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OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

REHABILITATION SERVICES ADMINISTRATION

Washington, D.C. 20202-2800

**Center for Independent Living (CIL)
On-Site Review Guide (ORG)**

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Table of Contents

I.	Introduction.....	1
II.	Composition of the Review Team.....	2
III.	Preparation for and Conduct of the Review.....	3
IV.	Team Orientation and Utilization.....	4
V.	On-Site Review Activities.....	4
VI.	Post On-Site Review Activities.....	7
VII.	On-Site Review Guide (ORG)	10

I. Introduction

(a) Purpose

Sections 706(c) and 722 of the *Rehabilitation Act of 1973, as amended* (Rehabilitation Act) mandate that the Rehabilitation Services Administration (RSA) annually conduct on-site compliance reviews of at least 15 percent of the centers for independent living (CILs) that receive funds under Section 722 of the Rehabilitation Act. The purpose of this On-Site Review Guide (ORG) is to establish uniform procedures and a format for the conduct of on-site compliance reviews of CILs.

The objectives of the on-site review are to:

- assess compliance with the assurances and evaluation standards in Sections 725(b) and 725(c)(3) of the Rehabilitation Act, 34 CFR 366.50 and 34 CFR 366.63;
- study the program operation, organizational structure and administration of the CIL, under Section 725(c)(1), (2), (5), and (6) of the Rehabilitation Act and 34 CFR 366.2 and 366.50;
- review documentation sufficient to verify the accuracy of the information submitted in the most recent Section 704 Annual Performance Report (704 Report);
- verify that the CIL is managed in accordance with federal requirements in the Education Department General Administrative Regulations (EDGAR);
- assess CIL conformance with its work plan, developed in accordance with Section 725(c)(4) of the act and 34 CFR 366.50(d)(2), conditions of the CIL's approved application and consistency with the State Plan for Independent Living (SPIL);
- identify areas of suggested or necessary improvements in the CIL's programmatic and fiscal operation and provide technical assistance resources available on the local, state, regional and national level;
- identify areas of exemplary work, projects and coordination efforts and make this information available to the larger CIL community; and
- provide an opportunity to share information with experienced nonfederal individuals involved in the operation of CILs and make available technical assistance to enhance CIL operations or to minimize or eliminate problem areas.

(b) Applicable Federal Regulations

- (1) The following regulations in EDGAR 34 CFR --
 - (a) Part 74 (Administration of Grants);
 - (b) Part 75 (Direct Grant Program);
 - (c) Part 77 (Definitions that Apply to Department Regulations);
 - (d) Part 79 (Intergovernmental Review of Department Programs);

- (e) Part 80 (Uniform Administrative Requirements for Grants to State and Local Governments);
- (f) Part 81 (General Education Provisions Act – Enforcement);
- (g) Part 82 (New Restrictions on Lobbying);
- (h) Part 84 (Government wide Requirements of Drug-Free Workplace [Financial Assistance]);
- (i) Part 85 (Government wide Debarment and Suspension [Nonprocurement]); and
- (j) Part 86 (Drug and Alcohol Abuse and Prevention).

- (2) The regulations in EDGAR 2 CFR 230
- (3) The regulations in 34 CFR Parts 364 and 366.

II. Composition of the Review Team

It is RSA’s intent that, in the on-site review process and in the application of the ORG, there be appropriate latitude and flexibility to accommodate the variety of organizational settings and program variations that exist in the CILs funded under, and complying with, Title VII of the Rehabilitation Act. The ORG and procedures were developed to allow this balance to be achieved while assuring uniformity in review practices and consistency of policy interpretation. RSA will coordinate the on-site review with the CIL, the Statewide Independent Living Council (SILC), the DSU, and other appropriate parties.

(a) Mandated Members (Section 706(c)(2) of the Rehabilitation Act)

- (1) Department Employees – RSA shall, to the maximum extent practicable, carry out such a review by using employees of the Department who are knowledgeable about the provision of independent living (IL) services and by ensuring that the employee(s) of the Department with responsibility for supervising such a review have such knowledge. A RSA IL program specialist serves as the team leader. The team leader has the responsibility of ensuring that all required components of the review process are completed and all reports are provided on a timely basis.
- (2) Nongovernment Employee – RSA shall ensure that at least one member of a team conducting such a review shall be an individual who is not a government employee and who has experience in the operation of CILs.

(b) Other Members

- (1) Other RSA staff, including a grants management analyst and/or fiscal expert, may also participate, as available.
- (2) A SILC representative may be invited to participate in the on-site review at SILC expense. RSA will inform the SILC of the CIL review schedule and provide copies of all federal materials to be used in the review. A copy of the review report shall be provided to the SILC whether or not it participates in the review.

