



STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
AGING AND LONG-TERM SUPPORT ADMINISTRATION  
**20425 72nd Avenue S, Suite 400, Kent, WA 98032**

BELLEVUE GARDENS MANAGER LLC  
THE GARDENS AT TOWN SQUARE  
933 111th Ave NE  
Bellevue, WA 98004

RE: THE GARDENS AT TOWN SQUARE License # 1604

Dear Administrator:

This letter addresses Compliance Determination(s) 58592 (Completion Date 04/25/2025) and 55420 (Completion Date 02/26/2025).

The Department completed a follow-up inspection of your Assisted Living Facility on 04/25/2025 and found no deficiencies. Your facility meets the Assisted Living Facility licensing requirements.

The Department found that deficiencies for the following licensing laws and regulations were corrected:  
WAC 388-78A-2450-2-e, WAC 388-78A-2450-3-d-i-A, WAC 388-78A-2450-3-d-i-B, WAC 388-112A-0090-4, WAC 246-980-030-2

The Department staff who did the on-site verification:  
Michelle Yip, ALF Licensor

If you have any questions, please contact me at (253)234-6020.

Sincerely,

Laurie Anderson, Community Field Manager  
Region 2, Unit D  
Residential Care Services



STATE OF WASHINGTON  
DEPARTMENT OF SOCIAL AND HEALTH SERVICES  
AGING AND LONG-TERM SUPPORT ADMINISTRATION  
**20425 72nd Avenue S, Suite 400, Kent, WA 98032**

Statement of Deficiencies	License #: 1604	Compliance Determination # 55420
Plan of Correction	THE GARDENS AT TOWN SQUARE	Completion Date
Page 1 of 4	Licensee: BELLEVUE GARDENS MANAGER LLC	02/26/2025

You are required to be in compliance at all times with all licensing laws and regulations to maintain your Assisted Living Facility license.

The department completed data collection for an unannounced on-site follow-up on 02/26/2025 of:

THE GARDENS AT TOWN SQUARE  
933 111TH AVE NE  
BELLEVUE, WA 98004

This document references the following SOD dated: 02/26/2025

The following sample was selected for review during the unannounced on-site visit: 0 of 38 current residents and 0 former residents.

The department staff that inspected the Assisted Living Facility:

Michelle Yip, ALF Licensor

From:  
DSHS, Aging and Long-Term Support Administration  
Residential Care Services, Region 2 , Unit D  
20425 72nd Avenue S, Suite 400  
Kent, WA 98032

As a result of the on-site visit(s) the department found that you are not in compliance with the licensing laws and regulations as stated in the cited deficiencies in the enclosed report.

*Laurie Anderson*

03/11/2025

Residential Care Services

Date

I understand that to maintain an Assisted Living Facility license, the facility must be in compliance with all the licensing laws and regulations at all times.

Administrator (or Representative)

Date

**WAC 246-980-030 Can a nonexempt long-term care worker work before obtaining certification as a home care aide?**

(2) The long-term care worker may not work for more than two hundred calendar days from their date of hire without obtaining certification.

**WAC 388-112A-0090 Which long-term care workers are exempt from the seventy-hour long-term care worker basic training requirement? The following long-term care workers are exempt from the seventy-hour long-term care worker basic training requirement:**

(4) A nursing assistant certified under chapter 18.88A RCW and a person in an approved training program for certified nursing assistants under chapter 18.88A RCW provided they complete the training program within one hundred twenty days of the date of hire and the department of health has issued the nursing assistant certified credential within two hundred days of the date of hire;

**WAC 388-78A-2450 Staff.**

(2) The assisted living facility must:

(e) Ensure all resident care and services are provided only by staff persons who have the training, credentials, experience and other qualifications necessary to provide the care and services;

(3) The assisted living facility must:

(d) Maintain the following documentation on the assisted living facility premises, during employment, and at least two years following termination of employment:

(i) Staff orientation and training or certification pertinent to duties, including, but not limited to:

(A) Training required by chapter 388-112A WAC;

(B) Home care aide certification as required by this chapter and chapter 246-980 WAC;

**This requirement was not met as evidenced by:**

Based on interview and record review, the facility failed to ensure that 1 of 1 sampled staff (Staff A) was qualified to work with vulnerable adult residents. This failure placed all 38 residents at risk for receiving care from an unqualified staff.

