

HCBS Final Rule Evidentiary Package

Iris Park Commons Assisted Living



Setting information

Setting name: Iris Park Commons Assisted Living

Street address: 1850 University Ave W, St Paul, MN 55104

Phone: 651-632-8801

ID # 1154556249

Setting website, if applicable:

[Iris Park Commons Assisted Living by Episcopal Homes](#)

Date of site visit: 5/23/2025

Funding and waiver service type

Waiver	Service type
☐ Elderly Waiver (EW) ☐ Brain Injury (BI) ☐ Community Access for Disability Inclusion (CADI) ☒ Private pay or other third-party insurance ☒ Pending HCBS service provider. Not yet approved for waiver funding pending heightened scrutiny determination. There are 6 people who have an Elderly Waiver and one person who has a CADI Waiver. However, they can't bill HCBS services until they are approved through the heightened scrutiny process.	Customized living service

Reason for heightened scrutiny

Prong type	Name of institution
Prong 1 Located in a Public or Private Institution	The Gardens and Episcopal Church Homes (Both Skilled Nursing Facilities)

Note: The term people/person (resident for residential settings) refers to people receiving customized living services.

General summary

Iris Park Commons is an Assisted Living with Memory Care facility located within a continuum of care campus owned by Episcopal Homes. In addition to Iris Park Commons, the campus includes senior housing apartments, a transitional care unit, hospice and two skilled nursing facilities, The Gardens and Episcopal Church Home. Episcopal Homes also owns and operates a children's day care facility on the campus.

Geographic information:

The Episcopal Homes campus is located in St. Paul, Minnesota, the state capital. St. Paul is a metropolitan area located in Ramsey County. St. Paul is the second largest city in the state, with a population of 311,527 as of the 2020 census. St. Paul and Minneapolis are commonly known as the "Twin Cities."

Iris Park Commons is located in a primarily residential neighborhood, but is close to retail stores, leisure activities, parks and churches.

Number of people served:

Iris Park Commons is a licensed assisted living facility and is licensed to serve 70 residents. They are currently serving 58 residents. Five residents have an Elderly Waiver, and one resident has a CADI waiver. The rest use private pay or other funding sources.

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 settings must have an assisted living license through the Minnesota Department of Health and meet all of the requirements and standards of the assisted living licensure, [MN Statutes, section 144G](#) or meet an exemption under [MN Statutes, section 256S.20, subd. 1](#). Customized living services provide an individualized package of regularly scheduled health-related and supportive services provided to a person who resides in a qualified setting with an assisted living license.

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 the following resource on the CBSM:

Link: [Customized living component service definitions and guide for computing time for rate-setting tools.](#)

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

Link: [CBSM: Customized living \(including 24-hour customized living\)](#)

HCBS Rule requirement	Compliance determination
Interconnectedness between the facility and the setting in question, including administrative or financial interconnectedness, does not exist or is minimal. Validation methods: ☒ Interview(s) with administrative staff. ☒ State license requirement: As required under MN Statutes, section 144G.10, "Each assisted living facility must employ an assisted living director licensed or permitted by the Board of Executives for Long Term Services and Supports." ☒ State statutory requirement: As required under MN Statutes, section 325F.722, "The person primarily responsible for oversight and management of the exempt setting, as designated by the owner, must obtain at least 30 hours of continuing education every two years of employment as the manager in topics relevant to the operations of the setting and the needs of its residents. Continuing education earned to maintain a professional license, such as a nursing home administrator license, assisted living facility director license, nursing license, social worker license, or real estate license, can be used to complete this requirement." Narrative: Per interview with the assisted living director, the customized living setting is located on a continuum of care campus. The president/chief executive officer (CEO) and the chief operating officer (COO) have oversight of the entire campus, and the senior director of skilled nursing and assisted living operations report to them. The assisted living management structure is separate from the skilled nursing facilities. Iris Park Commons has an assisted living director, who supervises their director of nursing, the nurses and the home health aides in the assisted living building. The skilled nursing facilities each have their own administrator, director of nursing, nurses and home health care aides at each facility.	Compliant

HCBS Rule requirement	Compliance determination
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. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with direct care staff. ☒ Review of training policy and procedure(s). ☒ State license requirement: As required under MN Statutes, section 144G.60, "All staff persons providing assisted living services must be trained and competent in the provision of services consistent with current practice standards appropriate to the resident's needs and promote and be trained to support the assisted living bill of rights." ☒ State license requirement: As required under MN Statutes, section 144A.44, Subdivision 1., "A client who receives home care services in the community or in an assisted living facility licensed under chapter 144G has these rights: (12) be served by people who are properly trained and competent to perform their duties;" Narrative: Per interviews with the assisted living director, assisted living staff and other validation methods listed above, Iris Park Commons and the two skilled nursing facilities do not share staff. All staff that work in Iris Park Commons receive Home and Community Based Services Rule-specific training in a manner consistent with the HCBS settings regulations. For example, training topics include person-centered planning, Assisted Living Bill of Rights, vulnerable adult reporting, and other required elements.	Compliant

