Assessing the Health of Your CIL: Preventative Management Checkup Using RSA's Review Tool, Part 1: Preparation and Standards presented by Paula McElwee on May 1, 2013

>> TIM: Good afternoon, I'm Tim Fuchs. I'm
with the National Council on Independent Living here in DC and I
want to welcome you all to the first of two presentations in CIL
nets webinar series assessing the health of your independent
living. This is presented by the CIL net, a program of the
training and technical assistance project. It is operated
through a partnership among ILRU, NCIL and April. Supported by
the USA at the Department of Education, and I'm going to hold on
just a second for those of you on the telephone. Thanks for
your patience, it looks like we're just going to take a second to
get the audio up on our webinar are screen.
(Pause.) Is and if you're just joining us, thanks for
your patience. We're just getting the audio loaded on to
the webinar, and we'll begin again in just a moment.
Again, if you're just joining us, we're just getting
the audio loaded on the webinar, we'll get started in just
a moment. Thanks for your patience.
(Pause.)
>> TIM: Again, if you're just joining, thank you for your
patience, sorry for the delay. We're getting the audio loaded on
to the webary. We'll start in just a moment.
>> TIM: Okay. For those of you on the phone, thank you for
your patience. We are working to upgrade to a new webinar
platform. This is disa pointing, we can't get the audio loaded
on the webinar. So we are currently asking the folks on the
webinar to dial into the teleconference. So we're going to give
them a moment to do that. And then we'll start. And we'll be
using a new -- new platform soon to work around this problem.
Thanks again for your patience, and we'll continue a few minutes
after 4:30 Eastern this afternoon so that you all get the full
presentation.
So just a moment while we get the folks in the webinar
logged on to the teleconference.
(Pause.)
>> TIM: Okay. So, again, we're just letting the folks in the
webinar have time to join the teleconference. I posted that
number, that's 866-901-2585. So if anyone else from your
organization is on the webinar, if you could have them join the
teleconference. The other functionality of the webinar, the
public chat, the PowerPoints, will still work. This is just to
gain access to the audio. And we'll begin in just one minute,
literally one minute, we'll start at three:threfl Eastern Time.
And we will go until 4:42, and again, I'm really sorry for the
inconvenience. We are finishing up in this webinar platform, and
we're going to move to an improved platform in the near future.
So thanks for bearing with us, so we're really sorry for this
problem.
Okay, let's begin and as we work through our
introduction hopefully everyone else in the webinar will
join us and gain access to the audio.
So, as I was saying, we are recording today's call, so
that we can archive it on our website. So be aware that
this presentation and the PowerPoint will be available after
the fact if you want to review it or if you want to share it
with any of your colleagues. We will break several times
during today's presentation to take your questions. For
the folks on the webcast, you can ask questions by using
the TextBox under the immotor toe con's on the webinar
platform. If you're on the telephone, you can ask
questions by pressing seven and we'll have several Q&A
breaks during the call.
If you do not have the power point displaying in front
of you, you'll want to make sure to get that. That was sent
to you in the confirmation email as an attachment. Of
course, if you have the webinar screen open, you can see it,
and it will display and change automatically.
So if you don't have that PowerPoint presentation,
you'll want to get that before we begin.
If you don't have it handy, you can email me. I've
got my email open at Tim at NCIL.org. That's Tim at
NCIL.org and I'll give it to you right away. Please do take
a minute affidavit today's call to fill out the evaluation
form. It's very easy to complete. It's brief, but it's
very, very important to us. We review every single one, and
we take the comments very seriously. So please do fill out
the evaluation form. I know some of you are participating
in groups today and that's great, but please do fill out the
evaluation individually. We'd love to know what each of you
thinks, and we -- I'll remind you of that at the end of the
call. The link to that evaluation was also in the
confirmation email and will be on the last slide of today's
presentation.
So, before I begin, I want to introduce our presenter,
Paula McElwee. Paula is a technical assistance coordinator
for the IRL project at ILRU. Her experience with
independent living includes LINK, Incorporated in Kansas is
that so one of the first directors of one of the first ten
Federally funded centers back in 1989, also served three
terms on the Kansas S IL C, and as inter-Rittelmann
Executive Director of four different S IL Cs in California
along with the foundation for centers and numerous centers
throughout the state. She's a real expert on independent
living programs and applicable laws and regulations. We're
really grateful to have her Eoin our team and we've enjoyed
planning this call with her and I know you all will enjoy
hearing from her working with her on the next two calls
today and next Wednesday on the eighth. So with that, I'm
going to turn it over to Paula to get us started. Paula.
>> PAULA: Thank you, Tim. I am so excited to have so many
people together in this call, because this is such an important
topic. One of the things I do with ILRU is that I provide
technical assistance if you ask for it, but also when your center
is needing intensive support, and that often happens in
relationship to an RSA review.
So let's take a look at the RSA review tool. And why
we want to use it proactively, you know, to tackle some of
this.
So take a look at this next slide. We're going to
look at, why would we want to use and know the RSA's review
tool?
And there are -- you know, there are several reasons
that we want to use RSA's language and RSA's checklist to
take a look at how -- what our expectations are for our own
center.
If we review for ourselves, it's going to be much more
effective than waiting for a review to find out what might
need to change, as you might -- as you might guess.
So, this -- this tool is -- I'll give you the link in
just a second, is what actually is used by the reviewers
when they come on an onsite review for RSA. You may not
have an onsite review in your near future, or you may. But
this is a tool that you can use to prepare yourselves to
meet the requirements, whether or not you have a review
coming up soon.
Now u as we think about that next piece, the -- the
number of reviews and whether or not you're going to get
reviewed, and that kind of thing, here's what we're finding:
Sometimes people are asking us: Well, is RSA doing more
reviews than they used to?
And the answer is yes.
So, if you look at the Rehab Act, it requires right
now that 15% of centers be reviewed annually. And there was
a recent inspected general's report that found that they
were not meeting this goal. And we've got the link there
for you if you want to look at that report itself.
As a result of that -- partly as a result of that the
RSA staff have increased their activity but they don't have
a lot of capacity to do that full 15%. 15% would mean that
every center would be reviewed every 6 or 7 years, about,
and when you look at that kind of time-frame, there are many
of you who have not had a review in that time-frame.
So you know that that's not -- not been happening in
the past.
Now, their current, you know, staff are stretched so
that they don't have the capacity to do quite that many and
also with sequestration we don't really know how much
further that's going to stretch those resources. So 15% may
not be possible, but we have definitely seen increased
activity.
There are a number of centers being reviewed each
year, and it looks like they are -- are getting closer to
that goal of that 15% as they go along.
So... But you know what? It doesn't matter whether or
not they're going to come and see you, in that we want to be
ready anyway.
So, as you look at how to meet and know your legal and
contractual requirements, you want to do the right thing.
And the centers we want to monitor ourselves anyway, it's
something that's important, and it's a part of our
philosophy that we would like to make sure that for
ourselves, that our quality is what it ought to be.
So why not use that actual checklist, that onsite
checklist to check our readiness and our compliance, whether
or not we have that survey coming up soon.
So here's where you get that document.
There is an actual checklist that can be downloaded in
either PDF or Word form, and the link is there on your
screen.
That is the same form that the onsite reviewers will
use, and that is -- that is the document that will -- as it
changes, it will actually change on that site as well.
So if there are changes in this document, we're going
to go through it in detail with its current content, but if
there are changes, you will find them, you can download the
most current at that link.
Now, RSA provides about 30 days notice before they
actually come onsite to review you. And as we look at the
content, you'll see that that's not enough time to be fully
prepared, if you haven't already looked at what they're
going to want to see.
So, let's take a look at this next slide and talk
about how can we review, collect, and organ our information
for ourselves, both so that we're ready if we're going to
have an external review, but also because we want to be in
compliance.
And my first advice to you is: Don't just go down the
checklist and work it. It's other than easy thing to sit
around a table, sometimes people will do this, and look at
the checklist and say do we do this and somebody says, yeah,
we do that, and then somebody says, oh, yeah, no problem,
oh, yeah, we've got that.
That is not what we're talking about here with this
review. If you go down the checklist and mark it, it's not
going to be the tool it can be to assist you.
What we're suggesting is that you actually locate the
document or write on the list the person that has the proof
that you need to meet that item, because when the reviewers
come onsite, when your peer reviewer and your RSA team come
onsite to do an actual review you need to show them, not
just tell them that you're doing the work.
So, take the time, when you're going through your
checklist, to make sure that you write down where did you
find it? If you number your policies, put the policy number.
Take the time to know where the proof is that you made
that. Because in the excitement of a survey (laugh) you may
find that it's hard to remember.
So, take the time to write down it.
Now, a tip that we have is that if you make a folder
for each of these compliance items, and you put the
documents in those folders, you will have the documentation
you need.
So if you're preparing for an actual survey, you want
to put those most current documents there and put -- and put
them aside, make them available, so that when the team comes
onsite, you're ready to go.
