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The Final Rule for Home and Community Based Services (HCBS) states that the service setting for HCBS must meet specific community based requirements in order to receive Medicaid funding. CMS has developed a process of Heightened Scrutiny that can be used for a setting that appears to be institutional or isolating but other setting attributes make this assumption appear incorrect. There are multiple steps in this process, and the inclusion of public comment is an important element.

As part of the process required by the Centers for Medicare and Medicaid Services (CMS) Final Rule for Home and Community Based Services (HCBS) for 42 CFR, the Division of Health Care Financing and Policy (DHCFP) requests public comment about the following proposal by Opportunity Village. Opportunity Village has developed plans for a community living site for individuals with intellectual disabilities called Betty's Village. Although the proposed community will be disability-specific, thus creating the presumption the residents would be isolated and therefore the setting would not meet the requirements of the HCBS final rule, the placement of the setting within a larger community context and the planned involvement of the residents with outside activities overcomes much of the supposed isolation of the disability-specific setting.

To be assured consideration, comments must be received by one of the methods provided below no later than 5:00 pm on October 2, 2015. You may submit comments in one of three ways (please choose only one of the ways listed):

- **Electronically.** You may email comments to [hcbs@dhcfp.nv.gov](mailto:hcbs@dhcfp.nv.gov). Write Betty's Village in the subject line.
- **Mail.** You may mail written comments to the following address:  
Division of Health Care Financing and Policy  
1100 E William Street, Suite 222  
ATTN: Long Term Support Services – Betty's Village  
Carson City, NV 89701
- **Fax.** You may fax comments to the following number:  
(775) 687-8724  
ATTN: Long Term Support Services – Betty's Village

All comments received before the close of the comment period are available for viewing by the public, including any personally identifiable or confidential business information that is included in a comment. We will post all the comments received by the close of the comment period, as soon as possible after they have been received, on the following web site:

<http://dhcfp.nv.gov/Home/WhatsNew/HCBS/>.

There will be a link on the page for Public Comments received.

# OPPORTUNITY VILLAGE

## Betty's Village

The world has changed. Throughout history, people with intellectual disabilities have lived very short lives. Today, medical and social advances have enabled those with disabilities to live longer, healthier and more productive lives. Now, we must tackle the consequence of this good news. Where will people with disabilities live?

Opportunity Village is developing Betty's Village to assist in meeting the ever increasing need for choice in housing options for people with intellectual disabilities. Based on the live, work, play, learn and create philosophy, Betty's Village is a place where everyone knows each other, people can follow their dreams and are encouraged and supported to become the best they possibly can be. Betty's Village will be the first of its kind in Nevada. As referenced in the Nevada State HCBS Transition Plan, the Olmstead Act emphasizes community as something that is defined by the individual, specifically, what is the definition of community to one person? Definitions will vary from person to person, but it is about individual choice.

Currently, in Southern Nevada, the home and community-based housing options for individuals with intellectual disabilities are primarily the Intensive Supported Living Arrangement (ISLA) and the Intermittent SLA. These options, while physically integrated in Southern Nevada neighborhoods do not foster social interaction within the communities. ISLAs are small group homes where 3 to 4 individuals with intellectual and developmental disabilities live and these houses usually have 24-hour (awake) staffing. These homes are physically distant from other ISLAs and cannot support the number of staff necessary for community integration activities because the staff spends all their time addressing activities of daily living (e.g. cooking, cleaning, personal grooming, etc.). ISLAs have therefore physically integrated into the community, but socially isolated their residents. Betty's Village will provide individuals another residential choice to the current residential options including non-disability specific settings being provided. Opportunity Village believes that each person should make "their choice" of "their home."

Betty's Village will be built on approximately 6.5 acres and will promote an active life that is close to work options, community resources, peers, family, and friends. The Village is centrally located with easy access to public transportation, freeways and major cross streets. Betty's Village will be integrated in and support full access of individuals receiving Medicaid Home and Community-Based Services (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.

Opportunity Village is about progress and supporting people with intellectual disabilities to reach their maximum potential and enhance their lives. The current Supported Living system does not always take into account where the person has lived for the majority of their life, only the circumstances for the placement. Individuals who have lived at home with their parents or other family members are usually not ready to move into a home that is in a different neighborhood, with other housemates that they do not know, and staff who may not know their needs and that

change regularly. Individuals moving directly from the family home generally take a lot of time to adjust before feeling comfortable in their new environment.

