



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

*Summary Sheet*

<b>Provider Name</b>	St. Francis Community Services
<b>Setting Name</b>	Bridgeway Apartments SSPL
<b>Setting Address</b>	
	Picayune, Mississippi, 39466
<b>Original Site Assessment Date</b>	December 02, 2018
<b>Validation Date</b>	June 30, 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 an apartment complex in a mixed residential and commercial setting. It is surrounded by private residential homes, additional apartments, and a laundromat and funeral home are located within walking distance of the site. A large wooden privacy fence surrounds the apartment complex and has an iron entry gate.

**Summary of Initial Assessment Findings - 12/02/2018**

- 1C/4A)** There is a privacy fence, and the gate is locked at 10pm each night, as long as people are able to exit or enter in case of an emergency this should not be a problem.
- 1E/F)** There are three shared supported living settings at this same location and two Supported Living settings directly outside the gate all operated by the same provider.
- 1Q)** People are given weekly funds to manage by the staff.
- 3C)** It did not appear that all personal information is kept securely.
- 3L)** Staff did not know if people are informed of their rights upon admission or annually thereafter.
- 3O)** The site is not free of employee postings.
- 4N)** People are required to be in their apartments by 10pm with the door locked. People can go to bed when they desire.
- 6A)** Staff did not know if people had leases.
- 8D)** Staff stated that two people have locked refrigerators and cabinets based on doctor's orders and these restrictions are noted in their service plans. One person has a monitor in his unit so staff can hear him to be sure he is not choking; it was not noted if this is in the person's service plan
- 9A)** Visitors must sign in and out.
- 9B)** Staff indicated that people can have visitors at any time during the day but they were not sure about what restrictions were in place in the evenings. Families can come visit any time.
- 9D)** Visitors must be on an approved list to visit.
- 11E)** Individual had somewhere else they wanted to live.
- 11H)** One individual said he would go to his apartment and sleep if he had a problem (it was not clear if he knew who to contact)
- 12I)** One individual did not control his own money.

**Compliance Validation Narrative with Provider Input**

**6/30/2020**

- 1C/4A)** Provider explained that each person on site is able to come and go as they please. They said each person in the setting has been assessed regarding access to the setting and the exterior gate. They described that while the gate is currently broken, that it remains closed in the evenings at the behest of the individuals in the setting, noting that this information is documented in meeting notes and in individuals' support plans.
- 1E/F)** Provider explained that two sites share 3 acres of land, adding that this land is surrounded by a neighborhood consisting of non-disabled 1–3-bedroom apartments and small family homes. They said these two sites are the only two within 5 miles that are specifically for ID/DD individuals. They said each person has an individualized support plan that outlines their interests and goals in the community.
- 1Q/12I)** Provider stated that each person in the setting is individually assessed to determine if they need assistance and monitoring when it comes to their personal resources.
- 3C)** Provider explained the new process for providing medication assistance and discussing personal health information with individuals onsite. They said staff members assist one individual at a time in a private closed room or office. They said staff members were trained on the importance of privacy and confidentiality, stating that HIPAA is reviewed upon hire of new employees and annually thereafter. They noted that this change to more individualized and private assistance has enabled individuals to get more personal attention from staff.
- 3L)** Provider stated that staff members reviewed individual rights and the grievance procedure during the admissions period and at least annually thereafter. They said this information is recorded in the individuals' plan and individuals have regular discussions about these topics with staff. Provider met with staff members to ensure they are reviewing rights and that information about rights and the grievance procedure can be found throughout the setting.
- 3O)** Provider said and displayed that all employee postings were removed from the common areas of the home and are no longer in view of individuals in the setting.

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

*Setting Summary Sheet*

**4N)** Provider explained that there are no formal rules regarding bedtimes each evening. They said staff encourages people to get a good night's rest and ask that people do not disturb one another while others are sleeping. Provider explained that they request individuals to refrain from going to the community room after 9pm, noting that this area is in the middle of the house and various bedrooms surround it; however, they noted that people are still supported to spend time in this area "after hours" if they do not disturb other individuals sleeping nearby. They said policies and procedures have been added to ensure staff understand the process going forward for supporting individuals to go to bed and/or sleep as desired.

**6A)** Provider stated that each person has a lease that is developed by HUD and applies to each person in the home.

**8D)** Provider said individuals are free to eat wherever, whenever, and whatever they prefer, as long as they are not restricted by their physician.

**9A/B)** Provider stated that visitors will no longer be required to sign in or adhere to specific visiting hours. They said people and their legal representatives complete a visitation agreement during the admissions period and that this form is updated and reviewed annually. They said this agreement is signed and located in a person's program file. They said people can utilize this document to specify who they do and do not wish to see while on site. They said people are able to request certain individuals to stay away from the home if desired, noting that all of this information is documented on the person's visitor agreement. This policy was shared during the validation process.

