


The Office of Developmental Programs (ODP)
Heightened Scrutiny Evidentiary Information for Community
Participation Support Service Locations
(Child Guidance Resource Centers Inc)

The following table includes:

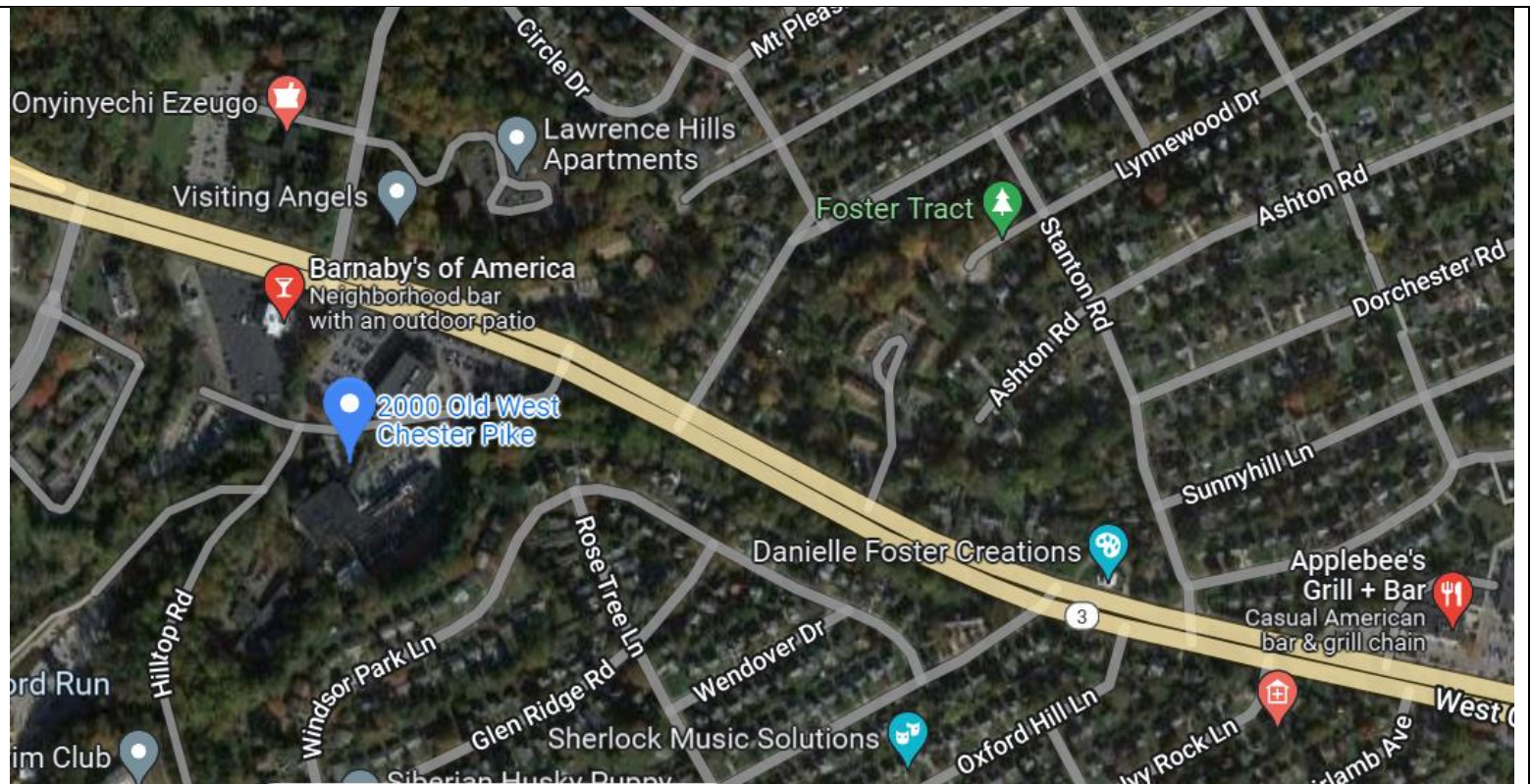
- where the CPS program is located (locations that have the presumption of institutional qualities and therefore, the possibility of isolating individuals from the broader community due to the service location’s physical location),
- ODP’s Heightened Scrutiny determination on whether the service location currently meets, or will meet, waiver and regulatory requirements to overcome the presumption of having institutional qualities,
- the HCBS Rule requirement that was measured,
- regulatory and waiver requirements specific to services funded by ODP used to measure HCBS Rule compliance, and
- the information reviewed by ODP to determine whether the service location currently meets, or will meet, regulatory and waiver requirements to overcome the presumption of having institutional qualities.

CPS service locations that ODP determined have or will overcome the presumption of institutional qualities will be sent to CMS (after public comment) for final review of compliance with the HCBS Rule.

