

Checklist: Freedom from Coercion and Restraint

Policy, Procedures and Operational Guidelines

<ol style="list-style-type: none"> 1. Ensure that P&P Manual contains the specific requirement that providers ensure that individuals are free from coercion and restraint. 2. Ensure the P&P Manual describes the expectation that the provider does not allow practices that include coercion or restraint interventions of individuals in their care. 3. Ensure the P&P Manual describes the expectation that the provider informs individuals of their rights and provides them with instructions on how to file a complaint if their rights are violated by a peer, staff or any other person present at the setting and that a recipient rights document and who to contact to file a complaint is posted in a public area. 4. Ensure that P&P Manual describes the specific procedure to obtain due process if a modification is required, in keeping with the description in the <i>Checklist for Person- Centered Plan Documentation of Modifications to HCBS Requirements</i>. 5. Ensure that P&P Manual requires provider staff are trained with regard to individuals' rights to freedom from coercion and restraint. 	✓ Does the Manual contain the expectation for each policy? ✓ Does the Manual describe the provider's specific procedures for ensuring each policy is implemented?		
	Check to confirm policy is complete	Yes	No
	1. Contains		
	2. Describes		
	3. Describes		
	4. Describes		
5. Requires			

Ensure that provider staff have been trained to competency for this requirement. <ol style="list-style-type: none"> 1. Is there training curriculum available for review? 2. Does the training material accurately reflect the requirement and what it should look like in practice? 3. Do the training rosters show that all staff have been trained in this requirement? 	Name of Training: Name of Trainer: Date of Training: Training Roster Available:
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Provider Confirmation		External Review for Heightened Scrutiny Review & Advocacy		
Name of Policy:		<u>Type of Review</u>	<u>Name of Reviewer</u>	<u>Date</u>
Policy Page or Number		Certification		
Date Policy Completed/Approved:		Monitoring		
Approved By:		Advocacy		

NOTE: External Reviews will include "Observation" and "Interview" questions below during Certification and Monitoring Visits

Observations	Individual/Staff Name(s)	Date
Observe to ensure that individuals are free from coercion and restraint.		
If there is an approved restriction, there is a plan in process to remove it that is consistent with the person- centered plan and due process policy.		

Interviews	Individual/Staff Name(s)	Date
<p>Interview individuals to ensure that they are aware of this right and feel free from coercion and restraint. Examples of questions to ask:</p> <ul style="list-style-type: none"> ✓ Do staff help you do the things you tell them you want to do? ✓ Do you feel safe here? ✓ Do you ever feel threatened or forced to do something that you don't want to do? ✓ Does anyone here ever physically stop you from doing anything? ✓ Do you know how to report a complaint if someone treats you in a way that you think is wrong? 		
<p>Interview staff to ensure they can describe individuals' rights to be free from coercion and restraint and their roles and responsibilities to support these rights.</p> <ul style="list-style-type: none"> ✓ If there is an approved modification or Behavior Support Plan, staff can describe how to implement it as written. 		
<p>Notes:</p>		