

# HCBS Final Rule Evidentiary Package

Cornerstone Villa Senior Living



## Setting information

Setting name: Cornerstone Villa Senior Living

Street address: 1000 Forest St. Buhl, MN 55713

Phone: 218-258-3253

ID # 1346393642

Setting website, if applicable:

[Cornerstone Villa](#)

Date of site visit: 1/16/2026

## Funding and waiver service type

Waiver	Service type
<input checked="" type="checkbox"/> Elderly Waiver (EW) <input type="checkbox"/> Brain Injury (BI) <input type="checkbox"/> Community Access for Disability Inclusion (CADI) <input checked="" type="checkbox"/> Private pay or other third-party insurance <input type="checkbox"/> Pending HCBS service provider. Not yet approved for waiver funding pending heightened scrutiny determination.	Customized living service

## Reason for heightened scrutiny

Prong type	Name of institution
Prong 1 Located in a Public or Private Institution	Cornerstone Villa (Skilled Nursing Facility)

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

## General summary

Cornerstone Villa Senior Living is a licensed assisted living setting located within a continuum of care campus that includes a skilled nursing care facility that provides transitional services as well. Cornerstone Villa is owned and operated by Forest Health Services Incorporated, a 503(c) nonprofit organization.

### Geographic information:

Cornerstone Villa Senior Living is located in the city of Buhl, Minnesota in St. Louis County. Buhl is a rural community located in the upper northwest region of Minnesota, known as the Iron Range, about an hour away from the Canadian border. As of 2026 Buhl had a population of 945 people.

The setting is located in a residential neighborhood, but close to parks and local businesses, as the size of the city is 3.5 square miles.

### Number of people served

Cornerstone Villa Senior Living is licensed to serve 10 people. At the time of the site visit, they were serving 9 residents. 5 of those residents are enrolled in Elderly Waiver, and 4 are privately paying.

## 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 [Minn. Stat. 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 tasks (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 in the Community Based Services Manual (CBSM):

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

The CBSM provides the following requirements for customized living services:

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

HCBS Rule requirement	Compliance determination
<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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.10</a>, “Each assisted living facility must employ an assisted living director licensed or permitted by the Board of Executives for Long Term Services and Supports.”</li> <li><input checked="" type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722</a>, “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.”</li> </ul> <p>Narrative:</p> <p>Per interview with the assisted living director, the campus administrator has oversight of the entire campus, but the management of the assisted living is separate from skilled nursing facility. The assisted living director oversees all the staff at the assisted living, while the director of nursing has oversight of all the staff in the skilled nursing facility.</p>	<p>Compliant</p>

HCBS Rule requirement	Compliance determination
<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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with direct care staff.</li> <li><input checked="" type="checkbox"/> Review of training policy and procedure(s).</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.60</a>, “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.”</li> <li><input type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 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: (12) be served by people who are properly trained and competent to perform their duties;”</li> </ul> <p>Narrative:</p> <p>Per interviews with the Assisted Living Director, assisted living staff and other validation methods listed above, Cornerstone Villa has its own staff that are separate from the staff at the skilled nursing facility. Occasionally, staff from one setting may cover a shift in the other setting. Staff are never scheduled to work at both settings at the same time. All staff that work in both settings receive Home and Community Based Services Rule specific training in a manner consistent with the HCBS settings regulations. This training is outlined in the staff orientation information submitted by the provider.</p>	<p>Compliant</p>