## Findings included...

Review of the Department of Social and Health Services (DSHS) Secure Tracking and Reporting System (STARS) showed that on 01/16/2025, the Assisted Living Facility (ALF) received a citation for this regulation. The ALF signed an attestation statement that stated the facility would have a system in place and the deficiency corrected by 01/27/2025.

Note: WAC 246-980-025 Individuals exempt from obtaining a home care aide certification.

(2) The following long-term care workers are not required to obtain certification as a home care aide. If they choose to voluntarily become certified, they must meet the requirements of WAC 246-980-040. The training requirements under RCW 74.39A.074(1) are not required.

(c) A person who is in an approved training program for certified nursing assistant under chapter 18.88A RCW, provided that the training program is completed within 120 calendar days of the date of hire and that the nursing assistant-certified credential has been issued within 200 calendar days of the date of hire.

Review of the Department of Social and Health Services' (DSHS) "Dear Provider/Administrator Letter", dated 10/13/2023, showed that DSHS set training and continuing education (CE) requirements for long-term care workers (LTCW) while the Department of Health (DOH) maintained certification deadlines for LTCW. The document showed the DSHS established permanent rules related to training and CE requirements. The document showed that LTCW, who were hired or rehired on and after 02/01/2024, were required to complete the basic training no later than 120 days from the hire date and to be certified no later than 200 days from the hire date.

Review of the facility's "Job Description for Resident Assistant (RA)", dated September 2016, showed that RA's duties and responsibilities included providing personal care to residents, assisting residents with their self-medications, and administering medication under nurse delegation protocols. The document showed that the RA's education requirements included a Certified Nursing Assistant (CNA), or a Home Care Aide (HCA) Certification. The document showed that the RA's education requirements included a Registered Nursing Assistant (NAR) Certification as acceptable with proof of graduation, a copy of NAR license, and on condition that CNA license is earned within 120 days of hire.

Review of the facility's Employee Roster showed that the facility hired Staff A, NAR, RA, on 04/16/2024. Review of Staff A's employee records showed that Staff A's NAR was in

active status. The records showed that on 10/30/2024, 197 days after hire, Staff A completed the DSHS Nursing Assistant Training Program. The records showed that Staff A completed their State Skills Competency Examination, which was a nursing assistant certification requirement, on 02/14/2025. The records showed that as of 02/26/2025, Staff A's Washington state DOH Nursing Assistant Certification was in pending status.

Review of Staff A's work schedule showed that between 01/27/2025 and 02/26/2025, Staff A worked as Resident Assistant in the facility every week, while their CNA certification was pending.

During an interview on 02/26/2025 at 1:22 PM, Collateral Contact 1 (CC 1), Health Systems Quality Assurance, DOH, stated that Staff A's Nursing Assistant Certification was in pending status. CC 1 stated that Staff A's CNA application was submitted on 02/14/2025 and was currently under review.

During an interview on 02/26/2025 at 1:05 PM, Staff B, Executive Director, stated that they were aware of the certification requirements for nursing assistants. Staff B stated that they were aware Staff A completed the nursing assistant program and passed the required written examination and skill test for CNA certification. Staff B stated that they were unaware Staff A's CNA was in pending status. Staff B stated that the supervisor placed Staff A on work schedule. Staff B stated that Staff A worked as Resident Assistant in the AL unit and provided direct care to residents between 01/27/2025 and 02/26/2025.

This is an uncorrected deficiency previously cited on 01/16/2025, WAC 388-78A-2450 subsections (2)(e), (3)(d)(i)(A)(B).

