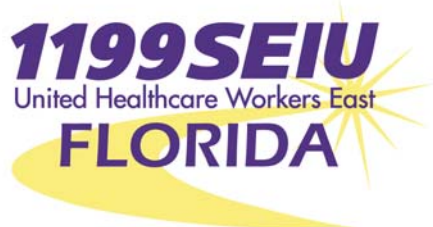
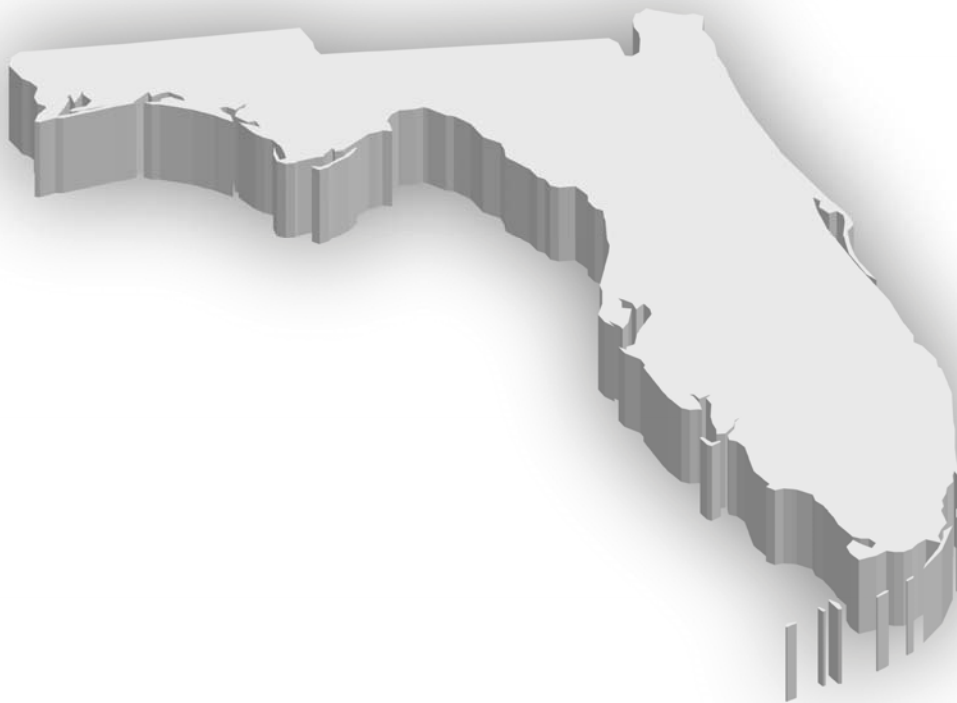


An Analysis of the Quality of Care in Consulate Health Care Facilities in Florida



EXECUTIVE SUMMARY

In the last three years, the Florida legislature has rolled back many of the protections guarding quality care in Florida nursing homes that were in place for a decade by restricting nursing home ombudsman authority and decreasing staffing levels. To date, the effects these roll-backs have made on quality of care have not been analyzed. To shed light on the current state of care in Florida's nursing homes, 1199SEIU United Healthcare Workers researched staffing levels and the quality indicators in the state's largest for-profit chain, Consulate Health Care, which operates 76 nursing homes and four assisted living communities across Florida.

Key Findings

A Shaky Track Recordⁱ

- Consulate's federal fines exceeded \$1.5 million while state fines rang in at a whopping \$397,250
- Two-thirds of Consulate's nursing homes have been sanctioned by federal or state inspectors
- 1 in 3 Consulate nursing homes were cited with a severe deficiency.
- Thirty-six percent of Consulate nursing homes are on Florida's watch list *"for not meeting state standards, or for not making corrections quickly enough."*ⁱⁱ The high number of watch list facilities is nearly twice the statewide average.
- At \$679,900, Consulate's Deltona Healthcare received Florida's largest single federal fine in recent history.

Staffing Levels

- 15.8% of Consulate facilities were below the state mandated 2.5 Certified Nursing Assistant (CNA) hours per resident per day standard.
- An additional 62% of Consulate facilities were below the Florida average of 2.79 CNA hours per resident per day.

Pressure Ulcers

- 63% of reporting Consulate's Florida facilities have a higher percentage of high risk long-stay residents with pressure ulcers than the Florida average.
- 43% of reporting Consulate's Florida facilities have a higher percentage of high risk short-stay residents with pressure ulcers than the Florida average.

Depression

- 37% of reporting Consulate Florida facilities have a higher percentage of long-stay residents who have depressive symptoms than the Florida average.

Falls with Major Injury

- 43% of reporting Consulate Florida facilities have a higher percentage of long-stay residents experiencing one or more falls with major injury than the Florida average.

Antipsychotic Medication Usage

- Only one reporting Consulate Florida facility is below the Florida average for percentage of long-stay residents who received an antipsychotic medication.
- 36.8% of reporting Florida Consulate facilities have a higher percentage of short-stay residents who received an antipsychotic medication than the Florida average.

Physical Restraints

- 46% of reporting Consulate Florida facilities have a higher percentage of long-stay residents who were physically restrained than the Florida average.

Conclusion

Consulate Health Care is a fast-growing, large nursing home chain with 151.7% increase in revenues since 2010ⁱⁱⁱ. However, the data shows Consulate failed to comply with the state's minimum staffing standards in 16% of its facilities for the first quarter of 2013. The use of antipsychotic medications at Consulate nursing homes was above average in all but one of the homes for the first quarter of 2013. These are serious issues that have an impact on the quality of life for nursing home residents that need immediate intervention.

Recommended Course of Action

- Increase quality care standards and stronger oversight of the nursing home industry.
- Strengthen ombudsman program's authority and independence.

Introduction

Consulate Health Care (Consulate) is a national provider of senior healthcare services, specializing in post-acute care and offering services such as short-term transitional care, Alzheimer's, and dementia care. Consulate's national headquarters is in Maitland, Florida. The *Orlando Business Journal* named Consulate one of the fastest growing private firms in the Orlando area for 2013^{iv}. Consulate was also the top ranking business on the *Orlando Business Journal's* Golden 100 due to its \$1.7 billion in revenue – an increase of 151.7% from 2012^v. In 2011, Consulate's Florida facilities posted profits of \$6.1 million.^{vi} This is a 15% profit margin – more than double the average profit margin of 6.79% for private nursing homes in 2011.^{vii}

After a major expansion in 2012, Consulate now operates facilities located in 21 states.^{viii} In Florida, Consulate operates 76 nursing homes and four assisted living communities. The list of facilities is found in Appendix A.

Because Consulate Health Care is headquartered in Florida and operates seventy-six facilities, 1199SEIU United Healthcare Workers analyzed the company's it is important to evaluate the quality of care provided in its facilities in order to shed light on the current state of care in Florida's nursing homes.

Methodology

Using publicly available information from The Centers for Medicare and Medicaid Services, we evaluated Consulate Health Care's staffing levels and performance on national quality indicators for first quarter 2013.

