



3 West Road | Virks Building | Cranston, RI 02920

Home and Community Based Settings Requirements Rhode Island Survey Tool – Assisted Living

All settings in which individuals receive Medicaid Home and Community Based Services (HCBS) must meet the requirements of the federal HCBS Settings Rule, [42 C.F.R. § 441.301\(c\)\(4\)](#). Assisted living providers are required to submit policies and procedures to document compliance with the following requirements as a condition of certification and participation in the Medicaid program. All questions in this survey must be answered and accompanying policies and procedures provided. Please use the evidence section to indicate which policies and procedures satisfy the requirements of each section.

For initial certification, all applicable policies and procedures must be provided to EOHHS. For recertification, providers are required to submit only those policies and procedures that have changed since the last HCBS Settings Rule review. The bulleted questions help to answer the numbered questions leading each section.

The Executive Office of Health and Human Services (EOHHS) may request policy revisions, additional documentation, and/or conduct site visits as needed to fully evaluate compliance. A letter will be issued by EOHHS to document these findings.

Provider Name: The Seasons

NPI: 1962726034 License Number: ALR01523

Address: 5 St. Elizabeth Way City: East Greenwich State: RI Zip Code: 02818

Person Completing Survey: Haigouhi Corriveau Role: Executive Director

| 1. Is the setting integrated in the greater community? [42 C.F.R. § 441.301(c)(4)(i)] | Yes | No | Comments: |
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| <ul style="list-style-type: none"> Is the setting in a public or privately-owned facility that provides inpatient treatment? <i>Note: If yes, the setting is subject to heightened scrutiny review.</i> | | X | |
| <ul style="list-style-type: none"> Is the setting on the grounds of, or immediately adjacent to a publicly funded healthcare institution? <i>Note: If yes, the setting is subject to heightened scrutiny review.</i> | X | | <p>The Seasons is located on campus with St. Elizabeth Home, a nursing facility that accepts Medicare, Medicaid and private insurances. The State identifies this setting as a category 2, as it is “located on the grounds of, or immediately adjacent to a publicly funded healthcare institution.”</p> <p>Please refer to website: The Seasons Assisted Living and Retirement Community</p> |
| 2. Does the setting support full access of individuals receiving Medicaid HCBS to the greater community to the same degree as individuals not receiving Medicaid HCBS? [42 C.F.R. § 441.301(c)(4)(i)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Do individuals shop, attend religious services, schedule appointments, have lunch with family and friends, etc., in the community, as they choose? | X | | <p>Based on policy review and observations at a site visit, residents are encouraged to meet with friends and family and participate in social, religious, and community activities of their own choice. The Seasons provides residents with daily, weekly and monthly activity schedules that include both on and off-site activities. The Resident Handbook and Residency Agreement assert that residents are encouraged to participate in both on-site and off-site activities.</p> |
| <ul style="list-style-type: none"> Do individuals schedule their days of service and/or arrival and departure times based on their preferences? | X | | <p>Based on policy review and on-site visit, residents may arrange their own services with providers of their choice. The Resident Handbook asserts that residents have the freedom to come and go as they please and may provide input on days/times for services including showers and laundry services.</p> |
| <ul style="list-style-type: none"> Do individuals in the setting have access to public transportation? If not, are other resources provided | X | | <p>A public bus stop is nearby the residence. Residents may have their own vehicles and parking is provided. The residence</p> |

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| for the individual to access the broader community? | | | provides limited medical transportation as well as transportation for shopping, banking and group recreational activities based on resident interest. Residents may also schedule chauffeur services for a fee. Medicaid members have full access to the Medicaid non-emergency medical transportation, which is available at no cost. The residence provides information and assistance coordinating Medicaid funded transportation. Transportation options are described in the Resident Handbook and the Residency Agreement. |
| <ul style="list-style-type: none"> Does the setting offer opportunities for individuals to receive multiple types of services and activities OFF-site and not setting-operated, including day services, medical, behavioral and social/recreational services? Note: If most individuals receive multiple types of services and activities ON-site, then answer “No” to this question. | X | | <p>Based on policy review and on-site visit, residents can engage in social and recreational activities off-site, whenever desired. The Residency Agreement includes a list of items and services available from outside vendors.</p> <p>State staff observed postings for a pickle ball clinic at local off-site venue as well as an upcoming event at local university.</p> |
| <ul style="list-style-type: none"> Is the setting in the community among other private residences and retail businesses? | X | | Yes. The setting is at the edge of a residential neighborhood and in close proximity to businesses and dining. |
| 3. Does the setting provide opportunities to engage in community life? [42 C.F.R. § 441.301(c)(4)(i)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Do individuals participate regularly in meaningful non-work activities in integrated community settings for the period desired by the individual? | X | | Based on policy review and on-site visit, residents have opportunities to engage in meaningful non-work activities of their choice, both on and off site. |
| <ul style="list-style-type: none"> Are individuals aware of (or do individuals have access to materials to become aware of) activities occurring outside of the setting? | X | | Based on observations at on-site visit, daily, local newspapers are found in common areas throughout facility and information on community events is posted on a community bulletin board. |
| 4. Is the individual employed or does the individual attend activities and receive services outside of the setting? [42 C.F.R. § 441.301(c)(4)(i)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> If work is a goal, do individuals have opportunities to work in competitive, integrated community settings? | X | | Based on policy review and on-site visit, information about senior employment resources is available and posted on community bulletin board. The Activity Assessment screens for residents' interest in learning about work opportunities. |

