



CENTERS FOR INDEPENDENT LIVING
COMPLIANCE REVIEW REPORT

Resource, Information, Support and Empowerment (RISE)

Grant Award Number: H132A960004

Beaumont, Texas

REVIEW DATES: June 3-5, 2013

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CIL Response: June 30th, 2013
Final Report: August 2, 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 on-site review of the Resource, Information, Support and Empowerment (RISE), located in Beaumont, Texas, was conducted from June 3-June 5, 2013. The program review covered the center's independent living (IL) operations and activities 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), and other documents that verified compliance with standards and indicators. CSRs were selected for review on a random basis. RSA 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:

- Elizabeth Akinola, RSA Independent Living Unit program specialist;

- Mitch Granger, nonfederal reviewer; and
- Regina Blythe, Texas Statewide Independent Living Council.

III. MISSION AND DESCRIPTION

The mission of RISE is dedicated to the advancement of full participation of individuals with disabilities in all aspects of life. RISE provides IL services in the counties of Jefferson, Orange, and Hardin. The center also provides nursing home transition assistance services to Jasper, Newton, Tyler, Polk, San Jacinto, San Augustine, and Sabine counties using state program income funds. RISE was awarded its first RSA grant under Title VII, Chapter 1, Part C, of the Rehabilitation Act in 1996.

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

- **Home By Choice:** This program assists persons with disabilities to move from long-term services and support systems to community-based settings. Services are coordinated through the Department of Aging & Disability Services (DADS) Home By Choice program. This program provides participants greater choice and control over the services received in their preferred setting. RISE Relocation Specialists work directly with consumers wishing to relocate, assisting them with finding a place to live, transitioning, and learning to live independently in the community. Qualified consumers receive vital support such as nursing services, attendant care, case management, prescriptions, medical equipment, and supplies from DADS and community organizations to remain in their own home within the community. From 2008 and 2012, RISE Home By Choice program expended \$421,913 to provide nursing home transition services to 152 consumers.
- **Braille Enrichment for Literacy & Learning (BELL) Youth Summer Camp:** This program, coordinated with the National Foundation of the Blind (NFB) provides children ages 4-12 with one week of intense Braille instruction through fun, hands-on learning activities. The program targets blind and low vision children who are not currently receiving enough Braille instruction in school or who could benefit from Braille enrichment over the summer. In addition to Braille, crafts, games, and other engaging projects, participants enjoy field trips to sites related to the NFB curriculum. This program emphasizes the importance of Braille through a creative, fun curriculum involving reading, writing, science, and non-visual techniques. Participants are able to meet independent and successful role models who are blind, practice their skills, and participate in team- and confidence-building activities. In FY 2012, eight youths benefitted from the BELL program with assistance from five volunteers at a cost of \$18,798.
- **Texas Technology Access Program:** In partnership with the University of Texas at Austin, this program provides opportunities to consumers, their families, advocates, employers, and educators to receive general assistive technology, computer access, and portable computer access demonstrations. Demonstrations include an explanation of the function of a device and instruction in its use. There are opportunities at each demonstration event to use or try a number of devices. At the completion of the demonstrations, information is given about further

assessment if required, costs and funding, and vendors. The goal of this program is to increase access for people with disabilities to assistive technology to improve quality of life and increase independence. In FY 2012, \$56,900 was expended on this program to provide assistive technology to 72 consumers.

- **Job Readiness Program:** This program is similar to an internship. It teaches individuals with disabilities to identify realistic employment options, develop employment goals and objectives as well as learn more about their individual skills, abilities and interests while actually working for RISE. Assessments include personal interview; reviewing work history, skills and interests; and reviewing social and life skills. Staff works with participants to identify assistive technology or specialized devices that will assist them in performing tasks in the workplace. Activities completed by each individual and addressed during the program include attendance and punctuality; completion of personal development classes such as time management, conflict resolution, grooming and hygiene; job search techniques (interviewing and completing applications); review skills needed to succeed in the workplace including how to dress, understanding work ethic and related issues. Between FY 2010 and FY 2012, 38.5 new jobs were obtained by individuals with disabilities through the job readiness program.

IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

- **Services for the blind and low vision:** This aspect of the center's operations targets consumers who are blind or have low vision through an array of services. Specialists work with consumers and provide optical aids such as magnifiers and lighting devices, training in the use of adaptive aids and equipment, mobility training, attending ARD/IEP meetings in schools to advocate on behalf of students and parents, as well as teaching Braille. In addition, RISE partners with the Texas State Library and Archives Commission to provide demonstrations of the Talking Book Program equipment and materials. This program benefits individuals who are blind or have low vision by providing encouragement and training with accomplishing everyday tasks, participating in social activities, communicating, understanding vision impairment, and regaining self-confidence to live independently at home and in the community. In FY 2012, 38 blind and low vision consumers benefitted from this program at a cost of \$20,389.

