

March 11, 2026

CERTIFIED MAIL

Abdi Ali, Authorized Agent
Aaron Care Inc
4020 Minnehaha Avenue, #1065
Minneapolis, Minnesota 55406-4600

License Number: 1106148 (245D – HCBS)

ORDER OF CONDITIONAL LICENSE

Dear Abdi Ali:

The Department of Human Services (DHS) is placing Aaron Care Inc's license to provide Home and Community-Based Services (HCBS) on conditional status for two years, beginning March 11, 2026. This means you must meet certain conditions to maintain your license, detailed below. This order applies to all services licensed under Chapter 245D and the service sites detailed in the "Applicability of Conditional License" section below. This order is based on your noncompliance with Home and Community-Based Services licensing requirements. Details of our findings are also provided below. Our next steps and your options are also detailed.

REASON FOR THE CONDITIONAL LICENSE

On November 25, 2025, DHS licensors conducted a licensing review at your facility located at 4020 Minnehaha Avenue, Minneapolis, Minnesota. As a result of this licensing visit, the DHS licensors determined that your program failed to comply with the laws and rules that apply to licensed Home and Community-Based Services, citing 16 violations.

Licensing Violations

DHS determined that your program failed to follow licensing rules and statutes, as described below.

Program Coordination, Evaluation, and Oversight Violation

1. **Violation:** The license holder did not ensure program management and oversight occurred as required.
 - a. The license holder designated SP4 as the individual responsible for the coordination and evaluation of services provided by the license holder. The license holder did not ensure that SP4 provided supervision, support, and evaluation of activities including:

- oversight of the license holder's responsibilities assigned in the persons support plan and support plan addendum;
- taking the action necessary to facilitate the accomplishment of the outcomes according to the requirements in section 245D.07; and
- evaluation of the effectiveness of service delivery, methodologies, and progress on the persons outcomes based on the measurable and observable criteria for identifying when the desired outcome had been achieved according to the requirements in section 245D.07.

Additionally, the license holder did not ensure that SP4 had the skills and abilities necessary to develop effective plans and to design and use data systems to measure effectiveness of services and supports.

- b. The license holder designated SP3 as the managerial staff person responsible to provide program management and oversight of the services provided. The license holder did not ensure that SP3 had a minimum of three years of supervisory level experience in a program that provided care or education to vulnerable adults or children and minimally met the education and training requirements including:
- a baccalaureate degree in a field related to human services, education, or health, and one year of full-time work experience providing direct care services to persons with disabilities or persons age 65 and older, or equivalent work experience providing care or education to children; or
 - an associate degree in a field related to human services, education, or health, and two years of full-time work experience providing direct care services to persons with disabilities or persons age 65 and older, or equivalent work experience providing care or education to vulnerable adults or children; or
 - a diploma in a field related to human services, education, or health from an accredited postsecondary institution and three years of full-time work experience providing direct care services to persons with disabilities or persons age 65 and older or equivalent work experience providing care or education to vulnerable adults or children; or
 - minimum of 50 hours of education and training related to human services and disabilities; and
 - four years of full-time work experience providing direct care services to persons with disabilities or persons age 65 and older under the supervision of a staff person who meets the qualifications identified in clauses (1) and (3).

Statute Violated: Minnesota Statutes, section 245D.081, subdivision 2 and 3.

Corrective Action Required: Within 30 days of receiving this order, you must:

- designate a staff person other than SP4 to be responsible for the coordination and evaluation of individual service delivery and ensure that individual meets the education, training and work experience requirements outlined in 245D.081, subdivision 2;

- designate a managerial staff person other than SP3 to be responsible for the program coordination, evaluation, and oversight of services provided and ensure that individual meets the education, training, and work experience requirements outlined in 245D.081, subdivision 3; and
- submit the individuals name and credentials to your licensor for approval. The same person may perform both functions if the education, training and work experience requirements outlined in section 245D.081, subdivisions 2 and 3 are met.

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

Service Recipient Violations

2. Violation: For one of six persons whose records were reviewed (P4), the license holder did not provide an orientation to reporting procedures for suspected or alleged maltreatment as required.

