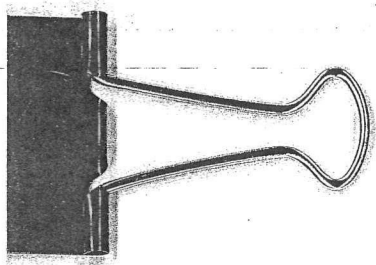


EXHIBIT 6

6a



PB # 2281

Page 1



Dear Sir or Madam,

My name is Gary Alvarez and I currently own and operate a 12 bed assisted living facility located at 7100 Rue Granville in the beautiful city of Miami Beach on Normandy Island. We have been licensed and running our operation since 26th of March 2012. We provide for our residents exceptional personal service and compassionate care. Our environment is warm, homelike and comfortable. It is designed for living with dignity, self-wellness and safety. It is my passion and dream to expand this facility based on the community's needs. I feel this will be a great project for Miami Beach that we all could be proud of giving our seniors better accommodation.

Unfortunately, Hebrew Home has closed its doors after serving the community for 40 years and due to the reply from family members telling us there is no assisted living facility on the beach apart from us we have a great reputation in the community and a great relation with agencies as AHCA and even with other assisted living facilities.

Fortunately, The Obama Care Program is taking effect at the end of December 2013 which will provide funding and give the opportunity to anyone over the age of 18 that needs assistance with daily living to stay in an assisted living facility.

Due to our demand of Miami Beach residents that are looking for a place for their loved ones that need assistance with daily living, unfortunately every day we are turning them away and this is why I feel that we need to extend our facility to 1904 Marseille Dr. Miami Beach into 19 or 21 private rooms. We will follow all guidelines and restrictions that are issued by Miami Beach and AHCA accordingly to the Rule 58A-5, Florida Administrative Code and Chapter 400 Part III, Florida Statutes for all assisted living facilities new and old or expanding. (see attachment #1) Currently 1904 Marseille Dr. is in use as a 4-plex. The construction from the outside is very similar to the existing ALF and both buildings are just next to each other in approximately 10 feet. We will convert existing 4 apartments into 19 or 21 private rooms. AHCA requirement 434.35.1 says that there shall be at least 1 bathroom with one toilet and sink per 6 residents and 1 bathtub or shower per 8 persons. We are going to have 1 bathroom with the shower for 4 residents. We want to give them a maximum comfort and privacy. Every room will be 80 square feet which is bigger than required. The requirements from AHCA say that the minimum inside measurement is 60 square feet of usable floor space per resident (section 434.3.4.2 of Florida Statutes for Assisted Living Facilities – attachment #1). We will have approximately from 700 to 800 square feet of entertainment area. Also we will have approximately 200 square feet of exercise room. We will have a common barbeque area with seating areas where they can enjoy the day.

We are going to connect those two properties by building a hallway between them so there will be direct access to go through both of buildings. Our existing common areas like dining area, living room and kitchen are big enough to keep them just like they are and handle from 31 to 33 residents to requirements and guidelines by AHCA 434.3.3 of Florida Statutes for Assisted Living Facilities. (see attachment #1)

6b



BERCOW RADELL & FERNANDEZ
ZONING, LAND USE AND ENVIRONMENTAL LAW

DIRECT LINE: (305) 377-6231
E-Mail: MLarkin@BRZoningLaw.com

VIA HAND DELIVERY

May 4, 2016

Thomas Mooney, Planning Director
Planning Department
City of Miami Beach
1700 Convention Center Drive, 2nd Floor
Miami Beach, Florida 33139

Re: Request for Modification of Conditional Use Permit Approval for the Properties
located at 1904 Marseille Drive, 7100 Rue Granville, and 1915 Normandy Drive

Dear Tom:

This firm represents Normandy Living, LLC (the "Applicant"), the contract-purchaser of the properties located at 1904 Marseille Drive, 7100 Rue Granville, and 1915 Normandy Drive (collectively, the "Property"). Please consider this the Applicant's letter of intent in support of a request to amend an existing Conditional Use Permit ("CUP") for an Adult Congregate Living Facility ("ACLF"), in order to change the owner/operator to Normandy Living, LLC and to increase the total permitted beds.

Description of the Property. The Property is located on the west side of Rue Granville between Marseille Drive in the north and Normandy Drive in the south. 1904 Marseille Drive at the north of the Property contains a 1-story, multifamily residential building with four apartment units. 7100 Rue Granville, immediately to the south, has operated as an ACLF since 1982. It currently operates as Better Living Investment, LLC (a.k.a. Normandy Estates), a 12-bed ACLF licensed and in operation for many years.¹ 1915 Normandy Drive located to the west contains a small, 1-story single-family home.

The Property is zoned Residential Multifamily, Low Density (RM-1) under the City's land development regulations. Pursuant to Section 142-153(a), the RM-1 zoning district permits ACLFs and nursing homes as conditional uses.

¹ Previously licensed as Douglas Gardens Community Mental Health Center.

The expansion onto 1904 Marseille Drive proposes an addition atop the existing structure with 22 beds. Therefore, the additional floor area triggers an off-street parking requirement of 11 spaces that cannot be satisfied through the fee-in-lieu program. In order to provide this parking, the Applicant is acquiring the 1915 Normandy Drive property for conversion into an open-air, surface parking lot with 11 parking spaces. The secured parking lot will serve only employees and guests of the residents of the facility and may not be used by the public. Residents at the facility will not be driving vehicles and will not utilize this parking area.

Conditional Use Criteria. Every conditional use application requires the Planning Board to determine an application's consistency with seven (7) criteria. Those criteria, codified in Section 118-192(a), follow below, accompanied with a description of the application's consistency with each.

- (1) The use is consistent with the comprehensive plan or neighborhood plan if one exists for the area in which the property is located.**

The project is consistent with the Comprehensive Plan, as the use is permissible within the Low Density Multifamily Residential Category (RM-1) Future Land Use designation as a Conditional Use. The project is also consistent with Housing Element Objective 4 which encourages that there be adequate sites for group homes, at approximately 20% of the City's land area.

