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 hcbs.regs@dds.ca.gov.

Date(s) of Evaluation: February 12, 2021	Completed by: Lania Glaude, Executive Director
Vendor Name, Address, Contact: Family, A Park East, Suite 512, Los Angeles, CA 900	
Vendor Number: PW7204, PW5976, PL1497	
Service Type and Code: 055, 063	

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.

<u>Guidance:</u>

- 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? ☐ Yes X No Please explain: FACT's day program, Generating All Possibilities (GAP) provides community-integrated support to individuals who have aspirations of or who are attending college or university. Support services are provided primarily on college campuses. We currently support 113 students through this program. Services are provided as indicated in clients' IPP's, on a 1:3 basis and other

community outings are discussed and decided collectively by the clients. GAP and Clients turn to FACT for employment services when they graduate from college or choose to postpone their education.

FACT also provides employment support through our **Tailored Day Services Program (TS)** on a 1:1 basis. FACT currently has 103 TS clients. Clients are referred to appropriate community agencies and resources and pre-employment and post-employment support are provided as needed.

Six months prior to the pandemic, FACT was vendored by the Regional Center (RC) to provide **Community Integrated Employment Services (CIE)** via the CIE Incentive. Due to Covid-19 and financial limitations, the commencement of our services has been delayed. Nonetheless, FACT continues to receive many requests for employment support service. We are unable to adequately respond to those requests, through the CIE incentive, due to staffing limitations. Clients are choosing FACT to assist them in obtaining employment, yet we are limited in the services we can provide at this time.

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

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 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. options that were considered prior to selecting this setting?

Does the service and/or program meet this requirement? X Yes \square No

Please explain: We are a community integrated day program that provides various setting options for clients on a daily basis. We have an IPP for each client and the primary college campus setting is a non-disability specific setting. We are currently training our trainers, who will in turn, train our staff in person centered thinking and planning. Our goal is to train our entire staff.

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 76

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 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? $\,$ X Yes $\,$ \square No

Please explain: FACT maintains client notes in a controlled electronic HIPAA compliant system. Privacy is maintained and FACT has strict company rules addressing privacy and proper handling of client information. Clients are given both written and oral notification of their rights upon intake, at annual meetings and in informal settings on an ongoing basis.

Federal Requirement #4:

Optimizes but does not regiment individual initiative, autonomy, and independence in making life choices, including, but not limited to, daily

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

activities, physical environment, and with whom to interact.

- 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 who will assist clients in moving from the identified goals/outcomes outlined in the IPP or PCP to determining which opportunity brings them closest to their desired short and/or long-term career goals.interest them and correspond with their IPP goals?

Does the service and/or program meet this requirement? X Yes $\ \square$ No

Please explain: The GAP program allows clients to participate in daily activities of their choice as identified in their IPP and daily for other community outings. The tailored services program provides support based on the client's IPP goals. Both programs allow clients to interact with individuals they choose.

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? X Yes □ No

Please explain: Clients are carefully matched with available staff when possible. New staff is hired if a match is not currently employed at FACT. Clients may refuse service or request changes of any Direct Support Professional at any time. Clients may voice their concerns to their Direct Support Professional, the DSP's direct supervisor, the Director of Adult services, the Executive Director of FACT and Case Managers.

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

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?

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. Does the service and/or program meet Please explain: Click or tap here to enter	-
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. Does the service and/or program meet Please explain: Click or tap here to enter	-
	0 : 1
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 requirement? ☐ Yes ☐ No
Please explain: Click or tap here to enter	text.

 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?
this requirement? □ Yes □ No
<u>text.</u>
 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?
this requirement? ☐ Yes ☐ No text.

CONTACT INFORMATION

Contact Name:

Contact Phone Number:

Email Address:

Lania Glaude

(310) 475 – 9620 Ext 229

Lania.Glaude@factfamily.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.

X 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	Family, Adult and Child Therapies (FACT)
Vendor number(s)	PW7204, PW5976, PL1497
Primary regional center	Westside Regional Center
Service type(s)	Community Integration Training, Community Activity Support Services
Service code(s)	055, 063
Number of consumers typically and currently served	215
Typical and current staff- to-consumer ratio	1:3, 1:2 & 1:1

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.

FACT's traditional programs provide in-home and community integrated support services that address self-advocacy, social skills, budgeting management, work skills training, volunteerism, public outings, theater arts, art, employment, career development, etc. FACT provides in-home support services through FACT's Supported Living Services (SLS) program. FACT's **Generating All Possibilities** (**GAP**) program provides support services to people with developmental disabilities who either attend or want to attend college or university. Services are provided on a 1:3 basis. We are currently servicing approximately 113 GAP clients. Our GAP clients seek employment after graduation, or upon determining that they would rather work prior to completing their education. In both instances, FACT provides employment services through our Tailored Day Services program.

Tailored Day Services (TS) provides employment support on a 1:1 basis. We have approximately 102 clients receiving services. At one time, employment services included placing individuals in community businesses and providing other preparatory and on the job support services. Due to current staff limitations, support provided under Tailored Day Services is primarily limited to pre-employment job preparation.

