



October 16, 2025

Richard Joslin
Bright Path LLC
8649 Sandro Road
Minneapolis, MN 55438

RE: Report No. 202507778
BrightPath LLC/ BrightPath LLC
License No. 1118740/1097629

Dear Richard Joslin:

CORRECTION ORDER

An investigation of Bright Path LLC/BrightPath LLC was completed regarding report number 202507778 which alleged violation of Minnesota Statutes, section 626.557, and Minnesota Statutes, Chapter 245D. This maltreatment allegation concerned physical abuse. The disposition of the investigation report is inconclusive. Six violations were noted.

VIOLATIONS AND CORRECTION ORDERS

The following violations of state and (or) federal laws and rules were observed. Corrective action for each violation is required by Minnesota Statutes, section 245A.06, and is hereby ordered by the Commissioner of Human Services. Failure to correct the violations within the prescribed amount of time may result in fines and/or action against your license, as provided for in Minnesota Statutes, sections 245A.06 and 245A.07.

1. Citation: Minnesota Statutes, section 245A.04, subdivision 14, paragraph (b), clause (3).

Violation: The license holder failed to monitor implementation of policies and procedures by staff persons.

On August 15, 2025, a staff person's (P1's) interactions with a consumer (C), as described below in violations #4 and #5, were not in accordance with the facility's *Rights of Persons Served* policy, *Personal Electronics Policy*, *Data Privacy* policy, and *Emergency Use of Manual Restraints* policy.

Corrective Action Ordered: Within 45 days of receiving this order you must provide training to P1 on facility policies and maintain compliance on an ongoing basis.

2. Citation: Minnesota Statutes, section 245D.11, subdivision 3.

Violation: The license holder failed to ensure staff persons followed policies and procedures protecting clients' data privacy rights.

On August 15, 2025, P1 video recorded an interaction with the C on P1's personal cell phone.

Corrective Action Ordered: Within 45 days of receiving this order you must provide training to P1 on protecting clients' data privacy rights and maintain compliance on an ongoing basis.

3. Citation: Minnesota Statutes, section 245D.09, subdivision 4a, paragraph (c).

Violation: The license holder failed to ensure that staff persons reviewed and received instruction on the client's coordinated service and support plan or coordinated service and support plan addendum as it relates to the responsibilities assigned to the license holder to achieve and demonstrate an understanding of the person as a unique individual, and how to implement those plans.

There was no documentation to show that a staff person (P2) received training on the C's most recent program plans.

Corrective Action Ordered: Correct immediately and on an ongoing basis, you must maintain compliance with this licensing requirement.

4. Citation: Minnesota Statutes, section 245D.07, subdivision 1a, paragraph (a).

Violation: The license holder failed to provide services in response to a client's identified needs, interests, preferences, and desired outcomes as specific in his/her support plans.

The C's *Support Plan Addendum Intensive Services* stated that if aggression occurred, staff persons encouraged the C to walk away from situations, and to practice coping skills such as deep breathing, puzzling, coloring, or listening to music. Staff persons also offered "space" in heightened situations. If staff persons were concerned about the C or other persons in "imminent risk of harm" they called 9-1-1.

On August 15, 2025, after the C was "verbally aggressive" and "having behaviors," the C said s/he was going to his/her bedroom and did so. P1 followed the C to his/her bedroom, video recorded the C on his/her personal cell phone which resulted in the C's escalating and precipitated an interaction where P1 pulled the C's hair.

Corrective Action Ordered: Within 45 days of receiving this order you must provide training to P1 on the C's *Support Plan and Support Plan Addendum* and maintain compliance on an ongoing basis.

5. Citation: Minnesota Statutes, section 245D.04, subdivision 3, paragraph (a), clause (6).

Violation: The license holder failed to protect a client's protection related rights included being treated with courtesy and respect.

On August 15, 2025, after a consumer (C) was "verbally aggressive" and "having behaviors," the C said s/he was going to his/her bedroom and did so. P1 followed the C to his/her bedroom, video recorded the C on his/her personal cell phone which resulted in the C's escalating and precipitated an interaction where P1 pulled the C's hair.

Corrective Action Ordered: Within 45 days of receiving this order you must provide training to P1 on clients' protection related rights and maintain compliance on an ongoing basis.

6. Citation: Minnesota Statute, section 626.557, subdivision 3, paragraph (a).

Violation: A mandated reporter who has reason to believe that a vulnerable adult was being or has been maltreated shall immediately report the information to the Minnesota Adult Abuse Reporting Center.

On August 15, 2025, multiple staff persons at various levels of authority were aware of an incident of alleged maltreatment but a report was not received by the Minnesota Adult Abuse Reporting Center until August 26, 2025.

Corrective action ordered: Correct immediately and on an ongoing basis, you must maintain compliance with this licensing requirement.

If you believe any of the citations are in error, you may ask the Commissioner of Human Services to reconsider the parts of the correction order that you believe to be in error. If you choose to exercise this right, your request for reconsideration must be in writing and received by the Commissioner within 20 calendar days after receipt of this letter. Your request for reconsideration must be sent to:

Commissioner
Minnesota Department of Human Services
c/o Licensing Division
PO Box 64242
St. Paul, MN 55164-0242

You must include any and all information, documentation, or other evidence you have to support your request for reconsideration. Please note that a request for reconsideration does not stay any provisions of the correction order.

Richard Joslin
Page 4
October 16, 2025

If you have any questions regarding the investigation, contact me immediately at anna.parkin@state.mn.us or at 651-431-6225. If you have any questions regarding compliance with this Correction Order or applicable rules, contact your licensor, Jenna Johnson at jenna.m.johnson1@state.mn.us or at 651-431-2804.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Parkin', with a stylized flourish at the end.

Anna Parkin, Investigator
Office of Inspector General
Licensing Division

Enclosure