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 https://www.dds.ca.gov/initiatives/cms-hcbs-regulations/.

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

Date(s) of Evaluation: 3/20 & 1/21	Completed by: Nancy Niebrugge, Deputy Executive Director					
Vendor Name, Address, Contact: The Campbell Center (TCC), 6512 San Fernando Road,						
Glendale, CA 91201, David Fields, Executi	ve Director					
Vendor Number: HD0365						
Service Type and Code: 950						

Federal Requirement #1:

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.

Guidance:

- 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?

Please explain: Prior to TCC submitting the HCBS self assessment in 2020, we conducted a client survey of all clients, including those in Supported Employment Groups. This survey confirmed that our SEP group clients fully understand and are exercising their right to work, to engage in the larger community and to control their own resources.

Federal Requirement #2:

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.

Guidance:

- 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?

Does the service and/or program meet this requirement? $\ \ \Box$ Yes $\ \boxtimes$ No

Please explain: In our assessment survey, responses to some questions regarding choice of employment were mixed. While 100% said they had been given a choice about their job—the actual responses implied that percentage was more about their choice of whether or not they wanted to work, not what type of work they could choose. On the follow up question about choosing to work in a group, of the 11 respondents, 83% said they chose to work in a group, and only 75% felt they were given a choice about which group to join. This is likely due to the fact that our clients have been associated with their groups for a decade or more and may not been as encouraged as newer clients have been to make new choices. When asked on the survey whether or not they were given the choice to look for work 'not in a group,' only 67% said they had been. We also did not

score as well as we would have liked on whether clients understood their right to change their work situation. Only 58% said they understood this right. With clients now furloughed, we would like to take this opportunity to add additional expertise and fully reassess our group clients' needs, abilities and desires, as part of our overall plan to renew Person Centered Plans and begin to transition the entire program away from group contracts by 2023. Below is a link to our survey results.

https://docs.google.com/forms/d/1DuLAYWvuqt4SZPXBVoKBiulK VUkfT-dA09okbCcwdU/edit#responses

Federal Requirement #3:

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

<u>Guidance:</u>

- 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? $\ \ \, \boxtimes \, \,$ Yes $\ \ \, \Box \, \,$ No

Please explain: Based on this survey, 11 out of 12 clients responded that they feel they have a right to privacy and that their wishes are respected. Individual responses confirm this with statements such as "I feel respected," and "Yes, I have privacy at home. I have privacy here (at TCC)." Clients rights are reviewed at least annually, as well as during planning sessions. All client records are kept confidential. We employ bilingual staff to support our Armenian-speaking clients. All handbooks and 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 individual's 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?

Please explain: Job coaches are assigned to a group based on their fit with the group's dynamic, and their ability to communicate with all group members in their primary language. Coaching goals for each member in the group are individualized based on their plans and stated goals for success in their current job.

Federal Requirement #5:

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

<u>Guidance:</u>

- 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? $\ oxtimes$ Yes $\ oxtimes$ No

Please explain: Clients are encouraged to voice their preference at any time. Staff also note if behavioral issues might reflect a lack of compatibility within the group, and may contact the service coordinator to discuss a change. This year we've transitioned two group members to individual employment, and in both cases it was based on a client-initiated request.

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:

Federal Requirement #6:

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.

Guidance:

- 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?

Does the service and/or program meet this Please explain:	requirement? □ Yes □ No
Federal Requirement #7: Each individual has privacy in his/her sleeping or living unit: Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors as needed. Individuals sharing units have a choice of roommates in that setting. Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.	 Guidance: 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?
Does the service and/or program meet this Please explain:	requirement? □ Yes □ No

Federal Requirement #8: Individuals have the freedom and support to control their own schedules and activities, and have access to food at any time.	 Guidance: 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?
Does the service and/or program meet this Please explain:	s requirement? □ Yes □ No
Federal Requirement #9: Individuals are able to have visitors of their choosing at any time.	 Guidance: 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?
Does the service and/or program meet this Please explain:	requirement? □ Yes □ No
Federal Requirement #10: The setting is physically accessible to the individual.	 Guidance: 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?
Does the service and/or program meet this Please explain:	s requirement? □ Yes □ No

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

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 backup, 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.
- Using a form from previous years will negatively impact a concept score, so please ensure the current FY 20-21 form is 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 and opportunities.

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 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 a sustainable plan 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 https://www.dds.ca.gov/initiatives/cms-hcbs-regulations/.

Vendor name	The Campbell Center
Vendor number(s)	HD0365
Primary regional center	Frank D. Lanterman Regional Center
Service type(s)	Supported Employment Group
Service code(s)	950
Number of consumers typically and currently served	25 total SEP clients
Typical and current staff-to-consumer ratio	1:3

1. Please provide a brief description of the service/setting. Include what a typical day consists of during regular program as well as how services are currently being provided. This response must include the baseline/current levels for any aspects of the program for which the concept proposes funding.

