



Licensed Services Policy and Procedures

Effective 11/21/05

Table Of Contents

Introduction.....	1
General Provisions and Licensing Process.....	2
Administrative Services.....	3
Management and Administration.....	3
Physical Environment.....	4
Physical Environment of Residential Service Locations.....	4
Human Resources.....	5
Confidentiality and Security of Personnel Records.....	5
Background Checks.....	5
Job Description, Qualifications, and Personnel Records.....	5
Staff Training.....	6
Notification of Policy Changes.....	6
Performance Evaluation.....	6
Tuberculosis Screening.....	7
Health and Safety Management.....	7
Risk Management.....	7
Emergency Preparedness and Response.....	7
Services and Supports.....	8
Service Description and Staffing.....	8
Mission, Philosophy, and Goals.....	8
Service Description.....	9
Provider Staffing Plan.....	9
Quality of Services.....	9
Screening, Admission, Assessment, Service Planning, and Orientation.....	10
Referrals.....	10
Initial Meeting.....	10
Assessment.....	11
Individualized Services Plan (ISP).....	11
Orientation.....	12
Crisis Intervention and Clinical Emergencies.....	12
Medical Management.....	12
Medical History and Health Information.....	12
Medical Equipment.....	13
Medication Management Services.....	13

Medication Administration.....	14
Medication Errors and Drug Reactions.....	14
Interface with Family and/or Physician.....	14
Behavior Management.....	15
Positive behavior management techniques.....	15
Formal Behavior Plans.....	15
Prohibited Actions.....	16
Continuity of Service and Discharge.....	16
Records Management.....	18
Confidentiality, Access and Security.....	18
Documentation Policy.....	18
Individual Service Record.....	18
Retention of Individual Service Records.....	19
Record Review Process.....	19

Introduction

ICON Community Services, Inc. provides a variety of services to the community in support of its mission to broaden public awareness and improve access to opportunities in the community for people who have historically been excluded because of disability. ICON is licensed to provide supportive in-home services and day support services to individuals with severe disabilities. The purpose of this manual is to present the policies and procedures relevant to these licensed services.

Supportive in-home services and day support services are funded primarily by local Community Services Board under the auspices of the Virginia Department of Mental Health, Mental Retardation, and Substance Abuse Services (DMHMRSAS). Services may also be funded through other governmental or private entities.

ICON seeks to make available the roles, responsibilities, and rewards of being an active community member. These roles include being a neighbor, shopper, club member, civic volunteer, and worker. In order to achieve this, ICON provides the formal and informal individualized supports necessary for individuals to learn the skills and to develop the relationships needed to fulfill their chosen roles. Activities are chosen by the individual consumer in light of the individual's goals, strengths, interests, and needs as described in an Individual Services Plan (ISP) as well as formal statements of Goals and Objectives.

The activities take place in a variety of settings within the community, including the individual's home, nearby stores, or recreational facilities. Activities lead to the development of a personal network, the acquisition or improvement of independent living skills, and an increased ability to access the resources of the community.

ICON operates no residential or day support facilities, as these would conflict with the mission to provide community-based, individualized services to support individuals who are integrated into the community. All direct services are delivered by ICON employees. Contractors, students, or volunteers may be engaged in other aspects of ICON's activities, but do not provide direct services to consumers.

General Provisions and Licensing Process

ICON operates in accordance with the licensing requirements and the rules and regulations of the Virginia Department of Mental Health, Mental Retardation and Substance Abuse Services (DMHMRSAS). These are contained in the *Rules and Regulations for the Licensing of Providers of Mental Health, Mental Retardation and Substance Abuse Services* (12 VAC 35-105). These rules and regulations are available in their entirety online at www.dmhmrzas.virginia.gov/documents/OL-RulesandRegulations.pdf.

ICON maintains a full three-year license to provide supportive in-home services and day support services without any limitations, stipulations, or variances. ICON's Community Living Services (supportive in-home services) are not a "residential service" as defined in the Regulations at 12 VAC 35-105-20. ICON is affiliated with the Fairfax-Falls Church Local Human Rights Committee (LHRC).

