

**IL-NET**

CIL-NET · SILC-NET

# **Quality Beyond Compliance: Taking Charge of Your CIL's True Potential**

## **Using RSA's Review Checklist for Self-Assessment of Quality and Group Activity**

**March 18, 2014**

**1:30 p.m. – 4:00p.m.**

***Presenter:***

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# What is compliance?

From [whatis.com](http://whatis.com)

Compliance is either a state of being in accordance with established guidelines, specifications, or legislation, or the process of becoming so.

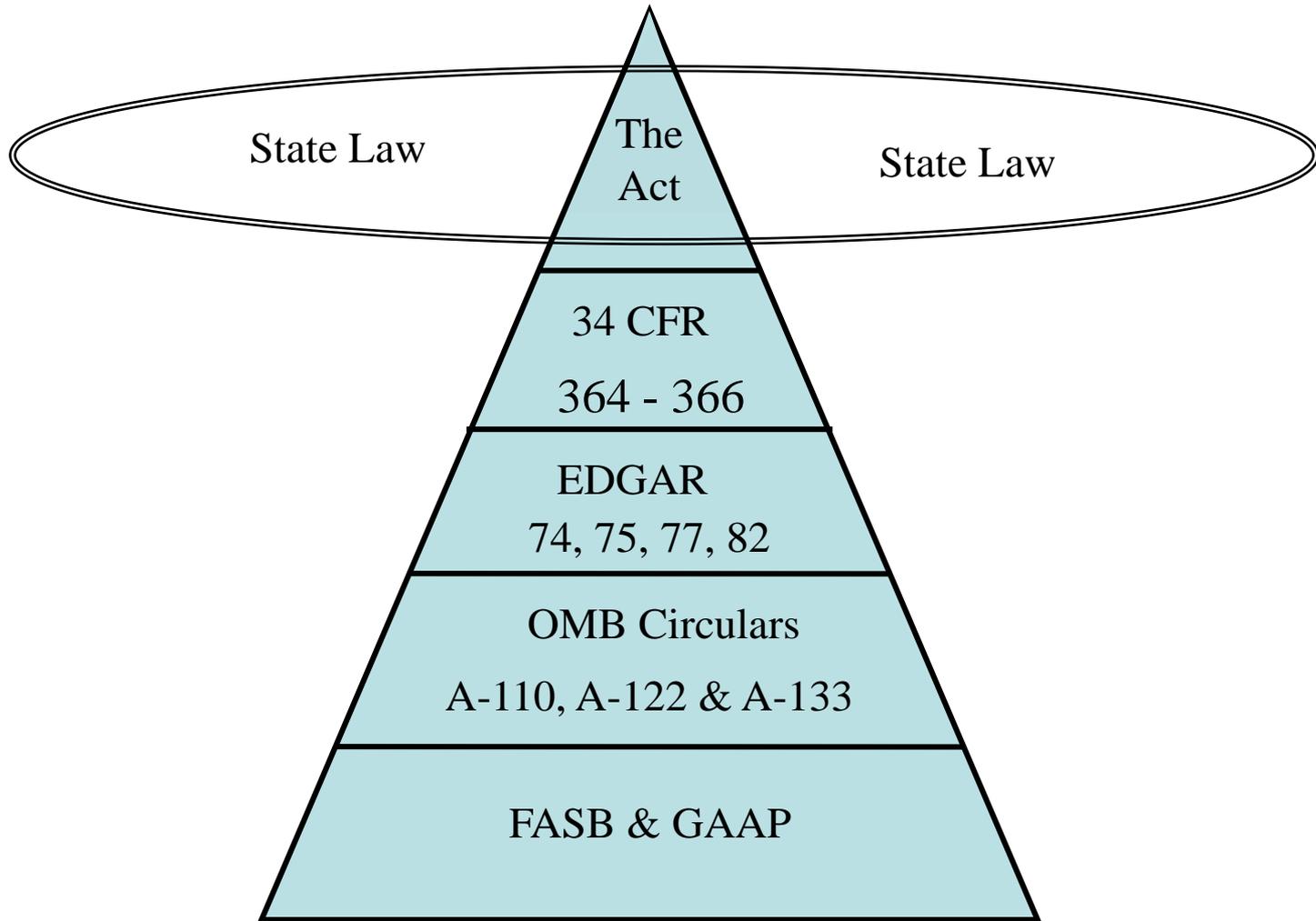
# What do we need to do to be in compliance?

