



### HCBS Non-Residential Provider Setting Evidence Tool

<b>Date of Review:</b> March 11, 2024	<b>Provider Name:</b> Palolo Chinese Home Senior Day Care <b>Address:</b> 2459 10 <sup>th</sup> Avenue, Honolulu, HI 96816	<b>Provider ID:</b> 29	<b># Medicaid Individuals:</b> 13
<b>Reason(s) for Presumed Non-Compliance:</b> <b>Prong 1:</b> The setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment.			
<b>Setting Description:</b> Palolo Chinese Home Adult Day Care is located in Honolulu, Oahu. Palolo Chinese Home offers multiple services such as Senior Day Care, Short-Term Respite, Rehabilitation, Hospice Care, Adult Residential Care, and Skilled Nursing and Intermediate Care. The Senior Day Care is licensed by the Department of Health, Office of Health Care Assurance. The Senior Day Care is located in the Long-Term Care facility.  <b>History:</b> In 1852, the Chinese were the first of many to immigrate to Hawaii as sugar plantation laborers. Their contracts with the plantations gave them food and shelter, but once these contracts ended, the former plantation laborers had no housing, were often destitute, and lived off the street.  Each of the ethnic groups that came to Hawaii brought their own traditions and values to the host culture. The Chinese maintained a 3000-year-old ethic of filial piety and benevolence towards the elderly. This respect and care for elders motivated of Hawaii's Chinese leaders to launch a drive in 1896 to establish a hospital in downtown Honolulu to serve the homeless.  The needs of the community changed, but there continued to be a need for a "home for the aged and infirmed." Funds from the defunct Chinese Hospital were added to community contributions to purchase 15 acres in Palolo Valley on Oahu, the site of the Palolo Chinese Home, to serve people of all ethnicities.			



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	HCBS Requirements	Meets	Summary of Findings from Site Visit(s) and Desk Review
1	<p>42 CFR 441.301 (c)(4)(i)</p> <p>The setting is integrated in and supports full access of members 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 members not receiving Medicaid HCBS.</p>	<p><input type="checkbox"/> YES</p> <p><input checked="" type="checkbox"/> NO</p>	<p><b>Findings:</b></p> <p>There is a posted daily schedule of activities written on board and a monthly activities board. The daily schedule is a guideline and staff encourage participation, but it is not a requirement. Activities are flexible based on the member's choices and preferences.</p> <p>One member shared that she controls her daily schedule and enjoys participating in group activities. Some members were observed participating in group exercise while others were engaged in individual activity.</p> <p>One member was observed roaming freely in the program and outside the patio. The members go to the patio to sit, walk around, relax, and/or socialize with others. When the weather is bad and the floor is wet from the rain, members are encouraged to remain indoors to ensure safety and prevent injuries/falls.</p> <p>Employment and/or volunteer work is supported in this facility, however, members are mostly in their late adulthood. One member shared that she is already retired.</p> <p>Staff stated that a company van is used to transport members to the community and social activities. Members engage in off-site community activities as a group due to lack of staff and transportation. Monthly meetings are held with the members to discuss and obtain input regarding community outings, activities, and meals. Members decide on outings as a group, but each member's preference is considered for future outings and activities. One member expressed that she enjoys off-site activities and has no specific preference.</p> <p>Per staff, volunteers and groups from the community also come to the program to sing, play music, perform hula, and do arts/crafts/painting with the members. Members are allowed to engage with the performers.</p>



