

The State of Michigan
High Scrutiny Evidence packet

Provider's Name: Grand Traverse Pavilions-Hawthorne & Evergreen Assisted Living	
Location of the Setting: Traverse City, Michigan	Type of Setting: Residential
Waiver Services Being Provided at the setting: Assisted Living	
Heightened Scrutiny Prong	
<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	
Recommendation	
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

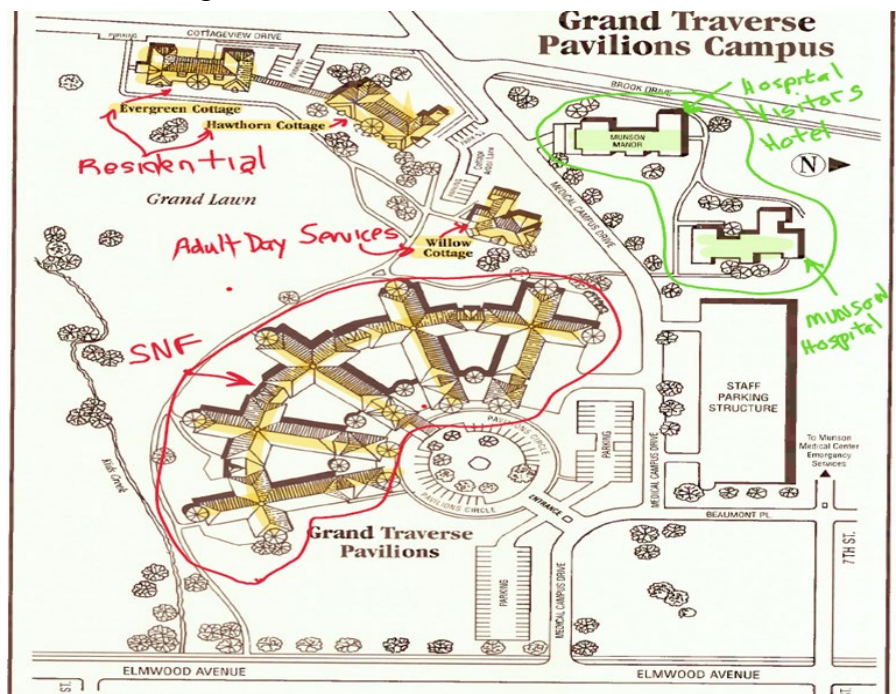
Grand Traverse Pavilions is owned by the county. The campus consists of a 240 Skilled Nursing facility (Grand Traverse Main Building), a rehabilitation unit located within the Skilled Nursing Facility building (Maple Rehab), an Adult Day Service program, and 3 assisted living buildings known as the "Cottages"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

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.

The units in Evergreen and Hawthorn include studio and 1 BR units having private kitchenette areas including microwave and refrigerator within the private unit. Units may be shared if mutually agreeable to both parties.



Evergreen and Hawthorn are General Assisted Living. Willow Assisted Living is a Memory Care Unit. The Adult Day Services Program is operated on the 3rd 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-ALF maps and pictures, D2-Campus Map
- B-ALF-ADS 2021 Org Work Chart, B2-Nov 2018 Board Minutes, B3-Oct 2018 Board Minutes
- C1-2021 SNF License
- D1-ALF maps and pictures, D2-Campus Map
- H1-ALF Contract, H6-ALF Residential Services Info Packet
- J1 Staff Interview – Smack



B1 ALF-ADS-SNF
2021 ORG WORK CHBOARD



B2 NOV 2018
MTG MINUT



B3 OCTOBER 2018
BOARD MTG MINUT



C1 2021 SNF
Adjoining Facility Lic



D1- ALF maps and
pictures.pdf



D2 Campus Map-GT
Pavilions-annotated



H1 ALF
Contract-Agreement



H6 ALF Residential
Services Information



J1 Staff
Interview-SMack.pdf

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

This setting accepts residents who except 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.

This setting does not prohibit individuals from coming and going from the setting. The Cottages are open 24/7; however, the doors to all the Cottages are always locked with keypad access. Residents have the passcode, or there is a doorbell they can ring, and staff will let them in. There is a sign-in/out log at the reception desk. 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. Residents participate in volunteering activities and assist with planting flowers in local parks and at information booths for local festivals.



