

# HCBS Final Rule Evidentiary Package

## Cannon Valley Suites



### Setting information

Setting name: Cannon Valley Suites	ID # 23183
Street address: 900 Cannon Valley Drive Northfield, MN 55057	Phone: 507-645-9511
Setting website, if applicable: <a href="https://northfieldretirement.org">Northfield Retirement Community</a> ( <a href="https://northfieldretirement.org/living-services/living-options#cannonvalleysuites">https://northfieldretirement.org/living-services/living-options#cannonvalleysuites</a> )	Date of site visit: 7/24/2018

### 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	Northfield Care Center

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

## General summary

Cannon Valley Suites is a customized living setting located in Northfield, MN. Northfield is located in Southeastern Minnesota, mostly in Rice County, but a small portion of the city lies in Dakota County. The population was listed as 20,007 during the 2010 census. Cannon Valley is located on the continuum of care campus of Northfield Retirement Community. The campus offers independent living, customized living, customized living with 24 hour staffing, short term rehabilitation, and skilled nursing.

Cannon Valley has 22 apartments, and at the time of the attestation, the setting had 8 people utilizing an Elderly Waiver for services.

## 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:

[CBSM page on Customized Living](#)

([http://www.dhs.state.mn.us/main/id\\_001787#](http://www.dhs.state.mn.us/main/id_001787#))

## Prong 1 and Prong 2 settings

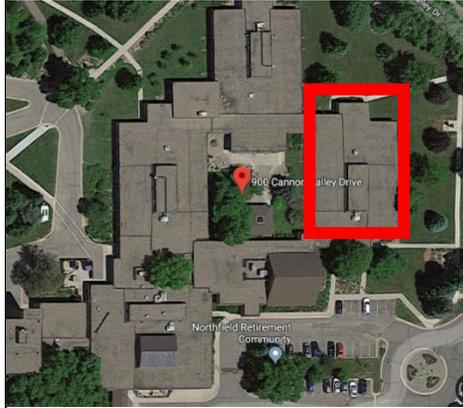
### Meaningful distinction between the facility and HCBS setting

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><b>Interconnectedness between the facility and the setting in question, including administrative or financial interconnectedness, does not exist or is minimal.</b></p> <p>There is a chief operating officer that oversees the entire campus. However, the customized living has its own management and nursing staff that are separate from the nursing facility. In addition, there are staff who plan activities for the customized living only, and the nursing facility has their own staff who plan for the nursing facility.</p>

<input checked="" type="checkbox"/> Met <input type="checkbox"/> Unmet <input type="checkbox"/> Not applicable	<p><b>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;</b> (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>The staff at the nursing facility do not work or provide services at the customized living setting except very occasionally. This was stated by both the administrator and the staff person interviewed.</p> <p>Any nursing facility staff person who is scheduled to work at the customized living setting would receive HCBS training as part of the orientation/training.</p>
<input checked="" type="checkbox"/> Met <input type="checkbox"/> Unmet <input type="checkbox"/> Not applicable	<p><b>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;</b> (Describe the proximity to avenues of available public transportation or an explanation of how transportation is provided where public transportation is limited.)</p> <p>Cannon Valley Suites has many different transportation options for people. The setting has its own vans, but people can access a Dial-A-Ride service, services such as A-Tran, Devoted Hearts Transport, Northlink Mobility and several others. They can use Allina Transport or AMV for medical appointments.</p> <p>The setting has a list of the transportation providers, the contacts name, the phone numbers and rates for people to use in making transportation decisions.</p> <p>Staff assist in setting up transportation if needed.</p>

- Met
- Unmet
- Not applicable

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



Cannon Valley Suites is indicated by the red square shown here on the aerial view. The doors connecting the customized living setting to the nursing facility are shown below.



Wayfinding signage

## Community engagement opportunities and experiences



Cannon Valley suites offers many opportunities for people to stay engaged in their communities and have new experiences. People are asked about their interests when they

move in, and they are also interviewed one on one about what kinds of activities they would like to see offered. In addition, there are monthly resident meetings where people can give input on desired new activities and feedback on activities they attended. People are informed of their activity options via a calendar that they distribute, as well as post in the setting. Activities are also discussed at mealtimes as a reminder and staff will also knock on doors to remind people of offerings. The setting offers a special channel on their cable that give them information about activities as well. People are able to access the activities going on across the campus in addition to the ones offered in their setting. Some community experiences offered are:

- Baseball games
- Dining at restaurants
- "Wine and Canvas"
- Church luncheons and religious services
- Visits to the local college
- Shopping
- Movies at the theatre
- Fairs and parades
- Trips to see their old farms.

People also access the community with friends and family. Some activities they attend are:

- Family events and celebrations
- Trips to family cabins
- Concerts
- Out to eat and shopping.

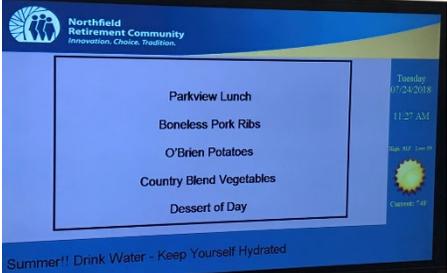
People in the setting will go with one another on walks across the campus, to the library or other places of interest on the campus.

Onsite activities include bingo, card and dice games, exercise, religious services, music and coffee time.

At the time of the site visit, there were goats outside eating the weeds, so people were enjoying going out to see them.