Administrative Services

Management and Administration

In order to offer supportive in-home services and day support services, ICON complies with applicable federal, state or local laws and regulations that include, but are not limited to:

- DMHMRSAS regulations
- Licensing terms and requirements
- All applicable Federal, state, and local laws and regulations, including the Equal Employment Opportunity Act, the Americans with Disabilities Act, Occupational Safety and Health Administration and Virginia Department of Health regulations, Department of Health Professions regulations and law, and Uniform Statewide Building Code and Fire Prevention Code
- Code of Virginia Section 37.1-84.1 regarding the human rights of individuals being served
- Code of Virginia Section 37.1-197.1 regarding the pre-screening and pre-discharge planning of individuals being served
- ICON's own policies and procedures

Because ICON has no facilities from which it delivers services, ICON makes its license available upon request for public inspection at its administrative offices as well as online at <http://iconservices.org/quality/certs/licensure.pdf>.

ICON consents to all reasonable requests from DMHMRSAS representatives to obtain information from staff and clients and provides written notifications and information to the Office of Licensure as required. In addition, the organization submits, or makes available, reports and information that the Office of Licensure requires to establish compliance with applicable regulations and statutes in a timely manner. These reports are documented in greater detail in ICON's Human Rights Policies and Procedures document.¹

ICON will notify the DMHMRSAS Office of Licensing in writing, prior to implementation, of any changes which affect the organizational or administrative structure, including change of name; location of its administrative offices, and significant changes in qualifications or job description of licensed services related positions.

ICON is a legally incorporated non-profit organization founded in the Commonwealth of Virginia in 1985, and governed by a volunteer Board of Directors with responsibility for

¹ This and other Policy and Procedure documents may be requested from ICON by mail or phone, or accessed on our website at <http://iconservices.org/policies/>.

policymaking and fiscal control. The Board employs an Executive Director who in turn hires qualified personnel to implement the policies approved by the Board.

The Executive Director meets with the Board of Directors at least four times a year to review the services being provided, the current financial condition, and other business of the corporation. Minutes of each Board meeting are prepared by administrative staff and approved by the Board at the subsequent meeting. A roster of Board members and a current organizational chart are maintained by the Administrative Director.

ICON observes generally accepted accounting principles. Financial records are audited annually by an independent certified public accounting firm to assure that statements are presented fairly and in conformity with generally accepted accounting principles. Appropriate internal controls are implemented as described in the organization's Financial Policies and Procedures, and are reviewed annually by ICON's independent auditors.

While the organization does not bond its Directors or staff members, it does maintain employee dishonesty insurance as well as other liability insurance. The current coverage amounts are documented in the organization's *Financial Policies and Procedures*.

ICON makes its written fee schedule available upon request.

ICON also recognizes that individuals being served may need assistance with their own finances. Its service team staff and program directors make every attempt to identify a family member or other trusted individual who is part of an individual's community support network to provide this service. When that is impossible, an ICON staff member will assist the individual to ensure that rent or other bills are paid when due and that money for food, medicine, or other necessities is available and accessible for those purposes. In the vast majority of cases, ICON's support consists of simply helping an individual to budget, pay bills, and balance a checkbook, but from time to time it is necessary for ICON to more actively manage an individual's money, and/or serve as a representative payee. Policies and procedures covering money management services are documented in ICON's *Consumer Money Management Policy and Procedures*.

Physical Environment

As noted in this document's Introduction, ICON does not own, lease or operate any facilities. ICON's administrative offices, located in Alexandria Virginia, occupy leased space that is fully accessible and well maintained. ICON has a Certificate of Occupancy for this location; fire inspections and fire drills are conducted by building management as required by law.

Physical Environment of Residential Service Locations

ICON's Community Living Services take place at community locations and in the homes of the people served. ICON has no control of these environments, although it does pro-

vide support for basic home maintenance, if those served agree that they need assistance in this area.

