



pennsylvania
DEPARTMENT OF HUMAN SERVICES

APR 22 2019

Ms. Holly Schade
Senior VP Home & Health Services
ACTS Retirement – Life Communities, Inc.
375 Morris Road
West Point, Pennsylvania 19486

RE: Oakbridge Terrace at Brittany Pointe Estates
1001 South Valley Forge Road
Lansdale, Pennsylvania 19446
License #: 138930

Dear Ms. Schade:

As a result of the Department's Bureau of Human Services Licensing annual inspection on March 1, 2019 of the above facility, the violations with 55 pa. Code Ch. 2800 (relating to Assisted Living Residence) specified on the enclosed violation report were found.

All citations specified on the enclosed violation report must be corrected by the dates specified on the violation report and continued compliance with 55 pa. Code Ch. 2800 (relating to Assisted Living Residence) 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, appearing to read 'J. Rowe'.

Jacqueline L. Rowe
Director

Enclosure
Violation Report

LICENSING INSPECTION SUMMARY
Assisted Living Residences – 55 Pa.Code § 2800

ALR Name: Oakbridge Terrace at Brittany Pointe Estates	License Number: 138930
Address: 1001 S. Valley Forge Road Lansdale, Pennsylvania 19446	County: Montgomery
Administrator: Jackie Barger	
Legal Entity Name: ACTS Retirement Life Communities, Inc.	
Legal Entity Address: 375 Morris Road West Point, Pennsylvania 19486	
Certificate(s) of Occupancy: A2 Department of Labor and Industry 03/24/2000	
Type of Inspection: Full	
Reason(s) for inspection(s): Renewal	
On-Site Inspections Dates and Department Representatives On-Site: March 1, 2019 David Carrion	
Off-Site Inspection Dates and Inspectors, if Applicable: N/A	
Resident Demographic Data as of Inspection Dates	
Licensed Capacity: 41 ✓ Number of Residents Served: 36 ✓ Secured Dementia Care Unit In Home: N/A Area: N/A Secured Unit Capacity, if Applicable Number of Residents Served In Secured Dementia Care Unit, if applicable: N/A ✓ Number of Current Hospice Residents: 0 ✓ Number of Hospice Residents in past year: 1 ✓	Number of Residents who: N/A Receive Supplemental Security Income: N/A ✓ Are 60 Years of Age or Older: 36- Have Mental Illness: 0 ✓ Have an Intellectual Disability: 0 - Have a Mobility Need: 0 ✓ Have a Physical Disability: 0 ✓

LICENSING INSPECTION SUMMARY
Assisted Living Residences – 55 Pa.Code § 2800

<p>Regulation 2800.171(b)(4) - Whenever staff persons or volunteers of the residence provide transportation for the residents, at least one staff member transporting or accompanying the residents shall have completed the initial new hire direct care staff person training as specified in § 2800.65 (relating to staff orientation and direct care staff person training and orientation).</p>
<p>Violation Per resident and administrator interviews, residents are transported to doctor's appointments by the drivers of the facility, who have not completed the new hire direct care staff person training, nor have any staff person who accompanied residents on the trips.</p>
<p>Plan of Correction</p> <p>Immediately following the DHS inspection on February 28, 2019-March 1, 2019 the lead driver for Brittany Pointe Estates was instructed to have all drivers servicing OakBridge Terrace at Brittany Pointe Estates complete the DHS Direct Care Staff Training Course and Competency. As of March 18, 2019, all drivers servicing OakBridge Terrace at Brittany Pointe Estates have completed the course and competency. Certificates are attached.</p> <p>To ensure continued compliance, a new training plan is being developed for all new hire PA drivers servicing OakBridge Terrace at Brittany Pointe Estates. The new hire training plan will be automatically assigned with a same day due date on the date of hire. All new PA drivers will be required to complete the DHS Direct Care Staff Training Course and Competency on their date of hire. The lead driver for Brittany Pointe Estates will ensure completion and the Director of Assisted Living will monitor compliance by reviewing the course completion report for each new hire. Maintain audits for Department review for a period of three years 4/8/19 <i>my</i></p> <p>Please find attached:</p> <ol style="list-style-type: none"> 1. Certificates of completion for all drivers servicing OakBridge Terrace at Brittany Pointe Estates (a-d) 2. Training Course Request Form requesting Relias Requirements Tracker for DHS Direct Care Staff Training Course and Competency-Staff will have the ability to upload their certificate of completion from course and competency completed on DHS website.

