



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

Summary Sheet

Provider Name	Region 14 – Singing River Services
Setting Name	Eddie DiSanti Group Home
Setting Address	
	Gautier, MS, 39553
Original Site Assessment Date	10/08/2018
Validation Date	06/29/2020

Setting Type

- Supervised Living
- Shared Supported Living
- Supported Living
- Day Services – Adult
- Day Habilitation
- Prevocational Services
- Community Services

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 between residential and commercial neighborhoods. Single-family homes are located nearby in addition to small businesses. A small privacy fence surrounds the backyard of the property; however, this fence is accompanied by an unlocked gate that generally remains open. A Day Program is located near the setting that is owned and operated by the same provider.

Summary of Assessment Findings	10-08-2018
<p>1C) Front door is locked and no one can enter the home without a key.</p> <p>1E) Site is located next to Day Program run by same provider, Region 14 Singing River Services.</p> <p>1I) People can only run errands independent of the group when there is more than one staff person working.</p> <p>1K) Activities are chosen by staff and submitted to the “Board” for approval. Individuals choose from the activities identified by staff.</p> <p>1N) Individuals have to be monitored when they go outside.</p> <p>2C) Staff unsure if people were provided with different setting options.</p> <p>2G) Staff unsure of process for changing housemates, thinks there is no choice.</p> <p>2H) Staff thinks bedrooms were decorated by people’s families.</p> <p>3A) Staff didn’t know if people could decorate the common areas.</p> <p>3L) Staff are unsure if people are informed of their rights at admittance and annually thereafter.</p> <p>3M) It isn’t clear whether people are informed of the grievance/complaint policy (for example, for those who cannot read), although it is posted in the home.</p> <p>3O) Site has employee postings.</p> <p>4G) There are restrictions on where men and women may go in the home.</p> <p>4H) There are some limitations on site supporting people to practice religion, access money and vote.</p> <p>4I, 4J) People can only stay home from the Day Program or refrain from going out with housemates if a staff person is available.</p> <p>5D) Not clear if site has person-centered policies.</p> <p>6A) Staff unsure if people have leases.</p> <p>9B) People can only have visitors at “reasonable hours.” Visitors’ unknown to staff must show ID.</p> <p>9D) People only let in visitors if they know the person.</p> <p>11C) Not clear if people must do errands with everyone when they don’t want to.</p> <p>11I) Neither person has a phone number to call if they have a problem.</p> <p>11P) Neither person can eat where they want.</p> <p>11R) Both people have to be in bed by 9 pm on weekdays.</p> <p>12D) Individuals can only stay home if staff are present. One thing to note is the way individuals report getting money. One reported getting her “allowance” from family, and the other reported getting it from staff only on the weekend.</p>	

Heightened Scrutiny Compliance Narrative with Provider Input	6-29-2020
<p>1C) The provider stated individuals have been provided a key to the front door as well as a key to their bedroom. The provider stated individuals are informed of this right upon admission and annually thereafter. The provider stated if an individual waives their right to a key upon admission or at any point after it will be documented in their admission package. The provider said individuals are informed they have the right to the keys and the right to request a key to the home and/or bedroom at any time even if previously waived. The provider stated staff has been trained on this right.</p> <p>1E) The provider stated the setting is located between residential and commercial areas in town. The provider explained they operate a Day Program that is located within walking distance from the site; however, schedules and activities are separate for each location and individuals have the choice of where they would like to attend activities in the community as well as which day program they attend.</p> <p>1I, 4I, 4J, 11C, & 12D) The provider stated that additional staff members are available to remain with individuals on site or assist them into the community if they wish to run errands independent of their housemates/roommates. They stated that individuals are able to go to the church services, day program services of their choice, or remain at home in the setting with additional staff members as preferred. The provider stated individuals have been informed of their right to request, manage, and hold their money as they choose. The provider stated they have updated their policies to reflect these rights and have changed their staffing models to accommodate person-centered planning.</p>	

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1K, 5D) The provider stated individuals participate in creating the monthly calendar in the setting. The provider stated they plan a variety of activities including going to the movies, eating out, and bowling. The provider stated individuals are free to participate or opt out of any activity or outing. The provider stated staff has been trained on the final rule and person-centered thinking. The provider stated their policies have been updated to incorporate person-centered thinking and planning. The provider stated ongoing training for staff and education for individuals will continue.

1N) The provider stated training videos, written curriculum and verbal instructions are provided to employees quarterly. The provider explained topics include final rule policy and procedures, various ARC curriculum, rights of persons and freedom of choice to go in/out when they would like. The provider said sign-in sheets are completed at each training with the topics listed, person completing training, signatures of employees completing the training and length of training.

2C, 2G) The provider stated individuals work with their service coordinators and have the opportunity to tour the home prior to selecting the setting. Additionally, the provider said individuals are provided with multiple settings to choose from before deciding to live in this site. The provider said individuals make the final choice on where to live. The provider said individual are provided non-disability specific options. The provider stated they have a created a policy which contains the process to request a change in settings, housemates, and/or roommates. The provider said individuals and staff have been educated on this policy and procedure.

