



CENTERS FOR INDEPENDENT LIVING
COMPLIANCE REVIEW REPORT

Silicon Valley Center for Independent Living (SVILC)

Grant Award Numbers: H132A010042 (San Jose) and H132A970013
(Gilroy)

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REHABILITATION SERVICES ADMINISTRATION

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I. PURPOSE OF THE ON-SITE MONITORING REVIEW

Sections 706(c) and 722 of the *Rehabilitation Act of 1973, as amended* (Rehabilitation Act) mandate that the Rehabilitation Services Administration (RSA) conduct on-site reviews of centers for independent living (CILs) funded under Title VII, Part C, Section 722. The objectives of on-site reviews are to:

- assess compliance with the requirements of Section 725(b) and (c)(3) of the Rehabilitation Act and 34 CFR 366.60-366.63;
- study program operations, organizational structure and administration of the CIL under Section 725(c)(1), (2), (5) and (6) of the Rehabilitation Act and 34 CFR 366.2 and 366.50;
- review documentation sufficient to verify the accuracy of the information submitted in the most recent 704 Annual Performance Report;
- verify that the CIL is managed in accordance with federal requirements in the Education Department General Administrative Regulations (EDGAR);
- assess CIL conformance with its work plan, developed in accordance with Section 725(c)(4) of the Rehabilitation Act and 34 CFR 366.50(d)(2), conditions of the CIL's approved application, and consistency with the State Plan for Independent Living (SPIL);
- identify areas of suggested or necessary improvements in the CIL's programmatic and fiscal operation and provide technical assistance resources available on the local, state, regional and national level;
- identify areas of exemplary work, projects and coordination efforts and make this information available to the larger CIL community; and
- provide an opportunity to share information with experienced nonfederal individuals involved in the operations of CILs and make available technical assistance to enhance CIL operations or to minimize or to eliminate problem areas.

II. METHODOLOGY

The on-site review of the Silicon Valley Center for Independent Living (SVILC) was conducted during January 6-8, 2014. The review covered both Part C grants. The program review covered the independent living (IL) operations and activities and the financial review examined its participation in Title VII, Part C, of the Rehabilitation Act. RSA used the On-Site Review Guide (ORG) to conduct the on-site review. During the review, interviews were conducted with the center's management, staff, consumers, and members of the board of directors. In addition to the interviews, program and financial documents were reviewed in accordance with the protocol required by RSA's ORG, including written policies and procedures, a sample of consumer service records (CSRs), and other documents that verified compliance with standards and indicators. CSRs were selected for review on a random basis. RSA conducted an exit conference at the conclusion of the review to provide feedback on initial impressions from the review.

The RSA review team included the following individuals:

- Elizabeth Akinola, RSA program specialist;
- Rebecca Coffin, non-federal reviewer; and

- Paul DeMange, designated state unit (California Department of Rehabilitation).

III. MISSION AND DESCRIPTION

SVILC is a disability justice and resource organization that promotes independence, equality and choice for people with all disabilities of all ages and cultures to live in the community of their choice. SVILC serves Santa Clara County, California and was awarded its first grant under Title VII of the Rehabilitation Act in 1976.

In addition to the four core services, SVILC provides the programs described below.

- **Assistive Technology, Adaptive Equipment, and Home Modifications Program:** This program, started in 2000, uses AB204 (state) funds provided by the California Department of Rehabilitation to educate both consumers and community members through product demonstrations and workshops. The focus is on the various assistive technology (AT) and adaptive devices available to people with disabilities that assist them in performing tasks related to activities of daily living, employment, education and self-care. SVILC introduces consumers to mobility devices, augmented communication devices, and visual aids that can help them achieve their independent living goals. SVILC also participates in the statewide AT Network Device Lending Library program, enabling consumers and community members to try out aids and devices before purchasing them. Additionally, staff provides training on using accessibility software and works with consumers to identify potential funding sources for purchasing adaptive devices, as well as vehicle and home modification materials. In FY 2013, \$109,774 was expended on this program from which over 100 consumers benefitted.
- **Community Transitions Project:** This project started in 2010 as part of the California Money Follows the Person Rebalancing Demonstration program. Through this project, SVILC provides transition coordination, which includes comprehensive case management, both pre-transition and for one year post-transition, for eligible individuals with disabilities relocating from nursing homes or other long-term care facilities. In FY 2013, SVILC served 65 consumers through this project using \$305,372 in funds from the Center for Medicare and Medicaid Services.
- **Personal Care Attendant (PCA) Management:** This program is designed to educate consumers on the process of hiring, training, and managing PCAs. Consumers are assisted to use in-home support services and to facilitate PCA registration. In addition, SVILC maintains a list of PCAs who work on a fee-for-service basis for emergency or respite care. In FY 2013, SVILC received \$98,445 in funding from the Santa Clara County General/County and Municipal Community Development Block Grant program to provide services to 58 consumers through this program.

IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

- **Locating Affordable, Accessible Housing program:** For the past 30 years, SVILC has provided assistance to consumers in locating affordable accessible housing in Santa Clara County as part of its community integration goals. SVILC provides extensive resources to search and identify rental and other properties. It also conducts weekly workshops to

help consumers gain more insight into the local housing market and to provide basic information on tenant/landlord rights and responsibilities. Community members and other stakeholders are also educated about the shortage of accessible and affordable housing for people with disabilities and the impacts this has on access to employment, education and socialization opportunities. Annually, SVILC consumers who are homeless, in temporary housing, or in need of better housing benefit from this program funded with general and Municipal Community Development Block Grant funds provided by Santa Clara County. In FY 2013, 191 consumers were integrated into the communities of their choice through this program for approximately \$139,151. Affordable accessible housing enables consumers to establish foundations that support independent living outside of nursing homes and other institutions.

- **Olmstead Peer Mentoring – Stepping Stones:** This program was started in 2010 to assist consumers to build the confidence necessary to manage a new life in the community upon relocation from a nursing home or other institutional facility. The program uses the peer counseling and mentoring approach in which people who have successfully transitioned from nursing homes and institutions into the community share their knowledge and experience with those who wish to transition or have recently transitioned. The program promotes an interdependent lifestyle, affording participants a framework to avoid isolation through the creation of a social support network and better understanding of resources and options available to them. This program is provided through a community-based organization contract with Santa Clara County. In FY 2013, 49 consumers benefitted from this program at a total cost of \$85,583. Through this program, consumers not only learn vital skills essential for independent living in a community setting but also receive crucial feedback and encouragement from peer mentors with similar experiences.

V. OBSERVATIONS AND RECOMMENDATIONS

During its review activities, RSA identified the observations below and made recommendations that SVILC may consider.

1. CSR management

Observation: RSA randomly selected and reviewed 20 consumer service records (CSRs) at SVILC's two locations: 13 active and 7 inactive. All the CSRs reviewed contained complete and specific information about services requested, services provided, IL goals or objectives established, and IL goals and objectives achieved, independent living plans (ILPs) and waivers, and other CSR documentation required by 34 CFR 364.53. However, the CSR information and accompanying narratives were not always consistent in layout, format and quality. For example, there was no uniformity where documents were placed in files and not all records reviewed contained the same level of detailed information about the consumer's roles and responsibilities for achieving their IL goals.

The executive director and program director explained that SVILC realized this shortcoming in CSR documentation shortly before the onsite and has taken steps to address the matter. The review team provided technical assistance to SVILC staff regarding documentation and CSR management.

Recommendation: RSA recommends that SVILC complete its documentation and CSR management improvement process to ensure uniformity in where documents are placed in all CSRs; all forms used are in the same format; and all records contain consistent level of detailed information about the consumer's roles and responsibilities for achieving their IL goals.

Technical Assistance: The review team was informed that SVILC staff has previously taken the CSR rapid course at: <http://ilru.org/html/training/rapidCourses/index.html>. However, in light of this observation, SVILC should consider retaking this module as a refresher for existing staff in addition using it to orient and train new staff.

SVILC Response:

SVILC, under the supervision of new leadership, had conducted self-review and identified this issue prior to the RSA site visit. As a result, SVILC developed a template for hard copy CSR files based on the CSR requirements discussed and learned from online course offered by ILRU, peer reviews by two independent living centers, and review by ILRU Technical Assistance Coordinator. SVILC management has commenced providing ongoing periodic trainings to staff on CSR documentation to ensure quality content, consistency in layout and format. SVILC will continue to use the online tool provided by ILRU as recommended by the RSA review team to explore improvement in implementation of SVILC protocols for CSRs.

