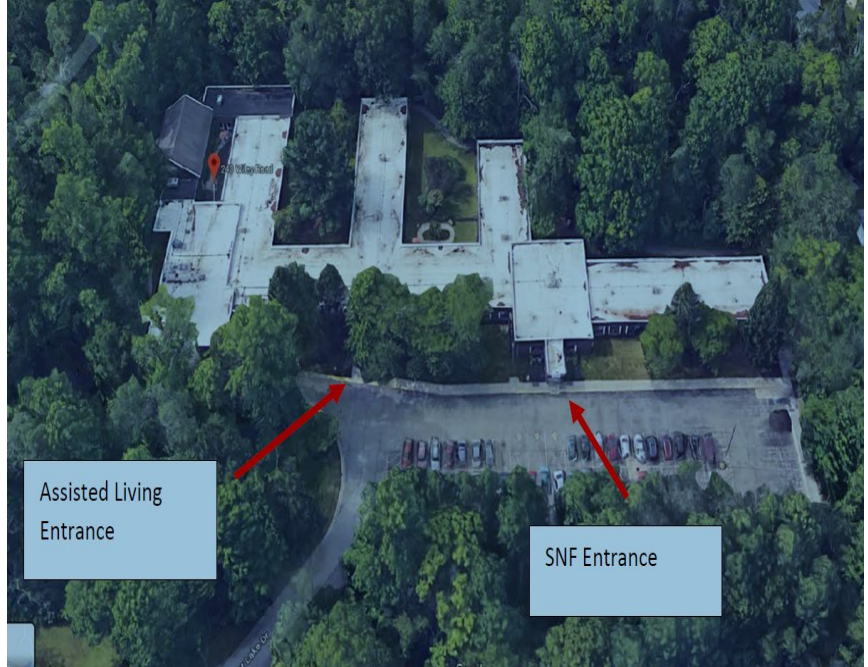


The State of Michigan
High Scrutiny Evidence packet

Provider's Name: Harbors Grace of Douglas	
Location of the Setting: Douglas, Michigan	Type of Setting: Residential Setting
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	
<p>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.</p>	

Section 1: Facility Description

Harbors Grace of Douglas is privately owned and operated. There is a Skilled Nursing Facility (SNF) and Assisted Living Facility located in the same building, each having a separate entrance. You enter the building through one shared entrance. Once you enter the building, there are three separate hallways. The assisted living is located at one end of the main corridor and in a separate wing from the main hallway. The skilled nursing facility is in another wing. The assisted living has 28 assisted living rooms.



The Skilled Nursing Facility and assisted living facility have separate staff.

However, their kitchen, housekeeping, and maintenance staff are shared. In emergencies, some aids/assistance may pick up per diem work in the assisted living, but this is only in the event they need to cover for staffing issues. Orientation training includes material on the differences between skilled residents and ALF residents.

Evidence:

- A1-2021 AL License, A3-License Extension Screenshot
- B2-Governance/Org Chart
- C1-2021 SNF License
- D1-Maps and pictures, D2-Facility Map
- D1-Maps and pictures, D2-Facility Map



A1-2021 AL Site
licence-Douglas Cov



A3-LicenseExtensio
n screenshot.pdf



B2-GOVERNANCE-O
rg Chart-Harbor He



C1-2021 SNF
License-Grace of Do



D1_maps and
pictures.pdf



D2 FACILITY MAP -
annotated.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 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 is a log-in and out book for visitors and residents on each floor. A family member stated they could take their mother out any time of the day. Residents are free to move about the outside campus 24/7; staff will assist those for whom this will be unsafe. The procedure for entering a resident's apartment is to knock, wait for a response, knock again, and wait for a response. If none, enter and announce who you are and why you have entered the room.

There is no restriction on individuals' and guests' ability to come and go from the setting. There are no restrictions in the common areas. Doors in the common hallway having both SNF and ALF units are unlocked, and ALF residents can enter that space to use the common areas there. Facility restricted areas include the laundry room, commercial kitchen, staff access hallway, and maintenance room. Doors in the common hallway having both skilled nursing facility and assisted living units are unlocked and assisted living residents can enter that space to use the common areas there.

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.

