

HCBS Final Rule Evidentiary Package

Cerensity On Humboldt



Setting information

Setting name: Cerensity On Humboldt	ID # 30462
Street address: 514 Humboldt Avenue Saint Paul, MN 55107	Phone: 651-220-1718
Setting website, if applicable: Cerensity on Humboldt (https://www.cerensityseniorcare.org/cerensity-senior-care-humboldt-st-paul-mn)	Date of site visit: 2/27/2018

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 checked="" 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 Cerenity Care Center

General summary

Cerenity on Humboldt is a customized living facility in St. Paul, MN. St. Paul is located in south central MN and has a population of approximately 309,000. Cerenity on Humboldt offers Customized Living services, including memory care, skilled nursing and rehabilitation services in 116 apartments. Various funding sources, including waiver funding and private pay are accepted. They are in an urban area, but are located on a 15-acre park-like campus, which also includes the Care Center. They are located in a residential neighborhood, close to schools, churches and businesses as well as a center for the arts.

There are 116 apartments total in the customized living setting. They are currently serving 94 people, and 61 of those people are people who are receiving waived services. The waivers utilized are the CADI and Elderly waivers.

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#)

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>Cerenity on Humboldt is owned by Cerenity Senior Care. There are separate housing directors for the nursing facility and the customized living setting.</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 is no sharing of staff between the nursing facility and customized living.</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>The customized living has a full time social worker that helps arrange transportation for people, as requested. The setting has a van, and people can arrange rides with Metro Mobility, and UCare for medical transportation. The people who live there indicated that they knew that they could ask the social worker for help scheduling transportation. Family members provide transportation as well. Transportation phone numbers are given to people via their Resident Handbook. People interviewed indicated that they just contact the social worker if they need rides scheduled</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>Cerenity on Humboldt has its own separate entrance from the nursing facility. There is separate signage for each building. They are connected by a hallway, which starts at the Customized Living, then goes through an adjacent building before it connects to Cerenity Care Center. The services are provided in distinctly different areas.</p>

Community engagement opportunities and experiences

Cerenity in Humboldt offers a wide range of activities to allow people receiving services to stay connected to their communities. People are informed of these options through calendars, which are distributed monthly. Daily calendars are also posted to allow people to see which activities are planned for the day, and staff will remind people prior to activities taking place. There is a full time activities coordinator to help plan activities. Ideas and interests for community engagement are discussed at intake and at Resident Council meetings. Some examples of past community experiences include:

- Visits to local museums
- Plays at the Guthrie Theatre
- Fishing
- Shopping
- Seeing musicals at local theatres
- Shopping trips
- Twins baseball games
- Drives to see holiday lights and fall leaves
- Visits to churches
- Barbeques
- Music in the park.

Family members frequently pick people receiving services up and take them to various activities including:

- Doctors' appointments
- Eating out at local restaurants
- Family gatherings
- Shopping.

Examples of some of the daily activities offered at Cerenity on Humboldt include opportunities to exercise, play Bingo, card and dice games, watch movies, "Wine and Chocolate" and relaxation techniques.

People can also walk freely about the campus and enjoy the park like environment, visit with family or friends on the outdoor patio or gather in many of the common areas.

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
<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>Cerinity on Humboldt submitted a lease that is compliant with the requirements of the HCBS rule. People interviewed indicated that they had a lease.</p>	Compliant
<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>Each apartment has a lock on the door. People interviewed and staff both confirmed that the people receiving services have their own key. Also, when interviewed, people living there they feel that staff respect their privacy.</p>	Compliant
<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>There are no shared apartments on site, with the exception of married couples who choose to live in the same apartment.</p>	Compliant

<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>The apartment units observed during the site visit had personal furnishings such as pictures, decorations and items that were the person’s own. The people interviewed said they decorated as they wished.</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>There are 3 meal times per day. If a person gives prior notice to missing a meal, their plate can be covered, saved and given to them upon their return. There are not kitchenettes in the apartments but there are refrigerators in the community area. People can ask staff for snacks if they are hungry, or store food in their apartments if they choose to purchase their own refrigerator. People interviewed indicated that they feel they have control. One person commented “I do what I want.”</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 in the building during the on-site visit. People interviewed indicated that they knew they could have visitors at any time.</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 type="checkbox"/> Observation made during on-site visit</p> <p>People receiving services are asked at move in if they are interested in work or if they are currently working. Staff interviewed indicated that for people who work or volunteer they are supported by adjusting medication times, personal care schedules and other accommodations such as bag breakfasts for those who need to leave early for work.</p>	<p>Compliant</p>

<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>While on site, no barriers to access any area of the building were noted. Apartments were accessible, including the bathrooms. When asked if they are able to easily around setting they indicated that they could.</p> <p>People who are receiving services leave the building at will unless it is indicated in their support plan that it would pose safety risk, such as some of the people who living in the memory care unit. In this case, the person asks the staff to escort them where they need to go. The memory care unit does have locks on the door to prevent unsafe exit from the setting.</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>This setting offers on-site medical, dental, psychology, vision and hearing services as well as occupational and physical therapy. However, people are informed at move in, through their Resident Handbook and as new needs arise that they can access their own community providers. Many people use their own providers</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>Administration indicated that they don’t provide money management for the people who live in the setting, and that people either control their own money or have appointed a Power of Attorney to do so.</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>Staff were observed to be cognizant of people’s privacy, and were seen knocking on doors and waiting for a response before entering the apartments. I observed a staff person going in to a person’s apartment with what looked like supplies for personal cares, and they shut the door behind them to afford them privacy.</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>Staff interviewed showed respect for the person and their dignity. One staff said “This is their home and their life” when asked about any availability of choices for people.</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>The setting policies state that restraints or restrictive devices are not utilized at the setting. Vulnerable Adult policies are in place and staff receive training on this topic.</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>Both staff and people receiving services interviewed said that people that live here control their own schedules. There are no curfews or times when people are required to participate in certain activities. They said they can choose to participate in activities or refuse. People were observed socializing in groups and also participating in solitary pursuits like reading.</p>	<p>Compliant</p>

Pictures of the HCBS setting

Pictures of the hallway and of the chapel



Pictures of the view from above the lounge area from the upper floor

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.