<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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with direct care staff.</li> <li><input checked="" type="checkbox"/> Review of transportation policy and procedure(s).</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.41</a>, “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.”</li> <li><input checked="" type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 256S.09</a>, “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;”</li> </ul> <p>Narrative:</p> <p>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 Cornerstone Villa. The setting does not have a setting owned vehicle, but the setting has a list of transportation providers and contact information available to residents. Some of the transportation providers listed are Northern Access, Aspen Health transportation, Arrowhead Transit, Abacus Lift, Cozy Transport and Samaritan transportation. In addition, there are four different taxi services listed. The transportation list is given to each resident upon move-in, when information on the document is changed or at the request of the resident. Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights at intake and then it is reviewed with them annually.</p> <p>Interviews with assisted living director, staff and residents determined that staff and residents are aware of this resource and it is used frequently. Residents stated during interviews that the assisted living director often helps set up transportation for them. One resident said, “I</p>	<p>Compliant</p>
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HCBS Rule requirement	Compliance determination
<p>really feel like any of the staff would help me if I asked for help with transportation” Other transportation options people use include community volunteers, families and religious organizations like churches.</p> <p>The setting has a transportation policy that states “To ensure residents are informed of, and supported in accessing, community activities and available transportation services in accordance with Minnesota Statutes Chapter 144G, supporting resident choice, independence, social engagement, and quality of life. The facility will provide residents with a current community calendar and clear, accessible information regarding available transportation services, both facility-arranged and community-based. Information will be communicated in a manner that accommodates residents’ needs, preferences, and abilities, and supports informed decision-making”.</p>	

The setting provides HCBS services in a space that is distinct from the space that institutional services are provided.

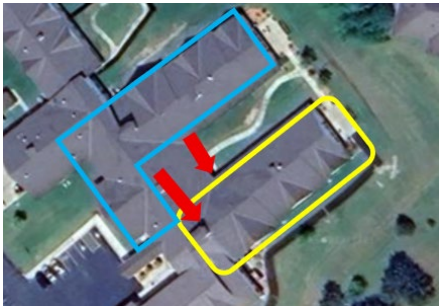
Compliant

Validation methods:

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

Narrative:

Cornerstone Villa Senior Living provides customized living services in a space that is distinct from the space used by the skilled nursing facility. In the aerial view below, the assisted living setting is indicated through the yellow outline. The skilled nursing facility is indicated by the blue outline. The red arrows show the two areas where assisted living connects to the skilled nursing facility. Signage throughout the campus clearly identifies which building you are in. Cornerstone Villa Senior Living has a separate entrance with signage and a dedicated parking area separate from the skilled nursing facilities.



*Aerial view of campus*



*Signs showing how to get to each setting*

**HCBS Rule requirement**

**Compliance  
determination**

*Connections to skilled nursing facility*



*First connection through this door*



*Second connection through this door*

## **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"> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><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.</li> <li><input checked="" type="checkbox"/> Health plan and Lead Agency Review support plan audits: As required under <a href="#">Minn. Stat. 256B.0911, subd. 29</a>, “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;”</li> </ul> <p>Narrative:</p> <p>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, one person confirmed that they toured other facilities and made the choice to move into Cornerstone Villa Senior Living. They said they wanted to be closer to their daughter. When another resident was asked about their choice to live here, they said “I have lived on the Iron Range since my husband got a job in the mines here. I wanted to stay in this area, and a lot of my friends were already here. That’s why I chose here.” Another resident, when asked if they wanted to move, said “Well no, I definitely don’t want that!”</p> <p>The most recent care and support plans for people interviewed were provided. The documents noted that the residents were asked recently about their satisfaction with their living environment. Each resident’s plan had documentation that they did not want to make any changes and were satisfied living at Cornerstone Villa Senior Living.</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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure(s).</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91, subd. 24</a>, “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.”</li> <li><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722, subd. 2</a>, “(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;”</li> <li><input type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144A.44, subd. 1</a> “(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;”</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it has been determined that Cornerstone Villa is compliant with this requirement. The Lease Agreement/Contract includes the following statement “Tenant is free to make arrangements for health-related and supportive services with the appropriate provider of Tenant’s choice, whether or not Landlord has a relationship with that provider. ALD confirmed during the interview that if a person has an appointment outside of the setting, staff are flexible and will reschedule personal cares, save their meals and otherwise accommodate appointments with outside</p>	<p>Compliant</p>
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HCBS Rule requirement	Compliance determination
<p>providers. Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights at intake and reviewed with them annually.</p> <p>During interviews, residents confirmed that they knew they could choose to use providers outside of the assisted living for services. One stated “I like that the doctor comes right to me! Especially in the winter. I’m not super picky about doctors. But if I didn’t like one of them, I know that I could switch to another one. Honestly, that’s never happened though.” Another resident shared that they primarily use the providers on site, then added “However, I see specialists that are out of town that my daughter takes me to. I really like that doctor.”</p>	

