

PHMC OST Intermediary

Guidance for Inclusive Programming and Needs Accommodation

(Rev as of 3/2025)

Overview

The City of Philadelphia OST funding is intended to prioritize services:

- To children and youth who have open cases with Philadelphia's child welfare system.
- To youth most impacted by poverty, truancy, poor academic performance, and those who identify as having limited English language proficiency or face other adversities that might challenge their long-term school and life success.

As such, OST programs must:

- Provide reasonable accommodations to make OST programming accessible to children and families that face language access issues or youth with Individualized Educational Plans (IEP) and/or who have disabilities.
- Create a positive, welcoming environment for all children and youth.
- Support in the identification of children and youth that can benefit from interventions to assist in their mental, emotional and physical development.
- Support in the delivery of identified intervention services for the benefit of a child's mental, emotional and physical development.

(For further information, please refer to the SOP for your OST program; excerpts from the SOP are also included in the References section of this document).

PHMC's intermediary services to the OST Network are available to support providers in this area of our work. In particular, PHMC provides the following:

- Professional development in social and emotional learning such as behavior supports and accommodations.
- Coaching and communities of practice to share best practices in inclusive programming, addressing challenging behaviors and providing reasonable accommodations.
- Resource materials on providing inclusive practices and mitigating challenging behaviors (all of which are available on PHMC's website <https://philaocfost.phmc.org/>).
- Needs Accommodation Worksheet to request additional support for youth-specific planning.
- Technical Assistance through Variety, The Children's Charity of the Delaware Valley.
- Support Services Coordination Pilot Project (at participating provider organizations).

This document provides guidance that OST providers must follow for accessing support for and providing support to children with disabilities, challenging behaviors, or other concerns that impact the child's engagement with the OST program.

Consent to Share Information

Please note that the OCF Consent form that is completed at time of enrollment includes consents for the OST provider to share information on youth as part of the OST program and for the School District to share information, such as IEPs and other educational records with the OST provider. OST provider agencies should review consent forms both generally and in reference to specific youth to ensure that the parent has given the appropriate consent. Parents should continue to serve as the primary source of information about their children.

Children and Youth with Individualized Education Plans and/or other Required Accommodations

During the recruitment and enrollment process, OST providers may learn that a youth will need accommodations for their participation in the OST program. This may occur when an OST provider identifies that a youth has any of the following:

- Individualized Education Plan (IEP).
- 504 Service Agreement (also known as 504 plan).
- Barrier to communication.
- A mental or physical disability or impairment.

During the enrollment process, OST providers are advised to request and review any available documents, such as a student's IEP or 504 Plan that may provide information on necessary accommodation(s) that are applicable to the OST program setting. Providers are also advised to discuss with the parent/caregiver what accommodations may be needed and how those accommodations have been successfully implemented in the past in other settings and enrichment programs. **The purpose of this activity is to identify successful strategies that can be implemented as the child enters the program to ensure that the child is fully included in the OST program.**

Providers must make every effort to provide reasonable accommodations – which may include but not be limited to:

- Physical accommodations such as changes to the classroom layout to ensure handicapped accessibility.
- Understanding and using assistive technology.
- Implementing actions and/or services identified in the IEP or other support plan that support engagement and participation in the OST program.

Providers are required to comply with all city, state, and federal regulations and rules concerning accommodations, IEPs and 504s. Providers may draw on any of their own agency resources (personnel, related agency programs, budgetary support) and must ensure that all of their agency policies and procedures for accommodation activity are followed. If the provider is part of the Support Service Coordination pilot, they can access the Support Service Coordinator (SSC) within their agency.

PHMC recommends that providers access additional information and support from PHMC on how to implement specific child accommodation(s) by completing the Child's Needs Accommodation Worksheet: <https://www.cognitofrms.com/phmc1/childsneedsandaccommodationsworksheet>.

Providers must ensure that these activities proceed at a reasonable pace. Providers who identify a barrier that will delay the youth's participation in the OST program must notify PHMC. (See section below: Changes to OST Program Participation and/or Enrollment).

There may be situations where the OST provider is not reasonably able to provide the necessary accommodations. If after consultation with PHMC and Variety it is determined that the OST provider is unable

to maintain the child safely in the OST program, the provider must submit a request to PHMC and OCF to dismiss the child and then receive approval before taking any action. Please refer to the section below regarding changes to OST program enrollment.

