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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