Staffing Analysis

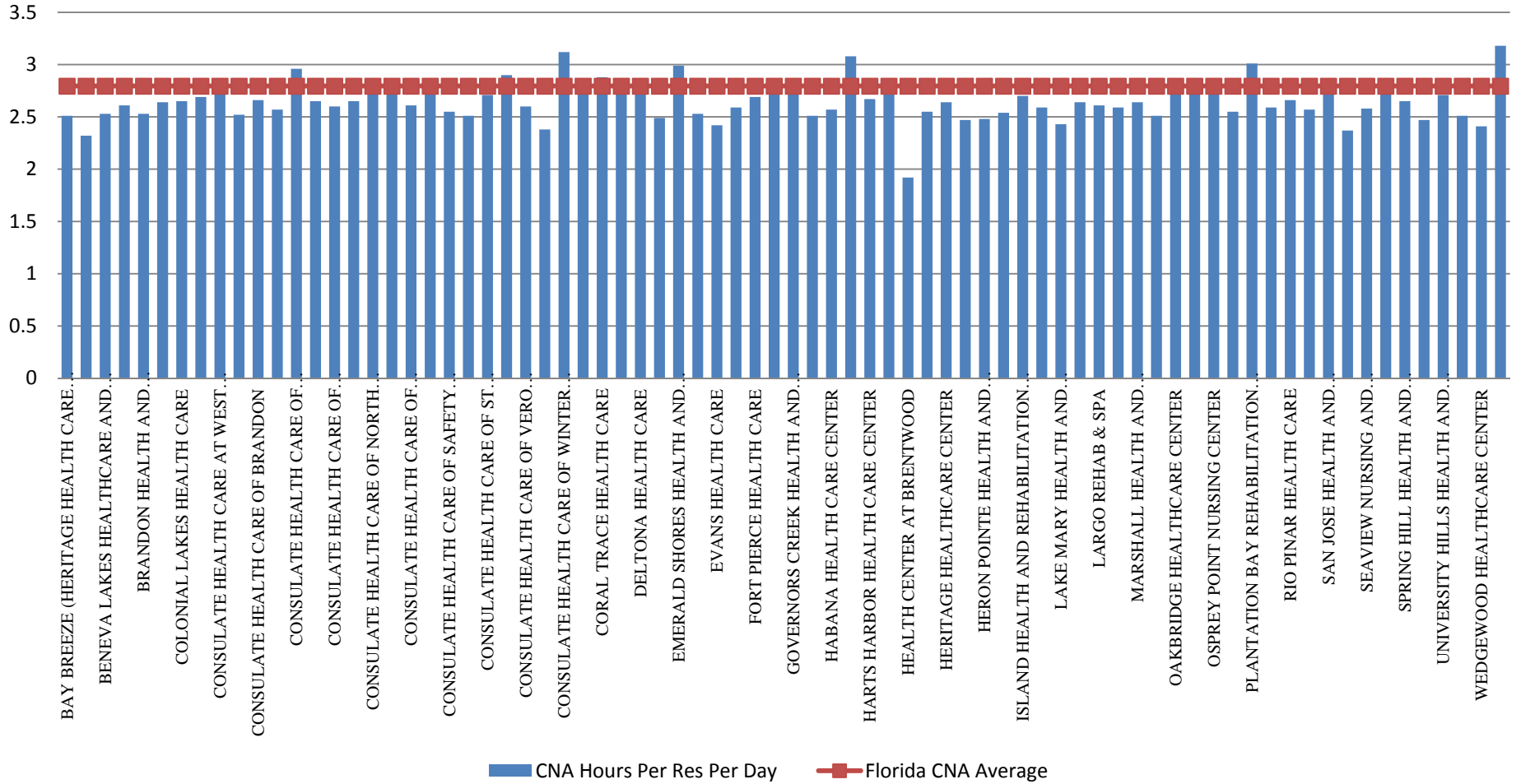
Residents are admitted to nursing homes because they need a higher standard of care than they can provide for themselves. This care is provided by registered nurses, licensed practical nurses, certified nursing assistants, dietary assistants, cooks and housekeeping staff. Studies have supported the significant role staffing levels play in the provision of quality care. A study by Castle and Anderson published in *Medical Care* in June 2011^{ix} found that “*Staffing levels for nurse aides, who provide the most direct care to residents, also significantly influenced quality.*”^x Another study by Harrington, Olney, Carrillo and Kang published in *Health Services Research* in 2012^{xi} found that the top 10 for-profit nursing home chains had lower total nursing hours than government facilities and 36% higher deficiencies and 41% higher serious deficiencies than government facilities.^{xii}

In 2011, the Florida legislature passed a budget that reduced funding to nursing homes and passed a bill that reduced staffing levels from a minimum weekly average of 2.9 hours of certified nursing assistant (CNA) care per resident per day to 2.5 hours. We evaluated the CNA hours per resident per day for Consulate's Florida facilities for the first quarter of 2013.

- 15.8% of Consulate facilities were below the state mandated 2.5 CNA hours per resident per day standard.
- An additional 62% of Consulate facilities were below the Florida average of 2.79 CNA hours per resident per day.

A listing of staffing levels by facility is available in Appendix B. The methodology is found in Appendix C.

2013-1Q Consulate Facility CNA Staffing Ratios vs. Florida Average



To put this indicator into perspective, the chart below highlights the activities of daily living. Many residents live in nursing homes because they cannot accomplish these tasks without help. In an interview conducted on September 18, 2013, a group of CNAs working in Consulate facilities estimated the amount of time it takes them to help one resident accomplish each task. We asked them for a range to accommodate the different needs of different residents^{xiii}.

Activity of Daily Living	Estimated Time to help a resident complete the activity
<p>Eating</p> <p>For residents who can feed themselves, this task includes setting up and collecting the tray, and checking on the resident to make sure he/she is eating or walking the resident to the dining hall.</p> <p>For residents who cannot feed themselves, this includes setting up and collecting the tray and feeding the resident.</p>	<p>15 minutes – 30 minutes x three times a day</p> <p>45 minutes – 60 minutes x three times a day</p>
<p>Toileting – Getting to /from the toilet, on and off the toilet and associated personal hygiene</p> <p>For residents who need help walking to and from the bathroom, the CNA must assist them and then stay and wait in case the resident needs help.</p> <p>For residents who suffer incontinence, the CNA must clean and change the briefs on the resident. If a resident is on blood pressure medications or diuretics, this could be every hour during the day.</p>	<p>15 – 30 minutes at least three times a day</p> <p>15 – 30 minutes at least three times a day</p>
<p>Bathing/Showering</p> <p>An average shower or bed bath</p> <p>For residents that need a lift to move them from the bed to a shower, this can take up to 90 minutes and two CNAs</p>	<p>30 – 45 minutes</p> <p>90 minutes</p>
<p>TOTAL</p>	<p>2 hours per resident per day to at least six hours per resident per day</p>

Please note these estimates do not include dental care, emotional support or helping residents move around their room or the facility.

Quality Measures Analysis

The Centers for Medicare and Medicaid Services (CMS) collects and publishes quality measures on nursing homes across the United States. This information is available to the public for research and published on a website called Nursing Home Compare.^{xiv} The data points used for each facility are the average of the three most recent data points as calculated by CMS and published on their Nursing Home Compare website. For all of the quality measures in our analysis, a lower percentage is indicative of better quality care.

The data is divided by long-stay and short-stay residents. Long-stay residents are residents who stay longer than 101 days. Short-stay residents are residents who stay less than 100 days.

Pressure Ulcers

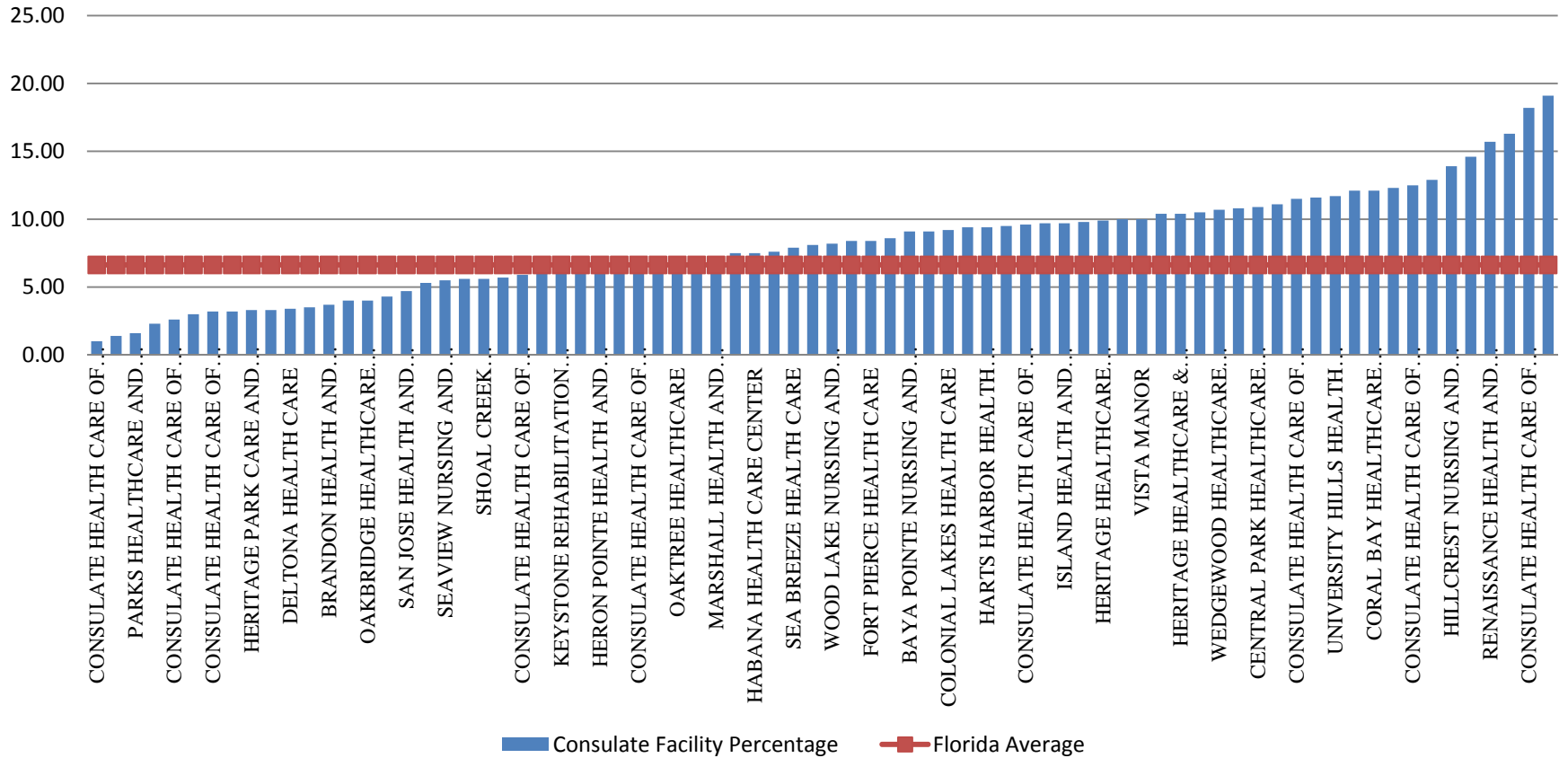
Pressure ulcers are painful sores that take a long time to heal and may lead to other complications including skin and bone infections. Interventions to help prevent or treat pressure sores include repositioning the resident frequently, proper nutrition, and using special padding or skin coverings to reduce the pressure on the skin.