- (2) The intended use or construction will not result in an impact that will exceed the thresholds for the levels of service as set forth in the comprehensive plan.**

The proposed project is not anticipated to exceed the Level of Service (LOS) for the surrounding area. Despite the increase in intensity, the facility will be self-contained with 11 parking spaces where none existed before, and will not impose great impact on traffic, infrastructure, or services.

- (3) Structures and uses associated with the request are consistent with these land development regulations.**

The proposed use is an Adult Congregate Living Facility, as defined by Section 114-1 of the City Code, which is allowed in the underlying zoning district as a conditional use. The use has existed at this location for decades and any physical improvements must undergo the design review approval process pursuant to the Code.

Thomas Mooney, Planning Director
May 4, 2016
Page 5

Conclusion. The Applicant proposes a thoughtful expansion of an already approved ACLF. We look forward to your favorable recommendation on our application. If you have any questions or comments, please call me at 305-377-6231.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael W. Larkin", with a horizontal line extending to the right.

Michael W. Larkin

Attachments

cc: Rick Yune
Matthew Amster, Esq.

OFF. REC. 130487-66

IT IS THEREFORE ORDERED, by the Board, that a variance(s) as requested and set forth above be granted subject to:

RELIEF REQUESTED IS GRANTED. APPLICANT HAS A NON-CONFORMING ADULT CONGREGATE LIVING FACILITY WITH 16 BEDS UNDER THE CONDITION THAT APPLICANT COMPLY WITH ALL OTHER APPLICABLE CODES.

PROVIDED, the applicant shall take all necessary steps to have permit issued by the Director of the Development Services Division within a period of two (2) years from the date hereof, otherwise this Order shall become null and void, unless the issuance of such permit is stayed by an appeal to the appropriate court. This Order does not constitute a permit, but upon presentation of this Order to the Director of the Development Services Department, a permit shall be issued in accordance and pursuant to the ordinances of the City of Miami Beach.

Dated this 23rd day of September, 1986.

ZONING BOARD OF ADJUSTMENT OF
THE CITY OF MIAMI BEACH,
FLORIDA

BY:

**RUSSELL GALBUT
CHAIRMAN**

STATE OF FLORIDA)
) SS
COUNTY OF DADE)

BEFORE ME personally appeared RUSSELL GALBUT to me well known and known to me to be the person described in and who executed the foregoing instrument, and acknowledged to and before me that he executed said instrument for the purpose therein expressed.

WITNESS my hand and official seal, this

September A.D. 1986

NOTARY PUBLIC
STATE OF FLORIDA

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. FEB. 5, 1990
BONDED THRU GENERAL INS. UND.

My commission expires

Frank Aymonin, Public Works Director
Jud Kurlancheek, Planning Director

RECORDED IN OFFICIAL RECORDS BOOK
OF DALLAS COUNTY, TEXAS.
RECORD NUMBER
RICHARD F. BRIDGES
DALLAS COUNTY

and the staff report and analysis, which is adopted herein, including staff recommendations, as modified by the Planning Board, that a Conditional Use Permit as requested and set forth above, be GRANTED subject to the following conditions to which the applicant has agreed:

1. This Conditional Use Permit is issued to Gary John Alvarez/Better Living Investment, LLC, for the expansion of the existing Assisted Living Facility. Any change of operator or 50% (fifty percent) or more stock ownership, partnership interest or the equivalent, shall require review and approval by the Planning Board as a modification to this Conditional Use Permit. Subsequent owners and operators shall be required to appear before the Board to affirm their understanding of the conditions listed herein and to obtain a Modification to this Conditional Use Permit.
2. The Planning Board shall maintain jurisdiction of this Conditional Use Permit. The Board reserves the right to modify the Conditional Use approval at the time of a progress report in a non-substantive manner, to impose additional conditions to address possible problems and to determine the timing and need for future progress reports. This Conditional Use is also subject to modification or revocation under City Code Sec. 118-194 (c).
3. The applicant shall receive all necessary approvals and licenses from all pertinent local, regional and state government agencies for this facility prior to the issuance of a Certificate of Occupancy or Certificate of Use/Business Tax Receipt, whichever may occur first.
4. The applicant shall pay to the City a yearly fee-in-lieu of providing parking of \$2,800.00. The first payment shall be due before the issuance of the Certificate of Use or Business Tax Receipt, whichever comes first.
5. The applicant shall provide to staff either a Unity of Title or a Covenant in Lieu of Unity of Title before the issuance of a TCO or CO in order to be able to connect the two properties through a hallway, as proposed.
6. A fence shall be required on the North side of the property and plans for it shall be submitted to staff for review and approval prior to the issuance of a building permit.
7. The hours of operation of the ALF shall be as requested by the applicant, 24 hours a day, seven days a week.
8. The number of beds in the expanded facility shall not exceed 21.
9. Any exterior business identification signs shall be submitted to staff for review and approval prior to approval of a building permit.
10. ALF staff shall ensure that patient behavior (noise or loitering) does not become a nuisance to surrounding property owners or tenants.
11. The applicant shall be responsible for maintaining the areas adjacent to the facility, such as the sidewalk and all the areas adjacent to and around the property, in a clean manner and clear of trash.
12. The applicant shall satisfy outstanding liens and past due City bills, if any, to the satisfaction of the City prior to the issuance of a Certificate of Use/Business Tax Receipt.
13. The conditions of approval for this Conditional Use Permit are binding on the applicant, the property owners, operators, and all successors in interest and assigns. Substantial modifications to the plans submitted and approved as part of the application, as determined by the Planning Director or designee, may require the applicant to return to the Board for approval.

**PLANNING BOARD
CITY OF MIAMI BEACH, FLORIDA**

PROPERTY: 1904 Marseille Drive

FILE NO. 2281

IN RE: The request for a Conditional Use Permit for the expansion of an existing Assisted Living Facility located at 7100 Rue Granville, pursuant to Section 142, Article V.

LEGAL DESCRIPTION: Lot 12 Block 35 Isle of Normandy Miami View Section Part 3, according to the plat thereof, recorded in Plat Book 40 Page 33 of the public records of Miami Dade-County Florida.