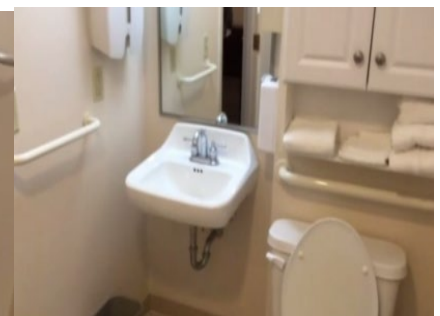
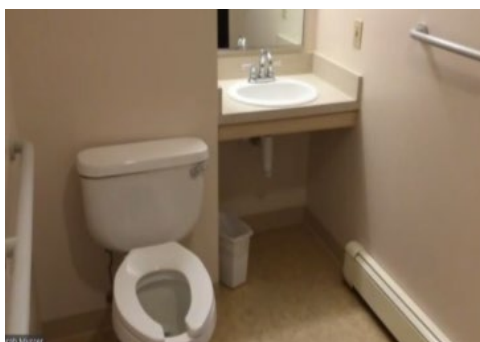
This setting does not have visiting hours. Participants can come and go 24/7. Participants at this setting are able to come into the setting at all hours. Participants can have visitors 24/7. Individuals arrange and control their personal schedules of daily appointments and activities.

There are no restrictions on the use of the outside spaces at the facility for Assisted Living residents.

This setting does not restrict common areas. Common areas are not locked within the facility, and individuals have full access to all common areas. Access to the building and within the facility is barrier-free (wheelchair ramp) and accessible.

Evidence:

- D1-ALF maps and pictures
- H1- ALF Contract, H6-ALF Residential Services Info packet
- I1-ALF Benie Interview-MV
- J1 Staff Interview-Smack



Environmental adaptations are present in all public and private units in the facility. Adaptive accommodations are made before move-in based on the resident's assessed needs. These include but are not limited to grab bars, raised toilet seats, shower chairs, handrails in hallways, wide doorways, and hallways. Entrances and transitions are barrier-free.

Evidence:

- D1-ALF maps and pictures
- H6-ALF Residential Services Info packet
- J1 Staff Interview-Smack
- D1-ALF maps and pictures
- G4-Policy Code of Conduct
- I1 ALF Benie Interview-MV
- J1 Staff Interview-Smack



D1- ALF maps and pictures.pdf



G4 POLICY Code of Conduct-dignity res



H1 ALF



H6 ALF Residential Services Information



I1 ALF Benie



Interview - MV.pdf Interview-SMack.pdf

A robust activity calendar is posted online and delivered to the residents each month. Activities are conducted at all facilities, but residents may join at either facility depending on their preference. The Activity Director is open to suggestions and tries to incorporate ideas of interest to the residents. The facility sponsored several outings within the broader community, including Christmas Tree Lights viewing, local festivals, restaurants, and picnics. Residents participate in private shopping within the nearby retail marketplace that is within walking distance, or staff will assist in arranging transportation if the resident does not have a personal vehicle.



Evidence:

- G3-Resident Rights Handout, G4-Policy Code of Conduct
- H6-ALF Residential Services Info Packet, H15-General ALF Jan2021 newsletter, H16-Willow ALF Jan 2020 Newsletter, H18-ALF Jan 2021 Activity Calendar
- I1 ALF Benie Interview-MV
- J1 Staff Interview-Smack

Residents arrange and control their own personal schedules as they choose. Staff will encourage them to choose activities according to their interests, but they do not coerce the resident into participating. They may utilize facility-provided services or service providers within the broader community.

