



DELAWARE HEALTH AND SOCIAL SERVICES

Division of Medicaid & Medical Assistance

Delaware Request for Heightened Scrutiny Review: Gilpin Hall Adult Day Program

Introduction

Delaware is submitting one home and community-based (HCB) setting, Gilpin Hall Adult Day Program (Gilpin Hall) for CMS' heightened scrutiny review. Gilpin Hall is a provider of adult day services to 31 HCBS participants. The facility is located at 1101 Gilpin Avenue, Wilmington, Delaware, 19806.

DMMA offers the following narrative and five attachments to support this request:

- Attachment 1: Gilpin Hall report card from onsite assessment
- Attachment 2: Aggregate summary of participant survey results
- Attachment 3: Mission statement
- Attachment 4: Licenses
- Attachment 5: Maps indicating Gilpin Hall's proximity to community resources

Background

On March 1, 2016, DMMA staff conducted an onsite assessment of Gilpin Hall. The focus of the review was to validate the findings of Gilpin Hall's provider self-assessment and the participant surveys. (Please refer to the March 30, 2016, update to the Plan for details regarding the DSHP provider self-assessment and participant survey process.)

The assessment revealed that while the setting is located on the grounds of a nursing home, the setting is located in close proximity to private residences and is within one mile of numerous retail businesses and therefore is not physically isolated from the broader community. However, the assessment also revealed that, in general, participants did not appear to have the opportunity to engage in community activities outside of the facility. We refer you to information in the following section of this request and to Gilpin Hall's onsite assessment report (Attachment 1) for the complete results of the assessment.

As a result of the findings from the onsite assessment, DMMA determined that the setting does not pass the State's heightened scrutiny review. On September 24, 2016 DMMA's Director, Deputy Director and other staff met with CMS representatives to discuss the status of Gilpin Hall as an HCB setting. CMS asked DMMA to submit Gilpin Hall for CMS' heightened scrutiny review process.

Results of DMMA's Assessment of Gilpin Hall

Gilpin Hall was established in 1824 and is focused on enhancing the quality of life for elderly people by providing a secure and caring environment in a family setting within the context of the larger community (Attachment 3). Gilpin Hall serves individual between the ages of 50-93; the average age is 74. More than one half of the participants have a primary diagnosis of dementia. Other diagnoses include Cerebral Palsy, Hemiplegia, Parkinson's Disease, Diabetes Mellitus, COPD, Epilepsy, and S/P CVA.

HCBS participants receiving services at Gilpin Hall completed a participant survey. The results of the survey indicated high participant scores (greater than 80%) in the areas of:

- Choice of setting
- Characteristics of the setting
- Staff interactions and policy
- Services and support

The lowest aggregate score, 79.5%, was in the area of community access and integration.

Additional information regarding Gilpin Hall's aggregate participant scores can be found in Attachment 2. Please refer to the March 30, 2016, update to the Plan for details regarding the participant survey instrument.

As mentioned above, DMMA's onsite assessment of Gilpin Hall revealed that the setting where HCBS participants receive services is located in the building of the Gilpin Hall nursing home. However, the setting has a separate, independent license as an adult day care program (Attachment 4). Additionally, staff at the setting (including registered nurses, licensed practical nurses, certified nurse assistants and the Activity Director) provides HCBS separately from the nursing home residents. Registered nurses, licensed practical nurses, certified nurse assistants and the Activity Director are employed exclusively for the adult day program.

The setting is located immediately across from a residential neighborhood and is less than one mile from several retail businesses. The following community resources are available within approximately a five mile radius of the setting (Attachment 5):

1. Local Stores and Businesses
 - Trolley Square
 - CVS Pharmacy
 - Very Near Yoga Studio
 - Shell Minimarket and Gas Station
 - Delaware Children's Theater
 - OSI Dialysis
2. Schools
 - Wilmington Friends School
 - Salesianum School
 - Tower Hill School
 - Odyssey Charter School
 - St. Ann School
3. Public Transportation
 - Wilmington Train Station
 - DART Transportation

4. Private Residences

- Mayfair Apartments
- Park Plaza Condominiums
- Dorset Condominiums
- Richards Alley Homes
- Private Individual Homes on Shallcross Avenue, N Van Buren Street, and N Harrison Street

However, during the onsite review, the survey team noted that although community resources are available, participants had limited opportunities to participate in activities outside of the setting.

Moving Towards Compliance

As noted above, DMMA's assessment process revealed gaps in Gilpin Hall's current compliance with federal requirements of HCB settings. Following the participant survey, provider self-assessment, and onsite assessment, DMMA's Director and Deputy Director personally visited Gilpin Hall on September 19, 2016. This follow-up visit was important to confirm that with modifications Gilpin Hall could be an appropriate HCB setting.

We recognize that the identified non-compliant issues will need to be addressed in order for Gilpin Hall to be a fully compliant HCB provider setting. Gilpin Hall is committed to putting the necessary measures in place to continue providing HCBS. Furthermore, DMMA is committed to working with the setting to establish the appropriate milestones and timeframes appropriate to demonstrate compliance by March 19, 2019.

