

Name of Setting: Cornerstone

SOA: Grant Blackford Mental Health Center

Address: ~~50550 Oak Creek~~ IN 46952

Type of Setting: Provider Owned, Controlled, or Operated (POCO) Non-Residential Setting

HS Category: Prong 1; the setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment.

Brief Description of Setting: The setting is an Outpatient Setting.

Public Comment/State Response: There were no public comments from the public posting.

Support Submitted by the State to Demonstrate Setting Progress in Overcoming the

Institutional Presumption Status by DMHA: DMHA will show that Cornerstone (1) overcomes the presumption of institutionalism, and (2) is fully compliant with the Centers for Medicare and Medicaid Services (CMS) HCBS Settings Final Rule. Based on this evidence, DMHA concludes that CMS should find Cornerstone is a community-based setting, and is therefore an eligible setting for delivery of HCBS.

Evidence of overcoming institutional status:

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.

- The setting affords opportunities for individual schedules that focus on the needs and desires of an individual and an opportunity for individual growth.
- The setting affords opportunities for individuals to have knowledge of or access to information regarding age-appropriate activities including competitive work, shopping, attending religious services, medical appointments, dining out, etc. outside of the setting, and who in the setting will facilitate and support access to these activities.
- The setting allows individuals the freedom to move about inside and outside of the setting as opposed to one restricted room or area within the setting, and individuals receiving HCBS do so in an area of the setting that is fully integrated with individuals not receiving Medicaid HCBS
- The building is in the community, located among other residential buildings, private businesses, retail businesses, restaurants, doctor's offices, etc., and its proximity to these resources facilitates integration with the greater community.
- Other than those members for whom Grant Blackford is the representative payee for Social Security benefits, members have full unrestricted access to financial institutions of their choice. Grant Blackford policy is specifically clear that members are not required to sign over his/her paychecks to the provider.

- There are public transportation resources available in Marion. The nearest bus stop is on the street immediately in front of Cornerstone. The setting posts contact information for private taxi services and Medicaid-funded transportation.
 - The setting is physically accessible, including wheelchair ramps, accessible bathrooms, and an elevator.
 - There are no provider-established restrictions on member's ability to seek out and engage in competitive employment.
- 2. The setting is selected by the individual from among setting options, including non-disability specific settings. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs and preferences.**
- The setting reflect individual needs and preferences, and its policies ensure the informed choice of a member.
 - The setting offers the opportunity for a member to choose to combine more than one service delivery setting or type of HCBS. Members have full choice as to what services they will receive (including HCBS), who will provide those services, and where those services are provided.
- 3. The setting ensures an individual's rights of privacy, dignity, and respect, and freedom from coercion and restraint.**
- All information about individuals is kept private. Grant Blackford has a privacy/HIPAA policy applicable to all staff which extends to electronic medical records, and areas with confidential and protected health information are kept locked.
 - Grant Blackford has a policy prohibiting the use of restraints and/or restrictive interventions.
 - Grant Blackford has a policy in place for all staff which ensures that supports and plans to address behavioral needs are specific to the member, and are not restrictive to the rights of other members receiving services at the setting.
- 4. The setting 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.**
- The only areas at Cornerstone which are locked or otherwise inaccessible to outpatient members are areas for medication storage, areas with confidential/protected health information, utility/janitorial storage areas, and entrance doors to the inpatient unit.
 - Members receiving outpatient services at Cornerstone are free to choose with whom to do activities in the setting or outside the setting, and are never assigned only to be with a certain group of people.

- Meals are not provided at Cornerstone as a routine part of outpatient services. Vending machines are available and there are no restrictions on eating or drinking while inside Cornerstone.
- Information on individual member rights and responsibilities are clearly posted in the entrance lobby, including how to make anonymous complaints and request different service providers.
- Members receiving Medicaid-funded services and supports may engage in legal activities in the same manner as individuals who are not receiving Medicaid-funded services and supports.

5. The setting facilitates individual choice regarding services and supports, and who provides them

- Individuals are provided a choice regarding the services, provider, and settings and the opportunity to visit/understand the options, and affords individuals the opportunity to regularly and periodically update or change their service and support preferences.
- Grant Blackford's service provision policies ensure that members are supported in developing person-centered treatment plans to support their individual needs and preferences, including how to make a request for additional HCBS, or changes to their current HCBS.

