

**Action Plan Summary  
May 2019**

Over the past few months, the entire staff of Baylor St. Luke's Medical Center, including physicians, nurses, and hospital leaders met with experts from the Centers for Medicare & Medicaid Services (CMS) as they conducted a full-scale review of our entire operation. We thank them for their thorough and professional review of all our policies and practices.

The Plans of Correction outline actions and major initiatives we are have put into place to correct the deficiencies noted by CMS. Specifically, we have done the following:

**Patient Safety**

- Strengthened our policies to make sure staff and physicians document informed consent of patients prior to all procedures
- Conducted trainings to reinforce current policies for nursing care, including policies that prevent falls and the proper set up of the hemodialysis machine
- Redesigned the process to better guide physicians as they track access to all psychotropic medications administered to patients

**Hospital Governance**

- Added oversight responsible for monitoring the performance and effectiveness of all hospital departments, including dietary services, infection control, surgery services, and pharmacy services
- Increased the frequency of inspections to identify areas in need of repair throughout the hospital environment
- Conducted background checks for tenured employees who were hired before such checks were mandatory
- Created a new policy and formed a new committee to control access to narcotics inventory

**Food and Nutrition Services**

- Fixed or replaced equipment in the kitchen that were not functioning properly, including dishwashers and refrigerators, to ensure safe handling of food
- Created two new hospital positions which will be responsible for overseeing food sanitation standards and infection control practices specific to the kitchen
- Repaired sewer drains in the kitchen to maintain a sanitary environment

**Infection Control**

- Added new procedures to improve infection control, including additional oversight of the proper wearing of personal protective equipment (PPE) and cleaning of equipment
- Provided additional training for staff responsible for maintaining sterility of medical equipment and the compounding area of the pharmacy
- Instituted a new process to clean patient rooms and prevent cross contamination while conducting housekeeping services
- Refurbished the procedural areas and replaced older equipment to ensure patient safety