

Package of Evidence Summary

ORGANIZATION AND SETTING DETAILS

Organization Name: Developmental Ambassadors of Services and Health (DASH)
Phone: 402-614-3299

Setting Name: DASH Provider Owned and Controlled Homes	Date of site review: 8/5/22
Street address of setting: Organization-Wide multiple addresses	

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

ADDITIONAL DETAILS

List the number of HCBS funded members and non-HCBS funded members served in this setting.	HCBS funded: 14 Non-HCBS funded: 0
Is this setting provider owned or controlled?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is this setting an existing location or a new or prospective location?	<input type="checkbox"/> Prospective <input checked="" type="checkbox"/> Existing <input type="checkbox"/> New (<input type="checkbox"/> Check this box if the location is a newly constructed facility.)

<p>What category of heightened scrutiny applies to this setting?</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>What subcategories apply to this setting (select all that apply).</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 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

At the time of the review, DASH served twelve adults and two children for ID Waiver Supported Community Living (SCL) in single-family homes in the community. These consist of one to three person sites, with two children living together in one home. Homes are integrated in the community and located in residential neighborhoods surrounded by other single-family homes in Van Meter, Council Bluffs and Carter Lake Iowa.

SETTING ASSESSMENT SUMMARY

<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 <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 <input checked="" type="checkbox"/> No: See explanation below.</p>
<p>At the time of the review, DASH operated four provider owned and controlled homes. All homes are single-dwelling homes in residential communities located in multiple towns in Western Iowa. Homes are integrated in the community and located in residential neighborhoods surrounded by other similar homes and neighborhoods.</p> <p>DASH's provider owned and controlled homes meet category 3 of heightened scrutiny (the settings have the effect of isolating individuals receiving HCBS from the broader community) due to the program design and model of service provision, namely, policies and procedures, the settings limit individuals' opportunities for interaction in and with the broader community, including with individuals not receiving Medicaid-funded HCBS and restricts members' choices to receive services or to engage in activities outside of the setting.</p> <p>The agency previously attested to being in compliance with HCBS settings requirements on the annual self-assessment and was found to be compliant at initial application. However, the agency grew significantly between the initial application review and subsequent initial, probational certification and the first full Certification Review. The full, onsite Certification Review was conducted in April 2022 and it was discovered that the agency had implemented some policies and procedures limiting members' access to food, freedom from restraint, ability to have visitors of their choosing, and rights to privacy (cameras and alarms) without the need for such restrictions being tied to the individual, assessed needs of the members in the setting nor were they consistently and effectively outlined in members' person-centered plans. Lastly, evidence could not be provided at the time of the review to demonstrate that members accessed the community.</p> <p>In July 2022, the agency submitted an acceptable plan of correction to address the areas of non-compliance related to HCBS settings reporting that they have updated policies to indicate so that they no longer place standardized restrictions on members' ability to access the community or place</p>	

limitations on visitors and to assure members have access to food at any time. The corrective action plan indicated the agency would conduct an agency-wide audit of member’s person-centered plans, restraint needs, and rights restrictions and would retrain staff regarding restrictive interventions. The plan also indicated that they would ensure service documentation included evidence of member choice and access to the community.

As of July 2022, the agency had not demonstrated that the plan of correction was fully implemented. In October 2022, evidence of compliance was received and effectively demonstrated that their policies and procedures were successfully updated and staff were informed of the changes in procedures. Activity calendars were provided to demonstrate that members are accessing the community.

Developmental Ambassadors of Services and Health was determined to be in compliance with HCBS settings requirements in October 2022. Additional areas of corrective action are in remediation, but the agency was able to demonstrate a change in the design and model of service to overcome the effect of isolating individuals from the broader community and removed barriers to members’ choices to receive services or to engage in activities outside of the setting.

The agency is required to maintain ongoing compliance with HCBS settings requirements.

COMPLIANCE DECISION

Name and title of person who completed this package of evidence summary:	Paige Shelton HCBS Specialist
<p>Compliance Status and Recommendations</p> <p><input checked="" type="checkbox"/> Evidence supports that the setting is compliant 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 is NOT compliant with HCBS settings requirements.</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> Setting could/did meet requirements for HCBS Settings with remediation.</p> <p style="margin-left: 40px;"><input type="checkbox"/> Date remediation plan (CAP) accepted: 7/8/2022</p> <p style="margin-left: 40px;"><input type="checkbox"/> Date remediation (CAP and compliance) achieved: 10/14/2022</p> <p><input type="checkbox"/> Setting is unable or unwilling to meet requirements by compliance deadline.</p> <p><input type="checkbox"/> Other:</p> <p>Next Steps</p> <p><input checked="" type="checkbox"/> Post for public feedback</p> <p><input checked="" type="checkbox"/> Refer to CMS further heightened scrutiny review</p>	