

**Home and Community-Based Services (HCBS) Rules
CONCEPT PROPOSAL**

Enclosure C

Existing regional center vendors may receive funding to make changes to service settings and/or programs to help them come into compliance with the HCBS rules. To be considered for funding, vendors must complete and submit this form and the Provider Compliance Evaluation form by October 1, 2016, to the regional center with which it has primary vendorization.

This form may not exceed three pages and must be kept in Arial 12-point font. The narrative should link to the federal requirement that is not being met. The Provider Compliance Evaluation should guide the narrative. The results of the Evaluation should be clearly laid out in the narrative. Additionally, the narrative should describe how the funding would achieve compliance. Concept proposals should be developed with a person-centered approach, with proposed changes/activities focused on the needs and preferences of those who receive services. The estimated budget and timeline need not be detailed at this point but must include all major costs and benchmarks.

More information on the HCBS rules and this form can be found at:
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Vendor and vendor number	PRIDE Industries HN0199
Primary regional center	North Bay Regional Center
Service type and code	Work Activity Program - 954
Number of consumers currently serving	76
Barriers to compliance with the HCBS rules and/or project implementation	This facility meets all Federal Requirements with the exception of requirement #1. Individuals at this facility who receive Medicaid HCB Services currently work in a congregate work setting which limits their access to the greater community. The individuals working in this setting are provided with options for community integration and utilization of community resources but the nature of the setting limits their access to these options both by consumer choice and by work setting requirements.
Narrative/description of the project. Identify which HCBS federal requirements are currently out of compliance; include justification for funding request	Review of Provider Compliance Evaluation: The results of this evaluation show that the facility clearly meets the Federal Requirements 2,3,4,5, and 10. Requirements 6-9 are not applicable to this facility as no Residential Services are provided. The guidance guidelines under Federal Requirement 1 are not being met at this facility specifically related to the individual's access to community integration and utilization of community services. As noted in the PCE, the components of the facilities setting that impede compliance with this requirement are: <ul style="list-style-type: none"> The work setting is in a congregate work environment with multiple individuals with disabilities working together under the supervision of both disabled and non-disabled staff.

- The primary component of this work setting is production related with the average paid work at the facility at 66% of their Program day.
- Individuals in this setting have limited access to the community during their program day. Although the facility is open, community access to the facility is limited for security reasons.
- Individuals in this setting have chosen a work program and have become comfortable with the socialization, income, and safety of a congregate work program.
- Individuals and their families have continually expressed concerns with health and safety as well as benefits (SSDI, Medical, etc...) and are concerned how community employment will affect them in these areas.

Remediation Plan:

PRIDE Industries has always focused on its mission to provide employment for people with disabilities both in their facilities and in the community. Our proposed remediation to Federal requirement 1 will focus on development of program elements that will facilitate the movement of individuals from congregate work to community based employment. This will include transitioning our work programs from a production based environment to a strict pre-vocational focus. Recognizing the paid work requirements of our program, paid work will still be an integral part of our program at this facility. The components of our Remediation Plan include:

- Rewriting all policies, procedures, program designs, and meeting plans to a full focus on community employment.
- Create an intranet web page that posts all available community employment both for group and individual placement. This to be reviewed quarterly with each individual.
- Develop a *Community Employment Navigator* position that will provide a resource for individualized transition and community employment support for all individuals in program. This position will also provide individuals and their families with education and support on benefit concerns.
- Develop a *Transitional Coordinator* position that will oversee these new Program elements:
 1. Systematic work experience, job exploration, internship, and volunteer work in the community for each individual.
 2. Coordination of Regional Center internship and employment bonus programs.
 3. Programmatic pre-employment transitional services as part of the individual's program day.

	<p>4. Oversight of monthly <i>Job Club</i> participation for each individual in program.</p> <ul style="list-style-type: none"> • Development of Certificated Vocational Training programs to be taught at the facility. PRIDE will soon be licensed with the Bureau of Private Post-Secondary Education to provide certificated training in Construction Skills, Logistics, Electronic Manufacturing, and Call Centers. These services are currently provided by PRIDE in other states under the PRIDE Ascend title. • Re-focus of Business Development activity from facility based contract work to Employer based group opportunities and individual placement opportunities. • Leverage current Employment Services resources to facilitate external internships, experiential employment opportunities, job exploration, and job development. We currently have 14 job developers and over 200 employer partners in our network <p>Remediation Goals</p> <ol style="list-style-type: none"> 1. 50% of our active Work Activity Program participants to be in Competitive Integrated Employment within 3 years. CIE is defined as group or individual placement into an integrated community environment at minimum wage or better. 2. Implementation of Certificated Vocational Training, Pre-employment Transitional Services, External Internships, Job Club, and Job Development as program components within 6 months. <p>How Funding Aids Compliance: Additional funding will be required for additional personnel (transition coordinator and community employment navigator) and for vehicle costs to provide in-program services to the community. Both of these budget items in conjunction with existing resources will allow us to immediately begin moving individuals into community based employment activity. Although the majority of the costs for implementing these objectives are currently imbedded the costs of personnel and travel would be extremely difficult for the facility to incur in our current funding environment.</p>
<p>Estimated budget; identify all major costs and benchmarks— attachments are acceptable</p>	<p>Please see attached.</p>
<p>Requested funding for 2016-17</p>	<p>1 Transition Coordinator 2 Community Employment Navigator, 1 Vocational Trainer, 2 Community Based Job Trainer & 2 Vans \$277,924.00</p>
<p>Estimated timeline for the project</p>	<p>One year to develop programmatic elements and 3 years to meet all benchmarks.</p>

