

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

The Home and Community-Based Services (HCBS) rules ensure that people with disabilities have full access to, and enjoy the benefits of, community living through long-term services and supports in the most integrated settings of their choosing. In order to assist in determining eligibility for compliance funding, providers must complete this evaluation. Both “Yes” and “No” answers require an explanation. A “No” response *could* mean a service setting is out of compliance with the HCBS rules and is potentially eligible for funding to make necessary adjustments. Once this evaluation is completed, it should act as a guide for filling out the provider compliance funding concept, which is required for any provider to be eligible for compliance funding. **Completion of this evaluation is for the sole purpose of applying for compliance funding and does not take the place of future provider assessments that the Department may require to determine provider compliance with the HCBS settings rules. Only providers requesting compliance funding need to complete this evaluation.**

Federal Requirements #1-5 apply to providers of all services, including residential and non-residential settings. Federal Requirements #6-10 are additional requirements that apply only to provider-owned or controlled residential settings.

The column labeled “Guidance” contains a series of questions intended to help identify compliance or non-compliance with each requirement as it relates to the HCBS rules. While responses to these questions can help in the determination of whether or not a particular requirement is met, these responses may not be the sole factor in this determination.

More information on the HCBS rules and this form can be found at www.dds.ca.gov/HCBS.

Questions may be directed to HCBSregs@dds.ca.gov.

Date(s) of Evaluation: November 11, 2019	Completed by: Nancy Niebrugge, Deputy Executive Director
Vendor Name, Address, Contact: The Campbell Center (TCC), 6512 San Fernando Road, Glendale, CA 91201, David Fields, Executive Director	
Vendor Number: HD 0142	
Service Type and Code: Community Integration Program 055	

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<p><u>Federal Requirement #1:</u> <i>The setting is integrated in, and supports full access of individuals receiving Medicaid HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Do individuals receive services in the community based on their needs, preferences and abilities? • Does the individual participate in outings and activities in the community as part of his or her plan for services? • If an individual wants to seek paid employment, does the home staff refer the individual to the appropriate community agency/resource? • Do individuals have the option to control their personal resources, as appropriate?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please explain: TCC's current community integration program is based on the former Pastimes model that was originally designed to serve the needs of seniors on-site. The new program design approved by FDLRC allowed for the integration of adults of all ages in the community. When the WAP program closed August 1, 2019, 15 adults of all ages moved to Pastimes, nearly doubling the number of clients served. This has required our newly hired community support specialists and the coordinator to find multiple new volunteering and community engagement partnerships all at once. Our current departmental structure is not adequate to address this one-time task of addressing all client needs as once, and our staff lack adequate training in resource development to find the breadth and variety of community partners to meet the full array of client interests.</p>	
<p><u>Federal Requirement #2:</u> <i>The setting is selected by the individual from among setting options, including non-disability-specific settings and an option for a private unit in a residential setting. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs, preferences, and, for residential settings, resources available for room and board.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Does the provider have a current regional center Individual Program Plan (IPP) on file for all individuals? • Does each individual's IPP document the different setting options that were considered prior to selecting this setting?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please explain: All clients are served in the community, but due to the very recent transition, the true diversity of interests are not yet being met due to a lack of staff training. Some Pastime staff members, including the coordinator, have been trained in person-centered thinking, but newer staff are not trained in how to support clients in</p>	

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selecting individually based options. The Coordinator and Deputy Executive Director need to become certified trainers on person-centered practices in order to provide ongoing training for new staff members. Additional staffing support is also needed to review case files and ensure IPPs are current, and ensure that daily notes address needs outlined in the individual plans.

Federal Requirement #3:

Ensures an individual's rights of privacy, dignity and respect, and freedom from coercion and restraint.

Guidance:

- Does the provider inform individuals, in a manner they can understand, of their rights to privacy, dignity, respect, and freedom from coercion and restraint?
- Does the provider communicate, both verbally and in writing, in a manner that ensures privacy and confidentiality?
- Do staff communicate with individuals based on their needs and preferences, including alternative methods of communication where needed (e.g., assistive technology, Braille, large font print, sign language, participants' language, etc.)?

Does the service and/or program meet this requirement? **Yes** **No**

Please explain: Clients receive trainings through already established PowerPoint presentations, handbooks and brochures to inform them of their rights. Materials are also available in Armenian.

Federal Requirement #4:

Optimizes but does not regiment individual initiative, autonomy, and independence in making life choices, including, but not limited to, daily activities, physical environment, and with whom to interact.

