



Human Rights Policies and Procedures

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A. Policy

ICON Community Services, Inc. provides Employment Services, and Community Living Services (drop-in residential support) to people with disabilities in the Northern Virginia area. All services are delivered in integrated settings in the community; ICON does not operate facilities of any kind.

This document is intended to ensure that ICON's policies and procedures with respect to Human Rights are in conformance with 12 VAC 35-115 of the Virginia Administrative Code, which states,

"Each individual is assured:

- Protection to exercise legal, civil, and human rights
- Respect for basic human dignity
- Services that are consistent with sound therapeutic practice
- Legal rights, privileges or benefits are not denied solely because he has been voluntarily or involuntarily admitted, certified or committed to services."

B. Definitions

"Human rights advocate" means a person employed by the commissioner upon recommendation of the State Human Rights Director to help individuals receiving services exercise their rights under this chapter.

When it is determined in accordance with 12VAC35-115-145 that an individual lacks the capacity to consent or authorize the disclosure of information, ICON Community Services, Inc. shall recognize and obtain consent or authorization for those decisions for which the individual lacks capacity from an "authorized representative," described in Section D.4 of this document.

"Individual" means a person who is receiving services. This term also includes the terms "consumer" and "client".

"Executive Director" means ICON's Executive Director.

"Human Rights Regulations" refers to 12 VAC 35-115 described in the previous section.

Other terms used in this document are defined in 12 VAC 35-115-30.

C. Assurance of Rights

In order to ensure that consumers of ICON's services are aware of their rights as defined by the Human Rights Regulations, ICON will:

- Display a document listing the rights of consumers and how to contact a Human Rights Advocate, and display and disseminate any other information as requested by the protection and advocacy agency.
- Notify each consumer and his Legally Appointed Representative (if applicable) about these rights and how to file a complaint. This notice will be in writing as well as in any other form most easily understood by the individual. Such notice is provided at the time services commence and at least once in every year thereafter.
- Maintain a signed copy of the rights notification document in the individual's services record. If the individual or his authorized representative cannot or will not sign the document, this fact will be recorded in the individual's services record.
- Provide copies of this notification document to the Human Rights Advocate as requested.
- Provide this notification in other languages as necessary.

D. Explanation of Individual Rights and Responsibilities

All citizens of the Commonwealth have the right to exercise their legal, civil, and human rights, as well as the right to be protected, respected, and supported in exercising these rights, including the right to be called by their preferred or legal name.

All of ICON's services take place in the community; therefore ICON has little control over conditions consumers may encounter in their daily lives as a part of that community. However, ICON will consistently work to ensure that consumers receiving ICON services are treated with dignity, and are protected from harm, including abuse, neglect, and exploitation, and that they have both the information and the support they require to exercise their rights.

ICON provides each consumer with a 'Consumer Handbook' at the time services begin, and at any time upon request. The handbook explains various services available from ICON, and its contents are reviewed with the consumer to make sure the information is communicated adequately.

ICON Staff receive training upon hire and at regular intervals on:

- ICON's Human Rights policy
- The specific rights of individuals receiving ICON's services
- Documentation required under 12 VAC 35-115.

DIGNITY

Each individual has a right to exercise his legal, civil and human right including;

- Constitutional rights
- Statutory rights
- The rights contained in these regulations

Each individual has a right to services that he receives;

- Respond to his needs and preferences, and
- Be person-centered.

“Person centered” means focusing on the needs and preferences of the individual, empowering and supporting the individual in defining the direction for his life, and promoting self-determination, community involvement, and recovery.

Abuse, neglect and exploitation duties;

It is the responsibility of all ICON staff members to guarantee that the rights of individuals are respected and protected while they are receiving ICON's services. Any ICON staff person who is found to have restricted or infringed on the rights of a program participant, including but not limited to acts of abuse as defined below, is subject to dismissal from employment for misconduct as provided for in ICON's Personnel Policies and Procedures.

“Abuse” means any act or failure to act by an employee or other person responsible for the care of an individual that was performed or was failed to be performed knowingly, recklessly, or intentionally, and that caused or might have caused physical or psychological harm, injury, or death to an individual receiving services. Examples of abuse include but are not limited to the following:

- Rape, sexual assault, or other criminal sexual behavior
- Assault or battery
- Use of language that demeans, threatens, intimidates or humiliates the person
- physical acts, such as hitting, kicking, scratching, hair pulling, pinching, choking or slapping
- Misuse or misappropriation of the person's assets, goods or property.
- Use of excessive force when placing a person in physical or mechanical restraint. (ICON does not permit staff to use any kind of restraint on consumers).

