



Wyoming Department of Health Healthcare Licensing and Surveys

LeadingAge Wyoming **May 28, 2025**

Laura Hudspeth, SA Director

Pat Davis, Chief, LSC and Construction Branch

Tim Cozad, Chief LTC, Healthcare Surveillance
Branch



Wyoming Department of Health Healthcare Licensing and Surveys

Agenda:

- LSC Educational Opportunities
- Means of Egress
- LSC/EP and Survey Data
- Chapter 3 Construction Rules



Wyoming Department of Health Healthcare Licensing and Surveys

Agenda:

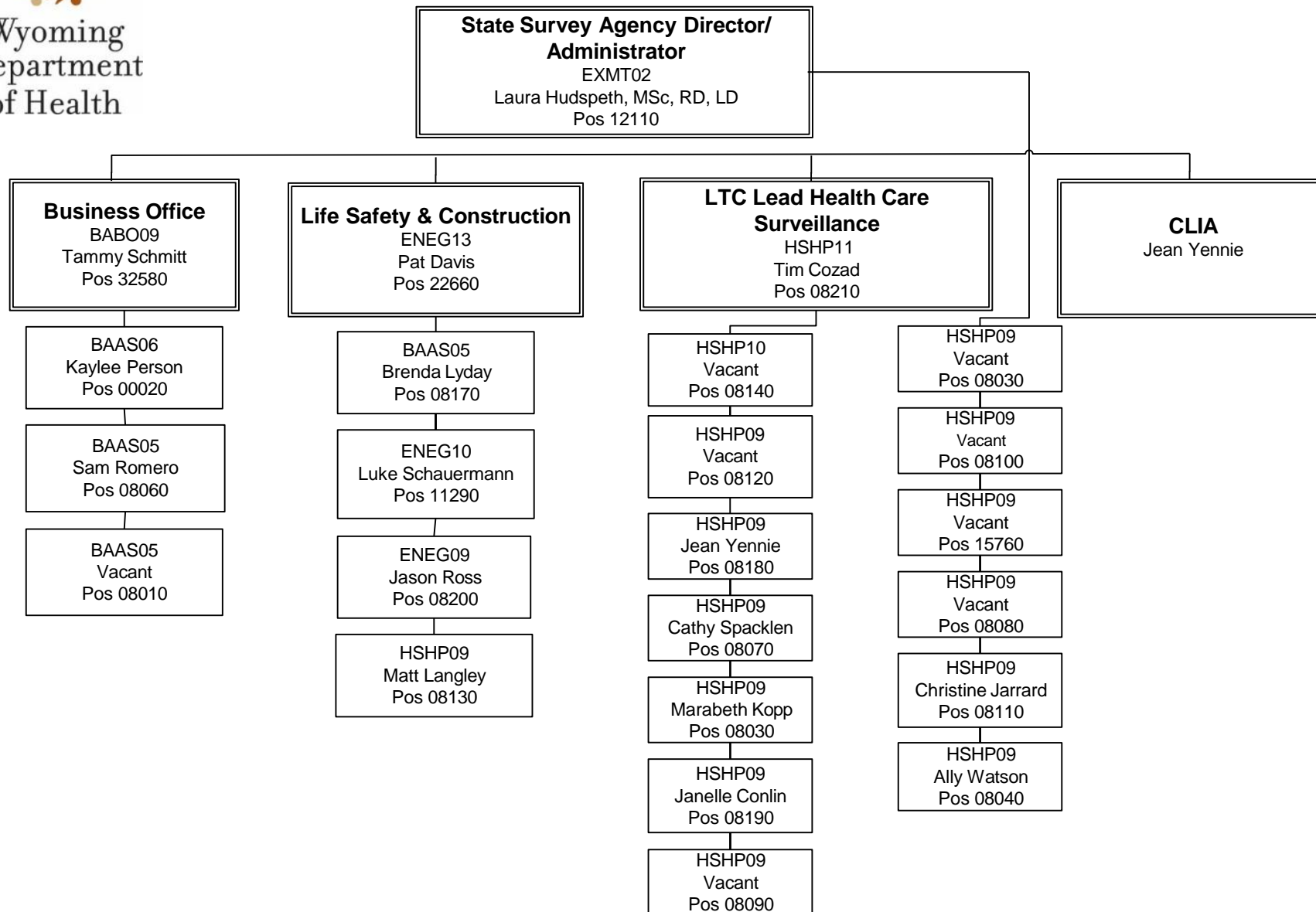
- Health Survey Data
- Nurse Aide Training and Testing
- New CMS Regulations Effective 4/28/25