And you also want to identify who can be interviewed
related to this information. Because the team will not just
talk to the Executive Director, or the President. The team
will talk to all of your staff, and also to consumers who
are onsite during that review. So think about, who would
you like to invite to be onsite so that the reviewers can
have the most accurate information, the most complete
information about how you do things.
Now, recently I was working with someone on a -- on a
corrective action plan with the review, with a recent
review, and the team from RSA mentioned some of the people
that weren't available to them during the review. And that
really did go against that center in relationship to the
area they were concerned about. And that situation, it was
an accountant. They contracted with an accountant to come
in and do some of the financial speSs, and because that
person was not available during the review, the RSA team
conver Phi some of what was being said. And so don't punish
yourselves. Make sure that you get the people onsite if
you're having an actual review, who can be interviewed,
related to that information.
Let's look at the next slide.
Now, this document that you're going to put together,
this checklist of your own, it's yours. When a team comes
onsite, you don't have to hand them your checklist. In
fact, it probably wouldn't help anyway, because that's back
to telling, not showing.
You probably want to make it a working document.
And so it may not be pretty.
You're going to take the time as you go through it to
develop a plan of action, so you might write, right out in
the margin that Joe's going to do that.
And then check back at your next -- next opportunity
and see, did Joe do that.
So as you look at these -- at this checklist, and at
the review items, you're going to want to make sure you use
the checklist for your own -- for your own use as a tracking
document. Update it as often as you need to. Handwrite it
if that works better for you. But it doesn't have to be
pretty. It just has to be functional, so that it works for
you.
Next slide.
So we're going to look at some of the documents that
you need to gather for a review.
Remember these things about those documents: For one
thing, one or more of your reviewers may need an alternate
format or other reasonable accommodation to access your
documents. So if all of your documents are printed, but you
don't have them in a Word file or another accessible format
for someone to use a screen reader with, you may find that
you need to provide a reader for the reviewer, so that that
can be provided.
Um -- you may want to make sure that your policies are
all in Word format, because that's going to increase the
accessibility for your day-to-day operations, as well, not
just for your review.
If you are setting up your folders, topic by topic,
you set up those files for each area that's being reviewed,
sometimes the same policy is used in -- um, in two different
or three different areas.
Make another copy anyway.
For example, the bionic laws are going to say several
things, they're going to talk about how your Board is
structured. They're going to talk about board recruitment
probably. They're going to talk about 51% of your board
having disabilities. So you're going to want to make sure
that it's in all three of those places, as you set up your
files.
Now, I suggest that you highlight those. Highlight
the part that has to do with the question being asked in
that particular part of the checklist, because if you
highlight under the -- under the one that asks about
consumer control, if you highlight the bylaws provision
stating 51% of your board must have a significant
disability, that's going to be really easy for the reviewers
to find. And you want to make it easy. You do not want to
set up a situation where during your review you're always
scrambling for documents. You want to make sure that you
have the documents in place.
You might have more than that related to your 51% on
your board. You may have an additional policy. You may
have a roster that indicates disability status. You might
have a board self-disclosure form. Sometimes centers will
use that. Any of those are certainly appropriate to put
then in that folder to document that particular item.
And that same principle can be used as you look at all
the different items that we're going to review now.
Next slide.
So we also want to look at who would be good to
review. I kind of mentioned this a second ago, but your
Board Chair, absolutely. They will probably ask you to
arrange that, but there may be other Board Members who have
specific history or expertise that you want to share. And
you can arrange for more of them to come to the orientation,
talk to the survey team, be on the appointment list, if you
have something specific that they're going to be the experts
on.
If you use an outside accountant, I mentioned that.
For some of your financial processes, they should be
available. If you don't have them available, it will make
it more difficult for the survey team or the review team to
come up with the documentation or the proof that -- of
certain processes that your policies are implemented in
certain ways regarding the finances.
Now, you also want to consider inviting consumers who
get the philosophy, or who can express different service
options or who can demonstrate a range of services.
There are a number of things that they are looking for
as they review your services.
And they will get a lot of that from the paper file.
That's going to be something that we'll talk about mostly in
the next session.
But as you look at the -- the paper file, you want to
think: Okay, but we could also invite consumers who get --
who get it, who understand the philosophy, who can express,
oh, yes, I receive independent living services, and here's
what they are.
And who can show that you demonstrate a range of
services, a range of disabilities, and a range of ethnic
communities, so that you can show the full diversity of your
services through the people who come to that -- to that time
when you're being reviewed.
And also, you want to make sure that whoever
understands the data used in the 704 report, how it's
collected and how it gets to that report, that person needs
to be available also during that -- that actual review, to
be interviewed.
And as you're preparing, you probably want to talk
with them, with all these same people, to make sure that
you -- you know that they know what they're going to be
asked as they go through the process.
Now, let's look at the next slide.
You're also going to have your legal documents
available for review. And this is actually the beginning of
the checklist now. We're rolling into the actual checklist
content. And they will tell you in the -- in the checklist,
itself, that these documents would be available. That
includes your articles of incorporation, your 501(c)3
certificate with IRS, always your bylaws, your IRS form 990
and other supporting documents, any license that is you're
required to have, contracts or agreements that you have with
other funders or with partners.
Your insurance policies, and sometimes that's
summarized in a -- in a certificate of insurance, which is
probably sufficient. But you want to have that both
available.
And then the original RSA-approved application for
Part C funds.
Now, if you don't have the original, we'll talk about
that a little further. The reality is that some of the
centers have been around for a long time and you may not
know where your RSA application is. You can certainly ask
the person at RSA who oversees your area about that. We are
finding that sometimes they aren't there.
Some of you who have long memories remember the days
of Regional Offices. And those Regional Offices w, were the
point of contact for sends. And when those regional fS 0s
closed there have been a few cases when the original
application is not there.
However, if RSA has that original approved application
for Part C funds, they are going to hold you accountable to
that original set of goals. And the population or the --
the geographic area or whatever that you were serving.
They will be asking you for that.
Now, let's look at the next slide, some tips about how
you review that original application.
You want to look at any special populations you said
you were going to serve. You want to look at any geographic
areas you said you were going to serve. And if you aren't
adhering to that original proposal, that's okay, as long as
you have correspondence with RAS related to those changes.
So, if not, that means it needs your attention.
So this is something that you need to do a little
internal research for yourself regarding. What was your
original application? What did you say you were going to do?
Because we are finding that RSA is holding you accountable
to some of the conditions of that original application,
unless you actually were able to work out in writing that
you were going to do something different.
Okay. Let's look at that next slide.
Your organizational documents will also need to be
made available to the surveyor, and these are things that
you'll be looking at when you do your own compliance
checkment that includes your mission statement and program
descriptions which ought to agree back with, you know, the
requirements of that original grant as well.
That will include your organizational chart. It ought
to be easy to see how many staff you have and who reports to
whom.
If your organizational chart is set up for how --
how -- let me see how I can say this.
Sometimes when I've reviewed an organizational chart,
I get confused, because it looks like there are a lot more
staff people than there are. Because the tendency sometimes
is to put the function rather than the name and title. And
then all of us wear more than one hat. And so sometimes we
are going to show up with more than one function.
If you do that kind of a chart, you probably also need
to do a chart that shows the actual staff names and titles
and how they -- you know, who they report to as a separate
document, because the one with all the different tasks, it's
just really hard to determine as you're doing a review, what
is meant by that, and who people work with, and all that
kind of thing.
And you're looking for the wrong numbers of people,
and you're thinking, well, where is everybody? Because
there's all these boxes on this organizational chart.
So make your organizational chart clear and simple and
habited here to those kinds of guidelines about clarity.
You probably will have a staff roster. And it needs
to include disability status.
Now, in the case of the Board Members, the 51% have to
have significant disabilities. That word significant is not
in the staff situation. So any disability would be
reflected there if staff disclosed their disability.
Also, your governing board roster, including
disability status, minutes of your governing board meetings
for at least the past year. They may look back as far as
three years, typically not any farther than that.
And all of your policies and procedures, and some of
you have all of those in one book, others are on one file.
Others you of you have operational policies separate from
fiscal policies and personnel policies and so forth, but you
need to collect them all and make sure that they're
all-in-one place and easily accessible by the reviewers and
by you as you're looking for whether or not you've met the
review items.
We're ready for the next slide.
And then you're also going to look, when you look at
those fiscal policies and procedures, you're also going to
look for your procurement and property disposal policies.
And a lot of times, those policies are somewhere else.
They're not in the fiscal day-to-day policies and
procedures, but they are considered fiscal policies by RSA.
And then you're also going to want to look at your
travel policies, which often appear over in your personnel
policies, but they are a fiscal policy for how much the
travel reimbursement is, because RSA looks at that to see --
to make sure that it's allowable and reasonable. And you're
also going to look at financial statements as a part of
this. Whatever the reports are to your board, your payroll
records, your equipment inventory, your annual audit. Those
are -- all those documents are also going to be needed. And
remember, you're probably going to want to copy and
highlight sections of these documents into the file folders
that you create for each of the checklist items.
