

The State of Michigan

High Scrutiny Evidence packet

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| Provider's Name: Pilgrim Manor | |
| Location of the Setting: Grand Rapids, 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

Pilgrim Manor is owned by the Ohio-based corporation United Church Homes. All direct care managerial staff for the facility are in Michigan. Decision-making for the facility regarding day-to-day operations and facility-specific policies are made locally by facility managerial staff. The facility utilizes a "neighborhood" concept. The assisted living neighborhoods include Valley Grove and Forest Grove; Garden Grove, the secure memory care assisted living neighborhood; Ridgewood, the designated skilled nursing neighborhood; Birchwood is the rehab neighborhood.

The assisted living facility (ALF) and Skilled Nursing Facility (SNF) are in the same building, separated by a keypad-accessed entrance and exit door. Only facility staff has the entrance code. Staff assists residents who wish to visit one another between the facilities. Residential options in the assisted living facility areas include studio, one-bedroom, and two-bedroom suites. Units may be private or shared, although most are privately rented. There are three kinds of apartments available, and all have the ability to lock the entrance doors, and residents have the keys.



1. A combination bed area, seating area, kitchenette room with an attached bathroom
2. A combination of two rooms, one room has a bedroom and attached bathroom, which has a door on it; the other room can be set up as a combination of bed, seating area, and kitchenette room. These two rooms are separated only by an archway, no door.
3. A combination of two rooms, one has a bedroom and attached bathroom, which has a door on it; the other can be set up as a combination of bed, seating area, kitchenette room. These two rooms are separated by a door that **does not** lock.

Evidence:

- A1-ALF License Extension letter, A2-HFA Online information
- C1-SNF License
- D1- Maps and pictures, D2-Facility map
- J1 Staff Capsica, J2 Staff KVagnetti interviews



A1-ALF License
2021-letter-PILGRIM license information.



A2-HFA Online



B-2 GOVERNANCE-



C1-Adjoining



D1_maps and
pictures.pdf



D2-Facility
Map-PILGRIM MANC



J1 Staff
CParsaka.pdf



J2 Staff
KVagnetti.pdf

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.

Residents may employ their own personal service assistants in addition to the facility staff. Onsite services include facility physician, PT, OT, Speech, Rehab, mobile radiology, respiratory services, and hairstylist. Residents are not required to use the facility physician. They can make appointments with the hairstylists or other support service personnel within the setting or are free to make appointments with others within the broader community.

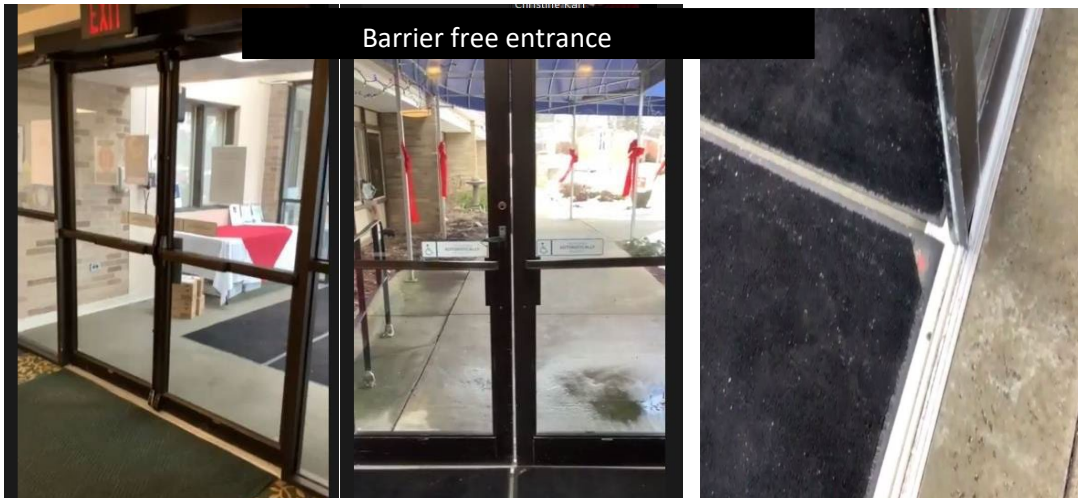
Residents may do their own laundry, or staff will assist. The residents' laundry room is available 24/7; staff will provide full laundry service if requested.