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			Members are allowed to bring their money and personal belongings if they choose to. Some families may request the facility to hold the member's money for safe keeping. One member shared that she brings her purse and money to program and has access to it whenever she wants. The members have their own cubby to store their belongings, however, most prefer to keep their personal belongings near them.
2	<p>42 CFR 441.301 (c)(4)(ii)</p> <p>The setting is selected by the member from among setting options, including non-disability specific settings. The settings options are identified and documented in the person-centered plan and are based on the member's needs and preferences.</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<p><b>Findings:</b></p> <p>ADC does not have copies of the members' health action plans.</p> <p>One member interviewed shared that she does not know what person-centered planning is and does not recall participating in such meetings. The program manager reported that members have person-centered plans on admission, however, they are not updated on a regular basis. Member chart was reviewed and person-centered plan is present but not up to date.</p> <p>Group meetings are held between staff and members at the end of each month. Members are asked their preferred activities, things that need to be improved, and families are updated. Members are supported by staff if option is to attend another day program.</p>
3	<p>42 CFR 441.301 (c)(4)(iii)</p> <p>The setting ensures member's right of privacy, dignity, and respect and freedom from coercion and restraint.</p>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	<p><b>Findings:</b></p> <p>The member's rights are displayed on the wall at the facility. Members are given a copy of their rights on admission. One member stated that she has certain rights at program. Member charts are located in a locked cabinet. One member shared that her personal information is kept private and only staff knows her information.</p> <p>Staff have open communication with their members and families. Members are able to fill-out a complaint form to voice their issues and concerns. Staff will assist the members to address the issues, concerns, or complaints. One member denied having any issues with other participants or the staff. Another member voiced that she will inform her son or a staff member if she has problems or issues at program. Members are supported and encouraged to make informed decisions and choices.</p> <p>Restraints are not used in this facility and members deny being restrained.</p>



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			<p>Staff are attentive to signs of abuse, neglect, and exploitation. They are able to assist members to access information on various resources. Staff were observed interacting with members in a caring and respectful way. One member expressed that the staff are nice and respectful.</p> <p>There are two unisex bathrooms in the day care with call buttons. One bathroom is lockable with two enclosed stalls (doors can close) and a shower. The other bathroom does not have a lockable door. Members are given privacy when using the bathroom. Support staff will be present if a member is at risk for falls or when assistance is needed. One member shared that she is able to use the bathroom privately.</p> <p>Members can choose to bring their personal cell phone or use day care phone. One member shared that she brings her personal cell phone and has privacy when using it.</p>
4	<p>42 CFR 441.301 (c)(4)(iv)          The setting optimizes, but does not regiment, member initiative, autonomy, and independence in making life choices including but not limited to daily activities, physical environment, and with whom to interact.</p>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Although there is a daily set schedule of activities, members have control of their schedules based on their needs and preferences. Members have options and choices, and staff support the members' choices and preferences.</p> <p>Member does not want to learn how to use the bus. She stated she uses Handi-van and/or family car for transportation.</p>
5	<p>42 CFR 441.301 (c)(4)(v)          The setting facilitates member choice regarding services, supports, and who provides them.</p>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Staff will assist members and their families if a new day program is requested. Staff are attentive to each member's needs and preferences. The member's needs and preferences are indicated in the member's chart.</p> <p>One member stated she would communicate with her son if she needed to change day care or support staff. Other members shared that they would talk to the clerk or program manager. Another member expressed that she likes attending this day care and does not want to relocate.</p>



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6	<p>42 CFR 441.301 (c)(4)(vi)(C)</p> <p>Members have the freedom and support</p> <ul style="list-style-type: none"> <li>to control their schedules and activities</li> <li>to have access to food anytime</li> </ul>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Although there is a daily schedule of activities, members have the choice to participate or engage in other activities of their choice. Participation is encouraged but not mandatory/required.</p> <p>Food menu for March was posted on the wall with scheduled mealtimes:          Breakfast – 7-8am          Lunch – 1130-12pm          Snacks -2:15pm</p> <p>The mealtimes are flexible. Members can access food of their choice at any time. They can also choose to bring their own food and snacks. Monthly meetings are held with members to discuss and plan activities, outings, and food menu.</p> <p>One member shared that she likes the food and snacks provided at day care, and there are options to choose from. She does not bring her own food/snacks but is aware that others do. Other members reported that there are 3 meal options to choose from and they generally like the food they are served at the facility. A non-medicaid member was served breakfast upon arrival beyond breakfast time.</p>
7	<p>42 CFR 441.301 (c)(4)(vi)(D)</p> <p>Members have the right to visitors and access to family and friends.</p>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>Visitors are allowed to visit at any time. Courtesy notice is preferred, if possible, for safety reasons. However, unannounced visits are welcomed. Members can meet with their visitors privately. There is an outside lanai/patio with chairs, tables, and shades.</p> <p>One member shared that visitors are allowed, but no one really comes to visit her.</p>
8	<p>42 CFR 441.301 l(4)(vi)(E)</p> <p>Setting is physically accessible to the member.</p>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<p>There are at least 2 emergency exits and a wheelchair-accessible ramp. There is ample space to roam around in the day care, as well as an outside patio where members can walk, sit, and/or relax.</p> <p>For the safety of members who have a history of wandering and falls risk, bathroom door and main entrance door alarms are used, and patio gates are closed (but can be accessible any time).</p>



