



CENTERS FOR INDEPENDENT LIVING  
COMPLIANCE REVIEW REPORT

Training, Advocacy, Referral, & Peer Support (TARP)

Center for Independent Living

Grant Award Number: H400A100377

Paris, Tennessee

**REVIEW DATES:**

Draft Report: March 27, 2013  
CIL Response: Due April 27, 2013  
Final Report: Due May 27, 2013

**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. 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 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 Training, Advocacy, Referral, & Peer Support (TARP) on-site review was conducted February 5-7, 2013, in Paris, Tennessee. The program review covered the independent living (IL) operations and activities of TARP 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, volunteers, and members of the board of directors. In addition to the interviews, program, personnel, 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:

- Deborah Cotter, RSA program specialist;

- Robert Cox, nonfederal reviewer;
- Samuel Cole, representative, designated state unit; and
- Mark Montgomery, representative, Tennessee Statewide Independent Living Council.

### III. MISSION AND DESCRIPTION

TARP's mission is to empower people with disabilities to live independently. TARP's goals are to enable people with disabilities to take full advantage of community resources, enhance their opportunities, and determine the direction of their own lives. The Center serves Benton, Dickson, Henry, Huston, Humphreys, Montgomery, Stewart, and Weakley counties in western Tennessee. TARP was originally established in 2005 with Part B funds. TARP was first awarded an RSA grant under Title VII, Chapter 1, Part C, of the *Rehabilitation Act of 1973, as amended*, in 2010 as part of the *American Recovery and Reinvestment Act (ARRA) of 2009*.

In addition to the four core services, TARP is involved in the following projects on behalf of individuals with significant disabilities.

- **Equipment Exchange:** The TARP Durable Medical Equipment Exchange Program enables individuals with disabilities and their families to become self-sufficient. Equipment donated to TARP is collected, modified, and/or repaired, and provided to individuals in need. As a result, people with disabilities in West and Middle Tennessee to move out of costly nursing facilities and into their communities. Through collaboration with Community Action Network, and the Housing Communities, Inc., TARP is better able to reach those most in need of IL skills equipment (e.g., toileting equipment)
- **Tutoring Program:** The TARP Administrative Assistant provides one-on-one tutoring for students who have aged out of Special Education, but may not have earned a General Education Degree (G.E.D.) due to low math and/or reading skills. As a result of these one-on-one math and reading tutoring sessions, consumers and their family members reported increased test scores in reading and math, in addition to enhanced socialization skills.

### IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

The following are practices that are practices that have proven useful in the administration of this Center:

- **Active and Engaged Board of Directors-** Board members volunteer and conduct community outreach in coordination with CIL staff and volunteers. In particular, the TARP Board Treasurer works closely with Assistant Director to oversee finances. The Treasurer serves on other nonprofit boards, which has enhanced her understanding of her responsibilities as a Board member. As a result, the TARP Board appears to have sound fiscal planning, and fiscal and programmatic oversight of the Center.
- **Staff Cross-training and ILS General Procedures Manual-** CIL staff members are cross-trained to ensure that any staff member may serve consumers if/when an IL Specialist is out of the office. The ILS General Procedures Manual provides specific instructions for staff to conduct intake, provide services, and document the provision of

services. As a result, consumers reported receiving quality services from staff and that all staff were available to address questions or concerns regardless of whomever was on duty.

- **Professional Development-** TARP staff reported that the CIL management and Board members encourage training above and beyond the required trainings. As a result, staff reported being better prepared to work with consumers with mental health issues, for example, because staff had learned how to identify triggers, in talking with consumers, they were able to identify ways to diffuse problems and/or behavioral issues. Further, after Board and staff members participate in trainings they train other Board and staff members who were unable to participate in the training. As a result, the CIL not only saves money by sending fewer people to trainings, but also shares the knowledge base with all Board and staff members.

## **V. OBSERVATIONS AND RECOMMENDATIONS**

During its review activities, RSA identified the observations below and made recommendations that TARP may consider to improve its overall operations and IL service delivery to consumers with significant disabilities.