Evidence:

- D1- Maps and pictures (screenshots)
- G9Person-Centered Planning Policy,
- H2Person-Centered Care Plan sample (identifies son and friend to be involved in care/decisions), H3- Resident Agreement, H4-Resident FAQs, H5.1-UCH Resident Handbook, H5.2-Pilgrim Manor Resident Handbook, H5.3 2021 Pilgrim Manor Resident Handbook, H9- 2021 Resident Handbook
- J1 Staff CParsaka, J2 Staff KVagnetti interviews

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. The memory care unit residents are accompanied by staff when they go outside of the facility. Residents without memory impairment or severe dementia are not restricted in movement on the facility grounds. There are two outside patio areas, one of which is fenced for the memory care unit. The Facility grounds are barrier-free.

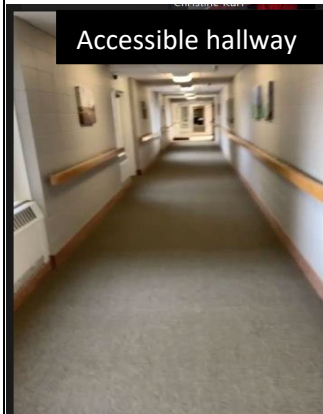
This setting does not have visiting hours. Participants can come and go 24/7. Participants at this setting are able to come into the setting at all hours. Visitors and residents may come and go from the facility at will, within their personal care plan limits, e.g., memory and dementia residents may have restrictions. A sign-in and out system is in place for residents and visitors.



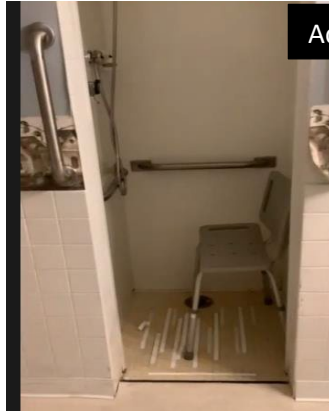
Evidence:

- G12-Visiting Policy
- H4 Resident FAQs, H5-UCH Resident Handbook; H5.2 Pilgrim Manor Resident Handbook
- J1 Staff CParsaka, J2 Staff KVagnetti interviews

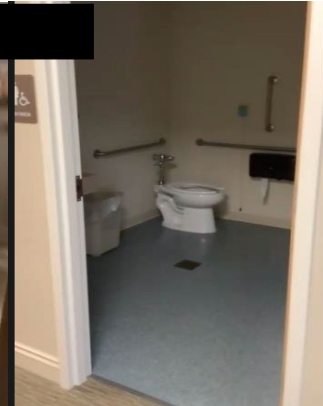
Environmental adaptations are in place in hallways, bathrooms, entrances, and exit doors and include flush transitions between rooms, indoors and outdoors, grab bars in bathrooms and handrails in hallways.



Accessible hallway



Accessible bathroom



Evidence:

- D1-Maps and pictures
- J1-Staff CParsaka, J2-Staff KVagnetti interviews

For safety reasons, the memory care unit is locked; family members have codes to get in. Non-memory care areas are unlocked and barrier-free. The main kitchens are not open to residents during meal preparation and serving times, but kitchenettes are available at all times. The memory care unit restricts access to that neighborhood's laundry area – staff must assist.

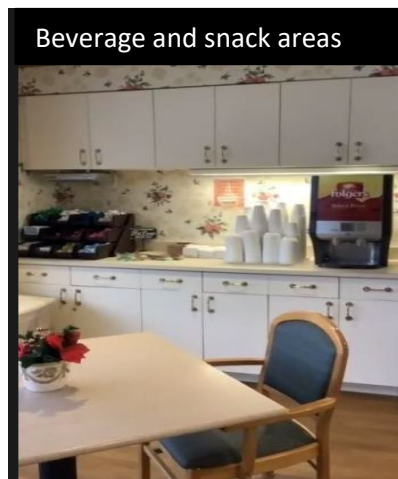
Evidence:

- D1-Maps and pictures
- J1-Staff CParsaka, J2-Staff KVagnetti interviews

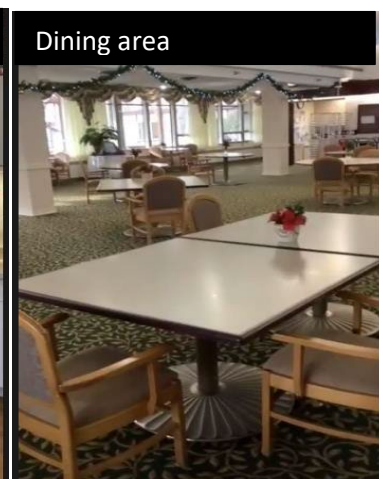


Door to AL memory care

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. Dining in the dining room is encouraged at mealtime but not required. Residents can either get their meal and take it to their room or order a tray to be delivered to their room for a nominal charge. If the resident is ill, the tray will be delivered without charge. Residents may choose from a variety of meal selections. There is a featured entrée and several alternatives at every meal. There are snack and beverage areas in each grove. The individual's special dietary needs and wishes are also considered, and assistance is given with food selections if requested.



