



CENTERS FOR INDEPENDENT LIVING

COMPLIANCE REVIEW REPORT

Soyland Access to Independent Living (SAIL)

GRANT #s: H132A960009
H132A980833
H132A010041

REVIEW DATES: April 13 – 15, 2011

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Final Report: October 28, 2011

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* (the 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 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 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 was conducted April 13 – 15, 2011. The program review covered the independent living (IL) operations and activities of Soyland Access to Independent Living (SAIL). The financial review examined the center's participation in Title VII, Part C, of the 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 included the following individuals:

- Felipe Lulli, RSA program specialist;
- Frieda Kliewer, Sandra Beasley CIL, Enid, Oklahoma, nonfederal reviewer; and

- Ken Williams and Sue Johnson-Smith, designated state unit representatives (Illinois Department of Human Services, Division of Rehabilitation Services).

Note: The Statewide Independent Living Council (SILC) chair, William Gorman, was invited but could not participate due to a previous engagement.

III. MISSION AND DESCRIPTION

According to the CIL's Strategic Plan, SAIL's mission and purpose is to:

- promote independent living for all people with disabilities;
- encourage and assist people with disabilities to gain effective control of their lives by participating in all aspects of society to their fullest extent possible, especially in performing routine daily activities; and
- promote the personal dignity of all people with disabilities and develop community awareness.

SAIL administers three CILs through IL Part C funds provided by RSA under Title VII, Chapter 1, Part C, of the *Rehabilitation Act of 1973, as amended*. SAIL's first IL Part C grant (H132A960009), located in Decatur, was awarded by RSA in 1996 to serve the counties of Macon, Moultrie and Shelby, Illinois. The second RSA grant (H132A980833) was awarded in 1998 to expand SAIL's outreach activities in Moultrie and Shelby counties. (This CIL has its main office in Sullivan, with a second office in Shelbyville.) The third RSA grant (H132A010041), located in Charleston, IL, was awarded in 2001, and authorizes SAIL to serve the counties of Cole, Clark and Cumberland, Illinois. SAIL's three IL Part C-funded CILs share the same governing board and management and fiscal staff, as well as certain service delivery staff.

Aside from the city of Decatur in Macon County, SAIL's combined IL Part C-funded service area of 3,059 square miles is mostly rural. While Decatur has a significant African-American population and a small yet growing number of Hispanics, the overwhelming majority of the population in SAIL's service area is Caucasian. In addition, the counties of Moultrie and Shelby have a significant aging population. SAIL's primary service delivery obstacle is the lack of accessible public transportation in six counties, particularly outside of Decatur.

In addition to its IL Part C-funded service area, SAIL-960009 uses other federal funds authorized by the Rehabilitation Act to serve two other counties, specifically, Division of Rehabilitation Services-provided Title I funds for youth transition services in Piatt County and Bureau of Blind Services Title VII, Chapter 2, funds for independent living services to older individuals who are blind in Logan County.

Aside from the four IL core services of information and referral, IL skills training, peer counseling and individual and systems advocacy, SAIL provides the programs for individuals with significant disabilities described below.

Community Reintegration: Assists individuals, ages 18 to 59 and living in nursing homes, to move back into the community and live independently.

- **Deaf Services:** Assists the deaf and hard of hearing with independent living issues by providing advocacy, interpreter referral, interpreter training and assistive devices.
- **Youth Transition:** Provides supports and services to parents of students with disabilities, including support groups, transition planning, and Individualized Education Plan meeting preparation.
- **Personal Assistants (PA) Program:** Empowers consumers who want to recruit and manage their own PAs, including PA management training, prospective PA orientations and referral list of available PAs.
- **Children's Assistive Technology Lab:** Assists parents in the development of their children's educational, recreational and independent daily living skills such as eating, mobility, critical thinking and communication.
- **Illinois Department on Aging's Circuit Breaker Program:** Provides grants to senior citizens and persons with disabilities to help them reduce the impact of property taxes and prescription medications costs on their lives.
- **Assistive Technology Lab:** Helps adults in acquiring/maintaining daily living skills such as dressing, cooking, eating, mobility and communication.
- **Visual Services Lab:** Offers equipment for the blind and visually-impaired and provides catalogs and pricing information to consumers wishing to make purchase equipment.
- **Independent Living Services for Older Individuals Who Are Blind Program:** Provides assistance and support to individuals 55 and over experiencing vision loss or blindness. Along with in-home assessments to eliminate barriers in accomplishing daily tasks, SAIL assists in the purchasing of low vision eye examinations and recommended devices.

