

SADC HCBS Compliance Community Integration

The purpose of this document is to provide Social Adult Day Care (SADC) providers with guidance related to community integration requirements, which is an integral part of the Centers for Medicare and Medicaid (CMS) [Home and Community Based Services \(HCBS\) Settings Final Rule](#). SADCs should ensure their policies and procedures are aligned with the guidance provided.

SADCs should reach out to their contracted Managed Long Term Care (MLTC) plans to discuss any questions they may have about compliance with the HCBS Settings Final Rule and community integration.

HCBS Standard and Definition of Community Integration

Corresponding HCBS Final Rule Standard

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.

Why is Community Integration important?

The goal of Community Integration is to help a member develop, maintain, and grow relationships and networks within their community, resulting in decreased loneliness, establishment of better support networks, and leading to overall better health.

What is Community Integration?

Community Integration IS:

- Community Integration arises from the person-centered planning (PCP) process when discussing the member's goal and interests. This results in individualized activities relevant specifically to that member, which integrate them with their community and that are aligned with their goals and interests.
- ALL members regardless of their health and/or safety needs are:
 - Offered opportunities to integrate with their community.
 - Free to pursue their interest and goals via integration with their community.
- Supported by the SADC to participate in community integration activities. Per the December 2019 CMS presentation [Assisting Providers in Ensuring Settings Facilitate Community Inclusion](#), slides nineteen through twenty-three (19-23) CMS informs:
 - 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.

Community Integration is NOT:

- A group or individual "outing" with only SADC staff and members in attendance.
- Group or individual trips and activities that are not aligned with an individual's PCSP for

meaningful engagement in community life.

- Community members coming into the SADC to present, perform, educate, etc. for the members at the SADC.
- An individual or group “outing” to only perform instrumental activities of daily living (IADLs) such as attending medical or hair and nail appointments, shopping, or laundering clothing.
- SADC activities such as dances, parties, or holiday events which are restricted to individuals who attend the SADC and staff.

Community Integration Requirements for SADCs

What is meant by “support” in relation to Community Integration? What is required of the SADC?

- “Support” is working to help the member to attend individualized activities within the community. This includes ensuring that any health and/or safety needs are addressed and assisting the member where possible and appropriate.
- The SADC can support members’ community integration efforts by ensuring they are aware of their right to leave the site independently and encouraging them to consider community integration options to meet their goals.
- Typically, “support” will involve coordination for the member to attend their chosen activity. Examples include but are not limited to:
 - Arranging transportation for the member or helping the member to request transportation.
 - If the member cannot attend their selected community activity alone, arranging with guardians, caretaker, aide, etc. for someone to attend with the member.
 - Helping a member register or sign-up for an activity.
 - Reminding a member about a chosen activity when it is time to leave and assisting them in preparing to leave.
 - Assisting the member, if needed, in changing to or out of appropriate attire for the chosen activity.

SADCs are NOT responsible for, but may choose to perform the following to better support members in integrating with their communities:

- Accompanying members to Community Integration activities.
- Providing transportation to and from Community Integration activities.

How can SADCs connect with the community in resourceful ways?

How can SADCs connect with the community in resourceful ways?

Per the December 2019 CMS presentation [Assisting Providers in Ensuring Settings Facilitate Community Inclusion](#), SADC and all providers are encouraged to:

- Build relationships with local businesses to create and reinforce inclusion on all fronts: social, recreational, employment.
- Link an individual’s unique interests (use the member’s PCSP) 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.

Community Integration in the Person Centered Service Plan (PCSP)

Community integration is an essential part of the PCP process and therefore, SADCs should do the following to ensure community integration is documented in the PCSP and that the process was appropriately followed:

UTILIZE the PCP process to elicit and document input from the member regarding their goals and interests related to community activities.

OFFER the member choices or ideas for community integration activities that align with their goals and interests. Discuss and share with the member different opportunities that are available in the area which align with their goals and interests.

LISTEN to the member’s goals and interests related to community activities and offers made, including inquiring about activities that were not offered and listening to the member’s reply and thoughts on what they value.

COORDINATE or provide any necessary support(s) so that members can participate in their chosen community activities and meet their goals.

DOCUMENT all community integration activities that are offered to the member or discussed during the PCP process, including offers that are not chosen. Include any required supports and describe how they will be provided or coordinated for the member.

Resources

- 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)
- [Person-Centered Planning and Practice Resource Library](#) (June 2024)