**Plan/Attestation Statement**

I hereby certify that I have reviewed this report and have taken or will take active measures to correct this deficiency. By taking this action, THE GARDENS AT TOWN SQUARE is or will be in compliance with this law and / or regulation on (Date) \_\_\_\_\_.

In addition, I will implement a system to monitor and ensure continued compliance with this requirement.

Administrator (or Representative)

Date



**Residential Care Services  
Investigation Summary Report**

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**Provider/Facility:** THE GARDENS AT TOWN SQUARE **Provider Type:** Assisted Living Facility

**License/Cert.#:** 1604

**Intake ID:** 162916

**Compliance Determination #:** 53069

**Region/Unit #:** RCS Region 2 / Unit D

**Investigator:** Michelle Yip

**Investigation Date(s):** 01/13/2025 through 01/16/2025

**Complainant Contact Date(s):**

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**Allegation(s):**

Named Staff did not complete training and certification as required.

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**Investigation Methods:**

**Sample:** Total residents: 60  
Resident sample size: 1  
Closed records sample size: 0

**Observations:** Residents  
Staff to resident interactions

**Interviews:** Identified staff  
Executive Director  
Nursing staff

**Record Reviews:** Facility policies  
Personnel files  
Staff training records  
Resident Records

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**Investigation Summary:**

Record review showed the Named Staff did not complete the nursing assistant training program within 120 days of hire. The record showed the Named Staff did not complete and receive the nursing assistant certification or the home care aide certification within 200 days of hire, as required. Facility interview and record review showed that the Named Staff provided direct care and administered medications without the proper qualifications after passing the training and certification deadlines. Failed practice was identified.

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**Conclusion / Action:**

- Failed Provider Practice Identified / Citation(s) Written
- Failed Provider Practice Not Identified / No Citation Written
- N/A



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Statement of Deficiencies	License #: 1604	Compliance Determination # 53069
Plan of Correction	THE GARDENS AT TOWN SQUARE	Completion Date
Page 1 of 4	Licensee: BELLEVUE GARDENS MANAGER LLC	01/16/2025

You are required to be in compliance at all times with all licensing laws and regulations to maintain your Assisted Living Facility license.

The department completed data collection for an unannounced on-site complaint investigation on 01/13/2025, 01/13/2025 and 01/13/2025 of:

THE GARDENS AT TOWN SQUARE  
 933 111TH AVE NE  
 BELLEVUE, WA 98004

This document references the following complaint number(s): 162916

The following sample was selected for review during the unannounced on-site visit: 1 of 60 current residents and 0 former residents.

The department staff that investigated the Assisted Living Facility:

Michelle Yip, ALF Licensor

From:  
 DSHS, Aging and Long-Term Support Administration  
 Residential Care Services, Region 2 , Unit D  
 20425 72nd Avenue S, Suite 400  
 Kent, WA 98032

As a result of the on-site visit(s), the department found that you are not in compliance with the licensing laws and regulations as stated in the cited deficiencies in the enclosed report.

\_\_\_\_\_  
 Residential Care Services

\_\_\_\_\_  
 Date

I understand that to maintain an Assisted Living Facility license, the facility must be in compliance with all the licensing laws and regulations at all times.

This document was prepared by Residential Care Services for the Locator website.

\_\_\_\_\_  
Administrator (or Representative)

\_\_\_\_\_  
Date

**WAC 246-980-030 Can a nonexempt long-term care worker work before obtaining certification as a home care aide?**

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**WAC 388-78A-2450 Staff.**

(2) The assisted living facility must:

(e) Ensure all resident care and services are provided only by staff persons who have the training, credentials, experience and other qualifications necessary to provide the care and services;

(3) The assisted living facility must:

(d) Maintain the following documentation on the assisted living facility premises, during employment, and at least two years following termination of employment:

(i) Staff orientation and training or certification pertinent to duties, including, but not limited to:

(A) Training required by chapter 388-112A WAC;

(B) Home care aide certification as required by this chapter and chapter 246-980 WAC;

**This requirement was not met as evidenced by:**

WAC 246-980-025

Individuals exempt from obtaining a home care aide certification

(2) The following long-term care workers are not required to obtain certification as a home care aide. If they choose to voluntarily become certified, they must meet the requirements of WAC 246-980-040. The training requirements under RCW 74.39A.074(1) are not required.