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| <ul style="list-style-type: none"> If work is a goal, are there activities with the individual to pursue work as an option? | X | | If a resident identifies an interest in work, staff engage with the person to find ways to support that interest including directing the resident to resources to find employment and supporting the resident when working. At on-site visit, staff shared following to highlight ways the residence had made accommodations to support residents work schedule. A resident was employed upon admission to The Seasons and required individualized mealtimes arranged to accommodate his work schedule. The residence provided a lunch for him to take to the work site. |
| <ul style="list-style-type: none"> If work is not a goal, do individuals participate in meaningful day activities outside the setting? | X | | Residents can participate in residence organized and self-selected meaningful activities outside of the setting. At on-site visit, state staff observed posting of upcoming community activities and events. Residents have opportunity to participate in determining and planning outside activities through Town Hall and Activity Council meetings. Residents are also free to come and go as they please, participating independently in community activities they choose. |
| 5. Does the setting provide opportunities to control personal resources? [42 C.F.R. § 441.301(c)(4)(i)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Do individuals have a checking or savings account or other means to control funds? | X | | Based on review of policy, residents manage their own financial affairs and can maintain and access their own funds as they choose. Residents may authorize residence to manage limited personal funds, up to \$100, but are not required to do so. The Residency Agreement and Residents Rights policies attest to the residents right to manage their own funds. |
| <ul style="list-style-type: none"> Do individuals have access to their funds? | X | | Residents have full access to their own funds and can access personal funds deposited with residence as indicated in the Residency Agreement and Residents Rights. |
| 6. Does the setting ensure freedom from coercion and restraint? [42 C.F.R. § 441.301(c)(4)(iii)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Is information about filing a complaint posted in an obvious location and in an understandable format? | X | | Based on policy review and on-site visit, information about making complaints and airing concerns is posted in an obvious location and available in plain language for individuals and families. Contact information for outside resources such as the long-term care ombudsman is also posted. The Statement of |

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| | | | Resident's Personal Rights and Resident Handbook include information about reporting grievances. |
| • Are individuals comfortable discussing concerns? | X | | At the site-visit, state staff observed multiple instances when residents appeared comfortable approaching and interacting with staff. Residents shared positive feedback with state staff. |
| • Do individuals know how to make a complaint? | X | | Based on policy review and on-site visit, residents are made aware of how to make complaints/grievances. The Grievance policy, Residency Agreement, and Resident Handbook cite information about making grievances and provide community contacts for reporting problems. At the site visit, state staff observed the Grievance Poster, and the Grievance policy posted on the community bulletin board. |
| 7. Does the setting ensure dignity and respect? [42 C.F.R. § 441.301(c)(4)(iii)] | Yes | No | Comments: |
| • Are individuals who need assistance with grooming groomed as they desire? | X | | Based on on-site visit and policy review, residents were uniquely dressed. The Personal Care policy states that residents are encouraged to pick out their clothing and dress themselves. Residents who need assistance with grooming are encouraged to select their clothing. The Statement of Resident's Personal Rights and the residents Service Plan affirm that individuals receive assistance according to their choices and preferences. |
| • Are individuals dressed in clothes that fit, are clean, and are appropriate for the time of day, weather, and preferences? | X | | Based on on-site visit and policy review, residents are groomed in clothing appropriate for time of day, weather and setting. Policies document that individuals receive assistance in the way they choose and that they are treated with respect. Based on site visit observations, individuals were dressed and groomed appropriately and comfortably. |
| • Do staff address individuals in the manner in which the person would like to be addressed as opposed to routinely addressing individuals as hon or sweetie? | X | | Based on on-site visit and policy review, staff were observed speaking respectfully to residents. Residents' name preference is requested on initial Activity Assessment and respectful communication is addressed in Dignity and Respect in Care Settings – Staff training module. |

