



CENTERS FOR INDEPENDENT LIVING
COMPLIANCE REVIEW REPORT

IndependenceFirst

Grant Award Number: H132A930012

Milwaukee, Wisconsin

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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
VI.	FINDINGS AND CORRECTIVE ACTIONS.....	3
VII.	TECHNICAL ASSISTANCE.....	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 IndependenceFirst, located in Milwaukee, Wisconsin, was conducted June 10-13, 2013. The program review covered the 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. 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:

- James Billy, RSA program specialist;
- Debora Krider, nonfederal reviewer; and
- Katherine Enders, representative, designated state unit.

III. MISSION AND DESCRIPTION

IndependenceFirst serves the four county metropolitan Milwaukee area. Its mission is to effectively facilitate empowerment of individuals with disabilities through: education, advocacy, independent living services, and coalition building. IndependenceFirst was first awarded a RSA grant under Title VII of the Rehabilitation Act in 1979.

In addition to the four core services, IndependenceFirst is involved in the projects described below.

- **Assistive Technology:** IndependenceFirst has information available on over 50,000 products and services related to assistive technology and a total of 600 assistive technology devices that are available for trial use by individuals with disabilities. In 2011, IndependenceFirst helped 221 persons with disabilities, their family members, and/or service providers become knowledgeable purchasers of adaptive or assistive technology.
- **Youth Leadership and Independent Living Services:** IndependenceFirst offers services to youth with disabilities including Disability Mentoring Day, skills training, youth peer support groups, transition classes for high school students and more. Youth Leadership Summits have assisted youth in the development of leadership and advocacy skills, resulting in positive life changes such as going to college and moving out of their parents' homes to live independently.
- **Computer Recycling Program:** IndependenceFirst assists individuals with disabilities to obtain recycled computers and also provides basic computer training. In 2011, a record 352 low-income people with disabilities received a used computer through this innovative program which collects, refurbishes and redistributes personal computers. Studies show that people with disabilities benefit substantially from computer and internet access as a means of reducing isolation, increasing personal autonomy and helping the pursuit of employment opportunities.
- **Adaptive Sports and Recreation:** IndependenceFirst offers hundreds of children and adults with disabilities the chance to engage in a variety of integrated and adapted sports opportunities including snow skiing, water skiing, basketball, ice hockey, beep ball, and other sports. A popular addition to the program has been "Biking Buddies," a program that enables people with disabilities to enjoy the bicycling experience through the utilization of duet bikes, also known as wheelchair tandems, and with the help of volunteers, trained as "pilots."
- **Employment Services:** In addition to benefits counseling and career exploration, IndependenceFirst provides internships for individuals with disabilities. Six employment internships, lasting two to six months, were provided in 2011 with local employers, resulting in an eventual hire, certification for two interns, and work experience for others.
- **Personal Assistance Services:** Personal assistance services are offered by IndependenceFirst through two program options: the attendant referral program that provides a recruitment and referral resource for individuals with disabilities that want to hire and manage their own attendant; and a personal attendant services program that operates with registered nurse supervision and case management.

- **Mobility Store:** This program offers high-quality, low cost, new and refurbished mobility and medical equipment to individuals who might otherwise not be able to afford the equipment they needs, which maintains their health, safety and independence.
- **WisLoan:** WisLoans is an Alternative Financing Program offering low-interest revolving loans that allows Wisconsin residents with a disability to purchase assistive technology or make home modifications so that he or she can live more independently or productively.

IndependenceFirst also assists with housing services, community education and outreach related to disability and accommodations, and transition to community living.

IV. ORGANIZATIONAL STRENGTHS AND EMERGING PRACTICES

Under the strong leadership of its executive director and board, IndependenceFirst offers over 20 programs and services to individuals with disabilities and provides programs on disability awareness, employment-related topics, and access to the general community. IndependenceFirst’s strengths are described below.

- **Model of Accessibility Facility:** IndependenceFirst operates in a facility that is a model for office accessibility. Its accessible design and neighborhood aesthetic earned IndependenceFirst the 2009 MANDI Award from LISC Milwaukee. The MANDIs recognize the inspiring, innovative, and tenacious work of people who are improving the quality of life in the city.
- **AODA Outreach Project for Persons who are Deaf, Deaf-Blind or Hard of Hearing:** The State of Wisconsin Department of Health and Family Services provides funds for a targeted outreach program with the goal of increasing access to Alcohol and Other Drug Abuse treatment services by persons who are deaf, deaf-blind, or hard of hearing.
- **Outreach and Education Regarding Violence Against Persons with Disabilities:** IndependenceFirst conducts outreach and education activities to both service providers and the community about violence against persons with disabilities. Staff members have been involved in activities such as providing shelters with accessibility assistance and educating the community about caregiver abuse.
- **Telework Loan Program:** IndependenceFirst offers an alternative loan program that allows Wisconsin residents with disabilities to purchase computers and other equipment needed to work from home for an employer or to be self-employed through a home based business.

V. OBSERVATIONS AND RECOMMENDATIONS

During its review activities, RSA did not identify any observations or make recommendations for IndependenceFirst.

VI. FINDINGS AND CORRECTIVE ACTIONS

RSA identified no compliance findings.

VII. TECHNICAL ASSISTANCE

RSA provided technical assistance during the on-site review regarding consultation about the role and activities of the board of directors in concert with the executive director as it relates to the development of a succession plan for the board of directors and the center's leadership.