Beverage and snack areas



Dining area

The kitchenette areas of the facility are open 24/7 and stocked with food and beverages; staff can assist with getting snacks. Some residents also keep snacks in their apartments and furnish their own small refrigerator and

microwave for their personal use. Personal refrigerators are required to have thermometers for food safety. An onsite mini-market and coffee shop also provide food choices.

Residents are free to dine alone or with companions of their choice. Outside guests can join them for meals for a nominal charge. Residents may reserve private dining areas for events with family and friends.














Residents have full access to comfortable sitting areas and rooms throughout the facility. Comfortable furniture is spaced to accommodate those with assistive mobility devices. Residents may also use these areas to visit with their guests. They can also entertain guests in their own units.



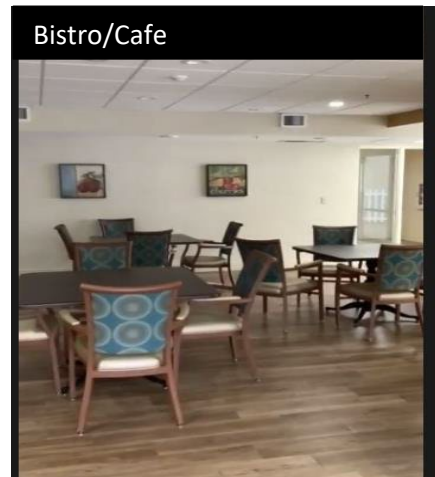
Evidence:

- D1-maps and pictures
- E21-Director of Resident Activities position description, E24-Personal Care Assistant
- H1-Activity Calendars, H4- Resident FAQs, H5.1-UCH Resident Handbook, H5.2-Pilgrim Manor Resident Handbook, H5.3 2021 Pilgrim Manor Resident Handbook, H6-Resident Helpful Information
- I1-Benie MM interview
- J1 Staff CParsaka, J2 Staff KVagnetti interviews



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|  |  |  |  |  |  |  |
| D1_maps and pictures.pdf | E21 DIRECTOR OF RESIDENT ACTIVITIES | E24 PERSONAL CARE ASSISTANT-JO | G9-Person Centered Planning | G12-Visiting Policy-PILGRIM MAN | H1--2020-21 Activity Calendars-PILGRIM I | H2--Person Centered Care Plan- |
|  |  |  |  |  |  | |
| H3-Resident Agreement-PILGRIM | H4-Resident FAQs-PILGRIM MAN | H5.1 UCH Resident Handbook-Pilgrim | H5.2 2019 Pilgrim Manor Resident Har | H5.3 2021 Pilgrim Manor Resident Har | H6-Resident Helpful Information | |

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. Staff will assist them with reminders of scheduled appointments and activities of their choice. The staff will provide scheduling assistance if requested. There is a coffee shop and convenience store onsite, or residents may arrange for transportation to stores within the broader community.



Evidence:

- E10-Nursing Assistant position description, E21-Director of Resident Activities position description
- H1-2020-2021 Activity Calendars; H3-Resident Agreement, H4-Resident FAQs, H5.1-UCH Resident Handbook (p. 24 MI Resident Rights mentions the source of payment); H5.2- 2019 Pilgrim House Resident Handbook; H5.3-2021 Pilgrim Manor Resident Handbook Update; H6-Resident Helpful Information
- J1 Staff CParsaka, J2 Staff KVagnetti interviews

The facility is on a regular public bus route. The facility has an accessible van used for group outings and does not provide rides to private appointments. Staff will help residents arrange for a ride from public transit or from friends and family. Individuals may also have their own vehicles on site.

Evidence:

- H4-Resident FAQs, H5.2-Pilgrim Manor Resident Handbook, H5.3-2021 Update Pilgrim Manor Resident Handbook
- J1-Staff CParsaka, J2-Staff KVagnetti interviews



E10 NURSING
ASSISTANT- STNA-CI



E21 DIRECTOR OF
RESIDENT ACTIVITIES



H3-Resident
Agreement-PILGRIM



H4-Resident
FAQs-PILGRIM MANOR



H5.1 UCH Resident
Handbook-Pilgrim Manor



H5.2 2019 Pilgrim
Manor Resident Handbook



H5.3 2021 Pilgrim
Manor Resident Handbook



H6-Resident
Helpful Information



J1 Staff
CParsaka.pdf



J2 Staff
KVagnetti.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 keep and use personal communication devices such as cell phones and tablets privately any time they wish to do so. The facility provides computers and tablets for use in private or in the library.