You want to keep the originals, though, back in the
whatever notebook you keep that set of policies and
procedures in, so you have a complete set.
Don't remove them and put them in a folder, but copy
them and put them in a folder.
Next slide. One of the other -- some of the other
records that they would be looking for is of course your
consumer service records. And some of those are actual
physical records, others of those are electronic files.
Either way, they need to be available to the staff. And
when we talk about this part a little bit more, we will
discuss what needs to be in a physical record and what can
be electronic, a little bit further. You're also going to
look for your service delivery policies and procedures, your
confidentiality policies, how you assess consumer
satisfaction. What instrument do you use? How do you
present that information to your board, how do you present
that information to your S IL C are all part of that
consumer satisfaction piece.
And then you will need your annual and three-year
program and financial plan objective.
And you need to at least be looking at what you're
working with right now and what you're looking for in the
next year with your detail and your objectives. Now, that
was a lot of stuff. That's what they expect you to have
available when they do the review. And as soon as you can
have that out for them that's going to give them some good
activity around being able to find all the things that they
need to find to verify that you're compliant.
Okay. Let's look at the next section. That's the
review of consumer services. And how does RSA know that
you're fulfilling your contract to provide core services?
Because that's what comes up on your checklist. Well, of
course, you report annually on your 704 report. You have
goals set and goals met. And so this is provided and the
number of ILPs and ILP waivers. That's all put together as
part of that.
And then they review the consumer service records
themselves as part of the compliance review. Typically,
that's quite a few records, 20 to 40. Some of them new,
some of them closed, some of them carryover. They do a
sampling of that. But they pull those themselves. And they
will compare your CSRs to your 704 data. And if they can't
see how it all fits together, they may come back, you know,
and say: Want. We can't see that your 704 data is actually
coming from your consumer service records and what you do
there.
So that's is always going to be there if you can't
make it come together.
There is a link here for you to use to actually pull
the CSR review form, too. It's not on the checklist,
itself. It's a separate form. And it's not -- it's not
over all. It's record by record.
And so they would -- if they review 20 of them, they
would have 20 of these forms, one for each record that they
review. You can use that for your own individual file
review. It's a very effective tool for you to see what is
it that they are expecting to see when they look at those
CSRs, and you will be able to kind of check those off as you
go through.
Now, let's look at the next slide.
Another good tip is if you copy excerpts from your
consumer service record from your review files that show
things that you want to show the surveyors or for your own
review make sure that you have a signed release of
information to pull that out for review or redact the name
or names from the excerpt, so that the file folders that
you're using for the review are still -- are -- do not
contain confidential information. Because that's a little
different than the reviewer actually is seeing in the
consumer service record, because you're putting it in
another file you're probably not put protecting the
confidentiality of those files because they're sitting in a
conference room waiting for the reviewers to come in, so
just to protect the confidentiality of that you want to make
sure you have that covered.
If you redact the names in the file folders where
you're dropping this information. Oh, I can prove we do all
four core services because here are examples, if you redact
the names for that, you probably want to keep a list for
yourself, so that you don't forget, because they may ask you
to pull the file that has the original information. And you
don't want to scramble and appear not to have an original.
You want to know exactly where you got the information that
you put in there for them to review hope that makes sense.
Now, that's the quick overview of the documents that
they will be looking at as a part of the checklist.
Are there some questions related to this?
>> TIM: On the instructions for the Q&A sessions then we can
give the questions so far.
>> WES: If you have a question or comment please press seven
or Q on your keypad.
>> TIM: Okay, and while we wait for some of you to queue up
and on the phone, let's go to the web.
Steven Johnson is remarking that they just had their
RSA review. And Paul, he's pointing out you won't know what
files they will pull until they come in so how would you be
able to redact information?
>> PAULA: Oh, that's -- you're redacting information on the
files you set up for them. That's a great question, Steven.
So you've got two things happening. Yes, absolutely,
they will pull whatever CSRs they want to review, but,
remember, you are also setting up your own folders, answer
to each checklist question. And in those folders that
answer each checklist question, you will have probably some
of them that have that information regarding those files.
Does that make sense? So in those, that's where you're doing
the redacting is in that information itself.
>> TIM: Okay, thanks, Paul A.
So we have another question on the web from -- excuse
me while I get back to it. (Inaudible). And (inaudible)
includes a link to the RSA checklist, and there's a number
on that page. And so Paula, can we help her and everyone
else figure out exactly where to go once they're on the
monitoring of the IL programs page?
>> PAULA: Yes. We can. And probably the best thing to do,
since I'm -- my Internet isn't attaching that fast enough would
be to do that at the next break. So I'll find out while we're
talking, and we'll get back to that in just a second.
>> TIM: Okay. Sure. All right. Thanks. So we'll address
exactly which link on that page to go to during the next break.
And we'll come back to the web for now, let's go to Wes and see
if there are any questions waiting on the telephone.
>> WES: Wes yes, there is one question from Gayle Taylor.
Gayle, the floor is yours.
>> FEMALE VOICE: As far as assessing consumer satisfaction, I
need tips on how to do that as far as maybe like a sample survey,
or if it's not through a written survey, how to do that best.
>> PAULA: Okay. You know, that's probably a separate topic,
but let me give you just a couple of ideas about it. You are
required to do some kind of consumer satisfaction. Sometimes the
SILC in your state or your designated state units, your
department of rehabilitation, sometimes they will help to offer
ideas for that. So if you have a state association, or you have,
you know, connections with your SILC, there may be some specific
things, some state-specific thing, but just in general, a couple
of tips.
One is that, you know, a lot of people are still using
mailout -- mailout surveys, and if you want a good return, a
lot of times you're not getting as good a return, as
meaningful information on those mailout surveys.
The number of questions that you ask also affects the
return. So a lot of times you want to ask some real basic
things: Did we listen? Do you feel that the goals that we
wrote down reflected what you really wanted to say? You
know, some of those things that are really foundational.
Were you treated with respect? Do you have any
suggestions for how we could, you know, better serve you?
Those kinds of things.
So does that make -- make sense?
And then -- then you may want to think about doing a
point of service survey.
And I bet everyone who's driven through at ttack oh
bell or bought something at Best Buy or whatever, at the
bottom of your cash register receipt, there was a link, and
you could enter to win a contest or whatever, but you could
do the survey on what you just got, whatever that was is and
that's probably a bigger survey than we can answer in
detail, but hopefully those will help a little bit.
>> TIM: Okay. Thanks. Any more questions on the phone. Wes
Beverly David. Beverly, the floor is yours.
>> FEMALE VOICE: Yes. I do have a question. My question is,
I went online to try to find the list of questions that will be
asked. And it didn't really seem like a list.
>> PAULA: Okay. Let me tell you what you see at the page that
you get to there. You will be monitoring independent living
programs at the top of that page. And this will be in the
transcript. So we'll have this, and you can look back to it. So
I'll give you the instructions fairly quickly here.
But at the very top of this page that we gave you the
link for, the top one is monitoring, and you can actually
look at some Monitoring Reports if you want to. But as you
look through the compliance issues, the IL monitoring and
technical assistance side, and then the Centers for
Independent Living onsite review guide, the ORG. Is the
document that we're talking about today. So it's about four
sections down on that page. Pa.
>> FEMALE VOICE: Okay. Hold on just a second. I have that.
Okay.
>> PAULA: And it's available both in a PDF and in a Microsoft
Word format.
And that is the actual checklist.
Now, it may change, but that's -- we're covering the
one that they do now. If it changes, it will also change on
this side. --
>> FEMALE VOICE: Okay. So if I -- 'cause like I said, I've
pulled up the thing, and it does say monitoring of independent
living programs. And then I would just go through -- click on
each of these and it would give me what the questions are, I
guess?
>> PAULA: When you go through -- when you go through that
checklist, the beginning part of it is a lot of narrative.
>> FEMALE VOICE: Okay.
>> PAULA: And that's the part we just went through about what
documents and who you want there.
>> FEMALE VOICE: Okay.
>> PAULA: And all that kind of stuff. And now we're going to
start the actual checklist part.
>> FEMALE VOICE: Okay. Thank you.
>> PAULA: You're welcome.
And that kind of answers the previous question as
well, I think.
>> TIM: It does, thanks, I believe it does. Looking back at
the webinar, we've gotten a similar question about how do you
protect confidentiality if files are pulled randomly? And John
(inaudible) one of our participants has offered that their
confidentiality statement actually provides that they are allowed
to share information in the case of a review by contractors. So
just a suggestion that you might consider that. Paula, is that a
good idea to include that?
>> PAULA: Excellent. Yes. And so when you actually look at
the information that you give to somebody when they -- when they
enroll in services, that would include a confidentiality
statement. And you could put that provision right in there.
That signifies things when the reviewers are onsite. Now, you do
still want to be very respectful of the files that you're handing
them. You may ask them to be in a specific room to review them
and ask them to lock the room if they leave, or you may -- you
know, you may want to look at how the conference ream is set up,
if they're working in a conference room. But you will want to
take a look at that, also, the physical safety of those files,
and make sure that they're kept confidential during the review.
