

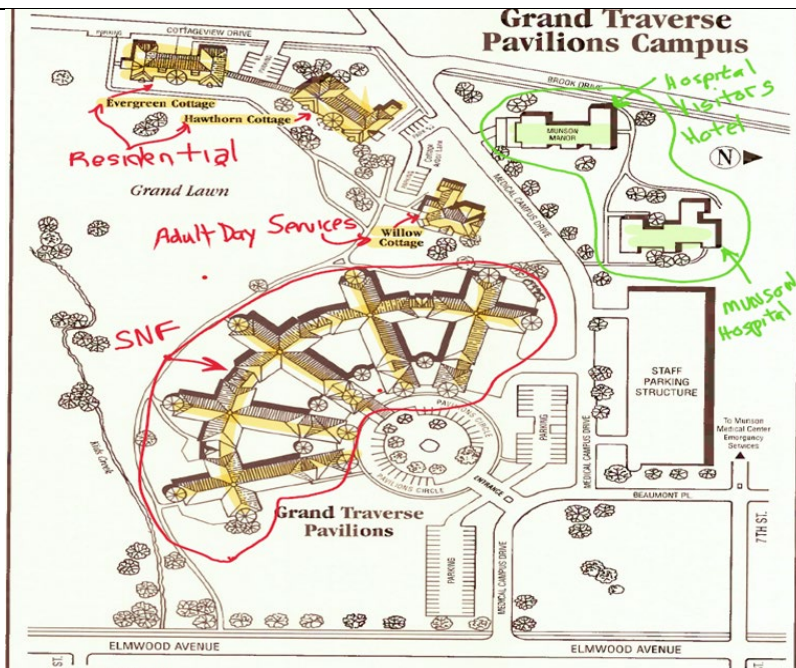
**The State of Michigan**  
**High Scrutiny Evidence packet**

<b>Provider's Name:</b> Grand Traverse Pavilions Adult Day Services Program	
<b>Location of the Setting:</b> Traverse City, Michigan	<b>Type of Setting:</b> Non-Residential
<b>Waiver Services Being Provided at the setting:</b> Adult Day Services	
<b>Heightened Scrutiny Prong</b>	
<input type="checkbox"/> Prong1: Setting is in a publicly or privately operated facility that provides inpatient institutional treatment <input checked="" type="checkbox"/> Prong2: Setting is in a building or on the same grounds of, or adjacent to, a public institution. <input type="checkbox"/> Prong3: setting has an effect of isolating individuals from the broader community	
<b>Recommendation</b>	
As required by 42 CFR 441.301 (c) (5), the State of Michigan submits this request for heightened scrutiny review for the setting identified above. The State has compiled evidence that the setting is integrated and supports full access of individuals to the greater community, is selected by the individual from among disability and non-disability-specific settings, ensures individual rights, and promotes individual initiative, autonomy, choice, and independence.	

## Section 1: Facility description

Grand Traverse Pavilions is owned by the county. The campus consists of a 240 Skilled Nursing facility (Grand Traverse Main Building), a rehabilitation unit located within the Skilled Nursing Facility building (Maple Rehab), an Adult Day Service program, and 3 assisted living buildings known as the "Cottages" consisting of 78 units.

The "Cottage" community consists of 3 separate buildings known as "cottages." The cottage buildings are named Evergreen, Hawthorn, and Willow. Evergreen, Hawthorn, and Willow are not attached to the Skilled Nursing Facility (Grand Traverse Main). The Skilled Nursing Facility located in the Grand Traverse Main Building is a separate building, not attached to any of the other buildings.



Hawthorn is the Independent Living building.

Evergreen and Hawthorn are General Assisted Living. Willow Assisted Living is a Memory Care Unit. The Adult Day Services Program is operated on the 3<sup>rd</sup> floor of the Willow Cottage. Adult Day Services participants may participate in any activities occurring at the other Assisted Living or SNF settings – staff will take them.

The Skilled Nursing Facility in the Grand Traverse main building is licensed, while the Assisted Living Communities and the Adult Day Services Program are not separately licensed.