# HCBS characteristics

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.	
HCBS Rule requirement	Compliance status (Please select)
<p><b>Each person at the setting has a written lease or residency agreement in place providing protections to address eviction processes and appeals.</b></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 provided a HCBS compliant lease agreement as documentation through the provider attestation process. People interviewed said they had a lease for their apartments</p>	Compliant
<p><b>Each person at the setting has privacy in his/her sleeping or living unit including a lockable door.</b></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 all of the apartment doors in the setting. People interviewed said they can lock their door if they want privacy. When asked if staff respected their privacy one person responded “Oh yes, definitely!”</p>	Compliant
<p><b>The setting facilitates that a person, <i>who shares a bedroom</i>, is with a roommate of their choice.</b></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. There are no shared bedrooms at this site, except for partners/spouses or roommates of their choice.</p>	Compliant
<p><b>The setting provides people with the freedom to furnish and decorate their bedroom and living unit within the lease or residency agreement.</b></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 were interviewed in their apartments, and their units were observed to be decorated with personal items such a photos and</p>	Compliant

<p>memorabilia. People interviewed said they were able to furnish their apartments as they wished. One person said “Well, just look at my pictures all over!” And another person said they were proud of how their apartment looks.</p>	
<p><b>The setting provides people the freedom and support to control their daily schedules including access to food at any time.</b></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 asked if they decide what their schedule looks like, they answered yes. One person added “There is nothing that anyone says I must do. I decide”. One person said he likes to sleep in and staff accommodate that. They said “Even if breakfast is over, they will go get me a breakfast”. When asked about being able to get food at any time, one person said “Oh yes, they will always put something together for us”. In the common area, there is a refrigerator and microwave with snacks in it for residents to access any time they want. There is a community café if they wish to eat there, and a gift shop on campus that sells food as well. The menu is shown on monitors on the campus.</p>	<p>Compliant</p>
<p><b>The setting allows people to have visitors at any time.</b></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>During the interviews, people interviewed said they could have visitors at any time. One person said, “Sure, we can have visitors anytime.”</p>	<p>Compliant</p>
<p><b>The setting provides opportunities for people to seek employment and work in competitive integrated settings.</b></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 there was none of the people living in the setting were working at this time. However, if they were to desire to work, staff would be flexible to support them and their schedule. People interviewed said they did not wish to work at this time.</p>	<p>Compliant</p>

<p><b>The setting is physically accessible to the individual.</b></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. Accessible features such as grab bar in the bathrooms were observed. When asked if the setting was accessible, she said “Yes, I can go anywhere”. The setting offers amplifiers for the religious services on site.</p>	<p>Compliant</p>
<p><b>The setting provides people opportunities to access and engage in community life.</b></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. There are many opportunities for people to experience the community. There are many onsite services offered such as OT, PT, Audiology, doctors who come on site, and dental services. However, people know they can choose their own providers. This is detailed in their lease. When asked if they can use the doctors and health professionals of their choice, one person answered “Yes, they will even set them up and help us with rides”.</p>	<p>Compliant</p>
<p><b>The setting supports the person’s control of personal resources.</b></p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input type="checkbox"/> Observation made during on-site visit</p> <p>Not applicable. This setting does not offer money management services.</p>	<p>Compliant</p>
<p><b>The setting ensures people’s right to privacy.</b></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>Compliant</p>

<p>Staff were observed knocking before entering apartments. Staff were also observed closing the door while having a conversation about personal cares with someone. People interviewed said they felt that their privacy was respected.</p>	
<p><b>The setting ensures people’s dignity and respect.</b></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 were observed to be calling people by their names and listening to them intently. One person said that “We are all family here. That is how the staff and other people treat each other”. Another person stated similarly “We are all included as one big family. They couldn’t do this any better”.</p>	<p>Compliant</p>
<p><b>The setting ensures people’s freedom from coercion and restraint.</b></p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input type="checkbox"/> Observation made during on-site visit</p> <p>Staff are trained on the Minnesota Home Care Bill of Rights and the Minnesota Vulnerable Adults Act. A copy of the Home Care Bill of Rights is also given to people to inform them of their right to be free from coercion and restraint.</p>	<p>Compliant</p>
<p><b>The setting optimizes individual initiative, autonomy, and independence in making life choices, including daily schedule and with whom to interact.</b></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 interviewed said they felt like they made their own decisions. One person said, “I like having options. If there is something going on, I am there”. The conversations with people living in the setting confirmed that people are allowed to make their own choices.</p>	<p>Compliant</p>

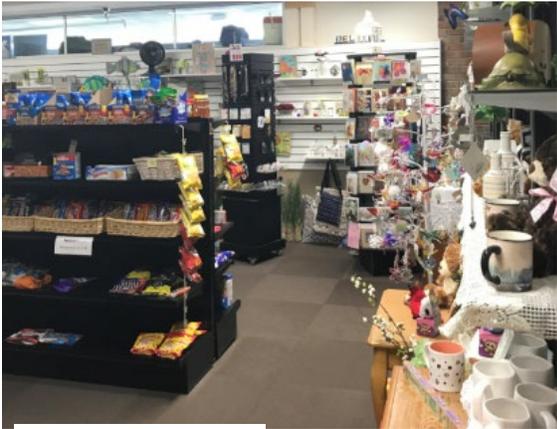
# Pictures of the HCBS setting



*The chapel*



*One of the apartments*



*The gift shop*

## Public comment summary

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

DHS sought public comment from April 30, 2019, to June 9, 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 [May 10, 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: 7/1/2019**

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.