



CENTERS FOR INDEPENDENT LIVING COMPLIANCE REVIEW REPORT

Central Coast Center for Independent Living (CCCIL)

Grant Award Numbers: H132A970014 and H132A970008

Salinas and Capitola, CA

REVIEW DATES: January 8-10, 2014

Draft Report: May 8, 2014

CIL Response: May 9, 2014

Final Report: May 14, 2014

REHABILITATION SERVICES ADMINISTRATION

TABLE OF CONTENTS

I.	PURPOSE OF THE ON-SITE MONITORING REVIEW	1
II.	METHODOLOGY	1
III.	MISSION AND DESCRIPTION	2
IV.	SPECIALIZED SERVICES AND PROGRAMS	2
V.	OBSERVATIONS AND RECOMMENDATIONS.....	3
VI.	FINDINGS AND CORRECTIVE ACTIONS.....	3
VII.	TECHNICAL ASSISTANCE.....	3

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 Central Coast Center for Independent Living (CCCIL) was conducted from January 8-10, 2014. The program review covered CCCIL's 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. 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 participants included:

- Elizabeth Akinola, RSA IL program specialist;

- Rebecca Coffin, nonfederal reviewer; and
- Dwight Bateman, California Department of Rehabilitation.

III. MISSION AND DESCRIPTION

CCCIL's mission is to promote the independence of people with disabilities by supporting their equal and full participation in life. CCCIL serves Santa Cruz, Monterey, and the San Benito tri-county areas. CCCIL was first awarded a RSA grant under Title VII of the Rehabilitation Act in 1992.

IV. SPECIALIZED SERVICES AND PROGRAMS

In addition to the required four core services, CCCIL provides the specialized services and programs described below.

- **Assistive Technology (AT):** This program provides referrals to consumers to available pertinent services, vendors, training and potential funding resources. CCCIL staff works with consumers to identify how to acquire, fund, fit, customize, maintain, and/or repair AT. Staff also conducts community outreach to raise awareness of AT to people with disabilities, families, service providers, media, elected leaders, and policy makers.
- **Device Lending Library:** This program is funded through the Assistive Technology Network of California to provide short term loans of assistive devices and gadgets that can help consumers live independently. Consumers are able to choose from a variety of devices ranging from easy to use "low-tech" to more advanced "high-tech." Loans are made for an initial 30-day period and can be extended to a longer period, provided there are no other requests for the same device.
- **New Options/Traumatic Brain Injury (TBI) program:** This program was started in 1990 through a grant from the California Department of Mental Health to provide a caring coordinated continuum of services for adults with TBI in Santa Cruz County. New Options offers four monthly support groups, quarterly education events and ongoing networking meetings with other agencies in the county that provide services to people who care about brain injury. The program provides information about local resources and assistance in identifying, accessing, utilizing and coordinating services needed by individuals with TBI and their families. It also provides a variety of services to increase or maximize the individual's ability to live in the community and participate in community life. For example, staff uses individualized approaches to provide support and training in an individual's place of residence to improve independence in the home. Services may also include prevocational or educational services necessary for an individual to function effectively in the workplace. CCCIL is a member of Traumatic Brain Injury Services of California (TBISCA), a coalition comprised of seven organizations serving persons with TBI. The coalition provides a unified voice for TBI survivors, their families and the community through collaborative partnerships, legislative advocacy, TBI education, and Accessible Technology. In FY 2013, CCCIL worked with 66 TBI participants to create Individualized Service Plans and to achieve their goals. Staff also responded to 400 inquiries for information and referral. Annually, the CIL expends \$132,000 on this program.

V. OBSERVATIONS AND RECOMMENDATIONS

During its review activities, RSA did not identify any observations and recommendations.

VI. FINDINGS AND CORRECTIVE ACTIONS

During its review activities, RSA did not identify any findings and corrective actions.

VII. TECHNICAL ASSISTANCE

During the review process, RSA provided technical assistance to CCCIL in the areas described below.

- **Protecting consumer confidentiality:** Consumers' names are written on the back of each CSR maintained by CCCIL. To protect confidentiality, it is important that staff uses identification numbers and/or initials on the back of folders containing CSRs, not the full names of consumers.
- **Board financial reports:** CCCIL should consider including a comparison of actual to budgeted figures in the financial statement provided to the Board of Directors. This will give the board the clear picture of the center's financial situation necessary for making important budget decisions.
- **Travel costs:** It is important to separate out the travel reimbursement sheets for each contract/program on the travel form to ensure that travel costs are charged to the appropriate funding source.
- **Disposition of property:** CCCIL's policy for disposal of equipment should include specific procedures on how to appropriately dispose of equipment and electronic information stored in computer hardware. CCCIL does dispose of outdated property but there are no written procedures to ensure consistency in doing so.
- **Evaluation and performance appraisal:** Consistent with CCCIL's policies and procedures, the board should conduct the annual performance appraisal of the Executive Director, and the Executive Director should conduct the annual performance appraisal of the Associate Director.
- **Updating the CIL's cash disbursement policy to reflect that the board countersigns checks over \$500:** The policy change made at a recent board meeting requiring the board to countersign for all checks over \$500 should be included in the accounting procedure manual replacing the current policy requiring the board to countersign for all checks.

CCCIL Response: CCCIL identified the following correction regarding the annual performance appraisals above: the board conducts the annual performance appraisal of the Executive Director and the Executive Director conducts the annual performance appraisal of the Associate Director. CCCIL indicated that it has already made changes with respect to the technical assistance identified above.

RSA Response: RSA corrected the technical assistance above related to the conduct of performance appraisals.