### **1. Resource Development**

**Observation:** Although TARP has conducted resource development, meeting the statutory and regulatory requirements, the Center relies primarily on the Part C award to provide services. Staff and Board members reported that having started the CIL with few funds in 2005, they are able to garner what consumers need and use funds efficiently. In other words, having lived through leaner times, the CIL staff and Board members reported that they were able to provide services and assist consumers with its current Part C award and the small grant from Helping Hands. Further, staff and Board members reported that they leave, for example, ramp building and other direct services that require additional certification and expertise, to the another nonprofit group that has qualified contractors build ramps. Offering such services would duplicate efforts and reduce CIL resources.

**Recommendation:** RSA recommends that the board consider diversifying its funding sources and reaching out to nontraditional partners in Tennessee and beyond, to enhance services to consumers, for example, by hiring additional IL Specialists.

**TARP Response:**

### **2. Conflict of Interest**

**Observation:** TARP is meeting the legal requirement at EDGAR 75.525, Conflict of Interest, and has a conflict of interest policy in place. However, at one point the Executive Director and Assistant Director were previously married to each other. During the course of the review, there were individuals who expressed concerns to the review team that there is the appearance of a conflict of interest in that the Executive Director directly supervises, evaluate the performance and compensation of the Assistant Director.

**Recommendation:** RSA recommends that TARP safeguard against the appearance of and potential for conflicts of interest in its staff assignment practices by:

- reevaluating and implementing conflict of interest policies and procedures addressing potential conflicts of interest, including current and former family members involved in staff hiring, supervision, performance evaluations and compensation;
- reestablishing regular board evaluations of the executive director's job performance, including reviewing provisions for staff recusal in the case of current and former family members who are subordinates, and;
- reevaluating and establishing the CIL's hiring policies and procedures to ensure the recruitment of the most qualified IL staff available, including public job opening announcements and impartial job applications review processes.

### **TARP Response**

## **VI. FINDINGS AND CORRECTIVE ACTIONS**

RSA did not identify any findings.

# **UNITED STATES DEPARTMENT OF EDUCATION**

## **OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES**

### **REHABILITATION SERVICES ADMINISTRATION**

Washington, D.C. 20202-2800

#### **Center for Independent Living (CIL)**

#### **On-Site Review Instrument**

Fiscal Year: 2013

Name of Grantee: Training, Advocacy, Referral, & Peer Support (TARP) Center for Independent Living

Grant #: H400A100377

State: Tennessee

*Rehabilitation Act of 1973, as amended  
Title VII, Chapter I, Sections 706 and 722 – CIL Program*

# Part I

## STANDARDS, INDICATORS AND ASSURANCES FOR CILS

The following questions are based on the CIL standards, indicators and assurances as required in Title VII of the Rehabilitation Act and the corresponding regulations. Unless otherwise noted, a “no” response indicates that the CIL did not demonstrate minimum compliance with the corresponding standard, indicator or assurance. A “no” response will be the basis for a corresponding finding in the report. The term *recommended practice* denotes a practice that, although not explicitly required by federal law or regulations, would, if followed, further the purpose of the independent living (IL) program.

### **I. Grantee is an Eligible Agency**

#### **Section 725(c)(1) of the Rehabilitation Act; 34 CFR 364.4(b)**

Yes The CIL meets the definition of eligible agency as defined in the statute and regulations.

Verification Source: IRS 990; articles of incorporation; interviews with consumers, board, and staff, review of documents; observation by review team; and 704 Report data and consumer service records

### **II. Standards and Indicators**

#### **Section 725(b) and (c)(3) of the Rehabilitation Act; 34 CFR Part 366, Subpart G; 704 Report, Part II**

The purpose of this subpart is to measure the extent to which the CIL is in compliance with the standards and assurances in Section 725(b) and (c) of the act.

#### **Compliance Indicator I – Philosophy**

##### **Section 725(b)(1) of the Rehabilitation Act; 34 CFR 366.63(a)**

#### **Consumer Control**

##### **Sections 702(2), 725(b)(1)(A) and 725(c)(2) of the Rehabilitation Act; 34 CFR 366.63(a)(1)**

#### **(a) Governing Board**

##### **Sections 725(b)(1)(A) and 725(c)(2) of the Rehabilitation Act; 34 CFR 366.50(b) and 366.63(a)(1)(i)(A)**

Verification of Consumer Control

7 Number of persons on the governing board.

5 Number of governing board members with significant disabilities.

Yes Is line (ii) over 50 percent of line (i)?

