

This document was developed in consultation with the HCBS PIHP leads. The purpose of this document is to provide guidance and promote consistency in the Corrective Action Planning process. CAPs are individualized to the person/setting and the PIHP leads may require additional information or compliance activities based upon individual factors.

RESIDENTIAL NON COMPLIANCE BY QUESTION HAB SURVEY		
Question #	Question:	Acceptable CAP:
16	Does each individual have a lease for the residential setting?	16. Use of RCA summary of resident rights
17	Does the lease explain how an eviction happens and what to do?	17. Could ask licensee to add an addendum related to eviction or wait until new RCA is out with the hearing rights information.
34	If the individual lives with other people, did the individual pick their housemates?	34. CMH/ provider has policies around choosing their home, orientation packet that includes information related to choice in housing. Protocol from provider agencies include in plan of service or preplan documents, if CMH is to add to IPOS request date when IPOS will be completed and review it.
11	Can people with different types of disabilities and individuals without disabilities live in the home?	11. The provider/CMH will be trying to show that despite living with only other folks with disabilities there is significant contact with the larger community. This is will be done through daily activity sheets, weekly planning meeting documents, if a goal in IPOS then need to confirm that individuals are actually getting out into the community. Review of progress notes or contact sheets.
28	Do individuals pick the direct support workers (direct care workers) who provide their services and supports?	28. PCP planning and policy procedure, include the residents in the interview process for direct care workers, use of satisfaction surveys, provide policy of steps if an individual prefers not to work with a specific staff member, complain process including the ability to make a confidential complaint.
163	Does the residence offer a continuum of care?	163. Evidence of what services are actually being billed by provider or in the home, evidence that other services are being provided in the community. Attending church, salon, etc in community.
69	Can individuals choose to come and go from the home when they want?	69. Daily calendars, schedules of individuals, staffing levels available to assist individuals with access to the community. Licensing requires that settings have a resident's care agreement that identifies the individual's ability to move about in the community.

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Question #	Question:	Acceptable CAP:
38	Can individuals close and lock their bedroom door?	38. Proof that lock has been installed on individual's bedroom door, such as attestation from supports coordinator, PCP for modification. Policies and procedures for access to keys to the resident's doors, master keys, back up keys etc.
37	If the individual lives with other people, did the individual pick their roommate(s)?	37. Orientation, interview activities prior to moving in, CMH policies, and protocols re how individual choose their setting.
41	Can individuals close and lock their bathroom door?	41. Site review to verify , SC attestation
27	Do individuals pick the agency who provides their residential services and supports?	27. Documentation regarding other settings considered, immediate compliance- progress notes from SC about conversation with individuals. Case manager note Ongoing; Survey with improved records of individual's being interviewed for the survey.
22	Do individuals have access to their personal funds?	22. Policy and process for allowing individuals access on demand. Interview individual.
14	Does the residence allow friends and family to visit without rules on hours or times?	14. Policies, restrictions are removed- evidence of this.
33	Did the individual choose to live at this residential setting?	33. CMH/ provider has policies around choosing their home, orientation packet that includes information related to choice in housing . Protocol from provider agencies include in plan of service or preplan documents, if CMH is to add to IPOS request date when IPOS will be completed and review it.

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Question #	Question:	Acceptable CAP:
61	Can individuals access the laundry area at any time?	61. Evidence of policies and procedures that address individualized access to laundry as desired.
73.	Is the home free of gates, locked doors, or other ways to block individuals from entering or exiting certain areas of their home?	73. Removal or barriers, with verification , attestation of SC. Policies that prohibit the use of gates, barriers etc.
60	Do individuals have full access to the laundry area?	Attestation that there is no lock on doors and that there is access to the room by SC. Policies in the setting that require access for residents.
32	Did the individual have choices of where to live?	32. Documentation regarding other settings considered, immediate compliance- progress notes from SC about conversation with individuals. Case manager note. Ongoing; Survey with improved records of individual's being interviewed for the survey.
70	Can individuals move inside and outside the home when they want?	
55	Do individuals (with or without supports) arrange and control their personal schedule of daily appointments and activities (e.g. personal care, events, etc.)?	Prove that policy and practice is in place that allows choice in their daily schedule. If person is unable to voice this, then they are consulting with their SC and it is included in their IPOS. An active schedule is being used.
47	Do individuals have access to food at any time?	Evidence that there are no locks (attestation, SC or direct observation) on doors and that there is food available. There is a policy that individuals are allowed to eat as they choose.
57	Can individuals access the kitchen at any time?	Evidence of the assessment if restriction is present-Policy that there is an accessible kitchen, eyes on the behavior treatment plans for those with restrictions.
56	Do individuals have full access to the kitchen?	Evidence of the assessment if restriction is present-Policy that there is an accessible kitchen, eyes on the behavior treatment plans for those with restrictions.