Unless otherwise noted, the analyses, findings and observations in this report refer to all three of SAIL's CILs. Those that relate to the Macon County service area, the corresponding CIL is referenced as SAIL-960009. The CIL in Moultrie and Shelby service area is referenced as SAIL-980833, and the Cole, Clark and Cumberland CIL is referenced as SAIL-010041.

IV. ORGANIZATIONAL STRENGTHS

The review team noted SAIL staff's dedication, knowledge and team focus in delivering individual IL services and conducting community-based activities. The team observed a high degree of consumer satisfaction with SAIL's services, as measured by the impressive number of consumers (33 individuals, or one-fifth of SAIL's Macon, Moultrie and Shelby consumers) who attended the consumer feedback meeting as well as the overwhelmingly favorable content of their feedback.

Most of the staff and, to a lesser extent, some board members are actively involved in SAIL's extensive disability awareness and systems advocacy activities throughout the service areas of the three CILs. SAIL focuses on accessible public transportation as one of major system advocacy priorities, and participates in several groups such as the Human Services Transportation Plan Technical Committee, the Macon County Transit Partnership Group and the Central Illinois Public Transit Advisory Board. Last March, the Transit Partnership Group announced, at SAIL's Decatur office, that an accessible public transportation system will start in rural Macon County by the end of 2011.

The governing board is fully invested in the IL philosophy, has forged an excellent relationship with SAIL staff, and appears to have achieved an effective balance in its programmatic and financial oversight of the CILs. SAIL is taking a proactive approach to increasing the number and diversity of its board. Together with staff, SAIL's board has developed a profile of demographic, professional and other qualities of prospective new members, and actively recruits new members among current or former consumers, partner organizations, vendors and past members. Potential members are assessed through a three-step interview process. Finally, SAIL hosts periodic board candidate receptions to give prospective members the opportunity to meet SAIL's current staff and board members. Ten prospective members attended such a reception during RSA's on-site review.

V. OBSERVATIONS AND RECOMMENDATIONS

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

1. Outreach

Observation: RSA observed the following 704 Report data and circumstances suggesting the need for SAIL to increase the number and diversity of its consumer base:

- According to SAIL's consumer lists, over 71 per cent of SAIL-960009 and 76 per cent of SAIL-980833's consumers were at least 60 years old in FY 2010. Between 41 and 82 per cent of both CILs' consumers were blind or visually-impaired. (The higher percentage reflects "Multiple Disabilities" consumers who, as explained in Finding 3, consist mostly of individuals for whom vision loss is the primary disability.) Virtually all of these consumers were served under the Independent Living for Older Individuals who are Blind program funded through Title VII, Chapter 2, of the Rehabilitation Act.
- The consumer lists indicate that 11 per cent of SAIL-960009's Macon County consumers were African-Americans in FY 2010, compared with the group's 15 percent share of the Macon County population (according to the U.S. Census Bureau's 2009 QuickFacts).
- SAIL-010041's consumer lists indicate greater age and disability status diversity. However, the CIL served only 27 consumers in FY 2010 (one in Cumberland County) even though it receives the largest of SAIL's three IL Part C grants.). According to its 704 Report, only one SAIL-010041 consumer received IL skills training; two received peer counseling services; and five received advocacy services in FY 2010.
- Less than half (88 out of 198) of the three CILs' CSRs represented new consumers in FY 2010. In the case of SAIL-980833, for example, sixty-five per cent of the FY 2010 CSRs were carried over from a previous fiscal year.
- SAIL-960009 is located in the middle of a sprawling industrial park. Though public transportation is available across the street, the location is very hard to find by car and is hardly conducive to walk-in consumer activity.