Meet the regulations

- OMB Circulars A-112, A-122, A-133
- As expanded in EDGAR
- Which is part of the Code of Federal Regulations
- Which will soon be updated in the super-circular and reinterpreted in new regs which we may see by December of this year and apply October 1 of 2015 if all goes smoothly

Conform with your contracts

# Regulatory Agencies Plus



# We aren't going to talk about financial compliance today...

- The handouts, resources and content of our Financial Management Training can be found at [http://wiki.ilru.net/index.php?title=Financial\\_Management\\_Resources\\_for\\_CILs](http://wiki.ilru.net/index.php?title=Financial_Management_Resources_for_CILs)
- This and other resources related to compliance are posted on the wiki page for this training: [http://wiki.ilru.net/index.php?title=Quality\\_Beyond\\_Compliance](http://wiki.ilru.net/index.php?title=Quality_Beyond_Compliance)

# Using RSA's Review Checklist for Self-Assessment

We will review the checklist at a couple of points during this training.

The purpose is not to *meet* the compliance requirements, but to think about how we can exceed them.

# Why use and know RSA's review tool?

- It lays out compliance expectations for CILs in a checklist format for ease of consideration of each topic.
- A self-review will help assure your CIL is meeting and exceeding federal requirements.
- It includes regulations that apply to all federal dollars, not only Department of Education.

# Compliance and *beyond...*

- Know/meet legal and contractual requirements.
- Use actual RSA On-Site Checklist to check your center's readiness and compliance.
- Compliance is the foundation for building and measuring quality.
- Download most current in PDF or Word from <http://rsa.ed.gov/display.cfm?pageid=394>

# As you review, collect, and organize

- **Don't** just go down the checklist and mark it.
- **Do** actually locate the document or person who has the proof that you meet the item.
- **Do** write that on your checklist so that you don't forget your thoughts about each area.
- **Do** organize the papers that will document your compliance and demonstrate outcomes.
- **Do** ask yourself how you can *exceed* these expectations.

# Think about building on compliance...

- As you go through the checklist, first confirm compliance...
- ... then ask what outcomes or activities can take your center to a new level.
- You may identify specific goals that should go into your work plan.
- You may identify outcomes that you will report on to the Board of Directors.

# Evaluation Standard 1 – IL Philosophy

- Consumer control in management, establishment of policy and direction of center
- Self-help and self-advocacy
- Development of peer relationships and peer role models
- Equal access to all services, programs, activities, resources, and facilities
- Promotes equal access to these in society whether public or private

# Checklist Item - Consumer Control

- Percentage of governing board members with significant disabilities.

Over 50% significant disabilities? A higher standard?

How do board members disclose that they have a significant disability?

**One best practice** – a written application for board members that makes recruitment easier and provides a place for explaining the philosophy of more than 50% persons with significant disabilities, and for self-disclosure.

**Other ideas for best practices?**

## Checklist item – Consumer Control, cont'd.

- Is the board the Principle Decision-Making Body?

*Tip: Bylaws? Policies and Procedures? Actual decisions made? Cross reference board minutes and legal documents. Highlight board decision-making.*

Some best practices – written policies, procedures, roles, for board practices. Clear and complete minutes of proceedings that document board decision-making.

Other ideas for best practice?

## Checklist item – Consumer Control, cont’d. 2

- Over 50 percent of CIL’s employees in decision-making positions are individuals with disabilities.
- Over 50 percent of staff positions are filled with individuals with disabilities.

**A best practice** – number of minority board members, decision-making and other staff positions reflects community or brings in racial or ethnic groups traditionally underrepresented.

**A best practice** – annual board self-assessment to measure progress in this area.

**Other ideas for best practice?**

# Self-help and Self-advocacy

- Promotes self-help and self-advocacy among individuals with disabilities

## Some best practices:

- Consumer service records clearly reflect self-advocacy in both goals and notes.
- Consumers interviewed are able to indicate ways that they are learning to advocate for themselves.
- Calendar shows self-advocacy events.

## Other ideas for best practice?

# Development of Peer Relationship and Peer Role Models

- The CIL promotes the development of peer relationships and peer role models among individuals with significant disabilities.

## Common practices:

- Peer groups
- Peer to peer relationships
- Regularly convened “groups” count but so do other peer relationships.

What are some best practices around peer relationships and peer role models?

