

The State of Michigan
High Scrutiny Evidence packet

Provider's Name:
Northcrest Assisted Living Community

Location of the Setting: North Muskegon, Michigan	Type of Setting: Residential
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Waiver Services Being Provided at the setting:
Assisted Living

Heightened Scrutiny Prong

- Prong1: Setting is in a publicly or privately operated facility that provides inpatient institutional treatment
- Prong2: Setting is in a building or on the same grounds of, or adjacent to, a public institution.
- Prong3: setting has an effect of isolating individuals from the broader community

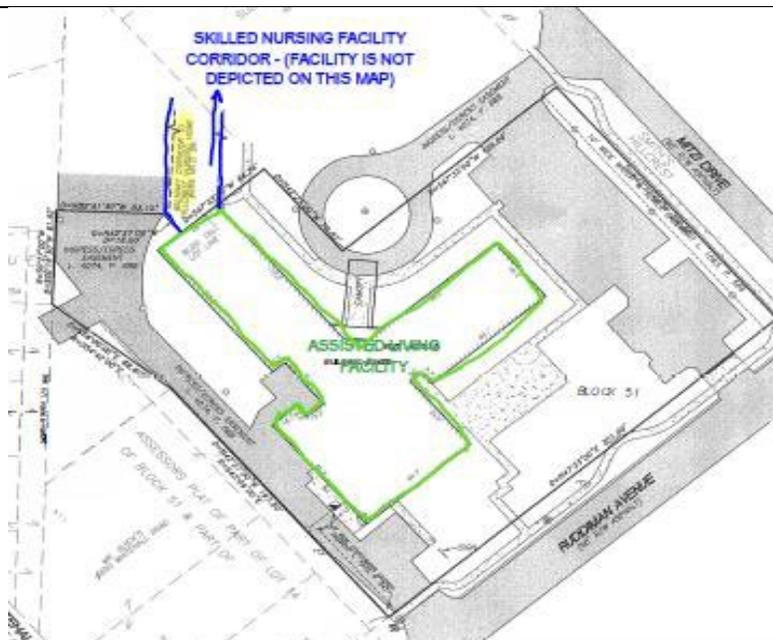
Recommendation

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.

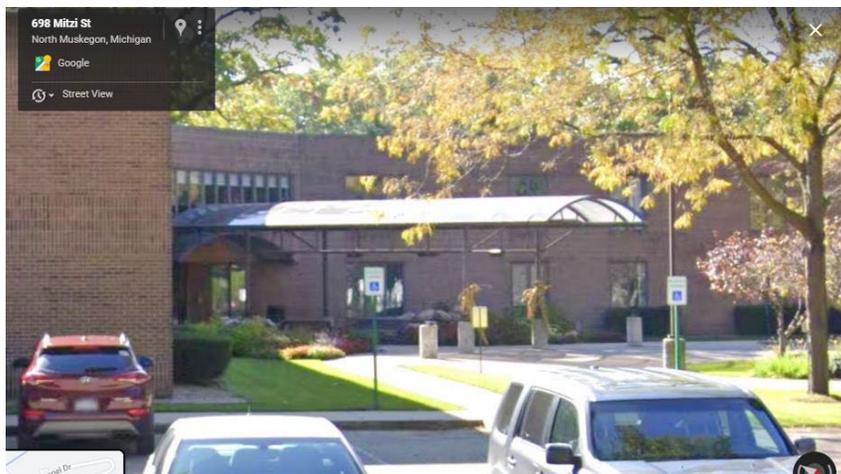
Section 1: Facility Description

The buildings are two separate entities sharing only an adjoining hallway between the assisted living facility (Northcrest) and a skilled nursing facility (Hillcrest). There are no shared staff, offices, and common areas between the nursing and assisted living facilities. The facilities are independently owned and share a building.

Residential options include single or double-occupancy units with in-suite bathrooms. There are some "jack and jill" set-ups with two single occupancy units sharing a common bathroom. In these situations, the doors to the single occupancy units from the shared bath may be individually locked. Mini-refrigerators are permitted in the units, and common kitchenettes with refrigerators and microwaves are available 24/7.



Licenses show different ownership of Hillcrest and Northcrest. The organization chart only references the Assisted Living organization. In 2018, Northcrest sold the attached Skilled Nursing Facility. The doors between the facilities remain locked unless a Northcrest assisted living facility resident wishes to visit someone in the skilled nursing facility. Staff assists the resident with entry to the skilled nursing facility.