Also nearby is the Munson Medical Hospital and professional office complex, which includes a hotel for visiting family members of hospitalized patients. These are not affiliated in any way with the Grand Traverse Pavilions but are shown on the facility map since they are a part of the designated "Health Park" area in Traverse City, MI.

### Evidence:

- B3-ALF-ADS-SNF Org Work Chart
- C1-2021 SNF Facility License
- D1-ADS\_3FWillow maps and pictures, D2-Campus Map
- H2-Adult Day Services Program Description



B3 ALF-ADS-SNF C1 2021 SNF D1-ADS 3FWillow D2 Campus Map-GT  
2021 ORG WORK CH-Adjoining Facility Lxmaps and pictures.pPavilions-annotated

## Section 2: Final Rule Compliance and Input from Individuals, Family Members, Guardians, and Staff

This setting accepts residents who accept our Medicaid waiver and people who are not on Medicaid. Residents receiving Medicaid funded HCBS are provided the same opportunities to receive services and supports or participate in social and/or recreational activities in the same manner as individuals who are not receiving Medicaid funded HCBS.

This setting does not only accept residents of the same diagnosis or disability. Some residents at this facility have a diagnosis or disability, such as dementia, Alzheimer's, physical disability, mental disability, or traumatic brain injury, or they may not have a disability or diagnosis.

There are options for using services and supports outside the residence instead of only using the onsite services. Individuals have options within the setting and outside the setting to choose who provides their services and supports. Individuals are able to update or change the services and supports they receive based on their preferences and needs, and they are able to refuse services if they choose. All participants in the Adult Day Service program may freely move about the inside and outside space of the Adult Day Service program. Staff will assist as needed. There is a sign-in/sign-out log at the front desk. The Adult Day Service program is on the 3<sup>rd</sup> floor of the Willow Cottage Assisted Living-memory care area. Adult Day Service program participants are not allowed to go into private rooms in the Assisted Living area per beneficiary interview.

The entrance to the Willow Cottage is gated with a wooden gate and lift latch that does not lock. There is a ramped access to the porch and a flush entrance through the door to the Cottage. There is an elevator to the third floor where the Adult Day Services Program operates. All common areas of the Adult Day Services program facility (bathrooms, kitchenette, calm room, dining, game areas, living room), including entrances, interior hallways, and elevators, are accessible.

Information about filing an anonymous complaint at this setting is in an understandable format and posted in an obvious location. Individuals are also provided with the information on how to discuss any concerns with staff if they choose to discuss concerns with staff.

This setting protects the privacy of individuals' health and personal information by keeping this information locked up. The staff does not discuss individual residents' issues in public spaces.

When addressing individuals, this setting addresses the individual in the manner they prefer.

### Evidence:

- D1-ADS maps and pictures
- I1-Benie ADS Interview AT
- J1 Staff Interview-SMusser
- Direct observation of facility and participants accessing all areas of the Adult Day Services facility, including sitting area, kitchenette, calm room, resting room, arts and crafts table, game table.

This setting does not have restrictions on food. The setting does have scheduled meal times, but participants do not have to eat during those times. Participants are able to eat meals and snacks they want, what they choose to eat, eat with who they want, and are able to eat wherever they want. Meals are prepared and delivered from the

Elevator from day Program



No key Access

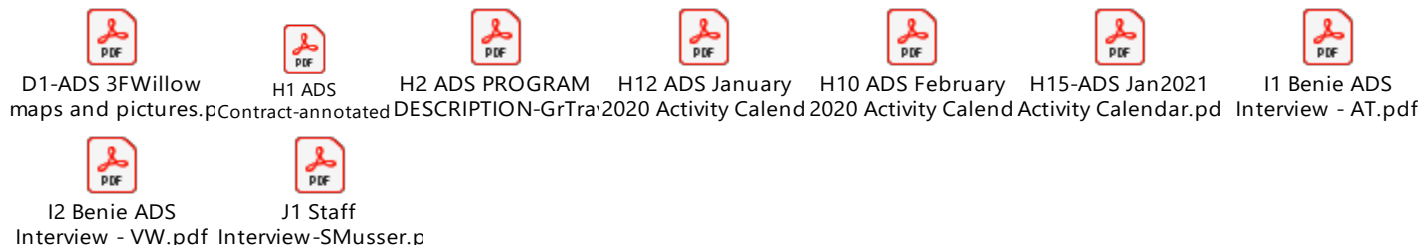


main kitchen, and participants may choose what they want from a menu. All participants in the Adult Day Service program may participate in meals with family or friends; there is a nominal fee for guest meals.