Evidence:

- D1, maps, and photos
- I1-Benie PM, I2-Benie GB interviews

- J1-Staff DThomson, J2-Staff KWerK, J3-Staff WWhite interviews

Residents are free to move about without restrictions on the facility's outdoor campus, which is set in a heavily wooded area. The entrance to the assisted living area is managed with a keypad, and residents are provided the code. There are two courtyards – one is within the footprint of assisted living buildings. The door to this area does not lock.

The facility is barrier-free; entrances, hallways, and room transitions. There are environmental adaptations, grab bars, shower chairs, commodes, raised toilet seats, and personal appliances at an appropriate height to use safely.

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.

Evidence:

- D1, maps, and photos
- J1-Staff DThomson, J2-Staff KWerK, J3-Staff WWhite interviews
- D1, maps, and photos
- I1-Benie PM, I2-Benie GB interviews
- J1-Staff DThomson, J2-Staff KWerK, J3-Staff WWhite interviews
- H2-New Resident Info Packet (Exhibit E-Bill of rights, p.20 House Rules/Guidelines)
- I1-Benie PM, I2-Benie GB interviews
- J1-Staff DThomson, J2-Staff KWerK, J3-Staff WWhite interviews

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. All residents are free to participate in meals with family and friends. Nominal fee for guest meal passes, and advance notice requested. Food is available 24/7 in a common kitchenette which is stocked with sandwiches, snacks, and beverages. Residents may also provide a refrigerator in their unit. Residents can eat in the dining room or their unit if they prefer. Meal service includes a choice of menu items and a la carte options.

The dining area is open and accessible to residents 24/7. There are specific hours when meal service is available, and this is posted along with the menu each day and month. Dining room furniture can accommodate mobility devices.

Evidence:

- H2-New Resident Info Packet (Exhibit B-Admission Policy, Exhibit E-Bill of rights, p.20 House Rules/Guidelines)
- D1-Maps and pictures
- H2- New Resident Info Packet (p.21-Exhibit I Community House Rules/Guidelines)
- I1-Benie PM, I2-Benie GB interviews
- J1-Staff DThomson, J2-Staff K Werk, J3-Staff WWhite interviews



D1_maps and pictures.pdf



H2-New Resident Info packet-DOUGL



I1-Benie_PM.pdf



I2 Benie_GB.pdf



J1 Staff-DThomson.pdf



J2 Staff -K Werk.pdf



J3 Staff -WWhite.pdf

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 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.

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 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 and call out for the participant and let them know they are there. If there is still no answer, staff will enter the participants' 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.

Participants have access to transportation.

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.

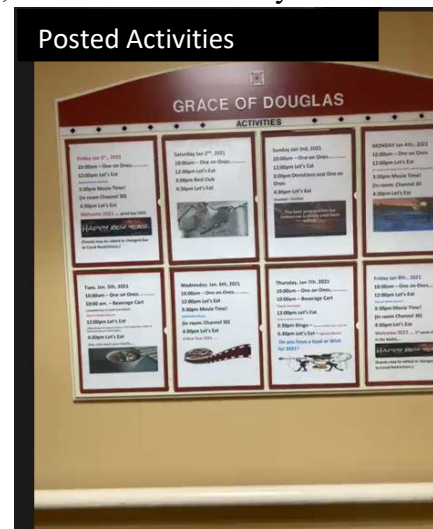
All modifications would need to be reviewed frequently and the service plan updated to ensure the participant still needs the modifications.

Evidence:

- D1-Maps and pictures (screenshot of amenities)
- E2-Assisted Living Med Tech position description
- H2-New Resident Info Packet (Exhibit E Resident Rights, Exhibit I Community House Rules/Guidelines)
- I1-Benie PM, I2-Benie GB interviews
- J1-Staff DThomson, J2-Staff K Werk, J3-Staff WWhite interviews
- Reviewer's direct observation of MiChoice residents choosing to do a different activity other than participating in the group activity being conducted

Evidence:

- H2-New Resident Info Packet (Exhibit B-Admission Policy, Exhibit E-Bill of rights, p.20 House Rules/Guidelines)
- I1-Benie PM, I2-Benie GB interviews
- J1-Staff DThomson, J2-Staff K Werk, J3-Staff WWhite interviews



The facility has a wheelchair-accessible bus used for outings and transportation to and from personal appointments. Public transportation is also available, and staff will assist with making these arrangements. Family and friends may also transport residents. Some residents have a personal vehicle and drive themselves.

