



**State of New Jersey**  
**DEPARTMENT OF HEALTH**  
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[www.nj.gov/health](http://www.nj.gov/health)

PHILIP D. MURPHY  
*Governor*

SHEILA Y. OLIVER  
*Lt. Governor*

JUDITH M. PERSICILLI, RN, BSN, MA  
*Commissioner*

IN RE : ORDER PARTIALLY LIFTING THE NOVEMBER 18, 2020  
 : DIRECTED PLAN OF CORRECTION AS AMENDED  
 BENTLEY COMMONS at PARAGON :  
 VILLAGE :  
 (NJ Facility ID# NJ60A008) :

TO: Shridevi Babu, Administrator  
 Bentley Commons at Paragon Village  
 425/427 Route 46 East  
 Hackettstown, New Jersey 07840

On November 18, 2020, the Department of Health (Department) issued an Emergency Curtailment of Admissions order and Directed Plan of Correction (DPOC), which it amended by Order dated December 10, 2020. The DPOC required the facility to retain the full-time services of a Certified Infection Control Practitioner (ICP) consultant.

On December 24, 2020, the Department lifted the November 18, 2020, Emergency Curtailment of Admissions Order as amended on December 10, 2020. The requirements related to the Directed Plan of Correction remained in place. By letter dated December 16, 2021, the facility requested a hearing before the New Jersey Office of Administrative Law. On May 13, 2021, the parties agreed to settle the matter, and the Department hereby partially lifts the DPOC upon the following terms:

1. Certified Infection Control Practitioner (ICP)
  - a. The ICP must visit the facility every other month to oversee the individual at the facility who is the appointed Infection Control person for a minimum of 6 months to ensure that the facility is providing proper Infection Control Protocol. Visits must consist of visual inspections of Infection Protocol compliance throughout the building, personal protective equipment (PPE) usage and education of staff, and proper quarantine procedures for positive residents and Persons Under Investigation.
  - b. The ICP consultant shall have no previous or current ties to the Facility's principals, management and/or employers or other related individuals of any kind, including, but not limited to, employment, business or personal ties. The consultant shall be completely independent of Bentley.

- c. Bentley must notify the Department if the ICP ceases the contractual relationship. Within ten (10) business days Bentley must provide the Department with the name and resume of the new consultant for approval. The ICP consultant's resume should be sent to Donna.Koller@doh.ni.gov and Lisa.King@doh.ni.gov.

2. Infection Control:

- a. Daily infection prevention community audits will continue to be conducted by the leadership team of the facility and reviewed with the Association of Professionals in Infection Control and Epidemiology (APIC) on their bi-monthly visits.

The leadership team shall consist of:

Executive Director  
Director of Nursing  
Maintenance Director  
Infection Preventionist


- b. Bentley will follow proper CDC and Department guidelines regarding infectious control procedures.
- c. Bentley shall continue staff training on infection control.

3. Reporting:

- a. Bentley shall comply with the reporting terms provided in the December 10, 2020, Amended Curtailment of Admission Directed Plan of Correction. However, the frequency of the reports shall decrease. The terms are as follows:
- b. Bentley shall send reports on the last Friday of every other month by 1:00 p.m. to the Communicable Disease Services (CDS) Healthcare Associated Infections Coordinator, Jason Mehr, MPH, CIC, Jason.Mehr@doh.nj.gov, with a copy to [Donna.Koller@doh.nj.gov](mailto:Donna.Koller@doh.nj.gov).
- c. The reports shall include timely updates regarding identified areas of non-compliance with infection control protocol, corrective measures to address identified areas of non-compliance and status of corrective measures implementation.
- d. Bentley shall report the status of any outbreak investigation and identified cases (as defined by Communicable Disease Services).
- e. Bentley must maintain timely communication with the Department as may be required, including by both the Facility's infection prevention team and the ICP consultant.

This Order Partially Lifting the November 18, 2020, DPOC, as amended, shall remain in effect until lifted in writing by the Department.

If you have any questions regarding this Order, please contact Lisa King in the Office of Program Compliance at [Lisa.King@doh.nj.gov](mailto:Lisa.King@doh.nj.gov).



Lisa King, Program Manager  
Office of Program Compliance  
Division of Certificate of Need and Licensing  
New Jersey Department of Health

LK:jlm:dj  
September 21, 2021  
Control #20043/Event ID #VQOL11  
Via Certified, Regular and E-mail  
([rdioguardi@kapdev.com](mailto:rdioguardi@kapdev.com) and [tford@einhornharris.com](mailto:tford@einhornharris.com))

Nursing Home Administrators Licensing Board  
Frank Skrajewski, Long Term Care Licensing  
Donna Koller, Long Term Care Survey & Certification  
Pamela LeBak, Long Term Care Survey & Certification