



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

*Summary Sheet*

<b>Provider Name</b>	Region 4 – Timber Hills
<b>Setting Name</b>	Proper Street I
<b>Setting Address</b>	
	Corinth, Mississippi, 38834
<b>Original Site Assessment Date</b>	November 05, 2018
<b>Validation Date</b>	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**

Staff noted that the administrative office for Region IV Timber Hills is approximately one mile away. The site is located in a neighborhood consisting of single-family homes. Next door to the supervised living home is a privately owned nursing facility for the elderly. The nursing home is located in a residential neighborhood and Region IV has no connection to the nursing facility.

The history behind Whitfield Nursing Home located next door to Proper Street Supervised Living is as follows: The location started out in the early 1900's as the residence of Benjamin Whitfield and his wife

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Sarah Loper-Whitfield. In the late 1920's local doctors in Corinth area asked Mr. and Mrs. Whitfield to open a hospital. The original Corinth Hospital started out as a 10 bed/10 bassinet hospital located in the residential community. When Mr. Benjamin Whitfield died in the early 1960's, his wife Sarah continued to operate the community hospital. In 1966 Ms. Whitfield and her sons Maury and Winston Whitfield opened up the nursing home. Ms. Sarah Whitfield died in the early 1970's, both Winston and Maury Whitfield inherited the nursing home property. Mr. Maury Whitfield bought out his brother's share of the nursing home. When Mr. Maury Whitfield died his wife and daughter continued the family tradition of running Whitfield Nursing Home. Current Owner, Jenny Whitfield Hibbard has been the shareholder and administrator of the nursing home since June 1, 1988 and is the sole owner of the facility. Whitfield Nursing Home has been in the ownership of the Whitfield family for almost 100 years, and it continues to be owned by the Whitfield family.

The house where Proper I Supervised Living is located was built as a private residence. The supervised living home is located in a residential neighborhood with homes beside, behind and across the street. There are other private residential homes located on the other side of the nursing facility. See pictures provided by Region IV attached to the summary report.

**Summary of Initial Assessment Findings**

**11/05/2018**

- 1D)** Site is located next to a nursing facility.
- 1Q/12K)** Individuals have limited access to their money.
- 7B)** Individuals do not have keys to the home.
- 9A)** Visitors are required to sign-in.
- 10A)** Setting is not accessible to those who utilize mobility devices.
- 10B)** Individuals do not have access to the entire house as the upstairs is sectioned off with rope and only the rear is accessible by wheelchair.
- 11P)** Individuals are required to eat at the table.
- 11Y)** Individual does not have key to home.

**Compliance Validation Narrative with Provider Input**

**6/29/2020, 10/21/2021**

- 1D)** The location of the Proper I supervised living home is next door to a nursing home that is not owned by Region IV MHS. The nursing home is in the middle of a community of personal/ family homes. Proper I Supervised Living Home is in no way connected to the nursing home next door.
- 1Q/12K)** Region IV serves as Representative payee for two of the four people living in the home. The two people had a representative payee prior to coming to Region IV. Each person and their family requested the provider continue the responsibility. Each person has access to their money at all times. Each individual can speak to the Representative Payee at any time to get anything they need or any amount of money they want to withdraw as long as they have it available in the bank. The Representative Payee is available to the individuals at the home at all times. The Supervised Living Director meets with each individual on a monthly basis to go over the individual's bank statement, discuss budgeting, purchases the individual has made or wants to make, so the individual will understand how much money they have available to spend on items of their choice. Staff work with each individual on independent living skills such as paying rent, budgeting for groceries and toiletries, internet, phone, etc. Staff will discuss with the individual what is important to and important for in regards to the independent living skills with money. Individuals can meet with their Representative Payee at any time to discuss their account and/or to get an up-to-date balance.
- 7B/11Y)** Each person at Proper I Supervised Living Home has individual keys to their bedroom doors and can lock his door when it is his choice. The Supervised Living director met with each individual at the home in individual meetings to discuss whether each individual wants a key to the front/ back door of the supervised living home. Individuals all stated no they did not want keys to the front/ back door of the supervised living home. At any time the individual states he wants a key to the home then a key will be provided to the individual. A form was signed by the individual and witnessed by the Supervised Living director specifically stating whether: 1. The individual wanted a key to the supervised living house front/ back door and was given a key or 2. The individual did not want a key to the supervised

living house front/ back door. A copy of the form will be kept in Region IV MHS online medical records on the admissions tab and available for DMH review.

**9A)** Visitors are not required to sign in or out at the supervised living home. Staff were trained regarding specific person-centered practices and least restrictive environment regarding visitors for the individuals at the Supervised Living Home.