Guidance:

- Does the provider offer daily activities that are based on the individuals' needs and preferences?
- Does the provider structure their support so that the individual is able to interact with individuals they choose to interact with, both at home and in community settings?
- Does the provider structure their support so that the individual is able to participate in activities that interest them and correspond with their IPP goals?

Does the service and/or program meet this requirement? **Yes** **No**

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Please explain: Staff and clients are paired based on shared interest in community activities and compatibility. The schedule includes standing volunteering and community class options, but also 'open' activity options that are client-driven and scheduled that day according to client preference. Newer staff will benefit from person-centered training to better match IPP goals with program options.

Federal Requirement #5:

Facilitates individual choice regarding services and supports, and who provides them.

Guidance:

- Does the provider support individuals in choosing which staff provide their care to the extent that alternative staff are available?
- Do individuals have opportunities to modify their services and/or voice their concerns outside of the scheduled review of services?

Does the service and/or program meet this requirement? **Yes** **No**

Please explain: Clients are encouraged to voice their preference at any time. Staff also note if behavioral issues might reflect a poor fit or lack of compatibility and meet with the client to adjust the schedule.

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Only providers of services in **provider-owned or controlled residential settings** need to complete the remainder of this evaluation. In **provider-owned or controlled residential settings**, in addition to the above requirements, the following requirements must also be met:

<p><u>Federal Requirement #6:</u></p> <p><i>The unit or dwelling is a specific physical place that can be owned, rented or occupied under a legally enforceable agreement by the individual receiving services, and the individual has, at a minimum, the same responsibilities and protections from eviction that tenants have under the landlord/tenant law of the State, county, city or other designated entity. For settings in which landlord/tenant laws do not apply, the State must ensure that a lease, residency agreement or other form of written agreement will be in place for each participant and that the document provides protections that address eviction processes and appeals comparable to those provided under the jurisdiction's landlord tenant law.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • As applicable, does each individual have a lease, residency agreement, admission agreement, or other form of written residency agreement? • Are individuals informed about how to relocate and request new housing?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please explain: Click or tap here to enter text.</p>	
<p><u>Federal Requirement #7:</u></p> <p><i>Each individual has privacy in his/her sleeping or living unit:</i></p> <p><i>Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors as needed.</i></p> <p><i>Individuals sharing units have a choice of roommates in that setting.</i></p> <p><i>Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Do individuals have a choice regarding roommates or private accommodations? • Do individuals have the option of furnishing and decorating their sleeping or living units with their own personal items, in a manner that is based on their preferences? • Do individuals have the ability to lock their bedroom doors when they choose?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please explain: Click or tap here to enter text.</p>	

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<p><u>Federal Requirement #8:</u> <i>Individuals have the freedom and support to control their own schedules and activities, and have access to food at any time.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Do individuals have access to food at any time? • Does the home allow individuals to set their own daily schedules? • Do individuals have full access to typical facilities in a home such as a kitchen, dining area, laundry, and comfortable seating in shared areas?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No Please explain: Click or tap here to enter text.</p>	
<p><u>Federal Requirement #9:</u> <i>Individuals are able to have visitors of their choosing at any time.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Are visitors welcome to visit the home at any time? • Can individuals go with visitors outside the home; such as for a meal or shopping, or for a longer visit outside the home, such as for holidays or weekends?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No Please explain: Click or tap here to enter text.</p>	
<p><u>Federal Requirement #10:</u> <i>The setting is physically accessible to the individual.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Do individuals have the freedom to move about inside and outside the home or are they primarily restricted to one room or area? • Are grab bars, seats in bathrooms, ramps for wheelchairs, etc., available so that individuals who need those supports can move about the setting as they choose? • Are appliances and furniture accessible to every individual?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No Please explain: Click or tap here to enter text.</p>	

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CONTACT INFORMATION

Contact Name: David Fields
Contact Phone Number: 818 242-2434
Email Address: david@thecampbell.org

ACKNOWLEDGEMENT

By checking the box below, I acknowledge that completion of this evaluation is for the sole purpose of applying for compliance funding and does not take the place of future provider assessments that the Department may require to determine provider compliance with the HCBS settings rules.

I AGREE

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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

Vendor name	The Campbell Center
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compliance evaluation form as one packet to the regional center with which it has primary vendorization.

