

HCBS Final Rule Evidentiary Package

Ecumen Detroit Lakes Day Club



Setting information

Setting Name: Ecumen Detroit Lakes Day Club	ID # 1081523
Street Address: 1415 Madison Avenue, Detroit Lakes MN 56501	Phone: 218-844-7139
Setting website, if applicable: Ecumen Day Club (http://www.ecumendetroitlakes.org/programs)	Date of site visit: 5/8/2018

Waiver service type

Waiver service	Service type:
<input checked="" 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)	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 Emmanuel Nursing Home, 1415 Madison Ave, Detroit Lakes, MN, 56501

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

General summary

Ecumen Detroit Lakes Day Club is a program offered in a residential neighborhood, on the Ecumen Detroit Lakes community of care campus. Ecumen Detroit Lakes Day Club provides physical, social and spiritual care, to older adults and people with disabilities.

Detroit Lakes is a rural town, located in Northwestern Minnesota. Detroit Lakes' population is 9,165 per the 2016 census.

This setting reported they are serving 14 people with services funded through various pay sources, including waiver funding, veteran's services and private pay. The average number of people attending the program per day is nine. The majority of people attend the program from 11:00am -2:00pm. The setting is open Monday - Friday (8:00am-3:00pm) and night services are also available.

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](#):

http://www.dhs.state.mn.us/main/id_002205#

Adult day services must:

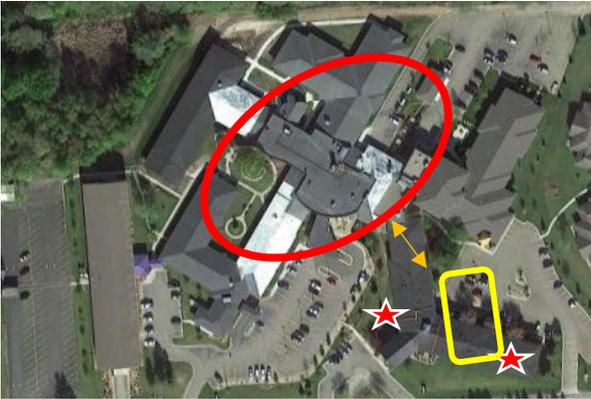
- Be based on the person’s assessed needs
- Be directed toward the achievement of specific outcomes identified in the person’s support plan
- Offer opportunities to participate in community groups (e.g., senior citizen centers or clubs, generic service organizations, adult education)
- Provide age-appropriate 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>Ecumen Detroit Lakes Day Club is a service provided by Ecumen.</p> <p>By being located on one of the larger Ecumen community of care campuses, the Adult Day Club is under the campus wide administration. This does not impact the adult day programming, as Ecumen Detroit Lakes Day Club has a designated program manager and designated staff that work in the adult day program. The setting has service specific policies that meet HCBS requirements.</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>Ecumen Adult Day Club program staff receive the general Ecumen campus new employee training. In addition, Ecumen Detroit Lakes Day Club employees receive training specifically on the adult day programming and HCBS recipient rights. This training was observed in the “Client/Employee Handbook Policy and Procedures” manual in addition to the waiver employee required training documents.</p> <p>Ecumen Adult Day Club program staff may work at other locations on or off the campus at times they are not scheduled to work at the adult day program. The nursing facility staff do not provide services or coverage in the waiver setting.</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 Ecumen Detroit Lakes Day Club does have access to the Ecumen campus van that is wheelchair accessible, as requested by the program. The adult day program also utilizes the public Detroit Lakes Transit bus and coordinates with family members for other transportation needs.</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> 

Ecumen Detroit Lakes Day Club is a designated area on the ground floor of the community wellness building on the Ecumen continuum of care campus (highlighted in yellow). The adult day program location is accessible through the main entrance of the facility and then taking an elevator down to the ground floor. An orange arrow shows the walkway/lobby that is located between the adult day location and the Emmanuel nursing facility area (circled in red). The adult day program is also accessible through two other doors on the ground level that are more utilized by participants and public transportation (indicated by red stars on the on aerial photos).



The Ecumen Detroit Lakes Day Club area is used exclusively by the adult day program, however, the adult day program has access to the campus amenities as a whole. There is an Adult Day Program sign in the hallway near the program entrance (right). Pictured left is the sign at the main campus entrance.