Human Resources

Confidentiality and Security of Personnel Records

ICON maintains an organized system to protect the confidentiality of its paper and electronic personnel records. Paper files stored at its administrative office location and in its offsite facility are locked and keys are controlled. Health-related information is maintained separately from personnel files. Electronic data is password protected and accessible only within its internal network. Backups are created periodically and securely stored off-site.

Background Checks

To ensure the health and safety of those receiving services, the following procedures are followed:

- Applicants for all positions are asked whether they have been convicted of a felony or misdemeanor, including but not limited to sex-related or child abuse related crimes, or whether such charges are pending. If so, the applicant is required to explain the incident, including date, jurisdiction, type of offense, and disposition of the charge.
- Applicants accepting employment as direct service personnel in a licensed program provide written authorization and fingerprints to enable an FBI criminal background check and a Department of Social Services founded child abuse and neglect registry search as required in § 37.1-183.3 of the Code of Virginia.

ICON submits the required information and obtains the results of these checks prior to delivery of licensed services by newly hired employees.

Job Description, Qualifications, and Personnel Records

Job applicants are provided with a job description (stating job title, title of immediate supervisor, and job duties and qualifications) during the interview and again during new employee orientation. All current job descriptions are posted on the internal staff website.

All personnel records contain:

- Identifying information such as name, social security number, etc.
- Education and training history
- Employment history
- Documentation of pre-employment reference checks
- Results of criminal and child abuse registry background checks, for direct service workers in licensed programs
- Performance evaluations
- Documentation of disciplinary action taken by ICON, if any

- Documentation of adverse action by any licensing bodies or human rights committees, if any
- Record of participation in professional development activities and formal training, including initial orientation.

Personnel records are retained for at least three years following termination of employment.

Staff Training

Staff orientation begins upon hire and includes both formal and informal training and feedback. At a minimum, all direct service staff are required to attend training in the following areas:

- Orientation to ICON
- Human Rights Policy and Procedures
- Incident Reporting Procedures
- First Aid and CPR
- Universal Precautions
- Community-Based Training Techniques
- Writing of Goals and Objectives
- Behavior Support Strategies
- Interdisciplinary Approach
- Person Centered Planning
- Documentation Policies and Procedures

Some of this training is provided by ICON staff both formally and informally; some is provided by the Fairfax-Falls Church CSB, or through other entities.

Opportunities for ongoing staff development activities are provided and participation in such activities is documented in personnel files. Assessment and planning for staff development activities occurs annually as part of the performance evaluation process.

Notification of Policy Changes

The most current policies and procedures documents are always available via the internal staff website. Notification of changes to policies and procedures, as well as changes to job descriptions, are provided to staff members as appropriate.

Performance Evaluation

A formal performance evaluation document is used to document performance reviews, which take place six months following the date of hire and subsequently at the end of each fiscal year. The performance review is a collaborative effort, involving both staff and supervisor feedback concerning performance, knowledge of job duties and techniques, and determination of goals and objectives for the upcoming year. The form used to guide this process is available on the staff website, and completed forms become part of the employee's permanent record.

The formal grievance procedure for employees is documented in the *Personnel Policies and Procedures*.

Tuberculosis Screening

Each new employee in a licensed program must provide evidence of the absence of tuberculosis in a communicable form within 30 days of hire. As a requirement for ongoing employment, any employee who comes in contact with a known and active case of tuberculosis or develops symptoms of tuberculosis that last for three weeks must be screened for the disease. The employee may not have contact with other ICON staff or with individuals ICON serves until a physician certifies that the employee is free of active tuberculosis.

Health and Safety Management

Risk Management

ICON has designated the Director of Employment Services to be responsible for risk management activities. All situations resulting in serious injuries are documented through ICON's incident reporting procedures, and incident reports are analyzed annually to evaluate the incidence of injuries and whether any pattern can be identified which might lead to mitigation. ICON has developed a fall risk screening tool for all individuals served in licensed programs, and develops a fall risk assessment and plan for those determined to be at risk. Universal Precautions training is required for all direct contact staff. This training must be renewed annually to ensure the most up to date practices are used to safeguard staff and individuals served.

