San Francisco Health Network
Laguna Honda Hospital
and Rehabilitation Center

# Laguna Honda Hospital Closure Plan and CMS Recertification Update

Roland Pickens MHA, FACHE

September 20, 2022

# About Laguna Honda

## The largest publicly-run skilled nursing facility in the country

- For more than 150 years, Laguna Honda has been a pillar of San Francisco's healthcare system, providing healthcare services to approximately 700 residents.
- The hospital cares for people coping with the effects of complex or chronic conditions such as stroke, traumatic brain injury or degenerative diseases such as multiple sclerosis.

- Rehabilitative services include physical therapy, occupational therapy, speech therapy and audiology.
- Specialized care includes monolingual care in Spanish and Chinese, palliative care, positive care (AIDS/HIV) and memory care.

# Status Update

## De-Certification with CMS in April 2022

- Laguna Honda has an obligation to report many types of incidents with the goal of improving care. In 2021, Laguna Honda self-reported two non-fatal overdoses, which resulted in several surveys.
- The Centers for Medicare and Medicaid Services (CMS), as a result of those surveys, found the hospital out of substantial compliance.
- In April of 2022, CMS terminated Laguna Honda's participation in the Medicare and Medicaid Provider Participation Programs.
- CMS Reimbursements fund the majority of resident care, accounting for approximately $550k a day or more than $200 million annually.

# Status Update

## The Path to Recertification with CMS

- Laguna Honda continues to work hard to meet all regulatory requirements and make rapid improvements to prepare for recertification.
- This includes long-term operational, institutional, and cultural changes needed to achieve recertification and to ensure the long-term success of the hospital.
- Certification experts conducted a comprehensive organizational assessment and made recommendations on gaps and improvements, and Laguna Honda is implementing those improvements and tracking to ensure sustainability.
- Between the Laguna Honda staff and expert consultants, we are confident we have the team in place for a successful recertification.

# Closure Plan - *Paused*

## Extension of Pause in Transfers/Discharges of Residents and Medicaid/Medical Payments

- May 14: The Centers for Medicare and Medicaid Services (CMS),and the California Department of Public Health (CDPHD required implementation of Closure and Patient Transfer and Relocation Plan to be completed by September 13, when Medicaid/Medicare funding would be halted.
- July 28: Regulators agreed to a request by the City to pause all transfers and discharges. A total of 57 transfers and discharges occurred as part of the Closure Plan.
- August 15: Laguna Honda reached an agreement with CMS and CDPH to extend Medicare and Medicaid payments to patients until November 13 and to continue the Closure Plan pause during this extension.
- During this pause, resident-initiated transfers and discharges will continue to occur, which is a right our residents are entitled to and aligned with hospital policy.

# CMS Recertification

## Preparing the Facility for Recertification

- Laguna Honda continues to work hard to meet all regulatory requirements. We are making rapid improvements to prepare for recertification.
- This includes long-term operational, institutional, and cultural changes needed to achieve recertification and to ensure the long-term success of the hospital.
- Certification experts are conducting a comprehensive organizational assessment and making recommendations on gaps and improvements, and Laguna Honda is implementing those improvements and tracking to ensure sustainability.

