



CENTERS FOR INDEPENDENT LIVING  
COMPLIANCE REVIEW REPORT

Paraquad

Grant Award Number: H132A9370

**REVIEW DATES:** July 9-11, 2012

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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 of the Rehabilitation Act. 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 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 July 9-11, 2012. The program review covered the independent living (IL) operations and activities of Paraquad, and the financial review examined the center's 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), personnel files, 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:

- Deborah A. Cotter, RSA Grants Management Specialist;
- Judith Barrett, non-federal reviewer; and

- Tonya Fambro, Missouri Independent Living Director, DSU representative, participating as an observer.

### **III. MISSION AND DESCRIPTION**

The mission of Paraquad is to empower people with disabilities to increase their independence through choice and opportunity. Paraquad envisions that the center will be a leader in advancing the independent living philosophy. Paraquad envisions an integrated community in which people with disabilities are valued and participate in all aspects of society.

Originally founded in 1970, Paraquad was among the first CILs to receive federal funds through the Centers for Independent Living Program. The federally funded service areas include the St. Louis metropolitan area, including St. Louis City, Franklin, St. Louis, and Gasconade counties.

In addition to providing the four IL core services, Paraquad is involved in 11 other programs and projects on behalf of individuals with significant disabilities, some of which are described below.

**Accessible Exercise Program** - Paraquad's Health and Wellness Center is fully accessible. In addition to equipment found in most gyms, the center provides classes on wellness and nutrition that consumers reported were helpful in addressing health issues.

**Deaf Way Interpreting and Community Services** – This program promotes independence and access to opportunities for people who are deaf. Trained staff assist participants to identify and address personal goals.

**Education Services** – This program offers a variety of educational and personal growth opportunities to people with developmental disabilities and enables participants to live more independently. The program represents a dynamic partnership between community volunteers who teach the classes, educational institutions, and public and private donors.

**Employment Assistance** - As a vendor of the Missouri Department of Vocational Rehabilitation and the Productive Living Board of St. Louis County, Paraquad's Employment Program offers assistance and support to enable eligible individuals with disabilities to receive training, obtain a job, and be a successful employee. Paraquad works closely with participants involved in the program to develop a plan to meet each individual's goals and needs.

**Home Care & Attendant Services** – This program is a consumer-directed Medicaid based program that provides personal care attendant (PCA) services to individuals with significant disabilities, enabling them to live independently.

**Housing Assistance** – This program assists individuals with disabilities in finding accessible, affordable housing in the St. Louis area. Paraquad provides financial assistance for home modifications, rental and mortgage payments. In addition to advocating for increased accessible, affordable housing, Paraquad works with architects, developers, landlords, and community leaders to promote the expansion of housing choices for people with disabilities.

**Transition Services** – This program assists individuals with significant disabilities transitioning from nursing homes, shelters, or rehabilitation centers into the community. Each participant works with an Independent Living Specialist (ILS) to learn skills that will enable them to live independently. The transition process can take anywhere from six months to two years through a process that provides a holistic approach to assisting people who are in nursing homes, homeless or those trying to avoid homelessness.

**Youth and Family Services** – This program combines youth development principles with the spirit of the independent living philosophy to address the unique challenges facing children and youth with disabilities. The program engages youth in safe and nurturing activities that are key components of positive youth development.

**Wheelchair & Equipment Services** – The wheelchair repair program provides timely and affordable repair services for wheelchairs and other assistive devices. The reutilization program accepts donated durable medical equipment, sanitizes, repairs and distributes pre-owned assistive technology devices at low cost.

#### **IV. ORGANIZATIONAL STRENGTHS**

**Staff Professional Development:** Paraquad provides ongoing staff development regarding CIL policy, requiring staff to complete training in one of three areas each quarter in the area of enrichment, independent living philosophy, and advocacy. These requirements are in addition to the required annual training on the Health Insurance Portability and Accountability Act of 1996 among other requirements to maintain accreditation from the Commission on Accreditation of Rehabilitation Facilities International. Center staff expressed appreciation for the opportunity to not only enhance their abilities to better serve consumers, but also to match the staff person's interest and long-term career goals.

**Peer Mentoring Program:** Consumers and volunteer peer mentors reported that the peer mentoring and counseling services are high quality due to the commitment of the volunteers and their professionalism. In order to establish a respectful, supportive network of peers, the Peer Consultant Coordinator identifies potential volunteers from current consumers and/or community members to serve as peer mentors. Perspective mentoring volunteers complete a peer mentoring application form in addition to the Paraquad volunteer application form. To enhance volunteer engagement, peer support volunteers are required to sign a letter of commitment once accepted into the program. After six months of service, their performance is evaluated by the Peer Consultant Coordinator. Volunteers may then be eligible for reimbursement for travel and incidentals based on their performance. Some volunteers have secured part-time or full-time employment at the Center as a result of their volunteering. For example, the Peer Consultant Coordinator is a former consumer of the CIL and former volunteer peer mentor;

**Community Outreach:** The longevity of the staff is a significant factor in the center's success because staff has become ardent advocates and representatives of the center. The CIL's creative outreach and well publicized history has increased brand name recognition of Paraquad in the community. For example, the formation of the AccessibleSTL awards, which highlights the efforts of those whose actions and policies exemplify the goals of promoting a fully accessible

St. Louis community for people with disabilities and everyone. AccessibleSTL recipients not only lead the way to a more accessible St. Louis, but also serve as Paraquad ambassadors.

## **V. OBSERVATION AND RECOMMENDATION**

During its review activities, RSA identified the observation below and made a recommendation that Paraquad may consider to improve its overall operations and IL service delivery to consumers with significant disabilities.

### **1. Purchasing Policy**

**Observation:** Paraquad has policies and procedures for purchasing. There are two signatures needed on checks over \$5,000. The three staff members authorized to sign checks include the executive director, chief financial officer, and the chief operations officer. While the board is involved in the budgeting process, the board does not sign checks or approve purchases as the only purchases made are made with budgeted funds.

**Recommendation:** RSA recommends that the board consider revising policies and procedures to include the board of directors or the chairperson to ensure that the board is aware of expenditures as they occur. Given that the current long-serving executive director will retire next year, it may be helpful to ensure separation of duties and board involvement. In recent years, several CIL executive directors and/or their staff have been alleged to have embezzled funds without board knowledge. In all cases, the board of directors had not exercised its authority in overseeing financial management.

**Paraquad Response:** Paraquad's board has been satisfied with the current internal control policies and both the Executive Committee and Finance Committee have been reluctant in the past to inject a volunteer into the management process, although they did agree to have the Treasurer do periodic review of certain journal entries. As a mitigating control, Paraquad will propose that the Treasurer review the monthly or quarterly Disbursement Register.