



CENTERS FOR INDEPENDENT LIVING

**COMPLIANCE REVIEW REPORT**

New Vistas

GRANT # H132A930054

**REVIEW DATES:** March 28 - March 30, 2011

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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 from March 28-30, 2011. The program review covered the independent living (IL) operations and activities of the New Vistas Center for Independent Living (NV), 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), and other documents that verified compliance with standards and indicators. Thirty CSRs were randomly selected for review. 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:

- Sean Barrett, RSA program specialist;
- Dean Nielson, nonfederal reviewer; and
- Lorie Pacheco, representative, designated state unit (New Mexico Department of Vocational Rehabilitation).

- Suzanne Ruble, chair, New Mexico Statewide Independent Living Council

### III. MISSION AND DESCRIPTION

New Vistas (NV) promotes independence and self-reliance through a variety of community-based services for persons with disabilities and children with special needs and their families.

NV has offices in Rio Arriba, Taos, Colfax, Union, Mora, Harding, Los Alamos, Santa Fe and San Miguel counties, although programs funded through Title VII, Part C funds are based in Santa Fe.

In addition to providing the four IL core services, NV provides extensive early childhood services, assistive technology services, adaptive equipment services, audiological services, family education, counseling and home visits including infant mental health, health services (to enable the child to benefit from other early intervention services), medical services (for diagnostic and evaluation purposes), nutrition services, occupational therapy and other health/physical restoration services.

### IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

Staff Retention: NV maintains 32.31 FTEs, with an estimated time spent with the center of 15 years. Upper management retention is higher, averaging 18 years with the center.

Staff turnover in non-profits is generally high. The review team had discussions with staff about the factors that contributed to the high retention rate at NV as well as how the center has benefited from retaining staff. These factors and benefits are described below.

- **Compensation:** Board of Directors and management have made a commitment to paying wages comparable to other non-profits in the geographic area. This commitment is part of center planning and plays a significant role in determining whether a potential funding source is appropriate NV to pursue.
- **Cross-Training:** High levels of retention have allowed sufficient time for staff to become proficient in conducting duties beyond their assigned duties. The result is that all key functions of NV can be accomplished by more than one person; thus, strengthening the depth of skills and expertise within the organization and providing adequate coverage for functions at all time, including during staff absences. For example, when staff experience personal issues, such as personal or family illness, other staff provide coverage. The consensus among staff is that this practice allows them maximum flexibility in dealing with personal issues and at the same time provides the assurance that the job duties are being performed.
- **Staff Development:** Staff are encouraged and supported to engage in professional development activities. Staff cited examples of new skills they had gained since joining NV that both enhanced their job satisfaction and made them more effective employees.

Logic Model: NV maintains a comprehensive logic model that is specific to the center and acts as a guide in evaluating opportunities to expand services. The model takes into account NV's priorities and capacities as well as community expectations and capacities. The model is reviewed at least annually and altered if realities have changed. Leadership reports that the

logic model has been useful as a filter to determine if potential actions are within the center's capacity and mission. All levels of management report the logic model has assisted NV in making decisions about opportunities it should pursue based on its mission and capacity as well as opportunities that are inappropriate.

Resource Development: NV's IL Part C grant represents approximately 10 percent of its total budget of \$3,022,719 and demonstrates the benefits of effective resource development. Other sources include state funding, including funding from the New Mexico Departments of Health, Vocational Rehabilitation and Department of Human Services, as well as funds generated from fee-for-services activities.

## **V. OBSERVATIONS AND RECOMMENDATIONS**

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

### **1. CSR Forms**

**Observation:** CSR goal documentation consists predominately of a one page goal form with the top half including space for all goals while the bottom is used for evaluation of goals. The combination of all goals into one "box" often resulted in multiple goals being combined into one compound goal.

**Recommendation:** RSA recommends revising the goal form to include distinct areas for distinct goals and their evaluation (goal 1, goal 2, etc.) to provide more clarity for evaluation and tracking of goals.

### **NV Response:**

New Vistas Peer Support staff members will review the current goal documentation. Upon review of the Peer Support staff findings New Vistas Management staff members will take the Rehabilitation Services Administration's cite review recommendation under advisement.