The license holder did not provide P4 with an orientation to the internal and external reporting procedures related to suspected or alleged maltreatment within 24 hours of admission. The license holder initiated services with P4 on October 1, 2025. At the time of the review, the license holder had not provided P4 with this orientation.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245A.65, subdivision 1, paragraph (c).

Corrective Action Required: Within 60 days of receiving this order, you must provide P4 with an orientation to the internal and external reporting procedures related to suspected or alleged maltreatment. Documentation of this orientation being provided to P4 must be maintained in the service recipient record. On an ongoing basis, you must maintain compliance as required in this subdivision.

3. Violation: For two persons whose records were reviewed (P2 and P4), the license holder did not establish and enforce a program abuse prevention plan (PAPP) as required.

The license holder did not establish a PAPP for the Integrated Community Supports (ICS) location that included:

- an assessment of the population including an evaluation of age, gender, mental functioning, physical and emotional health or behavior of the client, the need for specialized programs of care for clients, the need for training of staff to meet identified individual needs, and the knowledge a license holder may regarding previous abuse that is relevant to minimizing risk of abuse for clients;
- an assessment of the physical plant where the licensed services were provided including an evaluation of the condition and design of the building as it relates to the

safety of clients and the existence of areas in the building which are difficult to supervise; and

- an assessment of the environment including the location of the program in a particular neighborhood or community, the type of grounds and terrain surrounding the building, the type of internal programming, and the programs staffing patterns.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245A.65, subdivision 2, paragraph (a)

Corrective Action Required: Within 60 days of receiving this order, you must:

- establish a PAPP that includes all the above-mentioned areas for each facility or each site where living arrangements are provided by the agency;
- post the PAPP in a prominent location in the program;
- provide an orientation to the PAPP for all service recipients living at the location as required;
- maintain documentation of service recipients' orientation to the PAPP in the service recipient record as required;
- provide all staff an orientation to the PAPP as required; and
- maintain documentation of staff orientation to the PAPP in the personnel record as required.

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

4. **Violation:** For two persons whose records were reviewed (P3 and P4), the license holder did not develop an individual abuse prevention plan (IAPP) as required.

- a. The license holder did not develop an IAPP for P3 that included:

- an individualized assessment of P3's susceptibility to abuse by other individuals, including other vulnerable adults and P3's risk of abusing other vulnerable adults;
- a statement of the specific measures to be taken to minimize the risk of abuse to P3 and other vulnerable adults; and
- the specific actions the program would take to minimize the risk of abuse within the scope of licensed services.

The license holder maintained an IAPP for P3 that did not include an assessment of P3's susceptibility to physical abuse, self-abuse, and financial exploitation.

- b. The license holder did not develop an IAPP for P4 as part of the initial individual service plan. The license holder initiated services for P4 on October 1, 2025. At the time of the review, an IAPP had not been developed for P4.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245A.65, subdivision 2, paragraph (b).

Corrective Action Required: Within 60 days of receiving this order, you must:

- complete an individualized assessment of P3's susceptibility to physical abuse, self-abuse, and financial exploitation and develop an IAPP that includes the specific actions the program will take to reduce the risk of abuse within the scope of services;
- review the updated IAPP with P3, P3's legal representative, and P3's case manager and maintain documentation of this review in the service recipient record;
- complete an individualized assessment of P4's susceptibility to abuse by other individuals, including other vulnerable adults, P4's risk of abusing other vulnerable adults and include statements of the specific measures to be taken to minimize the risk of abuse to P4 and other vulnerable adults and the specific action you will take to minimize the risk of abuse within the scope of licensed services;
- review the IAPP with P4 and P4's case manager and maintain documentation of this review in the service recipient record; and
- provide training to all staff that work with P3 and P4 on the IAPPs and maintain documentation of this training in the personnel record including the date the training is completed, the number of hours per subject area, and the name of the trainer or instructor.

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

5. Violation: For one person whose record was reviewed (P4), the license holder did not provide a written notice identifying the service recipients' rights as required.

