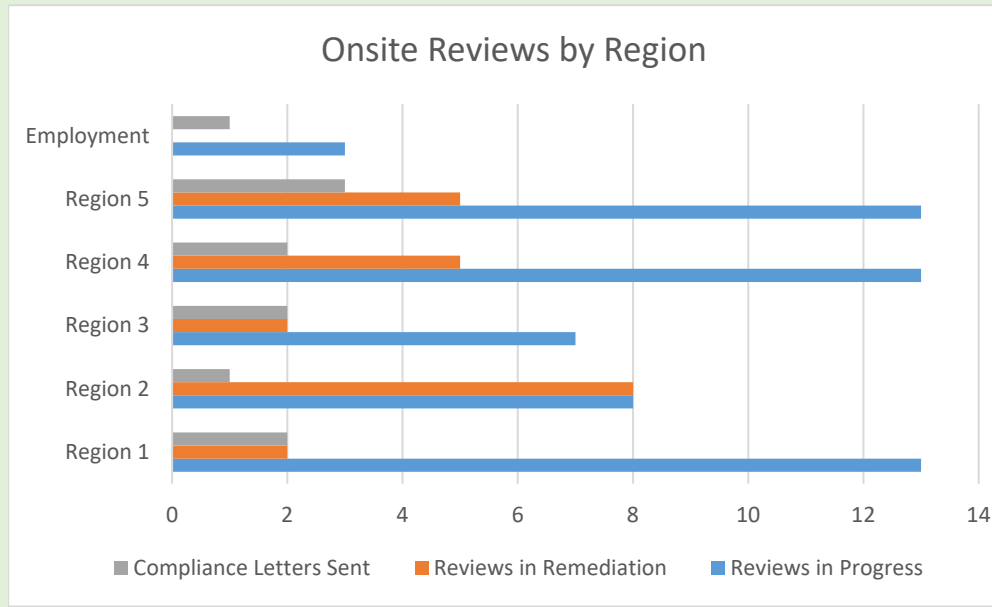


HCBS Validation Data

As of 3/19/2021, here is the breakdown of onsite reviews by region.



Reviews in progress: defined as a review that has started with a pre-call. Settings could be in the document upload phase of the review in this area.

Reviews in remediation: defined as a setting that has received an audit summary outlining the area of partial or non-compliance requiring remediation.

Audit Do's and Don'ts

DO-

- When you are contacted for a desk-audit, respond to the email from the state team within 2 business days with the selected contact person for your agency and the initials of the individuals who are receiving services in the setting. This email is sent securely from the state team.
- Upload all required documentation into Edoc by your assigned deadline.
- Do work with your review team if you have concerns or questions. We want to work together!

DON'T -

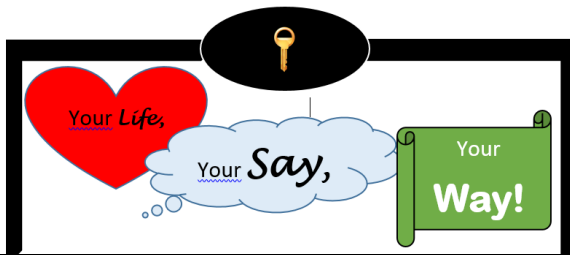
- Don't wait until the last minute to upload. This might take more time than you think.
- As a general reminder for ALL audits, don't wait to update your REDCap settings! Update your settings as changes happen within your agency. Any new or relocated setting MUST be added to the REDCap part 4.