Evidence:

- D1- maps and pictures showing computer center open for resident use
- H5.1 UCH Resident Handbook (MI Resident Rights), H6-Resident Helpful Information,
- J1-Staff CParsaka, J2-Staff KVagnetti interviews

Public computer area



Library



All participants have locks on the entry door to their room and have the keys. Only the resident and the maintenance staff have key access to the units. All shared, or public restrooms are equipped with locks. Staff members respect individual privacy when entering and individuals' space. 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 participant's private room to conduct a welfare check.











Evidence:

- D1-maps and pictures
- F3-Training Materials (Person-Centered Care), F5-2021 Staff Training Record
- H5.2 Pilgrim Manor Resident Handbook, H5.3 2021 Pilgrim Manor Resident Handbook,
- J1 Staff CParsaka, J2 Staff KVagnetti interviews
- Direct observation during 2019 site visit

This setting, as well as the MI Choice waiver program, prohibits the use of physical restraints and/or restrictive interventions. Staff training on individual rights and protections is provided through RELIAS, Health Care Academy Online, upon hire and annually thereafter.

Evidence:

- F2-Training Agenda – HIPAA, F4-Relias Online Training Subjects (required), F5-Staff Training Records
- H5.1 UCH Resident Handbook (MI resident rights)
- G1-Policy Orientation and Training, G13-Abuse/Neglect Policy
- J1 Staff CParsaka, J2 Staff KVagnetti interviews

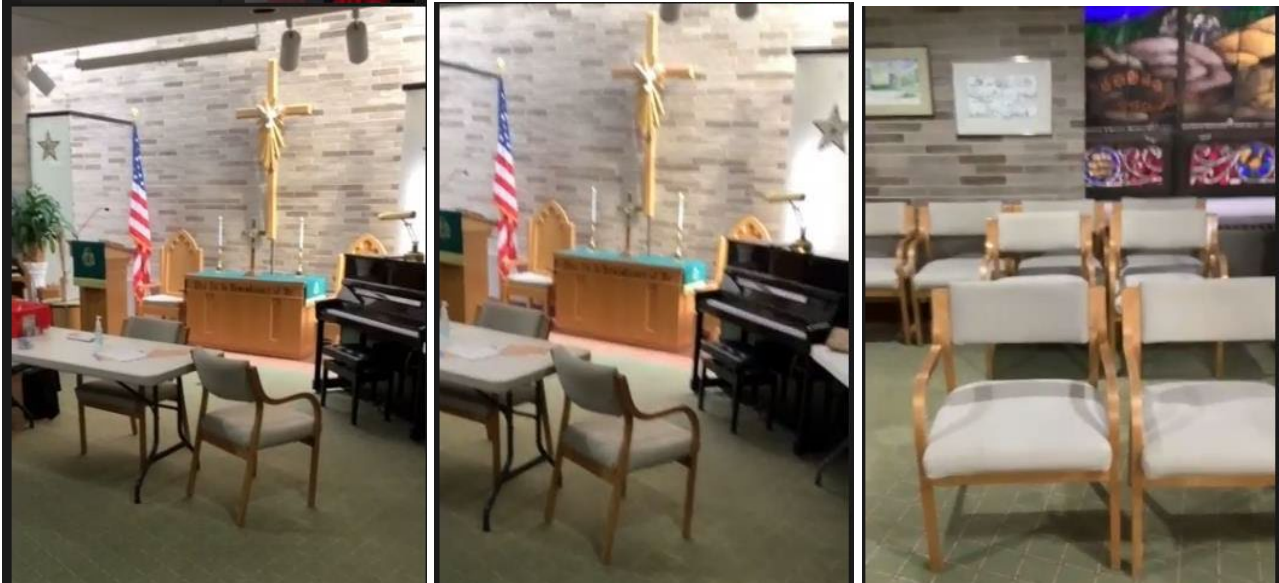
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| D1_maps and pictures.pdf | F2 TRAINING-AGENDA-TRAINING-PERSON (MODULE LIST-annot | F3 | F4 RELIAS TRAINING | F5 2021 Staff Training Records-PII | H5.1 UCH Resident Handbook-Pilgrim | H5.2 2019 Pilgrim Manor Resident Har |
|  |  |  | | | | |
| H5.3 2021 Pilgrim Manor Resident Har | J1 Staff CParsaka.pdf | J2 Staff KVagnetti.pdf | | | | |