Because if -- if you don't show your interest in that, they may
think that you're not concerned about it. And you need to be
concerned about it even with your reviewers.
>> TIM: Great. Okay. Well, those are the only comments on
the webinar. So, Wes, let's continue if we have more questions
on the phone.
>> WES: Corey Hines. Corey, the floor is yours.
>> MALE VOICE: Thank you, real quick. As an employer of
employees, that is, prevent you from asking disability status
questions. What is the best approach to obtain that information
from the staff roster, including about (inaudible) status.
>> PAULA: Okay. This would always be a self- -- a
self-disclosure. And you would be -- you would never ask the
question before the person is hired. They may volunteer it if
they understand independent living but you would not ask the
question typically before it's hired. But then you would give
them a -- in your documents that you're having people fill out
anyway, you know, enroll nG health insurance and all the other
pieces that people do, as new employees, one of the things that
you would do is just have a voluntary disclosure form. And in
that voluntary disclosure, they would just answer the question:
Do they identify as a person -- identify themselves as a person
with a disability? Yes. No. That's the simplest way to do it.
>> TIM: Okay.
>> MALE VOICE: Thank you so much.
>> TIM: All right. Any more questions on the phone.
>> WES: No further questions at the time.
>> TIM: Okay. Oh, one more question before we go back to the
presentation. Paula, (inaudible) is asking if there's a format
or maybe a sample of self-disclosure forms.
>> PAULA: I'm sure we can find one. (Laugh).
>> TIM: Okay. We'll try to put one together and share that
with you all.
>> PAULA: Right.
>> TIM: All right, well, thanks so much, you all, we will have
two more Q and achl sessions including at the very end of the
program but for now I'm going to click to the next slide. That's
Slide 17, and turn it back over to Paula.
>> PAULA: Okay. Thanks, Tim. All right. Great questions,
everybody, thank you for your participating in that. It makes it
solided interesting and we really appreciate that. Okay, from
here on out we're going through those actual checklist items. So
remember when we said we were looking at the RSA document the
beginning part of it is how to set up for the survey kind of
thing. But now we're actually looking at the checklist part of
that same document.
And we're going to give you the text from the
checklist on the slide, and then we're going to talk about
it.
If you don't meet that requirement, RSA will cite you
with what they call a finding.
Now, a finding means you must include it in your Plan
of Correction.
So when you finish the survey, they will send you a
report, and that report will say: These are our findings,
and any of those findings, you have to say what you're going
to do about it.
That is different from a recommendation.
And you will find that when they use the word
recommendation it is a suggested practice. And it may be in
your report, but it's not a finding, and so you're not
required to correct it. And you're not required to tell
them what you're going to do with that.
So, now, a finding -- a recommendation then indicates
a suggestion that you might find useful, though, related to
that section. And sometimes it tells you a little bit about
a finding, as well. So just kind of keep that in mind as a
little tip. Indicates a suggestion that you might even be
used -- useful to you as you do your corrective action in
another section.
Okay. Let's start that checklist.
Next slide, Tim.
So, the first item in the checklist is the grantee is
an eligible agency. It is -- an and eligible agency is
defined as consumer-controlled, consumer-based,
cross-disability, non-residential, prit, nonprofit. And of
all these things here, the one that is we see most often
that tend to be questioned are the cross-disability -- well,
let's just go through each one of them first. The
evaluation standard one then on the next slide.
So consumer control in management, establishment of
policy and direction of center. They're going to look for
evidence of that.
So as you're preparing, you need to ask: Well, how
can I show that I have consumer control in management? How
can I show that I have consumer control in establishment of
policy? How can I show that consumers direct the center?
So ask yourself that question. And you should be able
then to go back to your 51%, but there's probably something
more here. So you're probably also looking at how did you
get input from persons actually receiving services, not
just -- not only people with disabilities who are on the
board or in management or staff, but also the person's who
receive direct services.
They are also going to look at self-help and
self-advocacy as a part of your philosophy.
So they will look for situations that all of us know
happen sometimes where staff might be helping, and helping a
person help themselves. So when you do your own review you
want to ask yourself questions about that. Okay. Can we
show that this is self-help and self-advocacy.
They're going to look at what model you use for peer
relationships, and you should be having some kind of
development of peer relationships and peer role models
they're also going to look at equal access, equal access to
all services and programs and promoting that equal access
out into society, not just within your center but also in
your community both public and private, how do you help with
that.
Now, the items -- the next slide on that. The items
verified in that checklist that they look at are the number
of persons on the governing board and the number of persons
on the governing board with a significant disability. And
it has to be over 50%.
How do those Board Members disclose that they have a
disability is also part of that.
And another part of it is: Is the board the principal
decision-making body? Hm.
Now, a tip for you is: Some of this will be in your
bylaws. It might be in policies and procedures. You might
cross -- but then this whole issue of: Is the board the
principal decision-making body comes with more than you
might think it does.
So they're asking at that point: Is the board just a
yes board for an Executive Director, or is the board really
keeping minutes, making decisions, voting?
And you may want to look, when you look at those --
pulling those board minutes, you may want to look at
highlighting some things that show that the board is the
principal decision-making body. Some of that would be that
they voted to approve things, like the budget, the audit.
You know, other things that you would see as real keyboard
decisions, but they would also -- you would want to show
that they're actually are policies and minutes that back up
making the decisions and not just saying yes to whatever's
offered to them. Anything you have that they discuss a lot
would be great to include in that because it shows that
they're make -- that they're talking it over and making
decisions.
Sometimes we recommend that -- sometimes we saw
recommended by the -- I'm sorry, I lost my train of thought
for a second.
Sometimes we saw, recommended by the RSA team, that
this be in written policy. That the board roles be
distinguished in writing and that this be considered during
the recruitment and that there be recruitment procedures
written.
Now, these are, remember, suggestions. These are not
things that people have to correct. But they are things
that come in along that line.
Now, on this issue of a significant disability, we --
one of the things that I observed happen with a specific
review was that the reviewer questioned whether or not the
Board Member has a significant -- had a significant
disability, that word significant in there.
You know, they don't really get to question that.
That's self-defined. You need to make sure the board
understands what a significant disability is, and that's
defined in the Act. You go back to that and provide that to
them. But nobody gets to say for somebody else that it is
or is not significant. If it's affecting your life on a
regular basis -- um -- you know, then -- then it is
considered significant.
And as I said, that's actually -- you can find all of
that actually in -- in title seven and also in Title one, I
think, I'd have to look that up for you.
But the language around significant disability is
there in the Rehab Act.
And then from there it's up to the board to
self-disclose it, and, you know, no one will second-guess
that decision if they understand what significant disability
is.
So -- so you'll want to make sure that you take a look
at that.
Okay. Next slide. They also want to see that 50% of
your -- over 50% of your employees are in decision-making
positions are individuals with disabilities.
And this is something that once in a while I'll still
run across a center who's not really aware that this is also
part of the package.
If you have only one person in a supervisory type
decision-making position, and that's the Executive Director,
if you only have one position like that, then that person
must have a disability. If you only have two positions like
that, it has to be over 50%. So both persons must have a
disability.
If you have three positions like that, three -- two of
the three must have a disability.
So, hopefully, that makes sense to everybody. But
that's in the decision-making positions.
So that's defined probably somehow in your
organizational chart or in your -- in your job descriptions,
who would be those decision-making persons, but you'll want
to think that over if you're not sure that that's clear.
And then over 50% of the staff positions are also
filled with individuals with disabilities.
Now, sometimes in the reports that we've seen, we also
see comments around the make-up of the board related to its
diversity. They want to see diversity, not just with racial
and ethnic groups, although that is part of it. They want
to see that you're bringing in those traditionally
under-representative or under-represented or underserved
folks. But they also want to see that -- that it's
reflective of the community. That your board in some way is
reflective of the community. So diversity of disability,
racial diversity, ethnic diversity, sometimes will show up
in recommendations in the report, which, as I said, are not
the actual standard themselves, but gives you a sense of
what they're looking for as they're looking at that
information.
The next area that is in that philosophy section on
the next slide is the self-help and self advocacy.
And they usually look at the consumer service records
to find this.
And so, remember, you were going to talk about which
samples from records you put in the file folders to talk
about self-is there vocation and self-help? That would be
one of the things you could use for verification.
Another would be what consumers are interviewed, can
they indicate ways that they are learning to advocate for
themselves.
So you might think about those -- those two as a way
to look at that self-advocacy and self-help.
In the next one is the development of peer
relationships and peer role models on the next slide.
And it talks there about how you promote the
development of peer relationships and peer role models among
individuals with significant disabilities.
Now, one of the things that we find is that center to
center, not everybody does peer -- you know, peer
relationships or peer role models the same way.
But if you have groups, and you want to show them what
those are. If you have other peer-to-peer relationship
options, you want to show what those are.
