



**pennsylvania**  
DEPARTMENT OF HUMAN SERVICES

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**MAILING DATE: SEP 12 2016**

Mr. David Barnes, Authorized Agent  
Watermark Operator, LLC  
2020 Rudasil Road  
Tucson, Arizona 85704

RE: Rose Tree Place  
500 Sandy Bank Road  
Media, Pennsylvania 19063  
License #: 132810

Dear Mr. Barnes:

As a result of the Department of Human Services' licensing inspection on June 29, 2016 of the above facility, the violations with 55 Pa.Code Ch. 2600 (relating to Personal Care Homes) specified on the enclosed License Inspection Summary were found.

All violations specified on the enclosed License Inspection Summary must be corrected by the dates specified on the License Inspection Summary and continued compliance with 55 Pa.Code Ch. 2600 must be maintained.

Sincerely,



Patricia Adams  
Human Services Licensing Supervisor

Enclosure  
Licensing Inspection Summary

**VIOLATION REPORT  
PERSONAL CARE HOMES - 55 Pa.Code Chapter 2600**

PCH Name: ROSE TREE PLACE		License Number: 13281
Address: 500 SANDY BANK ROAD, MEDIA, PA 19063		County: Delaware
Administrator: Cynthia Evans		Region: SOUTHEAST
Legal Entity Name: WATERMARK OPERATOR LLC		
Legal Entity Address: 2020 WEST RUDASILL ROAD, TUCSON, AZ 85704		
Certificate(s) of Occupancy		
<b>Staffing Hours</b>		
Resident Support:	Total Daily Staff: 215	Waking Staff: 161
Type of Inspection: Partial	BHA Docket Number:	Notice: Unannounced
Reason(s) for Inspection(s) Complaint		
On-Site Inspections Dates and Department Representatives On-Site 06/29/2016: Adams, Patricia 06/30/2016: Adams, Patricia		
Off-Site Inspection Dates and Inspectors, if Applicable 06/27/2016: Adams, Patricia; Colon, Lisette		
<b>Other Details</b>		
Partial or Full Triggers:		Random Indicators:
<b>Resident Demographic Data as of Inspection Dates</b>		
Licensed Capacity: 149 Number of Residents Served: 131 Secured Dementia Care Unit In Home: Yes Area: Secured Dementia Unit Capacity, if Applicable: 26 Number of Residents Served in Secured Dementia Care Unit, if applicable: 20 Number of Current Hospice Residents: 9 Number of Hospice Residents in past year: 19		Number of Residents who: Receive Supplemental Security Income: 0 Are 60 Years of Age or Older: 130 Have Mental Illness: 3 Have an Intellectual Disability: 0 Have a Mobility Need: 84 Have a Physical Disability: 1

*Cynthia Evans / Executive Director*

Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
 PCH Name: ROSE TREE PLACE

1. REGULATION 55 Pa.Code §2600  
 2600.42(c) - A resident shall be treated with dignity and respect.

2a. DESCRIPTION OF VIOLATION

Residents #1 and #2 were confined to their room from 6/25/16 to 6/29/16. They were banished to a motel by the home, while their room was treated for bed bugs, ostracized by staff; treated as if contagious, i.e. food sent to room on disposable products and left outside the door and blamed for bringing in bed bugs. In addition, they were not included in the decision making process on how best to deal with the situation.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)  
 Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

Please see attached POC

Repeat Violation: No	Date(s) of Previous Violation(s):		
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Signature of Legal Entity Representative  
 (Required on EVERY Page) *Cindy Evans*

Printed Name and Title of Legal Entity Representative (Required on EVERY Page) <i>Cindy Evans/Executive Director</i>	Date <i>8/19/16</i>
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DEPARTMENT USE ONLY - HOMES MAY NOT WRITE BELOW THIS LINE!

The above plan of correction is approved as of 8/30/16  
 (Date)

Plan of correction implementation status as of 8/30/16  
 (Date)

The above plan of correction was approved by *[Signature]*  
 (Initials)

- Fully Implemented
- Partially Implemented - Adequate Progress
- Partially Implemented - Inadequate Progress
- Not Implemented

Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
PCH Name: ROSE TREE PLACE

1. REGULATION 55 Pa.Code §2600

2600.42(c) - A resident shall be treated with dignity and respect.

2a. DESCRIPTION OF VIOLATION

Residents #1 and #2 were confined to their room from 6/25/16 to 6/29/16. They were banished to a motel by the home, while their room was treated for bed bugs, ostracized by staff; treated as if contagious, i.e. food sent to room on disposable products and left outside the door and blamed for bringing in bed bugs. In addition, they were not included in the decision making process on how best to deal with the situation.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

**What was the root cause of the problem?** Bed bugs were discovered in resident's apartment. Due to the fact there were no available furnished apartments within the community, residents were relocated to a local motel while the resident's apartment was professionally treated for bed bugs.

