



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

*Summary Sheet*

<b>Provider Name</b>	Willowood Developmental Center
<b>Setting Name</b>	North Willows Apartments
<b>Setting Address</b>	
	Jackson, Mississippi, 39206
<b>Original Site Assessment Date</b>	September 26, 2018
<b>Validation Date</b>	June 26, 2020

**Setting Type**

- Supervised 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 a gated apartment complex in a residential setting. Other apartments are seen nearby. Setting is surrounded by a high fence and gate, which can be opened or closed with a gate code.

**Summary of the Assessment Findings - 9/26/2018**

- 1B)** Site surrounded by a high fence.
- 1C)** Site surrounded by a high fence. People must have a code or be buzzed in to gain access.
- 1E)** Shared supported living home located across the parking lot.
- 1F)** Supported living home on the other side of the parking lot.
- 1I)** Staff report people must travel together as a group.
- 1M)** Staff were unable to provide details on individualized schedules.
- 1N)** People are unable to access the staff office or go outside unless supervised.
- 1Q)** Staff maintain control of each person's money.
- 2A)** Setting does not provide individuals with flexibility in their schedules.
- 2B)** Individuals must participate in group activities regardless of preference.
- 2G)** People do not have a choice of housemates.
- 2H)** People do not decorate their bedrooms in the manner of their choosing.
- 3A)** Individuals do not decorate the common areas of their home.
- 3B)** Furniture shows wear and tear.
- 3C)** Personal information is not kept in a secure location.
- 3H)** No privacy for phone calls.
- 3I)** Staff indicated they choose activities for the individuals.
- 3J)** Unclear on behavior support plan
- 3K)** No secure place for personal belongings
- 3L)** Staff unsure of when people were informed of rights.
- 3M)** Staff are unsure of when people are informed of the process for filing grievances.
- 4A)** Staff office remains locked, and people are unable to enter and exit without buzzing in.
- 4C)** Tasks and activity are not individualized to attributes of people in the home.
- 4E)** Alternative meals are not generally provided.
- 4F)** People do not have open access to food.
- 4G)** Visitors must call ahead of time before meeting people in the home.
- 4H)** Staff maintain control of individual's money and were unsure if people knew about voting and religion.
- 4I)** People must stay with the group or attend day programs.
- 4J)** Not enough staff to allow a housemate to stay home when others want to go out.
- 4K)** No evidence was provided to indicate that people are given the choice to participate in menu planning and cooking activities.
- 4M)** No flexibility with wake-up times
- 4N)** No flexibility with evening routine
- 5A)** People do not have an option of who provides them support.
- 6A)** Leases exist, but staff does not know location.
- 7A)** People do not have keys to their rooms.
- 7B)** People do not have keys to the home.
- 8A)** No flexibility in mealtimes.
- 8B)** Group choice in restaurant locations.
- 8C)** Limitation in location of eating.
- 8D)** Restrictions of food access.
- 9A)** Visitors not required to sign in or out but must contact staff before a visit.
- 9B)** Visitors must contact staff prior to a visit.
- 9D)** Staff must assist guests to enter the site.
- 11B)** Unable to choose whether he runs errands.
- 11D)** Individual did not choose home.
- 11E)** Individual preferred different home.
- 11G/J)** Individual did not answer the question.

- 11L)** Individual did not answer the question but staff stated there is no secure location.
- 11M)** Individual did not answer the question.
- 11N)** Unable to choose what he wants to eat.
- 11O)** Unable to choose the time he eats.
- 11P)** Unable to choose where and with whom he eats.
- 11Q)** Always sits next to the same person.
- 11R)** Individual must go to bed and wake up at the same time every day.
- 11V)** Individual did not answer the question.
- 11W)** Individual did not answer the question.
- 11Y)** Does not have a key to home.
- 12A)** Cannot lock his bedroom door.
- 12B)** Does not have a key to his bedroom.
- 12C)** Individual did not believe he could lock his bathroom door.
- 12D)** Individual must run errands as a group.
- 12G)** Unable to let visitors in the house.
- 12H)** Individual did not respond.
- 12I)** Does not control own money.

