

HCBS Final Rule Evidentiary Package

Glacial Trails



Setting information

Setting name: Glacial Trails Memory Care	ID #: 32278
Street address: 109 East 7th Street Star Buck, MN 56381	Phone: 320-239-7126
Setting website: Glacial Trails (https://mchs-healthcare.org/glacial-trails)	Date of site visit: 7/31/2018

Waiver service type

Waiver service	Service type
<input type="checkbox"/> Alternative Care (AC) <input checked="" type="checkbox"/> Elderly Waiver (EW) <input type="checkbox"/> Brain Injury (BI) <input type="checkbox"/> Community Access for Disability Inclusion (CADI) <input type="checkbox"/> Community Alternative Care (CAC) <input type="checkbox"/> Developmental Disabilities (DD)	Customized Living

Reason for heightened scrutiny

Prong type	Category	Type of setting
Prong 1 Located in a Public or Private Institution	Name of Institution	Name of Institution Minnewaska Lutheran Home

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

General summary

Glacial Trails Memory Care is located in the city of Star Buck in Pope County, 135 miles northwest of Minneapolis. Star Buck had a population of 1,302 in 2010.

At the time of the provider attestation, Glacial Trails Memory Care provided customized living services to eight people. The setting has 16 living units. The setting served four people supported by a home and community-based waiver program.

The customized living setting is offered by Minnewaska Community Health Services, a nonprofit organization offering a continuum of senior living options in the Star Buck Area, including independent living, customized living, short- and long-stay skilled nursing and in- and out-patient therapy services.

Glacial Trails Memory Care is a customized living setting with 24-hour staffing available and is located on the same property as Minnewaska Lutheran Home (a nursing facility) and the therapy services. The independent living and assisted living residences are located on separate properties in the Star Buck community area.

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 tasks (e.g., delegated nursing tasks), home management tasks, meal preparation and service, socialization, assisting people with arranging meetings and appointments, assisting with money management, assisting people 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) (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 for customized living services](http://www.dhs.state.mn.us/id_001787#) (http://www.dhs.state.mn.us/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>Glacial Trails Memory Care, the customized living setting, has separate managers who oversee housing and nursing services in the setting. The managers report to the administrator of the care campus. The setting is connected financially to the entire campus, but it manages decisions about financial matters at the setting level as well.</p>
<input checked="" type="checkbox"/> Met	<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-</p>

<input type="checkbox"/> Unmet <input type="checkbox"/> Not applicable	<p>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>All staff who work in the customized living setting receive HCBS settings rule training and other relevant training and orientation for the setting. The direct care staff working in the nursing facility assist only occasionally in the customized living setting. Those who do assist in the setting receive HCBS training.</p>
<input checked="" type="checkbox"/> Met <input type="checkbox"/> Unmet <input type="checkbox"/> Not applicable	<p>Participants in the setting in question do not have to rely primarily on transportation or other services provided by the facility setting, to the exclusion of other options; (Describe the proximity to avenues of available public transportation or an explanation of how transportation is provided where public transportation is limited.)</p> <p>People living in this setting have several options for transportation to support community engagement and inclusion, including:</p> <ul style="list-style-type: none"> • The setting’s own van • Rainbow Rider • The public transit provider • Rides from family and friends • The Veterans Administration • Local van service.
<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>The customized living setting is separate from the nursing facility. The customized living setting has its own signage and entrance. The setting is connected to the nursing facility by a hallway and doorway. People who live in the setting and visitors can come and go from a separate entrance than the nursing facility’s main entrance. In the image below, the setting is outlined in blue.</p>



Community engagement opportunities and experiences

Glacial Trails Memory Care is a setting focused on caring for people with Alzheimer's disease and other dementias. The setting provides activities tailored to each person in the setting. It offers engagement opportunities that are planned specifically for the setting and the people who live in the setting. However, people living in the setting can also access programming planned for the adjacent nursing facility, as they desire.

Community engagement is overseen by the setting's managers and by activity staff who plan activities tailored to people's interests. People living in the setting and their family members provide input through interest assessment forms and direct communication with staff. People learn about activities offered in the setting through direct reminders from the staff.

The setting supports regular outings in the community with the support of its program van, volunteers and family and friends of those living in the setting. Outings include:

- Errands and medical appointments
- Community events and festivals
- Boating on Lake Minnewaska
- Worship services, funerals and other faith community events.

The setting is right on Main Street, adjacent to many destinations like the post office, a grocery store and restaurants. People living in the setting are often accompanied on walks to these nearby amenities.

The care campus where the setting is located also attracts many community events, much like a community center, because it has large meeting rooms, restrooms and parking. People living in the setting regularly attend community events held on campus.

On-site, programmed activities include:

- Music and art-making
- Baking
- Exercise sessions
- Social gatherings
- Chapel services.

HCBS characteristics

This section is a summary of the individual HCBS characteristics required in the HCBS rule. The findings for each characteristic are identified through the setting attestation documentation, on-site observation or both.