63% of reporting Consulate's Florida facilities have a higher percentage of high risk long-stay residents with pressure ulcers than the Florida average. Osprey Point Nursing Center had the highest percentage - 19.1% (2.88 times the Florida average).

43% of reporting Consulate's Florida facilities have a higher percentage of high risk short-stay residents with pressure ulcers than the Florida average. Vista Manor had the highest percentage - 4.1% (almost 3.5 times the Florida average).

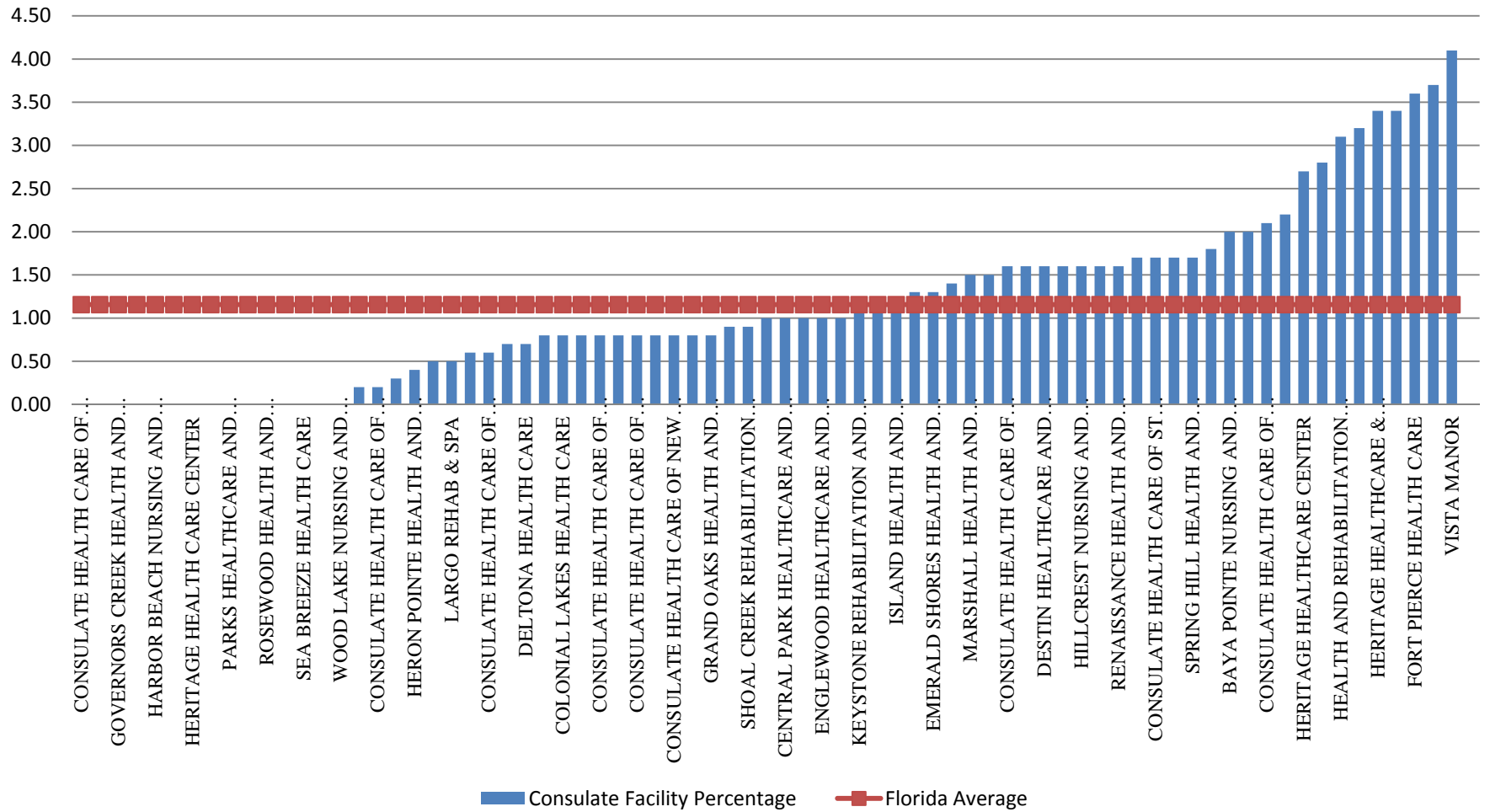
2013-1Q Consulate Facilities vs Florida Average

Percent of long-stay high-risk residents with pressure ulcers.



2013-1Q Consulate Facilities vs Florida Average

Percent of short-stay residents with pressure ulcers that are new or worsened.



Depressive Symptoms

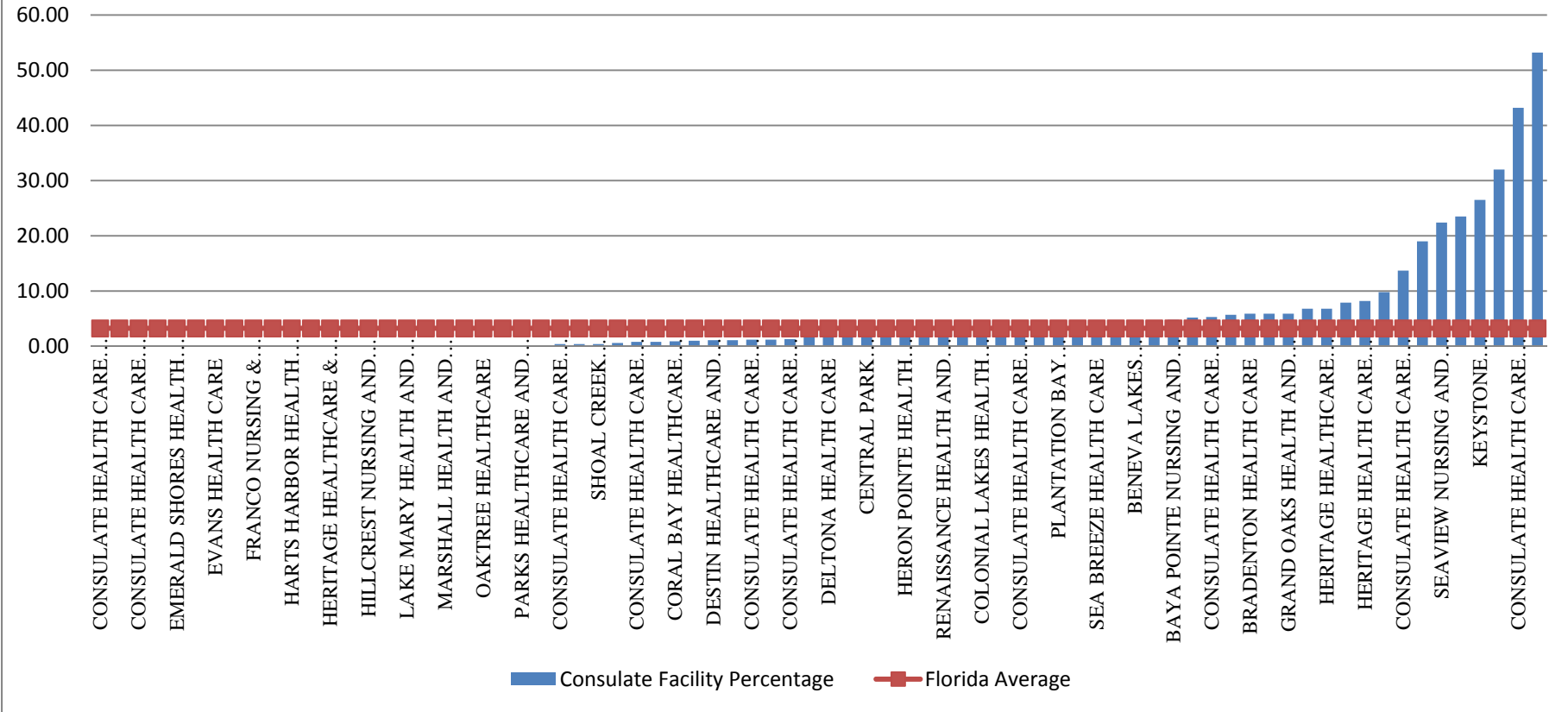
Nursing home residents are at high risk for developing depression and anxiety. Depressed residents may lose interest in normal activities, have trouble sleeping and suffer from fatigue or lack of appetite. It is important to identify and treat depression properly. Proper treatment includes therapy, increase in emotional or social support and medication.

37% of reporting Consulate Florida facilities have a higher percentage of long-stay residents who have depressive symptoms than the Florida average.

