STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:	(X2) MULTIPLE CONSTRUCTION	(X3) DATE SURVEY COMPLETED
	0020036	A. BUILDING: _____ B. WING _____	C 11/19/2025

NAME OF PROVIDER OR SUPPLIER	STREET ADDRESS, CITY, STATE, ZIP CODE
FREEDOM GROUP HOME LLC II	3349 CLOVE DR MADISON, WI 53704

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M 000	INITIAL COMMENTS On 11/13/2025, with information gathered through 11/19/2025, Surveyor conducted a complaint investigation. One deficiency was identified. Complaint was substantiated. Census: 4	M 000		
M 556	88.10(3)(e) Self-Direction Self-direction. To have opportunities to make decisions relating to care, activities and other aspects of life in the adult family home. No curfew, rule or other restrictions on a resident's freedom of choice shall be imposed unless specifically identified in the home's program statement or the resident's individual service plan. An adult family home shall help any resident who expresses a preference for more independent living to contact any agency needed to arrange it. This Rule is not met as evidenced by: Based on observation, record review and interview, the provider did not ensure the right to freedom of choice for 2 of 2 residents in the home. Resident 1's and Resident 2's bedroom windows contained bars on the outside to deter them from eloping. Findings include: On 10/17/2025, the Department received a	M 556		

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE | TITLE | (X6) DATE

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M 556	Continued From page 1	M 556		

concern alleging that residents were restricted due to bars being placed on the bedroom windows.

On 11/13/2025, at approximately 3:00 PM, Surveyor and Licensee A toured the home and observed heavy black metal bars placed on the exterior side of Resident 1's and Resident 2's bedroom windows. Surveyor asked for clarification on the rationale for the placement of the bars. Licensee A stated that Resident 1's and Resident 2's care team and guardians requested that the bars be placed on the windows due to them being elopement risks.

On 11/13/2025, Surveyor reviewed Resident 1's and Resident 2's record.

Example 1: Resident 1

Resident 1 moved into the home, 11/10/2025, and was represented by Guardian B and managed care organization (MCO) Case Manager (CM) C.

Resident 1's record contained a MCO "Behavior Support Plan (BSP)," dated 11/05/2025, which documented:
"Member does not like to be in a locked setting and feels as though [s/he] is in prison."
"Noteworthy Behavioral Consideration & Factors: Elopement. Monitor [Resident 1] while [s/he] moves through the facility."
"Home Environment: Line of sight at all times. 15 minute checks due to eloping or wanting to enter other rooms to see if [s/he] could elope."
"Does the Individual have a Restrictive Measure or Client Rights limitation? No"
"Is there a Restrictive Rights approval? No"

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M 556	Continued From page 2	M 556		

On 11/17/2025, Surveyor reviewed Resident 1's MCO "Member Centered Plan (MCP)," dated 11/01/2025, provided by his/her MCO provider which documented:
"Member wanders day and night. Verbal redirection, window/door guards, wander guard bracelet, outside cameras for monitoring, and safety checks provide interventions for member safety."
"Restrictive Measures: State Approved Restrictive Measures: No"

On 11/19/2025 at 7:06 AM, Surveyor emailed Resident 1's MCO CM C and asked for clarification if Resident 1 required a restrictive measure that included bars on his/her bedroom windows.

On 11/19/2025 at 7:53 PM, Surveyor emailed Licensee A and stated his/her consensus of his/her review of Resident 1's documentation that stated Resident 1 did not have any approved restrictive measures.

On 11/19/2025 at 9:01 AM, Licensee A emailed Surveyor and stated, "Thank you for the clarification. I'm planning to meet with the member guardians and will address all the restrictive measures and share the outcome as soon as possible."

On 11/19/2025, Surveyor reviewed the provider's department file to determine if a resident rights' waiver had been submitted and approved. The file did not contain any waiver submittals.

On 11/19/2025 at 11:00 AM, MCO CM C emailed Surveyor and stated, "Thank you so much for providing the photo and that additional information. From the vantage point of this being

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a fire hazard especially, I definitely understand the rationale of this being considered a restrictive measure from DHS (Department of Health Services). I am forwarding the photo documentation to my supervisor along with this information for review. In light of this, I anticipate that we will request the bars be removed and utilize window alarms instead, if guardian is also in agreement."

Example 2: Resident 2

Resident 2 moved into the home, 11/10/2025, and was represented by Guardian D and MCO CM E.

Resident 2's "Individualized Service Plan," dated 09/01/2025, documented:
"Behavioral Intervention: [Resident 2] does not have a behavior that requires serious intervention. However, [s/he] does require continuous redirection and cue at all times."
"Environmental Modifications: Door alarms on major exit points in case [s/he] attempts to leave the environment. [S/he] is easily redirected verbally if found to be wandering away from the residence."
"Window should be closed and locked at night when [Resident 2] goes to sleep for [his/her] safety."
"Insight of the staff at all times."

On 11/17/2025, Surveyor reviewed Resident 2's MCO MCP, dated 07/01/2025, provided by his/her MCO provider which documented:
"Member will reside in the least restrictive environment in the next 6 months."
"Behaviors Requiring Intervention: Recent wandering at day program, member has a wander guard."

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M 556	Continued From page 4 "Restrictive Measures: State Approved Restrictive Measures: No" On 11/19/2025, Surveyor reviewed the provider's department file to determine if a resident rights' waiver had been submitted and approved. The file did not contain any waiver submittals. On 11/19/2025 at 7:08 AM, Surveyor emailed Resident 2's MCO CM E and asked for clarification if Resident 2 required a restrictive measure that included bars on his/her bedroom windows. On 11/19/2025 at 9:01 AM, Licensee A emailed Surveyor and stated, "Thank you for the clarification. I'm planning to meet with the member guardians and will address all the restrictive measures and share the outcome as soon as possible." On 11/19/2025 at 9:03 AM, MCO CM E emailed Surveyor and stated, "Thank you for this information. I will be following up with the AFH (adult family home) right away." "In a Wisconsin adult family home, bars or grilles are permitted on bedroom windows provided they can be released or removed from the inside without the use of a key, tool, or excessive force. This requirement ensures that the window can still be used as a safe emergency escape and rescue opening during an emergency, such as a fire." (Source: ICC (International Residential Codes) website, 2015 INTERNATIONAL RESIDENTIAL CODES - SECTION R310 - EMERGENCY ESCAPE AND RESCUE OPENINGS, 2025, https://codes.iccsafe.org/s/IRC2015/chapter-3-building-planning/IRC2015-Pt03-Ch03-SecR310	M 556		

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