



December 5, 2025

Peter Gbala, Authorized Agent  
Caring LLC  
151 Summer Avenue  
Saint Paul, Minnesota 55117

License Number: 1098535 (245D – HCBS)

### **CORRECTION ORDER**

Dear Peter Gbala:

On October 27, 2025, a licensing review of Caring LLC, located at 151 Summer Avenue, 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 245A.65, subdivision 2, paragraph (a).

Violation: For one of five persons whose record was reviewed (P4), the license holder did not provide an orientation to the program abuse prevention plan as required.

The license holder did not provide P4 an orientation to the program abuse prevention plan within 24 hours of admission.

Corrective Action Ordered: Within 30 days of receiving this order, you must provide P4 with an orientation to the program abuse prevention plan. On an ongoing basis, you must maintain compliance as required in this subdivision.

2. Citation: Minnesota Statutes, section 245D.071, subdivision 4.

Violation: For three persons whose records were reviewed (P2-P4), the license holder did not develop service outcomes and supports as required.

- a. The license holder did not document the supports and methods to be implemented to support P2 and accomplish outcomes, including:
  - the methods or actions that would be used to support P2 and to accomplish the service outcomes, including information about any changes or modifications to the physical and social environments necessary when the service supports are provided; and
  - the measurable and observable criteria for identifying when the desired outcome had been achieved.
- a. The license holder did not document the supports and methods to be implemented to support P3 and accomplish outcomes, including the measurable and observable criteria for identifying when the desired outcome had been achieved and how data would be collected.
- b. The license holder did not document the supports and methods to be implemented to support P4 and accomplish outcomes, including the measurable and observable criteria for identifying when the desired outcome had been achieved.

Corrective Action Ordered: Within 30 days of receiving this order, you must develop service plans for P2-P4 that document the service outcomes and supports, including the information detailed above. On an ongoing basis, you must maintain compliance as required in this subdivision.

3. Citation: Minnesota Statutes, section 245D.071, subdivision 5, paragraph (b).

Violation: For one person whose record was reviewed (P4), the license holder did not complete service plan review and evaluation as required.

The license holder did not, in coordination with P4's support team or expanded support team, meet with P4, P4's case manager and other people identified by P4 at least once per year to discuss how technology might be used to meet the person's desired outcomes.

Corrective Action Ordered: Within 30 days of receiving this order, you must meet with P4, P4's case manager and other people identified by P4 to discuss how technology might be used to meet P4's outcomes. You must document a summary of this discussion in P4's support plan addendum that includes:

- a statement regarding any decision made related to the use of technology; and

- a description of any further research that must be completed before a decision regarding the use of technology can be made.

On an ongoing basis, you must maintain compliance as required in this subdivision.

4. Citation: Minnesota Statutes, section 245D.05, subdivision 1, paragraph (b).

Violation: For one person whose record was reviewed (P4), the license holder did not maintain documentation on how health needs would be met as required.

The license holder was assigned the responsibility of meeting P4's health needs in P4's support plan addendum. The license holder did not maintain documentation on how P4's health needs would be met, including a description of the procedures the license holder would follow in order to provide medication assistance and assist with or coordinate medical, dental, and other health service appointments.

Corrective Action Ordered: Within 30 days of receiving this order, you must maintain documentation in P4's support plan addendum on how P4's health needs will be met, including the information detailed above. On an ongoing basis, you must maintain compliance as required in this subdivision.

5. Citation: Minnesota Rules, section 9544.0030, subpart 1.

Violation: For one person whose record was reviewed (P1), the license holder did not evaluate positive support strategies as required.

The license holder did not evaluate P1's identified positive support strategies with P1 at least every six months. The license holder was evaluating P1's identified positive support strategies with P1 annually.

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

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

Violation: For two of six staff persons whose records were reviewed (SP1 and SP4), the license holder did not provide annual training 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.

- a. The license holder did not provide SP1 with annual training on the following topics annually in 2025:

- data privacy requirements according to sections 13.01 to 13.10 and 13.46, the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA), 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 section 245D.04;
- sections 245A.65, 245A.66, 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. This orientation must be provided within 72 hours of first providing direct contact services and annually thereafter according to section 245A.65, subdivision 3;
- the principles of person-centered service planning and delivery as identified in section 245D.07, subdivision 1a, and how they apply to direct support service provided by the staff person;
- the safe and correct use of manual restraint on an emergency basis according to the requirements in section 245D.061 or successor provisions, 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, or successor provisions, 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 provided these trainings to SP1 in September 2024 and in October 2025.

- b. The license holder did not provide SP4 with annual training in 2025 on basic first aid. The license holder most recently provided SP4 training on basic first aid in August, 2024.

Corrective Action Ordered: Within 30 days of receiving this order, you must provide SP4 training on basic first aid. On an ongoing basis, you must maintain compliance as required in this subdivision.

7. Citation: Minnesota Statutes, section 245D.095, subdivision 5, paragraph (a).

Violation: For two staff persons whose records were reviewed (SP1 and SP3), the license holder did not maintain personnel records as required.

The license holder did not maintain accurate documentation of SP1's and SP3's orientation, including the number of hours per subject area.

Corrective Action Ordered: 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  
ATTN: Legal Unit  
Licensing Division  
PO Box 64242  
St. Paul, MN 55164-0242

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.

Tammi Mitei, HCBS Human Services Licensur  
Licensing Division  
Office of Inspector General  
651-431-6341