

Ark Regional Services

Home and Community Based Setting Transition Plan

September 1, 2015

Summary of Purpose

Ark Regional Services must comply with the new Centers for Medicare and Medicaid Services (CMS) final rule on Home and Community Based settings, which requires our organization to make changes to our policies, procedures, and delivery system.

Communication and Training Plan

Upon approval of this transition plan, Ark Regional Services will distribute the transition plan to guardians and family members via the United States Postal Services, and via secure communication on Therap. The plan will be posted on our organization website (www.arkregionalservices.org). The majority of the changes addressed in this plan are already in place; therefore, evaluation of effectiveness has already occurred. The plan will be evaluated every 6 months to ensure progress and make needed changes. All policy changes will be addressed with each employee and individual served on an annual basis.

Transition Plan (September 2015 – October 2018)

- 1) While Ark Regional Services expressly forbids the practice of seclusion, this must be specifically written into organizational policies and procedures.**
 - a) Ark Regional Services will update its Restraint Policy and Restraint Procedure to include seclusion as a prohibited practice. Training is already occurring in initial and annual Mandt training.
 - i) *Target Date of Completion: December 1, 2015*
 - ii) *Target Date of Submission: January 15, 2016*
 - b) Ark Regional Services will update the Client Handbook to include the policy on seclusion as a prohibited practice.
 - i) *Target Date of Completion: March 1, 2016*
 - ii) *Target Date of Submission: April 1, 2016*
- 2) Ark Regional Services must ensure that all settings integrate non-disabled persons who are not paid staff.**
 - a) All language arts and literacy classes will be held at the Parkside building located at 712 Canby
 - i) *Target Date of Completion: September 30, 2015*
 - b) All students participating in the OASI inspired program designed for folks with severe and profound disabilities will participate in integrated classes throughout the day, but utilize the classroom located in the Ark Administration building as a “home base” should additional support and structure be needed.
 - i) *Target Date of Completion: September 30, 2015*
 - ii) *Evaluation Date: October 31, 2015*
 - c) Need for classroom at administration building to be locked will be evaluated
 - i) *Target Date of Completion: Every six months beginning March 31, 2016*
 - (1) This classroom will need to remain locked (unless evaluation of situation proves otherwise) for as long as we provide ADS to a particular client. If we discontinue

providing these services to this individual, the locking of the classroom with desist immediately.

- d) A portion of the language arts and literacy classes offered at the Parkside building will be available for any member of the general public, in addition to people with disabilities
 - i) *Target Date of Completion: September 30, 2016*
 - ii) *Evaluation Date: October 31, 2016*
 - e) All language arts and literacy classes offered at the Parkside building will be available for any member of the general public, in addition to people with disabilities
 - i) *Target Date of Completion: September 30, 2017*
 - ii) *Evaluation Date: October 31, 2017*
 - f) Ark Regional Services will actively and consistently market and advertise language arts and literacy classes throughout Albany County
 - i) *Target Date of Completion: September 30, 2018*
 - ii) *Evaluation Date: October 31, 2018*
 - g)
- 3) Ark Regional Services must ensure people have the opportunity to receive services in the community (i.e., Section 8, public housing, SSI) to the same degree as persons not receiving Medicaid HCBS.**
- a) Ark Regional Services currently ensures people have access to these types of services, and appropriate staff members are trained on rules, regulations, and how to assist in completing necessary paperwork. The Client Handbook will be updated to address how Ark will assist people in accessing these services.
 - i) *Target Date of Completion: March 1, 2016*
 - ii) *Target Date of Submission: April 1, 2016*
- 4) Ark Regional Services must demonstrate that settings are selected by the person from options including non-disability specific settings.**
- a) Ark Regional Services currently offers the most integrated setting, based on the activities in which a person wants to participate (i.e., if someone wants to participate in a sign language class, UW, LCCC, and Ark classes are offered). Ark will update the Client Handbook to address the process used to ensure that people choose the setting of the services that are provided.
 - i) *Target Date of Completion: March 1, 2016*
 - ii) *Target Date of Submission: April 1, 2016*
- 5) While Ark Regional Services expressly forbids the practice of seclusion, this must be specifically address freedom from coercion and seclusion in organizational policies and procedures.**
- a) Ark Regional Services will update its Restraint Policy and Restraint Procedure to include seclusion as a prohibited practice. Training is already occurring in initial and annual Mandt training.
 - i) *Target Date of Completion: December 1, 2015*
 - ii) *Target Date of Submission: January 15, 2016*
 - b) Ark Regional Services will update the Client Handbook to include the policy on seclusion as a prohibited practice.
 - i) *Target Date of Completion: March 1, 2016*
 - ii) *Target Date of Submission: April 1, 2016*
- 6) Ark Regional Services must ensure each person has privacy in their sleeping or living unit.**
- a) Ark Regional Services will update the Client Handbook to include the individualized process for monitoring systems utilized for seizure supervision. Staff training is already conducted during individual needs training (INT).
 - i) *Target Date of Completion: March 1, 2016*

