



# Paradigm at Faith Memorial

## Nursing Facility Abuse, Neglect, Exploitation, and Misappropriation

### Results in Brief

#### Why OIG Conducted This Inspection

In 2020 and 2021, the U.S. Department of Health and Human Services Office of Inspector General conducted audits of nursing facilities that reported allegations of potential abuse or neglect of Medicaid beneficiaries. The audits determined California, Florida, and New Jersey did not comply with federal requirements to report potential abuse or neglect of Medicaid beneficiaries. The Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Inspections) initiated this inspection to determine whether the issues found in the 2020 and 2021 reports were present in Texas Medicaid nursing facilities.

#### Summary of Review

The inspection objective was to determine whether Paradigm at Faith Memorial (Faith Memorial) has processes and procedures to document and report abuse, neglect, exploitation, and misappropriation incidents as required by state law. The inspection scope covered the period from September 1, 2022, through August 31, 2023.

For more information, contact:  
[OIGInspectionsReports@hhs.texas.gov](mailto:OIGInspectionsReports@hhs.texas.gov)

#### Key Results

Faith Memorial has policies and procedures that describe how to identify and report abuse, neglect, exploitation, and misappropriation. However, Faith Memorial did not comply with state requirements regarding provider investigation reports, employment checks, and training during orientation related to abuse, neglect, exploitation, and misappropriation. Specifically:

- Of 49 provider investigation reports tested, 43 (87.8 percent) had errors with timeliness or retention. Nursing facilities must report incidents of suspected abuse, neglect, exploitation, and misappropriation within certain timeframes and retain the records of the incidents.
- Of 61 employee records tested:
  - 38 (62.3 percent) had late or inaccurate employment checks. Nursing facilities must check employment eligibility before an employee is hired and annually thereafter.
  - 18 (29.5 percent) did not contain documentation that employees received training during orientation related to identifying and reporting abuse, neglect, exploitation, and misappropriation. Nursing facilities must develop, implement, and maintain effective orientation training programs.

#### Recommendations

Faith Memorial should:

- Create and implement controls over its processes to report incidents and submit provider investigation reports timely and retain provider investigation reports as required.
- Create and implement controls over its processes to perform accurate and timely employment checks and maintain evidence of employment checks.
- Retain documentation to verify orientation training related to abuse, neglect, exploitation, and misappropriation is provided to all employees.

#### Management Response

Faith Memorial declined the opportunity to respond to the findings and recommendations in this report.