Emergency Preparedness and Response

ICON has developed an *Emergency Readiness Plan* which addresses both business and service continuity in the event of emergency. Because all services are highly individualized and community-based, each individual served has a personal emergency plan suited to the individual's circumstances. The *Emergency Readiness Plan* and individual plans are maintained on the internal staff website so that they are available in the hour of need. Individuals served also have a copy of their plan and a card listing emergency contacts and other information which may be necessary in an emergency situation. Training and review of emergency preparedness plans is provided annually to staff, as well as part of orientation for new hires.

Since ICON does not control the sites where services take place, it cannot ensure that first aid kits are maintained in every service location. Staff members have first aid kits available in their cars, and a full kit is maintained at ICON's administrative office.

Services and Supports

Service Description and Staffing

Mission, Philosophy, and Goals

ICON provides a variety of individualized services within Northern Virginia and the surrounding area, with an emphasis on enabling citizens with disabilities to achieve self-determined lifestyles with the greatest possible level of independence. These services are consistent with its mission to broaden public awareness and improve access to opportunities in the community for people who have historically been excluded because of disability.

It is the philosophy of ICON that disabled citizens, regardless of the degree of their disability, are people of value and are entitled to be treated with the same dignity and respect afforded non-disabled citizens of the community. Consistent with these beliefs, ICON supports The Community Imperative (<http://thechp.syr.edu/adimper.htm>):

In the domain of Human Rights:

- *All people have fundamental moral and constitutional rights.*
- *These rights must not be abrogated merely because a person has a mental or physical disability.*
- *Among these fundamental rights is the right to community living.*

In the domain of Educational Programming and Human Services:

- *All people, as human beings, are inherently valuable.*
- *All people can grow and develop.*
- *All people are entitled to conditions which foster their development.*
- *Such conditions are optimally provided in community settings.*

Therefore: In fulfillment of fundamental human rights and in securing optimum developmental opportunities, all people, regardless of the severity of their disabilities, are entitled to community living.

Consistent with these principles, ICON's services are oriented toward promoting valued social roles for consumers in the community. This implies a responsibility on the part of the agency to foster positive attitudes of understanding and support in the community through a continuing effort of public education. In addition to formal education efforts, ICON's programs encourage consumers to take advantage of generic services and community organizations and activities. ICON's goal is to end the segregation of and discrimination against people with disabilities. We work to achieve this goal both through direct community education efforts and through the constant pursuit of innovative ways of providing community-based services. All our services are designed to provide the precise

supports each individual needs to become a contributing member of the community, with all the rights and responsibilities such citizenship entails. Each individual we serve thus becomes another voice in the struggle for full citizenship for all.

Service Description

Community Living Support is provided on a 'drop-in' basis dictated by the needs of each individual. Staff assistance can vary for each individual over time and is guided by an Individual Services Plan (ISP). Support includes strategies designed to meet identified needs and to attain desired goals.

In conjunction with goal driven supports, ICON strives to connect the individuals served with a network of relationships in the community. These relationships and support from parents, family, guardians, and friends are necessary components of program success.

Day Support services are provided at various locations in the community which enable those receiving services to increase their community network, engage in activities they find interesting, and, in many cases, contribute to the life of the community through volunteer work.

New referrals to ICON's services are provided with a Consumer Handbook which describes all service offerings as well as the individual's rights in relation to services.

Provider Staffing Plan

Because of the highly individualized nature of ICON's services, staffing levels are determined by those referred for services, and can be extremely fluid depending on the needs of the people served.

While student interns, contractors or volunteers may be utilized in other areas, only ICON staff deliver direct services to individuals.

Because of ICON's extremely flat organizational structure, direct service employees are supervised by one of two Program Directors (Community Living Services or Employment Services).