**What was done to immediately correct the violation?** Local Ombudsman was contacted and sensitivity /Resident Rights in-service was scheduled for July 12, 2016. July 6<sup>th</sup>, met with the son, resident #1 and #2 to discuss how the situation was handled and what we could have done better looking back.

**What will be done to ensure the violation does not reoccur?** Sensitivity/Resident Rights in-service was received from local Ombudsman Denise Gallagher on July 12, 2016 (Attachment 1.)

Dining Services received in-services on Sensitivity/Resident Rights to ensure residents are treated with dignity and respect. Dining Services was in-serviced on proper tray service and will deliver all meals on China and directly to the resident's in their apartment.

Maintenance and Housekeeping also received in-services on "how to inspect for bed bugs" and a review of Watermark's policy on Housekeeping/Maintenance Bed Bugs Infestation, Attachment 2, Attachment 3, and Attachment 4.

In the future if a similar situation occurs the community will include the resident and residents family in the decision making process on how best to proceed and to communicate openly with all parties involved. Furthermore, if no furnished apartments are available within the community to transfer the resident to, the community will contact surrounding Watermark communities, to inquire availability of furnished apartment to move the resident to.

**Who will be responsible for monitoring compliance?** Executive Director / Director of Nursing /  
Maintenance Director

*Ginny Evans / Executive Director*

Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
 PCH Name: ROSE TREE PLACE

1. REGULATION 55 Pa.Code §2600  
 2600.42(p) - A resident shall be free from restraints.

2a. DESCRIPTION OF VIOLATION  
 Residents #1 and #2 were confined to their room from 6/25/16 until 6/29/16, by the home, because bed bugs were observed after treatment of their room. All meals, normally served on china were served on disposable products; taken to their room and left outside the door. Staff did not enter the room and contact with the residents was limited.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)  
*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

See attached POC

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Signature of Legal Entity Representative  
 (Required on EVERY Page) *Cindy Evans*

Printed Name and Title of Legal Entity Representative (Required on EVERY Page) <i>Cindy Evans Executive Director</i>	Date <i>8/19/16</i>
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Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
PGH Name: ROSE TREE PLACE

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1. REGULATION 55 Pa.Code §2600  
2600.42(p) - A resident shall be free from restraints.

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2a. DESCRIPTION OF VIOLATION

Residents #1 and #2 were confined to their room from 6/25/16 until 6/29/16, by the home, because bed bugs were observed after treatment of their room. All meals, normally served on china were served on disposable products; taken to their room and left outside the door. Staff did not enter the room and contact with the residents was limited.

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3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

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**What was the root cause of the problem?** After the apartment was exterminated professionally by Ehrlich, additional bed bugs were found in the apartment. To prevent any further infestation, residents were asked to remain in their apartment until further inspection and additional treatment could be performed.

**What was done to immediately correct the violation?** Sensitivity/Resident Rights in-service was scheduled with the local Ombudsman, Denise Gallagher for July 12, 2016. In-services were conducted with Housekeeping, Maintenance and Dining Services.

**What will be done to ensure the violation does not reoccur?** Associates received Sensitivity/Resident Rights in-services from local Ombudsman [REDACTED] on July 12, 2016, (Attachment 1.) Maintenance and Housekeeping received in-services on "how to inspect for bed bugs" and a review of Watermark's policy on Housekeeping/Maintenance Bed Bugs Infestation, Attachment 2, Attachment 3, and Attachment 4.

Dining Services received in-services on Sensitivity/Resident Rights to ensure residents are treated with dignity and respect. Dining Services was in-serviced on proper tray service and will deliver all meals on China, directly to the resident's in their apartment.

**Who will be responsible for monitoring compliance?** Executive Director / Director of Nursing / Maintenance Director

*Quincy Evans Executive Director*

Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
 PCH Name: ROSE TREE PLACE

1. REGULATION 55 Pa.Code §2600

2600.181(c) - A resident who desires to self-administer medications shall be assessed by a physician, physician's assistant or certified registered nurse practitioner regarding the ability to self-administer and the need for medication reminders.

2a. DESCRIPTION OF VIOLATION

The home temporarily lodged residents #1 and #2 at a local motel, from 6/17/16 to 6/21/16, during an eradication treatment of their room. Resident #1 self-administered 6/18/16 to 6/22/16 and administered resident #2's medications. Neither residents can self-administer.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

See Attached POC

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Signature of Legal Entity Representative  
 (Required on EVERY Page) *Cindy Evans*

Printed Name and Title of Legal Entity Representative (Required on EVERY Page) <i>Cindy Evans / Executive Director</i>	Date <i>8/19/16</i>
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Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
PCH Name: ROSE TREE PLACE

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**1. REGULATION 88 Pa. Code §2600**

2600.181(c) - A resident who desires to self-administer medications shall be assessed by a physician, physician's assistant or certified registered nurse practitioner regarding the ability to self-administer and the need for medication reminders.

