DEPARTMENT OF BEHAVIORAL HEALTH AND DEVELOPMENTAL SERVICES
CORRECTIVE ACTION PLAN

License #: **18968-14-008**
Organization Name: **Infinite Impact LLC**

Date of Inspection: **07-23-2026**
Program Type/Facility Name: **14-008 Thrivewell Group**

Standard(s) Cited	Comp	Description of Noncompliance	Actions to be Taken	Planned Comp. Date
12VAC35-46-510. (1) - Each provider shall have written policies and procedures regarding the photographing and audio or audio-video recordings of residents approved by the Office of Human Rights that shall ensure and provide that: 1. The written consent of the resident or the resident's legal guardian shall be obtained before the resident is photographed or recorded for research or provider publicity purposes.	N	Thrivewell Group This regulation was NOT MET as evidenced by: The provider has four interior cameras at the location which was not approved by the Office of Human Rights.	PR) 07/26/2026 The issue leading to noncompliance was that four interior monitoring cameras were installed before the provider's Audio & Visual Recordings Policy and monitoring arrangement were submitted to and approved by the Office of Human Rights. The provider's previous policy did not contain sufficiently detailed procedures governing written informed consent before a resident is photographed or recorded for research or provider publicity purposes. Infinite Impact, LLC revised its Audio & Visual Recordings Policy to require written informed consent before a resident is photographed or recorded for research, provider publicity, marketing, social media, training, or another non-treatment purpose. Consent must be obtained from the resident when legally authorized and from the resident's parent or legal guardian, as applicable. The purpose, intended use, authorized recipients, voluntary nature of consent, and process for revoking consent for future use must be explained before consent is obtained. These requirements are included in Section A of the revised policy. The revised Audio & Visual policy was submitted to the Office of Human Rights on 7/26/2026 for final approval. As a systemic change, Infinite Impact, LLC will maintain a written photography and recording consent form. No photograph or recording of a resident will be created or used for research, publicity, marketing, social media, training, or another non-treatment purpose unless the required written consent is obtained and	8/3/2026

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			maintained in the resident's record. The Chief Operating Officer will review and approve any proposed research, publicity, marketing, social media, or training use before release. Consent documentation will be reviewed during quarterly resident-record audits. Corrective action within the provider's control was completed on 7/26/2026 through revision and submission of the policy. Final compliance is contigent upon receiving written approval from the Office of Human Rights. No residents will be admitted and monitoring will not be used during service delivery until the required approval is received. OLR) Accepted 07/27/2026	
12VAC35-46-510. (2) - Each provider shall have written policies and procedures regarding the photographing and audio or audio-video recordings of residents approved by the Office of Human Rights that shall ensure and provide that: 2. No photographing or recording by provider staff shall take place without the resident or the resident's family or legal guardian being informed.	N	Thrivewell Group This regulation was NOT MET as evidenced by: The provider has four interior cameras at the location which was not approved by the Office of Human Rights.	PR) 07/26/2026 The issue leading to noncompliance was that four interior audio and video monitoring cameras were installed before the provider's monitoring policy and arrangement were submitted to and approved by the Office of Human Rights. Although a sign stating "Smile, you're on camera" was posted on the front porch before entry into the residence, the sign did not specifically disclose the system's audio-recording capability and did not establish a formal process for individually informing residents and their parents or legal guardians before recording. Infinite Impact, LLC revised its Audio & Visual Recordings Policy to require written notification before admission. The written notice will explain the purpose and locations of monitoring, the system's audio and video capabilities, authorized	8/3/2026