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Vendor and vendor number	PRIDE Industries HN0199
Primary regional center	North Bay Regional Center
Service type and code	Work Activity Program - 954
Number of consumers currently serving	76
Barriers to compliance with the HCBS rules and/or project implementation	This facility meets all Federal Requirements with the exception of requirement #1. Individuals at this facility who receive Medicaid HCB Services currently work in a congregate work setting which limits their access to the greater community. The individuals working in this setting are provided with options for community integration and utilization of community resources but the nature of the setting limits their access to these options both by consumer choice and by work setting requirements.
Narrative/description of the project. Identify which HCBS federal requirements are currently out of compliance; include justification for funding request	<p>Review of Provider Compliance Evaluation:</p> <p>The results of this evaluation show that the facility clearly meets the Federal Requirements 2,3,4,5, and 10. Requirements 6-9 are not applicable to this facility as no Residential Services are provided. The guidance guidelines under Federal Requirement 1 are not being met at this facility specifically related to the individual's access to community integration and utilization of community services. As noted in the PCE, the components of the facilities setting that impede compliance with this requirement are:</p> <ul style="list-style-type: none"> The work setting is in a congregate work environment with multiple individuals with disabilities working together under the supervision of both disabled and non-disabled staff.

- The primary component of this work setting is production related with the average paid work at the facility at 66% of their Program day.
- Individuals in this setting have limited access to the community during their program day. Although the facility is open, community access to the facility is limited for security reasons.
- Individuals in this setting have chosen a work program and have become comfortable with the socialization, income, and safety of a congregate work program.
- Individuals and their families have continually expressed concerns with health and safety as well as benefits (SSDI, Medical, etc...) and are concerned how community employment will affect them in these areas.

Remediation Plan:

PRIDE Industries has always focused on its mission to provide employment for people with disabilities both in their facilities and in the community. Our proposed remediation to Federal requirement 1 will focus on development of program elements that will facilitate the movement of individuals from congregate work to community based employment. This will include transitioning our work programs from a production based environment to a strict pre-vocational focus. Recognizing the paid work requirements of our program, paid work will still be an integral part of our program at this facility. The components of our Remediation Plan include:

- Rewriting all policies, procedures, program designs, and meeting plans to a full focus on community employment.
- Create an intranet web page that posts all available community employment both for group and individual placement. This to be reviewed quarterly with each individual.
- Develop a *Community Employment Navigator* position that will provide a resource for individualized transition and community employment support for all individuals in program. This position will also provide individuals and their families with education and support on benefit concerns.
- Develop a *Transitional Coordinator* position that will oversee these new Program elements:
 1. Systematic work experience, job exploration, internship, and volunteer work in the community for each individual.
 2. Coordination of Regional Center internship and employment bonus programs.
 3. Programmatic pre-employment transitional services as part of the individual's program day.

	<p>4. Oversight of monthly <i>Job Club</i> participation for each individual in program.</p> <ul style="list-style-type: none"> • Development of Certificated Vocational Training programs to be taught at the facility. PRIDE will soon be licensed with the Bureau of Private Post-Secondary Education to provide certificated training in Construction Skills, Logistics, Electronic Manufacturing, and Call Centers. These services are currently provided by PRIDE in other states under the PRIDE Ascend title. • Re-focus of Business Development activity from facility based contract work to Employer based group opportunities and individual placement opportunities. • Leverage current Employment Services resources to facilitate external internships, experiential employment opportunities, job exploration, and job development. We currently have 14 job developers and over 200 employer partners in our network <p>Remediation Goals</p> <ol style="list-style-type: none"> 1. 50% of our active Work Activity Program participants to be in Competitive Integrated Employment within 3 years. CIE is defined as group or individual placement into an integrated community environment at minimum wage or better. 2. Implementation of Certificated Vocational Training, Pre-employment Transitional Services, External Internships, Job Club, and Job Development as program components within 6 months. <p>How Funding Aids Compliance: Additional funding will be required for additional personnel (transition coordinator and community employment navigator) and for vehicle costs to provide in-program services to the community. Both of these budget items in conjunction with existing resources will allow us to immediately begin moving individuals into community based employment activity. Although the majority of the costs for implementing these objectives are currently imbedded the costs of personnel and travel would be extremely difficult for the facility to incur in our current funding environment.</p>
<p>Estimated budget; identify all major costs and benchmarks— attachments are acceptable</p>	<p>Please see attached.</p>
<p>Requested funding for 2016-17</p>	<p>1 Transition Coordinator 2 Community Employment Navigator, 1 Vocational Trainer, 2 Community Based Job Trainer & 2 Vans \$277,924.00</p>
<p>Estimated timeline for the project</p>	<p>One year to develop programmatic elements and 3 years to meet all benchmarks.</p>