- ii) Target Date of Submission: April 1, 2016*
- 7) Ark Regional Services must ensure that each person has a lockable room, and all homes owned or operated by Ark have lockable entrances.**
 - a) This practice already occurs at Ark Regional Services. We will update the Client Handbook to include a policy that covers lockable entrances, bedrooms, and access to same.
 - i) Target Date of Completion: March 1, 2016*
 - ii) Target Date of Submission: April 1, 2016*
- 8) Ark policy must address how housemates are chosen for each residential setting.**
 - a) Ark Regional Services will update the Client Handbook to include a process that addresses how housemates are chosen in residential settings. Training will occur in New Employee Orientation and Ark Annual Training.
 - i) Target Date of Completion: March 1, 2016*
 - ii) Target Date of Submission: April 1, 2016*
- 9) Although people have absolute choice in the schedule they follow, Ark Regional Services must formally document this process, as well as the right people have to deviate from this schedule.**
 - a) Ark Regional Services will update the Client Handbook to include a process that addresses each person's choice in how s/he spends the day. Training already occurs during INT.
 - i) Target Date of Completion: March 1, 2016*
 - ii) Target Date of Submission: April 1, 2016*
- 10) Ark Regional Services must ensure that each person has the freedom and right to access food at any time.**
 - a) Ark Regional Services will update the Client Handbook to include a policy on a person's right to access food at any time. Policy will include how we will adhere to restrictive diets and not allow for any punitive action should a person choose not to follow the diet. Training will be included in INT.
 - i) Target Date of Completion: March 1, 2016*
 - ii) Target Date of Submission: April 1, 2016*
- 11) Ark Regional Services must identify how time and choice of meals are determined.**
 - a) Ark Regional Services will update the Client Handbook to indicate the process by which people choose when and what they eat. Training will be included in INT.
 - i) Target Date of Completion: March 1, 2016*
 - ii) Target Date of Submission: April 1, 2016*
- 12) Ark Regional Services must identify how people choose their mealtime companions.**
 - a) Ark Regional Services will update the Client Handbook to indicate that people can choose with whom they eat. Training will be included in INT.
 - i) Target Date of Completion: March 1, 2016*
 - ii) Target Date of Submission: April 1, 2016*

Preliminary Transition Plan Review Report

Provider: ARK Regional Services	Date: 10/29/15
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Summary of Purpose: Ark Regional Services must comply with the new Centers for Medicare and Medicaid Services (CMS) final rule on Home and Community Based settings, which requires our organization to make changes to our policies, procedures, and delivery system.

Communication plan: Upon approval of this transition plan, Ark Regional Services will distribute the transition plan to guardians and family members via the United States Postal Services, and via secure communication on Therap. The plan will be posted on our organization website (www.arkregionalservices.org). The majority of the changes addressed in this plan are already in place; therefore, evaluation of effectiveness has already occurred. The plan will be evaluated every 6 months to ensure progress and make needed changes. All policy changes will be addressed with each employee and individual served on an annual basis.

ITEM	FINDING	RESULTS
<i>Item# 1- The setting does not provide people with disabilities multiple types of services and activities on-site.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
<i>Item# 2- Participants in this setting interact with members of the community whenever they please.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
<i>Item# 3- Participants have safe physical access to the community.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
<i>Item# 4-Participants have transportation options that result in the ability to access the community when they please.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
<i>Item# 5-The setting does not use or authorize interventions or restrictions that are used in institutional settings. (e.g. seclusion, involuntary restraints).</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
<i>Item# 6- The setting integrates non-disabled persons who are not paid staff.</i>	2a. Complete 2b. Complete 2c. Pending 2d. Pending 2e. Pending 2f. Pending	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
<i>Item# 7- The setting supports full access to the greater community.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
<i>Item# 8- The setting supports and encourages interactions with people in the greater community when participants have visitors or visit community locations, stores, etc.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
<i>Item# 9- The setting includes opportunities to seek employment.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
<i>Item# 10- Employment opportunities include competitive integrated work places.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
<i>Item# 11-The setting includes opportunities for persons to engage in community life.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.

Item# 12- <i>The setting includes opportunities for persons to control personal resources.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 13- <i>The setting includes opportunities to receive services in the community to the same degree as persons not receiving Medicaid HCBS.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 14- <i>The setting is selected by the person from options including non-disability specific settings.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 15- <i>The setting ensures a person's rights of privacy.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 16- <i>The setting ensures a person's rights of dignity and respect.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 17- <i>The setting ensures a person's rights of freedom from coercion and restraint.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 18- <i>The setting optimizes a person's independence in choosing daily activities.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 19- <i>The setting optimizes a person's independence in choosing his or her physical environment.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 20- <i>The setting optimizes a person's independence in customizing his or her physical environment.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 21- <i>The setting optimizes a person's ability to choose with whom to interact.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 22- <i>The setting facilitates personal choice regarding services and supports.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 23- <i>The setting facilitates personal choice regarding which provider provides services.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 24- <i>Each person in the residential setting has a signed lease or written residency agreement.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 25- <i>Each person has privacy in their sleeping or living unit.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 26- <i>Each unit has lockable entrance doors (bedroom and house door) with access to the lock, along with appropriate staff having access.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 27- <i>Each person sharing a sleeping or living unit has a choice of roommates.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 28- <i>Each person has the freedom to furnish and decorate within the</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.

<i>lease/agreement.</i>		
Item# 29- <i>The persons do not have to follow a regimented schedule during services in this setting.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 30- <i>Each person has the freedom and right to support and control his/her own schedule and activities.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 31- <i>Each person has the freedom and right to support to access food at any time.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 32- <i>Each person can decide when they want to eat.</i>	<i>Pending</i>	The provider's plan and milestones were reviewed and it was determined to meet the requirement and has appropriate timelines.
Item# 33- <i>Each person can decide with whom to eat with.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 34- <i>Each person may have visitors at any time.</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.
Item# 35- <i>The setting is physically accessible to each person in it</i>	<i>Complete</i>	Provider submitted documentation of compliance with the completed setting survey.

Report Prepared by: **Dani Sullivan**

Please note: This document is a preliminary report to provide feedback on the HCB Transition plan your organization submitted. You will receive a final report which may contain additional feedback or categories not found in this preliminary report.