

HCBS Final Rule Evidentiary Package

Trinity Terrace Assisted Living



Setting information

Setting name: Trinity Terrace

Street address: 3330 213th St W Farmington, MN 55024

Phone: (952)225-9916

ID # A802044200

Setting website, if applicable:

[Farmington Health Services Trinity Campus website](#)

Date of site visit: 5/16/2024

Waiver service type

Waiver	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 service

Reason for heightened scrutiny

Prong type	Name of institution
Prong 2 Located adjacent to a Public Institution	Trinity Care Center

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

General summary

Geographic information:

Trinity Terrace is a licensed assisted living facility, located on the Farmington Health Services campus, a senior living community in Farmington, MN. The campus offers other services, including skilled nursing and memory care and various outpatient therapies. Farmington is located in southeast Minnesota, in Dakota County. As of the 2020 census, Farmington had a population of 26,632.

Trinity Terrace is one of two assisted living building on the continuity of care campus. Trinity Terrace serves people with funding through the Elderly Waiver and private pay. The second assisted living, Trinity Suites is an assisted living with memory care where residents pay privately for their services and does not require heightened scrutiny.

This setting is located in a suburban, residential area, with shopping, restaurants, and other services nearby. The setting is also close to several parks.

Trinity Terrace has 54 units and are currently serving 45 individuals. 6 people are using their Elderly Waiver for customized living services.

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 MN Department of Health and meet all of the requirements and standards of the Assisted Living licensure, [Minn. Stat. 144G](#) or meet an exemption under [Mn Statute 256S.20 Subdivision 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 \(including 24-hour customized living\)](#)

<p style="text-align: center;">HCBS Rule requirement</p>	<p style="text-align: center;">Compliance determination</p>
<p>Interconnectedness between the facility and the setting in question, including administrative or financial interconnectedness, does not exist or is minimal.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> State license requirements: As required under Mn Statute 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.” <p>Narrative:</p> <p>Trinity Terrace is one of several settings on the continuity of care campus. It is a licensed assisted living facility, and although Trinity Terrace is a separate building from the skilled nursing facility, they are connected by a lobby and hallway.</p> <p>Per interview with the Licensed Assisted Living Director, the campus administrator has authority over the whole campus. Trinity Terrace has its own Assisted Living Director who has authority over the nursing and direct care staff in the assisted living setting. The skilled nursing facility has its own staff and management.</p>	<p>Compliant</p>

<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.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with direct care staff. <input checked="" type="checkbox"/> Review of training policy and procedure(s). <input checked="" type="checkbox"/> State license requirements: As required under Mn Statute 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.” <p>Narrative:</p> <p>Management and staff both reported that some staff do work in other buildings on the campus. However, the staff that do work in several settings on the campus are trained on HCBS rule and how to provide supports that follow the HCBS requirements and person-centered care. These cross-trained staff would be scheduled to work in only one site per shift. All staff receive annual training on the HCBS setting rule through a company called Educare.</p>	<p>Compliant</p>
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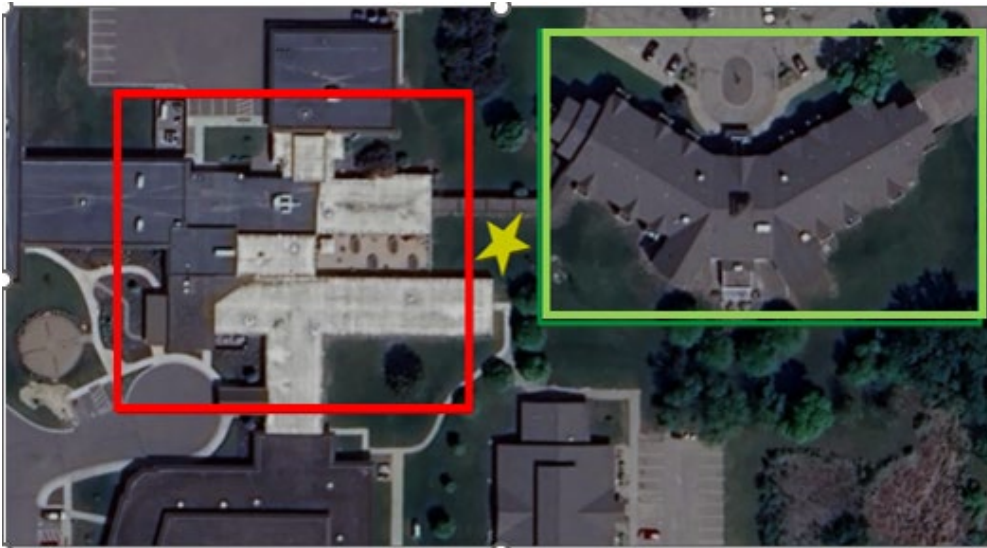
<p>Participants in the setting in question do not have to rely primarily on transportation or other services provided by the facility setting to the exclusion of other options.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with direct care staff. <input checked="" type="checkbox"/> Review of transportation policy and procedure(s). <input checked="" type="checkbox"/> State license requirements: As required under Mn Statute 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.” <p>Narrative:</p> <p>Per interviews with administrative staff, residents at Trinity Terrace use a variety of types of transportation. Some residents still drive, but most of the people in the setting take rides through Uber or Dial-a-Ride services through Red Apple Transit. Residents are given this information when they move in and again if they request it or need support setting up a ride. Family often provides transportation as well. Trinity Terrace transportation policy and procedure was reviewed and is compliant.</p> <p>During interviews with the residents, they stated they were aware of the different transportation options, and that staff help them access transportation when they require support.</p>	<p>Compliant</p>
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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.