HCBS Rule requirement	Compliance determination
<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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of written lease or residency agreement.</li> <li><input checked="" type="checkbox"/> State license requirement: This setting submitted a compliant Assisted Living lease/contract as required under <a href="#">Minn. Stat. 144G.50 – 144G.57</a>. <a href="#">Minn. Stat. 144G.11</a> 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.</li> <li><input type="checkbox"/> State statutory requirement: This setting submitted a compliant written lease/contract as required under <a href="#">Minn. Stat. 325F.722, subd. 8</a>. “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.”</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, Cornerstone Villa has demonstrated that they are compliant with this requirement.</p> <p>Residents are notified in the Cornerstone Living Resident Handbook that they will be required to sign a lease. Cornerstone has a policy listed under Resident Rights-Contracts which states that residents must be provided with a copy of the Lease Agreement/Contract prior to receiving services for their review. It must contain all the required elements including eviction protections and appeal information.</p> <p>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.</p> <p>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.</p>	<p>Compliant</p>

<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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> Observation of lockable unit doors during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91, subd. 13</a>, “(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 residents’ 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)</li> <li><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722, subd. 2</a>, “(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.</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, Cornerstone Villa is compliant with this requirement. Cornerstone policy Resident Rights-Privacy states “It is the policy of the organization to ensure that all residents receiving Home and Community Based Services (HCBS) have full privacy, autonomy, and security through the use of lockable doors on their units”. The lease states: “Staff are trained on this right at orientation and annually thereafter.” Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually. Locks were observed on all the residents’ doors in the setting, and interviews with residents confirmed that they knew they had a right to lock their doors and have their own key.</p>	<p>Compliant</p>
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HCBS Rule requirement	Compliance determination
<p>The setting facilitates that a person who <b>shares a bedroom/unit</b>, is with a roommate of their choice.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, “Residents have the right to choose a roommate if sharing a unit.”</li> <li><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722, subd. 2</a>, “(c) The contract must include a statement regarding: (4) a resident's right to choose a roommate if sharing a unit;”</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement.</p> <p>This right is part of the setting’s policy: Quality of Life-Resident Self Determination and Participation. Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p>	<p>Compliant</p>

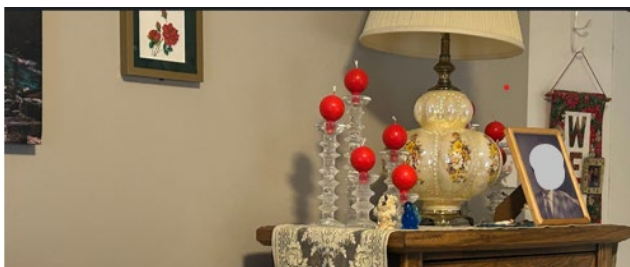
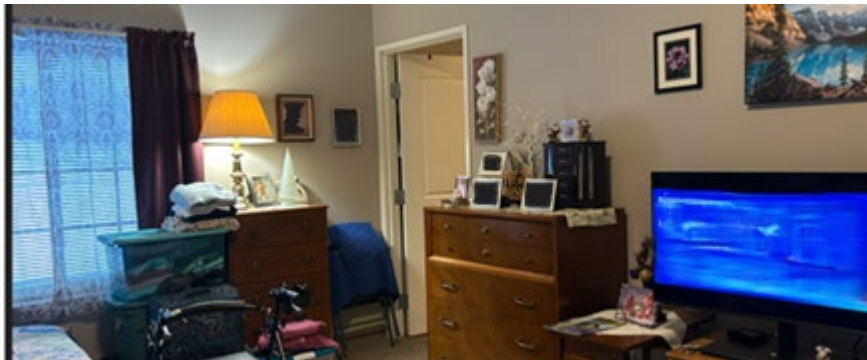
<p>The setting provides people with the freedom to furnish and decorate their bedroom and living unit within the lease or residency agreement.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> Observation of residents’ units during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, “Residents have the right to furnish and decorate the resident's unit within the terms of the assisted living contract.”</li> <li><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722, subd. 2</a>, “(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;”</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>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 resident was excited to show me their collection of salt and pepper shakers that were displayed in a curio cabinet in their living room. They said, “All of those have a story. Either of when I bought them or when I got them as gifts from other people.” Another resident said, “Having my own stuff here makes it feel like home. Obviously, I had to downsize when I moved here, but I have all of my favorite stuff here”.</p>	<p>Compliant</p>
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HCBS Rule requirement