A tip would be this: That if you when you have having
convened groups you might want to put that in notes in your
CSR but other things that you might learn about or help set
up, any time that there's appear to peer relationship that
can be seen as part of your peer support. And you want
to -- or peer counseling, and so you want to take a look at
how are you documenting that? Because a lot of times we
document other things, but we don't do a very good job of
documenting this particular piece and what's happened is
sometimes we've had centered reviewed who will ask the
question about the -- you know, what -- they'll ask the
question about this pier relationship issue. And they'll
say: Well, we're not seeing it in your documentation.
We're not seeing it in your notes.
And so we question whether or not you're even
providing that core service.
So you want to make sure you have good records around,
you know, around that issue.
So that's just a harder one to document. Okay, next
slide. Equal access is one of those philosophy issues. So
they're going to look here at your communication. And they
have some experience with, of course, the policies that
you're offering to them, but also there's other written
materials in the area. Do you have them in alternative
formats?
What do you do for communication? Phone communication
with people who are deaf? And they still have T DD and TTY
on their list but you also want to look at video and text
and other things that you do. Pictures for non-readers, you
know, when do you use those, how do you -- how are
interpreters engaged? And when are they available onsite, or
are they available by appointment and you know, can you show
that you arrange interpreters when they are needed for any
kind of communication.
They'll look at physical access. And that's going to
be true to all your programs and services, even if you are
operating them in another site.
So if you have a history and philosophy piece that you
do at the Veterans Administration, at, you know, hospital
across town, then you still want to be able to show them
that there's physical access. Of course, that particular
location has probably very good access, but that might not
be true of other places where you might offer a program or
service.
So is there physical access to any program or service
that you offer? Also, they'll look at signage, they'll look
at, of course, the doors are always a big issue, do they
meet the ADA regulations on the ease of opening the doors
or getting in the doors. Parking, bathrooms, you know,
any -- and they specifically are looking right now for the
policy and signage related to environmental illness on
multiple chemical sensitivity.
We do have some samples for you of some of that
signage. But they are looking specifically for signage
related to that.
And a policy, too, but they are looking for signage as
part of the equal access, and that's being cited if it's not
in play. So you'll want to keep that in mind.
And then what other reasonable accommodations do you
offer? Other interpreters, readers, personal attendants for
certain situations or activities, and you'll want to be able
to describe all the things you do in equal access.
Now, the next one is advocates for and conducts
activities that promote equal access, and then that again is
the sites that you use in the community. How did you
advocate so that they are accessible. How are the programs
and services that they wish to access accessible? And in the
community.
So, assisting consumers with that advocacy.
And anything, of course, that you'd provide must be.
But things that other sites that services provided to the
consumers that they want to access, how do you advocate for
those as well.
Now, if you have news articles or web postings, or
notes in the consumer files, those are good ways to show
that you've advocated for this. So sometimes a specific
person will come to you, and they'll say: I want to attend
this class, and it's being held in this location, and it's
not accessible. Can you help me with what I can do to -- to
improve that accessibility? That would be in your consumer
file.
Sometimes, you know, you're going to compliment
someone for, you know, how they've become accessible. So
you can send them a letter thanking them for making the
changes, and a copy of that could be in this file. You get
the idea.
And if you help organizations through surveys, keep
copies of those surveys of community sites that you've done
and any correspondence you've done around advocating for
better access. As part of what you can do to show that you
advocate for and conduct activities that promote equal
access.
Okay. And that's the philosophy piece that's covered
pretty extensively during your survey from RSA and that is
foundational, of course, to who we are as centers.
And it's time for another quick question break.
>> TIM: If anybody is ready for a question or comment please
press seven or Q on your keypad. Beverly Davis. Beverly, the
floor is yours.
(Pause.)
>> WES: Beverly, if you are on mute, please unmute your phone.
>> FEMALE VOICE: Hi. I had a question earlier, but that
session ended for the questions. And I think my question was
pretty much answered anyway. Thank you though.
>> PAULA: Thank you, Beverly.
>> WES: The next question comes from Teresa Torres, Teresa,
the floor is yours.
>> FEMALE VOICE: Hi, I have a couple of quick questions about
the first session. The first thing had to do with the original
applications, and Paul a you spoke to the fact that RSA may hold
centers to what they put in an application maybe 20 years ago.
Um -- and said that they needed to have copies of
whatever communication may have been to -- in support of
those changes. And yet on one of the slides it speaks to
the fact that when one submits 704 reports, that's one of
the ways that RSA verifies, you know, you're compliant.
So is there a particular reason why maybe 20 years of
704 reports that specifically identify the changes, if those
are approved by RSA, does that not imply their approval? If
they've been submitted maybe 20 times?
>> PAULA: Well (laugh). You know, I can't speak to how they
specifically read that, but I don't believe that there is
anything in the submission of those reports that indicates that
that's a change or even indicates that they've approved them.
>> FEMALE VOICE: I think that when you get your funds, you
know, because we're told you have to submit these 704 reports, so
that we can review them. And then after you've done that, we'll
notify you about your funds for the next year. So, you know,
we've always assumed that that's certainly an implication that
that -- that -- in fact, I don't think that the stipulation about
requiring review of your original application was in the review
document until a few years ago.
>> PAULA: Well, that could be. I'm just reviewing it as it
now stands.
>> FEMALE VOICE: I know, I just thought folks should know that
the 704 report doesn't really apply, I guess.
Another quick question is: Do you happen to know if
the VOC rehab agencies, which, there's certainly a lot more
money going to VOC rehab, do you happen to know if they have
to comply with it and if they follow up.
>> PAULA: I don't know, that's not my area of expertise.
>> FEMALE VOICE: Okay. Thanks.
>> WES: Nancy. The floor is yours.
>> NANCY: I guess a lot of our cases and work are now done on
the computer. And it's -- there isn't a paper trail. Do you
just hand over your computer to them or how does that work when
they come out?
>> PAULA: Well, there's not a paper trail, but there is some
kind of a summary document, isn't there? Or some kind of a record
of what's happening.
>> NANCY: Only on the computer. Case notes, and intake
applications, and.
>> PAULA: Uh-huh.
>> NANCY: Goals and services and everything is done on the
computer.
>> PAULA: You know, that's something you would need to discuss
with the reviewer during that 30-day period while you're
preparing for them. Some reviewers are fine with just sitting at
the computer and seeing the record in that way.
>> NANCY: Okay.
>> PAULA: And I believe one of the -- one of the participants
mentioned in the public chat that when we have had reviewers here
we provided them access to our data collection system and our
contract notes -- our contact notes and established a log that
was strict and they could only review and not edit and delete.
And we provided that, you know, so that center set it up that way
so that the access was view only.
And certainly, that's acceptable to many of the
reviewers, but if the reviewer needs it in some other
format, then, of course, as an accommodation, you would need
to provide that to them for the records they want to review.
>> NANCY: Okay. Just wondering how they would choose their 20
or 40 or, you know, how that would be done at that point when it
is -- um.
>> PAULA: When it's electronic. Sometimes you'll print out a
list for them, and they just check off: I want this one, this
and this, you know.
>> NANCY: Okay, okay, thank you.
>> PAULA: Uh-huh.
>> WES: The next question comes from he will lore Williams,
Eleanor, the floor is yours.
>> FEMALE VOICE: This is actually Marsha with Eleanor, and the
question that we had that came up relates to decision-making and
a site review that we were on where the question that came up and
the definition that you shared, the definition seemed obvious,
really, related more to supervisory capacity and roles. And
the -- but the center was questioning that, using the definition
and CFR and saying that for some positions that had -- um, the
staff person might not supervise others, but they might run
entire programs or run a branch office at another site and have
other decision-making capacity.
So I just wonder the if you had encountered that
before.
>> PAULA: I mean, I think you could make that argument.
Typically, though, it's the people who actually are in
supervisory positions. But I think you could make an argument if
they're independent and they're in another site, I'm not sure
exactly how RSA would respond to that. We might have to ask
them for clarification there.
>> FEMALE VOICE: Thank you.
>> PAULA: Uh-huh.
>> TIM: All right. This is Tim. I'm going to just jump back
in and make sure we stay on time here. I realize there still may
be a couple people in the queue. If there are, please write down
your question, we actually have two more Q&A breaks remaining, I
know I said that last time. We actually have three, so we have
two answer question and answer breaks, and let's go ahead to the
presentation, I'm going to click to Slide 27.
>> PAULA: Okay. Great. The next evaluation standard,
standard two, has to do with the provision of services, and they
look here at making sure that you're providing those services
across a range of significant disabilities, and that your
services are cross-disability, and that eligibility is
determined, regarding that the person has a significant
disability. Not a specific single disability but a significant
disability of some sort.
Now, that's a really interesting piece, because, of
course, our -- our eligibility determination, like what we
were talking about with the board, is self-disclosure.
So, when the person's eligibility is determined, it's
determined through self-disclosure. We're not requiring a
medical review or whatever.
