

STATE OF MINNESOTA

MINNESOTA DEPARTMENT OF

COUNTY OF RAMSEY

HUMAN SERVICES

IN THE MATTER OF THE PROPOSED RULES
OF THE MINNESOTA DEPARTMENT OF HUMAN
SERVICES GOVERNING THE RELOCATION OF
NURSING HOME RESIDENTS (MINNESOTA
RULES 9546.0010 - 9545.0060 [PROPOSED])

STATEMENT OF NEED
AND REASONABLENESS

BACKGROUND

These proposed rules seek to address the need to protect residents of long-term care facilities from unnecessary trauma and disruption during mass transfer to another facility.

The involuntary transfer of elderly or frail persons has been shown to entail considerable risk. Social relationships are disrupted, morale declines, persons become disoriented, and morbidity and mortality increase. Concerns raised by advocates, county case workers, medical personnel and families of nursing home residents led in 1979 to the development of relocation procedures designed to protect nursing home residents from unnecessary "transfer trauma." The Minnesota Board on Aging, working closely with the Medical Assistance Division of the Department of Public Welfare issued these "Proposed Guidelines for Relocation of Medical Assistance Residents in Long-Term Care Facilities" on September 10, 1979. (See DPW Informational Bulletin #79-77.)

On July 15, 1980, amid new concerns arising out of implementation of the 1976 law equalizing private and medicaid nursing home rates, a 19-member task force was appointed, representing providers, consumers, and county and health professionals. Their mission was to develop and coordinate an orderly program for relocation of residents of long-term care facilities. Twelve meetings were held from July 23, 1980 to November 19, 1980, and a final Relocation Task Force Report was presented on October 9, 1981.

Minnesota Statutes, 1983 Supplement, section 144A.31, subdivision 4, as amended by Laws of Minnesota 1984, chapter 641, section 12 (codified at Minnesota Statutes, section 144A.31, subdivision 4) authorized the Commissioner of Human Services to promulgate rules which will implement a resident relocation plan that instructs the county in which the nursing home is located of procedures to ensure that the needs of residents in the nursing home are met during a relocation.

Minnesota Rules, parts 9546.0010 - 9546.0060, proposed for adoption as permanent rules, implement the recommendations of the Relocation Task Force and the expressed requirements of the Minnesota Legislature.

Part 9546.0010 Applicability.

Minnesota Statutes, section 144A.31, subdivision 4, mandates the Commissioner of Human Services to implement a resident relocation plan that instructs the local social service agency for the county in which a long-term care facility is located of procedures that ensure that the needs of residents are met during a relocation. These rules, parts 9546.0010 to 9546.0060, are necessary and reasonable to implement the resident relocation plan and instruct the local agency of their responsibilities for and under this plan. It is necessary to refer to the Minnesota Department of Health rule, 7 MCAR § 1.801 [Temporary], because the responsibilities of long-term care facilities which it describes should be read along with this rule in order to understand the entire relocation process.

Part 9546.0020 Definitions.

This rule defines words and phrases that have a meaning specific to parts 9546.0010 to 9546.0060, that may have several possible interpretations, or that need exact definitions in order to be consistent with statutes. Terms used in a manner consistent with current common usage in the long-term care field are not defined unless a standard for use of the term is required.

Subpart 1. Scope. This provision is necessary and reasonable to clarify that these definitions apply to the entire sequence of parts 9546.0010 to 9546.0060.

Subpart 2. Certification level. It is necessary to define this term because it is used throughout these rule parts, and its meaning is open to various interpretations. This definition is reasonable because it identifies the federal regulations which govern the levels of care which a facility can be certified to provide.

Subpart 3. Commissioner. It is necessary to define this term because it is used as an abbreviation, and it is open to several interpretations. It is reasonable to use this abbreviation because it eliminates unnecessary words throughout the rule parts.

Subpart 4. County relocation committee. It is necessary to define this term because it is used throughout parts 9546.0010 to 9546.0060 and it is open to several possible interpretations. This definition is reasonable because it establishes who the committee members may be, and who is responsible for designating committee members.

Subpart 5. Facility. The term "facility" is defined for the purpose of parts 9546.0010 to 9546.0060 so that it is not necessary to repeat the more lengthy term, long-term care facility. It is reasonable to define this term with reference to state licensure laws and federal certification laws because these are the specific facilities regulated by Minnesota Statutes, Chapter 144A. It is necessary to clarify that facilities for the mentally retarded are excluded from this definition because they are certified under the same federal statute as facilities for the elderly. It is reasonable to exclude facilities for the mentally retarded because their licensure

requirements are defined under a different state statute.

