



pennsylvania
DEPARTMENT OF HUMAN SERVICES

SEP 07 2017

Ms. Joanne Leskowicz,
Assistant Corporate Secretary
CCRC-Brandywine LLC
6737 West Washington Street, Suite 2003
Milwaukee, Wisconsin 53214

RE: The Gardens at Freedom Village
25 Freedom Boulevard
West Brandywine, Pennsylvania 19320
License #: 126000

Dear Ms. Leskowicz:

As a result of the Department of Human Services' annual licensing inspections on May 3, 2017 and May 4, 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,

A handwritten signature in black ink that reads 'J. Rowe'.

Jacqueline L. Rowe
Director

Enclosure
License Inspection Summary

JUN. 13. 2017 11:51AM

Violation Report: 12600 - 06/03/2017 - Kazlmer, Lauren
 PCH Name: THE GARDENS AT FREEDOM VILLAGE

1. REGULATION 65 Pa.Code §2600

2600.65(b) - Within 40 scheduled working hours, direct care staff persons, ancillary staff persons, substitute personnel and volunteers shall have an orientation that includes the following:

- (1) Resident rights.
- (2) Emergency medical plan.
- (3) Mandatory reporting of abuse and neglect under the Older Adult Protective Services Act (35 P.S. §§ 10225.101-10225.5102).
- (4) Reporting of reportable incidents and conditions.

2a. DESCRIPTION OF VIOLATION

Staff person A, hired on [redacted] 2016, did not receive Resident Rights training within 40 hours of starting work.

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.

The following is the Plan of Correction for The Gardens at Freedom Village regarding the Statement of Deficiencies dated 5/3/17. This Plan of Correction is not to be construed as an admission of or agreement with the findings and conclusions in the Statement of Deficiencies, or any related sanction or fine. Rather, it is submitted as confirmation of our ongoing efforts to comply with statutory and regulatory requirements. In this document, we have outlined specific actions in response to identified issues. We have not provided a detailed response to each allegation or finding, nor have we identified mitigating factors. We remain committed to the delivery of quality health care services and will continue to make changes and improvement to satisfy that objective.

Staff Person A is no longer an active employee. If and when Staff Person A returns, Staff Person A will receive resident rights. (see attachment A)

New Hire Training Plan updated so staff receive Resident Rights; Emergency Medical Plan; Mandatory Reporting of Abuse; and Report of Reportable Incidents. (see attachment B)

Human Resources or Designee will complete audit on all new hires for 3 months to insure compliance with regulation.

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) Nathaniel Stubbs, PCHA Date 6/14/17

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

The above plan of correction is approved as of 6/19/17 (Date)

Plan of correction implementation status as of 6/19/17 (Date)

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

The above plan of correction was approved by  (Initials)

Violation Report: 12600 - 05/03/2017 - Kazimer, Lauren
 PCH Name: THE GARDENS AT FREEDOM VILLAGE

1. REGULATION 65 Pa.Code §2800

2600.65(f) - Training topics for the annual training for direct care staff persons shall include the following:

- (1) Medication self-administration training.
- (2) Instruction on meeting the needs of the residents as described in the preadmission screening form, assessment tool, medical evaluation and support plan.
- (3) Care for residents with dementia and cognitive impairments.
- (4) Infection control and general principles of cleanliness and hygiene and areas associated with immobility, such as prevention of decubitus ulcers, incontinence, malnutrition and dehydration.
- (5) Personal care service needs of the resident.
- (6) Safe management techniques.
- (7) Care for residents with mental illness or mental retardation, or both, if the population is served in the home.

2a. DESCRIPTION OF VIOLATION

- Staff person B's 2016 annual training did not include the following topics: Resident Rights/OAPSA, Medication Self-Administration, and Meeting the Needs of the Residents Based on the Department's Forms.

- Staff person C's 2016 annual training did not include the following topics: Medication Self-Administration, Meeting the Needs of the Residents Based on the Department's Forms, Personal Care Needs of the Residents, and Safe Management Techniques.