Compliance determination



*Christmas decorations on resident door*



*Personal decorations in resident home*

<p>The setting provides people access to food at any time.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> Observation during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, "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."</li> <li><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722, subd. 2</a>, "(c) The contract must include a statement regarding: (2) a resident's right to access food at any time;"</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. In addition to providing options for breakfast, lunch and dinner, the setting always has snacks in the common kitchen area. Residents can store food in their refrigerators in their unit. Residents can ask staff and receive food at any time.</p> <p>Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually. The lease outlines what meals will be provided, and which other meals can be purchased.</p> <p>Per my interview with the Assisted Living Director, if residents don’t like what is on the menu, there is always alternatives which are detailed on the “Meal Alternatives sheet”. In addition, residents have the option to have items from the “Always Available” food list.</p> <p>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. She stated, “You definitely don’t go hungry here!”</p>	<p>Compliant</p>
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*Kitchenette in resident apartment*



*Menus posted in community kitchen*

HCBS Rule requirement

Compliance determination




*Dining room*



*Snacks are always available in community kitchen*

<p>The setting allows people to have visitors at any time.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> Observation of people coming and going during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, "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):</li> <li><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722, subd. 2</a>, "(c) The contract must include a statement regarding: (3) a resident's right to choose the resident's visitors and times of visits;"</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>Residents can reserve a room if they would like to entertain guests, and there is a guest apartment that can be reserved for guests who want to be there for longer visits.</p> <p>Residents interviewed confirmed that they can have visitors at any time, and that they can visit with them in the area of their choice. One resident stated, “We usually visit here in my room, but if they want to go sit somewhere else, that is fine too.” Another resident stated that their son comes to visit every Monday and that “No one ever seems to have a problem with that.”</p>	<p>Compliant</p>
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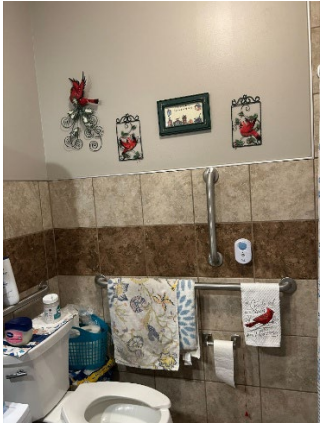
HCBS Rule requirement	Compliance determination
 <p data-bbox="203 604 487 634"><i>Table with guest sign in book</i></p>	

HCBS Rule requirement	Compliance determination
<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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, "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."</li> <li><input checked="" type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 256B.0911, subd. 29</a>, "(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;"</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. The setting’s policy “Tenant Employment and Volunteerism” states, “This organization support client/tenants who choose to seek employment or volunteer opportunities.” It outlines the process of supporting people who want to work. This right is in the Resident handbook. Staff are trained on this policy at orientation and annually after.</p> <p>The assisted living director stated there were no residents at this time that are employed in the community.</p> <p>One resident stated during their interview that they used to work cleaning houses, but added “That’s really hard on the body, now it’s time for my body to rest.”</p>	<p>Compliant</p>

<p>The setting is physically accessible to the individual.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> Observation made during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.11</a>, “Assisted living facilities:(1) are subject to and must comply with chapter 504B;”</li> <li><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722. subd. 8</a>, “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.”</li> <li><input checked="" type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 363A.10, subd. 1</a>, “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.”</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>The setting is all one level, and accessibility features were observed throughout the building, such as railings and grab bars. The setting has a maintenance book that is used to track resident requests for accommodations and repairs.</p> <p>During resident interviews, residents stated that they can get around their units and the building easily. One resident said, “Even when I am in my wheelchair, there are no problems getting around.” Another resident laughed and said that</p>	<p>Compliant</p>
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HCBS Rule requirement	Compliance determination
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the only issue she has in her apartment is that she is so short she can't reach anything that is higher up. She said, "Taller people always seem willing to help me."