MEETING DATE: October 9, 2015

CONDITIONAL USE PERMIT

The applicant, Better Living Investments LLC, requested a Conditional Use Permit for the expansion of an existing Assisted Living Facility located at 7100 Rue Granville, pursuant to Section 142, Article V.

The Planning Board of the City of Miami Beach makes the following FINDINGS OF FACT, based upon the evidence, information, testimony and materials presented at the public hearing and which are part of the of the record for this matter:

That the property in question is located in the RM-1, Residential Multifamily Low Intensity Zoning District;

That the use is consistent with the Comprehensive Plan for the area in which the property is located;

That the intended use or construction will not result in an impact that will exceed the thresholds for the levels of service as set forth in the Comprehensive Plan;

That structures and uses associated with the request are consistent with the Land Development Regulations;

✓ That the public health, safety, morals, and general welfare will not be adversely affected;

That necessary safeguards will be provided for the protection of surrounding property, persons, and neighborhood values.

IT IS THEREFORE ORDERED, based upon the foregoing findings of fact, the evidence, information, testimony and materials presented at the public hearing, which are part of the record for this matter, and the staff report and analysis, which is adopted herein, including the staff recommendations, that the Conditional Use Permit be GRANTED, as provided below:

1. This Conditional Use Permit is issued to Better Living Investment, LLC, for the expansion of an existing Assisted Living Facility. Subsequent owners and operators shall be required to appear before the Board to affirm their understanding of the conditions listed herein and to obtain a Modification to this Conditional Use Permit.

MB

15. The establishment and operation of this modified Conditional Use shall comply with all the aforementioned conditions of approval; non-compliance shall constitute a violation of the Code of the City of Miami Beach, Florida, and shall be subject to enforcement procedures set forth in Section 114-8 of said Code and such enforcement procedures as are otherwise available. Any failure by the applicant to comply with the conditions of this Order shall also constitute a basis for consideration by the Planning Board for a revocation of this Conditional Use.
16. Nothing in this order authorizes a violation of the City Code or other applicable law, nor allows a relaxation of any requirement or standard set forth in the City Code.

Dated this 20th day of APRIL, 2016.

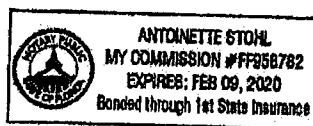
PLANNING BOARD OF THE
CITY OF MIAMI BEACH, FLORIDA

BY: Michael Belush

Michael Belush, Planning and Zoning Manager
For Chairman

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

The foregoing Instrument was acknowledged before me this 20th day of APRIL, 2016, by Michael Belush, Planning and Zoning Manager of the City of Miami Beach, Florida, a Florida Municipal Corporation, on behalf of the corporation. He is personally known to me.



Notary: Antoinette Stohl
Print Name ANTOINETTE STOHL
Notary Public, State of Florida
My Commission Expires:
Commission Number:

[NOTARIAL SEAL]

Approved As To Form:
Legal Department

for it back

bc

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

OPERATIONAL PLAN

Executive Summary

NORMANDY LIVING, LLC offers a residential facility licensed by the State of Florida. Normandy Living will focus on providing restorative stabilization in a social setting environment. Our philosophy is that of a compassionate and professional source of healing, hope, and transformation for anyone in need of care. Our staff of certified professionals will deliver the highest standard of care. We believe in providing our individuals with compassion, dignity, and respect. Our holistic approach uses evidence-based practices for the body, mind and spirit to meet individual outcomes.

Resident Programming

Operational Hours

The facility will operate 24 hours per day, 7 days per week, and 365 days per year.

Admittance

Individuals qualified are adults aged 18 and over, both male and female, who have been assessed by health care. **Individuals who are medically compromised and/or have been diagnosed with significant mental or health issues will be referred to Mount Sinai Hospital.** Normandy Living does not discriminate based on sex, race, color, religion, creed, or sexual orientation.

Programming Activities

Those admitted will receive an orientation and introduction to educational and self-help programs. Individuals will be required to participate in daily holistic programs that include physical wellness, educational programs, and mentoring on their next steps to ensure positive stays.

At intake each resident will meet with Staff and Resident Director to assess Individual Resident Protocols ("IDP") received from their Medical Director, whose commercial office is not located at the facility. Medical director will comply with Department of Children and Families residential detoxification standards. The IDP and residential detoxification services will include support for daily living and hygiene, checking of vitals, monitoring medications, progress assessments, health consciousness, mental health and positive mind set awareness. Staff and Resident Director will monitor resident IDP progress. Check-ups for progress monitoring will be supported for outcome reports.

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

OPERATIONAL PLAN

Dining Hours

Daily meals will be served as follows:

Breakfast	8:00 AM – 8:30 AM
Lunch	12:00PM – 1:00 PM
Dinner	5:00 PM – 6:00 PM
Snacks and Beverages	Available 24/7

Typical Schedule of Daily Activities

6:00 to 8:00 am	wake-up, personal hygiene, administration, clean room
8:00 to 8:30 am	breakfast
8:30 to 9:00 am	morning meetings
9:15 to 10:30 am	group activity
10:45 to 11:45 am	men's workshops / women's recreation
12:00 to 1:00 pm	lunch
1:15 to 2:15 pm	educational programming
2:30 to 3:30 pm	educational programming
3:45 to 4:45 pm	men's recreation / women's workshops
5:00 to 6:00 pm	dinner
6:15 to 7:15 pm	evening workshop
7:30 to 8:45 pm	group activities / exercise options
9:00 to 11:00 pm	individual and group evening residential activities
11:00 pm	lights out

Facility Operations

Staffing

Professional staff will be available Monday through Saturday. Support staff will be present 24/7.

Every employee will have the prerequisite qualifications and credentials as required by the scope of their service. Security Guards will hold a Florida Security license. All staff will be trained as required by regulations, including in the following areas:

- Universal Precautions
- Exposure Control

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

OPERATIONAL PLAN

Transportation / Offsite Programs & Services

Transportation to off-site services will be provided by the program as necessary.

Onsite Parking

The parking plan will be as designed on the proposed site plan. Residents will not be permitted to bring their vehicles. The onsite parking facility will only be utilized by employees and guests of residents.

