

## Package of Evidence Summary

### ORGANIZATION AND SETTING DETAILS

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| Organization Name:<br>Ragtime Industries |
| Phone:<br>641-932-7813                   |

|   |                            |
|---|----------------------------|
| Setting Name:<br>Ragtime Industries                           | Date of site review:<br>NA |
| Street address of setting:<br>116 North 2nd Street Albia Iowa |                            |

### FUNDING AND SERVICES IN THIS SETTING

Mark all funding sources and services provided in this setting.

| HCBS Waiver/Habilitation  | Service(s)  |
|---|---|
| <input type="checkbox"/> AIDS/HIV Waiver<br><input type="checkbox"/> Brain Injury Waiver<br><input type="checkbox"/> Children's Mental Health Waiver<br><input type="checkbox"/> Elderly Waiver<br><input type="checkbox"/> Health and Disability Waiver<br><input checked="" type="checkbox"/> Intellectual Disability Waiver<br><input type="checkbox"/> Physical Disability Waiver<br><input checked="" type="checkbox"/> Habilitation<br><input type="checkbox"/> Money Follows-the-Person (MFP)<br><input type="checkbox"/> Other: | <input type="checkbox"/> Adult Day Care<br><input type="checkbox"/> Assisted Living Service<br><input type="checkbox"/> CDAC Agency<br><input type="checkbox"/> Day Habilitation<br><input type="checkbox"/> Home Based Habilitation<br><input type="checkbox"/> Interim Medical Monitoring Treatment (IMMT)<br><input checked="" type="checkbox"/> Prevocational services<br><input type="checkbox"/> Supported Community Living (SCL)<br><input type="checkbox"/> Residential-Based SCL for children (RBSCCL)<br><input type="checkbox"/> Supported Employment<br><input type="checkbox"/> Intensive Residential Service (IRS)<br><input type="checkbox"/> Other: |

### ADDITIONAL DETAILS

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| List the number of HCBS funded members and non-HCBS funded members served in this setting. | HCBS funded: 14<br>Non-HCBS funded: 2  |
| Is this setting provider owned or controlled?  | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No   |
| Is this setting an existing location or a new or prospective location?                     | <input type="checkbox"/> Prospective<br><input checked="" type="checkbox"/> Existing<br><input type="checkbox"/> New ( <input type="checkbox"/> Check this box if the location is a newly constructed facility.) |

|   |  |
|---|--|
| <p><b>What category of heightened scrutiny applies to this setting?</b></p>     | <p><input type="checkbox"/> Category 1: Located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment</p> <p><input type="checkbox"/> Category 2: In a building on the grounds of, or immediately adjacent to a public institution</p> <p><input checked="" type="checkbox"/> Category 3: Any other setting that has the effect of isolating individuals receiving Medicaid HCBS from the broader community of individuals not receiving Medicaid HCBS</p>  |
| <p><b>What subcategories apply to this setting (select all that apply).</b></p> | <p><input type="checkbox"/> HCBS in ALF that are physically attached to a NF</p> <p><input type="checkbox"/> HCBS in larger than 3-5 bed RCF</p> <p><input type="checkbox"/> HCBS (such as ADC, DH, employment services) in an RCF, NF, hospital, or other facility</p> <p><input checked="" type="checkbox"/> Setting limits individuals' opportunities for interaction in and with the broader community, including with individuals not receiving Medicaid-funded HCBS due to the design or model of service provision.</p> <p><input checked="" type="checkbox"/> Setting restricts members' choices to receive services or to engage in activities outside of the setting.</p> <p><input type="checkbox"/> Setting is physically located separate and apart from the broader community and does not facilitate beneficiary opportunity to access the broader community and participate in community services.</p> <p><input type="checkbox"/> Clusters of sites including several units with people receiving HCBS in a multi-plex of any kind, clusters within neighborhoods, streets, communities, etc. that are clustered together by design for the purpose of receiving HCBS.</p> <p><input type="checkbox"/> Newly constructed facility</p> <p><input type="checkbox"/> Site is/was a facility converted to HCBS</p> <p><input type="checkbox"/> Quality of care concern related to HCBS settings requirements</p> <p><input checked="" type="checkbox"/> Site-based employment service such as a "sheltered workshop"</p> <p><input type="checkbox"/> Other:</p> |

## EXPLANATION

Home and Community-Based Services (HCBS), whether residential or nonresidential, must be provided in integrated, community-based settings that support members' full access 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 HCBS. HCBS services are required to be provided in such a way as to optimize individual initiative, autonomy, and independence in making life choices, including but not limited to daily activities, physical environment, and with whom to interact. If an individual requires a restriction or limitation in one or more of the areas listed below, due process of that restriction or limitation should be outlined in their person-centered plan. Policies and procedures related to restrictive interventions should be followed.

## DESCRIPTION OF SETTING

Ragtime Industries is in Albia, Iowa. The agency provides prevocational services primarily within the workshop setting. The building resembles a typical business and is in a section of town with other businesses nearby including a convenience store and a restaurant. The agency utilizes public buses and vans for transportation. Members, staff, visitors and others enter the building through the same entrance. The workshop building is very large with areas for members to have meals and breaks and personal lockers. The building houses the agency's administrative offices. The restrooms are in a common area and are shared by the members and the administrative staff. The remaining area is dedicated workspace for prevocational services. The room has two lines of tables. The tables each have a different task assigned to them and materials needed to complete the task. The agency has two main contracts for which members receiving prevocational services work to meet. The larger contract is with a local factory to assemble mousetraps and the other contract is with a local salon for laundry services.