DMMA will require Gilpin Hall to develop and submit for approval a corrective action plan (CAP). This approach is consistent with that used for all providers with identified non-compliant issues. The CAP will need to provide sufficient details regarding:

- The specific non-compliant issue(s).
- Corrective actions to be taken to ameliorate the non-compliant issue.
- Dates by which the actions will be taken and the person(s) responsible for each action.
- The strategy that will be employed to monitor progress toward compliance.

As noted above, one issue that Gilpin Hall will need to address is increasing opportunities for participants to integrate into the community. For Gilpin Hall, this will likely require a "reset" regarding the operational model and approach to providing HCBS for their participants.

Consequently, the CAP will need to demonstrate the measures that Gilpin Hall will put in place to realize this transition. At a minimum, we would expect the following areas to be addressed in the CAP:

- Training and education for all existing staff on HCBS requirements and working with individuals with dementia;
- Development of a curriculum for initial training for new staff and ongoing refresher training;

- Development of appropriate policies and procedures, including but not limited to the following areas: person-centered planning process and the role of the participant, development of person-centered plans of care; and participant access to community activities and services; and
- Strategies to measure effectiveness of interventions.

DMMA welcomes CMS guidance regarding additional issues to address to ensure an appropriate CAP.

Once approved, DMMA will regularly monitor implementation of the CAP. Gilpin Hall will provide monthly updates regarding the status of implementation until the CAP is fully implemented and all issues are addressed. As needed, technical assistance and support will be provided to facilitate compliance. Once approved, like all HCB settings, Gilpin Hall will be subject to ongoing monitoring to ensure that the setting continues to meet all applicable requirements.

Attachment 1 – Gilpin Hall report card from onsite assessment



ADS Gilpin.pdf

Attachment 2 – Aggregate summary of participant survey results



Gilpin Hall ADS
Survey Summary.pdf

Attachment 3 – Mission Statement

Gilpin Hall Adult Day Program Mission Statement

Gilpin Hall's Adult Day Program was established to provide a safe, dependable, stimulating and enjoyable environment, in which participants of the program and their families can experience an improved quality of life.

