

Clarification Regarding Community Integration for Managed Long Term Care (MLTC) Plans and Social Adult Day Care (SADC) Sites

Dear MLTC Plan Administrators,

Please share with staff as appropriate

The New York State (NYS) Department of Health (DOH) would like to provide clarification on Home and Community Based Services (HCBS) Final Rule community integration guidelines, standard 42 CFR 441.301(c)(4)(i) of the Final Rule, for your MLTC plan to share with SADC sites and ensure compliance. The information below is based on guidance from the Centers for Medicare and Medicaid Services (CMS) that has been provided (see resources & references below).

42 CFR 441.301(c)(4)(i): 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.

- **What is community integration?**
 - Community integration must be person-centered, enhance independence, and provide opportunities for meaningful engagement in community life.
 - These activities must also fit within the framework established by each individual's Person-Centered Service Plan (PCSP) and achieve the goals set forth in their PCSP.
- **What is NOT community integration?**
 - Off-site group activities without individual integration into the broader community.
 - Employment/volunteer work is not being "on the job" or "at work" when referring to attendance at agency-funded day programs or sheltered workshops.
 - Programs involving activities such as dances, parties, or holiday events which are restricted to individuals with disabilities who reside on campus or attend the provider agency's programs.
 - Group trips and activities rather than individual opportunities for meaningful engagement in community life. Example: Community integration are personalized activities that a member chooses to do to be engaged in the community and based on their own goals identified in the member's PCSP process.
- **How can SADCs connect with the community in resourceful ways?**
 - Build relationships with local businesses to create and reinforce inclusion on all fronts: social, recreational, employment.
 - Link an individual's unique interests with potential community connections; use these connections to inform choice.
 - Assist individuals to build upon their existing networks to develop natural supports.
 - Ensure that community activities are fluid, not "shift" dependent; are a natural outgrowth of interests identified in the PCSP and not just time-fillers.
 - Avoid siloing information. Share information about options (bulletin board, announcements, newsletter, etc.).
 - Capitalize on staff's knowledge of the community to open new doors to inclusion.

- Incentivize staff through training, team building, and performance planning to provide the opportunity to enhance staff skills around developing strong community connections.
- Recruit staff with different qualifications/less traditional backgrounds to help expand community integration activities/focus.

Resources & References:

- Themes Identified During CMS' Heightened Scrutiny Site Visits - November 2022
 - [Slides](#) (*slides 16-18 focus on Community Integration*)
 - [Webinar Video](#)
- [Assisting Providers in Ensuring Settings Facilitate Community Inclusion](#) - March 2018

Please contact HCBSSADCSiteAssessments@health.ny.gov with any questions.

Thank you,

NYS DOH
Bureau of Managed Long Term Care (BMLTC)
BMLTC Surveillance Unit
Social Adult Day Care (SADC) Compliance Team