

SUMMARY SHEET
BOARD OF HEALTH AND ENVIRONMENTAL CONTROL
November 13, 2014

_____ ACTION/DECISION

 X INFORMATION

- I. TITLE: Administrative Orders, Consent Orders, and Sanction Letters issued by HEALTH REGULATION (HR).
- II. SUBJECT: Sanctions completed during the period September 1, 2014, through September 30, 2014.
- III. FACTS: For the period of September 1, 2014, through September 30, 2014, Health Regulation is reporting two (2) Consent Orders and five (5) Administrative Orders with a total penalty of \$48,500.

Program	Consent Orders	Administrative Orders	Amount
Health Licensing	2	5	\$48,500

- IV. ANALYSIS: As submitted by the Bureau of Health Facilities Licensing:

Nason Medical Center-James Island, 319 Folly Road, James Island, S.C., 29412. By Administrative Order, executed on May 27, 2014, the Department assessed a monetary penalty against Nason Medical Center-James Island ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency

department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.

Previous Sanctions: None.

Nason Medical Center-Summerville, 4278 Ladson Road, Ladson, S.C., 29456. By Administrative Order, executed on May 28, 2014, the Department assessed a monetary penalty against Nason Medical Center-Summerville ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.

Previous Sanctions: None

Nason Medical Center-Mt. Pleasant, 1101 Bowman Road, Mt Pleasant, S.C., 29464-3213. By Administrative Order, executed on May 27, 2014, the Department assessed a monetary penalty against Nason Medical Center-Mt. Pleasant ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements

and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.

Previous Sanctions: None.

Nason Medical Center-N. Charleston (Rivers Avenue), 5133 Rivers Ave, North Charleston, S.C., 29045. By Administrative Order, executed on May 27, 2014, the Department assessed a monetary penalty against Nason Medical Center-N. Charleston (Rivers Avenue) ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital

services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.

Previous Sanctions: None.

Nason Medical Center-N. Charleston (University Blvd.), 8901 University Blvd, North Charleston, S.C., 29406. By Administrative Order, executed on May 27, 2014, the Department assessed a monetary penalty against Nason Medical Center-N. Charleston (University Blvd.) ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.

Previous Sanctions: None.

Riley's Residential Care Home, 2327 Brian Christopher Road, Great Falls, S.C. 29055-8844. By Consent Order (CO-HL-11-2014), executed on September 11, 2014, the Department imposed a \$20,000 monetary penalty. A term of the Consent Order required Riley's Residential Care Home ("Riley's") to make payment of \$6,000 of the assessed monetary penalty in twelve monthly installments of \$500. The remaining \$14,000 of the assessed monetary penalty was stayed upon a 12-month period of substantial compliance with Regulation 61-84 and the Consent Order, as determined by the Department. Additionally, the Consent Order required Riley's to: initiate action to correct the violations that initiated the enforcement action; ensure that all violations of Regulation 61-84 are not repeated; and schedule and attend a compliance assistance meeting with representatives of the Department's Bureau of Health Facilities Licensing within 45 days of execution of the Consent Order.

Previous Sanctions: None.

Longwood Plantation, 1687 Longwood Drive, Orangeburg, S. C. 29118-2307. By Consent Order (CO-HL-13-2014), executed on September 16, 2014, the Department imposed a \$3,500 monetary penalty. A term of the Consent Order required Longwood Plantation ("Longwood") to make payment of \$700 of the assessed monetary penalty within 30 days of execution of this Consent Order. The remaining \$2,800 of the assessed monetary penalty was stayed upon a 9-month period of substantial compliance with Regulation 61-84 and the Consent Order, as determined by the Department. Additionally, the Consent Order required Longwood to: initiate action to correct the violations that initiated the enforcement action; ensure that all violations of Regulation 61-84 are not repeated; and schedule and attend a compliance assistance meeting with representatives of the Department's Bureau of Health Facilities Licensing within 45 days of execution of the Consent Order.

Previous Sanctions: None.

Approved By: _____


Jamie Shuster
Director of Public Health

HEALTH REGULATION

Bureau of Health Facilities Licensing

Sanctions Imposed for the Period from September 1, 2014 – September 30, 2014

1. **Facility:** Nason Medical Center-James Island
- Street address: 319 Folly Road, James Island, SC 29412
- Mail address: 319 Folly Road, James Island, SC 29412
- Type:** Unlicensed Freestanding Emergency Service
- Sanction Imposed:** By Administrative Order, executed on May 27, 2014, the Department assessed a monetary penalty against Nason Medical Center-James Island ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.
- Reason for Sanction:** The sanction was imposed against Nason based on its violation of S.C. Code Ann. § 44-7-130(25) (Supp. 2013) by using terminology on the signage of the exterior of its building, on its business cards, and on its internet websites implying that Nason is providing emergency hospital services.
- Previous Sanctions:** No other sanction has been initiated against this facility in the past three years.