Printed Name and Title of Legal Entity Representative (Required on all pages) <i>Jacqueline Barger</i>	
Signature of Legal Entity Representative (Required on all pages) <i>Jacqueline Barger</i>	Date <i>4/4/19</i>
DEPARTMENT USE ONLY – NAMES MAY NOT WRITE BELOW THIS LINE!	
The above plan of correction is approved as of <u>4/8/19</u> (Date)	Plan of correction implementation status as of <u>4/8/19</u> (Date)
The above plan of correction was approved by <i>my</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

RECOMMENDATION FOR CERTIFICATE OF COMPLIANCE (RENEWALS ONLY)

R=φ

[Handwritten mark]

INSTRUCTIONS: Regional Program Office completes form, makes two copies, keeps one copy and forwards the original and one copy to the Licensing Office. (This form is to be used for RENEWALS ONLY.)

146 003 0001

REGION SOUTHEAST		COUNTY MONTGOMERY	
NAME AND ADDRESS OF AGENCY/FACILITY OAKBRIDGE TERRACE AT BRITTANY POINTE ESTATES		FACILITY E-MAIL JBARGER@ACTSLIFE.ORG	
1001 VALLEY FORGE ROAD			
LANDSDALE 19446			
MAILING ADDRESS OF FACILITY 1001 VALLEY FORGE ROAD		LEGAL E-MAIL JNEELY@ACTSLIFE.ORG	
LANDSDALE PA 19446		TELEPHONE NO. 215-855-4109	
NAME OF LEGAL ENTITY ACTS RETIREMENT-LIFE COMMUNITIES INC		FEIN/USCN	
CURRENT CERTIFICATE NUMBER 138930 ✓	TYPE OF CONTROL <input type="checkbox"/> PUBLIC <input checked="" type="checkbox"/> PRIVATE		
EFFECTIVE DATE FROM 07/01/2018 TO 07/01/2019	IF PRIVATE <input type="checkbox"/> PROFIT <input checked="" type="checkbox"/> NON-PROFIT		

RECEIVED

APR 09 2019

Human Services Licensing

TYPE OF FACILITY & TYPE OF SERVICE PROVIDED	
ASSISTED LIVING ASSISTED LIVING Sdu = N/A - Hospice = φ - Hospice past yr = 1 - SSI = φ - WOT = 36 - ME = φ - ID = φ -	MN = φ - PD = φ -
DATE(S) OF INSPECTION	3/1/2019

RECOMMENDATIONS			
<input checked="" type="checkbox"/> CERTIFICATE RECOMMENDED	TYPE <input checked="" type="checkbox"/> REGULAR <input type="checkbox"/> PROVISIONAL	IF PROVISIONAL <input type="checkbox"/> FIRST <input type="checkbox"/> SECOND <input type="checkbox"/> THIRD <input type="checkbox"/> FOURTH	
		SCORE	PERIOD FROM _____ TO _____
<input type="checkbox"/> CERTIFICATE NOT RECOMMENDED	REASON <input type="checkbox"/> DENIAL <input type="checkbox"/> NON-RENEWAL <input type="checkbox"/> REVOCATION <input type="checkbox"/> VOLUNTARY CLOSURE <input type="checkbox"/> OTHER		
LIST REGULATION CHAPTER 2800		FIRE SAFETY APPROVAL <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
		DATE 3/24/2000	TYPE A2
		LICENSED CAPACITY 41 ✓	CURRENT CENSUS 36 ✓