We currently have 13 clients in the SEP Group program. Currently all are furloughed due to COVID-19, but when active, there are three main workgroups. One group of 4 clients works 3 days a week as a clean-up crew removing litter around the downtown corridor and City Hall for the City of Burbank. Our second crew is a 'mobile crew' of 3 clients providing janitorial services for various local businesses three days a week. Our third crew consists of 6 clients who split a weeklong shift washing squad cars for the Glendale Police Department. All three groups have essentially been together for more 10 years.

The new Administration took the helm in August of 2019. We believe this department has been underperforming in the last year and half. When the new administration was hired at that time, both the previous SEP Director of Employment and the Employment Case Manager had just left. We promoted our strongest job coach to coordinate the department, but that left us short staffed. Additionally, the individual serving as the job developer at the time had not successfully placing any of the 5 clients on her caseload in more than a year's time. She is also no longer with us. These deficiencies are at the root of our request as we are now seeking to rebuild the SEP program and bring it into compliance with HCBS.

As part of this overall organizational transition in the summer of 2019, TCC closed its Work Activity Program, transitioning it to an integrated fulfillment center. Five former WAP clients were provided the opportunity to be hired to work as TCC-employed production workers at minimum wage. While this was documented as their choice at the time, as with the groups, this move has kept those clients engaged in a setting they have been working in for many years and has provided only limited exposure to non-disabled peer coworkers. We believe they also can be successfully transitioned to community-based employment, with the right supports.

Project Narrative Description: While filling out this section, reflect on how services are typically provided and how that might have changed in the past year. Think about what has been learned in the past year and how that might shape services going

forward. Funding awarded through this concept can span the course of up to two years which would allow time to shape services to be more person-centered and align with the HCBS federal requirements.

2. Please provide a brief summary narrative of the concept for which you are requesting funding, including justification for the funding.

Now that we've experienced a natural break in the workflow due to the pandemic, our goal is to address the gap identified in our survey that indicates several of our clients appear unsure if they were offered a choice of employment.

https://docs.google.com/forms/d/1DuLAYWvuqt4SZPXBVoKBiulK VUkfT-dA09okbCcwdU/edit#responses

We are already investing in hiring experienced staff to implement this transition, but are seeking funding for one additional staff enhancement. Just this month, February 2021, we hired a fulltime Job Developer. He is meeting with our longtime group clients and individual staff now working in our fulfillment center to support them in identifying new goals that will lead to greater employment opportunities in the community. In the spirit of the Final Rule, we seek to eliminate all three groups by 2023.

The role of the Job Developer will also support our plan to build new partnerships with warehouses and logistics agencies in the area so that we may transform our fulfillment operation from an agency-run enterprise that provides permanent employment for clients into more of training center focused on short-term skill building that leads to community-based jobs in the industry.

To support his success placing clients and growing the program, we are requesting funding to hire an independent Board Certified Behavior Analyst (BCBA). The BCBA will be contracted as needed to develop client plans that address negative behaviors of our current job development and furloughed clients to improve workforce readiness skills. Since our clients have been in their roles for many years, we believe expert intervention is needed to positively impact client fears, lack of soft skills, and compulsive or undesirable behaviors that have been accepted and enabled within our group settings but would limit their success in a community integrated environment.

3. Identify w	hich F	ICBS 1	federal	requir	ement	ts this	conce	pt addı	resses that are currently out of	
compliance.	Coul	d be a	ll or a	subset	of the	se ide	ntified	as out	t of compliance on the evaluation	on.
1 0	VV	2	4	F	6	7	0	^	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.

#2: Our current SEP program is the last remaining program to be addressed by the new administration in terms of ensuring full HCBS compliance. Our most significant barrier in transitioning SEP group clients into individual employment has been a lack of expertise within our team on how to move beyond the 'status quo' of only providing ongoing coaching of existing groups. We believe that by adding the behavior modification expertise of a BCBA to the workforce development skills and experience of our new job developer we will significantly improve our placement outcomes. Additionally, as behavior modification plans are developed,

the BCBA will provide additional training to job coaches on how to sustain positive behavior interventions so placements are successful long term. Developing this team model will allow us to support the whole person by addressing the dual challenges of job readiness and employment opportunities.

- 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 by March 2023.
- #2: Our workgroups consistent of developmentally disabled workers. Although they interact with community members (business owners, members of the public) they are not working directly with non-disabled peers. By transitioning away from a workgroup structure, adding the expertise of a BCBA, and investing in a job developer who will match client interests with community-based employment opportunities, TCC can build a Supported Employment Program that meets individual job aspirations. Beginning this process in mid-2021 gives us 18 months to hire the consultant and implement plans for the 13 group members and five production workers to complete our transition by 2023.
- 6. What are the proposed outcomes and objectives of the concept, and what are the methods of achieving and tracking them?