Public bus and taxi services are available. Staff will assist with making public transportation arrangements and with using transit.

Evidence:

- H2-New Resident Info Packet (Service Needs Determination)
- I1-Benie PM, I2-Benie GB interviews
- J1-Staff DThomson, J2-Staff K Werk, J3-Staff WWhite interviews



D1_maps and pictures.pdf



E2 AL MED TECH PD.pdf



H2-New Resident Info packet-DOUGL



I1-Benie_PM.pdf



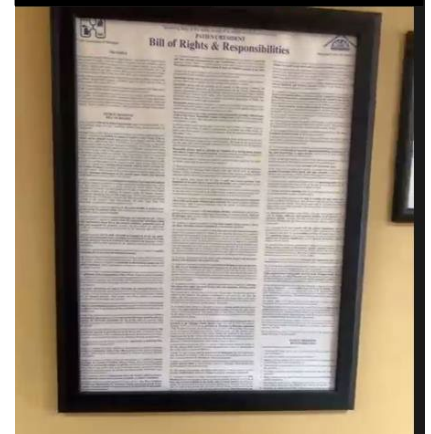
I2 Benie_GB.pdf

Evidence:

- D1-Maps and pictures
- F1-F6-Employee Training Logs (person-centered care)
- G2-Policy-Answering Call Light (address resident/enter room)
- I1-Benie PM, I2-Benie GB interviews
- I2-Benie GB interviews
- J1-Staff DThomson, J2-Staff K Werk, J3-Staff WWhite interviews

Staff receive training on resident rights during new hire orientation and annually thereafter. The facility utilizes the RELIAS platform to deliver staff education. The use of physical or chemical restraints or seclusion is not allowed in this facility per staff interview. Resident informational materials provide an excerpt from Michigan's public health code specifying the conditions under which restraints/seclusion may be used, but this is not allowed in the facility per staff interview.

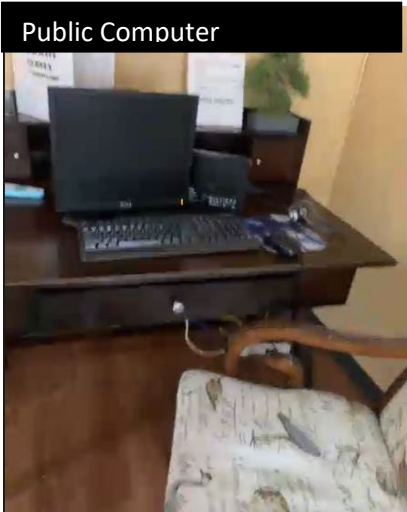
Posting of Right & Responsibility



Evidence:















- H2-New Resident Info Packet (Resident Rights)
- F1-F6 Employee Training Records on Resident Rights
- J1-Staff DThomson, J2-Staff KWerk, J3-Staff WWhite interviews

Residents may have access to and use personal communication devices without restriction and in private if they wish. Some units have landline access, and all areas of the facility have wi-fi access. If residents are in a unit without a landline and want to have one, maintenance will install it for them. The facility also provides a shared computer with an internet connection for residents' use.



Evidence:

- D1-Maps and pictures
- H2- New Resident Info Packet (p. 12 Exhibit E-Resident Rights, p.21-Exhibit I Community House Rules/Guidelines)
- I1-Benie PM, I2-Benie GB interviews
- J1-Staff DThomson, J2-Staff KWerk, J3-Staff WWhite interviews

						
D1_maps and pictures.pdf	F1 TRAINING - GP - annotated.pdf	F2 TRAINING - AR - annotated.pdf	F3 - TRAINING - AT - annotated.pdf	F4 - TRAINING - DTT - annotated.pdf	F5 - TRAINING - HK - annotated.pdf	F6 - TRAINING - KM - annotated.pdf
						
G2-POLICY-address resident-enter roomInfo packet-DOUGL	H2-New Resident Info packet-DOUGL	I1-Benie_PM.pdf	I2 Benie_GB.pdf	J1 Staff-DThomson.pdf	J2 Staff -KWerk.pdf	J3 Staff -WWhite.pdf

