



CENTERS FOR INDEPENDENT LIVING COMPLIANCE REVIEW REPORT

Access To Independence (A2I)

Grant Award Number: H132A970001 (San Diego)
H132A970017 (Escondido)
H132A980824 (Calexico)

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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 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 Access to Independence (A2I) in San Diego, California was conducted from May 7-11, 2012. The program review covered the independent living (IL) operations and activities of A2I, and the financial review examined the centers' participation in Title VII, Part C, of the Rehabilitation. 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. The review team 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;
- Burt Danovitz, nonfederal reviewer; and

- Dwight H. Bateman, representative, designated state unit (California Department of Rehabilitation).

III. MISSION AND DESCRIPTION

A2I was founded in 1976 and currently has three Part C grants from RSA. The first grant to South County was awarded in 1995; the second to Calexico in 1997; and the third to North County in 1998. A2I's mission is to promote full participation of people with disabilities. A2I has offices in San Diego, Escondido, and Calexico, California and serves Southern San Diego, Northern San Diego, and Imperial Valley counties. The three grants share the same governing board and management staff, including the executive director, Director of Administration, and financial and administrative support staff. There are IL specialists in each location and program managers who oversee IL staff.

In addition to providing the four IL core services, A2I is involved in the programs and projects described below on behalf of individuals with significant disabilities.

- **Assistive Technology Program** – This program provides service coordination, public education and outreach as well as information and referral on all types of assistive technology and related services.
- **Supportive Employment Program** – This program works with consumers on creating personalized resumes and cover letters, researching the best internet sites, perfecting their interviewing skills, finding job leads and upcoming job fairs as well as providing resources and services for people with disabilities.
- **Housing Options Program** – This program assists consumers with information and resources in locating accessible, affordable or shared housing through a housing registry. The program also assists consumers advocate for their rights under the Fair Housing laws.

To provide additional funding for these programs and projects, A2I benefits from funds donated through the Bernice Bernard Fund. This is a fund made available to A2I through donations honoring the memory of a former board member following her death. Since the establishment of the fund in March 2011, eleven consumers have benefitted from services provided.

IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

De-institutionalization and Nursing Home Transition: This program reaches out to consumers residing in nursing homes and other residential facilities and institutions to educate them and offer community-based residential options. When outreach results in a consumer expressing interest in transitioning from the residential facility, A2I staff works with the individual to develop an independent living plan that includes the necessary services to assist in their transition from the residential facility to the community, including the identification of accessible and affordable housing, funding sources, and other support services that may be necessary to live independently in the community. Since its inception 2007, A2I staff has successfully assisted 250 consumers to transition from residential facilities into community-based housing of their choice.

V. OBSERVATIONS AND RECOMMENDATIONS

During its review activities, RSA identified the observations below and made recommendations that A2I may consider.

1. IL goal definition and development

Observation: RSA observed that A2I IL specialists do not demonstrate a clear understanding of the distinction between an IL goal and the IL service(s) provided to consumers to achieve an IL goal. For example, assistive technology and home modification were the predominant IL consumer goals in the 30 CSRs randomly selected by RSA from the three locations: five at the Imperial Valley office in Calexico; 15 at the North County office in Escondido; and 10 at the South County office in San Diego. In over half of the CSRs reviewed from all locations, the goals did not address the broader goals or significant life areas (educational, employment, community based living, etc.) that the services were intended to help the consumers reach. In such cases, the CSRs did not fully reflect the purpose of the Title VII expressed in Section 701 of the Rehabilitation Act: “to maximize the leadership, empowerment, independence, and productivity of individuals with significant disabilities, and to promote and maximize the integration and full inclusion of individuals with significant disabilities into the mainstream of American society.” In other words, the CSRs focused on the means (assistive technology and home modification services) rather than the end (life goals related to independent living and community integration).