Upon funding approval in mid-2021, a BCBA will be contracted to provide up to 80 hours per month of behavioral services, based on client need, through mid-2023.

By the Fall of 2021, the BCBA will have assessed all workgroup clients.

By the end of 2021, the BCBA will have created a behavioral modification plan for all who require one. Plan implementation progress will be tracked to inform the appropriate timing of each placement.

By the end of 2021, the largest workgroup (washing cars at the GPD) will be dismantled and all 6 clients who chose to will be actively engaged in a transition plan to seek an internship or individual, competitive employment.

By the end of 2021, 1-2 of the five production workers at TCC will also be transitioned into a plan to find work in a community setting, to be replaced by new 'trainees.'

Through 2022, the remaining two workgroups will be discontinued and members transitioned to individual work settings. The remaining 3-4 original production workers will also transition, fully completing the project by 2023.

All plans will be informed by Person-Centered Practices. Client goals will be established and progress toward those goals will be charted in the job coach notes.

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.

In addition to the survey that identified the gap between full choice and some clients being unclear about their choice, several clients have expressed a desire to change their work setting. Some of this has been driven by intra-group relationships that don't fit, and some by an

expressed desire to do a different or more independent job. At least two clients have expressed a need for support in changing behaviors they know are hampering their progress.

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

By moving our SEP program to 100% individualized employment, clients will be given the opportunity to better define the type of work and hours worked of their choice. Goals will be all individualized and specific to each client's new job. The expertise added by the BCBA will help our clients overcome longstanding habits and routines that may be limiting their options. For example, we have one individual, KS, who is bright and highly employable, but habitually gets off task to 'recycle' bits of trash throughout the day. Such a behavior needs to be addressed in order for him to successfully retain a job in the community where this habit might not be acceptable to a supervisor. A second client, RC, who is an instructor, is aware of her limitations and has asked for support in improving time management and how to handle conflicts among her own students. Support for these key soft skills will ensure she retains employment that she's very much enjoying. Additionally, many of our SEP clients have barriers that are beyond a job coach or job developer's expertise, and that only a BCBA can effectively address.

9. Please address your plan for maintaining the benefits, value, and success of your project at the conclusion of 2020-21 HCBS Funding.

The addition of behavioral expertise will enhance our support of the whole person and is expected to improve our placement rate. More frequent and effective placements in turn should increase the number of referrals and grow our SEP program. If this model is proven effective after two years the program may scale up to a point where we can hire one or more of our own BCBA's and potentially evolve the service into a vendored program. This would allow us to offer this specialty to a wider span of regional center clients, including clients from other vendors in the FDLRC catchment area.

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). This information can be found at this <u>link</u>.

Category: Personnel

Addition of 1 consultant: Board Certified Behavioral Analyst (BCBA)

Contract not to exceed 80 hours per month x \$48 per hour = \$3,840 per month x 12 months/year = \$46,080

Administrative overhead to cover management and contract procurement costs = 15% of direct services cost = \$6.912

For two-year period, beginning May 2021 and ending June 2023

TOTAL = \$105,984

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

We have secured outside foundation funding in support of our employment objectives in the past but have found this last year that without significant outcomes or program growth, funders have not sustained their support. With improved expertise we fully expect this will become one of our better privately funded programs, based on the general interest among foundations in supporting workforce development for underserved populations overall.

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)2020
Disparity Funding	_x_ No Yes. If Yes, FY(s)
CPP Funding	_x_ No Yes. If Yes, FY(s)
CRDP Funding	_x_No Yes. If Yes, FY(s)
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If yes to any question be sure to answer questions 13 and 14.

For providers who have received prior HCBS, Disparity, CPP or CRDP 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.

(See attached worksheet)

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.

Previous funding was specific to our Community Integration program, which serves a separate set of clients. However, because funds received in 2020 covered the cost of two TCC staff members to become certified 'Person Centered Practices' trainers, that expertise will also benefit the objectives outlined in this current proposal for the SEP program, as in-house PCP trainings and refreshers will now be provided for all staff, including job coaches.

HCBS CONCEPT BUDGET									
endor Name The Campbell Center									
Vendor Number(s)		HD0365							
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		Wage and							
		Benefits	FTE		Annual Cost	FTE	Annual Cos	t	Cost
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Administrative Expenses			_						·
Administration, ongoing staff s	upervision			\$	6,912		\$ 6,912	\$	13,824
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Capital Subtotal				\$			\$ -	\$	-
Total Concept Cost				\$	52,992		\$ 52,992	\$	105,984
rotar concept cost				7	32,332		7 32,332	۲	103,304

See Attachment F for budget details and restrictions