Opportunity Village will provide an “Enlightened Living” model that is informed, open minded, progressive, and independent. The model will have three levels of supports that individuals can choose from depending on their skills and the required level of supports. The three levels of residential supports are: a home that provides a 24/7 level of care including awake overnight supervision, an intermediate home that provides a 24/7 level of care with overnight staff availability and allows the individual to have some approved alone time, and semi-independent living with intermittent supports in their own apartment. A live-in “Resident Advocate” will support individuals in the intermediate home model who have a goal of moving into semi-independent living. The advocate will be a friend, sidekick, and developer to increase the individual’s personal, community, home and work skills to progress to the next living arrangement. A person living at home for the majority of their life would most likely start at a 24/7 level of care but after they have accomplished required living skills may choose to move to the next living model. Once an individual has accomplished independent living skills the person may choose to move into semi-independent living at the village apartments with intermittent supports. Opportunity Village would also support an individual that has the skills and chooses to move out of the village into a home or apartment. Opportunity Village will also support an individual that chooses not to move into the next level of living despite being eligible to make the next step. Opportunity Village recognizes that individuals may move from an intermittent support living situation to a higher level of supervision depending on their health needs or current issues. Opportunity Village will provide for each individual to “age in place” for as long as possible in the village.

Betty’s Village will be comprised of apartments and homes to make up a community for approximately 100 residents. The studio and one-bedroom apartments will be combined in a building that will include spaces for work training opportunities and areas for activities and socialization. The homes will be clustered together similar to a custom home cul-de-sac and share common visiting areas and outdoor spaces. The apartments and homes will be directed by a Qualified Intellectual Disability Professional (QIDP) who will assist the individual to develop and coordinate the person-centered plan and services. A live-in house parent/manager will manage day to day operations of the program and supervise direct staff who will provide the hands on daily support and training. Other professional staff will include nursing staff to support with health care needs, an activity/volunteer coordinator that will organize activities and develop new partnerships with the community for volunteer participation and community activity opportunities, resident finances to ensure proper spending of funds and maintenance of benefits, and maintenance staff to ensure proper operation of equipment, landscaping, and timely repairs.

A community center will provide individuals with daily opportunities to socialize, make new friends and participate with others through playing video games, classes (exercise, dance etc.), and just “hang out.” The general public will be welcomed at the village to interact and participate in activities with individuals, and make friendships.

Betty’s Village will be built with a traditional Tuscan design and accommodate the individual needs of each resident through a continuum of care provided in the various living models. Each

residence will be “home” for its residents. Meals will be prepared in each home, meet all requirements for nutrition and special diets and served family style. Staff will eat with the individuals and promote conversation and appropriate table manners. All homes will have an open floor plan with common living and dining areas that are tastefully decorated. Areas for visiting with family and friends will be available in each home. Every resident will have a private bedroom with in-suite bath that can be decorated according to their own style. Outdoor living areas will include comfortable covered patios with outdoor seating for visiting with family and friends, areas for exercise, sports, water play, hobbies, and BBQs. The Village will have advanced security and technology features that will create a safe not locked environment to enhance safety and independence.

Opportunity Village demands that each individual be treated with dignity and respect and be free from coercion and restraint and protected from abuse, neglect and exploitation at all times. Staff will be trained in non-violent physical crisis intervention using the Crisis Prevention Institute training. Staff will use positive behavior supports to de-escalate individuals engaging in inappropriate behavior by following written behavior programs that use a progressive prompting sequence to de-escalate inappropriate behavior. Staff will use positive reinforcement to reward appropriate behavior and use positive behavior supports for instances of inappropriate behavior. All behavior programming will include a teaching component and redirection. Staff will only use restraint procedures if the individual is a danger to him/herself or others and follow the person-centered plan approved emergency crisis procedure. All medication used to assist with behavior management will be monitored closely by the prescribing physician. Any use of medications or any restrictive component in a behavior plan will be approved by the Human Rights/Behavior Intervention Committee annually.