Consulate Health Care at West Altamonte had the highest percentage - 53.2% (16 times the Florida average).

2013-1Q Consulate Facilities vs Florida Average

Percent of long-stay residents who have depressive symptoms.



Antipsychotic Medications

Antipsychotic drugs are generally used to treat mental health conditions. Since 2005, the Food and Drug Administration has warned that prescribing antipsychotic medications for elderly patients with dementia carries an increased risk of death.^{xv}

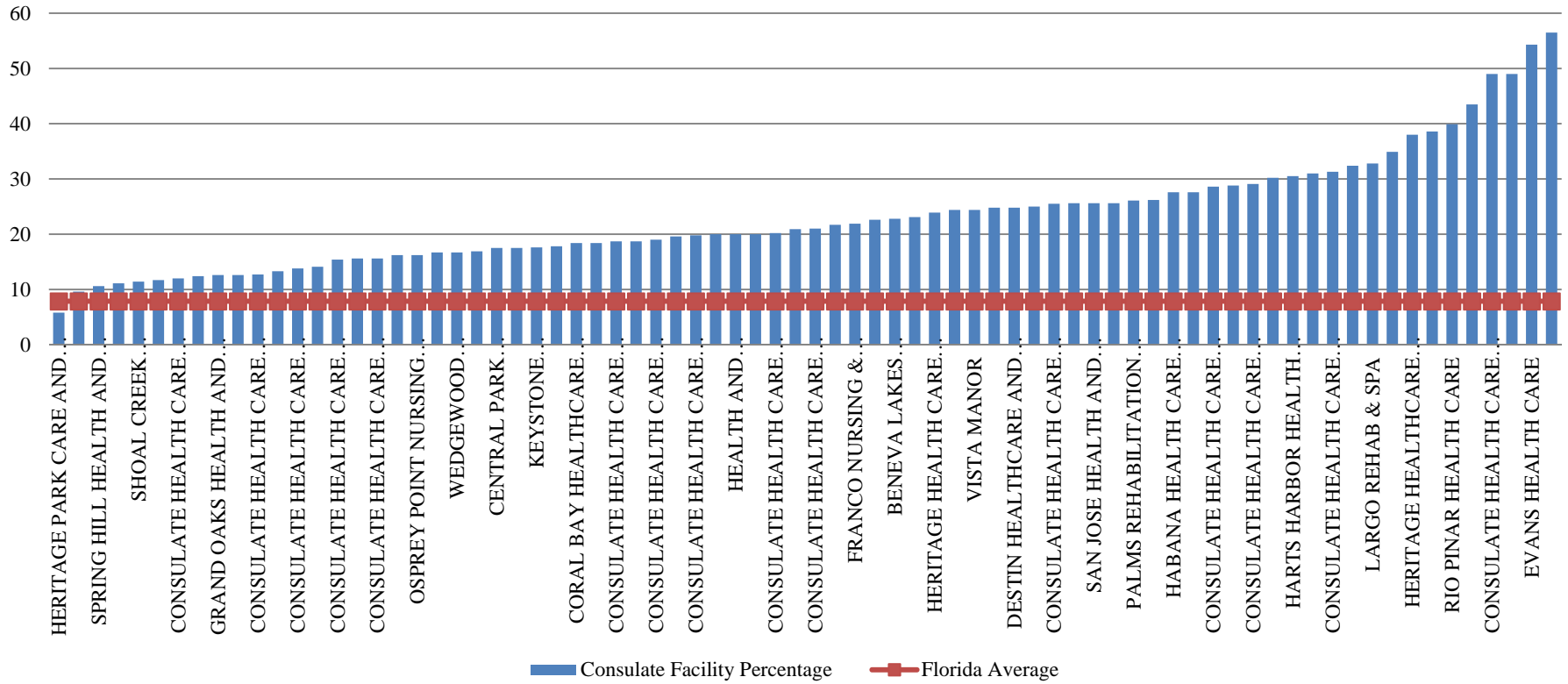
The Centers for Medicare and Medicaid Services recommends that consumers investigate how nursing homes manage the behavior of dementia residents. Alternatives to the use of antipsychotic medications include higher staffing ratios, increased activities and consistent staff assignments.^{xvi}

Only one reporting Consulate Florida facility is below the Florida average for percentage of long-stay residents who received an antipsychotic medication. Seaview Nursing and Rehabilitation Center had the highest percentage - 56.5% (7.2 times the Florida average).

36.8% of reporting Florida Consulate facilities have a higher percentage of short-stay residents who received an antipsychotic medication than the Florida average. Countryside Rehabilitation and Healthcare Center had the highest percentage - 9.8% (three times the Florida average).

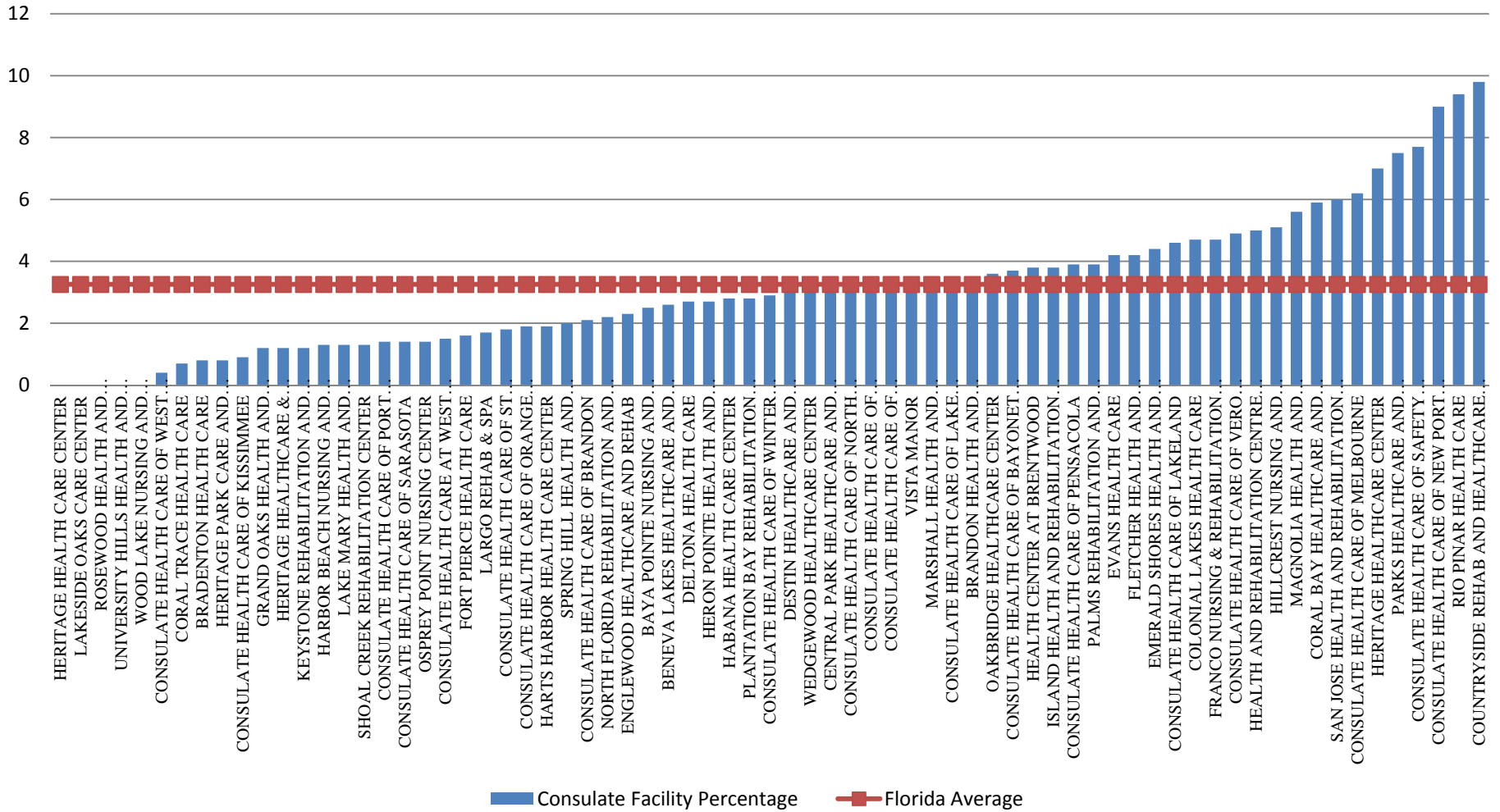
2013-1Q Consulate Facilities vs Florida Average

Percent of long-stay residents who received an antipsychotic medication.



2013-1Q Consulate Facilities vs Florida Average

Percent of short-stay residents who newly received an antipsychotic medication.