The license holder did not provide P4 with a written notice that identified the service recipient rights in subdivisions 2 and 3, and an explanation of those rights within five working days of service initiation. The license holder initiated services with P4 on October 1, 2025. At the time of the review, the license holder had not provided P4 with a written notice of service recipient rights and an explanation of those rights.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245D.04, subdivision 1

Corrective Action Required: Within 60 days of receiving this order, you must provide P4 with a written notice of the service recipient rights and an explanation of those rights. Documentation of P4 receiving the service recipient rights must be maintained in the service recipient record. On an ongoing basis, you must maintain compliance as required in this subdivision.

6. Violation: For one person whose record was reviewed (P3), the license holder did not provide services in accordance with the federal waiver plan as required.

According to the Community Based Services Manual (CBSM), respite services are short-term care services provided to a person when the primary caregiver is absent or needs relief.

The license holder did not follow the requirements in the CBSM when they allowed a primary caregiver of P3 to provide respite services.

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

Corrective Action Required: Immediately upon receiving this order, you must adhere to the requirements in the CBSM related to primary caregivers providing respite services. On an ongoing basis, you must maintain compliance as required in this subdivision.

7. Violation: For one person whose record was reviewed (P4), the license holder did not complete initial intensive service planning as required.
 - a. The license holder did not complete a preliminary support plan addendum for P4 based on the support plan within 15 days of service initiation. The license holder initiated services for P4 on October 1, 2025. At the time of the review, the license holder had not completed a preliminary support plan addendum.
 - b. The license holder did not complete assessments of P4 in the following areas within 45 days of service:
 - P4's ability to self-manage health and medical needs to maintain or improve physical, mental, and emotional well-being, including, when applicable, allergies, seizures, choking, special dietary needs, chronic medical conditions, self-administration of medication or treatment orders, preventative screening, and medical and dental appointments;
 - P4's ability to self-manage personal safety to avoid injury or accident in the service setting, including, when applicable, risk of falling, mobility, regulating water temperature, community survival skills, water safety skills, and sensory disabilities; and
 - P4's ability to self-manage symptoms or behavior that may otherwise result in an incident as defined in section 245D.02, subdivision 11, clauses (4) to (7), suspension or termination of services by the license holder, or other symptoms or behaviors that may jeopardize the health and welfare of P4 or others.

The license holder initiated services for P4 on October 1, 2025. At the time of the review, the license holder had not conducted the required assessments.
 - c. The license holder did not hold an initial planning meeting with P4, P4's case manager and other members of the support team or expanded support team before providing 45 days of service to determine the following information:
 - the scope of the services to be provided to support P4's daily needs and activities;
 - P4's desired outcomes and the supports necessary to accomplish P4's desired outcomes;
 - P4's preferences for how services and supports are provided, including how the provider would support P4 to have control of their schedule;

- whether the current service setting is the most integrated setting available and appropriate for P4;
- opportunities to develop and maintain essential and life-enriching skills, abilities, strengths, interests, and preferences;
- opportunities for community access, participation, and inclusion in preferred community activities;
- opportunities to develop and strengthen personal relationships with other persons of P4's choice in the community;
- opportunities to seek competitive employment and work at competitively paying jobs in the community;
- how services must be coordinated across other providers licensed under this chapter serving the person and members of the support team or expanded support team to ensure continuity of care and coordination of services for P4; and
- a discussion of how technology might be used to meet P4's desired outcomes.

The license holder initiated services for P4 on October 1, 2025. At the time of the review, the initial planning meeting and the information outlined above had not been determined.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245D.071, subdivision 3.

Corrective Action Required: Within 60 days of receiving this order, you must:

- complete assessments of P4 in the areas outlined above in (b);
- meet with P4 and P4's case manager to determine the areas in (c); and
- provide training to all staff that work with P4 on the updated information and maintain documentation of the training, including the date the training is completed, the number of hours per subject area, and the name of the trainer or instructor.

