is pushed or and the permitted. Dutch doors are permitted. Dutch doors are permitted. Door frames are permitted. Door frames are permitted. Fixed fire are allowed per 8.3. In the tis sprinklered. Fixed fire are allowed per 8.3. In the there are no or fire resistance of glass or seemblies. The part of the doors such as fire utomatics closing devices, arts 403, 418, 460, 482, 483, details of doors such as fire utomatics closing devices, art is not met as evidenced.	K 3	63	How corrective action will be accomplished for those residents found to have been affected by the deficient practice; The Fire Watch Policy and the Sprinkler System Policy when the sprinkler system is out was develor and included in the Facility Policy binder by the Administrator on 5/30/2018. How the facility will identify other residents having the potential to affected by the same deficient practice does not recur; Facility checked for other policies related to this deficient practice and issues were found. What measures will be put into place or what systemic changes with facility make to ensure that the deficient practice does not recur; On 6/1/2018 the Administrator provided an in-service to all staff regarding fire safety and Sprinkler System policy and procedures.	ped er be	6/9/2018
	Based on observati	on and interview, the facility					

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a.		055523	B. WING		05	/23/2018
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K 372 SS=F	failed to ensure that room was able to re impediment to rapid emergency, rapid of impediments, is an containment of smooth of 5 smoke compartments. On 5/16/2018, at 12 code tour of the fact the corridor door to wedge that prevent closing. The deficiency affect compartments. On was brought to the during the exit conform Subdivision of Build CFR(s): NFPA 101 Subdivision of Build Construction 2012 EXISTING Smoke barriers shafire resistance rating be permitted to term Smoke dampers and penetrations in fully an approved sprink smoke compartments barrier. 19.3.7.3, 8.6.7.1(1) Describe any mech in REMARKS.	at the corridor door to the MDS esist smoke by having an diclosing. In the event of a fire closure of doors, without any essential component in the oke and/or fire. This affected eartments 2:30 p.m., during a life safety sility, the evaluator observed the MDS room had a door ed the door from automatically content of the smoke of 5/23/2018, the deficiency attention to the administrator	K 3	How the facility plans to a performance to make sur solutions are sustained. The Administrator will prosummary trend analysis of findings to the monthly QA Committee meeting. If the negative findings reported quarter, issue is considered Date of compliance: 6/9/20 K 363 How corrective action will accomplished for those refound to have been affect.	vide a negative API re are no after one resolved. 118 Il be esidents ed by the dge on the y removed visor. tify other ntial to be cient ance com check rs were other doors	6/9/2018

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NAME OF F	PROVIDER OR SUPPLIER			STREET ADDRESS, CITY, STATE,	ZIP CODE		
GLENDA	LE POST ACUTE CE	NTER		250 N. VERDUGO ROAD GLENDALE, CA 91206			
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	by: Based on observate failed to maintain a least one-half hour through one smoke penetrations on smocompromise the introcompartments, there easily between smotifire emergency. The formula of 5 smoke compartions of 5 smoke compartions of 5 smoke compartions. On 5/23/2018, at 11 conducted an insperied walls located over 2. The evaluator check located near Room barrier wall had unspenetrations were in caulking. The evaluations were incaulking. The evaluations were incaulking. The evaluations located doors located near large section of the out. On 5/23/2018, the finduring the exit confeadministrator.	ion and interview, the facility fire resistance rating of at by having penetrations barrier wall. Unsealed oke barrier walls may egrity of the smoke eby, allowing smoke to travel oke compartments, during a ne deficient practice affected 4	K 3	What measures will be place or what systemic the facility make to ens deficient practice does On 5/16/2018, the Admit provided an in-service to regarding automatic door procedures with emphase propping doors open with objects. Department Heads will a for obstruction during darounds 5x/week and find discussed in the daily Stameeting. How the facility plans a performance to make a solutions are sustained. The Maintenance Supert Administrator will conditioned and randomly piecheck doors to ensure not service to the sustained.	changes will sure that the not recur; inistrator o staff ors policy and is on not th any wedges/ monitor doors aily room dings will be and up to monitor its sure that . visor and/or uct monthly ck rooms and		
	Maintenance and Te The generator or of	Essential Electric System esting ther alternate power source ipment is capable of supplying					