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			access, storage and retention practices, confidentiality protections, and complaint rights. Staff will receive the policy during orientation and annual training, and monitoring will not be concealed. The revised Audio & Visual Recordings Policy was submitted to the Office of Human Rights on 7/26/2026 for final approval. The policy states that the system has audio and video recording capabilities and that monitoring will not be used during service delivery until Office of Human Rights approval is received. As an immediate corrective action, the existing porch sign stating "Smile, you're on camera" was replaced on 7/26/2026 with signage clearly stating that audio and video monitoring are in use on the premises. The updated sign is posted at the entrance before entry into the residence. No residents are currently admitted to the home. As a systemic change, notification of audio and video monitoring will be incorporated into the admission process. Before admission, each resident and parent or legal guardian will receive written notice of the monitoring practices and sign an acknowledgment confirming receipt. The signed acknowledgment will be maintained in the resident's record. Staff will receive training regarding the monitoring policy during orientation and at least annually. The Chief Operating Officer will verify that the required signage remains posted and legible before resident admission and during quarterly environmental inspections. The Chief Operating Officer will also verify completion of the written notification and acknowledgment process before each resident's admission and review	

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			acknowledgment documentation at least quarterly through the admission-record and Human Rights compliance audit process. Corrective action within the provider's control was completed on 7/26/2026 through revision and submission of the policy to the Office of Human Rights and replacement of the entrance signage. Final completion remains contingent upon written approval from the Office of Human Rights. No residents will be admitted, and interior audio or video monitoring will not be used during service delivery, until written approval is received. OLR) Accepted 07/27/2026	
12VAC35-46-510. (3) - Each provider shall have written policies and procedures regarding the photographing and audio or audio-video recordings of residents approved by the Office of Human Rights that shall ensure and provide that: 3. All photographs and recordings shall be used in a manner that respects the dignity and confidentiality of the resident.	N	Thrivewell Group This regulation was NOT MET as evidenced by: The provider has four interior cameras at the location which was not approved by the Office of Human Rights.	PR) 07/26/2026 The issue leading to noncompliance was that four interior audio and video monitoring cameras were installed before the provider's monitoring policy and arrangement were submitted to and approved by the Office of Human Rights. The provider's previous policy did not contain sufficiently detailed safeguards governing monitoring locations, authorized access, review, storage, retention, disclosure, and protection of resident dignity and confidentiality. Infinite Impact, LLC revised its Audio & Visual Recordings Policy to establish specific protections for resident dignity, privacy, and confidentiality. Interior monitoring is limited to approved common areas and the administrative office. Monitoring is prohibited in bedrooms, bathrooms, dressing or changing areas, confidential meeting spaces, and any other location where a resident has a reasonable expectation of privacy. The administrative office	8/3/2026

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			camera is maintained to protect resident records, employee personnel records, sensitive administrative information, agency equipment, and property. The revised policy further provides that monitoring will not replace required staffing or supervision and shall not be used for punitive, coercive, discriminatory, retaliatory, entertainment, or unrelated employee-performance purposes. Confidential meetings will occur in an unmonitored area or with appropriate privacy protections in place. Only the Chief Executive Officer and Chief Operating Officer are authorized to access live or recorded footage, and unauthorized access, copying, disclosure, alteration, or deletion is prohibited. Recordings will be maintained in secure, password-protected storage and protected under applicable confidentiality requirements. Footage will be disclosed only to legally authorized agencies or individuals, and both reviews and disclosures will be documented. Residents and parents or legal guardians may ask questions or make complaints regarding monitoring without retaliation. The revised Audio & Visual Recordings Policy was submitted to the Office of Human Rights on 7/26/2026, for final approval. As a systemic change, Infinite Impact, LLC established written procedures governing approved monitoring locations, permitted purposes, prohibited uses, authorized access, footage review, retention, disclosure, confidentiality, resident complaint rights, staff training, and approval of future monitoring changes. No residents are currently admitted,	