Children and Youth Who Exhibit Challenging Behaviors In the OST Program

It is not uncommon for OST Providers to experience challenging behaviors from children and youth that attend their program. OST Providers were selected through the competitive RFP in part because they have the skills and resources to address those behaviors and ensure that youth feel supported and are able to adjust. However, OCF and PHMC recognize that there are times when behavior is particularly concerning, impacts the safety of other children, and/or staff, or is so frequent that it disrupts the OST program's activities.

OCF and PHMC are committed to ensuring that providers create positive and inclusive spaces for all children and youth. The SOP outlines expectations for inclusive programming and positive behavior support and de-escalation. OST program coaches can provide coaching, support and information to providers as they implement these programmatic approaches.

Each OST provider's policies and procedure related to behavior and program pauses, suspensions, removals, dismissals and/or expulsions must align with the SOP and with this guidance. **Children will not be permanently dismissed from programming by OST providers without communication and mutual agreement with OCF.** OST providers should work to provide accommodations to any child that exhibits concerning or challenging behaviors.

OST provider staff are expected to follow the below steps when addressing consistent disruptive behavior that impacts a child's participation in OST programming:

1. Address the behavior when it occurs and document it:
 - As noted, OST coaches are available to assist providers in developing general programmatic approaches for positive behavior support and de-escalation.
 - If behavior results in a serious incident, providers should report those incidents to PHMC (refer to the SOP section on Incident Response and Reporting Procedures).
2. If behavior persists or is disruptive to the program, undertake all of the following activities:
 - Consult with child's parents/guardians to identify ways to mitigate and address the behavior.
 - Connect with staff at the child's school (see section above regarding OCF Consent Form). This may include reaching out to a school counselor, special education staff, behavioral health staff and others to identify resources, successful interventions or accommodations.
 - Request from the child's school copies of IEPs, 504 plans, any other behavior or accommodation plans (see section above regarding OCF Consent Form).
 - If the site is part of the OCF-funded Support Services Coordination pilot, engage their agency's Support Service Coordinator (SSC).
3. Develop a plan to mitigate and address the challenging behavior in the OST program. OST provider can at any time submit a Needs Accommodation Worksheet to request support from PHMC and Variety. The form link is:
<https://www.cognitofrms.com/phmc1/childsneedsandaccommodationsworksheet> (Refer to the section on the Needs Accommodation Worksheet for more information on that process.)
4. Implement the accommodation plan at the child's OST site.
5. Continue to explore additional supports through discussions with parents, school, PHMC and other relevant external providers.
6. Continue to document any ongoing behavior concerns.

7. Engage with the OST Program Coach and Coach Manager who may also coordinate with the OST Technical Assistance Manager. The Technical Assistance Manager will assist providers that do not have a Support Service Coordinator to explore other avenues of support through the Philadelphia School District, training resources, and city mental and behavioral health resources.

If, after completing all steps listed above, the child's behavior continues to significantly disrupt OST programming to the detriment of other youth or creates a serious safety concern, the OST provider may request the following from OCF/PHMC:

- Pause the student attendance at the program until appropriate supports can be put in place; or
- Dismiss the youth permanently from OST.

Needs Accommodation Planning Process with Variety and PHMC

OCF and PHMC have engaged the services of Variety to provide the technical and content specific knowledge to develop Needs Accommodation Plans.

Through the Needs Accommodation Worksheet process, OST providers engage with Variety. Variety can support providers to use the information from parents, school staff, and from the child's IEP or other support plans to develop an accommodations plan that can be implemented in the OST program.

What the Needs Accommodation Plan Is and Is not

Submission of a Needs Accommodation Worksheet is not a last resort, nor is it the first step in this process. The Needs Accommodation Process works best when the OST Provider has already begun to gather information and connect with the parent(s)/caregiver(s), the school, and with any other stakeholders.

As noted above, if the OST provider identifies during the enrollment process that a child has an IEP, the Needs Accommodation process may be started promptly as the child is entering the program.

In all cases, OST providers are expected to have agency resources, knowledge, skills and information that can support children with disabilities, special needs, and/or behavior challenges. These expectations were included in the RFP process through which the current cohort of OST providers were awarded funding. The Needs Accommodation process is therefore a partnership in which Variety provides expertise, the OST provider fully engages and PHMC staff are available to support.