Safety and Security

Access will be through the main lobby to the receptionist. All guests will be required to sign in and show identification.

No Loitering Policy – once admitted, residents will not be permitted to loiter outside the property.

Card Reader System – electronic card readers will be located at all access points and access cards will be necessary in order to gain entry into and out of the facility.

Security cameras – security monitoring cameras will be installed throughout the property including in the hallways.

A fire alarm system will be installed throughout the property and all fire safety requirements will comply with state and local law.

Security guards are present 24 hours a day, 7 days a week, with a minimum of 2 security staff at nighttime and 3 guards present during the day. Security guard responsibilities include securing and monitoring the property, assisting with resident admissions, performing routine patrols of the property, monitoring the parking area, and responding to specific requests for assistance.

Regulatory Compliance

Normandy Living, LLC and its staff will attain all required State and City licensing necessary to provide its services and will comply with all governmental occupational regulations and codes.

6d

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

OPERATIONAL PLAN

Executive Summary

NORMANDY LIVING, LLC offers a residential facility licensed by the State of Florida. Normandy Living will focus on providing restorative stabilization in a social setting environment. Our philosophy is that of a compassionate and professional source of healing, hope, and transformation for anyone in need of care. Our staff of certified professionals will deliver the highest standard of care. We believe in providing our individuals with compassion, dignity, and respect. Our holistic approach uses evidence-based practices for the body, mind and spirit to meet individual outcomes.

Resident Programming

Operational Hours

The facility will operate 24 hours per day, 7 days per week, and 365 days per year.

Admittance

Individuals qualified are adults aged 18 and over, both male and female, who have been assessed by health care. **Individuals who are medically compromised and/or have been diagnosed with significant mental or health issues will be referred to Mount Sinai Hospital.** Normandy Living does not discriminate based on sex, race, color, religion, creed, or sexual orientation.

Programming Activities

Those admitted will receive an orientation and introduction to educational and self-help programs. Individuals will be required to participate in daily holistic programs that include physical wellness, educational programs, and mentoring on their next steps to ensure positive stays.

At intake each resident will meet with Staff and Resident Director to assess Individual Resident Protocols ("IDP") received from their Medical Director, whose commercial office is not located at the facility. Medical director will comply with Department of Children and Families residential detoxification standards. The IDP and residential detoxification services will include support for daily living and hygiene, checking of vitals, monitoring medications, progress assessments, health consciousness, mental health and positive mind set awareness. Staff and Resident Director will monitor resident IDP progress. Check-ups for progress monitoring will be supported for outcome reports.

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

OPERATIONAL PLAN

Close attention will be paid to compliance with substance abuse treatment, medical care, psychiatric care, mental health treatment. Level of service will be consistent with RM-1 Zoning District. **Hospitals services will not be offered on-site.** Medical and commercial offices will not be on site.

In addition to personal development, residents will also participate in a variety of recreational and social activities. These services include but are not limited to exercise programs, yoga, meditation, reiki, arts and crafts programs, music appreciation, etc. Individuals will have access to television, internet, email, and phone usage. The social program will take place in the common use rooms designed into the facility.

The Residential Director and staff will monitor daily activity schedule. When leaving Normandy Living, individuals will be referred to future substance abuse treatment, rehabilitation, medical services, mental health services, and counseling services if needed as offered by commercial offices not located at the facility. **This will be a secured facility. Residents are not allowed to go out of the facility. If a resident wants to terminate services the facility will provide transportation to his/her destination outside of the neighborhood and RM-1 Zoning District.**

Housing

Each bedroom is designed to house no more than two residents, with a private bathroom in each bedroom. Normandy Living will foster peer support for community-based interaction. Each resident will have his/her own single-sized bed, desk, chair, lamp, dresser, mirror, and a secure area to lock personal belongings.

Dining & Nutrition

Most residents have not only neglected their physical, spiritual, and mental health, but also their nutritional health. A nutritious meal plan will include three healthy, well balanced meals each day. These meals will be delivered to the property by an off-site food service vendor. In addition, fresh, healthy snacks and beverages will be available 24 hours a day.

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

OPERATIONAL PLAN

Dining Hours

Daily meals will be served as follows:

Breakfast	8:00 AM – 8:30 AM
Lunch	12:00PM – 1:00 PM
Dinner	5:00 PM – 6:00 PM
Snacks and Beverages	Available 24/7

Typical Schedule of Daily Activities

6:00 to 8:00 am	wake-up, personal hygiene, administration, clean room
8:00 to 8:30 am	breakfast
8:30 to 9:00 am	morning meetings
9:15 to 10:30 am	group activity
10:45 to 11:45 am	men's workshops / women's recreation
12:00 to 1:00 pm	lunch
1:15 to 2:15 pm	educational programming
2:30 to 3:30 pm	educational programming
3:45 to 4:45 pm	men's recreation / women's workshops
5:00 to 6:00 pm	dinner
6:15 to 7:15 pm	evening workshop
7:30 to 8:45 pm	group activities / exercise options
9:00 to 11:00 pm	individual and group evening residential activities
11:00 pm	lights out

Facility Operations

Staffing

Professional staff will be available Monday through Saturday. Support staff will be present 24/7.

Every employee will have the prerequisite qualifications and credentials as required by the scope of their service. Security Guards will hold a Florida Security license. All staff will be trained as required by regulations, including in the following areas:

- Universal Precautions
- Exposure Control

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

OPERATIONAL PLAN

- HIV
 - CPR
 - First Aid
 - De-escalation techniques
-

Staffing Levels

Professional Staff: Approximately 15 full-time staff, with additional part-time and after hours support staff as needed.

Security Guards: Security is staffed 24 hours a day, 7 days a week, 365 days a year. There will be a minimum of 2 security staff at night time and 3 during the day time to assist with admissions.

Housekeeping staff: 2 per shift

The employees will work in shifts as follows:

Facility Staff: 6:00 AM – 4:00 PM
 4:00 PM – 12:00 AM
 7:00 PM – 7:00 AM

Professional Staff 8:00 AM – 5:00 PM
 1:00 PM – 10:00 PM

Security Guards 6:00 AM – 4:00 PM
 4:00 PM – 12:00 AM
 7:00 PM – 7:00 AM

Housekeeping, Maintenance, Deliveries and Collections

All linens, towels, and laundry will be maintained by the facility. Rooms and building will be cleaned daily.