Every individual will be assessed and evaluated for health concerns initially and annually. Individuals will receive coordinated medical services from a primary physician of their choice. Nursing staff will provide nursing supports and follow up services. A medical management system will ensure that all medical needs are met. OV staff will be trained on the health care support needs of each individual and continuously monitor individuals for signs and symptoms of health issues. OV staff will support individuals to schedule and attend all medical appointments. Staff will ensure that all information from the appointment is documented and filed. Communication following each appointment will take place with family members, guardians and all appropriate individuals. Individuals taking routine medication will be evaluated on their ability to self-medicate. Individuals that are unable to self-medicate will have their medications administered by staff that is certified through a State of Nevada Division of Aging and Disability Services approved medication administration training curriculum. Opportunity Village will ensure that all protected health information is safeguarded.

Each individual’s human rights will be upheld and respected by ensuring that staff is trained, and knowledgeable about individual rights, educating individuals about their rights, and providing opportunities to exercise their rights and make choices responsibly. Each month staff will document a “right” that was trained and discussed with the individuals. Individuals may have some rights restricted depending on their abilities and guardian instruction. All rights restrictions will be approved by the guardian and ISP team and documented in the annual person centered plan. If a right is restricted without due process a Denial of Rights form will be completed and

submitted. All individual rights and restrictions will be reviewed annually by a Human Rights and Behavior Intervention Committee.

The Village will be staffed according to the individual's needs and supports as identified through the admission process, person-centered plan, and on-going evaluation. Through careful screening and hiring practices, continuing education, initial and on-going staff training, Opportunity Village will ensure that each staff member is well qualified, meets the requirements of the job, and is competent to implement the person-centered plan (PCP) and to support the resident's needs, routines and schedules. All staff will be very knowledgeable about each resident's likes, dislikes, and health and warning signs to identify signs of possible concern before they become a major issue.

The person-centered plan (PCP) is the blueprint for programming for each individual. The PCP process will address each person's array of home and community needs based on personal goals, preferences, community and family supports, financial resources, staff evaluation, and other areas important to the person. The PCP will facilitate individual choice regarding services and supports and who provides them. The PCP optimizes individual initiative, autonomy, and independence in making life choices. The individual receiving services will direct the PCP team and process to the maximum extent possible. The person may designate an advocate to assist them with the development of the plan. The PCP will provide services to be delivered in a manner that promotes/supports community integration to the extent of the individuals' preferences and desired outcomes. The PCP will assist each person with constructing and articulating a vision for the future, while considering various paths, engaging in decision making and problem solving, monitoring progress, and making needed adjustments to goals in a timely manner. The team will assist to identify a unique mix of paid and natural community supports that will help the person to meet progress toward accomplishing their goals. The PCP process will conduct frequent, ongoing assessment of the individual's needs and identify the individual's strengths, goals, preferences, needs (medical, daily living skills and home/community), and desired outcomes. Monthly data on programs, goals, and objectives will be taken, reviewed and summarized. The PCP will be updated on an annual basis however; the person may request a meeting to update the PCP at any time.

Opportunity Village will ensure full community integration and enjoyment of community life through planned activities in the community, intentional neighbors, and use of volunteer groups, family members and friends. Opportunity Village recognizes the importance of family in each resident's life and will make routine family involvement and interactions an expectation and priority. The Activity/Volunteer coordinator will create a monthly calendar of events that individuals can participate in during the month. Activities will be held in and outside of the village and the number of participants will vary according to the activity. Individuals may add individual activities to the calendar and participate in unplanned spontaneous outings of their choice. Some activities may include but not be limited to: shopping, special community events, concerts, plays, dining out, sporting events, church, and volunteer projects. During all activities, each resident will have opportunities to spend their money and learn money management skills in the process. Residents will be interacting with members of the community on all activities and at community businesses that they frequent. Other community participation may come through programs like Best Buddies that will provide one on one activity. Staff will engage the

individuals in hobbies of interest, interactive activities and community gatherings to celebrate holidays, birthdays and special events. Opportunity Village will promote personal choice for each person to choose their daily routines including times they want to eat and when to have visitors. Opportunity Village respects the individual's right to refuse to participate, however, staff will continue to provide opportunities and encouragement to the individual to participate. Individuals will access the community through public transportation, parents, family members, and company vans. Opportunity Village will provide vacation opportunities for residents to places of interest following the individual's desires and documented in the person centered plans.