*Resident bathroom with grab bars*

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 [Minn. Stat. 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."

Compliant

HCBS Rule requirement	Compliance determination
<p><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722, subd. 2</a>, “(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.”</p> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement.</p> <p>The assisted living director stated they don't have anyone at this time with a modification. She stated that the case managers that work with the residents here are great. The assisted living director stated that there is frequent communication between the setting and the case managers regarding changing needs. They check in often and one drops in for visits from time to time just to see the person.</p>	

<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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure, activity calendar(s).</li> <li><input checked="" type="checkbox"/> Observations during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, "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."</li> <li><input checked="" type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 256S.10, subd. 3</a>, "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;"</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>When residents move in, they are given an assessment by the activity director to determine what their interests are. This information is used to help determine what activities the person may want offered. Activity director and other staff get feedback about activities through conversations with them. More formal feedback is receiving during the resident council meetings. The setting has family council meetings as well and have gotten good ideas for activities from family members.</p> <p>Each resident is given a copy of the monthly activity calendar, and they are posted around the building. Observed a copy of the activity calendar in resident’s home during interview.</p> <p>The residents at Cornerstone Villa have opportunities to participate in activities in the community. Some examples of community activities include:</p>	<p>Compliant</p>
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Concerts at a nearby park  
 Attending St. Louis county fair  
 Community church services  
 Meals at the Knights of Columbus  
 Activities at the senior center  
 Walks around the neighborhood  
 Parades  
 Community exercise classes  
 Meals at restaurants  
 Choir concerts  
 Musicals and plays at local schools  
 Family gatherings and events  
 City Council Meetings  
 Community Art classes  
 Trips to the library  
 Trivia night  
 Snowshoeing  
 Trips to the local greenhouse

Residents go out into the community with friends they have met at the setting. 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. Some of the ladies meet for a sewing group, others meet for card club.

Families and friends come to pick up residents for special occasions such as birthdays, weddings, graduations, baby showers, and other celebrations.

Cornerstone has activities that the community members are invited to attend. They have an annual carnival and classic car gatherings that bring the community to the setting.

Cornerstone has on site activities such as arts and crafts, Bingo, card games, exercise classes, and holiday activities.

During resident interviews, one person shared that she used to like to go out into the community more, but that her limited mobility makes it harder now. Then she stated "My doctor comes here, and church is on T.V. I don't really need to go anywhere else". They said they do like to see what people are selling at craft fairs, especially at churches". During another resident interview, they stated that they get out into the community as much as they want to but added, "It's scary out in the community sometime." Before moving into the assisted living, this

resident lived independently in a community apartment. They said that they like to do community activities but “The best part about being here is that I feel really safe.”

Observed residents in groups talking with one another, and some having coffee with others. There were quiet areas and gathering spaces where there was more socialization.

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”.

January 2026 Community Events						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
				1 6-8 pm mental health Night 510 chestnut street Virginia	2	3 7 pm Morning bird band @ Luke's tavern in Biwabik
4 12-3 pm free meal 510 Chestnut Street Virginia	5	6 630-730 Buhl city council meeting 2 city hall	7 11:45 AM Iron Range women of today lunch meeting at Sportsman's	8 4:30 PM Trivia at discovery center in Chisholm 5 PM-8 PM snowshoe hike at Discovery center 6 PM Axe league 112 Howard st	9 12:30 PM Peer pop up group at cook's country connection	10 9 AM greenhouse yoga at Virginia Greenhouse 1 PM Discovery center movie: All creatures great and small
11	12 6 PM Candle making workshop @ Boomtown in Eveleth	13	14 10 am Rooted nest collective birth stories @ Hibbing library 6 pm Ski and snow show @ Carey Lake	15 5 pm Buhl Senior center monthly meal	16 5 PM Morning Bird band at Nick's bar in Gilbert	17 2 PM Snowshoeing 7-9 "Charlie Parr" performance in Duluth
18 12-3 pm free meal 510 Chestnut Street Buhl Lutheran church service	19	20	21	22 4:30 PM Trivia at discovery center in Chisholm	23 6 pm Music on Chestnut street in Virginia	24
25 3-6 PM live music at Giants Ridge	26	27	28	29 Free at Discovery center Tye Hillhnen 6-730 PM Socialist women of the iron range	30	31