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<b>9</b>	42 CFR 441.301(c)(5)(v) <b>Prong 1:</b> The setting is located in a building that is also a publicly or privately operated facility that provides inpatient institutional treatment.	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<b>Findings:</b> The Senior Day Care is in the same building as the nursing facility and Expanded-Adult Residential Care Home. It can be accessed through a separate entrance or using the nursing facility elevator.
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Provider Corrective Action Plan (including timelines, if not already implemented) & State Oversight to Verify Implementation:

HCBS Requirement	Action Required	Corrective Action Plan	Completion Date	State Oversight
42 CFR 441.301 (c)(4)(i)	Demonstrate how individual choice is taken into consideration and if the program has the capacity to support that need.	<p>On April 19, 2024, the following was reviewed and will be completed on all the HCBS participants by the Day Care Manager:</p> <p>a. A day care assessment will be completed on newly admitted and of all current participants indicating their choices with employment opportunities, community life, control of personal resources and community services.</p> <p>b. Based on this assessment and health action plan, a person-centered plan will be established to meet the participant's choices.</p> <p>c. A care conference will be conducted with the participant and authorized representative to review/update the assessment and care plan on April 26, 2024, new admissions, any time there's a significant change and annually.            On April 18, 2024 all of the staff was in serviced on the "ADC Members Participating in the Community" policy</p>	Date completed: April 26, 2024	<p>The State reviewed the following policies and procedures that ensure individual choice and community integration:</p> <ul style="list-style-type: none"> <li>- ADC Members Participating in the Community Policy and Procedures</li> <li>- Activities Policy and Procedures</li> <li>- Field Trips Policy and Procedures</li> <li>- Person Centered Care Planning Policy and Procedures</li> </ul> <p>The State will verify implementation by end of Quarter 2, June 2024.</p>



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		<p>and procedure Medicaid HCBS requirement that individual choice is taken into consideration and that staff are trained on the HCBS Setting Final Rule/My Choice My Way.</p> <p>Future plans:        Each month the Day Care Manager will audit the records to ensure that the day care shows integration into the greater community which demonstrates individual choice and training of new staff and annually. Report to the Quality Assurance Committee findings each quarter.</p>		
	<p>Demonstrate how staff are trained on the HCBS Setting Final Rule/My Choice My Way.</p>	<p>On April 18, 2024 all of the staff was in serviced on the "ADC Members Participating in the Community" policy and procedure Medicaid HCBS requirement that individual choice is taken into consideration and that staff are trained on the HCBS Setting Final Rule/My Choice My Way.</p> <p>Future plans:        Staff training will be done for new hire upon employment then annually for all staff and attendance documented. Attendance will be audited and reported to QA committee quarterly.</p>	<p>Anticipated completion date: June 30, 2024</p>	<p>The State reviewed the Person-Centered Care Planning Policy and Procedures where the staff education on the HCBS Setting Final Rule/My Choice My Way is incorporated. The State requested additional supporting documentation to be submitted. The State will need to review the additional documents to ensure ongoing staff education.</p> <p>The State will verify implementation by</p>