Moreover, the CSRs narratives did not adequately describe A2I’s staff role in assisting consumers to develop and achieve their IL goals through the provision of the four IL core services. A2I’s policy documents and publicity materials also seemed to emphasize assistive technology and home modifications services more than the four IL core services.

A2I staff explained that CFAL, the database used at the CIL, does not provide accurate goal definitions and goal categories. Therefore, helping a consumer develop goals that match those outlined for Title VII purposes in the 704 Part II Report is difficult. For example, a consumer requesting assistance obtaining Social Security benefits is categorized in the database as having a healthcare goal because that is the only category available for such a request.

Recommendation: RSA recommends that A2I:

- 1.1 provide training to staff of each grant on the development of goals and the maintenance of CSRs;
- 1.2 document goals and services appropriately;
- 1.3 consider exploring other databases that may be more appropriately in assisting the A2I staff to maintain CSRs; and
- 1.4 review and revise its service delivery manual and publicity materials to emphasize the four IL core services.

A2I Response: Access to Independence is revising its training policies and procedures to ensure that consumer service staff is able to provide better assistance when assisting consumers to develop effective goals as well as maintaining more effective consumer records.

- Access to Independence is also reviewing how goals and services are developed/provided to ensure that they are done most appropriately and, if need be, make changes as needed.
- Lastly, we are looking at possibly revising our service delivery manual as well as public relations materials to further highlight core services.
- We are in the process of reviewing the setup of our current database as well as considering alternative database options that might better suit our needs and address the issues included here.

2. Policies and Procedures

Observation: Regarding A2I's policies and procedures, RSA observed the deficiencies identified below related to A2I's services operating policies and procedures.

- **Consumer Appointment Policy:** A2I has a policy that indicates IL services are provided to consumers by appointment only. The staff explained since they primarily work with consumers in their homes or in the community, they established this policy to ensure that an IL specialist is available in the office. The staff explained that they do accommodate walk-ins. However, during the four days of the onsite, only one consumer visited the Imperial Valley location and six individuals signed into the San Diego office as consumers. Further review of A2I's sign-in register over a six month period documented that generally one consumer per day signed in.
- **Conflict of Interest Policy:** A2I has a conflict of interest policy but the policy does not address workplace nepotism.

Recommendation: RSA recommends that A2I make the following changes related to its policies and procedures:

- revise its IL service policy requiring consumers to make an appointment and revise to specify that consumers are not required to make an appointment in order to receive IL services at the CIL, and that walk-ins are allowed and encouraged; and
- develop and implement an anti-nepotism policy that protects against conflict of interest among staff and board members engaged in personal relationships.

A2I Response: Access to Independence strongly believes that an appointment policy is in the best interests of many of our consumers since many of our consumers travel using public transportation. Should a consumer arrive when staff are in trainings, community outreach events, off site with other consumers or otherwise engaged, the visit could be a potential waste of time and resources for our consumers. Our service area is large and our consumers are spread out throughout this area; and in San Diego, a city without adequate public transportation, we know this is the optimal way of delivering services to our consumers. Having said that, what we will do is change any language on marketing material that appointments are strongly encouraged for consumer convenience.

- Access to Independence will develop, implement and add an anti-nepotism component to its conflict of interest policy for Board members.

3. Lack of Board Involvement In Policy Development and Approval

Observation: There is no evidence that A2I's board is involved in the development and approval of policy related to center operations and service provision. For example, based on a review of the board minutes, there was no record that the board had provided any input on policies. In addition, the bylaws specify that the executive director will develop policies and procedures with approval by the board. However, there was no evidence of such involvement. Finally, while the board is currently comprised of eight members, the bylaws allow for 15 members and attendance of the eight is generally considerably lower than the required forum of four specified in the bylaws to conduct business. Therefore, currently, the board does not have adequate board participation to provide substantive input into policies.

Recommendation: RSA recommends that:

- 2.1 A2I board review all operating and service policies prior to their implementation in accordance with its bylaws; and
- 2.2 increase board participation up to the required forum in order to provide sufficient input into policy development and approval.