Quality of Services

ICON has several mechanisms for monitoring and improving service quality. Individual goals and objectives are reviewed with the individuals receiving services on a quarterly basis and their feedback concerning the relevance of and progress on the objectives is solicited. In addition to the annual satisfaction surveys administered by ICON for the local Community Services Boards, ICON conducts its own surveys of consumers of services, their family members, and funding agents. The mechanism of these surveys allows the respondents to respond anonymously if they so choose. Finally, ICON maintains a database of measures of independent living and connection with the community which helps to judge the effectiveness of our supports over time. The results of these surveys are published annually and are available at <http://iconservices.org/pig.html>.

Screening, Admission, Assessment, Service Planning, and Orientation

Referrals

Referrals can come from several sources. Applicants may be referred by themselves, family members, guardians, or other interested parties, such as CSB representatives. Referrals may be transmitted by telephone, in writing, or through personal appointment.

Admission requirements for all licensed programs are the same. They are assessed by the appropriate program director and are as follows:

- The individual wants to receive services.
- The individual needs the service(s) that ICON delivers.
- The individual has at least one disability label.
- The individual has a source, public or private, to fund services costs.

ICON has no exclusion criteria. In extraordinary circumstances there may be a delay in commencement of services commensurate with the time required to hire additional staff persons, but there has only been one period in ICON's 20-year history that a waiting list for services was required. In such a situation, the person referred and the referral agent are notified of the estimated time until service can begin, and they are free to choose another provider should they so desire.

Initial Meeting

A meeting between the individual referred for services and the appropriate Program Director follows receipt of the referral. Funders may also be represented at this meeting, as may family, guardian, or other individuals, given the permission of the individual referred. This meeting is designed to:

- Get to know the individual.
- Introduce ICON to the individual and others in the individual's life, as appropriate.
- Inform the individuals of the services available.
- Make a preliminary determination of the individual's support needs.

If not completed prior to this meeting, the individual, or a representative, prepares an application for program admission. If the individual has been referred by someone other than a CSB representative, a funding eligibility assessment may be undertaken if the individual is unable to privately fund services.

In addition, key pieces of information may be gathered from and provided to the referred individual. These include, but are not limited to, emergency contact and medical information, human rights statements and acknowledgements, information release forms, and a consumer handbook.

A file will be established for all individuals with whom the Program Director meets to consider program admission. If the individual is not subsequently admitted to the program, the retention period for this file is six months. For those admitted, these documents become part of the service file.

Assessment

The Program Director will conduct a preliminary assessment. This assessment will initiate development of a profile of the consumer's strengths, unique characteristics, physical, medical, behavioral, functional and social needs, preferences, interests, required environmental adaptations, and currently available social and community resources. Attempts will be made to acquire previous assessments of the individual. Review of the initial assessment will be made whenever significant circumstances change, but at least annually.

Individualized Services Plan (ISP)

All relevant preliminary assessment of the individual's current needs will be documented in a preliminary ISP, which will guide service delivery for the first 30 days, and may include provisions for additional assessment, if warranted.

A full ISP will be affirmed or modified within the first 30 days of service. This ISP will address:

- The individual's needs and preferences.
- Relevant psychological, behavioral, medical, rehabilitative, and nursing needs identified during the assessment.
- Goals, measurable objectives, and target dates that address each identified need.
- Individualized strategies, service supports, and service frequency to accomplish the goals and objectives.
- A communication plan for those with communication or language barriers.
- The behavior treatment plan, if applicable.

Direct service staff members will generally prepare the goals, objectives, and strategies for accomplishment, with the assistance of the Program Director. They are also responsible for quarterly reporting and review of the continued relevance of the goals, in conjunction with the individual receiving services.

The initial ISP and all quarterly and annual reviews must include acknowledgement and acceptance of the ISP via signature of the individual or his/her legally authorized representative as well as the direct service staff person involved.

In addition to quarterly reviews, direct service staff maintain signed and dated progress notes for each day that service is delivered, documenting the service provided as well as progress on goals and objectives and any significant changes in the individual's life.

