

BEFORE THE MINNESOTA
BOARD OF EXECUTIVES FOR LONG-TERM SERVICES AND SUPPORTS
STANDARDS OF PRACTICE COMMITTEE

In the Matter of
Brenda Gargano, LALD
License No. 3023

**AGREEMENT FOR
CORRECTIVE ACTION**

This Agreement is entered into by and between Brenda Gargano, LALD (“Licensee”), and the Standards of Practice Committee (“Committee”) for the Minnesota Board of Executives for Long-Term Services and Supports (“Board”) based on Minnesota Statutes section 214.103, subdivision 6(a)(2). Licensee and the Committee agree to the following:

FACTS

1. On August 25, 2021, the Board granted Licensee an Assisted Living Director (“ALD”) license.
2. Since October 31, 2021, Licensee has been the Director of Record (“DOR”) for Aspen Grove Assisted Living (HFID: 30680) (“Facility 1”), located in Chislm.
3. On October 31, 2021, the Board granted Licensee a shared assignment to serve as the DOR for Aspen Grove Alternative Senior (HFID: 37901) (“Facility 2”) located in Chislm.
4. On December 4, 2025, the Minnesota Department of Health (“MDH”) concluded a survey at Facility #2. The MDH determined that the following occurred:
 - a. A resident (“Resident #1”) of Facility #2 was hired to work as a housekeeper at facility. Resident #1’s assessment and individual abuse prevention plan lacked information regarding Resident #1 being a paid employee of the facility and what steps would be taken to minimize risk of abuse to Resident #1. Additionally, Facility #2 failed to complete a background study for Resident #1.

5. On February 13, 2026, the MDH concluded an investigation at Facility #2. The MDH determined that the following occurred:

a. An employee of Facility #2 (“Employee”) financially exploited a resident (“Resident #2”) when she used the resident’s bank card over a period of nine months for her own personal use. Between unauthorized purchases and ATM withdrawals, the Employee took almost \$10,000 of the Resident #2’s money.

b. The facility’s internal investigation, conducted by Licensee, indicated facility management was only aware of one month of unauthorized charges and were not aware of the other unauthorized charges over an eight-month period. The internal investigation determined the charges were accidental after the Employee reported that she mistakenly stored Resident #2’s bank card information on her online WalMart account. Licensee failed to complete a thorough investigation into the Employee’s misconduct and continued to allow Employee to work at Facility #2.

CORRECTIVE ACTION

The Committee determined that the conduct described in paragraph 3 above, does not comply with Minnesota Rules 6400.7095, subparts 1.I. and 1.J., and necessitates the following corrective action as described below.

6. **Education.** Licensee shall arrange to enroll in, and complete, no less than eight (8) hours of education, which includes at least two (2) hours on each of the following topics: (1) professionalism and ethics, (2) conducting comprehensive internal investigations into employee misconduct, and (3) properly handling complaints and grievances. This education shall not count toward the continuing education requirements provided in Minnesota Rule 6400.7020. Licensee must obtain preapproval from the Committee for the course(s) that Licensee selects.

To secure preapproval, Licensee shall submit to the Committee a course description, including course objectives and the instructor's name and applicable credentials. Licensee shall complete the courses within six (6) months of the date of the Order. Successful completion of the course(s) shall be determined at the sole discretion of the Committee and verified by Licensee's submission of official certificates indicating completion of the preapproved course(s). Licensee shall be responsible for any expenses associated with this education.

OTHER INFORMATION

7. Upon Licensee's satisfactory completion of the corrective action referenced in paragraphs 5 above, the Committee agrees to dismiss the complaint(s) concerning the matters referenced in paragraph 4. The Committee shall be the sole judge of satisfactory completion. The Committee may reopen this complaint if it receives newly discovered information that was not available to the Committee during the initial investigation or if the Committee receives a new complaint that indicates a pattern of behavior or conduct.

8. If Licensee fails to complete the corrective action satisfactorily, the Committee may, at its discretion, reopen the investigation and proceed according to Minnesota Statutes sections 144A.19 to 144A.37 (the Board's Practice Act) and chapters 214 and 14. Licensee agrees that failure to complete the corrective action satisfactorily is failure to cooperate under Minnesota Rules 6400.7905, subpart 1.U. and may subject Licensee to disciplinary action by the Board.

9. Licensee is self-represented in this matter. The Committee was represented by Alex Mountain, Assistant Attorney General.

10. This agreement shall become effective upon execution by the Board's Executive Director and shall remain in effect until the Committee dismisses the complaint, unless the

Committee receives additional information that renders corrective action inappropriate. Upon receiving such information, the Committee may, at its discretion, proceed according to Minnesota Statutes sections 144A.19 to 144A.37 (the Board's Practice Act) and chapters 214 and 14.

11. This agreement is not disciplinary action. See Minnesota Statutes section 214.103, subdivision 6. However, this agreement is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5.

12. Licensee hereby acknowledges having read and understood this agreement and having voluntarily entered into it. This agreement contains the entire agreement between the Committee and Licensee, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this agreement.

LICENSEE

Brenda Gargano LALD
BRENDA GARGANO, LALD

Dated: 5/24/26

STANDARDS OF PRACTICE COMMITTEE

Stephen Jobe
STEPHEN JOBE
Executive Director

Dated: 5/27/2026