Attachment 4 – Licenses



Adult Day Care
License



Skilled Nursing
Facility License



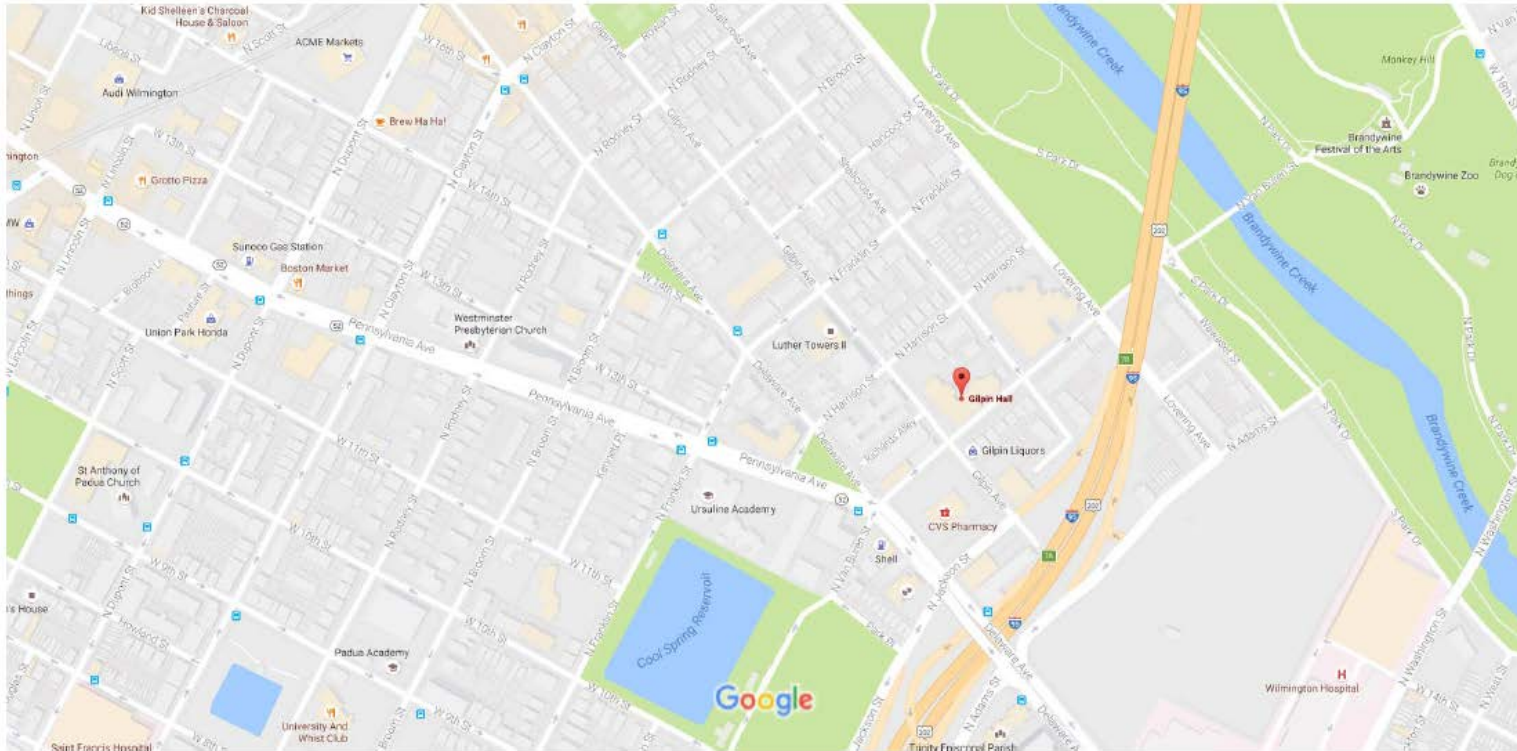
Residential Care
Facility License

Attachment 5 – Maps indicating proximity to community resources

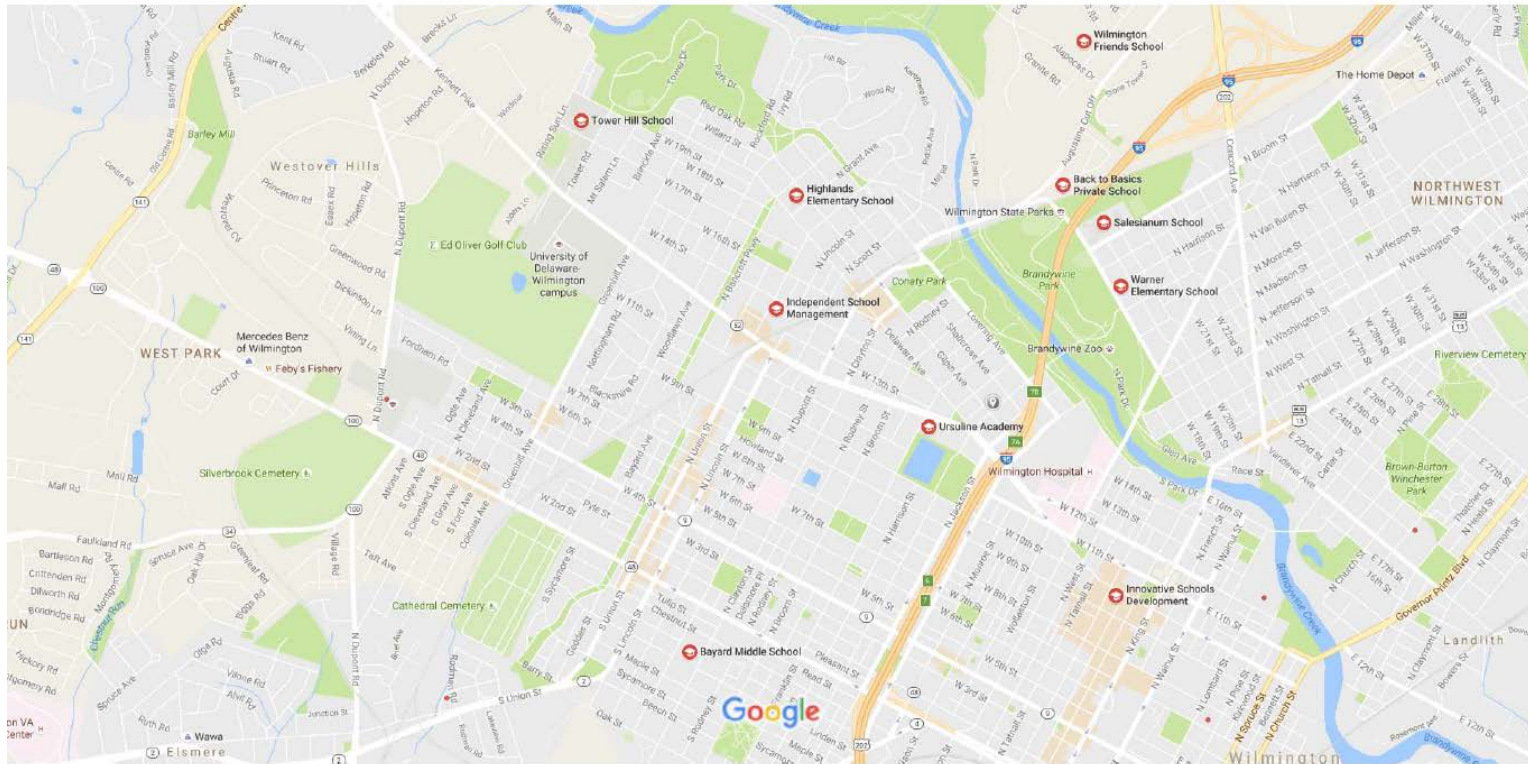
Gilpin Hall Adult Day Program and Surrounding Area



Gilpin Hall Surrounding Businesses and Public Transportation



Gilpin Hall Surrounding Schools



Gilpin Hall Surrounding Private Residences