Section 3: Additional Evidence

Front vestibule



Chapell area



Private room



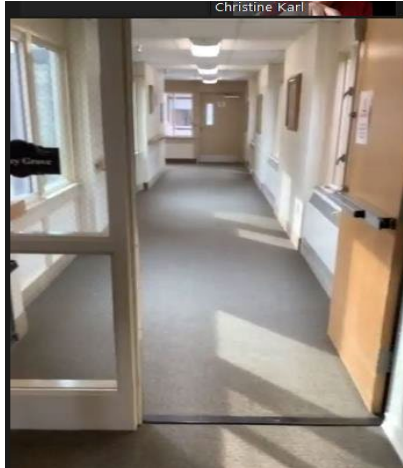
Accessible Elevators



Snack station



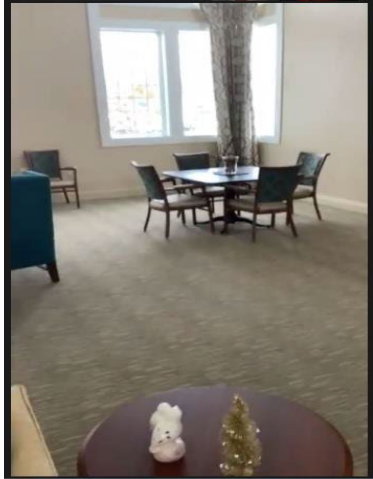
Accessible doorway



Comfortable sitting area (sunroom)



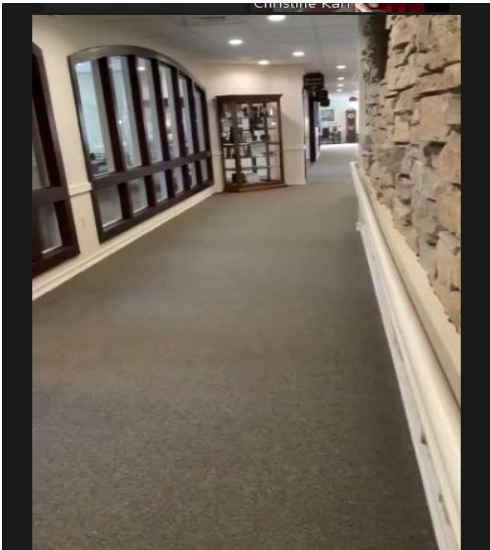
Courtyard



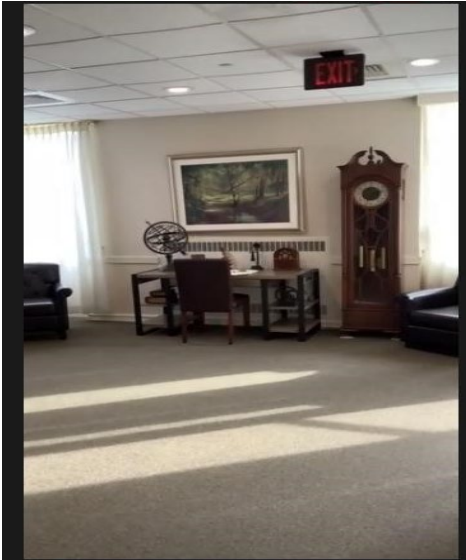
Sign-in sign-out book at the front desk:



Hallway with handrail to the right:



Library



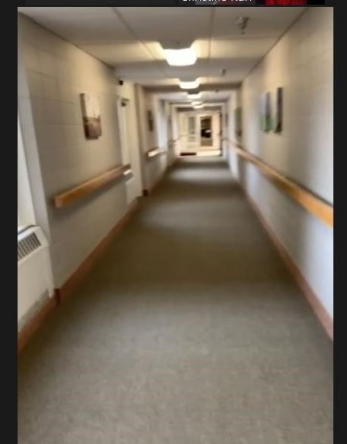
Resident mail box



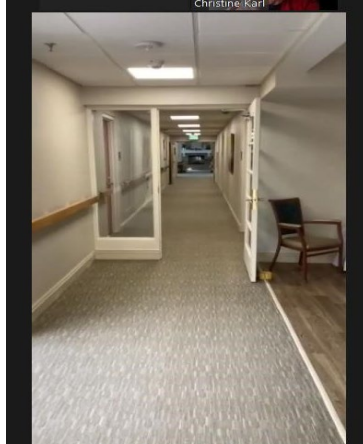
Outgoing mail box



Hallway to forest grove



Hallway to hearth room



Public bathroom



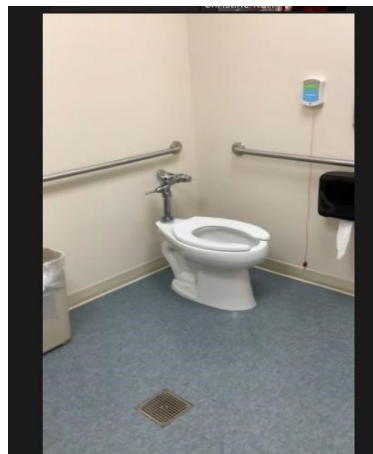
Exterior door to public bathroom



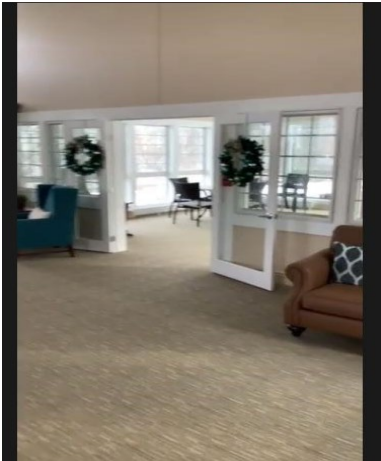
Interior lock shot



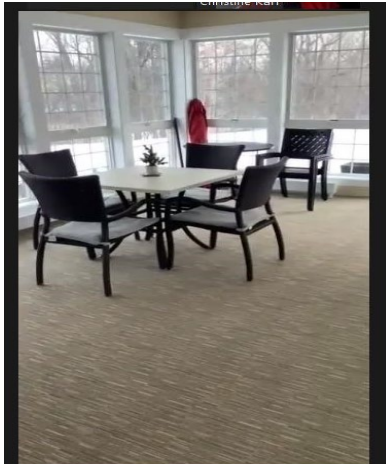
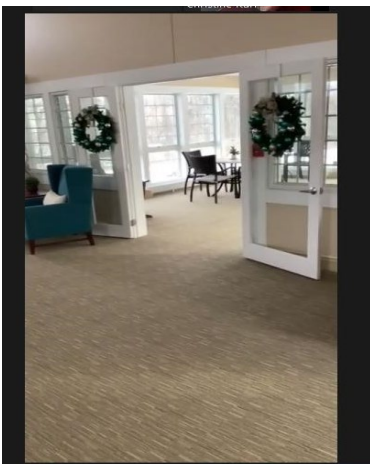
Accessible sink



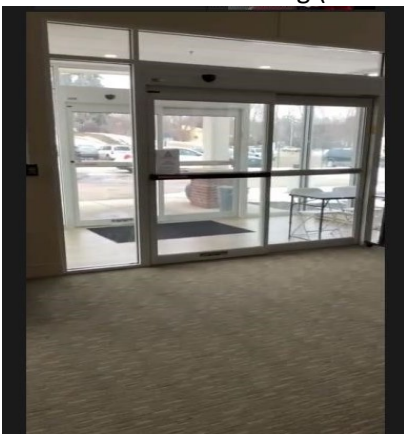
Hearth room



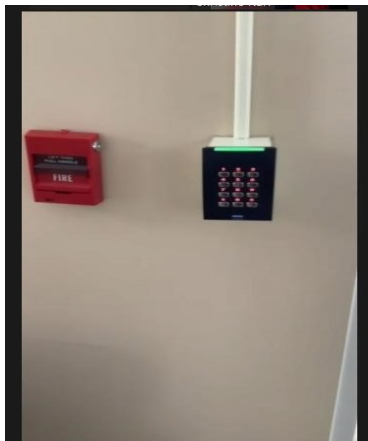
Sunroom area off hearth room



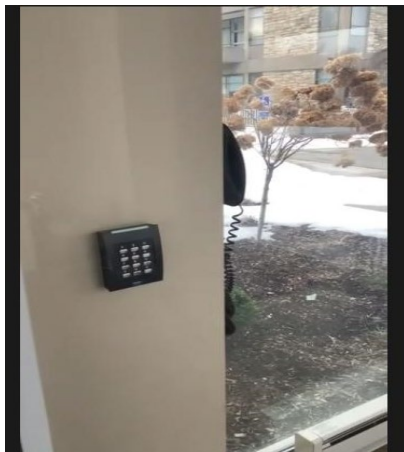
Entrance to assisted living (currently restricted for covid – running people through one main door for screening)