Wyoming Department of Health Healthcare Licensing and Surveys

Agenda:

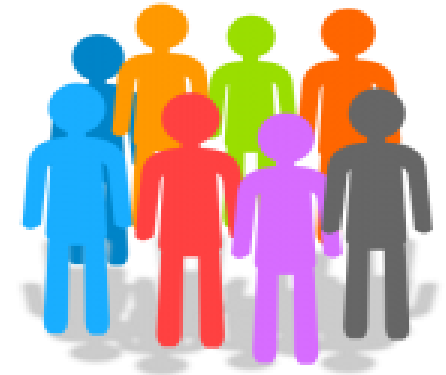
- Incident Database and Reporting
- Users for ePOC and Incident Database
- Past Non-compliance
- CMP Project Information





Wyoming Department of Health Healthcare Licensing and Surveys

HLS STAFFING Positions Filled



- Business Office – 3/4
- Healthcare Surveillance - 7/14
- LSC and Construction- 5/5

Educational Opportunities and Support

Facility Managers or Maintenance Directors are encouraged to participate in the Wyoming Society of Healthcare Engineers. Their mission statement reads:

"The Wyoming Society of Healthcare Engineering (WSHE) is an organization dedicated to presenting educational opportunities to promote safety and compliance for Healthcare facilities. The assistance received from the organizations that we are affiliated with such as ASHE, WHA and the Wyoming department of Health, enables our members to provide safe working environments through improved communications and knowledge."

Educational Opportunities and Support, Cont.

- HLS participates in the WSHE annual conference
- HLS provides information regarding the following:
 - CMS updates
 - Building Code updates
 - Updates to HLS Rules and Regulations
 - Technical assistance for items requested in advance
 - Q&A session to address any items from the audience
- Vendors and design professionals participate to provide additional training, product overviews, and networking



NURSING HOME STANDARD SURVEYS AVERAGE # OF LSC DEFICIENCIES

FFY	WYOMING	REGION	NATION
2018	4.0	4.8	4.6
2019	2.9	4.8	4.6
2020	4.1	5.1	4.5
2021	3.5	4.8	4.5
2022	6.0	4.5	4.6
2023	7.3	4.5	4.9
2024	4.0	4.4	5.0
2025 YTD	4.0	4.3	5.0

Nursing Homes

Most Frequently Cited Deficiencies

LIFE SAFETY CODE

FFY24 YEAR

Commit to your health.

NATIONAL		
Tag #	Description (9,892 Surveys)	% Survey s Cited
K0353	Sprinkler System - Maintenance and Testing	45.1%
K0918	Electrical Systems - Essential Electric System	32.6%
K0321	Hazardous Areas - Enclosure	26.1%
K0363	Corridor - Doors	25.5%
K0345	Fire Alarm System - Testing and Maintenance	25.4%
K0712	Fire Drills	24.3%
K0324	Cooking Facilities	21.7%
K0920	Electrical Equipment - Power Cords and Extens	21.2%
K0372	Subdivision of Building Spaces - Smoke Barrie	16.3%
K0211	Means of Egress - General	15.1%

