

State Rapid Response Investigative Public Report

Office of Health Facility Complaints

Maltreatment Report #: HL325872862M
Compliance #: HL325875070C

Date Concluded: July 2, 2025

Name, Address, and County of Licensee

Investigated:

The Sanctuary at West St. Paul
1746 Oakdale Avenue
West St. Paul, MN 55118
Dakota County

Facility Type: Assisted Living Facility with
Dementia Care (ALFDC)

Evaluator's Name:

Maerin Renee, RN, Special Investigator

Finding: Not Substantiated

Nature of Investigation:

The Minnesota Department of Health investigated an allegation of maltreatment, in accordance with the Minnesota Reporting of Maltreatment of Vulnerable Adults Act, Minn. Stat. 626.557, and to evaluate compliance with applicable licensing standards for the provider type.

Initial Investigation Allegation(s):

The Alleged Perpetrator (AP) financially exploited the resident when she convinced the resident to sign the resident's automobile over to her.

Investigative Findings and Conclusion:

The Minnesota Department of Health determined financial exploitation was not substantiated. The AP violated professional boundaries when she arranged a financial transaction with the resident. However, the AP paid what the resident and her family considered to be a fair price for the car. The resident did not incur a financial loss, and the incident did not meet the definition of financial exploitation.

The investigator conducted interviews with facility staff members, including administrative staff, nursing staff, and unlicensed staff. The investigator contacted family. The investigation included review of the resident records, the facility internal investigation, facility incident reports,

personnel files, and related facility policy and procedures. Also, the investigator observed resident interactions with staff.

The resident resided in an assisted living facility. The resident's diagnoses included high blood pressure, osteoarthritis, and diabetes. The resident's services included assistance with meals. The resident's assessment indicated the resident was independent with most activities.

The facility's internal investigation indicated the AP punched out of work during lunch, got into the resident's old car, picked up the resident at the front of the facility, and drove to the Department of Motor Vehicles (DMV). The AP paid the resident \$2800, and the car's ownership was transferred to the AP. The resident said she did not consider herself a vulnerable adult. She said she wanted to sell her car, so she did. Family members agreed \$2800 was a good price for the car. The resident said she was not a victim of financial exploitation.

When interviewed, a supervisor said the resident was very independent. The resident had received a new car, and one day a staff member reported she had seen the AP driving the resident from the facility in the resident's old car. After the AP and resident returned, the AP said she and the resident went to the DMV to transfer ownership of the resident's old car to the AP. The AP paid the resident \$2800, which family members, who worked in the car industry, said was a good price for the car.

When interviewed, the AP said she needed a car and entered an agreement with the resident to purchase her old one. They agreed on a price, and the resident transferred ownership of the car to the AP.

When interviewed, a family member said the resident had consulted with family about the sale of her old car, and all agreed \$2800 was a great price. The family member said the price was a much better deal for the resident than the AP.

When interviewed, the resident said she received a new car so wanted to sell her old one. The resident sold her car to the AP, not having been aware that there were rules against such transactions between residents and staff members.

In conclusion, the Minnesota Department of Health determined financial exploitation was not substantiated.

“Not Substantiated” means:

An investigatory conclusion indicating the preponderance of evidence shows that an act meeting the definition of maltreatment did not occur.

Financial exploitation: Minnesota Statutes, section 626.5572, subdivision 9

"Financial exploitation" means:

(b) In the absence of legal authority a person:

- (1) willfully uses, withholds, or disposes of funds or property of a vulnerable adult;
- (2) obtains for the actor or another the performance of services by a third person for the wrongful profit or advantage of the actor or another to the detriment of the vulnerable adult;
- (3) acquires possession or control of, or an interest in, funds or property of a vulnerable adult through the use of undue influence, harassment, duress, deception, or fraud; or
- (4) forces, compels, coerces, or entices a vulnerable adult against the vulnerable adult's will to perform services for the profit or advantage of another.

Vulnerable Adult interviewed: Yes.

Family/Responsible Party interviewed: Yes.

Alleged Perpetrator interviewed: Yes.

Action taken by facility:

The facility provided refresher training to staff regarding appropriate boundaries. The AP's employment was terminated.

Action taken by the Minnesota Department of Health:

No further action taken at this time.

cc:

The Office of Ombudsman for Long Term Care

The Office of Ombudsman for Mental Health and Developmental Disabilities

Minnesota Department of Health

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: 32587	(X2) MULTIPLE CONSTRUCTION A. BUILDING: _____ B. WING _____		(X3) DATE SURVEY COMPLETED C 06/03/2025
NAME OF PROVIDER OR SUPPLIER THE SANCTUARY AT WEST ST PAUL			STREET ADDRESS, CITY, STATE, ZIP CODE 1746 OAKDALE AVENUE WEST SAINT PAUL, MN 55118		
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE DEFICIENCY)	(X5) COMPLETE DATE	
0 000	Initial Comments On June 3, 2025, the Minnesota Department of Health initiated an investigation of complaint #HL325875070C/#HL325872862M. No correction orders are issued.	0 000	Minnesota Department of Health is documenting the State Correction Orders using federal software. Tag numbers have been assigned to Minnesota State Statutes for Assisted Living Facilities. The assigned tag number appears in the far-left column entitled "ID Prefix Tag." The state Statute number and the corresponding text of the state Statute out of compliance is listed in the "Summary Statement of Deficiencies" column. This column also includes the findings which are in violation of the state requirement after the statement, "This Minnesota requirement is not met as evidenced by." Following the evaluators' findings is the Time Period for Correction. PLEASE DISREGARD THE HEADING OF THE FOURTH COLUMN WHICH STATES,"PROVIDER'S PLAN OF CORRECTION." THIS APPLIES TO FEDERAL DEFICIENCIES ONLY. THIS WILL APPEAR ON EACH PAGE. THERE IS NO REQUIREMENT TO SUBMIT A PLAN OF CORRECTION FOR VIOLATIONS OF MINNESOTA STATE STATUTES. THE LETTER IN THE LEFT COLUMN IS USED FOR TRACKING PURPOSES AND REFLECTS THE SCOPE AND LEVEL ISSUED PURSUANT TO 144G.31 SUBDIVISION 1-3.		

Minnesota Department of Health

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE

TITLE

(X6) DATE