



Home and Community Based Services Compliance Monitoring

Mississippi Department of
Mental Health

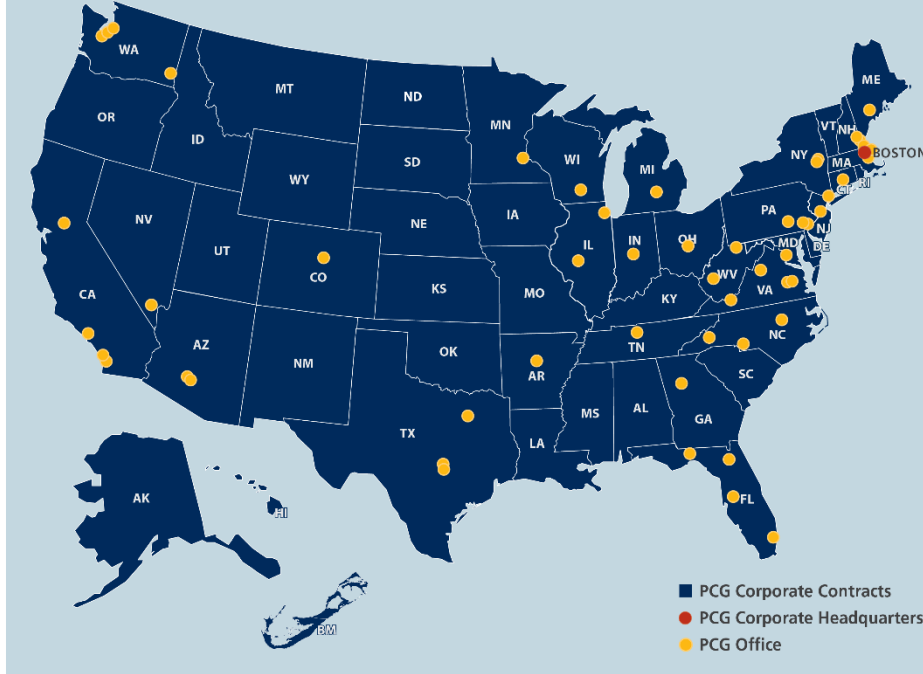
Site Assessment Overview

Introductions

Agenda

- ✓ Overview of PCG
- ✓ Site Assessment Overview
- ✓ Best Practices
- ✓ Next Steps
 - ✓ Remediation
 - ✓ Heightened Scrutiny Process
 - ✓ Moving Forward
 - ✓ Upcoming Trainings
- ✓ Questions





Public Consulting Group (PCG)

- Founded in 1986, PCG is headquartered in Boston, MA and employs more than 2,000 professionals in 60 offices
- Diverse workforce providing both consulting and direct services
- Projects covering states, counties, and local municipalities
- Five Practice Areas
 - Human Services, Health, Education, Technology Consulting, Public Partnerships, LLC (PPL)

PCG Human Services

HCBS Experience

- Work with CMS on behalf of state Medicaid programs for over 30 years
- Work with states as they've developed waivers and waiver services, state plan services, advance planning documents, and reformed their health care systems
- HCBS specific engagements include Final Settings Rule initiatives, including Statewide Transition Plans, site assessments, stakeholder engagement, and training.

PCG has extensive HCBS experience with the following states: CA, IN, MA, OH, PA, SC, NY, WI, MS, IL

Why We're Here

- ✓ Work with DMH to create a training and communications plan
- ✓ Develop guidance and trainings on topics related to achieving compliance with the HCBS Settings Final Rule
- ✓ Provide a broad overview of the findings from the site assessments
- ✓ Outline the next steps



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HCBS Site Assessment Overview



General Areas of Non-Compliance

- Staff “convenience”
- Limited individual choices/independence
 - Choice vs. Real Choice
- Money management
- Dignity of risk
- Limited choice in day program provider
- In the community vs. being around community activities
- Physical accessibility



Community Integration

- Trips to the community in groups
- Dignity of risk
- Lack of independence
- Age-appropriate activities



Support

Choice of Settings

- Support staff unsure of other setting options
- Choice of housemates
- Choice of where meals take place



