



Division of Developmental Disabilities
401 S. Clinton, 6th Floor Chicago, IL 60607

July 12, 2024

Jason Upham
Broadstep
100 Main Street, Ste. B.
Kingstree, SC 29556

Re: Notice of Revocation of the Community Integrated Living Arrangement (CILA) license of Broadstep
CILA License # 200300004C

Mr. Upham,

This letter is to notify you that the Illinois Department of Human Services (IDHS or Department), Division of Developmental Disabilities (DDD), hereby revokes the Community Integrated Living Arrangement (CILA) license of Broadstep, effective close of business September 12, 2024. Revocation is warranted as follows under 59 Ill. Adm. Code 115.440

- a) The Department may revoke a license at any time if the agency:
 - 1) Fails to comply with the service requirements identified in Subpart B of this Part.
 - 2) Fails to comply with the general agency requirements identified in Subpart C of this Part.

Specifically, Broadstep has engaged in the following actions or inactions in violation of 59 Ill. Admin. Code 115.230(b)(1), (b)(2), (b)(3), (b)(4), (b)(8), 59 Ill. Admin. Code 115.240(a)(g), 59 Ill. Admin. Code 115.300 (c)(4,7(B),9(A-F), 59 Ill. Admin. Code 115.320 (b)(3)(A-D), (b)(6)(A-C), (d)(1)(A,D, G,H, J, L, M), (d)(3)and (g)(2,4).

Bureau of Clinical Services

- July 5-6, 11-15, 2022, DDD Clinical Services/Nursing provided onsite technical assistance (TA). Medication administration issues were identified and Authorized Direct Support Professionals (ADSPs) in Springfield homes were deauthorized to pass medications. Temporary agency staff were used to administer medications because of deauthorized ADSPs. DDD Nurses (RNs) were on site to ensure medications administration were done correctly.
 - ADSP files lacked required documentation. Specifically, review of ADSP files showed no consistent evidence of the following:
 - High School Diploma/GED
 - Functional literacy test
 - CPR/FA certification
 - Health Care Worker Registry (HCWR) check
 - No evidence of required medication class and test passed
 - No evidence of Competency Based Training Assessment (CBTA).

- Medication review noted documentation and protocol deficiencies in the following:
 - Controlled substance count sheets were not completed
 - Medication Administration Records (MAR) were not completed correctly
 - Medication error reports were not completed correctly
 - Registered Nurse Trainer (RNT) did not review medication error reports
 - PRN medications were not documented properly
 - Medications were not secured
 - Medication bubble cards not consistently removed which impacted ability to accurately assess if medications were given as prescribed.
- October 18-20, 2022, a focus review was conducted for Springfield area homes.
 - Medication review noted repeated documentation and protocol deficiencies in the following:
 - Controlled substance count sheets were not completed
 - Medication Administration Records (MAR) were not completed correctly
 - Medication error reports do not correspond with errors on MARs
 - Registered Nurse Trainer (RNT) did not review medication error reports
 - PRN medications were not documented properly (no physician orders)
 - Medications were not secured
 - Medication bubble cards not consistently removed which impacted ability to accurately assess if medications were given as prescribed
- November 1-3, 2022, a follow up review was conducted from April Rule 116 review.
 - Medication review noted repeated deficiencies regarding the following:
 - No CPR/FA certification on file
 - Controlled substance count sheets were not completed
 - Medication administration records (MAR) were not completed correctly
 - Medication error reports do not correspond with errors on MARs
 - RNT did not review medication error reports
 - PRN medications were not documented properly (no physician orders)
 - Medications were not secured
 - No evidence of training for new medications
 - During the review, additional concerns were identified that were staff not aware of medication disposal protocol
- May 9-11, 2023, Clinical/Nursing conducts a Rule 116 review. Medication administration issues were identified and ADSPs deauthorized to pass medications.
 - Review of ADSP files continued to be deficient, with no consistent evidence of the following:
 - No functional literacy tests