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| <ul style="list-style-type: none"> Is informal (written and oral) communication conducted in a language that individuals understand? | X | | Based on on-site visit and policy review, staff speak to residents kindly and in an understandable manner. Posted information was presented in plain language as demonstrated by the Grievance poster, Residents Rights Policy and Resident Handbook assert that The Seasons will provide appropriate accommodation to ensure both written and spoken information are understood |
| <ul style="list-style-type: none"> Do staff talk to other staff about individual(s) with dignity and respect? | X | | Based on on-site visit and policy review, staff referred to residents with respect. The Dignity and Respect in Care Settings – Staff training module promote dignity and respect in all interactions. |
| <ul style="list-style-type: none"> Do staff ensure that conversations about individuals occur privately and not within earshot of other persons living in the setting? | X | | Based on on-site visit and policy review, state staff observed that residence staff discontinued conversation as resident approached and continued when in more private setting. The HIPAA policy outlines employee training and responsibilities concerning confidentiality. The HIPAA policy states, “All employees are required to use sensitivity when discussing resident matters on the telephone or in person within hearing distance of others so that conversations are not overheard.” |
| 8. Does the setting facilitate choices regarding services and supports and who provides them? [42 C.F.R. § 441.301(c)(4)(v)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Does staff ask individuals about their needs and preferences? | X | | Based on policy review, The Seasons is committed to supporting resident preferences and will make every effort to accommodate requests. As described in the Resident Handbook, Town Hall, Activity Council, and Menu Chat meetings are held monthly with management and staff to share suggestions, discuss upcoming events, address concerns, and talk about matters of interest. Resident needs and preferences are gathered in initial assessment and integrated into service plan. |
| <ul style="list-style-type: none"> Are individuals aware of how to make a service request? | X | | The Resident Handbook includes directions and contact information for making requests specific to the service type. |
| <ul style="list-style-type: none"> Can individuals choose the provider or staff who render the services they receive? | | | The Seasons Disclosure Statement states that residents may indicate preferences regarding care, staff, and schedules as well as obtain services through the residence or through a third-party provider. The Resident Handbook asserts that resident can select |

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| | | | their pharmacy provider. Resident Rights asserts that residents can select their own dentists and physicians. |
| 9. Does the setting optimize individual initiative, autonomy, and independence in making life choices? [42 C.F.R. § 441.301(c)(4)(iv)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Are individuals given information to assist them to make informed decisions? | | | The Resident Handbook, Assisted Living Disclosure Statement, Residency Agreement and Resident Rights provide information to support informed decision making. |
| <ul style="list-style-type: none"> Are individuals learning skills to enable them to maximize independence? | | | The Resident Handbook, Assisted Living Disclosure Statement, and Residency Agreement refer to several activities available to residents which enhance independence and teach new skills. The Seasons September 2025 activity calendar includes several health and wellness activities. |
| 10. Is there a legally enforceable agreement comparable to a lease? [42 C.F.R. § 441.301(c)(4)(vi)(A)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Do individuals know their rights regarding housing and when they could be required to relocate? | X | | The Residency Agreement and the Statement of Resident's Personal Rights and Resident Disclosure Statement provide information on criteria for discharge and role of residence in process. |
| <ul style="list-style-type: none"> Does the written agreement include language that provides protections to address eviction processes and appeals comparable to those provided under RI landlord/tenant laws? | X | | The Residency Agreement and Admission and Discharge Criteria policy include language that appropriately addresses discharge and eviction. |
| 11. Does the setting ensure individuals' right to have privacy? [42 C.F.R. § 441.301(c)(4)(iii) and 42 C.F.R. § 441.301(c)(4)(vi)(B)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Do staff or other residents always knock and receive permission prior to entering an individual's living space? | X | | Based on on-site visit observations, staff knock and request permission to enter an individual's private space. As evidenced in review of training materials, The Dignity and Respect in Care Settings – Staff training handout states that staff are to knock and request permission before entering resident apartment. |