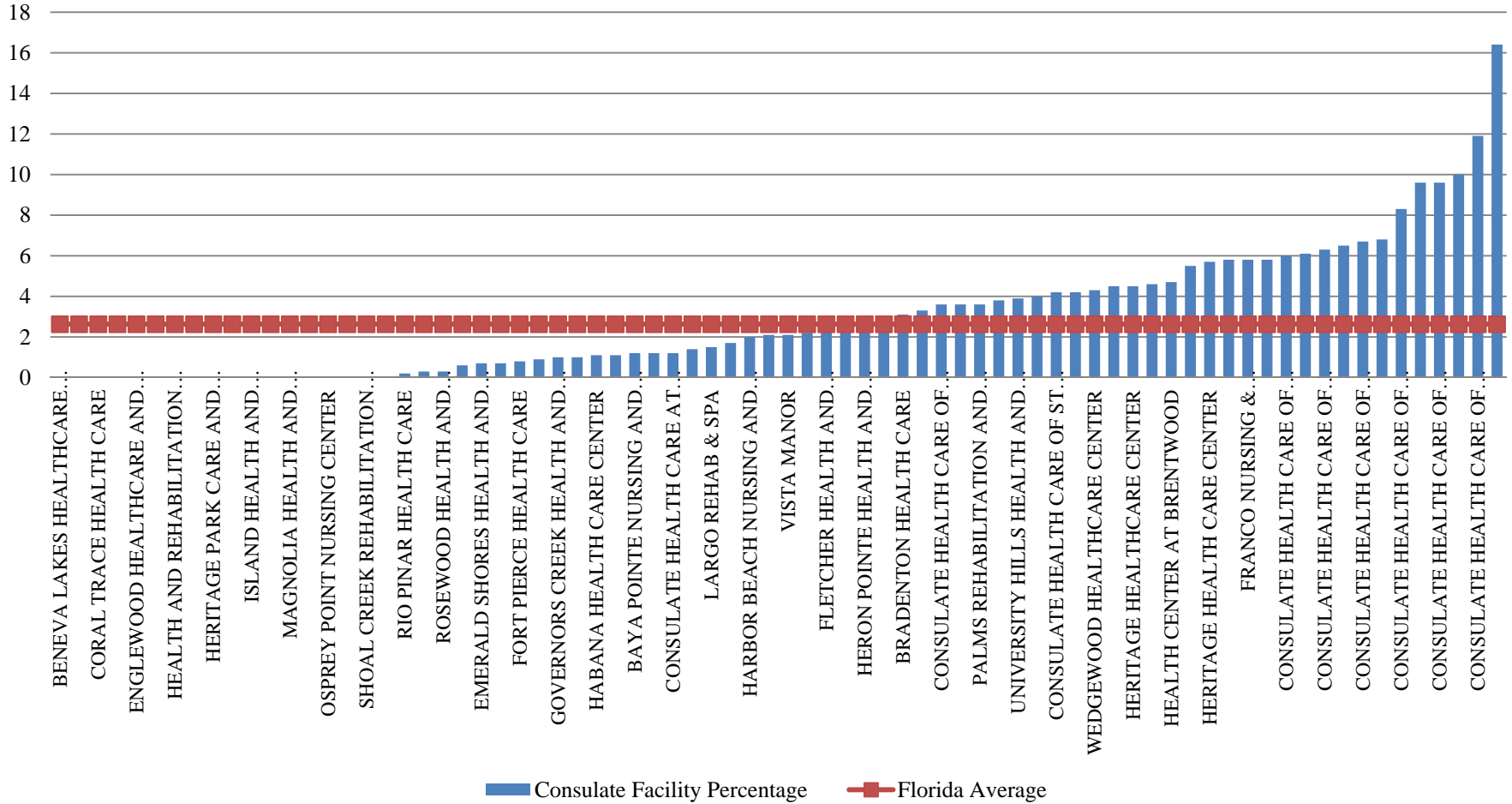
Physical Restraints

Physical restraints must be prescribed by a physician. They should only be used as necessary as part of treatment based on a demonstrated medical need. If a resident is restrained daily, he or she may develop pressure ulcers or become incontinent.

46% of reporting Consulate Florida facilities have a higher percentage of long-stay residents who were physically restrained than the Florida average. Consulate Health Care of Tallahassee had the highest percentage - 16.4% (6.2 times the Florida average).

2013-1Q Consulate Facilities vs Florida Average

Percent of long-stay residents who were physically restrained.



Residents Who Reported Moderate to Severe Pain

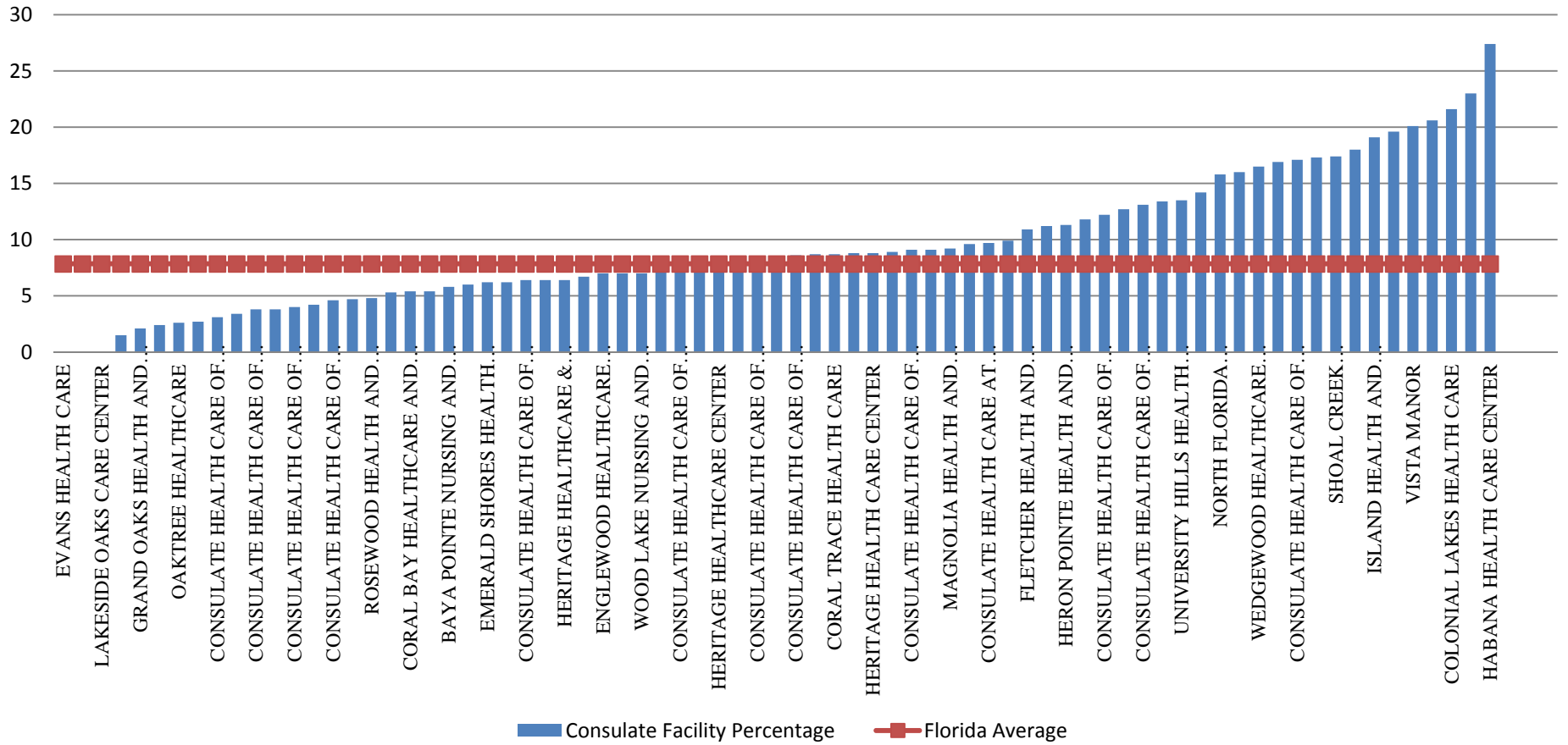
Residents' pain levels should be monitored regularly. If residents report pain, the staff should make an effort to make the resident more comfortable. Some residents may refuse pain medications in order to remain alert.

52% of reporting Consulate Florida facilities have a higher percentage of long-stay residents who self-report moderate to severe pain than the Florida average. Habana Health Care Center had the highest percentage - 27.4% (almost 3.5 times the Florida average).

54% of reporting Consulate Florida facilities have a higher percentage of long-stay residents who self-report moderate to severe pain than the Florida average. Osprey Point Nursing Center had the highest percentage - 40.5% (twice the Florida average).