- Use of more restrictive or intensive services or denial of services to punish the person or that is not consistent with his individualized services plan. (ICON does not allow staff to use any form of punishment on consumers)
- neglect in care which is the failure to provide treatment, care, goods, or services necessary to the health, safety or welfare of a consumer
- condoning or permitting the abuse of a consumer

“Exploitation” means the misuse or misappropriation of the individual’s assets, goods, or property. Exploitation is a type of abuse. Exploitation also includes the use of a position of authority to extract personal gain from an individual. Exploitation does not include the billing of an individual’s third party payer for services. Exploitation does not include instances of use or appropriation of an individual’s assets, goods or property when permission is given by the individual or his authorized representative: with full knowledge of the consequences, with no inducements, or without force, misrepresentation, fraud, deceit, duress of any form, constraint or coercion.

“Neglect” means the failure by an individual, program or facility responsible for providing services to provide nourishment, treatment, care, goods, or services necessary to the health, safety or welfare of a person receiving care or treatment for mental illness, mental retardation or substance abuse.

“Peer-on-peer aggression” means a physical act, verbal threat or demeaning expression by an individual against or to another individual that causes physical or emotional harm to that individual. Examples include hitting, kicking, scratching, and other threatening behavior. Such instances may constitute potential neglect.

As a condition of employment or volunteering, anyone who has reason to believe that an individual may have been abused, neglected or exploited must immediately report this to the Executive Director.

The Executive Director shall immediately take steps to protect the individual until an investigation is complete. This may include the following:

- Direct the employee(s) involved to have no further contact with the individual. In the case of incidents of peer-on-peer aggression, protect the individuals from the aggressor in accordance with sound therapeutic practice and these regulations.
- Temporarily reassign or transfer the employee(s) involved to a position that has no direct contact with individual’s receiving services.
- Temporarily suspend the involved employee(s) pending completion of an investigation.
- Immediately notify the human rights advocate and the authorized representative within 24 hours.

- Retaliation against an employee who reports abuse to an outside entity is forbidden.
- Initiate or cooperate with an impartial investigation within 24 hours. The investigation shall be conducted by a person trained to do investigations and who is not involved in the issues under investigation.

- With the consumer's permission, members of the consumer's family should be contacted and advised of the situation. If the consumer has a Case Manager or Residential Program Manager, these individuals should also be contacted. The individual's residential staff or family (if applicable) should also be asked to monitor changes in the consumer's behavior.
- Prior to initiating an internal investigation, the Executive Director will notify the Adult Protective Services Division of the Department of Social Services which represents the consumer's county of residence. An individual Social Worker will be assigned to assist with the investigation.
- The investigator will make a final report to the Executive Director or investigating authority and to the Human Rights Advocate within ten working days of appointment.
- The Executive Director will, based on the investigator's report and any other available information, decide whether abuse, neglect, or exploitation occurred and take appropriate action and document such action.
- Within seven working days following the completion of the investigation, the Executive Director will notify the individual, the Legally Appointed Representative (if applicable), the Human Rights Advocate, the investigating authority, and the involved employee or employees.
- The Executive Director will cooperate fully with any external investigations.
- If the Executive Director has reason to suspect that the incident of abuse, neglect, or exploitation is a crime, the Director shall immediately contact law enforcement authorities and cooperate fully with any investigation that may result.
- If the individual affected by the alleged abuse, neglect or exploitation or the Legally Authorized Representative (if applicable) is not satisfied with the outcome of the investigation, the individual or anyone acting on the individual's behalf may file a petition with the Local Human Rights Committee for a hearing at any time within ten working days of notification of the outcome of the initial investigation. Procedures for filing for such a hearing, as documented in 12 VAC 35-115-180, shall be provided to the individual or the individual's Legally Authorized Representative upon request.

1. **Services**

Anti-Discrimination

ICON does not discriminate against applicants. Services must be delivered regardless of race, religion, ethnicity, age, sex, sexual orientation, disability, or ability to pay. These policies are reviewed by the governing board on an annual basis. However, factors of sex, age and nature and/or severity of disabling condition may be such as to prohibit receipt of services due to limitations of ICON's capabilities.