Deliveries and significant maintenance will be done during normal business hours.

Garbage pickup will occur daily as needed. Recycling of all paper and plastic goods will be mandatory.

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

OPERATIONAL PLAN

Transportation / Offsite Programs & Services

Transportation to off-site services will be provided by the program as necessary.

Onsite Parking

The parking plan will be as designed on the proposed site plan. Residents will not be permitted to bring their vehicles. The onsite parking facility will only be utilized by employees and guests of residents.

Safety and Security

Access will be through the main lobby to the receptionist. All guests will be required to sign in and show identification.

No Loitering Policy – once admitted, residents will not be permitted to loiter outside the property.

Card Reader System – electronic card readers will be located at all access points and access cards will be necessary in order to gain entry into and out of the facility.

Security cameras – security monitoring cameras will be installed throughout the property including in the hallways.

A fire alarm system will be installed throughout the property and all fire safety requirements will comply with state and local law.

Security guards are present 24 hours a day, 7 days a week, with a minimum of 2 security staff at nighttime and 3 guards present during the day. Security guard responsibilities include securing and monitoring the property, assisting with resident admissions, performing routine patrols of the property, monitoring the parking area, and responding to specific requests for assistance.

Regulatory Compliance

Normandy Living, LLC and its staff will attain all required State and City licensing necessary to provide its services and will comply with all governmental occupational regulations and codes.

be

MIAMIBEACH

Operational Plan Review

Normandy Living, LLC ACLF

1904 Marseille Dr. / 7100 Rue Granville / 1915 Normandy Dr.

15 August 2016

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Introduction

This report summarizes the review of Normandy Living, LLC's application documents (referred to as the "Plan" throughout the report), relative to standard operating procedures for this facility type and codes and/or regulations noted by Miami Beach. The Reviewers tested the assumptions provided by Normandy Living, LLC using available industry standards, and local and state regulatory requirements.

The Plan documentation included:

- Application Documents
- Operational Plan
- Proposed Plans
- Supplemental Renderings and Plans

After reviewing all the documentation and participating on a call with the Applicant, additional information was requested from the Applicant and the City of Miami Beach.

From the Applicant:

- Policies and procedures
- Licensure/Certification(s) under which the facility intends to operate

From the City of Miami Beach:

- Clarification relative to the classification of the facility type

At this time, the Reviewer is still waiting for some of the additional information. The observations and conclusions included here are based only on the information provided to date.

Observations

Facility Type

It remains unclear under which facility type the Plan should be reviewed. The available definitions for Adult Congregate Living Facilities and/or Assisted Living Facilities do not align with the information in the Plan.

Operational Plan

In general, the Plan aligns with acceptable industry practices and is indicative of services offered in non-acute settings. Specific operational policies and procedures need further definition.

Physical Plan

The physical plan is not in complete compliance with sections of the City of Miami Beach Code. The number of beds requested exceed the suggested number for the facility type designated on the application. The dining and community space appears to be insufficient for the number of residents.

Context

Application Highlights

Property

There are three properties included in the application. They are zoned Residential Multifamily, Low Density (RM-1).

- 1904 Marseille Drive: 1-story, multifamily residential building with four apartment units
- 7100 Rue Granville: 12-bed Assisted Living Facility operated by Better Living Investment, LLC
- 1915 Normandy Drive: 1-story, single family home

The current owner previously obtained a CUP to expand the 12-bed ACLF into the adjacent property; converting the multifamily residential building to achieve a 21-bed facility.

In this application, the Applicant proposes the following:

- 1904 Marseille Drive: Convert existing building for 22-beds and add a second floor with 22 additional beds for a total complement of 44 beds
- 7100 Rue Granville: Maintain existing 12-beds
- 1915 Normandy Drive: Convert to open-air, surface parking

Use

The proposed use is described as short-term (4-14 days), drug and alcohol detox center.

Operations

The facility will operate 24 hours per day, 7 days per week, and 365 days per year.

Residents will be screened and those who are medically compromised and/or have been diagnosed with significant mental or health issues will be referred to Mount Sinai Hospital. Admitted residents will be placed on a protocol for treatment including, in most cases, pharmaceuticals to manage the detox process.

Residents will participate in counseling and other activities. Three meals per day will be served and snacks available 24/7. Food will be prepared off-site and delivered to the facility.

For the duration of their treatment, residents are restricted to the facility. Transportation will be provided for residents leaving the facility to assure they do not loiter in the residential neighborhood.

Staff

Staffing levels appear to align with industry standards. Policies and procedures are needed to clarify staff definitions and numbers per each shift.

- Professional Staff: Approximately 15 full-time staff, with additional part-time and after hours support staff as needed.
- Security Guards: Security is staffed 24 hours a day, 7 days a week, 365 days a year. There will be a minimum of 2 security staff at night time and 3 during the day time to assist with admissions.
- Housekeeping staff: 2 per shift

Applicable Statutes / Regulations / Standards

The Plan facility must comply with the statutes and regulations of The City of Miami Beach and the State of Florida. Applicable statutes and Codes are provided in the Appendix for reference.

Conclusions

The Reviewers observations reinforce the conclusion that additional information is needed. The information provided does not support review of the Plan as an ACLF, there is insufficient information to clearly understand staffing and operations, and the drawings do not provide sufficient information to assess basic building standards.

Facility Type

The Applicant has applied for conditional use as an Adult Congregate Living Facility (ACLF). While this classification exists in the City of Miami Beach Code, within the Florida Statutes, it falls under the broader definition of Assisted Living Facility (ALF). The chart below outlines key components of each type, relative to the referenced codes and standards. As written, ACLF and ALF are intended for long term, living and not short term treatment. The special provisions allowed by the State reinforce that notion, as they specifically allow residents to "age in place."