# CMS Recertification

## The First Mock Survey and Corrective Actions

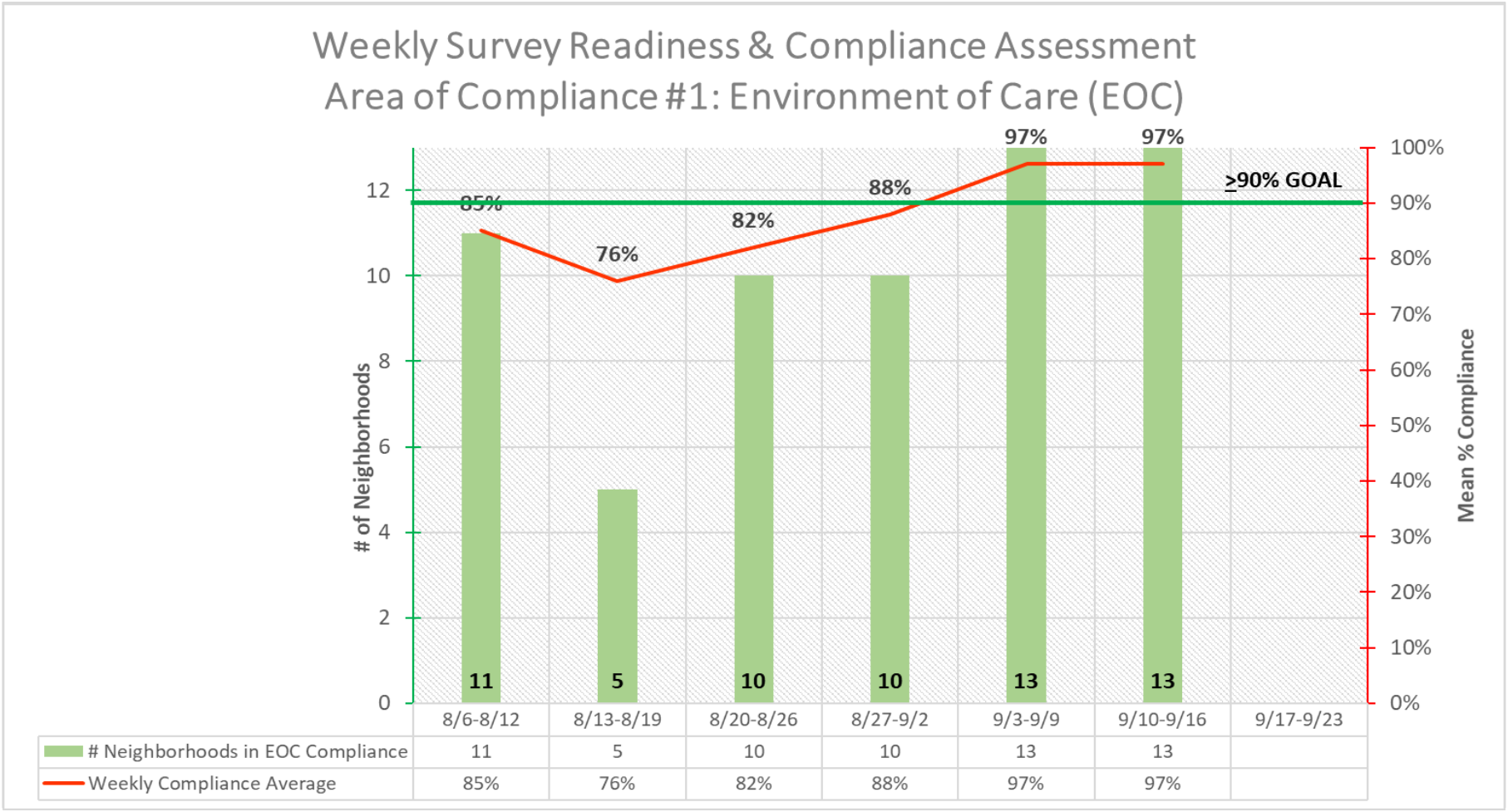
- Laguna Honda completed the first mock survey on July 21, 2022.
- Laguna Honda has implemented 344 corrective actions as a result of the first mock survey.
- Each tag has a monitoring plan to ensure sustainability of the corrective actions and achievement of any required targets.
- Every day, leaders hospital wide review the status of the corrective actions – this close monitoring ensures progress and sustainability.
- The second mock survey will take place after the corrective actions from the first mock survey have been sustained.

