



**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 - Cleveland
Setting Address	
	Cleveland, Mississippi, 38732
Original Site Assessment Date	November 28, 2018
Validation Date	June 25, 2020

Setting Type

- Supervised Living
- Supported Living
- Shared Supported Living
- Day Services Adult
- 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 site is located on the second story of a multi-use building. This building houses the pre-vocational program in addition to a Region 6 Elderly Program the PSR Day Program. It is an older building located in the downtown area surrounding by private residences.

Summary of Initial Assessment Findings	11/28/2018
<p>1B/4H2/7A) Site does not support community recreational activities.</p> <p>1E) Site not specifically designed for people with disabilities.</p> <p>1G) Non-work activities are not supported on site.</p> <p>1H/7B) People do not regularly interact with members of the community.</p> <p>1J/4D/4A/6A/6B) People cannot move about the setting as they wish; setting not accessible.</p> <p>1L) Site does not offer transportation.</p> <p>1M/4C) Observed activities were not age appropriate.</p> <p>3G/7G) No dedicate space to secure belongings.</p> <p>4B2) No dedicated outdoor space.</p> <p>5A) Site cannot accommodate requests for male staff assistance.</p> <p>7C) People cannot run errands independently.</p> <p>7E) People cannot use the phone when they desire.</p> <p>7F) People said they cannot make calls in private.</p> <p>7H) People said they do not make their own decisions.</p> <p>7K) People cannot eat where they prefer.</p>	
Compliance Validation Narrative with Provider Input	6/25/2020
<p>1B/4H2/7A) Supervisors increase activities that are chosen by people through implementing weekly discussions and feedback from individuals. 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>1E) Provider explained that the building has always been handicapped accessible and follows the standards of DMH. They said the IDD Coordinator will conduct the training with Supervisors to be sure they understand all sites are specifically designed for people with disabilities. They said the training is conducted upon hire and annually thereafter. They said the desired outcome is for everyone to understand program specific terminology such as community integration and handicapped accessibility.</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/7B) 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 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.</p> <p>1J/4D/4A/6A/6B) 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.</p>	

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1L/7C) All transportation is provided by Region 6 to individuals in the program. Provider noted that when transportation is subcontracted out Life Help pays all fees to transport the people to and from the program. They said the program has a van available at all times for community outings and integration activities of individuals' choosing. They said transportation needs and preferences are addressed during person centered planning and readdressed throughout the year as needed. They stated that once a year Life Help drivers are trained by their Supervisor's on transportation standards and the Transportation Manager trains them on safety and defensive driving. They said Life Help vans are used for training.

1M/4C/7E/F/H/K) 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. This includes talking on the phone or meeting with visitors as desired. Individuals are supported to conduct activities, eat, and take breaks in the location of their choosing.

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.

4B) 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.

5A) All settings and staff options are discussed during the development of the PSS and readdressed as needed throughout the year. They said they work to meet the personal needs of all individuals onsite.

Evidence submitted to DMH for review: Staff training, service notes, locker policy, P&P, conversation with Kimberlee Miller in regard to 7c – running errands independently. “Recent re-training on this to ensure if a person wants to go out alone, they can. Copy of training was submitted to BIDD

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. Additional training has been done with staff to ensure employees understand specific terminology such as community integration and handicapped accessibility.</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 said the IDD Coordinator conducts training on transportation standards with IDD Supervisors annually. They said the Supervisors train the assistants upon hire and annually thereafter. They said the desired outcome is for all IDD staff to be informed how Region 6 provides transportation in each county served. They said all transportation is provided by Region 6 to individuals in the program. Provider noted that when transportation is subcontracted out Life Help pays all fees to transport the people to and from the program. They said the program has a van available at all times for community outings and integration activities of individuals' choosing.</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-</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>

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	<p>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>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 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>

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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>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 eviction processes and appeals comparable to those provided under the jurisdiction's landlord-tenant law.</p>	<p>This is a Day Program setting.</p>
<p>42 CFR § 441.301(c)(4)(vi)(B)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> Partial</p>	<p>Each individual has privacy in their sleeping or living unit: (1) Units have entrance doors lockable by the individual, with only</p>	<p>This is a Day Program setting.</p>

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<input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable	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 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> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No	Individuals have the freedom and support to control their schedules and activities and have access to food any time.	
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(D)</i></p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No	Individuals are able to have visitors of their choosing at any time.	
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(E)</i></p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No	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.