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

8. **Violation:** For two persons whose records were reviewed (P2 and P4), the license holder did not develop service outcomes and supports as required.
 - a. The license holder did not implement the service outcome supports and methods identified for P2 when they did not collect data on P2's outcome. The license holder documented in P2's support plan addendum that the data for P2's outcome would be collected and documented in the following ways:
 - team members will document daily observations in the MAR/charting system to specify if each task was prompted, assisted, or accomplished independently;
 - the designated coordinator will examine the information on a weekly basis; and
 - monthly summary reports will be generated to assess programs.

The license holder did not collect the data, did not examine the information, and did not provide monthly summary reports related to P2's desired outcome.

- b. The license holder did not develop and document the supports and methods to be implemented to support P4 and accomplish outcomes related to acquiring, retaining, or improving skills and physical, mental, and emotional health and well-being including:
 - the methods or actions that would be used to support P4 and to accomplish service outcomes, including information about:
 - any changes or modifications to the physical and social environments necessary when the service supports are provided;
 - any equipment and materials required; and
 - techniques that were consistent with P4's communication mode and learning style;
 - the measurable and observable criteria for identifying when the desired outcome had been achieved and how data would be collected;
 - the projected starting date for implementing the supports and methods, and the date by which progress towards accomplishing the outcomes would be reviewed and evaluated; and
 - the names of the staff or position responsible for implementing the supports and methods.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245D.071, subdivision 4

Corrective Action Required: Within 60 days of service initiation, you must:

- develop, document, and implement a corrective action plan for ensuring data on P2's outcome is collected, examined and reported as assigned in the support plan addendum;
- develop and document the supports and methods outlined above for P4;
- submit the support plan addendum to P4 and P4's case manager to obtain dated signatures and document completion and approval of the support plan addendum; and
- provide training to all staff that work with P4 on the outcomes, supports, and methods to be implemented to support P4. Documentation of this training must be maintained in the personnel record including the date the training is completed, the number of hours per subject area, and the name of the trainer or instructor.

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

9. **Violation:** For two persons whose records were reviewed (P1 and P2), the license holder did not complete intensive service plan review and evaluation as required.

- a. The license holder did not provide P1's case manager with an opportunity to participate in the service plan review meeting following the stated timelines in P1's support plan and support plan addendum. Additionally, the license holder did not send P1's support plan addendum to P1's case manager within ten working days of the progress review meeting held on September 1, 2025. The license holder provided P1's case manager with the support plan addendum on November 25, 2025.
- b. The license holder did not provide P2's case manager with an opportunity to participate in the service plan review meeting following the stated timelines in P2's support plan and support plan addendum. Additionally, the license holder did not send P2's support plan addendum to P2's case manager within ten working days of the progress review meeting held on September 1, 2025. At the time of the review, P2's case manager had not been provided with the updated support plan addendum.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

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

Corrective Action Required: Within 60 days of receiving this order, you must provide P2's support plan addendum to P2's case manager for review and approval. Documentation of P2's case manager receiving the updated support plan addendum must be maintained in the service recipient record. On an ongoing basis, you must maintain compliance as required in this subdivision.

10. **Violation:** The license holder did not maintain an admission or discharge record as required.

The license holder did not maintain a written or electronic register, listing in chronological order the dates and names of all persons served by the program who have been admitted, discharged, or transferred, including service terminations initiated by the license holder and deaths. The license holder provided an admission and discharge register to DHS licensors; however, the dates of service initiation for individuals on the admission and discharge register did not match the information maintained in the service recipient records. Additionally, DHS licensors found records for individuals served that were not on the admission and discharge register.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245D.095, subdivision 2.

11. **Violation:** For two persons whose records were reviewed (P2 and P4), the license holder did not maintain a service recipient record as required.

- a. The license holder did not maintain progress or daily log notes for the services provided to P2. The license holder initiated services for P2 in March 2022 and was unable to provide progress or daily log notes to DHS licensors to document services provided to P2.
- b. The license holder did not maintain progress or daily log notes for the services provided to P4 from October 1, 2025, through October 29, 2025, and November 13, 2025, through November 24, 2025.

Repeat Violation: In a Correction Order that DHS issued on April 1, 2025, and on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245D.095, subdivision 3.