Participants in the setting in question do not have to rely primarily on transportation or other services provided by the setting to the exclusion of other options. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with direct care staff. ☒ Review of transportation policy and procedure(s). ☒ State license requirement: As required under MN Statutes, section 144G.41, "Upon request of the resident, the assisted living must provide direct or reasonable assistance with arranging for transportation to medical and social services appointments, shopping, and other recreation, and provide the name of or other identifying information about the persons responsible for providing this assistance." ☒ State statutory requirement: As required under MN Statutes, section 256S.09, "Elderly Waiver case management activities provided to or arranged for a participant include: (5) assisting the participant with gaining access to needed elderly waiver and other state plan services; (6) assisting the participant with gaining access to needed medical, social, educational, and other services regardless of the funding source for the services to which access is gained." Narrative: Per the validation methods checked above, as well as interviews with the assisted living director and residents, many different means of transportation are used at Iris Park Commons. The facility's accessible bus is used for community group activities, as well as for individual rides. Some residents still drive, and others take Metro Mobility, which is a shared ride public transportation service. The Metro Transit city bus has routes that residents can use. A carshare service called "HourCar" can be accessed as well. Families often transport residents, and a nearby church has volunteers who will help people get to church or run errands. Residents are told about these options when they move in and whenever they request assistance with rides. Any staff will assist with arranging transportation for residents or direct them to someone who can. The front desk can also assist residents with transportation. The residents interviewed indicated that they use Metro Mobility or family for rides.	Compliant
The setting provides HCBS services in a space that is distinct from the space that institutional services are provided.	Compliant

Validation methods:

- ☒ Observation of the distinction of the separate spaces.
- ☒ Aerial photo and/or photos identifying the separation of settings.

Narrative:

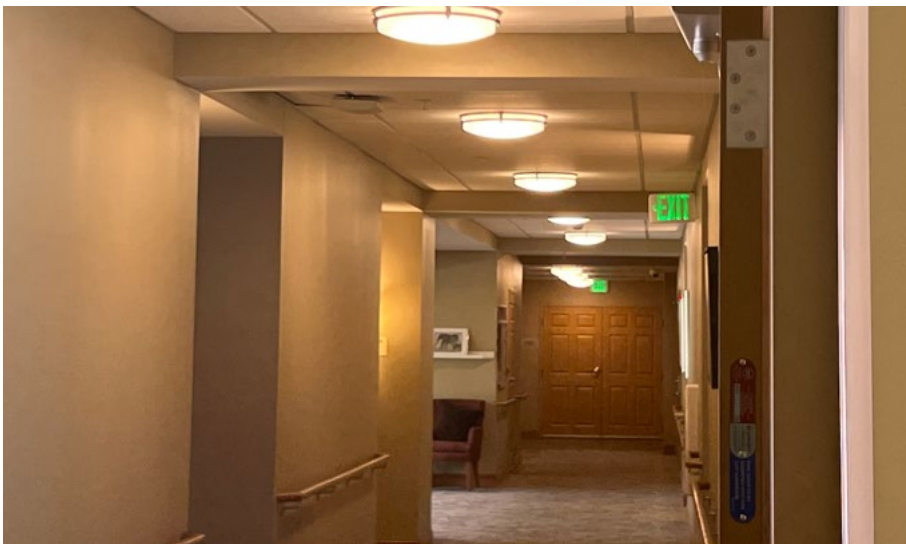
Iris Park Commons provides customized living services in a space that is distinct from the space used by the two skilled nursing facilities. Customized living services are provided in a building separated from the skilled nursing facilities by doors. Signage throughout the campus clearly identifies which building you are in. The setting has a separate entrance with signage and a dedicated parking area separate from the skilled nursing facilities. During the tour, when moving from one building to another, it was observed that the assisted living building is distinct from the skilled nursing facilities.



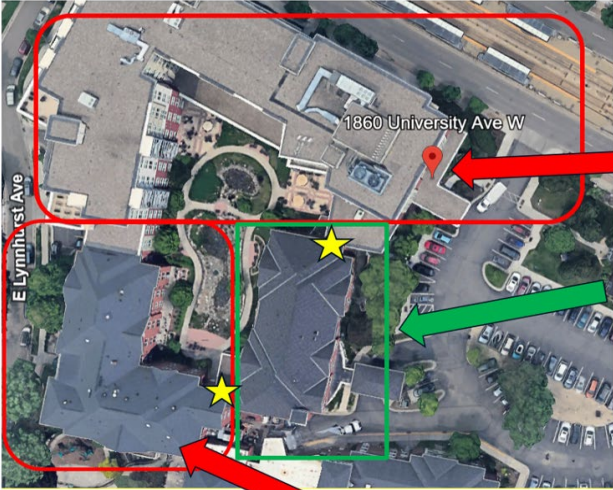
Sign and entrance for Iris Park Commons



Door to The Gardens Skilled Nursing Facility



Open door to Episcopal Church Home Skilled Nursing Facility

HCBS Rule requirement	Compliance determination
 The Gardens Skilled Nursing Facility Iris Park Commons Assisted Living Episcopal Church Home Skilled Nursing Facility Aerial View of Campus with different buildings outlined in different colors. Yellow stars indicate where the buildings are connected.	

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.

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 documentation, on-site observations and interviews.

HCBS Rule requirement	Compliance determination
The setting is selected by the individual from among a variety of setting options including non-disability specific settings. Validation methods: ☒ Interview(s) with residents. ☒ MnCHOICES support plan requirements: In the “What I Want my Life to Look Like” section of the support plan, using person-centered principles, the case manager/care coordinator must describe the person’s choice about housing. The case manager/care coordinator must have a conversation with the person for each of the statements on the signature sheet to ensure they understand what they are agreeing to and have the necessary information to make an informed choice. The case manager/care coordinator selects yes or no for each statement. If the person answers ‘no’ the case manager/care coordinator must review the content again in another format or discuss further with the person. ☒ Health plan and Lead Agency Review support plan audits: As required under MN Statutes, section 256B.0911, subd. 29, “The written support plan must include: (d) (2) the individual's options and choices to meet identified needs, including all available options for: (iii) living arrangements; (v) service provided in a non-disability-specific setting;” Narrative: Case managers are required under state statute to offer and document all available options for living arrangement in the person’s support plan, including non-disability specific options. During resident interviews, when asked, “Did you choose to live here? Were you offered other options?” one resident said, “I absolutely chose this place. I didn’t need to see any other options.” She stated that the case worker told her there were other options, but she wasn’t interested. Another resident stated she was living temporarily in another facility nearby and was about to be discharged. She stated, “I graduated to being able to live in an assisted living, and this one was close to the people who support me, so I took it right away.” When asked if she was offered other places, she said yes but she already knew she wanted to live here.	Compliant