	Miami Beach	Florida	AHCA
Designation	ACLF	ALF	ALF
Description	One or more personal services provided for a period exceeding 24 hours	Full-time living arrangements in the least restrictive and most home-like setting with basic services	Personal care services in the least restrictive and most home-like environment
License	Any state licensed institution that provides for a period exceeding 24 hours, one or more personal services	All assisted living facilities (ALF) must obtain and maintain a standard license from the Agency for Health Care Administration (AHCA) Assisted Living Unit. Extended Congregate Care: expanded service, not including 24-hour nursing services Limited Mental Health: limited mental health services Limited Nursing Services does not include 24-hour nursing supervision	Standard license: routine personal care services Specialty licenses: allow "age in place"
No. of Beds	6 to 16	N/A	1 to Several Hundred
Length of Stay	Exceeding 24 hours	Full-time living	

The Plan provided by the Applicant does not align with definitions of Adult Congregate Living Facility (ACLF) or of Assisted Living Facility (ALF). While the Plan does not fit the definition of Crisis Stabilization Units (CSU), the operational information provided more closely resembles that of a CSU.

Operational Plan

Initial observations are noted below. Policies and procedures need to be reviewed for specifics.

1. Is not indicative of a hospital, medical office building, or other healthcare facility
2. Aligns with general industry practices.
3. Is not defined at a sufficient detail to determine specific operational thresholds.

Physical Plan

1. Several items in the City of Miami Beach Code: Subpart A – GENERAL ORDINANCES, Chapter 58 – HOUSING, DIVISION 3. – MINIMUM STANDARDS Sec. 58-296. - Adult congregate living facilities are not able to be assessed due to lack of Plan detail.
 - a. Sprinkler systems in halls and bedrooms
 - b. Smoke detectors in bedrooms
 - c. Infrastructure compliance (heating, ventilation, air-conditioning, IT, etc.)
 - d. Total size of dining and recreation areas (note: submitted drawings do not appear to have sufficient space)
 - e. Availability of staff personnel
2. The Plan is in accordance with City of Miami Beach Code: Subpart B - LAND DEVELOPMENT REGULATIONS, Chapter 118 - ADMINISTRATION AND REVIEW PROCEDURES, ARTICLE IV. - CONDITIONAL USE PROCEDURE, Sec. 118-192. - Review guidelines.
3. The Plan does not fully comply with City of Miami Beach Code: Subpart B - LAND DEVELOPMENT REGULATIONS, Chapter 142 - ZONING DISTRICTS AND REGULATIONS, ARTICLE V. - SPECIALIZED USE REGULATIONS, DIVISION 2. - ADULT CONGREGATE LIVING FACILITIES, Sec. 142-1253. - Review criteria.
 - a. It does not exceed the 2,000 beds per 100,000 population. There are currently 114 beds in the City of Miami Beach and a census population of 87,779.
 - b. It exceeds the recommended 16 residents per facility.

Appendix

Referenced Statutes and Codes

Miami Beach Zoning

ASSISTED LIVING FACILITIES (ALF) - Pursuant to Sec. 142-1252, adult congregate living facilities are subject to the following mandatory requirements and reviewed under the Conditional Use procedure:
State of Florida

Subpart A – GENERAL ORDINANCES, Chapter 58 – HOUSING, DIVISION 3. – MINIMUM STANDARDS

Sec. 58-296. - Adult congregate living facilities.

- (a) In addition to the property maintenance standards set forth in this article, adult congregate living facilities (ACLF) must comply with the requirements of subsections (b)–(k) of this section, which shall control in case of conflict.
- (b) Facilities must be in conformance with all provisions of the South Florida Building Code, Fire Code, and the H.R.S. Fire Safety Standards for adult congregate living facilities.
- (c) All facilities with enclosed hallways shall have sprinkler systems in hallways and bedrooms.
- (d) Smoke detectors are required in each bedroom.
- (e) All bedrooms, dining and indoor recreation areas shall be heated and air conditioned.
- (f) All facilities of more than two floors shall have an elevator large enough to carry a stretcher 76 inches by 24 inches in a horizontal position.
- (g) Each bedroom and bathroom shall have emergency call buttons.
- (h) A bathroom shall be provided for each two ACLF units.
- (i) Units including bedrooms, bathrooms and closets shall be a minimum of 200 square feet for the first two occupants in each unit; for each additional person, another 100 square feet shall be added excepting facilities with valid city and H.R.S. licenses as ACLF's as of June 25, 1983.
- (j) Each communal area for eating and recreation shall each be no less than 20 square feet per person; such areas may be contiguous to one another.
- (k) Facilities must be in conformance with state department of children and family services guidelines regarding availability of staff personnel on the premises.

Subpart B - LAND DEVELOPMENT REGULATIONS, Chapter 114 - GENERAL PROVISIONS

Sec. 114-1. - Definitions.

Adult congregate living facility means any state licensed institution, building, residence, private home, boarding home, home for the aged, or other place whether operated for profit or not, which undertakes through its ownership or management to provide for a period exceeding 24 hours, one or more personal services for four or more adults, not related to the owner or administrator by blood or marriage, who require such services. A facility offering personal services for fewer than four adults shall be within the meaning of this definition if it holds itself out to the public to be an establishment which regularly provides such services.

Subpart B - LAND DEVELOPMENT REGULATIONS, Chapter 118 - ADMINISTRATION AND REVIEW PROCEDURES, ARTICLE IV. - CONDITIONAL USE PROCEDURE

Sec. 118-192. - Review guidelines.

- a) Conditional uses may be approved in accordance with the procedures and standards of this article provided that:
- (2) The use is consistent with the comprehensive plan or neighborhood plan if one exists for the area in which the property is located.
 - (3) The intended use or construction will not result in an impact that will exceed the thresholds for the levels of service as set forth in the comprehensive plan.
 - (4) Structures and uses associated with the request are consistent with these land development regulations.
 - (5) The public health, safety, morals, and general welfare will not be adversely affected.

- (6) Adequate off-street parking facilities will be provided.
- (7) Necessary safeguards will be provided for the protection of surrounding property, persons, and neighborhood values.
- (8) The concentration of similar types of uses will not create a negative impact on the surrounding neighborhood. Geographic concentration of similar types of conditional uses should be discouraged.