### Evidence:

- H1-ADS Contract, H2-ADS Program Description, H10-ADS Feb 2020 Activity Calendar, H12-ADS Jan 2020 Activity Calendar, H15-ADS Jan2021 Activity Calendar
- I1-Benie ADS Interview AT, I2-Benie ADS Interview VW
- J1 Staff Interview-SMusser



This setting does not prohibit individuals from coming and going from the setting. The setting does not try to limit activities the individuals participate in, such as shopping, religious or spiritual services, scheduling appointments, participating in meals with friends and family, participating in any activities, participating in community events, participating in school or volunteer activities, engaging in legal activity (voting, drinking, gambling, etc) or anything else the participant chooses to participate in. Per staff and Benie interview, participants usually don't schedule to come to the Program on days they have other appointments; however, if they do, they typically rely on rides from family or friends for transportation if the appointment is offsite. Participants may utilize services provided on-site if they choose (PT, OT, speech therapy, whirlpool spa service). Staff can assist with arranging transportation if requested. Most private shopping is done on days when they don't attend the Program; however, if a private errand needs to be done, staff will help arrange transportation.

All participants in the Program may participate in other activities on-site and within the broader community. Other activities may include those being held in the other Assisted Living cottages or the Skilled Nursing Facility setting.

The facility provides a robust activity program that includes visits from local groups, clubs, businesses, and schools to the facility to participate in activities with program participants. Attendees can choose partners for games, dining, social, and recreational activities as they wish, from among other attendees or the staff.

This setting does not control residents' funds. Resident's access and control their own funds.

Residents at this setting have a safe and locked space to store their belongings.

Provider staff receives training and continuing education on individual rights and protections.

This setting, as well as the MI Choice waiver program, prohibits the use of physical restraints and/or restrictive interventions.

This setting will provide assistance to residents who need help with dressing, showering, or other hygiene matters. Participants are able to wear whatever clothing they want and can get assistance with dressing. The setting does ensure privacy for the individual when providing assistance.

This setting does not limit communication devices. Individuals can have and use landlines, cell phones, personal computers, and TV's 24/7 without restriction.

The setting must comply with all aspects of the CMS Final Rule. The person-centered service plan must be developed through an individualized planning process and is driven by the individual. Any modification to the rule must be done on a case-by-case basis and should never apply to all. Any modification must be documented in the person-centered service plan. The HCBS Final Rule states the modification should:

1. Identify a specific and individualized assessed need.
2. Document the positive interventions and supports used prior to any modifications to the person-centered service plan.
3. Document the positive interventions and supports used prior to any modifications to the person-centered service plan.
4. Include a clear description of the condition that is directly proportionate to the specific assessed need.
5. Include regular collection and review of data to measure the ongoing effectiveness of the modification.
6. Include established time limits for periodic reviews to determine if the modification is still necessary or can be terminated.
7. Include the informed consent of the individual or guardian
8. Include an assurance that interventions and supports will cause no harm to the individual.

All modifications would need to be reviewed frequently and the service plan updated to ensure the participant still needs the modifications.