Section 3: Additional Evidence

Entrance to facility, Residents, and families have code



Door between SNF & AL



Doorbell to staff's desk

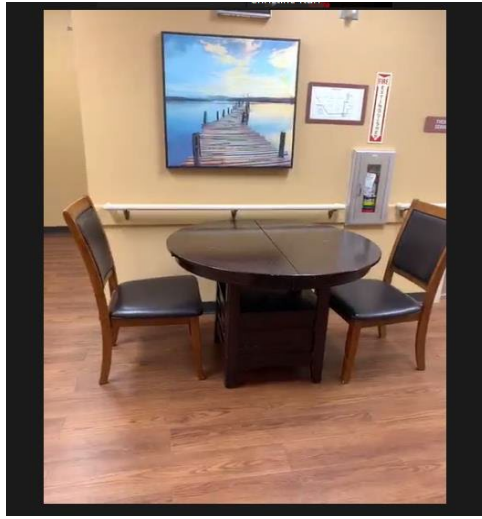


Comfortable seating area

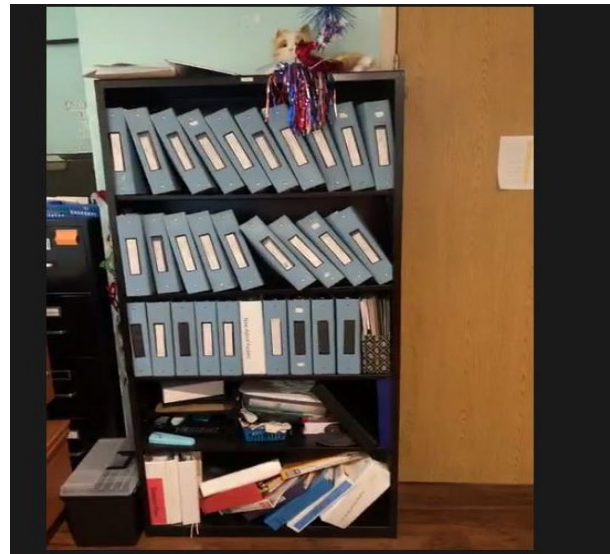
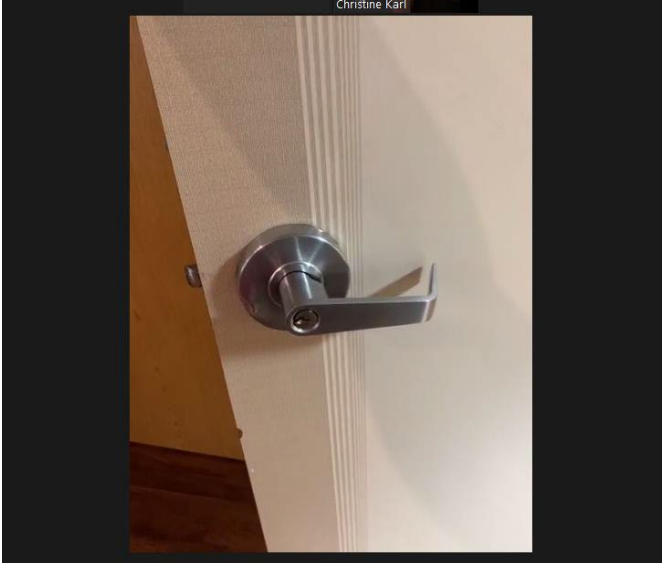


