



GREAT PROVIDER PLAYBOOK

Insights you can act on from OPRA Human Rights Committee

The Human Rights Committee (HRC) is a formal oversight review body responsible for evaluating and approving any rights restrictions, restrictive measures, or behavior supports that impact an individual’s rights. The HRC ensures that interventions are justified, person-centered, and implemented in the least restrictive manner possible. At its core, the HRC exists to protect individual rights while balancing health, safety, and individual needs.

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| <p>Role of HRCs</p> | <p>The HRC serves as an important safeguard to ensure that any limitation on an individual’s rights is:</p> <ul style="list-style-type: none"> • Aligned with the individual's assessed needs and supported by data. • The least restrictive option available. • Time-limited and reviewed at regular intervals. • Implemented with informed consent. <p>A strong HRC oversight process demonstrates that providers are not only identifying risks, but actively protecting the rights, dignity, health and safety of the individuals they support.</p> |
| <p>When is HRC Review Required?</p> | <p>HRC review is required anytime a proposed intervention or plan may restrict or limit an individual’s rights. This commonly includes:</p> <ul style="list-style-type: none"> • Behavior supports with aversive or restrictive measures; • Limitations on movement, access, or personal property; • Use of monitoring systems (as applicable under rule); • Rights modifications or restrictions tied to individual health, safety, or mitigation of risk. <p>Providers must ensure that no restrictive measure is implemented without appropriate HRC review and approval. In emergency situations, staff may need to take immediate action to protect an individual or others from immediate harm, even if no approved plan is in place. In this instance, staff must immediately document the incident thoroughly. The team and committee should then meet as soon as possible to review the incident and determine if ongoing supports are needed. If additional restrictive measures are needed, this must also be submitted to the HRC for further approval.</p> |
| <p>HRC Composition & Requirements</p> | <p>Regulation and survey guidance require that the HRC be structured to ensure objective, informed decision-making. The committee must:</p> <ul style="list-style-type: none"> • Be multidisciplinary in nature. No specific disciplines required, but multiple perspectives must be represented. At least 1 member must have experience with behavior support practices. • Include members with no ownership or controlling interest in the facility. • Include facility staff such as a QIDP, nurse, supervisor, administrator, DSP, etc. • Include community members not employed by the agency. • For ICFs, federal regulation dictates that the committee must be made up of at least a “quorum”. The quorum should be defined by the facility and referenced in policy. DODD guidance states that the HRC must be at least 4 people. |

Human Rights Committee

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| <p>Process for Restrictive Measures</p> | <p>Providers must follow a structured, compliance-driven process when implementing restrictive measures. The numbered steps below have been identified by DODD as the process to follow when developing a plan with a restriction.</p> <ol style="list-style-type: none"> 1. Assessment in the last 12 months identifying risk of harm 2. Strategies addressing risk of harm developed 3. Informed consent obtained 4. Individual / guardian notified of HRC meeting 5. HRC Approval or Denial 6. Restrictive Measures Notification (RMN) form completed and submitted 7. Staff trained on plan / strategies 8. Implementation of restrictive measures 9. Team review within 90 days |
| <p>Compliance</p> | <p>Surveyors evaluate restrictions by asking key questions. Great providers can stay ahead by answering those questions before the survey ever begins.</p> <ul style="list-style-type: none"> • Was the restriction approved before implementation? • Is it linked to the OhioISP? • Was informed consent obtained? • Is there data demonstrating necessity? • Is there a plan to remove the restriction / is it time-limited? |
| <p>Resources</p> | <p>Behavior Support Rule DODD Behavior Strategies and Restrictive Measures DODD Restrictive Measure and HRC Information</p> |



For more information or resources on Human Rights Committees, please contact Rachel Hayes, Director of Residential Resources, at rhayes@opra.org.

The OPRA Advantage



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