

The Office of Developmental Programs (ODP) Heightened Scrutiny Evidentiary Information for Service Locations Determined to Not Meet the Criteria of Presumed to Have Institutional Qualities

The following tables include the Community Participation Support (CPS) and Residential service locations that had an onsite visit and were determined by ODP to be compliant with the HCBS Rule. The onsite visits verified that none of these service locations were in a physical location identified by the Centers for Medicare and Medicaid Services (CMS) as being presumptively institutional. In addition, ODP's overall review of all documentation for the service locations indicated that they met all the requirements of the CMS HCBS Rule. Therefore, the following service locations will not be submitted to CMS for review.

Community Participation Support Service Locations	
Service Location Name:	Inglis House
Service Location Address:	2560 Belmont Avenue, Philadelphia, PA 19131
Region:	Southeast
Onsite Visit Date:	2/16/22
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 type="checkbox"/> In a building that is also a public or privately operated facility that provides inpatient Institutional treatment (Hospital/SNF) <input checked="" type="checkbox"/> None of the above

<p>ODP's Heightened Scrutiny Determination: Does the Service Location Overcome the Presumption of Institutional Qualities:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Service Location Summary:</p>	<p>Connections Adult Day Program is a specialized day program with enhanced services supporting a diverse group of adults (ages 18 and older) offering stimulating programs promoting physical, emotional, and spiritual wellness. These programs help participants stay active and connected to the community and enhance independence and self-sufficiency. To learn more, please visit the program's website: https://www.inglis.org/programs-and-services/inglis-community-services/connections-adult-day-program</p> <p>This service location had an onsite visit which revealed that the program no longer operates in the same building as a skilled nursing facility. The program moved down the road to one of the buildings which are part of Inglis Gardens at Belmont, containing 80 accessible and affordable apartments, half of which are reserved for individuals with disabilities who are transitioning from long-term/nursing home environments to independent living. As a result of the move, the service location does not meet the criteria of presumed to have institutional qualities based on its physical setting.</p> <p>The service location is integrated in the community northeast of downtown Philadelphia and is surrounded by many residential homes and city parks that inhabit both sides of the Schuylkill River. It is along a public bus route and only a few minutes by vehicular travel from major streets which host restaurants, community medical services and supports, and other community spaces such as theaters and museums.</p>

Service Location Name:	Typical Life Corporation Gettysburg
Service Location Address:	545 Long Lane, Gettysburg, PA 17325
Region:	Central
Onsite Visit Date:	4/4/22
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 type="checkbox"/> In a building that is also a public or privately operated facility that provides inpatient Institutional treatment (Hospital/SNF) <input checked="" type="checkbox"/> None of the above
ODP's Heightened Scrutiny Determination: Does the Service Location Overcome the Presumption of Institutional Qualities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Service Location Summary:	<p>TLC Gettysburg combines community integration and skill development with a strong health and fitness education. The services rendered at this service location help with self-care, communication, community participation and socialization. To learn more, please visit the program's website: https://typical-life.org/services/day-program-services/</p> <p>The service location received an onsite visit at which point it was clarified that the program shares the Charlie Sterner Building with the Borough of Gettysburg Department of Parks and Recreation office, adjacent to a facility that provides inpatient institutional treatment – WellSpan Gettysburg Hospital. The building itself is situated in the middle of Gettysburg Recreation Park. This clarification indicates that TLC Gettysburg does not meet the criteria of presumed to have institutional qualities based on its physical setting.</p> <p>The service location is situated inside the borough's park, next to a hospital, but also near residential neighborhoods, restaurants, stores such as Rite Aid, and a hardware store. It is a short walk from several</p>

	historical museums as well as Gettysburg National Cemetery and Gettysburg National Military Park. Gettysburg is a popular and essential piece of United States history, so many sites in and around the town feature pieces of Civil War history.
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Service Location Name:	Abington Health Adult Day Services-Lansdale
Service Location Address:	51 Medical Campus Drive, Lansdale, PA 19446
Region:	Southeast
Onsite Visit Date:	2/17/22
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 type="checkbox"/> In a building that is also a public or privately operated facility that provides inpatient Institutional treatment (Hospital/SNF) <input checked="" type="checkbox"/> None of the above
ODP's Heightened Scrutiny Determination: Does the Service Location Overcome the Presumption of Institutional Qualities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Service Location Summary:	<p>Abington Health Adult Day Services-Lansdale is a dually licensed Office of Developmental Programs and Department of Aging day program. It serves individuals who require some nursing care as part of their daily routine but also incorporates individual preference into its community activities. As a result of the dual licensure, the program supports individuals of differing ability and accommodates them with time in the community as they desire and are able to participate in.</p> <p>While this program initially was indicated as located in a building that is also a public or privately operated facility that provides inpatient institutional treatment. After the onsite for this service location was held, it was determined that it does not meet the criteria of presumed to have the qualities of an institution based on its</p>

	<p>physical setting. The service location is in a building on the grounds of the Jefferson Lansdale Hospital, however it is not in the primary hospital building. A further review of the other offices at this location indicate that they handle outpatient care, and there is an administrative office for a visiting nurse non-profit as well.</p> <p>The service location is near a bus route and residential neighborhoods, as well as restaurants and stores such as Hearth Bakery, Tigers Family Restaurant, Biryani Bowl, City of Joy grocery store, and Napa Auto parts.</p>
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Service Location Name:	Royer-Greaves School for Blind
Service Location Address:	118 South Valley Road, Paoli, PA 19301
Region:	Southeast
Onsite Visit Date:	3/10/22
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 type="checkbox"/> In a building that is also a public or privately operated facility that provides inpatient Institutional treatment (Hospital/SNF) <input checked="" type="checkbox"/> None of the above
ODP's Heightened Scrutiny Determination: Does the Service Location Overcome the Presumption of Institutional Qualities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Service Location Summary:	<p>The Royer-Greaves adult training program serves participants ages 21 and up, both sighted and visually impaired individuals. Participants can work on skills, enjoy preferred activities and increase independence. Activities into the community include the local library and stores where life skills are practiced. Several performances also bring the community to this service location throughout the year. To learn more, please visit the program's website: https://royer-greaves.org/adulttraining/.</p>