Based on the above characteristics, Cornerstone is fully compliant with the requirements of the CMS HCBS Settings Final Rule for non-residential settings.

Name of Setting: Four County Main Office

SOA: Four County Counseling Center, Inc.

Address: ~~XXXXXXXXXX~~ Logansport IN 46947

Type of Setting: Provider Owned, Controlled, or Operated (POCO) Non-Residential Setting

HS Category: Prong 1; the setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment

Brief Description of Setting: Outpatient care setting.

Public Comment/State Response: There were no public comments from the public posting.

Support Submitted by the State to Demonstrate Setting Progress in Overcoming the Institutional Presumption Status by DMHA: DMHA will show that Four County Main Office (1) overcomes the presumption of institutionalism, and (2) is fully compliant with the Centers for Medicare and Medicaid Services (CMS) HCBS Settings Final Rule.

Evidence of overcoming institutional status:

- 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.**
 - The setting affords opportunities for individual schedules that focus on the needs and desires of an individual and an opportunity for individual growth.
 - The setting affords opportunities for individuals to have knowledge of or access to information regarding age-appropriate activities including competitive work, shopping, attending religious services, medical appointments, dining out, etc. outside of the setting, and who in the setting will facilitate and support access to these activities.
 - The setting allows individuals the freedom to move about inside and outside of the setting as opposed to one restricted room or area within the setting, and individuals receiving HCBS do so in an area of the setting that is fully integrated with individuals not receiving Medicaid HCBS.
 - The building is in the community, located among other residential buildings, private businesses, retail businesses, restaurants, doctor's offices, etc., and its proximity to these resources facilitates integration with the greater community.
 - Other than those members for whom Four County is the representative payee for Social Security benefits, members have full unrestricted access to financial institutions of their

choice. Four County policy is specifically clear that members are not required to sign over his/her paychecks to the provider.

- There are ample public transportation resources available in Logansport. The nearest bus stop is on the street immediately in front of Four County Main Office. The setting posts contact information for private taxi services and Medicaid-funded transportation.
- The setting is physically accessible, including wheelchair ramps, access to accessible bathrooms, and an elevator.
- There are no provider-established restrictions on member's ability to seek out and engage in competitive employment.

2. The setting is selected by the individual from among setting options, including non-disability specific settings. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs and preferences.

- The setting reflect individual needs and preferences, and its policies ensure the informed choice of a member.
- The setting offers the opportunity for a member to choose to combine more than one service delivery setting or type of HCBS. Members have full choice as to what services they will receive (including HCBS), who will provide those services, and where those services are provided.

3. The setting ensures an individual's rights of privacy, dignity, and respect, and freedom from coercion and restraint.

- All information about individuals is kept private. Four County has a privacy/HIPAA policy applicable to all staff which extends to electronic medical records, and areas with confidential and protected health information are kept locked.
- Four County has a policy prohibiting the use of restraints and/or restrictive interventions.
- Four County policy ensures that supports and plans to address behavioral needs are specific to the member, and are not restrictive to the rights of other members receiving services at the setting.

4. The setting 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.

- The only areas at Four County Main Office which are locked or otherwise inaccessible to outpatient members are areas for medication storage, areas with confidential/protected health information, and utility/janitorial storage areas.

- Members receiving outpatient services at Four County Main Office are free to choose with whom to do activities in the setting or outside the setting, and are never assigned only to be with a certain group of people.
- Meals are not provided in the outpatient services areas, but vending machines are available throughout the building and there are no restrictions on eating or drinking while inside Four County Main Office.
- Information on individual member rights and responsibilities are clearly posted in the entrance lobby, including how to make anonymous complaints and requesting different service providers.
- Members receiving Medicaid-funded services and supports may engage in legal activities in the same manner as individuals who are not receiving Medicaid-funded services and supports.

5. The setting facilitates individual choice regarding services and supports, and who provides them.

- Individuals are provided a choice regarding the services, provider, and settings and the opportunity to visit/understand the options, and affords individuals the opportunity to regularly and periodically update or change their service and support preferences.
- Four County's operating policies ensure that members are supported in developing person-centered treatment plans to support their individual needs and preferences, including how to make a request for additional HCBS, or changes to their current HCBS.