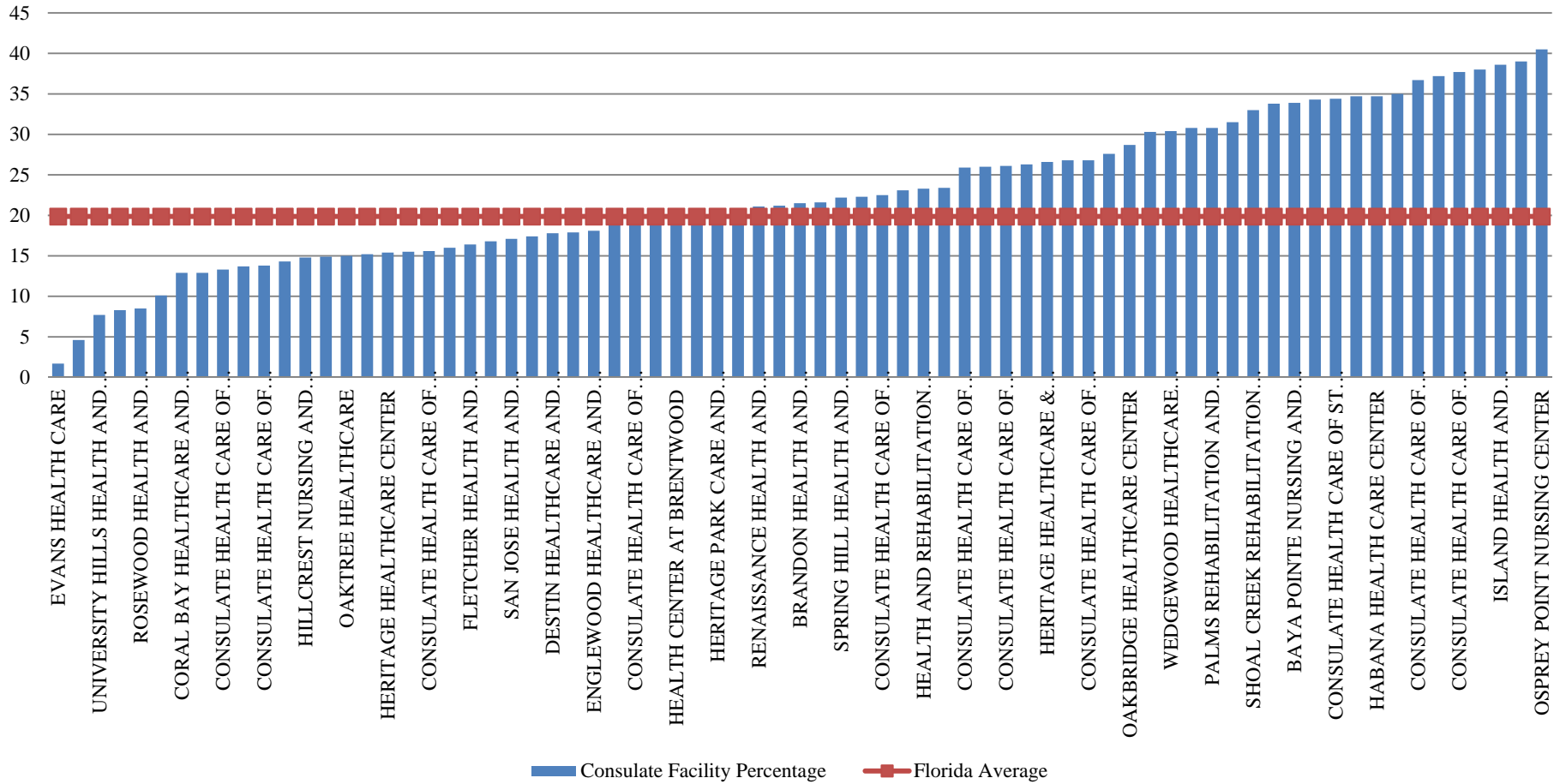
2013-1Q Consulate Facilities vs Florida Average

Percent of long-stay residents who self-report moderate to severe pain.



2013-1Q Consulate Facilities vs Florida Average

Percent of short-stay residents who self-report moderate to severe pain.



Falls with Major Injury

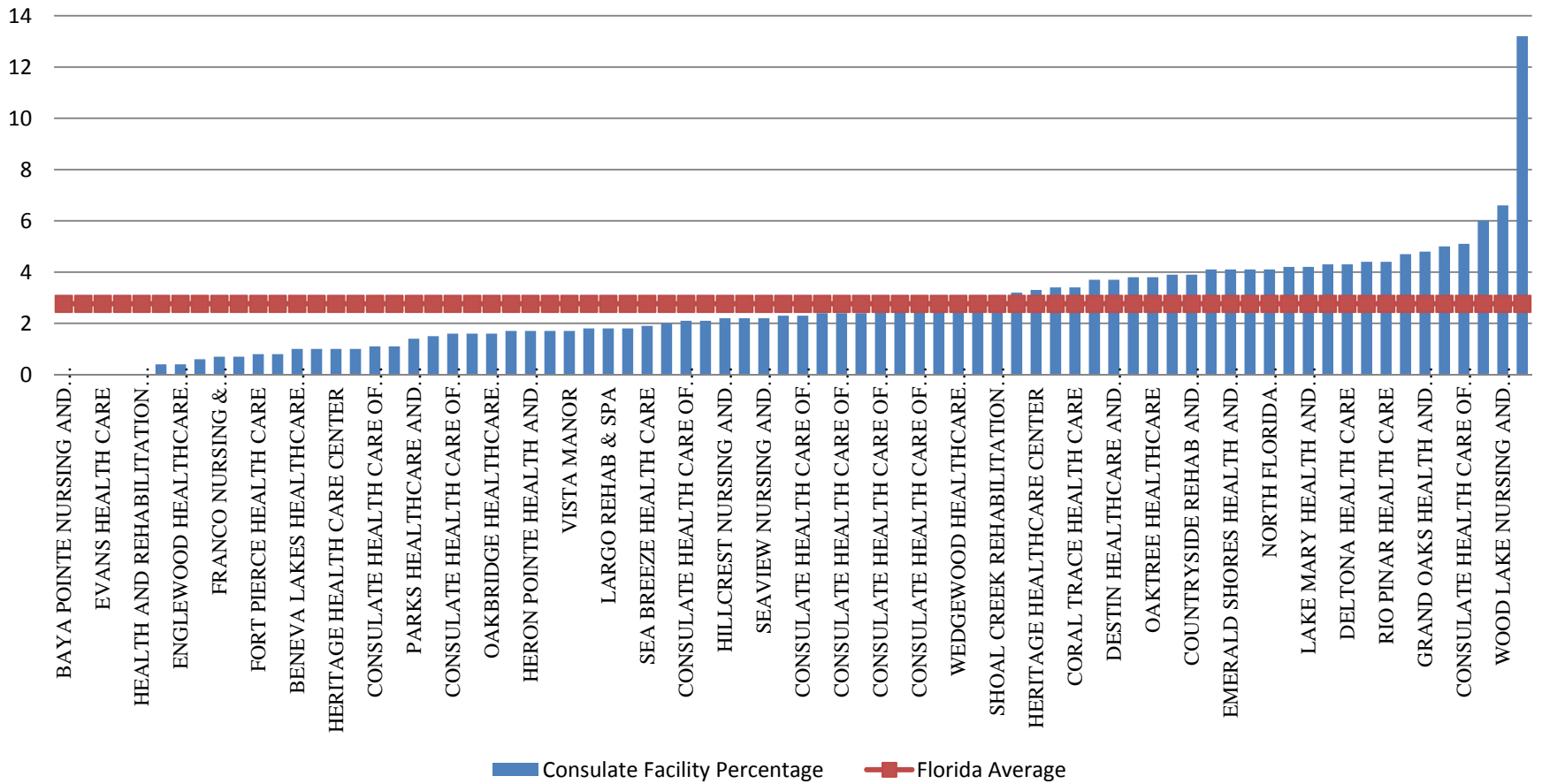
Falls can happen frequently among the elderly. Some of the injuries that can result from a fall are:

- Bone fractures
- Joint dislocations
- Closed head injuries
- Subdural hematoma
- Altered consciousness^{xvii}

43% of reporting Consulate Florida facilities have a higher percentage of long-stay residents experiencing one or more falls with major injury than the Florida average. Osprey Point Nursing Center had the highest percentage – 13.2% (4.7 times the Florida average).

2013-1Q Consulate Facilities vs Florida Average

Percent of long-stay residents experiencing one or more falls with major injury.