A2I Response: As a well-established organization, we do not change our policies and procedures routinely. When the Employee Handbook was revised and updated effective January 2010, the Board reviewed and approved that revision and these are the policies that the organization operates under. Having said that, the organization will make it a practice to have the Board review and approve its policy manual (Accounting, or IL) that it does not already review.

- Access to Independence applied for and has received a grant designed to improve our board policies and bring them into alignment with our bylaws. In addition, this grant will provide board training and development, which is designed to increase board participation.

VI. FINDINGS AND CORRECTIVE ACTIONS

RSA identified the compliance findings below. Within 30 days of receipt of the final report, A2I must submit a corrective action plan (CAP) to RSA for review and approval. The CAP should include: (1) the specific corrective actions that the CIL will undertake in response to each finding; (2) the methodology that the CIL will utilize to evaluate if each corrective action has been effective; and (3) the timetable for the implementation and evaluation of the corrective action.

RSA reserves the right to pursue enforcement action related to these findings as it deems appropriate, including the recovery of funds, draw down restrictions, funds withholding, or grant

terminations, pursuant to 34 CFR 74.60 and 34 CFR 74.62 of the Education Department General Administrative Regulations (EDGAR).

Finding 1: 704 Part II Reporting of Consumer Demographics

Legal Requirement:

34 CFR 364.35

In addition to complying with applicable EDGAR recordkeeping requirements, the State plan must include satisfactory assurances that all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain--

- (a) Records that fully disclose and document--
 - (1) The amount and disposition by the recipient of that financial assistance;
 - (2) The total cost of the project or undertaking in connection with which the financial assistance is given or used;
 - (3) The amount of that portion of the cost of the project or undertaking supplied by other sources; and
 - (4) Compliance with the requirements of chapter 1 of title VII of the Act and this part; and
- (b) Other records that the Secretary determines to be appropriate to facilitate an effective audit.

34 CFR 364.36 With respect to the records that are required by Sec. 364.35, the State plan must include satisfactory assurances that all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Secretary determines to be appropriate.

34 CFR 366.50(h) To be eligible for assistance under this part, an eligible agency shall provide satisfactory assurances that the applicant will conduct an annual self-evaluation, prepare an annual performance report, and maintain records adequate to measure performance with respect to the standards in subpart G.

34 CFR 366.50 (i) The annual performance report and the records of the center's performance required by paragraph (h) of this section must each contain information regarding, at a minimum (1) The extent to which the center is in compliance with the standards in section 725(b) of the Act and subpart G of this part (Cross-reference: See Sections 366.70(a)(2) and 366.73); (2) The number and types of individuals with significant disabilities receiving services through the center; (3) The types of services provided through the center and the number of individuals with significant disabilities receiving each type of service.

Facts and Analysis: A2I receives three Part C grants from RSA and is therefore required to submit a separate 704 Part II Report for each grant. The data reported in the 704 Reports is based primarily on data collected from A2I's CSRs. Based on a review of A2I's CSRs from each grant, RSA found that the data from the CSRs did not substantiate the data reported in the 704 Part II Reports. Therefore, the 704 Part II Reports are not statistically accurate as demonstrated below.

RSA randomly selected and reviewed 30 (thirty) CSRs from the three grants at A2I: five at the Imperial Valley office in Calexico; 15 at the North County office in Escondido; and 10 at the South County office in San Diego. The Calexico county office reported having 174 active CSRs, but all CSRs, both active and inactive, added up to only 97; the North County office reported 82 active CSRs but there were only 15 active CSRs; the South County office reported having 543 active CSRs but there were only 100. The total inactive CSRs for these two offices was 250. Staff explained that the difference in numbers stems from using a database that does not accurately report the CSR data. In addition, A2I does not have a quality assurance mechanism in place to ensure that information from CSRs is reported accurately for purposes of submitting valid data in the 704 Part II Reports.

