

HCBS Final Rule Evidentiary Package

Bridgewell Assisted Living



Setting information

Setting name: Bridgewell Assisted Living	ID # 25904
Street address: 410 West Main Street Osakis, MN 56360	Phone: 320-859-2142
Setting website, if applicable: Bridgewell Assisted Living (http://www.galeonmn.com/index.php)	Date of site visit: 5/31/2018

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)	Customized Living

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 Community Memorial Home

Note: The term people/person (resident for residential settings) refers to people receiving Medicaid HCBS waiver service

General summary

Bridgewell Assisted Living is located on the Galeon Senior Living continuum of care campus in a residential neighborhood. The campus offers independent living, two separate customized living settings, and a skilled nursing facility. Bridgewell is one of the customized living settings that offer 24 hour supervision. They currently have 14 people living there, of which 9 are using services funded by the Elderly Waiver.

The campus is located in Osakis, Minnesota. Osakis is located in the west central part of the state and is a rural area. Most of Osakis is located in Douglas county, though a small part extends into Todd county. Their population was 1,740 as of the 2010 Census.

Customized living provider standards/qualifications

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

Customized living services are provided in housing with services establishments with the service provider directly licensed as a comprehensive home care provider by the Minnesota Department of Health. Customized Living services provide an individualized package of regularly scheduled health-related and supportive services provided to a person who resides in a qualified, registered housing with services establishment.

Customized living service definitions that support the setting requirements

Customized living (CL) and 24-hour CL services include component services designed to meet the person's assessed needs and goals. Individualized CL services may include supervision, home care aide tasks (e.g., assistance with activities of daily living), home health aide task (e.g., delegated nursing tasks), home management tasks, meal preparation and service, socialization, assisting enrollees with arranging meetings and appointments, assisting with money management, assisting participants with scheduling medical and social services, and arranging for or providing transportation. If socialization is provided, it must be part of the service plan, related to established goals and outcomes and not diversional or recreational in nature.

For more details about the component services, including what is covered and distinctions between each see [Customized Living Component Service Definitions, DHS-6790H \(PDF\)](#).

(<https://edocs.dhs.state.mn.us/lfserver/Public/DHS-6790H-ENG>)

Minnesota's Community Based Services Manual (CBSM) provides the following requirements for [customized living services](#):

(http://www.dhs.state.mn.us/main/id_001787)

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>The campus has an administrator/Chief Executive Officer who reports to the board of directors. Each customized living setting has its own director (Housing Director) and own Clinical Director who is an RN and manages the home care program of business. The management of the customized living settings, including Bridgewell, have no management responsibilities in the skilled nursing facility. The skilled nursing facility has a separate Director of Nursing who does not have management responsibilities of the customized living settings.</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 HCBS settings regulations.)</p> <p>The staff at the skilled nursing facility do not work or provide services at the Bridgewell customized living setting. This was stated by both the administrator and the staff person interviewed. They both also stated that if a skilled nursing facility staff person wanted to work at Bridgewell, they would receive HCBS training as part of the Bridgewell orientation/training.</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>People living at Bridgewell have several options for transportation. Rainbow Rider is the public transit option in their area. Information about this service was observed posted on the bulletin board. Bridgewell also has accessible busses and there are community volunteer drivers that drive the buses and provide rides to people at Bridgewell. Since Bridgewell is a customized living setting that offers 24 hour staffing,</p>

many of the people have family transport them. Staff at Bridgewell arrange all of the transportation for people, as needed.

The setting provides HCBS services in a space that is distinct from the space that institutional services are provided.

Bridgewell, shown inside the yellow box below is connected to the Wellness Center, outlined in blue. This wellness center is open to the public as well. Between them, you can see a green star which shows the hallway that connects the two. The Wellness Center is attached to the skilled nursing facility outlined in red. Bridgewell is a separate building from the skilled nursing facility.