**Compliance Validation Narrative with Provider Input**

**6/26/2020**

**1B/C/4A)** Individuals chose to keep the fence onsite for safety and security purposes. Each individual was individually assessed regarding the gate and provided with instruction on how to come and go from the setting.

**1E/F)** Each setting operated by the provider in the immediate area has a separate schedule and operates independently from one another.

**1I/11B/12D)** Additional staff members are available on site to provide transportation if individuals wish to run errands independent from other individuals in the home. Individuals are supported to choose who they run errands with offsite.

**1M)** Individuals are supported to choose their preferred activities on and off site. Additional staff members are available to provide additional support or assistance if people want to focus on individual activities. Information about preferred activities and interests are documented in individuals' plans.

**1N)** Provider noted that staff will only assist individuals when going outside when a person has documented fall or safety risks. They said this documentation can be found in an individual's PSS, adding that additional notes on this topic also appear in a person's ASP.

**1Q/12I)** Provider noted that each individual's PSS documents their preferred access to personal resources and funds. They noted that restrictions of individuals keeping their own checkbook or money are documented in the PSS, adding that money management programs are individualized to each person's needs, desires, and goals.

**2A/B/3I/11D/E)** Provider described how each person on site has an individualized person-centered plan, adding that all individuals also have individualized schedules. They said the PSS and personal schedules are formally reviewed every 6 months but added that changes can be made as needed to support an individual's wants and needs. Information reviewed includes where individuals wish to live, as setting options are also reviewed at this time.

**2G)** Provider explained the site had developed a new admissions process that more carefully involved individuals in the setting. They showed and described their admissions checklist which ensures that each prospective "housemate" has the ability to tour and meet each individual in the setting. They said individuals then have a discussion regarding the new person to see if everyone feels like it is a good fit.

**2H/3A)** Provider said the site altered their previous policy on site decor so that individuals could be in charge of the decorating process. They said the group decided to update the dining room, visiting area, and living room.

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**3B)** Provider said furniture is swapped out and replaced as wear and tear become evident. They said furnishings in the setting are clean and fully functional. Providers met with staff to discuss cleanliness and ensure that all furnishings in the setting were suitable.

**3C)** Provider explained that individual's confidential information is stored in a locked drawer in the manager's office. They said people are able to access their information at any time while accompanied by the site coordinator or manager.

**3H)** Provider said all individuals are provided space and opportunity to conduct their personal business in private. They displayed the newly decorated area of the house that individuals set up for private dining and visitation.

**3J)** Provider stated that each staff member has been trained to ensure that blanket restrictions are prohibited. They said individuals onsite are also trained and reminded of their rights to ensure there are no blanket restrictions in the home. They noted that all individual restrictions are documented in a person's PSS/ASP and explained that staff are consistently reminded to refer to each person's individualized documentation when supporting them onsite. Provider noted that supervisors often check in with staff members to ensure they are not utilizing blanket restrictions when supporting individuals on and off site.

**3K/11L)** Provider said each person was given the option of having a lock for their closet or a personal locking device. They displayed these changes in one person's room during the discussion. They said this information is addressed and documented in each person's PSS.

**3L/M)** Provider said individual rights and the grievance procedure are discussed upon admission and annually thereafter or as needed. They said this information is addressed and reviewed in each person's PSS.

**4C)** Provider explained that each staff member was trained on how to identify activities that match individual's age, skills, desires, and goals through information obtained in the PSS. They explained that individualized schedules are reviewed at least once a month but noted that less formal discussions may take place throughout the week if people wish to make changes to their daily activities.

**4E)** Provider explained that individuals on site had recently created private dining and multipurpose space for people who wish to be alone or meet with friends and family in private. They said people are supported to eat wherever they prefer onsite, whether it be their bedroom, dining room, living room, or outside.

**4F)** Provider noted that restrictions on food and specific diets are documented in the PSS and ASP. They said individuals on site enjoy discussing menu planning, healthy eating, and individual preferences specific to food and dining during monthly Program Participant Meetings. They said staff members are trained regarding individual's access to food and any individual restrictions outlined in a person's PSS.

