

The Office of Developmental Programs (ODP)
Heightened Scrutiny Evidentiary Information for Community
Participation Support Service Locations

(LifePath Inc)

The following table includes:

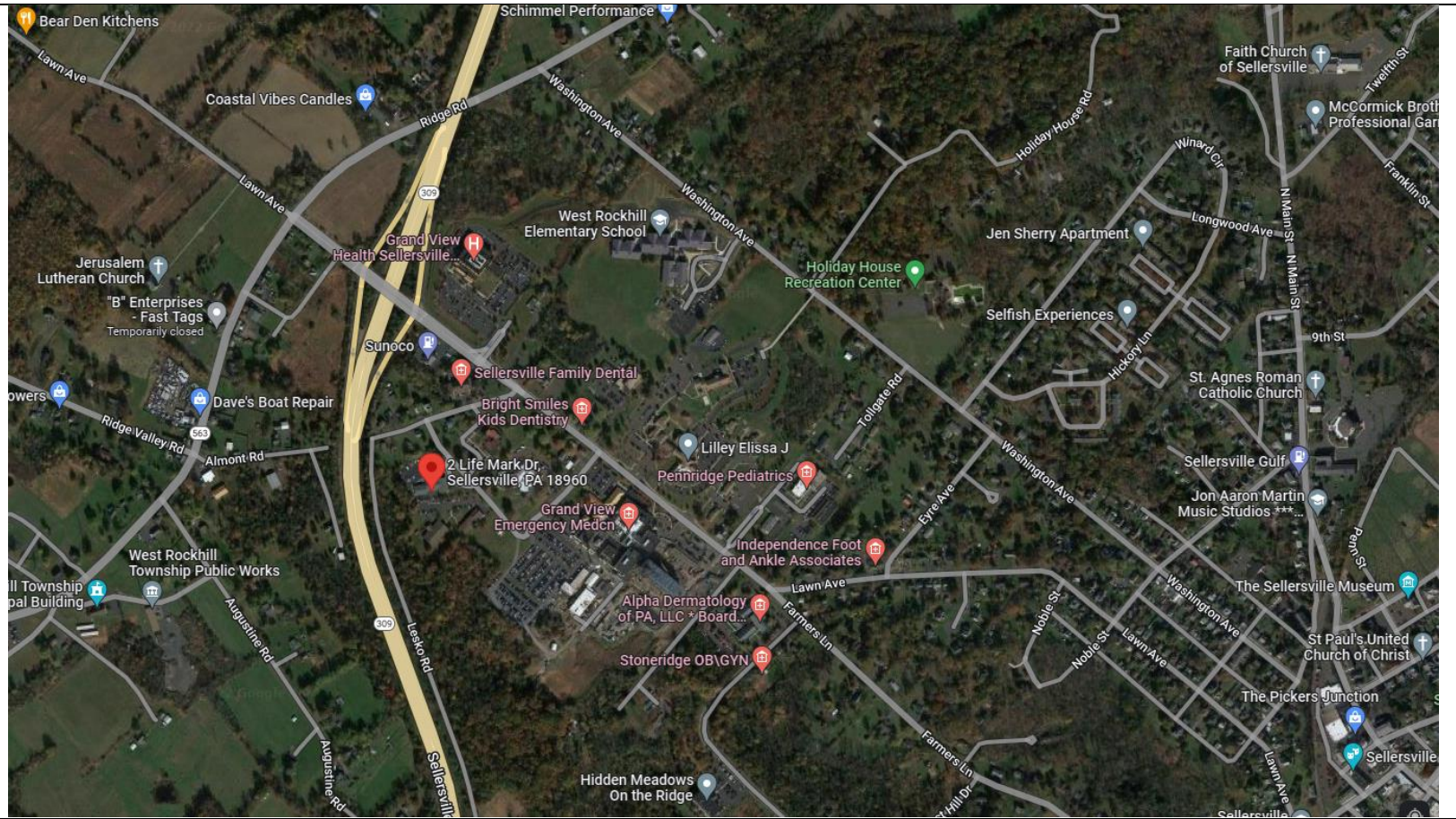
- where the CPS program is located (locations that have the presumption of institutional qualities and therefore, the possibility of isolating individuals from the broader community due to the service location’s physical location),
- ODP’s Heightened Scrutiny determination on whether the service location 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:	LifePath Inc
Service Location Address:	2 LifeMark Drive, Sellersville, PA 18017
Number of Individuals Receiving Services as of 6/30/21:	1
Onsite Visit Date:	3/17/22
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 checked="" 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)
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>LifePath assists individuals with ID/A to engage in their local community. LifePath believes that community engagement can lead to individuals building relationships, such as natural supports, which can increase the individual's self-esteem and independence. To learn more, please visit the program's website: https://lifepath.org/community-supports/</p> <p>This service location had an onsite visit that confirmed the service location is next to a public institution that is a licensed Intermediate Care Facility for individuals with Intellectual Disabilities. However, the service location does not isolate the individuals who attend the CPS program from the broader community. LifePath's CPS program is located in an area that community members would participate in through shopping, religion, medical services, and going to restaurants. Some of these places include: Dave's Boat Repair, Bright Smile Kids Dentistry, US Digestive Health, Fasageo's Italian Restaurant, etc..</p> <p>Photo of the public institution across from LifePath</p>