Aerial View of campus

Narrative:

Trinity Terrace provides their services in a building that is separate from the nursing facility. In the aerial view shown, the red square is indicating the nursing facility's location, while the green rectangle shows the location of Trinity Terrace. Though they operate in separate buildings, they are connected by walkway as indicated by the yellow star on the aerial view photo. At each end of this walkway there is a door that must be opened to enter the other setting. These doors are marked to show that you are leaving one setting and entering the other setting. The door that connects the hallway to nursing facility is shown in the photo below. The second photo is the view when you open the door to the assisted living.



The door that connects the nursing home to Trinity Terrace.



The view from the open door of the walkway to the assisted living.

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
<p>The setting is selected by the individual from among a variety of setting options including non-disability specific settings.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> Health plan and Lead Agency Review support plan audits: As required under Mn Statute 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;” <p>Narrative:</p> <p>Case managers are required under State statute to offer and document all available options for living arrangements in the person’s support plan.</p> <p>The residents interviewed said they chose the setting they were going to live in. Some residents chose this setting to be close to family. Other residents interviewed reported they grew up in this city and wanted to stay close to home.</p>	<p>Compliant</p>

<p>The setting facilitates individual choice regarding services and supports, and who provides them.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure(s). <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 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.” <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant. The Assisted Living Director confirmed during the interview that the staff are trained annually on the requirements of the HCBS rule, as well as person centered principles. Staff are also trained on the Assisted Living Bill of Rights, which includes information on person-centered care and freedom to choose who provides their services. This was demonstrated through a copy of an annual training checklist.</p> <p>Residents interviewed said that they can choose which doctors they use. One man said this about his doctor, “I have had the same doctor for many years, don’t see any reason to change now”.</p>	<p>Compliant</p>
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<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>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of written lease or residency agreement <input checked="" type="checkbox"/> State license requirements: This setting submitted a compliant Assisted Living lease/contract as required under MN Statute 144G.50 – 144G.57. MN Statute 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. <p>Narrative:</p> <p>Administrative staff confirmed during interview that residents receive a copy of the contract for review prior to signing and/or moving into the setting. The contract was sent to the state to review, and it was compliant with the state’s landlord tenant laws and HCBS requirements.</p> <p>During the interviews with residents, they said they were active in the meeting when they moved in and remember getting a copy of the documents they signed, including a lease.</p>	<p>Compliant</p>
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<p>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.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Observation of lockable unit doors during on-site visit <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 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) <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant. Locks were observed on all the apartment doors in the setting. The resident handbook details how each person has a right to a key, and that only staff that need access to their apartments have a key. Staff are trained annually on the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights.</p> <p>Residents interviewed said they can lock their door when they want privacy or are away. The residents interviewed reported that staff always knock before entering, and only use their key if it’s necessary.</p>	<p>Compliant</p>
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<p>The setting facilitates that a person, who shares a bedroom/unit, is with a roommate of their choice.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 144G.91, “Residents have the right to choose a roommate if sharing a unit.” <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant Staff interviewed stated that no one shares an apartment unless they are related or married and per their choice. Residents interviewed do not share their apartment and reported that they have never been asked to share their apartment. Staff are trained annually on the requirements of the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights.</p>	<p>Compliant</p>
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<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>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Observation of residents’ units during on-site visit <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 144G.91, “Residents have the right to furnish and decorate the resident's unit within the terms of the assisted living contract.” <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant . During the interview the administrator stated that people are able and encouraged to bring their personal items to make their apartment “theirs” and reflect their own taste. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights. Staff are trained annually on the requirements of the HCBS Rule.</p> <p>Decorations in the apartments of the people interviewed were unique and reflected their personal preferences. One of the people interviewed reported that one of the framed paintings was painted by his brother and he really liked looking at it on the wall. Another resident had a lot of silk flowers and other flower decorations and stated, “I love flowers. Flowers everywhere is what I like”.</p>	<p>Compliant</p>
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A resident's apartment decorated with flowers because she loves them.