If individual receiving services considers discrimination to have taken place, the individual or anyone acting on the individual's behalf may file a complaint with the Executive Director. The Executive Director will initiate an investigation immediately and will within ten days make a decision, take action, and document that action. This documentation will then be forwarded to the individual, the Human Rights Advocate, and any employees involved. If the individual or his Legally Authorized Representative is not satisfied with the decision, he may file a petition for an LHRC hearing. Procedures for filing for such a hearing, as documented in 12 VAC 35-115-180, shall be provided to the individual or the individual's Legally Authorized Representative upon request.

Clinical Services

ICON does not provide clinical services beyond occasional psychological testing and behavior consultation. Any clinical services provided through ICON are performed by Dr. Celeste Campbell, Psy.D., a licensed clinical psychologist, and are provided in a manner consistent with sound therapeutic practice.

Emergencies

An "Emergency" is a situation that requires a person to take immediate action to avoid harm, injury, or death to an individual receiving services or to others.

ICON has various policies and procedures covering both public and individual emergencies. These policies may be found in ICON's personnel and program policies and procedures documents.

Regardless of the nature of the emergency, ICON will notify the individual's Legally Authorized Representative, if applicable, if any emergency results in harm or injury to an individual receiving ICON's services. Any such emergency will also be documented through the incident reporting procedure; documentation pertaining to incident reporting becomes a part of the individual's permanent file.

Screening and Assessment, Service Plans, and Separation From Services

ICON's procedures for screening and assessment vary by type of service. The procedures are documented in ICON's program policy documents.

“Individual Services Plan or ISP” means a comprehensive and regularly updated written plan that describes the individual’s needs, the measurable goals and objectives to address those needs, and strategies to reach the individual’s goals. An ISP is person-centered, empowers the individual, and is designed to meet the needs and preferences of the individual. The ISP is developed through a partnership between the individual and the provider and includes an individual’s treatment plan, habilitation plan, person-centered plan, OR plan of care.

Every individual receiving ICON's services has an individualized service plan, and all services are delivered according to this plan. The exact nature of these plans varies depending upon the individual and the type of services received, but all plans are prepared with the full participation of the consumer as well as others the consumer may wish to include in the process, and are subject to ongoing review.

When services are delivered as a response to crisis or emergency, these services are thereafter documented as part of the individual’s services plan.

“Discharge Plan” means the written plan that establishes the criteria for an individual’s discharge from a service and identifies and coordinates delivery of any services needed after discharge. When individuals are separated from ICON's services for any reason, a ‘Separation from Services Form’ is prepared and forwarded to the individual and members of the individual's interdisciplinary team. With the individual’s or the individual’s authorized representative’s authorization, providers may involve family members in services and discharge planning. When the individual or his authorized representative requests such involvement, the provider shall take all reasonable steps to do so.

The Director of Employment Services and the Director of Community Living Services are responsible for screening and assessment practices, individualized services plans, and separation planning in their respective services. They are also responsible for ensuring that entries in individual services records are authentic, accurate, complete, timely, and pertinent.

2. Participation in Decision Making _____

Each individual has a right to participate fully in any decisions affecting the nature of services received. These rights include the right to:

- Participate meaningfully in planning, implementation, and changes to the individualized services plan.
- Object to any part of a services plan.
- Have a Legally Authorized Representative to make decisions when the individual receiving services lacks the capacity to give informed consent;

however the individual may formally object to any decision which allows a Legally Authorized Representative to make such decisions.

- Be accompanied by a person the individual trusts as his representative when participating in services planning.
- Request admission or discharge from any service at any time.
- Services record shall include the signature or other indication of the individual's or his authorized representative's consent.

The idea of consumer-directed services is at the core of ICON's value system. It is ICON's responsibility to help each individual develop the skills and the mindset needed to take control of decisions affecting the services received.

3. Informed Consent _____

Individuals receiving services from ICON have the right to give or withhold consent for a plan of service, participation in research, or disclosure of information maintained by ICON in the individual's service record, except as provided in the section on Confidentiality below. The individual's consent to the plan of services is documented by signature on the services plan itself.

Capacity to Give Consent

If the capacity of an individual to give consent is in doubt, ICON will ensure that an evaluation will be conducted by a professionally qualified individual not directly involved with the individual.