Recommended Practice:

0 Number of members from minority groups on the governing board.

Verification that the CIL Board is the Principal Decision-Making Body: The CIL board is the principal governing body of the CIL, as evidenced, for example, by its bylaws, policies and procedures, and other practices ensuring that policy decisions are vested with the governing body.

Recommended Practices:

Yes The CIL has policies and procedures specifying board members’ roles and responsibilities.

No The CIL has a written process for identifying and recruiting board members.

Verification Sources for Governing board: bylaws, policies and procedures, and interviews with the Board and Management staff.

**(b) CIL Employees**

**Sections 725(b)(1)(A) and 725(c)(6) of the act; 34 CFR 366.63(a)(1)(i)(B)**

<u>CIL Employees</u>	<u>Total Persons</u>	<u>Persons with Disabilities</u>
Decision-making positions	<u>2</u>	<u>2</u>
Other staff positions	<u>2</u>	<u>2</u>

Yes Over 50 percent of the CIL’s employees in decision-making positions are filled by individuals with disabilities.

Yes Over 50 percent of staff positions are filled by individuals with disabilities.

Recommended Practice:

0 Number of minority<sup>1</sup> employees (decision-making and other staff positions)

Verification Sources for CIL Employees: Staff roster, interviews with staff, and observation by review team.

**Self-help and Self-advocacy**

**Section 725(b)(1)(B) of the Rehabilitation Act; 34 CFR 366.63(a)(2)**

Yes The CIL promotes self-help and self-advocacy among individuals with significant disabilities.

<sup>1</sup> In this instance, “minority” refers to members of racial or ethnic groups that have been traditionally underrepresented.

Verification Sources for Self-help and Self-advocacy: Interviews with consumers, Board, staff, and community stakeholders.

### **Development of Peer Relationships and Peer Role Models**

#### **Section 725(b)(1)(C) of the Rehabilitation Act; 34 CFR 366.63(a)(3)**

Yes            The CIL promotes the development of peer relationships and peer role models among individuals with significant disabilities.

Verification Sources for Development of Peer Relationships and Peer Role Models: Interviews with consumers, board, and staff; and review of Consumer Service Records (CSRs).

### **Equal Access**

#### **Section 725(b)(1)(D) of the Rehabilitation Act; 34 CFR 364.23(b) and 366.63(a)(4)(5)**

Yes            Ensures equal access of individuals with significant disabilities, including communication and physical access, to the CIL's services, programs, activities, resources and facilities, whether publicly or privately funded.  
*Equal access, for purpose of this question, means that the same access is provided to any individual with a significant disability regardless of the individual's type of disability.*

Yes            Advocates for and conducts activities that promote the equal access to all services, programs, activities, resources and facilities in society, whether public or private, and regardless of funding source, for individuals with significant disabilities.  
*Equal access, for the purposes of this question, means that the same access provided to individuals without disabilities is provided in the center's service area to individuals with significant disabilities.*

Yes            To the maximum extent feasible, makes available personnel able to communicate with individuals with significant disabilities who rely on alternative modes of communication (manual communication, nonverbal communication, Braille, audiotapes, etc.) and who apply for or receive IL services.

Yes            To the maximum extent feasible, makes available personnel able to communicate in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services.

Yes            Makes available in alternate formats, as appropriate, all of its written policies, materials and IL services (e.g., Braille, large print, audio tape).

Yes            The CIL is physically accessible for individuals with significant disabilities, for example, individuals with mobility disabilities (e.g., signage, doors, bathrooms, parking lots) or individuals with Environmental Illness and Multiple Chemical Sensitivity (e.g., no-fragrance policy or use of "green" cleaners).

Yes            The CIL ensures communication access for individuals with significant disabilities by using, for example, TDDs/TTYs for individuals with hearing disabilities or picture boards and/or other means of communication for individuals with cognitive disabilities.