# CMS Recertification

## Implementing and Sustaining Corrective Actions

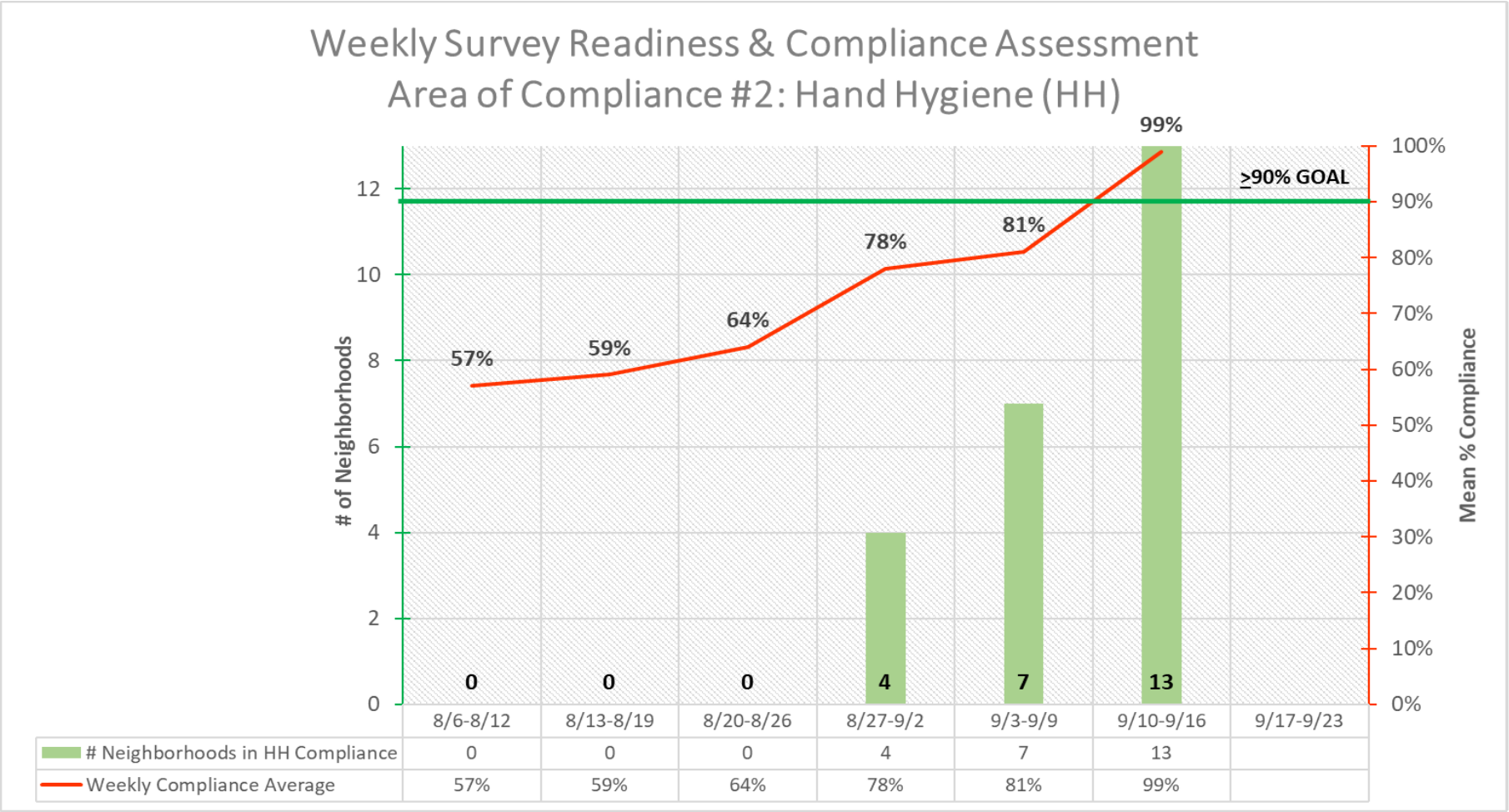
- **The Key Performance Indicators (KPIs) Dashboard:**
- This dashboard combines the recertification-preparedness work into one consistent, visual tracking source for all staff to review. This ensures we meet and sustain regulatory compliance week after week.
- By having staff review the dashboards each week, we can celebrate and sustain successes, as well as direct resources towards areas of noncompliance.
- The KPIs reflect an extensive number of inputs, including in-person observations, document review, and assessments using the same tool deployed by CMS surveyors.