Accommodations worksheet process is intended to:

1. Develop a plan that will provide the least restrictive behavior intervention strategies to provide universal support to a youth exhibiting challenging behaviors in the OST Program. Staff will be taught strategies to teach expectations of the OST program while encouraging and reinforcing positive behavior.
2. Be supplemental and specific to the individual and the program.
3. Provide a blueprint to manage youth behavior within OST programming. The accommodations that are recommended are not only helpful to staff but the youth and families as well. These accommodations are tools that can be utilized with an individual youth exhibiting behavior or all youth throughout the program to encourage positive interactions.

Accommodations worksheet process is NOT:

1. The final step to support a youth, as additional support outside of the purview of Variety may be required.
2. A diagnosis of a youth behavior, mental, or physical condition.

3. Based off of a formal functional behavioral analysis or observation; the information included in the worksheet is recognized as OST provider staff observations and anecdotal information.
4. Is not a waiver for the student from program behavior codes of conduct/norms. Accommodations are meant to help integrate youth into program and activities. The goal is not to accommodate the behavior, but to accommodate the needs of the youth to mitigate or prevent the challenging behavior.

The process of implementing the accommodations plan is understood to be a gradual process. Some youth will need extra support or work outside of the group or program as the plan is implemented. Youth should be encouraged to use their voice and practice making good choices. Staff should be receptive to youth that may decide not to participate in activities but are not displaying maladaptive behaviors. The needs accommodation plan may be revisited and revised as needed throughout the OST program term.

Needs Accommodation Process

The section below outlines the process of starting and developing a Needs Accommodation Plan

1. OST Provider completes a Needs Accommodation Worksheet in Cognito:
<https://www.cognitoforms.com/phmc1/childsneedsandaccommodationsworksheet>
2. Upon submission, Cognito auto generates emails to the OST provider (staff member that completed the form), the OST Coach, Variety's designated staff member and PHMC's Technical Assistance Manager
3. Variety contacts the OST Staff member (contact designated in the form) within 2 business days to:
 - Schedule a meeting.
 - Request more information.
4. OST Provider and Variety meet
This meeting is most effective when it includes the OST site director, Variety staff, OST provider Agency's Support Service Coordinator (if funded), and relevant OST provider agency resources. PHMC's OST Coach, Coach Manager and/or Technical Assistance Manager may be present at the request of the provider agency or if PHMC has identified specific concerns.
5. Variety updates PHMC on the conversation; PHMC will provide suggestions or tasks as needed.
6. Variety provides the final draft of the plan.
7. OST provider reviews plan and implements it; PHMC (Coaches, Coacher Managers, or TA Manager) will support implement. The OST provider makes PHMC aware of any services/ supports that are not readily available (connection to mental or behavioral health supports, tutor, transportation, ADA requirements, etc.).
8. OST provider incorporates discussed plan and resources and monitors its impact throughout its implementation. It is advised that OST staff use case notes for youth and monthly SSC submissions (if funded), to track any progression or regression.
9. As needed, the OST provider may adjust the plan and may request additional meetings with Variety to support the process.

The goal is that the youth is able to participate fully and successfully in the OST program. However, OST providers must report to PHMC if there are any signs of regression, especially those that lead to serious incidents. PHMC will assist in developing next steps in those situations.

Note, in addition to the child-specific assistance with needs accommodation planning, OST providers can request technical assistance from Variety that can help OST programs develop approaches to mitigate and address similar behavioral concerns from multiple children within the program. OST providers may request this via their OST Program Coach.

Changes to OST Program Participation and/or Enrollment:

Dismissal, Suspension, Program Pauses and Other Changes.

OST providers must make accommodations that allow a young person to participate whenever possible. Not all accommodations will be free or easy, but they are still both legally required and important to our communities. Dismissing, suspending, or otherwise pausing a youth's program participation should only be a true last resort when other accommodations have failed.

Any change that an OST provider seeks to make to a youth's enrollment or participation as a result of behavior challenges, an Individualized Educational Plans (IEP), and/or a disability or suspected disability must be submitted to PHMC/OCF. OST programs cannot exclude children with disabilities unless their presence poses a direct threat to the health or safety to self or to others or necessary care would fundamentally alter the nature of the program. A decision must be based on an individualized determination.

PHMC/OCF understand that there may be instances when a youth's behavior creates a significant health or safety concern that requires immediate action – as such, pre-approval of some OST provider actions are not required. However, OST providers must be prepared to demonstrate that they followed their agency policies and OST program policies prior to making any change to a youth's enrollment or program participation.