Subp. 6. Local agency. This definition is necessary because the term is open to several possible interpretations. It is reasonable to clarify that for the purpose of these rules, this is the agency responsible directly to the county board of commissioners or the human service board for the provision of social services.

Subp. 7. Medical assistance. It is necessary to define this term because it has a specific meaning under these rules. This definition is reasonable because it identifies the federal law and state statutes which govern this program.

Subp. 8. Medicare. It is necessary to define this term because it has a specific meaning under these rules. This definition is reasonable because it identifies the federal law which established and governs this program.

Subp. 9. Relocation. It is necessary to define this term because it is open to several possible interpretations, and it has a meaning specific to this rule. This definition is reasonable because it is consistent with the situations described in Minnesota Statutes, section 144A.31, subdivision 4, which trigger the duties under these rules.

Subp. 10. Resident. It is necessary to define this term because it is open to several possible interpretations. This definition is reasonable because it limits the meaning to persons residing in facilities affected by this rule, and it is consistent with current common usage in the field of long-term care.

Subp. 11. Responsible county. Minnesota statutes, section 144A.31, subdivision 4, requires the county where a facility which will be discharging residents is located to provide relocation assistance. This definition is necessary in order to provide consistency with the statute which authorizes these rules. This definition is reasonable because the county in which the facility is located is geographically closest to the residents being relocated, and can thus be more immediately responsive to residents needs and concerns.

Subp. 12. Swing bed. It is necessary to define this term because it is open to various interpretations. This definition is reasonable because it identifies the federal regulations which permit acute care hospitals to provide intermediate care and skilled nursing facility services under the Medicare program.

Part 9546.0030 Procedure Upon Notification.

This part is necessary to clarify when the procedures for relocation assistance must be initiated by the local social service agency and the county relocation committee. It is reasonable for the procedures to be initiated only upon receipt of notice of their need because it avoids requiring burdensome paperwork of the county prior to the time when the assistance being reported upon is actually required. Minnesota Department of Health rules, 7 MCAR § 1.801 [Temporary] subpart C, item 3, subitem b, requires the

facility to notify the local social service agency at least 60 days prior to the date when the relocation of residents is to be completed. By requiring the county relocation committee to initiate their procedures upon receiving notice from the facility, they will have 60 days to provide relocation assistance.

Part 9546.0040. Relocation Planning.

Over 200 studies since 1945 have suggested that involuntary relocation of elderly or frail persons, particularly from one institution to another, entails considerable risk including disruption of social relations, decline in morale, disorientation, and increase in mortality and morbidity. It has been shown, however, that this phenomenon, termed "transfer trauma", can be substantially reduced by providing adequate notice of the move coupled with a program of counseling, visitation to the new home, and coordination of the relocation process. (See page 3 of the Task Force on Relocation Report and Exhibit 6, page 5, Boureston and Tars, "Alterations in Life Patterns Following Nursing Home Relocation," The Gerontologist, pp. 506-510 (December, 1974).) These rules governing relocation planning are necessary to ensure the protection of vulnerable adults who are being involuntarily relocated from one facility to another and who are therefor subject to transfer trauma. These rules are reasonable because they are consistent with established Department of Human Service policy regarding the transfer of Medical Assistance residents (see Informational Bulletin #79-77, Guidelines for Relocation of MA Residents in Long-Term Care Facilities) and consistent with the federal requirements that a State Medicaid plan be designed so as to provide for the best interests of recipients (see SSA Section 1902 (a) (19)).

Subpart 1. Relocation committee. In each county where a facility from which residents will be discharged is located, it is necessary to designate who is responsible for providing relocation assistance. This provision establishes who is responsible for designating the people who are to serve on the county relocation committee and who is eligible to be appointed to serve on the county relocation committee. It is reasonable that the director of the local social service agency appoint staff from that agency because it is the local agency which is authorized by the county board of commissioners or the human service board to provide social services to residents of that county, and the local agency is responsible for protection of vulnerable adults under Minnesota Statutes, section 626.557. It is necessary for the members of the committee to be knowledgeable about the needs of long-term care residents and the local resources available to meet these needs because the time available for the provision of relocation services is very limited, and there is insufficient time for committee members to learn about these needs and local resources after these procedures are initiated. The requirement of knowledge is reasonable, because local social service agencies employ persons with this knowledge.

