

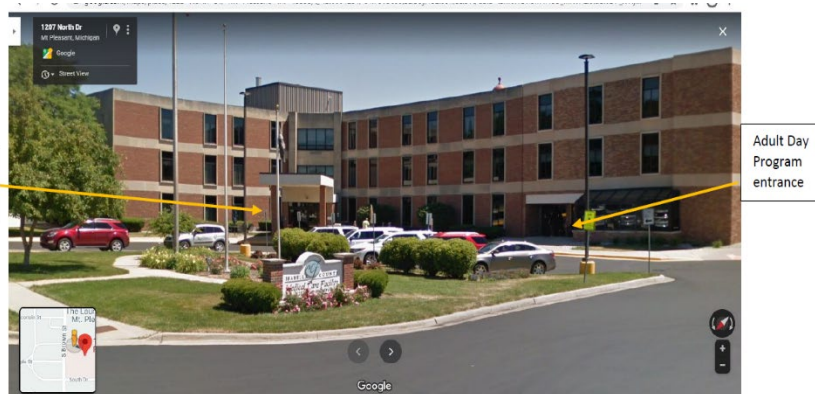
The State of Michigan
High Scrutiny Evidence packet

Provider's Name: Isabella County Adult Day Program	
Location of the Setting: Mt. Pleasant, Michigan	Type of Setting: Non-Residential
Waiver Services Being Provided at the setting: Adult Day Services	
Heightened Scrutiny Prong	
<input type="checkbox"/> Prong1: Setting is in a publicly or privately operated facility that provides inpatient institutional treatment <input checked="" type="checkbox"/> Prong2: Setting is in a building or on the same grounds of, or adjacent to, a public institution. <input type="checkbox"/> Prong3: setting has an effect of isolating individuals from the broader community	
Recommendation	
<p>As required by 42 CFR 441.301 (c) (5), the State of Michigan submits this request for heightened scrutiny review for the setting identified above. The State has compiled evidence that the setting is integrated and supports full access of individuals to the greater community, is selected by the individual from among disability and non-disability-specific settings, ensures individual rights, and promotes individual initiative, autonomy, choice, and independence.</p>	

Section 1: Facility Description

The Isabella County Adult Day Program (ADP) is located on the same campus and in the same building as the Isabella County Skilled Nursing Care Facility (SNF). They have separate entrances. Inside the building, the areas are separated by keypad entry doors accessible only to staff. The Isabella County, Adult Day program's goal is to provide social respite services for up to 25 individuals at a time. Adult Day Program participants don't usually intermingle with the Skilled Nursing Facility residents.

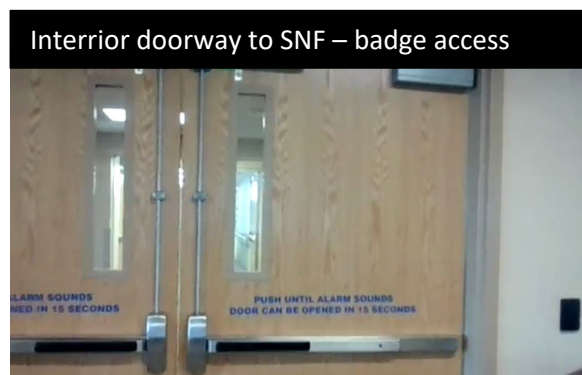
However, on a few occasions, such as when community entertainers come to the facility, the Skilled Nursing Facility residents who can participate come to the Adult Day Program community area accompanied by Skilled Nursing Facility staff.



The setting is located within two blocks of the retail, restaurant, and business district, which includes several professional office buildings and a grocery store.

Evidence:

- D1-Maps and pictures, D2- Campus Map
- D1-Maps and pictures
- E3-Adult Day Program Manager, E4-Adult Day Program Universal Worker job descriptions
- H1-Participant Rights, H4-Initial/Reassessment Service Plan, H6-Program Brochure,
- J1-Staff DN, J2-Staff CK/KH/CY interviews
- Direct observation of the setting within the community