HCBS Rule requirement	Compliance status (Please select)
<p>Each person at the setting has a written lease or residency agreement in place providing protections to address eviction processes and appeals.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input type="checkbox"/> Observation made during on-site visit</p> <p>The setting provided a lease agreement as documentation through the provider attestation process.</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>Locks were observed on all unit doors in the setting. A manager interviewed explained people living in the setting use keys unless their individual care plans do not support it.</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 checked="" type="checkbox"/> Observation made during on-site visit</p>	Compliant

<p>Living units are not shared in this setting, unless a person wants to live with a spouse, partner or another person of his/her choice. At the time of the site visit, all people living in the setting were living alone in their living units.</p>	
<p>The setting provides people with the freedom to furnish and decorate their bedroom and living unit within the lease or residency agreement.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input checked="" type="checkbox"/> Observation made during on-site visit</p> <p>The lease allows people in the setting to decorate and personalize their living units. Living units were observed during the site visit and were decorated as people desired.</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>A direct care staff person in the setting who was interviewed said they regularly change the schedule of the services they deliver based on the preferences of the people living there and how the people are feeling each day.</p> <p>The direct care staff frequently offer people served in the setting beverages or snacks between meal times. People in the setting can also access food in the common kitchen area, or they can store food and drinks in their living units, as they desire.</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>A manager in the setting who was interviewed confirmed visitors can come and go as they like, and there are not any restrictions on visiting the setting. There is a separate entrance and parking area for the setting. The setting promotes active involvement by friends and family. During the site visit, a few visitors stopped in, and one volunteer also came to the setting.</p>	<p>Compliant</p>

<p>The setting provides opportunities for people to seek employment and work in competitive integrated settings.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input checked="" type="checkbox"/> Observation made during on-site visit</p> <p>The 12 people living in the setting at the time of the site visit had advanced stages of dementia and were not employed. A manager in the setting confirmed the setting accommodates people’s preferences so they can keep the schedule they prefer.</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>The common spaces and living units were observed to be accessible. Living units and bathrooms were observed to have accessibility features. The living units had grab bars and accessible features in the shower units. The setting supports a reasonable accommodations process, as needed.</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>Staff are aware of transportation options in their area and work with people in the setting to arrange rides, as needed. The setting also has a program van to support community engagement opportunities.</p> <p>See the community engagement section The setting offers a varied on-site activity calendar, as well as activities off-site, including outings supported by volunteers and people’s family and friends.</p> <p>A manager confirmed people living in the setting have options for on-site medical services, but they inform all people that they are free to choose providers from the wider community according to their preferences. Many people living in the setting use a mix of on-site and community medical 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>Compliant</p>

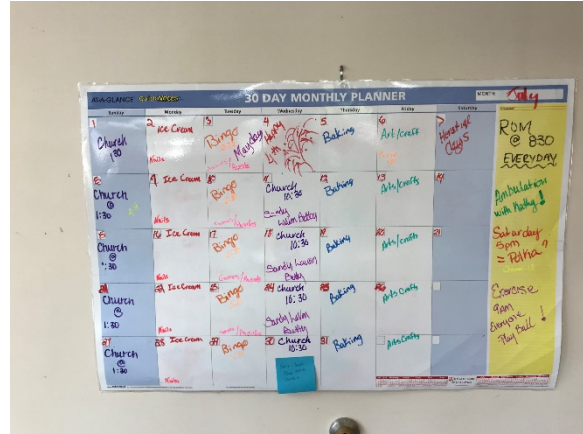
<input type="checkbox"/> Observation made during on-site visit The setting has a compliant policy related to assisting people in the setting with their personal resources. People living in the setting are properly informed of this right.	
<p>The setting ensures people’s right to privacy.</p> <input checked="" type="checkbox"/> Compliant documentation submitted with attestation <input checked="" type="checkbox"/> Observation made during on-site visit The setting has a compliant policy with respect to people’s privacy. People living in the setting had private living units.	Compliant
<p>The setting ensures people’s dignity and respect.</p> <input checked="" type="checkbox"/> Compliant documentation submitted with attestation <input checked="" type="checkbox"/> Observation made during on-site visit During the site visit, staff were observed treating people living in the setting with respect. The people in the setting that were observed were well groomed and dressed.	Compliant
<p>The setting ensures people’s freedom from coercion and restraint.</p> <input checked="" type="checkbox"/> Compliant documentation submitted with attestation <input type="checkbox"/> Observation made during on-site visit Setting staff are trained on the Minnesota Home Care Bill of Rights and the Minnesota Vulnerable Adults Act. A copy of the Home Care Bill of Rights also is given to people to inform them of their right to be free from coercion and restraint.	Compliant
<p>The setting optimizes individual initiative, autonomy and independence in making life choices, including daily schedule and with whom to interact.</p> <input checked="" type="checkbox"/> Compliant documentation submitted with attestation <input checked="" type="checkbox"/> Observation made during on-site visit A manager interviewed in the setting explained they work very hard to support people’s individual autonomy. People living in the setting can choose to participate in planned activities as they like, but they can also choose independent activities of their choosing in their living unit or in the setting’s common space. Puzzles, exercise equipment, a	Compliant

piano, radios, televisions, an outdoor courtyard and other resources are available in the common spaces for people to use, as they desire.

Pictures of the HCBS setting



Common kitchen area with food and drink available throughout the day



Setting activity calendar

Public comment summary

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

DHS sought public comment from April 30, 2019, to June 9, 2019, before submitting settings to the Centers Medicare & Medicaid Services (CMS) for heightened scrutiny.

We sought public comments using the following methods:

- Evidentiary packages posted online on the [Home and Community Based Services Rule transition plan page](#)
- Evidentiary packages specific to each setting posted in a common area of the setting
- Notice of public comment period via [May 10, 2019, eList announcement](#)
- Notification to lead agencies via regional resource specialists
- Notification to providers via email
- Notification to managed care organizations and Area Agencies on Aging (AA) via email
- Notification to long-term care ombudsman office via email
- Disability Hub MN virtual insight panel.

Minnesota's recommendation

Date of recommendation: 7/1/2019

Minnesota supports that this setting overcomes the institutional presumption and meets the requirements of a home and community-based setting. Provider is required to maintain on-going compliance with all HCBS requirements.