



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

Summary Sheet

Provider Name	Region 6 – Life Help
Setting Name	Life Help Industries - Greenville
Setting Address	
	Greenville, Mississippi, 38703
Original Site Assessment Date	November 28, 2018
Validation Date	June 25, 2020

Setting Type

- Supervised Living
- Supported Living
- Shared 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
Setting is found in a large building in the center of town. It is surrounded by both residential and commercial areas.

Summary of Initial Assessment Findings	11/28/2018
<p>1B) Site does not support recreational activities in the community.</p> <p>1C) Site is co-located; next to a hospital.</p> <p>1E) Site not specifically designed to service people with disabilities.</p> <p>1F) Nursing, case management and behavioral services all provided onsite.</p> <p>1G) Non-work activities are not supported on site.</p> <p>1H) People do not regularly interact with members of the community, unless it is onsite.</p> <p>1J/1K) People cannot move about the setting as they wish.</p> <p>1M) Activities limited to inside the setting and people are divided into groups based on “function.”</p> <p>3G/7G) No secure location for belongings.</p> <p>4A/4D/6B) Site contains multiple locked doors that prevent people from moving about the setting, including going to the bathroom.</p> <p>4B2) People cannot access outside without staff.</p> <p>4H2/7A/7B) People are not supported to move about the community.</p> <p>7K) People cannot eat outside.</p>	
Compliance Validation Narrative with Provider Input	6/25/2020
<p>1B) Provider said during the annual Plan of Service and Supports meeting, strengths and weaknesses, as well as likes and hobbies, are identified. They said activities are identified in the Activity Support Plan that individualizes the activities people participate in whether center or community-based. They said staff discusses with individuals activities that they want to participate in that may not be on the Activity Support Plan. They said every effort is made to accommodate the wants and needs of people in the program involving leisure and recreational activities, communication activities, spiritual, cultural, vocational, volunteerism, educational, development of living skills, health and wellness, and other interests identified by individuals.</p> <p>1C) Provider stated that the site is not located next to a hospital. They said it is located on the same street but separated by the Alliance Cancer Center. They said their building and program are not a part of the hospital and have nothing to do with the finances or business of the hospital. Provider reiterated that the site is completely separate from the hospital and nearby facilities.</p> <p>1E) Provider said the setting was not specifically designed for individuals with disabilities; however, they noted that the current primary purpose of this space is to provide services for individuals with disabilities. They noted that setting provides space for other community events as needed but is primarily utilized by the provider for individuals.</p> <p>1F) Individuals are given a choice of providers and services. They said it is at that point the person chooses their IDD service and provider. They said Region 6 will refer the person back to the Support Coordinator or Targeted Case Manager if they want to change or add another service. They noted that they only offer IDD programs through the IDD service. Provider stated that in Greenville, they only offer Prevocational services. They said the Support Coordinator or TCM lets people know of all other services and programs available to them and has the person sign off on their choice of IDD services. They said people decide where they want to go for any other service such as health, dental, or health related services.</p> <p>1G) Provider states that activities people choose to participate in include meaningful non-work activities by going in the community to gain knowledge about work positions and job duties. They said people have opportunities to visit different places in the community, make purchases, visit friends, and interact with other members of the community. They said goals/outcomes are developed during the PSS process and supervisors develop an ASP specific to a person's wants, needs, strengths, and interests.</p> <p>1H) Provider said trainings on increased community integration will be conducted by the IDD Coordinator with IDD Supervisors, adding that they train their assistants. They said the desired</p>	

**Mississippi Home and Community-Based Services
Heightened Scrutiny Evaluation**

Setting Summary Sheet

outcome will be strategies to facilitate community activities in the same manner as people not receiving HCBS. They said the success of the training will be an increase in opportunities for people to participate in community activities. Provider said during the site assessment, staff did not understand what the assessor was asking due to confusion on terminology used. They said increased meetings and discussions of the subject of community integration with staff and individuals has led to more opportunities in the community.

1J/1K) Provider explained that each person is individually assessed on their required supports and potential risks when going outside. They said any identified risk is addressed individually according to people's abilities and skills. They said this is implemented and addressed in each individual's PSS and ASP. They said people that are more at risk are identified by staff and documented by the Supervisor.

1M) Provider said training is done by the IDD Coordinator on age-appropriate activities with the IDD Supervisors to include community access/interaction. They said these activities are identified in the ASP according to the outcomes on the PSS. Provider said Supervisors train assistants on increased activities that are chosen by the people through weekly discussions, feedback from individuals, and focus on age-appropriate activities. They said people's preferences and interest will be addressed in Person-Centered Planning and readdressed throughout the year as needed.

3G/7G) Provider explained and displayed that new lockers were ordered and installed from Global Industries. They said people have the option of bringing their own lock, using a lock onsite, or leaving their locker unlocked if they so choose; however, they said everyone has the option of having their own space to store their belongings if desired.