Evidence:

- E1-Life Enrichment Coordinator, E2-Universal Worker, E3-Residential Services Director job descriptions
- F1-F5 Staff Training Logs (resident rights, PCC), F6-Relias Training Schedule 2021
- G4-Policy Code of Conduct
- H6-ALF Residential Services Info Packet
- I1 ALF Benie Interview-MV, I2 ALF Benie Interview-DM
- J1 Staff Interview-Smack

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 whom they want, and are able to eat wherever they want. Those residents who choose to have a meal plan as part of their contracts may participate in meals with family and friends. If family and friends are joining the resident, they can arrange a private table in the dining room or a separate private room or have the meals served in their unit. Menus are available each month, and residents choose from a variety of entrees and other accompaniments.



Evidence:

- G3-Resident Rights Handout, G4-Policy Code of Conduct
- H2-ALF Meal Plan Agreement, H6-ALF Residential Services Info Packet, H9-ALF Menus, H10-Personal Services Fees,

- I1 ALF Benie Interview-MV, I2-ALF Benie Interview-DM
- J1 Staff Interview-Smack

Individual units have kitchenettes with a refrigerator and microwave. The common area has a kitchenette, snack room, and dining area open for meals 7 AM – 9 PM, or meals can be delivered to the room. Residents have free access to the common kitchenette 24/7 located in the dining area, which is stocked with snack items. Residents may take food back to their rooms or consume it where they choose.



Evidence:

- D1-ALF maps and pictures
- H2-ALF Meal Plan Agreement, H6-ALF Residential Services Info Packet, H10 Personal Services Fees
- I1-ALF Benie Interview-MV, I2-ALF Benie Interview-DM
- J1 Staff Interview-Smack



The facility vans have a wheelchair accessible (lift), and the facility also owns a bus to take people to appointments and activities off-site. Vans are used for medical provider appointments in the community within a 20-mile radius. The bus is used for outings. Both vehicles are handicap accessible. Residents also use family/friends, public bus lines, Uber, and private taxis. Staff assists with scheduling rides as needed if asked to do so.

In addition to facility-provided transportation, there is a public bus stop within walking distance of the Cottages. Staff will assist residents with bus schedules and access to the bus stop if walking is difficult for the resident.

Evidence:

- D1-ALF maps and pictures
- E1-Life Enrichment Coordinator, E2-Universal Worker job descriptions
- H1-ALF Contract, H6-ALF Residential Services Info packet, H10-Personal Services Fees
- I1-ALF Benie Interview-MV
- J1 Staff Interview-Smack



All participants have locks on the entry door to their room and have the keys. Only necessary staff have the keys to participants' rooms. All shared, or public restrooms are equipped with locks. Staff members are respectful of entering participants' private rooms. They do not enter without permission of the participant or notifying them if they need to enter. Before entering the participant's private room, staff knocks; if there is no answer, staff knock again. If there is still no answer, staff will open the door, call out for the participant, and let them know they are there. If there is still no answer, staff will enter the participant's private room to conduct a welfare check.

If the participant has a shared room, the participant has a choice of roommate.

Participants have the freedom to furnish or decorate their rooms.

Evidence:

- D1-ALF maps and pictures
- H6-ALF Residential Services Info packet
- I1-ALF Benie Interview-MV, I2-ALF Benie Interview-DM
- J1 Staff Interview-SMack

All units are prepared for Wi-Fi, Television, and landline telephone services. Personal cell phones, computers, and tablets may be used privately in private sitting areas and activity areas whenever and wherever the resident chooses. The facility has a few tablets that may be reserved and signed out for use. Telephone and internet access are supplemental services available for a fee.

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:

This setting provides all residents with their policies, which outline individual rights, protections, and expectations of services and supports in an understandable format.

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.

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

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.

Residents at this setting have leases or residential agreements offering eviction protections and information on appealing evictions.

This setting provides all residents with their policies, which outline individual rights, protections, and expectations of services and supports in an understandable format.

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.

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.

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:

- D1-ALF maps and pictures
 - H6-ALF Residential Services Info packet, H10-Personal Services Fees
 - I1-ALF Benie Interview-MV
 - J1 Staff Interview-Smack
- Seclusion, physical, and chemical restraints are forbidden in the facility. Staff receives training on individual rights, person-centered care planning, mandatory reporting of suspected abuse/neglect upon hire, and annually thereafter.