Recommendation: RSA recommends that the staff and board develop and conduct outreach strategies to increase the numbers and diversity of its consumers and services, with a focus on the four IL core services. These strategies may include the following:

- assessing community needs and available resources (internal and external) for reaching more consumers within each CIL's service area (Information and referral inquiries offer a valuable needs assessment tool as well as an opportunity to encourage callers to become SAIL consumers.);
- establishing specific consumer and IL service targets for each CIL and incorporating these goals in SAIL's strategic plan;
- identifying and engaging potential community partners (current and new) , e.g., local churches, to reach the rural and minority populations;
- providing staff and board with training for reaching unserved and underserved populations, including minority and rural populations (see Finding 4); and
- assessing SAIL-960009's present location and identify strategies to increase its public visibility and accessibility, for example, by including detailed a map and direction on SAIL's website and printed materials.

SAIL may consider utilizing the training and technical assistance resources offered by the Independent Living and Resource Utilization's CIL-NET project as well as locally available community resources.

SAIL Response: SAIL has been collaborating with five inner city churches to conduct presentations on SAIL programs and services. In addition, during July 2011, the Decatur SAIL office's Disability Awareness Team contacted community service agencies, schools and service organizations in Macon County to schedule presentations on SAIL programs and services. In January 2009 SAIL identified the need by people with disabilities to have assistance in the application process. During FY 2011 SAIL opened CSRs for consumers whom the CIL previously assisted through the Circuit Breaker/Illinois CaresRx and Low Income Home Energy Assistance programs and whose access to health care and transportation was expanded. As a result of the foregoing activities, SAIL has increased the number of its consumers from underserved populations and has enhanced awareness about its IL services in Macon, Moultrie, Shelby, Coles, Clark and Cumberland Counties. Finally, SAIL is working with its website provider to make its center more accessible by placing a map along with directions on its website.

2. Independent Living Plans (ILPs)

Observation: Based on RSA's review of 15 CSRs, SAIL's current ILP procedures and associated forms meet the minimum federal requirements. However, they are not conducive to realizing the consumers' potential benefits of establishing an ILP, for the below reasons.

- The ILP form does not have space for recording the IL services, and corresponding timelines, to be provided in support of the consumers' goals.
- In the ILPs reviewed by RSA, the items often listed as consumer goals (e.g., computer training, assistive technology may be more aptly described as services, rather than goals, because they seldom address the significant life areas (educational, employment, community-based living, etc.) that IL services are intended to impact. Moreover, the CSR narratives that RSA reviewed did not indicate that IL specialists encouraged consumers to think in terms of significant life areas in addition to services.

- The CILs' IL service delivery manual does not explain the ILP requirements or potential benefits outlined in 34 CFR 364.53, including the requirement that the plan be reviewed and updated at least annually.

Recommendation: RSA recommends that SAIL consider the following initiatives to maximize the benefits that consumers derive from their ILPs:

- revise its ILP form, for example, to include space for recording the IL services, and corresponding timelines that the CIL will provided in support of each IL goal;
- incorporate in the CSR service standards and service delivery manual more information about ILPs and their potential benefits for consumers; and
- provide the corresponding staff and board training.

SAIL Response: SAIL has revised its Independent Living Plan and Long Range Independent Living Vision forms to include Significant Life Area goals. Also, SAIL has drafted a revised consumer services policy manual that will be presented to the SAIL Board of Directors for approval. Staff will receive training on the revised policy manual.