Community engagement opportunities and experiences

The local Detroit Lakes' community is an active social community with frequent community events. The Ecumen Adult Day Club's programming is integrated into the happenings that occur in the local area and participate in community events at various intervals, depending on the weather, but can be up to three times per week and less if the weather is not accommodating.

The Ecumen Adult Day Club does have a scheduled monthly calendar of activities, however, every morning, the people attending the program enjoy listening to the local radio station while eating breakfast and if they hear of an community event or activity that they would like to attend, the program is flexible enough that they may change the calendar for that day and do the activity the group had heard on the radio. For example, the day before the HCBS on-site visit, the temperature was unusually warm, so people attending the program choose to change their activity that afternoon to go to the local Dairy Queen for ice cream.

Other community activities people attending the adult day program have attended include classic car shows, the annual summer street fair, frequent walks to McDonald's, the local high school jazz band concerts, events in the local city park, musical performances and activities arranged by the larger community of care campus, watching the cloggers dance performance and shopping at rummage sales. People in the program enjoy going to movies, eating out, fishing and pontooning on the lake. In the winter, the program took people to the lake and viewed the famed lighted ice castle. Being a community that includes large areas of farm land, one of the activities they enjoy is going to the Steam Thresher's Reunion at Rollag, MN.

The Ecumen Adult Day Club also provides activities in the building. Staff and people in the program report that they do have the option not to attend the community events, however that does not occur frequently. Some examples of activities provided within the adult day program include baking treats, making root beer floats, playing games such as cards and bingo. The people interviewed stated they enjoyed the wood working activities the most. They build bird houses, bird feeders, and wood flower decorations. They also have raised flower beds outside the program and they are anticipating planting flowers soon.

There is a child care program that integrates their programming with the adult day program. The children in the child care come to the adult day site and utilize the outdoor area for play and interaction with the people in the adult day program. The program is aware the children are coming to the site the day after our site visit, so they are baking cookies today to have treats for the children tomorrow.

People also have the option to participate in individual activities. For example, one of the gentlemen in the program enjoys attending the local Parkinson's support group on his own. Others enjoy the campus on their motorized scooters and visiting with others throughout the campus. The men in the program report that they enjoy playing horse shoes outside as well.

Additional Ecumen campus amenities available include:

- Coffee shop and snack bar
- Art gallery
- Beauty salon and barber shop
- Conference and meeting rooms
- Friends and family celebrations
- Garden courtyards
- Gift shop
- Message services
- Technology center and library
- Chapel
- Community events.

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>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>The Ecumen Day Club does not currently have any people in the program that are employed. They do have one person who enjoys volunteering his time to be the caller at bingo in another setting on the campus. The program is flexible with his day programming to coordinate his bingo calling days into his activities. The program also provides flexible scheduling around other outside activities to meet the needs of the people.</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>	Compliant

<p>The building is accessible through the ground floor entrances or through the main entrance. If the main entrance is used, the person would be able to use the elevator to access the ground floor.</p> <p>The program setting area is a large open space that is fully accessible. The bathroom is a private area that is wheel chair accessible.</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>Activity calendars are developed monthly but are flexible enough to provide the people in the program flexibility and spontaneity as desired by the group. People interviewed report that they provide input to develop the monthly calendar and enjoy the activities the program provides.</p>	Compliant
<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 checked="" type="checkbox"/> Observation made during on-site visit</p> <p>The Ecumen Adult Day Club has a designated area for the people’s personal belongings. Purses and valuables are stored in a locked room for safety.</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>Compliant policies and practices were observed. The bathroom has a lock on the door. People’s records and files are stored in a locked, secured area.</p>	Compliant
<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>Compliant policies and practices were observed. Staff were observed providing services with dignity and respect to people.</p>	Compliant

<p>The setting ensures people’s freedom from coercion and restraint.</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Compliant documentation submitted with attestation <input checked="" type="checkbox"/> Observation made during on-site visit <p>Vulnerable Adult policies and practices were observed.</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> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Compliant documentation submitted with attestation <input checked="" type="checkbox"/> Observation made during on-site visit <p>Compliant policies and practices were observed. People attending the program have input into developing their daily schedule, including preferences for activities, snacks and participation in group or independent activities.</p>	<p>Compliant</p>

Pictures of the HCBS setting



Common sitting area



Common kitchen area



Wellness Center



Shared entrance and lobby area



Flower garden



Courtyard garden area

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.