# CMS Recertification



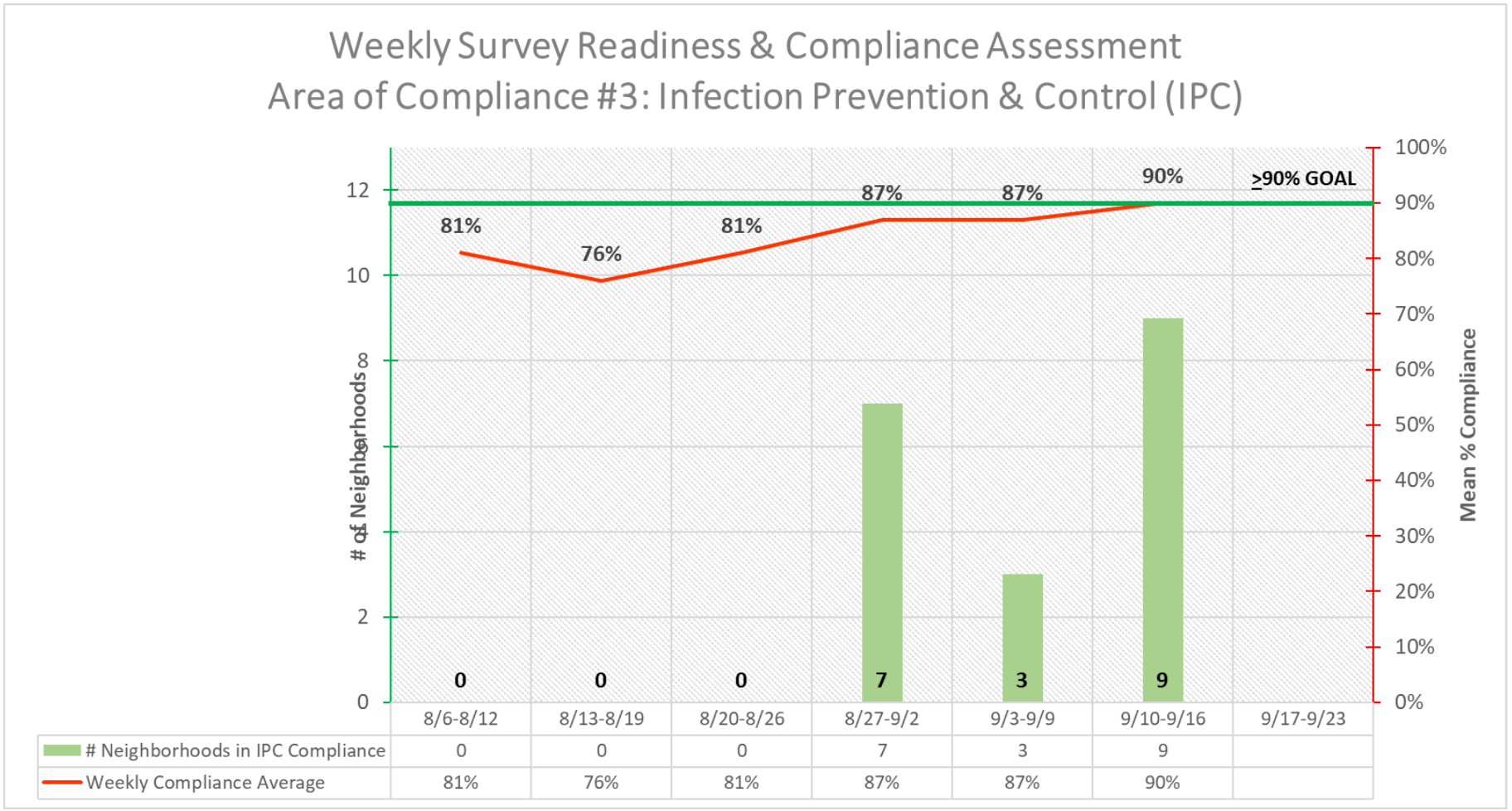

**Key areas for improvement:** 1) Call light response time; 2) Trash, linen, and cleanliness compliance; 3) Medication cart compliance; and 4) Biohazard/sharps containers