3. Program and Financial Planning Objectives

Observation: SAIL's strategic plan meets the minimum federal requirements for annual and three-year program and financial planning objectives. However, RSA team observed that the Strategic Plan's effectiveness as program and financial planning tool is limited by its lack of:

- specific measurable outcomes targets for each of SAIL's CILs/per year;
- timelines and assignments for achieving these targets; and
- strategies related to priorities identified by SAIL staff and board members during the RSA review, such as resource development and board recruitment.

In addition, SAIL's strategic plan is not reflected in the work plan submitted in the 704 Reports (subpart V).

Recommendation: RSA recommends that SAIL revise to its strategic plan by adding specific:

- measurable outcomes targets for each of SAIL's CILs per year;
- timelines and assignments for achieving these targets; and
- strategies related to priorities identified by SAIL staff and board members during the RSA review, such as resource development and board recruitment.

RSA recommends that that SAIL reflect the revised strategic plan objectives, targets and timelines in SAIL-96009, SAIL-980833 and SAIL-010041's respective 704 Report work plans. In implementing RSA's recommendations, SAIL may wish to identify strategic planning training resources that may be locally available to nonprofit boards and staff.

SAIL Response: On September 15, 2011, SAIL's governing board and administrative received training regarding strategic plan and annual work plan development. In addition, SAIL conducted a three-day program planning session for staff to develop the FY 2012 work plans for

inclusion in the corresponding 704 Reports required by RSA and the Illinois Division of Rehabilitation Services.

VI. FINDINGS AND CORRECTIVE ACTIONS

RSA identified the compliance findings below. Within 30 days of receipt of the final report, SAIL 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.

1. Equal Access

Legal Requirement:

34 CFR 366.63(a)(4). The center shall provide evidence in its most recent annual performance report that it (i) Ensures equal access of individuals with significant disabilities, including communication and physical access, to the center's services, programs, activities, resources, and facilities, whether publicly or privately funded.

Facts and Analysis: SAIL mostly complies with this requirement, including the provision of ramps connecting the CILs' parking lots to the front entrances. However, at SAIL-960009's parking lot, the access ramp had a very steep incline and the asphalt at its base was badly damaged, creating a hazardous gap between the parking lot and the ramp. SAIL's management staff acknowledged that the access ramp does not meet the minimum requirements of the Americans with Disabilities Act (ADA) or the Illinois state standards. SAIL is well aware of this issue and has been working with the property owners and managers to have the necessary repairs and reconstruction completed as soon as possible.

Finding: SAIL-960009 is not meeting the requirements of 34 CFR 366.63(a)(4) because the degree of the parking lot ramp's incline and the asphalt damage at the base of the ramp impairs the equal access of individuals with significant disabilities, especially those with physical disabilities or visual impairments.

Corrective Action: SAIL-960009 must continue to work with the property owners and managers to ensure that the incline of the ramp, and the damage around it, are repaired in the most timely manner possible, in accordance with ADA and Illinois state standards.

SAIL Response: On June 29, 2011, the building property management company poured a new ramp meeting the ADA accessibility requirements. SAIL measured the new ramp and confirmed that the new ramp measured 71 inches and accommodated a three-quarter inch rise.

RSA Response: The corrective action for this finding has been completed.

2. Opportunity to Express Consumer Satisfaction

Legal Requirement:

34 CFR 366(c)(1). The center shall provide evidence in its most recent annual performance report that it (iii) Provides opportunities for consumers to express satisfaction with the center's services and policies in facilitating their achievement of IL goals and provides any results to its governing board and the appropriate SILC.

Facts and Analysis: SAIL conducts consumer satisfactory surveys for its Personal Assistants program. However, SAIL currently lacks a process or method for consumers to express satisfaction or dissatisfaction with the center's IL services or policies under the IL Part C program funded by RSA. As a result, the CILs lack a reliable means to assess the quality and timeliness of their IL services.

SAIL staff informed RSA that the Illinois SILC is developing a statewide consumer satisfaction instrument and the CIL plans to tailor its consumer satisfaction instrument based on the statewide instrument tool.