12. **Violation:** For two persons whose records were reviewed (P2 and P4) the license holder did not make available policies and procedures as required.

The license holder did not inform and provide copies of the policies and procedures affecting P2's and P4's rights to P4, P2's case manager, and P4's case manager within five working days of service initiation including:

- grievance policy and procedure;
- service suspension and termination policy and procedure;
- emergency use of manual restraints policy and procedure; and
- data privacy requirements.

The license holder initiated services for P4 on October 1, 2025. At the time of the review, P4 and P4's case manager had not been informed of or received copies of the above policies. In a Correction Order issued by DHS on June 11, 2025, the license holder was ordered to provide P2's case manager with copies of the policies and procedures listed above within 30 days of receiving the order. At the time of the review, this had not been completed.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Statute Violated: Minnesota Statutes, section 245D.10, subdivision 4.

Corrective Action Required: Within 60 days of receiving this order, you must:

- provide P4, P2's case manager and P4's case manager with copies of the policies and procedures affecting P2's and P4's rights; and
- maintain documentation of P4's, P2's case manager and P4's case managers receipt of the policies and procedures in the service recipient record.

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

13. Violation: For one person whose record was reviewed (P2), the license holder did not review and evaluate the positive support strategies as required.

The license holder did not review and evaluate with P2 the positive support strategies to be used when providing services to P2 every six months. The license holder initiated services for P2 in March 2022. At the time of the review, there was no documented review of the positive support strategies for P2.

Repeat Violation: In a Correction Order that DHS issued on June 11, 2025, you were previously found in violation of this same statute.

Rule Violated: Minnesota Rules, part 9544.0030, subpart 1

Corrective Action Required: Within 60 days of receiving this order, you must review with P2 the positive support strategies to be used when providing services to P2 to determine whether changes are needed, and if so, make appropriate changes. On an ongoing basis, you must maintain compliance as required in this subdivision.

14. Violation: For one person whose record was reviewed (P4), the license holder did not obtain written acknowledgement of the emergency use of manual restraint policy as required.

The license holder did not provide notice to P4 at the time of service initiation of the license holder's policy regarding the use of emergency manual restraint and obtain written acknowledgement from P4 that they had been notified. The license holder initiated services for P4 on October 1, 2025. At the time of the review, the license holder had not notified P4 of the policy regarding the emergency use of manual restraint.

Rule Violated: Minnesota Rules, part 9544.0080, subpart 1.

Corrective Action Required: Within 60 days of receiving this order, you must provide P4 with notice of the policy on the use of emergency manual restraint and obtain written acknowledgement from P4 that they have received this notice. Documentation of P4 receiving this notification must be maintained in the service recipient record. On an ongoing basis, you must maintain compliance as required in this subdivision.

Staffing Standards Violations

15. Violation: For one of four staff persons whose record was reviewed (SP2), the license holder did not provide orientation training as required.

The license holder did not provide SP2 with the following training within 60 days of hire:

- a job description and how to complete specific job functions including:
 - responding to and reporting incidents as required in Minnesota Statutes, section 245D.06, subdivision 2;

- o following safety practices established by the license holder and as required in section 245D.06, subdivision 2.

Statute Violated: Minnesota Statutes, section 245D.09, subdivision 4.

Corrective Action Required: Within 60 days of receiving this order, you must provide SP2 with the training listed above. Documentation of this training must be maintained in the personnel record including the date the training is completed, the number of hours per subject area, and the name of the trainer or instructor. On an ongoing basis, you must maintain compliance as required in this subdivision.

Nature, chronicity, or severity of violations and effect of violation(s) on health, safety, or rights of persons served by the program

The Commissioner has considered the nature, chronicity, and severity of the violations of law or rule and the effect of the violation on the health, safety or rights of persons served by the program. Based on this analysis, the Commissioner has determined that a conditional license is appropriate.