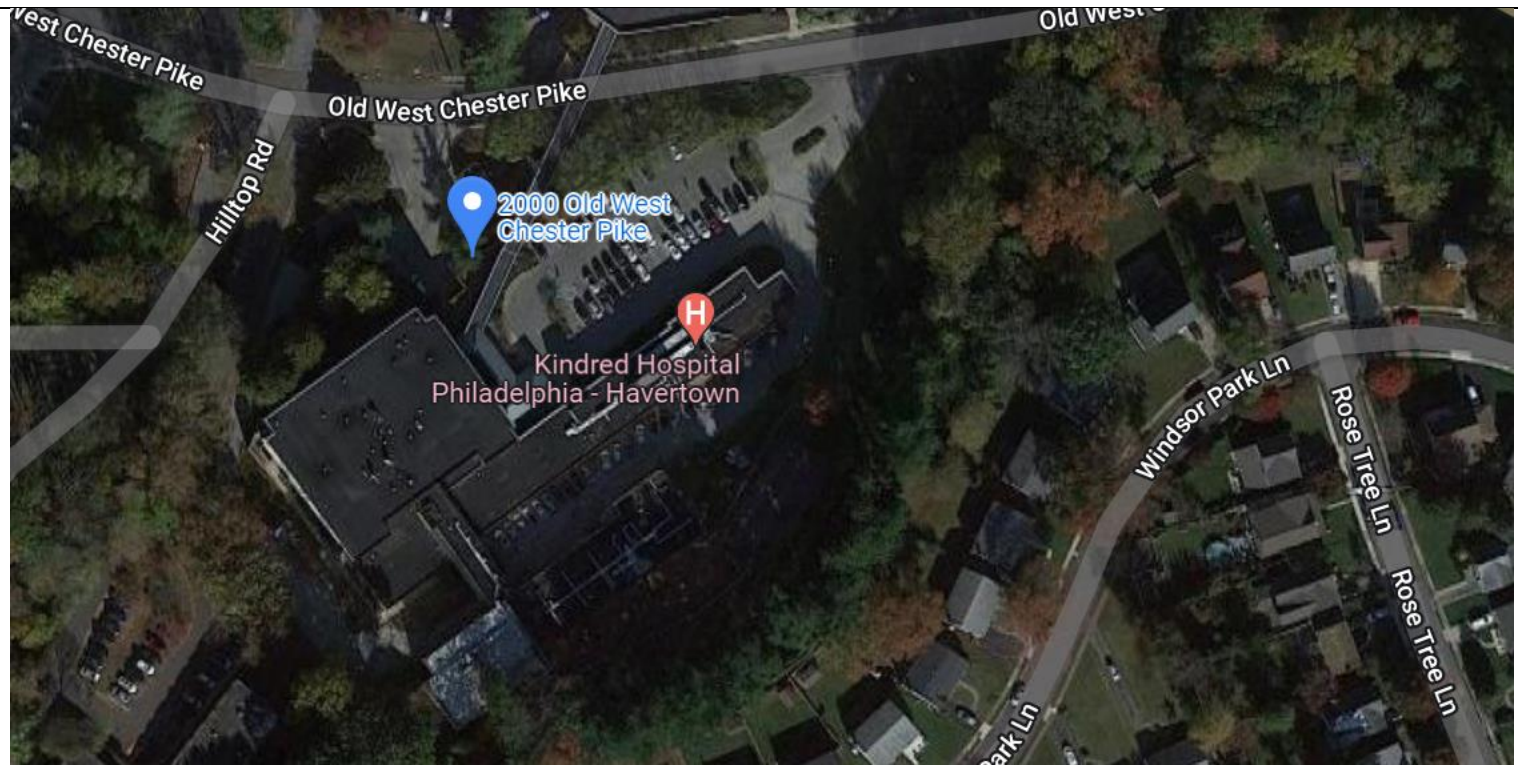
Service Location Name:	Child Guidance Resource Centers Inc
Service Location Address:	2000 Old West Chester Pike, Havertown, PA 19083
Onsite Visit Date:	3/2/22
Licensing Visit Date:	6/6/22
The CPS program is located:	<input type="checkbox"/> In a building located on the same property as an Intermediate Care Facility for individuals with an Intellectual Disability (ICF/ID) <input type="checkbox"/> Immediately adjacent to a public institution (ICF) <input checked="" type="checkbox"/> In a building that is also a public or privately operated facility that provides inpatient Institutional treatment (Hospital/SNF)
ODP’s Heightened Scrutiny Determination: Does the Service Location Overcome the	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Presumption of Institutional Qualities:	
Service Location Summary:	<p>Child Guidance Resource Center's CPS program provides recreation and socialization for individuals with ID/A. The program assists with skill developmental and social independence. This is done through recreational activities, such as crafts, dances, baking, and field trips. To learn more, please visit the program's website: https://www.cgrc.org/services/1/adult-services</p> <p>This service location had an onsite visit that confirmed the service location is in the same building as a hospital (Kindred Hospital Philadelphia-Havertown Hospital). The front door is shared with the hospital, but that is it; no services or staff are shared between the CPS program and hospital. The service location does not isolate the individuals who attend the CPS program from the broader community.</p> <p>Child Guidance Resource Center's CPS program is located among neighborhoods and other community areas. Some of these places include: Baraby's of America, Foster Tract, Danielle Foster Creations, Sherlock Music Solutions, etc.</p> 