**Evidence:**

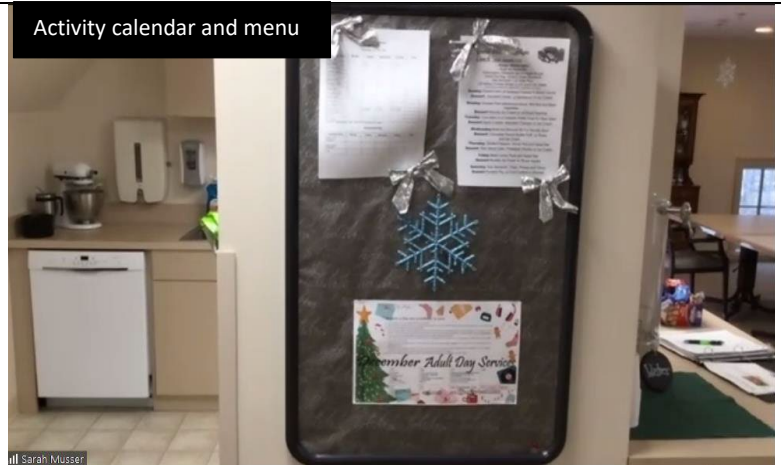
- E1-Life Enrichment Coordinator, E2-Universal Worker job descriptions
- G1-Policy Participant Rights, G4-Policy Code of Conduct (reference to care not based on constituent economics)
- H1-ADS Contract, H2-ADS Program Description,
- I1-Benie ADS Interview AT
- J1 Staff Interview-SMusser



The facility is situated on a larger campus containing shopping venues, restaurants, hospitals, outpatient care/medical offices, a Skilled Nursing Facility, Assisted and Independent Living. Within walking distance from Grand Traverse Pavillions, there are shops, businesses, and restaurants.

**Evidence:**

- D1-ADS Maps and pictures (reference to 11,000 hours of volunteer service publicized on the website)
- D2-Campus Map-GT Pavilions
- G1-Policy Participant Rights, G4-Policy Code of Conduct (reference to care not based on constituent economics)
- H1-ADS Contract, H2-ADS Program Description, H3-ADS Admission Assessment, H7-ADS Application Information, H10 ADS Feb 2020 Activity Calendar, H12-ADS Jan 2020 Activity Calendar, H15-ADS Jan2021 Activity Calendar
- I1-Benie ADS Interview AT, I2-Benie ADS Interview VW
- J1 Staff Interview-SMusser



All participants may seek employment and be employed in the community. If a participant does have a job, family or friends will provide transportation as participants do not usually drive themselves to the Program.

Participants in the Adult Day Service program may participate in educational opportunities within the broader community. Online access is available in the Adult Day Service. If classes were held offsite, and the participant was scheduled to attend on a day enrolled in the Adult Day Care Program, family, friends, or personal vehicle would most likely be used for transportation.

















**Evidence:**

- G1-Policy Participant Rights, G4-Policy Code of Conduct (reference to care not based on constituent economics)
- H2-ADS Program Description
- J1 Staff Interview-SMusser

The use of public transportation is not common among Adult Day Care Program participants. Most make use of facility-sponsored transportation or privately arranged rides from family and friends. If assistance with bus route information is needed, the staff is prepared to provide this as a service to the participant, although, for safety reasons, the facility would check first with the responsible family member before arranging this form of transportation on a day when the participant is at the program site.

**Evidence:**

- D1-ADS\_3FWillow maps and pictures (facility van)
- E2-Universal Worker job description
- I1-Benie ADS Interview AT
- J1 Staff Interview-SMusser
- Direct observation of facility provided transportation busses and vans and public bus stop at the edge of facility campus















						
D1-ADS 3FWillow maps and pictures.p	D2 Campus Map-GT Pavilions-annotated	E1 LIFE ENRICHMENT COORWORKER-JOB DESC	E2 UNIVERSAL POLICY-PARTICIPANT	G1 Conduct-dignity res	G4 POLICYCode of	H1 ADS Contract-annotated
						
H2 ADS PROGRAM DESCRIPTION-GrTra	H3 ADS-RES Admission Assessme	H7 ADS Application Information annota	H10 ADS February 2020 Activity Calend	H12 ADS January 2020 Activity Calend	H15-ADS Jan2021 Activity Calendar.pd	I1 Benie ADS Interview - AT.pdf
						
I2 Benie ADS Interview - VW.pdf	J1 Staff Interview-SMusser.p					

Policies related to individual rights and other Adult Day Care Program expectations and provisions are provided to participants and reviewed verbally. This setting provides all residents with their policies, which outline individual rights, protections, and expectations of services and supports in an understandable format. Staff reviews these with the participant at the time the contract is signed and will answer questions then or as they arise thereafter. The participant signs an acknowledgment of receipt of the privacy and the Abuse/Neglect prevention policies. Staff receive training via RELIAS training modules upon hire and annually thereafter. Modules include Abuse/Neglect prevention, HIPAA/Confidentiality, Participant/Resident Rights, Person-Centered Care, and Cultural Competence.