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Question #	Question:	Acceptable CAP:
18	Have individuals been provided with information on how to request new housing?	Documentation in their annual paperwork. Pre-plan documentation supporting other housing options.
66	Has the individual agreed to the rules for accessing common areas in the home in the individual's Person Centered Plan?	If there is a restriction, it would need to be documented in the IPOS. Policy addressing rules for instance 'uninhabitable space'.
44	Can individuals choose what they eat?	Policy that addresses that individuals should have menu planning available.
19	Is information about filing a complaint posted in a way the individual can understand and use?	Easy Accessible
29	Can individuals change their services and supports as they wish?	PCP, pre planning, specific list of providers that were given.
53	Is the inside of the residence free from cameras, visual monitors, or audio monitors?	As long as it's not being recorded and is in public space. Also, needs to be in Plan.
30	Are individuals allowed to participate in legal activities, for example voting in public elections if they are 18 years or older, drinking alcohol if they are 21 years or older?	Access to the community. A policy that allows people into the community during times of voting. Make individualized and if there is restriction it would need to involve BTRC/IPOS. Weapons: legacy- if it's in policy its ok to restrict. If it's a new policy and make sure all agree it's acceptable. Or handle on individual basis.
48	Have individuals agreed to the rules on food access in their Person Centered Plans?	Looking at the plan. Policy in the home that they choose when and where to eat.
50	Do individuals have access to a communication device?	Attestation, policy.
21	Do the staff talk about individuals' personal issues in private?	Privacy training, policy, employee handbook. HIPPA training.

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Question #	Question:	Acceptable CAP:
45	Have individuals agreed to the rules on food in their Person Centered Plan?	
78	Do the staff talk about individuals' personal issues in private?	
71.	Is the home physically accessible to all individuals? For example does the home have grab bars, shower chairs, or wheelchair ramps if needed?	Attestation from CMHSP, eyes on.
75	Is accessible transportation available for individuals to make trips to the community?	Policy Local transportation systems imported into their IPOS Daily activity logs
76	If public transit is limited or unavailable, do individuals have another way to access the community?	Policy Local transportation systems imported into their IPOS Daily activity logs
43	Questions with 38 or less non-compliant responses Do staff ask before entering individuals' living areas (bedroom, bathroom)? 38	Privacy training, policy, employee handbook. HIPPA training. Direct observation.
49	Can individuals choose what clothes to wear? 31	Policy, staff training.
51	Can the individual use the communication device in a private place? 29	Privacy training, policy, employee handbook. HIPPA training. Direct observation.
65	Can individuals access the bathroom at any time? 28	Privacy training, policy, employee handbook. HIPPA training. Direct observation.
64	Do individuals have full access to the bathroom? 27	Restriction should be documented in IPOS.
58	Do individuals have full access to the dining area? 23	Restriction should be documented in IPOS.

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Question #	Question:	Acceptable CAP:
13	Do individuals live and/or receive services and supports in a setting where there is regular (more than once per week) opportunity for contact with people not receiving services (e.g. visitors who are friends, family members, others in the larger neighborhood or community)? 21	Weekly planning meetings Daily log
59	Can individuals access the dining areas at any time? 20	Restriction should be documented in IPOS.
68	Is there space within the home for individuals to meet with visitors and have private conversations? 16	

