



CENTERS FOR INDEPENDENT LIVING

COMPLIANCE REVIEW REPORT

Granite State Independent Living (GSIL)

Grant #: H132A930026 (Concord: Main office)
H132A940023 (North Country: Littleton and Berlin offices)
H132A950016 (Statewide: Nashua and Manchester offices)
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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* (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 September 12 -16 2011. The program review covered the independent living (IL) operations and activities of Granite State Independent Living (GSIL), and 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), 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 Cotter, RSA IL program specialist;

- Yavonka Archaga, Executive Director, New Orleans Resources for Independent Living, non-federal reviewer, and;
- Erin Hall, SILC representative, NH SILC, observer.

III. MISSION AND DESCRIPTION

Founded in 1980, Granite State Independent Living (GSIL) is a statewide nonprofit organization that provides tools and services to individuals with disabilities so that they can navigate their own lives and participate as fully as possible in the community. GSIL's mission is to promote life with independence for people with disabilities and those experiencing the natural process of aging, through advocacy, information, education and support services.

GSIL has offices in Berlin, Concord, Dover, Keene, Littleton, Manchester, and Nashua, New Hampshire.

In addition to providing the four IL core services, GSIL is involved in 22 other programs and projects on behalf of individuals with disabilities, some of which are described below.

- **Access Modification Program** – This program assists with access issues by providing access evaluations and the construction of exterior ramps that meet all American with Disabilities Act (ADA) and Barrier Free Design Code (BFDC) regulations. This program also purchases and installs accessibility equipment such as lifts, durable medical equipment, vehicle modifications, and some communication technology.
- **Earn and Learn Program** – A partnership among GSIL, New Hampshire Vocational Rehabilitation (NHVR), and the Manchester School District, this program provides an academic, life skills and employment experience for Manchester high school students with disabilities who have dropped out of school or are at risk of dropping out of school.
- **Housing Program** – As a HUD-Approved Housing Counseling agency, GSIL offers a variety of information and education services to help students with disabilities meet their housing needs and financial goals. Services include, but are not limited to: financial wellness workshops, workplace and counseling.
- **Interpreter Referral Program** – Through this program, GSIL provides interpreter referral for American Sign Language interpreters as well as CART provider referrals.
- **Personal Care Services** – GSIL offers three personal care service programs: Personal Care Attendant Program (PCA), Personal Care Services Program (PCSP), and Independent Care Options (ICO). Each has different eligibility requirements and separate, non Part C, funding streams (e.g. Medicaid, home and community-based waiver).
- **Spinal Cord Injury Association Chapter** – The New Hampshire Chapter of the National Spinal Cord Injury Association is a program of GSIL that provides service to those individuals with spinal cord injury and disease, their families and the community. Services include resource location, support, education, awareness, and

advocacy; as well as working cooperatively with disability organizations and health facilities.

- **Transportation** – Operating with its own fleet of accessible vehicles and maintaining relationships with other accessible transportation providers throughout the state, GSIL provides transportation throughout the state or subcontracts with other providers as appropriate. Transportation service options include: Medicaid - Non-Emergency Medical Transportation (NEMT), Wheelchair-accessible transportation, and the Transportation Reimbursement Program (TRP). Given that many individuals with disabilities are ineligible for some of these programs, GSIL continues to advocate at a number of different levels to increase the availability of public and private accessible transportation options throughout the state.

IV. ORGANIZATIONAL STRENGTHS

Data Management – GSIL hired a software engineer who created a database tailored to capture GSIL’s financial, demographic, and services data for the RSA-704 Part II Report. The system, which was created in place of C-FAL, is called the “Darn Accurate Counting System” (DACS). IL Service Coordinators maintain hard copies of CSRs and update service notes as appropriate. One FTE devotes part of her time to data entry to assist IL Services Coordinators (ILSC) to enter data into DACS. Orientation and ongoing training are provided to employees. Managers use DACS to ensure that IL service the staff are entering data and service notes on a routine basis for CSRs. Additionally, the staff that use the DACS reported that they have the opportunity to provide feedback to the software engineer and that updates to DACS are ongoing to meet the needs of staff and quality assessment. Consumers, donors, and community partners/stakeholders are entered into DACS with the ability to view connections among these parties, consistent with CIL policies and procedures, including the confidentiality agreement.

