



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

Summary Sheet

Provider Name	Mississippi Christian Family Services
Setting Name	Handihaven Female Home
Setting Address	
	Rolling Fork, Mississippi, 39159
Original Site Assessment Date	November 29, 2018
Validation Date	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 is located in a small rural town and supports only female individuals. The setting is surrounded by both small, independent businesses and private residences. The setting consists of a day program site with administrative offices, three residential homes (supervised supported living) and a fourth home under construction that will be for supported living. All settings in this area are owned and operated by MCFS.

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There is a privacy fence that surrounds this home and the adjacent home, which is also owned and operated by MCFS and supports only female individuals. There is a sidewalk connecting the two homes.

Summary of Initial Assessment Findings - 11/29/2018

- 1B) Site is surrounded by a privacy fence
- 1D) The home is adjacent to and also across the street from other homes operated by the provider on the same parcel of land
- 1E) The site consists of a day program site with administrative offices, three residential homes (supervised supported living) and a fourth home under construction that will be for supported living
- 1F) The site consists of a day program site with administrative offices, three residential homes (supervised supported living) and a fourth home under construction that will be for supported living
- 1N) The setting does not allow people the freedom to move about the setting, including the freedom to go outside as they choose
- 1P) Assessor could not confirm that tasks and activities, both inside and outside the setting, are comparable to tasks and activities for people of similar ages
- 2C) People are not provided options when choosing the setting
- 2G) Unclear to the assessor as to whether people have a choice in housemates.
- 3F) Individual schedules are not kept private
- 3H) The setting/service does not provide the opportunity for all people to have the space in order to speak on the telephone, open and read mail, and visit with others in private
- 3K) The setting does not offer a secure place for each person to store their belongings
- 3O) The site is not free from postings of employee information
- 4A) There is a fence around the property
- 4C) The site assessor could not confirm that the setting affords the opportunity for tasks and activities that match to individual needs/goals
- 4E) People are not allowed to eat in their rooms
- 4I) People do not have the choice to remain at home during the day rather than be required to participate in onsite day programs
- 4J) People do not have the choice to stay home when housemates want to go out
- 7A) People do not have keys to their rooms
- 7B) People do not have keys to their home
- 8C) People are not allowed to eat in their rooms
- 9C) People cannot meet visitors of the opposite sex in private. Individuals have a curfew and are required to be in "before dark"
- 11L) People cannot keep valuables locked up/secured
- 11P) People cannot eat in their rooms
- 12D) People cannot remain at home while others go out

Compliance Validation Narrative with Provider Input

6/29/2020

- 1B) Setting removed privacy fence around yard.
- 1D/E/F) This setting operates independently from other homes/day program owned by provider in the immediate area. It should also be noted that 1D was marked in error during the original assessment, as there are no IID/ICF settings near this property.
- 1N) Setting individually assesses people to determine if they need staff supervision to access the yard. Staff members trained on person-centered policies and individual rights.
- 1P) Staff members work with individuals to determine activities and activities are chosen based off of individuals interests, abilities, and goals.
- 2C) Setting completed remediation plan to educate and train staff members to work with individuals and their families to review non-disability specific setting options before deciding to live on location.

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2G) Staff members completed training with provider to ensure that individuals are supported to tour the setting and meet with potential housemates before deciding to live on site.

3F) 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.

3H) 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. Individuals are supported to seek out privacy as desired to complete personal activities.

3K/11L) Provider stated that each person was individually approached and assessed to determine if they would prefer to have a key to the home and to their bedrooms. Each individual decided they would like a key to the home and bedroom. Individual files were updated to include this information. Provider displayed new keyed locks for each bedroom.

3O) Staff displayed that all employee postings had been removed from the common areas of the home;

4A) Setting removed privacy fence around yard.

4C) Staff members work with individuals to determine interests and activities are chosen based off of individuals interests, abilities, and goals.

4E/8C/11P) Staff members were trained on person-centered policies and allowing individuals to eat in the location of their choosing.

4I/J/12D) Staff members were trained to focus on individuals' rights and preferences. Individuals are supported to remain in the setting with an additional staff member if they do not want to participate in group activities or leave the setting.

7A/B) Provider stated that each person was individually approached and assessed to determine if they would prefer to have a key to the home and to their bedrooms. Each individual decided they would like a key to the home and bedroom. Individual files were updated to include this information. Provider displayed new keyed locks for each bedroom.

