

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: 11/19/2019	Completed by: Amed Franco
Vendor Name, Address, Contact: Vocational Innovations Inc. 1532 E San Bernardino Ave. B1-B5 Pomona Ca 91767 (909)971-3280	
Vendor Number: PP6437, PP6436	
Service Type and Code: Community Integration, 055 & 110	

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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: Vocational Innovations supports individuals who have been deemed difficult to serve due to the intensity of their behavioral challenges. Many of these individuals have transitioned out of developmental centers, have forensic backgrounds, have mental health diagnosis, and have severe behavioral issues such as physical aggression, elopement, and property destruction. Serving them in the community can be challenging at times especially in structure settings such as integrated employment environments. Although we do have a community integration component, it is difficult at times to serve these individuals safely in the community and at the same time find places of employment that best match individual preference and abilities. Vocational interest are not always appropriately defined and/or expressed by clients which often leads to clients losing employment and more behavioral issues at the work place. Sustainable employment has become a challenge and requires additional supports to help clients find their true vocational interest and end the on-going cycle of job turnover.</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 individuals' 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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Please explain: All individuals that attend our program have a current IPP. Regional Center works with each individual and provides them with program options before they are enrolled in our program.

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: All individuals are informed of their personal rights in a manner that they can understand. Communication is achieved both verbally and in writing or through a form of communication an individual can understand. Privacy and confidentiality is maintained at all times.

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: Vocational Innovations strives to encourage each individual to advocate for themselves and engage in daily activity planning and choice making. Individuals are encouraged to interact with all peers and engage to build meaningful relationships with peers of their liking. Vocational goals are often not met because of behavioral challenges, regression, and goals that are not appropriately set. Our staffing does not have the qualifications to conduct vocational assessments that truly let us know what a client's vocational interest and strengths are. Often times we see personal (leisure) interest mistaken for vocational interest which don't always align.

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: : All clients are encouraged by all members of our organization to advocate for themselves and engage in daily activity planning and choice making. We have an open-door policy where individuals are encourage to voice opinions, questions, and concerns.

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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: N/A</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: N/A</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: N/A</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: N/A</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: N/A</p>	

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CONTACT INFORMATION

Contact Name: Amed Franco
Contact Phone Number: (909)971-3280
Email Address: afranco@vocinnovations.com

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 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.

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

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Vendor name	Vocational Innovations Inc.
Vendor number(s)	PP6437, PP6436
Primary regional center	San Gabriel Pomona Regional Center
Service type(s)	Community Integration/Behavior Management
Service code(s)	055 & 110
Number of consumers currently served	29
Current staff to consumer ratio	1:1 and 1:2 ratios
<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>Vocational Innovations supports individuals who have been deemed difficult to serve due to the intensity of their behavioral challenges. Many of these individuals have transitioned out of developmental centers, have forensic backgrounds, have mental health diagnosis, and have severe behavioral issues such as physical aggression, elopement, and property destruction. Services are provided in a 1:1 and 1:2 ratio (staff to client) at our site-based center with opportunities for community integration. An individual service plan is created for each person supported and an individual's day is structured with programming and activities based on skills, vocational, and behavioral goals.</p> <p>Currently we have 2 clients working in paid internships 6 to 8 hours per week and have 1 client working in competitive integrated employment 2 hours per week. We have many clients that have the potential to be employed but we must first establish the proper foundation to provide the right training/preparation and supports. Over the last year we have had many people cycle out of employment because of lack of preparation, coping skills, and behavioral challenges. Our goal with our funding request is to ensure we are providing our clients with independence, choices, rights, opportunities to integrate and have full access to the benefits of the community, including integrated employment.</p>	
Project Narrative Description:	
<p>2. Please provide a brief summary narrative of the concept for which you are requesting funding, including justification for the funding.</p> <p>1) Vocational goals need to be developed by a Vocational Specialist who has a background in rehabilitation. Individuals need to be assessed to discover vocational abilities, strengths, and interest. Individuals interested in employment need to be put on the right path to success and provided with opportunities that</p>	

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are realistic and compliment their vocational interests and abilities. Remediation plans need to be created when clients lose employment and realistic steps need to be developed to get them back on the vocational path. Having a vocational specialist is equivalent to having a behaviorist develop a behavior plan. If the foundation/assessment is not developed correctly then the interventions will not work, and goals will not be met.

- 2) Currently most clients that can work are supported in a 1:2 ratio but their employment is individualized which creates a financial burden on us. Staffing challenges need to be addressed by obtaining funding to hire vocational trainers to be assigned to individuals who work in integrated setting during their set work hours. This creates a stable pool of staff that will be available to support individuals in an integrated work environment, reduces the financial strain on us as a provider, allows us to pursue more vocational goals for more than just one or two clients at a time, and provides each individual served with the same opportunity for employment. These vocational trainers will be individually trained by our vocational rehabilitation specialist and behaviorist on how to encourage individuals to maximize abilities and how to deal with behavioral challenges that arise in order to break the 1 to 2 hour a day work barrier.

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 X 2 3 4 X 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.

Federal Requirement # 1 & # 4 – The core and foundation of HCBS guidelines revolve around Independence, Choice, Rights, Opportunities to integrate and have full access to the benefits of the community, including integrated employment.

Barriers:

- 1) Vocational Goals are often not appropriately defined or expressed by clients. Leading to unrealistic vocational goals. Often personal/recreational interest are mislabeled as vocational interest and individuals supported have difficulty maintaining employment creating a cycle of job loss, disillusion, and more importantly loss of morale and motivation for the individuals supported as well as the staff that support them.
- 2) Staffing has become a challenge for integrated employment. Integrated employment is supported on an individual basis, but most clients that have the ability to obtain integrated employment are served in a 1:2 staff to client ratio. Most clients have no work experience and initially cannot work a full day and often start employment with limited hours, a couple days a week. This often becomes a financial burden on the program as additional staff must be hired to work more hours than the client is supported at the job site.