RECEIVED

APR 10 2019

Mia Johnson
SIGNATURE - PERSON MAKING RECOMMENDATION

Human Services Licensing

Fire Drill Report

Community: Brittany Pointe Estates Day/Date/Shift: Tuesday / 3-6-18 / 1st

Exact Location of Drill: Oakbridge Terrace Location of "Mock Fire": Room 101

Method & Location of System Activated: SMOKE DETECTOR ROOM 101

Time Fire Alarm Pulled: 14:26:50 Time Drill Completed: 14:31:56

Person Initiating the Drill: R.S. [Signature] Report completed by: R.S. [Signature]

1. Did fire alarm sound? Yes No
2. Were residents/employees evacuated from the immediate fire area? Yes No
3. Were hallways & exit doors cleared of all equipment? Yes No
If No, describe: _____
4. Were all doors closed & fire doors on magnets closed by automatic door closure system? Yes No
If No, describe: _____
5. Were the medical records removed? Yes N/A No
6. Was fire safety equipment functioning properly? Yes No
7. Were the Exit doors that are locked by the Code-Alert/WanderGuard system properly released? Yes N/A No
If No, describe & list corrective measures: _____
8. Were these same locked exit doors properly reset and manually checked to assure the system was reset and the doors secured? Yes N/A No
If No, describe & list corrective measures: _____

Number of Residents present in the residence: 33 + 1 GUEST

Number of staff participating in fire drill: 10
(Attached or place signatures on reverse of this form)

Number of residents evacuated during fire drill: 33 + 1 GUEST

Number of residents sheltered in place: 0

Overall rating of fire drill performance: Very Good Satisfactory Poor
If Poor, explain: _____

Corrective actions taken: _____

Signature, Administrator: Janice Barger Date: 3/10/18

David D. Harris, FPE Atlantic Code Consultants



Atlantic Code Consultants

4530 William Penn Highway No. 4350; Murrysville, PA 15668-2002

Tel: 412-860-8709 ★ E-mail: HHicks@ACCFirePro.com

Fire Protection Engineers ❖ Building Code Consultants ❖ Life Safety Professionals

March 19, 2018

Mr. Frank Virgili
Corporate Director-Maintenance Operations
ACTS Retirement-Life Communities, Inc.
375 Morris Road
West Point, PA 19486

RE: DBHSL Fire Safety Certification 2018
OakBridge Terrace Assisted Living Residence at Brittany Pointe Estates

Dear Frank:

In accordance with the requirements of the Department of Human Services (DHS) for the Commonwealth of Pennsylvania, we recently conducted the annual fire safety survey of the OakBridge Terrace Assisted Living Residence at Brittany Pointe Estates community in Lansdale, PA. I toured the facilities with the maintenance staff. The purpose of our visit is to validate and certify the fire drill requirements of Section 2800.132 of the Pennsylvania Code applicable to Assisted Living Residences. We utilized the 2012 edition of the National Fire Protection Association's *Life Safety Code*[®], NFPA 101 as the basis of our fire protection and life safety analysis. In addition, we evaluated the existing fire safety features present in the community and fire separations that could achieve designation as 'fire safe areas'¹. The following summary provides verification that the facilities meet the requirements as established by the Bureau of Human Services Licensing (BHSL).

ACTS operates *separated mixed use* facilities at Brittany Pointe Estates including OakBridge Terrace, an assisted living community (residential board and care); WillowBrooke Court, a skilled care nursing community and private apartment units. WillowBrooke Court, the skilled nursing unit is separated from the assisted living residence by two (2) hour fire rated walls where they connect. They are considered separate occupancies in accordance with the applicable building code and the 2000 edition of the *Life Safety Code*[®] enforced by the Commonwealth of Pennsylvania Department of Health. The *Life Safety Code*[®], NFPA 101 establishes that OBT is defined as Residential Board and Care Home.

The assisted living apartments house occupants that have some impairment to normal travel requiring assisted evacuation and would be classified as *prompt and slow* per NFPA 101 section 33.3.1.2. ACTS maintains a determination of the resident's evacuation capability at least annually. Should a resident exhibit changes during a regularly scheduled drill, they will be reevaluated at that time.