Instructions:

- The concept form on the next page must be used, may not exceed four pages plus the budget worksheet and any cost back up, and must be kept in Arial 12-point font. Submit the form in Microsoft Word or PDF format. An extra half page is permitted to answer questions about prior funding, but the rest of the concept must be within the standard page requirements.
- There has been a significant change in the form and process compared to prior years. **In order to receive funding, this 2019-20 form must be used.**
- For providers that operate programs with several vendor numbers involved in one concept, one evaluation and concept form should be submitted and should list all vendor numbers for related/included programs. If multiple programs owned by the same parent company have different compliance evaluations or concepts, additional applications can be submitted but should be attached in the same document as the other owned programs so they can be reviewed together.
- The results of the evaluation should be clearly laid out in the section referring to identification of federal requirements that are currently out of compliance, which the concept will address.
- The concept form includes detailed information that describes the funding requests and supports how the requests will assist the provider to come into compliance.
- There should be a clear link between what is being requested and the federal requirement currently out of compliance.
- Concepts should demonstrate how the requested change in service delivery will impact individuals in offering more choices or opportunities in the community.

Strengths of previously funded concepts:

- Identified the need as well as proposed a plan to provide outreach and information regarding the HCBS rules to individuals served and members of their support teams.
- Discussed the need for additional funds in order to effectively support individuals served on a more individualized basis in overcoming barriers to community integration and employment, as appropriate.
- Prioritized the preferences of individuals served and utilized their feedback in the development of the concept.
- Implemented train-the-trainer certification for person-centered planning/thinking and training regarding the HCBS rules.
- Enabled residents to age in place and exercise more choice and independence.

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Vendor number(s)	HD 0142
Primary regional center	Frank D. Lanterman Regional Center
Service type(s)	Community Integration Program
Service code(s)	055
Number of consumers currently served	29
Current staff to consumer ratio	3:1
<p>1. Please provide a brief description of the service/setting that includes what a typical day consists of and how services are currently provided. This response must include the baseline/current levels for any aspects of the program for which the concept proposes funding.</p>	
<p>We currently have 29 clients, having just added 2 more in October. We see additional demand as other former WAP clients are still looking for ways to be social and engaged, and not all are interesting in pursuing employment. We offer up to 8 options that can be scaled to accommodate new clients, including an 'open' session that is client-directed and specific to their preferences. Scheduling for Pastimes clients is done weekly by the coordinator with daily updates based on attendance and staff to client ratios. Options include volunteering in the community, taking classes such as dance or gardening, and exercise classes at a senior center. Many staff members are new to our program and the role of providing community integration support. Our goal is to expand the number of options on our schedule, as well to improve our ability to review IPPs, provide full person-centered plans for all, and better identify unique community opportunities.</p>	
<p>Project Narrative Description:</p>	
<p>2. Please provide a brief summary narrative of the concept for which you are requesting funding, including justification for the funding.</p>	
<p>To better address individual client preference for both our senior and now younger adults, our needs are twofold. First, we need additional funding to bear the cost of developing in-house training capabilities. We are requesting 2 staff members attend a comprehensive 'train-the-trainer' program to become certified to provide person-centered training to our newer support staff who accompany our clients. Turnover requires us to have the ability to provide ongoing training. Newly hired staff lack the interviewing, notetaking and problem-solving skills needed to address individual client needs, and they need instruction on how be more involved in the planning process for person-directed community engagement. Such training is beyond our current budget, as it includes several steps, including observing a training and then being evaluated while providing a training. Second, additional funding is needed add a staff member to support our coordinator for an interim period so we can establish appropriate plans for all our new Pastimes clients and retool our current logistics to provide individualize support. With additional staffing, we seek to develop a client management system better designed for managing individual preferences and community integration. Additional support would also ensure we establish the variety of community partnership needed to meet better support the wider age range of clients now served in Pastimes. Once our</p>	

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transition backlog is addressed, new systems are established for the newly designed Pastimes program and our support staff are better trained, the need for the specialist will diminish. Our coordinator can then absorb the more typical volume of new clients going forward.

3. Identify which HCBS federal requirements this concept addresses that are currently out of compliance. Could be all or a subset of those identified as out of compliance on the evaluation.

1__XX 2__XX__ 3__ 4__ 5__ 6__ 7__ 8__ 9__ 10__

4. For each HCBS out-of-compliance federal requirement that is being addressed by this concept, describe the barriers to compliance and why this concept is necessary. If this information is in the evaluation section, please copy it here.

#1: In the first three months our Pastimes Coordinator has been challenged in finding community integration options that work for both our pre-existing senior Pastimes population and the 15 newly added young adults that were former WAP clients. The scheduling responsibilities for our coordinator doubled, leaving her no time for quality assurance and finding new classes and activities. Additionally, since many clients were adjusting to new routines, the process has required multiple attempts to find the right fit for each client, both in terms of activity and personality. A specialist who can support our coordinator will help us adequately address the full program goals by spreading out the responsibilities, allowing us to address our current backlog.