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| • Can an individual have private visits with family and friends? | X | | At the site visit, state staff observed multiple community spaces, including rooms with doors, available for visits in addition to the residents' private rooms. |
| • Is health information about individuals kept private? | X | | The Resident's Personal Rights and HIPAA policy support privacy of health information. Residents Records policy asserts that records are kept in nurses' office and accessible to caregivers involved in care of resident. |
| • Do individuals have a private cell phone, computer or other personal communication device or have access to a telephone or other technology device to use for personal communication in private at any time? | X | | Based on on-site visit and policy review, state staff observed public telephones located on each floor of building. Residents can arrange for telephone service in their units and may have personal cell phones and computers, as described in the Resident Handbook. |
| 12. Do individuals have choice of roommates? [42 C.F.R. § 441.301(c)(4)(vi)(B)(2)] | Yes | No | Comments: |
| • Do individuals have their own bedroom? | X | | Each resident at The Seasons has their own bedroom. |
| • If not, are individuals given a choice of a roommate? | | | N/A. All rooms are private. |
| • Do individuals know how to request a roommate change? | | | N/A. All rooms are private. |

| 13. Do individuals have freedom to furnish and decorate their sleeping or living units? [42 C.F.R. § 441.301(c)(4)(vi)(B)(3)] | Yes | No | Comments: |
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| <ul style="list-style-type: none"> Are individual's personal items, such as pictures, books, and memorabilia are present and arranged as they desire? | X | | Based on on-site visit and review of the Resident Handbook, residents provide their own furniture and furnishings and may arrange them as they wish. |
| <ul style="list-style-type: none"> Do the furniture, linens, and other household items reflect the individual's personal choices? | X | | At the site visit, state staff observed that private rooms were uniquely furnished with residents' personal belongings. |
| 14. Do individuals have freedom and support to control over their schedules and activities? [42 C.F.R. § 441.301(c)(4)(vi)(C)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Do individual's schedules vary from others in the same setting? | X | | Based on on-site visit and policy review, residents were observed engaged in various activities. Residents can select daily activities of interest. The Residency Agreement, Resident Rights policy and Resident Handbook all support resident preference in selecting day to day activities. |
| <ul style="list-style-type: none"> Do individuals have access to such things as a television, radio, and leisure activities that interest them, and can they schedule such activities at their convenience? | X | | Based on on-site visit and policy review, residents were observed watching television while another group completed game of Bingo. There are large screen televisions in community area on both levels of facility. The Residency Agreement, Resident Rights policy and Resident Handbook all support resident preference in selection of day-to-day activities. Residents may choose to participate in organized activities or to engage in their own pursuits. |
| <ul style="list-style-type: none"> Are individuals able to follow their own flexible (i.e., not set) schedule for waking, bathing, eating, exercising, activities, etc.? | X | | Based on on-site visit and policy review, weekly cleaning and laundry schedule is established for each apartment. The Resident Handbook asserts that residents may provide input on days/time that works best for them. |
| 15. Are individuals able to have visitors of their choosing at any time? [42 C.F.R. § 441.301(c)(4)(vi)(D)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Are visitors welcomed and encouraged? | X | | Based on on-site visit and policy review, state staff observed visitors being welcomed upon entry to lobby. The Resident Handbook states that visitors are welcome, and the Resident Rights policy assures that residents may have visitors without restrictions so long as visitors do not pose risk to other residents. |

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| <ul style="list-style-type: none"> Is the furniture arranged as an individual prefers and does the arrangement encourage the comfort and conversation with visitors? | X | | Based on on-site visit and policy review, state staff observed community spaces, including rooms with doors, available for visits, in addition to the individual's private room. Private rooms are arranged as the individual chooses. Common spaces included comfortable furniture arranged in a manner conducive to visiting and conversation. |
| 16. Do individuals have access to food at any time? [42 C.F.R. § 441.301©(4)(vi)(C)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Do individuals have a meal at the time and place of his/her choosing? | X | | Meals in the dining room are provided at specific times as described in the Resident Handbook. The Resident Handbook asserts that food is served in the dining room, outside courtyard, or by request, on trays in the resident's apartment. Residents may also take food from the dining room to eat elsewhere. Snacks and beverages are available throughout the day in areas in the residence. Residents also have kitchenettes in their units where they may prepare food for themselves at any time. |
| <ul style="list-style-type: none"> Can individuals request an alternative meal if desired? | X | | Residents can select from three to four entrees at each meal. Based on policy review, including the Resident Handbook, resident can request an alternative meal, if desired. |
| <ul style="list-style-type: none"> Are snacks accessible and available anytime? | X | | Based on on-site visit and policy review, snacks and beverages are always accessible to residents. State staff observed snacks in refrigerators and in cupboards in common areas on both levels of building. |
| <ul style="list-style-type: none"> Can individuals sit in any seat in a dining area? (no assigned seats) | X | | Residents can choose where they sit in all dining areas. |
| <ul style="list-style-type: none"> If an individual desires to eat privately, can s/he do so? | X | | Residents may have tray service or may prepare their own food in their units. Residents may also take food from dining room to eat in their rooms. |
| 17. Do the rooms have lockable entrance doors, with individuals with only appropriate staff having keys as needed? [42 C.F.R. § 441.301(c)(4)(vi)(B)(1)] | Yes | No | Comments: |
| <ul style="list-style-type: none"> Can individuals close and lock the bedroom door? | X | | State staff observed locking doors for units on site visit. |
| <ul style="list-style-type: none"> Can individuals close and lock the bathroom door? | X | | State staff observed locking doors for bathrooms on site visit. |
| 18. Is the setting physically accessible to the individual? [42 C.F.R. § 441.301(c)(4)(vi)(E)] | Yes | No | Comments: |

