



pennsylvania
DEPARTMENT OF HUMAN SERVICES

SEP 1 2 2017

Mr. Steven T. Cherry,
Executive Director
The New Heritage Towers, Inc.
200 Veterans Lane
Doylestown, Pennsylvania 18901

RE: Heritage Towers
License #: 127180

Dear Mr. Cherry:


As a result of the Department of Human Services' annual licensing inspection on May 2, 2017 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.

In an effort to improve our licensing processes, the Bureau of Human Services Licensing is soliciting feedback about your recent human services licensing inspection experience. To participate in the online provider survey, launch your web browser and go to https://www.surveymonkey.com/r/BHSL_Inspection.

The survey is brief and will only take about 5 minutes to complete. Your participation in the survey is completely voluntary and all of your responses will be kept confidential. The responses will be reviewed as part of an aggregate of provider inspection responses. Thank you in advance for providing feedback.

Sincerely,


Jacqueline L. Rowe
Director

Enclosure
License Inspection Summary

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

PCH Name: HERITAGE TOWERS		License Number: 12718
Address: 200 VETERANS LANE, DOYLESTOWN, PA 18901		County: Bucks
Administrator: MARTINE MINNINGER		Region: SOUTHEAST
Legal Entity Name: THE NEW HERITAGE TOWERS INC		
Legal Entity Address: 200 VETERANS LANE, DOYLESTOWN, PA 18901		
Certificate(s) of Occupancy C-2 LP 06/08/2001 PA Dept of Labor & Industry		
Staffing Hours		
Resident Support:	Total Daily Staff: 73	Working Staff: 55
Type of Inspection: Full	BHA Docket Number:	Notice: Unannounced
Reason(s) for Inspection(s)		
Renewal		
On-Site Inspections Dates and Department Representatives On-Site		
05/02/2017; Braswell, Natasha; Gray, Dean		
Off-Site Inspection Dates and Inspectors, if Applicable		
Other Details		
Partial or Full Triggers:		Random Indicators:
Resident Demographic Data as of Inspection Dates		
Licensed Capacity: 75 Number of Residents Served: 69 Secured Dementia Care Unit in Home: No Area: Secured Dementia Unit Capacity, if Applicable: Number of Residents Served in Secured Dementia Care Unit, if applicable: Number of Current Hospice Residents: 2 Number of Hospice Residents in past year: 8	Number of Residents who: Receive Supplemental Security Income: 0 Are 60 Years of Age or Older: 69 Have Mental Illness: 0 Have an Intellectual Disability: 0 Have a Mobility Need: 4 Have a Physical Disability: 2	

Violation Report: 12718 - 05/02/2017 - Braswell, Natasha
 PCH Name: HERITAGE TOWERS

1. REGULATION 55 Pa.Code §2600
 2600.18 - A home shall comply with applicable Federal, State and local laws, ordinances and regulations.

2a. DESCRIPTION OF VIOLATION
 The home does not have carbon monoxide detectors inside the boiler room.

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.


It is the utmost priority for Heritage Towers to ensure compliance with all regulatory agencies and promote the highest quality of care to our residents.

Carbon Monoxide detectors have been installed throughout the building according regulatory requirements. Policy and procedure developed for response if CO detector alarms and staff training is scheduled for 7/26/17 which is the next all staff meeting.

Compliance will be monitored by the Director of facility operations.

Please see attachment #1

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

Printed Name and Title of Legal Entity Representative
 (Required on EVERY Page) *Martine Minninger, PCHA* Date *6/23/17*

DEPARTMENT USE ONLY - HOMES MAY NOT WRITE BELOW THIS LINE!

The above plan of correction is approved as of *6/24/17*
 (Date)

Plan of correction implementation status as of *6/24/17*
 (Date)

The above plan of correction was approved by 
 (Initials)

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

Violation Report: 12718 - 05/02/2017 - Braswell, Natasha
 PCH Name: HERITAGE TOWERS

1. REGULATION 55 Pa.Code §2600
 2600.23(a) - A home shall provide each resident with assistance with activities of daily living as indicated in the resident's assessment and support plan.

2a. DESCRIPTION OF VIOLATION
 The assessment and support plan for resident # 1 indicates that the resident requires assistance with supervision outside the home. On 1-9-17, the resident did not receive this assistance while in the community.

