

New Jersey Department of Health

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  <b>50A001</b>	(X2) MULTIPLE CONSTRUCTION A. BUILDING: _____  B. WING _____	(X3) DATE SURVEY COMPLETED  <b>12/17/2021</b>
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NAME OF PROVIDER OR SUPPLIER  <b>BRIGHTON GARDENS OF EDISON</b>	STREET ADDRESS, CITY, STATE, ZIP CODE <b>1801 OAK TREE ROAD EDISON, NJ 08820</b>
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(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE DEFICIENCY)	(X5) COMPLETE DATE
A 000	<p>Initial Comments</p> <p>Initial Comments: A COVID-19 Focused Infection Control Survey was conducted by the State Agency on 12/17/2021. The facility was found not to be in compliance with the New Jersey Administrative Code 8:36 infection control regulations standards for Licensure of Assisted Living Residences, Comprehensive Personal Care Homes and Assisted Living Programs and Centers for Disease Control and Prevention (CDC) recommended practices to prepare for COVID-19.</p> <p>The census was 87.</p> <p>The sample size was 5.</p> <p>The facility must submit a plan of correction, including a completion date for each deficiency and ensure that the plan is implemented. Failure to correct deficiencies may result in enforcement action in accordance with provisions of New Jersey Administrative Code Title 8, Chapter 43E, Enforcement of Licensure Regulations</p>	A 000		
A1207	<p>8:36-17.3(a)(11) Housekeeping-Sanitation-Safety-Maintenance</p> <p>(a) The housekeeping and sanitation conditions in paragraphs 1 through 12 below shall be met. Application of this requirement with respect to the individual living environment shall take into consideration residents' personal preferences for style of living:</p> <p>11. When facility housekeeping services are provided, items such as bedpans, toilets and sinks shall be disinfected, using a</p>	A1207		

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE

TITLE

(X6) DATE

03/09/22

New Jersey Department of Health

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A1207	<p>Continued From page 1</p> <p>process for disinfection established by the facility; and</p> <p>This REQUIREMENT is not met as evidenced by: Based on observation, interview, facility policy review, and review of the Centers for Disease Control and Prevention (CDC) guidelines, it was determined that the facility failed to ensure housekeeping staff exercised appropriate cleaning technique when cleaning residents' bathrooms. This deficient practice was observed in 1 of 2 housekeepers, Housekeeper (HSK) #1 which had the potential to affect all residents of the facility and occurred during the COVID-19 pandemic.</p> <p>Findings included:</p> <p>Reference: The Centers for Disease Control and Prevention (CDC) General environmental cleaning techniques, last reviewed on 04/21/2020 and retrieved on 10/25/2021 from <a href="http://www.cdc.gov/hai/prevent/resource-limited/cleaning-procedures.html">http://www.cdc.gov/hai/prevent/resource-limited/cleaning-procedures.html</a>, indicated, "Patient area toilets-Toilets in patient care areas can be private (within a private patient room) or shared (among patients and visitors). They have high patient exposure (i.e., high-touch surfaces) and are frequently contaminated. Therefore, they pose a higher risk of pathogen transmission than in general patient areas." It further indicated: "For all environmental cleaning procedures, always use the following general strategies: Wipe surfaces using the general strategies ... (e.g.,</p>	A1207		

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A1207	<p>Continued From page 2</p> <p>clean to dirty, high to low, systematic manner)."</p> <p>1. On 12/17/2021 at 11:01 AM, the surveyor observed Housekeeper (HSK) #1 cleaning in Room [REDACTED] HSK #1 took a toilet brush from the cleaning cart and went into the bathroom. She sprayed some cleaning solution into the toilet bowl and washed the inner portion of the toilet with the brush. Then HSK #1 continued to use the toilet brush to wash other surfaces in the bathroom, including the sink, faucet, shower walls, tap, and the shower floor.</p> <p>On 12/17/2021 at 11:17 AM, HSK #1 stated in an interview that she had been trained to clean from low-touch to high-touch area, from clean to dirty, and to observe the manufacturer recommended contact time for chemical disinfectants. HSK #1 told the surveyor that she always performed the cleaning in the manner observed above. HSK #1 explained to the surveyor that the bathroom was already contaminated and it made no difference using the toilet brush to clean other surfaces in the residents' bathrooms. HSK #1 stated that the toilet brush made it easier to access areas of the bathroom that would have otherwise been unreachable for her.</p> <p>On 12/17/2021 at 11:22 AM, the Executive Director (ED) stated that housekeeping staff should not be using toilet brushes to clean any areas other than inside the toilet bowl.</p> <p>On 12/17/2021 at 12:53 PM, the Infection Control Preventionist (ICP) stated that he led the facility-wide training related to infection control measures to prevent the spread of COVID-19 and any other infection across the facility. The ICP stated that HSK #1's practice of using a toilet</p>	A1207		
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A1207	Continued From page 3  brush to wash other surfaces within residents' bathrooms was not acceptable. The ICP instructed housekeeping staff to re-clean the resident rooms and bathrooms.  A review of the undated policy titled, "Sunrise Senior Living Housekeeping: Cleaning Procedures for COVID-19 Virus Policy," revealed, "Effective cleaning is always a critical component in reducing the spread of diseases."	A1207		
A1299	8:36-18.3(a)(5) Infection Prevention and Control Services  (a) Written policies and procedures shall be established and implemented regarding infection prevention and control, including, but not limited to, policies and procedures for the following:  5. Techniques to be used during each resident contact, including handwashing before and after caring for a resident;  This REQUIREMENT is not met as evidenced by: Based on observation, interview, and review of Centers for Disease Control and Prevention (CDC) guidelines, the facility failed to implement an infection prevention and control program (IPCP) when staff failed to perform hand hygiene between resident contact or touching their mask or clothing and and failing to assist residents with hand hygiene before eating their meal. This deficient practice was observed by 2 of 2 dietary aides during the lunch meal service.	A1299		

