

The Office of Developmental Programs (ODP)  
Heightened Scrutiny Evidentiary Information for Community  
Participation Support Service Locations  
(Overbrook Friedlander-Focus Day Program)

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.

<b>Service Location Name:</b>	Overbrook Friedlander-Focus Day Program
<b>Service Location Address:</b>	1860 Wynnewood Road, Philadelphia, PA 19151
<b>Number of Individuals Receiving Services as of 6/30/21:</b>	8
<b>Onsite Visit Date:</b>	3/2/22
<b>Licensing Visit Date:</b>	6/7/22
<b>The CPS program is located:</b>	<input checked="" 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)
<b>ODP’s Heightened Scrutiny Determination: Does the Service Location Overcome the Presumption of Institutional Qualities:</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

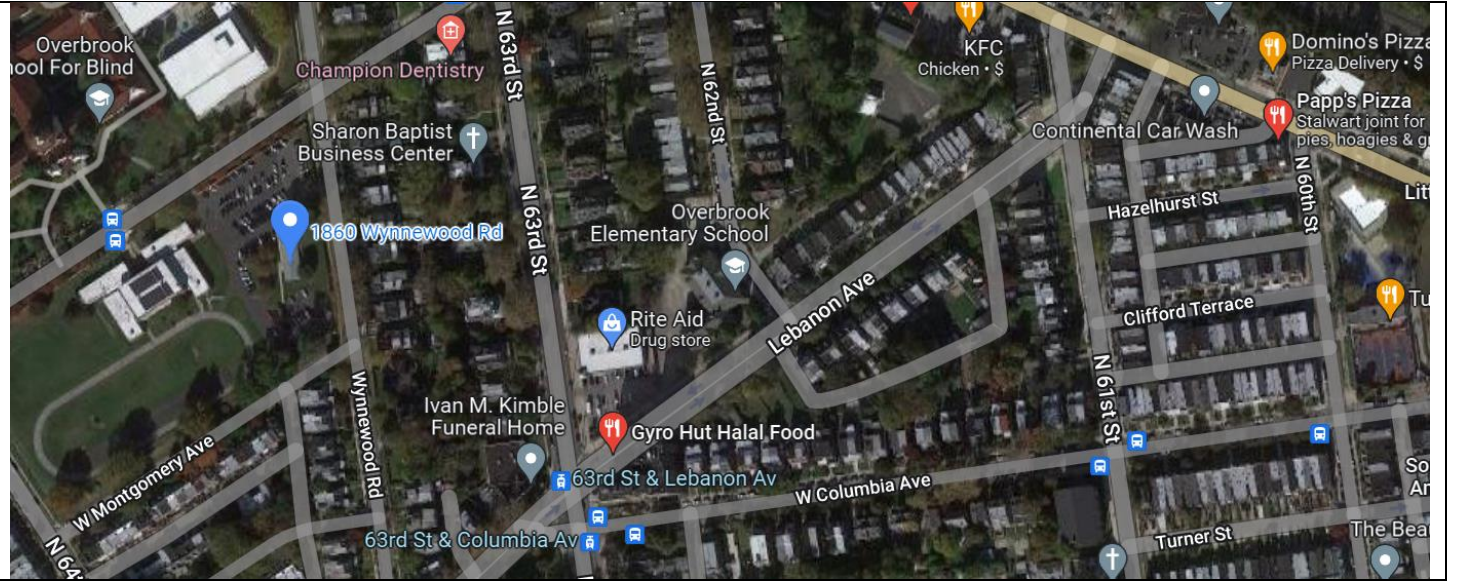
**Service Location Summary:**

Overbrook Friedlander provides individuals with ID/A assistance with skills that each individual can use to reach their personal goals and objectives. The program is built on each individual's interests, personality, and hobbies. Some individuals may also work on employment skills at this program. To learn more, please visit the program's website: <https://www.overbrookfriedlanderprograms.org/what-we-do>

This service location had an onsite visit that confirmed the service location is on the same property as an ICF. However, the service location does not isolate the individuals who attend the CPS program from the broader community. Near Overbrook Friedlander are places that people can eat and shop as well other community places such as car washes, funeral homes, schools, churches, etc. Some of the other places include: Gyro Hut Halal Food, KFC, Papp's Pizza, Rite Aid, etc.