The barriers listed above are all real and need to be addressed in order for us to be a truly person centered and offer the individuals we support a realistic opportunity to be

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successful in an integrated work environment. Individuals need to have all the opportunities and supports to maximize their abilities, discover their core vocational strengths, learn the coping skills necessary to sustain employment, and most importantly develop a sense of purpose in their lives by becoming productive members of their community.

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.

Our clients want to work and make money. They want to feel like they are part of the community and engage in meaningful activities that provide a sense of self-worth. They want to have access to all the benefits of the community just like any other person. We want to be able to provide them with all the supports they need to be successful in meeting their vocational goals. We believe hiring a vocational specialist will help us set the foundation for opening doors to their vocational path and hiring trainers will insure highly qualified staff are there to support them in their work setting.

6. What are the proposed outcomes and objectives of the concept, and what are the methods of achieving and tracking them?

Our goal is to have 50% of the clients supported obtain integrated employment. Clients will be put through a soft skills program to teach them how to seek employment. Employment data will be tracked to quantify the # of people employed, # of hours worked p/week and the length of employment.

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.

Over the last 12 months we have been diligently working with individuals to meet their vocational needs and preferences. We have been working with individuals to figure out what is important to them and what we can do to support them in the environment of their choosing. We have conducted preference surveys and skills inventories to try to develop appropriate supports.

8. Please describe how the concept you propose will enable you to provide more person-centered services to your clients.

Our program has been working diligently to instill person center practices from the development of the individual service plan to the building of a daily schedule. By providing the requested funding you would allow us to ensure that we are providing clients with the opportunities, proper training, and supports for employment when they express an interest in this domain.

9. Please address your plan for maintaining the benefits, value, and success of your project at the conclusion of 2019-20 HCBS Funding.

1) The Vocational Rehabilitation Specialist will work in conjunction with a management staff. The specialist will also be required to compile assessment tools, curriculum, develop employment templates and written processes to create a sustainable model.

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- 2) Having a stable pool of qualified job coaches will help the clients we support break the 1 to 2 hour a day work barrier. This is instrumental to not only the success of the clients but to create a cultural shift in mindset. Once enough clients obtain normalized employment, we can hire staff that work regular work hours without it being a financial burden on the organization.

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.

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

- 1) The estimated cost associated (wage, benefits, payroll taxes, workers compensation) with hiring a vocational rehabilitation specialist to truly assess client's vocational interest/skills and develop employment plans will be \$90,000. Estimated timeline for recruitment & hire 90 days. Completion of project 24 months.
- 2) The estimated cost to hire 2 vocational trainers to provide support for integrated employment is \$125,280. This takes in to account the cost associated (wage, benefits, taxes, workers compensation) with trainers \$20 p/hour- 30 hours a week. Time line to hire 90 days. Length of time to break the 1 to 2 hour a day work cycle 24 months.

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.

N/A

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 X Yes. If Yes, FY(s) 2018
 Disparity Funding X No ___ Yes. If Yes, FY(s) _____
 CPP Funding ___ No X Yes. If Yes FY(s) 2013-2014

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.

HCBS

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- 1) Van was purchased to facilitate community integration and respond to behavioral challenges in the community. Van is utilized daily.
- 2) All staff has undergone the 2-day person centered training course and 1 staff is almost done with a person-centered trainer certification. PCT tools are being utilized and staff are working on client one-page descriptions.
- 3) A community liaison was hired to help bridge the gap between our program and the community at large to help obtain volunteer sites and employment opportunities.
- 4) Management staff is schedule to attend person center facilitator review courses in the coming months.

CPP

- 1) CPP funds were award in response to an RFP for a specialized day program to support individuals who transitioned out of developmental centers, have forensic backgrounds, have mental health diagnosis, and have severe behavioral issues. Funds were used for the startup cost for the development of this program.

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.

Prior HCBS award was used to provide a mode of transport (van) for clients to access the community, hire a community liaison to help connect our program with community opportunities, and to provide training to develop person centered practices, but we are missing the components necessary to help clients develop a strong foundation to be job ready and the proper supports to break the 1 to 2 hour a day work barrier. This proposal request funding to address these issues and ensure that the money already awarded is not wasted on an endless cycle of job turn over for the people we support.

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HCBS CONCEPT BUDGET							
Vendor Name		Vocational Innovations					
Vendor Number(s)		PP6437, PP6436					
	Salary and Benefits	Year 1 Budget		Year 2 Budget		Total	
		FTE	Annual Cost	FTE	Annual Cost	Cost	
Personnel (salary + benefits)							
Vocational Rehabilitation Specialist	\$45,000	1.00	\$ 45,000	1.00	\$ 45,000	\$ 90,000	
Vocational Trainer	31320	1.00	\$ 31,320	1.00	\$ 31,320	\$ 62,640	
Vocational Trainer	31320	1.00	\$ 31,320	1.00	\$ 31,320	\$ 62,640	
Vocational Trainer			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Position Description			\$ -		\$ -	\$ -	
Personnel Subtotal			\$ 107,640		\$ 107,640	\$ 215,280	
Operating expenses							
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Operating Subtotal			\$ -		\$ -	\$ -	
Administrative Expenses							
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Administrative Subtotal			\$ -		\$ -	\$ -	
Capital expenses							
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Capital Subtotal			\$ -		\$ -	\$ -	
Total Concept Cost			\$ 107,640		\$ 107,640	\$ 215,280	

See Attachment F for budget details and restrictions