**4G)** Provider reviewed the Willowood visitation policy, noting that visitors are welcome to visit people at any time that is convenient for both the visitor and individual on site. They said staff are trained to support individuals in seeing their friends and family, adding that staff is always available if someone needs assistance visiting the community to meet with whomever they choose.

**4H)** Provider explained that each person onsite has their own PSS that is individualized and documents each person's specific preferences on access to the community, religion, money management, voting, and activities on and off site. They said staff are in serviced to utilize each person's individualized plans to support their wants and needs throughout the day and night. They said individuals are able to review and discuss their rights during monthly Program Participant Meetings or as needed. They said rights are also reviewed annually at the time of the PSS.

**4I/J)** Provider explained that ample staff is available if a person decides they want to stay home rather than be required to participate in day programs or their places of employment.

**4K)** Provider explained that menu planning is incorporated into monthly Program Participant Meetings. They said some individuals choose to shop on specific days as noted in their individual schedules. They said people have the option to cook for themselves, ask staff for assistance, or assist staff in cooking when housemates choose to share a meal.

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**4M/N/11R)** Provider said individuals have full flexibility to wake up and go to bed whenever they choose. They said staff members are trained to support individuals in sleeping and waking whenever they choose. They noted that there are no "bedtimes" or "wake up times" in the setting and stated that each person goes to bed and wakes up as desired.

**5A)** Provider said they have ample staff members available if a person prefers one staff member over the other. They said they check in with each individual in the setting to ensure they are satisfied with their services and with those who are providing them. Individuals with specific needs (language/communication) have this information documented in their IPPs.

**6A)** Provider explained that all Willowood Supervised Living homes are HUD-owned and noted that each person onsite has a lease. They said the process for admission and lease information is described in the Program Handbook.

**7A/B/11Y/12A/B/C)** Provider said each person on site was assessed for their desire to have and ability to manage keys to their home and bedroom upon admission, once annually thereafter, or whenever requested. They noted that and displayed that this was part of their Admissions Policy/Checklist. They said each person's key assessment was carefully documented in the person's individualized PSS. Additionally, individuals are supported to close and lock the bathroom door.

**8A/B/C/D/11N/O/P/Q)** Provider said individuals review their rights regarding eating meals at the time of their choosing during the monthly Program Participant Meeting but added that these rights can be reviewed as needed throughout the day to ensure individuals are eating when, where, and what they prefer.

**9A/B/12G)** Provider explained that individuals are supported to have visitors over to the setting whenever they choose. They said the setting "belongs to the people onsite" and noted that they are able to mingle and hang out with whomever they choose. They said people are reminded that they can invite their friends and family into the setting whenever they want but noted that people are also informed of their responsibilities to the setting and their housemates when their friends and family come to visit. They said each person is reminded to invite whomever, whenever they prefer, but that they must ensure that these guests do not infringe on the rights and comfort of their housemates. Visitors are no longer required to sign in or out when visiting the site.

**9D)** Provider explained that each person is reminded of their right to independently allow guests to enter their home. They said each person on site was assessed regarding the process for using the gate code and their ability to manage that information safely so that they and their housemates remain secure.

Evidence Submitted to DMH for Review:

**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 assessed each individual regarding the gate code outside of the apartment building. Staff members were trained regarding the gate code assessment process and how to best support individuals. Individuals were individually addressed to gather their feedback on the high fence and individuals unanimously agreed that they would prefer to keep the fence and this information was documented in each person's file. Individuals are trained upon admission and regularly thereafter on how to operate the gate.</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>The setting completed a remediation plan and added more staff members to the site to provide services to ensure individuals have the support and assistance they need when on and off site. PRN staff are assigned to the home to ensure people have opportunities for additional support where needed.</p> <p>Formal meetings take place with staff and individuals regarding rights and activity planning but noted that less formal discussion often take place during the week to review individual needs and preferences.</p> <p>The setting completed a remediation plan and noted that staff will only assist individuals when going outside when a person has documented fall or safety risks. They said this documentation can be found in an individual's PSS, adding that additional notes on this topic also appear in a person's ASP. They noted that staff are trained to refer to each individual's PSS when providing support.</p> <p>Additionally, each person's PSS documents their access to their personal resources and funds. Staff members are always available</p>

