



CENTERS FOR INDEPENDENT LIVING

COMPLIANCE REVIEW REPORT

Roads to Freedom Center for Independent Living of North Central
Pennsylvania (CILNCPA)

GRANT # H132A980841

REVIEW DATES: January 23-25, 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* (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 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 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 January 23-25, 2012. The program review covered the independent living (IL) operations and activities of CILNCP, 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 Cotter, RSA IL program specialist;

- Yonette Douglas, Co- Director, Harlem Independent Living Center (HILC), non-federal reviewer;
- Beverly Sisko, representative, Pennsylvania Office of Vocational Rehabilitation (POVR), as an observer, and;
- Zainaib “Z” Jama, representative, Pennsylvania Statewide Independent Living Council, as an observer.

III. MISSION AND DESCRIPTION

The Roads to Freedom Center for Independent Living of North Central Pennsylvania (CILNCP) began serving individuals with disabilities as a satellite office of the Center for Independent Living of Central Pennsylvania, located in Camp Hill, PA. In 1998, RSA awarded CILNCP a Part C Center for Independent Living grant. CILNCP’s mission is to empower people with all disabilities by providing resources, options, and disability-related services needed to obtain individual freedom in their lives.

CILNCP has an office in Williamsport, PA in a building that formerly housed a furniture supply store. The building, which is ADA compliant, has ample space for peer support groups, volunteers, and community group meetings, and affords consumers confidentiality while receiving services.

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

- **Assistive Technology Services** – Funded through Pennsylvania’s Initiative on Assistive Technology, this program offers a wide selection of devices that can help with communication, daily living, hearing, reading, visual impairments and many other activities of everyday life, enabling consumers to borrow equipment for a limited time (typically 2-8 weeks) to be sure it meets their needs at home, on the job, at school, or in the community.
- **ADA Consultation Services**– CILNCP provides sponsored/co-sponsored trainings to the public on general topics related to the Americans with Disabilities Act (ADA), as amended. As part of this project, funded through the Mid-Atlantic Disability and Business Technical Assistance Center, CILNCP identifies hospitality entities in the state for outreach and conducts customer service and ADA trainings.
- **Autism Spectrum Disorder, (ASD) Waiver** – These services include services that will help a person improve his or her activities of daily living (ADLs), such as bathing, dressing, and eating, or doing housework, managing money, and cooking. This service also includes teaching and improving skills that will help consumers to be active in their community, including socializing, getting to know the neighborhood, or participating in community activities such as hobbies, shopping or attending an event.
- **The Deaf and Hard of Hearing Services** – This program offers resources/training related to language translation, housing, income benefits, mobility/transportation, education, communication, assistive technology, advocacy, budgeting, household

management, mentoring, and socialization/recreation geared toward persons who are deaf or hard of hearing.

- **Independent Monitoring for Quality (IM4Q)** – The primary purpose of this program is to encourage continuous improvements in the quality of services provided to Pennsylvania’s Consumers of Mental Retardation Programs. Independent monitors visit selected consumers who have used mental retardation services funded by the Clinton, Columbia, Lycoming, Montour, Snyder, Tioga or Union County MH/MR programs and conduct extensive and ongoing surveys surrounding their satisfaction with the services that have been provided to them. The goals of IM4Q are to promote self-awareness and self-advocacy in consumers, educate consumers about Pennsylvania’s Self-determination Initiative, provide information about the satisfaction of people served by the Mental Retardation System, and provide a positive environment among consumers, their families, and MR providers that will identify strengths and weaknesses in the Mental Retardation System and will encourage systems change.

IV. ORGANIZATIONAL STRENGTHS

Organizational Structure and Internal Controls – Since RSA’s June 2008 on-site review of CILNCP, the center implemented its corrective action plan (CAP), establishing policies and procedures and formal processes, creating a mature, professional work environment that appears to provide appropriate services while properly accounting for funds. CILNCP staff participated in a statewide training, “Financial Management Guidelines and Regulations for Statewide Independent Living Councils,” conducted by ILRU on financial management, including how roles and responsibilities of SILCs differ from CILs. Additionally, the center received strategic planning training.

CIL to CIL Peer Mentoring – As part of the Association of Programs for Rural Independent Living for CIL to CIL Peer Mentoring program, the Arizona Bridges to Independent Living (ABIL) staff members visited CILNCP to provide technical assistance on the development of their peer mentor program, their development and use of peer support and IL groups, and the development of their volunteer program.

Volunteers Program – As a direct result of the above-mentioned CIL to CIL Peer Mentoring, CILNCP utilizes former consumers, their family members, and/or community stakeholders to serve as volunteers throughout the CIL. The CIL incorporated volunteers into the CIL office/fiscal procedures, provided training to volunteers, and documented their hours and activities.

Board Members’ Experience – The current board members have a wide range of experience, ranging from banking to public transit, to participation in national disability organizations, offering their expertise to oversee the administration of the CIL and help to enhance CIL’s effectiveness in providing appropriate services to consumers.

V. OBSERVATIONS AND RECOMMENDATIONS

During its review activities, RSA identified the observations below and made recommendations that CILNCP may consider. In addition, the completed ORG is attached to the report.

1. Suggestion Box

Observation: A majority of staff at the center reported that they felt comfortable expressing concerns and/or making suggestions to their direct supervisors. Overall, staff indicated that management was receptive to receiving feedback and staff input on programs and policies that directly impacted the consumers served. The majority of staff reported that they understood the CIL grievance policy but had not needed to use it. RSA is aware of one current staff member who has complained to former CIL staff resulting in emails to RSA rather than utilizing the CIL grievance policy and procedures to resolve an issue. Staff indicated that the CIL has discontinued the use of suggestion boxes and would benefit from restoring them.

Recommendation: RSA recommends that CILNCP return the suggestion boxes to highly trafficked areas of the CIL so that all staff and volunteers may provide confidential feedback and suggestions.

CILNCP Response: CILNCP has returned the suggestion boxes as of January 30th, 2012 to the lounge which is a highly trafficked area of the CIL so that all staff and volunteers may provide confidential feedback and suggestions.