# CMS Recertification




**Key areas for improvement:** 1) Proper glove use; and 2) Ensuring soap and water is utilized when necessary

# CMS Recertification




**Key areas for improvement:** 1) PPE properly stocked on units; 2) Donning and doffing PPE appropriately; 3) Clean linen compliance; and 4) Prompt disposal of open food items

# CMS Recertification

## Implementing and Sustaining Corrective Actions

- **24/7 Rounding:** We continue in-person 24/7 observations and just-in-time teaching with an emphasis on infection prevention and control and environment of care.
- **Severe Finding Strike Team:** This team responds to severe findings to ensure findings that could cause resident harm and/or jeopardize recertification are escalated and addressed by a dedicated and multidisciplinary team.
- **Huddle Boards**: Updated huddle board program on every unit with important neighborhood-specific data and space to work collectively on issues using the Plan-Do-Study-Act (PDSA) approach.
- Daily staff engagement with these huddle boards is a key ingredient to their success in driving daily action and improvement.

# CMS RECERTIFICATION

## Bed Reduction Update

- Laguna Honda is required to change policies, procedures and operations to meet current regulations and allow for successful recertification. Current directive from CMS and CDPH is that Laguna Honda must comply with updated CMS 2016 standards related to skilled nursing facility resident occupancy.
- One of those standards is to have no more than two residents per room.
- Laguna Honda now has a maximum of two residents per room. This has reduced our bed count by 120 beds from 769 SNF beds to 649 SNF beds.
- However, we are not de-licensing the third bed in order to keep options open as we go through recertification with CMS.
- We do not yet know if the beds will be certified by CMS but we will maintain our license and we hope to again occupy them.

# Safety

## COVID-19 Outbreak Mitigation

- Laguna Honda responded to the largest COVID-19 outbreak to-date among residents. Resident cases peaked on August 25th at 55 cases. As of September 16th, there are 6 cases.
- Laguna Honda responded swiftly and effectively:
  - A second COVID unit was prepared (although not used)
  - All visitors are now being tested upon entry
  - 24/7 staff observations to ensure proper PPE use and hand hygiene
  - Temporarily closing staff gathering spaces like the cafe and moving most meetings to virtual
  - Staff continue to test twice weekly, wear N95s and eye protection in resident care areas and perform many daily infection prevention and control measures.

