

# The Office of Long-Term Living (OLTL) Heightened Scrutiny Evidentiary Information

The following table includes:

- Where the setting is located (locations that have the presumption of institutional qualities and therefore, the possibility of isolating individuals from the broader community due to the service location’s physical location),
- OLTL’s Heightened Scrutiny determination on whether the service location currently meets, or will meet, waiver and regulatory requirements to overcome the presumption of having institutional qualities,
- The HCBS Rule requirement that was measured,
- Waiver requirements specific to services funded by OLTL used to measure Home and Community Based Settings (HCBS) Rule compliance, and
- Information reviewed by OLTL to determine whether the service location currently meets, or will meet, regulatory and waiver requirements to overcome the presumption of having institutional qualities.

Service locations that OLTL determined have or will overcome the presumption of institutional qualities will be sent to the Centers for Medicare & Medicaid Services (CMS) (after public comment) for final review of compliance with the HCBS Rule.

In cases where there were modifications or additional conditions (participant restrictions) that would need to be justified in a participant’s person-centered service plan, those modifications or conditions were confirmed to be needed or justified.

### Home and Community Based Settings (HCBS) Quality Review

<b>Setting Name:</b>	Woods Services Inc. and Beechwood Neuro Rehab
<b>Setting Region:</b>	Southeast
<b>Setting Address (2 locations):</b>	36 Copperwood Dr. Langhorne, PA 19047-1600 469 East Maple Ave., Langhorne, PA 19047-1600
<b>Setting Type:</b>	Structured Day
<b>Brief description of setting:</b>	Setting has 2 activity rooms, computer room, lunchroom, large kitchen, physical therapy room, and staff offices. The office building has room with long table that seats approximately 20 participants.
<b>Review Date:</b>	June 6, 2022
<b>Number of Participants Served at Site</b>	45

<b>Reason for Category</b>	Characteristics to isolate participants from the greater community. Campus like setting location.
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<b>Overcomes the presumption of institutional qualities?</b>	Yes
<b>Evidence to support</b>	<p>Setting provides transportation for participants for different events and trips into the community.</p> <p>Participant Rights are posted in all Structured Day locations in a common area of the setting. Waiver participants know about and are encouraged to participate in community events. Participants are able to come and go any time they choose. Residential setting provides transportation to participants.</p> <p>Provider has accessible vans to transport participants to various locations for activities. Participants can freely to move on and off the property. All sites had activities and community events posted on the bulletin boards.</p> <p>Information about filing a complaint which includes an anonymous complaint is also posted in all Structured Day locations in a common area of the setting.</p>

<b>Expectation</b>	<b>What you might see (based on CMS suggested Exploratory Questions and the OLTL Assessment Tool)</b>	<b>Notes/Documentation to Support Expectation</b>
(i) The setting is integrated in and supports full access of individuals receiving Medicaid HCBS to the greater community, including...	N/A- please see responses to questions below.	
1. opportunities to seek employment and work in competitive integrated settings,	Participants having competitive jobs in the community. If not working in the community provider will offer access to assist in finding work.	Provider has a Vocational Service handbook. For individuals interested in paid employment, Beechwood NeuroRehab has a continuum of vocational services to assist participants attain employment.
2. engage in community life,	Participants having access to their choice of social/recreational activities in the community.	Participants are engaged in many activities: community and fund walks, beach trios, baseball game at Trenton Thunder, movies, Philadelphia flower show, etc.

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3. control personal resources,	N/A - Setting is not a residential setting and does not have access to participant funds.	
4. and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS.	Participants should not be steered to receive their health services from the provider (if available)? (ex: Primary Care Physician, Podiatrist, Dentist, Therapists) Participants should be provided access to health care services in the community. (ex: transportation, scheduling, staff support)	Provider has Resident Rights policy which states choice of healthcare provider and pharmacy. The following policies: Room and Board Agreement, and Activity Schedule-Community Events shows that participants receive services to the same degree as individuals not receiving Medicaid HCBS.
(ii) The setting is selected by the individual from among setting options including non-disability specific settings and an option for a private unit in a residential setting.	N/A-Not a residential setting.	
and setting options are based on the individual's needs, preferences	N/A-Not a residential setting.	
and, for residential settings, [based on the individual's] resources available for room and board.	N/A-Not a residential setting.	
(iii) Ensures an individual's rights of 1. privacy,	Health information should be kept private. (HIPAA) Participants' schedules of medications, diet restrictions, etc. should not be posted in a general open area for all to view.	Observed on-site that participant rights are posted in a common area of the setting.
(iii) Ensures an individual's rights of 2. dignity and respect,	Staff should address participants in the manner the person would like to be	Observed participants being treated with respect and dignity. Also, documented in participant

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	addressed. Staff should converse with waiver participants in the setting while providing assistance and during the regular course of daily activities. Also, a copy of participant rights should be posted in a common area of the setting.	rights which is posted in common area.
(iii) Ensures an individual's rights of 3. freedom from coercion,	Information about filing a complaint should be posted in an obvious location and in an understandable format. In addition, waiver participants should be able to file an anonymous complaint.	Observed information on filing a complaint which does include an anonymous complaint.
(iii) Ensures an individual's rights of 4. and freedom from restraint.	Participants should be free from coercion and/or restraint.	Documented in participant rights which is posted in a common area of the setting.
(iv) The setting optimizes, but does not regiment, individual initiative, autonomy, and independence in making life choices, including but not limited to, ~daily activities	The setting should ensure that participants are supported to make decisions and exercise autonomy to the greatest extent possible.	Provider stated that each participant is offered a schedule of structured day programs. The participant can request changes to that schedule to meet their needs and preferences by talking to their service coordinator.
(iv) Optimizes, but does not regiment, individual initiative, autonomy, and independence in making life choices, including but not limited to, ~physical environment	The setting should ensure that participants are supported to make decisions and exercise autonomy to the greatest extent possible.	Provider stated that each participant is offered a schedule of structured day programs. The participant can request changes to that schedule to meet their needs and preferences by talking to their service coordinator.
(iv) Optimizes, but does not regiment, individual initiative, autonomy, and independence in making life choices, including but	The setting should ensure that participants are supported to make decisions and exercise	Provider stated that each participant is offered a schedule of structured day programs. The participant can request changes to that schedule to meet their

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not limited to, ~and with whom to interact	autonomy to the greatest extent possible.	needs and preferences by talking to their service coordinator.
(v) Facilitates individual choice regarding services and supports, and who provides them	Participants should be free to choose with whom to interact during activities.	Provider stated that each participant is offered a schedule of structured day programs. The participant can request changes to that schedule to meet their needs and preferences by talking to their service coordinator.