Evidence:

- F1-F5, Relias Staff Training Logs, F6-Relias Training Schedule 2021
 - G1, POLICY, Abuse Prohibition and Prevention, G3-Resident Rights Handout,
 - J1 Staff Interview-Smack
- | | | | | | | |
|---|---|---|---|--|---|---|
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| D1- ALF maps and pictures.pdf | 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-GTF |
|  |  |  |  |  |  |  |
| G1 POLICY Abuse Prohibition and Prev | G3-Resident Rights Handout.pdf | H6 ALF Residential Services Information | H10 Personal Services Fees.pdf | I1 ALF Benie Interview - MV.pdf | I2 ALF Benie Interview - DM.pdf | J1 Staff Interview-SMack.pdf |

Section 3: Additional Evidence



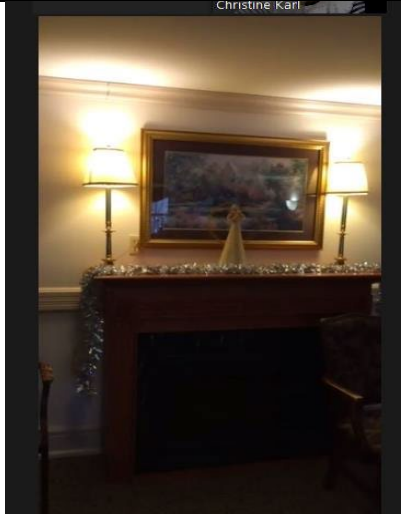
Tunnel between **Hawthorn and Evergreen Assisted Living Cottages**, no barrier or gating to access, allows residents to participate in activities at either setting



Common areas

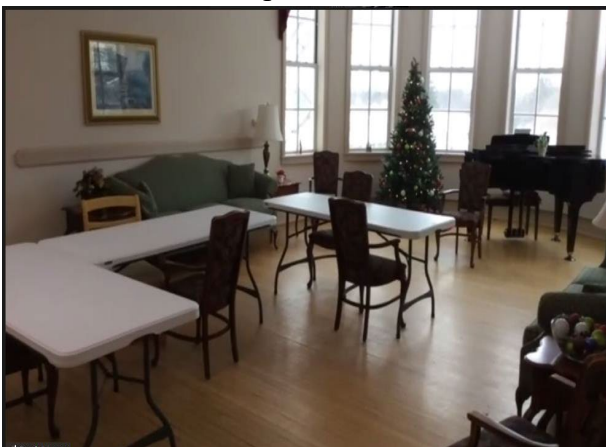
Outdoor pathway





Dining area

Area available for a private function



Elevator access

Private Mailboxes

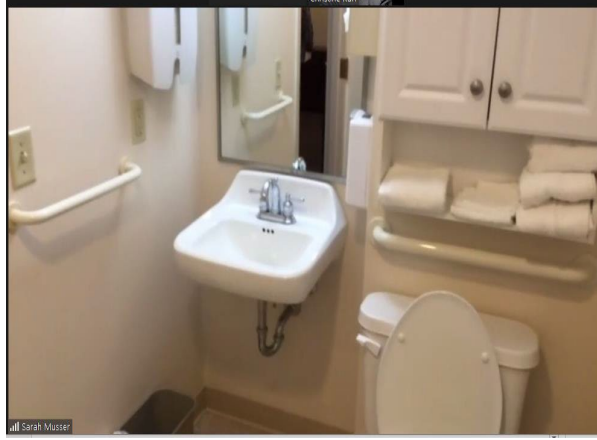


Willow unit – ***Memory Care Unit*** residents, no common areas with kitchenette appliances due to memory care, could have mini-fridge if cognitively intact, units have private bathrooms but no private bathtub/shower – use spa area, all doors kept locked, and residents don't have own keys