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A1299	<p>Continued From page 4</p> <p>Findings included:</p> <p>Reference: A review of the Centers for Disease Control and Prevention (CDC) Hand Hygiene Guidance, retrieved from <a href="https://www.cdc.gov/handhygiene/providers/guidelin.html">https://www.cdc.gov/handhygiene/providers/guidelin.html</a>, updated 1/30/2020, retrieved on 12/19/2021, read in part, "Multiple opportunities for hand hygiene may occur during a single care episode. Following are the clinical indications for hand hygiene: Use an alcohol-based hand sanitizer immediately before touching a patient, before performing an aseptic task (e.g., placing an indwelling device) or handling invasive medical devices, before moving from work on a soiled body site to a clean body site on the same patient, after touching a patient or the patient's immediate environment, after contact with blood, body fluids or contaminated surfaces, and immediately after glove removal. Wash with soap and water when hands are visibly soiled, after caring for a person with known or suspected infectious diarrhea, and after known or suspected exposure to spores."</p> <p>1. On 12/17/2021 at 11:45 AM, the surveyor observed a group of 19 random residents in the dining room. Dietary Aide (DA) #1 and DA #2 proceeded to serve the residents small bowls of soup. The DAs assisted the residents with moving their wheelchairs and/or chairs so that the residents sat closer to the table. DA #1 and DA #2 proceeded to retrieve the individual resident's meal from the kitchen and placed the meals on the table. During the meal service, the surveyor observed DA #1 and DA #2 intermittently adjust their facemasks and patted the residents on their backs as they served and encouraged each resident to eat their meals. DA</p>	A1299		
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A1299	<p>Continued From page 5</p> <p>#1 and DA #2 did not use a serving tray when they served the soup in the small bowls to the residents. The DAs held the residents' bowls of soup in their hands such that portions of their fingers were touching the residents' soup as they served it to the resident. DA #1 and DA #2 failed to perform hand hygiene between each resident contact. They did not offer or encourage the residents to perform hand hygiene prior to the meal service.</p> <p>On 12/17/2021 at 1:03 PM, the surveyor interviewed DA #1 and DA #2 together. They stated that they had been trained on the need to perform hand hygiene on themselves prior to engaging in any kitchen task, after they contacted their mask, after they used the bathroom, and in between resident contacts. Per the DAs, the care managers were responsible for ensuring that residents were offered and/or encouraged to perform hand hygiene before the residents came in the dining room. DA #1 and DA #2 stated that they thought the residents had been encouraged and assisted with hand hygiene before they came in the dining room. DA #1 and DA #2 acknowledged that they failed to perform hand hygiene and to offer the same to the residents throughout the meal service.</p> <p>On 12/17/2021 at 1:34 PM, the surveyor interviewed the Executive Director (ED), Dietary Manager, and the Infection Control Preventionist (ICP). The Executive Director stated it was the responsibility of all staff to ensure residents' hands were cleaned appropriately when they ate their meals. The ICP stated that staff training on infection control practices had been ongoing across the facility. The Dietary Manager (DM) stated that staff should not assume residents'</p>	A1299		
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A1299	Continued From page 6  hands were clean. The DM stated that dietary staff should remind, provide/offer, and/or encourage residents to clean their hands before they ate their meals. The DM stated that dietary staff should utilize serving trays and handle plated meals by holding the plates with opened palm holding the sides of the meal plates or by holding the handles in the case of a cup. The DM concluded that the observation of DA #1's and DA #2's fingers touching the residents' soup and not cleaning their hands or changing gloves after touching their mask or clothing was unacceptable.	A1299		