If PHMC determines that policies and procedures were not followed and the change to enrollment status was not warranted, PHMC may implement coaching and/or corrective action with the provider.

PHMC identifies the following three options for OST providers:

Delay or pause to program enrollment/participation: When the accommodations needed for a youth are not available or when an OST provider needs time to put these supports in place; they may notify PHMC/OCF that program enrollment/participation will be delayed or paused.

- Example: the youth has a suspected disability that is resulting in challenging behaviors that create a safety risk for the youth and/or others in the program; the OST provider has successfully referred the youth to IBHS and the youth is scheduled for an evaluation. The OST provider may determine that they will pause programming for the specific youth while a formal assessment occurs and will resume programming once the assessment is complete and the accommodation plan is put in place.

Temporary suspension of program participation: OST providers are permitted to suspend youth participation for a temporary period for up to 3 days maximum.

- OST programming is an important service for youth and families and a suspension in program participation can have a significant negative impact. This may only be implemented if an immediate and significant safety concern has been identified and documented. Suspension should not occur unless the OST provider has already started all of the steps in #2 of the section above 'Children and Youth Who Exhibit Challenging Behaviors In the OST Program'.
- Program suspension cannot be used as a punitive tool for either youth or their families. If a parent or caregiver has been unresponsive to communications about behavior concerns, OST providers should engage their program coach to help identify alternative approaches.
- The program suspension period may be used by OST providers to complete investigations if warranted (i.e. when a youth has made or is suspected to have made a serious threat impacting OST program safety)

Dismissal or Expulsion from the OST program: Permanent dismissal or expulsion requires written **pre-approval** from PHMC/OCF.

- Once the request has been submitted to PHMC, PHMC/OCF will response within 2 business days of receipt of the request.
- OST providers must provide parents/caregivers with information on resources and supports for the youth; PHMC is available to assist in this area.
- OST providers cannot deny the family the opportunity to apply in the following school year for OST programming or to apply for OST programming for siblings or other youth from the same household.

Process to notify PHMC and OCF regarding changes to Enrollment/Participation

OST providers will submit the notification/request via Cognito:

<https://www.cognitoforms.com/PHMC1/OSTProgramParticipationAndorEnrollmentDismissalOrExpulsionRequestForm>

OST providers must be prepared to provide all of the following when submitting the request:

- Youth name and Cityspan ID#.
- Type of change requested (pause/delay, suspension, dismissal).
- The date that the change (start and proposed end date).
- A brief statement of the reason for the submission.
- If the youth has an IEP, 504 plan or other accommodation.
- If the OST provider has submitted a needs accommodation worksheet and status of any follow-up.
- Documentation of any incidents that preceded the request.
- Documentation of efforts to support the youth and mitigate behaviors.
- Documentation of efforts to connect with the youth's parents/caregivers.

PHMC will respond in writing within 2 business days notifying the OST provider of any of the following:

- If needed, a request for additional information.
- Scheduling of a meeting with the OST provider to review the notification/request.
- Acceptance or non-acceptance of a dismissal, expulsion or program pause.
- Approval or non-approval of a request for program dismissal.

OST Providers that identify a situation that requires a more immediate response (less than 2 business days) should complete the Cognito form and then notify their coach, coach manager (and TA Manager if engaged in the student's case) and copy the ost@phmc.org email address to request an escalated response.

If a dismissal or expulsion request is not accepted or not approved by PHMC/OCF, PHMC will schedule a meeting to debrief with the OST provider and identify next steps for the youth. PHMC may also identify actions such as coaching and/or corrective actions that the OST provider will be required to undertake.

Reference:

Other PHMC resources

All of the resource below are/will be available on [PHMC's OST website](#):

- Professional Development (<https://www.eventbrite.com/o/philadelphia-office-of-children-and-families-ost-17370663398>)
- Variety's Behavioral Health Resource Toolkit [2023 edition]
- BH/MH resources

Definitions

504 service agreements: also known as 504 plans. These agreements are formal documents that detail how each school gives youth with disabilities the support they need to be successful.

Individualized Education Plan (IEP): An IEP is a written plan for the provision of services for the education of students who are disabled or gifted.

DBHIDS: Department of Behavioral Health and Intellectual disAbility Services