Orientation

Orientation begins with the initial meeting, when ICON's philosophy and the nature of our services is communicated to the individual and a legally appointed representative, if applicable. At the initial meeting, copies of ICON's Consumer Handbook are made available, and the contents are reviewed. This document explains the services provided by ICON as well as the individual's right to participate in the planning of services, human rights, confidentiality, and other rights of the individual and the process to take if they feel their rights have been violated. They are also presented with a one-page statement of human rights, which contains the name and number of the local Human Rights Advocate; a second copy of this document is signed by the individual and/or legally appointed representative and becomes a part of the person's service file.

Crisis Intervention and Clinical Emergencies

As part of the initial meeting, ICON gathers information about the individual's medical conditions, including allergies and medications used, as well as emergency contact information for use in an emergency situation and any other information relevant to the particular individual with respect to medical or other emergencies. Individuals and/or their legally appointed representatives are given an opportunity to sign releases to enable ICON to act on their behalf in an emergency situation should it become necessary.

Any crisis situation or clinical emergency which arises is documented through the organization's incident reporting process, which captures the date and time of the incident and the name of the individual and others present, the nature of the emergency, the precipitating factors, if any, the intervention/treatment provided, and the outcome. If necessary, a follow-up report is maintained documenting continued intervention related to the incident or emergency situation.

Medical Management

In most cases, the people ICON serves have others in their lives who are responsible for their health care needs. However, there are some who rely on ICON to provide and/or arrange for health care; the extent of this involvement ranges from transportation to doctor or dentist appointments to monitoring their medication administration up to four times per day.

Since each person service has unique needs, an individualized plan is developed for those who rely on ICON for assistance with their health care needs; this plan is made part of the ISP.

Medical History and Health Information

The individual's and the staff member's safety are the paramount considerations underlying this policy. It is designed to meet those considerations as well as to recognize the confidential nature of medical information, to respect the individual's right to privacy, and to limit information gathered to that required to deliver its drop-in supportive in-home services or day support services in a responsible manner.

ICON does not require a physical examination prior to admission, but requests health and medical history information from the case manager and/or the individual or his representative. Information provided by the case manager is confirmed and updated during the referral meeting with the individual or his/her guardian. Emergency contact and medication information are also gathered at intake. This information is updated when there is a known change and at least annually.

For all individuals this following information is ascertained:

- Allergies.
- Recent physical complaints and medical conditions.
- Chronic conditions.
- Communicable diseases.
- Restrictions on physical activities, if any.
- Past serious illnesses, serious injuries, and hospitalizations.
- Serious illnesses and chronic conditions of the individual's parents, siblings or significant others in the same household.
- Current and past drug use, including alcohol, prescription and non-prescription medications, and illicit drugs.
- Sexual health and reproductive history.

Medical and emergency contact information is maintained in the individual's file and by the direct service person(s) who serve the individual.

Medical Equipment

ICON does not provide medical equipment to the individuals it serves; however, some of these individuals do use medical equipment such as wheel chairs, blood pressure and blood glucose testing equipment. Individuals who use medical equipment are advised to contact their case manager and the Community Living Services Director immediately should they experience problems with or damage to this equipment. Should it be necessary, ICON staff will advocate with the individual to ensure required equipment is available and in good working order.

Medication Management Services

Individuals served by ICON sometimes require assistance in the administration or management of their prescription medications. All staff that assist in or supervise the self-administration of medication will successfully complete a course on medication administration. Proper documentation of training is kept in the individual staff member's personnel file in the ICON office.

Prior to the actual delivery of services, ICON staff develop a plan for medication administration which includes both documentation requirements and a review of the existing health and medication administration documentation. The specific procedures used with

an individual consumer are determined by the nature of their daily activities, frequency of administration requirements, and the individual's ability to manage his/her own needs.

Medication Administration

The following guidelines apply to medication administration.