While 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, CSR information and accompanying narratives were not always consistent in layout, format and quality. For example, the Imperial Valley office used older versions of forms and laid out consumer information in a way that was different from what was observed from reviewing CSRs at the other two A2I sites.

Finding: A2I is not in compliance with the requirements of 34 CFR 366.50(h) and 34 CFR 366.50 (i) because the review of CSRs from all three grants did not substantiate the data reported in the three 704 Part II Reports, and, therefore, the 704 Part II Reports are not statistically valid.

Corrective Action: A2I must take the steps necessary to report accurate data in its annual 704 Part II Reports consistent with the requirements at 34 CFR 366.50(h) and 34 CFR 366.50 (i).

Technical Assistance: In taking corrective action above, A2I should review and revise its training, supervision and quality assurance procedures related to case management and CSR documentation, including consumer forms. There should be uniformity in the maintenance of CSRs. Also, as part of its quality assurance duties, A2I's program manager may consider conducting a physical count of CSR information, and compare the numbers with that available in the database to ensure accuracy before including the information in the center's 704 Part II reports. As indicated in Observation 1 above, A2I may consider exploring other database systems to provide more accurate reporting.

Technical assistance on maintaining CSRs is also available for A2I staff through the CSR online tutorial available through ILRU at: <http://ilru.org/html/training/rapidCourses/index.html>. This module, the first in a three-part series, is offered by ILRU and covers the CSRs and ILPs fundamental federal requirements for record keeping and reporting, the importance of CSRs in meeting the reporting requirements for the annual federal 704 Part II Report of services and activities, and useful practices for gathering consumer information, developing ILPs, and maintaining complete and accurate records. The primary audience is front line workers in CILs and it is designed to be used in orientation and training for new CIL staff and as a refresher for existing staff.

A2I Response: A review of a database that will support our reporting requirements more completely is already in progress. The expectation is that the program managers responsible for overseeing consumer service records and case management will complete their evaluation of the alternative databases and make a recommendation to senior management by the end of the calendar year. We believe a new database as well as ongoing training will significantly impact this area.

Finding 2: CIL Work Plan

Legal Requirement:

34 CFR 366.50(d) To be eligible for assistance under this part, an eligible agency shall provide satisfactory assurances that—

... The applicant will establish clear priorities through—

(1) Annual and three-year program and financial planning objectives for the center, including overall goals or a mission for the center;

(2) A work plan for achieving the goals or mission, specific objectives, service priorities, and types of services to be provided; and

(3) A description that demonstrates how the proposed activities of the applicant are consistent with the most recent three-year State Plan under section 704 of the Act;

Facts and Analysis: A2I does not have a three-year program and financial plan for each grant. Also, A2I's current annual work plans do not include specific objectives. The goals included are not measurable and the work plan does not include strategies/action steps, responsible parties and timelines for achieving each goal, or the evaluation/method to measure goal performance. Additionally, the work plans do not include plans for training governing board members, employees, volunteers and consumers. Information provided to the review team by A2I staff indicated that they are not involved in developing the annual work plans. As a result of the above, A2I cannot evaluate the effectiveness of the work plans to determine where adjustments need to be made.

Finding: A2I is not in compliance with the requirements of 34 CFR 366.50(d) because A2I does not have a three-year program and financial plan for each grant developed and approved by the board. Additionally, A2I's annual work plans do not include specific objectives.

Corrective Action: A2I must take corrective action to develop a three-year program and financial plan and an annual work plan that includes specific objectives for each grant.

Technical Assistance: RSA encourages A2I to use data from its 704 Part II Reports and the goals/objectives and priority services outlined in the state plan for independent living to develop a three-year program and financial plan as well as an annual work plan that includes measurable goals and objectives, strategies/action steps, responsible parties and timelines for achieving each goal and objective, and the evaluation/method to measure goal performance. A2I's annual work plans should include plans for training governing board members, employees, volunteers and

consumers. A2I should involve staff and consumers in the annual work plan development process and solicit their input.