Based on the above characteristics, Four County Main Office is fully compliant with the requirements of the CMS HCBS Settings Final Rule.

Name of Setting: Oaklawn Main Office (Goshen Campus)

SOA: Oaklawn Psychiatric Center, Inc.

Address: ~~XXXXXXXXXX~~ Goshen IN 46527

Type of Setting: Provider Owned, Controlled, or Operated (POCO) Non-Residential Setting

HS Category: Prong 1; the setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment.

Brief Description of Setting: Outpatient care setting.

Public Comment/State Response: There were no public comments from the public posting.

Support Submitted by the State to Demonstrate Setting Progress in Overcoming the Institutional Presumption Status by DMHA: DMHA will show that Oaklawn Main Office (1) overcomes the presumption of institutionalism, and (2) is fully compliant with the Centers for Medicare and Medicaid Services (CMS) HCBS Settings Final Rule for non-residential settings. Based on this evidence, DMHA concludes that CMS should find Oaklawn Main Office is a community-based setting, and is therefore an eligible setting for delivery of HCBS.

Evidence of overcoming institutional status:

- 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.**
 - Setting is located in the community among other residences and retail businesses.
 - Setting is handicapped accessible with wide doors, automatic door openers and handicapped bathrooms.
 - Clients have access and control over their funds unless otherwise required by the Social Security Administration for the client to have a representative payee.
 - Taxis are available in the area but no bus stop near the setting. Oaklawn provides transportation for clients to attend appointments by either staff assisting or by paying for taxi to bring the client to the setting.
 - The main office is located on a campus open to the public for walking/runs and playground usage.
 - The setting affords opportunities for individuals to have knowledge of and access to information regarding activities outside of the setting, including competitive work and medical appointments, and who in the setting will facilitate and support access to these activities.

2. **The setting is selected by the individual from among setting options, including non-disability specific settings. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs and preferences.**
 - Individuals are given a choice of available service/treatment options at the office, and have the option to receive their services at other community-based outpatient sites operated by Oaklawn.
 - The setting reflects individual needs and preferences and has policies that ensure the informed choice of the individual.
 - Individuals are connected with community activities that foster relationships with community members unaffiliated with the setting.

3. **The setting ensures an individual's rights of privacy, dignity, and respect, and freedom from coercion and restraint.**
 - Staff ask members about services and supports they want and need.
 - All information about individuals are kept private.
 - The setting employs policies to ensure staff interacts and communicates with individuals respectfully and in a manner in which the person would like to be addressed.
 - The setting policies ensure that each individual's supports and plans to address behavioral needs are specific to the individual.
 - Oaklawn has a standing policy prohibiting the use of seclusion or restraints.

4. **The setting 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.**
 - The setting affords a variety of meaningful non-work activities that are responsive to the goals, interests, and needs of the individuals.
 - The physical environment of the setting supports a variety of individual goals and needs.
 - The setting affords opportunities for individuals to choose with whom to do activities in the setting or outside the setting.
 - The setting posts and provides information on individual rights and responsibilities.
 - The setting affords the opportunity for tasks and activities matched to the individual's skills, abilities, and desires.

5. **The setting facilitates individual choice regarding services and supports, and who provides them.**
 - Individuals at the setting are provided a choice regarding the services, provider, and settings.
 - Individuals at the setting are able to regularly or periodically update or change their preferences.

- The setting affords the individual with the opportunity to participate in meaningful non-work activities in integrated community settings in a manner consistent with the individual's needs and preferences.
- The setting policies ensure the individual is supported in developing plans to support his/her needs and preferences, and staff are knowledgeable about the capabilities, interests, preferences, and needs of the individual.
- The setting posts or provides information to individuals about how to make a request for additional HCBS or changes in their current HCBS.

Based on the above characteristics, the Oaklawn Main Office is fully compliant with the requirements of the CMS HCBS Settings Final Rule.

Name of Setting: Porter-Starke Outpatient Office

SOA: Porter-Starke Services, Inc.

Address: ~~XXXXXXXXXXXXXXXXXXXX~~ 46383

Type of Setting: Provider Owned, Controlled, or Operated (POCO) Non-Residential Setting

HS Category: Prong 1; the setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment.

Brief Description of Setting: Outpatient care setting.

Public Comment/State Response: There were no public comments from the public posting.