Finding: SAIL is not meeting the requirements of 34 CFR 366(c)(1) because process or method for providing consumers with opportunities to express satisfaction with the center's services and policies in facilitating their achievement of IL goals or for providing any results to its governing board and the appropriate SILC.

Corrective Action: SAIL must take corrective action to ensure that it establish a process and method to provide opportunities for consumers to express satisfaction with the center's services and policies in facilitating their achievement of IL goals, in accordance with 34 CFR 366(c)(1). The corrective action must include a process for providing any results to its governing board and the appropriate SILC.

Technical Assistance: As part of this corrective action, RSA recommends that SAIL consider:

- developing a consumer satisfaction survey;
- describing its consumer feedback opportunities and processes in its Program Manual and its printed materials such as the Program Standards statement provided to consumers and filed in the CSRs; and
- providing staff and board training regarding its consumer feedback opportunities and processes.

SAIL Response: The Illinois SILC's Satisfaction Survey Committee drafted a model consumer satisfaction survey for use by the CILs in the statewide network. SAIL will use this model survey to conduct a trial survey distribution during fall 2011. Trial survey results will be tabulated and shared with the SAIL Board of Directors, the Statewide Independent Living Council and RSA by January 31, 2012. Pending approval of the final consumer survey, SAIL will officially conduct the consumer satisfaction survey by October 15, 2012, and forward the completed surveys to Western Illinois University for the tabulation of statewide and individual CIL results. Thereafter, SAIL will conduct annual consumer satisfaction surveys and submit the survey results to the SAIL governing board and the Statewide Independent Living Council. The trial survey results, to be shared with RSA by January 31, 2012, will constitute documentation of SAIL's completion of the corrective action plan for this finding.

RSA Response: RSA approves this corrective action plan.

3. Annual Performance Report

Legal Requirement:

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 Secs. 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: The review team concluded that the information provided in SAIL CILs' FY 2010 annual performance reports (704 Reports) is not statistically accurate and/or verifiable, for the reasons described below.

- The numbers for total consumers, ILPs/ ILP waivers. CSRs closed with all goals met, and consumers' demographic characteristics in the 704 Report (subpart II) do not match the corresponding numbers on the consumer lists provided by the CIL. For example, SAIL-960009's 704 Report indicates 120 CSRs compared to 128 on the consumer list, and 86 consumers aged 60 and older compared to 91 on the consumer list. SAIL-980833's 704 Report indicates that 35 of its 42 consumers had ILPs compared to 38 ILPs on the consumer list; claims four CSRs closed with all goals met compared to two on the list; and identifies 18 consumers having "Multiple Disabilities" compared to 26 on the list. SAIL-010041's 704 Report indicates 29 CSRs compared to 27 on this list; identifies three consumers aged 60 or older compared to one on the consumer list; and identifies 27 consumers as white compared to 25 on the list.
- The "Multiple Disabilities" category accounted for a disproportionate number of the CILs' consumers in the 704 Report (subpart II, section H). Specifically, 50 (41%) of SAIL-960009's consumers and 18 (42%) of SAIL-980833's consumers were identified as "Multiple Disabilities." According to the SAIL staff, blindness/visual impairment was the primary disability in most these cases but the consumers were systematically classified under "Multiple Disabilities" whenever they had a secondary disability. Hearing impairment is the most common secondary disability.
- According to SAIL's management staff, the CILs' 704 Reports (Subpart III, section A) over-reported information and referral services and underreported peer counseling services in FY 2010, because IL specialists are not adequately documenting these services in the CSRs.
- It is not possible for RSA to verify the number of Significant Life Areas (SLA) goals set or goals met reported in the 704 Report (subpart II, section B, Item 1), because the SLA

list used in the CSRs do not match the SLA list in the 704 Report. The CSRs' SLA list is based on an older (pre-2006) 704 Report pre-print that did not include Community-Based Living, Community/ Social Participation and Relocation from a Nursing Home or Institution, among others. In addition, RSA was unable to verify the numbers of SAIL consumers requiring or achieving access to previously unavailable transportation, health care services or assistive (704 Report, subpart III, section B, Item 2), because SAIL has not established criteria or procedures for determining this information.