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

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Staff Person B received training for Resident Rights/OAPSA, Medication Self-Administration, and Meeting the Needs of the Residents Based on the Department's Forms. (see attachment C)

Staff Person C received training for Medication Self-Administration, Meeting the Needs of the Residents Based on the Department's Forms, Personal Care Needs of the Residents, and Safe Management Techniques. (see attachment D)

Annual Training Plan updated so staff receive Resident Rights/OAPSA, Medication Self-Administration, Meeting the Needs of the Residents Based on the Department's Forms, Personal Care Needs of the Residents, and Safe Management Techniques. (see attachment E)

Human Resources or Designee will monitor new hires for compliance with regulation for next 3 months.

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

Printed Name and Title of Legal Entity Representative Nathaniel Stube, PCHA
 (Required on EVERY Page) Date 6/14/17

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JUN. 13. 2017 11:51AM

Violation Report: 12600 - 05/03/2017 - Kazimer, Lauren
 PCH Name: THE GARDENS AT FREEDOM VILLAGE

1. REGULATION 55 Pa.Code §2600

2600.65(g) - Direct care staff persons, ancillary staff persons, substitute personnel and regularly scheduled volunteers shall be trained annually in the following areas:

- (1) Fire safety completed by a fire safety expert or by a staff person trained by a fire safety expert.
- (2) Emergency preparedness procedures and recognition and response to crises and emergency situations.
- (3) Resident rights.
- (4) The Older Adult Protective Services Act (35 P. S. §§ 10226.101-10226.5102).
- (5) Falls and accident prevention.
- (6) New population groups that are being served at the home that were not previously served, if applicable.

2a. DESCRIPTION OF VIOLATION

Ancillary staff person C did not receive training in Fire Safety, Resident Rights/OAPSA, and Falls and Accident Prevention during training year 2016.

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

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Staff Person C received training for Fire Safety, Resident Rights/OAPSA, and Falls and Accident Prevention (see attachment D)

Annual Training Plan updated so staff receive Resident Rights/OAPSA, Medication Self-Administration, Meeting the Needs of the Residents Based on the Department's Forms, Personal Care Needs of the Residents, and Safe Management Techniques. (see attachment E)

Human Resources or Designee will monitor new hires for compliance with regulation for next 3 months.

Repeat Violation: No

Date(s) of Previous Violation(s):

Signature of Legal Entity Representative
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[Signature]

Printed Name and Title of Legal Entity Representative
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Nathaniel Stube, PCHA

Date 6/14/17

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JUN. 13. 2017 11:52AM

Violation Report: 12600 - 05/03/2017 - Kazimer, Lauren
 PCH Name: THE GARDENS AT FREEDOM VILLAGE

1. REGULATION 65 Pa.Code §2600
 2600.89(b) - Hot water temperature in areas accessible to the resident may not exceed 120°F.

2a. DESCRIPTION OF VIOLATION

On 5/4/17, at approximately 10:30am, the water temperature at the bathroom sink in room #350 measured 128.6 degrees Fahrenheit.

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

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Director of Maintenance adjusted water temperature valve to insure compliance with regulation on May 4, 2017. A digital thermometer was added at the mixing valve to alert staff if water temperatures exceed 120F.

Water Temperatures are taken weekly in The Gardens by maintenance technician or designee. No additional abnormal water temperatures taken. (see attachment F)

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JUN. 13. 2017 11:52AM

Violation Report: 12600 - 05/03/2017 - Kezimer, Lauren
 PCH Name: THE GARDENS AT FREEDOM VILLAGE

1. REGULATION 65 Pa.Code §2800

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

There were no emergency service numbers posted near the telephone in room #143.

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

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Emergency Numbers were placed on phone while surveyor was still in room #1143.

Audit completed of all resident rooms to insure emergency services numbers are posted near telephones. All other rooms in compliance. (see attachment G)

Administrator or designee will verify emergency numbers are present with all new admissions for 3 months.