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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Resident #1's support plan states "Family or PC staff will accompany resident in unfamiliar settings", resident was on premises but outside in a familiar setting.

Going forward, PC staff will ensure resident is accompanied when outside the building. PC administrator will monitor compliance and audit charts monthly to ensure accurate documentation in RASPs and that support plans are being followed.

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

Printed Name and Title of Legal Entity Representative
 (Required on EVERY Page) *Martine Minninger PCHA* Date *6/23/17*

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The above plan of correction is approved as of <u>6/24/17</u> (Date)	Plan of correction implementation status as of <u>6/24/17</u> (Date)
The above plan of correction was approved by <u>PM</u> (Initials)	<input type="checkbox"/> Fully Implemented <input checked="" type="checkbox"/> Partially Implemented - Adequate Progress <input type="checkbox"/> Partially Implemented - Inadequate Progress <input type="checkbox"/> Not Implemented

Violation Report: 12718 - 05/02/2017 - Braswell, Natasha
 PCH Name: HERITAGE TOWERS

1. REGULATION 55 Pa.Code §2600
 2600.51 - Criminal history checks and hiring policies shall be in accordance with the Older Adult Protective Services Act (OAPSA) (35 P.S. §§ 10225.101-10225.5102) and 6 Pa.Code Chapter 15 (relating to protective services for older adults).

2a. DESCRIPTION OF VIOLATION
 The home did not have the criminal background check with the State Police seal for staff person A as required.

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.

It is the utmost priority for Heritage Towers to ensure compliance with all regulatory agencies and promote the highest quality of care to our residents.

It is the policy of Heritage Towers/WEL to conduct a Federal Background on all employees who have not lived in the state of PA for a minimum of 2 years. This employee lived in PA for less than 2 years at time of hire and a Federal Check was done in place of the state background check.

We conducted a state check to maintain compliance (see attached) in an effort to maintain compliance with DHS regulations.

Going forward, Heritage Towers will conduct both a Federal and a State background check on all PC employees who have not lived in the state for 2 or more years.

Please See Attachment #2

Repeat Violation: No	Date(s) of Previous Violation(s):		
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Printed Name and Title of Legal Entity Representative
 (Required on EVERY Page) *Martine Minninger PCHA* Date *6/23/17*

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 (Initials)

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Violation Report: 12718 - 05/02/2017 - Braswell, Natasha
 PCH Name: HERITAGE TOWERS

1. REGULATION 55 Pa.Code §2600

2600.60(c) - Additional staff hours, or contractual hours, shall be provided as necessary to meet the laundry, food service, housekeeping, and maintenance needs of the home.

2a. DESCRIPTION OF VIOLATION

According to the resident council minutes, the ancillary department staff are not able to complete housekeeping tasks and especially environmental emergencies on the weekends.

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.

It is the utmost priority for Heritage Towers to ensure compliance with all regulatory agencies and promote the highest quality of care to our residents.

Personal care housekeeping coverage is as follows:

- Apartment cleaning staff is Monday through Friday 730am – 4pm; One housekeeper is assigned to each floor.
- One housekeeper is assigned 7 days a week for common area cleaning from 730am-4pm
- One housekeeper is assigned 7 days a week for common areas and on-call apartment emergencies from 4pm-830pm
- One Custodian is assigned Monday through Friday from 6:30am – 3pm for project work, floor and carpet cleaning, along with as needed floor cleaning in apartments
- One Custodian is assigned for any cleaning as needed/call in emergencies from 10pm -6:30 am Monday through Saturday

As noted in the schedule above, there is housekeeping staff available daily. The work order hotline number is available to every resident, and PC staff carry radios and are to call housekeeping anytime an emergency cleaning is needed.

Going forward, the housekeeping manager has instituted radio checks to ensure housekeeping staff has radios on and are responding in a timely manner.

The housekeeping manager is to ensure compliance daily.

The administrator is responsible for apartment compliance

Repeat Violation: No

Date(s) of Previous Violation(s):

Signature of Legal Entity Representative
 (Required on EVERY Page)

[Handwritten Signature]

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

Martine Minninger PCHA

Date *6/23/17*

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 (Initials)

Violation Report: 12718 - 05/02/2017 - Braswell, Natasha
 PCH Name: HERITAGE TOWERS

1. REGULATION 55 Pa.Code §2600

2600.91 - Telephone numbers for the nearest hospital, police department, fire department, ambulance, poison control, local emergency management and personal care home complaint hotline shall be posted on or by each telephone with an outside line.