Flower wreath on a resident's apartment door

<p>The setting provides people the freedom and support to control their daily schedules.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 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." <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant Staff are trained annually on the requirements of the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights. The resident handbook was reviewed, and it informs residents that they have autonomy and can make choices about their schedule. Administration and direct care staff both stated during the interviews that they take people’s preferences into account when they have services that need to be performed.</p> <p>One resident interviewed said that he feels he controls his schedule and doesn’t feel like has to do anything at certain times. He said he knows certain things like medications have to be on a schedule but otherwise feels he controls his own schedule. He said he is a “homebody” and prefers to stay home most of the time”.</p> <p>Another person interviewed said “I have a weird sleeping schedule. Sometimes I get up at 3 am and am tired when they want to give me a shower or do other things with me.” She said staff are very flexible and let her reschedule cares, if needed. She said she has a schedule she likes and feel like she controls what she does each day.</p>	<p>Compliant</p>
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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 requirements: As required under MN Statute 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."

Narrative:

Trinity Terrace's policy and procedure was reviewed and is compliant Staff are trained annually on the requirements of the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights.

Administration and staff confirm during the interviews that people have access to food at any time. In addition to the three meals and two snacks offered daily, administration confirmed that the setting provides snacks daily and people can store and prepare food in their own apartment.

Staff reported that if a person requests food between meals that there are options, like sandwiches, they can offer them. If a resident misses a meal, staff will save their meals for them until they return.

When interviewed, residents said they know that they can ask staff for food. They also reported staff have saved their meals when they weren't home, even bringing them to their apartment and putting them in the refrigerator.

Compliant



Full kitchen with refrigerator and stove.



Snacks set out in the common area.

<p>The setting allows people to have visitors at any time.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Observation of people coming and going during on-site visit <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 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): <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant Staff are trained annually on the requirements of the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights. The resident handbook states visitors are welcome at any time. It also states that residents’ guests are welcome for meals as well, and tables can be reserved for them with advance notice.</p> <p>Administration and staff confirmed during the interviews that residents can have visitors at whatever time they choose and for however long they would like. The residents interviewed said they like to have their guests in their apartments, unless it’s a bigger group of people. One person said, “If it’s a lot of people then we go out in the lounge or into the dining room”.</p>	<p>Compliant</p>
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Lounge area with seating and a fireplace where people can sit with visitors if they choose.

<p>The setting provides opportunities for people to volunteer or seek employment and work in competitive integrated settings.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Health plan and Lead Agency Review support plan audits: As required under Mn Statute 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.” <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 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.” <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant Staff are trained annually on the requirements of the HCBS Rule. Administration and staff reported during interviews that there are not residents who choose to volunteer or work at the setting at this time. The resident handbooks says that the setting will have “flexible schedules or accommodations for residents’ work/volunteer schedules as appropriate and delivering services in a way that will complement their schedules.”</p> <p>Residents interviewed said they have no desire to work and want to enjoy retirement.</p>	<p>Compliant</p>
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<p>The setting is physically accessible to the individual.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Observation made during on-site visit <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 144G.11 “Assisted living facilities:(1) are subject to and must comply with chapter 504B;” and MN Statute 363A.10, Subdivision 1. Reasonable modifications/accommodations. “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.” <p>Narrative:</p> <p>Trinity Terrace’s policy was reviewed and is compliant. Staff are trained annually on the requirements in the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights. Administration and staff report the setting is fully accessible to the residents. They stated if a resident needs an accommodation they just need to ask. Accommodations such as grab bars, shower chairs, wheelchair accessible kitchens and bathrooms are available to residents. Observed grab bars and handrails in resident apartments and hallways. One resident who uses a wheelchair reported that there are “no problems getting around. Another person said it was “easy to get around and use things” in the setting.</p>	<p>Compliant</p>
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Grab bar in a resident's bathroom