**9D)** Provider stated that individuals are supported to answer the door for guests as desired but stated that people rarely do. Provider said they met with staff members to ensure they are supporting people to open the door for guests if desired.

**11E/H)** Provider explained that individuals are informed of their rights regularly through formal meetings and casual conversations. They said if an individual is not happy with services or where they are living, that they assist individuals in contacting their Support Coordinator so that changes can be made to individuals' support plans or to their residence.

Evidence Submitted to DMH for Review: rights and responsibilities policies and procedures, admissions policies and procedures, training curriculum/records, copy of a lease agreement and telephone/visitation agreement.

**Compliance Summary**

<b>Compliant?</b>	<b>Federal Requirement</b>	<b>Summary of Evidence of Compliance</b>
<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 is in the process of fixing the motor on the electronic gate located around the apartment complex. Each person is individually assessed to receive a gate code and come and go from the setting as desired. Staff members are trained to discuss this information with individuals upon admission and annually at the PSS meeting. Staff members are trained that each person has the right to come and go as they please.</p> <p>The setting completed a remediation plan and staff members are trained to promote integration and inclusion for all individuals served on site. They said each person has an individualized support plan that outlines their interests and goals in the community.</p> <p>Staff members work with individuals on their money management skills and meet with individuals monthly to review their budgets.</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-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>Individuals have flexibility in their daily schedules and activities are adapted to individuals' preferences, needs, and goals based off of daily discussions and information found in support plans. One person lives in each apartment and are aware of this when choosing the setting.</p> <p>People decorate and furnish their apartment as desired and have the option of requesting basic furniture from the provider if desired.</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>Individuals are able to decorate and furnish all parts of their apartment. Staff members only discuss information with authorized individuals and all personal information and documentation is kept in a secure location.</p> <p>Individuals live alone in their apartments and are supported to have privacy when engaging in personal activities.</p>

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

		<p>Staff members do not utilize restraints and are trained in de-escalation techniques.</p> <p>The setting completed a remediation plan, and all staff members are trained to inform individuals of their rights during admission and annually thereafter during the PSS process. Rights are reviewed with individuals during regular conversations and copies are given to individuals and their family members/guardians.</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 places for people to spend time including indoor, outdoor, and group spaces. Individuals reside in their own apartments and are supported to live out their lives and engage in activities as desired. Supervision and assistance are provided based off of information found in a person's support plan.</p> <p>Individuals have opportunities to engage in the activities of their choosing. The setting completed a remediation plan and is in the process of fixing the motor on the electronic gate located around the apartment complex. Each person is individually assessed to receive a gate code and come and go from the setting as desired. Staff members are trained to discuss this information with individuals upon admission and annually at the PSS meeting. Staff members are trained that each person has the right to come and go as they please.</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>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>The unit or dwelling is a specific physical place that can be owned, rented, or occupied under a legally</p>	<p>Each person has a rental agreement that is signed by the individual and reviewed annually.</p>

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

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input type="checkbox"/> Not Applicable	<p>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 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	<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.          (3) Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.</p>	<p>The setting completed a remediation plan and explained that all bedroom doorknobs and locks were switched out and replaced with keyed locks with the goal being that each individual has their own key to the setting and to their bedroom. Provider said individuals are informed of the key policies during the orientation period and stated that these policies are reviewed annually during the planning meeting and documented in each person's individualized support plan.</p> <p>The setting completed a remediation plan and trained all staff members that individuals are able to close and lock the bathroom door as desired. This topic is trained and discussed monthly and documented in each employee's training notes.</p>
<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	<p>Individuals have the freedom and support to control their schedules and activities and have access to food any time.</p>	<p>Individuals always have access to their own kitchen and food pantries. People are supported to purchase their own groceries and prepare their meals as desired. Staff members are available to provide assistance as needed according to individuals' preferences and information documented in support plans.</p>
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(D)</i></p>	<p>Individuals are able to have visitors of their choosing at any time.</p>	<p>The setting completed a remediation plan and stated that visitors will no longer be required to sign in or adhere to specific visiting hours. They said they provided training on this issue to staff</p>

**Mississippi Home and Community-Based Services  
Heightened Scrutiny Evaluation**  
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<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No		<p>members during a January 2020 staff meeting and stated that revisions were made to the Visitor Guidelines, New Visitor Information Book, and individual's Visitor Agreements. They said people and their legal representatives complete a visitation agreement during the admissions period and that this form is updated and reviewed annually.</p>
<p>42 CFR § 441.301(c)(4)(vi)(E)</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 home was observed to be physically accessible to all individuals living in the home. Should an individual need any assistive devices, the setting would support the individual in providing what was needed.</p>