And the disability, a single disability is appropriate
for one portion of the services, only if it's unique to that
service, such as Braille instruction for persons who are
blind is unique. That can't be the only thing a center
does, but, of course, that could be used by a specific
single disability for that one service or that one unique
portion of the services provided.
So, next slide.
Let's look at the evidence that services are
cross-disability.
So, one of the things they expect to see is a wide
range of disabilities identified in the 704 report, and that
during the time that they're onsite, the people that they
need are people with differing disabilities, the people who
are coming in and out of your center your whatever it is
that's going on, the days that they're there, that those
folks would represent differing disabilities.
They would also want to see that IL core services are
provided to every disability so that you can show -- you can
show in the records of different people that they are
receiving the core services.
And then you need to be able to show how you're
reaching out to members of populations that are unserved or
underserved.
Now, how you determine who is unserved or underserved
may vary a little bit from center to center. Some of that
information you may get from your statewide independent
living council, some of that may be local information that
you've received, but as you're looking at who is unserved or
underserved that can be disability-specific, that can be
neighborhood-specific, that can be ethnically-specific. But
take a look at how you're reaching out to members in your
community who would be considered unserved or under-sfshed.
Most of the time you've identified that somewhere in your
planning process, and so we'll come back to that when we
talk about the plan.
And then your brochures, your policies and your
practices are clearly cross-disability. So these are the
things that they expect to see.
Now, related to practices are clearly
cross-disability, again, remember, they would expect then to
see people coming in who have different differing
disabilities, so that's -- that's an important thing to see.
Now, remember the folks that you serve according to the
title seven must be people with significant disabilities.
But, again, they would determine for themselves what that
word, significant -- whether or not they meet the term
significant. And you can find the language around
significant disability in title seven. And we will also
make sure that we put that up with -- when we post this,
we'll -- we'll put up that definition for you.
Because I know that that sometimes kind of trips us
up.
Okay. Next slide. The next thing that they'll be
looking for is independent living goals.
So, this is one of those areas where they will look
for the goals whether or not the person has chosen a plan.
So the center -- the standard is, the center shall
facilitate the development and a chrechment of IL goals
selected by the individuals with significant disabilities
who seek assistance in the development and achievement of IL
goals from the center.
That's what the standard says.
The next slide will talk about a little bit more what
that might look like.
One of those -- one of the evidences regarding goals
is that the person has a consumer service record or SC SR
and that's true for each consumer served who receives
anything other than information and referral services, that
there would need to be a consumer service record, typically.
And that that record includes documentation showing that
they're eligible or ineligible for services. And typically,
that document is signed by the consumer or staff, following
your own policy, related to their disability.
So you probably have a policy that says that the
person self-discloses, and you probably have some entried
documents, one of which would be a document that they would
sign, indicating that they do or don't want a plan, that
plan or written waiver that's down a couple of notches there
in this list, but also might include whether or not they
disclosed that they have a significant disability. And then
they can choose to tell you what that disability is or not.
That's why the 704 report allows for specific disabilities
to be identified, but also, there's, you know, other
disabilities.
And only those eligible are served.
And that is actually a part of what they're looking
for as they look through this specific area.
And we have had some centers who had kind of an Open
Door Policy in their neighborhood and had some reasons why
other people who might not have identified as having a
significant disability might want to come in, like bus
passes or other kinds of, you know, access to some other
services.
And -- and they were questioned because they were
considered to be serving people who did not have a
disability. Because they didn't have -- um -- an indication
that they did. So, interesting, huh?
Um -- so take a look at that one.
Now, in your -- as you look at this evidence, let's
look at the next slide.
Yeah. So you're going to have either a written plan
or a written waiver signed by the consumer stating that they
don't need a plan, but if you have a waiver, you still have
to write down the plan.
So don't forget that.
So you have a record, the record includes what the
plan is, even -- what the goals of that person are in their
own words. And those goals are written down even if they
waive the development of a formal independent living plan.
So keep that in mind.
And the next slide, here are some of the pieces
related to your consumer record review. So they would look
at eligibility. Does the person have a significant
disability? And is that determination signed and dated? Who
signs it is up to your policy but we suggest that you have
the consumer sign it because if the staff person no thing it
there could be a question of whether or not you're doing a
diagnosis as opposed to letting them state for themselves if
they have a significant disability.
So that would be signed by either one. We would
request that you have the consumer do that. But either one
is acceptable, based on your policy.
What services do they want should be listed.
Sometimes people will do an intake document that will pick
up all of these pieces in one document, as you're doing the
first conversation with the person who's requesting services
and as we all know sometimes that -- what services are
requested will continue to evolve as they realize more about
what you have or you realize more of what you might suggest
that meets something specific that they're wanting or
needing and they need to have a waiver of their independent
living plan and if they sign it it needs to be signed by
either the staff member or the consumer. And then what
services were provided. And evidence of the four core
services needs to be part of that. Because we have had
centers cited for not providing all four core services,
because the reviewers could not find evidence of those in
these records.
So keep that in mind. And then the goals and
objectives established with the consumer, whether or not
they're in that ILP is not a list of services, but it's the
goal the person wants to accomplish.
So if they -- you know, if they say to you: I can't
afford where I'm living, I need a place that's affordable,
then, affordable is what you put down, even though there may
be more that develops -- they want to be close to the
college campus, or, you know, some other things might emerge
as you discuss that. And you might change that.
But these are -- what are the goals and objectives
that are established that the person wants. What do they
want to accomplish?
Okay. Let's look at that next slide.
Now, you also will want to identify, does the
person -- does the consumer believe that they've achieved
that goal or objective? And what did you do to assist in
that?
And you need to review that with them at least
annually.
And then decide with them, of course, whether to
continue to modify, discontinue or refer the -- to someone
else for those services.
So, as you look at that consumer service record and
how you reflect what the center does with the individual
consumer, that's a lot of information that you want to put
in place.
So -- so keep that in mind.
And then signed releases for information. Now, some
of the compliance reviews have also required signed releases
for photo or media. Probably they've seen a photo -- seen
photos used by the center on their website, in their
newsletters, on the brochures or, you know, on their walls,
and if there are photos out there, then you're going to see
that the compliance review may say: Where is your photo
release or your media release. So your signed releases of
information are not just for file information, but they may
also be related to photos and other things.
So...
And you're required to have notifications provided
regarding satisfaction surveys that they -- that they have a
right to assess the services.
They're consumer -- you know, their process for
appealing through the cap so their appeal rights. Alternate
formats, the right to alternate formats and communication
modes and that would be part of what you need to tell people
as they begin services with your center. So hopefully that
makes sense, too.
All right. Next slide. Some specifics about what
they're looking for when they look at an independent living
plan. They're looking to see that you indicate goals and
objectives that are established. The services provided to
meet that goal and how long you anticipate the services will
take.
So if there is a plan, these are the elements of a
plan. So now one of the things that -- that you want to
make sure is that the plan is developed completely and that
you can show that by having that plan signed by the
appropriate staff member and the individual.
So how is it that you make sure that people are
involved in the process. And the signature is the
easiest -- of course, interviews might also tell them that,
but the signature is one of the easiest ways to do that.
And then accessible formats is needed and that they're
reviewed at least annually again to determine whether
services should be continued, modified, discontinued, or
whether the individual should be referred onto some other
program.
Now, this annual review, just so you know, a lot of
times when the -- when the reviews are happening, when RSA
is doing a review, and they're pulling out the number of
files that they look at, sometimes they're seeing very
little activity in some of those files, and that does bring
into question the numbers, sometimes, on your 704 report.
So if you're carrying someone as, if we want to use the R
language, an open case, and -- and you're not reviewing that
at least annually with the person, to say: Do you want to
keep going? You know, is there anything we need to change
scr are we done? -- um, if you're not doing that annual
review, and you're carrying those numbers over when you
don't actually know if the person wants to continue, this
raises a red flag during your review. So just -- um -- just
so you know.
And sometimes we're also seeing as a recommendation,
remember that's a suggestion they can't require you to do,
that you have written policies and procedures for how you
manage the consumer service record.
So we see that showing up quite a bit, that they're
hoping to find that, because it helps them to see how you do
all these other things.
So if you have it in written policies and procedures,
and you follow and implement those policies and procedures,
it will guide you through this process of annually
determining, for example. So, hopefully, that's useful.
Let's look at that next slide.
Here are some actual compliance reviews, things that
came up, that you might find interesting.
Yes, almost all the consumers waive having an
independent -- an independent living plan. The response
from RSA was: Well, then you need to retrain your staff,
and you need to make your policies better, because people
are not understanding the advantage of developing that
independent living plan. See what I mean?
So the consumers -- if most consumers are waiving
plans, then they probably don't understand that a plan would
be helpful. So you need to retrain and make sure your
processors present the advantages.
Another actual compliance review recommendation that
we've seen is that all records must include the development
and achievement of IL goals selected by the individuals, and
they have to be written down, even if the individual waives
the plan.
Another is that if the CSR does not clearly document
the services, they question whether the four core services
are actually provided.