Evidence:

- A1-Northcrest facility license, A2-Updated license renewal letter from MDHHS, A3-2019-2020 Northcrest Facility License
- B1 – Org Chart
- C1- Hillcrest SNF License (exp 2019), C2-updated Hillcrest SNF License (exp 7/2021)

- D1-Northcrest maps and pictures, website advertisements, floor plan options of available units
- H13-Available level of services, H15-Admissions level of care assessment, H18-Program Statement Attach



A1-FACILITY LICENSE.pdf



A2_updatedRENEWAL OF LICENSE FOR



A3-2019-2020 HFA License-NORTHCRES



B1 Robbinswood Org Chart.pdf



C-ADJOINING FACILITY LICENSE.pd



D1_Northcrest maps and pictures.p



H13-Available Services-Levels of Se



H15-Level of Care Assessment at Admi:



H18-Program Statement Attach G.

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

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

This setting does not limit residency based on disability or diagnosis. Residents are admitted regardless of disability or diagnosis as long as the setting is able to meet their needs.

There are options to use providers, supports, and services at the setting, but participants are able to choose to use options outside the residence if they choose to do so. 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.

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

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.

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 does not control residents' funds. Residents 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.

If the participant has a shared room, the participant has a choice of roommate. Participants have the freedom to furnish or decorate their rooms.

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.

This setting does not prohibit individuals from coming and going from the setting. Residents and visitors can enter or exit the facility at any time 24/7. The exterior doors are locked at 10:00 PM for safety reasons; however, staff will assist with entry/exit for individuals leaving or arriving after the door has been locked in the night. Residents and visitors must sign in and out at the reception desk.



The residents are free to move about the inside space of the home. The restricted areas inside include the maintenance area and cleaning supply areas. These areas have keypad entries and have a sign that says "employee only." There are no gates, locked doors, or other barriers preventing entrance/exit to the facility's common areas. The laundry area is locked and not considered part of the common area, but if residents want to do their own laundry, staff will let them into the laundry area.

The door to the memory care area is alarmed but not locked. The door leading to the skilled area is locked, and staff will assist residents who want to go through. For safety reasons, the outdoor common seating area is locked at 10:00 PM and does have a fence around the patio area with two gates. Staff stated that if the resident wished to utilize the area after 10:00 PM, it would be discouraged but not prohibited.



Evidence:

- D1_Northcrest maps and pictures
- H16-Copy of Resident Service Plan (area for elopement risk documentation)
- I1_Benie_BF interview, I2-Benie_GS interview (family reports being provided codes to traverse secure areas) I6_Benie_LW interview
- J2_Staff_JSimmer interview, J5_Staff_SSoto interview

The facility has wide hallways and entryways, making it readily accessible for mobility assistance devices. Common seating and dining areas are furnished and arranged in such a way as to accommodate assistance devices

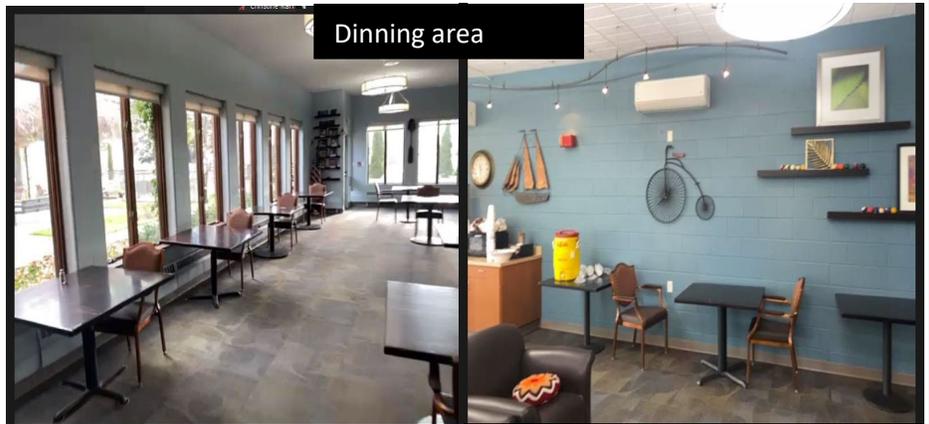
as well. All bathrooms are furnished with environmental adaptations to improve physical accessibility. Individual units will have additional accommodations such as toilet seat risers as needed.