¹ The DHS suggests that most building codes require a 'fire safe area' to be separated by two (2) hour fire rated construction. In completely sprinklered buildings, a one-hour fire separation is all that is required by the International Building Code and the *Life Safety Code*[®] enforced in the Commonwealth of Pennsylvania. Therefore, we recognize these nationally promulgated standards for their definition of a safe area in lieu of the DHS suggestion.

The assisted living community is a two-story building with partial basement of Type III (200)² construction with complete automatic sprinkler protection. The assisted living portion of the buildings is a single smoke compartment on each floor. Additionally, there is a two-hour fire separation at the north end attaching to the skilled nursing unit. The exit stairs discharge directly to grade and provide more than minimally required exit capacity. There is a horizontal connection on the second floor to the Chestnut building via a pedestrian walkway. This connection can provide a horizontal egress on the second floor. The walkway is separated by two-hour fire rated construction.

The skilled nursing units were not surveyed during this visit because it is a nursing community.

This community meets the life safety requirements for an existing board and care occupancy per NFPA 101 Chapter 33 for large facilities. Travel distances from an apartment door to an exit are less than 120 feet. Travel distance within the individual apartments is less than 35 feet. These travel distances are well within the prescriptive requirements of the *Life Safety Code*[®]. There are no dead-end corridor conditions more than 50 feet.

Hazardous areas such as storage rooms are enclosed in 1-hour fire rated construction or smoke tight enclosures with sprinkler protection. Corridor walls are one (1) hour fire resistance rated with 45-minute fire rated doors to the units. Individual apartments are also separated by one (1) hour fire resistance rated construction. Interior finishes are typically class A. The building has a complete addressable fire alarm system with smoke detection in individual units and corridors and complete automatic sprinkler protection including a dry-pipe sprinkler system in the attic space. The fire alarm system consists of horns and strobe lights meeting the requirements of NFPA 72, *The National Fire Alarm and Signaling Code*.

The entire means of egress meets the requirements for illumination as established by the codes. Emergency lighting is provided by emergency generator as required for facilities with slow evacuation or impractical evacuation capability. All exits and directional exit signs meet the established criteria and are powered by the emergency generator.

During the survey, the following records were examined for maintenance and testing of systems:

- Fire alarm and detection
- Automatic sprinkler system
- Fire extinguishers
- Emergency generators
- Fire and smoke dampers
- Fire doors

² The construction type is based on the *Life Safety Code*[®] requirements. The building was originally designed to comply with the 1985 edition of the *Life Safety Code*[®] and the 1993 edition of the BOCA National Building Code. The construction classification meets the minimum standards required for an assisted living facility.

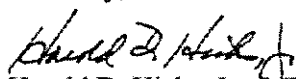
We also inspected fire and smoke barriers for penetrations. Where unprotected penetrations were observed, the community made immediate corrective actions. The means of egress was reviewed for adequacy of normal and emergency lighting; placement of directional exit signs and maintenance of the egress paths.

During our visit, we reviewed the fire drills for the community over the past year and found them to be within times established for safe egress. Drills are conducted once each quarter during each shift for a total of 12 drills per year. We certify that the fire drills meet the nationally accepted standards developed by the National Fire Protection Association and the Uniform Construction Codes adopted by the Commonwealth of Pennsylvania. We conducted an evacuation drill during the visit with all occupants being safely evacuated in 4 minutes and 17 seconds. A smoke detector was initiated in apartment 101. The drill was critiqued with the staff following the alarm.

Section 33.2.1.3.2.7 of the *Life Safety Code*³, NFPA 101 2012 establishes 8 minutes as a nationally recognized acceptable standard of practice for small residential board and care occupancies that do not have the fire protection and life safety measures that this community does have. Further, NFPA 101 states that evacuation times more than 13 minutes can be expected when the evacuation capability is considered impractical.³

Therefore, based upon our fire safety survey conducted on March 7, 2018 and review of the drills conducted in the past 12 months, this large community meets or exceeds the minimum standards established by §2800.132 of the Pennsylvania Code. Given the level of fire protection and life safety provided for this community, the maximum allowable evacuation time shall be set at **13 minutes** for each smoke zone based on the availability of horizontal egress movement and the level of built-in fire protection.