So you should be able to show in records how those
services are provided.
Now -- um -- another part of that is if the consumer
is interviewed and doesn't understand what core services
they're receiving.
And, you know, that one's a little trickier, because
sometimes we don't use the same labels in our conversations
with consumers, because we're trying to focus on what they
say they want to have. And so we don't want to, you know,
clutter it up with our language, but really try to get to
what they want.
And we do -- we do want to do that. But if the
consumers interviewed don't understand independent living
philosophy, and core services, sometimes the review has
required retraining and developing of processes to assure
that staff communicates IL philosophy more clearly and core
services more clearly.
So, that's a -- that's an interesting piece, I think,
to look at there.
When you look at documentation, you need to take it
seriously, because you can see from some of these comments
that if the consumer record doesn't have the information,
then it's considered to have not happened.
So take the documentation very seriously. And we
suggest that you review your consumer records regularly.
Assure that the information is being collected. Because no
matter what your policy says, people get busy.
And if you don't keep your attention on this
information, then it may get lost in the shuffle.
And if staff are keeping their notes in a database
program or an electronic file, don't forget to review those,
too, especially if you don't print them out. Because they
are part of your consumer service record.
So if you don't print them out to put them in the
folder that you call the CSR, you still need to review and
make sure that those notes are reflecting the core services,
that they're reflecting IL philosophy, and that they're
showing what the progress of the person is and how that's
going.
And sometimes that means that you have to continually
remind your staff to complete the reports of any contact
that they have with the consumer so sometimes you have to
change. We get busy with what we do and we don't always
remember to monitor it. Monitor it now, correct it if you
need to, not just before your compliance review because
30 days prior to their arrival at your center is too late.
So you want to make sure that you make those corrections now
and that your monitoring now to see that your staff are
really doing it.
Now, the -- you're required to have paper copies of
some things. And actually, this is changing as I'm
speaking.
So, let me tell you how this kind of works.
The independent living plan needs to be written,
waiver signatures need to be on paper, and it's a good
practice to keep paper or hard copies of any signed
documents which might include other things, releases of
information, receipt of handbook policies, progress reviews.
This is one of the places that you would have that
notification and satisfaction surveys. We had a question
come up on the -- on the public chat.
In the system -- in the list of things that you
provide to the folks that come in to you for services, one
of the things you tell them is, we will be asking for you to
tell us about your satisfaction with our services. So that
they know to look for a satisfaction review and know that
they have the right to give you input on -- on what they
think of your services.
So it's a good practice to keep the paper or hard
copies of all those signed documents.
Now, just recently we had from RSA some additional
clarification on this.
And they said that you can have scanned documents with
original signatures rather than paper documents, but that
they still feel it's a good practice to keep the paper or
hard copy of signed documents, because they cannot tell you
what the -- um -- you know, the other people that you deal
with might want.
And so they suggest that you keep those original
signed hard copies for things like releases of information,
because it may be that that's required by the other entity
that you're working with, the other service or the other
program that you're working with.
So, to keep that in mind.
So, this is shifting, you know, as our whole society
is, to a more electronically-friendly system. And we did
have that clarification recently. But you can tell it's
with a bit of reluctance, oh, man, it's got a signature on
it, you probably need to keep that copy in a hard copy in a
file.
So...
Okay. Let's look at questions on those pieces.
>> WES: Again, the floor is open to your questions. If you
have a question or comment please press seven or Q on your
keypad.
(Pause.)
>> WES: At this time there are no questions.
>> TIM: All right. Well, given the time, let's get back to
the presentation, and we will do a final Q&A break before the end
of the call. I'm going to go ahead and click ahead to Slide 38.
>> PAULA: Okay. Great. This is evaluation standard four
about community options. So they look here that your standard
conducts activities to increase the availability and improve the
quality of community options for independent living to facilitate
the development and achievement of independent living goals by
individuals with significant disabilities.
So on the next page let's look at the compliance for
that indicator, the evidence of compliance for that
indicator.
And the evidence is that the CIL performed at least
one activity in each of these categories in the past year.
Now, there -- there are not lots of places where --
where you'll find this one activity in each of these
categories language. But that's what they're looking for is
evidence for indicator four.
So the first thing they want to do is they want to
know how can we show that you did community advocacy this
past year? And you need to think about that, pull together
the -- either the people that can be interviewed or the
documentation around how you did community advocacy? If you
were in the paper, that might be easy or on the evening
news, you might have a video clip. But whatever you --
whatever it is that you did related to community advocacy,
what is your documentation of that. And can you show that
you performed at least one community advocacy activity?
And then the technical assistance that.
>>STUDENT: Offered technical assistance to the
community on making services, programs, activities,
resources and facilities accessible.
So how did you provide that technical assistance?
Think about it. Can you come up with at least one activity
and documentation to show that that's true?
Public information and education. And they do not
elaborate on this in the checklist.
But typically, this is regarding, you know, the
abilitieses of people with disability. The people with a
disability of part of their community and living life. This
is about your services that would typically be the kinds of
things we see under public information and education. It
could also include information about ADA or information
about Homestead or information about other things that might
have an impact on the community's understanding around
independent living. So... aggressive Outreach to unserved
or underserved populations and that's the language.
Aggressive Outreach. So you have to think about what
constitutes aggressive Outreach. It isn't enough to just,
you know, say, you know, you're all welcome here. There has
to be something a little bit more.
So, aggressive Outreach, and they ask about minority
groups and urban versus rural are the actual language in
that checklist related to that. Okay?
Then they'll also ask about collaboration with other
organizations, because that can assist in improving
opportunities for individuals to a veil themselves of those
resources in that service area.
So they're looking at collaboration with, you know,
other services that you might have in your community, so you
might have a -- you know, a, an employment program in town
that people are -- are participating in and you're assisting
with, or there may be other kinds of things that you're
doing with -- with nursing home transition, with your --
with your area, and so what are you doing there, how are you
collaborating?
The next item, standard five, has to do with the core
services. And you can provide -- we have to -- we each have
to provide all core services, although we can provide
additional services, as well.
So, you have to provide all the core services. And we
have a lot of information on that. A lot of resources on
the four core services. In fact, you may find those very
helpful for your staff, especially new staff who are being
oriented to that or a review for you to take a look at it,
as part of board training, or some other ways that you could
take a look at that.
So, make sure that you are providing all four core
services, and that you know what other services you provide,
and that your staff are aware of those.
Now, some more tips on the next slide, related to
those four core services.
And kind of proving those.
You can identify in advance of the visit or for
yourselves and your own internal review which consumers
receive which core services. Some centers actually make a
chart. And they have the names of the people that they
serve, and they check off the core services and other
services that the people receive. Some print a list off
their database. Others mark the paper CSR, the actual
record, with colored dots, and so anybody who's receiving,
you know, information -- information or referrals, the one
that doesn't count here but anybody who's receiving
independent living skills, you could put a blue dot on their
folder and anybody who's receiving whatever, you can put --
you can color code it that way, and people could have
multiple dots on their paper folder.
Um -- what you want to do though is make sure, when
the reviewer pulls random files that they still see a
representation of those four core services. So how can you
provide them with a list of consumers for them to pull the
files from that helps them to do that?
So, that's our tip for doing that. You can't assume
that your records accurately reflect what services the
person provides unless you take the time to do that. Now,
in the sex slide just for a quick review, those four core
services are informational referral services to all
individuals who request this type of assistance and that
that's done in accessible formats, independent living skills
training, which you define how you do that.
Peer counseling, including cross-disability peer
counseling, and individual and systems-wise advocacy, and a
combination, as appropriate, of two or more of other IL
services.
Now, you can find those in the Rehab Act, but we also
put them on the next slide for you.
You have to do two or more of these other things.
So, Tim, if we can look at that next slide it inslides
lots of things that most of us do more than two of. But,
you know, you'll see some that are pretty commonly used.
Youth shows up pretty often. We see a lot of information
for other support services being provided and so forth.
So -- so you'll want to do at least two of those.
That's what they're looking for in the checklist, is
those four core services as defined on that slide. The
prior slide, and at least two of these other services. So
think about how you can show that and how you can show the
documentation in the records that those are provided.
Hey, getting close.
Getting close. (Laugh).
Evaluation standard six.
Resource development.
The center shall conduct resource development
activities to obtain funding from services other than --
um -- title seven of the Act.
So -- so what other services do you have that provide
information? And you need to show how you're doing resource
development activities to obtain those funds. Because
that's one of the evaluation standards they're looking at.
All right. Take a deep breath. We're down to
questions and answers again.
(Pause.)
>> WES: Again, the floor is open for questions, if you have a
question or comment please press seven or Q on your depad. The
first question comes from Kelly Brooks, Kelly, the floor is
yours. Kelly, your phone is muted, please unmute your phone.
Next question comes from Beverly Davis. Beverly, the floor is
yours.
>> FEMALE VOICE: Yes. My question is this: I -- ILPs,
individual living plan, and the goal plans, those are two
separate documents? Are they?