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| <ul style="list-style-type: none"> Do individuals have full access to typical facilities in a home such as a kitchen, cooking facilities, dining area, laundry, and comfortable seating in the shared areas? | X | | During policy and on-site review, state staff observed each unit with cook-top, refrigerator and space for small dining set. Laundry facilities are available on both levels of building. Common spaces included comfortable furniture arranged in a manner conducive to visiting and conversation. |
| <ul style="list-style-type: none"> For those individuals who need supports to move about the setting as they choose, are supports provided, such as grab bars, seats in the bathroom, ramps for wheelchairs, viable exits for emergencies, etc.? | X | | During on-site review, state staff observed shower chairs, raised toilet seats and grab bars in bathrooms. The main entrance to The Seasons had handicap pushbutton option with ramp into main lobby. The residence is wheelchair accessible, and state staff observed a resident using a wheelchair. |
| <ul style="list-style-type: none"> Does the setting ensure that there are no gates, Velcro strips, locked doors, or other barriers preventing individuals' entrance to or exit from certain areas of the setting? | X | | During on-site review, state staff did not find gates, Velcro strips, locked doors or other barriers preventing individuals' entrance to or exit from the residence. |
| <ul style="list-style-type: none"> Is the setting physically accessible and there are no obstructions such as steps, lips in a doorway, narrow hallways, etc., limiting individuals' mobility in the setting or if they are present are their environmental adaptations such as a stair lift or elevator to ameliorate the obstruction? | X | | During on-site review, state staff did not observe obstructions that could limit mobility of residents. |
| <ul style="list-style-type: none"> Are appliances accessible to individuals (e.g., the washer/dryer are front loading for individuals in wheelchairs)? | X | | During on-site visit, state staff observed front loading washing machines and dryers. |
| <ul style="list-style-type: none"> Are tables and chairs at a convenient height and location so that individuals can access and use the furniture comfortably? | X | | During on-site visit, state staff observed furniture and counter tops in residence were of convenient height and located to maneuver in and out of comfortably. |
| 19. If the requirements of Questions 10 through 18 are not observed for a particular individual (i.e., the individual's lease agreement does not provide the same protections under Rhode Island landlord/tenant law or the individual cannot have privacy in their sleeping unit, locks, choice of roommate, freedom to decorate, control over their schedule, food at any time, visitors at any time, and/or accessibility), are modifications supported by a specific assessed need | Yes | No | Comments: |

| and justified in the person-centered plan? [42 C.F.R. § 441.301(c)(4)(vi)(F)] | | | |
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| <ul style="list-style-type: none"> Does documentation note if positive interventions and supports were used prior to any plan modifications? | X | | <p>During on-site visit, state staff reviewed service plans for the three current residents with Medicaid coverage, none of which had service plan modifications.</p> <p>The Resident Service Plan and Addendum to Service Plan includes elements required for residents with service plan modification(s).</p> <p>The Resident Service Plan policy outlines indications for modifications and instructions on how to document modifications in resident service plan.</p> <p>Modifications are also documented in the person-centered care plan completed by the conflict free case management agency.</p> |
| <ul style="list-style-type: none"> Is there documentation of less intrusive methods of meeting the need that were tried first but did not work? | X | | <p>The Resident Service Plan and Addendum to Service Plan includes elements required for residents with service plan modification(s). The Resident Service Plan policy outlines indications for modifications and instructions on how to document modifications in resident service plan.</p> |
| <ul style="list-style-type: none"> Does the plan include a clear description of the condition that is directly proportional to the specific assessed need, data, and information to support ongoing effectiveness of the intervention, time limits for periodic reviews to determine the ongoing necessity of the modification, informed individual consent, and assurance that the intervention will not cause the individual harm? | X | | <p>The Resident Service Plan and Addendum to Service Plan includes elements required for residents with service plan modification(s).</p> <p>The Resident Service Plan policy outlines indications for modifications and instructions on how to document modifications in residents service plan.</p> |