Resident Laundry room

General sitting area

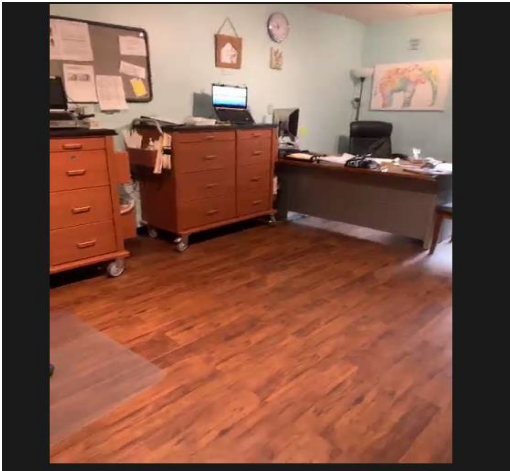


Locked nurses office – resident records, and nursing report given here

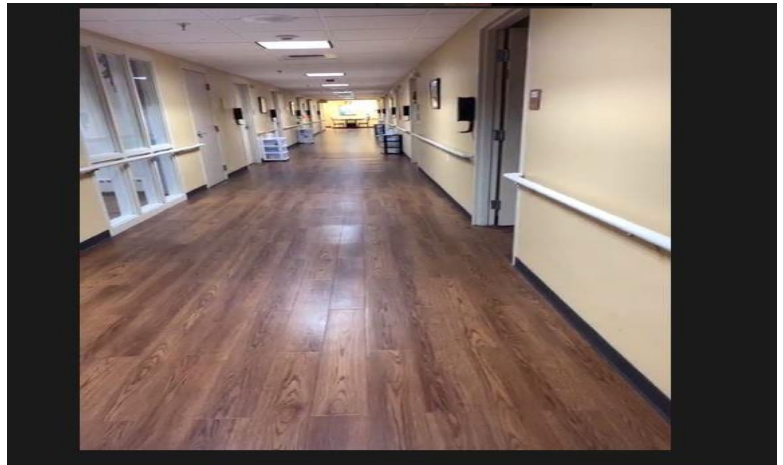


Electronic medication charting and locked med cart.

Assisted living Hallway



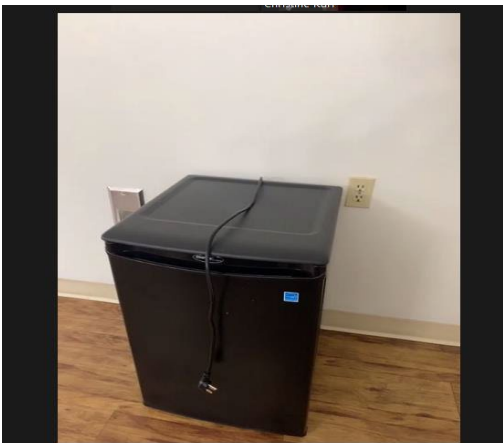
Entrance to resident room



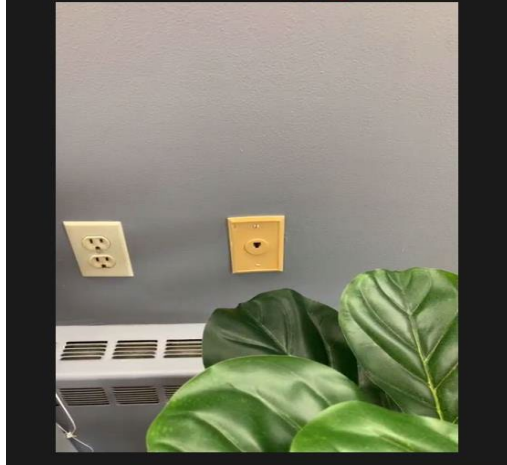
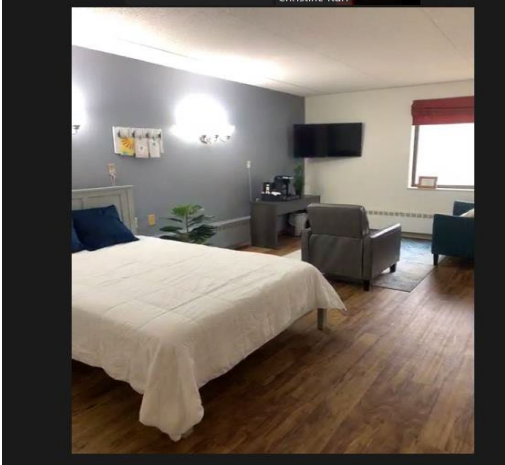
Inside the resident room



Refrigerators are available for individual units at an extra charge, or residents can bring their own



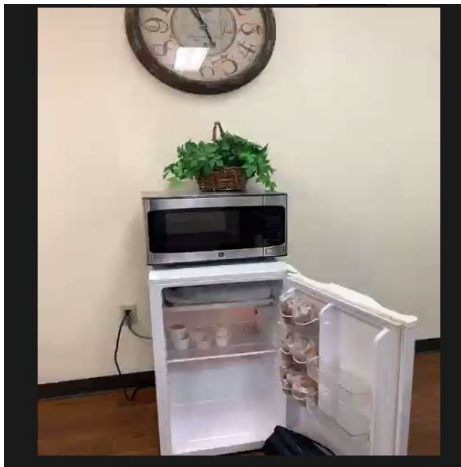
Resident room – all units are private rooms with landline connections on the wall.