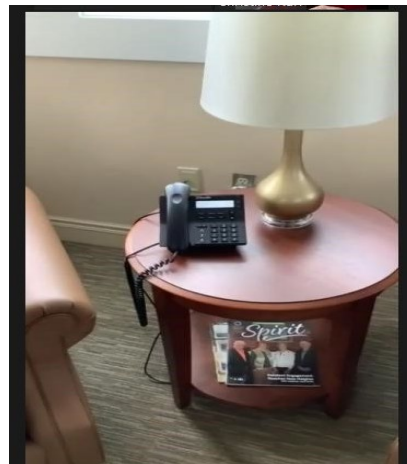
Keypad access/phone to AL entrance



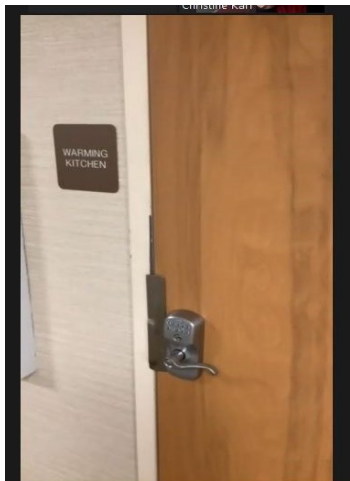
Keypad to get out



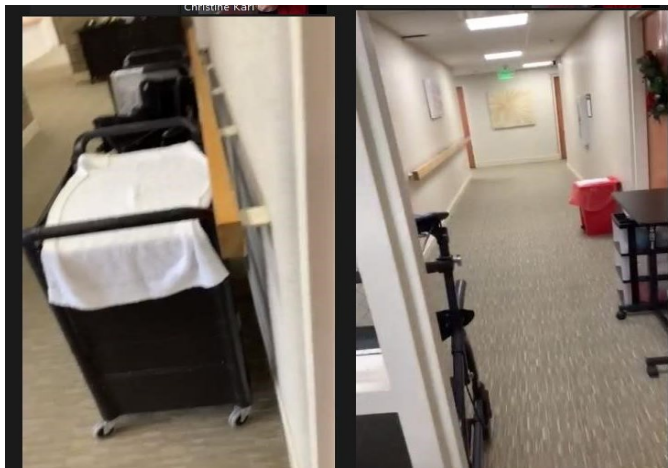
Public phone



Commercial kitchen area – restricted by keypad



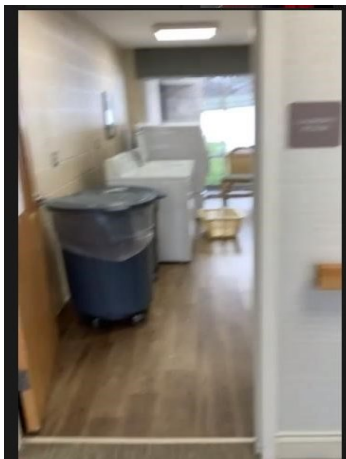
Hallway (carts temporary)



Laundry room



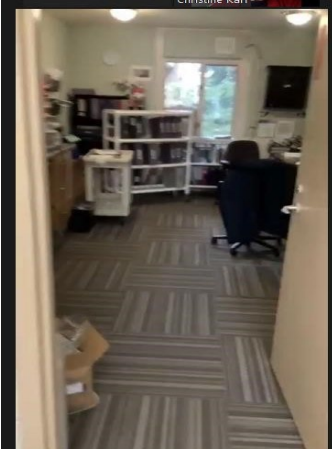
No lock for residents



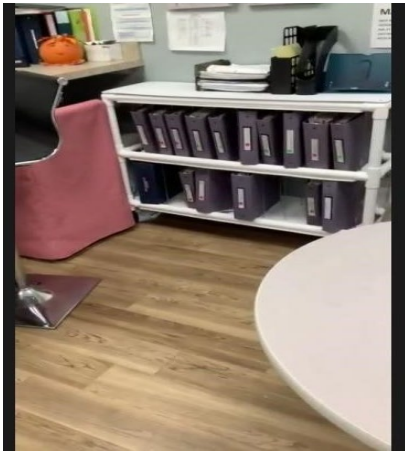
Folding table



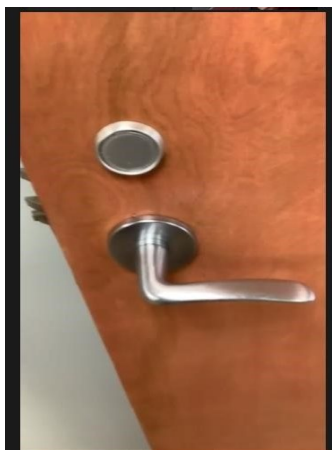
Nurse's station Nurse's station does lock



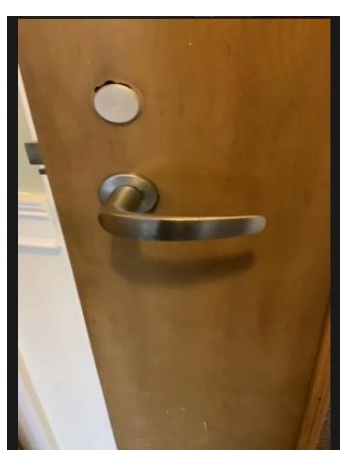
Charts maintained in nurse's office



No lock to the nursing office



Door to the resident room from the hallway: - only maintenance has keys to open aside from residents