Subpart B - LAND DEVELOPMENT REGULATIONS, Chapter 142 - ZONING DISTRICTS AND REGULATIONS, ARTICLE V. - SPECIALIZED USE REGULATIONS, DIVISION 2. - ADULT CONGREGATE LIVING FACILITIES

Sec. 142-1252. - Mandatory requirements.

Adult congregate living facilities shall be subject to the following mandatory requirements:

- (1) The total number of adult congregate living facility beds in the city of shall not exceed 2,000 per 100,000 permanent residents or fraction thereof. The population as determined by the U.S. Census Bureau shall be the official figure in determining the number of persons residing in the city.
- (2) Facilities shall not be located in any designated redevelopment area or MXE mixed use entertainment district.
- (3) The design of the building shall be reviewed under the design review process pursuant to chapter 118, article VI.
- (4) The entire building shall conform with the South Florida Building Code, fire prevention and safety code, and with the city property maintenance standards. If it is a historic structure, it shall also conform with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures, U.S. Department of the Interior (revised 1983), as amended.

Sec. 142-1253. - Review criteria.

Adult congregate living facilities shall be in substantial compliance with the following review criteria as determined by the planning board and when applicable by the city commission:

- (1) Smaller scale (six to 16 residents) facilities are encouraged in order to provide a noninstitutional environment.
- (2) The city should encourage equal distribution of facilities serving various income groups.
- (3) Facilities located in newly constructed buildings should be encouraged.
- (4) The location of facilities should be compatible with the city's comprehensive plan and all other adopted neighborhood plans.
- (5) In order to encourage geographic distribution, facilities should not be located within 1,500 feet from another facility.

2016 Florida Statutes

Facility/Provider Definitions

Assisted Living Facility – Assisted living facilities (ALF) provide full-time living arrangements in the least restrictive and most home-like setting. The basic services include, but are not limited to: housing and nutritional meals; help with the activities of daily living, like bathing, dressing, eating, walking, physical transfer, giving medications or helping residents give themselves medications; arrange for health care services; provide or arrange for transportation to health care services; health monitoring; respite care; and social activities. Assisted living facilities are licensed and surveyed by the State of Florida.

Bed Types:

- **Extended Congregate Care (ECC)** – An ALF with ECC beds may keep residents who become frailer than would normally be permitted in order for the resident to age in place. For example the facility can provide total help with bathing, dressing, grooming and toileting, and can provide or arrange for rehabilitative services, along with other services. However, this does not include 24-hour nursing services.
- **Optional State Supplementation (OSS)** – The OSS listing refers to the number of beds available for residents receiving Optional State Supplementation. This is a cash assistance program provided through the Florida Department of Children and Families. It adds to a person's income to help pay for costs in an assisted living facility, mental health residential treatment facility or an adult family care home. To read

more about Optional State Supplementation, and other funding sources, view the Florida Department of Elder Affairs website.

- Private– Private Beds refers to the beds available for private pay residents.

Assisted Living Facility (ALF) Specialty Licenses:

- Extended Congregate Care (ECC) – An ALF with this license can provide extended congregate care services (defined above, under Bed Types).
- Limited Mental Health (LMH) – An ALF with this license can provide limited mental health services. This type of license must be obtained if an assisted living facility serves three or more mental health residents. Services must be provided for the special needs of these residents, along with the basic services of an assisted living facility. A facility with a limited mental health license must consult with the resident and the resident's mental health case manager to develop and carry out a community living support plan.
- Limited Nursing Services (LNS) - An ALF with this license offers some limited nursing services as defined by law, but does not include 24-hour nursing supervision.

Agency for Healthcare Administration AHCA

Assisted Living Facility (ALF)

An assisted living facility (ALF) is designed to provide personal care services in the least restrictive and most home-like environment. These facilities can range in size from one resident to several hundred and may offer a wide variety of personal and nursing services designed specifically to meet an individual's personal needs.

Facilities are licensed to provide routine personal care services under a "Standard" license, or more specific services under the authority of "Specialty" licenses. ALFs meeting the requirements for a Standard license may also qualify for specialty licenses. The purpose of "Specialty Licenses" is to allow individuals to "age in place" in familiar surroundings that can adequately and safely meet their continuing healthcare needs.

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NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

ADDENDUM

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Policy and Procedure

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NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

SUBJECT: NURSING ADMISSION

POLICY: It is the policy of NORMANDY LIVING to have all the clients assessed by the nurse.

PURPOSE: To verify client's appropriateness for admission by taking medical history and psychiatric history, substance abuse history, treatment history, and develop a nursing diagnoses and with a tentative admission diagnoses.

PROCEDURE:

1. Once the Admissions Department completes their portions of the admission process, the client is brought to the admitting nurse.
2. The nurse explains consent forms and has client sign a consent for services and a consent for photographs.
3. The client is give written explanation and copy of the Advance Directive Health Care Proxy and a copy of The Patient Bill of Rights.
4. A kardex is completed noting the following: allergies, date of birth, age, marital status, last drink, last drug, BAC and GAF.
5. The client's vital signs are taken which are noted on the flow sheet and admission sheet.
6. Nurse interviews client following the nursing assessment.
7. Nurse then institutes appropriate care plans and reviews these with the client and has client sign them
8. The nurse reviews all prescriptions brought in by the client. The identity of prescriptions brought by clients must be verified and expiration dates confirmed.

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

SUBJECT: TRIAGE SHEET

POLICY: It is the policy of NORMANDY LIVING to have a means for obtaining pertinent medical information on all clients.

PURPOSE: To ensure accurate and efficient assessment of all clients.

PROCEDURES:

1. Triage nurse begins triage sheet on each new client upon arrival to facility. Vital signs, medical history, substance usage history is obtained to determine admission to facility.
2. Admitting nurse will utilize all information obtained on the Triage Sheet for admission documentation purposes, i.e. Prioritized Assessed needs, Care Plan, ASAM.
3. Nurse Practitioner will utilize all the information on Triage Sheet during admission History & Physical to determine client diagnoses.

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

SUBJECT: ADMITTING PROCESS

POLICY: It is the policy of NORMANDY LIVING to admit clients through the rear (north) entrance of the building.

PURPOSE: To provide an admissions process that protects client confidentiality and treats clients with dignity and respect.