Types of reasonable accommodation:	Full-time	Part-time	Upon Request
Interpreters are available at the CIL.	_____	_____	<u>  X  </u>
Readers are available at the CIL.	_____	_____	<u>  X  </u>
Personal attendants are available at the CIL.	_____	_____	<u>  X  </u>

Verification Sources for Equal Access: Interviews with consumers, Board, and staff; review of documents; and observation by review team.

**Compliance Indicator 2- Provision of Services on a Cross- Disability Basis  
Section 725(b)(2) of the Rehabilitation Act; 34 CFR 366.63(b)**

Yes            Provides IL services to eligible individuals or groups of individuals without restrictions based on the particular type or types of significant disability of an individual or groups of individuals, unless the restricted IL service (other than the IL core services) is unique to the significant disability of the individuals to be served, e.g., Braille instruction for persons who are blind.

Yes            Provides IL core services to individuals with significant disabilities in a manner that is neither targeted nor limited to a particular type of significant disability.

Yes            Provides IL services to individuals with a diversity of significant disabilities and individuals who are members of populations that are unserved or underserved by programs under Title VII of the act.

Verification Sources for Provision of Services on a Cross-Disability Basis: 704 Report data, and observation by review team; interviews with consumers, board, and staff.

**Compliance indicator 3 – Independent Living Goals  
Section 725(b)(3) of the Rehabilitation Act; 34 CFR 366.63(c); 34 CFR 364.52; 34 CFR 364.53**

Yes            The CIL maintains a consumer service record (CSR) for each consumer.

The CSRs contain:

Yes            Documentation showing that the individuals are eligible or ineligible for services (only those eligible are served).

- Yes            Written Independent Living Plans (ILPs) or written waivers from the consumers stating that ILPs are unnecessary.
- Yes            Information on the services requested by, and the services provided to, or arranged for, the consumers.
- Yes            The IL goals or objectives established with the consumers, whether or not in the ILPs.
- Yes            The goals or objectives the consumers believe they have achieved.

The CIL maintains documentation on:

- Yes            CIL notification to consumers of their right to develop, or waive the development, of an ILP.
- Yes            The number of ILPs developed by consumers receiving services from the CIL.
- Yes            The number of waivers signed by consumers receiving services from the CIL stating that an ILP is unnecessary.
- Yes            The CIL's facilitation of the development and achievement of IL goals selected by individuals with significant disabilities who request assistance from the CIL.
- Yes            The CIL's provision of opportunities for consumers to express satisfaction or dissatisfaction with the CIL's services and policies and documentation the CIL sends any results to its governing board and the appropriate SILC.

The ILPs:

- Yes            Indicate the goals or objectives established, the services to be provided and the anticipated duration of the services.
- Yes            Are developed jointly and signed by the appropriate CIL staff member and the individual with a significant disability/legally authorized representative.
- Yes            Are provided in accessible formats, as needed.
- Yes            Are reviewed at least annually to determine whether services should be continued, modified or discontinued and/or whether the individual should be referred to another program, including VR, developmental disability or special education individualized plans as appropriated.

Recommended Practice:

- Yes            The CIL has written CSR management policies and procedures.

Verification Sources for Independent Living Goals: Review of CSRs, comparison with electronic database, and interviews with staff.

**Compliance Indicator 4 – Community Options and Community Capacity  
Section 725(b)(4), (6), and (c)(10) of the Rehabilitation Act; 34 CFR 366.63(d)**

The CIL performed at least one activity in each of the following categories during the reporting year: FY 2011

- Yes            Community advocacy.
- Yes            Technical assistance to the community on making services, programs, activities, resources and facilities in society accessible to individuals with significant disabilities.
- Yes            Public information and education.
- Yes            Aggressive outreach to populations of individuals with significant disabilities that are unserved or underserved by programs under Title VII of the act in the CIL's service area.
- Yes            Collaboration with service providers, other agencies, and organizations that could assist in improving opportunities for individuals with significant disabilities to avail themselves of the services, programs, activities, resources and facilities in the CIL's service area.
- Yes            Did the CIL's outreach to unserved or underserved populations include minority groups and urban and rural populations?

Verification Sources for Community Options and Community Capacity: interviews with consumers, board, staff, and stakeholders; review of outreach materials, including Web site and brochures; and review of CSRs.