2H, 3A) The provider stated bedrooms are furnished; however, individuals are encouraged to decorate their room with their personal furniture, accessories, and personal items. The provider stated individuals are free to bring their own linens, curtains, and items to make their bedroom feel like home. The provider also explained individuals have input on how common areas are decorated year-round as well as how they are decorated for holidays, seasons, and special occasions.

3L, 3M, 4H, 11I, & 12D) The provider stated individuals are informed of their rights upon admission and annually thereafter in a format they are able to understand. The provider said a review of their grievance policy as well as how to submit a grievance is included in the admission discussion and annually thereafter. The provider explained individuals are informed of their right to practice the religion of their choice as well as their right to vote. The provider said staff have been trained upon hire, quarterly, and annually on individual rights. The provider stated individuals have been given a phone number to call to report a complaint or file a grievance. The provider stated the grievance policy which is reviewed annually includes the phone number to call.

3O) The provider stated all employee information previously posted in the setting have been removed.

4G) The provider stated individuals are supported to choose with whom they spend their time. The provider noted individuals are able to spend time with their guests or housemates in the location of their choosing inside the home, including bedrooms and other private areas. The provider met with staff members to ensure these policies are being practiced within the home.

6A) The provider stated individuals have a lease to live in the setting which includes terms for termination including eviction processes and appeals.

9B, 9D) The provider stated staff members have been trained on individual rights regarding visitors. The provider stated individuals are supported to see their visitors at the time of their choosing. They stated that the setting does not have set visiting hours. Additionally, the provider stated the visitor's policy has been updated to remove the requirement of visitor's providing identification upon admission. The provider said employees are trained on this policy during orientation and annually thereafter.

11P) The provider stated they have updated their policies to include individuals' right to choose, when, what, and where they eat their meals. The provider stated individuals are informed of their right to eat privately upon request.

11R) The provider stated policies regarding person-centered thinking have been updated to reflect individuals' rights to set their own schedules and participate in activities and outings of their choice. The provider stated individuals are informed of starting times for day programs, activities, and outings but are given the opportunity to set their own schedule including opting out of any program, activity, or outing.

Evidence Submitted to DMH for Review:

BIDD received and reviewed a copy of the Rights form used by Region 14, section of the Policy & Procedures manual for Region 14 relating Grievance policy, the Organization & Policy manual describing Supervised Living (in accordance with DMH policy standards), a copy of the Release of Information form,

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a map of the home with safety equipment locations, and a copy of the 10 page "Resident Handbook" for the home (addressing matters of choice of activity, control of money, community involvement, and personal rights)

Compliance Summary

Compliant?	Federal Requirement	Summary of Evidence of Compliance
<p><i>42 CFR 441.304(c)(4)(i)</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. <i>42 C.F.R. § 441.304(c)(4)(i).</i></p>	<p>Individuals are supported to participate in opportunities and activities, including employment, in the community. Individuals are supported to manage their personal resources. Individuals are offered learning opportunities on topics including budgeting and money management.</p>
<p><i>42 CFR § 441.301(c)(4)(ii)</i></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. § 441.301(c)(4)(ii).</i></p>	<p>Individuals have opportunities to choose from non-disability specific settings. Documentation of these choices and the discussions are included in the individual's person-centered service plan.</p>
<p><i>42 CFR § 441.301(c)(4)(iii)</i></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. § 441.301(c)(4)(iii).</i></p>	<p>Individuals are given a copy of their rights upon admission and information is posted in the setting. Rights are reviewed with individuals on an annual basis. Staff are required to complete ongoing training on individuals' rights.</p>
<p><i>42 CFR § 441.301(c)(4)(iv)</i></p> <p><input checked="" type="checkbox"/> Yes</p>	<p>The setting optimizes, but does not regiment, individual initiative, autonomy, and independence in</p>	<p>Individuals are supported to spend their time with whomever they choose and participating in whichever activities they enjoy. Staff have access to individuals' person-centered plans.</p>

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<input type="checkbox"/> Partial <input type="checkbox"/> No	making life choices, including but not limited to, daily activities, physical environment, and with whom to interact.	
42 CFR § 441.301(c)(4)(v) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No	The setting facilitates individual choice regarding services and supports, and who provides them.	Individuals have the choice of staff who provide his/her services, supports, and personal care. Individuals have the opportunity to adjust their work or daily activities. Staff support individuals to make a request for additional services or to make changes to their Activity Support plans.
42 CFR § 441.301(c)(4)(vi)(A) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	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.	Each person in the setting has a rental agreement that is signed by the individual. Most rents are HUD or Section 8 subsidized.
42 CFR § 441.301(c)(4)(vi)(B) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	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. (3) Individuals have the freedom to furnish and decorate their sleeping	Individuals in the setting have keys to their bedroom and the setting. Individuals are supported to decorate their bedroom as they choose and to their taste.

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	or living units within the lease or other agreement.	
<p>42 CFR § 441.301(c)(4)(vi)(C)</p> <p><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 food at all times. Individuals have full access to the kitchen including the stove/oven. Individuals also have the option to eat at restaurants within the community. Individuals are not required 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>42 CFR § 441.301(c)(4)(vi)(D)</p> <p><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 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 are 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>42 CFR § 441.301(c)(4)(vi)(E)</p> <p><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.