D1 Maps and Pictures.pdf



D2 CAMPUS MAP-annotated.pdf

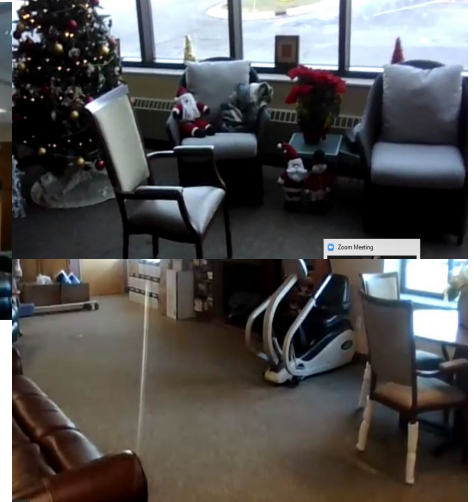
Section 2: Final Rule Compliance and Input from Individuals, Family Members, Guardians, and Staff

This setting accepts residents who except our Medicaid waiver and people who are not on Medicaid. Residents receiving Medicaid funded HCBS are provided the same opportunities to receive services and supports or participate in social and/or recreational activities in the same manner as individuals who are not receiving Medicaid funded HCBS.

This setting does not only accept residents of the same diagnosis or disability. Some residents at this facility have a diagnosis or disability, such as dementia, Alzheimer's, physical disability, mental disability, or traumatic brain injury, or they may not have a disability or diagnosis.

There are options for using services and supports outside the residence instead of only using the onsite services. Individuals have options within the setting and outside the setting to choose who provides their services and supports. Individuals are able to update or change the services and supports they receive based on their preferences and needs, and they are able to refuse services if they choose.

Participants may move about inside the Day Program facility freely. This setting does not restrict common areas. Common areas are not locked within the facility, and individuals have full access to all common areas. Access to the building and within the facility is barrier-free (wheelchair ramp) and accessible.



All areas of the facility, including the bathrooms, kitchenette, rest area, activity and game areas, and living room seating area, are physically accessible and have accommodations such as grab bars and raised toilet seats. The space includes comfortable seating, a television viewing area, a full kitchen, an exercise area, a resting area, a game, and dining tables.

This setting does not have visiting hours. Participants and visitors can come and go as they choose. Participants at this setting are able to come into the setting at all hours. Residents are free to move about the outside campus 24/7; staff will assist those for whom this will be unsafe.

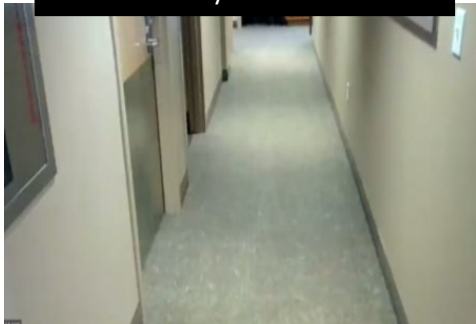
Evidence:

- D1-Maps and pictures
- J1-Staff DN, J2-Staff CK/KH/CY interviews
- Direct observation of facility and participants accessing all areas of the ADPs facility, including sitting area, kitchenette, resting area, game, arts, craft tables

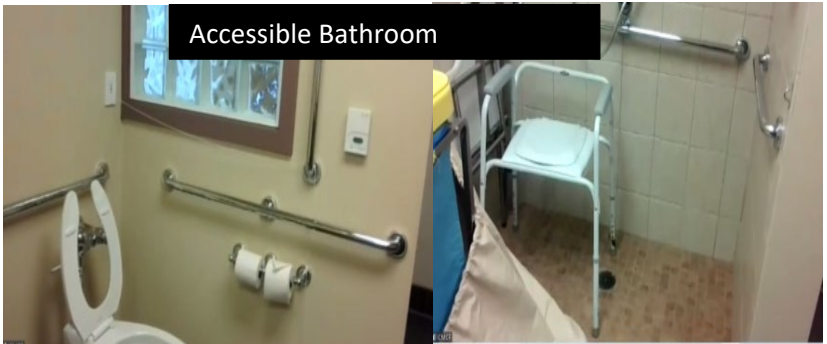


There is a keypad access door leading to the Skilled Nursing Facility. The hallways are wide, and seating areas afford enough space between furnishings to accommodate wheelchairs or other assistive mobility devices.