**Compliance indicator 5 – IL Core Services and Other IL Services  
Section 725(b)(5) of the Rehabilitation Act; 34 CFR 366.63(e); 34 CFR 364.51(b)(2)(iii); 34 CFR 364.58**

- Yes            The CIL provides information and referral services to all individuals who request this type of assistance from the CIL in accessible formats.

The CIL provides the following services in response to requests from individuals with significant disabilities who are eligible for IL services:

- Yes            Independent living skills training.
- Yes            Peer counseling (including cross-disability peer counseling).
- Yes            Individual and systems advocacy.

Yes A combination, as appropriate, of any two or more of the IL services defined in Section 7(18)(B) of the act.

The CIL maintains documentation regarding notification of applicants and consumers about:

Yes Policies and procedures, including accessible formats, to obtain review of decisions made by the CIL concerning requests for/provision of IL services.

Yes The availability of the Client Assistance Program (CAP) and how to contact the CAP, including accessible formats.

Verification Sources for IL Core Services and Other IL Services: Interviews with consumers, board, and staff, CIL brochures and Web site, and review of CSRs.

**Compliance indicator 6 – Resource Development  
Section 725(b)(7) of the Rehabilitation Act; 34 CFR 366.63(e)**

Yes The CIL during the reporting year conducted resource development activities to obtain funding from sources other than Chapter 1, Title VII, of the act.

Verification Sources for Resource Development Activities: Interviews with community stakeholders, board, and staff; and review of financial documents and contracts.

**III. Program and Financial Planning Objectives  
Section 725(c)(4) of the Rehabilitation Act; 34 CFR 366.50(d)**

Yes The CIL has established annual and three-year program and financial planning objectives.

Yes The objectives include the CIL's goals and mission.

Yes The CIL has a current work plan for achieving the goals or mission and has included specific activities to meet the requirements in the indicators.

Yes The work plan includes specific services, priorities and types of services to be provided.

Yes The objectives and work plan are consistent with the current SPIL.

Recommended Practices:

Yes The work plan includes objectives and goals for obtaining or increasing non-Title VII funding.

Yes The work plan addresses board, staff and/or volunteers training.

Verification Sources for Program and Financial Planning Objectives: Interviews with board, staff and review of documents.

**IV. 704 Report Accuracy and Documentation**  
**Section 725(b)(c) of the Rehabilitation Act; 34 CFR 366.50(h)(i)**

- Yes            The CIL has implemented internal controls and procedures (including quality assurance) to ensure 704 Report accuracy and documentation.
- Yes            Based on the CSRs, consumer lists, physical files and other documentation reviewed by RSA, the funding sources and amounts, CSR data (number of consumers, consumer demographics, ILPs and waivers, IL services and goals), standards and assurances compliance and other information in the most recent 704 Report are accurate and complete.

## Part II

### ORGANIZATION AND ADMINISTRATION OF THE CIL

#### V. Organizational and Personnel Practices

**Sections 704(m)(2) and 725(c)(5) of the Rehabilitation Act; 34 CFR 364.31; 34 CFR 366.50(e)**

Yes            The CIL uses sound organizational and personnel assignment practices (including organizational chart indicating lines of authority, job descriptions, performance appraisals).

Yes            The personnel practices include affirmative action to employ and advance in employment qualified individuals with significant disabilities.

Recommended Practice:

Yes            The CIL has personnel policies addressing such areas as wage and salary, fringe benefits, vacation and sick leave, etc.

Verification Sources for Organizational and Personnel Practices: Interviews with board, staff, and review of documents, including policies and procedures.

#### VI. Staff Development and Training

**Section 725(c)(11) of the Rehabilitation Act; 34 CFR 364.23(a); 34 CFR 364.24; 34 CFR 366.50(l)**

Yes            The CIL includes personnel who are specialists in the development and provision of IL services and in the development and support of centers.

Yes            The CIL has established and maintains a program of staff development for all classes of positions involved in providing IL services and, where appropriate, in administering the CIL program.

Yes            The staff development program is directed at improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

Yes            The staff receives training on how to serve unserved and underserved populations, including minority groups and urban and rural populations.

Recommended Practice:

Yes            The CIL has a governing board training and development program.