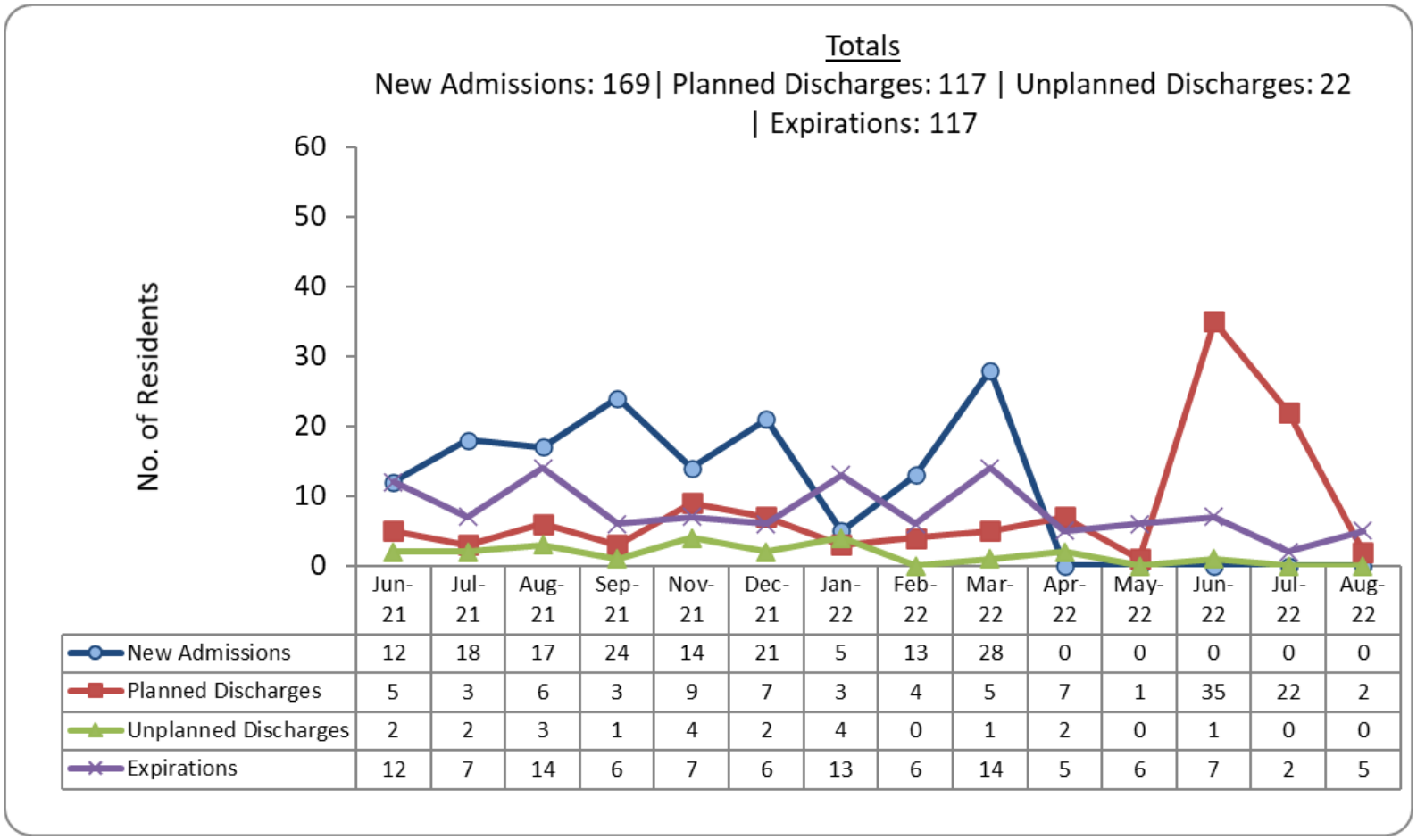
# Safety

## Bivalent COVID-19 Vaccine Rollout

- Laguna Honda began rolling out the bivalent (two-strain) COVID-19 boosters to staff and residents last week.
- Resident Care Teams are obtaining resident consent for both the COVID booster and the flu vaccine. This joint campaign will help ensure a safe fall and winter for our community.
- Resident COVID boosters are being deployed through a roving team.
- Staff COVID boosters are available in the Laguna Honda Clinic.
- 100% of staff and 90% of residents have at least one COVID-19 booster.

# STATE OF THE HOSPITAL

## Admissions*, Discharges, and Expirations




| | Jun-21 | Jul-21 | Aug-21 | Sep-21 | Nov-21 | Dec-21 | Jan-22 | Feb-22 | Mar-22 | Apr-22 | May-22 | Jun-22 | Jul-22 | Aug-22 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| New Admissions | 12 | 18 | 17 | 24 | 14 | 21 | 5 | 13 | 28 | 0 | 0 | 0 | 0 | 0 |
| Planned Discharges | 5 | 3 | 6 | 3 | 9 | 7 | 3 | 4 | 5 | 7 | 1 | 35 | 22 | 2 |
| Unplanned Discharges | 2 | 2 | 3 | 1 | 4 | 2 | 4 | 0 | 1 | 2 | 0 | 1 | 0 | 0 |
| Expirations | 12 | 7 | 14 | 6 | 7 | 6 | 13 | 6 | 14 | 5 | 6 | 7 | 2 | 5 |

**New admissions are currently on hold due the Closure Plan.*

San Francisco Health Network

# Laguna Honda Hospital and Rehabilitation Center

Photo Credit: Heidi Alletzhauser Photography