



State of California—Health and Human Services Agency
Department of Health Care Services



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**CALIFORNIA DEPARTMENT OF HEALTH CARE SERVICES
 HEIGHTENED SCRUTINY EVALUATION SETTING SUMMARY SHEET**

Home and Community-Based Services

SITE OVERVIEW

Heightened Scrutiny Identification Number	120
Provider Name	Elim
Setting Name	Elim
Setting Type	
Waiver(s) Served	
Setting Address	
Site Assessment Completion Date	09/10/2019
Heightened Scrutiny Summary Sheet Completion Date	05/25/2022
Expected Date of Compliance	06/15/2022

REASON(S) FOR HEIGHTENED SCRUTINY (HS)

- Setting is located in a building that is also a publicly or privately-operated facility that provides inpatient institutional treatment
- Setting is in a building located on the grounds of, or immediately adjacent to, a public institution

- Setting has the effect of isolating individuals receiving Medicaid Home and Community Base Services (HCBS) from the broader community of individuals not receiving Medicaid HCBS
 - Due to the design or model of service provision in the setting, individuals have limited, if any, opportunities for interaction in and with the broader community, including individuals not receiving Medicaid-funded HCBS
 - Setting restricts individual choice to receive services or to engage in activities outside of the setting
 - Setting is located separate and apart from the broader community without facilitating individual opportunity to access the broader community and participate in community services, consistent with an individual's person-centered plan



SETTING SUMMARY: COMPLIANCE OVERVIEW AND REMEDIATION STRATEGY

Setting is located in a building that is also a publicly or privately-operated facility that provides inpatient institutional treatment

Summary of Evidence	
Summary of Remediation Strategy	

Remediation Strategy Approved? Yes No

Remediation Start Date: _____

Remediation End Date: _____



Setting is in a building located on the grounds of, or immediately adjacent to, a public institution

Summary of Evidence	
Summary of Remediation Strategy	

Remediation Strategy Approved? Yes No

Remediation Start Date: _____

Remediation End Date: _____



Due to the design or model of service provision in the setting, individuals have limited, if any, opportunities for interaction in and with the broader community, including individuals not receiving Medicaid-funded HCBS

<p>Summary of Evidence</p>	<p>Elim does not support individuals to have opportunities for interaction in and with the broader community. Elim relies on families and friends to provide transportation so individuals can be in the community. Elim does not plan community activities as part of its plan for service and individuals are not supported to participate in integrated community activities such as senior centers or adult day programs. Individuals are not supported to leave their home without supervision. Elim has other practices that impede an individual’s ability to participate in community activities. Doors are alarmed and locked, individuals do not have keys. Gates are locked and individuals do not have keys. There are cameras used for monitoring.</p>
<p>Summary of Remediation Strategy</p>	<p>Elim intends to support individuals being integrated into the community. Elim will provide information to individuals about public, paratransit, and rideshare and other third-party transportation. Staff will assist individuals in scheduling and arranging transportation for community activities. The staff will share information about community resources, including senior centers and adult day programs.</p> <p>Elim will create a calendar of community outings and activities based on individuals’ preferences and needs. Individuals and staff will meet to discuss activities and to arrange for individuals to participate. The staff will document what they learn about an individual’s preferences and interests in their Individual Service Plan (ISP). Staff and individuals will explore commonalities among housemates/roommates to find activities based on shared interests. Individuals will be supported to go out independently with their housemates/roommates. Staff will follow the ISP to provide support to individuals in accessing the community providing supports as described in the ISP. If the person- centered team identifies that an individual should be restricted from accessing the community, the restriction will be based on an assessed need, documented in the person-centered plan, and reviewed at least annually.</p> <p>Elim developed a process to ensure that rights and restrictions were imposed only when there was an individual assessed need. The person-centered team is responsible for assessing, documenting, and reviewing all restrictions to ensure that any restriction is based on an assessed need, documented in the ISP, and reviewed at least annually. The person-centered team determines the extent of any barriers or restrictions to community access for any individual. Elim developed a policy that explained that there are chimes, not alarms on the exterior doors. The policy is reviewed at admission and documented in the ISP. Individuals are</p>



	<p>offered a key to the locked exterior doors. If there is an assessed need that would limit the individual's right to have a key, based on the person-centered team's assessment, the need and restriction is documented in the ISP and reviewed at least annually. If an individual has difficulty using a key, the staff will be available to help the individual with the key. The padlocks on the gates have been removed.</p> <p>Elim met with individuals about the use of the cameras. Individuals wanted to continue to use the cameras outside for safety and security. Elim will develop a policy that explains the purpose of the video cameras explaining that the administrator is the only person who views the video, video is reviewed when there is an incident, and recordings auto-delete after thirty days. The policy will be reviewed at admission and annually.</p>
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Remediation Strategy Approved? Yes No

Remediation Start Date: 04/25/2022

Remediation End Date: 06/15/2022



Setting restricts individual choice to receive services or to engage in activities outside of the setting

Summary of Evidence	Individuals are not supported to leave their home without supervision. Elim has other practices that impede an individual’s ability to participate in community activities. Doors are alarmed and locked, individuals do not have keys. Gates are locked and individuals do not have keys. There are cameras used for monitoring.
Summary of Remediation Strategy	<p>Elim developed a process to ensure that rights and restrictions were imposed only when there was an individual assessed need. The person-centered team is responsible for assessing, documenting, and reviewing all restrictions to ensure that any restriction is based on an assessed need, documented in the ISP, and reviewed at least annually. The person-centered team determines the extent of any barriers or restrictions to community access for any individual. Elim developed a policy that explained that there are chimes, not alarms on the exterior doors. The policy is reviewed at admission and documented in the ISP. Individuals are offered a key to the locked exterior doors. If there is an assessed need that would limit the individual’s right to have a key, based on the person-centered team’s assessment, the need and restriction is documented in the ISP and reviewed at least annually. If an individual has difficulty using a key, the staff will be available to help the individual with the key. The padlocks on the gates have been removed.</p> <p>Elim met with individuals about the use of the cameras. Individuals wanted to continue to use the cameras outside for safety and security. Elim will develop a policy that explains the purpose of the video cameras explaining that the administrator is the only person who views the video, video is reviewed when there is an incident, and recordings auto-delete after thirty days. The policy will be reviewed at admission and annually.</p>

Remediation Strategy Approved? Yes No

Remediation Start Date: 04/25/2022



Remediation End Date: 06/15/2022



Setting is located separate and apart from the broader community without facilitating individual opportunity to access the broader community and participate in community services, consistent with an individual's person-centered plan

Summary of Evidence	
Summary of Remediation Strategy	

Remediation Strategy Approved? Yes No

Remediation Start Date: _____

Remediation End Date: _____