SVILC will take the following action steps to address this recommendation:

- 1) periodically review organization program policies and procedures;
- 2) new and existing program staff and program director to complete CSR online ILRU training;
- 3) review, discuss and follow-up on established CSR protocols and requirements;
- 4) designate a staff member to periodically review consumer files from both offices for quality assurance, consistency and address issues identified promptly.

Responsible staff: Annie Bursor-Ryan, ILS/AT Assistant, program lead staff and new Director of Programs, once hired.

Timeline for completion of all of the above:

The action steps listed above correspond to the timeline completion as follows:

- 1) monthly all staff meetings and ongoing;
- 2) as needed and ongoing;
- 3) twice a month at program staff meetings; and
- 4) currently in progress to be completed by 6/30/14; continue quarterly thereafter.

2. Training and development

Observation: RSA interviews with the SVILC staff indicated that the center is not providing sufficient training on how to provide IL services to unserved and underserved populations. Specifically, staff shared that they do not feel equipped to work with consumers in certain

disability categories including individuals with learning disabilities, memory loss, and Asperger's.

Recommendation: RSA recommends that SVILC consider revising training modules for current and new staff to include effective methods and approaches for providing services to unserved and underserved populations and specific disability categories. In addition, SVILC may encourage current and new staff to attend relevant workshops and to participate in training provided by the Independent Living Research Utilization (ILRU). SVILC could also invite consumers to staff training sessions to share their experiences about effective approaches that they have found helpful as recipients of IL services.

SVILC Response:

SVILC encourages staff to use ILRU training modules on an ongoing basis, and also offers different IL work-related trainings during monthly all staff meetings. SVILC will continue to educate staff on different training options and advantages of ongoing opportunities for specific trainings locally offered and online trainings offered by ILRU. SVILC has reviewed the policy and procedures to request job-related trainings with staff at the all staff meeting following the RSA site visit, beginning on February 6, 2014, and ongoing.

SVILC will take the following action steps to address this recommendation:

- 1) SVILC will schedule staff-requested specific Mental Health disabilities training. SVILC will also continue to encourage staff to use online training modules offered by ILRU.
- 2) SVILC will collaborate with organizations providing Vietnamese services in Santa Clara County to provide on the job training by shadowing the service provider to learn cultural competency and effective methods to reach out to Vietnamese community.
- 3) SVILC will conduct three community forums and/or participation in conference, fairs or workshops to reach out to unserved-underserved Vietnamese community in Santa Clara County. As recommended, SVILC will make conscious efforts to include consumers in above training sessions to understand the effectiveness of our services based on their needs and experiences.
- 4) SVILC will approve individual staff training requests as requested based on funding and staff time availability.

Responsible staff: Annie Bursor-Ryan, ILS/AT Assistant, program lead staff, and new Director of Programs, once hired.

Timeline for completion of all of the above:

The action steps listed above correspond to the timeline completion as follows:

- 1) offered once every quarter for the year 2014 and will offer such trainings as requested beginning year 2015;
- 2) once every quarter effective June 2014 depending on opportunities offered by the partner organizations until December 2015;
- 3) in progress, to be completed by 6/30/14; and

4) as requested.

VI. FINDINGS AND CORRECTIVE ACTIONS

During the on-site review, no compliance findings were identified.

VII. TECHNICAL ASSISTANCE

During its review, RSA provided technical assistance in the following areas:

- developing a three-year program and financial plan that meets all federal requirements (Note: on January 9, 2014, SVILC submitted a draft three-year program and financial plan to RSA that will be finalized upon board approval);
- using identification numbers and/or initials on the back of folders containing CSRs rather than the full names of consumers in order to further safeguard confidentiality;
- periodically evaluating the training and development needs of board members and including topics related to board roles and responsibilities in the orientation of new members;
- maintaining updated documentation of staff participation in the center's annual drug-free workplace awareness program; and
- improving internal controls by having the two designated check signers place their initials on invoices as documented proof that both designees did approve payment and appropriately signed the check.