**10A)** There are three doors available to individuals at the Supervised Living home. One door is the front door and there are steps with no ramp. The two back doors are ground level and accessible by wheelchair. A wheelchair ramp was installed at the front door to make all entrances/ exits at the home wheelchair accessible. This was verified during the validation process.

**10B)** Proper I Supervised Living home has a storage area located upstairs in the home. All living space, kitchen, bedrooms, bathrooms are located on the main floor and people have access to all areas. The storage area is locked and maintained by staff. The home has a ramp at the back door for accessibility for people with limited ambulation. However, the front door did not have a ramp for accessibility for someone using a wheelchair or with decreased physical abilities. The provider built a ramp at the front entrance.

**11P)** Individuals are supported to eat anywhere on site, including the kitchen, common areas inside, and outside.

**Evidence Submitted for DMH Review**

Pictures of Accessibility Ramp

Grievance Procedures

Lease Agreements

Monthly House Member Meeting Form

Staff Training Records

Individual Rights Form

Notice of Privacy Practices Form

Policies and Procedures

Pictures of Property Location

**Compliance Summary**

<b>Compliant?</b>	<b>Federal Requirement</b>	<b>Summary of Evidence of Compliance</b>
<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>The setting is located in a commercial area where individuals have regular access to the community.</p> <p>Activities are provided in the setting on a daily basis and people engage in activities in the community to develop their social, purchasing, and communication skills. Individuals regularly interact with members of the broader community while shopping, spending time at the park, and participating in local festivals.</p> <p>Staff members assess people individually to learn more about their required supports, preferences, goals, and interests.</p> <p>Provider completed a remediation plan to ensure that individuals have access to their money as desired or as described in their PSS. Staff will work with each individual on independent living skills such as paying rent, budgeting for groceries and toiletries, internet, phone, etc. Staff will discuss with the individual what is important to and important for in regards to the independent living skills with money.</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 flexibility in their daily schedules and are able to engage in the activities of their choosing. Staff members work with individuals in selecting activities based off of their personal preferences and information in their support plans.</p> <p>People have flexibility in when they can eat and take breaks on site.</p>
<p><i>42 CFR § 441.301(c)(4)(iii)</i></p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> Partial</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 able to keep their personal belongings secured on site.</p>

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<input type="checkbox"/> No		<p>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>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>
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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 offers a variety of spaces for individual and group activities.</p> <p>All staff members are trained on person-centered planning and noted that each person has the choice of participating in group and individual activities throughout the day. They added that information about individual's preferred activities can be found in PSS and in an individual's weekly notes.</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 checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</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</p>	<p>Each individual in the setting has a lease that is reviewed with staff members annually. Information in the lease includes: eviction, termination, relocation, and the appeals process.</p>

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<input type="checkbox"/> Not Applicable	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 style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(B)</i></p> <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 or living units within the lease or other agreement.	Each person in the home is individually assessed to determine if they would like to have a key to their bedroom and to the home. This information is reviewed at least annually and these options are documented in each person's PSS.
<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.	Individuals review their rights regarding eating meals at the time of their choosing and rights to control/plan their activities and schedules during monthly meetings. Staff members are trained on individual rights.  People are able to choose where and when they eat in the setting and staff members are trained to support these choices. Individuals with dietary restrictions have this information included in their PSS. People are able to keep personal snacks in their personal bedrooms if desired.
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(D)</i></p> <input checked="" type="checkbox"/> Yes	Individuals are able to have visitors of their choosing at any time.	The setting completed a remediation plan and revised their visitor policy. People are informed of their rights to see their visitors at the place and time of their choosing. People are reminded that they can invite friends and family into the setting as desired.

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<input type="checkbox"/> Partial <input type="checkbox"/> No		
<p><i>42 CFR § 441.301(c)(4)(vi)(E)</i></p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No	<p>The setting is physically accessible to the individual.</p>	<p>The setting is physically accessible for those who require the use of a mobility device. All people have access to common areas. Assistive devices are available to individuals as needed or desired.</p>



Whitfield Nursing Home (left) privately owned by Jenny Whitfield Hibbard

Proper I Supervised Living Home (right) operated by Region IV





Picture of private residences located across the street from Proper I Supervised Living Home (left side of home)



Proper I Supervised Living Home (left) operated by Region IV with other privately owned residences on same side of street.





Private residential street located behind Proper I Supervised Living Home





Picture of private residences located across the street from Proper I SVL  
(right side of street)



Picture of residences located directly across the street from Proper I SVL