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			and interior audio or video monitoring will not be used during service delivery until written approval is received from the Office of Human Rights. The Chief Operating Officer will inspect camera locations and review authorized access, footage-review logs, disclosure records, posted notices, retention practices, malfunctions, and monitoring-related incidents at least quarterly. The review will be documented using the quarterly monitoring and Human Rights compliance checklist. The policy will also be reviewed annually and whenever monitoring practices or regulatory requirements change. Corrective action within the provider's control was completed on 7/26/2026 through revision and submission of the policy to the Office of Human Rights. Final completion remains contingent upon written approval from the Office of Human Rights. No residents will be admitted, and interior audio or video monitoring will not be used during service delivery, until written approval is received. OLR) Accepted 07/27/2026	
12VAC35-46-590. B. - The interior and exterior of all buildings shall be safe, properly maintained, clean, and in good working order. This includes, but is not limited to, required locks, mechanical devices, indoor and outdoor equipment, and furnishings.	N	Thrivewell Group This regulation was NOT MET as evidenced by: In review of the physical environment, there failed to be evidence that the interior and exterior were safe, properly maintained, and in good working order. There failed to be locks on the two bedroom doors utilized for individuals, the cooktop on the stove was severely cracked, there were loose boards and rotting rails on the front deck and a small hole on the stair board on the back deck. The provider is	PR) 07/26/2026 The issue leading to noncompliance was that several physical-environment concerns were not identified and corrected before the plant inspection. Specifically, locks had not been installed on the two bedroom doors designated for residents, the stove cooktop was severely cracked, a board on the front porch was loose, portions of the front porch railing were deteriorated, and a small hole was present in a stair board on the back porch.	7/24/2026

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		required to upload documented evidence of locks on the two bedroom doors utilized by individuals and repair/replacement of cooktop on the stove, loose boards and rotting rails on the front deck, and small hole on the stair board on the back deck with the CAP.	All corrective repairs were completed on 7/24/2026. Appropriate locks were installed on both bedroom doors to provide resident privacy while allowing authorized staff to gain access during an emergency. The stove with the severely cracked cooktop was replaced and confirmed to be in safe working order. The damaged board on the front porch was replaced, the deteriorated front porch railings were repaired and secured, and the small hole in the back porch stair board was repaired. The front and back porches, stairs, boards, and railings were inspected following the repairs to confirm that they were stable, safe, and in good working order. Photographic documentation showing the installed bedroom-door locks, replacement stove, replaced front porch board, repaired front porch railings, and repaired back porch stair board will be uploaded with this Corrective Action Plan. As a systemic change, Infinite Impact, LLC added bedroom doors and locks, kitchen appliances, furnishings, exterior porches, decks, stairs, boards, railings, walkways, and other environmental safety items to its physical-environment inspection checklist. The residence will be inspected before the admission of any resident, at least monthly thereafter, following severe weather, and whenever a safety or maintenance concern is reported. Any item presenting an immediate safety risk will be removed from use, or access to the affected area will be restricted, until the condition is corrected. The Chief Operating Officer or designee will	

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			complete and document monthly physical-environment inspections using the agency's physical-environment inspection checklist. The Chief Operating Officer will review the checklist and any related maintenance documentation monthly to ensure that identified concerns are corrected promptly. Completed checklists, photographs, receipts, invoices, and repair records will be maintained on site as evidence of ongoing compliance. Corrective action was fully completed on 7/24/2026. OLR) Accepted 07/27/2026	

General Comments / Recommendations:
The Licensing Specialist recommends the provider review regulations 12VAC46-510 and 12VAC46-590 for compliance.

The Licensing Specialist recommends the provider contact the Office of Human Rights to request approval for video recording devices.

The CAP is due by close of business on July 28, 2026.

I understand it is my right to request a conference with the reviewer and the reviewer's supervisor should I desire further discussion of these findings. By my signature on the Corrective Action Plan, I pledge that the actions to be taken will be completed as identified by the date indicated.

Melonie Beatty, Licensing Specialist	(Signature of Organization Representative)	Date

C = Substantial Compliance, N = Non Compliance, NS = Non Compliance Systemic, ND = Non Determined