Private bathroom







Dining room, with microwave and refrigerator for resident use. The fridge has some snacks available.



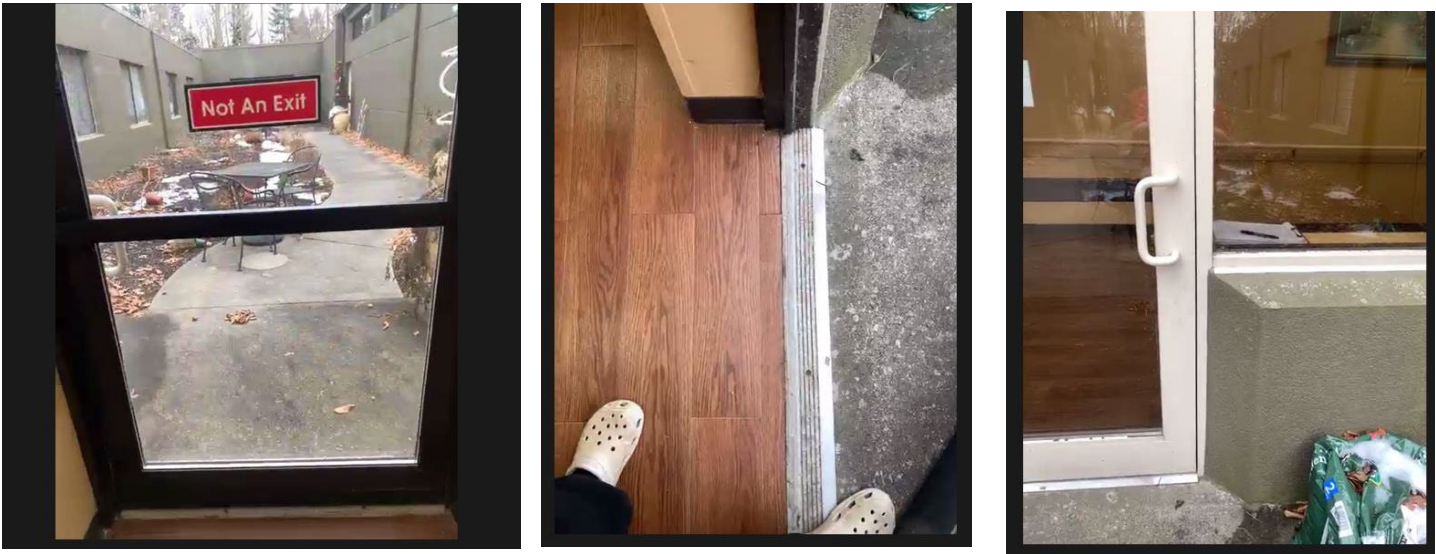
Mealtime and menu

1-2		1-3		1-4		1-5		1-6		1-7	
Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday
Breakfast	Breakfast	Breakfast	Breakfast	Breakfast	Breakfast	Breakfast	Breakfast	Breakfast	Breakfast	Breakfast	Breakfast
Lunch	Lunch	Lunch	Lunch	Lunch	Lunch	Lunch	Lunch	Lunch	Lunch	Lunch	Lunch
Dinner	Dinner	Dinner	Dinner	Dinner	Dinner	Dinner	Dinner	Dinner	Dinner	Dinner	Dinner