2a. DESCRIPTION OF VIOLATION

The telephone located in in room numbers 229 and 306 did not have emergency service numbers posted near the phone.

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.

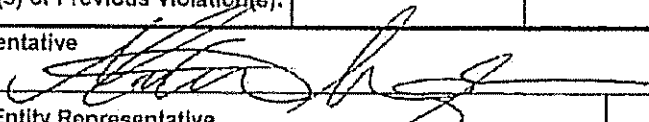
It is the utmost priority for Heritage Towers to ensure compliance with all regulatory agencies and promote the highest quality of care to our residents.

Both of these residents reside in a 1 bedroom apartment and have phones in both the living room and bedroom. They had emergency numbers posted near one phone but did not have them posted on the other.

At time of inspection the numbers were posted immediately


To ensure compliance the Personal Care Administrative assistant will conduct quarterly room checks

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Violation Report: 12718 - 05/02/2017 - Braswell, Natasha
 PCH Name: HERITAGE TOWERS

1. REGULATION 55 Pa.Code §2600
 2600.103(f) - Food requiring refrigeration shall be stored at or below 40°F. Frozen food shall be kept at or below 0°F. Thermometers are required in refrigerators and freezers.

2a. DESCRIPTION OF VIOLATION
 On 5-2-17, at 9:45 am, there was no thermometer in the refrigerator, located on the 2nd floor activity area.

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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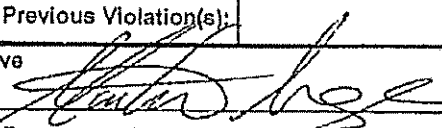
The refrigerator located on the 2nd floor was turned on but no longer used since the activity area was moved to the 3rd floor.

After the inspection, the refrigerator was removed from the building.

Repeat Violation: No

Date(s) of Previous Violation(s):

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Printed Name and Title of Legal Entity Representative
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Marhrie Minninger PCHA

Date 6/23/17

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Violation Report: 12718 - 05/02/2017 - Braswell, Natasha
 PCH Name: HERITAGE TOWERS

1. REGULATION 55 Pa.Code §2600
 2600.187(d) - The home shall follow the directions of the prescriber.

2a. DESCRIPTION OF VIOLATION
 Resident #3 is prescribed Ensure vanilla but was administered Ensure chocolate.

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.

It is the utmost priority for Heritage Towers to ensure compliance with all regulatory agencies and promote the highest quality of care to our residents.

The order stating Vanilla Ensure was changed so as to not specify flavor to allow for resident choice or preference.

Going forward, supplemental drink orders will not state flavors so residents can have freedom of choice.


Compliance will be monitored through quarterly cart audits conducted by the contracted pharmacy.

Repeat Violation: No	Date(s) of Previous Violation(s):		
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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) <i>Martine Munninger PCHA</i>	Date <i>6/23/17</i>
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Violation Report: 12718 - 05/02/2017 - Braswell, Natasha
 PCH Name: HERITAGE TOWERS

1. REGULATION 55 Pa.Code §2600

2600.225(a) - A resident shall have a written initial assessment that is documented on the Department's assessment form within 15 days of admission. The administrator or designee, or a human service agency may complete the initial assessment.

2a. DESCRIPTION OF VIOLATION

The initial assessment for resident # 2 admitted on [redacted] 16, was finalized on [redacted] 16, three days past the 15 day grace period.

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

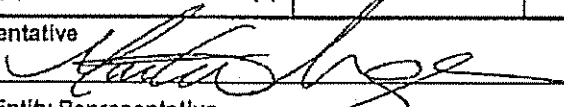
Include steps to correct the violation described above and steps to prevent a similar violation from occurring again. If steps cannot be completed immediately, include dates by which the steps will be completed.

It is the utmost priority for Heritage Towers to ensure compliance with all regulatory agencies and promote the highest quality of care to our residents.

Staff have been re-educated in regards to timeliness of RASPs

To ensure compliance, PC Administrative assistant tracks RASP due dates and PC administrator will complete monthly chart audits

Repeat Violation: No	Date(s) of Previous Violation(s):		
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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) <i>Martine Minninger PCHA</i>	Date <i>6/23/17</i>
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