<p>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.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input type="checkbox"/> Review of person’s support plan if a rights modification is in place. <input checked="" type="checkbox"/> N/A. No residents at this setting, enrolled in Elderly Waiver, have a need for a Rights Modification at this time. <input checked="" type="checkbox"/> State license requirements: As required under Mn Statute 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.” <p>Narrative:</p> <p>Administrative/direct support staff report the setting has/ does not have residents on Elderly Waiver with a Rights Modification at this time. However, the resident handbook states that if there was a restriction of a person’s rights, that a Rights Modification form and process must be used and placed in the person’s file with their support plan.</p>	<p>Compliant</p>
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<p>The setting provides people opportunities to access and engage in community life to the same degree as individuals not receiving Medicaid.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure, activity calendar(s) <input checked="" type="checkbox"/> Observation of residents’ units during on-site visit <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 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." <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant. Staff are trained annually on the requirements in the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights. When a resident moves in, they are given an assessment about what their interests are, including activities that they are interested in participating in. In addition, there are monthly meetings where residents can voice their opinions and make suggestions about activities. Residents are informed about the events and activities that are taking place via calendars that they are given each month. This calendar is also posted in the elevator and on bulletin boards in the setting. Staff assist residents in setting up transportation for events they are interested in attending. The residents are active in their communities. Residents can participate in activities in conjunction with the local senior center, Rambling River Center. This allows people to choose additional activities that match their individual interests. Staff assist them to sign up and arrange transportation so they can attend these events. The senior center has a wide variety of options to match resident interests.</p> <p>Examples of community activities offered by the setting:</p> <ul style="list-style-type: none"> Walks through the neighborhood Bike rides around the neighborhood A patriotic Dinner at Farmington High School Rotary Christmas Lunch at St. Michael's Church 	<p>Compliant</p>
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<p>Hardware store trips</p> <p>Examples of activities offered through the Rambling River Center for May and June:</p> <ul style="list-style-type: none"> VFW Steak Fry Arts and Crafts Fair Tasty Tuesdays-Restaurants trips Plays at the Bloomington Arts Center and Plymouth Playhouse Johnathon Padelford Riverboat Picnic Cruise Model Railroad Club Display Fitness/Sports classes like Walking, Biking, Zumba, Yoga Games like Pickleball and Ping Pong Clubs like garden clubs and book clubs Live Music in the Park Community Food truck event <p>Residents also access the community with family and friends. One of the residents that still drives leaves the setting almost every day. He also drives his friends from the setting to various places.</p> <p>Examples of activities that people attend with friends and family:</p> <ul style="list-style-type: none"> Special occasion celebrations like birthdays, graduations, anniversaries, and baby showers Movies Restaurants Beauty shops and barber shops Happy Hours Shopping <p>The setting offers on-site activities as well. Examples of onsite activities include:</p> <ul style="list-style-type: none"> Bingo Arts and Crafts Religious services Exercise Card games Movies <p>Residents interviewed reported they have a lot of choices in what activities they want to participate in. One resident said, "There is always something going on</p>	
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around here". People interviewed said they were happy with the amount of community access they had.