REGIONAL		
Tag #	Description (388 Surveys)	% Survey s Cited
K0353	Sprinkler System - Maintenance and Testing	57.70%
K0712	Fire Drills	39.40%
K0918	Electrical Systems - Essential Electric System	35.80%
K0345	Fire Alarm System - Testing and Maintenance	33.50%
K0321	Hazardous Areas – Enclosure	26.80%
K0324	Cooking Facilities	22.70%
K0521	HVAC	20.60%
K0363	Corridor - Doors	19.60%
K0914	Electrical Systems - Maintenance and Testing	19.30%
K0291	Emergency Lighting	18.60%

WYOMING		
Tag #	Description (31 Surveys)	% Survey s Cited
K0345	Fire Alarm System - Testing and Maintenance	71.00%
K0353	Sprinkler System - Maintenance and Testing	64.50%
K0918	Electrical Systems - Essential Electric System	48.40%
K0321	Hazardous Areas - Enclosure	29.00%
K0761	Maintenance, Inspection and Testing - Doors	29.00%
K0914	Electrical Systems - Maintenance and Testing	25.80%
K0900	Health Care Facilities Code - Other	19.40%
K0920	Electrical Equipment - Power Cords and Extens	16.10%
K0521	HVAC	16.10%
K0291	Emergency Lighting	12.90%

Nursing Homes

Most Frequently Cited Deficiencies

EMERGENCY PREPAREDNESS

FFY24 YEAR

Commit to your health.

NATIONAL		
Tag #	Description (2,603 Surveys)	% Survey s Cited
E0039	EP Testing Requirements	37.0%
E0004	Develop EP Plan, Review and Update Annually	23.1%
E0041	Hospital CAH and LTC Emergency Power	21.2%
E0015	Subsistence Needs for Staff and Patients	15.4%
E0037	EP Training Program	13.6%
E0006	Plan Based on All Hazards Risk Assessment	12.2%
E0030	Names and Contact Information	9.8%
E0036	EP Training and Testing Roles Under a Waiver	8.8%
E0026	Declared by Secretary Development of EP Policies	8.6%
E0013	and Procedures	7.4%

REGIONAL		
Tag #	Description (45 Surveys)	% Survey s Cited
E0039	EP Testing Requirements	62.20%
E0004	Develop EP Plan, Review and Update Annually	28.90%
E0015	Subsistence Needs for Staff and Patients	13.30%
E0037	EP Training Program	8.90%
E0030	Names and Contact Information	8.90%
E0041	Hospital CAH and LTC Emergency Power	6.70%
E0023	Policies/Procedures for Medical Documentation	6.70%
E0029	Development of Communication Plan	4.40%
E0031	Emergency Officials Contact Information	4.40%
E0006	Plan Based on All Hazards Risk Assessment	4.40%

WYOMING		
Tag #	Description (7 Surveys)	% Survey s Cited
E0039	EP Testing Requirements	57.10%
E0004	Develop EP Plan, Review and Update Annually	42.90%
E0029	Development of Communication Plan	28.60%
E0031	Emergency Officials Contact Information	28.60%
E0041	Hospital CAH and LTC Emergency Power	28.60%
E0037	EP Training Program	14.30%
E0034	Information on Occupancy/Needs	14.30%

Nursing Homes

Most Frequently Cited Deficiencies

LIFE SAFETY CODE

FFY25 YEAR TO DATE

Commit to your health.

NATIONAL		
Tag #	Description (4,300 Surveys)	% Survey s Cited
K0353	Sprinkler System - Maintenance and Testing	47.10%
K0918	Electrical Systems - Essential Electric Syste	32.40%
K0363	Corridor - Doors	24.90%
K0345	Fire Alarm System - Testing and Maintenance	24.90%
K0321	Hazardous Areas - Enclosure	24.40%
K0712	Fire Drills	24.30%
K0324	Cooking Facilities	23.90%
K0920	Electrical Equipment - Power Cords and Extens	22.70%
K0372	Subdivision of Building Spaces - Smoke Barrie	16.00%
K0511	Utilities - Gas and Electric	15.40%