The setting facilitates individual choice regarding services and supports, and who provides them. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure(s). ☒ State license requirement: As required under MN Statutes, section 144G.91, Subd. 24, "Residents have the right to be informed by the assisted living facility, prior to executing an assisted living contract, that other public and private services may be available and that the resident has the right to purchase, contract for, or obtain services from a provider other than the assisted living facility." ☐ State statutory requirement: As required under MN Statutes, section 325F.722, Subd. 2, "(a) Every exempt setting must execute a written contract with a resident or the resident's representative and must operate in accordance with the terms of the contract. The resident or the resident's representative must be given a complete copy of the contract and all supporting documents and attachments and any changes whenever changes are made. (b) The contract must include at least the following elements in itself or through supporting documents or attachments: (12) a statement regarding the ability of a resident to receive services from providers with whom the exempt setting does not have an arrangement;" ☐ State license requirement: As required under MN Statutes, section 144A.44, Subd. 1, "(a) A client who receives home care services in the community or in an assisted living facility licensed under chapter 144G has these rights: (8) know that there may be other services available in the community, including other home care services and providers, and to know where to find information about these services; (9) choose freely among available providers and to change providers after services have begun, within the limits of health insurance, long-term care insurance, medical assistance, other health programs, or public programs;" Narrative: Per the validation methods checked above, it has been determined that Iris Park Commons is compliant with this requirement. Administrative staff confirm that residents have this right which is included in the Minnesota Bill of Rights for Assisted Living Residents. Throughout the rest of this	Compliant
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HCBS Rule requirement	Compliance determination
evidentiary package, the title of this document will be shortened and referred to as the “Bill of Rights.” Staff have training to understand the Bill of Rights during their orientation and annually after. Iris Park Commons is covered by Episcopal Homes’ policy 2.42 Right to Outside Provider. The policy states, “Residents at Iris Park Commons are free to retain services, including therapy and treatment services, from an offsite service provider.” The procedure related to this policy includes a statement that Iris Park Commons will “make every effort to assist residents in obtaining information” about other providers and assist them as needed to find another provider. The option for outside providers is discussed with the resident while reviewing the Bill of Rights before they move in, and at any time a person states that they are interested in finding a new provider. During resident interviews, when asked if they had a choice of who provides their services, one resident reported that “I see my own doctor. He knows me.” This physician is not one of providers that works directly with Iris Park Commons. She went on to say, “Besides, it gets me out and about and I get to have lunch with my son after appointments.” Another resident stated she chooses to use the services that come right to the building. She stated, “It’s nice, especially in the winter when I don’t like going outside for appointments.” She said, “I’m not picky when it comes to that, but if I didn’t like one (person) the staff would help me find someone else.” During site visit, another home care provider’s van was observed in the parking lot.	

HCBS Rule requirement	Compliance determination
Each person at the setting has a written lease or residency agreement in place providing protections to address eviction processes and appeals. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of written lease or residency agreement. ☒ State license requirement: This setting submitted a compliant Assisted Living lease/contract as required under MN Statutes, sections 144G.50 – 144G.57. MN Statutes, section 144G.11 states, “Assisted Living facilities are subject to and must comply with Chapter 504B.” The lease/contract is required to be signed by the setting and the person receiving services or their representative. ☐ State statutory requirement: This setting submitted a compliant written lease/contract as required under MN Statutes, Section 325F.722, Subd. 8, “Each exempt setting must comply with chapter 504B, and must obtain and maintain all other licenses, permits, registrations, or other required governmental approvals. An exempt setting is not required to obtain a lodging license under chapter 157 and related rules.” Narrative: Per the validation methods checked above, Iris Park Commons has demonstrated that they are compliant with this requirement. A copy of the lease was reviewed. During the interview with the assisted living director, it was confirmed that that residents receive a copy of the Residency Agreement for review prior to signing and/or moving into the setting. Residents interviewed reported that they did have an opportunity to review the document prior to moving in, and they did sign an agreement when they moved in. assisted living director and residents interviewed confirmed that residents do get notice if something changes. During an interview with a resident, she said “It’s good to know the rules” (referring to the Residency Agreement). Another resident said, “Yeah, I reviewed that thing.”	Compliant