Wide Hall way



Accessible Bathroom



Evidence:

- D1-Maps and pictures
- J1-Staff DN, J2-Staff CK/KH/CY interviews

This setting does not have restrictions on food. The setting does have scheduled meal times, but participants do not have to eat during those times. All adult day program participants may be joined by friends and family members at any mealtime. There are scheduled mealtimes and snack times, but snacks and beverages are always available upon request. Vending machines are also available. Participants are able to eat meals and snacks they want, what they choose to eat, eat with whom they want, and are able to eat wherever they want.

Evidence:

- D1-Maps and pictures
- H1-Participant Rights, H5-Participation Agreement, H6-ADP Brochure, H7-Program Overview
- J1-Staff DN, J2-Staff CK/KH/CY interviews



D1 Maps and Pictures.pdf



E3 ADULT DAY PROGRAM MGR-JOEPROGRAM UNIVERS



E4 ADULT DAY PROGRAM UNIVER



H1 Participant Rights-annotated.p



H4 Initial and Reassessment Servic



H5 PARTICIPATION AGREEMENT Isabell



H6 ADP-Brochure_0827'Overview-annotat



H7 Program Overview-annotat



J1 STAFF DN.pdf



J2 STAFF CK-KH-CY.pdf



Individuals arrange and control their personal schedules of daily appointments and activities. All participants in the Adult Day Program may attend personal appointments.

Information about filing an anonymous complaint at this setting is in an understandable format and posted in an obvious location. Individuals are also provided with the information on how to discuss any concerns with staff if they choose to discuss concerns with staff.

Evidence:

- E4-Adult Day Program Universal Worker job description
- H1-Participant Rights,
- J1-Staff DN interview

All adult day program participants may participate in all program activities. The Activity Calendar offers the same activities to all participants.

This setting does not prohibit individuals from coming and going from the setting. The setting does not try to limit activities the individuals participate in, such as shopping, religious or spiritual services, scheduling appointments, participating in meals with friends and family, participating in any activities, participating in community events, participating in school or volunteer activities, engaging in legal activity (voting, drinking, gambling, etc.) or any other activity the participant chooses to participate in. Individual shopping is often done on a day they are not at the facility. The facility plans excursions for shopping and other entertainment in which all may participate. These outings include Christmas shopping trips and outings to the local farmer's marketplace. Participants who want to do something independently outside the setting will have family arrange transportation, or the staff can assist. The facility offers field trips and self-directed activities from which the program participants may choose.

This setting will provide assistance to residents who need help with dressing, showering, or other hygiene matters. Participants are able to wear whatever clothing they want and can get assistance with dressing. The setting does ensure privacy for the individual when providing assistance.

This setting does not limit communication devices. Individuals can have and use landlines, cell phones, personal computers, and TV's 24/7 without restriction.

This setting protects the privacy of individuals' health and personal information by keeping this information locked up. The staff does not discuss individual residents' issues in public spaces.

When addressing individuals, this setting addresses the individual in the manner they prefer.

This setting does not control residents' funds. Resident's access and control their own funds.

Residents at this setting have a safe and locked space to store their belongings.

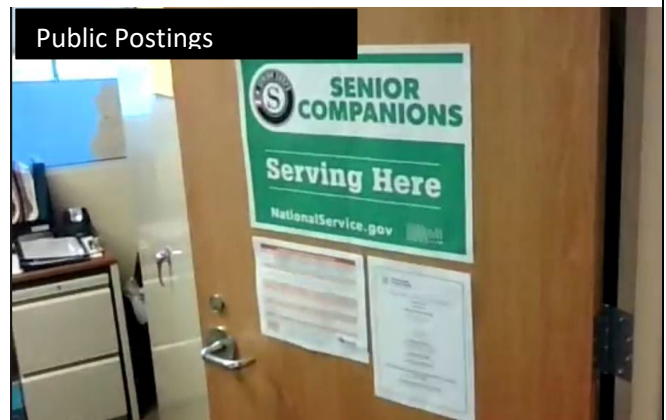
Evidence:

- E3-Adult Day Program Manager, E4-Adult Day Program Universal Worker job descriptions
- H1-Participant Rights, H2-Initial Assessment, H5-Participation Agreement, H6-Program Brochure, H7-Program Overview, H10-Activity Calendar
- J1-Staff DN, J2-Staff CK/KH/CY interviews

Evidence:

- E3-Adult Day Program Manager job description
- G2- Person-Centered Care Design, G3-Person Centered Planning
- H1-Participant Rights, H2-Initial Assessment, H4-Initial/Reassessment Service Plan, H7-Program Overview, H10-Activity Calendar
- J1-Staff DN, J2-Staff CK/KH/CY interviews
- Direct observation of participants asking one another to join them in the board game.

