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: February 12, 2021	Completed by: Maria Peralta				
Vendor Name, Address, Contact: Giant Steps Training Programs – 2228 Crenshaw Blvd., Los Angeles, CA 90016					
Vendor Number: PX0207					
Service Type and Code: Community Integration Training Program, 055					

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?

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

Please explain: Individuals are able to receive services in the community. However, due to our current staffing ratio of 1:6 to 1:8 in our Community Integration Training Program (PX0207), we are not able to accommodate the needs and preferences of each individual. We are currently accommodating choices made by a majority of individuals but are unable to meet the plan for services for all individuals.

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? ☐ Yes ☒ No

Please explain: The most current IPP is required as part of the admission and intake process. The program provides an Individual Service Plan annually to update service needs. However, lack of Person Centered Planning Coordinator(s) does not allow the program to be able to conduct person-centered assessments and 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? \Box Yes \boxtimes No

Please explain: Some of the clients we serve are non-verbal and some have hearing impairments that make it difficult to communicate and educate on their rights to privacy, dignity, respect and freedom from coercion and restraint. Staff are not trained in sign language and assistive technology such as communication tablets and devices are not available.

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?

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

Please explain: The program is able to offer activities as outlined in the individuals IPP goals. The challenge lies in the programs inability to provide these services on a daily basis due to having to accommodate other clients' needs within the 1:6 to 1:8 group ratio.

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: The program does not meet this requirement currently. Some clients prefer staff who speak Spanish and although bi-lingual Spanish staff are available, it is limited. Within the ratio of 1:6 to 1:8, there is typically an individual who's primary language is Spanish and may not be with a staff who is fluent in the language. It is not cost effective for the program to commute from different areas of Greater Los Angeles in 15-passenger vehicles to try to accommodate those who wish to have a bi-lingual Spanish trainer. Doing so would result in clients spending a lot of time commuting and having less time to do their activities.

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?

Please explain: N/A	
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: N/A	requirement? 🗆 Yes 🗆 No

Does the service and/or program meet this requirement? \Box Yes \Box 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: N/A	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: N/A	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: N/A	requirement? □ Yes □ No

CONTACT INFORMATION

Contact Name: Maria Peralta

Contact Phone Number: (213) 204-1000 ext. 201

Email Address: mariap@giantsteps.net

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.

⊠ IAGREE

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	Giant Steps Training Programs, Inc.
Vendor number(s)	PX0207
Primary regional center	South Central Los Angeles Regional Center
Service type(s)	Community Integration Day Program
Service code(s)	055
Number of consumers typically and currently served	130 consumers
Typical and current staff-to-consumer ratio	1:6 to 1:8

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.

Giant Steps Community Integration Day Program is a community based program currently authorized to provide services to 130 individuals from South Central Los Angeles Regional Center, Westside Regional Center and Frank D. Lanterman Regional Center. The current staff to client ratio is 1:6 to 1:8. The program has an additional transportation component. Participants are either picked up by other vendored transportation services, our internal transportation service or are able to independently arrive and depart from the program using public transportation. Participants who utilize the program transportation component are typically picked up around 8:00 AM - 9:00 AM and are then taken to the community for their scheduled activities. They are then transported back to their residence around 3:00 PM – 4:00 PM. The transportation vans are 12 – 15 passenger vehicles that can accommodate the 1:6 to 1:8 staff to client ratio comfortably. The routes are distributed by geographic areas to limit the time the participant spends on a one-way trip to no more than the maximum 90 minutes allowed per contract. Activities typically include exercises at a local gym (24-Hour Fitness or Planet Fitness), learning to use public transportation, grocery shopping, learning about local resources, taking college courses at Santa Monica College and volunteering at local businesses. Others participate in learning vocational skills by working at the Giant Steps Store & More, Salvage Society junk removal services and Snack Attack vending services.

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.

We are seeking funding in 3 areas. The first area is hiring 1 Full-Time Person Centered Planning Coordinator and a Communications Support staff. In addition, training is needed for current case managers to become certified in Person Centered Planning.

These individuals are key to providing Person Centered services to the individuals we support. Each Person Centered Planning Coordinator will be assigned to produce comprehensive Person Centered Plans and will set up meetings with the individual as well as follow up meetings to ensure that the client is able to fully participate in the decisions that are made and choices about their services and how to best meet their goals. The Communications Support staff will be able to assist those who have are non-verbal and/or hearing impaired so that they can participate in their Person Centered Plan.

The second area of funding requested is for assistive devices needed to assist the Communications Support staff in training those who have difficulties communicating, training current staff is properly using the devices and having the devices available during community outings.

The third area of funding requested is for 4 minivans to allow a 1:4 staffing to client ratio for those who are needing staff who are bi-lingual Spanish and to customize the outings so that clients are able to have a choice in their outings more frequently while still being able to be cost effective for the program. This will also allow greater geographic coverage when picking up clients so that those who prefer activities that differ from others who live in their area, are able to go to their chosen activities.

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 X 3 X 4 X 5 X 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.

Individuals are able to receive services in the community. However, due to our current staffing ratio of 1:6 to 1:8 in our Community Integration Training Program (PX0207), we are not able to accommodate the needs and preferences of each individual. We are currently accommodating choices made by a majority of individuals but are unable to meet the plan for services for all individuals.