Evidence:

- D1_Northcrest maps and pictures
- I1_Benie_BF interview, I6_Benie_LW interview (residents state use mobility devices)

This setting does not have restrictions on food. The setting does have scheduled mealtimes, but participants do not have to eat during those times. Residents can choose what they eat, when, where, and with whom they eat. Residents have full access to the facility dining area 24/7. Residents are encouraged to take meals in the dining room, but trays can be delivered to their units. Meal menus vary throughout the month, with some options available as alternatives to what is planned for the day. Snacks are available 24/7 and can be eaten wherever they want. Residents may also order take-out and delivery foods of their choice 24/7. They are encouraged to eat with others for social interaction but are not required. Residents can have visitors join them for meals, including private dinners at the facility, or they can leave to have meals outside the facility.

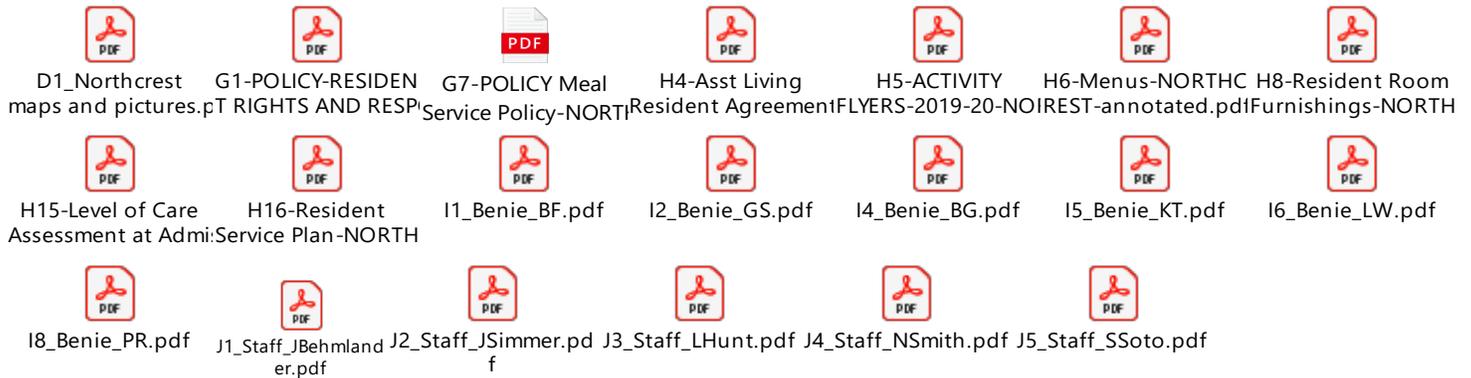


Evidence:

- D1-Northcrest maps and pictures
- G7-Meal Service Policy
- H6-Menus, H8-Resident Furnishings (mentions mini-fridge)
- I1_Benie_BF interview, I2_Benie_GS interview, I4_Benie_BG interview, I5_Benie_KT interview, I6_Benie_LW interview
- J2_Staff_JSimmer interview, J3_Staff_LHunt, J4_Staff_NSmith, J5_Staff_SSoto interview



- Direct observation of residents choosing where and with whom to sit during the afternoon meal



The setting does not 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 any other activity the participant chooses to participate in. Community events are open to all residents if they choose to take part. Residents may participate in other activities of their choice. Residents are free to choose activities, make personal appointments, and control their daily schedules.

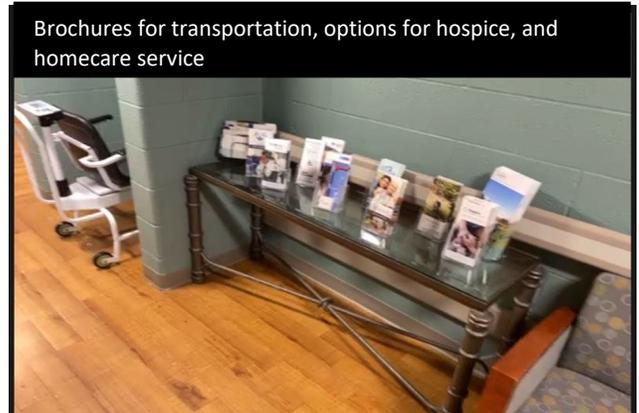


Forms in public area - maintenance, housekeeping, menu, and activity calendars

Evidence:

- D1_Northcrest maps and pictures (website advertising amenities)
- E2-Activities Director PD, E3-Wellness Manager PD, E4-Clinical Care Coordinator PD (mentions activities for all residents)
- G1-Policy on Resident Rights and Responsibilities, G8-MI Choice Description, G9-MI Choice MDHHS Description
- H-2 Resident Rights and Responsibilities, H4-Assisted Living Resident Agreement, H5-Activity Flyers, H7-Personal Service Options, H13-Available Services, H14-Activity Calendars
- I1_Benie_BF interview, I5_Benie_KT interview, I7_Benie_NJ interview (comments about shopping trips)
- J2_Staff_JSimmer interview, J5_Staff_SSoto interview (residents able to use personal funds as they wish)

The facility does not own a bus or van; however, a sister facility has one available for group outings. If this arrangement cannot be made, community transportation is used. For scheduled activities, a private bus is often rented by the facility. Staff will assist with bus schedules, cab arrangements, or private transportation via family and friends. There are several options for public transit available.



Evidence:

- E3 Wellness Manager PD (mention responsibility to assist with arranging transportation)
- H4-Assisted Living Resident Agreement, H7-Personal Service Options
- I1_Benie_BF interview, I2_Benie_GS interview
- J2_Staff_JSimmer interview, J4_Staff_NSmith, J5_Staff_SSoto interview

 D1_Northcrest maps and pictures.p	 E2-ACTIVITIES DIRECTOR-annotat	 E3-WELLNESS MANAGER-annotat	 E4-CLINICAL CARE COORDINATOR-ann	 G1-POLICY-RESIDEN T RIGHTS AND RESP	 G8-MI Choice Description.pdf	 G9-MI Choice MDHHS Description
 H2-Resident Rights info-NORTHCREST-:	 H4-Asst Living Resident Agreement	 H5-ACTIVITY FLYERS-2019-20-NOI	 H7-Personal Services Options-NC	 H13-Available Services-Levels of Se	 H14-2020-21 Activity Calendars-N	 I1_Benie_BF.pdf
 I5_Benie_KT.pdf	 I6_Benie_LW.pdf	 I7_Benie_NJ.pdf	 J1_Staff_JBehmland er.pdf	 J2_Staff_JSimmer.pd f	 J4_Staff_NSmith.pdf	 J5_Staff_SSoto.pdf

This setting does not limit communication devices. Individuals can have and use landlines, cell phones, personal computers, and TV's 24/7 without restriction. Residents are free to use personal communication devices such as cell phones, landline phones, personal computers, and tablets in private at any time. The facility has an iPad for sharing among those who do not own one – they are signed out like a library book and can be used privately. All units are wired for landline phones, and facility wi-fi is available.

Evidence:

- D1-Northcrest maps and pictures
- H2-Resident Rights
- I1_Benie_BF interview, I6_Benie_LW interview
- J2_Staff_JSimmer interview, J5_Staff_SSoto interview
- Direct observation of resident using a cell phone.

All participants have locks on the entry door to their room and have the keys. Necessary staff have keys to access private rooms in case of an emergency or if a resident uses a pullcord. All shared, or public restrooms are equipped with locks. Staff members are respectful of entering participants' private rooms. 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.

Evidence:

- D1_Northcrest maps and pictures
- I1_Benie_BF interview, I2_Benie_GS interview, I4_Benie_BG interview, I5_Benie_KT interview, I6_Benie_LW interview
- J1_Staff_JBehmlander interview, J2_Staff_JSimmer interview, J4_Staff_NSSmith, J5_Staff_SSoto interview
- Direct observation of staff during the site visit

This setting, as well as the MI Choice waiver program, prohibits the use of physical restraints and/or restrictive interventions. Staff receive training on individual rights and protections upon hire and annually thereafter.

