This survey report and the information contained herein, resulted from the State Veterans Home (SVH) Survey as a Summary Statement of Deficiencies. (Each Deficiency Must be Preceded by Full Regulatory or applicable Life Safety Code Identifying Information.) Title 38 Code of Federal Regulations Part 51 is applied for SVHs applicable by level of care.

## **General Information:**

Facility Name: Grand Rapids Home for Veterans

Location: 3000 Monroe, N.W. Grand Rapids, MI 49505

Onsite / Virtual: Virtual

Dates of Survey: 12/19/22-12/22/22

NH / DOM / ADHC: NH

Survey Class: Annual

Total Available Beds: 146

## Census on First Day of Survey: 119

<u>Surveyed By:</u> Danielle Pearce, MSH, NHA; Julie Fisher, RN; Natasha Cheatham, Generalist; Kathleen Clawson, RN; Nathan Johns (LSC); Cicely Robinson VACO

VA Regulation Deficiency	Findings
	Initial Comments:
	A VA Annual Survey was conducted from December 19, 2022 through December 22, 2022 at the Grand Rapids Home for Veterans. The survey revealed the facility was not in compliance with Title 38 CFR Part 51 Federal Requirements for State Veterans Homes.
§ 51.43 (a) (1)-(2) Drugs and	The facility was unable to demonstrate that the VA only
medicines for certain veterans.	furnishes drugs and medicines to a State home for veterans who are eligible to receive such medications.
(a) In addition to the per diem payments under $\S 51.40$ of this part, the Secretary will furnish drugs and medicines to a State home as may be ordered by prescription of a duly licensed physician as specific therapy in the treatment of illness or injury for a veteran receiving nursing home care in a State home if -	During an interview on 12/20/22 that included the facility Administrator, Pharmacy Manager, and State Administrative Manager, it was identified that all drug and medication costs for veterans in the facility with a singular or combined service- connected (SC) rating of 10-40 percent based on one or more SC disabilities are absorbed by the VA Medical Center (VAMC) of jurisdiction rather than only the cost of drugs and medications needed for the SC disability.
<ul><li>(1) The veteran:</li><li>(i) Has a singular or combined rating of less than 50 percent based on one or more service-</li></ul>	Through a record review of veterans for whom the VAMC of jurisdiction absorbed the drug and medication costs for January 2022 and April 2022, it was identified that eight (8) of 46 Veterans in January 2022 and eight (8) of 43 Veterans in April

<ul> <li>connected disabilities and needs the drugs and medicines for a service-connected disability; and</li> <li>(ii) Needs nursing home care for reasons that do not include care for a VA adjudicated service-connected disability; or</li> <li>(2) The veteran: <ul> <li>(i) Has a singular or combined rating of 50 or 60 percent based on one or more service-connected disabilities and needs the drugs and medicines; and</li> <li>(ii) Needs nursing home care for reasons that do not include care for a VA adjudicated service-connected disabilities and needs the drugs</li> <li>Rating: Not Met</li> </ul> </li> <li>Scope and Severity - B</li> <li>Residents Affected - Some</li> </ul>	2022 had a 10-40 percent SC rating. The facility failed to provide evidence to support that only the cost of drugs and medications needed for a SC disability were absorbed by the VAMC of jurisdiction.
<ul> <li>§ 51.43(d) Drugs and medicines for certain veterans.</li> <li>VA may furnish a drug or medicine under this section and under §17.96 of this chapter by having the drug or medicine delivered to the State home in which the veteran resides by mail or other means and packaged in a form that is mutually acceptable to the State home and to VA set forth in a written agreement.</li> <li>Rating: Not Met</li> <li>Scope and Severity - C</li> <li>Residents Affected - Many</li> </ul>	The facility was unable to demonstrate that the VA only furnishes drugs or medicines as set forth in a written agreement. During an interview on 12/20/22 that included the facility Administrator, Pharmacy Manager, and State Administrative Manager, it was identified that the facility orders the majority of needed drugs and medications for all residents through the VA's Pharmaceutical Prime Vendor (PPV) Contract. Subsequent document review revealed that the facility had previously entered into a written agreement to allow the facility to order drugs and medications through the VA's PPV, however this written agreement started in 2005 and expired after an initial base year and four (4) option years. During an interview on 12/21/22 with the facility Administrator and State Chief Operating Officer, it was identified that the facility had last been in communication with the VA Medical Center (VAMC) of jurisdiction regarding the status of a new written agreement in 2018. The VAMC of jurisdiction expressed that they would continue to honor the previous written

	agreement, but no new written agreement has been executed and no current written agreement is in place.
§ 51.43 (e) Drugs and medicines for certain veterans.	The facility was unable to demonstrate submission to the VA Medical Center (VAMC) of jurisdiction of a completed VA Form
As a condition for receiving drugs or medicine under this section or under §17.96 of this chapter, the State must submit to the VA medical center of jurisdiction a completed VA Form 10-0460 with the corresponding prescription(s) for each eligible veteran. Rating: Not Met Scope and Severity - B	10-0460 for each eligible veteran. During an interview on 12/20/22 that included the facility Administrator, Pharmacy Manager, and State Administrative Manager, it was identified that the facility orders drugs and medications through the VA's Pharmaceutical Prime Vendor (PPV) Contract. The VAMC of jurisdiction pays the PPV for the total cost of all drugs and medications, absorbs the cost of medications for veterans in the facility who are assessed as eligible for VA-furnished drugs and medications, and then subsequently issues a bill of collection to the facility for the cost of drugs and medications for veterans in the facility who are not
Residents Affected - Some	assessed as eligible for VA-furnished drugs and medications.
	Through a record review, it was identified that the VAMC of jurisdiction absorbed the drug and medication costs for 46 veterans in January 2022 and for 43 Veterans in April 2022. The facility confirmed that no completed VA Form 10-0460 to confirm eligibility was submitted to the VAMC of jurisdiction.