Verification Sources for Staff Development and Training: Interviews with Board and staff, and review of documents, such as personnel files.

**VII. Conflict of Interest**  
**EDGAR 34 CFR 75.525**

Yes            The CIL safeguards against a person (employee, board member, volunteer) to participate in an administrative decision regarding a project if the decision is likely to benefit that person or a member of his or her immediate family and that person is a public official or has a family or business relationship with the CIL.

Yes            The CIL safeguards against any person in the project to use his or her position for a purpose that is, or gives the appearance of being, motivated by a desire for a private financial gain for that person or for others.

Verification Sources for Conflict of Interest: Policies and procedures and interviews with Board and staff.

**VIII. Confidentiality**  
**34 CFR 364.56(a)**

Yes            The CIL has adopted and implemented policies and procedures to safeguard the confidentiality of all personal information, including photographs, publicity releases and lists of names that comply with 34 CFR 364.56(a) requirements including but not limited to:

Yes            protecting current and stored personal information.

Yes            informing IL applicants or consumers, authorized representatives, service providers and others, as appropriate, about the confidentiality of personal information and the conditions for gaining access to and releasing this information.

Recommended Practice:

Yes            The CIL has meeting space that ensures that consumers' confidentiality is protected when meeting with staff.

Verification Sources for Confidentiality: Interviews with consumers, staff, and board, and review of documents.

**IX. Drug-Free Workplace**  
**EDGAR 34 CFR 84.200 – 84.230**

- Yes The CIL conforms to the requirements of a drug-free workplace.
- Yes A statement is published notifying employees that the unlawful manufacture, distribution, dispensing, possession or use of controlled substances is prohibited at the CIL and specifying the action that will be taken against employees for violating the prohibition.
- Yes The CIL has established an ongoing drug-free awareness program.
- Yes Each grant-funded employee has been given a copy of the prohibition statement, including a notification that conditions of employment at the CIL require abiding by the statement and informing the director of the CIL of any convictions under a drug statute.
- N/A The CIL has taken appropriate personnel action against employees or has required employees to participate in drug abuse assistance program or rehabilitation program if such employees were convicted under a criminal drug statute conviction.

Verification Sources for Drug-Free Workplace: Interviews with Board and staff, and review of documents, including personnel files.

**X. Insurance Coverage**  
**EDGAR 34 CFR 74.31**

- Yes The CIL has insurance coverage for real property and equipment acquired with federal funds equivalent to that provided for property owned by the grantee.

Verification Sources for Insurance Coverage: Interviews with staff, and review of documents, including insurance policy.

**XI. Nondiscrimination**  
**EDGAR 34 CFR 75.500**

- Yes The CIL does not deny services to persons on the basis of their race, color, national origin, sex, age or the existence of a disability.

Verification Sources for Nondiscrimination: Interviews with consumers, Board, staff, and review of documents, including policies and procedures.

**XII. Prohibition Against Lobbying**

**EDGAR 34 CFR 82.100; 2 CFR 230, Attachment B, Item 25**

Yes            The CIL has on file a signed and dated copy of the Certification of Lobbying Form ED-80-0013 against using federal funds to influence or attempt to influence any federal agency or Congress through lobbying activities as described in 2 CFR 230, Attachment B, Item 25 and EDGAR 34 CFR 82.100.

Recommended Practice:

Yes            Incorporates provisions consistent with 2 CFR 230, Attachment B, Item 25 safeguarding against lobbying in its written policies and procedures.

## Part III

### GRANTS MANAGEMENT

#### XIII. Sources and Amounts of Funding (as verified by the review team)

(A) Title VII, Ch. 1, Part B	\$0
(B) Title VII, Ch. 1, Part C	\$200,000
(C) Title VII, Ch. 2	\$ 0
(D) Other Federal Funds	\$0
(E) State Government Funds	\$0
(F) Local Government Funds	\$0
(G) Foundations, Corporations, or Trust Grants	\$0
(H) Donations from Individuals	\$
(I) Membership Fees	\$0
(J) Investment Income/Endowment	\$0
(K) Fees for Service (program income, etc.)	\$ 0
(L) Other Resources (in-kind, fundraising, etc.)	\$6,414