Subpart 2. Alternative resources. These provisions are necessary because the time available for the provision of relocation services is very limited. If the county relocation committee is to carry out its functions within these time constraints, it must have a procedure for identifying and

monitoring the availability of alternative resources once it is called upon to initiate the procedures provided in parts 9546.0040 and 9546.0060. It is reasonable to require the development of these procedures because they will prevent unnecessary delay in initiating relocation services. (See Pennsylvania State Relocation Plan, Exhibit 5, page 5, of Informational Bulletin #79-77, re: the necessity for maintaining a list of available beds.)

A. It is necessary for unoccupied beds in other facilities to be included, because Minnesota Statutes, section 144A.31, subdivision 4, requires the county to ensure placement in other facilities where beds are available and it is otherwise appropriate. It is reasonable to include facilities in neighboring counties because where there are insufficient unoccupied beds within the county and where a resident's family or friends live very near the border of another county the most appropriate placement might be in a facility in the neighboring county. It is reasonable to include subitems (1) through (4) because all these items can be obtained from a single contact with each facility.

(1) It is necessary for the list to contain the name, address, and phone number for each facility so that the committee and the residents know how to contact the facility should they need to obtain information from them.

(2) It is necessary for the list to contain the certification level of the available beds because residents being relocated would require placement in a facility certified to provide the same level of care as they are currently receiving.

(3) It is necessary for the list to contain the type of services available within the facility so the committee can match a relocating resident's need for a specific service with the services' availability in another facility.

(4) It is necessary for the list to contain the number of beds available in order for the committee to determine how many of the residents could be relocated to a specific facility.

B. These provisions are necessary and reasonable because Minnesota Statutes, section 144A.31, subdivision 4, requires the county to ensure placements in swing beds in hospitals and in foster care where such placements are available and appropriate.

C. These provisions are necessary and reasonable because Minnesota Statutes, section 144A.31, subdivision 4, requires the county to ensure utilization of home health care and other alternatives on a temporary basis, as available and appropriate.

D. It is necessary and reasonable to include a list of transportation services because these services are required in order to implement the provisions in part 9546.0050, subpart 4, items D. and E.

E. It is necessary and reasonable to include a list of possible volunteer resources because such resources might be valuable in supple-

menting staff resources during a relocation, and the Department of Human Services had made a strong commitment to increase the use and effectiveness of volunteers wherever possible. (See Request Bulletin #84-37 for a statement of this policy.)

F. Minnesota Statutes, section 144.651, subdivision 29, requires that residents be provided with the address and telephone number of the area nursing home ombudsman when they are notified of any proposed transfer.

Part 9546.0050. Relocation assistance.

Subpart 1. Resident information. These provisions are necessary in order for the county relocation committee to carry out the procedures established by these rules. It is necessary for the county relocation committee to have the names of each resident and the name and address of either a family member or the person legally responsible for their care because the county relocation committee must be able to contact the residents and their families in order to involve them in the relocation process. Minnesota Statutes, section 144A.31, subdivision 4, requires resident and family or guardian involvement in the planning for relocation. It is reasonable for the county relocation committee to obtain this information from the facility because the facility has this information in their records and 7 MCAR § 1.801 [Temporary] subpart C, item 3, subitem b, requires the facility to release this information to the local social service agency in order to facilitate the relocation of residents. Frequent contacts between the county relocation committee and the facility may be necessary in order for the county relocation committee to carry out the procedures established to ensure resident and family involvement in the resident's relocation. It is necessary, therefore, for the county relocation committee to obtain the name and phone number for the individual within the facility who can be contacted for further information concerning residents and their families. It is reasonable to require the county relocation committee to obtain this information at least 60 days prior to the date set for the completion of the relocation to allow for the orderly transfer of residents. (See Pennsylvania State Relocation Plan, Exhibit 5, page 6, of Informational Bulletin #79-77 re: information to obtain upon initial contact with a facility.)

