

# 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(s)</b>	585 Beechwood Circle, Langhorne, PA 19047-1600 586 Beechwood Circle, Langhorne, PA 19047-1600 587 Beechwood Circle, Langhorne, PA 19047-1600 588 Beechwood Circle, Langhorne, PA 19047-1600 589 Beechwood Circle, Langhorne, PA 19047-1600 92 Oakwood Dr, Langhorne, PA 19047-1600 94 Oakwood Dr, Langhorne, PA 19047-1600
<b>Setting Type:</b>	Residential Habilitation (Res Hab)
<b>Brief description of setting:</b>	Clubhouse-like setting with 8 bedrooms, kitchen, dining, lounge with television, van for each location. There is a total of seven site locations.
<b>Review Date:</b>	6/22/2022
<b>Number of Participants Served at Site</b>	56

<b>Reason for Category</b>	Characteristics to isolate participants from the greater community. Campus like setting location.
<b>Overcomes the presumption of institutional qualities?</b>	Yes
<b>Evidence to support</b>	<p>Setting provides transportation for participants who require 24-hour care and therefore are not able to leave the setting on their own.</p> <p>Participant Rights are posted in all Residential Habilitation residences in a common area of setting.</p> <p>Information about filing a complaint which includes an anonymous complaint is also posted in a common area of the setting.</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>Waiver participants know about and are encouraged to participate in community events. Participants can come and go any time they choose. Residential setting provides transportation to participants.</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	Provider has accessible vans to transport participants to various

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	social/recreational activities in the community.	locations for activities. All sites have activities and community events posted on the bulletin boards.
3. control personal resources,	Waiver participants should have their own checking or savings accounts and have access to their funds. Participants should not assign control of income and/or resources to the provider.	Provider's Participants' Rights policy states that the clients have the right to manage their personal financial affairs with assistance if requested or necessary. Participants have their own savings accounts.
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 home and community-based services.
(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.	Participants should choose the residential setting.	Screening and Intake policy provides participants with options for available living units. They will have a choice for homes in which they are recommended after evaluation.
and setting options are based on the individual's needs, preferences	Participants should choose the residential setting.	Screening and Intake policy provides participants with options for available living units. They will have a choice for homes in which they are recommended after evaluation.
and, for residential settings, [based on the individual's] resources	Participants should choose the residential setting based on resources	Screening and Intake policy provides participants with options for available living units. They will have a choice for homes in which

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available for room and board.	available for room and board.	they are recommended after evaluation.
(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.	Provider's Residence Rights policy stated that it ensures an individual's rights to privacy. This was observed during on-site visits that information on participant rights is posted in a common area of the setting. There were no schedules of medications, diet restrictions, etc. posted in a general open area for all to view.
(iii) Ensures an individual's rights of 2. dignity and respect,	Staff should address participants in the manner the person would like to be 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.	Provider's Residence Rights policy stated that a resident shall be treated with dignity and respect. Provider stated staff converse with waiver participants in the setting while aiding and during the regular course of daily activities.
(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.	Provider's Residence Rights policy stated that a resident shall be free from coercion. Also, observed information about filing a complaint posted in an obvious location and in an understandable format during site visit.
(iii) Ensures an individual's rights of 4. and freedom from restraint.	Participants should be free from coercion and/or restraint.	Provider's Residence Rights policy stated that a resident shall be free from restraints.
(iv) The setting optimizes, but does not regiment, individual initiative, autonomy, and independence in making	Participant should be able to choose the residential setting. The setting should provide opportunities for individualized outings.	Provider stated that each participant is offered a schedule of programming. The participant can request changes to that schedule to meet their needs and

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life choices, including but not limited to, ~daily activities		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 participants referred and accepted to residential rehabilitation program are based on the choice of the participant and availability in residential homes for which they are recommended. Also, the admission requirements would need to be met through evaluation and final funding approval.
(iv) Optimizes, but does not regiment, individual initiative, autonomy, and independence in making life choices, including but not limited to, ~and with whom to interact	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.
(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 programming. The participant can request changes to that schedule to meet their needs and preferences by talking to their service coordinator.