Evidence:

- H2-Resident Rights,
- E3 Wellness Manager PD (mention responsibility for ensuring patient rights)
- F1_staff training log (resident rights and responsibilities), F2-staff communication
- G1_Policy Rights and Responsibilities, G2_Policy person-centered care (Robbinswood)
- J2_Staff_JSimmer interview, J3_Staff_LHunt, J5_Staff_SSoto interview

 D1_Northcrest maps and pictures.	 E3-WELLNESS MANAGER-annotat	 F1-RIGHTS AND RESPONSIBILITIES ST	 F2-Staff Information on Resident Rights-N	 G1-POLICY-RESIDEN T RIGHTS AND RESP	 G2-POLICY-PERSON CENTERED CARE-an	 H2-Resident Rights info-NORTHCREST-z
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Section 3: Additional Evidence

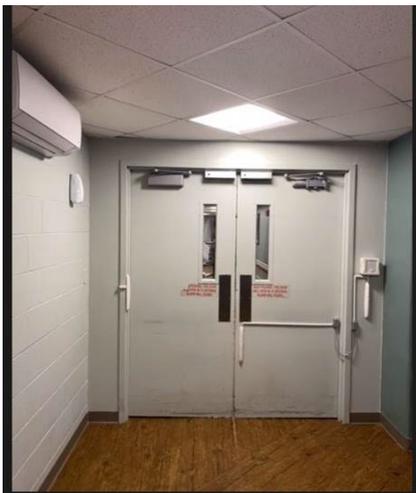
Accessible entrance



Comfortable sitting area



Doorway to memory wing



Accessible elevator



Memory care unit dining area



Kitchenette area



Vending machine available 24/7



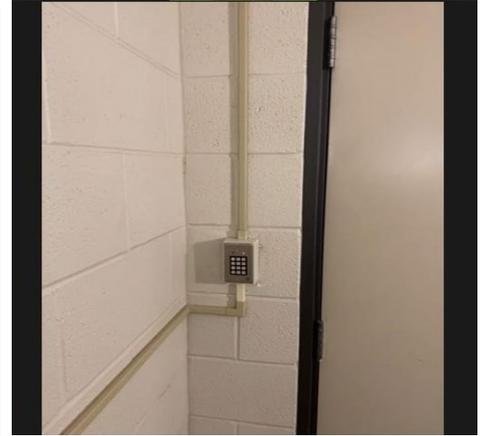
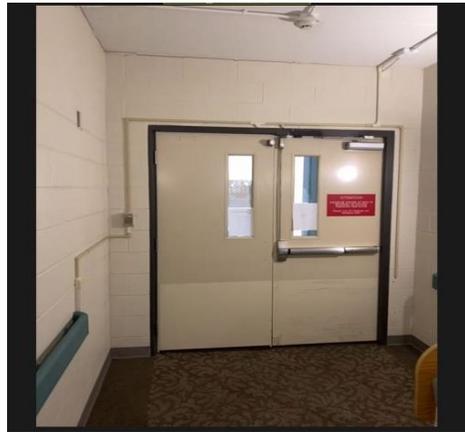
Accessible bathroom



Designated smoking area



Entrance to former SNF side (SNF now independently owned/operated as Hillcrest):



Public seating area;



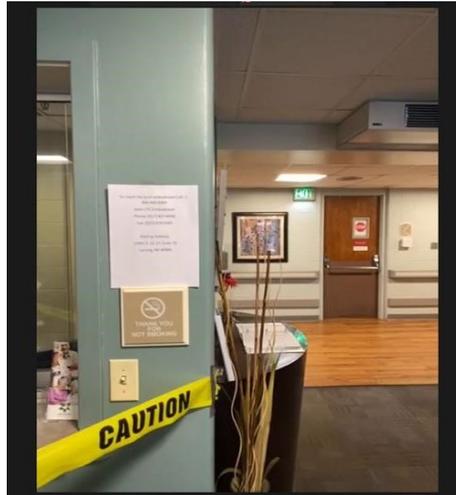
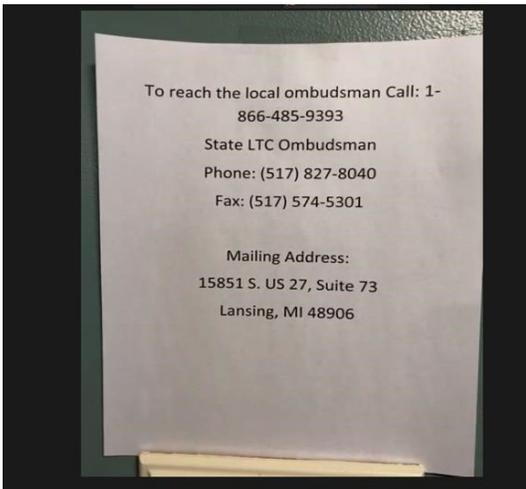
Front lobby of Assisted Living area: (the caution tape area is where people are dropping things off during covid and they are isolated there before being taken further into the facility)