Subpart 2. Coordination of relocation. 7 MCAR § 1.801 [Temporary], requires the facility from which residents are being relocated to assume certain responsibilities. This provision, requiring the county relocation committee to designate one of its members as a liaison to the facility, is necessary to ensure that the assistance being offered by the county relocation committee is coordinated with actions taken by the facility to make communications easier. It is reasonable to designate one of the county relocation committee members as a liaison so that the individual can meet with the facility staff to coordinate their respective efforts. It is reasonable for the county relocation committee to designate a liaison and for the liaison to participate in group meetings of residents, their families and legal guardians since the liaison is capable of explaining the assistance the county relocation committee is offering to residents who are being relocated.

Subpart 3. Offer of assistance. These provisions are necessary in order to inform the resident and the resident's family or the person legally responsible for their care that relocation assistance is available. It is reasonable that this offer of assistance be made in writing to verify that such offer was made and to provide the recipients of the offer with something to refer to should they wish to request further information, explanation or assistance. It is necessary for the offer to be sent to both the resident and the family or person legally responsible because Minnesota Statutes, section 144A.31, subdivision 4, requires residents and their families or guardians to be involved in planning the relocation. It is reasonable to include family or persons legally responsible because the resident may require the assistance of their family or guardian to understand and accept the offer of assistance.

A list of relocation assistance services might appear complicated and confusing to individuals who do not work in the field of long-term care. It is necessary, therefore, that an explanation be a part of the offer of assistance so that persons who receive it will be able to make more informed decisions regarding whether to request any of the offered assistance. It is reasonable to include this explanation to ensure that residents, their families, and persons legally responsible for the resident's care have a meaningful opportunity to participate in the relocation process.

It is necessary for the offer to include the name, address, and phone number of the individual to be contacted for further information and assistance so that the person with questions may know who to contact. It is reasonable to include this information in the offer of assistance so that the person reading the offer and having questions will know immediately who to contact.

Subpart 4. Relocation services. Studies conducted by the University of Michigan's Institute of Gerontology have shown that the most effective ways to reduce transfer trauma are to provide residents with advance notice to the relocation, counseling prior to the relocation, an opportunity to visit the new home where possible, and coordination of the relocation process. (See page 3 of the Task Force on Relocation Report and Exhibit 3, page 1, Relocation Report 3; Preparation for Relocation.) Minnesota Statutes, Section 144A.31, subdivision 4, requires the Commissioner of Human Services to implement a resident relocation plan that instructs the responsible county of procedures to ensure that the needs of residents are met. The provisions of this subpart are necessary to carry out the mandate of the statute and to minimize the amount of transfer trauma experienced by the residents being relocated. It is reasonable to define the specific relocation services must be made available so that the county, the local agency and its relocation committee will know what steps they are required to take and what services they are required to make available.

A. Minnesota Statutes, section 144.651 provides that resident's rights to independent personal decisions and the knowledge of available choices must not be infringed. It is necessary and reasonable to provide accurate information about the available alternatives so that the residents to be relocated will know what options are available in selecting a new facility. The resources identified in Part 9546.0040, subpart 2, include

the alternatives listed in Minnesota Statutes, section 144A.31, subdivision 4. (See also Exhibit 4, page 1, section 9 of Model Recommendations: Intermediate Sanctions for Enforcement of Quality of Care in Nursing Homes, ABA Commission on Legal Problems of the Elderly, and Exhibit 9, page 4, Procedure for Involuntary Transfer of Patients, New York State Plan, found in Informational Bulletin #79-77.)

B. It is necessary and reasonable to provide the resident with assistance in choosing among the alternatives, to ensure that the resident is making a choice based on accurate information and with a clear understanding of both the alternative selected and those rejected.

C. It is necessary to provide the resident with counseling to ensure that the resident will adjust to the relocation. (See Exhibit 5, page 7, and Exhibit 9, S 600, the Pennsylvania and New York State Relocation Plans for other requirements for resident counseling, as well as Exhibit 7, "District of Columbia and Attorneys for Residents work out Relocation for Closing of Nursing Home," Older Americans Advocacy Assistance Program News, found in Information Bulletin #79-77.)

It is reasonable that the county relocation committee, which has developed the procedure for identifying and monitoring the current availability of alternative resources pursuant to Part 9546.0040 and whose members are appointed because of their knowledge of the needs of long-term care residents and the resources available to meet those needs, should provide or arrange for the services described in items A., B., and C. The county relocation committee has direct access to the information in item A. and is knowledgeable about residents' needs which require consideration in the provision of items B. and C.