**Aerial View of the Service Location:**




<b>Overbrook Friedlander-Focus Day Program</b>		
<b>CMS HCBS Standard / Expectation:</b>	<b>ODP HCBS Standard / Expectation:</b>	<b>How ODP Determined Compliance:</b>
<p><b>The setting supports opportunities to engage in community life, including seeking employment and working in competitive integrated settings.</b></p>	<ul style="list-style-type: none"> <li>• 6100.261 <i>The provider shall provide the individual with the assistance necessary to access the community in accordance with the individual plan.</i></li> <li>• 6100.262(a) <i>The provider shall provide active and ongoing opportunities and information about employment options appropriate for the individual.</i></li> <li>• 6100.443 <i>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></li> <li>• 6100.182(k) <i>An individual has the right to choose where, when, and how to receive needed services.</i></li> <li>• 6100.181(b) <i>The provider shall educate, assist, and provide the accommodation necessary for the individual to make choices and understand the individual's rights.</i></li> <li>• 6100.182(e) <i>An individual has the right to make choices and accept risks.</i></li> <li>• 6100.182(f) <i>An individual has the right to refuse to participate in activities and services.</i></li> <li>• 6100.182(g) <i>An individual has the right to control the individual's own schedule and activities.</i></li> </ul>	<ul style="list-style-type: none"> <li>• ISPs, Observations, Individual Interviews, &amp; Staff Interviews, Corrective Action Plan<sup>1</sup> <ul style="list-style-type: none"> <li>○ Opportunities offered in the community <ul style="list-style-type: none"> <li>▪ MANNA, Valley Forge Park, Amish Market, Lancaster County day trips, Shady Maple, volunteer by delivering meals, shipping, groceries, laundry mat, etc.</li> <li>▪ Individuals have freedom to move about the service location as they wish.</li> </ul> </li> </ul> </li> </ul>
<p><b>The setting ensures an individual's right of privacy.</b></p>	<ul style="list-style-type: none"> <li>• 6100.182(h) <i>An individual has the right to privacy of person and possessions.</i></li> <li>• 6100.182(i) <i>An individual has the right of access to and security of the individual's possessions.</i></li> </ul>	<ul style="list-style-type: none"> <li>• ISP, Observation, Individual Interviews, &amp; Staff Interviews <ul style="list-style-type: none"> <li>○ Staff follow ISPs when the individual wants to use a private space for personal care.</li> </ul> </li> </ul>

<sup>1</sup> The CAP submitted by this provider is still under review and has not yet been approved by ODP.

**Overbrook Friedlander-Focus Day Program**

<b>CMS HCBS Standard / Expectation:</b>	<b>ODP HCBS Standard / Expectation:</b>	<b>How ODP Determined Compliance:</b>
		<ul style="list-style-type: none"><li>▪ Observation of bathrooms, screened section in the activity room, etc.</li><li>○ Designated spaces for individual's personal items at the service location (see image below).</li><li>○ Observation of personal space available for individuals to use the phone.</li></ul>


**Overbrook Friedlander-Focus Day Program**

CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
		
<p><b>The setting ensures an individual's dignity and respect.</b></p>	<ul style="list-style-type: none"> <li>• <i>6100.50 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></li> </ul>	<ul style="list-style-type: none"> <li>• ISPs, Individual Interviews, &amp; Staff Interviews                             <ul style="list-style-type: none"> <li>○ Activities adapted to each individual.</li> <li>○ Staff work with individuals to build their own personal schedule.</li> </ul> </li> </ul>

<b>Overbrook Friedlander-Focus Day Program</b>		
<b>CMS HCBS Standard / Expectation:</b>	<b>ODP HCBS Standard / Expectation:</b>	<b>How ODP Determined Compliance:</b>
	<p><i>communication understood by the individual or a person designated by the individual.</i></p> <ul style="list-style-type: none"> <li>• <i>6100.182(d) An individual shall be treated with dignity and respect.</i></li> <li>• <i>6100.182(m) An individual has the right to assistive devices and services to enable communication at all times.</i></li> </ul>	<ul style="list-style-type: none"> <li>○ Individuals have the right to choose when they took their breaks and where they took them.</li> <li>○ Staff communicate in a method of preferred communication stated and known by the individuals. <ul style="list-style-type: none"> <li>▪ Each staff trained on each individual's communication plan, if applicable.</li> <li>▪ Staff will use ASL to communicate, as applicable (see image below).</li> </ul> </li> </ul>



**Overbrook Friedlander-Focus Day Program**

CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
		
<p><b>The setting supports opportunities to control personal resources.</b></p>	<ul style="list-style-type: none"> <li>• 6100.350(a) Access to or the use of an individual's personal funds or property may not be used as a reward or punishment.</li> </ul>	<ul style="list-style-type: none"> <li>• ISPs, Individual Interviews, &amp; Staff Interviews             <ul style="list-style-type: none"> <li>○ Staff will help the individual manage their money if needed.</li> </ul> </li> </ul>

Overbrook Friedlander-Focus Day Program		
CMS HCBS Standard / Expectation:	ODP HCBS Standard / Expectation:	How ODP Determined Compliance:
		<ul style="list-style-type: none"> <li>▪ Staff assist individuals with teaching them how to pay for their items on their own.</li> </ul>
<p><b>The setting ensures an individual's freedom from coercion and restraint.</b></p>	<ul style="list-style-type: none"> <li>• <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></li> <li>• <i>6100.181(c) An individual may not be reprimanded, punished, or retaliated against for exercising the individual's rights.</i></li> <li>• <i>6100.182(l) An individual has the right to voice concerns about the services the individual receives.</i></li> <li>• <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></li> </ul>	<ul style="list-style-type: none"> <li>• ISPs, Individual Interviews, &amp; Staff Interviews <ul style="list-style-type: none"> <li>○ Complaint process followed as per 6100.51.</li> <li>○ Restrictive procedures noted or observed.</li> <li>○ Restrictive procedures were checked as part of the desk review of Individual Support Plans, service notes, progress notes, and provider policies.</li> <li>○ 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.</li> </ul> </li> </ul>