



CENTERS FOR INDEPENDENT LIVING COMPLIANCE REVIEW REPORT

Vermont Center for Independent Living (VCIL)

Grant Award Numbers: H132A930063 (Montpelier) and H132A930549 (Brattleboro)

REVIEW DATES: February 11-13, 2013

Draft Report: April 3, 2013

CIL Response: May 3, 2013

Final Report: May 21, 2013

REHABILITATION SERVICES ADMINISTRATION

TABLE OF CONTENTS

I. PURPOSE OF THE ON-SITE MONITORING REVIEW	1
II. METHODOLOGY	1
III. MISSION AND DESCRIPTION	2
IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES	3
V. OBSERVATIONS AND RECOMMENDATIONS	3

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 Vermont Center for Independent Living (VCIL) was conducted from February 11-13, 2013. The program review covered the independent living (IL) operations and activities of VCIL, and the financial review examined its 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 program specialist;
- Rebecca Coffin, non-federal reviewer and;
- Samuel Liss, Chair, Vermont SILC.

III. MISSION AND DESCRIPTION

VCIL's mission is to empower Vermonters with disabilities, Deaf Vermonters, and others "to tear down the physical, communication, and attitudinal barriers that keep us from realizing our full human potential."

VCIL provides independent living services statewide. The center was awarded its first grant under Title VII, Chapter 1, Part C, of the *Rehabilitation Act of 1973, as amended*, in 1993.

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

Meals on wheels: This program provides hot meals to Vermonters under age 60 with chronic conditions or disabilities. The program assures that people who are unable to prepare their own meals and have no one to help with meal preparation get at least one hot meal five days a week. Meals are provided on an emergency, short-term, or long-term basis depending on need. Consumers who receive personal assistance or other supports for meal preparation are not eligible for meals on wheels services. In FY 2012, 572 consumers received 58,281 meals in the amount of \$6,197. Funding for the program is appropriated by the Vermont Legislature and administered by the Department of Disabilities, Aging and Independent Living.

Benefits to Work: This program helps consumers plan for employment and greater independence. Consumers learn how to take advantage of work incentives that can give them greater total monthly income or help them pay for college. VCIL staff also answers questions about the "Ticket to Work Program" and what it can and cannot do for consumers. In FY 2012, this program provided services including information and referral regarding Social Security Administration's work incentives and developing benefit summary and analysis to 39 consumers.

Community Access: This program is aimed at improving access to buildings, services and programs in the state of Vermont. Program specialists provide technical assistance and training to employers, businesses, law enforcement agencies, domestic and sexual violence programs and shelters. In FY 2012, this program provided 301 training sessions at 12 events, and 286 individuals and agencies received technical assistance through email, in-person visits and by phone. VCIL also participated in 34 public awareness events in 2012. The Community Access program is supported by the regional DBTAC ADA Technical Assistance provider – New England ADA Center which is funded by the National Institute of Disability Rehabilitation and Research (NIDRR).

Home Access: This program provides home entry and bathroom modifications for people with disabilities whose income is 80 percent of their median income. The modifications are designed with the individual in mind and may be as simple as an entry ramp to a house, an accessible shower, or a handheld shower attachment.

IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

Sue Williams Freedom Fund: This program was endowed as a trust fund in 1979 in honor of a former board member to provide funding for services and equipment to help people with disabilities achieve or maintain independence in their own homes. In FY 2012, this program expended \$28,591.94 to purchase 61 items for 51 individuals with disabilities. These items included eight vehicle modifications, nine cooking aids, three mattress chambers, two sets of dentures and five mobility aids. One consumer obtained an alarm system equipment that includes door, smoke and sound alarm lights that flash when he has a visitor at his door, a videophone call or a household emergency such as carbon monoxide or fire. His increased sense of safety has increased his independence.

AgrAbility: Vermont AgrAbility is a USDA-funded collaborative partnership between the Vermont Center for Independent Living, University of Vermont Extension, and Rural and Agricultural Vocational Rehabilitation agency. The program provides education and assistance to farmers and farm workers with disabilities who are engaged in production agriculture and want to continue farming. Vermont AgrAbility is comprised of the below components.

- Information and Referral--provides information about farming safely with a disability and referral information on services available in agriculture, rehabilitation and local communities.
- On-site Technical Assistance--conducts on-site home and agricultural worksite assessments and recommends ways to safely continue farming. Recommendations may include how to restructure work tasks or operations, explore alternative agricultural enterprises, modify farm equipment and tools, and/or acquire agriculture related assistive technology.
- Peer Support--connects farmers with newly acquired disabilities with others who have successfully accommodated their disability.
- Training and Education--provides training and education about farming with a disability for rehabilitation and health care practitioners, agriculture professionals, emergency response organizations and other community agencies.

In FY 2012, about 64 farmers benefitted from Vermont AgrAbility.

V. OBSERVATIONS AND RECOMMENDATIONS

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

1. CSR management

Observation: VCIL does not have written consumer service records (CSR) management policies and procedures. As a result, there is no consistency in how staff document Independent Living service provision activities conducted with consumers. RSA randomly selected and reviewed 30 (thirty) Consumer Service Records (CSRs) at VCIL; 15 (fifteen) from each of the center's two Part C grants. The CSR information and accompanying narratives were not always consistent in

layout, format and quality. For example, there was no uniformity in where documents are placed in files; and not all records reviewed contained the same level of detailed information.

Recommendation: RSA recommends that VCIL:

- 1.1 finalize development of its written CSR management policies and procedures for immediate implementation; and
- 1.2 provide training, supervision and quality assurance to ensure that staff consistently follow procedures related to case management and CSR documentation.

Technical Assistance: RSA has provided VCIL with sample policies and procedures to use as a tool in the development of their own. VCIL staff may take the CSR rapid course at <http://ilru.org/html/training/rapidCourses/index.html>. This module, the first in a three-part series, is offered by the Independent Living Resource Utilization 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.

VCIL Response: VCIL is in the process of developing its written CSR management policies and procedures in order to ensure consistency in how staff document Independent Living service provision activities conducted with consumers. The CSR management policies and procedures will be completed and approved by the VCIL board on or before June 20, 2013, and fully implemented beginning on or before September 30, 2013. Implementation of these policies and procedures will include ongoing training for staff members to ensure consistent following of procedures related to case management and CSR documentation.

2. Ongoing Drug-free Workplace Program

Observation: VCIL has established an annual on-going drug-free workplace awareness program to educate its staff about the dangers of drug usage, CIL policies, resources, and the consequences they may face for not complying with the policies. However, VCIL does not have documentation confirming that its employees participate in the center's annual ongoing drug-free workplace awareness program. As a result, there is no official documentation that the employees understand VCIL's policies or the center's stated purpose to remind and update the employees of the policies, resources and the consequences of not following the policies.

Recommendation: RSA recommends that VCIL develop a means of documenting that the employees have participated in the center's annual on-going drug-free workplace awareness program.

Technical Assistance: Two ways the CIL could document that employees have participated in the annual on-going drug-free workplace awareness program is to include this activity in meeting minutes where the program is offered along with the list of employees participating in the meeting or provide certificates of completions and include a copy in the personnel files of each employee. This documentation could then serve as the CIL's official record.

VCIL Response: After the April Drug-Free Awareness training, VCIL documented that all employees participated and understood the policy and the consequences of not following the policy, by collecting their respective signatures. Documentation confirming participation and understanding the Drug-Free Awareness policy training will be collected on an annual basis.