Appendix A

Nursing Home Name	City
BAY BREEZE (HERITAGE HEALTH CARE CENTER)	Venice
BAYA POINTE NURSING AND REHABILITATION CENTER	Lake City
BENEVA LAKES HEALTHCARE AND REHABILITATION CENTER	Sarasota
BRADENTON HEALTH CARE	Bradenton
BRANDON HEALTH AND REHABILITATION CENTER	Brandon
CENTRAL PARK HEALTHCARE AND REHABILITATION CENTER	Brandon
COLONIAL LAKES HEALTH CARE	Winter Garden
CONSULATE HEALTH CARE AT LAKE PARKER	Lakeland
CONSULATE HEALTH CARE AT WEST ALTAMONTE	Altamonte Springs
CONSULATE HEALTH CARE OF BAYONET POINT	Hudson
CONSULATE HEALTH CARE OF BRANDON	Brandon
CONSULATE HEALTH CARE OF JACKSONVILLE	Jacksonville
CONSULATE HEALTH CARE OF KISSIMMEE	Kissimmee
CONSULATE HEALTH CARE OF LAKELAND	Lakeland
CONSULATE HEALTH CARE OF MELBOURNE	Melbourne
CONSULATE HEALTH CARE OF NEW PORT RICHEY	New Port Richey
CONSULATE HEALTH CARE OF NORTH FORT MYERS	North Fort Myers
CONSULATE HEALTH CARE OF ORANGE PARK	Orange Park
CONSULATE HEALTH CARE OF PENSACOLA	Pensacola
CONSULATE HEALTH CARE OF PORT CHARLOTTE	Port Charlotte
CONSULATE HEALTH CARE OF SAFETY HARBOR	Safety Harbor
CONSULATE HEALTH CARE OF SARASOTA	Sarasota
CONSULATE HEALTH CARE OF ST PETERSBURG	Seminole
CONSULATE HEALTH CARE OF TALLAHASSEE	Tallahassee
CONSULATE HEALTH CARE OF VERO BEACH	Vero Beach
CONSULATE HEALTH CARE OF WEST PALM BEACH	West Palm Beach
CONSULATE HEALTH CARE OF WINTER HAVEN	Winter Haven
CORAL BAY HEALTHCARE AND REHABILITATION	West Palm Beach
CORAL TRACE HEALTH CARE	Cape Coral
COUNTRYSIDE REHAB AND HEALTHCARE CENTER	Palm Harbor
DELTONA HEALTH CARE	Deltona
DESTIN HEALTHCARE AND REHABILITATION CENTER	Destin
EMERALD SHORES HEALTH AND REHABILITATION	Callaway
ENGLEWOOD HEALTHCARE AND REHAB	Englewood
EVANS HEALTH CARE	Fort Myers

FLETCHER HEALTH AND REHABILITATION CENTER	Tampa
FORT PIERCE HEALTH CARE	Fort Pierce
FRANCO NURSING AND REHABILITATION CENTER	Miami
GOVERNORS CREEK HEALTH AND REHABILITATION	Green Cove Springs
GRAND OAKS HEALTH AND REHABILITATION CENTER	Palm Coast
HABANA HEALTH CARE CENTER	Tampa
HARBOR BEACH NURSING AND REHABILITATION CENTER	Fort Lauderdale
HARTS HARBOR HEALTH CARE CENTER	Jacksonville
HEALTH AND REHABILITATION CENTRE AT DOLPHINS VIEW	South Pasadena
HEALTH CENTER AT BRENTWOOD	Lecanto
HERITAGE HEALTHCARE AND REHABILITATION CENTER	Naples
HERITAGE HEALTHCARE CENTER	Tallahassee
HERITAGE PARK CARE AND REHABILITATION CENTER	Fort Myers
HERON POINTE HEALTH AND REHABILITATION	Brooksville
HILLCREST NURSING AND REHABILITATION CENTER	Hollywood
ISLAND HEALTH AND REHABILITATION CENTER	Merritt Island
KEYSTONE REHABILITATION AND HEALTH CENTER	Kissimmee
LAKE MARY HEALTH AND REHABILITATION CENTER	Lake Mary
LAKESIDE OAKS CARE CENTER	Dunedin
LARGO REHAB AND SPA	Largo
MAGNOLIA HEALTH AND REHABILITATION CENTER	Sarasota
MARSHALL HEALTH AND REHABILITATION CENTER	Perry
NORTH FLORIDA REHABILITATION AND SPECIALTY CARE	Gainesville
OAKBRIDGE HEALTHCARE CENTER	Lakeland
OAKTREE HEALTHCARE	South Daytona
OSPREY POINT NURSING CENTER	Bushnell
PARKS HEALTHCARE AND REHABILITATION CENTER	Orlando
PLANTATION BAY REHABILITATION CENTER	St Cloud
RENAISSANCE HEALTH AND REHABILITATION	West Palm Beach
RIO PINAR HEALTH CARE	Orlando
ROSEWOOD HEALTH AND REHABILITATION CENTER	Orlando
SAN JOSE HEALTH AND REHABILITATION CENTER	Jacksonville
SEA BREEZE HEALTH CARE	Panama City
SEAVIEW NURSING AND REHABILITATION CENTER	Pompano Beach
SHOAL CREEK REHABILITATION CENTER	Crestview
SPRING HILL HEALTH AND REHABILITATION CENTER	Brooksville
THE PALMS REHABILITATION AND HEALTHCARE CENTER	Palm Bay
UNIVERSITY HILLS HEALTH AND REHABILITATION	Pensacola

VISTA MANOR	Titusville
WEDGEWOOD HEALTHCARE CENTER	Lakeland
WOOD LAKE NURSING AND REHABILITATION CENTER	West Palm Beach

Appendix B Consulate Facility Staffing Levels by Facility

Nursing Home Name	City	CNA Hours Per Res Per Day
HEALTH CENTER AT BRENTWOOD	Lecanto	1.92
BAYA POINTE NURSING AND REHABILITATION CENTER	Lake City	2.32
SEA BREEZE HEALTH CARE	Panama City	2.37
CONSULATE HEALTH CARE OF WEST PALM BEACH	West Palm Beach	2.38
WEDGEWOOD HEALTHCARE CENTER	Lakeland	2.41
EVANS HEALTH CARE	Fort Myers	2.42
LAKE MARY HEALTH AND REHABILITATION CENTER	Lake Mary	2.43
HERITAGE PARK CARE AND REHABILITATION CENTER	Fort Myers	2.47
THE PALMS REHABILITATION AND HEALTHCARE CENTER	Palm Bay	2.47
HERON POINTE HEALTH AND REHABILITATION	Brooksville	2.48
DESTIN HEALTHCARE AND REHABILITATION CENTER	Destin	2.49
CONSULATE HEALTH CARE OF SARASOTA	Sarasota	2.51
GRAND OAKS HEALTH AND REHABILITATION CENTER	Palm Coast	2.51
BAY BREEZE (HERITAGE HEALTH CARE CENTER)	Venice	2.51
NORTH FLORIDA REHABILITATION AND SPECIALTY CARE	Gainesville	2.51
VISTA MANOR	Titusville	2.51
CONSULATE HEALTH CARE OF BAYONET POINT	Hudson	2.52
BENEVA LAKES HEALTHCARE AND REHABILITATION CENTER	Sarasota	2.53
BRANDON HEALTH AND REHABILITATION CENTER	Brandon	2.53
ENGLEWOOD HEALTHCARE AND REHAB	Englewood	2.53
HILLCREST NURSING AND REHABILITATION CENTER	Hollywood	2.54
CONSULATE HEALTH CARE OF SAFETY HARBOR	Safety Harbor	2.55
HERITAGE HEALTHCARE AND REHABILITATION CENTER	Naples	2.55
PARKS HEALTHCARE AND REHABILITATION CENTER	Orlando	2.55
CONSULATE HEALTH CARE OF JACKSONVILLE	Jacksonville	2.57
HABANA HEALTH CARE CENTER	Tampa	2.57
ROSEWOOD HEALTH AND REHABILITATION CENTER	Orlando	2.57

SEAVIEW NURSING AND REHABILITATION CENTER	Pompano Beach	2.58
FLETCHER HEALTH AND REHABILITATION CENTER	Tampa	2.59
KEYSTONE REHABILITATION AND HEALTH CENTER	Kissimmee	2.59
MAGNOLIA HEALTH AND REHABILITATION CENTER	Sarasota	2.59
RENAISSANCE HEALTH AND REHABILITATION	West Palm Beach	2.59
CONSULATE HEALTH CARE OF MELBOURNE	Melbourne	2.6
CONSULATE HEALTH CARE OF VERO BEACH	Vero Beach	2.6
BRADENTON HEALTH CARE	Bradenton	2.61
CONSULATE HEALTH CARE OF PENSACOLA	Pensacola	2.61
LARGO REHAB AND SPA	Largo	2.61
CENTRAL PARK HEALTHCARE AND REHABILITATION CENTER	Brandon	2.64
HERITAGE HEALTHCARE CENTER	Tallahassee	2.64
LAKESIDE OAKS CARE CENTER	Dunedin	2.64
MARSHALL HEALTH AND REHABILITATION CENTER	Perry	2.64
COLONIAL LAKES HEALTH CARE	Winter Garden	2.65
CONSULATE HEALTH CARE OF LAKELAND	Lakeland	2.65
CONSULATE HEALTH CARE OF NEW PORT RICHEY	New Port Richey	2.65
SPRING HILL HEALTH AND REHABILITATION CENTER	Brooksville	2.65
CONSULATE HEALTH CARE OF BRANDON	Brandon	2.66
RIO PINAR HEALTH CARE	Orlando	2.66
HARTS HARBOR HEALTH CARE CENTER	Jacksonville	2.67
CONSULATE HEALTH CARE AT LAKE PARKER	Lakeland	2.69
FORT PIERCE HEALTH CARE	Fort Pierce	2.69
ISLAND HEALTH AND REHABILITATION CENTER	Merritt Island	2.7
CONSULATE HEALTH CARE OF ST. PETERSBURG	Seminole	2.71
UNIVERSITY HILLS HEALTH AND REHABILITATION	Pensacola	2.71
OAKTREE HEALTHCARE	South Daytona	2.72
CONSULATE HEALTH CARE OF PORT CHARLOTTE	Port Charlotte	2.73
CONSULATE HEALTH CARE OF ORANGE PARK	Orange Park	2.74
FRANCO NURSING & REHABILITATION CENTER	Miami	2.74
COUNTRYSIDE REHAB AND HEALTHCARE CENTER	Palm Harbor	2.76
SAN JOSE HEALTH AND REHABILITATION CENTER	Jacksonville	2.77
CONSULATE HEALTH CARE AT WEST ALTAMONTE	Altamonte Springs	2.79
OAKBRIDGE HEALTHCARE CENTER	Lakeland	2.79
SHOAL CREEK REHABILITATION CENTER	Crestview	2.8
DELTONA HEALTH CARE	Deltona	2.81
OSPREY POINT NURSING CENTER	Bushnell	2.82
CORAL BAY HEALTHCARE AND REHABILITATION	West Palm Beach	2.83