HEALTH REGULATION

Bureau of Health Facilities Licensing

Sanctions Imposed for the Period from September 1, 2014 – September 30, 2014

2. **Facility:** Nason Medical Center-Summerville
- Street address: 4278 Ladson Road, Ladson, SC 29456
- Mail address: 4278 Ladson Road, Ladson, SC 29456
- Type:** Unlicensed Freestanding Emergency Service
- Sanction Imposed:** By Administrative Order, executed on May 28, 2014, the Department assessed a monetary penalty against Nason Medical Center-Summerville ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.
- Reason for Sanction:** The sanction was imposed against Nason based on its violation of S.C. Code Ann. § 44-7-130(25) (Supp. 2013) by using terminology on the signage of the exterior of its building, on its business cards, and on its internet websites implying that Nason is providing emergency hospital services.
- Previous Sanctions:** No other sanction has been initiated against this facility in the past three years.

HEALTH REGULATION

Bureau of Health Facilities Licensing

Sanctions Imposed for the Period from September 1, 2014 – September 30, 2014

3. **Facility:** Nason Medical Center-Mt. Pleasant
- Street address: 1101 Bowman Road, Mt Pleasant, SC 29464-3213
- Mail address: 1101 Bowman Road, Mt Pleasant, SC 29464-3213
- Type:** Unlicensed Freestanding Emergency Service
- Sanction Imposed:** By Administrative Order, executed on May 27, 2014, the Department assessed a monetary penalty against Nason Medical Center-Mt. Pleasant ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.
- Reason for Sanction:** The sanction was imposed against Nason based on its violation of S.C. Code Ann. § 44-7-130(25) (Supp. 2013) by using terminology on the signage of the exterior of its building, on its business cards, and on its internet websites implying that Nason is providing emergency hospital services.
- Previous Sanctions:** No other sanction has been initiated against this facility in the past three years.

HEALTH REGULATION

Bureau of Health Facilities Licensing

Sanctions Imposed for the Period from September 1, 2014 – September 30, 2014

4. **Facility:** Nason Medical Center-N. Charleston (Rivers Avenue)
- Street address: 5133 Rivers Ave, North Charleston, SC 29045
- Mail address: 5133 Rivers Ave, North Charleston, SC 29045
- Type:** Unlicensed Freestanding Emergency Service
- Sanction Imposed:** By Administrative Order, executed on May 27, 2014, the Department assessed a monetary penalty against Nason Medical Center-N. Charleston (Rivers Avenue) ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.
- Reason for Sanction:** The sanction was imposed against Nason based on its violation of S.C. Code Ann. § 44-7-130(25) (Supp. 2013) by using terminology on the signage of the exterior of its building, on its business cards, and on its internet websites implying that Nason is providing emergency hospital services.
- Previous Sanctions:** No other sanction has been initiated against this facility in the past three years.

HEALTH REGULATION

Bureau of Health Facilities Licensing

Sanctions Imposed for the Period from September 1, 2014 – September 30, 2014

5. **Facility:** Nason Medical Center-N Charleston (University Blvd.)
- Street address: 8901 University Blvd, North Charleston, SC 29406
- Mail address: 8901 University Blvd, North Charleston, SC 29406
- Type:** Unlicensed Freestanding Emergency Service
- Sanction Imposed:** By Administrative Order, executed on May 27, 2014, the Department assessed a monetary penalty against Nason Medical Center-N. Charleston (University Blvd.) ("Nason") in the amount of \$5,000. The Administrative Order also required Nason to cease and desist from using terminology, signs and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. By letter, dated June 20, 2014, the Department suspended the Administrative Order and suspended the final date to submit a Request a Final Review (RFR) by the Department's Board pending the Administrative Order's suspension. On July 11, 2014, the Department met with representatives of Nason resulting in a Consent Order, executed on September 11, 2014. The Consent Order required Nason to make payment of a \$1,000 monetary penalty to the Department within 30 days of execution of the Consent Order. Additionally, Nason was required to cease and desist from using terminology, signs, and symbols in advertisements and signage that imply that it offers emergency medical care or emergency hospital services, or otherwise provides the services of a freestanding emergency service operated as an extension of an existing emergency department of a licensed hospital. This included removal of and cessation of the future use of the terms "EMERGENCY," "EMERGENCY CARE," "EMERGENCY URGENT CARE," and "EMERGENCY MEDICINE" used on all signage posted on the Facility's buildings and/or properties, business cards, brochures and internet websites.
- Reason for Sanction:** The sanction was imposed against Nason based on its violation of S.C. Code Ann. § 44-7-130(25) (Supp. 2013) by using terminology on the signage of the exterior of its building, on its business cards, and on its internet websites implying that Nason is providing emergency hospital services.
- Previous Sanctions:** No other sanction has been initiated against this facility in the past three years.