V. OBSERVATIONS AND RECOMMENDATIONS

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

1. CSR management

Observation: RSA randomly selected and reviewed 17 (seventeen) Consumer Service Records (CSRs) at RISE: 10 (ten) active and 7 (seven) inactive. All the CSRs reviewed contained complete and specific information about services requested, services provided, IL goals or objectives established, and independent living plans (ILPs) and waivers. However, RSA identified the below areas for improvements.

- None of the CSRs reviewed had evidence that the consumer was able to provide feedback regarding satisfaction or dissatisfaction with CIL services. RISE sends out surveys after CIL events but these are not related to IL services provided to individual consumers.
- RISE does not have a process for closing CSRs, and none of the inactive CSRs reviewed contained any evidence that consumers have input in the decision to have their CSRs closed or at what point in the service provider/consumer relationship such closure will occur.
- Electronic CSRs maintained by the nursing home transition specialists did not contain the same level of detail as those of other IL specialists. Most of the case notes documented by these staff are handwritten and placed in the hardcopy files but not entered into the database.
- The hard copy files did state reasons why files are closed on the back of each file. However, they did not clearly indicate CSR status as inactive. This information is contained in the electronic copies but the “other” designation for closed CSRs in the database is confusing. Although reasons stated for CSR closure such as “met all goals,” “died,” or “moved” are listed, the status designation should be “inactive” not “other.”

Recommendation: RSA recommends that RISE:

- 1.1 take steps to ensure that all CSRs include evidence that the consumer is able to provide feedback regarding satisfaction or dissatisfaction with the services provided by the CIL and received by the consumer;
- 1.2 improve its quality assurance procedures to ensure that no CSRs are closed unless there is documentation that the consumer has achieved his or her IL goals and that the consumer has made the decision to have his or her CSR closed;
- 1.3 ensure that nursing home transition specialists document case notes in the database so that all CSRs, hardcopy and electronic, contain the same level of details about services provided by the CIL and services received by consumers;
- 1.4 develop and implement a CSR closure process that clearly shows that a CSR is closed or made inactive with input from the consumer; and
- 1.5 reset the CIL Management Suite database to accurately designate CSR status as either “active” or “inactive,” not “other.” This will separate CSR status from reasons for CSR closure and avoid confusion.

RISE Response:

1.1: RISE provides satisfaction surveys for consumer and the community on a regular basis. It is the choice of the consumer and/or community representative to return the survey for analysis. The surveys provided after a particular activity have a higher return rate.

1.2: RISE will continue providing staff with training concerning the closure of CSRs. The previous training provided, by ILRU, presented information on the 5 closures as mentioned in the 704 report instructions. However, RISE will make it a priority to document in the CSR the consumer’s reason for requesting the closure of the CSR. If the consumer’s reason does not meet the definitions in the 4 other

closures listed...an attempt to encourage the consumer to disclose more information to clarify the closure “Other”.

1.3: RISE has laptop computers that are available for the HBC staff. In assessing the use of computers in the field to accurately document HBC activity, it has proven to be time consuming and not safe. HBC staff cover 13 counties and visits many other professionals. This year staff have relocated 175% more relocations than the prior year. HBC staff have Fridays to catch up on their paperwork. The ED has delegated a staff member to enter data in the CIL Management Suite database. In the future, there may be a need to revisit our procedures but this method is working for RISE and the consumers at this time.

1.4: RISE has a process for closing CRSs. Refer to Recommendation 1.2.

1.5: Each CIL who uses CIL Management Suite is using the same procedure RISE is using. Active and Inactive is synonymous with open or closed. The user can also select from status of **SHOW ALL CLOSED (INACTIVE)** to select a reason for closure (if a reason is given) such as **Complete Goals, Died, Moved, Other.**

Technical Assistance: For assistance in this area, RISE staff may take the CSR rapid course offered through the Independent Living Resource Utilization (ILRU) at their website: <http://ilru.org/html/training/rapidCourses/index.html>. This module, the first in a three-part series and covers the CSRs and ILPs, fundamental federal requirements for record keeping and reporting, the importance of CSRs in meeting the reporting requirements for the annual federal 704 Report of services and activities, and useful practices for gathering consumer information, developing ILPs, and maintaining complete and accurate records. The primary audience is front line workers in CILs and it is designed to be used in orientation and training for new CIL staff and as a refresher for existing staff.

VI. TECHNICAL ASSISTANCE

During its review, RSA provided technical assistance regarding the need for RISE to develop and implement a formal training for board members focused on board roles and responsibilities. RISE could consider including such topics as CIL board roles and responsibilities, nonprofit governance, IL philosophy and history, program development and evaluation, as well as fundraising and resource development. As part of its training and development process, RISE can utilize the training and technical assistance resources offered by the Independent Living and Resource Utilization, IL-NET. Information about upcoming training can be obtained via its on-demand training link which can be found at: <http://ilru.org/html/training/index.html>.