#### Item 4 - Total Income

Total income = (A)+(B)+(C)+(D)+(E)+(F)+(G)+(H)+(I)+(J)+(K)+(L) \$ 206,414

#### Item 5 - Pass Through Funds

Amount of other government funds received as pass through funds to consumers (include funds received on behalf of consumers that are subsequently passed on to consumers, e.g., personal assistance services, representative payee funds, or Medicaid funds) \$0

#### Net Operating Resources

Total Income (Section 4) <minus> amount paid out to consumers (Section 5) =  
Net Operating Resources \$ 206,414

## **Grant Related Income**

### **34 CFR 364.6; EDGAR 34 CFR 74.2 and 74.24**

N/A If program income is generated with federal funds, such income is used for allowable and approved purposes.

Verification Sources for Grant Related Income: Interviews with staff and Board, and review of financial documents, including general ledger.

## **Budget**

### **EDGAR 34 CFR 74.21, 74.25, 75.702 and 75.730**

Yes Expenditures are recorded by budget cost category and funding sources.

Yes Procedures are followed to assure expenditures are consistent with the approved budget of the CIL.

Yes CIL requests prior RSA approval for budget and program plan revisions, when required under EDGAR 74.25.

Verification Sources for Budget: Review of financial documents, including ED-524, QuickBooks, Board meeting minutes, and interviews with board and staff.

## **XVI. Personnel Cost Allocation**

### **2 CFR 230, Attachment B, Item 8(m)(1)**

Yes Salaries and wages are charged based on documented payrolls approved by a responsible official.

Yes The distribution of salaries and wages are supported by personnel activity reports described in 2 CFR 230 Appendix B, Item 8(m)(2) and reflecting an after-the-fact determination of the actual activity of each employee.

Yes The CIL maintains reports reflecting the distribution of activity of all staff members whose compensation is charged to the award.

## **XVII. Fiscal Management**

### **EDGAR 34 CFR 74.21, 74.22, 74.52, 75.702, 75.707, 75.730; 2 CFR 230 Appendix A, Paragraph D**

The CIL's financial management systems provides for the following:

Yes Accurate, current, and complete disclosure of the financial results of each federally-sponsored project in accordance with the reporting requirements of the

SF-425 financial status report, including program income, federal and recipient shares of expenditures, indirect costs, etc.

- Yes        Records that identify adequately the source and application of funds for federally-sponsored activities.
- Yes        Effective control over and accountability for all funds, property and other assets in order to safeguard all assets and ensure they are used solely for authorized purposes.
- Yes        Comparison of outlays with budget amounts for each award.
- Yes        Written procedures that minimize the time between the transfer of funds and the disbursement of funds by the recipient.
- Yes        Written procedures for determining the reasonableness, allocability and allowability of costs.
- Yes        Accounting records, including cost-accounting records, supported by source documentation and entries are made on a timely basis.

Name/Title of person responsible for preparation of the SF-425: Beth James, Executive Director

- Yes        The CIL has an approved U.S. Department of Education cost allocation plan (CAP) or indirect cost rate.
- Yes        The CIL distributes administrative costs among its various funding sources in an equitable manner as described in the CIL's approved CAP or indirect cost rate.

Verification Sources for Fiscal Management: Interviews with Board Treasurer and staff, and confirmation of Cost Allocation Plan approval from Indirect Cost Group Director, U.S. Department of Education.

**XVIII. Accounting Systems**  
**EDGAR 34 CFR 74.21**

- Yes        The organization maintains a formal accounting system.

If the accounting system is computerized, identify the accounting program software used:  
Quick Books and contracted accountant.

The elements of the formal accounting system are (*check as appropriate*):

- General Ledger
- Grant Ledger
- General Journal

Cash Receipts

Describe other(s):

The formal accounting system is maintained by (*check as appropriate*):

Cash basis

Accrual basis

Describe other(s):

Verification Sources for Accounting Systems: Interviews with staff, review of financial documents, including bank statements and QuickBooks.

### **XIX. Travel Costs**

#### **EDGAR 34 CFR 74.27; 2 CFR 230, Attachment B, Item 51(b)**

Yes Travel costs incurred by employees and officers are reasonable and allowable, i.e., do not exceed charges allowed under the CIL's written travel policy or, in the absence of such a policy, as provided in 2 CFR 230, Attachment B, Item 51(b).