REGIONAL		
Tag #	Description (122 Surveys)	% Survey s Cited
K0353	Sprinkler System - Maintenance and Testing	49.20%
K0918	Electrical Systems - Essential Electric Syste	39.30%
K0712	Fire Drills	34.40%
K0321	Hazardous Areas - Enclosure	29.50%
K0324	Cooking Facilities	26.20%
K0345	Fire Alarm System - Testing and Maintenance	25.40%
K0222	Egress Doors	23.80%
K0291	Emergency Lighting	23.80%
K0363	Corridor - Doors	19.70%
K0355	Portable Fire Extinguishers	18.90%

WYOMING		
Tag #	Description (10 Surveys)	% Survey s Cited
K0918	Electrical Systems - Essential Electric Syste	100.00%
K0345	Fire Alarm System - Testing and Maintenance	60.00%
K0291	Emergency Lighting	50.00%
K0321	Hazardous Areas - Enclosure	50.00%
K0222	Egress Doors	40.00%
K0351	Sprinkler System - Installation	30.00%
K0271	Discharge from Exits	20.00%
K0712	Fire Drills	20.00%
K0923	Gas Equipment - Cylinder and Container Storag	20.00%
K0355	Portable Fire Extinguishers	20.00%

Nursing Homes

Most Frequently Cited Deficiencies

EMERGENCY PREPAREDNESS

FFY25 YEAR TO DATE

Commit to your health.

NATIONAL

Tag #	Description (1,082 Surveys)	% Survey s Cited
E0039	EP Testing Requirements	38.8%
E0004	Develop EP Plan, Review and Update Annually	23.1%
E0037	EP Training Program	16.1%
E0041	Hospital CAH and LTC Emergency Power	16.1%
E0015	Subsistence Needs for Staff and Patients	13.9%
E0006	Plan Based on All Hazards Risk Assessment	10.4%
E0013	Development of EP Policies and Procedures	8.9%
E0030	Names and Contact Information	8.9%
E0025	Arrangement with Other Facilities	7.9%
E0007	EP Program Patient Population	7.0%

REGIONAL

Tag #	Description (25 Surveys)	% Survey s Cited
E0004	Develop EP Plan, Review and Update Annually	56.00%
E0039	EP Testing Requirements	44.00%
E0037	EP Training Program	16.00%
E0030	Names and Contact Information	12.00%
E0015	Subsistence Needs for Staff and Patients	12.00%
E0025	Arrangement with Other Facilities	8.00%
E0009	Local, State, Tribal Collaboration Process	8.00%
E0006	Plan Based on All Hazards Risk Assessment	8.00%
E0024	Policies/Procedures- Volunteers and Staffing	8.00%
E0029	Development of Communication Plan	4.00%

WYOMING

Tag #	Description (3 Surveys)	% Survey s Cited
E0039	EP Testing Requirements	33.30%
E0009	Local, State, Tribal Collaboration Process	33.30%
E0024	Policies/Procedures- Volunteers and Staffing	33.30%

2006 vs. 2012 Life Safety Code

Commit to your health.

- Means of Egress – Locking of Doors
 - Per the 2006 Life Safety Code
 - (18.2.2.2.4) Doors within a required means of egress shall not be equipped with a latch or lock that requires the use of a tool or key from the egress side, unless otherwise permitted by the following:
 - *Door-locking arrangements without delayed egress shall be permitted in health care occupancies, or portions of health care occupancies, where the clinical needs of the patients require specialized security measures for their safety, provided that staff can readily unlock such doors at all times. (See 18.1.1.1.5 and 18.2.2.2.5.)
 - Unlike delayed-egress locks, there is no restriction on the number of doors in the means of egress that can be locked where the clinical needs of the patients so require.
 - *Delayed-egress locks complying with 7.2.1.6.1 shall be permitted, provided that not more than one such device is located in any egress path.
 - Access-controlled egress doors complying with 7.2.1.6.2 shall be permitted.

2006 vs. 2012 Life Safety Code

Commit to your health.