HEALTH AND REHABILITATION CENTRE AT DOLPHINS VIEW	South Pasadena	2.83
GOVERNORS CREEK HEALTH AND REHABILITATION	Green Cove Springs	2.84
CONSULATE HEALTH CARE OF NORTH FORT MYERS	North Fort Myers	2.86
CORAL TRACE HEALTH CARE	Cape Coral	2.88
CONSULATE HEALTH CARE OF TALLAHASSEE	Tallahassee	2.9
CONSULATE HEALTH CARE OF KISSIMMEE	Kissimmee	2.96
EMERALD SHORES HEALTH AND REHABILITATION	Callaway	2.99
PLANTATION BAY REHABILITATION CENTER	St Cloud	3.01
HARBOR BEACH NURSING AND REHABILITATION CENTER	Fort Lauderdale	3.08
CONSULATE HEALTH CARE OF WINTER HAVEN	Winter Haven	3.12
WOOD LAKE NURSING AND REHABILITATION CENTER	West Palm Beach	3.18

Appendix C Staffing Ratio Methodology

To compare the ratios to the Florida average, staffing for first quarter 2013 for CNAs and LPNs for each of the 76 Consulate nursing home facilities (listed in Appendix A) was pulled from the Nursing Home Compare Data Base using SQL coding. The quality measure data collected by CMS is done through surveys conducted at all nursing home facilities. These surveys are entered into the Minimum Data Set (MDS) data base that aggregates information from all Medicare patients. Nursing homes have their own systems of filling out MDS surveys that are then managed by the MDS Coordinator, a hired employee of each nursing home facility. Each nursing home facility has a different process and timeline for filling out MDS surveys. MDS information also comes from state inspection surveys, most of which are conducted once every 15 months. This information is then collected in the Nursing Home Compare Data Base.

To calculate the Florida average, we averaged the CNA staffing ratio for first quarter for 683 nursing homes in Florida.

Appendix D Quality Measures Methodology

To calculate the value for the nine quality measures for each of the facilities, data was pulled from the Nursing Home Compare Data Base managed by the Centers for Medicare and Medicaid Services for the first quarter of 2013 for the following indicators:

The following nine quality measures were used:

<i>Long-stay</i>	
1. Percent of high-risk long-stay residents who have pressure sores; Percent of long-stay high-risk residents with pressure ulcers.	Lower percentages are better
2. Percent of long-stay residents who are more depressed or anxious; Percent of long-stay residents who have depressive symptoms.	Lower percentages are better
3. Percent of long-stay residents who were physically restrained.	Lower percentages are better
4. Percent of long-stay residents who have moderate to severe pain; Percent of long-stay residents who self-report moderate to severe pain.	Lower percentages are better
5. Percent of long-stay residents experiencing one or more falls with major injury.	Lower percentages are better
6. Percent of long-stay residents who received an antipsychotic medication.	Lower percentages are better
<i>Short-stay</i>	
7. Percent of short-stay residents who had moderate to severe pain; Percent of short-stay residents who self-report moderate to severe pain.	Lower percentages are better
8. Percent of short-stay residents who have pressure sores; Percent of short-stay residents with pressure ulcers that are new or worsened.	Lower percentages are better
9. Percent of short-stay residents who newly received an	Lower percentages are better

antipsychotic medication.	
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The quality measure data collected by CMS is done through surveys conducted at all nursing home facilities. These surveys are entered into the Minimum Data Set database that aggregates information from all Medicare patients. Nursing homes have their own systems of filling out MDS surveys that are then managed by the MDS Coordinator, a hired employee of each nursing home facility. Each nursing home facility has a different process and timeline for filling out MDS surveys. MDS information also comes from state inspection surveys, most of which are conducted once every 15 months. This information is then collected in the Nursing Home Compare Data Base.

For each of the 76 Consulate facilities' individual facility value, we used the average of the three most recent data points. This was used because it is calculated by the Centers for Medicare and Medicaid Services and it is the value published on the Nursing Home Compare Care website.

To calculate the Florida average, we averaged the average of the three most recent data points for 683^{xviii} nursing home facilities. These averages were then compared to 76^{xix} individual Consulate facilities for the same nine quality measures listed below.

The following Nursing Home Quality Measures were not available for the first quarter 2013 so those facilities were not included in the analysis for that quality measure.

Nursing Home Name	Quality Measure
BRADENTON HEALTH CARE	Percent of long-stay residents who self-report moderate to severe pain.
MARSHALL HEALTH AND REHABILITATION CENTER	Percent of short-stay residents who self-report moderate to severe pain.
SEAVIEW NURSING AND REHABILITATION CENTER	Percent of short-stay residents who self-report moderate to severe pain.
LAKESIDE OAKS CARE CENTER	Percent of short-stay residents who self-report moderate to severe pain.
OAKTREE HEALTHCARE	Percent of short-stay residents with pressure ulcers that are new or worsened.
GOVERNORS CREEK HEALTH AND REHABILITATION	Percent of short-stay residents who newly received an antipsychotic medication.
OAKTREE HEALTHCARE	Percent of short-stay residents who newly received an antipsychotic medication.
SEA BREEZE HEALTH CARE	Percent of short-stay residents who newly received an antipsychotic medication.
SEAVIEW NURSING AND	Percent of short-stay residents who newly received an

REHABILITATION CENTER	antipsychotic medication.
RENAISSANCE HEALTH AND REHABILITATION	Percent of short-stay residents who newly received an antipsychotic medication.

ⁱ Nursing Home Compare and Florida Health Finder, 2010-2013

ⁱⁱ “1 in 5 Nursing Homes on Watch List”, *Health News Florida*, January 2, 2013

ⁱⁱⁱ <http://www.bizjournals.com/orlando/print-edition/2013/07/19/fast-50-consulate-health-care.html>

^{iv} <http://www.bizjournals.com/orlando/print-edition/2013/07/19/fast-50-consulate-health-care.html>

^v <http://www.bizjournals.com/orlando/print-edition/2013/07/19/fast-50-consulate-health-care.html>

^{vi} Consulate Health Home Office Cost Report 2011 submitted to the Agency for Health Care Administration

^{vii} <http://www.forbes.com/sites/sageworks/2012/03/22/taking-the-pulse-of-nursing-care-centers/2/>

^{viii} <http://consulatehealthcare.com/about-us>

^{ix} N. G. Castle and R. A. Anderson, "Caregiver Staffing in Nursing Homes and Their Influence on Quality of Care: Using Dynamic Panel Estimation Methods," *Medical Care*, June 2011 49(6):545–52.

^x <http://www.commonwealthfund.org/Publications/In-Brief/2011/Sep/Caregiver-Staffing-in-Nursing-Homes-and-Quality-of-Care.aspx>

^{xi} Harrington, C., Olney, B., Carrillo, H. and Kang, T. (2012), Nurse Staffing and Deficiencies in the Largest For-Profit Nursing Home Chains and Chains Owned by Private Equity Companies. *Health Services Research*, 47: 106–128. doi: 10.1111/j.1475-6773.2011.01311.x

^{xii} <http://onlinelibrary.wiley.com/doi/10.1111/j.1475-6773.2011.01311.x/abstract>

^{xiii} Interview with Certified Nursing Assistants employed at Consulate facilities September 18, 2013

^{xiv} <http://www.medicare.gov/nursinghomecompare/search.html>.

^{xv} <http://www.fda.gov/Drugs/DrugSafety/PostmarketDrugSafetyInformationforPatientsandProviders/DrugSafetyInformationforHeathcareProfessionals/PublicHealthAdvisories/ucm053171.htm>

^{xvi} <http://www.medicare.gov/NursingHomeCompare/Data/Long-Stay-Residents.html>

^{xvii} <http://www.medicare.gov/NursingHomeCompare/Data/Long-Stay-Residents.html>

^{xviii} The most recent total number of nursing home facilities in Florida, pulled from the Centers for Medicaid and Medicare MDS using SQL

^{xix} <http://www.consulatemgt.com/locations/state/FL>