Entrance to valley grove



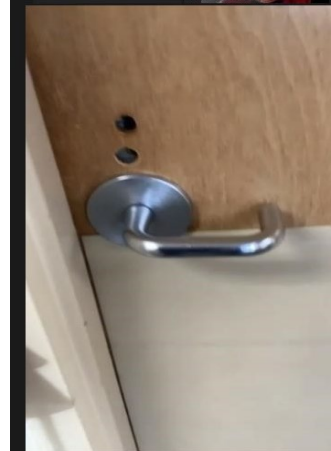
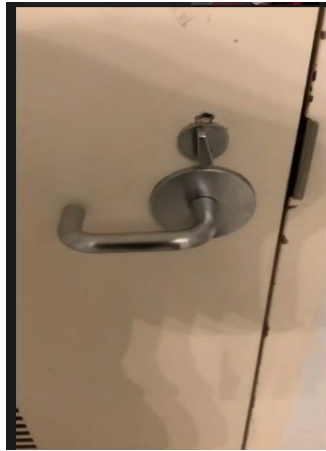
Each grove other than the memory area have own laundry



Spa area for bath assist



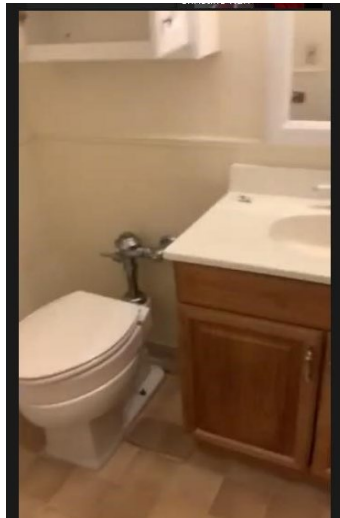
Door does lock Interior& Interior



Resident's room bathroom

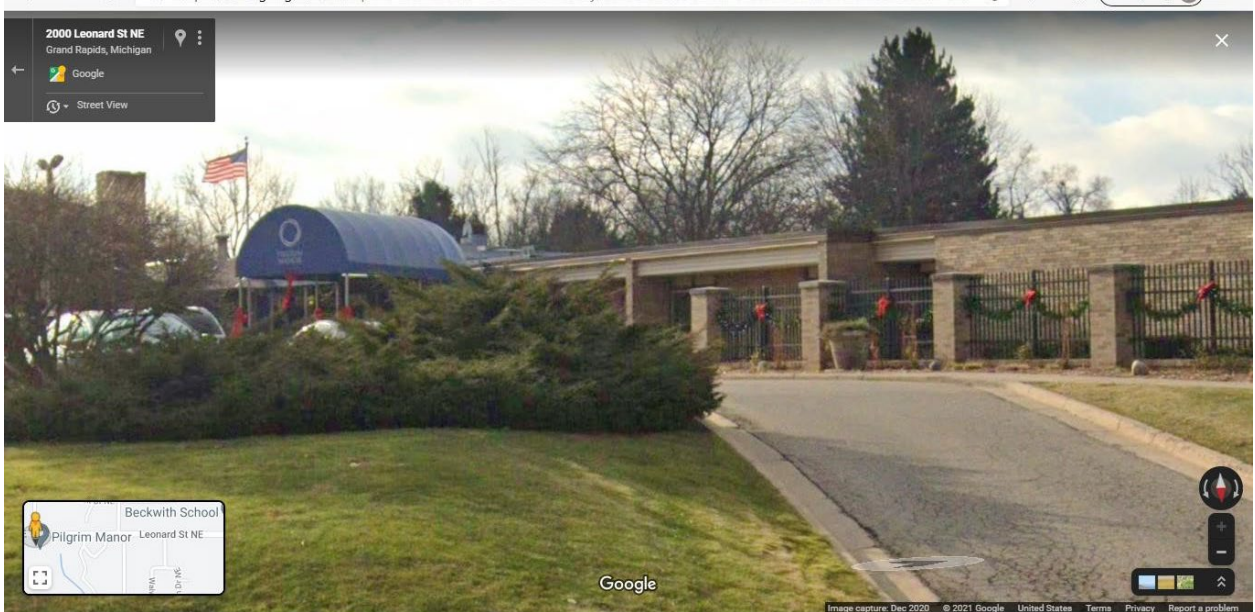


Resident room bathroom – no lock





Entry view from the street



Section 4: Public comment