Each person at the setting has privacy in his/her sleeping or living unit including a lockable door with only appropriate staff having keys to doors. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure. ☒ Observation of lockable unit doors during on-site visit. ☒ State license requirement: As required under MN Statutes, section 144G.91, Subd. 13, "(a) Residents have the right to consideration of their privacy, individuality, and cultural identity as related to their social, religious, and psychological well-being. Staff must respect the privacy of a resident's space by knocking on the door and seeking consent before entering, except in an emergency or unless otherwise documented in the resident's service plan. (b) Residents have the right to have and use a lockable door to the resident's unit. The facility shall provide locks on the resident's unit. Only a staff member with a specific need to enter the unit shall have keys. This right may be restricted in certain circumstances if necessary for a resident's health and safety and documented in the resident's service plan." (Refer to Rights Modification section) ☐ State statutory requirement: As required under MN Statutes, section 325F.722 Subd. 2, "(c) The contract must include a statement regarding: (5) a resident's right to have and use a lockable door to the resident's unit. The exempt setting must provide the locks on the unit. Only a staff member with a specific need to enter the unit shall have keys, and advance notice must be given to the resident before entrance by the staff member, when possible." Narrative: Per the validation methods checked above, Iris Park Commons is compliant with this requirement. The Residency Agreement states, "The apartment is equipped with a lockable door that may be locked or unlocked at the resident's discretion. Select Management and Episcopal Home Care Staff have keys to the door of the apartment, depending upon the staff's need to enter the apartment." Staff are trained on this resident right during their orientation, and annually thereafter. Locks were observed on all the residents' doors in the setting, and interviews with the assisted living	Compliant
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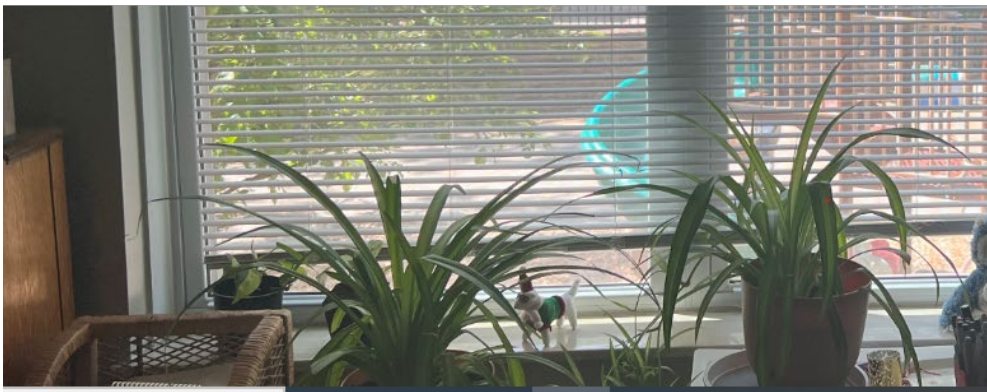
HCBS Rule requirement	Compliance determination
director confirmed that they have this right. During resident interviews, one resident stated, "Of course we can lock our doors. I feel safe and secure here. I even wear my key around my neck." Another resident stated, "I lock my door if I don't want company, but sometimes I leave it open too."  Lock on resident's door	

HCBS Rule requirement	Compliance determination
The setting facilitates that a person, who shares a bedroom/unit, is with a roommate of their choice. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure. ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to choose a roommate if sharing a unit." ☐ State statutory requirement: As required under MN Statutes, section 325F.722 Subd. 2, "(c) The contract must include a statement regarding: (4) a resident's right to choose a roommate if sharing a unit;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. The resident is informed of this right through the Residency Agreement, which states, "The resident has the right to choose the person with whom tenant may share the apartment." Staff are trained on this resident right during their orientation, through the review of the Bill of Rights. Staff are trained annually thereafter. Residents interviewed said they aren't asked to share their apartments with anyone, though they said some people in the building do live with their spouses. During resident interviews in their apartments, there was no indication that anyone else lived with the resident.	Compliant

The setting provides people with the freedom to furnish and decorate their bedroom and living unit within the lease or residency agreement. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure. ☒ Observation of residents' units during on-site visit. ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to furnish and decorate the resident's unit within the terms of the assisted living contract." ☐ State statutory requirement: As required under MN Statutes, section 325F.722 Subd. 2, "(c) The contract must include a statement regarding: (1) the ability of a resident to furnish and decorate the resident's unit within the terms of the lease;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. The resident is informed of this right when the Bill of Rights is reviewed, and through the Residency Agreement, which states, "Resident has the right to furnish and decorate the apartment within the terms of the agreement." In addition, the welcome letter to new residents states, "We want you to make your new apartment your home – bring items to decorate." Staff are trained on this resident right during their orientation, and annually thereafter. The assisted living director confirmed that people are invited to decorate their homes with personal decorations. During resident interviews and tour of the setting, personal and individualized decorations were observed both inside and outside resident units. Residents verified that they were able to decorate their place with their own personal items. One woman was very excited to share her father's artwork that was hanging on her wall. Family photographs, military plaques, crafts and sport memorabilia were observed displayed during the site visit. Many residents put up personalized decorations in the entrance to their living units as well.	Compliant
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HCBS Rule requirement

Compliance determination



Plants and decorations in resident's unit



Pictures on resident's wall

The setting provides people access to food at any time. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure. ☒ Observation during on-site visit. ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to access food at any time. This right may be restricted in certain circumstances if necessary for the resident's health and safety and if documented in the resident's service plan." ☐ State statutory requirement: As required under MN Statutes, section 325F.722 subd. 2, "(c) The contract must include a statement regarding: (2) a resident's right to access food at any time;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. The resident is informed of this right when the Bill of Rights is reviewed. Residents can store and prepare food in their own apartments. In addition, there is a Bistro on site, and coffee and snacks are provided in the Welcome Center. The Residency Agreement outlines what meals are going be provided, and which other meals can be purchased. In the first five days after residents move in, they are escorted to meals and activities to make them feel welcome. During that time, residents are shown where the Bistro is, as well as the gift shop, which sells snacks. Per my interview with the assisted living director, the kitchen always has food available for a resident. Staff are trained on this resident right during their orientation, and annually thereafter. Staff interviewed confirmed that they would provide food for residents at any time if they were hungry. They stated they can just ask the kitchen. During resident interviews, they stated they did have access to food at any time. One resident said she loves to get the menus that are distributed, but she also always keeps snacks in her apartment. Another resident said if they were at an appointment or something and missed a meal, staff would wrap a plate up for them and put it in their apartment. Kitchenettes were	Compliant
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observed in resident apartments during interviews and a tour given. During site visit, people were observed eating at the bistro and in the dining room.