The use of seclusion and physical or chemical restraints is prohibited in all areas of the Grand Traverse Pavilion, including the Adult Day Services program, Assisted Living, and SNF units.

#### Evidence:

- F1-F5 Staff Training Logs, F6-Relias Training Schedule 2021
- G1-Policy Participant Rights, G2-Policy ADS Participant Complaint Process, G3- Prohibiting and Prevention of Abuse,
- H1-ADS Contract, H6, Acknowledgement of Reporting Abuse or Neglect, H7-ADS Application Information, H9, Acknowledgement of Privacy Practices
- J1 Staff Interview-SMusser

						
F1 TRAINING-SM-anno	F2 TRAINING-SM2-ann	F3 TRAINING-AR-annot	F4 TRAINING-KC-annot	F5 TRAINING-NJ-annot	F6 RELIAS TRAINING SCHEDULE 2021-GT	G1 POLICY-PARTICIPANT
						
G2 POLICY ADS Participant Complai	G3 POLICY Abuse Prohibition and Prev	H1 ADS Contract-annotated	H6 ADS-Acknowledgem	H7 ADS Application Information annota	H9 ADS Acknowledgment Pr	J1 Staff Interview-SMusser.p

### Section 3: Additional Evidence

Entrance to Willow Cottage/entrance to Adult Day Program:

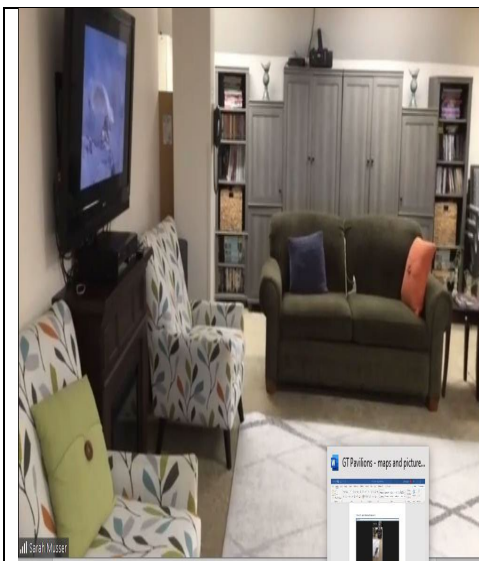


Outdoor pathway



Living area





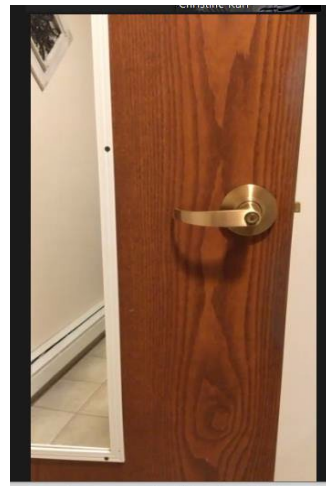
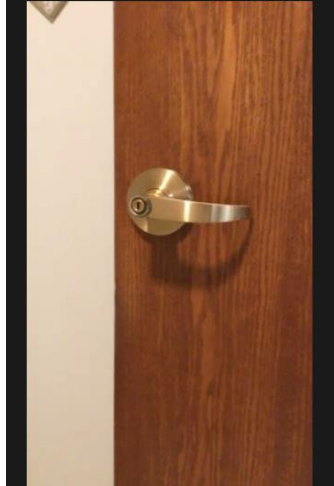
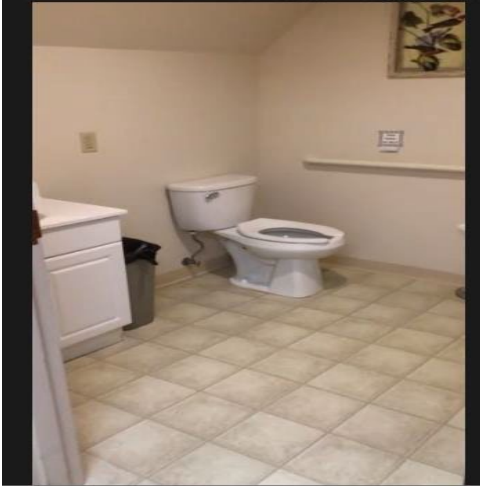
Quiet seating area

