Training Material: Home and Community-Based Services (HCBS) Compliance Guidelines

Admission Process:

1. **Admission/Intake Checklist:**
   - Document that you have asked:
     1. Have you looked at other programs/homes?
     2. Is this the program/home you chose?
   - Use a matching tool for roommates and staff preferences.
   - Explain the trial process for someone interested in the program or home.

2. **Residential Agreement:**
   - Explain the guidelines for decorating bedrooms and common areas.
   - Have an open visitor policy without specified hours, notice, background checks, or approval.
   - Allow access to the kitchen and food at any time.
   - Note that there are locks on bedroom doors and explain the policy for lost keys.
   - Define how someone changes which staff supports them.
   - Explain the eviction and appeals policy and timelines.
   - Explain the restraint policy.
   - Explain how roommates are chosen and how someone can change rooms or roommates.
   - Explain the transportation support you provide.
   - Explain how residents can request accommodations or changes to the home.
   - Explain how you offer employment support.
   - Outline money policies with no restrictions for someone to use their own personal money.
   - Explain how someone can express they are not happy with the home, program, support, etc.
• Allow residents to drink alcohol unless a medical professional provides written documentation for a specific resident.
• Ensure that the residential agreement is a legally enforceable agreement that provides similar protections against potential eviction as those provided under landlord/tenant law.

3. **Daily Notes**:  
   • Document how you provide choices to each person and how you know their preferences.

4. **Staff Training**:  
   • Document HCBS staff training.

5. **Community Engagement**:  
   • Schedules and calendars must show community-based activities.
   • Offer daily community-based activities based on individual preferences.
   • Do not use activities as a punishment or reward.
   • Provide multiple transportation options.
   • Document resident requests in the daily notes.
   • Offer employment opportunities based on a person’s interest.

6. **Modifications**:  
   • Modifications are made based on team decisions, with input from behavior and/or medical experts.
   • Modifications must be reassessed or looked at with the team every three – six months.
   • Document attempts of less restrictive options.
   • Include modifications in Individual Service Plans (ISP) and Individual Program Plans (IPP).

7. **Privacy**:  
   • Use cameras/video surveillance only outside or justified in common areas with resident permission.
   • Install locks on bedroom and bathroom doors with only appropriate staff having keys to doors. Bedroom doors should be lockable from the inside and outside by the individual.
   • Conduct ISP, IPP, and other confidential meetings in private areas.
• Keep medical information private and confidential.
• Ensure space for private phone and in-person conversations.
• Avoid alarms on bedroom doors unless specified for health and safety.

8. **Accessibility:**

• Eliminate tripping hazards.
• Ensure doors, doorways, etc., are accessible for all residents.
• Provide accessible door entry buttons.
• Allow movement throughout the home and yard with minimal restrictions.

9. **Choice:**

• Promote choice in home, program, employment, daily schedule, roommate, staff, meals, and activities.
• Allow alternative meal options and flexibility for mealtimes.
• Encourage each person to control their schedules and activities and make sure schedules are flexible as the person desires.
• Ensure residents can access their belongings at any time without restrictions.
• Residents are not required to be out of the home during the day. They do not have to attend a day program.

10. **House Values:**

• Create house values or guidelines with residents.
• Think about what unspoken rules there might be and think about who they benefit. House guidelines and values should benefit the residents, not the staff.
• Do not have blanket restrictions.

HCBS Compliance:

To be in compliance with HCBS requirements, ensure the following:

1. **Partnerships and Community Access:**

• Establish partnerships with other providers and use available community resources.
• Use existing community transportation options.
• Develop policies for full community access.
2. **Restraints:**
   - Make sure your policies are in line with approved waivers.
   - Follow safeguard procedures to ensure there is not misuse of restraints or medication.

3. **Privacy and Dignity:**
   - Protect residents' rights.
   - Remove undignified wording from plans and documentation.

4. **Resident Choices:**
   - Ensure a choice of setting.
   - Protect residents' privacy, including during remote conversations and meetings.
   - Allow residents to decide who is allowed in their bedrooms.

5. **Training and Employment:**
   - Provide consistent and ongoing training on HCBS requirements.
   - Let all program participants or residents know that they have the choice for competitive employment working alongside people with and without disabilities.

6. **Financial Control:**
   - Allow individuals to control how they spend their money.

7. **Health Information and Privacy:**
   - Protect residents' health information.
   - Ensure private phone conversations.

8. **Modifications and Individual Needs:**
   - Make sure modifications are made based on individual assessments.
   - Document modifications in ISP and IPP.

9. **Meal Choices and Flexibility:**
   - Offer options and flexibility in meal choices and mealtimes.

10. **Community Integration:**
    - Use person-centered planning for each person to decide what they want to do in the community and with whom.
• Discourage practices not aligned with choice, such as court-ordered placements.

Remember, the principles of person-centered planning apply to all residents, including those with complex needs. Regular training and reinforcement of HCBS regulatory criteria are essential for maintaining compliance.