

**Cottonwood, Inc.
Policies and Procedures**

SECTION: General

POLICY NO: 02-025

SUBJECT: Right to The Least Restrictive Environment

EFFECTIVE DATE: November 2019

Policy:

Cottonwood, Inc.'s policy regarding measures to limit access to certain food storage areas, laundry areas, or staff work or break areas will be consistent with the least restrictive setting principle that all individuals have the right to move about freely in their chosen environments. The following criteria apply:

Measures are implemented on an individualized (not setting-wide) basis.

Measures make accommodations (e.g., providing a key or key-code, alternate personal food storage, or alternate access to healthy snacks) for individuals who are not at risk for harm should they have access.

Measures are documented in the individual's Person-Centered Support Plan or Behavior Support Plan as a modification of the generally applicable rights, consistent with the federal and state criteria for such modifications.

Measures are not developed or used for non-person-centered purposes, such as punishment or staff convenience.

Common Areas such as break rooms, living rooms, kitchens, dining rooms, meeting rooms, entryways will not be restricted to any individual. Staff offices, staff breakrooms, warehouses, clinic areas with med storage, and production areas that do not employ consumers, may be restricted as a general business practice and will not be considered restrictive.

For individuals who privately lease their own apartments and who have staff assist them on an individualized daily or weekly schedule there is a presumptive assertion that these individuals have full access to all part of their homes without restrictions. These settings are furnished with individuals' property and Cottonwood, Inc. staff only enters the home for specific individualized needs and with permission. This category of services is known as Supported Independent Living.

Procedures:

1. An individual's Behavior Support Plan along with the Person Centered Support Plan must document an assessment of the individual's behaviors (and the underlying conditions, diagnoses, or disorders relating to such behaviors) and the need for: safety measures; options that were explored before any modifications are put in place; the individual's understanding of the setting's safety features; the

individual's and their guardian/legal representative's consent to controlled access; the individual's preferences for engagement within the setting and the broader community; and the opportunities, services, supports, and environmental design that will enable the individual to participate in desired activities; and when restrictions might be able to be faded.

2. For housemates or other affected individuals who share the space with the restricted individual, accommodations to mitigate the restricted access will be documented in their plan. Cottonwood, Inc. will help individuals affected by proximity to these measures to gain access in other ways appropriate to their needs.
3. Any restrictive measures will be periodically evaluated for effectiveness as part of the review by the person's support team during the Person Centered Planning process. The Behavior Support Plan will also be reviewed by the Human Rights Committee, as per schedule, to determine if the restriction can be faded and deemed no longer necessary, or the environment further modified so as to mitigate the need for the restricted access.
4. Staff will be trained in these principles as part of their required classroom training and initial shadowing in the residences prior to working with consumers and annually thereafter as part of their licensing review training and annual performance evaluation review.