Confort pet- ADP/ Willow( follow Eden alternative)



Accessible public Bathroom

Lockable doorknob on bathroom



Individual cubbies to store personal items, locked storage in director office

Kitchen area



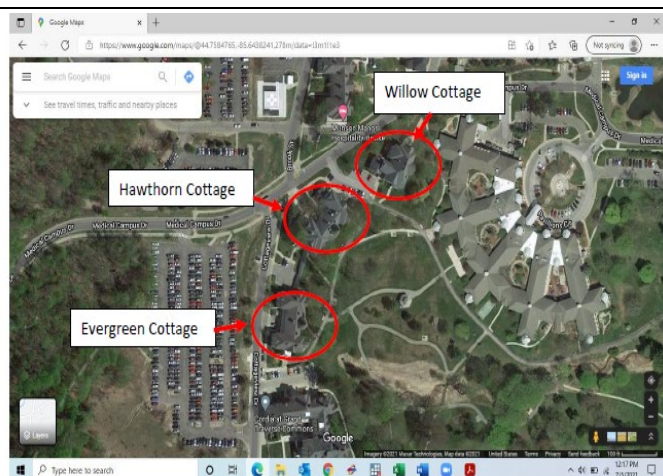
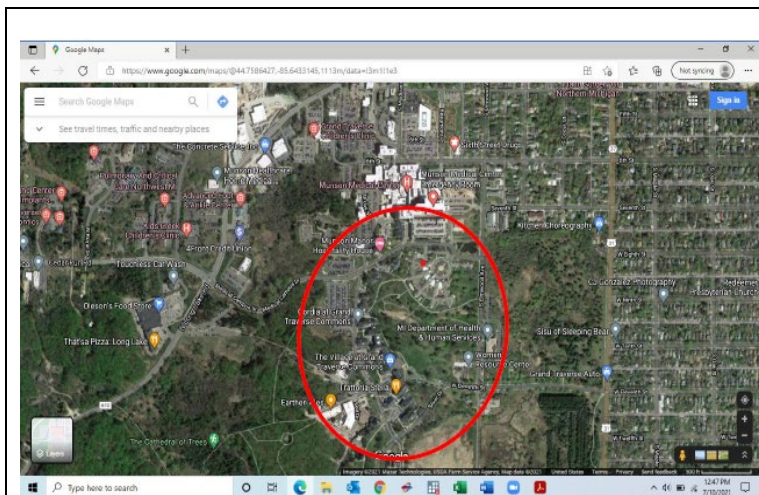
Grand Traverse Pavilions – webpage information. GT Pavilions is the parent organization for a 240 bed SNF (GT Main Building) which also offers Rehab Unit (Maple Rehab) and an Assisted Living Community known as the "Cottages" with 78 apartments. There are 3 Cottage communities – Evergreen, Hawthorn, and Willow. Evergreen and Hawthorn are General Assisted Living, while Willow Assisted Living is a Memory Care area. The Adult Day Program also operates on the 3<sup>rd</sup> floor of the Willow Cottage. There is also a new area for Independent Living in Hawthorn Lofts (new construction).

[Home | Grand Traverse Pavilions \(gtpavilions.org\)](http://gtpavilions.org)