- No current CPR/FA certification
- No HCWR check,
- No evidence of medication administration class completed, and test passed
- No evidence of CBTA
- During this review, additional citations were issued for the following:
 - no annual reauthorization of ADSPs
 - lack of individual nursing assessments
 - lack of Self Administration of Medication Assessment (SAMA)
 - no policies or procedures for medication administration
- Medication review noted repeated deficiencies regarding the following:
 - Missing controlled substance count sheets,
 - MARs were not completed correctly
 - Medication error reports do not correspond with errors on MARs
 - RNT did not complete a review of medication error reports
 - PRN medications not documented properly (no physician orders)
 - Medications were not secured
 - No training for new medication,
 - Staff not aware of medication disposal protocol
- January 16-19, 2024, Clinical/Nursing conducts a Rule 116 review. Medication administration issues were identified and ADSPs deauthorized to pass medications.
 - Review of ADSP files showed continued deficiencies with no consistent evidence of the following:
 - Functional literacy test
 - HCWR checks
 - No evidence of required medication class and test passed
 - No evidence of CBTA
 - Lack of individual nursing assessments
 - Lack of SAMAs
 - No policies and procedures for medication administration
 - No annual reauthorization of ADSPs
 - Medication review noted repeated deficiencies regarding the following:
 - Controlled substance count sheets done incorrectly
 - MARs done incorrectly
 - Missing Medication error reports
 - RNT did not complete review of medication error reports
 - PRN medications not documented correctly
 - Medications not secured
 - Staff not aware of medication disposal protocol



In addition, expired medications were found at sites.

Bureau of Quality Management (BQM)

- July 13, 2022, BQM conducted a focus review. Significant repeated deficiencies were found specifically;
 - DSP training records and background checks were not done specifically;
 - OIG Rule 50 training
 - Healthcare Worker Registry (HCWR) check
 - Department of Children and Family Services (DCFS) mandated reporter training
 - Child Abuse and Neglect Tracking System (CANTS) screen
 - Illinois State Police (ISP) check
 - Illinois Sex Offender (ISO) check
 - HFS/OIG check
 - Adult Protective Services (APS) check
 - Direct Support Professional (DSP) trainings were not completed
 - Qualified Intellectual Disabilities Professional (QIDP) training were not completed

- February 2, 2023, BQM conducted waiver sample review.
 - The following repeated deficiencies were found;
 - OIG Rule 50 training
 - Healthcare Worker Registry (HCWR) check
 - DCFS mandated reporter training
 - CANTS
 - ISP check
 - ISO check
 - HFS/OIG check
 - APS check
 - DSP trainings were not completed
 - QIDP training were not completed
 - Repeat citations were also issued for deficiencies regarding;
 - Individuals' implementation strategies (IS)
 - IS were not present for review
 - IS were not developed in required timeframe
 - IS were not reviewed/signed by guardian
 - IS were not provided to all parties
 - IS were not updated annually
 - IS did not use required DDD format
 - No evidence of ongoing monitoring of IS
 - Restrictive interventions or HCBS settings modifications



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- Not included in the IS, Behavior Support Plan
 - No prior attempts to pursue less restrictive or positive interventions.
 - Rights restrictions were not reviewed by Human Rights Committee
 - Behavior supports plans:
 - No functional behavior assessment completed
 - Did not follow guidelines established in agency behavior treatment plan
 - Individual critical incidents were not reported per DDD guidelines.
- August 7, 2023, BQM conducted focus review.
 - Repeated deficiencies with citations regarding the following;
 - OIG Rule 50 training
 - Healthcare Worker Registry (HCWR) check
 - DCFS mandated reporter training
 - CANTS
 - ISP check
 - ISO check
 - HFS/OIG check
 - APS check
 - DSP trainings were not completed.
 - QIDP training were not completed.
 - Repeated citations also issued for the following;
 - Individuals' implementation strategies (IS)
 - IS were not present for review
 - IS were not developed in required timeframe
 - IS were not reviewed/signed by guardian
 - IS were not provided to all parties
 - IS were not updated annually
 - IS did not use required DDD format
 - No evidence of ongoing monitoring of IS
 - Restrictive interventions or home and community-based services (HCBS) settings modifications
 - Not included in the IS, Behavior Support Plan
 - No prior attempts to pursue less restrictive or positive interventions.
 - Rights restrictions were not reviewed by Human Rights Committee
 - Behavior supports plans
 - No functional behavior assessment completed
 - Did not follow guidelines established in agency behavior treatment plan
 - Individual critical incidents were not reported per DDD guidelines.