- **Nature:** The license holder was issued a correction order on April 1, 2025, and on June 11, 2025. The correction order issued by DHS on June 11, 2025, contained 15 citations with corrections ordered to be completed. While the license holder completed some of the corrections, the license holder did not implement program changes to prevent the re-occurrence of the health and safety concerns identified.
- **Chronicity:** Your program received its license on October 26, 2020. Since that time, your program has demonstrated a history of noncompliance with licensing rules and statutes. The information below summarizes this history:
 - o March 11, 2026 Conditional License (this order): 15 violations (11 repeat)
 - o June 11, 2025, Correction Order: 15 violations
 - o April 1, 2025, Correction Order: 2 violations
- **Severity:** Many of the violations involve your inability to complete initial service planning requirements, conduct ongoing evaluation of the services provided, and develop abuse prevention plans. You did not hold initial service planning meetings and ongoing evaluation meetings with individuals served, legal representatives, and case managers. Insufficient completion of service planning requirements and ongoing evaluation of services provided to persons served could result in service recipients not receiving accurate, safe, adequate, and compliant services from appropriately trained staff. You provide Integrated Community Supports (ICS) services to multiple individuals. You have been unable to develop and document a program abuse prevention plan (PAPP) that meets the requirements in 245A.65, subdivision 2, paragraph (a). A program abuse prevention plan is essential when providing services in a provider-controlled setting to ensure persons served and staff are aware of all potential safety concerns in the physical plant and environment where services are delivered. You did not meet the

responsibilities related to individual abuse prevention plans (IAPP) by not completing the IAPP as required. In addition, you did not complete the IAPP accurately by not documenting vulnerabilities of the persons served in your program. These violations relate to the health, safety, and well-being of persons served and put their health and safety at risk.

You did not prepare outcomes and supports based on assessments of the person's needs. Because the person's level of need required intensive support services, you were required to do more than supervise them and assess their needs and to document supports and methods to assist the person in acquiring, retaining or improving skills. You did not have any documentation showing how you would address the person's needs, which included measurable and observable criteria for identifying when the desired outcome has been achieved. You did not show you provided any services beyond basic support services when you were legally required and paid to provide intensive support services.

The designated coordinator did not provide the coordination of service delivery and evaluation of individual service delivery. The designated coordinator did not develop effective plans for all persons served and did not ensure staff implemented the support plan and the service outcomes in the plans that were developed. The designated manager did not provide the program management and oversight required to ensure your program remains in compliance with licensing requirements including ensuring the duties of the designated coordinator were fulfilled and ensuring corrective action was taken when ordered by the commissioner. License holders are required to hire qualified and competent individuals for this role to ensure licensing compliance is maintained. As a result of your inability to hire a qualified and competent designated coordinator and designated manager, you were found in violation of the 15 citations described in this order.

Commissioner's evaluation of program

In determining whether a licensing action is warranted, DHS evaluated the facts, conditions, and circumstances concerning your program's operation. This includes consideration of:

- the program's operation;
- well-being of persons served by your program;
- the qualifications of staff persons; and
- the ability to demonstrate competent knowledge of applicable laws and rules.

DHS is concerned about your program's operation, the well-being of persons served by your program, and your ability to demonstrate competent knowledge of applicable laws and rules. DHS is concerned about your program's operation because since you were licensed in 2020, DHS has issued 3 correction orders, and 15 licensing violations with 11 repeat violations were determined during the most recent licensing review. The number of violations and repeat violations demonstrates that you did not adequately oversee your responsibilities as a license holder, to ensure compliance, and to take corrective action when ordered by the Commissioner.

DHS' concerns about your program's operation and ability to demonstrate competent knowledge were also demonstrated in your inability to comply with service planning and evaluation requirements. These requirements protect the health and safety of persons served and are minimum standards for license holders. Inability to comply with these requirements impedes the Commissioner's ability to ensure the level of care that is required by persons served is being provided as mandated by law. Service planning and evaluation requirements are essential to keeping vulnerable adults and children safe and ensuring persons served are receiving necessary services. Your lack of service planning and documentation of evaluations posed a risk that staff would not know about the unique needs of the vulnerable people served. On multiple occasions you did not provide the case managers of persons served an opportunity to participate in service planning or evaluation meetings. Case managers are an integral part of an individual's support team as they ensure individuals are receiving the services necessary for the individual's health and safety. Your lack of communication with case managers posed a risk to persons served that they would not be able to access necessary supports and services to prevent medical emergencies, mental health emergencies or crisis situations.