- Means of Egress – Locking of Doors (Cont).
 - Per the 2006 Life Safety Code
 - (18.2.2.2.5) Doors that are located in the means of egress and are permitted to be locked under other provisions of this chapter shall have provisions made for the rapid removal of occupants by means such as the following:
 - Remote control of locks
 - Keying of all locks to keys carried by staff at all times
 - Other such reliable means available to the staff at all times

2006 vs. 2012 Life Safety Code

Commit to your health.

- Means of Egress – Locking of Doors (Cont).
 - Per the 2012 Life Safety Code
 - (18.2.2.2.4) Doors within a required means of egress shall not be equipped with a latch or lock that requires the use of a tool or key from the egress side, unless otherwise permitted by one of the following:
 - Locks complying with 18.2.2.2.5 shall be permitted.
 - *Delayed-egress locks complying with 7.2.1.6.1 shall be permitted.
 - *Access-controlled egress doors complying with 7.2.1.6.2 shall be permitted.
 - Elevator lobby exit access door locking in accordance
 - with 7.2.1.6.3 shall be permitted.
 - (18.2.2.2.5) Door-locking arrangements shall be permitted in accordance with either 18.2.2.2.5.1 or 18.2.2.2.5.2.

2006 vs. 2012 Life Safety Code

Commit to your health.

- Means of Egress – Locking of Doors (Cont).
 - Per the 2012 Life Safety Code
 - (18.2.2.2.5.1) * Door-locking arrangements shall be permitted where the clinical needs of patients require specialized security measures or where patients pose a security threat, provided that staff can readily unlock doors at all times in accordance with 18.2.2.2.6.
 - Psychiatric units, Alzheimer units, and dementia units are examples of areas with patients who might have clinical needs that justify door locking. Forensic units and detention units are examples of areas with patients who might pose a security threat. **Where Alzheimer or dementia patients in nursing homes are not housed in specialized units, the provisions of 18.2.2.2.5.1 should not apply.** (See 18.2.2.2.5.2.)

2006 vs. 2012 Life Safety Code

Commit to your health.

- **Means of Egress – Locking of Doors (Cont).**
 - **Per the 2012 Life Safety Code**
 - (18.2.2.2.5.2)* Door-locking arrangements shall be permitted where patient special needs require specialized protective measures for their safety, provided that all of the following criteria are met:
 - Staff can readily unlock doors at all times in accordance with 18.2.2.2.6.
 - A total (complete) smoke detection system is provided throughout the locked space in accordance with 9.6.2.9, or locked doors can be remotely unlocked at an approved, constantly attended location within the locked space.
 - The building is protected throughout by an approved, supervised automatic sprinkler system in accordance with 18.3.5.1.
 - The locks are electrical locks that fail safely so as to release upon loss of power to the device.
 - The locks release by independent activation of each of the following:
 - Activation of the smoke detection system required by 18.2.2.2.5.2(2)
 - Water flow in the automatic sprinkler system required by 18.2.2.2.5.2(3)

2006 vs. 2012 Life Safety Code

Commit to your health.

- Means of Egress – Locking of Doors (Cont).
 - Per the 2012 Life Safety Code
 - (18.2.2.2.5.2)* Door-locking arrangements shall be permitted where patient special needs require specialized protective measures for their safety, provided that...
 - Pediatric units, maternity units, and emergency departments are examples of areas where patients might have special needs that justify door locking.

2006 vs. 2012 Life Safety Code

Commit to your health.

- Means of Egress – Locking of Doors (Cont).
 - Summary
 - The verbiage of Sections 18.2.2.4 and 18.2.2.5 differ significantly in the 2006 vs 2012 Life Safety Code.
 - The appendix language, along with interpretation provided by the CMS RO, provide the door locking arrangements that are permissible under the newly adopted 2012 Life Safety Code, and facilities are expected to be in compliance during their next annual survey.