Sincerely,



Harold D. Hicks, Jr., P.E., FSFPE
President/Fire Protection Engineer

HDH/pah/Brittany Pointe Estates DHS Certification 2018

³ NFPA 101 Section A.3.3.76 "Evacuation Capability. Translation of drill times to evacuation capability is determined as follows:

- (1) 3 minutes or less — prompt
- (2) Over 3 minutes, but not in excess of 13 minutes— slow
- (3) More than 13 minutes — impractical"

**Adult Residential Licensing – Assisted Living Residences
Supervised Fire Drill and Fire Safety Inspection
55 Pa. Code § 2800.132(b)**

To Whom It May Concern:

On, March 7, 2018 I supervised a fire drill and conducted a fire-safety inspection at
(Date)

ACTS Brittany Pointe Estates, located at 1001 Valley Forge Road, Lansdale, PA.
(Name of home) (Address of home)

I am qualified to supervise the drill and conduct an inspection because I am not an employee of the home and hold the following credentials (Circle one or more of the following):

- | | |
|--|--|
| 1. Member of a local fire department | 6. Graduate of a county or Commonwealth fire school |
| <u>2. Fire protection engineer</u> | 7. Volunteer trained and certified by a county or Commonwealth fire school |
| 3. Commonwealth-certified fire protection instructor | 8. Department of Labor and Industry building code inspector |
| 4. College instructor in fire science | 9. Construction code official |
| 5. Insurance company loss control representative | |

Signature:  Date: March 19, 2018

Name: Harold D. Hicks
Title: Fire Protection Engineer
Name and Address of Organization:
Atlantic Code Consultants
4530 William Penn Hwy. #4350
Murrysville, PA 15668-2002

Telephone Number: 412-860-8709

This information is valid for one year from the date signed.

Adult Residential Licensing — Assisted Living Residences
Fire Evacuation Time/Fire Safe Area Designation
55 Pa. Code § 2800.132(d)

To Whom It May Concern:

On, March 7, 2018 I inspected Brittany Pointe Estates, located at 1001 Valley Forge Road, Lansdale, PA.
(Date) (Name of home) (Address of home)

Based on that inspection, I have determined that the maximum safe evacuation time for the home, from the time the fire alarm sounds until all residents have evacuated to the outside of the building / fire safe area(s)
(Circle only one)

is 13 minutes and 0 seconds. I have made this determination based on the design and construction of the home as supported in our letter to the home. In addition, I have determined that the home does/does NOT have a fire—safe area(s)*.

(Circle only one)

The fire-safe areas in this home, if any, are:

(DO NOT complete this section if the home does not have fire-safe areas. Describe fire safe areas in detail; the description must include the number of fire-safe areas and the specific location of each fire-safe area. Attach additional pages if necessary and include a diagram if appropriate to positively identify the area(s))

I am qualified to make these determinations because I am not an employee of the home and hold the following credentials (Circle one or more of the following):

- | | |
|--|--|
| 1. Member of a local fire department | 6. Graduate of a county or Commonwealth fire school |
| <u>2. Fire protection engineer</u> | 7. Volunteer trained and certified by a county or Commonwealth fire school |
| 3. Commonwealth-certified fire protection instructor | 8. Department of Labor and Industry building code inspector |
| 4. College instructor in fire science | 9. Construction code official |
| 5. Insurance company loss control representative | |

Signature: Harold D. Hicks Date: March 19, 2018

Name: Harold D. Hicks, FSFPE
Title: Fire Protection Engineer
Name and Address of Organization:
Atlantic Code Consultants
4530 William Penn Hwy. #4350
Murrysville, PA 15668-2002

Telephone Number: 412-860-8709

This information is valid for one year from the date signed.

* Fire safe areas are also referred to as areas of refuge in most fire codes. Under most building codes, a fire safe area usually requires a two-hour separation from other areas of the building, including self closing doors, but this is not specifically required under chapter 2600.