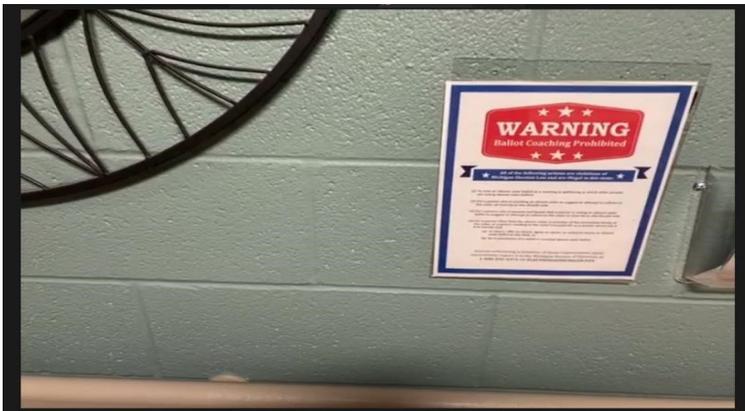
Posted general visiting hours but accommodations available 24/7 via sign-in/sign-out logs, exterior doors locked, and staff available to unlock 'after hours':



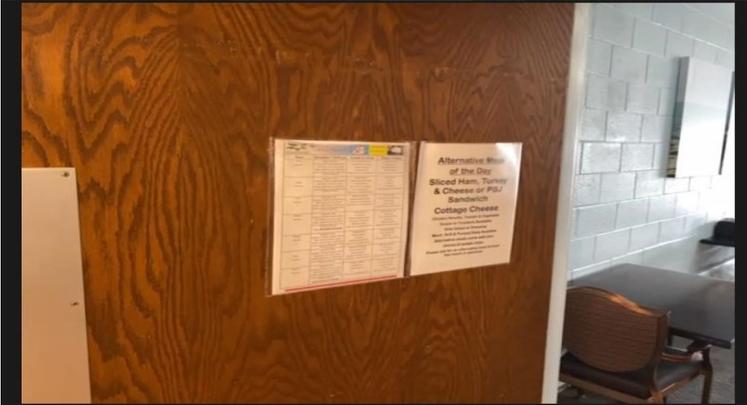
Front lobby posting of ombudsman info



Voting info posted



Weekly menu



Grocery/dollar store across the street:



Accessible button in courtyard back into the building:



Key needed for gate



Elevator to second floor AL area



Shower room/spa area



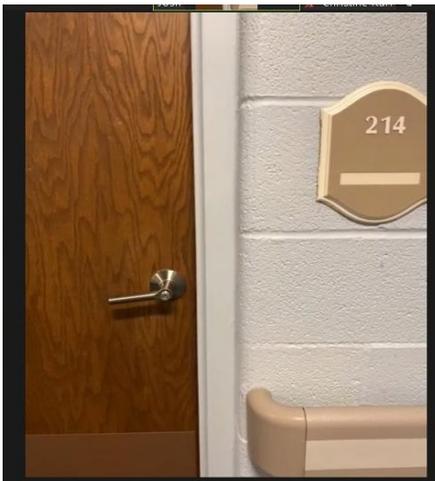
Inside room to the hallway, lockable

Interior door can lock from inside



Resident room

Furniture can be facility provided or resident provided



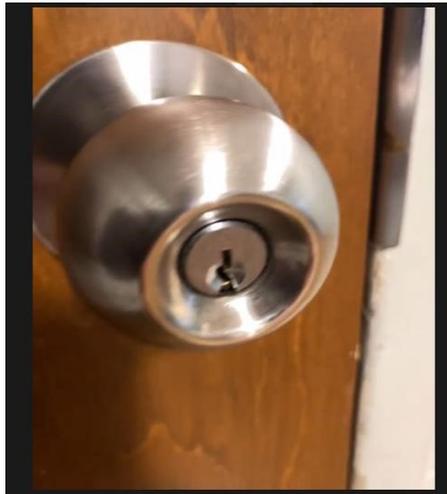
Community available microwave



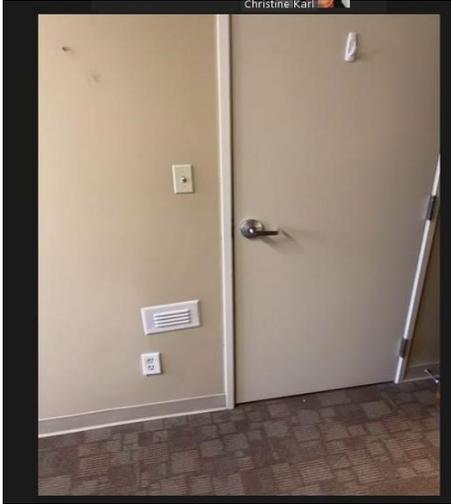
Public restroom



Staffroom – records and med cart locked

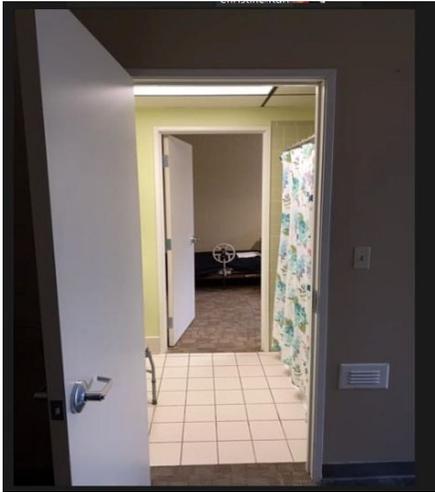


Shared bathroom for "jack/jill" apartment set up (2 private rooms sharing a bathroom area), doors lock from inside bathroom to each private room