- April 22, 2024, BQM conducted waiver sample review.
 - Repeated deficiencies with citations regarding the following;
 - OIG Rule 50 training
 - CANTS
 - ISO check
 - HFS/OIG check
 - Repeated citations were also issued for deficiencies of the following;
 - Individuals' implementation strategies (IS)
 - IS were not present for review.
 - IS were not reviewed/signed by guardian.
 - No evidence of ongoing monitoring of IS.
 - Rights restrictions were not reviewed by Human Rights Committee
 - Behavior supports plans.
 - No functional behavior assessment completed.
 - Did not follow guidelines established in agency behavior treatment plan.
 - Individual critical incidents were not reported per DDD guidelines.

Bureau of Accreditation, Licensing, and Certification (BALC)

- August 22-26, 2022, BALC conducted an annual survey resulting in a level 5 rating. An admission hold sanction was issued as a result of BALC survey and citations from BQM reviews and Clinical/Nursing TA and Rule 116 reviews.
- December 12-16, 2022, BALC conducted follow up survey. Broadstep showed slight improvement however repeat violations occurred regarding;
 - No regular safety drills completed
 - No quarterly safety inspections completed,
 - Overall safety/cleanliness of sites inspected,
 - Required background checks for DSPs
 - HCWR check
 - CANTS check
 - ISO check
 - HFS/OIG check
 - Implementation strategies
 - IS were not present for review
 - IS were not reviewed/signed by guardian
 - No evidence of ongoing monitoring of IS



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- August 7-11, 2023, BALC conducted focus review. Repeat citations included;
 - No consents on file
 - No physician orders for medications, either for self-administration of medication program
 - Improper water temperature checks at various sites,
 - Overall cleanliness of homes
 - Required background checks for DSPs
 - HCWR check
 - CANTS check
 - ISO check
 - HFS/OIG check
 - Implementation Strategies
 - No implementation strategies available for review
 - Implementation strategies not signed/reviewed by guardian.

The DDD has been providing technical assistance from several Bureaus since September 2022. Despite multiple plans of correction and corrective action plans and personalized assistance from DDD, the deficiencies continue. Every effort has been made to with Broadstep to not only address these deficiencies but to implement a system to maintain compliance. As a result, your CILA license will be revoked effective close of business on September 12, 2024.

This revocation includes the following homes listed below. All residents will be transferred to alternate providers for continuation of Waiver services:

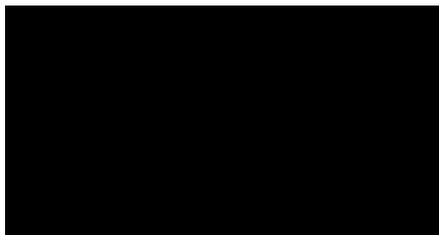




JB Pritzker, Governor

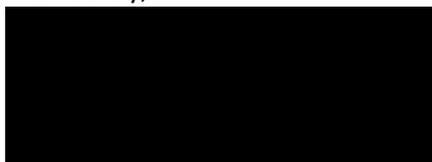
Dulce M. Quintero, Secretary Designate

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You have the right to contest the Department's decision pursuant to 59 Ill. Adm. Code 115.470. A written request for a hearing must be submitted within 20 working days of the postmark on this letter to the Department's Bureau of Hearings at 69 W. Washington, 4th floor Chicago, IL 60602, or email at DHS.BAH@illinois.gov.

Sincerely,



Tonya Piephoff
Director
Division of Developmental Disabilities