



**Mississippi Department of Mental Health Home and Community-Based Services  
Heightened Scrutiny Evaluation**

*Summary Sheet*

|                                      |                                       |
|--------------------------------------|---------------------------------------|
| <b>Provider Name</b>                 | Mississippi Christian Family Services |
| <b>Setting Name</b>                  | Day Services - Adult                  |
| <b>Setting Address</b>               |                                       |
|                                      | Rolling Fork, Mississippi, 39159      |
| <b>Original Site Assessment Date</b> | November 29, 2018                     |
| <b>Validation Date</b>               | June 29, 2020                         |

**Setting Type**

- Supervised Living
- Shared Supported Living
- Supported Living
- Day Services Adult / Day Habilitation
- Prevocational Services
- Community Respite

**Heightened Scrutiny Category**

- Located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment (such as a hospital, nursing facility, ICF/IID, or IMD);
- Located in a building on the grounds of, or adjacent to, a public institution; or
- Has the effect of isolating individuals receiving Medicaid home- and community-based services (HCBS) from the broader community of individuals not receiving Medicaid HCBS

**Setting Description**

The setting provides day services to individuals and is located in a small rural town. The site is surrounded by both small, independent businesses and private residences. Residential homes and apartments that are operated by the provider and located on the same block, providing supported living services.

**Summary of Initial Assessment Findings - 11/29/2018**

**1C)** The day program is located on the same property as three residential settings, all buildings are connected by a series of sidewalks.

**1F)** There is a full-time nurse located on site who oversees medication administration and other medical activities.

**1J)** People are required to have staff supervision outside the building.

**1K/6A)** There are not automatic door openers on the heavy front doors so a person using a wheelchair or walker would need staff assistance to open the double doors.

**1M/4C)** People were engaged in coloring activities and puzzles that were not age appropriate for adults.

**3G/7G)** People are not provided a secure space for their belongings, the provided stated that since most people live in one of the three residential settings also on the property, they can leave their things at home.

**7D/G)** Did not choose the setting but he likes it here very much.

**Compliance Validation Narrative with Provider Input**

**6/29/2020**

**1C)** This question was marked in error during the original assessment process as there are no ICF/IID settings located near the site.

**1F)** The provider stated that registered nurses do not perform medical tasks outside of medication administration as prescribed by individuals' physicians.

**1J)** Provider stated that the Executive Director has updated the Individual Rights Policy to include information on self-determination and the dignity of risk. They said people have been individually assessed to be supported to come and go as they please, provided they do not have any risk factors, which are documented in each person's support plan. This information was displayed during the validation process.

**1K/6A)** Provider stated that individuals are supported to move about the site including going outside as desired and noted that staff members are available to help if a person needs help with the door; however, they noted that all individuals can access the doors at this time.

**1M/4C)** Provider stated that the Day Services Supervisor provides monthly staff training on person-centered planning, thinking, and practice. They said the importance of age-appropriate activities and tasks have also been incorporated into these trainings.

**3G/7G)** Provider discussed and displayed new lockers that are available for individuals to use and securely store their personal belongings.

**7D/G)** Provider stated that the Executive Director has updated the Individual Rights Policy to include information on self-determination and the dignity of risk, noting that information regarding choice of setting and/or services are discussed and reviewed with individuals during their planning meetings.

Evidence Submitted to DMH for Review: example copy of plan of services and support, example copy of Activity Support Plan, picture of lockers, individual rights and person-centered policies and procedures and training records.

**Compliance Summary**

| <b>Compliant?</b>   | <b>Federal Requirement</b>  | <b>Summary of Evidence of Compliance</b>  |
|---|---|---|
| <p>42 CFR 441.304(c)(4)(i)</p> <p><input checked="" type="checkbox"/> Yes<br/><input type="checkbox"/> Partial<br/><input type="checkbox"/> No</p>  | <p>The setting is integrated in and supports full access of individuals receiving Medicaid HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS. 42 C.F.R. § 441.304(c)(4)(i).</p>           | <p>The setting completed a remediation plan and implemented staff training on person-centered planning and incorporated quarterly staff meeting to ensure community integration based on individual needs and choices. The setting also put documentation standards in place to ensure staff training, education and support provided to individuals are all maintained in staff files, as well as individual support plans. Individuals access the community daily and provide input about the things they would like to do in town. Information is documented in each person's support plan that outlines their likes, dislikes, interests, goals, and outcomes. Each person is individually assessed to determine their level of supports.</p> |
| <p>42 CFR § 441.301(c)(4)(ii)</p> <p><input checked="" type="checkbox"/> Yes<br/><input type="checkbox"/> Partial<br/><input type="checkbox"/> No<br/><input type="checkbox"/> Not Applicable</p> | <p>The setting is selected by the individual from among setting options including non-disability specific settings and an option for a private unit in a residential setting. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs, preferences, and for residential settings, resources available for room and board. <i>Id.</i> § 441.301(c)(4)(ii).</p> | <p>Each person has an individual schedule of daily activities that is based on their ASP. Schedules and goals are tailored to each person's individual needs and preferences and activities are chosen based on information contained in ASP, historical information, and requests made by individuals or their families/guardians. People are able to easily switch between activities as desired. Additionally, people are provided with flexibility when choosing when they wish to eat or take a break.</p>   |
| <p>42 CFR § 441.301(c)(4)(iii)</p> <p><input checked="" type="checkbox"/> Yes<br/><input type="checkbox"/> Partial<br/><input type="checkbox"/> No</p>  | <p>The setting ensures an individual's rights of privacy, dignity, respect, and freedom from coercion and restraint. <i>Id.</i> § 441.301(c)(4)(iii).</p>   | <p>The setting completed a remediation plan to update their individual right's policies to include information and support to individuals on dignity of risk / self-determination. A plan was also put in place to train staff on these person-centered practices upon hire, as well as to be covered during regular staff meetings.</p> <p>The setting maintains all confidential information and conducts health/ medical conversations in private. Staff were trained on the requirements to keep individual schedules and other personal information secure.</p>  |