	<p>The program received an onsite visit where it was determined that the school where the program is hosted is not an Intermediate Care Facility for individuals with an Intellectual Disability. Students do not live at the location, and adults who receive residential services live in community homes, not the school. While the program is hosted in the same location as the day school, it does not function as an ICF/ID and therefore does not meet the criteria of presumed to have institutional qualities based on its physical setting.</p> <p>The service location is situated around residential neighborhoods and several shopping plazas including the Paoli Village Shoppes and the Paoli Shopping Center, both of which have several restaurants and stores for things like hardware, sporting goods, and stationary. Most of these places are a short walk away.</p>
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Service Location Name:	The Devereux Foundation (Devereux Whitlock Center Vocational Services)
Service Location Address:	119 Old Lancaster Road, Devon, PA 19333
Region:	Southeast
Onsite Visit Date:	3/16/22
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 type="checkbox"/> In a building that is also a public or privately operated facility that provides inpatient Institutional treatment (Hospital/SNF) <input checked="" type="checkbox"/> None of the above
ODP's Heightened Scrutiny Determination: Does the Service Location Overcome the Presumption of Institutional Qualities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Service Location Summary:	<p>The Devereux Foundation’s “The Shops at Devereux” seeks to encourage, assist and support individuals to achieve their highest level of vocational functioning. Services are provided in such a way as to enable individuals to learn marketable skills, increase social skills, and enhance self-esteem. The program is designed to enhance each individual’s development and potential for independence in the community.</p> <p>An onsite held for this program indicated that the service location does not reside on the Devereux Foundation campus in Devon. It is located in the community, surrounded by residential and commercial property. The design of the program encourages and incorporates interaction with community members. While it is in a building with several different “shops”, the program does not meet the criteria of presumed to have institutional qualities based on its physical setting.</p> <p>The service location is comprised of several community-facing shops and businesses that offer a variety of services such as auto and bike shops, a floral shop, and an apparel shop. It is located near a bird sanctuary as well as a few religious buildings and is only a short drive or walk from the main roads and route 30 where there are many commercial locations. Devon is a populated area northwest of Philadelphia and as a result there are many possibilities for engagement in the immediate community.</p>
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Residential Service Locations	
Service Location Name:	The Devereux Foundation
Service Location County:	Wayne
Region:	Northeast
Onsite Visit Date:	10/19/21

The Residential 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 type="checkbox"/> In a building that is also a public or privately operated facility that provides inpatient Institutional treatment (Hospital/SNF) <input checked="" type="checkbox"/> None of the above
ODP's Heightened Scrutiny Determination: Does the Service Location Overcome the Presumption of Institutional Qualities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Service Location Summary:	<p>This residential service location operated by the Devereux Foundation supports 4 individuals. It was originally self-identified as meeting the criteria of presumed to have institutional qualities based on its physical location.</p> <p>An on-site visit was held at this service location, which ODP determined does not meet the criteria of presumed to have institutional qualities based on its physical location. The home is in a rural area with some residential areas in the immediate vicinity, and a small town is a short drive away. There are community activities and outdoor opportunities for all individuals to engage in, although some require additional planning and coordination to ensure a safe and engaging activity and trip. Individuals are provided with options for outings.</p> <p>During the federal public health emergency, this service location was unable to participate in frequent activities in the community due to the health and safety needs of the individuals. As precautions have lessened, the program has maintained a slow, gradual approach to re-engaging in the community.</p> <p>The individuals who reside at this service location are supported to initiate and maintain contact with friends and family, and the provider coordinates visits with friends and family to ensure health and safety of the individuals. Individuals can choose what they do with their day and are fully supported to decorate their rooms and common areas of the house.</p>

	Through reviews of documentation submitted by the provider and the findings of the on-site visit, ODP determined that the service location does not meet the criteria of presumed to have institutional qualities based on its physical location, nor does it isolate the individuals who reside there from the greater community.
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Service Location Name:	KenCrest Services
Service Location County:	Lancaster
Region:	Central
Onsite Visit Date:	10/30/20
The Residential 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 type="checkbox"/> In a building that is also a public or privately operated facility that provides inpatient Institutional treatment (Hospital/SNF) <input checked="" type="checkbox"/> None of the above
ODP's Heightened Scrutiny Determination: Does the Service Location Overcome the Presumption of Institutional Qualities:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Service Location Summary:	<p>This residential service location operated by KenCrest Services provides services to 1 individual. It was originally self-identified as meeting the criteria of presumed to have institutional qualities based on its physical location.</p> <p>ODP performed an on-site visit to this service location where it was determined that it does not meet any criteria of presumed to have institutional qualities based on its physical location. The service location is in a rural area, but the review for this home revealed that the individual has opportunities to engage in the community and spend time with friends and family. The individual is also afforded their rights to make decisions and plan activities, including refusing to participate in services. The individual is involved in the</p>

decorating of their personal space and other spaces around the home. The preferences of the individual are valued in areas of medical care, and the provider takes all necessary steps to ensure the individual has the care and comfort desired.

As a result of the onsite review, and after further review of submitted documentation by the provider, it is evident that the service location does not meet the criteria of presumed to have institutional qualities, and that it does not isolate the individual who resides there from the greater community.