: #2: Due to the sudden increase in Pastimes clients, we had to quickly hire several new support staff, who all need better training in person-centered-planning. All clients are served in the community, but due to the very recent transition, the true diversity of interests are not yet being met. Newer staff are not adequately trained in the type of person-centered planning needed to support clients in selecting individually based options. Without a certified trainer, we lack the ability to provide frequent, appropriate staff training as new staff are hired.

5. For each out-of-compliance federal requirement that is addressed in this concept, please explain how the concept will bring the vendor into compliance.

#1: Adding a specialist to support our coordinator will allow us to expand our options, so we can provide a wider variety of activity options to this expanded group of clients as mandated by a person-centered approach. Clients are enjoying the options provided, but additional staff time is necessary to seek out new venues and relationships that match expressed client interest.

#2: In TCC's 2017-18 proposal, we originally identified the need for sending two key staff through a 'train the trainer' program and were granted funds to seek certification. However, that portion of the proposal was not pursued due to a change in leadership in the organization, and the funds were returned. A new Executive Director was hired in July 2019, and a new Deputy Executive Director was added in August, just as the WAP program was coming to a close and the large number of clients shifted into Pastimes. The new leadership team is now positioned to pursue the original concept and invest in a training program to support new staff members. Adding this training component to our program will help us better guide our clients to more individualized outings, rather than

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relying on established opportunities.
6. What are the proposed outcomes and objectives of the concept, and what are the methods of achieving and tracking them?
Notes are not currently outcome-oriented. With training and more support we can establish documentation standards that demonstrate client growth. In this new concept we will establish progress indicators for each client, and train staff to address specific indicators as they are being met. In addition to notes, we would add a Likert scale option where staff can rank client progress toward specific goals. We would then set benchmarks for program progress, setting a minimum standard for the number of clients program-wide who demonstrate progress.
7. Please describe how and/or what was done to include input from the individuals served in developing this concept? Discuss not only the development of the concept, but also what steps were taken to identify the interests and desires of the individuals and who was involved in that process.
As many former WAP clients have now engaged in Pastimes, they have expressed a need to expand options. The Coordinator has met with clients about their satisfaction with their activities and asks them what additional things they are interested in. She also talks regularly with the support staff about client attitudes and interest level as indicators of client satisfaction. Through this process clients have indicated interest in options that would require establishing new community partners. We are in the process of meeting clients to update their plans and learn more about what they desire. With this concept we will have a greater capacity to meet their needs.
8. Please describe how the concept you propose will enable you to provide more person-centered services to your clients.
Adding a specialist role will accelerate our ability to update plans, which at this time our one coordinator is not able to absorb. The specialist will also increase our capacity to find more options specific to personal tastes and interests. Training will help support staff better implement plans that have been established, enhancing each client's experience in the community.
9. Please address your plan for maintaining the benefits, value, and success of your project at the conclusion of 2019-20 HCBS Funding.
Providing this funding will help jump start our reimagined Pastimes concept. After this initial transition is complete, our coordinator/specialist team will have expanded our community contacts, adjusted our internal systems for scheduling and client management, and developed additional training materials and options for future staff members. Once trained, all staff will be able to maintain the program using the improved systems and quality controls.
10. Write a brief narrative below explaining each major cost category and timeline. Complete the budget template at the end of the concept sheet. An excel version with formulas is available. When applicable, budgets should include personnel/benefits, operating costs such as consultants or training, administrative expenses/indirect costs, and capital costs (assets lasting more than 2 years). If project spans 2 years or occurs in phases, budget should be separated by phase/year.

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Administrative costs, if any, must comply with DDS' vendor requirements, including a cap of 15% of the sum of personnel/benefits, consulting, and operating costs (must exclude capital costs).

http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4629.7&lawCode=WIC

Category: Personnel

Addition of 1 staff member: Community Integration Specialist

1 FTE at 40 hours per week x \$16 per hour = \$640 per week x 52 weeks/year = \$33,280

Employee benefits calculated at 9% of salary = \$33,280 x 9% = \$2,995

\$36,275 per year, for two-year period, beginning May 2020 and ending June 2022

TOTAL = \$72,550

Category: Operating Costs

Consultant to provide 'Train the Trainer' trainings for 2 staff members

Cost for Joe Donofio, who is a certified mentor/coach through the Learning Community of Person Centered Practices, to provide training and certification for two key Pastime staff members = \$22,000 total.

