



January 11, 2024

Cedric Key, Authorized Agent
Key 360 Support Services LLC
4124 Quebec Avenue North, Suite 101
Minneapolis, MN 55427

License Number: 1090600 (Home and Community-Based Services)

License Number: 1096143 (Community Residential Setting)

License Number: 1097300 (Community Residential Setting)

CORRECTION ORDER AND NONCOMPLIANCE WITH TERMS OF A CONDITIONAL LICENSE

Dear Cedric Key:

On December 16, 2022, the Commissioner of the Department of Human Services (DHS) issued an Order of Conditional License to Key 360 Support Services, LLC located at 4124 Quebec Avenue North, Suite 101, Minneapolis, Minnesota.

On November 1, 2023, a licensing review of Key 360 Support Services LLC was conducted to determine compliance with state and federal laws and rules governing the provision of home and community-based services (HCBS) to persons with disabilities and age 65 and older under Minnesota Statutes, Chapter 245D and the terms of the Order of Conditional License issued on December 16, 2022. As a result of this licensing review, a Correction Order and Noncompliance with the Terms of a Conditional License is being issued.

A. Reason for Correction Order and Noncompliance with the terms of Conditional Order.

Pursuant to Minnesota Statutes, section 245A.06, if the Commissioner of the Department of Human Services (DHS) finds that the license holder has failed to comply with an applicable law or rule and this failure does not imminently endanger the health, safety, or rights of the persons served by the program, the Commissioner may issue a Correction Order to the license holder.

The following violation(s) of state or federal laws and rules were determined as a result of the licensing review. Corrective action for each violation is required by Minnesota Statutes, section 245A.06 and is hereby ordered by the Commissioner of Human Services.

Service Recipient Violations

1. Violation: For one person whose record was reviewed (P2) the license holder did not document health needs as required.

The license holder was assigned the responsibility of meeting P2's health needs. The license holder failed to document a description of the procedures the license holder would follow in order to:

- provide medication setup, assistance, or administration;
- monitor health conditions according to written instructions from a licensed health professional; and
- assist with or coordinate medical, dental, and other health service appointments.

P2 had multiple diagnosis listed throughout their support plan. The license holder failed to maintain documentation of how these diagnosis would be monitored. Additionally, P2 was prescribed a PRN medication. The license holder failed to document a description of how and when this medication was to be administered.

Statute Violated: Minnesota Statutes, section 245D.05, subdivision 1, paragraph (b).

2. Violation: For one person whose record was reviewed (P2), the license holder did not meet the requirements for medication administration as required.

The license holder completed medication administration record (MAR) reviews for P2 each month, however the license holder failed to identify and document medication errors on the review. MAR reviews completed for P2 stated that there were no medication errors found; however, there were numerous dates in P2's MARs that were not documented as administered with no explanation provided.

Statute Violated: Minnesota Statutes, section 245D.05, subdivision 4, paragraph (a).

3. Violation: For one person whose record was reviewed (P2), the license holder did not meet the requirements for safekeeping of funds as required.

The license holder was assigned the responsibility of assisting P2 with safekeeping of funds. The license holder failed to survey, document, and implement P2's legal representative and P2's case manager for their preferences on how often they would like to receive itemized receipts and disbursements.

Statute Violated: Minnesota Statutes, section 245D.06, subdivision 4, paragraph (a).

4. Violation: For one person whose record was reviewed (P1), the license holder did not meet the requirements for ongoing service plan review and evaluation for an intensive service as required.

For P2, who receives an intensive service, the license holder failed to discuss the following with P2's support team and maintain documentation of the discussion at least once per year:

- how technology might be used to meet the person's desired outcomes; and
- options for transitioning out of a community setting controlled by a provider and into a setting not controlled by a provider.

Statute Violated: Minnesota Statutes, section 245D.071, subdivision 5.

5. Violation: For one person whose record was reviewed (P2), the license holder did not provide person centered planning and service delivery.

The license holder failed to use principles of person centered planning to develop outcomes and supports for P2 that P2 desired.

Statute Violated: Minnesota Statutes, section 245D.07, subdivision 1a.

Corrective Action Required

Cedric Key

Page 4

December 20, 2023

If you fail to correct the violations specified in the Correction Order within the prescribed time lines the Commissioner may impose a fine and order other licensing sanctions pursuant to Minnesota Statutes, sections 245A.06 and 245A.07.

Corrective Action will be reviewed onsite.

B. Right to Request Reconsideration

If you believe any of the citations are in error, you have the right to request that the Commissioner of Human Services reconsider the parts of the Correction Order that you believe to be in error. The request for reconsideration must be in writing and received by the Commissioner within 20 calendar days after receipt of this report. Your request for reconsideration must be sent to:

Commissioner, Department of Human Services
Office of Inspector General
Legal Counsel's Office
ATTN: Licensing Legal Unit
PO Box 64953
St. Paul, MN 55164-0953

Please note that a request for reconsideration does not stay any provisions or requirements of the Correction Order. The Commissioner's disposition of a request for reconsideration is final and not subject to appeal under Minnesota Statutes, chapter 14.

If you have any questions regarding this Correction Order, please contact me as soon as possible.

Sincerely,

Tiffany Solano, Senior HCBS Licensor
Licensing Division
Office of Inspector General
651-431-6649