

July 7, 2025

Abdullahi Bashir, Authorized Agent  
Client Residential Care Inc  
1821 University Avenue West Suite 294  
Saint Paul, MN 55104  
License Number: 1120575 (245D – HCBS)

### **CORRECTION ORDER**

Dear Abdullahi Bashir:

On June 4, 2025, a licensing review of Client Residential Care Inc, located at 1821 University Avenue West, Saint Paul, Minnesota, was conducted to determine compliance with state and federal laws and rules governing the provision of home and community-based services to persons with disabilities and age 65 and older under Minnesota Statutes, Chapter 245D. As a result of this licensing review a Correction Order is being issued.

#### **A. Reason for Correction 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.

1. Citation: Minnesota Statutes, section 245D.04, subdivision 1.

Violation: For one of two persons whose record was reviewed (P2), the license holder did not provide a written notice that identified the service recipient rights as required.

Minnesota Statutes, section 245A.02, subdivision 2b defines “annual” or “annually” to mean prior to or within the same month of the subsequent calendar year.

The license holder failed to provide P2 with a written notice that identified the service recipient’s rights and an explanation of those rights annually 2024. The license holder most recently provided P2 with the required written notice on October 16, 2023.

Corrective Action Ordered: Within 30 days of receiving this order, you must provide P2 with a written notice that identifies the service recipient rights, and an explanation of those rights. Compliance with this order will be reviewed at an upcoming compliance monitoring visit. On an ongoing basis, you must maintain compliance as required in this subdivision.

2. Citation: Minnesota Statutes, section 245D.07, subdivision 1.

Violation: For one person whose record was reviewed (P1), the license holder did not provide services according to the federal waiver plan as required.

The license holder provided night supervision to P1. The license holder employed P1's spouse as a staff to provide night supervision to P1. According to the Community-Based Service Manual (CBSM), spouses cannot be paid to provide waiver services. The license holder failed to provide services in compliance with the federal waiver plan.

Corrective Action Ordered: Immediately upon receiving this order, the license holder must remove P1's spouse as a staff providing night supervision. On an ongoing basis, you must maintain compliance as required in this subdivision.

3. Citation: Minnesota Statutes, section 245D.07, subdivision 2, paragraph (c).

Violation: For one person whose record was reviewed (P1), the license holder did not complete service planning for basic support services as required.

The license holder provided individualized home supports and night supervision to P1. The license holder failed to identify how night supervision would be provided in P1's support plan addendum, including how, when and by whom services would be provided, and the person responsible for overseeing the delivery and coordination of services for night supervision.

Corrective Action Ordered: Within 30 days of receiving this order, you must review and revise P1's preliminary support plan addendum to document the information detailed above. Additionally, you must provide orientation on the updates to P1's support plan addendum to all staff that provide direct support to P1. Compliance with this order will be reviewed at an upcoming compliance monitoring visit. On an ongoing basis, you must maintain compliance as required in this subdivision.

4. Citation: Minnesota Rules, part 9544.0030, subpart 1.

Violation: For two persons whose records were reviewed (P1 and P2), the license holder did not incorporate positive support strategies as required.

The license holder failed to incorporate positive support strategies in writing into P1's and P2's existing treatment service, or other individual plan.

Corrective Action Ordered: Immediately, you must incorporate positive support strategies into P1's and P2's existing support plan addendum. Additionally, the positive support strategies must be evaluated at least every six months with P1 and P2 to determine whether changes are needed, and if so, make appropriate changes. You must provide orientation on the updates to P1's and P2's support plan addendum to all staff that provide direct support to P1 and P2. Compliance with this order will be reviewed at an upcoming compliance monitoring visit. On an ongoing basis, you must maintain compliance as required in this subdivision.

5. Citation: Minnesota Statutes, section 245D.095, subdivision 3, paragraph (b).

Violation: For two persons whose records were reviewed (P1 and P2), the license holder did not maintain a service recipient record as required.

The license holder failed to maintain progress or daily log notes for P1 and P2 that were recorded by the program.

Corrective Action Ordered: Immediately upon receiving this order, you must begin maintaining progress or daily log notes for P1 and P2. Compliance with this order will be reviewed at an upcoming compliance monitoring visit. On an ongoing basis, you must maintain compliance as required in this subdivision.

6. Citation: Minnesota Statutes, section 245D.09, subdivision 4.

Violation: For two of two staff persons whose records were reviewed (SP1 and SP2), the license holder did not provide and ensure completion of orientation training as required.