Kitchenette in resident's unit



The bistro

HCBS Rule requirement	Compliance determination
 The dining room	

The setting allows people to have visitors at any time. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure. ☒ Observation of people coming and going during on-site visit. ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to meet with or receive visits at any time by the resident's family, guardian, conservator, health care agent, attorney, advocate, or religious or social work counselor, or any person of the resident's choosing. This right may be restricted in certain circumstances if necessary for the resident's health and safety and if documented in the resident's service plan." (See Rights Modification section) ☐ State statutory requirement: As required under MN Statutes, section 325F.722 Subd. 2, "(c) The contract must include a statement regarding: (3) a resident's right to choose the resident's visitors and times of visits;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. The resident is informed of this right when the Bill of Rights is reviewed, and through the Residency Agreement, which states, "Resident may have guests of resident's choice at any time." Residents can reserve a private room if they would like to entertain guests, and there is a guest apartment that can be reserved for guest who want to be there for longer visits. Staff are trained on this resident right during their orientation, and annually thereafter. Per Assisted Living Director, there are no restrictions on when residents can have visitors. When the front doors are locked in the evening, visitors must buzz to get in. Residents interviewed confirmed that they can have visitors at any time, and that they can visit with them in the area of their choice. During site visit, visitors were seen coming in and out of the facility. Observed visitor log-in sheet that confirmed visitors had already been to the setting that same day. Observed residents visiting with people who appeared to be visitors in the lobby area. During tour of setting, visitors were observed in resident apartments.	Compliant
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HCBS Rule requirement

Compliance
determination



Sign in and out sheet for visitors

The setting provides opportunities for people to volunteer or seek employment and work in competitive integrated settings. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure. ☒ Health plan and Lead Agency Review support plan audits: As required under MN Statutes, section 256B.0911, subd. 29, "The written support plan must include:(d) (2) the individual's options and choices to meet identified needs, including all available options for: (ii) employment services, settings, and providers." ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to engage in community life and in activities of their choice. This includes the right to participate in commercial, religious, social, community, and political activities without interference and at their discretion if the activities do not infringe on the rights of other residents." ☒ State statutory requirement: As required under MN Statutes, section 256B.0911 subd. 29, "(d) The written support plan must include: (2) the individual's options and choices to meet identified needs, including all available options for: (ii) employment services, settings, and providers;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. Policy 2.05a Resident Employment/Volunteering states, "Iris Park Commons provides opportunities and support for residents to seek employment or volunteer opportunities either on campus or in the community." One of the procedures related to this policy states, "Iris Park Commons will provide flexible scheduling, including accommodating a resident's work/volunteer schedule, in delivering a resident's supportive services. The resident can choose the schedule that works for them, rather than what works for Iris Park Commons." Staff are trained on this resident right during their orientation, and annually thereafter. The assisted living director stated there were no residents at this time that are employed in the community, but some residents do volunteer.	Compliant
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HCBS Rule requirement	Compliance determination
Residents interviewed said they had no interest in working. One laughed and said, "Why would I want to do that? I've done my time working," when asked if they wanted to work.	

The setting is physically accessible to the individual. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure. ☒ Observation made during on-site visit. ☒ State license requirement: As required under MN Statutes, section 144G.11, "Assisted living facilities: (1) are subject to and must comply with chapter 504B;" ☐ State statutory requirement: As required under MN Statutes, section 325F.722, subd. 8, "Each exempt setting must comply with chapter 504B, and must obtain and maintain all other licenses, permits, registrations, or other required governmental approvals. An exempt setting is not required to obtain a lodging license under chapter 157 and related rules." ☒ State statutory requirement: As required under MN Statutes, section 363A.10, subd. 1, "For purposes of section 363A.09, discrimination includes: (1) a refusal to permit, at the expense of the disabled person, reasonable modifications of existing premises occupied or to be occupied by the disabled person if modifications may be necessary to afford the disabled person full enjoyment of the premises; a landlord may, where it is reasonable to do so, condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, excluding reasonable wear and tear; (2) a refusal to make reasonable accommodations in rules, policies, practices, or services, when accommodations may be necessary to afford a disabled person equal opportunity to use and enjoy a dwelling." Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. The resident is informed of this right when the Bill of Rights is reviewed. The assisted living director confirmed the setting is fully accessible to the residents. Staff are trained on this resident right during their orientation, and annually thereafter. There is a specific section in the staff training on accessibility, so all staff know how to assist residents if they need accommodations, including directing them to the proper staff person who handles these requests.	Compliant
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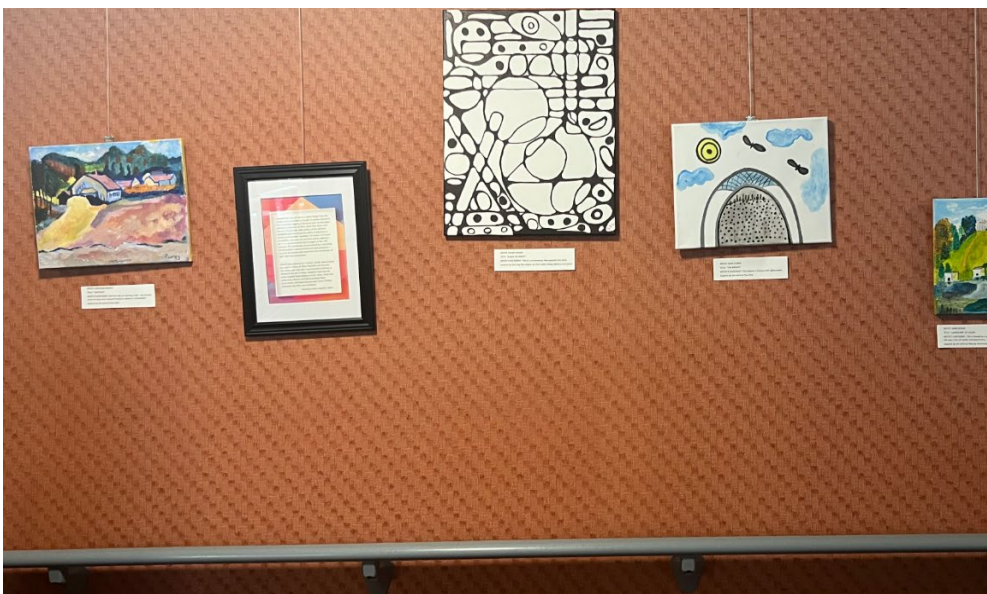
HCBS Rule requirement