If an individual or family member objects to the outcome of such an evaluation, it may be challenged following the procedure set out in 12 VAC 35-115-70(B)8.

ICON will delay provision of services for which consent is required, and will delay the appointment of a Legally Authorized Representative, until the outcome of an independent evaluation is obtained.

Appointment of a Legally Authorized Representative

If it is determined that an individual lacks the capacity to give consent, ICON will designate a Legally Authorized Representative. ICON's Executive Director will have primary responsibility for the identification and appointment of the Legally Authorized Representative

Persons eligible to be appointed as Legally Authorized Representatives are (in the following order):

- (1) An attorney-in-fact authorized to give consent under a durable power of attorney, or a legal guardian of the individual not employed by ICON;
- (2) The individual's next of kin, in the following order: spouse, adult child, parent, adult brother or sister, or any other relative, *unless* a person in a lower priority is clearly better qualified. If the individual expresses a preference for one family member over another in the same category, the Director shall appoint that family member.
- (3) If no other person is available, a provider may appoint a 'next friend' of the individual, after a review and finding by the LHRC that the proposed next friend has shared a residence with or provided support and assistance to the individual for a period of at least six months prior to the designation, the proposed next friend has appeared before the LHRC and agreed to accept these responsibilities, and the individual has no objection to the proposed next friend being appointed Legally Authorized Representative.

If an individual who has a Legally Authorized Representative objects to a plan of service, participation in research, or the disclosure of information, ICON has the obligation to immediately notify the Human Rights Advocate and the Legally Authorized Representative.

ICON must review the individual's capacity to consent at least every six months or as the individual's condition warrants. A review may also be requested by the consumer at any time and such request will be acted upon in a timely manner. Such review must be documented in the individual's service record and communicated in writing to the consumer and the Legally Authorized Representative. If it is determined by a qualified professional that the individual will never have capacity, or will never regain capacity, this fact may be documented in the service record and six-month reviews need not be performed.

As stated above, any individual receiving ICON's services may request discharge from the program at any time. Such a request will be acted upon as soon as possible (it should be noted that ICON is a completely community-based service and as such has no control over whether a person is actively receiving services, i.e., an individual may leave the program simply by failing to attend if that is his wish.) All requests for separation from services will be honored without threat of punishment or reprisal, and will not affect the individual's eligibility to receive services in the future.

4. Confidentiality

Each individual is entitled to have all information that a provider maintains or knows about remain confidential, and has the right to give or not give consent before such information is shared with a third party, except as detailed below.

ICON has the responsibility to tell all individuals receiving services, and their Legally Authorized Representatives (if applicable), about their right to confidentiality and under what circumstances a third party might get information without the individual's consent.

ICON also has the responsibility to take all reasonable steps to preserve the confidentiality of consumer information, including maintaining such information in a locked filing cabinet and encrypting any such information which is electronically transmitted.

With the exception of the situations detailed below, ICON must have written consent to share any information from the individual's service record with any third party, including family and friends of the individual receiving services. Such consent is generally obtained in the form of a release document, which remains in effect for one year from date of signing, unless revoked sooner by the individual receiving services.

When such information is shared, a cover sheet shall be attached informing the person receiving the information that it must not be disclosed to anyone else unless the individual consents or unless the law allows or requires further disclosure without consent.

Job-related information of the kind routinely required of job applicants is not considered to be a confidential part of the individual's service record, and may be shared with potential employers of those receiving job development services without requiring such notice.

Upon request, ICON will tell individuals the source of information contained in their service records and the names of anyone other than employees or agents of the provider who has received information from them.

ICON may disclose information without consent in the following situations:

- Emergencies – Specific information may be disclosed to any person who needs that particular information for the purpose of preventing injury, death, or substantial property destruction in an emergency.
- ICON Employees – Information may be shared with any full-time or part-time employee, consultant, agent, legal counsel, or contractor of ICON without specific written consent.

- Funders – ICON may share with funding agents such information as is necessary to give services or to get payment for the services.
- Court Proceedings – Information may be disclosed as part of a legal proceeding, as detailed in 12 VAC 35-115-80(C)d.
- Human Rights Committees and Protection and Advocacy Agencies – Information may be disclosed to these entities as necessary for the conduct of their responsibilities under these regulations.
- Others Authorized by the Commissioner – ICON may disclose information if authorized or required by the Commissioner, CSB, or private program director for the following activities: licensing; hearings, reviews, or appeals; evaluation of provider performance and individual outcomes; statistical reporting; preauthorization, utilization reviews, financial and related administrative services reviews and audits; or similar oversight and review activities.