Wyoming Department of Health Healthcare Licensing and Surveys

- **Amending the Chapter 3 Construction Rules**
- **ALF/Boarding Home and SNF/NF Life Safety Code Training**



NURSING HOMES

TOP 10 CITED HEALTH DEFICIENCIES

Standard and Complaint Surveys

FFY2024

WYOMING		
97 Surveys		
Tag	Description	%
F0600	Free from Abuse and Neglect	23.7%
F0880	Infection Prevention & Control	18.6%
F0812	Food Procurement, Store/Prepare/Serve Sanitary	16.5%
F0656	Develop/Implement Comprehensive Care Plan	11.3%
F0684	Quality of Care	11.3%
F0758	Free from Unnec Psychotropic Meds/PRN Use	10.3%
F0761	Label/Store Drugs and Biologicals	10.3%
F0677	ADL Care Provided for Dependent Residents	7.2%
F0689	Free of Accident Hazards/Supervision/Devices	6.2%
F0883	Influenza and Pneumococcal Immunizations	6.2%

REGION		
1,213 Surveys		
Tag	Description	%
F0880	Infection Prevention & Control	23.6%
F0689	Free of Accident Hazards/Supervision/Devices	21.1%
F0812	Food Procurement, Store/Prepare/Serve Sanitary	17.3%
F0600	Free from Abuse and Neglect	13.7%
F0761	Label/Store Drugs and Biologicals	13.3%
F0684	Quality of Care	10.9%
F0657	Care Plan Timing and Revision	9.2%
F0658	Services Provided Meet Professional Standards	9.2%
F0677	ADL Care Provided for Dependent Residents	8.3%
F0609	Reporting of Alleged Violations	8.1%

NATION		
70,053 Surveys		
Tag	Description	%
F0880	Infection Prevention & Control	9.5%
F0689	Free of Accident Hazards/Supervision/Devices	9.4%
F0812	Food Procurement, Store/Prepare/Serve Sanitary	7.9%
F0684	Quality of Care	6.8%
F0656	Develop/Implement Comprehensive Care Plan	6.0%
F0761	Label/Store Drugs and Biologicals	5.3%
F0677	ADL Care Provided for Dependent Residents	4.4%
F0609	Reporting of Alleged Violations	3.9%
F0600	Free from Abuse and Neglect	3.9%
F0695	Respiratory/Tracheostomy Care and Suctioning	3.8%



NURSING HOMES

TOP 10 CITED HEALTH DEFICIENCIES

Standard and Complaint Surveys

FFY2025 YTD

WYOMING		
31 Surveys		
Tag	Description	%
F0880	Infection Prevention & Control	32.3%
F0600	Free from Abuse and Neglect	22.6%
F0758	Free from Unnec Psychotropic Meds/PRN Use	22.6%
F0609	Reporting of Alleged Violations	22.6%
F0725	Sufficient Nursing Staff	19.4%
F0679	Activities Meet Interest/Needs Each Resident	9.7%
F0656	Develop/Implement Comprehensive Care Plan	9.7%
F0689	Free of Accident Hazards/Supervision/Devices	9.7%
F0801	Qualified Dietary Staff	9.7%
F0684	Quality of Care	9.7%

REGION		
621 Surveys		
Tag	Description	%
F0880	Infection Prevention & Control	20.1%
F0600	Free from Abuse and Neglect	17.9%
F0689	Free of Accident Hazards/Supervision/Devices	17.6%
F0812	Food Procurement, Store/Prepare/Serve Sanitary	11.0%
F0609	Reporting of Alleged Violations	10.5%
F0684	Quality of Care	9.0%
F0657	Care Plan Timing and Revision	6.8%
F0658	Services Provided Meet Professional Standards	6.6%
F0761	Label/Store Drugs and Biologicals	6.0%
F0550	Resident Rights/Exercise of Rights	5.6%