Bulletin board where activities and other events are listed

JUNE CALENDAR

Monday	Tuesday	Wednesday	Thursday	Friday
3 8:00 Day Old Bread 8:00 Coffee Guys 8:00 Core 8:00 Walk/Bike Club 8:30 Zumba Gold 12:00 Recycled Cards 1:00 Dutchmen Foodline for Trade Equipment	4 8:00 SAIL 8:00 Ping/Pong 8:00 Chair Yoga 8:00 Women's 8:30 Coffee 8:00 Woodbarrens 8:00 Woodball Lessons	5 8:00 The Foot Nurse 8:00 Day Old Bread 8:00 Coffee Guys 8:00 Orientation 8:30 Move with Mary 1:00 Cards 1:00 Coloring 1:00 Yoga	6 8:00 Pirochke 8:00 Core 8:45 Fitness Clr 8:45 Orientation 9:45 Alive and Kickin	7 8:00 Coffee Guys 8:00 SAIL 8:00 Chair Yoga 8:00 Bingo 10:30 Yoga
10 8:00 Day Old Bread 8:00 Coffee Guys 8:00 Advisory Board 8:00 Core 8:00 Zumba Gold 12:00 Recycled Cards 1:00 Dutchmen	11 8:00 SAIL 8:00 Ping/Pong 8:00 Chair Yoga 8:00 Women's 8:00 Coffee 8:00 Woodbarrens 8:00 Woodball Lessons	12 8:00 Day Old Bread 8:00 Coffee Guys 8:30 Move with Mary 1:00 Cards 1:00 Coloring 1:00 Yoga	13 8:00 Redhead 8:00 Creamery 8:00 Core 8:00 Fitness Clr 8:00 Orientation 8:00 Meditation 8:00 Music/Railroad Club	12 8:00 Coffee Guys 8:00 SAIL 8:00 Chair Yoga 8:00 Bingo 10:30 Yoga
17 8:00 Day Old Bread 8:00 Coffee Guys 8:00 Advisory Board 8:00 Core 8:00 Zumba Gold 12:00 Recycled Cards 1:00 Dutchmen	18 8:00 SAIL 8:00 Ping/Pong 8:00 Chair Yoga 8:00 Women's 8:00 Coffee 8:00 Woodbarrens 8:00 The Open Door Food Distribution	19 CLOSED	20 8:00 Pirochke 8:00 Core 8:00 Fitness Clr 8:45 Orientation 9:45 Music Book Club/The Next Chapter	21 8:00 Coffee Guys 8:00 SAIL 8:00 Chair Yoga 8:00 Bingo 10:30 Yoga
24 8:00 Day Old Bread 8:00 Coffee Guys 8:00 Advisory Board 8:00 Core 8:00 Zumba Gold 12:00 Recycled Cards 1:00 Dutchmen	25 8:00 SAIL 8:00 Ping/Pong 8:00 Chair Yoga 8:00 Women's 8:00 Coffee 8:00 Woodbarrens	26 8:00 Day Old Bread 8:00 Coffee Guys 8:00 Food Newsletter 8:30 Move with Mary 12:30 Much 'n' Lunch 1:00 Cards 1:00 Coloring 1:00 Yoga	27 8:00 Pirochke 8:00 Core 8:00 Fitness Clr 8:45 Orientation 9:45 Music Book Club/The Next Chapter	28 8:00 Coffee Guys 8:00 SAIL 8:00 Chair Yoga 8:00 Bingo 10:30 Yoga