Compliance determination

During resident interviews, residents stated that they can get around their units and the building easily. Observed shower chairs, grab bars and other accessibility equipment while in resident apartments. One resident uses a walker and when I asked if it's hard to navigate the building, she said, "No, not at all, I can get around easy, even with my walker." Railings were observed in hallways as well for people to hold on to while they walk.



Grab bars in resident's bathroom



Railing below resident's artwork

Any modification of the rights specified in HCBS rule under 441.301(c)(4)(vi)(A) through (D) must be supported by a specific assessed need and documented in the person-centered plan/ HCBS Rights Modification Support Plan Attachment. Validation methods: ☒ Interview(s) with administrative staff. ☒ Review of setting's policy and procedure. ☒ Review of person's support plan, if a rights modification is in place. ☐ N/A. No residents at this setting, enrolled in Elderly Waiver, have a need for a Rights Modification at this time. ☒ State license requirement: As required under MN Statutes, section 144G.911, "The resident's rights in section 144G.91, subdivisions 12, 13, and 18, may be restricted for an individual resident only if determined necessary for health and safety reasons identified by the facility through an initial assessment or reassessment under section 144G.70, subdivision 2, and documented in the written service plan under section 144G.70, subdivision 4. Any restrictions of those rights for people served under chapter 256S and section 256B.49 must be documented by the case manager in the resident's support plan, as defined in sections 256B.49, subdivision 15, and 256S.10." ☐ State statutory requirement: As required under MN Statutes, section 325F.722, subd. 2, "(d) A restriction of a resident's rights under this subdivision is allowed only if determined necessary for health and safety reasons identified by a home care provider's registered nurse in an initial assessment or reassessment, as defined under section 144A.4791, subdivision 8, and documented in the written service plan under section 144A.4791, subdivision 9. Any restrictions of those rights for people served under section 256B.49 and chapter 256S must be documented in the resident's support plan, as defined under sections 256B.49, subdivision 15, and 256S.10." Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. Their policy states "As a Home and Community Based Services (HCBS) provider offering financial assistance programs through the Department of Human Services (DHS), Iris Park Commons must respect and uphold all resident rights (as outlined in	Compliant
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HCBS Rule requirement	Compliance determination
the Assisted Living Resident Bill of Rights). If a person has a health and safety risk requiring a rights modification, the person’s case manager/care coordinator will be contacted to ensure compliance.” “Katy’s Cottage,” which is the floor of the assisted living that serves residents diagnosed with dementia, does limit residents from leaving the floor, through a secured elevator. All residents in Iris Park Commons/Katy’s Cottage are evaluated using the setting’s Resident Universal Assessment Tool (RUAT) to identify what supports are needed for their safety. An Individual Abuse Prevention Plan (IAPP) is developed from the results of these assessments. IAPPs contain information on why each resident requires a secured unit for their safety and wellbeing, as well as the plan to implement the supports. All RUATS and IAPPs for residents in Katy’s Cottage were reviewed. In addition, residents who are using HCBS waivers require a rights restriction form in the lead agency case file, as well as in the person’s assisted living record. Rights restriction forms for the people in Katy’s Cottage on waivers were present and reviewed.	

The setting provides people opportunities to access and engage in community life to the same degree as individuals not receiving Medicaid. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure, activity calendar(s). ☒ Observation of residents' units during on-site visit. ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to engage in community life and in activities of their choice. This includes the right to participate in commercial, religious, social, community, and political activities without interference and at their discretion if the activities do not infringe on the rights of other residents." ☒ State statutory requirement: As required under MN Statutes, section 256S.10, subd. 3, "Each participant's support plan must: (1) include the participant's need for service and identify service needs that will be or that are met by the participant's relatives, friends, and others, as well as community services used by the general public; (2) include the use of volunteers, religious organizations, social clubs, and civic and service organizations to support the participant in the community;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. Policy 1.34 Activity Programing states, "On a regular basis, Iris Park Commons will provide a wide range of activities and social recreation for its residents." One of procedures listed under this policy states, "Iris Park Commons encourages outings and engagements outside the facility and in the community." People at Iris Park Commons have access to activities offered at the other buildings on campus. Transportation is provided for community events that the facility coordinates. Some examples of community activities that have been offered include visits to: • Movie theaters • Heritage Center • Como Conservatory • Como Park music concerts	Compliant
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- Restaurants
- State Fair
- History Center
- Bell Museum
- Shopping
- Train Museum
- James J. Hill House
- Jewish Community Center
- State Capitol
- Polling places to vote
- Twins game
- The Blue Soda store/factory
- Community church services.