NATION		
33,142 Surveys		
Tag	Description	%
F0880	Infection Prevention & Control	10.7%
F0689	Free of Accident Hazards/Supervision/Devices	8.8%
F0812	Food Procurement, Store/Prepare/Serve Sanitary	7.7%
F0684	Quality of Care	7.0%
F0656	Develop/Implement Comprehensive Care Plan	5.7%
F0761	Label/Store Drugs and Biologicals	5.6%
F0600	Free from Abuse and Neglect	4.0%
F0755	Pharmacy Srvcs/Procedures/Pharmacist/Records	4.0%
F0695	Respiratory/Tracheostomy Care and Suctioning	3.9%
F0677	ADL Care Provided for Dependent Residents	3.8%

Complaint Data

ASSISTED LIVING FACILITY							
	FFY19	FFY20	FFY21	FFY22	FFY23	FFY24	FFY25 YTD
TOTAL #	23	33	24	38	40	78	32
SUBSTANTIATED	5	11	8	24	15	30	6
	21.7%	33.3%	33.3%	63.2%	41.7%	46.2%	24.0%
UNSUBSTANTIATED	18	22	16	14	21	35	19
	78.3%	66.7%	66.7%	36.8%	58.3%	53.8%	76.0%
# PENDING	0	0	0	0	4	13	7

Complaint Data

NURSING HOMES							
	FFY19	FFY20	FFY21	FFY22	FFY23	FFY24	FFY25 YTD
TOTAL #	159	132	111	121	151	227	169
SUBSTANTIATED	60	37	32	39	55	83	52
	37.7%	28.0%	28.8%	32.2%	36.4%	36.7%	40.9%
UNSUBSTANTIATED	99	95	79	82	96	143	75
	62.3%	72.0%	71.2%	67.8%	63.6%	63.3%	59.0%
# PENDING	0	0	0	0	0	1	42



Complaint Data

NURSING HOMES			
FILED BY:	FFY23	FFY24	FFY25 YTD
Resident	8	13	8
Staff/Current & Former	20	35	13
Anonymous	11	15	29
Family	62	57	42
Friend	4	6	5
Other Agencies	17	20	15
Incidents	29	81	57
TOTAL	151	227	169



NURSING HOME STANDARD SURVEYS AVERAGE # OF HEALTH DEFICIENCIES

FFY	WYOMING	REGION	NATION
2018	7.74	6.49	6.57
2019	7.31	6.65	6.90
2020	6.25	6.22	6.38
2021	4.65	6.30	6.15
2022	5.51	6.34	6.94
2023	5.42	6.02	7.24
2024	4.70	6.70	7.80
2025 YTD	4.60	6.80	7.60



AVERAGE FULL SURVEY FREQUENCY

YEAR	NURSING HOME (MONTHS)
FFY20	11.91
FFY21	21.52
FFY22	15.49
FFY23	12.13
FFY24	13.19
FFY25 YTD	14.47



Wyoming Department of Health Healthcare Licensing and Surveys

- Nurse Aide Training and Testing
- New CMS Regulations Effective 4/28/25
- Incident Database and Reporting
- Users for ePOC and Incident Database
- Past Non-compliance



NURSING HOME INFORMAL DISPUTE RESOLUTION

FEDERAL FISCAL YEAR	# SURVEYS REQUESTED	# OF TAGS	NO CHANGES	MODIFICATIONS	REMOVED
2018	3	3	0	2	1 (33%)
2019	15	23	7	7	9 (39%)
2020	2	3	1	2	0 (0%)
2021	6	12	3	5	4 (33%)
2022	11	22	7	4	11 (50%)
2023	10	17	7	2	8 (47%)
2024	6	12	6	2	4 (33%)
2025 YTD	4	6	2	1	3 (50%)
TOTAL	57	98	33	25	40 (41%)



Wyoming Department of Health Healthcare Licensing and Surveys

CMP Project Information:

<https://health.wyo.gov/aging/hls/civil-money-penalty-reinvestment-funds/>



Wyoming Department of Health
Healthcare Licensing and Surveys

THANK YOU!