Senior center calendar

5 2:30 Movie - Rec Room	6 9-10 Farmington Library - Dining Rm 9-45 Stretch & Exercise - Rec Rm 10-10 - Bike Rides 2:00 Mother's Day Tea	7 10:00 Bible Study - Library 10:00 Men's Choir - Sun Rm 1:00 Bell Choir - Library 2:00 Trinity Lutheran Church at Care Center 2:00 Blank Slate game - library Happy Birthday Andy	8 8:00 Grocery Orders 9:30 Castle Rock Bank 1:30 Bingo w/ Andrea (25 cents) 3:00 Walk with Linda Happy Birthday Arthur	9 1:00 Rummikub - Library (resident Ind) 8:00 Sew & Stitch Club - Library 1:30 Farmington Lutheran - Dining Rm	10 10:00 Rotary B Communion - Library 10:30 Euchre - res. Rm 10:30 Acrylic Painting with Lita - Sun Rm 2:00 Bingo (25 cents, res. Ind)	11 2:00 21 Card Game - Sun Room
12 2:30 Movie - Rec Room	13 9-45 Stretch & Exercise - Rec Rm 10-10 - Bike Rides 1:00 500 Cards - library 2:45 Cappuccino & Coffee Chat	14 10:00 Bible Study - Library 10:00 Men's Choir - Sun Rm 1:00 Hymn Sing 2:00 Cribbage - Library 3:00 Manicures - Sun Rm	15 8:00 Grocery Orders 9:30 Castle Rock Bank 1:30 Bingo w/ Andrea (25 cents) 3:00 Walk with Linda	16 9-45 Stretch & Exercise - Rec Room 1:00 Quilt Crossword - Library 2:30 happy Hour with Dave and Betty Happy Birthday Loretta	17 10:00 Rotary B Communion - Library 10:30 Euchre - res. Rm 10:30 Acrylic Painting with Lita - Sun Rm 2:00 Bingo (25 cents, res. Ind)	18 2:00 21 Card Game - Sun Room
19 2:30 Movie - Rec Room	20 9-45 Stretch & Exercise - Rec Rm 10-10 - Bike Rides 1:00 500 Cards - library 2:00 Memorial Day Service - Care Center 7-45 Birthday Social	21 10:00 Bible Study - Library 10:00 Men's Choir - Sun Rm 1:00 Bell Choir - Library 2:00 Trinity Lutheran Church at Care Center	22 8:00 Grocery Orders 9:30 Castle Rock Bank 1:30 Bingo w/ Andrea (25 cents) 3:00 Walk with Linda	23 9-45 Stretch & Exercise - Rec Room 2:00 Resident and Staff Meeting before 8 o'clock - dining room Happy Birthday Sharon	24 10:00 Rotary B Communion - Library 10:30 Euchre - res. Rm 10:30 Acrylic Painting with Lita - Sun Rm 2:00 Bingo (25 cents, res. Ind)	25 2:00 21 Card Game - Sun Room
26 2:30 Movie - Rec Room	27 9-45 Stretch & Exercise - Rec Rm 10-10 - Bike Rides 1:00 500 Cards - library 2-45 Coffee Chat	28 10:00 Bible Study - Library 10:00 Men's Choir - Sun Rm 1:30 Quiddler - Library 3:00 Manicures - Sun Rm	29 8:00 Grocery Orders 9:30 Castle Rock Bank 1:30 Bingo (25 cents, res. Ind) 3:30 Walk with Linda Happy Birthday Arla	30 1:00 Rummikub - Library (resident Ind) 1:00 Sew & Stitch Club - Library 2:30 Happy Hour	31 10:00 Rotary B Communion - Library 10:30 Euchre - res. Rm 10:30 Acrylic Painting with Lita - Sun Rm 2:00 Bingo (25 cents, res. Ind)	Commit your way to the Lord, trust in him, and he will do it. Psalm 37:5

Trinity Terrace activity calendar

<p>The setting supports the person’s control of personal resources to the same degree as individuals not receiving Medicaid HCBS.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 144G.91, "Residents have the right to control personal resources." <p>Narrative:</p> <p>Trinity Terrace’s policy/procedures are compliant. There is a policy and procedure for the management of resident funds as well as one for safekeeping of resident possessions. Staff are trained annually on the requirements of the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights. The Assisted Living Bill of Rights is given to residents at move-in and informs them of this right. Residents interviewed did not have their finances managed by the setting. One resident interviewed said they manage their own finances, and another said family members assist them.</p>	<p>Compliant</p>
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<p>The setting ensures people’s right to privacy.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Observation during on-site visit <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 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." <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant Staff are trained annually on the requirements of the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights. Administrator and staff report the setting ensures residents privacy by providing personal cares in residents apartment or in private areas. Staff are trained to not share private information about residents in hallways or other common areas. Observed locks on all of the doors of the apartments. Observed staff knocking and waiting for a response before entering a resident’s unit.</p> <p>When residents were asked during the interviews if they feel staff respect their privacy, one resident answered, “Oh yes!” Another resident confirmed that they feel their privacy is protected. He stated that sometimes when ambulances come to the setting, staff will not tell others about the reason the ambulance is there or who is having a medical issue. Staff tell him that information like that is not</p>	<p>Compliant</p>
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<p>for them to tell, and that they are protecting people’s privacy by not disclosing it. Residents said that their personal cares are done in a private setting.</p>	
<p>The setting ensures people’s dignity and respect.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Observation during on-site visit <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 144G.91, "Residents have the right to be treated with courtesy and respect, and to have the resident's property treated with respect." <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant The administrator stated that all staff are trained annually on the requirements of the HCBS Rule, including the requirement to treat every resident with dignity and respect. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights.</p> <p>During the onsite visit, a resident was observed exiting their apartment not completely dressed and the staff discretely got the resident back into their apartment to assist them. Administrator arranged interviews with residents at times that wouldn’t disrupt lunch, respecting the fact that residents like eating with their friends in the dining room. When asked if the staff treated them with respect, the residents said “Yes. They treat us with respect and then we treat them with respect”. Another responded, “Yes, they are so nice to us!”</p>	<p>Compliant</p>