## SETTING ASSESSMENT SUMMARY

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|---|---|
| <p>Did the organization attest to being compliant with HCBS settings requirements in the same or similar settings on their most recent Provider Quality Self-Assessment?</p>  | <p><input checked="" type="checkbox"/> Yes<br/> <input type="checkbox"/> No: EXPLAIN</p>                |
| <p>Does the organization operate other HCBS sites that have been determined through their most recent Quality Oversight Review to be compliant with HCBS settings requirements?</p>   | <p><input type="checkbox"/> Yes<br/> <input checked="" type="checkbox"/> No: See explanation below.</p> |
| <p>Ragtime Industries meets category 3 of heightened scrutiny due to the isolating effect the setting has on members receiving prevocational services. Due to the model of service and design of the program, the setting limits members' interaction with the broader community including interaction with individuals not receiving HCBS services and restricts member's choice to receive services and engage in activities outside of the setting.</p> <p>In 2017, a Focused Review related to compliance with HCBS settings in non-residential settings was completed to look at the agency's prevocational services. Prevocational services were found to be out of compliance due to the isolating effect the setting had on members because the service was not provided in a community integrated setting. The Corrective Action Plan (CAP) for the 2017, Focused Review was accepted in January 2018 because it outlined the agency's plans to contact local businesses and coordinate more integrated prevocational services opportunities. The agency was asked to provide evidence that they implemented the CAP and that they were able to overcome the effect of isolation. It was expected that members primarily receive prevocational services in community integrated settings. Ragtime Industries had reached out to the factory with which they contract for a large portion of their work to integrate the members doing the assembly work into the factory setting so that they would be working alongside the factory's general employees. The agency expressed commitment to finding integrated, community-based prevocational services opportunities. In March 2018, this was determined to be minimally compliant with HCBS settings requirements if the</p> |   |

agency “remained diligent” in their efforts to ensure all members primarily receive services in a community integrated setting. The provider was expected to carry out their CAP more fully over time. Continued compliance was to be monitored through annual self-assessment and ongoing periodic quality oversight review.

In August of 2022, a periodic quality oversight review was completed per the typical quality oversight schedule. It was discovered that the workshop setting failed to maintain compliance or to fully carry out their previously accepted CAP.

It was strongly recommended to the agency, at least in the short term, to focus compliance efforts in providing prevocational services outside of the workshop setting as opposed to trying to make the workshop setting integrated. The agency was also referred to other entities for technical assistance.

Another issue exists in that the prevocational services provided by Ragtime Industries may not meet the general requirements, definitions, and scope for prevocational services as outlined in definition in 441- 78.27(9). This issue will be addressed separately.

Ragtime Industries submitted an acceptable CAP in November 2022 in which they explained actions they had already taken to come into compliance including opening the worksop itself as a “Career Center” where they hold classes, skills-building workshops for HCBS members and the general public. Examples of topics covered in these classes included interview skills, completing applications, communication, money, typing and computer skills. These opportunities are free to all the public and widely advertised in the community. Grant funds have been secured to expand and continue this work including purchasing adaptive equipment and software to allow people of all abilities, members and the public alike, to learn and use Microsoft programs. Additionally, the agency is seeking partnerships with the local Retired Senior Volunteer Program (RSVP) to locate community volunteers to lead and teach the classes. The agency has already carried out and demonstrated compliance on this portion of the CAP.

Aditdonally, the CAP explained is further working to provide prevocational services in existing integrated community settings by more seeking classes already available in the community and matching members to the classes as desired and in alignment with the member's plans. Three members so far have attended digital literacy classes put on by the local school and public library. These classes were offered outside of the members’ normal prevocational service hours but the agency felt they fit well with the members’ prevocational service goals so they assisted them to attend and participate. The agency plans to continue seeking these opportunities and matching them to members they serve.

The agency has worked to strengthen their relationship with Vocational Rehabilitation so that members who are able and willing, can move more seamlessly from prevocational services to competitive community employment. Several members are receiving Vocational Rehabilitation services already.

The agency is applying as a supported employment provider which is intended to open up more opportunities for members to transition well from prevocational services to competitive, community employment.

Through the implementation of these corrective actions, they agency has been able to overcome the institutional presumption and effect of isolating people from the general community in the workshop setting.

## COMPLIANCE DECISION

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|--|--------------------------------|
| Name and title of person who completed this package of evidence summary:   | Theresa Hemann HCBS Specialist |
| <p><b>Compliance Status and Recommendations</b></p> <p><input checked="" type="checkbox"/> Evidence supports that the setting <b>is compliant</b> with HCBS settings requirements. Organization is required to maintain ongoing compliance with all HCBS requirements.</p> <p><input type="checkbox"/> Evidence supports that the setting <b>is NOT compliant</b> with HCBS settings requirements.</p> <p>    <input checked="" type="checkbox"/> Setting could/did meet requirements for HCBS Settings with remediation.</p> <p>        <input type="checkbox"/> Date remediation plan (CAP) accepted: 11/16/22</p> <p>        <input type="checkbox"/> Date remediation (CAP and compliance) achieved: 11/16/22</p> <p>    <input type="checkbox"/> Setting is unable or unwilling to meet requirements by compliance deadline.</p> <p><input type="checkbox"/> Other:</p> <p><b>Next Steps</b></p> <p><input checked="" type="checkbox"/> Post for public feedback (<i>HCBS Specialist to complete a package of evidence summary.</i>)</p> <p><input checked="" type="checkbox"/> Refer to CMS further heightened scrutiny review</p> |                                |