Aerial View of the Service Location:



View of Ridgecrest Pediatric Services Intermediate Care Facility (ICF) in close proximity to LifePath:

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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</i> 	<ul style="list-style-type: none"> ISPs, Progress Notes, Staff Training Records, Schedule of Activities, Behavioral/SEEN Plans, Individual Interviews, & Staff Interviews <ul style="list-style-type: none"> Individuals were given choices to participate in activities in the community.

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CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
	<p><i>about employment options appropriate for the individual.</i></p> <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> 	<ul style="list-style-type: none"> ▪ Bear Den Kitchens, parks, shopping, baseball games, music festivals, museums, bowling, movies, library, zoo, etc. ○ Activity calendar (see image below). ○ Staff use individuals' goals in their ISP to help with offering activities. ○ Prior to COVID, had a Laundry Program (prevocational) – assisted with life skills and job skills. ○ Individuals are free to move around the service location and receive support as needed if they wish to be outside. <p>Calendar of Activities for March 2022</p>

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CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
<p>The setting ensures an individual's right of privacy.</p>	<ul style="list-style-type: none"> 6100.182(h) <i>An individual has the right to privacy of person and possessions.</i> 6100.182(i) <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 Interviews, & Staff Interviews <ul style="list-style-type: none"> Staff followed ISPs when the individual wants to use a private space for personal care. <ul style="list-style-type: none"> Private bathrooms observed. For those who are not able to use the bathroom because of mobility reasons, the CPS program puts curtains up for privacy. The CPS program will also use mats for privacy, if needed. Designated spaces for individual's personal items at the service location. Personal space available for individuals to use the phone.
<p>The setting ensures an individual's dignity and respect.</p>	<ul style="list-style-type: none"> 6100.50 <i>Written, oral, and other forms of communication with the individual, and persons designated by the individual, shall occur in a language, and means of</i> 	<ul style="list-style-type: none"> ISPs, Staff Training Records, Progress Notes, Observations, Individual Interviews, & Staff Interviews <ul style="list-style-type: none"> Activities adapted to each individual.

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CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
	<p><i>communication understood by the individual or a person designated by the individual.</i></p> <ul style="list-style-type: none"> • <i>6100.182(d) An individual shall be treated with dignity and respect.</i> • <i>6100.182(m) An individual has the right to assistive devices and services to enable communication at all times.</i> 	<ul style="list-style-type: none"> ○ 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"> • <i>6100.350(a) 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, Individual Interviews, & Staff Interviews ○ Staff will help the individual manage their money if needed.
The setting ensures an individual's freedom from coercion and restraint.	<ul style="list-style-type: none"> • <i>6100.51(c) 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> • <i>6100.181(c) An individual may not be reprimanded, punished, or retaliated against for exercising the individual's rights.</i> • <i>6100.182(l) An individual has the right to voice concerns about the services the individual receives.</i> • <i>6100.343 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 Interviews, & Staff Interviews ○ No restrictive procedures noted or observed. ○ Complaint process followed per 6100.51. ○ Restrictive procedures were checked as part of the desk review of Individual Support Plans, service notes, progress notes, and provider policies. ○ All service locations are subject to a licensing inspection at least annually that ensure restrictive procedure requirements in 55 Pa. Code Chapters 2380 or 2390 are followed.