Repeat Violation: No

Date(s) of Previous Violation(s):

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NS

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Nathaniel Stube, PCHA

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Violation Report: 12600 - 06/03/2017 - Kazimer, Lauren
 PCH Name: THE GARDENS AT FREEDOM VILLAGE

1. REGULATION 55 Pa.Code §2600

2600.132(d) - Residents shall be able to evacuate the entire building to a public thoroughfare, or to a fire-safe area designated in writing within the past year by a fire safety expert within the period of time specified in writing within the past year by a fire safety expert.

2a. DESCRIPTION OF VIOLATION

The home's designated fire drill evacuation time is 13 minutes. According to the home's fire drill log, the drill conducted on 4/3/17 took 14 minutes, 8 seconds.

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

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Fire safety and fire drill procedures reviewed with all staff. (see attachment H)

Fire Safety Expert will provide on-going fire safety training during monthly fire drills.

Repeat Violation: No

Date(s) of Previous Violation(s):

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NCS

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JUN. 13. 2017 11:53AM

Violation Report: 12600 - 05/03/2017 - Kazimer, Lauren
 PCH Name: THE GARDENS AT FREEDOM VILLAGE

1. REGULATION 65 Pa.Code §2600

2600.132(h) - Residents shall evacuate to a designated meeting place away from the building or within the fire-safe area during each fire drill.

2a. DESCRIPTION OF VIOLATION

According to the home's fire drill log, a resident refused to evacuate during the drill conducted on 12/13/16.

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

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At the time the resident refused education was provided to the resident. (see attachment I)

Fire Drill Policy reviewed at resident council meeting held 6/1/17. (see attachment J)

Administrator or designee will review policy as part of residency agreement for all new admissions.

Repeat Violation: No	Date(s) of Previous Violation(s):		
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Signature of Legal Entity Representative *NCS*
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Printed Name and Title of Legal Entity Representative
 (Required on EVERY Page) Nathaniel Stube, PCHA Date 6/14/17

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JUN. 13. 2017 11:53AM

Violation Report: 12600 - 05/03/2017 - Kazlmar, Lauren
 PCH Name: THE GARDENS AT FREEDOM VILLAGE

- 1. REGULATION 55 Pa.Code §2600**
 2600.187(a) - A medication record shall be kept to include the following for each resident for whom medications are administered:
- (1) Resident's name.
 - (2) Drug allergies.
 - (3) Name of medication.
 - (4) Strength.
 - (5) Dosage form.
 - (6) Dose.
 - (7) Route of administration.
 - (8) Frequency of administration.
 - (9) Administration times.
 - (10) Duration of therapy, if applicable.
 - (11) Special precautions, if applicable.
 - (12) Diagnosis or purpose for the medication, including pro re nata (PRN).
 - (13) Date and time of medication administration.
 - (14) Name and initials of the staff person administering the medication.

2a. DESCRIPTION OF VIOLATION

- Resident #1's order for Levothyroxine changed from 75mcg to 125mcg. On 5/3/17, the medication administration record for resident #1's Levothyroxine did not reflect the new dosage.
- Resident #1's order for Oxycodone HCL changed from 5mg to 10mg on 3/15/17. The controlled medication count sheet did not reflect the new dosage.

3. PLAN OF CORRECTION (POC) (Attach pages as necessary. Remember that you must sign and date any attached pages.)
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Resident # 1 medication Levothyroxine and Oxycodone HCL new dose corrected in MAR

Audit of Medication records completed all other medications in compliance with regulation. (see attachment K)

Health and Wellness Directed or designee will conduct random weekly audits of med records for 3 months - to ensure medications records are correct.

Repeat Violation: No	Date(s) of Previous Violation(s):		
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Signature of Legal Entity Representative *NCS*
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Printed Name and Title of Legal Entity Representative (Required on EVERY Page) Nathaniel Stube, PCHA	Date 6/14/17
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The above plan of correction was approved by <i>NS</i> (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