PROMISING PRACTICES

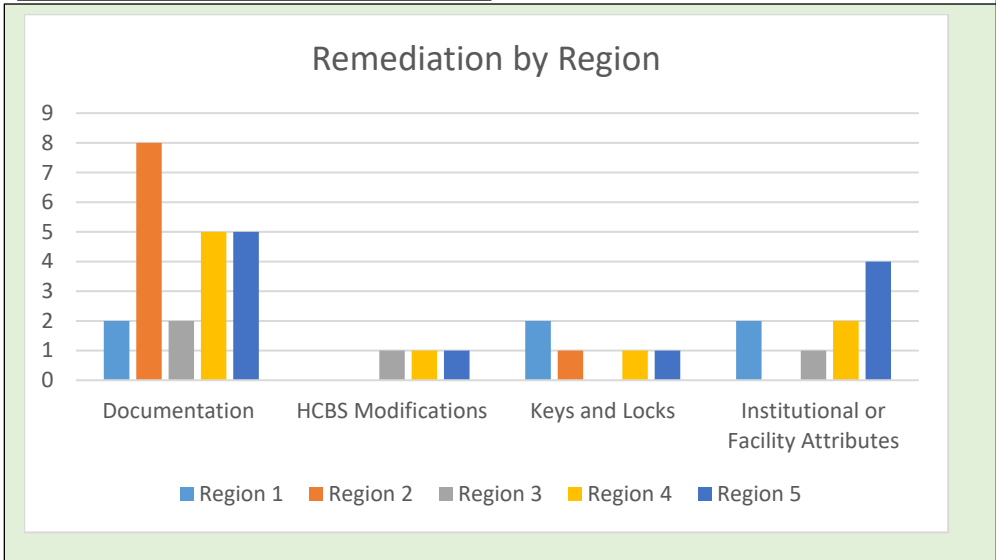
Accessibility to the setting is paramount to HCBS compliance. One provider setting took this expectation to a new level when an individual who uses a wheelchair asked to move from the first floor of her home to the second floor. The provider made the accommodations, at their expense, for this individual who now is fully independent in her accessible home!

Several settings are making use of technology to make COVID-19 less isolating for the individuals in the setting. Tablets, laptops and cell phones have been used to video chat with friends and family. Several folks have also started making use of grocery pick-up apps or other online shopping!

Promising practices extend into documentation. Several providers are ditching their setting monthly activity schedule and opting for individualized schedules that are unique to each individual and what they chose to do in any given day. This shows the review team choice and autonomy in selecting a daily schedule. The events of the day can be further explained in the daily progress notes.



Remediation Findings



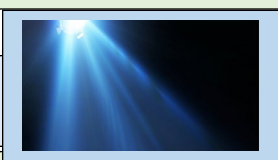
Documentation- Lack of person-centered or person-first language. Lack of documented choice, autonomy or community inclusion. Lease agreements requiring revision (specifically to include protections from eviction).

HCBS Modifications- An individual in the setting was determined to have a modification to their rights, but it is not documented.

Keys and Locks- Individuals do not have keys to their locks (bedroom and entrance door), or the lock did not have a slot for a key.

Institutional or Facility Attributes- The setting has excessive signage, numbered bedrooms, "staff-only" areas or a lack of personalization.

HCBS Spotlight





The state team will utilize this section of the Dispatch to highlight specific elements of the HCBS Final Rule. Our first spotlight is on KEYS.

Each individual has the right to privacy. In a provider-owned residential setting, this means that each individual must have a door that locks and can be opened with a key. Each individual has the ability to lock their door either from the inside, or the outside (if someone wants to lock their door while they are gone). In addition, individuals must have the ability to access the entrance door to their home.

So, what does this mean for providers?

- ✓ A "master" key must be available to necessary staff in the event of an emergency.
- ✓ Any individual who cannot successfully manage a bedroom key must have a documented HCBS modification. This process is outlined in an approved HCBS Policy. This modification must also be documented in the individual's ISP in WaMS. This can be done in the safety restriction section within the part 5.
- ✓ Each individual must also be offered an entrance door key. This is a practice of normality when someone is paying rent and has a signed lease agreement.
- ✓ Individuals do not need to use their keys, but they must be provided.





Resources

- [HCBS Toolkit](#)
- [CMS' HCBS Requirements Compliance Toolkit](#)
- [HCBS Settings Final Rule](#)
- [Virginia Resident Landlord and Tenant Act \(VRLTA\)](#)
- [Additional questions can be emailed to: hcscomments@dmas.virginia.gov.](#)