

HCBS Final Rule Evidentiary Package

Bethany on the Lake



Setting information

Setting name: Bethany on the Lake	ID # 830600
Street address: 1020 Lark Street Alexandria, MN	Phone: (320)763-2181
Setting website, if applicable: Bethany on the Lake (https://monarchmn.com/bethany-on-the-lake)	Date of site visit: 5/30/2018

Waiver service type

Waiver service	Service type:
<input type="checkbox"/> Alternative Care (AC) <input checked="" type="checkbox"/> Elderly Waiver (EW) <input type="checkbox"/> Brain Injury (BI) <input type="checkbox"/> Community Access for Disability Inclusion (CADI) <input type="checkbox"/> Community Alternative Care (CAC) <input type="checkbox"/> Developmental Disabilities (DD)	Adult Day Service

Reason for heightened scrutiny

Prong type	Category	Type of setting
Prong 1 Located in a Public or Private Institution	Name of Institution	Name of Institution Bethany on the Lake (Nursing facility is also called Bethany on the Lake)

General summary

Bethany on the Lake is an adult day program located in Bethany on the Lake nursing facility in Alexandria, MN. The setting is on Lake Winona in Alexandria, MN, a small town located in west central Minnesota in Douglas County. The last census in 2010 reported a population of 11,070 people. Bethany on the Lake is located less than 2 miles from downtown Alexandria. The senior community is managed by Monarch Healthcare Management.

The day program serves approximately 23 people with one person using Elderly Waiver services. The number of people attending the program varies from day to day. The lowest day is 6 and the highest is 12 to 13 people per day.

Adult day provider standards/qualifications

Licensure requirements and other state regulations for adult day services clearly distinguish these services/settings from institutional licensure or regulations.

Adult day services provided in center-based facilities are directly licensed by the Department of Human Services. Adult day services serve functionally impaired adults on a regular basis for periods of fewer than 24 hours during the day in a setting that is not a residence.

Adult day service definitions that support the setting requirements

Minnesota’s Community Based Services Manual (CBSM) provides the following requirements for Adult day services: [Community Based Services Manual information on Adult Day](http://www.dhs.state.mn.us/main/id_002205#)

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Adult day services must:

- Be based on the person’s assessed needs
- Be directed toward the achievement of specific outcomes identified in the person’s support plan
- Offer opportunities to participate in community groups (e.g., senior citizen centers or clubs, generic service organizations, adult education)
- Provide age-appropriate tasks and materials
- Provide community integration opportunities to enhance the person’s social and physical interaction with people without disabilities
- Provide the supports necessary either to maintain or improve the person’s ability to care for him or herself.

Prong 1 and Prong 2 settings

Meaningful distinction between the facility and HCBS setting

States must submit strong evidence that the setting presumed institutional has the characteristics of a HCBS setting and not an institutional setting.

Determination	Summary
<input checked="" type="checkbox"/> Met <input type="checkbox"/> Unmet <input type="checkbox"/> Not applicable	<p>Interconnectedness between the facility and the setting in question, including administrative or financial interconnectedness, does not exist or is minimal.</p> <p>There is a designated supervisor that oversees and manages the adult day program. She does all the day to day operations such as scheduling, billing compliance and regulations. The adult day also has their own registered nurse. The campus has an executive director and a director of nursing that are in charge of the whole campus.</p>

<input checked="" type="checkbox"/> Met <input type="checkbox"/> Unmet <input type="checkbox"/> Not applicable	<p>To the extent any facility staff are assigned occasionally or on a limited basis to support or back up the HCBS staff, the facility staff are cross-trained to meet the same qualifications as the HCBS staff; (staff training materials that speak of the need to support individuals' chosen activities), (person centered planning) (the staff is trained specifically for home and community-based support in a manner consistent with the HCB settings regulations.)</p> <p>There are no staff that work at the adult day that also work at the nursing facility.</p>
<input checked="" type="checkbox"/> Met <input type="checkbox"/> Unmet <input type="checkbox"/> Not applicable	<p>Participants in the setting in question do not have to rely primarily on transportation or other services provided by the facility setting, to the exclusion of other options; (Describe the proximity to avenues of available public transportation or an explanation of how transportation is provided where public transportation is limited.)</p> <p>There is a public transportation company called Rainbow Rider that is used for community based activities during the program day.</p>
<input checked="" type="checkbox"/> Met <input type="checkbox"/> Unmet <input type="checkbox"/> Not applicable	<p>The setting provides HCBS services in a space that is distinct from the space that institutional services are provided.</p> <p>The adult day is provided in a distinct space on a separate floor than the nursing facility. The adult day program is not connected to the nursing facility except by going up or down a floor. The adult day is primarily in one room and uses another for activities.</p> 