Youth Transition – As noted above, the Earn and Learn program stemmed from an effort to re-engage students with disabilities who had dropped out of or were at risk of dropping out of school. A partnership with NHVR, the Manchester School District, GSIL, and other community-based organizations, such as local colleges and post-secondary institutions to enable students to acquire knowledge and skills through instruction outside the traditional classroom methods. These include: apprentices, community service, independent study, internships, online courses, performing groups, private instruction, and peer mentoring. GSIL is involved in the students’ IEPs and transition plans. Students learn from the choices they make, mastery experiences, social modeling, social persuasion, psychological responses, and psychological responses, among other self-efficacy influences. Created with funds under the *American Recovery and Reinvestment Act of 2009*, Earn and Learn has garnered continued funding from NHVR. As of September 2011, Earn and Learn has made possible the high school graduation of 22 students; engaged 79 dropped out/at risk students, 55 of whom are active; created 52 work experiences for students; supported four students who went from their internships to employment; and placed 11 students in career jobs.

V. OBSERVATIONS AND RECOMMENDATIONS

During its review activities, RSA identified the observation below and made a recommendation that GSL may consider. In addition, the completed ORG is attached to the report.

1. Information and Referral Services Data

Observation: The number of information and referral (I&R) requests appears lower than what the staff described they actually provide and consumers reported they receive.

- The GSIL Information and Referral Services Assistant I, who has an Information and Referral Services certification from the Alliance of Information and Referral Systems (AIRS), strives to establish a respectful, short-term relationship with inquirers that is not as in-depth as one that may be developed as part of Independent Living Services Coordination nor require the creation of a CSR. This assistant's I&R data appear in the RSA-704 Part II.
- Interviews with GSIL staff and consumers and a review of the job descriptions of the ILSC who provide the four core services revealed that almost all of the coordinators and the receptionists provide I&R services, as described in the RSA-704 Part II instructions:
Section A, Individual Services, *Information and Referral Services* "This is the only service (other than services to family members) that may be provided to all individuals, whether or not the individual has a disability. Some entities record this service using strokes on an answering pad without opening a CSR; others create a CSR or other such file for future contact and outreach."
- While GSIL is providing I&R services, not all staff record their I&Rs in the DACS. A random review of CSR records revealed that while almost all service staff provide I&R services, the majority of referrals are made to another GSIL-supported program. For example, in discussions with staff and consumers, the majority of the consumers were referred by an ILSC to another GSIL program (i.e. AMP, employment services, housing, or transportation). In most cases, the CSRs were a direct result of GSIL staff providing a service through one of GSIL's programs. Public calls to the center in which a receptionist may provide generic information and referral are not captured. It appears that the center is providing more I&Rs than reported.
- In conversations with the software engineer and other GSIL staff, they indicated they will look into upgrading the DACS to track I&Rs of all staff, not just the personal, more in-depth I&Rs conducted by the Information and Referral Services Assistant I.

Recommendation: RSA recommends that all staff, including receptionists, in addition to the I&R Service Assistant, maintain at least a list of the number of information and referrals provided and that the CIL develop a process by which these data can be tracked.

GSIL Response: GSIL thanks RSA for its recommendation and agrees that not all of the work around I&R is currently being captured. We have already implemented solutions such as an I&R referral and I&R stats report in DACS in order to better capture a more

accurate reflection around the work we do with I&R. We are confident that the work that has already begun to address this will be reflected in the FY11 704 report.

RSA Response: RSA appreciates the Center's efforts to better capture I&R services. We look forward to offering technical assistance, as needed.