

VNPP Conference

Challenges of Compliance with the CMS “Final Rule”

Forecasting Worksheet

For each setting –

- Describe the location in relation to the greater community; would I be able to identify the setting as an agency program site?
- How do you access your community?
- How do the individuals you support access the community?
- How do you engage in the life of your community?
- How do the individuals you support engage in the life of the community?
- What is the agency policy/practice for ensuring that individuals have the opportunity to seek employment?
- What is the agency policy/practice for allowing individuals control of their personal resources?
- What options are offered for settings which are not disability-specific or are private units in a residential setting?
- What are the barriers to having the options listed above?
- How are choices offered? Are visits offered and encouraged? Are other strategies used? How is the practice monitored and promoted?

For provider controlled settings –

- Do you own or lease from the owner the residential buildings?
- In each case, do each of the residents have a legally enforceable lease agreement for their specific living space or unit?
- Are the doors of the individual living spaces (bedrooms) lockable to prevent entry by others? Who has a key? What is the agency policy/practice for managing privacy?
- Are bedrooms shared with others with disabilities? If so, how are individuals offered a choice of roommates and how is it documented?
- Who chooses the paint colors, the window treatments, bed linens, decoration for the bedroom? How is the individual's role documented? Does each individual have photographs of friends, family, activities/vacations?
- What is the agency policy/practice for visitors in residential settings?
- What is the agency policy/practice for storage and preparation of food or snacks? Are there scheduled meal/snack times?
- Are wake-up times and bedtimes prescheduled? What provisions are made when someone wants to "sleep in"?
- What is the agency policy/practice for placing restrictions or limiting the individual's control of his/her life?
- During day support programs, are there opportunities to interact daily with persons (other than staff) who are not disabled? What is the agency policy/practice for individuals going "out for lunch" or taking a walk outside on a break?

Person-centered Planning –

- How do you document the role of the individual in the PCP process?
- How does the individual choose participants? How does the individual direct the process?
- How are the options for choice of types of supports, choice for providers of those supports, and choice for alternative settings being documented?
- How are limitations/restrictions included in the plan? How often are they revisited?
- Are the restrictions (eg., limitations on access to food) for one made restrictions for all? How are exceptions offered & implemented?