Aerial View of the Service Location:



View of the Hospital showing that Child Guidance Resource Center's CPS program is located in the same building:



Child Guidance Resource Centers Inc		
CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
<p>The setting supports opportunities to engage in community life, including seeking employment and working in competitive integrated settings.</p>	<ul style="list-style-type: none"> 6100.261 <i>The provider shall provide the individual with the assistance necessary to access the community in accordance with the individual plan.</i> 6100.262(a) <i>The provider shall provide active and ongoing opportunities and information about employment options appropriate for the individual.</i> 	<ul style="list-style-type: none"> ISPs, Progress Notes, Staff training Records, Monthly Activity Calendar, Observations, Individual Rights Document, Individual Interviews, & Staff Interviews. <ul style="list-style-type: none"> Individuals were given choices to participate in activities in the community. <ul style="list-style-type: none"> Bowling, movies, restaurants, shopping centers, Dave and Busters, Cow Town,

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CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
	<ul style="list-style-type: none"> • <i>6100.443 The individual shall have the same degree of community access and choice as an individual who is similarly situated in the community who does not have a disability and who does not receive an HCBS.</i> • <i>6100.182(k) An individual has the right to choose where, when, and how to receive needed services.</i> • <i>6100.181(b) The provider shall educate, assist, and provide the accommodation necessary for the individual to make choices and understand the individual's rights</i> • <i>6100.182(e) An individual has the right to make choices and accept risks</i> • <i>6100.182(f) An individual has the right to refuse to participate in activities and services</i> • <i>6100.182(g) An individual has the right to control the individual's own schedule and activities</i> 	<p>farmers markets, New Hope, Peddlers Village, festivals, Linvilla Orchards, Jim Thorpe, colonial theaters, etc.</p> <ul style="list-style-type: none"> ○ Calendars are posted. ○ Calendars are mailed to the individual's home. ○ Individuals are free to move around the service location and receive support as needed if they wish to be outside.
The setting ensures an individual's right of privacy.	<ul style="list-style-type: none"> • <i>6100.182(h) An individual has the right to privacy of person and possessions.</i> • <i>6100.182(i) An individual has the right of access to and security of the individual's possessions.</i> 	<ul style="list-style-type: none"> • ISP, Observation, Progress Notes, Staff Training Records, Individual Rights Document, Individual Interviews, & Staff Interviews. ○ Staff follow ISPs when the individual wants to use a private space for personal care. ○ Designated spaces were observed for individual's personal items at the service location. ○ Personal space observed for individuals to use the phone.
The setting ensures an individual's dignity and respect.	<ul style="list-style-type: none"> • <i>6100.50 Written, oral, and other forms of communication with the individual, and persons designated by the individual, shall</i> 	<ul style="list-style-type: none"> • ISPs, Staff Training Records, Service Notes, Individual Rights Document, Observation, Individual Interviews, & Staff Interviews.

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CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
	<p><i>occur in a language, and means of communication understood by the individual or a person designated by the individual.</i></p> <ul style="list-style-type: none"> • 6100.182(d) <i>An individual shall be treated with dignity and respect.</i> • 6100.182(m) <i>An individual has the right to assistive devices and services to enable communication at all times.</i> 	<ul style="list-style-type: none"> ○ Activities are adapted to each individual. ○ Staff work with individuals to build their own personal schedule. ○ Individuals have the right to choose when and where they took their breaks. ○ Staff communicate in a method of preferred communication stated and known by the individuals.
The setting supports opportunities to control personal resources.	<ul style="list-style-type: none"> • 6100.350(a) <i>Access to or the use of an individual's personal funds or property may not be used a reward or punishment.</i> 	<ul style="list-style-type: none"> • ISPs, Progress Notes, Staff Training Records, Staff Training Records, Individual Interviews, & Staff Interviews. ○ Individuals do not usually bring money to the service location, but if they did, staff would assist as needed.
The setting ensures an individual's freedom from coercion and restraint.	<ul style="list-style-type: none"> • 6100.51(c) <i>The provider shall permit and respond to an oral or written complaint from any source, including an anonymous source, regarding the delivery of a service.</i> • 6100.181(c) <i>An individual my not be reprimanded, punished, or retaliated against for exercising the individual's rights.</i> • 6100.182(l) <i>An individual has the right to voice concerns about the services the individual receives.</i> • 6100.343 <i>A restrictive procedure may not be used as retribution, for convenience of staff persons or as a substitute for staffing or appropriate services.</i> 	<ul style="list-style-type: none"> • ISPs, Progress Notes, Staff Training Records, Observations, Individual Rights Document, Acceptable Restraint Policy and Procedure, Individual Interviews, & Staff Interviews. ○ Complaint process posted throughout buildings near the phones & also discussed with individual at ISP meeting. ○ No restrictive procedures noted or observed.