A2I Response: Access to Independence's Board of Directors and staff are taking the necessary corrective action to develop a three-year program and financial plan as well as annual work plans for each of its three VII C grants. Those annual work plans will include specific and measurable goals & objectives. In order to ensure that these goals are achieved, they will include:

- Strategies/action steps
- Responsible parties and
- Timelines
- Additionally, the work plans will include plans for training the Board of Directors, employees, volunteers and consumers
- Lastly, Access to Independence's staff will be involved in the development of future work plans, which will improve the effectiveness of the work plans and help us make adjustments throughout the year as may be needed.

Finding 3: Staff development and training

Legal Requirement:

34 CFR 364.24

The State plan must assure that the service provider establishes and maintains a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development program must emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

34 CFR 366.50(l) - To be eligible for assistance under this part, an eligible agency shall provide satisfactory assurances that—

(l) Staff at centers will receive training on how to serve unserved and underserved populations, including minority groups and urban and rural populations.

Facts and Analysis: Interviews with staff of each grant and information from the employee handbook indicate that A2I provides in-house training, but there is no formal ongoing annual staff development and training plan. For example, staff described spontaneous, on-the-job trainings primarily related to housing, benefits, systems advocacy and assistive technologies. However, there are no specific staff orientations or periodic training on IL history or philosophy. The training process, as described by A2I staff, lacks formal structure.

Finding: A2I is not in compliance with the requirements of 34 CFR 364.24 and 34 CFR 364.50(l) because it does not have a plan for staff of each grant and board training and development and does not have policies or procedures that address staff training.

Corrective Action: A2I must take the necessary steps to develop and implement a staff and board training and development plan based on staff needs consistent with the requirements in 34 CFR 364.24 and 34 CFR 364.50(1).

Technical Assistance: A2I may consider including such topics as CIL board roles and responsibilities, nonprofit governance, IL philosophy and history, program development and evaluation, as well as fundraising and resource development. As part of its training and development process, A2I may consider utilizing the training and technical assistance resources offered by the Independent Living and Resource Utilization, IL-NET.

A2I Response: Access to Independence has begun the process of developing and implementing a formal annual development and training plan for both staff and the Board of Directors. The training plans will provide specific staff and board orientations periodically on IL history and philosophy. Furthermore, once developed and implemented, this staff and board training & development plan will be consistent with the requirements in 34 CFR 364.24 and 34 CFR 364.50(1).

Finding 4: Ongoing Drug-free Workplace Program

Legal Requirement:

EDGAR 84.215 - You must establish an ongoing drug-free awareness program to inform employees about--

- (a) The dangers of drug abuse in the workplace;
- (b) Your policy of maintaining a drug-free workplace;
- (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
- (d) The penalties that you may impose upon them for drug abuse violations occurring in the workplace.

Facts and Analysis: A2I states that it provides information to all staff of each grant about the requirements to have a drug-free workplace when the individual is hired but there is no official documentation that the employees had the policies explained to them. The policies are also contained in the personnel manual that is provided to each A2I employee. However, A2I does not have any ongoing drug-free awareness program to remind and update the employees of the policies, resources and the consequences of not following the policies.

Finding: A2I is not in compliance with EDGAR 34 CFR 84.210 and 84.215 because there was no documentation confirming that the employees of each grant received a copy of the drug free workplace statement nor that it has established an on-going drug-free workplace awareness program to educate its staff about the dangers of drug usage, A2I policies, resources, and the consequences regarding noncompliance with the policies.

Corrective Action: A2I must develop a means of documenting that the employees of each grant have been informed of the drug-free workplace policies and implement an ongoing drug-free awareness program that addresses the requirements in EDGAR 34 CFR 84.210 and 84.215.

Technical Assistance: One way A2I may ensure compliance with the ongoing drug-free workplace awareness program requirement is to dedicate time periodically at staff meetings to conduct an overview of the drug-free workplace policies and resources and document this activity in meeting minutes along with the list of staff from each grant participating in the meeting. This documentation could then serve as the official record that it meets the requirement to establish an ongoing drug-free awareness program.