Support Submitted by the State to Demonstrate Setting Progress in Overcoming the Institutional Presumption Status by DMHA: DMHA will show that the Porter-Starke Outpatient Office (1) overcomes the presumption of institutionalism, and (2) is fully compliant with the Centers for Medicare and Medicaid Services (CMS) HCBS Settings Final Rule. Based on this evidence, DMHA concludes that CMS should find the Porter-Starke Outpatient Office is a community-based setting, and is therefore an eligible setting for delivery of HCBS.

Evidence of overcoming institutional status:

- 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.**
 - All buildings have automatic doors and ramps which allow people in wheelchairs to access the building. All public restrooms meet the ADA requirements for accessibility.
 - Setting is located in the community among other residences and retail businesses. The following retail businesses are within one-half mile: CVS, Walgreens, Goodwill and Kmart; two grocery stores; and multiple churches. Bus stops and taxis are available in the area. The Valparaiso Transit System (V-Line) bus stop is across the street from the 701 Wall Street location approximately 266 feet walk / approx. 1-2 minutes. The only taxi service in the area is Crazy Kab. Rates appear to make this option prohibitive for most of our clients (\$ 4.00 Pick Up Fee \$ 2.50 Per Mile .30 cents per minute wait time/ \$ 18.00 per hour). The V-Line is across the street from 701 Wall Street and we typically provide bus tokens (funded by local grant) to clients. Many clients we serve qualify to receive discounted bus passes. PSS staff assist with applications for these programs. The setting affords opportunities for individuals to have knowledge of and access to information regarding activities outside of the setting, including competitive work and medical appointments, and who in the setting will facilitate and support access to these activities. The setting provides space for Alcoholic Anonymous, Narcotics Anonymous, Depression & Bipolar Support Alliance, and the National Alliance on Mental Illness meetings and these meetings are open to the public.

- 2. The setting is selected by the individual from among setting options, including non-disability specific settings. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs and preferences.**
 - Individuals are given a choice of available service/treatment options at the office.
 - The setting reflects individual needs and preferences and has policies that ensure the informed choice of the individual.
 - Individuals are connected with community activities that foster relationships with community members that are unaffiliated with the setting.

- 3. The setting ensures an individual's rights of privacy, dignity, and respect, and freedom from coercion and restraint.**
 - Staff asks members about services and supports they want and need and then that information is incorporated into their individualized treatment plan.
 - Information about individuals are kept private.
 - The setting policies ensure that staff interacts and communicates with individuals respectfully and in a manner in which the person would like to be addressed.
 - The setting policies ensure that each individual's supports and plans to address behavioral needs are specific to the individual.
 - PSS has a standing policy prohibiting the use of seclusion or restraints.

- 4. The setting 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.**
 - The setting affords a variety of meaningful non-work activities that are responsive to the goals, interests, and needs of the individuals.
 - The physical environment of the setting supports a variety of individual goals and needs by posting community events as well as different therapy groups that address client needs.
 - The setting affords opportunities for individuals to choose with whom to do activities in the setting or outside of the setting.
 - The setting posts information on individual rights and responsibilities which includes contact information for making anonymous complaints. The client is also provided this information on day of admission into the program, explaining the form and answering any questions. .
 - The setting affords the opportunity for tasks and activities matched to the individual's skills, abilities, and desires.

- 5. The setting facilitates individual choice regarding services and supports, and who provides them.**

- Individuals at the setting are provided a choice regarding the services, provider, and settings. The provider has four POCO non-residential offices that are available to clients from which to choose where they receive services.
- Individuals at the setting are able to regularly and periodically update or change their preferences on which staff member provides their services.
- The setting affords the individual with the opportunity to participate in meaningful non-work activities in integrated community settings in a manner consistent with the individual's needs and preferences.
- The setting staff is knowledgeable about the capabilities, interests, preferences, and needs of the individual.
- The setting posts and provides information to individuals about how to make a request for additional HCBS or changes in their current HBCS.

Based on the above characteristics, the Porter-Starke Outpatient Office is fully compliant with the requirements of the CMS HCBS Settings Final Rule.

Name of Setting: Stark Center

SOA: Regional Mental Health Center

Address: ~~XXXXXXXXXXXX~~ East Chicago IN 46312

Type of Setting: Provider Owned, Controlled, or Operated (POCO) Non-Residential Setting

HS Category: Prong 1; the setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment.

