**Purpose:**

The Federal Government, through the Home and Community Based Services Regulations (HCBS), requires each AFH to provide keyed locks to member’s bedroom, keys to each member and develop a policy indicating under what circumstances (agreed upon with the member) staff/AFH family member may use keys to enter a member’s bedroom.

These regulations are designed to enhance the quality of HCBS, provide additional protections and ensure full access to the benefits of community living by focusing on the quality of individuals’ experiences.

**Implementation:**

1. Each AFH is required to provide privacy for every member in their bedroom by having lockable key entry doors (unlocked from the outside with a key). The member shall be provided a key to their lockable bedroom door. Each member bedroom door shall be keyed differently. The AFH shall also have a key to each member’s bedroom, which is kept in a safe place. Only appropriate staff/AFH family members are allowed access to keys to a member’s bedroom door.

2. Each AFH is required to develop a policy indicating under what circumstances (agreed upon with the member/guardian) staff/AFH family member may use keys to enter a member’s bedroom. The member/guardian shall be notified of the implementation of this policy.

3. Inclusa has developed a Member Keyed Bedroom Door Policy template for AFH Providers to use to meet this requirement. This template is located on the following page.

4. If the member has been assessed as not having the physical or mental capacity to utilize a key/lock, documentation needs to be included in the member’s AFH Individual Service Plan (ISP) or behavior plan indicating why the member’s room lock needs to be disengaged for this person.

5. The policy will need to be updated as individuals listed as having access to the key to member’s bedroom changes.

Any modification of the additional conditions, under § 441.301(c)(4)(vi)(A) through (D), must be supported by a specific assessed need and justified in the person-centered service plan. The following requirements must be documented in the person-centered service plan:

(1) Identify a specific and individualized assessed need.

(2) Document the positive interventions and supports used prior to any modifications to the person-centered service plan.

(3) Document less intrusive methods of meeting the need that have been tried but did not work.

(4) Include a clear description of the condition that is directly proportionate to the specific assessed need.

(5) Include regular collection and review of data to measure the ongoing effectiveness of the modification.

(6) Include established time limits for periodic reviews to determine if the modification is still necessary or can be terminated.

(7) Include the informed consent of the individual.

(8) Include an assurance that interventions and supports will cause no harm to the individual.

**Member Keyed Bedroom Door Policy**

The Federal Government, through the Home and Community Based Services Regulations (HCBS), requires each AFH to provide keyed locks to member’s bedroom, keys to each member and develop a policy indicating under what circumstances (agreed upon with the member) staff/AFH family member may use keys to enter a member’s bedroom.

A key has been provided to member, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, for their bedroom door.

List all AFH staff and/or family members who have access to this key:

AFH Provider(s): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Substitute Care Provider(s):\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Any other person(s) that have access to the key:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

The AFH:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ and member:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ agree AFH staff/family members indicated above may use a key to enter the member’s locked bedroom door, after knocking and awaiting a response, only under the following circumstances:

1. Any time member’s health and safety may be in jeopardy.

2.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

3.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

4.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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Member Signature Date

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Guardian Signature Date

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

AFH Signature Date