Bathroom looking from 1 private room to the other

Bathroom looking from 1 private room to the other – lockable



Partition wall available for shared rooms if a resident wants a bit more privacy

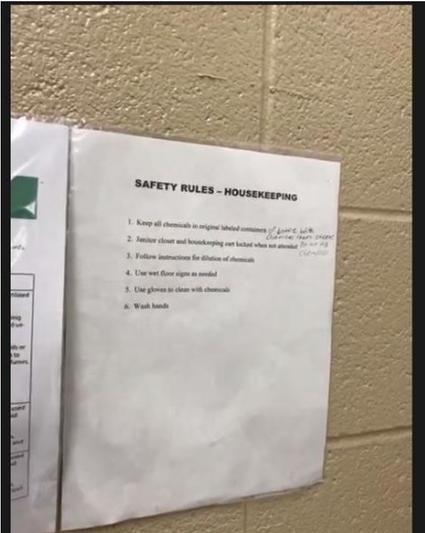
Closet area



Laundry area available to residents – staff, can assist if needed

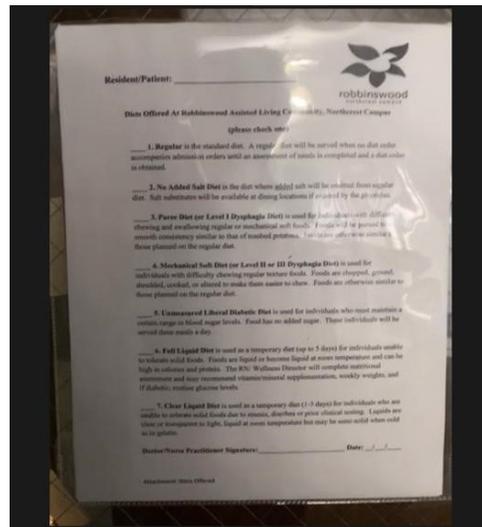


Laundry area available to residents – staff, can assist if needed

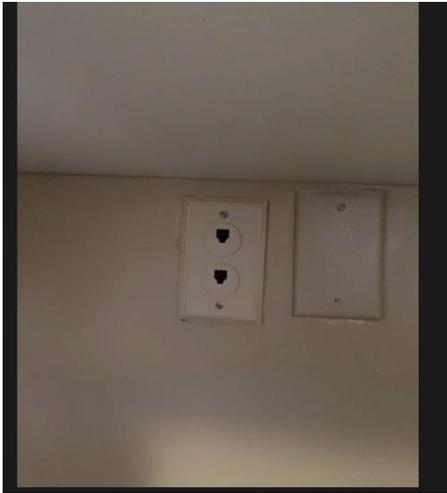


Phone jack in-room

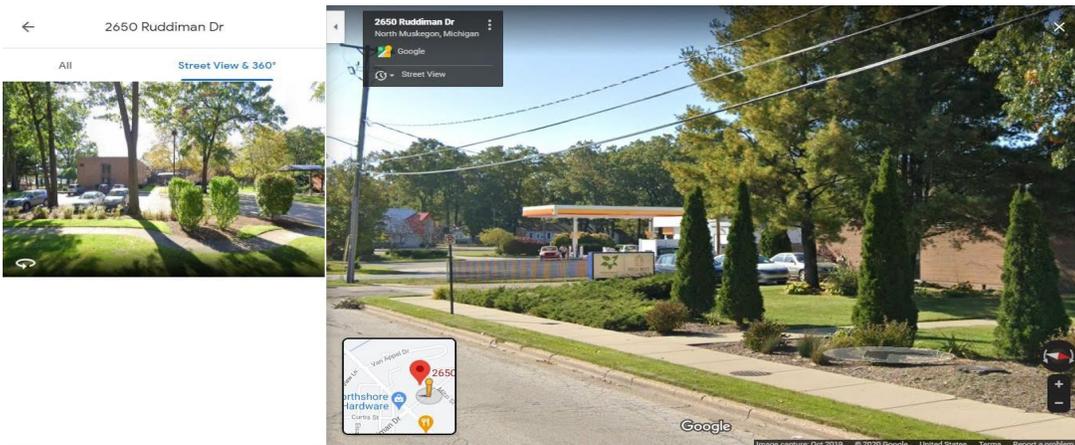
Diet options offer



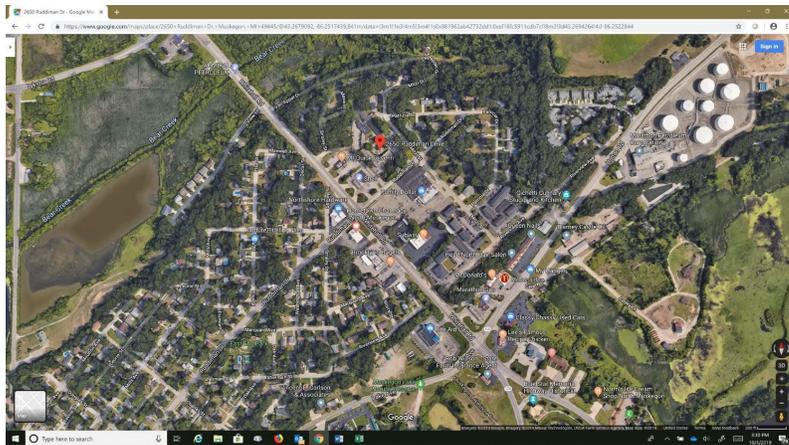
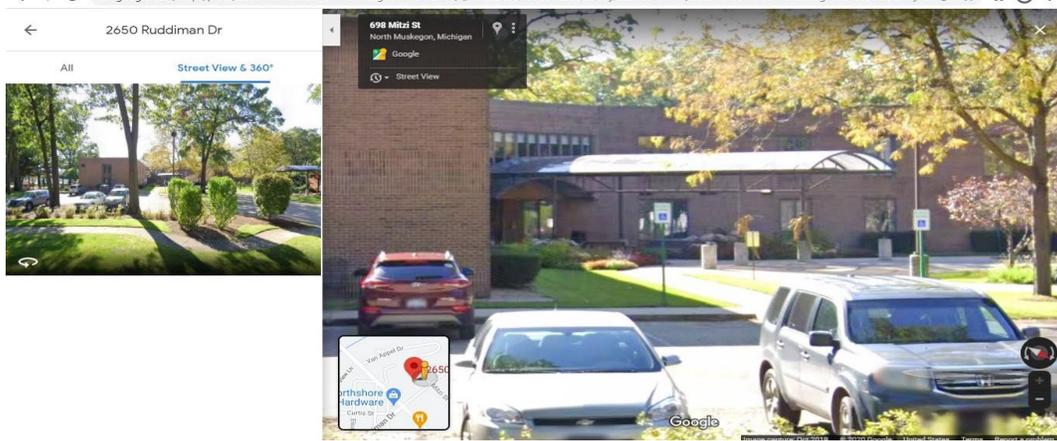
Additional Suggestion box to receive activity



Hillcrest is skilled facility area, Robbinswood (Northcrest) is assisted living



Robbinswood entrance



Section 4: Public Comment