4A/4D/6B) Provider stated that all individuals can come and go as they please, noting that keypads are used throughout the site for safety and security purposes. They conveyed that in recent years multiple disruptions and disturbances have taken place onsite because strangers or unauthorized individuals have entered the premises without permission. They said keypads were reconfigured so that individuals are able to use as needed to enter the building. They said individuals who do not wish to utilize the keypad are able to request staff assistance to enter the building. They said this information is discussed and documented during the PSS meeting. They noted that individuals are informed of this process before choosing to attend the program.

4B2/7K) Provider said individuals have the freedom to move about the space according to the risks identified during PSS process and implemented in the ASP. They said any identified risk is addressed individually according to a person's abilities and skills. They said people that are at risk have been identified by supervisors and are monitored as needed by staff members. This includes choosing where they wish to eat on site.

4H2/7A/7B) Provider said training is conducted by the IDD Coordinator with IDD Supervisors on community integration activities including moving about the community. They said Supervisors then training their assistants on moving about the community through activities identified from the PSS. They said staff and individuals are educated on individual rights to ensure choices and promote independence and opportunities in all life activities. Provider said activities people choose to participate in include going to the community to gain knowledge about work positions, job opportunities, activities, and other areas of interest to an individual. They said people have opportunities to visit different places in the community, make purchases, and interact with different people in the community. They said outcomes are measured by an increase in opportunities for community integration/interaction.

Evidence submitted for DMH review: P&P, staff training, locker policy, Choice of Service and Provider forms, service notes

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 supervisors/staff members have completed training on HCBS standards and regulations. This information is documented for each staff member. Site intends to implement more community integration activities for individuals in the program. Staff members increase individual input on activities by engaging people in weekly discussions and asking for their feedback and ideas. Activities are identified in ASPs and staff discusses additional activities with individuals during regular discussions. The setting offers a variety of spaces for individual and group activities. 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>Each person in the setting is individually assessed on their required supports and potential risks when going outside. Setting will lift blanket restrictions on how individuals access the site. Each person's required supports are documented in their PSS and ASP.</p> <p>Provider states that activities people choose to participate in include meaningful non-work activities by going in the community to gain knowledge about work positions and job duties. They said people have opportunities to visit different places in the community, make purchases, visit friends, and interact with other members of the community. They said goals/outcomes are developed during the PSS process and supervisors develop an ASP specific to a person's wants, needs, strengths, and interests.</p> <p>The setting completed a remediation plan to install electronic keypads throughout the site. Individuals are individually assessed to utilize these security devices and are able to come and go from the site as they please. Each person's required supports or levels of assistance are documented in the ASP during the PSS process.</p>

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

<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>Activities are chosen based off of each person's individual preferences and goals as determined in their PSS or ASP. People have flexibility in their scheduled activities and are able to modify their activities as desired. Individuals also share activity preferences during regular conversations with staff members.</p> <p>Meal and break times are flexible and people are able to stop their activities at any time to eat or take care of personal matters. Food is always available.</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>All personal information is stored electronically. Discussions of health and personal care activities are conducted in private. People have the opportunity to meet with visitors or speak on the phone in private.</p> <p>The setting completed a remediation plan and each person has their own locker and have the option of bringing their own lock, using a lock onsite, or leaving their locker unlocked if they so choose.</p> <p>Restraints are prohibited on site and staff members treat individuals with respect by referring to them by their first names and speaking in a regular tone of voice.</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 offers a variety of spaces for individual and group activities. 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 completed a remediation plan to install electronic keypads throughout the site. Individuals are individually assessed to</p>

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

		<p>utilize these security devices and are able to come and go from the site as they please. Each person's required supports or levels of assistance are documented in the ASP during the PSS process.</p> <p>Staff members are trained on individual rights during weekly meetings and discussions. Additional training on the importance of community integration and the introduction of more community-based activities are also discussed during these trainings and meetings.</p>
<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>The grievance procedure is explained to each individual upon admission and annually thereafter. Staff members inform individuals of their rights to ensure freedom of choice and to promote independence.</p> <p>Activities are chosen based off of each person's individual preferences and goals as determined in their PSS or ASP. People have flexibility in their scheduled activities and are able to modify their activities as desired. Individuals also share activity preferences during regular conversations with staff members.</p>
<p>42 CFR § 441.301(c)(4)(vi)(A)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input checked="" 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</p>	<p>This is a day program setting.</p>

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

	eviction processes and appeals comparable to those provided under the jurisdiction's landlord-tenant law.	
<p>42 CFR § 441.301(c)(4)(vi)(B)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input checked="" 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>	This is a Day Program setting.
<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.	
<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.	
<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 setting completed a remediation plan to install electronic keypads throughout the site. Individuals are individually assessed to utilize these security devices and are able to come and go from the site as they please. Each person's required supports or levels of assistance are documented in the ASP during the PSS process.