

HCBS Final Rule Evidentiary Package

Woodside Manor



Setting information

Setting name: Woodside Manor	ID # 20240
Street address: 501 Main Street NE Menahga, MN 56464	Phone: 218-564-4101
Setting website, if applicable: Woodside Manor (http://www.greenwoodconnections.com/pages/about_us.php)	Date of site visit: 7/17/2018

Waiver service type

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

Reason for heightened scrutiny

Prong type	Category	Type of setting
Prong 1 Located in a Public or Private Institution	Name of Institution	Name of Institution Green Pine Acres Nursing Home, 427 Main St NE, Menahga, MN, 56464

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

General summary

The Woodside Manor is an assisted living community in a housing-with-services establishment that serves 28 people in a rural community located in north-central Minnesota. Woodside Manor has 31, one-bedroom apartments and six, two-bedroom apartments, totaling 37 apartments. The setting reported on their attestation that it is serving 28 people across multiple payment sources, including 10 people receiving HCBS waiver funding. The Woodside Manor is located on the east-side edge of town amongst pine trees and residential homes in Menahga, Minnesota (est. population of 1,306 people per the 2010 U.S. Census).

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>Woodside Manor is separated from the nursing facility by a hallway with a separate entrance. Each setting has separate training and staff. People receiving services can choose to receive specialty medical services from other vendors (e.g., OT, PT, ST).</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>Per administration and staff interviews, staff at Woodside Manor are not scheduled to work in the nursing home. Customized living staff receive training regarding the home and community-based setting rule, and the submitted documentation is compliant with HCBS requirement training. In emergencies, nursing facility staff may provide time-limited backup support.</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>Woodside Manor has a van and bus available for transportation needs of people receiving services. There are no public transportation options. A</p>

	<p>Friendly Rider Schedule is posted for private purchase, and Woodside Manor staff will assist people with coordinating medical transportation.</p>
<p><input checked="" type="checkbox"/>Met <input type="checkbox"/>Unmet <input type="checkbox"/>Not applicable</p>	<p>The setting provides HCBS services in a space that is distinct from the space that institutional services are provided.</p> <p>Woodside Manor is a separate building, with separate signage and entrances, connected to the nursing facility via a hallway with a door that locks during the overnight hours. Woodside Manor has its own dedicated community space used for people receiving customized living services.</p> <div data-bbox="511 569 922 1115" data-label="Image"></div> <div data-bbox="1015 569 1433 1125" data-label="Image"></div>

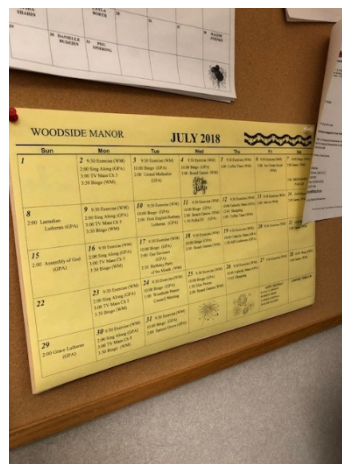
Community engagement opportunities and experiences

Woodside Manor has a monthly resident council meeting in which the following month's activities calendar is designed. People receiving services identify and choose the next month's planned activities. Woodside Manor provides scheduled transportation using the customized living's bus and van. Staff assist people in scheduled transportation as needed to access community activities and events. People receiving services may also use Friendly Rider transportation, which has a schedule posted in public areas.

Staff are trained in using the transportation vehicles and scheduling transportation options with people. Some people have family who live locally that will occasionally provide transportation. The community activities highlighted during our interviews with staff and people receiving services include:

- The theater, musicals and museums
- Restaurants
- Church
- Senior Center
- Tours – lights, leaves and lakes
- Wal-Mart and Dollar Store.

Activities on site that people can choose from include bingo, board and card games, pool, coffee time, ice cream socials, birthday celebrations, sing-a-longs, pizza parties and cookouts. Activities are posted on the community bulletin board and shared with residents. People can actively choose which activities they do and do not want to attend.