- (3) DSU(s) representative(s) may be invited to participate in the on-site reviews at DSU expense. A copy of the review report is provided to the DSU whether or not it participates in the review.

Please note that the SILC and DSU representatives assist the RSA team during the on-site review. They are not, however, involved in making decisions regarding CIL compliance with federal requirements or in drafting the monitoring report (except for verifying factual information).

III. Preparation for the Review

(a) Prior to the review, the RSA team leader will:

- (1) send written notification at least 30 days prior to the on-site review to participants in the review to establish dates and schedules;
- (2) develop/gather appropriate materials and request data from the CIL for distribution to, and review by, the review team members; (Doing some of this work in advance may save time during the on-site review.)
- (3) select the nonfederal member of the review team and initiate arrangements for his/her contract for payment of costs for travel and personal expenses involved with conducting the review; (Any special accommodations required by the nonfederal reviewer to participate in the review should be addressed at this time and arrangements made through RSA.)
- (4) establish and distribute an agenda to all participants in advance of the arrival of the team; (The director of the CIL should receive, as part of the agenda transmittal, all materials and information needed to prepare for the review. Materials should be provided as far in advance as possible but no less than 15 working days before the review date.); and
- (5) ensure that the CIL gathers and makes available the following administrative, programmatic, fiscal and other materials at a central location at the CIL, as appropriate:

Legal

- articles of incorporation;
- 501(c)(3) certificate;
- bylaws;
- IRS Form 990 and supporting documents;
- license(s) (where applicable);
- contracts/written agreements with governments, businesses and community agencies
- insurance policies; and
- original RSA-approved application for Part C funding.

Organizational

- mission statement/program descriptions;
- organizational chart;
- staff roster, including disability status;
- staff job descriptions and performance reviews;
- governing board roster, including disability status;
- minutes of governing board meetings for the past 12 months;
- administrative policies and procedures, including personnel/volunteer manuals and affirmative action plans;
- fiscal policies and procedures, including procurement, property and travel policies; and
- financial statements, reports, payroll records, equipment inventory, audits, etc.

Other

- consumer service records (CSRs), physical files and lists for the fiscal year corresponding to the most recent 704 Report (reporting year);
- IL service delivery policies, procedures and publicity materials;
- Client Assistance Program and appeal procedures for consumers;
- consumer confidentiality policies;
- consumer satisfaction instruments and assessments;
- annual and three-year program/financial planning objectives; and
- work plan for the reporting year and the year after (as per the most recent 704 Report).

Note: This is a sample checklist only, not an exhaustive list of items. Not every item on the checklist is necessarily required for RSA's on-site review. Conversely, it is possible that additional items not on the checklist may be needed to verify a CIL's compliance with applicable federal laws and regulations.

- (6) request and preview selected items from the foregoing list prior to the on-site visit, as necessary;
- (7) make available to the review team members the following materials for their pre-visit review and use on-site:
 - SPIL currently in effect and/or the SPIL that was in effect during the reporting year under review;
 - annual performance report(s) (704 Reports) for the reporting year under review;
 - copy of the ORG;
 - selected items from the list in (5), above, requested for advance review, as appropriate; and
 - information regarding Title VII of the Rehabilitation Act, corresponding program regulations, Education Department of Education General Administrative Regulations (EDGAR) and other relevant federal regulations as appropriate.

Review team members will familiarize themselves with the materials provided by the RSA team leader.

IV. Team Orientation and Utilization

(a) Orientation

- (1) After the materials have been disseminated to the review team, but preferably prior to the arrival of the team on site, a review and discussion must be held regarding roles and functions, the assignment of tasks to team members and any other issues or concerns. The discussion should also include a review of the ORG and the manner in which it is to be completed. This pre-visit orientation is especially critical if team members have not had on-site review experience.
- (2) The pre-meeting may be either by teleconference or on-site prior to the review. However, if the pre-meeting is conducted by teleconference, the RSA team leader should arrange an opportunity for the team members to meet and become acquainted prior to the beginning of the on-site review.
- (3) The ORG can also be used effectively by CILs as a self-assessment tool. Ideally, a CIL should conduct this self-assessment prior to the on-site visit of the review team.

(b) Utilization

It is intended that the RSA team leader will properly utilize the skills and abilities of all members of the team. The team leader must assure a fair and impartial review, while maintaining consumer confidentiality. The team leader will assign roles and responsibilities of the team members. Interests and expertise should be considered in assigning responsibilities to team members and in determining the scope of the review team's activities.