It appears that SAIL's management staff had identified some of these deficiencies prior to RSA's review and had already started taking steps to rectify this situation, for example, through enhanced CSR quality assurance and staff training.

Finding: SAIL is not meeting the requirements of 34 CFR 366.50(h) because annual performance report and supporting records are not adequate to measure performance with respect to the standards in subpart G.

Corrective Action: SAIL must take corrective action to ensure that its CSR documentation, data collection and 704 reporting systems are accurate and sufficient to measure the CILs' performance with respect to the standards in subpart G, as required by 34 CFR 366.50(h). Among other things, the CSRs must include the current and complete list of SLAs, with corresponding definitions. In addition, SAIL must correct, revise and re-submit its FY 2010 704 Report and assure RSA that its corrective actions will ensure that the FY 2011 704 Reports will have accurate and reliable information.

Technical Assistance: To achieve compliance with this finding, RSA encourages SAIL to continue developing its emerging CSR quality assurance and staff training protocol. In particular, SAIL may consider developing clear criteria for classifying consumer disabilities, IL services, goals related to significant life areas, and access to previously unavailable transportation, health care and assistive technology, and revising its program policies and procedures accordingly.

SAIL Response: In May 2011, SAIL staff reviewed and discussed the program services sub-codes, Significant Life Area goals, and peer counseling services reporting. Also, SAIL updated all open ILP consumer files and blank files with goals related to the Significant Life Areas. In June 2011, SAIL contacted its CSR data collection software provider to determine how the CIL could improve its IL consumer, service and outcome records maintenance and reporting, consistent with 34 CFR 366.50(h). As of July 8, 2011, all current consumer files in the data collection system have been updated to ensure that disabilities are classified by the consumer's primary disability. After conducting a data integrity test and consumer cross-check, SAIL submitted the revised FY 2010 704 Report data in the RSA MIS.

RSA Response: RSA reviewed and approved the revised 704 Report data on October 26, 2011, and considers the corrective action for this finding to be completed.

4. Unserved/Underserved Populations Outreach Training

Legal Requirement:

34 CFR 366.50(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: Although SAIL-960009's service area includes a significant proportion of African-Americans, and that SAIL-980833 and SAIL-010041 serve predominately rural populations, SAIL staff have not received training on how to serve unserved and underserved populations, including minority groups and urban and rural populations.

Finding: SAIL is not meeting the requirements of 34 CFR 366.50(l) because its staff have not received training on how to serve unserved and underserved populations, including minority groups and urban and rural populations.

Corrective Action: SAIL must take corrective action to ensure that its staff receive training on how to serve unserved and underserved populations, including minority groups and urban and rural populations, in accordance with 34 CFR 366.50(l).

Technical Assistance: SAIL may consider utilizing the training and technical assistance resources offered by the Independent Living and Resource Utilization's (ILRU) CIL-NET project as well as locally available community resources.

SAIL Response: SAIL has contacted ILRU regarding unserved and underserved populations outreach training. It has also contacted the Illinois Division of Rehabilitation Services' Independent Living Unit for technical assistance in this regard. In addition, SAIL has expanded its outreach to these populations by collaborating with five inner city churches; identifying individuals in need of the Circuit Breaker/Illinois CaresRx and Low Income Home Energy Assistance Program services; and increasing its community awareness activities in Macon, Moultrie, Shelby, Coles, Clark and Cumberland counties. SAIL has noticed increases in the number of consumers and the IL outcomes (including access to health care and transportation) achieved among unserved and underserved populations as a result of these activities. SAIL intends to complete its corrective action for this finding by collaborating with ILRU and/or the Illinois Division of Rehabilitation Services to develop a training/technical assistance plan and presenting the plan to RSA by December 31, 2011.

RSA Response: RSA approves this corrective action plan.