Residents go out into the community with friends they have met at Iris Park Commons. They go to movies, out to eat, shopping, beauty shops, church services, walks around the community and other activities that are organized by the residents themselves. Families and friends come to pick up residents for special occasions such as birthdays, weddings, graduations, baby showers and other celebrations.

Staff are trained on this resident right during their orientation, and annually thereafter. There is a section in the staff orientation training on the importance of keeping people engaged in meaningful activities. Interviews with the assisted living director and other staff members reported that the person who coordinates activities has worked there for a very long time. The assisted living director and staff stated that activity coordinators know residents well and uses their interests to plan activities.

During resident interviews, one person shared that she likes to do some activities, and said, "I could do more activities if I want to, there is so many choose from. But I am more of a homebody. I like to stay in my apartment and do crafts. There are some activities I do enjoy doing with the rest of the residents, so I check the calendar every day." Another resident stated, "I like doing activities in the community, especially since they provide transportation. I like to go shopping." One resident stated, "I have contacts outside of this place that I like to see."

Residents reported that they get calendars for each month's activities delivered to their apartments, and that calendars are "posted all over the building to let us know what's going on." One person also reported that the activity coordinator and other staff will come around and remind

people of activities so they can join in if desired. Residents knew where they needed to go to find the sign-ups for activities that require advance notice of attendance. Residents stated that the activities person is “the best,” and that she “gets what we like to do because she asks us.” Staff confirmed during interviews that activity coordinator goes around regularly to remind residents about activities that day.

One resident stated that she is so excited about “Writer’s Group.” She shared that one of the stories she plans to present at the next group is about her dog as a child. She said she is proud to be a part of the group.

The community also visits Iris Park Commons. They have a bistro that community members, as well as residents and families can utilize. The campus holds a big block party every year that people from the community and residents attend. The residents talked about how much they like the intergenerational program because they get to see the kids in the on-campus childcare center Kinder Village. The assisted living director describes the program as “Our ‘villagers’ (the children) and their ‘grandfriends’ (residents) have a mutual relationship where grandfriends teach our villagers that wrinkles and walkers are not scary, and our villagers remind our grandfriends that there is still so much life to live. We have daily intergenerational programs/activities together such as planting flowers, personalized bingo (“Find the grandfriend’s picture” or “Find the villager’s picture” on the bingo board), birthday parties, dances, and more. It’s always a treat to hear the little voices making a ruckus and to see our residents smiling and laughing along.”

Onsite activities include swimming in the pool at the setting, exercise and wellness classes, arts and crafts, card and board games, movies in the onsite movie theatre, religious services, Bingo and Karaoke. Another of the favorite activities mentioned during resident interviews was pet visits. Residents said they loved seeing and petting the animals. Residents were observed participating in different activities throughout the campus. Some were inside, playing cards, while others were outside enjoying the duck pond with friends. We observed residents leaving and coming back from walks. We observed activity calendars posted throughout the setting. During resident interviews, we observed these calendars in their apartments.



Sign up area for activities



Activity room

HCBS Rule requirement

Compliance determination



On site theater

HCBS Rule requirement	Compliance determination
The setting supports the person’s control of personal resources to the same degree as individuals not receiving Medicaid HCBS. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting’s policy and procedure. ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to control personal resources." ☐ State license requirement: As required under MN Statutes, section 144A.479 Subd. 5, “(b) A home care provider or staff may not borrow a client's funds or personal or real property, nor in any way convert a client's property to the home care provider's or staff's possession.” Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. Policy 1.36 Handling of Resident Finances and Property states, “Iris Park commons, may, when appropriate, assist residents with simple financial tasks such as budgeting, paying bills, and purchasing household goods, but will not otherwise manage a resident’s property.” Staff are trained on this resident right during their orientation, and annually thereafter. The assisted living director stated that they don’t manage resident finances except as noted in the policy above. Interviews with residents confirmed that Iris Park Commons doesn’t manage their money or property. Either they manage their own finances, or a family member does. They felt they were able to get money when they needed it.	Compliant

The setting ensures people’s right to privacy. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting’s policy and procedure. ☒ Observation during on-site visit. ☒ State license requirements: As required under MN Statutes, section 144G.91, "Residents have the right to consideration of their privacy, individuality, and cultural identity as related to their social, religious, and psychological well-being. Staff must respect the privacy of a resident's space by knocking on the door and seeking consent before entering, except in an emergency or unless otherwise documented in the resident's service plan." "Residents have the right to respect and privacy regarding the resident's service plan. Case discussion, consultation, examination, and treatment are confidential and must be conducted discreetly. Privacy must be respected during toileting, bathing, and other activities of personal hygiene, except as needed for resident safety or assistance." "Residents have the right to communicate privately with persons of their choice." ☐ State license requirements: As required under MN Statutes, section 144A.44, subd. 1, "(a) A client who receives home care services in the community or in an assisted living facility licensed under chapter 144G has these rights: (10) have personal, financial, and medical information kept private, and to be advised of the provider's policies and procedures regarding disclosure of such information;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. Residents are notified of this right when the Bill of Rights is reviewed in the "Personal and treatment privacy" section. Staff are trained on this resident right through review of the Bill of Rights during their orientation, and annually thereafter. They are trained on HIPAA and other privacy practices. Residents interviewed stated that the staff always knock before entering and doesn’t share their personal information around others. Observed several staff knocking before entering an apartment. While doing one of the resident interviews, a staff person knocked first before entering the apartment. Staff politely said they would come back later. Observed staff talking quietly to a	Compliant
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HCBS Rule requirement

**Compliance
determination**

resident to keep the conversation private from others. Staff interviewed confirmed that they always respect a person’s privacy. One staff stated, “No one needs information about another resident here, even if they ask.”