## STATE FORM: REVISIT REPORT

PROVIDER / SUPPLIER / CLIA / IDENTIFICATION NUMBER 50A001	Y1	MULTIPLE CONSTRUCTION A. Building B. Wing	Y2	DATE OF REVISIT 3/9/2022	Y3
NAME OF FACILITY BRIGHTON GARDENS OF EDISON			STREET ADDRESS, CITY, STATE, ZIP CODE 1801 OAK TREE ROAD EDISON, NJ 08820		

This report is completed by a State surveyor to show those deficiencies previously reported that have been corrected and the date such corrective action was accomplished. Each deficiency should be fully identified using either the regulation or LSC provision number and the identification prefix code previously shown on the State Survey Report (prefix codes shown to the left of each requirement on the survey report form).

ITEM Y4	DATE Y5	ITEM Y4	DATE Y5	ITEM Y4	DATE Y5
ID Prefix A1207	Correction	ID Prefix A1299	Correction	ID Prefix	Correction
Reg. # 8:36-17.3(a)(11)	Completed	Reg. # 8:36-18.3(a)(5)	Completed	Reg. #	Completed
LSC	03/17/2022	LSC	03/17/2022	LSC	
ID Prefix	Correction	ID Prefix	Correction	ID Prefix	Correction
Reg. #	Completed	Reg. #	Completed	Reg. #	Completed
LSC		LSC		LSC	
ID Prefix	Correction	ID Prefix	Correction	ID Prefix	Correction
Reg. #	Completed	Reg. #	Completed	Reg. #	Completed
LSC		LSC		LSC	
ID Prefix	Correction	ID Prefix	Correction	ID Prefix	Correction
Reg. #	Completed	Reg. #	Completed	Reg. #	Completed
LSC		LSC		LSC	
ID Prefix	Correction	ID Prefix	Correction	ID Prefix	Correction
Reg. #	Completed	Reg. #	Completed	Reg. #	Completed
LSC		LSC		LSC	

REVIEWED BY STATE AGENCY <input type="checkbox"/>	REVIEWED BY (INITIALS)	DATE	SIGNATURE OF SURVEYOR	DATE
REVIEWED BY CMS RO <input type="checkbox"/>	REVIEWED BY (INITIALS)	DATE	TITLE	DATE
FOLLOWUP TO SURVEY COMPLETED ON 12/17/2021		<input type="checkbox"/> CHECK FOR ANY UNCORRECTED DEFICIENCIES. WAS A SUMMARY OF UNCORRECTED DEFICIENCIES (CMS-2567) SENT TO THE FACILITY? <input type="checkbox"/> YES <input type="checkbox"/> NO		



# Sunrise Senior Living Plan of Correction

**Name of Community/Provider:** Brighton Gardens of Edison  
**Address of Community/Provider:** 1801 Oak Tree Road, Edison, NJ 08820  
**Provider/Supplier/CLIA ID #: License:** 061222/CLIA # 31D2242235  
**Date Survey Completed:** 12/17/2021  
**Name/Title of Legal Entity Representative Signing the Plan of Correction:**  
Katrina Labayen

**Signature of Sunrise Representative:** *Katrina Labayen*

**Date of Submission:** 1/24/21

**hID PREFIX TAG:** A1207

1. How the corrective action will be accomplished for those residents found to be affected by deficient practice.

The Maintenance/Housekeeping Coordinator immediately educated and in-serviced the Housekeeping staff on Infection Control and proper room-cleaning procedures on 12/17/21.

The community immediately purchased new cleaning brushes for the housekeepers to use when cleaning resident bathrooms and rooms on 12/17/21.

The Infection Control Preventionist instructed the Housekeeping staff to immediately re-clean the resident rooms and bathrooms on 12/17/21.

Completion Date: 12/17/21

2. How the facility will identify other residents having the potential to be affected by the same deficient practice.

All Housekeeping staff were provided refresher training on proper room-cleaning procedures and Infection Control by the Maintenance/Housekeeping Coordinator with return demonstration required. All other Housekeeping Staff demonstrated proper knowledge of room-cleaning procedures and all steps were completely and properly performed.