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NON-RESIDENTIAL NON COMPLIANCE BY QUESTION HAB SURVEY		
Question Number	Question	Acceptable CAP response
5	Did the individual pick the agency who provides their non-residential services and supports?	Documentation regarding other settings considered, immediate compliance- progress notes from SC about conversation with individuals. Case manager note Ongoing; Survey with improved records of individual's being interviewed for the survey.
7	Where is this service provided?	Show interaction with broader community.
8.	Are the services for this non- residential provider located outside of the same building, off the grounds of, and disconnected from a hospital, nursing home, Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IID), or Institute for Mental Disease (IMD)?	The provider/ CMH will be trying to show that despite working with only other folks with disabilities there is significant contact with the larger community. This is will be done through daily activity sheets, weekly planning meeting documents, if a goal in IPOS then need to confirm that individuals are actually getting out into the community. Review of progress notes or contact sheets.
9	Is this paid or unpaid work?	Evidence of payment/paycheck
10	Do individuals have access to their personal funds?	Policy and process for allowing individuals access on demand. Interview individual.
12	Does the employment setting allow individuals schedule their work hours or days similar to their co-workers who do not have disabilities?	Policy and process for allowing individuals to develop their own schedules consistent with others in the setting without disabilities.. Interview individual
13	Does the employment setting allow individuals to schedule their breaks and/or lunch times similar to your co- workers who do not have disabilities?	Policy and process for allowing individuals to develop their own schedules consistent with others in the setting without disabilities.. Interview individual

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Question #	Question:	Acceptable CAP:
15	Do individuals perform tasks similar to co-workers who do not have disabilities?	<i>Policy and process for allowing individuals to have input into the tasks they perform consistent with others in the setting without disabilities. Interview individual</i>
16	When providing non- residential supports, do individuals interact with others who do not have disabilities?	<i>The provider/ CMH will be trying to show that despite living with only other folks with disabilities there is significant contact with the larger community. This is will be done through daily activity sheets, weekly planning meeting documents, if a goal in IPOS then need to confirm that individuals are actually getting out into the community. Review of progress notes or contact sheets.</i>
17	When providing non- residential supports, do individuals contact or connect with individuals from the community/public?	<i>The provider/ CMH will be trying to show that despite living with only other folks with disabilities there is significant contact with the larger community. This is will be done through daily activity sheets, weekly planning meeting documents, if a goal in IPOS then need to confirm that individuals are actually getting out into the community. Review of progress notes or contact sheets.</i>
18 (3)	Do individuals who need personal assistance at work receive this support in a private, appropriate place?	<i>Policies, training, interview participant</i>
19	Can individuals schedule their volunteer hours or days similar to other volunteers who do not have disabilities?	<i>Policy and process for allowing individuals to develop their own schedules consistent with others in the setting without disabilities.. Interview individual</i>
20	Can individuals schedule their breaks and or lunch times similar to other volunteers who do not have disabilities?	<i>Policy and process for allowing individuals to develop their own schedules consistent with others in the setting without disabilities.. Interview individual</i>
21 (8)	Do individuals do tasks similar to other volunteers who do not have disabilities?	<i>Policy and process for allowing individuals to have input into the tasks they perform consistent with others in the setting without disabilities.. Interview individual</i>
25	Is accessible transportation available for individuals to make trips to the community?	Policy Local transportation systems imported into their IPOS Daily activity logs
26	If public transit is limited or unavailable, do individuals have another way to access the community?	Policy Local transportation systems imported into their IPOS Daily activity logs

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Question #	Question:	Acceptable CAP:
27	Can individuals move around the non-residential setting, as appropriate and to the same extent that individuals who do not have disabilities?	<i>Removal of barriers, with verification , attestation of SC. Policies that prohibit the use of gates, barriers etc.</i>
28 (3)	Is the non-residential setting physically accessible to all individuals? For example does the home have grab bars, wheelchair ramps if needed?	<i>Removal of barriers, with verification , attestation of SC. Policies that prohibit the use of gates, barriers etc.</i>
31	Are provider policies outlining the individual’s rights, protections, and expectations of services and supports provided to the individual in an understandable format?	<i>Evidence of policies and procedures that outline rights, protections, and expectations of services and supports</i>
32	Have individuals been provided with information on how to request a new non- residential setting?	<i>CMH/ provider has policies around choosing their supports, orientation packet that includes information related to choice in employer/ day program. Protocol from provider agencies include in plan of service or preplan documents</i>
58	Can individuals schedule their hours and days at the day program?	<i>Policy and process for allowing individuals to develop their own schedules consistent with others in the setting without disabilities.. Interview individual</i>
59	Can individuals schedule their breaks and/or lunch times at the day program?	<i>Policy and process for allowing individuals to develop their own schedules consistent with others in the setting without disabilities.. Interview individual</i>
60 (4)	If individuals need personal assistance while attending their day program do they receive it in a private, appropriate place?	<i>Policies, training, interview participant</i>
63	Do individuals have control over their personal funds?	<i>Policy and process of payment if a work place</i>