11. Please address sustainability of funding sources for all programs or concepts requiring any funding past the time frame of the requested grant, especially those that involve staff or other long-term costs. Please mark "not applicable" if costs will all be incurred during the program time frame.

Category: Addition of 1 staff member: Community Integration Specialist

After a two-year period of establishing this program, we anticipate that natural demand for services with result in serving more clients and allow us to leverage more economies of scale. We also anticipate we will be able to grow our ability to solicit donations in support of this new program model.

Category: Consultant to provide 'Train the Trainer' certification -- Not Applicable

Once established, trainers will be able to provide training needed for new staff members.

12. Have you or the organization you work with been a past recipient of DDS funding? If yes, what fiscal year(s)?	HCBS Funding ___ No <u>X</u> Yes.	
	If Yes, FY(s) <u>17-18</u>	
	Disparity Funding <u>x</u> No ___ Yes.	If Yes, FY(s)

	CPP Funding <u>x</u> No ___ Yes.	If Yes FY(s)

	If yes to any question be sure to answer questions 13 and 14.	

For providers who have received prior HCBS, Disparity or CPP Funding from DDS

13. If your organization has received prior funding from any of the above sources, please provide an update on the prior funding project. You may copy and paste from progress update(s) previously provided to regional centers or DDS.

July – December 2018:

HCBS Progress Report Funding FY 17-18

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July – December 2018:

1. Provide one person centered training to all 64 work activity program clients
2. Provide five person centered trainings to 18 staff & 15 board members

Tom Pomeranz provide 5 trainings from the Universal Lifestyles Curriculum over a one week period. All trainings addressed challenges which commonly arise when transitioning from site-based services to community and focus on Person centered services.

3. Certify two staff as Train the trainer facilitators. Training will be provided by Joe Donofio.

4. Certified train the trainer facilitators will train the remaining staff at The Campbell Center
Funding awarded for this category was formally returned due to organizational leadership transitions that resulted in an inability to complete within the specified timeframe.

January – June 2019:

1. Prepare transition plans for all remaining work activity program clients by July 31, 2019, in preparation for the August 1, 2019 closure of the program.

Person-centered practices learned through the provided training were applied to update 44 WAP client IHSPs in early 2019. Updated IHSPs appropriately reflect client goals for both employment and outside activities, their preferences in regard to community inclusion, and individualized support needed. Some clients chose to seek day programs provided by other vendors. Based on these new plans, TCC arranged to hire 5 former WAP clients as Production Workers for it's integrated Fulfillment Center; 1 was hired by TCC as an administrative assistant and 15 WAP clients transitioned to TCC's Pastimes Community Integration program.

July – September 2019:

1. Provide job coaching for newly hired production associates and admin assistant
2. Evaluate former clients' success at transitioning to Pastimes.

Person-centered practices informed the independence, new-skill acquisition and productivity goals set for 5 newly hired production workers and the administrative assistant. Activity options selected by the new Pastimes clients were also based on person-center planning.

14. If your organization received prior funding, please explain how the current funding request is not redundant with any prior funding received and/or builds on the prior funding but was not part of the original funding.

The current funding request builds on the previous request in two ways. First, it replaces funding that was granted previously and then returned due to organizational changes in leadership. With new leadership in place we are now in a stable position to send key staff to complete the training and begin training community integration staff. Second, the 2-year funding for a Community Integration Specialist is requested to build on the training already provided and facilitate the scale-up of program implementation and quality control.

HCBS CONCEPT BUDGET							
Vendor Name		The Campbell Center					
Vendor Number(s)		PD0629					
	Salary and Benefits	Year 1 Budget		Year 2 Budget		Total	
		FTE	Annual Cost	FTE	Annual Cost	Cost	
Personnel (salary + benefits)							
Community Integration Specialist	36,275	1.00	\$ 36,275	1.00	\$ 36,275	\$ 72,550	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Personnel Subtotal			\$ 36,275		\$ 36,275	\$ 72,550	
Operating expenses							
Train the Trainer Certification for 2 staff			\$ 22,000			\$ 22,000	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Operating Subtotal			\$ 22,000		\$ -	\$ 22,000	
Administrative Expenses							
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Administrative Subtotal			\$ -		\$ -	\$ -	
Capital expenses							
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Capital Subtotal			\$ -		\$ -	\$ -	
Total Concept Cost			\$ 58,275		\$ 36,275	\$ 94,550	

See Attachment F for budget details and restrictions