Community engagement opportunities and experiences



The setting offers people the option of experiences in the community during the day program. People's interests and preferences are assessed when they begin the program, and discussed by the participants during the Learning Circle discussions that happen several times per month. People are given calendars each month with their options. Some examples of planned community based activities include:

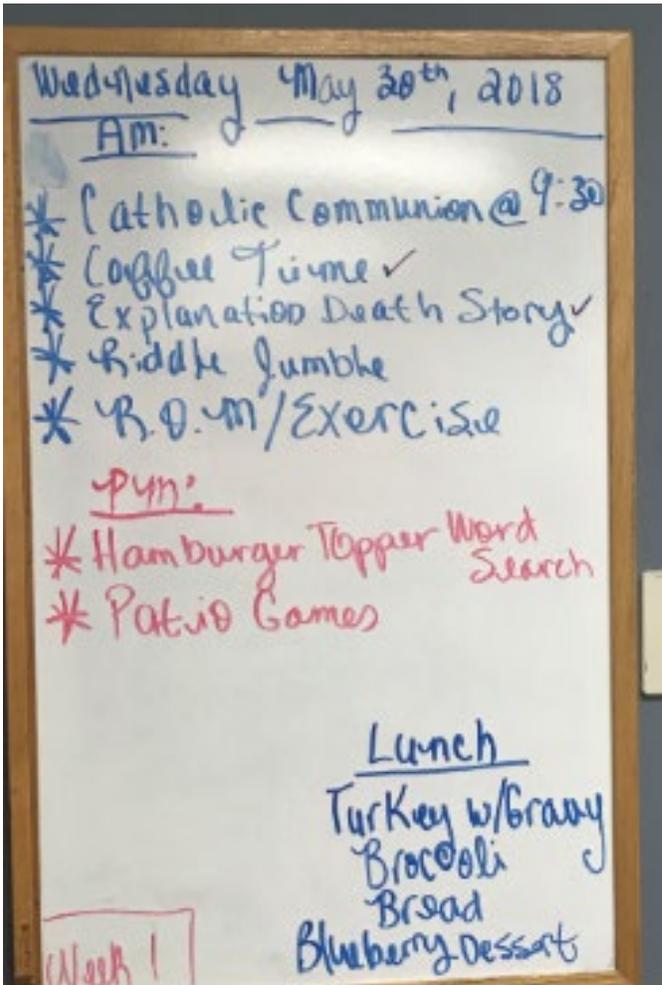
- Senior Center Pancake Luncheon
- Country Blossoms Farm visit trips to a local café for coffee and treats
- Billiards at the senior center
- Coffee social at a local church
- Church bazaars
- Community bingo.

The people who attend the adult day program enjoy riding around the community in the golf cart. They have built a strong relationships with the neighbors in the blocks surrounding the setting. The neighbors often flag them down and ask them to stop and chat. The people in the adult day program know the names of the neighbor's pets including a St. Bernard and a cat who love to be the center of attention when they visit. The neighborhood and the people riding the golf cart look forward to this time of visiting and friendship.

There are times when the community joins the setting for special occasions like the Mother's Day Brunch and their Veteran's Day program.

Bethany on the Lake provides many onsite activities such as crafts, games, bingo, exercise classes and religious services.

The setting lends itself well for people to go out and sit in the nature and wildlife comes to visit. People were observed sitting outside watching the ducks near the lake. The ducks came close to the setting.