- A release authorizing ICON staff to provide medication assistance is required from each consumer and/or legally authorized representative who requests medication assistance.
- Medication is only given to an individual consumer when ICON has received a written order by a physician or other legally authorized person.
- Medications are presented to ICON staff in a bottle with a legible pharmacy label. The unit dose and dosage frequency should appear on the label.
- The medication should be given as indicated by the medication record. This record should include name of the consumer, name of medication, dosage amount, and, dosage time. The record should also indicate any adverse reactions to look for, as well as procedures to follow in the event they occur.
- Medications which are discontinued or outdated will be disposed of promptly.

Individuals who request assistance in the administration of non-prescription medications, such as aspirin, are also asked to sign a release to that effect, indicating under what conditions such non-prescription medications should be administered. Under no circumstances will an ICON staff member dispense a non-prescription medication in the absence of such a release.

Medication Errors and Drug Reactions

In the event of a medication error or drug reaction, ICON staff will first administer first aid if indicated, and do whatever else is necessary to safeguard the health of the person receiving services, including contacting a poison control center or emergency medical personnel.

An incident report will then be filed detailing the person's name, date and time of the incident, nature of the incident, and response to the incident. The incident will also be recorded in the individual's medication log. Incident reports are analyzed quarterly as part of the quality assurance process.

Interface with Family and/or Physician

ICON staff will notify the family or physician no later than one week before a medication should be refilled.

ICON staff should contact the family member or physician if there is any question or doubt about a medication order or change.

Behavior Management

ICON believes strongly that behaviors are a form of communication, and that the appropriate response to challenging behaviors is to learn what the individual is trying to communicate and to provide the individual with equally effective alternative forms of communication. It accomplishes this through positive behavior management techniques, and categorically prohibits the use of any aversive techniques, including seclusion, restraint, and 'time-out'.

Positive behavior management techniques

Techniques used may be direct or indirect. The following techniques may be used when appropriate:

- Offering assistance or support
- Offering of choices, expansion of individual choice and decisionmaking
- Functional analysis of the behavior
- Pragmatic analysis of individual's communication
- Teaching a positive means to communicate one's wishes
- Teaching an alternative behavior
- Reinforcing an alternative behavior using social reinforcement, delayed reinforcement, immediate reinforcement, or tangible reinforcement
- Change of the individual's schedule of reinforcement
- Modification of the task or activity or schedule
- Planned ignoring of the occurrence of the problem behavior without ignoring the individual (this should be done with caution, as the behavior serves a specific purpose for which the individual may have no alternative behavior, in which case, ignoring would be counterproductive)
- Distraction or redirection of the individual to desired behavior or activity
- Environmental modification or adaptation
- Enhancement of individual's life opportunities, opportunities for variety of experiences and enjoyable activities with a variety of individuals, particularly participation in typical activities and interactions with non-disabled individuals
- Verbal prompting, cueing, reminders, etc. done in a positive, non-reprimanding way

Formal Behavior Plans

Often, the informal application of the techniques mentioned above will be sufficient to alter a problem behavior, but sometimes a formal behavior plan is required. All individualized plans will:

- Be consistent with ICON's Human Rights Policies and Procedures;
- Be developed by a team of individuals who will be directly involved with their implementation.

- Define the goal(s) and objective(s) for correcting a targeted behavior from the individual's perspective and include measurable outcome(s), appropriate for the individual.
- Rely on implementation of the least intrusive intervention method expected to produce positive results.
- Include specific, time-framed measurement methods and the frequency for evaluating progress.
- Be documented and evaluated in a timely manner.

As with any intrusion into the physical and psychological parameters of another's life, behavior management interventions should receive thoughtful consideration, careful planning and responsible monitoring. As noted in Part III, Article 4, all direct service staff receive training in positive behavior support strategies as part of their initial orientation. Those who serve individuals with challenging behaviors receive more intensive training as appropriate to the individual situation.

All formal behavior plans will be supervised by the Director of the service under which the plan is implemented, both of whom undergo continuing education in the field of behavior management. In addition, ICON maintains a relationship with Dr. Celeste Campbell, a Licensed Clinical Psychologist, who can provide additional input and oversight when it is required.