Betty's Village will be culturally-responsive and inclusive. Opportunity Village will support the culture and beliefs of the individual to attend or not attend religious services, observing specific food preferences or dietary restrictions related to culture or ethnicity, and celebration of holidays and special events.

Betty's Village will be flexible and nimble in its service system to move and react quickly and address emerging needs of each individual and their family. Opportunity Village desires each individual, their family members and interested parties to be satisfied with their support services. OV residential staff will regularly discuss services and satisfaction with individuals and family members. If a problem exists, individuals and their families have the ability to meet at any time with OV administrative staff to discuss issues. Families can complete a satisfaction survey annually and may communicate at the annual person-centered planning meeting.

Opportunity Village will maintain and develop a wide range of community stakeholders to offer support networks to the individuals. Visitors and volunteers to Betty's Village will spend "meaningful time" interacting and socializing with the individuals. Service clubs such as Rotary, Lions club and Boy Scouts will be invited to volunteer and spend a night with individuals watching movies, playing games and other community based activities. Opportunity Village supports four (4) Miracle League Baseball teams that provide one non-disabled player to each disabled player. Opportunity Village will invite groups and clubs to speak to the individuals about their organization with the possibility that the individual can become a member of their organization. Opportunity Village will reach out to faith based communities so individuals have a chance to participate in their activities. The Opportunity Village grandparent program will match active seniors and individuals to develop friendships and participate in community activities such as art, theatre and dance. The Activity/Volunteer coordinator will perform community outreach to develop new corporate volunteer groups that will support the individuals in enrichment classes such as cooking, art, crafts, exercise, yoga and community activities. Individuals will have opportunities to participate in community volunteer projects to benefit other community organizations.

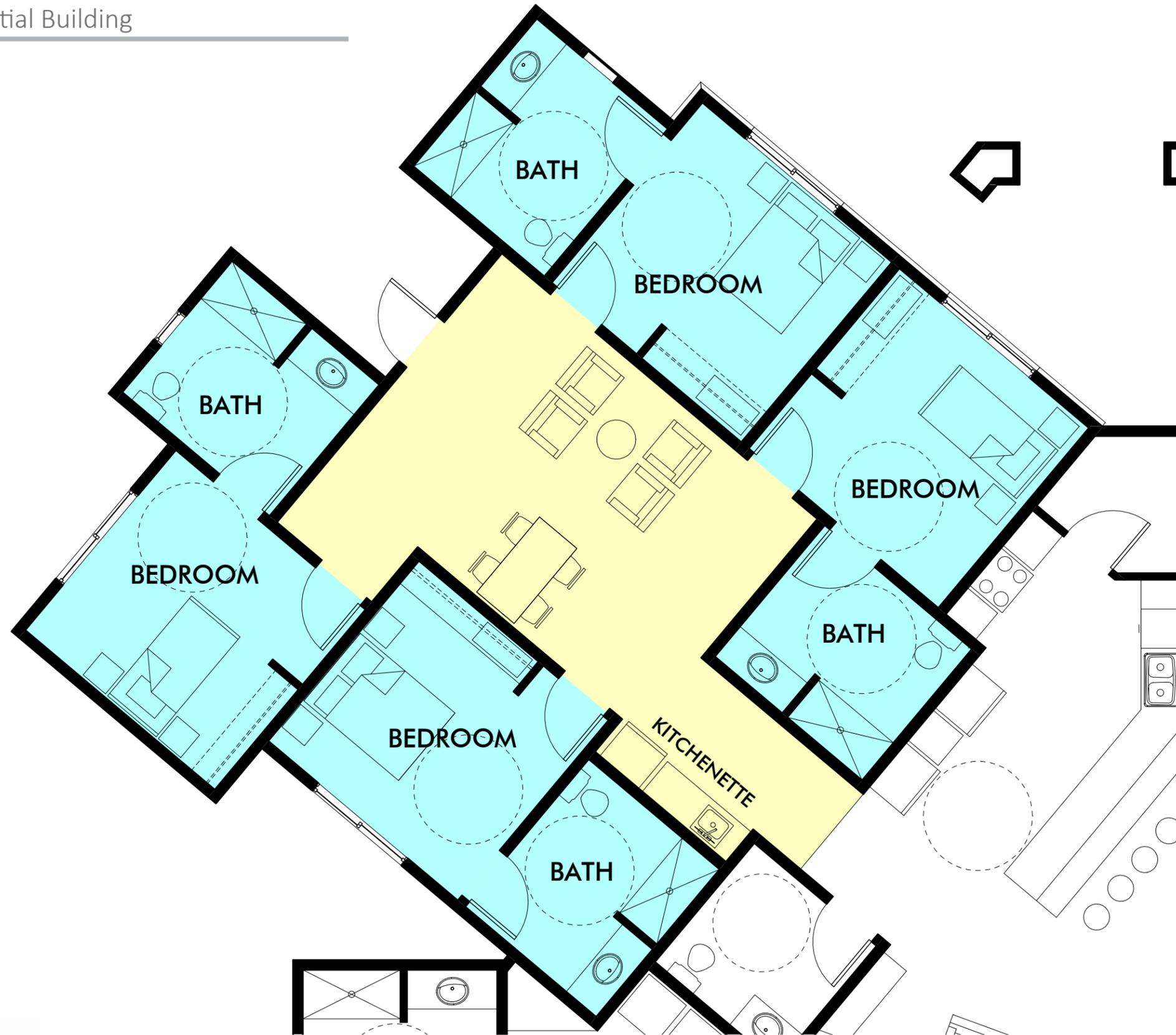
Opportunity Village is committed to enhancing the lives of people with intellectual disabilities and their families. Through respect, fiscal responsibility, team building and professional, high quality services residents will fulfil their dreams and live a high quality of life.