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Vendor and vendor number	PRIDE Industries – HN0128
Primary regional center	North Bay Regional Center
Service type and code	Adult Day - 515
Number of consumers currently serving	30
Barriers to compliance with the HCBS rules and/or project implementation	This facility meets all Federal Requirements with the exception of requirement #1. Individuals at this facility who receive Medicaid HCB Services currently participate in a congregate setting. Their services can include work activity and / or daily access to community integration activities. The individuals working in this setting are provided with options for community integration and utilization of community resources. Barriers to community integration include the necessary staff ratio to ensure safe community activities.
Narrative/description of the project. Identify which HCBS federal requirements are currently out of compliance; include justification for funding request	<p>Review of Provider Compliance Evaluation: The results of this evaluation show that the facility clearly meets the Federal Requirements 2,3,4,5, and 10. Requirements 6-9 are not applicable to this facility as no Residential Services are provided. The guidance guidelines under Federal Requirement 1 are not being met at this facility specifically related to the individual's access to community integration and utilization of community services. This access is currently designed in a congregate setting, wherein "groups" of individuals are provided access as opposed to individual community integration. As noted in the PCE, the components of the facilities setting that impede compliance with this requirement are:</p> <ul style="list-style-type: none"> The program setting is in a congregate environment with multiple individuals with disabilities working together under the supervision of both disabled and non-disabled staff.

- The secondary component of this setting is work related with the average paid work at the facility at 20% of their Program day.
- Individuals in this setting have limited access to the community during their program day. Although the facility is open, community access to the facility is limited for security reasons.
- Individuals in this setting have chosen a day program and have become comfortable with the socialization, income, and safety of a congregate program.
- Individuals and their families have continually expressed concerns with health and safety as well as benefits (SSDI, Medical, etc...) and are concerned how community employment will affect them in these areas.

Remediation Plan: PRIDE Industries has always focused on its mission to provide employment for people with disabilities both in their facilities and in the community. Our proposed remediation to Federal requirement 1 will focus on development of program elements that will facilitate the movement of individuals from congregate setting to community based activities which may include employment. This will include transitioning our programs from a congregate environment to a pre-vocational focus. Recognizing the paid work option of our program, paid work will be a choice in our program at this facility. The components of our Remediation Plan include:

- Rewriting all policies, procedures, program designs, and meeting plans to a full focus on community employment.
- Create an intranet web page that posts all available community employment both for group and individual placement. This to be reviewed quarterly with each individual.
- Develop a *Community Employment Navigator* position that will provide a resource for individualized transition and community employment support for all individuals in program. This position will also provide individuals and their families with education and support on benefit concerns.
- Develop a *Transitional Coordinator* position that will oversee these new Program elements:
 1. Systematic work experience, job exploration, internship, and volunteer work in the community for each individual.
 2. Coordination of Regional Center internship and employment bonus programs.
 3. Programmatic pre-employment transitional services as part of the individual's program day.

	<p>4. Oversight of monthly <i>Job Club</i> participation for each individual in program.</p> <ul style="list-style-type: none"> • Development of Certificated Vocational Training programs to be taught at the facility. PRIDE will soon be licensed with the Bureau of Private Post-Secondary Education to provide certificated training in Construction Skills, Logistics, Electronic Manufacturing, and Call Centers. These services are currently provided by PRIDE in other states under the PRIDE Ascend title. • Re-focus of Business Development activity from facility based contract work to Employer based group opportunities and individual placement opportunities. • Leverage current Employment Services resources to facilitate external internships, experiential employment opportunities, job exploration, and job development. We currently have 14 job developers and over 200 employer partners in our network <p>Remediation Goals</p> <ol style="list-style-type: none"> 1. 30% of our active Day Program participants to be in Competitive Integrated Employment within 3 years. CIE is defined as group or individual placement into an integrated community environment at minimum wage or better. 2. Implementation of Certificated Vocational Training, Pre-employment Transitional Services, External Internships, Job Club, and Job Development as program components within 6 months. <p>How Funding Aids Compliance: Additional funding will be required for additional personnel (transition coordinator and community employment navigator) and for vehicle costs to provide in-program services to the community. Both of these budget items in conjunction with existing resources will allow us to immediately begin moving individuals into community based employment activity. Although the majority of the costs for implementing these objectives are currently imbedded the costs of personnel and travel would be extremely difficult for the facility to incur in our current funding environment.</p>
<p>Estimated budget; identify all major costs and benchmarks— attachments are acceptable</p>	<p>Please see attached.</p>
<p>Requested funding for 2016-17</p>	<p>2-Community Employment Navigator, 2- Vocational Trainer, 1-Community Based Job Trainer 1- Van \$222,479.00</p>
<p>Estimated timeline for the project</p>	<p>One year to develop programmatic elements and 3 years to meet all benchmarks.</p>