The setting advertises and invites guests via the facility website and social media pages, posters, and flyers placed in the facility and in the broader community.
















Evidence:

- H8-Flyers-Public Notification of Events, H10-Activity Calendar
- J1-Staff DN, J2-Staff CK/KH/CY interviews

Participants have access to transportation. The use of public transportation is not common among Adult Day Program participants during the program day. Most of them rely on rides from family and friends. If assistance with a bus route is needed, staff would be available to do so. The Greater Clare and Isabella Counties transit pick up and drop off participants to their homes. Family members or friends usually arrange transportation to private appointments, but the facility also has wheelchair-accessible vans that can transport participants to and from appointments or group outings. Upon request, staff will transport participants to private appointments via the facility van. Staff will assist with arranging private or public transportation if a responsible family member or guardian is aware. This is to ensure the safety of the participants.

Evidence:

- H5-Participation Agreement, H7-Program Overview
- J1-Staff DN, J2-Staff CK/KH/CY interviews

					
E3 ADULT DAY PROGRAM MGR-JOE	E4 ADULT DAY PROGRAM UNIVERS	G2 POLICY-PERSON CENTERED CARE DE	G3 POLICY-PERSON CENTERED PLANNIN	H1 Participant Rights-annotated.p	H2 Initial Assessment-annotat
					
H5 PARTICIPATION AGREEMENT Isabell: ADP-Brochure_0827	H6	H7 Program Overview-annotat	H8 Flyers_Public Notification of Even	H10 ACTIVITY CALENDAR-2019-Isal	J1 STAFF DN.pdf
					
J2 STAFF CK-KH-CY.pdf					

Individual rights and responsibilities are provided in the new participant's written materials and are discussed during program enrollment. The information about rights and responsibilities is also posted in public areas

within the Day Program Setting. Individuals may submit complaints and grievances for investigation. The setting conducts an annual satisfaction survey of participants and caregivers.

Evidence:

- D1-Maps and pictures
- E3-Adult Day Program Manager job description
- G4-Grievance Policy, G5-Grievance/Concern Form
- H1-Participant Rights, H3-Notice of Privacy Practices Acknowledgement, H5-Participation Agreement, H6-ADP Brochure, H7-Program Overview,
- J1-Staff DN, J2-Staff CK/KH/CY interviews

This setting, as well as the MI Choice waiver program, prohibits the use of physical restraints and/or restrictive interventions.

The setting must comply with all aspects of the CMS Final Rule. The person-centered service plan must be developed through an individualized planning process and is driven by the individual. Any modification to the rule must be done on a case-by-case basis and should never apply to all. Any modification must be documented in the person-centered service plan. The HCBS Final Rule states the modification should:

1. Identify a specific and individualized assessed need.
2. Document the positive interventions and supports used prior to any modifications to the person-centered service plan.
3. Document the positive interventions and supports used prior to any modifications to the person-centered service plan.
4. Include a clear description of the condition that is directly proportionate to the specific assessed need.
5. Include regular collection and review of data to measure the ongoing effectiveness of the modification.
6. Include established time limits for periodic reviews to determine if the modification is still necessary or can be terminated.
7. Include the informed consent of the individual or guardian
8. Include an assurance that interventions and supports will cause no harm to the individual.

All modifications would need to be reviewed frequently and the service plan updated to ensure the participant still needs the modifications.

Evidence:

- F1-F6 – Staff Training Logs, F7-Staff Orientation Sample Documentation
- H1- Participant Right
- J1-Staff DN, J2-Staff CK/KH/CY interviews



D1 Maps and
Pictures.pdf



E3 ADULT DAY
PROGRAM MGR-JOE



F1



F2 TRAINING-CK -
annotated.pdf



F3
TRAINING-KS-annot.



F4
TRAINING-CY-annot.