Choice

Individual Rights

- Condition of homes, furniture
- Lack of privacy, confidentiality
 - Med management
 - Inability to lock doors
 - Storing belongings
 - Information on rights and filing grievances
- Employee labor postings



Autonomy and Independence

- Access to food
- Choice to remain home
- Visitors and privacy
- Lack of education on choices and options
 - Freedom to choose church/religious services
 - Voting
- Campus-like settings



Freedom

Choice of Services

- Person-centered policies and practices
- Lack of understanding of planning meetings
- Service plans not accessible in homes
- Residential and non-residential services are limited to same provider
 - Day programs are “THE” choice
 - Required attendance
- Meaningful choice



Physical Accessibility

- Limited bathrooms
- Accessibility to use doors/move throughout site
- Restrictions/barriers to outside



Access

Individual Interviews

- Staff interference
- Limited options compared to staff responses
 - Meal times
 - Running errands
 - Remaining home
 - Choice in setting
 - Privacy
 - Visitors



Prevocational Settings

- No community activities
- Reverse integration
- Onsite nursing, behavioral support
- Locked doors throughout settings, including bathrooms
- Job explorations – sole function
 - Once a month

Training Needs

- Person-centered thinking
- Person-centered planning
- Choice in setting
 - Non-disability settings
 - Housemates- process for identifying if home continues to meet their needs
- Supported Decision Making
 - Parent vs. guardian
- Privacy

Qualities of Isolated Settings

- Physical location
- Group activities
- Choices limited to staffing
- Little to no community interaction
 - Friends and visitors are from other provider homes in same area
- Blanket restrictions

CMS Guidance

Heightened Scrutiny

CMS Guidance on Heightened Scrutiny

- Presumed Institutional Settings
- Qualities of Isolating Settings
 - Design or model of service provision, individuals have limited, if any, opportunities for interaction in and with the broader community
 - Restrictions on individual choice to receive services or to engage in activities outside the setting
 - Physically located separate and apart from the broader community and does not facilitate individual opportunities to access the broader community

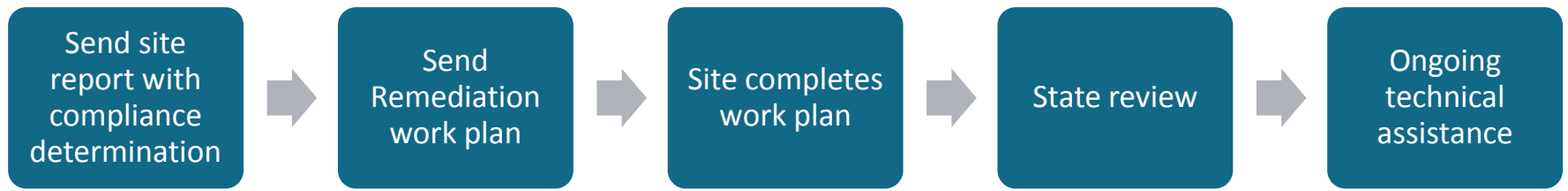
Best Practices

Best Practices

- Behavior Supports
 - Use of sensory rooms/calming areas
 - No restraint policies
 - Staff training
- Money management
- Individualization in homes

Next Steps

Remediation



Heightened Scrutiny Process



Moving Forward

- Ongoing communication
 - Updates to STP
 - Training options
 - Technical Assistance
 - Targeted guidance
- Ongoing Monitoring



Upcoming Trainings

Date	Time	Topic
Tuesday, May 7, 2019	9:00 a.m. - 10:30 a.m. CST	Individual Rights
Tuesday, May 28, 2019	1:00 p.m. - 2:30 p.m. CST	Achieving Community Integration
Wednesday, June 12, 2019	9:00 a.m. - 12:00 p.m. CST	Compliance with the HCBS Settings Final Rule

<https://www.surveygizmo.com/s3/4963055/MS-HCBS-Training-Webinars-Registration>

Questions

Exit Survey

<https://www.surveygizmo.com/s3/4970499/MS-HCBS-Training-Exit-Survey>

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