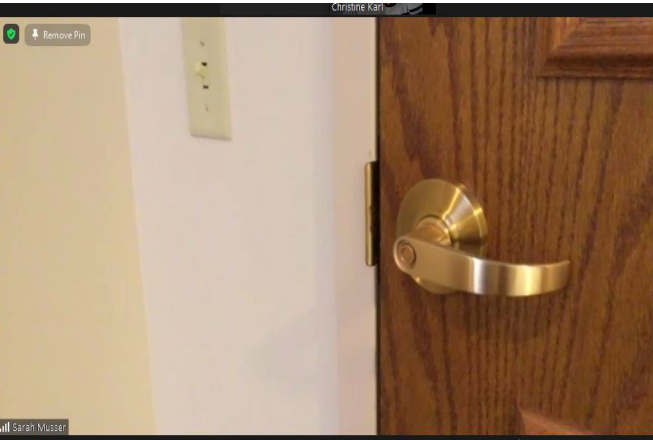
Sarah Musser

Private Bathroom



Bathroom doorknob

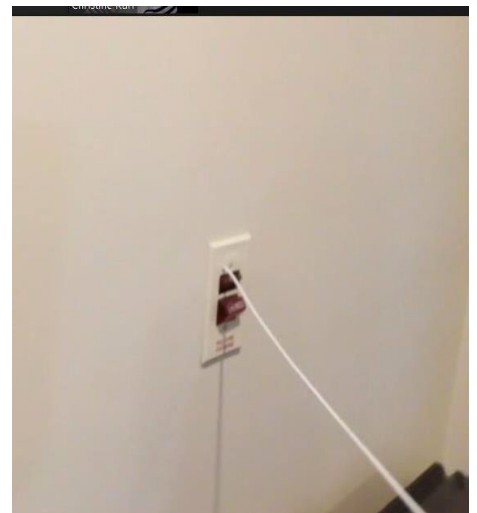
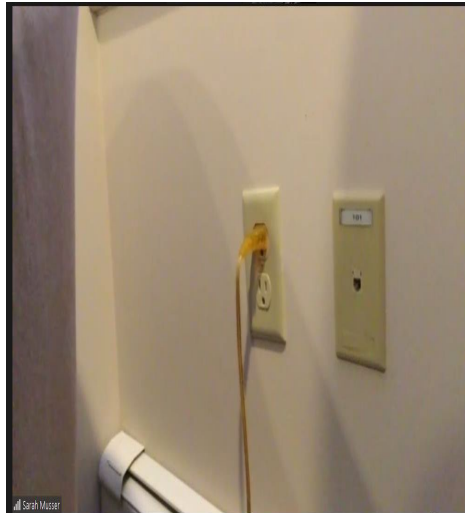
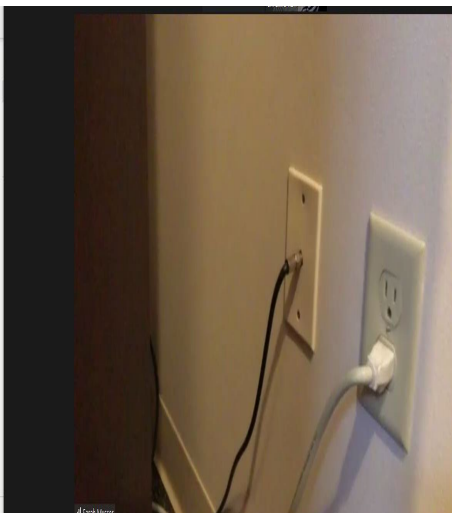
Going into apartment