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		to support individuals if they need assistance maintaining their funds.
<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>The setting completed a remediation plan and said trained staff in person-centered strategies and planning. Each person in the setting has a person-centered plan and changes are reviewed and documented every 6 months or as needed. Staff members are trained to frequently check in with individuals to ensure they are satisfied with their schedules and services.</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.</p> <p>The setting completed a remediation plan and implemented a new policy so that individuals are more involved with the process of when individuals tour the setting. People are informed that prospective house mates have the option of touring the site and people are able to provide input on those who wish to live in the house. Staff members are informed to receive feedback from each person to ensure all parties are comfortable with their living situation. This information is reviewed with each person upon admission and at least annually thereafter or as needed.</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>The setting completed a remediation plan and altered their policy on how individuals can decorate the common areas of the setting. Individuals are now supported to provide input and decorations for the common areas of the setting. Individuals are engaged in regular discussions by staff members to provide creative ideas about the settings aesthetic.</p> <p>All confidential information is stored in locked cabinet to ensure unauthorized individuals do not have access to these records. Staff members participate in monthly HIPAA trainings to ensure they are aware of the importance of confidentiality and personal rights.</p> <p>The setting completed a remediation plan and assessed all individuals regarding phone usage and reminded them of their rights regards to the house phone, privacy while using the phone, and the right to have a personal cell phone. Staff members have</p>

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		<p>been in-serviced on these assessments and the rights of individuals.</p> <p>The setting completed a remediation plan and each staff member has been trained to ensure that blanket restrictions are prohibited. Individuals onsite are also reminded of their rights. Individual restrictions are documented in each person's PSS. Supervisors check in with staff members to ensure they are not utilizing blanket restrictions when supporting individuals on and off site.</p>
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<p><i>42 CFR § 441.301(c)(4)(iv)</i></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 completed a remediation plan and explained that each staff member was trained on how to identify activities that match individual's age, skills, desires, and goals through information obtained in the PSS. They explained that individualized schedules are reviewed at least once a month but noted that less formal discussions may take place throughout the week if people wish to make changes to their daily activities.</p> <p>The setting completed a remediation plan and created private dining and multipurpose space for people who wish to be or dine alone. People are supported to eat anywhere in the setting and staff members are trained on individuals' rights to do so.</p> <p>The setting completed a remediation plan and implemented new policies so that individuals have regular access to food in the setting. Staff members are trained to engage individuals in regular discussions about menu planning, healthy eating, and individual preferences. Additionally, staff are trained to support individuals in seeing their friends and family. People are able to see their visitors as desired, including in their bedrooms and common areas.</p> <p>Each person's PSS documents their preferred activities, including their religion and how they like to worship. People are able to choose their own activities or remain at home if they do not want to participate in activities in the community. The setting completed a remediation plan and hired additional staff to provide support to individuals on and off site as needed.</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 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><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>This home is HUD-owned, and 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.</p>	<p>The setting completed a remediation plan and assessed each individual on their desire to have and ability to manage keys to their home and bedroom upon admission, once annually thereafter, and as requested. This information is part of the admissions policy. Staff members are trained regarding these procedures and told to carefully review each completed assessment. Each person is offered the opportunity to have a key to their bedroom, their home, and the electronic gate surrounding the apartment building.</p>

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	(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> <p style="text-align: center;"><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>The setting completed a remediation plan and altered their policy on mealtimes. Individuals review their rights regarding eating meals at the time of their choosing during monthly meetings. Staff members are trained on individual rights.</p> <p>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 marked in their PSS. People are able to keep personal snacks in their personal bedrooms if desired.</p>
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(D)</i></p> <p style="text-align: center;"><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>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. This information is updated in the Program Handbook, which is distributed to each individual.</p> <p>Additionally, individuals are supported to independently allow guests to enter their home. Each person in the setting is assessed regarding the process for using the gate code and the ability to manage that information safely.</p>
<p style="text-align: center;"><i>42 CFR § 441.301(c)(4)(vi)(E)</i></p> <p style="text-align: center;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> Partial <input type="checkbox"/> No</p>	The setting is physically accessible to the individual.	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.