F5
TRAINING-JQ-annot



F6
TRAINING-AV-annot



F7-Staff
Orientation Sample



G4 Grievance
Policy-Isabella Coun



G5 Grievance or
Concern Form- Isab



H1 Participant
Rights-annotated.p



H3 Notice of
Privacy-annotated.p



H6
ADP-Brochure_0827



H7 Program
Overview-annotat



J1 STAFF DN.pdf

Section 3: Additional Evidence

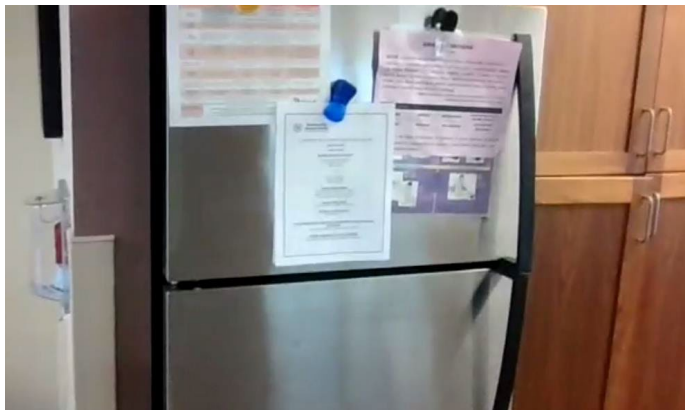
Door to exterior



Interior Doorway to SNF – badge swipe to enter



Public Posing



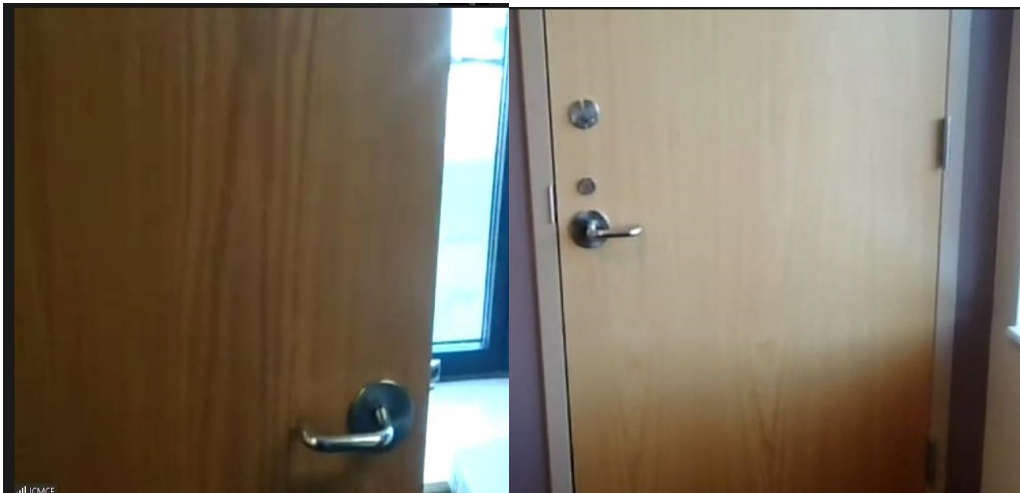
Big space – living and dining