Prohibited Actions

Because ICON does not operate a facility of any kind, many of the practices prohibited by Licensure or Human Rights regulations do not apply, since ICON is not in a position to deny individual freedom, and individuals served may reject ICON's services at any time. Specific actions prohibited for ICON staff are detailed in the *Human Rights Policies and Procedures*, Part D, Section 2 and Section 8.

As a last resort measure in an emergency when an individual is putting himself or others at risk of physical injury and all other attempts at intervention have failed in that specific instance, physical intervention may be used. The physical intervention shall only be what is minimally necessary to protect the individual and/or others. Shadowing (placing one's own body between the individual and the target of his or her aggression) shall be used as a minimal step. If shadowing is not successful, then physical restraint may be used in a crisis, but not as a regular means of behavior management for an individual. If physical restraint is used, it shall only be what is minimally necessary to protect the individual and/or others. Should this action be necessary, Incident Reporting procedures will be implemented immediately.

Continuity of Service and Discharge

ICON's structure is such that a transfer between its services, as defined in these regulations, would not occur.

ICON believes strongly in an orderly transition whenever an individual terminates a relationship with ICON. ICON has no formal criteria for separation from services; separation generally comes at the request of the individual served, or as a result of changes in the funding structure which no longer enable ICON to provide the services required by the individual.

In almost all cases, an interdisciplinary team meeting is called to ensure that the individual's ongoing needs continue to be met during the separation process and that all relevant information is communicated to any new provider of services. A separation summary is prepared which documents the reasons for separation, the participation of consumer in planning for separation, the consumer's level of functioning or functional limitations, if applicable, recommended procedures, activities, or referrals to assist the consumer to maintain or improve functioning or increase independence, progress made in achieving goals and objectives of the ISP, and the status of planning for future services for the individual.

Records Management

Confidentiality, Access and Security

With respect to confidentiality, access, and security of paper and electronic information on individuals served, ICON follows the requirements of Virginia licensure and human rights regulations, as well as other relevant state and federal laws and regulations. These practices are documented in Part D, Sections 6 and 7 of the organization's *Human Rights Policies and Procedures*. Records are maintained by direct service staff under the supervision of the appropriate Program Director.

Service records are located in locked filing cabinets in the ICON office. These records are retained in the office for six months after separation from services, then moved to a secure offsite storage facility.

ICON also maintains certain electronic records, including databases and electronic copies of individual services plans and reviews. Because there is no facility and services are delivered all over the Northern Virginia area, some of these records are made available online to improve productivity and facilitate quick response. Access to such records is both encrypted and password protected, with each staff person having an individual password and access only to the appropriate group of records.

Documentation Policy

A physical file serves as the primary location of records pertaining to an individual and the services provided to that individual over time. The contents of the file vary depending on the service received and the individual's unique situation, but all files contain at a minimum the items listed in the next section headed "Individual's Service Record". Active files are reviewed regularly to ensure that all required information is present and files are up to date. All records generated by ICON are signed and dated by the individual creating the document; many are also signed by the individual being served. Any corrections to the record are made in such a manner as to make obvious the date and nature of the correction.

Individual Service Record

Each primary consumer record contains a face sheet which documents

- name and a unique identification number for the individual
- address, phone, and email contact information
- social security number
- gender and marital status
- date of birth

- names and telephone numbers of persons to contact in an emergency
- adjudicated legal incompetency or legal incapacity, if applicable
- name of legal guardian or authorized representative, if any
- date of admission

In addition, the service record contains, at a minimum:

- an admission form
- screening, referral and assessment information
- individualized service plan and service plan reviews
- progress notes
- a termination summary, if applicable

Retention of Individual Service Records

Service files are preserved in their entirety for at least three years following date of separation from services. Older records may be purged of day-to-day and other service-related information, but the following information is retained permanently for each person served by ICON:

- Consumer's name
- Social security number
- Date of consumer's birth
- Dates of admission and discharge
- Name and address of legal guardian, if any

Record Review Process

ICON staff review records on a regular basis for completeness, accuracy, and timeliness of entries, utilizing a checklist developed for this purpose.