>> PAULA: We've got maybe three things here that could be
called something similar. The independent -- the ILP or the
independent living plan is a signed plan that the person who is
receiving services and the staff develop together and set out
goals for themselves.
>> FEMALE VOICE: Okay.
>> PAULA: If they waive that plan, that particular plan, their
goals still have to be captured somehow in the -- in the records.
So that you know and they know what it is they're working on.
It's not going to be signed, it's not going to be an official
independent living plan, but they are there for a purpose and we
all need to be clear on what that purpose is for them to get the
best benefit if from the center. So those still have to be
captured in writing as well.
>> FEMALE VOICE: Because I have like goal plans that we meet
with the consumers and they, you know, do exactly that. They
decide what they want to work on accomplishing, and they sign
those, but I was a little lost about the -- an actual form that
says independent living plan.
So.
>> PAULA: Does that -- does that plan include a target date
and who's responsible?
>> FEMALE VOICE: Yes. The goal plan does have all that on
there.
>> PAULA: I would -- I would say not having looked at it, you
know, so I may be missing something, but I would say that that
sounds like an independent living plan.
>> FEMALE VOICE: Okay. And then I have one other question:
When you talk about the reviewer's coming into the Centers for
Independent Living and wanting to meet consumers and so forth,
our agency, the basically we do have like different peer support
group meetings. We have, you know, various activities, but on
any given day, I mean, those are scheduled like so many times a
month, so-to-speak. So if like the auditors came in on like a
Friday afternoon or a Friday, let's say, there may not be
consumers in our building, because we often go out to the
consumers and are helping them where they are versus them being
here.
So how does that work? Do we say, oh, we're having
these meetings on this day. That would be the day to come,
if you want to meet people? I mean, is that how that would
be handled?
>> PAULA: You can do both. You can say to them: Well, during
your review time these things will be happening, that you can
observe. And that happen at the center. They'll give you the
dates and they won't probably fluctuate those dates based on your
calendar. But we're ugh suggesting that you also take the time
to make sure that they talk with the people that will best
present what you do.
>> FEMALE VOICE: Right.
>> PAULA: So if you have some specific folks that provide
services to that can best describe this, you need to make sure
that -- that they are somehow involved. Now that Mumbai phone.
It might be that they want to write a letter to the -- to the
reviewers, and tell them what they think. It may be that they
want to come to the center and interview with them.
>> FEMALE VOICE: Okay.
>> PAULA: You would arrange that.
>> FEMALE VOICE: Okay. One other thing, and then I'll let you
go.
As far as the surveys go, I know our agency has --
it's like a quality assurance, quality improvement type of
form that the consumer no thing.
And basically, it's not necessarily a survey that says
I'm happy or I'm not. But if you're unhappy with something,
you -- here are the steps on, you know, getting that issue
resolved. So do I still need more of a survey that says: I
received this service, I'm satisfied, or I'd like to
receive -- see your agency provide X, and, you know, do I
need more of a survey form, or is my satisfaction review
form, you know, or application okay?
>> PAULA: Well, if I heard you accurately, and I'm not sure if
I D but if I heard you accurately, the first part is kind of like
informing them that they can give you feedback.
>> FEMALE VOICE: Right.
>> PAULA: The second part is actually soliciting that feedback
somehow. And you need to be asking some questions or giving them
some way to actually -- um, give you focused satisfaction
review -- you know, satisfaction information.
>> FEMALE VOICE: Now, should we do that periodically or like
if somebody accomplishes their goals and they're done with us, I
mean, at what point should you be doing those surveys?
>> PAULA: We see it both ways, and it's up to you. You can do
it quarterly. You can do it annually. You can actually do it
as -- as each service is provided. You could do it right after
the intake, and you could do it after the -- you know, after the
person decides to leave the program or says that they've
completed a goal.
>> FEMALE VOICE: Okay.
>> PAULA: Each time a goal is completed. We see a mix of
those things.
>> FEMALE VOICE: Okay, thank you very much.
>> PAULA: You're very welcome. Thank you.
>> WES: At this time there are no further questions.
>> TIM: Great. All right. Well, we have points from the
webinar. Let's see if we can get through a few of these before
we break, but a lot of you are still on. So let's go ahead.
Could you just quickly reiterate some of the rules
around satisfaction surveys, Paula? We have a couple
questions related to -- um, how often they have to be sent
out and what's required of them at the basic level.
>> PAULA: All right. Off the top of my head, I -- you know,
maybe Darrell or Richard can pop in here if they -- if they know
of a specific requirement. But off the top of my head, I think
annually is typical or at the point of service.
Um -- and that's typically what you have -- what you
see, you would not have to do it more frequently. I'm not
sure that the rules on this are really firm in my head.
Like I said, sometimes your SILC is wanting to collect
specific information to help develop your statewide plan and
so sometimes they will be involved in working with the
centers to have specific questions answered.
Sometimes you'll -- you'll create that yourself.
Sometimes you do more than one survey, but how are you
collecting satisfaction information? And how are you using
it? You would define it, but you ought to have it defined
and be doing it regularly.
>> TIM: Okay. Good. Good.
Um -- let's see. More than Ryan from Wisconsin asks
if the two additional services that need to be provided from
Slide 43, are they required to be provided with Part C
funds?
>> PAULA: You know, they're on the checklist (laugh). So,
yeah. The answer is, that's what RSA is going to be expected of
the centers they fund. They're going to be expecting the four
core services, and their checklist is worded the way that we gave
it to you on the slide. Which is a little different than the
exact way it's worded in other places, although you can find
that. But this is also in the Rehab Act.
So we gave you the reference at the end of Slide 42.
We gave you the reference to that list of additional
services.
Yes, the expectation is that centers that are
receiving those funds do the four core services, plus two
more.
>> TIM: Okay. Good.
A quick question, but it's helpful. (Inaudible) wants
to know if it's okay to serve individuals in an adjacent
County that is unserved by other CIL?
>> PAULA: You determine for yourself who are your unserved and
underserved folks, and the geographic question is a tricky one,
because if your original grant said you were going to serve, you
know, a specific County -- um -- you know, you were going to
serve Johnson County, and then you decided, oh, but over there in
the other County they need me, too, so I'm going to go over
there, there could be a question about whether you're using those
funds appropriately. Because the funds are for Johnson County.
So you would need to sort that out with RSA probably
and identify with them that you intend to -- to also provide
services in that County. So I would sort that out with RSA
or do it with other funds you know, but typically you would
need to stay with the geographic area identified in your
original application.
>> TIM: Great. Okay.
And there were some other questions on the webinar
from -- related to ILPs, but I saw some great advice from
Steven Johnson so I want to thank Steven for his advice,
that was good and quite relevant as you just went through a
site survey. So, thanks, Steven, for offering your
assistance to some of our other participants and at five
minutes to 5 we're going to wrap up here. I am so glad that
just a moment after our delay, the audio in the webinar
started working again, but it was disa pointing that we had
to delay the call. I want to thank you all for your
patience in dealing with that. And again, we are looking
into other platforms, so that we don't have to work through
technological problems like that in the future but thanks so
much for your patience, Paul a thanks to you for an
outstanding presentation today. And, of course, we'll be
back with you for Part two. Next Wednesday, the eighth. We
have the same connection instructions for both the webinar
and the telephone. So if you -- if you're registered for
one, you're registered for the other. We hope to see you
back. This presentation will be archived on ILRU's website
as an on-demand training within 48 hours. And so I
encourage you to review this information, to share it with
others. That's free, and we'd love to see it shared far and
wide.
I have gone to Slide 46 here, which is Paula McElwee's
contact information. As our technical assistance
coordinator at ILRU on the IL-NET project Paula is always
happy to respond to your questions, I am always happy to
respond to your questions, too, so if you think of something
whether it be in a few hours or a few weeks feel free to
reach out to either one of us. If it's a project and
program information like up-coming trainings you reach out
to me. If it's content about this training probably best to
contact Paula, but we're happy to support each other. So
ask either one of us.
I'm going to also go ahead here to the evaluation
form. Now, if you're looking at a printed copy of the
evaluation, you can access this in the confirmation email
that was sent to you. But if you're looking at the
electronic PowerPoint or if you're on the webinar you can
click that, that's a Live Link, it will take you directly to
the evaluation form. You'll see that I was telling the
truth and it is really -- it is very brief, but it's very
important to us, so please do fill it out. And again if
you're participating in a group that's great. But please
fill it out as an individual. We want to know what each of
you thought.
So thank you so much. Thank you to all of you for
being with us, this is a popular training, a big training,
we were happy to have such a big group. And we will see you
all at the same time three Eastern next Wednesday the amG.
Thanks so much, everybody, bye-bye.
>> PAULA: Thanks, Tim.
>> TIM: Thanks, Paula.
>> WES: Thank you. We appreciate your participation. You may
now disconnect your line at this time.

(Hanging up.)
(End of call.)
(3:58 PM CT.)

\*\*\*\*\*\*\*\*
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