A2I Response: The finding above states that "A2I is not in compliance...because there was no documentation confirming that the employees of each grant received a copy of the drug free workplace statement...." This is not true. Every employee of Access to Independence has received and signed a document addressing our ongoing drug-free workplace awareness. These documents were in every employees personnel file during the review.

- While we do have documentation informing every employee about our ongoing drug-free workplace awareness, Access to Independence is in the process of acquiring a video that will better inform employees of our ongoing drug-free workplace awareness. Once obtained, this video will be shown at least annually to every employee and each employee will sign a document indicated that they have seen the video and that documentation will be included in their personnel file.

RSA Response: This is to clarify that the finding concerns the fact that none of the personnel files reviewed contained documentation as evidence that A2I had established or provided to its staff any ongoing drug-free workplace program or training.

Finding 5: Cost Allocation Plan

Legal Requirement:

The Education Department General Administrative Regulations (EDGAR) in 34 CFR 74.27 provide that the allow ability of costs is determined in accordance with the cost principles applicable to the entity incurring the costs.

EDGAR 76.560 addresses general indirect cost rates exceptions; EDGAR 76.561 deals with approval of indirect cost rates; EDGAR 76.563 outlines the programs covered by restricted indirect cost rate requirements; and EDGAR 76.564 addresses restricted indirect cost rate formula.

The Office of Management and Budget (OMB) Circular A-122, "Cost Principles for Non-Profit Organizations," governs cost principles for nonprofit organizations. OMB Circular A-122 provides that the federal government bear its fair share of costs, except where restricted or prohibited by law, and that in order to be allowable under an award costs charged must be allocable to that award. A cost is allocable to a particular grant award in accordance with the relative benefits received under that award.

Facts and Analysis: RSA could not confirm that A2I distributes administrative costs among its separate grants and other funding sources in an equitable manner because it does not have a U.S.

Department of Education-approved cost allocation plan (CAP) for each of its three grants. In February 2012, A2I's executive director sent an e-mail to Mary Gougisha and Frances Outland of the U.S. Department of Education OCFO/FIPAO/ICG, the office responsible for receiving and approving indirect cost rates and cost allocation plans, in which he stated that he believed that A2I previously received approval of an earlier cost allocation plan from the Department of Education though he did not have any concrete evidence to that effect.

Finding: At the time of the on-site review, A2I did not have a U.S. Department of Education-approved cost allocation plan for each of its three grants. Therefore, RSA could not confirm that A2I distributes administrative costs among its three Part C grants and other funding sources in an equitable manner.

Corrective Action: A2I must take all necessary steps to ensure that A2I has an ED-approved cost allocation plan for each of its three grants. A2I must follow up with the U.S. Department of education to ensure that A2I submits either an indirect cost rate proposal or a cost allocation plan in accordance with OMB Circular A-122.

Technical Assistance: The RSA Commissioner Memorandum of May 2004, clarifies the requirements for allocating indirect costs to federal grant awards received by CILs, particularly with respect to awards received under Title VII, Part C, of the act. As technical assistance, a copy of the commissioner memorandum is attached to this draft report. RSA has also provided a sample to A2I to use to develop an approvable cost allocation plan.

For further guidance and to expedite the approval process, A2I should continuously contact Mary Gougisha of the Department's Indirect Cost Group at Mary.Gougisha@ed.gov.

A2I Response: Access to Independence developed a cost allocation plan and submitted it to Mary Gougisha at the U.S. Department of Education on February 8, 2012. While not yet approved, Access to Independence has been effectively allocating its expenses utilizing this cost allocation plan and could have easily demonstrated that to the review team. Access to Independence's Executive Director and Director of Administration have since spoken with Ms. Gougisha and, based on our conversation with her about our plan, we expect that the organization's cost allocation plan will be approved by the U.S. Department of Education in early September.