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: Resource, Information, Support and Empowerment, Inc. (RISE)
Grant #: H132A960004
State: Texas

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: RISE Articles of incorporation; bylaws; CIL policies and procedures; program descriptions

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

 5 Number of persons on the governing board.

3 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.

Yes 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.

Yes The CIL has a written process for identifying and recruiting board members.

Verification Sources for Governing Board: CIL board roles and responsibilities; bylaws; bylaws; information obtained from CIL staff and board

(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>3</u>
Other staff positions	<u>4</u>	<u>14</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:

1 Number of minority¹ employees (decision-making and other staff positions)

Verification Sources for CIL Employees: RISE staff list and organizational chart; information from staff

¹ In this instance, "minority" refers to members of racial or ethnic groups that have been traditionally underrepresented.

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.

Verification Sources for Self-help and Self-advocacy: CIL programs and services; CIL bylaws; information from CIL consumers and staff.

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: CIL programs and services; CIL bylaws; information from CIL consumers and staff.

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.

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

Verification Sources for Equal Access: personnel policies and procedures; Observation of review team; information from CIL consumers and staff; CIL programs and services

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: CIL bylaws; CIL programs and services; information from CIL staff and consumers; CIL mission statement, purpose and goals

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 appropriate.

Recommended Practice:

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

Verification Sources for Independent Living Goals: CIL Management Suite – database; CSRs; CSR management policies and procedures

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:

- 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: CIL programs and services; information from CIL board, staff and consumers

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: CIL programs descriptions and services; mission statement; purpose and goals; information from CIL consumers, board and staff; CAP literature; 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: CIL bylaws; policies and procedures; review of CIL funding sources and accounting policies; information in CIL board minutes regarding fundraising activities; information from CIL board, staff and management

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: RISE 3-year program and financial work plans– revised and submitted to RSA on 06/04/2013

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: RISE organizational Chart; job descriptions for management and staff; personnel 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: RISE training and development plan for staff, management and board

Reviewer’s note: The training plan for board members should be revised to include specific topics such as fund raising, and CIL board roles and responsibilities.

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: RISE conflict of interest policy and forms; personnel policies and procedures applicable to board and staff; CIL bylaws; Interviews with Board members, management 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: RISE personnel policies and procedures; tour of office areas, files and staff interviews.

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.
- Yes 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: RISE Drug Free Workplace policy; ongoing drug-free workplace awareness program and documentation policy

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: Copy of 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: RISE bylaws; personnel policies and procedures; affirmative action statement; nondiscrimination policy

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.

Verification Sources for Prohibition Against Lobbying: certification against lobbying; policy against lobbying with federal funds; discussion with board, and management.

Part III

GRANT MANAGEMENT

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

(A) Title VII, Ch. 1, Part B	\$
(B) Title VII, Ch. 1, Part C	\$279,323
(C) Title VII, Ch. 2	\$
(D) Other Federal Funds	\$52,469
(E) State Government Funds	\$
(F) Local Government Funds	\$
(G) Foundations, Corporations, or Trust Grants	\$4,070
(H) Donations from Individuals	\$
(I) Membership Fees	\$
(J) Investment Income/Endowment	\$636
(K) Fees for Service (program income, etc.)	\$131,158
(L) Other Resources (in-kind, fundraising, etc.)	\$

Item 4 - Total Income

Total income = (A)+(B)+(C)+(D)+(E)+(F)+(G)+(H)+(I)+(J)+(K)+(L) \$467,656

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) \$

Net Operating Resources

Total Income (Section 4) <minus> amount paid out to consumers (Section 5) =
Net Operating Resources \$467,656

XIV. Grant Related Income

34 CFR 364.6; EDGAR 34 CFR 74.2 and 74.24

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

Verification Sources for Grant Related Income: DAD’s–HBC relocation program

XV. 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: Copy of budget and fiscal procedures reviewed

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: Jim Brocato, 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: **RISE Fiscal Policy and Procedures, page 69 - Case Management Policy, first paragraph**; QuickBooks /computer

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:
QuickBooks for Non-Profits

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

- General Ledger
- Grant Ledger
- General Journal
- Cash Receipts

Describe other(s): cash disbursements

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

- Cash basis
- Accrual basis

Describe other(s): QuickBooks

Verification Sources for Accounting Systems: 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: Reviewed Personnel Policy and Procedures

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: \$10,000

The person(s) responsible for purchasing equipment and supplies: *Donna Hobbs – office personnel*

Verification Sources for Purchasing: reviewed invoices and requisitions

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: June 8, 2011

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

Name/Title of designee: Jim Brocato, 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: Reviewed hard copies/computer files of inventory listing and property information

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 polices 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: record retention policy; observed retained records located in file room/fire protected cabinet

XXIV. 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: N/A