If information is disclosed without consent to anyone other than employees of DMHMRSAS, CSB, or other provider, ICON will take the following steps before (or in an emergency, immediately afterward):

- Put a written notation of the information disclosed, the name of the person who received the information, the purpose of the disclosure, and the date of disclosure in the individual's permanent record.
- Give the individual or his Legally Authorized Representative, if applicable, written notice of the disclosure, including the name of each person who received the information and the nature of the information.

5. Access to and Correction of Service Record _____

Each individual receiving services, and the Legally Authorized Representative (if applicable) has a right to see, read, and get a copy of his own services record. The individual also has a right to challenge, correct, or explain anything in the service record.

Each consumer or Legally Authorized Representative (if applicable) has the right to inspect or duplicate (at his own expense, \$1.00 for the first one, two, or three pages and \$.10 per page thereafter) any records pertaining to the consumer, unless the person's treating physician, after personally reviewing the records, has made a part of such person's record a written statement that in his/her opinion, a review of such records would be injurious to the individual's physical or mental health, or well-being. Where disclosure is limited or denied, disclosure shall be made upon request to any lawyer, physician, or psychologist designated by the consumer or Legally Authorized Representative, and the Human Rights Advocate will be notified of the action. Such action will also be documented in the individual's record.

ICON will provide consumers with any help they may need to read and understand their service records and provide corrections to them. If an individual asks to challenge, correct, or explain any information contained in his services record, ICON staff will investigate and file in the services record a written report concerning the individual's request. If the report finds that the services record is incomplete, inaccurate, not timely, or not necessary, ICON will:

- Remove that portion of the services record or clearly mark it with the report's findings;
- Not disclose the original services record without specific consent or legal authority; and
- Promptly notify in writing all persons who have received the incorrect information that the services record has been corrected and request that recipients acknowledge the correction.

If the report does not result in action that is satisfactory to the individual, a statement shall be filed in the services record explaining the individual's position. In this eventuality, ICON will:

- Give all persons who have copies of the record a copy of the individual's statement; and
- Clearly note in any later disclosure of the record that it is disputed and include a copy of the statement with the disputed record.

6. Restriction on Freedoms of Everyday Life _____

"Restriction" means anything that limits or prevents an individual from freely exercising his rights and privileges.

ICON is firmly committed to the principle of the least restrictive environment, and will encourage each individual served to take full advantage of opportunities in the community. However, ICON's services are provided for only limited parts of a person's day and ICON generally has no control over the freedoms accorded to individuals when they are not participating in ICON's services.

7. Use of Seclusion, Restraint, and Time-Out _____

ICON does not use seclusion, restraint, or time-out, as defined in 12 VAC 35-155-30.

8. Work

ICON does not maintain a sheltered workshop or facility of any kind. ICON's employment services are focused on assisting individuals to find and maintain jobs in the community. ICON therefore has no ultimate control over whether individuals receiving services will be offered employment, or what the wage will be. ICON endeavors to ensure that all employers act in accordance with the Fair Labor Standards Act (29 USC § 201 et seq.).

From time to time ICON does employ individuals on a temporary or long-term basis who have received or are currently receiving services. Such individuals are employed at the same wage and under the same conditions as any ICON employee in similar jobs. The policy of ICON is, and will continue to be, to provide employment based on merit without regard to race, color, religion, national origin, disability not affecting work performance, sex or age, except where sex or age is an essential bona fide occupational requirement.

9. Research

ICON does not conduct human research under the definition found in 12 VAC 35-115-30. ICON may from time to time participate in historical research for quality assurance or research purposes. Individual written consent will be obtained for any such projects, and no personally identifying information will be revealed either to research partners or to the public at large as a result of such research.

ICON also uses aggregate consumer data as a part of its annual Performance Improvement Guide. Many parts of the Performance Improvement Guide are mandated by our funding sources and as such fall into the category of information that may be released without individual written consent. Such data is always presented in the aggregate, or with all personally identifying components removed, so that individual confidentiality is preserved.

E. Complaint Resolution, Hearing, and Appeal Procedures

Any individual who is receiving services from ICON or is a Legally Authorized Representative of such an individual has the right to file a complaint if they feel that ICON has violated any of the rights set forth in this document.