Brief Description of Setting: Outpatient care setting.

Public Comment/State Response: There were no public comments from the public posting.

Support Submitted by the State to Demonstrate Setting Progress in Overcoming the Institutional Presumption Status by DMHA: DMHA will show that Stark Center (1) overcomes the presumption of institutionalism, and (2) is fully compliant with the Centers for Medicare and Medicaid Services (CMS) HCBS Settings Final Rule. Based on this evidence, DMHA concludes that CMS should find Stark Center is a community-based setting, and is therefore an eligible setting for delivery of HCBS.

Evidence of overcoming institutional status:

- 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.**
 - The setting affords opportunities for individual schedules that focus on the needs and desires of an individual and an opportunity for individual growth.
 - The setting affords opportunities for individuals to have knowledge of or access to information regarding age-appropriate activities including competitive work, shopping, attending religious services, medical appointments, dining out, etc. outside of the setting, and who in the setting will facilitate and support access to these activities.
 - The setting allows individuals the freedom to move about inside and outside of the setting as opposed to one restricted room or area within the setting, and individuals receiving HCBS do so in an area of the setting that is fully integrated with individuals not receiving Medicaid HCBS.
 - The building is in the community, located among other residential buildings, private businesses, retail businesses, restaurants, doctor's offices, etc., and its proximity to these resources facilitates integration with the greater community.
 - Other than those members for whom Regional is the representative payee for Social Security benefits, members have full unrestricted access to financial institutions of their choice. Regional policy is specifically clear that members are not required to sign over his/her paychecks to the provider.
 - There are ample public transportation resources available in East Chicago. The nearest bus stop is on the street immediately in front of Stark Center at the intersection of Indianapolis Blvd and

Columbus Ave. The setting posts contact information for private taxi services and Medicaid-funded transportation.

- The setting is physically accessible, including wheelchair ramps and accessible bathrooms. All community-based services are provided on the main (ground level) floor of the building.
- There are no provider-established restrictions on member's ability to seek out and engage in competitive employment.

2. The setting is selected by the individual from among setting options, including non-disability specific settings. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs and preferences.

- The setting reflect individual needs and preferences, and its policies ensure the informed choice of a member.
- The setting offers the opportunity for a member to choose to combine more than one service delivery setting or type of HCBS.
- Members have full choice as to what services they will receive (including HCBS), who will provide those services, and where those services are provided.

3. The setting ensures an individual's rights of privacy, dignity, and respect, and freedom from coercion and restraint.

- All information about individuals is kept private. Regional has a privacy/HIPAA policy applicable to all staff which extends to electronic medical records, and areas with confidential and protected health information are kept locked.
- Regional has a policy prohibiting the use of restraints and/or restrictive interventions.
- Regional has a policy in place for all staff which ensures that supports and plans to address behavioral needs are specific to the member, and are not restrictive to the rights of other members receiving services at the setting.

4. The setting 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.

- The only areas at Stark Center which are locked or otherwise inaccessible to outpatient members are areas for medication storage, areas with confidential/protected health information, utility/janitorial storage areas, and entrance doors to the residential substance abuse treatment area.
- Members receiving outpatient services at Stark Center are free to choose with whom to do activities in the setting or outside the setting, and are never assigned only to be with a certain group of people.
- Meals are not provided in the outpatient services areas, but vending machines are available and there are no restrictions on eating or drinking while inside Stark Center.
- Information on individual member rights and responsibilities are clearly posted in the entrance lobby, including how to make anonymous complaints and request different service providers.
- Members receiving Medicaid-funded services and supports may engage in legal activities in the same manner as individuals who are not receiving Medicaid-funded services and supports.

5. The setting facilitates individual choice regarding services and supports, and who provides them.

- Individuals are provided a choice regarding the services, provider, and settings and the opportunity to visit/understand the options, and affords individuals the opportunity to regularly and periodically update or change their service and support preferences.
- Regional's service provision policies ensure that members are supported in developing person-centered treatment plans to support their individual needs and preferences, including how to make a request for additional HCBS, or changes to their current HCBS.

Based on the above characteristics, Stark Center is fully compliant with the requirements of the CMS HCBS Settings Final Rule for non-residential settings.