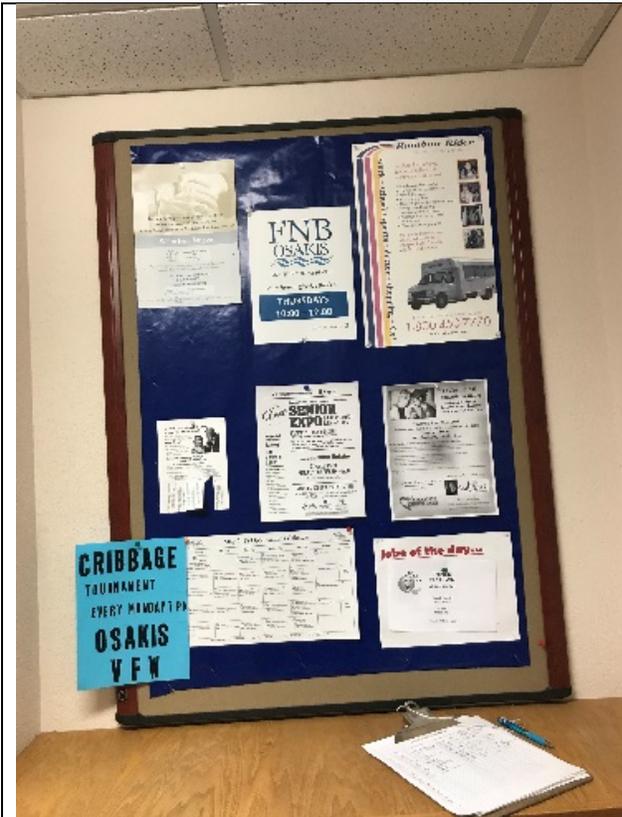


- Met
- Unmet
- Not applicable

This photo shows the open doors on the right to the nursing facility. The white door on the left is the entrance to Bridgewell.



Community engagement opportunities and experiences



Bridgewell provides opportunities for people to experience events and activities in the community. They are asked about their activity interests at move in, and at monthly tenant meetings. They are made aware of their choices through calendars, television screens throughout the building, bulletin boards, and table tents on the tables when they eat. Because this is a setting that offers 24 hour customized living service, people are also verbally reminded of activities by staff the day of the activity. In addition to the activities planned for Bridgewell, they can choose from activities with the skilled nursing facility, independent living building or the other customized living setting. Staff accompany people due to safety issues. Some examples of community activities that have been offered are:

- Attending Osakis Days
- Boat rides
- Fishing
- Going to garage sales
- Holiday lights tours
- Trips to Tip Top, a local restaurant
- Community bingo
- Trailer rides.

People also experience the community with their families and friends when they come to take them on car rides, lunches/dinners, family events, or other activities of interest. People interviewed said they like to go with their children and spend time with them.

There is also a daycare that brings children to visit the campus, as well as various musicians that come to perform.

The setting has activities on site as well, such as arts and crafts, bingo, religious services and events on the patio. Some people enjoy gardening during the summer. The setting also hosts an event where people can wear their prom or wedding dresses or just show them to others.



This setting has an expansive wellness center that is open to the public. People come into the setting to exercise and use the pool.

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>	
<p>HCBS Rule requirement</p>	<p>Compliance status (Please select)</p>
<p>Each person at the setting has a written lease or residency agreement in place providing protections to address eviction processes and appeals.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input type="checkbox"/> Observation made during on-site visit</p> <p>The setting provided a HCBS compliant lease agreement as documentation through the provider attestation process.</p>	<p>Compliant</p>
<p>Each person at the setting has privacy in his/her sleeping or living unit including a lockable door.</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>Locks were observed on each apartment door at Bridgewell. When asked, people interviewed stated that they felt staff respected their privacy. Because it's a customized living setting that offers 24 hour supervision, many people don't use the locks for health and safety reasons. Setting will implement rights modifications form for those who need a modification.</p>	<p>Compliant</p>
<p>The setting facilitates that a person, <i>who shares a bedroom</i>, is with a roommate of their choice.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input type="checkbox"/> Observation made during on-site visit</p> <p>This is not applicable since this setting has no shared units.</p>	<p>Compliant</p>