# Equal Access

- Communication

Policies and other written materials in alternate formats

On-site TDD/TTY, picture communication for non-readers, video interpreter access, texting, use of relay etc.

Interpreters – Quick access re: ASL but also other languages if appropriate to area served.

**A best practice** – staff who speak the language.

**Other ideas for best practice?**

# Equal Access, cont'd.

- Physical access to all programs, services and resources whether owned, public or private  
Signage, doors, parking, bathrooms, policy and signage re: environmental illness/multiple chemical sensitivity
- Reasonable accommodations – Interpreters?  
Readers? Personal attendants?
- Who can review your site and point out what you are missing? **A best practice** – a third party, expert review.

Other ideas for best practice?

# Advocates for and Conducts Activities That Promote Equal Access

- Sites CIL uses in community
- Programs and services consumers wish to access
- ALL services, programs, activities, resources and facilities in society, whether public or private and regardless of funding source

## Some best practices:

- Surveys of community sites before using them.
- Assist community sites in becoming accessible.
- Assist consumers in requesting equal access to programs, services and locations.

# Evaluation Standard 2 – Provision of Services

- Provides across a range of significant disabilities
- Services are cross-disability
- Eligibility is determined re: the individual has a significant disability; not a specific single disability.
- Brochures, website, accessible and cross-disability.

**A best practice:** aggressive outreach to unserved and underserved populations as identified by SPIL or CIL's three-year work plan.

# Evaluation Standard 3 – Independent Living Goals

The Center shall facilitate the development and achievement of IL goals selected by individuals with significant disabilities who seek assistance in the development and achievement of IL goals from the center.

What is **best practice**? What are the **desired outcomes** for individuals with significant disabilities served by the center?

# Evidence regarding IL Goals

- CIL maintains a consumer service record (CSR) for **each** consumer served.
- CSR includes documentation showing that individuals are eligible or ineligible; typically document signed by consumer or staff **following CIL policy**
- **Only** those eligible are served.
- **EITHER** a written plan **or** a written waiver signed by consumer stating ILPs are unnecessary.

# Specifics about ILPs...

- Indicate goals/objectives established, services to be provided and anticipated duration of services
- Are developed jointly and signed by the appropriate CIL staff member AND the individual
- Are provided in accessible formats, as needed
- Are reviewed at least annually to determine whether services should be continued, modified or discontinued and/or whether the individual should be referred to another program including VR, DD or special education

**Some best practices:** Written CSR management policies/procedures and training for staff in their application. Regular internal case record review of all files.

**Other ideas for best practice?**

# Best practices in Consumer Service Records and ILPs

- Review the consumer records *regularly* to assure the information is being collected
- If you use electronic notes, review these whether or not you print them for the CSR
- Continually remind staff to complete reports of any contact with consumer
- Train staff regarding expectations
- Monitor and correct as needed – continually not just before a compliance review or when 704 data seems off. That is too late.

# Evaluation Standard 4 – Community Options

The center shall conduct activities to increase the availability and improve the quality of community options for IL to facilitate the development and achievement of IL goals by individuals with significant disabilities.

# Evidence of quality for Indicator 4

CIL performed at least one activity in each of these categories in past year. Outcomes are measured related to:

- **Community advocacy**
- **Technical assistance** to the community on making services, programs, activities, resources and facilities accessible
- **Public information and education**
- **Aggressive outreach** to unserved or underserved populations.
- **Collaboration** with other organizations that can assist in improving opportunities for individuals to avail themselves of resources in service area

# Evaluation Standard 5 – Core Services

- The center must provide ALL the core services
- Additional services may also be provided

**Some best practices:** All new staff complete training and get certificates to document their training in the four core services. RapidCourses online – [ilru.org](http://ilru.org)

There is a training plan for all staff that reviews the requirements for services regularly; and completion of training is documented.

There is evidence in CSRs of all core services and more.

**Other ideas for best practice?**

# Evaluation Standard 6 – Resource Development Activities

The center shall conduct resource development activities to obtain funding from sources other than Chapter 1 of title VII of the Act.

**A best practice:** A requirement that all board members are donors and/or that they give or raise a minimum amount set by policy.

**Other ideas for best practice?**

# Small group discussion

- How can you apply the checklist at your CIL?
- Are there any barriers?
- Can you see how the checklist can take you beyond compliance and help you formulate desired outcomes for your center?

# Wrap-Up

- Any questions?

# For more information

Contact:

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