On **September 19, 2019**, FACT was officially notified that we were vendored to provide **Competitive Integrated Employment (CIE)** services. Due to Covid-19 and the financial demands of properly staffing the program, the commencement of our services has been delayed. We receive a large number of requests for employment support services, but are unable to adequately respond to those requests due to staffing limitations.

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 to increase community-based **CIE** opportunities for adults with developmental disabilities. Our approach is person-centered and we start and end with the client's preferences of the type of employment opportunities they choose to pursue. While the pandemic has provided opportunities in certain frontline positions, many of our

clients are unwilling to accept menial job positions that are limited to odd hours. We have discovered that significant time and effort must be dedicated to establishing contacts and relationships with community employers who are willing to hire within our population for both blue-collar and white-collar positions. FACT will offer its services to current clients and to other community members.

We are requesting funding for 2 FTE **Job Developers (JD's)** who will establish contacts and develop relationships and job opportunities with community employers, and 1FTE **Life Planner** who will assist clients in focusing critical time and energy on identifying and selecting, from amongst available job opportunities, the most appropriate jobs that match their short and long-term career goals as defined in their IPP or PCP. In addition, we are requesting funding for 4 FTE **Job Coaches** to provide post-employment services to support clients in maintaining their new jobs and managing their long-term career goals. We will also need funding to provide **ACRES** training to our JD's, JC's and LP. Funding for six computers and for additional facilities is also requested.

Upon receiving an award, FACT will **immediately recruit** 2 FTE **Job Developers** (**JD's**), 1 FTE **Life Planner** (**LP**), and 4 FTE **Job Coaches** (**JC's**) who will all report directly to the Regional Manager. The Regional Manager reports to the Director of Adult Services, who in turn, reports to the Executive Director of FACT. The LP and the JD's will share information about current employment needs and availability of job opportunities. Additional space and computers are needed to provide both pre and post employment support.

Once clients' job needs are identified, FACT's JD's will leverage its existing relationships with employers to determine if those needs can be met through current contacts. If an appropriate opportunity is not available, FACT's JD's will seek to establish opportunities for FACT's clients directly by finding community employers via research, referrals, job boards and other agencies to establish relevant opportunities for FACT's clients. Both JD's and LP's can identify new types of job opportunities like "Zoom Room Facilitator," created as companies move from in-person to on-line service options.

FACT will establish baseline performance standards and goal measurements. FACT will also **track client progress** on a 30 day, 60 day, 90 day and semiannual basis, through a tracking sheet that establishes both **qualitative** and **quantitative measures of progress**. In addition, FACT will **track participant satisfaction via surveys** taken from clients, families, employers and Regional Centers.

Having these professionals focus their time on specific task allows greater interaction with the community which should translate into more job opportunities. In addition, it will allow services to be highly specialized to the individual client's needs. Finally, it will allow staff to provide quality person-centered services to more clients.

•				•			•		that are currently out of
compliance.	Could	be all	or a sub	set of	those i	dentifie	d as ou	ut of co	mpliance on the evaluation.
1 <u>X</u>	2	3	4	5	6	7	88	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.

The barriers to compliance are funding for specific positions, facilities and equipment that will support clients' efforts in fully participating in competitive integrated employment processes

Job Developers are essential to adequately address the goals of the CIE program. The JD's mission is to seek out specific job opportunities for our clients. The support provided by the Life Planner assists the Job Developer by working with the client to further define the appropriateness of available positions based on the client's IPP, PCP and client information. Once the employment opportunity is identified and selected, the Job Coach is needed to assist the client in preparing for the interview, onboarding for the position, post-employment support and career support.

These trained professionals focus their time on specific tasks. In doing so, highly specialized services are tailored to the client's needs. The time these professionals save, increases the opportunity for employer interactions, which should translate into more job opportunities and the ability to provide person-centered services to more clients.

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.

Federal requirement #1 will be addressed by facilitating current clients' inclusion in community integrated employment and by facilitating their ability to access jobs opportunities to the same degree as those who are not receiving Medicaid HCBS. Receiving this service and thereby gaining employment will allow clients to have greater control over their personal finances.

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

Our proposed outcome is to increase employment opportunities in competitive integrated employment settings through our CIE incentive for our GAP, TS and SLS clients; and for those who are participating in self-determination and the community at large.

FACT will **track client progress** on a 30 day, 60 day, 90 day and semiannual basis, through a tracking sheet that establishes both **qualitative** and **quantitative measures**. In addition, FACT will **track participant satisfaction via surveys** taken from clients, families, employers and Regional Centers.

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 that steps were taken to identify the interests and desires of the individuals and who was involved in that process.

To identify clients' interest and desires in developing this concept, FACT used a combination of information extracted from IPP's, Person Centered Plans (PCP), Individual request, assessments, discussions with Managers, conversations with Direct Support Professionals (DSP's) and Client Case Managers.