9C) The setting completed a remediation plan to update the individual rights policy to include dignity of risk and self-determination when it comes to making choices about their relationships with others. Individuals were educated and informed on their rights to meet with visitors privately as they choose. The setting also trained staff on these practices and removed other blanket restrictions such as no visitors of the opposite sex in the individual's room. Staff were educated on these procedures.

Evidence Submitted to DMH for Review: individual rights and person-centered policies and procedures, training records, picture of yard without a privacy fence, picture of walls without postings in common areas, and pictures of bedroom doors that lock.

Compliance Summary

Compliant?	Federal Requirement	Summary of Evidence of Compliance
<p>42 CFR 441.304(c)(4)(i)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <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 received permission from HUD to remove the fence surrounding the two homes to remove the appearance of isolation. Further, the setting 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. The setting also updated policies to no longer require individuals to go on the same outings as other individuals living in their home, as well as the adjacent homes</p>
<p>42 CFR § 441.301(c)(4)(ii)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <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>At the time of the original onsite assessment, staff were unclear if individuals had choices in non-disability options when choosing this setting. The provider did allow tours of the home before selection, and people would tour the home with their family members and/or support coordinators. The setting completed a remediation plan to educate individuals, family members, etc. on the rights of individuals to choose housemates at the time of admission and before new people move into the home. Documentation on these choices will also be included in the individual's plan.</p>
<p>42 CFR § 441.301(c)(4)(iii)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <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. Additional policies were updated to remove any blanket restrictions, such as the policy that individuals must be supervised by staff at all times. Staff were also trained on these changes.</p> <p>The setting maintains all confidential information and conducts health/ medical conversations in private. Staff were trained on the</p>

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		requirements to keep individual schedules and other personal information secure.
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<p>42 CFR § 441.301(c)(4)(iv)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <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 completed a remediation plan to update furnishings and complete repairs needed to the home. The setting further trained staff on the importance of keeping homes/ rooms clean. In removing the fence, the staff have also worked to better integrate the homes into the community and remove the appearance of isolation and increase autonomy.</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. Training are designed to increase the knowledge of person-centered tools to determine the preferences, goals and risks specific to each individual.</p> <p>The setting also completed a remediation plan to implement monthly meetings with staff and individuals to discuss meal preferences and menu planning. The setting also removed policies where individuals were not supported to eat in their rooms or other areas of the home.</p> <p>The setting completed a remediation plan to update staffing patterns to ensure individuals have the choice to remain in their home if they do not want to attend a day program, work or engage in group activities outside of the home. Documentation will be maintained in the provider training files, and individual education will be documented in their plan.</p>
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<p>42 CFR § 441.301(c)(4)(v)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <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 <input type="checkbox"/> Partial <input type="checkbox"/> No <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>	<p>Each person in the setting has a rental agreement that is signed by the individual. Most of the individuals' rent is HUD or Section 8 subsidized.</p>
<p>42 CFR § 441.301(c)(4)(vi)(B)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p>	<p>Each individual has privacy in their sleeping or living unit:</p> <p>(1) Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors.</p> <p>(2) Individuals sharing units have a choice of roommates in that setting.</p> <p>(3) Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.</p>	<p>Provider completed a remediation plan. Provider stated that each person was individually approached and assessed to determine if they would prefer to have a key to the home and to their bedrooms. Each individual decided they would like a key to the home and bedroom. Individual files were updated to include this information. Provider displayed new keyed locks for each bedroom.</p>

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<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(C)</i></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <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>Individuals in the setting have access to the kitchen and food at all times. Individuals also have the option to eat at restaurants within the community. The setting completed a remediation plan to ensure individuals do not have to eat at the dining room table. The setting removed any assumed policies prohibiting individuals from eating in their rooms or other areas of the home and completed staff training. Individuals were also educated on this change.</p>
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(D)</i></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	<p>Individuals are able to have visitors of their choosing at any time.</p>	<p>Individuals can have visitors at the home any time of their choosing. The setting completed a remediation plan to update the individual right's policy to include dignity of risk and self-determination when it comes to making choices about their relationships with others. Individuals were educated and informed on their rights to meet with visitors privately as they choose. The setting also trained staff on these practices and removed other blanket restrictions such as no visitors of the opposite sex in the individual's room. Staff were educated on these procedures. All staff will be trained upon hire, and these practices will continue to be discussed at regular staff meetings throughout the year. Documentation of these trainings is included in staff education binders.</p>
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(E)</i></p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	<p>The setting is physically accessible to the individual.</p>	<p>The home was observed to be physically accessible to all individuals living in the home. The home included handheld showers and grab bars in the bathroom. Should an individual need any assistive devices, the setting would support the individual in providing what was needed.</p>