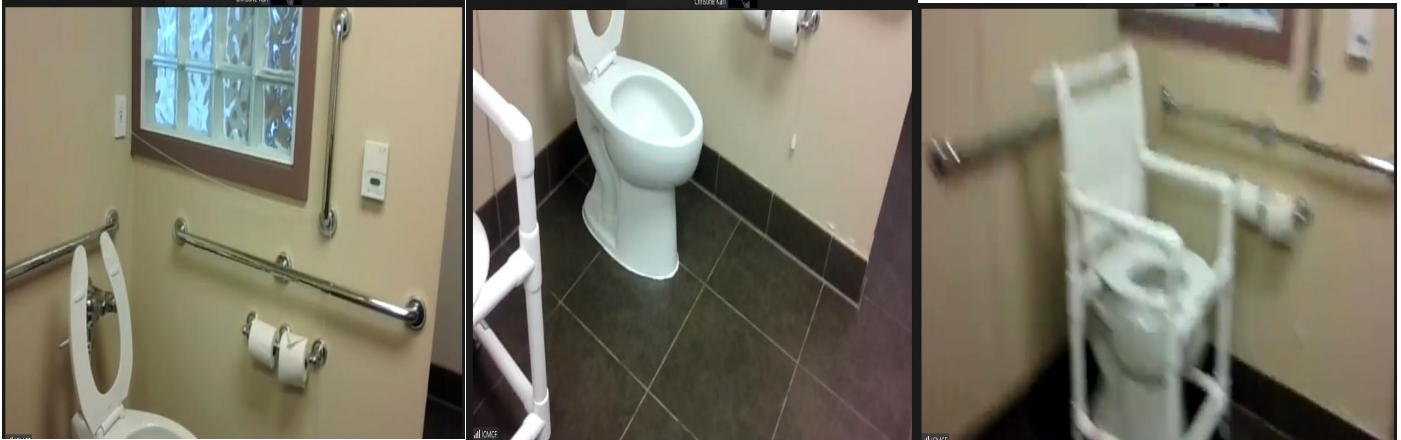
Comfortable sitting area



Public restroom interior and exterior locks



Public restroom



Shower area

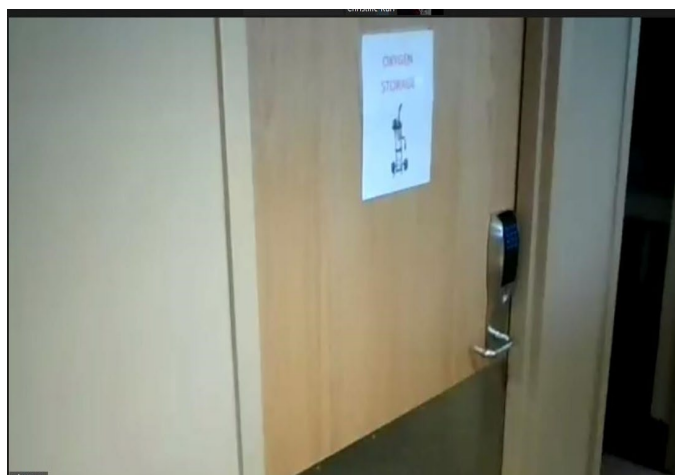


Storage for personal care items (soaps, shampoos, etc.)

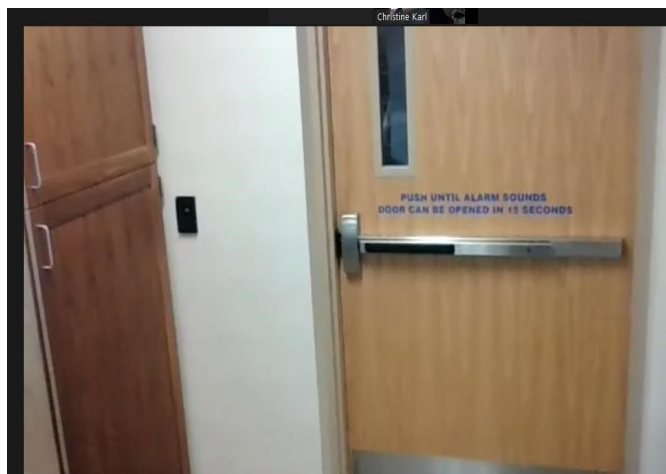


Locked utility closet
alarmed

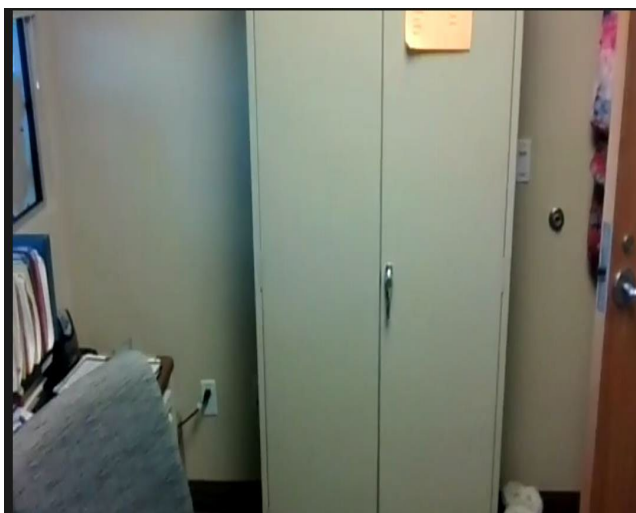
Doorway to the stairwell – employee only, not locked but



Staff conference room (care planning done here)



Cabinet holding charts – lockable



Section 4: Public Comment