- a. The license holder failed to provide SP1 with the following training within 60 calendar days of hire:
  - the license holder's current policies and procedures required under Minnesota Statutes, chapter 245D, including their location and access, and staff responsibilities related to implementation of those policies and procedures, including:
    - service termination policy;
    - service suspension policy; and
    - prohibition on drug and alcohol use policy;
  - the safe and correct use of manual restraint on an emergency basis according to the requirements in section 245D.061 or successor provision, and what constitutes the use of restraints, time out, and seclusion, including chemical restraint;
  - staff responsibilities related to prohibited procedure under section 245D.06, subdivision 5, or successor provisions, why such procedures are not effective for reducing or elimination symptoms or undesired behavior, and why such procedures are not safe; and
  - basic first aid.
- b. The license holder failed to provide SP2 with the following training within 60 calendar days of hire:
  - the license holder's current policies and procedures required under Minnesota Statutes, chapter 245D, including their location and access, and staff responsibilities related to implementation of those policies and procedures, including:
    - consumer grievance and complaint procedures;
    - service termination policy
    - service suspension policy;
    - prohibition on drug and alcohol use policy; and
    - emergency use of manual restraint;
  - the service recipient rights and staff responsibilities related to ensuring the exercise and protection of those rights according to the requirements in Minnesota Statutes, section 245D.04;

- sections 245D.65 and 626.557 governing maltreatment reporting and service planning for vulnerable adults, and staff responsibilities related to protecting persons from maltreatment and reporting maltreatment; and
- the principles of person-centered service planning and delivery as identified in Minnesota Statutes, section 245D.07, subdivision 1a, and how they applied to direct support service provided by the staff person.

Corrective Action Ordered: Within 30 days of receiving this order, you must provide SP1 and SP2 the training detailed above. Additionally, you must document this training in SP1's and SP2's personnel record according to Minnesota Statutes, section 245D.095, subdivision 5. Compliance with this order will be reviewed at an upcoming compliance monitoring visit. On an ongoing basis, you must maintain compliance as required in this subdivision.

7. Citation: Minnesota Statutes, section 245D.09, subdivision 4a.

Violation: For two staff persons whose records were reviewed (SP1 and SP2), the license holder did not provide orientation to individual service recipient needs as required.

The license holder failed to provide the following orientation to SP1 and SP2 before having unsupervised direct contact with a person served by the program:

- the person's support plan or support plan addendum as it related to the responsibilities assigned to the license holder; and
- the person's individual abuse prevention plan, to achieve and demonstrate an understanding of the person as a unique individual, and how to implement those plans.

Corrective Action Ordered: Within 30 days of receipt of this order, you must provide the orientation listed above to SP1 and SP2 for each service recipient that SP1 and SP2 provide direct support services to. Compliance with this order will be reviewed at an upcoming compliance monitoring visit. On an ongoing basis, you must maintain compliance as required in this subdivision.

8. Citation: Minnesota Statutes, section 245D.095, subdivision 5.

Violation: For one staff person whose record was reviewed (SP1), the license holder did not maintain personnel records as required.

The license holder failed to maintain a personnel record for SP1 that included the date each training was completed.

Corrective Action Ordered: On an ongoing basis, you must maintain compliance as required in this subdivision.

9. Citation: Minnesota Statutes, section 245D.09, subdivision 5.

Violation: For one staff person whose record was reviewed (SP2), the license holder failed to provide annual training as required.

The license holder failed to provide SP2 training on the following topics annually in 2025:

- data privacy requirements according to Minnesota Statutes, sections 13.01 to 13.10 and 13.46, the federal Health Insurance Portability and Accountability Act of 1996 (HIPPA), and staff responsibilities related to complying with data privacy practices;
- the service recipient rights and staff responsibilities related to ensuring the exercise and protection of those rights according to the requirements in Minnesota Statutes, section 245D.04;
- sections 245A.65, and 626.557 and chapter 260E, governing maltreatment reporting and service planning for children and vulnerable adults, and staff responsibilities related to protecting persons from maltreatment and reporting maltreatment, including annual review to VA maltreatment reporting;
- the principles of person-centered service planning and delivery as identified in Minnesota Statutes, section 245D.07, subdivision 1a, and how they applied to direct support service provide by the staff person;
- the safe and correct use of manual restraint on an emergency basis according to the requirements in section 245D.061 and what constitutes the use of restraints, time out, and seclusion, including chemical restraint;
- staff responsibilities related to prohibited procedures under section 245D.06, subdivision 5, why such procedures are not effective for reducing or eliminating symptoms or undesired behavior, and why such procedures are not safe;
- basic first aid; and
- strategies to minimize the risk of sexual violence, including concepts of healthy relationships, consent, and bodily autonomy of people with disabilities.

The license holder most recently provided SP2 this training in January, 2024.

Corrective Action Ordered: Within 30 days of receiving this order, you must provide SP2 training on the topics detailed above. Additionally, you must document this training in SP2's personnel record according to Minnesota Statutes, section 245D.095, subdivision 5. Compliance with this order will be reviewed at an upcoming compliance monitoring visit. On an ongoing basis, you must maintain compliance as required in this subdivision.

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

#### **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  
Attention: Licensing Legal Unit  
PO Box 64953  
St. Paul, MN 55164-0953

Abdullahi Bashir

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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.

Robert Romani, HCBS Licenser  
Licensing Division  
Office of Inspector General  
651-431-3658