Cable hookup

Phone hookup

Pullcord for safety next to bed and in bathroom



Inside spa room



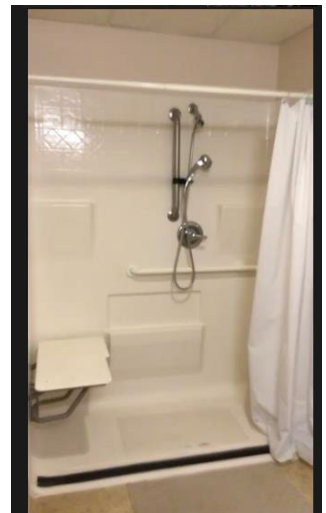
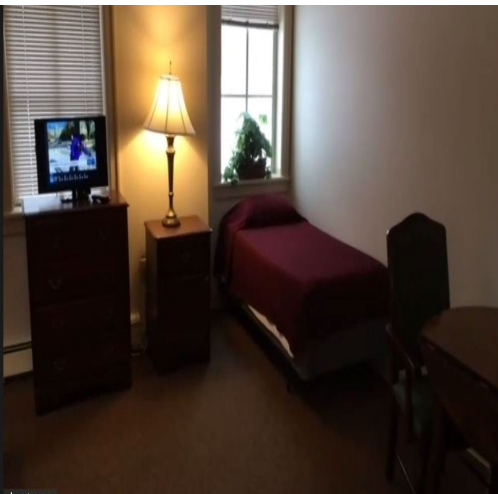
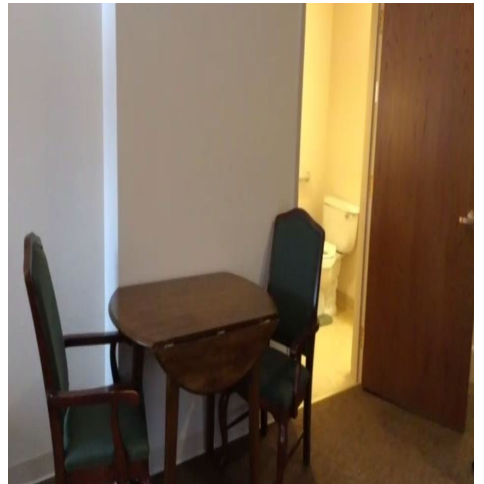
Photo from inside door. In case of fire – all doors automatically unlock

Facility Van



Private Unit

Private Kitchinette



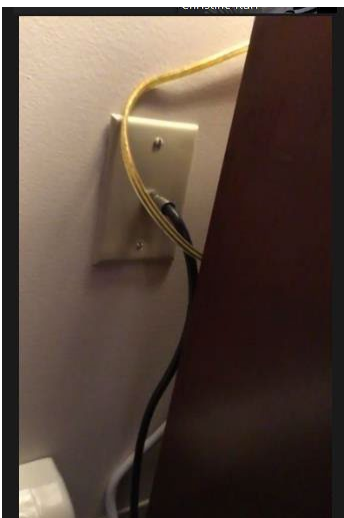
Doorknob with lock-in private unite



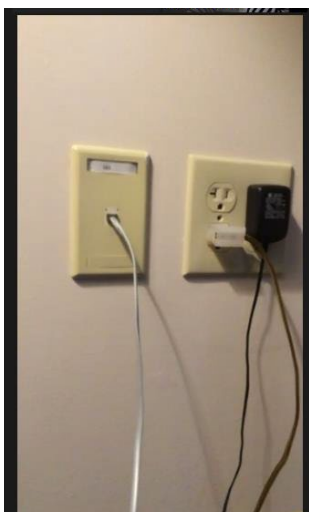
Door into the bathroom from Private unit