# Central Area



# Pod 1 4 Rooms



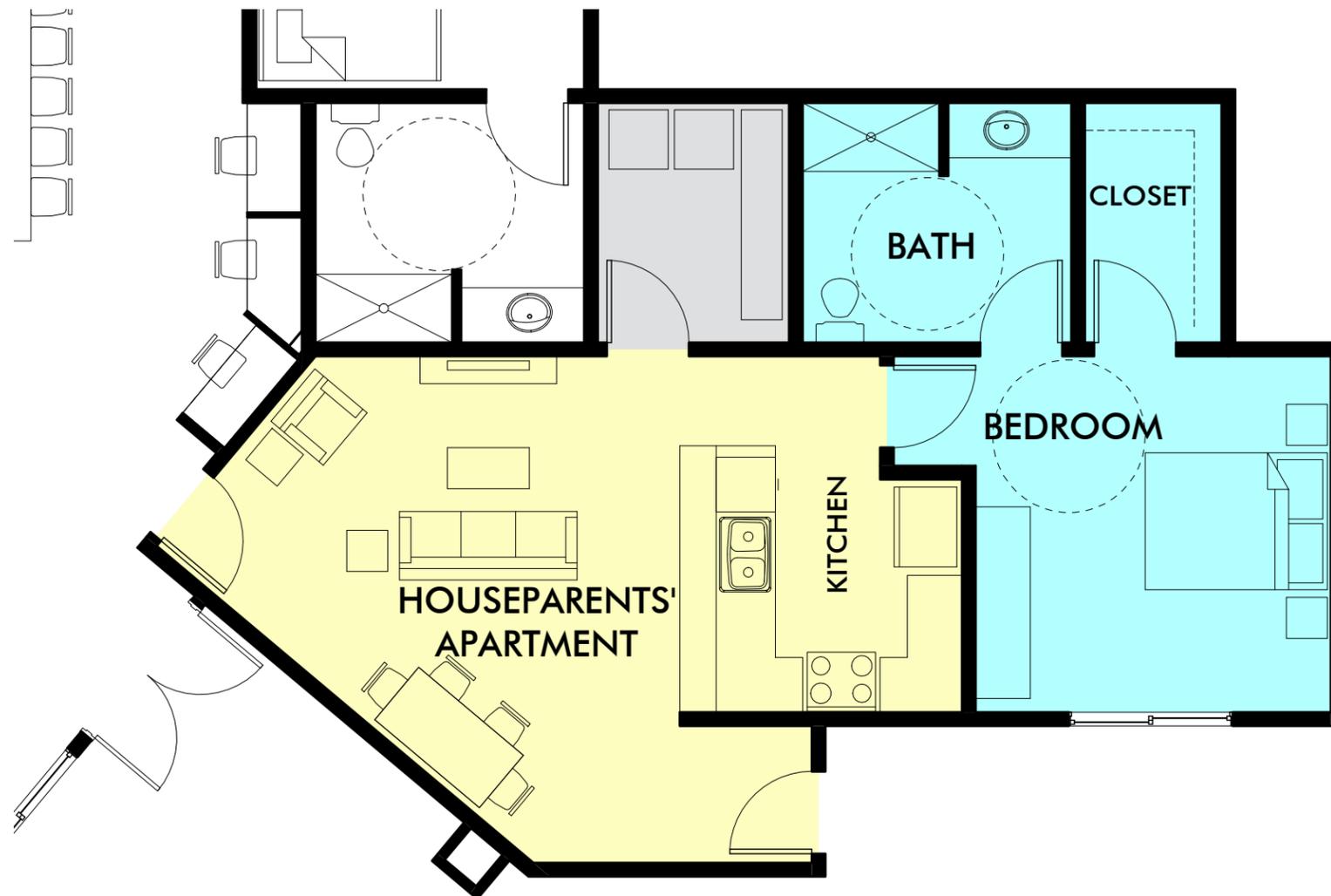
# Pod 2 4 Rooms



# Pod 3 4 Rooms



# Houseparents' Apartment



# First Floor



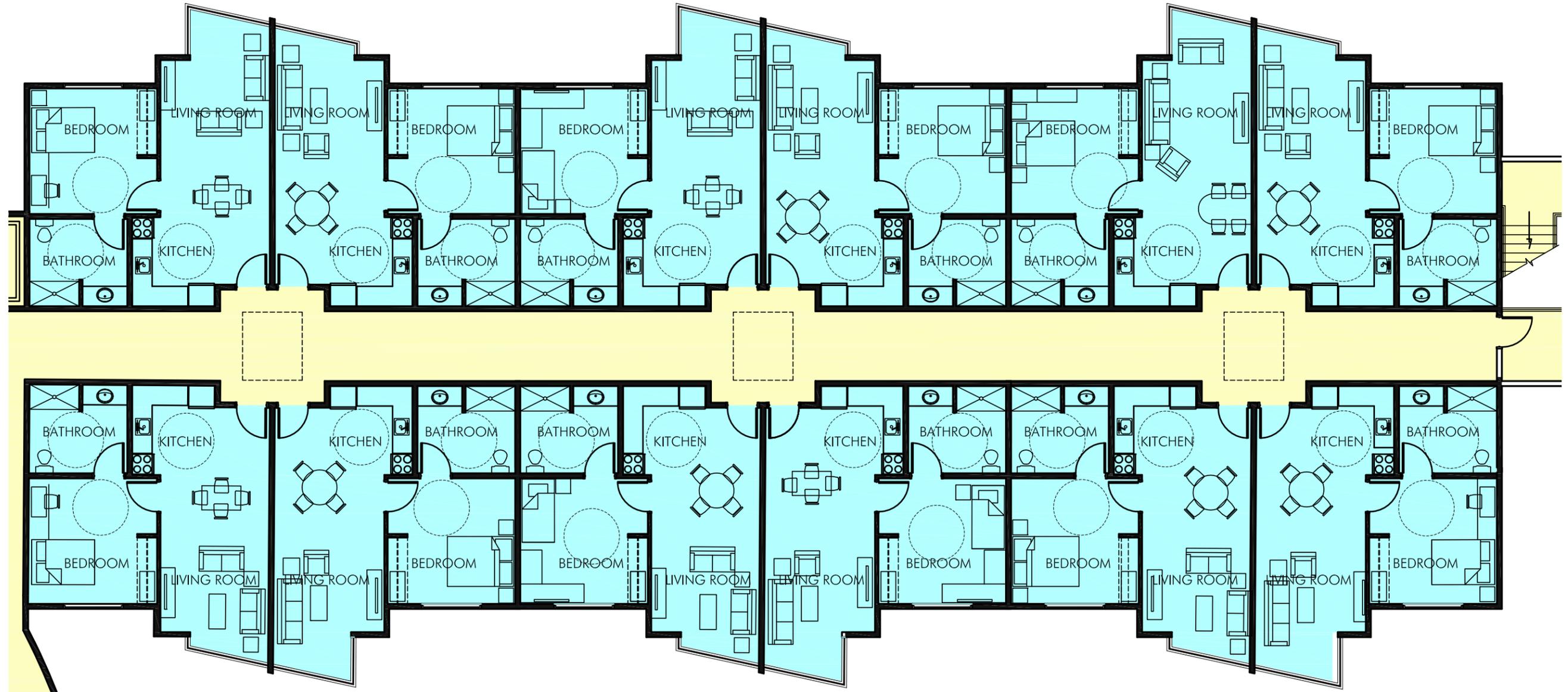
<b>FIRST FLOOR:</b>	<b>21,968 SF</b>
<b>TOTAL:</b>	<b>41,142 SF</b>
<ul style="list-style-type: none"> <li>• 17 One-Bedroom Apartments</li> <li>• 14 Studio Apartments</li> </ul>	

