



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

Summary Sheet

Provider Name	St. Francis Community Services
Setting Name	Bridgeway Apartments
Setting Address	
	Picayune, Mississippi, 39466
Original Site Assessment Date	December 02, 2018
Validation Date	June 30, 2020

Setting Type

- Supervised Living
- Shared 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

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

- 1B) There is a wooden privacy fence and iron entry gate. The gate is left unlocked and open during the day and locked at 10 pm each evening.
- 1C) There is an iron entry gate that is locked at 10pm each evening.
- 1E) The provider operates another site in the immediate area.
- 1F) There is another home in the immediate area where people with disabilities live together.
- 1Q/12I) Limited access to money.
- 2G) Individuals do not have a choice of housemates.
- 3A) Common living area observed to be decorated by staff.
- 3C) Information about people living in the home is not kept private/confidential.
- 3L) Staff are unsure if individuals are informed of their rights upon admission and annually thereafter.
- 3O) Employee information is present in common areas and visible to residents.
- 4A) A fence and locked gate prevent movement at night.
- 4C) Staff share that individuals may not choose age-appropriate events.
- 4H) People do not have access to their money.
- 4N) Individuals are supposed to be in their apartments by 10 pm.
- 6A) Staff unsure if everyone has a legally enforceable lease or agreement.
- 7C) No locks on bathroom doors, but people have individual apartments.
- 9A) Visitors must sign in and out.
- 9B) There are possible visitor time restrictions for people who are not immediate family.
- 11D) Individual reports they did not choose to live in this home.
- 11F) Individual reports they were not informed of private bedroom situation. Site Assessor was informed the person was moved to the Supervised Living setting from the Shared Supported Living site due to health needs.
- 11O) Individual reports he does not eat at the time he wants. However, he has medical restrictions and doctor's orders.
- 11V) Individual reports he is unsure if he is listened to at the person-centered care planning meeting.
- 12B) Individual reports he does not have keys to his bedroom.
- 12G) Individual reports they only open the door for visitors at the instruction of staff.
- 12H) Individual does not get to choose hair style.
- 12I) One individual mentioned not having control of their money.

Compliance Validation Narrative with Provider Input

6/30/2020

- 1B/C/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 explained that each individual creates a monthly budget to determine their weekly spending money. They said that while all individuals are on fixed incomes, people enjoy working with staff to count their income and document routine expenses. Provider noted that money management skills instill confidence in people and help them to become more autonomous. They said individuals sit down with staff members and a supervisor to work on a monthly budget worksheet. They said they use

this document to assist the person in how much money is required to pay their rent, bills, and other utilities. They said once the balance sheet is complete that the person, staff, and supervisor sign the completed balance sheet and that copies are placed in the individual's support plan and their finance folder. They said people enjoy going through this process, in addition to writing out their bill payments, writing checks, and going to the bank to cash checks. They stated that each person's money management support needs are documented in the PSS, but money management education is recorded in each person's IDD service notes.

2G) Provider stated that individuals are supported to visit and tour the setting before deciding to live on site. They stated that individuals in the home are able to meet with their potential housemate to determine if the fit will work well for all parties. Individuals' preferences and needs are always considered before determining fit.

3A) Provider stated that individuals are supported to decorate all parts of the home including the living room, dining room, and bedrooms. Individuals assist with picking out items and make suggestions about items they would like to have in the common areas.

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 explained that each apartment has a checklist that has been implemented for both staff and individuals onsite. They said the checklist contains various cleaning tasks for their apartment to have completed and checked off. This was also designed for communication between staff members after each shift. Provider explained that individuals enjoy engaging in chores and other cleaning activities around the site, adding that this information is documented in each person's activities plan. Provider noted that people have the option of not completing the checklist if they do not want to, adding that the checklist had been moved from the refrigerator to a more private area inside the pantry. They noted that people still have access to the checklist should they want to complete some of the cleaning activities but acknowledged that its new location felt less institutional in nature. They stated that staff members will assist individuals with cleaning activities as preferred.

4C) Provider said the site provides guiding principles for age appropriateness by providing access to age-appropriate materials and subjects. They said individuals are provided educational opportunities to learn about a variety of topics that are offered as a group or on an individual basis, noting that specific topics for individuals are tailored to their specific interests and strengths as determined in the support plan. They said these topics provide individuals with the information they need to live a "healthy and meaningful life" as adults. They said each month new educational topics are discussed and rotated throughout the year. They said individuals are encouraged to make suggestions about new topics and can be assisted with brainstorming topics to choose from each month by staff members. They described this process as "an interactive learning experience" that is ever evolving.

4H) Provider stated that educational information is provided to individuals on site by conducting monthly meetings that cover specific educational topics. They said these topics are rotated throughout the year based on individual's preferences and suggestions and added that these meetings are interactive. They described and displayed the following examples: Universal precautions, medical safety, environment safety, and money management. They said staff document persons who are in attendance as well as the topics discussed during the meeting, suggestions for additional topics, and

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issues or concerns. This documentation is housed in the "education binder" which can be pulled for PCP planning as needed.

4N/11O) Provider stated that individuals are able to wake up and go to bed as desired. They stated that meals are generally made at specific times, but people are supported to eat when they are ready and wake up and go to bed as desired. Provider met with staff members to ensure each individual is being supported as to when they would like to start and end their days. Additionally, individuals have choice in when they wish to eat and enjoy their meals. This information is documented in each person's plan.

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

7C/12B) Provider stated that each person has their own individual apartment, and they are able to lock the doors of their choice to attain their preferred amount of privacy.

9A/B/12G) 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.

11D/F/V/12H) 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, activity services policies and procedures, training curriculum/records, copy of a lease agreement and telephone/visitation agreement.

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 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 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>

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		<p>Individuals live alone in their apartments and are supported to have privacy when engaging in personal activities.</p> <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>
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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>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</p>
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		they need to make a request for additional services or to make changes to their Activity Support plans.
<p>42 CFR § 441.301(c)(4)(vi)(A)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input 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>Each person has a rental agreement that is signed by the individual and reviewed annually.</p>
<p>42 CFR § 441.301(c)(4)(vi)(B)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p>	<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>

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<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>	<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>42 CFR § 441.301(c)(4)(vi)(D)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</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 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> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	<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>