<p>The setting ensures people’s freedom from coercion and restraint.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Observation during on-site visit <input checked="" type="checkbox"/> State license requirements: As required under Mn Statute 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. And Mn Statute 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.” Mn Rule 9555.7200 Subp.2, "Abuse" means: the intentional and nontherapeutic infliction of physical pain or injury, or any persistent course of conduct intended to produce mental or emotional distress”. The Elderly Waiver plan states, customized living services must, “Ensure that participants are treated with dignity and respect and are free from coercion and restraint.” <p>Narrative:</p> <p>Staff are trained annually on the requirements of the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights. Residents get a copy of the Assisted Living Bill of Rights which details their right to be free of coercion and that restraints are not permitted.</p> <p>Residents interviewed said that they never feel like they are being “made to do something”. Residents reported that they know it is their right to not be restrained.</p>	<p>Compliant</p>
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<p>The setting optimizes individual initiative, autonomy, and independence in making life choices, including daily schedule and with whom to interact.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Interview(s) with administrative staff. <input checked="" type="checkbox"/> Interview(s) with residents. <input checked="" type="checkbox"/> Review of setting’s policy and procedure <input checked="" type="checkbox"/> Observation made during on-site visit. <input checked="" type="checkbox"/> State license requirements: As required under MN Statute 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.” <p>Narrative:</p> <p>Trinity Terrace’s policy and procedure was reviewed and is compliant Staff are trained annually on the requirements of the HCBS Rule. The administrator confirmed during the interview that residents are afforded this right as required in the Assisted Living Bill of Rights.</p> <p>Staff interviewed reported that residents are free to make their own life choices and choose who they want to spend their time with. One staff person reported, “Even if I don’t agree with their choices, this is THEIR life and I will support their decisions”. Another staff reported, “They are the boss of their life”. Staff also reported that residents seem to find their own group of friends and that they are not ever restricted from accompanying the people they choose.</p> <p>Residents interviewed said they felt they were able to have the schedule they want. A resident who likes to get up early and nap in the afternoon said, “The staff know that is my time to nap and they don’t bother me until late afternoon or early evening when they know I will be awake.”</p> <p>Another resident reported in their interview that they weren’t “into doing a million things a day’. They reported that staff respect their decisions.</p>	<p>Compliant</p>
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Additional pictures of the HCBS setting



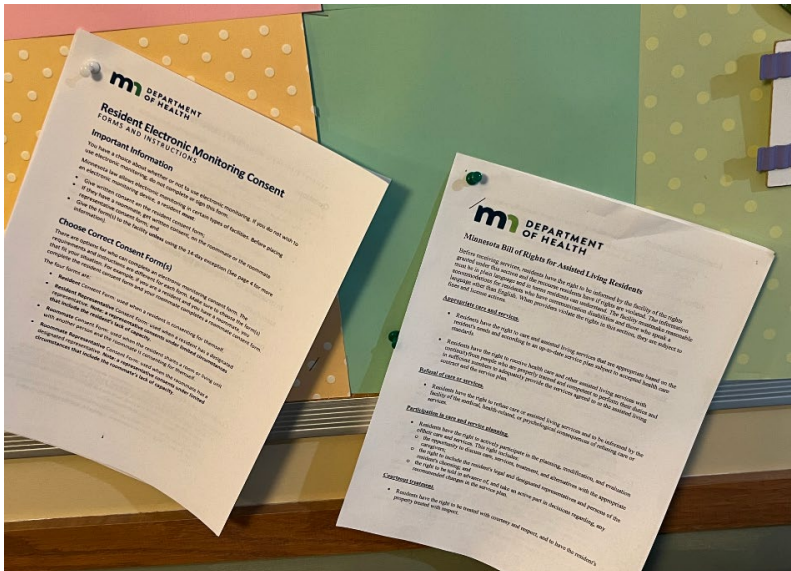
Aviary and the birds in the lobby of Trinity Terrace



Chapel inside the setting



Dining area



Assisted Living Bill of Rights posted for residents

Public comment summary

The Minnesota Department of Human Services (DHS) did not receive public comments for this setting. DHS sought public comment from 8:00am on July 3, 2024, to 4:00pm on August 2, 2024, 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 - 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 [July 2, 2024, eList announcement](#)
- Notification to providers via email
- Notification to managed care organizations and Area Agencies on Aging (AA)
- Notification to long-term care ombudsman office via eList announcement

Minnesota's recommendation

Date of recommendation: August 5, 2024
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.