# Second Floor

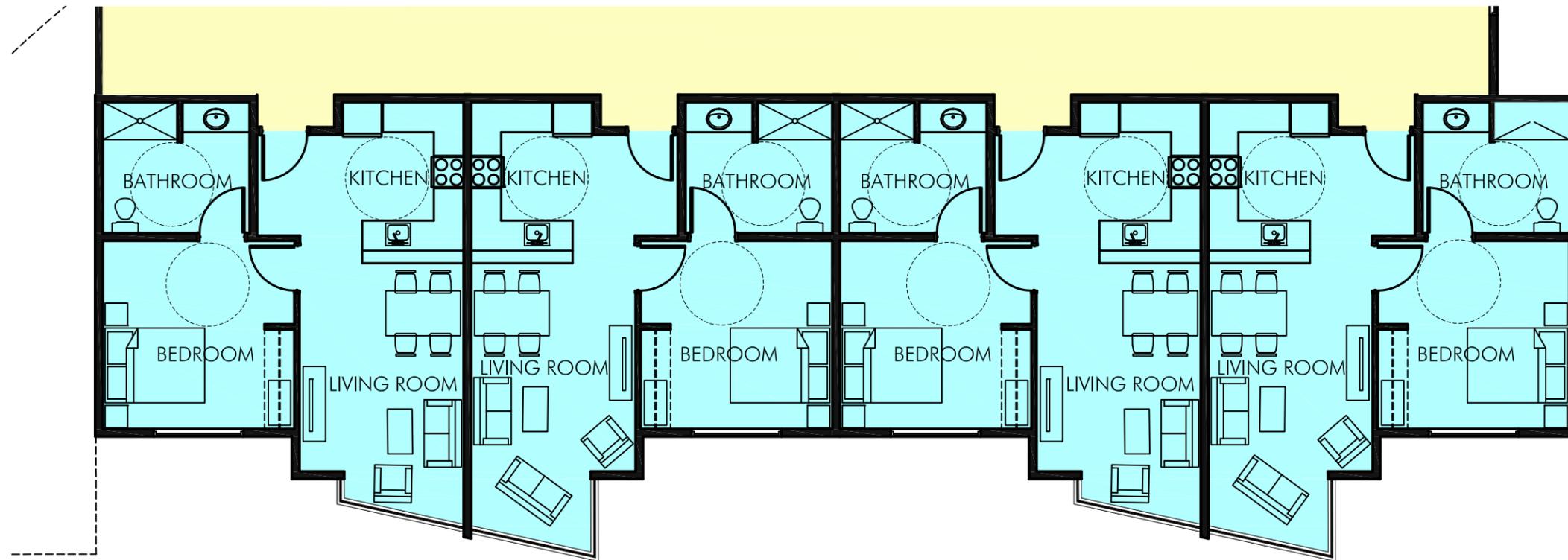


<b>SECOND FLOOR:</b>	<b>19,174 SF</b>
<b>TOTAL:</b>	<b>41,142 SF</b>
<ul style="list-style-type: none"><li>• 17 One-Bedroom Apartments</li><li>• 14 Studio Apartments</li></ul>	

# North Wing



# West Wing



# South Wing