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

Job Developers will focus on identifying and establishing job opportunities that are specific to the needs of our clients, as identified by the IPP, PCP and discussions with the Life Planner.

Life Planners will assist clients in focusing critical time and energy on identifying and selecting, from amongst available job opportunities, the most appropriate jobs that match their short and long-term career goals. This will accelerate the process of identifying the correct opportunity as defined by the individual. This acceleration will allow staff the time to support more clients in reaching their desired outcomes. The joint communication between the JD's and LP's ensure that the services provided are specific to the individuals' needs and that they are performed efficiently.

The **Job Coaches** will work directly with clients on establishing interview skills and other preparatory measures for securing employment. In addition, when requested, the JC will act as an intermediary between the client and the employer and assist the client in resolving any barriers to maintaining their employment position.

These trained professionals focus their time on specific tasks. In doing so, highly specialized services are tailored to the client's needs. The time these professionals save, increases the opportunity for employer interactions, which should translate into more job opportunities and the ability to provide personcentered services to more clients.

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

At the conclusion of the HCBS Funding, FACT will maintain the benefits and value of its services by continuing to promote our specialized services through social media and by capitalizing on relationships established through our employer partnerships. Through operating experience, FACT will establish and document procedures that will assist in operations long after the funding period ends. FACT will also continue seeking grants and community support for our programs.

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 link.

FACT is officially vendored to provide Competitive Integrated Employment (CIE) services. The following is needed annually to staff CIE: 2 Job Developers @ \$72,240 each; 4 Job Coaches @ \$49,360 each; and 1 Life Planner @ \$65,376 each. All wages are Full Time Equivalent and include benefits. This is itemized on the spreadsheet in the "Personnel (wage + benefits)" section. The budget is the same for both Year 1 and Year 2.

FACT will need to add additional meeting spaces/offices for participant meetings. This will increase facility costs (rents) by \$2,000 per month (\$24,000 per year). All employees in the CIE program will need ACRE training totaling \$4,200 (7 employees @ \$600 per employee). Facility and ACRE training are itemized on the spreadsheet in the "Operating expenses" section. Facility costs are for both Year 1 and Year 2. Training is budgeted for Year 1 only.

FACT will need to purchase six (6) additional computers for new staff @ \$900 each (\$5,400 total). This is itemized on the spreadsheet in the "Capital expenses" section. This is budgeted for Year 1 only.

Year 1 budget includes all of the above discussed items and totals \$440,896. The Year 2 budget only includes wages and facility costs and totals \$431,296.

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.

At the conclusion of the HCBS Funding, FACT will also continue to seek grants and community support for this program.

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)		
Disparity Funding	<u>X</u> No Yes.	
If Yes, FY(s)		
CPP Funding	<u>X</u> No Yes.	
If Yes, FY(s)		
CRDP Funding	<u>X</u> No Yes.	
If Yes, FY(s)		
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For providers who have received prior HCBS, Disparity, CPP or CRDP Funding from DDS

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

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.

During the 2019-2020 fiscal year, FACT received \$25,000 in HCBS Funding. Proceeds of this grant are funding a Person-Centered Thinking/Planning train the trainers program. FACT has enrolled three key people in the Helen Sanderson Associates USA, LLC program. As of February 12, 2021, the employees have completed one part out of a three-part training 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 funding was for Person Centered Thinking/Planning train the trainer courses. FACT is not requesting funds for Person Centered Thinking/Planning training. The current request is for staffing, ACRES training, computers and facilities.

HCBS CONCEPT BUDGET	
Vendor Name	Focus on All Child Therapies, Inc
Vendor Number(s)	PL1497 / PW5976 / PW7204

	,	Year 2 Budget				Total			
	Year 1 Budget Wage and								
	Benefits	FTE		Annual Cost	FTE		Annual Cost		Cost
Personnel (wage + benefits)									
Job Developer	72240	2.00	\$	144,480	2.00	\$	144,480	\$	288,960
Life Planner	65376	1.00	\$	65,376	1.00	\$	65,376	\$	130,752
Job Coach	49360	4.00	\$	197,440	4.00	\$	197,440	\$	394,880
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
Personnel Subtotal			\$	407,296		\$	407,296	\$	814,592
Operating expenses									
Facility Costs			\$	24,000		\$	24,000	\$	48,000
ACRE Training (7 @ \$600 each)			\$	4,200				\$	4,200
								\$	-
								\$	-
								\$	-
								\$	-
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Operating Subtotal			\$	28,200		\$	24,000	\$	52,200
Administrative Expenses									
								\$	-
								\$	-
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Administrative Subtotal			\$	-		\$		\$	
Capital expenses			<u> </u>			_		Ť	
Computers (6 @ \$900 each)			\$	5,400				\$	5,400
			Ť	5,400				\$	-
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Capital Subtotal			\$	5,400		\$		\$	5,400
•			\$	440,896		\$	431,296	•	872,192
Total Concept Cost			Ş	440,896		Þ	431,296	\$	8/2,192

See Attachment F for budget details and restrictions