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**2a. DESCRIPTION OF VIOLATION**

The home temporarily lodged residents #1 and #2 at a local motel, from 6/17/16 to 6/21/16, during an eradication treatment of their room. Resident #1 self-administered 6/18/16 to 6/22/16 and administered resident #2's medications. Neither residents can self-administer.

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**3. PLAN OF CORRECTION (POC)** (Attach pages as necessary. Remember that you must sign and date any attached pages.)

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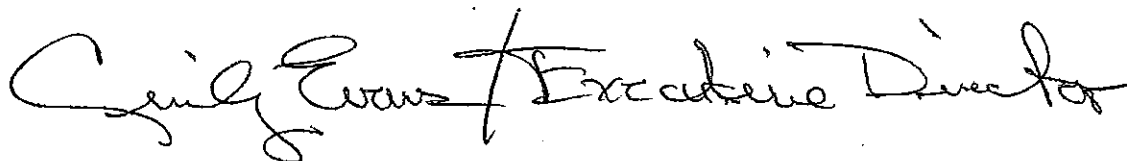
**What was the root cause of the problem?** Neither Resident #1 nor #2 are able to self-administer their medications. While at temporary lodging the agency we arranged to provide care and distribute medications were not able to administer the medications. As a result resident #1 administered [REDACTED] own medications as well as administering resident #2's medications.

**What was done to immediately correct the violation?** Reviewed Leave of Absence policy for medication and regulation 181c with shift supervisors, management team and direct care staff. Also reviewed RASP and DME with shift supervisors, management team and direct care staff and where to locate in the chart. Explained that the DME needs to be followed as documented by physician. Reviewed violation itself and discussed where and what went wrong in order to make sure associates and managers understand the meaning of the regulation. See Attachment 5 pages 1 thru 12.

**What will be done to ensure the violation does not reoccur?** The Director of Nursing, Assistant Director of Nursing and or designee will continue to conduct routine in-services on Medication Administration, Leave of Absence Medications, RASP's and DME's. Community will coordinate medication management for residents unable to self-administer medications in emergent and any other situation that may arise.

Community will continue to utilize the self-med assessment for residents who wish to self-administer and whose physicians have given such order.

**Who will be responsible for monitoring compliance?** Director of Nursing /Assistant Director of Nursing /Executive Director

  
Cindy Evans / Executive Director

Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
 PCH Name: ROSE TREE PLACE

**1. REGULATION 55 Pa.Code §2600**

2600.182(a) - A home may provide medication administration services for a resident who is assessed to need medication administration services in accordance with § 2600.181 (relating to self-administration) and for a resident who chooses not to self-administer medications. If a home does not provide medication administration services, the resident shall be referred to an appropriate assessment agency.

**2a. DESCRIPTION OF VIOLATION**

- Resident #1 cannot self-administer medications and takes medication including Crestor 5mg, Amlodipine 10mg and Alprazolam 0.25mg PRN. The home did not provide medication administration services from 6/18/16 to 6/22/16 while temporarily lodged at a local motel.

- Resident #2 cannot self-administer medications and takes medication including Bisoprolol Fum 5mg, Tamsulosin 0.4mg, Prednisone 20mg and Oxycod/APAP 5-325mg PRN. The home did not provide medication administration services from 6/18/16 to 6/22/16 while temporarily lodged at a local motel.

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

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See Attached POC

Repeat Violation: No

Date(s) of Previous Violation(s):

Signature of Legal Entity Representative  
 (Required on EVERY Page)

*Candy Evans*

Printed Name and Title of Legal Entity Representative  
 (Required on EVERY Page)

*Candy Evans / Executive Director*

Date

*8/19/16*

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Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
PCH Name: ROSE TREE PLACE

**1. REGULATION 55 Pa.Code §2600**

2600.182(a) - A home may provide medication administration services for a resident who is assessed to need medication administration services in accordance with § 2600.181 (relating to self-administration) and for a resident who chooses not to self-administer medications. If a home does not provide medication administration services, the resident shall be referred to an appropriate assessment agency.

**2a. DESCRIPTION OF VIOLATION**

- Resident #1 cannot self-administer medications and takes medication including Crestor 5mg, Amlodipine 10mg and Alprazolam 0.26mg PRN. The home did not provide medication administration services from 6/18/16 to 6/22/16 while temporarily lodged at a local motel.

