

Checklist: Privacy

Policy, Procedures and Operational Guidelines

<ol style="list-style-type: none"> 1. Ensure that P&P Manual contains the specific requirement that individuals have the right to privacy, have the right to have their information kept private, and have the right to have personal care provided in private. 2. Ensure the P&P Manual describes the expectation that people have access to make and receive private telephone calls and access to personal communication via text, email or other personal communication method as well as a location where they can visit with others privately. 3. Ensure the P&P Manual describes the expectation that the provider and staff keep personal information private and do not share it with others without the person's expressed consent. 4. Ensure the P&P Manual describes the expectation that staff will not enter the person's living unit without first knocking on the door and obtaining permission from the person to enter the living unit. 5. Ensure that P&P Manual describes the specific procedure for choosing a roommate, whenever possible. 6. Ensure that P&P Manual describes the expectation for obtaining due process if a modification to is required, in keeping with the description in the <i>Checklist for Person- Centered Plan Documentation of Modifications to HCBS Requirements</i>. 7. Ensure that P&P Manual requires provider staff are trained with regard to individuals' right to privacy. 	✓ 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. Describes		
	6. Describes		
7. 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
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Observe that individuals are afforded the right to privacy.		
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 they are aware of their right to privacy. Examples of questions to ask:</p> <ul style="list-style-type: none"> ✓ Do staff allow you to have privacy when you want it? ✓ If you have visitors, can you visit with them privately? ✓ If you want to make telephone calls, do you have a place to do that privately? ✓ Do staff help you with any personal care? Do they do that in a private place? ✓ 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. 		
<p>Interview staff to ensure they can describe an individual’s right to privacy, including not sharing personal information without the individual’s consent and not entering the living unit without permission.</p> <ul style="list-style-type: none"> ✓ If any individual has an approved modification about staff entering the living unit without permission that is consistent with the due process policy, ensure staff know about the restriction and the plan to remove it, and can describe their roles and responsibilities in implementing that plan. 		
Notes:		