



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

Summary Sheet

Provider Name	Mississippi Christian Family Services
Setting Name	Supported Living
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. These sites are comprised of 3 separate individual apartments that house one person a piece.

Summary of Initial Assessment Findings - 11/29/2018

1E/F) The supported living apartment complex is located next to the day program and behind other supervised living homes. All services are congregated on one block.

1G) Staff said registered nurses provide wellness checks and medication administration on site, adding that “nursing” is part of the services provided.

1Q/12I/K) People do not have access to their money at any time.

4F/K) Individual has access to food but is unable to utilize kitchen appliances, such as the stove.

7A/C) Individuals do not have locks on bedroom or bathroom doors.

9A) New or first-time guests are required to sign in and out when visiting the site.

10A) Setting not accessible for individuals with physical disability.

11D) Person did not choose this home.

11E) Person wishes to live elsewhere.

11K) People do not have access to their own mail.

12I/K) Has limited access to money.

Compliance Validation Narrative with Provider Input 6/29/20

1E/F) This setting operates independently from other homes/day program owned by provider in the immediate area.

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

1Q/12I/K) People are individually assessed to determine who needs assistance and supervision when accessing their money. This information is documented in each person’s IPP.

4F/K) Some individuals have limited access to kitchen appliances due to documented risk in their individual plans. This information is reviewed by staff members regularly and documentation was observed during validation process.

7A/C) Individuals do not have locks on their bedroom and bathroom doors; however, they have locks for their apartment doors. They are the sole occupants of their home.

9A) The provider revised their visitor policy and displayed this during the validation process. Visitors are no longer required to sign in and out when accessing the setting.

10A) Setting is physically accessible for individuals living on site.

11D/E) Staff members were trained on person-centered policies as well as to focus on individuals’ rights and preferences. Setting options and preferences are reviewed with individuals annually or as needed.

11K) Staff members were trained on person-centered policies as well as to focus on individuals’ rights and preferences, including checking and opening their own mail.

Evidence Submitted to DMH for Review: P&P, staff training records and pictures.

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>Provider completed a remediation plan. Provider stated that MCFS does operate a day program and other group homes in the immediate area. They said to ensure each home is viewed as a separate entity with its own identity, the homes will not require individuals to go on the same outings as the other residents or homes. They noted that each person has their own voice when making choices (i.e. go to events of their choosing, not just because the other homes or people are going). They said documentation of choices will be in the daily service notes, while documentation of education to do whatever they want, whenever they want will be recorded in the person's education binder kept in the Supervisor's office. Provider stated that people in the homes are given a list of all available programs in the area to choose from, noting that other programs beyond MCFS were available nearby. They said documentation is in a person's Plan of Services and Supports (PSS) and if a person in the group home does not desire to go to a day program, staff members support them to stay home during the day. They said Supervised Living Staff and Supervisor will provide training to individuals on their rights to voice their opinions and state their choices. They explained that documentation of training and choice offerings will be included in individuals daily service notes and education binder. They said the Director and Supervisor will revise any/all policies and procedures in the group home to remove blanket restrictions that apply to all individuals; instead, individualized plans will be implemented to better integrate into the community and avoid segregating and clumping individuals with disabilities into one cluster. Staff will be educated by the Supervisor on the person(s) rights to make their own choices and documented in the staff's education binder. They noted training and documentation began in January of 2020. Additionally, individuals are individually assessed to determine if they need assistance or monitoring when accessing their personal funds. This information is reviewed during planning meetings and updated as needed. All information regarding access to money is documented in individual's plan.</p>

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<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>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>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 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>

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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 rents are 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: (1) Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors. (2) Individuals sharing units have a choice of roommates in that setting.</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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	(3) Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.	
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(C)</i></p> <p style="text-align: center;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	Individuals have the freedom and support to control their schedules and activities and have access to food any time.	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.
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(D)</i></p> <p style="text-align: center;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	Individuals are able to have visitors of their choosing at any time.	Individuals can have visitors at the home any time of their choosing. 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. 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 style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(E)</i></p> <p style="text-align: center;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	The setting is physically accessible to the individual.	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.