The most current IPP is required as part of the admission and intake process. The program provides an Individual Service Plan annually to update service needs. However, lack of Person Centered Planning Coordinator(s) does not allow the program to be able to conduct person-centered assessments and plans.

Some of the clients we serve are non-verbal and some have hearing impairments that make it difficult to communicate and educate on their rights to privacy, dignity, respect and freedom from coercion and restraint. Staff are not trained in sign language and assistive technology such as communication tablets and devices are not available.

The program is able to offer activities as outlined in the individuals IPP goals. The challenge lies in the programs inability to provide these services on a daily basis due to having to accommodate other clients' needs within the 1:6 to 1:8 group ratio.

Many of our clients prefer staff who speak Spanish and although bi-lingual Spanish staff are available, it is limited. Within the ratio of 1:6 to 1:8, there is typically an individual who's primary language is Spanish and may not be with a staff who is fluent in the language. It is not cost effective for the program to pick up clients from different areas of Greater Los Angeles in 15-passenger vehicles to try to accommodate those who wish to have a bi-lingual Spanish trainer.

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.

Requirement #1: The addition of 1 Person Centered Planning Coordinator and training for 2 current staff members to become Person Centered Planning Coordinators in order to provide Person Centered Plans for the program participants would ensure that all individuals are able to make choices in their daily activities as required. Each Coordinator will be able to develop customized Person Centered Plans for all participants by March 2023.

Requirement #2: The setting options will be identified and documented in the personcentered service plan created by the Person Centered Planning Coordinators and are based on the individual's needs and preferences.

Requirement #3: Funding for a Communications Support staff to assist participants and to be able to train staff in the use of assistive technology to better understand those who are non-verbal or have minimum communication skills allows the program to be able to inform and educate participants about their rights of privacy, dignity and respect, and freedom from coercion and restraint in a manner that they will be able to understand.

Requirement #4: Funding for minivans will allow smaller groups to be able to accommodate individual choices for their daily activities.

Requirement #5: Funding for minivans will allow a group to be able to travel further within the 90-minute travel time in order to provide a more customized group of participants who need staff who are able to communicate in their primary language.

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

Each Person Centered Planning Coordinator will produce 2 Person Centered Plans per month. By having 3 Coordinators, they will be able to complete 72 Person Centered Plans during the 1st year and 144 Person Centered Plans by the 2nd year.

All participants who have difficulties with communication will be evaluated to determine the best assistive devices and communication system that will allow them to express their needs and choices to the best extent possible. Their current communication baseline will be documented and progress updated semi-annually.

Transportation routes will be customized to allow participants the ability to be part of a group that will meet their choice of activities and preferred staff in order to communicate in their primary language and meet their goals. Activities of the clients will be documented and baselines established to ensure that they are able to participate in their chosen activities outlined in their Person Centered Plan.

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 in						
responded said that they while participating in the pIPP meetings and commuto be moved to a more cu	sed on the results of our annual Program Performance Evaluation, 40% of those who ponded said that they were unsatisfied with the lack of choices they were offered ile participating in the program due to the number of clients served per group. During meetings and communication with the client and their circle of support, the request be moved to a more customized group is often not fulfilled due to the limitations in the asportation available for their geographical location.					
8. Please describe how the centered services to your cli	concept you propose will enable you to provide more personents.					
	ned proposal results in developing Person Centered Plans for se services can be provided.					
9. Please address your plan the conclusion of 2020-21 H	for maintaining the benefits, value, and success of your project at CBS Funding.					
2 staff who were trained in P Staff will also be trained by t	ling, all participants will have updated Person Centered Plans. The Person Centered Planning shall continue maintaining those plans. The Person Centered Planning shall continue maintaining those plans. The Communications Support staff in using the assistive devices nunication difficulties. Minivans shall be maintained as needed to client ratios.					
the budget template at the endition available. When applicable, consultants or training, admit more than 2 years). If project by phase/year. Administrative costs, if any, respectively.	low explaining each major cost category and timeline. Complete and of the concept sheet. An excel version with formulas is budgets should include personnel/benefits, operating costs such as inistrative expenses/indirect costs, and capital costs (assets lasting at spans 2 years or occurs in phases, budget should be separated must comply with DDS' vendor requirements, including a cap of //benefits, consulting, and operating costs (must exclude capital be found at this link.					
funding past the timeframe of	bility of funding sources for all programs or concepts requiring any f the requested funding, especially those that involve staff or other k "not applicable" if costs will all be incurred during the program					
	able as the timeline for the positions will expire in 2 years. The ng ongoing funds from transportation vendored services.					
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 Yes. If Yes, FY(s)					

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.

CPP funds were received for an Adult Residential Facility for clients transitioning from the closure of Lanterman Developmental Center in 2012. The ARF continues to be active.

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.

CPP funds were used for Residential services and unrelated to the Community Integration Program.

HGBS CONCEPT BUDGET								
	Giant Steps Training F	rograms						
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Total Concept Cost	STATE OF STATE OF	\$	254,452		\$	99,952	\$	354,404

See Attachment F for budget details and restrictions