Community activity calendar

HCBS Rule requirement	Compliance determination
<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"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, "Residents have the right to control personal resources."</li> <li><input type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144A.479, subd. 5</a>, "(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."</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. The setting’s policy “1.20 Handling of Resident Finances and Property” states, “Cornerstone Villa, 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 right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>The assisted living director stated that they don’t manage resident finances except as noted in the policy above. All the residents interviewed had family members who manage their finances. When asked if they have access to their finances for things they want and need, one person said, “I have so far” and another said, “Sure, I definitely get what I need”</p>	<p>Compliant</p>

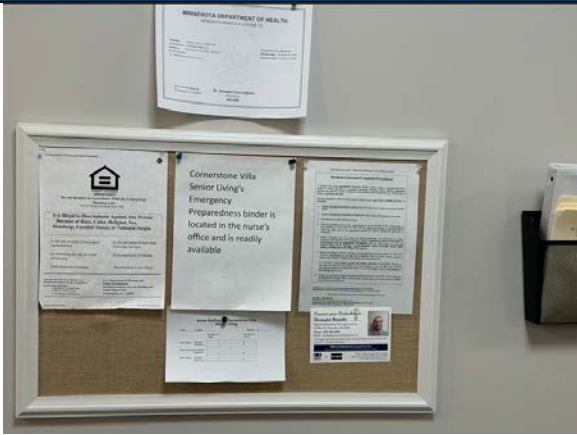
<p>The setting ensures people’s right to privacy.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> Observation during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirements: As required under <a href="#">Minn. Stat. 144G.91</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." "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."</li> <li><input type="checkbox"/> State license requirements: As required under <a href="#">Minn. Stat. 144A.44, subd. 1</a>, "(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;"</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. Staff are trained on this right at orientation and annually thereafter, as well as HIPAA and other privacy practices. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>During staff interviews, staff said they are taught this is especially important. They said they learned that doors should be shut during personal cares and only uncover necessary parts. Staff always knock before entering a resident’s room and protect resident’s privacy by talking about sensitive issues in a private place.</p> <p>Residents interviewed stated that the staff always knock before entering their units. The assisted living director stated during the interview that there are certain cases where the resident wants staff to enter the apartment after</p>	<p>Compliant</p>
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HCBS Rule requirement	Compliance determination
<p>knocking, even if the resident doesn't respond with "Come in". This is something the residents may ask for if they have a hearing impairment or are a heavy sleeper. This is resident directed and must be documented in their care plan. This allows residents to make their own choices about staff entering their homes without accidentally missing services. Observed documentation of resident's request in one of the care plans reviewed.</p> <p>When asked during interviews if staff respected their privacy, one resident responded, "Oh yeah! I don't worry about anything in that area. In fact, one of the staff made a sign to hang on my door when I was having a shower or something so that people would not come in."</p> <p>Observed several staff knocking before entering a person's apartment. Observed staff bend over to get close to a resident so that they could hear what the person needed, while keeping the conversation private. Private information was not observed to be posted anywhere in the facility.</p>	

