

QUALITY GUIDELINES

Water Tower Nursing and Home Care, Inc. (WTN) has developed quality guidelines based on a corporate philosophy that our organization provides best of practices. In order to achieve continuous quality improvement, WTN's protocols are constantly scrutinized. WTN associates with other best of practice providers and makes every effort to stay on the cutting edge of current trends and regulations. WTN welcomes our clients, their families and other business and health care partners to alert us to areas where we can improve these guidelines.

CORPORATE VALUES

In accordance with the Illinois Department of Public Health (IDPH) Home Health, Home Services and Home Nursing Agency Licensing Act [210 ILCS 55] and the rules and regulations of the Home Health, Home Services and Home Nursing Agency Code (77 Ill. Adm. Code 245); the Health Care Worker Background Check Act [225 ILCS46] and the Health Care Worker Background Check Code (77 Ill. Adm. Code 955):

- A. WTN is licensed as a Home Services Agency, License #3000708.
- B. WTN accepts Clients for non-medical home care services on the basis of a desire or need, which may include, but is not limited to, assistance with activities of daily living and personal care. No person shall be refused services based on age, race, creed, color, natural origin, marital status, disability or sexual orientation. WTN shall not provide medical services that would be performed by an agency licensed as a home health agency or a home nursing agency.
- C. WTN is responsible for payment of all wages, employment taxes and unemployment insurance including the withholding of applicable social security, federal and state taxes for all employees/home service workers (caregivers).
- D. WTN maintains Commercial Property, Commercial General Liability, Commercial Crime, Commercial Auto, Professional Liability, and Workers Compensation insurance policies; all caregivers are covered under these policies.
- E. WTN enters into a Home Services Agreement with the Client that includes, but is not limited to:
 - 1) Indication and assurance of compliance by WTN with the requirements of the Illinois Licensing Act and the Health Care Worker Background Check Act.
 - 2) Indication and assurance that WTN is responsible for the recruiting, hiring, assigning of duties, monitoring, training, and supervising of all employees. This includes the discipline and firing of all employees.
 - 3) Identification of the charges to be paid, payment schedule, and to whom the client or person acting on behalf of the client is to make payment for services under the contract.
 - 4) Time period for contractual arrangement and a description of the process through which the contract may be terminated, modified or amended.
 - 5) Contact information for the Client to use in case of questions, comments, concerns, or complaints on care to be provided. A description of WTN's complaint resolution process.

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CORPORATE VALUES continued

- F. WTN establishes a Service Plan for each Client in consultation with the Client and his or her appropriate family members or representative that outlines the services to be provided to the Client. WTN will review and revise the plan as necessary, but not less than once annually. The plan shall address and include, but not be limited to:
- 1) The level, type, frequency and scope of services the Client is receiving.
 - 2) Identification of any functional limitations of the Client and the relevance of the limitation to the services to be provided.
 - 3) Information received from the Client and his or her appropriate family members or representative, which shall be communicated to the caregiver, on circumstances that may have an impact on the Client's activity or involvement, such as basic information on medications being taken, treatments received, Client's physician, activity, diet and mental status.
- G. WTN maintains a Client Record for each Client receiving in-home services. The record contains:
- 1) Appropriate identifying information for the Client, including the Client name, address, and telephone numbers.
 - 2) The name, address, and telephone numbers of the Client's representative, if applicable.
 - 3) The name, address, and telephone numbers of an individual or relative to be contacted in an emergency.
 - 4) The Service Plan agreed to by the Client and WTN.
 - 5) A copy of the fully executed Home Services Agreement between the Client and WTN.
 - 6) Documentation of the services provided at each visit.
- H. WTN maintains a Caregiver Record for each caregiver providing services which contains:
- 1) Appropriate identifying information for the caregiver including; name, address, telephone numbers, social security number, date of birth, and name and address of next of kin.
 - 2) Evidence of qualifications, including any current licensure, registration or certification, and training as required by state or federal law.
 - 3) Dates of employment, starting and ending dates on placement of cases, of separation from WTN and the reason for separation.
 - 4) Documentation on the monitoring and supervision of the caregiver including any applicable disciplinary actions.
- I. WTN's total Quality Improvement Program, which includes written polices, shall be evaluated at least once a year. This evaluation accesses the extent to which WTN's program is appropriate, adequate, effective and efficient.