D. These provisions are necessary to ensure that the resident has information about his or her new placement and that the resident's risk of transfer trauma is minimized by providing an opportunity to become familiar with the new surrounding and the people who will be providing care in these new surroundings prior to the actual move. Studies have shown that the most successful relocations are those in which the residents to be relocated are provided with a number of opportunities to learn, through a number of different senses, about their new placement. (See letter from Dr. Bourestom, attached to the Task Force on Relocation Final Report.)

(1) Minnesota Statutes, section 144.651 requires that residents be notified, in writing, of a proposed discharge or transfer. It is reasonable to require that residents be provided with written information about the new facility so that they may read or have the information read to them and be able to refer to it when they have questions. This opportunity provides for concrete and redundant cueing, a requirement if the frail elderly are to adequately assimilate information. (See letter from Dr. Bourestom, attached to the Task Force on Relocation Final Report.)

(2) and (3) Studies have shown that it is important to provide residents an opportunity to become familiar with a new facility prior to relocation. Where possible, this is best accomplished by having the resi-

dent visit the new facility. Where it is not possible for the resident to make this visit, a visit by residents and staff from the new facility will also help lessen the trauma to a relocating resident. (See Relocation Report 3, Preparation for Relocation, Institute of Gerontology, Ann Arbor, Michigan, found in Exhibit 3, page 1 of Informational Bulletin #79-77.) It is reasonable for the county relocation committee to provide or arrange for relocating residents to have these opportunities because the local agency is responsible for ensuring that the residents needs are met under Minnesota Statutes, section 144A.31, subdivision 4, and under the requirements to provide protection to vulnerable adults pursuant to Minnesota Statutes, section 626.557. (See also Pennsylvania and New York State Relocation plans Exhibit 5, page 7, and Exhibit 9, page 4 of Informational Bulletin #79-77 re: site visits to receiving facilities.)

E. It is necessary and reasonable that residents have assistance in arranging for transportation both for site visits and for the actual move. Since the county relocation committee is involved with all residents being relocated, the county relocation committee is in the best position to coordinate the use of transportation services which they have identified pursuant to Part 9546.0040, subpart 2 of this rule. (See Pennsylvania State Relocation Plan, Exhibit 5, pages 7 and 8 of Informational Bulletin #79-77 re: necessity for arranging transportation for residents.)

F. It is necessary that someone accompany the resident during the actual move to ensure that personal belongings are not lost in the transition and that the resident does not feel a loss of continuity. It is reasonable that the relocation committee assure that someone accompanies the resident because it is responsible for the coordination of transportation. (See Pennsylvania State Relocation Plan, Exhibit 5, page 8, of Informational Bulletin #79-77 re: necessity for assisting residents on the day of transfer and also Section 9 of the Model Recommendations: Intermediate Sanctions for Enforcement of Quality of Care in Nursing Homes, ABA Commission on Legal Problems of the Elderly, Exhibit 4, page 2, re: resident's need for assistance during transfer.)

Subp. 5. Follow-up visit. Counties are responsible for providing vulnerable adults with protective services pursuant to Minnesota Statutes, section 626.557. Local social service agencies, authorized to provide social services by county boards of commissioners or human service boards, are responsible for assuring that the residents being relocated, who are all categorically vulnerable pursuant to Minnesota Statutes, section 626.557, subdivision 2(b)(1), are provided with client protection services in their new environment. It follows from these requirements that it is necessary for relocation committee members who are all on the staff of the local social service agency, to make a follow-up visit to each resident who is relocated. It is reasonable that the visit should include interviews, observations, discussions, and a review of resident records because through these various means the relocation committee can best assess the appropriateness and success of the placement.

A. and B. It is necessary and reasonable that the county relocation committee, since they have been working with the residents for up to 60 days prior to the relocation and they are knowledgeable about the needs of long-

term care residents and the resources available to meet those needs, should assess the adjustment of each resident and recommend services or methods of meeting the needs of a resident where special needs have arisen out of the relocation.

Part 9546.0060. Reporting.

Subpart 1. Initial report. Minnesota Statutes, section 144A.31, subdivision 4, places responsibility for implementation of the relocation plan on the Department of Human Services. These provisions are necessary because the Department of Human Services has responsibility for monitoring county compliance with these rules. The initial report by the county relocation committee is necessary for the department to carry out this responsibility, and to ensure that the county does not delay initiation of services under these rules. The requirement that the initial report be made within one week is reasonable, since the local agency should be ready to designate a county relocation committee and develop procedures for identifying and monitoring current availability of alternative resources upon receiving notice to initiate procedures under Minnesota Rules, part 9546.0030.