Completion Date: 12/17/21

## Sunrise Senior Living Plan of Correction

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Katrina Labayen

**Signature of Sunrise Representative:** *Katrina Labayen*

**Date of Submission:** 1/24/21

3. What measures will be put into place or systematic changes made to ensure that the deficient practice will not recur.

The community will follow the recommendation of the Centers for Disease Control and Prevention (CDC) General environmental cleaning techniques, last reviewed on 04/21/2020 and retrieved on 10/25/2021 indicating: "For all environmental cleaning procedures, always use the following general strategies: Wipe surfaces using the general strategies...(e.g., clean to dirty, high to low, systematic manner)."

Housekeeping staff will continue to wipe surfaces in a clean to dirty, high to low, and systematic manner. The Housekeeping staff also have long-handled cleaning brushes to use on hard-to-reach places. These cleaning brushes will be disinfected after every resident room with an EPA-approved disinfectant.

The Housekeeping/Maintenance Coordinator will continue to review proper room-cleaning procedures during monthly staff meetings.

Completion Date: 3/17/21

4. How the facility will monitor its corrective actions to ensure that the deficient practice is being corrected and will not recur.

The Executive Director (ED)/Designee will monitor the Housekeepers, including HSK #1, conducting random weekly observations for 3 months to confirm that the above recommendation is followed. Any discrepancies will be immediately corrected.

The ED/Designee will report the findings of the weekly observation to the Quality Assurance Performance Improvement (QAPI) Committee for 3

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Katrina Labayen

**Signature of Sunrise Representative:** *Katrina Labayen*

**Date of Submission:** 1/24/21

months to confirm that the processes outlined above are sustained. During and at the conclusion of the 3-month period, the Committee will re-evaluate and initiate any necessary action or extend the review period. The ED is responsible for ensuring implementation and ongoing compliance of this POC and addressing and resolving any variances that may occur.

Completion Date: 3/17/21

### **ID PREFIX TAG: A1299**

1. How the corrective action will be accomplished for those residents found to be affected by deficient practice.

All Community Staff, including but not limited to Dining Staff, were immediately in-serviced on proper handwashing practices between resident contact or touching their mask or clothing on 12/17/21.

The Dining Services Coordinator (DSC) immediately educated DA#1 and DA#2 on proper meal-service procedures on 12/17/21 which included: avoiding touching the rim of glasses or cups and avoiding touching the eating surface of plates and bowls. Staff were also re-educated to assist residents with hand hygiene before eating their meal on the same day.

Completion Date: 12/17/21

2. How the facility will identify other residents having the potential to be affected by the same deficient practice.

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Katrina Labayen

**Signature of Sunrise Representative:** *Katrina Labayen*

**Date of Submission:** 1/24/21

All Dining Staff were provided refresher training on proper meal-service and handwashing practices by the Dining Services Coordinator with return demonstration required. All other Dining Staff demonstrated proper knowledge of proper meal-service procedures and handwashing practices.

Completion Date: 12/31/21

3. What measures will be put into place or systematic changes made to ensure that the deficient practice will not recur.

The Community will continue to follow the Centers for Disease Control and Prevention (CDC) guidelines for Hand Hygiene to perform hand hygiene under the specified clinical indications including, but not limited to, before touching a patient, after touching a patient or the patient's immediate environment, and immediately after glove removal.

The Community will continue to follow the Sunrise Infection Control Program which indicates key situations where hand hygiene should be performed, including but not limited to, before eating, before, during and after preparing food, before beginning work, and before and after direct contact with a resident's intact skin or the resident's environment.

All Community Staff have been in-serviced on proper handwashing practices between resident contact or touching their mask or clothing beginning on 12/17/21. All Community Staff, including by not limited to Dining Staff, have been re-educated that all staff members must assist residents with hand hygiene prior to meal service. All Community Staff continue to be educated on proper handwashing practices at monthly Town Hall Meetings and bi-annually for required Staff training.

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**Date of Submission:** 1/24/21

Handwashing signage was placed at resident eye-level at the Dining Room entrance and additional Hand Sanitizers have been implemented throughout the dining room for ease of access to assist residents with hand hygiene.

Community will make available small portable hand sanitizers to all community staff members to have readily available.

Completion Date: 1/17/21

4. How the facility will monitor its corrective actions to ensure that the deficient practice is being corrected and will not recur.  
The Executive Director (ED)/Designee will monitor the Housekeepers for 3 months, conducting random weekly observations to confirm that the above recommendation is followed. Any discrepancies will be immediately corrected.

The ED/Designee will report the findings of the weekly observation to the Quality Assurance Performance Improvement (QAPI) Committee for 3 months to confirm that the processes outlined above are sustained. During and at the conclusion of the 3-month period, the Committee will re-evaluate and initiate any necessary action or extend the review period.

The ED is responsible for ensuring implementation and ongoing compliance of this POC and addressing and resolving any variances that may occur.

Completion Date: 3/17/21