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				end of Quarter 2, June 2024.
42 CFR 441.301 (c)(4)(ii)	<p>Contact health plans and request for a copy of each member's health action plan (HAP). The HAPs should be included in each of the member's own medical record charts.</p>	<p>On April 18, 2024 the Day Care Manager/designee contacted each health plan for the participant's health action plan (HAP).</p> <p>A copy of the HAP will be placed in the participant's medical record.</p> <p>Future plans:          New Admissions to ADC will have their current HAP within a week from admission date.</p> <p>The Day Care Manager/designee will audit each month for the participant's health action plan copy is in the record and integrated with the member's person-centered care plan. The information will be presented to the Quality Assurance Committee each quarter.</p>	<p>Date completed:          April 26, 2024</p>	<p>The State will verify implementation by end of Quarter 2, June 2024.</p>
	<p>Demonstrate how each member's person-centered care plans are updated.</p>	<p>Based on the information on the HAP, the participant's person-centered care plan will be reviewed and updated.</p> <p>Future plans:          Person-centered care plan will be audited monthly on admission, annually or if there is a significant change in the participant. Findings will be reported to QA committee.</p>	<p>Date completed:          April 26, 2024</p>	<p>The State reviewed the Person-Centered Care Planning Policy and Procedures that ensures that members and authorized representatives are in charge of the person-centered planning process.</p> <p>The State will verify</p>





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				implementation by end of Quarter 2, June 2024.
	Demonstrate how members and authorized representatives are in charge of the person-centered planning process.	<p>The Day Care Manager/designee will conference with the participants and authorized representatives on admission, with significant changes and annually to review the participant assessment and person-centered care plan.</p> <p>Future plans:          Member and authorized rep. will review and sign person-centered care plan. Signatures will be collected by members/ auth rep that are in charge of their person-centered planning processes during the conference.</p> <p>The medical records will be audited monthly that there are the member/authorized resp signature on admission, annually or if there is a significant change in the participant's care planning. Findings will be reported to QA committee quarterly.</p>	Date completed: April 26, 2024	<p>The State reviewed the Person-Centered Care Planning Policy and Procedures that ensures that members and authorized representatives are in charge of the person-centered planning process.</p> <p>The State will verify implementation by end of Quarter 2, June 2024.</p>
42 CFR 441.301 (c)(4)(iii)	Demonstrate how member's privacy and choice is provided when using the bathroom with the unlockable door.	<p>On April 15, 2024, the lock was changed to have a lockable door from inside the bathroom.</p> <p>There is a key to unlock door. Will be accessible to staff if prompted by member, for supervision or in an emergency.</p> <p>If a client needs help inside bathroom</p>	Anticipated completion date: June 30, 2024	<p>The State will verify implementation by end of this quarter, June 2024.</p> <p>The State reviewed the Resident Rights Policy and Procedures that ensures member's right of</p>



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		<p>there is a string pull alarm to notify staff outside of the bathroom.</p> <p>On April 18, 2024 the staff was in serviced on "Resident Rights" policy and procedure that ensures the member's right of privacy, dignity, and freedom from coercion and restraint with a lockable door lock.</p> <p>Future plan:        Training on Resident Rights policy will be done with new hires upon employment then annually. The in-service record will be kept track in the ADC in-service binder.</p> <p>The Day Care Manager will ensure that door locks are lockable for participant privacy each month and report to the Quality Assurance Committee each quarter.</p>		<p>privacy, dignity, and respect.</p>
42 CFR 441.301 (c)(5)(v)	<p>Heightened Scrutiny: Complete evidence packet and provide documents that the setting does <i>not</i> have the qualities of an institution and that the setting does have the qualities of home and community-based</p>	<p>Provided is the list of supporting documents:</p> <p>ADC Members Participating in the Community Policy and Procedures        Activities Policy and Procedures        Field Trips Policy and Procedures        Person Centered Care Planning Policy and Procedures        Residents Rights Policy and Procedures        Responses to Non-Residential Exploratory Questions</p>	<p>Anticipated completion date:        June 30, 2024</p>	<p>The State reviewed the evidence packet. The State requested additional supporting documentation to be submitted. The State will need to review the additional documents to ensure full compliance with the final rule.</p>



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	settings.			
Summary of Public Comments & State Responses:				
Additional Comments:				