- Resident #2 cannot self-administer medications and takes medication including Bisoprolol Fum 5mg, Tamsulosin 0.4mg, Prednisone 20mg and Oxycod/APAP 6-325mg PRN. The home did not provide medication administration services from 6/18/16 to 6/22/16 while temporarily lodged at a local motel.

**3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)**

*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

**What was the root cause of the problem?** Neither Resident #1 nor #2 are able to self-administer their medications. While at temporary lodging the agency we arranged to provide care was not able to administer their medications. As a result resident #1 administered [redacted] own medications as well as administering resident #2's medications.

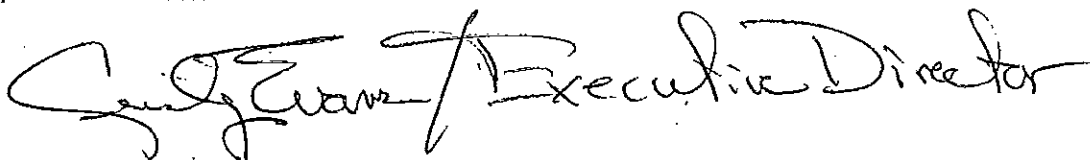
**What was done to immediately correct the violation?** In-services were conducted with nurses and med-techs on Medication Administration, Take Out Medications and regulation 182(a). If a resident is on Rose Tree Place medication program, Rose Tree Place is to administer all medications, not the resident. In-services were held with shift supervisors, management team and direct care staff on how to review resident's RASP and DME and where to locate in the residents chart. Explained that the DME needs to be followed as documented by physician. See Attachment 5 Pages 1 thru 12 and Attachment 6 Pages 1 thru 3.

**What will be done to ensure the violation does not reoccur?** The Director of Nursing, Assistant Director of Nursing and or designee will continue to conduct routine in-services on Medication Administration and Leave of Absence Medications.

If a resident is on a leave of absence from the community or when it is necessary to transfer a resident to another Watermark Community, Rose Tree Place will contact the resident's pharmacy and request the appropriate medications be packaged for the resident on a leave of absence or transferred to another Watermark Community.

It is not the policy of Rose Tree Place to transfer residents outside of a Watermark Community therefore in the future Rose Tree Place will find accommodations for a resident within the community itself or arrange to transfer the resident to another Watermark community.

**Who will be responsible for monitoring compliance?** Director of Nursing /Assistant Director of Nursing/Executive Director

  
Executive Director

Violation Report: 13281 - 06/27/2016 - Adams, Patricia  
 PCH Name: ROSE TREE PLACE

1. REGULATION 55 Pa.Code §2600  
 2600.183(a)(1) - Prescription medications, OTC medications and CAM shall be kept in their original labeled containers and may not be removed more than 2 hours in advance of the scheduled administration.

2a. DESCRIPTION OF VIOLATION  
 On 6/17/16, residents #1 and #2's medications were repackaged and placed in daily pill boxes. The medications were scheduled for administration from 6/17/16 to 6/22/16 while the residents were temporarily lodged at a local motel by the home.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)  
 Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

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Signature of Legal Entity Representative  
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Printed Name and Title of Legal Entity Representative (Required on EVERY Page)	Date
Cindy Evans, Executive Director	

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- Fully Implemented
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Violation Report: 13281 - 08/27/2016 - Adams, Patricia  
PCH Name: ROSE TREE PLACE

**1. REGULATION 55 Pa.Code §2600**

2600.183(a)(1) - Prescription medications, OTC medications and CAM shall be kept in their original labeled containers and may not be removed more than 2 hours in advance of the scheduled administration.

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On 8/17/16, residents #1 and #2's medications were repackaged and placed in daily pill boxes. The medications were scheduled for administration from 8/17/16 to 8/22/16 while the residents were temporarily lodged at a local motel by the home.

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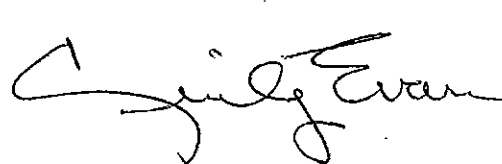
*Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.*

**What was the root cause of the problem?** Residents medications were removed from their original packaging while temporarily relocated.

**What was done to immediately correct the violation?** In-services were held with nurses and med-techs on Leave of Absence Medications, Take Out Medications and Regulation 183(a)(1). Attachment 5, pages 1 thru 12, Attachment 6, pages 1 thru 3 and Attachment 7.

**What will be done to ensure the violation does not reoccur?** The Director of Nursing, Assistant Director of Nursing and or designee will continue to conduct routine in-services on Leave of Absence Medications, Take Out Medications.

**Who will be responsible for monitoring compliance?** Director of Nursing /Assistant Director of Nursing/Executive Director

 Julie Evans / Executive Director