Name of Setting: Strawhun Center

SOA: Regional Mental Health Center

Address: ~~XXXXXXXXXXXX~~ville IN 46410

Type of Setting: Provider Owned, Controlled, or Operated (POCO) Non-Residential Setting

HS Category: Prong 1; the setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment.

Brief Description of Setting: Outpatient care setting.

Public Comment/State Response: There were no public comments from the public posting.

Support Submitted by the State to Demonstrate Setting Progress in Overcoming the Institutional Presumption Status by DMHA: DMHA will show that Strawhun Center (1) overcomes the presumption of institutionalism, and (2) is fully compliant with the Centers for Medicare and Medicaid Services (CMS) HCBS Settings Final Rule. Based on this evidence, DMHA concludes that CMS should find Strawhun Center is a community-based setting, and is therefore an eligible setting for delivery of HCBS.

Evidence of overcoming institutional status:

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.

- The setting affords opportunities for individual schedules that focus on the needs and desires of an individual and an opportunity for individual growth.
- The setting affords opportunities for individuals to have knowledge of or access to information regarding age-appropriate activities including competitive work, shopping, attending religious services, medical appointments, dining out, etc. outside of the setting, and who in the setting will facilitate and support access to these activities.
- The setting allows individuals the freedom to move about inside and outside of the setting as opposed to one restricted room or area within the setting, and individuals receiving HCBS do so in an area of the setting that is fully integrated with individuals not receiving Medicaid HCBS.
- The building is in the community, located among other residential buildings, private businesses, retail businesses, restaurants, doctor's offices, etc., and its proximity to these resources facilitates integration with the greater community.
- Other than those members for whom Regional is the representative payee for Social Security benefits, members have full unrestricted access to financial institutions of their choice. Regional policy is specifically clear that a member is not required to sign over his/her paychecks to the provider.

- There are ample public transportation resources available in Merrillville. The nearest bus stop is on the street in front of Strawhun Center, at the intersection of Taft St and 93rd Ave. The setting posts contact information for private taxi services and Medicaid-funded transportation.
- The setting is physically accessible, including wheelchair ramps, accessible bathrooms, and an elevator.
- There are no provider-established restrictions on member's ability to seek out and engage in competitive employment.

2. The setting is selected by the individual from among setting options, including non-disability specific settings. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs and preferences.

- The setting reflect individual needs and preferences, and its policies ensure the informed choice of a member.
- The setting offers the opportunity for a member to choose to combine more than one service delivery setting or type of HCBS.
- Members have full choice as to what services they will receive (including HCBS), who will provide those services, and where those services are provided.

3. The setting ensures an individual's rights of privacy, dignity, and respect, and freedom from coercion and restraint.

- All information about individuals is kept private. Regional has a privacy/HIPAA policy applicable to all staff which extends to electronic medical records, and areas with confidential and protected health information are kept locked.
- Regional has a policy prohibiting the use of restraints and/or restrictive interventions.
- Regional has a policy in place for all staff which ensures that supports and plans to address behavioral needs are specific to the member, and are not restrictive to the rights of other members receiving services at the setting.

4. The setting 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.

- The only areas at Strawhun Center which are locked or otherwise inaccessible to outpatient members are areas for medication storage, areas with confidential/protected health information, utility/ janitorial storage areas, and entrance doors to the inpatient unit and residential substance abuse treatment area.
- Members receiving outpatient services at the Strawhun Center are free to choose with whom to do activities in the setting or outside the setting, and are never assigned only to be with a certain group of people.

- Meals are not provided at Strawhun Center as a routine part of outpatient services, but members and staff have access to a dining area which serves meals (this is an adjunct feature of the dining service for the inpatient and residential substance abuse treatment units). Vending machines are available and there are no restrictions on eating or drinking while inside Strawhun Center.
- Information on individual member rights and responsibilities are clearly posted in the entrance lobby, including how to make anonymous complaints and request different service providers.
- Members receiving Medicaid-funded services and supports may engage in legal activities in the same manner as individuals who are not receiving Medicaid-funded services and supports.

5. The setting facilitates individual choice regarding services and supports, and who provides them.

- Individuals are provided a choice regarding the services, provider, and settings and the opportunity to visit/understand the options, and affords individuals the opportunity to regularly and periodically update or change their service and support preferences.
- Regional's service provision policies ensure that members are supported in developing person-centered treatment plans to support their individual needs and preferences, including how to make a request for additional HCBS, or changes to their current HCBS.