People walk around the building or relax outside if they wish.

People attending the program have the option to go to activities and events around the campus. There are calendars notifying them of upcoming events both at the adult day and at the other areas of the campus. In addition, there is a board where people can see what is happening in the program for the day, as well as the menu. See picture to the right. They also had a wall where brochures and community flyers were placed to let people know of interesting community activities.

HCBS characteristics

<p>This section is a summary of the individual HCBS characteristics required in the HCBS rule. The findings for each characteristic are identified through the setting attestation documentation, on-site observation or both.</p>	
HCBS Rule requirement	Compliance status (Please select)
<p>The setting provides opportunities for people to seek employment and work in competitive integrated settings.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input checked="" type="checkbox"/> Observation made during on-site visit</p> <p>Though no one that attends the adult day is currently working, they have had people who volunteered in the past. The setting will accommodate people's schedules to allow them to work or volunteer according to the supervisor.</p>	Compliant
<p>The setting is physically accessible to the individual.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input checked="" type="checkbox"/> Observation made during on-site visit</p> <p>The setting is accessible to people and no barriers were observed that would prevent easy navigation around the building.</p>	Compliant
<p>The setting provides people opportunities to access and engage in community life.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input checked="" type="checkbox"/> Observation made during on-site visit</p> <p>See Community Engagement section. People are able to access and engage in the community while at the day program.</p>	Compliant
<p>The setting ensures people's right to privacy.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input checked="" type="checkbox"/> Observation made during on-site visit</p> <p>Setting submitted the <i>Minnesota</i> Home Care Bill of Rights. They use this document to inform people and train the staff of a person's right in this area.</p> <p>Observed staff speaking with someone privately and away from the group to protect their privacy.</p>	Compliant

Compliant



The setting ensures people's dignity and respect.

- Compliant documentation submitted with attestation
- Observation made during on-site visit

Setting submitted the Minnesota Home Care Bill of Rights. They use this document to inform people and train the staff of a person's right in this area.



The setting has a separate area down the hall where people can keep extra clothes and incontinence products. They keep them there in an effort to make sure people aren't embarrassed when they need these items. The room is on the way to the restroom and protects people's dignity.

<p>The setting ensures people’s freedom from coercion and restraint.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input type="checkbox"/> Observation made during on-site visit</p> <p>Setting submitted the Minnesota Home Care Bill of Rights. They use this document to inform people and train the staff of a person’s right in this area.</p>	<p>Compliant</p>
<p>The setting optimizes individual initiative, autonomy and independence in making life choices, including daily schedule and with whom to interact.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input checked="" type="checkbox"/> Observation made during on-site visit</p> <p>When interviewing people, they said they choose what activities they wish to participate in, and that staff try to plan activities based on the interests of the people attending. One of the people interviewed was a WWII veteran, and he said they often have activities related to history, which he enjoys.</p>	<p>Compliant</p>

Pictures of the HCBS setting



Decorations for Veteran's Day and the lake view from the adult day program.



Public comment summary

The Minnesota Department of Human Services (DHS) did not receive public comments for this setting.

DHS sought public comment for 30 days (Feb. 6-March 7, 2019) before submitting settings to the Centers Medicare & Medicaid Services (CMS) for heightened scrutiny.

We sought public comments using the following methods:

- Evidentiary packages posted online on the [Home and Community Based Services Rule transition plan page](#)
- Evidentiary packages specific to each setting posted in a common area of the setting
- Notice of public comment period via [Feb. 6, 2019, eList announcement](#)
- Notification to lead agencies via regional resource specialists
- Notification to providers via email
- Notification to managed care organizations and Area Agencies on Aging (AA) via email
- Notification to long-term care ombudsman office via email
- Disability Hub MN virtual insight panel.

Minnesota's recommendation

Date of recommendation: 4/1/2019

Minnesota supports that this setting overcomes the institutional presumption and meets the requirements of a home and community-based setting. Provider is required to maintain on-going compliance with all HCBS requirements.