**Mississippi Home and Community-Based Services  
Heightened Scrutiny Evaluation**  
*Setting Summary Sheet*

|  |  |  |
|--|--|--|
| <p>42 CFR § 441.301(c)(4)(iv)</p> <p><input checked="" type="checkbox"/> Yes<br/><input type="checkbox"/> Partial<br/><input type="checkbox"/> No</p>  | <p>The setting optimizes, but does not regiment, individual initiative, autonomy, and independence in making life choices, including but not limited to, daily activities, physical environment, and with whom to interact.</p>  | <p>The setting offers a variety of spaces for individual and group activities, including outdoor spaces to interact. The setting completed a remediation work plan to include staff training on the importance of age-appropriate tasks and activities. Trainings are designed to increase the knowledge of person-centered tools to determine the preferences, goals and risks specific to each individual.</p> |
| <p>42 CFR § 441.301(c)(4)(v)</p> <p><input checked="" type="checkbox"/> Yes<br/><input type="checkbox"/> Partial<br/><input type="checkbox"/> No</p>   | <p>The setting facilitates individual choice regarding services and supports, and who provides them.</p>   | <p>Individuals have the choice as to which setting staff provides his/her services and supports, including personal care.</p> <p>Individuals have the choice to regularly update their work or daily activities. Staff also share information and support individuals if they need to make a request for additional services or to make changes to their Activity Support plans.</p>                             |
| <p>42 CFR § 441.301(c)(4)(vi)(A)</p> <p><input checked="" type="checkbox"/> Yes<br/><input type="checkbox"/> Partial<br/><input type="checkbox"/> No<br/><input type="checkbox"/> Not Applicable</p> | <p>The unit or dwelling is a specific physical place that can be owned, rented, or occupied under a legally enforceable agreement by the individual receiving services, and the individual has, at minimum, the same responsibilities and protections from eviction that tenants have under the landlord-tenant law of the State, county, city or other designated entity. For settings where landlord-tenant laws do not apply, a lease, residency agreement, or other form of written agreement is in place for each HCBS participant providing protections that address eviction processes and appeals comparable to those provided under the jurisdiction's landlord-tenant law.</p> |  |

**Mississippi Home and Community-Based Services  
Heightened Scrutiny Evaluation**  
*Setting Summary Sheet*

|   |  |   |
|---|--|---|
| <p>42 CFR §<br/>441.301(c)(4)(vi)(B)</p> <p><input checked="" type="checkbox"/> Yes<br/> <input type="checkbox"/> Partial<br/> <input type="checkbox"/> No<br/> <input type="checkbox"/> Not Applicable</p> | <p>Each individual has privacy in their sleeping or living unit:<br/> (1) Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors.<br/> (2) Individuals sharing units have a choice of roommates in that setting.<br/> (3) Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.</p> |   |
| <p>42 CFR §<br/>441.301(c)(4)(vi)(C)</p> <p><input checked="" type="checkbox"/> Yes<br/> <input type="checkbox"/> Partial<br/> <input type="checkbox"/> No</p>  | <p>Individuals have the freedom and support to control their schedules and activities and have access to food any time.</p>  |   |
| <p>42 CFR §<br/>441.301(c)(4)(vi)(D)</p> <p><input checked="" type="checkbox"/> Yes<br/> <input type="checkbox"/> Partial<br/> <input type="checkbox"/> No</p>  | <p>Individuals are able to have visitors of their choosing at any time.</p>  |   |
| <p>42 CFR §<br/>441.301(c)(4)(vi)(E)</p> <p><input checked="" type="checkbox"/> Yes<br/> <input type="checkbox"/> Partial<br/> <input type="checkbox"/> No</p>  | <p>The setting is physically accessible to the individual.</p>   | <p>The setting is physically accessible for individuals with a physical disability and people have access to all common areas of the site. Staff provide assistive devices to individuals as needed according to their requests or what is documented in their support plans.</p> |