Based on the above characteristics, Strawhun Center is fully compliant with the requirements of the CMS HCBS Settings Final Rule for non-residential settings.

Name of Setting: Vigo County Outpatient Services

SOA: Hamilton Center, Inc.

Address: ~~XXXXXXXXXXXX~~re Haute IN 47804

Type of Setting: Provider Owned, Controlled, or Operated (POCO) Non-Residential Setting

HS Category: Prong 1; the setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment.

Brief Description of Setting: Outpatient care setting.

Public Comment/State Response: There were no public comments from the public posting.

Support Submitted by the State to Demonstrate Setting Progress in Overcoming the Institutional Presumption Status by DMHA: DMHA will show that Vigo County Outpatient Services (1) overcomes the presumption of institutionalism, and (2) is fully compliant with the Centers for Medicare and Medicaid Services (CMS) HCBS Settings Final Rule for non-residential settings. Based on this evidence, DMHA concludes that CMS should find Vigo County Outpatient Services is a community-based setting, and is therefore an eligible setting for delivery of HCBS.

Evidence of overcoming institutional status:

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.**
 - Setting is located in the community among other residences and retail businesses. Within a mile of the office, there are local churches, nature parks and convenience stores. Within a two mile radius, there are two public libraries.
 - Bus stops and taxis are available in the area within 300 feet of the outpatient office. **(Exhibit A)** Vigo County does have a public bus system that usually runs until 7:00 pm in the evening and Medicaid transportation may be available as long as the consumer books in advance.
 - 620 Eighth Avenue is handicapped accessible including bathrooms and entrances. Vigo County also has available handicapped accessible transportation.
 - The setting affords opportunities for individuals to have knowledge of and access to information regarding activities including competitive work, medical appointments outside of the setting, and who in the setting will facilitate and support access to these activities.

2. **The setting is selected by the individual from among setting options, including non-disability specific settings. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs and preferences.**

- Individuals are given a choice of available service/treatment options at the office, and have the option to receive their services at other community-based outpatient sites operated by HCI.
- The setting reflects individual needs and preferences and has policies that ensure the informed choice of the individual.
- Individuals are connected with community activities that foster relationships with community members unaffiliated with the setting.

3. The setting ensures an individual's rights of privacy, dignity, and respect, and freedom from coercion and restraint.

- Staff ask members about services and supports they want and need. Once the information is obtained it is then transferred to the IICP. Although IICPs are reviewed every 90 days, if client requests changes to occur prior to the review date, changes will be addressed.
- Information about individuals are kept private.
- The setting policies ensures that staff interacts and communicates with individuals respectfully and in a manner in which the person would like to be addressed.
- The setting policies ensure that each individual's supports and plans to address behavioral needs are specific to the individual.
- HCI has a standing policy prohibiting the use of seclusion or restraints in the HCBS outpatient services setting.

4. The setting 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.

- The setting affords a variety of meaningful non-work activities that are responsive to the goals, interests, and needs of the individuals.
- The physical environment of the setting support a variety of individual goals and needs.
- The setting affords opportunities for individuals to choose with whom to do activities in the setting or outside the setting.
- The setting posts and provides information on individual rights and responsibilities. Prior to moving in, staff reviews, explains and then answers any questions the client may have.
- The setting affords the opportunity for tasks and activities matched to the individual's skills, abilities, and desires.

5. The setting facilitates individual choice regarding services and supports, and who provides them

- Individuals at the setting are provided a choice regarding the services, provider, and settings. When a client requires additional housing support than what living in a private/independent home provides, the member and their support/treatment team discuss the available residential setting options from which the client decides the best setting based on their needs.

- Individuals at the setting are able to regularly or periodically update or change their preferences.
- The setting affords the individual with the opportunity to participate in meaningful non-work activities in integrated community settings in a manner consistent with the individual's needs and preferences.
- The setting has policies that ensure individuals are supported in developing plans to support his/her needs and preferences, and setting staff are knowledgeable about the capabilities, interests, preferences, and needs of the individual.
- The setting posts or provides information to individuals about how to make a request for additional HCBS or changes in current services.

Based on the above characteristics, Vigo County Outpatient Services is fully compliant with the requirements of the CMS HCBS Settings Final Rule.