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HIRING

All information and documentation obtained in this section is maintained in the employee personnel file upon hire, unless otherwise noted.

- A. Application Process – a formal process, including written application, telephone discussions, and staff discussions must occur for each applicant.
- B. Interview Process – a minimum of two (2) in-person interviews are required for each applicant.
- C. A minimum of two (2) work related references, either written or verbal, are required verifying prior direct client care.
- D. WTN conducts a fingerprint-based criminal history records check through the Illinois Department of Public Health (IDPH) web application used for the Health Care Worker Registry. WTN initiates a fingerprint-based criminal history records check through an approved Livescan vendor for any prospective caregiver that has not had such a background check or is not active on the Health Care Worker Registry. WTN ensures all prospective caregivers are fingerprinted prior to employment.
- E. WTN conducts internet searches on certain websites through the IDPH web application used for the Health Care Worker Registry, including without limitation, the Illinois Sex Offender Registry, the Department of Corrections' Sex Offender Search Engine, the Department of Corrections' Inmate Search Engine, the Department of Corrections' Wanted Fugitives Search Engine, the National Sex Offender Public Registry, and the website of Health and Human Services Office of Inspector General to determine if the applicant has been adjudicated a sex offender, has been a prison inmate, or has committed Medicare or Medicaid fraud , or conduct similar.
- F. WTN conducts a check through IDPH web application used for the Health Care Worker Registry for any administrative findings of abuse, neglect or misappropriation of property.
- G. WTN conducts a thorough background screening in accordance with the Fair Credit Reporting Act. This includes an initial Motor Vehicle Record Check (MVR), social security number confirmation, and a current and historical felony conviction records check. Thereafter, MVR checks are completed as needed.
- H. WTN ensures that all prospective caregivers:
 - 1) Do not have a disqualifying background check under the requirements of the Health Care Worker Background Check Act without a waiver.
 - 2) Have a copy of their Social Security Card.
 - 3) Have a visa or proof of citizenship in compliance with the Department of Justice, Immigration and Naturalization Service requirements for employment.
- I. When applicable, WTN acquires documentation and verification of current certification, registration or license information.
- J. WTN employees are screened for communicable diseases. A physician's statement stating that the employee is free from communicable disease is required if a problem is suspected.
- K. In accordance with CDC federal guidelines, a Hepatitis B Vaccine Policy is in place.
- L. WTN employees are provided with a comprehensive job description outlining duties and limitations.

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TRAINING

WTN will provide a minimum of eight (8) hours of initial training for each caregiver. Four (4) hours of training will be provided prior to the caregiver's first assignment and the remaining four (4) hours will be provided within the caregiver's first thirty (30) days after employment. All training is documented and maintained in the caregiver's file and/or training log for tracking purposes.

Initial caregiver training includes the following topics:

1. An extensive orientation to WTN's philosophy and standards of care. This includes a review of WTN's employee policies and procedures (Roles and Responsibilities) manual. A signed acknowledgement form is obtained.
2. A review of the caregiver's job responsibilities and limitations.
3. Communication skills in areas such as with people who are hard of hearing, have dementia or other special needs.
4. Instruction for observation, reporting and completion of documentation of services provided, including changes in functional ability and mental status demonstrated by the client. Emphasis placed on objective vs. subjective reporting.
5. How to assist with activities of daily living and personal care tasks, including: ambulation, bathing, dressing, exercise, feeding, hair care, medication reminding, mouth care, nail care, positioning, shaving, skin care, toileting, and transfers.
6. How to assist a client in the use of specific adaptive equipment, such as a mechanical lifting device, if the caregiver will be working with clients who use this device.
7. Standard Precautions/Infection Control. WTN employees are trained in accordance with the Centers for Disease Control (CDC) and the Occupational Safety and Health Administration (OSHA) regulations. Employees are required to use the necessary protective equipment and supplies in order to comply with those regulations. Initial focus is on hand washing, basic hygiene and basic infection control practices.
8. Confidentiality and security of clients' personal, financial, and health information in accordance with applicable Health Insurance Portability and Accountability Act (HIPAA) regulations.
9. Behaviors that would constitute abuse or neglect and the legal prohibitions against these behaviors, as well as knowledge and understanding of abuse and neglect prevention and reporting requirements.
10. Explanation of the Client's individualized Service Plan.
11. Basic body mechanics for employee safety. Specific "how to" instructions are given for transferring a client using proper techniques.
12. WTN's procedures for the safety of the employee and client, along with guidelines for handling emergency situations including disaster/emergency preparedness. WTN's procedures for emergency situations include but are not limited to fire, home security, personal, weather related, power outage, etc. Caregivers are trained in basic first aid and to be aware of all known hazards or potential hazards.

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TRAINING continued

13. Promoting client dignity, independence, self-determination, privacy, choice and rights.
14. Maintaining a clean, healthy and safe environment.
15. Basics of hydration and information on the signs and symptoms of dehydration.
16. Overview of basic human needs specific to aging and disease processes.
17. Basics of nutrition requirements and the guidelines for meal preparation, including training or explanation of dietary requirements for client's illness or condition.

Note: In addition to the above initial training requirements, each WTN caregiver must complete a minimum of eight (8) hours of training annually, during each year of employment, to maintain placement availability. This may include hands on demonstrations, self-study packets, corporate training programs, DVD's, workshops on pertinent senior care topics as well as individual training for the unique needs of the client receiving care.

SUPERVISION

WTN supervisors have experience and training in the home care services industry. A WTN supervisor:

- A. Will oversee the provision of day-to-day services and the placement of caregivers.
- B. Is available for questions, comments, concerns or complaints 24 hours a day, 7 days a week by calling 312.280.4980; WTN's email address is: info@WaterTowerNursing.com.
- C. Will attempt to successfully resolve all complaints in a fair and timely fashion and without interruption in service.
- D. Will conduct on-site supervisory visits at a minimum of every ninety (90) days or more often if the Service Plan requires it.
- E. Will oversee an annual caregiver performance evaluation.
- F. Will perform a quarterly review of both active and closed client records to assure that established policies are followed in providing services. This review shall include, but not be limited to whether the service plan was followed by the caregiver.
- G. Will comply with the Abuse, Neglect and Financial Exploitation Prevention and Reporting as outlined in Title 77, Section 245.250.

Note: Supervision does not constitute time or an activity that can be billed as a service to the Client.

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WTN'S TEAM OF SUPERVISORS

WTN's supervisory team draws on the skills from a wide array of health system experiences.

General Office Information

<u>Office Location and Mailing Address:</u>	Water Tower Nursing and Home Care, Inc. 845 N. Michigan Avenue, Suite 902W Chicago, IL 60611
<u>Office Hours:</u>	8:30 a.m. to 6:00 p.m. Monday through Friday 8:30 a.m. to 3:00 p.m. Saturday
<u>24/7 Telephone Contact:</u>	(312) 280-4980
<u>Email:</u>	info@WaterTowerNursing.com

WTN Supervisors

All Aspects of Business Both Administrative and Care Related

Director/Agency Manager:

Mark Paley, RPh.

Administrative, Caregiver, Billing and Insurance Issues

Director of Operations:

Kathy Kwiatkowski

Client Assessment and Caregiver Supervision and Monitoring

Client Care Supervisor:

Michelle Rakoncay, RN

Billing and Insurance Issues

Bookkeeper:

Jamie Kirsch