ICON will take any such complaint seriously and will make every effort to resolve complaints as quickly as possible. Under no circumstances will the filing of a complaint be met with retaliation or any other type of negative response.

Informal Complaint Process

Anyone who believes that ICON has violated an individual's rights may report the alleged violation to the Executive Director or the Program Director for the program in which the individual participates. ICON will attempt to resolve any such complaints immediately. If the complaint is resolved within five days in a manner satisfactory to the individual or the Legally Authorized Representative, no further action is required.

Formal Complaint Process

If an informal complaint is not resolved within five working days, or is not resolved to the individual's satisfaction, or if the individual chooses not to pursue the informal complaint process, the matter will be reported to the Human Rights Advocate immediately. The Executive Director will first try to resolve the complaint by meeting within 24 hours with the individual, any representative the individual chooses, the Human Rights Advocate, and others as appropriate, and by conducting an investigation if necessary. ICON will give the individual and his chosen representative a written decision and an action plan within ten working days of receiving the complaint. However, if the Human Rights Advocate concludes, after an initial investigation, that there is substantial risk that serious and irreparable harm will result if the complaint is not resolved immediately, the human rights advocate shall inform the Director, the provider, the provider's governing body, and the LHRC, and the LHRC will hold a preliminary hearing within 72 hours of receiving the information.

If the individual is not satisfied, he may respond to the Executive Director in writing within five working days after receiving the written decision and action plan. The Executive Director shall respond within ten working days with a written decision and action plan to be forwarded to the individual and his chosen representative as well as the Human Rights Advocate.

If the individual is still unsatisfied, he may within ten days file a petition for a hearing with the Local Human Rights Committee, and may request the assistance of the Human Rights Advocate in filing such a petition. ICON will cooperate with the Committee by attending meetings as requested and providing copies of all paperwork relating to the complaint in a timely manner.

If the individual remains unsatisfied, he may appeal to the State Human Rights Committee.

F. Reporting

Any suspected incidence of abuse or neglect will be reported to the Human Rights Advocate as detailed in Section D.2 of this document.

Any instance of serious injury or death while receiving services from ICON will be reported by telephone to the Legally Authorized Representative, if applicable, within 24 hours of discovery. For all individuals with case management services, the Case Manager will be notified by telephone within the next business day, as well as through the standard incident reporting mechanism, which is the same as that set out in Section D.2 above in the context of reports of abuse and neglect, which includes among other things the date and place of the incident, the nature of the injuries and treatment received, and the circumstances surrounding the death or injury. For individuals in licensed programs, the incident will be reported to ICON's Licensing Specialist on Form DMH 966E 1156.

ICON does not practice seclusion or restraint as defined in 12 VAC 35-115-30. This fact will be confirmed in an annual report made to the Human Rights Advocate on or before January 15th of each year for the previous calendar year.

In any month in which a complaint of a human rights violation is active, ICON will report to the Human Rights Advocate the type, resolution level, and findings of each complaint. ICON will also provide such a report at any time upon request from the Human Rights Advocate. Upon notice from the Department, ICON will provide these reports on forms or in a format provided by the Department.

G. Responsibilities and Duties

To ensure compliance with the Human Rights regulations, ICON will:

- Identify a person or persons accountable for helping individuals to exercise their rights and resolve complaints regarding services. This person will be the Program Director for Employment Services or the Program Director for Community Living Services, depending upon the program in which the complaint arises.
- Comply with all state laws governing allegations of abuse, neglect, or exploitation.
- Require competency-based training on these regulations upon employment and at least annually thereafter for all employees. Documentation of such training will be maintained in the employee's permanent file.

- Submit to the Local Human Rights Committee for review and comment any policies, procedures, or practices that may affect individual rights.
- Ensure that all services are provided in compliance with this document and with 12 VAC 35-115.

In addition, individual employees of ICON are responsible for:

- Becoming familiar with the Human Rights regulations and ICON's Human Rights Policies and Procedures, and complying with them in all respects
- Helping individual consumers to understand and assert their rights.
- Protecting individuals from any form of abuse, neglect, or exploitation, and reporting any suspected incidence of abuse, neglect, or exploitation to the Executive Director without delay.
- Cooperating with any investigation, meeting, hearing, or appeal held under the regulations published at 12 VAC 35-115.