<p>The setting provides people with the freedom to furnish and decorate their bedroom and living unit within the lease or residency agreement.</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>People’s units were observed to be decorated with personal items such as photos and memorabilia. In addition, one person interviewed said they were able to “put up whatever we want.”</p>	<p>Compliant</p>
<p>The setting provides people the freedom and support to control their daily schedules including access to food at any time.</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>Staff interviewed said that if a person misses a meal, a plate will be saved if they request it. Also, a person may request a snack at any time and it will be provided to them. In addition, people have kitchens for food storage in their units. When asked about whether they can do things like wake up when they want, and choose activities, both people responded “yes”.</p>	<p>Compliant</p>

<p>The setting allows people to have visitors at any time.</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>Visitors were observed to be coming and going from the setting. A visitor was observed at the desk in the lobby connecting to Bridgeview signing in. People interviewed said they can have visitors when they want.</p>	<p>Compliant</p>
<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>Staff indicated that there aren't any people who live at Bridgewell who are still employed or that volunteer. However, they said that if a person did want to work, they would make accommodations to their services to support the person's right to work or volunteer. People interviewed said they didn't want to work.</p>	<p>Compliant</p>
<div data-bbox="203 1018 727 1491" data-label="Image"> </div> <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>This setting is physically accessible to people. No barriers were observed. Bathrooms were accessible with grab bars and railings. People interviewed said they felt they could get around their apartments and the building without trouble.</p>	<p>Compliant</p>

<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 use the on-site wellness center for occupational, speech and physical therapy. However, they are free to see their own providers for these services as well. They are told this at move in and as needs arise for new services.</p>	<p>Compliant</p>
<p>The setting supports the person’s control of personal resources.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input type="checkbox"/> Observation made during on-site visit</p> <p>This is not applicable. The attestation states and the staff confirmed that this setting does not provide money management.</p>	<p>Compliant</p>
<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>They submitted the Minnesota Home Care Bill of Rights. They use this document to inform people and the staff of a person’s right in this area.</p> <p>Staff were observed knocking on apartment doors and asking permission to enter.</p>	<p>Compliant</p>
<p>The setting ensures people’s dignity and respect.</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>They submitted the Minnesota Home Care Bill of Rights. They use this document to inform people and the staff of a person’s right in this area.</p> <p>Observed staff person spending extra time with a person who seemed to be confused about where to go and she was upset. Staff spent time talking with her and were very respectful.</p>	<p>Compliant</p>

<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>They submitted the Minnesota Home Care Bill of Rights. They use this document to inform people and the staff of a person’s right in these areas.</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>They submitted the Minnesota Home Care Bill of Rights. They use this document to inform people and the staff of a person’s right in this area.</p> <p>When asked if they felt they had choices about their schedule, both people interviewed said they did. Staff interviewed said if someone doesn’t want to participate in something “It’s their life, it’s up to them”.</p>	<p>Compliant</p>

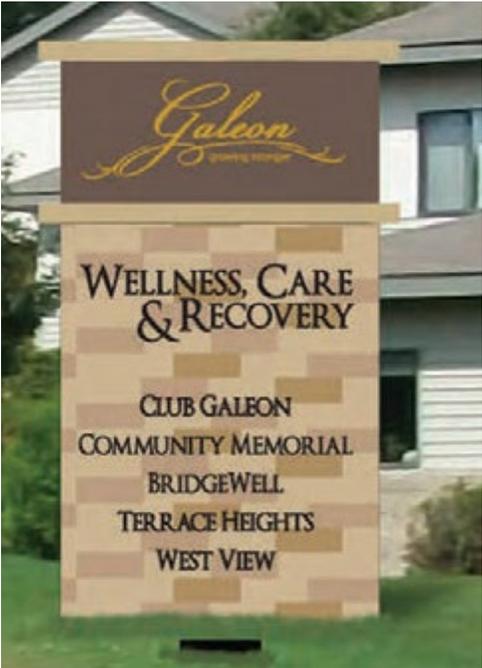
Pictures of the HCBS setting



Sign outside of the campus



Patio area



Sign outside of campus

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.