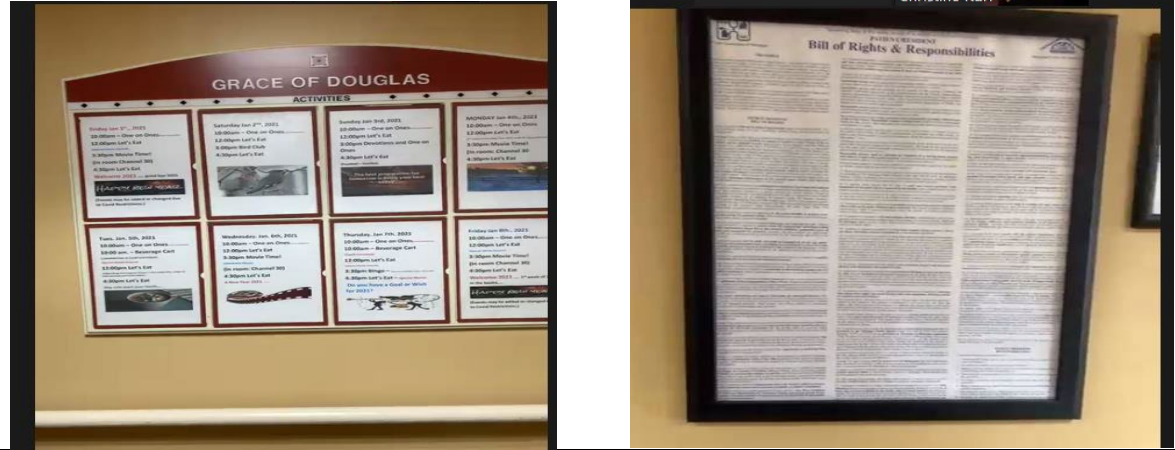
Ala Carte Menu	
	• Cottage Cheese
	• Various cold sandwich options
	• Cold and Hot Cereals
	• Yogurt
	• Soup of the Day
	• Grilled Cheese
	• Hamburgers/Cheeseburgers
	• Omelets/Cheese Omelets
	• Side Salad with Dressing
	• Chef Salad with Dressing
	• Grilled Hot Dogs



Doorway to the courtyard (contained within confines of the building)



Activities as well as Rights and Responsibilities posted on the wall



Locked door to the commercial kitchen and separated nursing facility dining room. Assisted living residents can visit with the nursing facility residents for meals if they choose.



How to submit a grievance

Grievance Policy

Title _____
Company/Community _____
Department(s) Addressed _____
Date _____

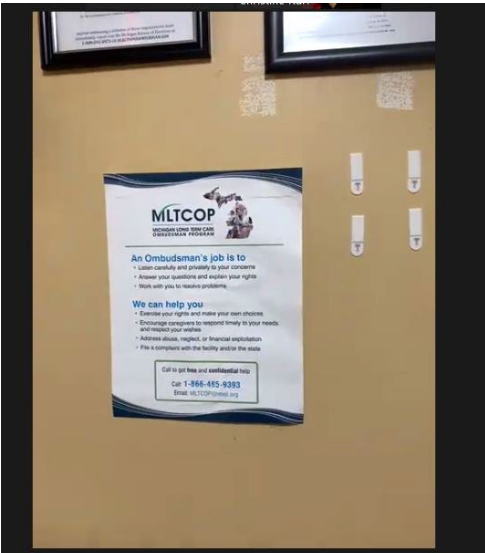
Policy: Any resident, his or her representative (spouse), immediate family member, or advocate may file a written or electronic grievance concerning his or her residence, nursing care, behavior of other residents, staff members, theft of property, etc., within five (5) days of discovery or request in any form.

Procedure:

1. Obtain a grievance/complaint form from the resident's station, any Department Director, or in the lobby area.
2. Answer all questions on the report form, if applicable.
3. Sign and date the form.
4. Give the completed form to the social service department or to the administrator. If the social service department is not open, or the administrator is not available, you may leave the report form with the charge nurse, or you may slide it under the door of the appropriate person you wish to handle the grievance/complaint.
5. Within ten (10) working days of the date you filed the report, you will be informed orally of the results of the investigation. (Complaints of abuse, harassment, or mistreatment will be immediately investigated.)
6. Should you disagree with the findings, recommendations, or actions taken, you may meet with the administrator, or you may contact the Great Healthcare Corporate Compliance Line at (800) 481-9685.
7. It is Great Healthcare's commitment to respond to the needs of our residents in a continuing effort to improve the quality of life for each of our residents. It is our desire to meet or exceed each of our residents' and family's needs.

[Signature] Date *April 19, 2017*

Ombudsman contact information



Section 4: Public Comment