Locked mailboxes for private mail

The setting ensures people’s dignity and respect. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting’s policy and procedure. ☒ Observation during on-site visit. ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to be treated with courtesy and respect, and to have the resident's property treated with respect." ☐ State license requirement: As required under MN Statutes, section 144A.44, subd. 1, "(a) A client who receives home care services in the community or in an assisted living facility licensed under chapter 144G has these rights: (13) be treated with courtesy and respect, and to have the client's property treated with respect;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. Resident is notified of this right when the Bill of Rights is reviewed with them. Staff are trained on this resident right through reviewing the Bill of Rights during their orientation, and annually thereafter. Employees learn that respect and dignity is a core value of Episcopal Homes during these trainings. The orientation/annual training reminds staff that “We honor the inherent worth, dignity and unique individuality of every human being – Respect.” One staff interviewed said “It’s our job to make this place peaceful and like a family.” During resident interviews, when asked if they are treated with respect and dignity, one resident said, “Oh yes, I feel like they have always treated me with supreme dignity.” Another resident said, “Of course, definitely!” One resident said, “The staff are very professional and listen to us. I would even say they are loving in the way they treat us.” The setting has a world map where each resident can place a pin on their place of birth. Programming is developed to respect people’s birthplaces and honor traditions. One resident had a skirt displayed in her apartment that had been part of an activity designed to allow her to share her cultural practices. The setting also has activities for the residents who belong to the LGBTQIA+ community.	Compliant
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Map for people to indicate hometown

HCBS Rule requirement	Compliance determination
The setting ensures people’s freedom from coercion and restraint. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting’s policy and procedure. ☒ Observation during on-site visit ☒ State license requirement: As required under MN Statutes, section 144G.42, the assisted living facility must comply with the requirements for the reporting of maltreatment of vulnerable adults in section 626.557. The facility must establish and implement a written procedure to ensure that all cases of suspected maltreatment are reported. MN Statue 144G.63, proper orientation and annual training is given to staff on the Vulnerable Adults Act, as well as the Assisted Living Bill of Rights and staff responsibilities related to ensuring the exercise and protection of those rights.” ☐ State statutory requirement: As required under MN Statutes, section 325F.722, Subd. 7, “Residents must be free from any physical or chemical restraints imposed for purposes of discipline or convenience.” Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. They use the Bill of Rights as their policy in this area. Per setting policy and Elderly Waiver requirements, no restraints are used, and coercion is prohibited. Staff are trained on this resident right during their orientation, and annually thereafter. Vulnerable adult training is given to recognize any abuse or coercion and that restraints are prohibited. Residents are informed of this right through review of the Bill of Rights. Resident interviews confirmed that they never felt coerced or had restraints used with them.	Compliant

The setting optimizes individual initiative, autonomy, and independence in making life choices, including daily schedule and with whom to interact. Validation methods: ☒ Interview(s) with administrative staff. ☒ Interview(s) with residents. ☒ Review of setting's policy and procedure. ☒ Observation made during on-site visit. ☒ State license requirement: As required under MN Statutes, section 144G.91, "Residents have the right to individual autonomy, initiative, and independence in making life choices, including establishing a daily schedule and choosing with whom to interact." ☐ State license requirement: As required under MN Statutes, section 144A.44, subd. 1, "(a) A client who receives home care services in the community or in an assisted living facility licensed under chapter 144G has these rights: (2) receive care and services according to a suitable and up-to-date plan, and subject to accepted health care, medical or nursing standards and person-centered care, to take an active part in developing, modifying, and evaluating the plan and services;" ☒ State statutory requirement: As required under MN Statutes, section 256S.10, subd. 3, "Each participant's support plan must: (4) identify the participant's preferences for services as stated by the participant or the participant's legal guardian or conservator; (7) identify specific services and the amount, frequency, duration, and cost of the services to be provided to the participant based on assessed needs, preferences, and available resources;" Narrative: Per the validation methods checked above, it is determined that Iris Park Commons is compliant with this requirement. They use the Bill of Rights as their policy in this area. Per interview with the Assisted Living Director, residents can choose their schedules, and who they would like to spend time with. Residents are always free to decline activities or other scheduled events. Staff are trained on this resident right through review of the Bill of Rights at their orientation, and annually thereafter.	Compliant
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HCBS Rule requirement	Compliance determination
During Resident interviews, when asked if they get to choose their own schedules, one resident stated, “Oh yeah, we have total freedom to do what we want, except for meds. Those they keep at a certain time.” When asked if they have to get up at a certain time, or eat at a certain time, even if they aren’t hungry, one resident stated, “They don’t ever make me get up at certain times or anything. If I don’t eat during scheduled mealtimes, I just eat later.” Observed residents throughout the setting engaged in various activities, both with staff and with people who appeared to be visitors.	

Additional pictures of the HCBS setting



Exercise Room



Front lounge area



Area for relaxation



Pond and garden area in courtyard



Sensory area

Public comment summary

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

DHS sought public comment from 8 a.m. on June 16, 2025, to 4 p.m. on July 16, 2025.

We sought public comments using the following methods:

- Evidentiary packages posted online on the [Home and Community Based Services Rule transition plan - Requirements for new HCBS settings](#) page
- Evidentiary packages specific to each setting posted in a common area of the setting
- Notice of public comment period via [June 16, 2025, eList announcement](#)
- Notification to providers via email
- Notification to managed care organizations and Area Agencies on Aging (AAAs) via eList announcement
- Notification to Office of Ombudsman for Long-Term Care via eList announcement

Minnesota’s recommendation

Date of recommendation: 7/17/2025
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.