Yes Travel costs reimbursement requests for federal funds are justified and documented, e.g., through travel authorizations, receipts, etc, in accordance to the CIL's travel policy.

The policy provides for reimbursement by (*check as appropriate*):

(1) Actual expenses

(2) Per diem

Verification Sources for Travel Policies: Review of fiscal documentation and interviews with fiscal staff.

### **XX. Procurement**

#### **EDGAR 34 CFR 74.21 and 74.40 - 74.48**

Yes The CIL has written procurement procedures complying with EDGAR 34 CFR 74.44.

Yes The procurement procedures give adequate consideration to costs, quality, delivery, competitive bidding, inspection and acceptance, as well as reasonableness, allocability and allowability of costs.

Yes The procurement procedures address the 34 CFR 74.42 – 74.48 requirements including written contract award and administration code of conduct; open and free competitions; cost and price analysis; records and files; contractor conformance/performance.

- Yes            There is separation of responsibility for the authorization for purchasing and the subsequent payment. For example, payments are made only if disbursements or checks are countersigned.
- Yes            Payment vouchers are identified as to funding sources, expense classification and transaction date.

The executive staff/board approval is needed for items over: \$2,500

The person(s) responsible for purchasing equipment and supplies: Executive Director and Office Manager

Verification Sources for Purchasing: Review of policies and procedures and interviews with staff.

**XXI. Property**

**EDGAR 34 CFR 74.34(f) and (g), 74.44(a)**

- Yes            The CIL maintains current and complete records of all property purchased with grant funds.
- Yes            The CIL has a system for controlling inventory (general ledger control account, card reports, property labels).
- Yes            Maintenance of property and equipment records are kept.
- Yes            Records contain: description of each piece of equipment; purchase date/cost; manufacturer's serial number, model number, federal stock number, national stock number, or other ID number; source of equipment award number; where title vests; information from which federal participation can be calculated; location and condition of the equipment, date information was reported; and ultimate disposition
- Yes            The CIL inventories property at least once every two years.

Date of last inventory: within the last six month; inventory is continuous. Switched from manual to electronic database and conduct inventory annually. (VISTA volunteers enter into database.)

- Yes            Adjustments to inventory accounts are made only on written authority of a designated official.

Name/Title of designee: Bob Leonard, Executive Director.

- Yes            The CIL guards against loss, damage or theft of property.
- Yes            The CIL has policies, procedures and controls for purchasing and disposing of property.

Verification Sources for Property: Interviews with staff, review of insurance policy, and observation of security system by review team. Executive Director signs for items leaving inventory.

**XXII. Conferences and Meetings**

**2 CFR 230; Memorandum to Grantees Regarding the Use of Grant Funds for Conferences and Meetings, U.S. Department of Education, June 2012 (GAN Enclosure 7)**

Yes            The CIL ensures (e.g., through written policies or procedures) that, when hosting a conference or meeting, Part C or other federal funds are not used to purchase:  
-food for attendees unless doing so is necessary to accomplish legitimate meeting or conference business;\*  
-alcoholic beverages; or  
-entertainment (amusement, diversion, social activities, etc.)\*

\* This prohibition does not apply to social and recreational services described in 34 CFR 364.4 and related to IL goal(s) in a consumer’s CSR, such as peer support meetings.

**XXIII. Records Retention**

**34 CFR 364.53; EDGAR 34 CFR 74.53(b); EDGAR 34 CFR 75.730**

Yes            Financial, consumer records and other documentation are maintained and retained for a period of three years in accord with federal requirements.

Verification Sources for Records Retention: Interviews with staff and observation by review team.

**XXXIV. Audit**

**EDGAR 34 CFR 74.26**

No            The CIL expended \$500,000 or more in federal awards during the reporting year.

N/A          *If “Yes” above, an annual nonfederal audit including funds received under Title VII, Chapter 1 of the act has been conducted and a copy thereof submitted to the Federal Audit Clearinghouse, as required.*

Verification Sources for Audit: Interviews with staff and review of fiscal document.