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K 918	service within 10 secriterion is not met of process shall be processed shall be processed in the proce	econds. If the 10-second during the monthly test, a byided to annually confirm this esafety and critical branches. Esting of the generator and reperformed in accordance inspected weekly, exercised tes 12 times a year in 20-40 xercised once every 36 years include a complete and automatic or manual oads, and are conducted by the el. Maintenance and testing of the sources (Type 3 EES) are in EPA 111. Main and feeder inspected annually, and a cally exercising the blished according to the ements. Written records of sting are maintained and the electrical panels and readily identifiable, and all power circuits. Minimizing mage of the emergency power consideration for new the service of the emergency power consideration for new the service of the emergency power consideration for new the service of the emergency power consideration for new the service of the emergency power consideration for new the service of the emergency power consideration for new the service of the emergency power consideration for new the service of the emergency power consideration for new the service of the emergency power consideration for new the service of t	KS	918	The Administrator and/or Designer will provide a summary trend analy of negative findings to the monthly QAPI Committee meeting. If there no negative findings reported after quarter, issue is considered resolved. Date of compliance. 6/9/2018 K 372 How corrective action will be accomplished for those residents found to have been affected by the deficient practice; On 5/23/2018, the penetrations near room 40 and room 11 were sealed the Maintenance Supervisor with fretardant caulking. How the facility will identify other residents having the potential to affected by the same deficient practice does not recur; On 5/23/2018, the Administrator a Maintenance Supervisor did a complete facility check to ensure there are no other unsealed penetrations. No other penetration were found to be affected by this deficient practice.	ysis e are one od. he r be he hat	6/9/2018

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K 918	than 20 days nor m sets serving essent tested in accordance Emergency and State Chapter 8. (B) Test Conditions load conditions sha simulated cold start and manual transfersystem loads. (C) Test Personnel. conducted by compart machines ready to be to detect causes of personnel in operate 6.4.4.1.3 Maintenary on-site generators accordance with NFE Emergency and State 6.4.4.2 Record Kee inspection, perform repairs shall be registed available for inspective inspection. 6.5 Essential Electromy 2. 6.5.4.1.1.2 Inspections sets shall be inspective with 6.4.4.1.1.3. 6.5.4.1.3 Maintenant Circuitry shall be maccordance with 6.4.6.5.4.1.3 Maintenant be maintained in accordance with 6.4.0.5.4.2 Record Kee inspection, performance in shall be registered in spection, performance in shall be registered in spection.	ore than 40 days. Generator ial electrical systems shall be the with NFPA 110, Standard for andby Power Systems, The scheduled test under ill include a complete and appropriate automatic or of all essential electrical. The scheduled tests shall be retent personnel to keep the function and, in addition, serve malfunction and to train ing procedures. In the scheduled tests shall be maintained in the interpolation and to train ing procedures. In the scheduled tests shall be maintained in the interpolation and to train ing procedures. In the interpolation is procedured in the interpolation in	K 9	118	What measures will be put into place or what systemic changes we the facility make to ensure that the deficient practice does not recur; On 5/23/2018, the Administrator provided an in-service to Maintenant staff regarding monitoring and reporting of any unsealed penetration and walls. Department Heads will monitor for chipped walls during the daily room rounds 5x/week. Finding will be discussed in the daily Stand meeting. How the facility plans to monitor performance to make sure that solutions are sustained. The Administrator will validate compliance randomly during weekly facility walking rounds. Outcome we be discussed with the Maintenance Resource. The Administrator / Designee will provide a summary trend analysis on negative findings to the monthly QAC Committee meeting.	nce ons ne ngs up its	6/9/2018

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K 918	Continued From pa		KS	918	If there are no negative findings reported after one quarter, issue is considered resolved.		6/9/2018	
		Maintenance and Operational			Date of Compliance: 6/9/2018			
	8.1.1 The routine m	naintenance and operational all be based on all of the	· .		<u>K 918</u>		•	
	(1) Manufacturer's recommendations (2) Instruction manuals (3) Minimum requirements of this chapter (4) The authority having jurisdiction Based on observation, interview, and record review, the facility failed to ensure the back-up source of emergency power was serviced, maintained, and tested on load based on the manufacturer's recommendation. The facility failed to provide a detailed policy and procedure to the staff in charge of the generator in regards to the monthly load test, weekly battery condition and voltage inspections. The facility failed to				How corrective action will be accomplished for those residents found to have been affected by the deficient practice;	ie		
					On 5/18/2018 the generator was cleaned by Sweinhart Electric Company and new battery was installed. The Generator service reperformed on 4/03/2018 addressed fixed all concerns mentioned on the report for 9/12/2017, 12/6/2017 and 12/18/2017.	and e		
		or was maintained in optimal manner, i.e. carburetor and			How the facility will identify other residents having the potential to affected by the same deficient practice does not recur;			
	inspection of the Lif facility is a 1-story b rated smoke compa	he evaluator conducted an e Safety Code system. The building, with 4-sets of fire artment doors, 5- smoke undry room, and the generator ck of the facility.			No other systems noted with defici practice.	ent.		
	and inspected the g generator was very	ucted a tour of the building enerator and observed the dirty and oily. The generator nd oil on the contact surfaces.				•		