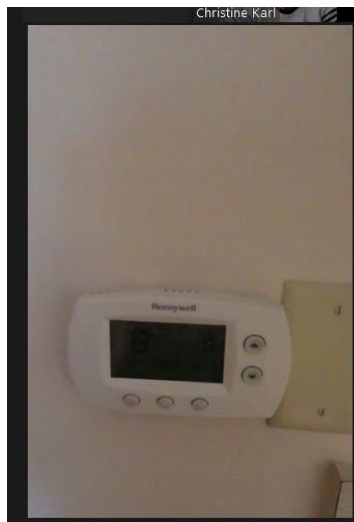
Cable Hookup



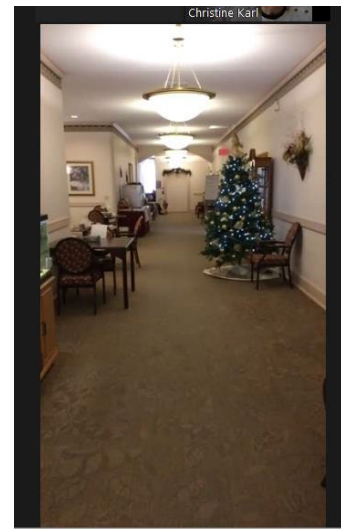
Phone



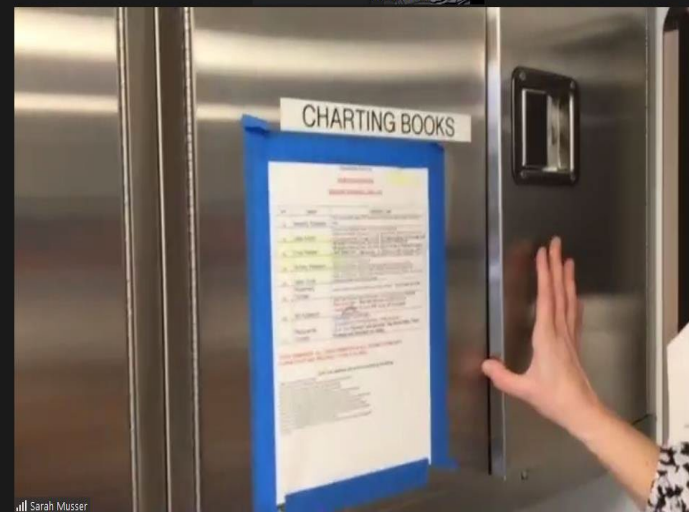
Control own heat/air



Hallway



Notebooks for Staff



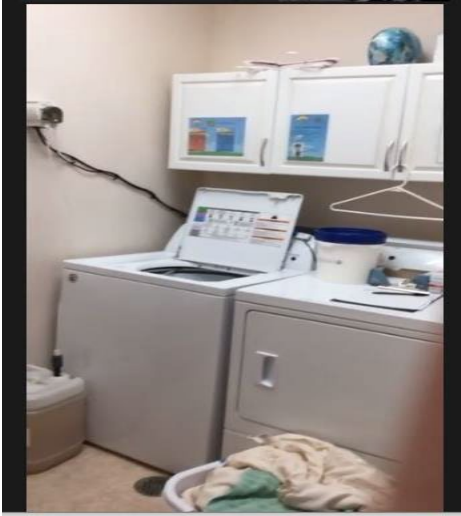
Locked door to commercial kitchen, charting kept here and not open to residents:

Additional beverage / Snack Station

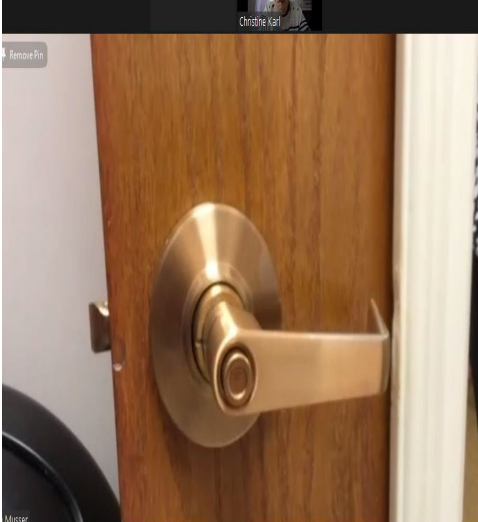
Suggestion box

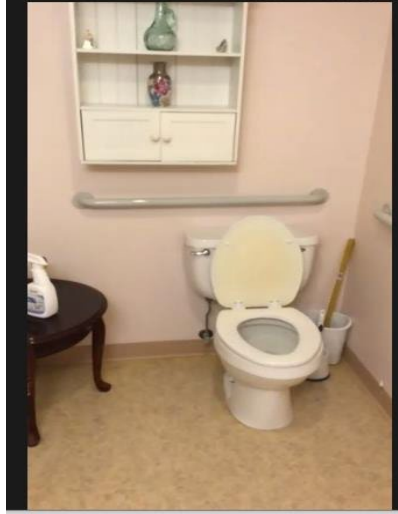
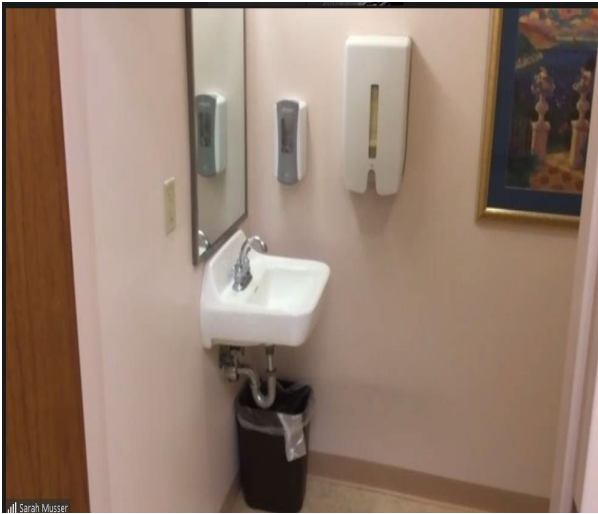


