



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

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| Heightened Scrutiny Identification Number | 239 |
| Provider Name | Legacy Oaks |
| Setting Name | Legacy Oaks |
| Setting Type | |
| Waiver(s) Served | |
| Setting Address | |
| Site Assessment Completion Date | 09/04/2019 |
| Heightened Scrutiny Summary Sheet Completion Date | 06/02/2022 |
| Expected Date of Compliance | 10/15/2022 |

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-Based 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

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| 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



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| 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

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| Summary of Evidence | Legacy Oaks provides assisted living services and memory care services at this address. The Memory Care unit is secured with delayed egress doors, a fenced and locked outside area, and keypad coded doors. Individuals in the Memory Care unit do not the opportunity for interaction in and with the broader community except with staff assistance. Individuals living at Legacy Oaks rely on their family for transportation for medical appointments and recreation in the broader community. Individuals do not have the opportunity to participate in community activities with or separate from their housemates/roommates. Individuals cannot enter their home without assistance from staff when the exterior doors are locked at night. |
| Summary of Remediation Strategy | In response, Legacy Oaks submitted a plan that describes how they intend to support individuals to have greater opportunity for community integration. Staff at Legacy Oaks will support individuals with transportation as needed. They will provide information about transportation options, including public transportation, rideshare, or taxi services. They will display information about schedules, phone numbers, and fees. Individuals receiving assisted living services or memory care services are free to come and go unless there is an assessed need documented in their Individual Service Plan (ISP). All restrictions will be reviewed no less than annually. Legacy Oaks intends to schedule community activities based on input they gather from individuals and the individuals' ISP. The staff will document individual wants, likes, interests, and goals in the ISP. The Round 2 RWP stated the provider will schedule monthly activities and outings based on individuals' input each month. The provider will document individuals' wants, likes, interests, and goals in their ISP and utilize that information to plan activities and outings. If an individual has an assessed need which requires assistance in the community, staff will be available to assist the individual. Individuals can go out with or without their housemates/roommates. Staff will go with individuals or groups, they will help arrange transportation, or they will provide transportation to ensure that individuals can engage in the broader community. |



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| | <p>Individuals receiving memory care services live in a space that is secured with delayed egress, a fenced and locked outside area, and keypad coded doors. Legacy Oaks, as a secure setting, ensures that no one is living in the secure setting that does not have an assessed need that warrants delayed egress, a fenced and locked outside area, and keypad coded doors. Restrictions are documented in the ISP. These restrictions are reviewed prior to admission and at least annually after that.</p> <p>All individuals living at Legacy Oaks will be given a key to their home unless there is an assessed need documented in the ISP. Legacy Oaks will ensure that all restrictions are based on an assessed need, documented in the ISP, and reviewed at least annually.</p> |
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Remediation Strategy Approved? Yes No

Remediation Start Date: 03/17/2022

Remediation End Date: 10/15/2022



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

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| Summary of Evidence | Legacy Oaks with delayed egress doors, a fenced and locked outside area, and keypad coded doors. Individuals cannot enter their home without assistance from staff when the exterior doors are locked at night. |
| Summary of Remediation Strategy | <p>Individuals, a fenced and locked outside area, and keypad coded doors. Legacy Oaks, as a secure setting, ensures that no one is living in the secure setting that does not have an assessed need that warrants delayed egress, a fenced and locked outside area, and keypad coded doors. Restrictions are documented in the ISP. These restrictions are reviewed prior to admission and at least annually after that.</p> <p>All individuals living at Legacy Oaks will be given a key to their home unless there is an assessed need documented in the ISP. Legacy Oaks will ensure that all restrictions are based on an assessed need, documented in the ISP, and reviewed at least annually.</p> |

Remediation Strategy Approved? Yes No

Remediation Start Date: 03/17/2022

Remediation End Date: 10/15/2022

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



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| Summary of Evidence | |
| Summary of Remediation Strategy | |

Remediation Strategy Approved? Yes No

Remediation Start Date: _____

Remediation End Date: _____