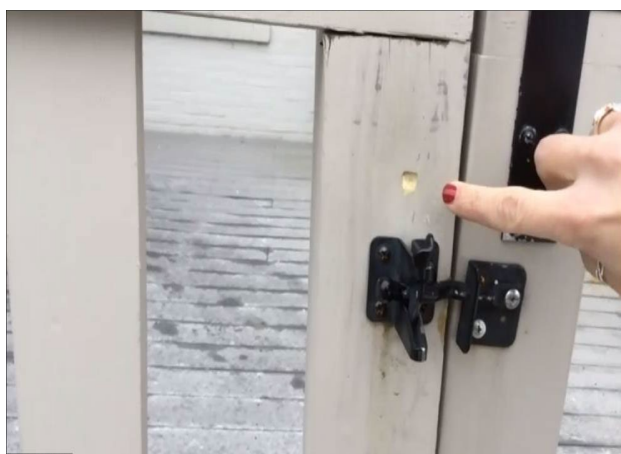
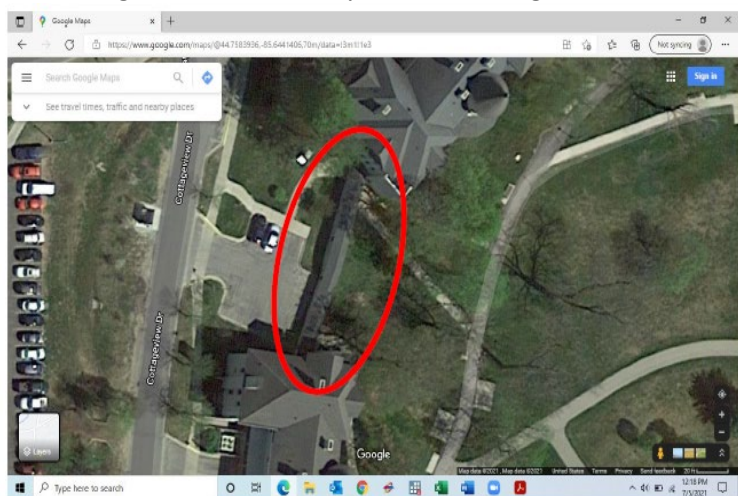
There is a dedicated Director over Assisted Living/Day Program separate from SNF operations

Grand Traverse Pavilions complex

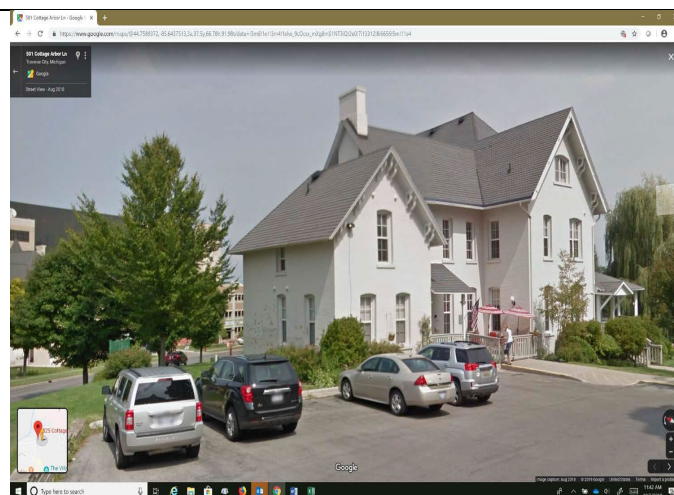
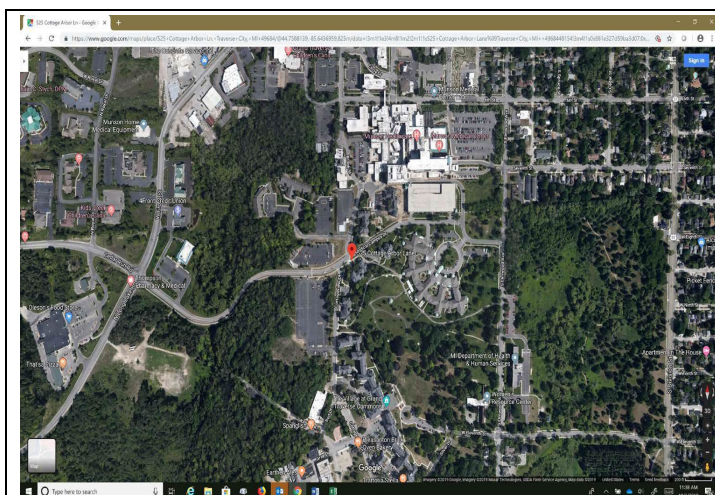




## Connecting Enclosed Walkway between Evergreen and Hawthorn Cottages



**Grand Traverse Pavilions – Willow Cottage, 525 Cottage Arbor Lane, Traverse City, MI 49684**



## Section 4: Public Comment