HCBS characteristics

<p>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.</p>	
<p>HCBS Rule requirement</p>	<p>Compliance status (Please select)</p>
<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 checked="" type="checkbox"/> Observation made during on-site visit</p> <p>Woodside Manor submitted an HCBS-compliant lease that includes the requirements of the HCBS final rule. People interviewed reported receiving a lease upon moving in.</p>	<p>Compliant</p>
<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>People have a key to their living unit. The main doors separating the customized living and nursing facility setting can be unlocked with each person’s living unit key. Staff can unlock this separating door via a call system. People were not observed using their lockable doors.</p>	<p>Compliant</p>
<p>The setting facilitates that a person, who shares a bedroom, is with a roommate of their choice.</p> <p><input checked="" type="checkbox"/> Compliant documentation submitted with attestation</p> <p><input type="checkbox"/> Observation made during on-site visit</p> <p>Not applicable; Woodside Manor does not provide shared rooms.</p>	<p>Compliant</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>Compliant</p>

<p>Woodside Manor submitted HCBS-compliant documentation demonstrating a person has the freedom to furnish and decorate his/her bedroom. In interviews with people receiving services, their reports confirmed this policy in practice. Living units were observed that are decorated based on people’s preferences.</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>Woodside Manor submitted HCBS-compliant documentation that demonstrates a person has the freedom to control his/her daily schedules. People receiving services reported choosing their daily activities and when and where to eat meals, including meals delivered to their rooms. One person interviewed stated, “Anytime! They will be flexible” when asked when they wake up or when they can eat a meal.</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 type="checkbox"/> Observation made during on-site visit</p> <p>Woodside Manor submitted HCBS-compliant documentation that demonstrates a person can have visitors at any time. People receiving services confirmed this policy in practice. Visitors were observed in the setting during the on-site visit. The Schwan’s Man was observed delivering food items to residents living at Woodside Manor.</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>Woodside Manor submitted HCBS-compliant documentation that demonstrates supporting opportunities for people to seek employment and work in competitive integrated settings. As learned through interviews of staff, administrator and people receiving services, one person living at Woodside Manor currently is employed 2-3 days a week at a local business. Staff support the person by providing a</p>	<p>Compliant</p>

flexible schedule of care delivery, meals set aside or sent along and transportation coordination as needed.	
<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>All areas of Woodside Manor are physically accessible per on-site visit observation. People interviewed confirmed they are able to access all areas of their apartment and the setting.</p>	Compliant
<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>Woodside Manor has available public and private spaces in the setting to meet with visitors, socialize or share in activities together. Community activities are posted on two separate bulletin boards, including a current calendar of events. People can choose which activities and engage in community life to participate in, per personal preferences. People were observed socializing in the gazebo and garden area during the on-site assessment.</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>Woodside Manor submitted HCBS-compliant documentation that demonstrates people’s rights to control personal resources. During interviews, people receiving services reported they are able to access personal funds when they request without any limitations.</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 type="checkbox"/> Observation made during on-site visit</p> <p>Woodside Manor submitted HCBS-compliant documentation that demonstrates people’s right to privacy is maintained.</p>	Compliant
The setting ensures people’s dignity and respect.	Compliant

<input checked="" type="checkbox"/> Compliant documentation submitted with attestation <input checked="" type="checkbox"/> Observation made during on-site visit <p>Woodside Manor submitted HCBS-compliant documentation that demonstrates people are treated with dignity and respect. Staff were observed respectfully interacting with people. People reported during interviews that they rate their services as, “As expected” and “Better than I expected.”</p>	
<p>The setting ensures people’s freedom from coercion and restraint.</p> <input checked="" type="checkbox"/> Compliant documentation submitted with attestation <input checked="" type="checkbox"/> Observation made during on-site visit <p>Woodside Manor submitted HCBS-compliant documentation that demonstrates people are free from coercion and restraint. During the on-site assessment, there was no evidence of coercion or restraint. People were observed coming and going at their leisure.</p>	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 <p>People receiving services interviewed confirmed they are aware of community happenings and events. Woodside Manor is located on the edge of a small rural town, with limited transportation and in-town options for shopping. Staff will support people to arrange transportation options to attend community events and activities. People reported having a variety of activities to choose from, including transportation options to off-site activities. Staff reported that people actively participate in developing the community activities and events calendar through a monthly resident council meeting.</p>	Compliant

Pictures of the HCBS setting



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.