Additionally, in the service plans that were available, you did not provide the services and supports that you documented would be provided to vulnerable adults and children. These service plans document the services and supports you are responsible to provide. You are responsible to ensure these services and supports are provided by your staff and to communicate with case managers if services are not able to be delivered or updates are necessary for individuals served. Your inability to ensure program management and oversight of service delivery occurred as required posed a risk that individuals would not receive the services and supports you assumed the responsibility to provide.

DHS has determined that an Order of Conditional License is appropriate based on the violations identified above and the program evaluation.

Legal Authority: Minnesota Statutes, section 245A.04, subdivision 6.

Due to the serious and chronic nature of these violations, and the conditions in the program, which impact the health and safety of persons served in your care, your license to provide home and community-based services is placed on a conditional status.

Corrective action required

You must correct the violations as described above. Compliance with this order will be reviewed onsite ongoing. If you do not demonstrate substantial compliance with home and community-based service requirements and with the terms of your conditional license that are provided below, DHS may take an additional licensing action, including revocation, against your license.

Applicability of Conditional License

This Order of Conditional License applies to all of your service sites operated under this 245D license because the 15 violations (11 repeat violations) show you lack competent knowledge of the laws required to operate an HCBS program. The violations involved your lack of competence to ensure the duties and responsibilities of the designated manager and designated coordinator were met. You did not ensure the designated coordinator was

responsible for the coordination, delivery, and evaluation of services. This led to support plans that were not adequately developed to provide services and supports to vulnerable adults and children. Additionally, the designated coordinator did not ensure that staff implemented support plans and outcomes as developed when the designated coordinator did not identify that staff were not documenting daily log notes for verification of services provided and tracking of progress on outcomes as identified in the support plan addendum. You did not ensure the designated manager met the minimum qualifications to hold the position of designated manager and that program management and oversight of services occurred as required. This led to staff providing services to individuals with no knowledge of the services to be provided and the individual needs of the service recipients. Additionally, you did not ensure the designated manager identified and implemented corrective action ordered by the commissioner in previous orders. Since the violations involved your lack of competence to hire, train competent designated coordinator and designated manager, they involve staff who provide services at any service site, persons served at multiple service sites; and they were all serious in nature, this conditional order applies to all your 245D service sites as defined in 245D.02, subdivision 32.

Legal Authority: Minnesota Statutes, section 245A.06, subdivision 1a, paragraph (a).

CONDITIONAL LICENSE TERMS

In addition to the Home and Community-Based Services licensing rules and statutes, you are required to comply with the following terms:

1. Within 15 days of receiving this order, you must notify current persons receiving services, all parties who refer persons to the program, and all payer sources of the conditional status of your license. The notification must be approved by DHS Licensing prior to being sent to persons receiving services and all other parties. Therefore, the draft notice must be submitted to DHS for approval within 10 days of receiving this order. The notification must specify the length of time of the conditional status of your license, the reasons your license was made conditional, and it must include either a copy of the Order of Conditional License or an offer to provide a copy of the order upon request.

While the license is on conditional status, you must notify new persons receiving services, referral sources, and payer sources that the license is on conditional status before they begin receiving services. The notification to new persons receiving services must specify the length of time of the conditional status of the license, the reasons the license was made conditional, and it must include either a copy of the Order of Conditional License or an offer to provide a copy of the order upon request.

Within 30 days of receiving this order, you must submit to the DHS Licensing Division a list of the individuals and parties that received the notice.