PROCEDURE:

1. The transportation driver will make an attempt to stagger his arrival time to avoid arrival at Normandy Living during lunch period or scheduled client break periods
2. Transportation driver will notify the Admissions Department approximately (5) minutes before arrival at Normandy Living with schedule admission.
3. Admission Representative will immediately proceed to the Admissions Department.
4. Transportation driver will bring client to rear lobby entrance where Admission Rep will be waiting.
5. Transportation driver will remain in full view of the van at all times and be available to move the vehicle in the event of an emergency.
6. The vehicle will be removed from the area immediately on completion of dropping off the client(s).
7. Admission Representative will do pre-admission paperwork in the Admission Room.

NORMANDY LIVING, LLC
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SUBJECT: TRANSFER OF CLIENT TO ALTERNATIVE LEVEL OF CARE

POLICY: It is the policy of NORMANDY LIVING to arrange for or provide transportation efficiently and safely to an alternative level of care when deemed necessary.

PURPOSE: To ensure the most efficient and timely transfer from Normandy Living to alternative level of care when deemed necessary.

PROCEDURE:

1. Client is deemed, by physician, inappropriate for admission or during treatment requires alternative level of care.
2. Department which makes recommendations will notify Admissions of need for alternative level of care.
3. In emergency situations see Policy & Procedure – Transfer of Client for Emergency Treatment.
4. If medically unstable, the nurse will remain with client until transported. Transportation will be arranged at earliest possible time.
5. If Normandy Living driver transports client and client is deemed intoxicated, a staff member shall accompany in transfer.
6. Medical Director/Executive Director is to be notified of all transports to alternative level of care.

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

SUBJECT: TRANSFER OF CLIENT TO ALTERNATIVE ACUTE LEVEL OF CARE

POLICY: It is the policy of NORMANDY LIVING to arrange for or provide transportation efficiently and safely to a hospital when deemed necessary for medical or psychiatric care.

PURPOSE: To ensure the most efficient and timely transfer from Normandy Living to hospital when deemed necessary.

PROCEDURE:

1. Client is assessed by nursing staff to be inappropriate for treatment at Normandy Living for their acute medical and psychiatric need.
2. In emergencies, see Policy & Procedure - Transfer of Client for Emergency Treatment.
3. If medically unstable, the nurse will remain with client until transported. Transportation will be arranged at earliest possible time.
4. If Normandy Living driver transports client and client is unstable, a staff member shall accompany in transfer.
5. Medical Director/Executive Director is to be notified of all transports to hospital.

NORMANDY LIVING, LLC
1904 Marseille Drive / 7100 Rue Granville / 1915 Normandy Drive

SUBJECT: TRANSFER OF CLIENT FOR EMERGENCY TREATMENT

POLICY: It is the policy of NORMANDY LIVING to provide expeditious and efficient transportation in the event of a medical emergency.

PURPOSE: To ensure that the client is transported in the most efficient manner to the hospital for emergency treatment.

PROCEDURES:

1. When a medical emergency presents itself nursing is contacted.
2. The nurse assesses the situation and determines if there is a need for an ambulance. The nurse/staff calls the front desk or aide and requests that an ambulance be called.

MIAMI BEACH POLICE 911 FOR AMBULANCE!!!

3. When the nurse/staff calls for the ambulance, reception(ist) must find out how old the client is, male or female, what is the nature of the emergency and anything else that might be helpful for the ambulance.
4. The front desk or aide will notify either maintenance or security to have the side gate opened to allow access for the ambulance.

NORMANDY LIVING, LLC
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SUBJECT: VIOLENCE PREVENTION

POLICY: It is the policy of NORMANDY LIVING to prevent and provide appropriate response to incidents of potential violence.

PURPOSE: To provide an environment of care which minimizes the potential for violence and creates a safe and secure setting for clients, staff and the surrounding neighborhood.

PROCEDURES:

1. Scheduled trainings/in-services on violence prevention and response will be given to all staff members. Upon hiring, all staff will receive in-service training as part of orientation.
2. Careful assessment, and possible denial of admission, will be done on the following:
 - a) Clients with a history of violent crime including murder, rape, sexual assault, and crimes involving weapons and arson.
 - b) Clients with psychiatric conditions whose symptoms indicate violent or potentially violent behavior.
 - c) Clients whose behavior or statements indicate the threat of violent behavior.
3. A written statement will be signed by each client on admission declaring that the client is not in possession of contraband which includes alcohol, drugs, drug paraphernalia, weapons, or instruments to be used as weapons and filed in client's clinical record.
4. Clients who are assessed to be a threat to the safety of other clients, staff or the surrounding neighborhood will be discharged immediately and transported out of the facility and surrounding neighborhood to an appropriate facility or care of a party responsible for the client, such as a family member.
5. A prudent number of staff members – to be determined by clinical supervisor on duty – will be in attendance with a client who is being discharged at staff request (ASR) until the client is no longer on Normandy Living property or surrounding neighborhood.

NORMANDY LIVING, LLC
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SUBJECT: ROOM SEARCHES

POLICY: It is the policy of NORMANDY LIVING to conduct routine room searches at various times or as indicated by client behavior.

PURPOSE: To maintain an alcohol and drug free environment and surrounding neighborhood, and to protect the therapeutic integrity of the facility for clients who truly wish to remain abstinent from chemicals. Also for infection control purposes, Normandy Living needs to ensure that no food items are stored that may spoil or attract insects and rodents.

PROCEDURE:

1. Room searches will be conducted on an ongoing basis randomly every week. Room searches may occur no more than every 30 minutes throughout the week.
2. Room searches will always be conducted by two (2) designated Normandy Living employees.
3. Designated employees will be instructed which rooms to search by Executive Director.
4. Designated employees will thoroughly search rooms (i.e., closets, drawers, bathrooms, all applicable areas)
5. When contraband is found in any inconspicuous area Security must be notified.
6. All contraband found will be given to Security or Nurse Staff.
7. Departments will take appropriate action depending upon type of contraband found to include counseling or when applicable management team will become involved.
8. Any food found will be discarded.
9. Any personal items such as radios and books will be confiscated and given back at the time of discharge.