<p>The setting ensures people’s dignity and respect.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> Observation during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, "Residents have the right to be treated with courtesy and respect, and to have the resident's property treated with respect."</li> <li><input type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144A.44, subd. 1</a>, "(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;"</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. Staff are trained on this right at orientation and annually thereafter. Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>When asked if they are treated with dignity and respect, one resident stated, "Oh yes! They take good care of me. They are so nice and they have lots of patience!" Another resident commented, "They seem to be real good here, especially (named specific staff). She’s a charm!" Residents commented during interviews "Staff make me feel safe" and "They take care of me, and I don’t have to worry about anything."</p> <p>During resident interviews, residents were asked if they knew how to make a complaint if they have one. Residents responded that the information was on a specific bulletin board, and they felt comfortable asking staff for assistance. Assisted living director reported that residents are trained on their right to file a grievance or make a complaint. Every year, residents participate in a scavenger hunt to find the bulletin board with grievance information and contact information for their local Ombudsman.</p>	<p>Compliant</p>
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**HCBS Rule requirement**

**Compliance  
determination**



*Bulletin Board with grievance information*

HCBS Rule requirement	Compliance determination
<p>The setting ensures people’s freedom from coercion and restraint.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input type="checkbox"/> Observation during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.42</a>, “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.”</li> <li><input type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 325F.722, subd. 7</a>, “Residents must be free from any physical or chemical restraints imposed for purposes of discipline or convenience.”</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. Staff are trained on this right, as well as the Vulnerable Adult Act at orientation and annually after Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>Residents interviewed said they never felt like staff were trying to make them do things they did not want to do.</p>	<p>Compliant</p>

<p>The setting optimizes individual initiative, autonomy, and independence in making life choices, including daily schedule and with whom to interact.</p> <p>Validation methods:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Interview(s) with administrative staff.</li> <li><input checked="" type="checkbox"/> Interview(s) with residents.</li> <li><input checked="" type="checkbox"/> Review of setting’s policy and procedure.</li> <li><input checked="" type="checkbox"/> Observation made during on-site visit.</li> <li><input checked="" type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144G.91</a>, “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.”</li> <li><input type="checkbox"/> State license requirement: As required under <a href="#">Minn. Stat. 144A.44, subd. 1</a>, “(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;”</li> <li><input checked="" type="checkbox"/> State statutory requirement: As required under <a href="#">Minn. Stat. 256S.10, subd. 3</a>, “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;”</li> </ul> <p>Narrative:</p> <p>Per the validation methods checked above, it is determined that Cornerstone Villa is compliant with this requirement. Staff are trained on this right at orientation and annually thereafter Residents are given the Assisted Living Bill of Rights, which includes this right, at intake and reviewed with them annually.</p> <p>Cornerstone’s policy “Quality of Life-Resident Self Determination and Participation” states, “Our facility respects and promotes the right of each resident to exercise his or her autonomy regarding what the resident considers to be important facets of his or her own life.</p> <p>During resident interviews, when asked if they get to choose their own schedules, one resident stated “Oh yeah. It’s all up to me what I do. I like to</p>	<p>Compliant</p>
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HCBS Rule requirement

Compliance determination

watch the old time shows like The Waltons”. The resident said they like to have their T.V. loud. Another resident said “Yes, of course I do, it’s my life.”

Observed residents throughout the setting engaged in various activities, both with staff and with people who appeared to be visitors.



*Chairs for residents to socialize*



*Living room area for residents*

# Additional pictures of the HCBS setting



*Kitchen in the common area*



*Laundry room*



*Summer patio area*



*Smaller quiet area for socializing*

# Public comment summary

The Minnesota Department of Human Services (DHS) received public comments for this setting.

DHS sought public comment from 8 a.m. on March 5, 2026, to 4 p.m. on April 4, 2026.

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 [March 4, 2026 E-list announcement](#)
- Notification to providers via email
- Notification to managed care organizations and Area Agencies on Aging (AAA) via eList announcement
- Notification to Office of Ombudsman for Long-Term Care via eList announcement.

We received two public comments for this setting:

- There was one comment in general support of this settings compliance with the HCBS settings rule requirements
- There was one comment in support of this setting’s compliance with “supporting person-centered care, resident choice, social supports and opportunities for meaningful community engagement.”

## Minnesota’s recommendation

<b>Date of recommendation: 4/15/2026</b>
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.