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K 918	The battery is a ma was also dirty. The gas capacity.	intenance free battery and it generator had a 20-gallon	Ks	918	What measures will be put into place or what systemic changes we the facility make to ensure that the deficient practice does not recur;	he	6/9/2018
	generator's service record. The evaluator noted technician documer "Engine start wire ware Tightened terminal rich based on spark observation. Auton fully which is contribulity which is contribulity which is contribuled (#3) was compfound cold after operellacement. Record carburetor and proving the carburetor and proving the carburetor and grown mechanism. Parts difficult to find." da crank no start, carburetor not avail "trouble shoot Kohle crank no start. Carfluid that customer ether system and grown to the control of the	ommend to rebuild the vide an alternate choke for this choke is obsolete and sted - 12/6/2017, Generator suretor flooding from starting had installed. Disconnected enerator starts and runs but onds. Adjustment on able." dated - 12/18/2017, er running rough, generator buretor flooding from starting had installed. Disconnected enerator starts and runs but onds. Adjustment on able." The evaluator did not e and maintenance notation natic transfer switch (ATS) naintenance record on any of			The Administrator in-serviced the Maintenance Supervisor on 05/18/2018 regarding Generator servicing, policy and procedures. The Maintenance Supervisor will inspect and run the Generator at fulload on a weekly basis. Any issues will be communicated to Sweinhart Electric Company. Sweinhart Electric Company will perform complete Generator testing twice a year. Findings will be discussed with the Administrator for follow through. How the facility plans to monitor performance to make sure that solutions are sustained. Administrator will check generator log monthly to monitor compliance.	t ric	
		wed the monthly generator's entation, dated 4/25/2018,					

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION (X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: (X2) MULTIPLE CON A. BUILDING 01				UCTION			E SURVEY PLETED	
		055523	B. WING_			<u>.</u>	05/2	23/2018
	PROVIDER OR SUPPLIER		STREET ADDRESS, CITY, STATE, ZIP CODE 250 N. VERDUGO ROAD GLENDALE, CA 91206			ATE, ZIP CODE		
(X4) ID PREFIX TAG	(EACH DEFICIENCY	TEMENT OF DEFICIENCIES MUST BE PRECEDED BY FULL SC IDENTIFYING INFORMATION)	ID PROVIDER'S PLAN OF CORREC PREFIX (EACH CORRECTIVE ACTION SHO TAG CROSS-REFERENCED TO THE APPR DEFICIENCY)			Æ ACTION SHOULD D TO THE APPROPI	BE	(X5) COMPLETION DATE
K 918	and did not observe battery's voltage or The evaluator obser "battery water level"	any notation regarding the the generator's run clock. rved a section that read however, the battery is a attery and the water level	K 91	provide negative Commit negative	a summary to e findings to tee meeting. e findings rep	r designee will rend analysis o the monthly QA If there are no ported after one sidered resolved	API	
	of the generator tes policy and procedur	evaluator requested a review t, service, and maintenance e and the generator's The generator's manual was time of the survey.		Date of	Compliance	6/9/2018	•	
	#6- the run time for load, will be docume time. Example: 10:3 Administrator shall I repairs, and delays generator. No guide	wed the policy and it revealed: the generator test, under full ented as to start time and stop 30 - 11:00; #9 - The be notified of all problems, in starting that occur with the eline was provided in regards attery, i.e. maintenance free						
	maintenance supervonly started about 3 The generator shall maintained on the m	Ti da			·			
	available for review jurisdiction (AHJ). In case of a loss of shall be maintained carburetor, based or recommendation an weekly inspection sl	normal power, the generator in optimal condition, i.e. in the manufacturer's in a timely manner. The hall include the generator's acity or level, the generator's				•.		

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:	A. BUIL		TIPLE CONSTRUCTION ING 01		(X3) DATE SURVEY COMPLETED	
055523			B. WIN	B. WING			05/23/2018	
NAME OF PROVIDER OR SUPPLIER GLENDALE POST ACUTE CENTER				STREET ADDRESS, CITY, STATE, ZIP CODE 250 N. VERDUGO ROAD GLENDALE, CA 91206				
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)			FIX G	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD CROSS-REFERENCED TO THE APPRODEFICIENCY)	ILD BE COMPLETION		
K 918	run clock not the tin and maintained on manufacturer's reco shall develop and p for the staff in charg the manufacturer's	ne. The ATS shall be servi an annual basis based on ommendation. The facility rovide a policy and proced ge of the generator based of recommendation and by the authority having	ced the ure	918				
				•			·	
•								