(c) A person who is in an approved training program for certified nursing assistant under chapter 18.88A RCW, provided that the training program is completed within 120 calendar days of the date of hire and that the nursing assistant-certified credential has been issued within 200 calendar days of the date of hire.

Based on interview and record review, the facility failed to ensure that 1 of 1 sampled staff (Staff A) was qualified to work with vulnerable adult residents. This failure placed all 60 residents at risk for receiving care from an unqualified staff.

Findings included...

Review of the Department of Social and Health Services' (DSHS) "Dear Provider/Administrator Letter", dated 10/13/2023, showed that DSHS set training and continuing education (CE) requirements for long-term care workers (LTCW) while the Department of Health (DOH) maintained certification deadlines for LTCW. The document showed the DSHS established permanent rules related to training and CE requirements. The document showed that LTCW, who were hired or rehired on and after 02/01/2024, were required to complete the basic training no later than 120 days from the hire date and to be certified no later than 200 days from the hire date.

Review of the facility's "Job Description for Resident Assistant (RA)", dated September 2016, showed that RA's duties and responsibilities included providing personal care to residents, assisting residents with their self-medications, and administering medication under nurse delegation protocols. The document showed that the RA's education requirements included a Certified Nursing Assistant (CNA), or a Home Care Aide (HCA) Certification. The document showed that the RA's education requirements included a Registered Nursing Assistant (NAR) Certification as acceptable with proof of graduation, a copy of NAR license, and on condition that CNA license is earned within 120 days of hire.

Review of the facility's Employee Roster showed that the facility hired Staff A, NAR, RA, on 04/16/2024. Review of Staff A's employee records showed that Staff A's NAR was in active status. The records showed that on 10/30/2024, 197 days after hire, Staff A completed the DSHS Nursing Assistant Training Program. The records showed that Staff A scheduled their State Skills Competency Examination, which was a nursing assistant certification requirement, for 01/26/2025. The records showed that as of 01/13/2025, 272 days after hire, there was no documentation that showed Staff A completed and received the Home Care Aide certification or Nursing Assistant Certification.

Review of Resident 1's records showed that Staff A was delegated to administer medications to Resident 1. Review of Resident 1's January 2025 Medication Administration Record (MAR) showed that between 01/01/2025 and 01/13/2025, Staff A administered and signed off medication assistance for Resident 1 on five of 13 days.

Review of Staff A's work schedule showed that between August 2024 and January 2025, Staff A worked as Resident Assistant in the facility every week.

During an interview on 01/13/2025 at 3:15 PM, Staff A stated that they did not complete

the required skill test and written test for the nursing assistant certification. Staff A stated that after they completed the nursing assistant program in October 2024, they attempted to schedule for the skill test. Staff A stated that all the skill test dates were full. Staff A stated that they scheduled the next available skill test in January 2025. Staff A stated that they would take the written test after they passed the skill test.

During an interview on 01/13/2025 at 3:20 PM, Staff B, Executive Director stated that they were aware of the certification requirements for nursing assistants. Staff B stated that the facility required Resident Assistants on NAR status obtain the nursing assistant certification with 120 days of hire. Staff B stated that Staff A passed the deadline of the required certification.

**Plan/Attestation Statement**

I hereby certify that I have reviewed this report and have taken or will take active measures to correct this deficiency. By taking this action, THE GARDENS AT TOWN SQUARE is or will be in compliance with this law and / or regulation on (Date)\_\_\_\_\_ .

In addition, I will implement a system to monitor and ensure continued compliance with this requirement.

\_\_\_\_\_  
Administrator (or Representative)

\_\_\_\_\_  
Date