Laundry area, no door, accessible 24/7



Public Bathroom





Picture of skilled nursing facility in distance – different building on the same campus. Accessible walkways throughout campus



Storage , not locked

Individual storage bins, individual can lock

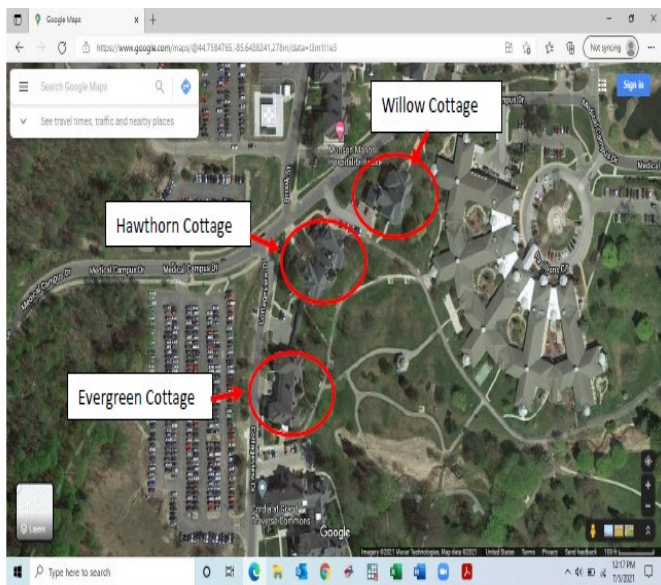


Grand Traverse Pavilions – webpage information. GT Pavilions is the parent organization for a 240 bed SNF (GT Main Building) which also offers Rehab Unit (Maple Rehab) and an Assisted Living Community known as the "Cottages" with 78 apartments. There are 3 Cottage communities – Evergreen, Hawthorn, and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

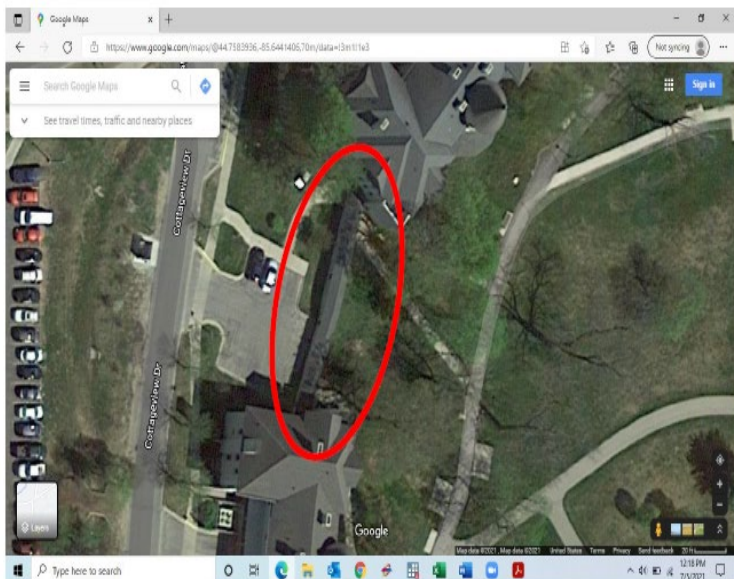
[Home | Grand Traverse Pavilions \(gtpavilions.org\)](https://gtpavilions.org)

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



Section 4: Public Comment