A. It is necessary and reasonable for the initial report to include the names and phone numbers of the committee members so that the department staff will know who to contact and how to reach committee members.

B. It is necessary and reasonable for the initial report to contain the procedure developed to identify and monitor the availability of resources in order to document that the county is in compliance with Part 9546.0040, subpart 2, of these rules.

C. It is necessary and reasonable for the initial report to contain a timetable for the completion of the relocation process so that the department may evaluate the committee's plan and monitor its progress according to the plan.

Subpart 2. Status reports. Weekly status reports are necessary for the department to ensure that the county relocation committee is adhering to the timetable they provided in their initial report, and that they are in compliance with these rules. It is reasonable to require weekly reports because the very limited time available to complete the relocation process makes it necessary to deal as quickly as possible with any problems which may arise, in order to prevent delays.

It is necessary for the reports to indicate the number of residents relocated during the week, so that the department can ensure that too high a percentage of residents are not being left to relocate the final week, thus defeating the purpose of having a planned, deliberate relocation process. It is reasonable for the department to monitor the number of residents relocating because of the potential problems which might arise, such as inadequate transportation resources available, should too high a number of residents be left to be moved until the final week of a facility's operation.

It is necessary and reasonable for the reports to include the date of each residents relocation because it provides an additional means of

identifying individual resident's transfers for purposes of documenting the implementation of the county relocation plan.

It is necessary and reasonable for the report to include the new placement for each resident relocated so the department can ensure that the new placements comply with the requirements of Minnesota Statutes, section 144A.31, subdivision 4, which requires the county to ensure placement in swing beds in hospitals, placement in unoccupied beds in other nursing homes, utilization of home health care on a temporary basis, foster care placement, or other appropriate alternative care.

It is necessary and reasonable for the reports to identify any specific problems which arise concerning the relocation process so that the department may assist in solving those problems as quickly as possible, thereby avoiding unnecessary delays in the relocation process.

Subpart 3. Summary report. These provisions are necessary so that the department can determine whether the needs of residents have been met, whether the county was in compliance with the requirements of these rules, and whether the resident relocation plan should be revised to correct any problems which arose during its implementation. It is reasonable to require the relocation committee to submit a summary report because it facilitates the department's ability to evaluate the relocation procedure.

A., B., C., and D. It is necessary and reasonable for the summary report to include the information in items A. through D. in order to document for the Department of Human Services that the county can verify where each resident has been relocated to, and to document county compliance with the statute and these rules.

E. It is necessary for the summary report to include the status of each resident at the time of the follow-up visit to verify that the county has provided adequate client protection services. This information is reasonable because it will also assist the department in evaluating the effectiveness of the relocation plan as one element of a comprehensive approach to adult protection services in the State of Minnesota. (See Pennsylvania State Relocation Plan, Exhibit 5, page 8, of Information Bulletin #79-77, re: follow-up counseling to evaluate the placement and address any problems of adjustment, and also Exhibit 6, pages 5 and 6, Bourestom and Tars, "Alterations in Life Patterns Following Nursing Home Relocation," The Gerontologist, pp. 506-510 (December, 1974).)

F. It is necessary and reasonable for the summary report to indicate problems encountered during the relocation process so that the department can evaluate the effectiveness of the relocation plan and determine the most effective ways to deal with problems that were encountered.

Conclusion

The foregoing statements demonstrate the need for and reasonableness of proposed parts 9546.0010 - 9546.0060. To a great extent, the need for the rules is prescribed expressly by state statute and the responsibility of the Minnesota Department of Human Services to provide protection services to vulnerable adults.

EE-R01

Date: _____

3/21/85



LEONARD W. LEVINE
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BIBLIOGRAPHY

Department of Human Services Informational Bulletin #79-77

Task Force on Relocation Report

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Witness

No witnesses other than Department of Human Services and Minnesota Board on Aging personnel will be presenting testimony at the public hearing.

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COUNTY OF RAMSEY

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SERVICES GOVERNING THE RELOCATION OF
NURSING HOME RESIDENTS (MINNESOTA
RULES 9546.0010 - 9545.0060 [PROPOSED])

EXHIBITS

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