2. Immediately upon receiving this order, you must adhere to the requirements in the CBSM related to primary caregivers providing respite services as indicated above in citation five.
3. Within 30 days of receiving this order, you must:
 - designate a staff person, other than SP4, to provide coordination and evaluation of individual service delivery;

- designate a managerial staff person, other than SP3, to provide program management and oversight of the services provided by the license holder; and
 - submit the names and qualifications for the person(s) who will fulfill the duties and responsibilities of the designated coordinator and designated manager for DHS review and approval. The same person may work in both roles if they meet the necessary qualifications. You are responsible for ensuring the person(s) meet the necessary qualifications. You must maintain documentation of your designated coordinators and designated manager's qualifications in their personnel record and a signed job description. Changes to these positions may not be made without prior notification and approval by DHS.
4. Within 60 days of receiving this order, you must:
 - ensure the corrective action outlined in citations 2 through 5, and 7 through 15 is completed;
 - submit a written plan to DHS detailing how you will audit all persons served records for compliance with all applicable rules and statutes that includes the roles and responsibilities the designated coordinator and designated manager will have in auditing persons served records; and
 - submit the date to your DHS licensor that all persons served, and personnel records will be brought into compliance based on the results of your audit. This date must be within 90 days of receiving this order.
 5. During the first three months of your conditional license, no new admissions will be allowed. After this time, you must notify your licensor and receive approval prior to admitting new persons served to your program. The notification to your licensor must include the name of the person served, the name and contact information for the person's case manager, the service(s) you will provide to the person, the person's anticipated service initiation date for each service, and documentation of compliance with term 1 of your conditional license.
 6. You may not apply for other DHS-issued licenses without prior approval from DHS for the duration of this conditional license.

Submissions required as part of a corrective action ordered must be sent to your DHS licensor at:

1. By secure email at erin.white1@state.mn.us; or
2. If you are unable to submit corrective action ordered securely through email, you can fax 651-431-7673 or mail using the information below:

Commissioner, Department of Human Services
ATTN: Erin White
Licensing Division
PO Box 64242
St. Paul, MN 55164-0242

YOUR RIGHT TO REQUEST RECONSIDERATION

You have the right to request reconsideration of this order and the cited violations. Your request must:

- Be in writing
- Clearly state that you are requesting reconsideration of the conditional license
- List each citation you are challenging and identify what is inaccurate or incomplete about the information in the order
- Supply information that is accurate or more complete
- State why you believe your license should not be on a conditional status
- Be made before the deadlines provided below

If you are mailing your request, it must be sent by certified mail and postmarked within 10 calendar days from when you received this order. If you do not meet this deadline, you lose your right to request reconsideration. The timeline to appeal began when you received this order. Please send it 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

If your request is being personally delivered, it must be received by DHS within 10 calendar days from when you received this order. Please bring it to:

Commissioner, Department of Human Services
Office of Inspector General
Legal Counsel's Office
Attn: Licensing Legal Unit
444 Lafayette Road North
St. Paul, MN 55155

Conditional license stayed pending reconsideration

If you request reconsideration within the timeframes described above, the terms of the conditional license will not take effect until a decision is issued by DHS. If the conditional license is affirmed on reconsideration, the terms would take effect on the date of the reconsideration decision, and run for two years from that date. You continue to be required to comply with all Home and Community-Based Services laws and rules.

Legal authority for this licensing action

- This action is taken under Minnesota Statutes, section 245A.06, subdivision 1.
- Home and Community-Based Services are required to follow Minnesota Statutes 245A, 245D, and Minnesota Rules, chapter 9544.
- The timeline to request reconsideration of the order is provided in Minnesota Statutes, section 245A.06, subdivision 4.

Abdi Ali, Authorized Agent

March 11, 2026

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- If a license holder files a timely reconsideration request, the terms of the conditional license are stayed pending a decision by DHS under Minnesota Statutes, section 245A.06, subdivision 4.
- Minnesota Statutes, section 245A.06, subdivision 3 states that DHS may impose additional licensing actions against a license holder that does not correct the violations cited in a conditional license order.

Questions

If you have any further questions regarding this matter, you may contact Leota Bemis, Supervisor, at 651-431-5637.

Sincerely,

A handwritten signature in black ink, appearing to read "Christala Culhane", is written over a light gray rectangular background.

Christala Culhane, Unit Manager
Licensing Division
Office of Inspector General