HEALTH REGULATION

Bureau of Health Facilities Licensing

Sanctions Imposed for the Period from September 1, 2014 – September 30, 2014

6. **Facility:** Riley's Residential Care Home
Street address: 2327 Brian Christopher Road, Great Falls, SC 29055-8844
Mail address: 2327 Brian Christopher Road, Great Falls, SC 29055-8844
- Type:** Community Residential Care Facility
- Sanction Imposed:** By Consent Order (CO-HL-11-2014), executed on September 11, 2014, the Department imposed a \$20,000 monetary penalty. A term of the Consent Order required Riley's Residential Care Home ("Riley's") to make payment of \$6,000 of the assessed monetary penalty in twelve monthly installments of \$500. The remaining \$14,000 of the assessed monetary penalty was stayed upon a 12-month period of substantial compliance with Regulation 61-84 and the Consent Order, as determined by the Department. Additionally, the Consent Order required Riley's to: initiate action to correct the violations that initiated the enforcement action; ensure that all violations of Regulation 61-84 are not repeated; and schedule and attend a compliance assistance meeting with representatives of the Department's Bureau of Health Facilities Licensing within 45 days of execution of the Consent Order.
- Reason for Sanction:** The sanction was imposed against Riley's was due to violations and repeat violations of 7 S.C. Code Ann. Regs. 61-84, *Standards for Licensing Community Residential Care Facilities*. Violations consisted of: (§ 504.A) failing to ensure documentation of training was signed by the individual providing the training and by the staff member receiving the training; (§ 701.B.2) failing to ensure physician orders prescribing residents' medications, their diets, and home health services were available for review; (§ 701.B.10) failing to ensure resident records contained dated photographs of the residents; (§ 703.A) failing to date a resident's ICP, by failing to review and revise residents' ICPs every six months, or as necessary, and by failing to ensure residents' ICPs were signed by the resident or their responsible party; (§ 1303) failing to ensure the surfaces of food-contact and non-food-contact equipment and utensils were cleaned and sanitized after each use, by failing to ensure wiping cloths were stored in an approved sanitary solution, by failing to store food-contact utensils and single-service items in a manner to protect them from contamination, and by failing to store cleaned and sanitized utensils in a manner to allow for proper air drying; (§ 1310) failing to ensure garbage and refuse was stored in covered containers and in such a manner that it is not accessible by insects and rodents; (§ 1601.A) failing to maintain the structure and its component parts/equipment in good working condition; (§ 1703) failing to ensure the Facility and its grounds were kept free of vermin and offensive odors; (§ 1703.A.1) failing to maintain each specific area of the Facility in a clean condition; (§ 2704.D) failing to ensure a sanitary individualized method for drying hands was provided in bathrooms utilized by residents; (§ 2704.L) failing to ensure toilet tissue was provided in bathrooms utilized by residents; (§ 2704.M) and, by failing to ensure that waste receptacles in bathrooms utilized by women residents were covered.
- Previous Sanctions:** No other sanction has been initiated against this facility in the past three years.

HEALTH REGULATION

Bureau of Health Facilities Licensing

Sanctions Imposed for the Period from September 1, 2014 – September 30, 2014

7. **Facility:** Longwood Plantation
- Street address: 1687 Longwood Drive, Orangeburg, S. C. 29118-2307
- Mail address: 1687 Longwood Drive, Orangeburg, S. C. 29118-2307
- Type:** Community Residential Care Facility
- Sanction Imposed:** By Consent Order (CO-HL-13-2014), executed on September 16, 2014, the Department imposed a \$3,500 monetary penalty. A term of the Consent Order required Longwood Plantation ("Longwood") to make payment of \$700 of the assessed monetary penalty within 30 days of execution of this Consent Order. The remaining \$2,800 of the assessed monetary penalty was stayed upon a 9-month period of substantial compliance with Regulation 61-84 and the Consent Order, as determined by the Department. Additionally, the Consent Order required Longwood to: initiate action to correct the violations that initiated the enforcement action; ensure that all violations of Regulation 61-84 are not repeated; and schedule and attend a compliance assistance meeting with representatives of the Department's Bureau of Health Facilities Licensing within 45 days of execution of the Consent Order.
- Reason for Sanction:** The sanction was imposed against Longwood was due to violations and repeat violations of 7 S.C. Code Ann. Regs. 61-84, *Standards for Licensing Community Residential Care Facilities*. Violations consisted of: (§ 703.A) failing to develop a residents' ICP within 7 days of admission, by failing to ensure residents' ICPs were signed by the resident or their responsible party, and by failing to revise a resident's ICP as changes in the resident's needs occurred; (§ 801.B) retaining a resident who became dependent in all ADLs and was no longer appropriate for placement in a CRCF; (§ 801.C.5.k) and, retaining a resident who required the skills of a licensed nurse for more than 14 consecutive days and, thus, was no longer appropriate for placement in a CRCF.
- Previous Sanctions:** No other sanction has been initiated against this facility in the past three years.