V. On-Site Review Activities

The scope of on-site activities should include the following:

(a) Entrance Conference

The purpose of the entrance conference is to:

- (1) afford an opportunity for the review team and the CIL staff to meet informally and establish rapport;
- (2) introduce team members and their review assignments to the CIL director, board members and staff;
- (3) describe the review purpose, scope and processes;
- (4) verify or modify the proposed agenda, including scheduled meetings with staff, board members and consumers; and

- (5) learn about the CIL, including its service delivery system, organizational structure, staff members and job assignments.

(b) Conducting the Review

- (1) Before starting the review, the team meets privately with the CIL's management staff to give the executive director and key staff the opportunity to share their perspectives about the CIL's particular challenges, opportunities and needs.
- (2) The CIL director or key staff provides the team members with an orientation to their work environment and the location of programmatic, organizational and financial documents to be reviewed, including CSRs.
- (3) This orientation is also an opportunity for the team to assess the CIL's physical and programmatic accessibility and to observe the CIL's arrangements for the provision of services. (The review team's assessment of physical and programmatic accessibility should begin upon arriving at the CIL, through its observation of the exterior signage, parking availability, ease of entry, etc.)
- (4) Upon completion of initial introductions, observations and orientations, the team members start their pre-assigned tasks in accordance with the ORG.

(c) Reviewing CSRs

- (1) RSA will review a representative sample of CSRs of consumers served during the fiscal year corresponding to the most recent 704 Report. The purpose of the review is to determine whether the CSRs:
 - contain all of the elements required by 34 CFR 364.53;
 - reflect the CIL's compliance with relevant CIL program requirements, particularly the evaluation standards outlined in 34 CFR 366.63; and
 - document the consumer, services and outcomes data - including ILPs and waivers - reported in the most recent 704 Report.
- (2) The number of CSRs reviewed must be sufficient to fulfill the purpose of the review, typically 20 to 40 CSRs, depending on the size of the CIL. The RSA team leader will randomly select the CSRs and ensure that the selected ones include the following CSR statuses:
 - opened during the reporting year;
 - carried over from a prior year; and
 - closed during the reporting year, particularly those closed with all goals met.

To assist in the selection of CSRs, the RSA team leader will request a list of all consumers served during the reporting year, including each consumer's CSR status. If required by a CIL's particular circumstances, the RSA team leader may make necessary adjustments to the CSR selection methodology consistent with the CSR review purpose described in (1) above.

- (3) In evaluating CSRs, RSA will use a standardized review checklist consistent with the requirements in 34 CFR 364.53 as well as relevant provisions in 34 CFR 366.50 and 34 CFR 366.63. The RSA team leader will ensure the consistent application of the checklist, especially when multiple team members are tasked with reviewing CSRs.

(d) Verifying the 704 Reports

- (1) RSA will evaluate the CIL's internal controls and procedures for ensuring the accuracy and completeness of the 704 Reports, particularly in the following areas:

- funding sources and amounts;
- number of consumers served;
- demographic characteristics of consumers served;
- IL services and outcomes;
- Independent living plans (ILPs) and waivers; and
- compliance with the assurances and standards (in 34 CFR 366.63 and 34 CFR 364.50).

As part of this evaluation, RSA will review the CIL's financial records; CSRs, consumer lists and physical files; CSR information systems (electronic and/or hard copy); internal procedures for inputting data into the CSR information systems and for transferring data from the information system onto the 704 Report.

- (2) With regard to the assurances and standards, RSA's review will include the CIL's annual and three-year program and financial planning documents, annual work plans, public information materials, board minutes, personnel files, other relevant documents and interviews with consumers, staff and board members.

(e) Conducting the Fiscal Grants Management Review

- (1) RSA's fiscal grants management review activities will focus on the CIL's internal controls and supporting documentation consistent with EDGAR 34 CFR 74.21 for ensuring that Part C funds expenditures are allowable, allocable and reasonable in accordance with the federal cost principles at 2 CFR 230 (OMB Circular A-122). The review will also address the CIL's compliance with federal requirements in the areas of procurement, property, budgeting, program income, indirect costs, etc.
- (2) As part of its fiscal grants management review, RSA will evaluate the CIL's written policies and procedures and the extent to which they are being implemented. RSA will also review funding sources and amounts, expenditure forms, receipts and vouchers, drawdowns, accounting ledgers, other relevant documentation and interviews with staff and board members.

(f) Identifying the Verifying Documentation

Where the ORG requests identification of verification sources, the team will not necessarily maintain copies of the documents themselves, unless deemed necessary for developing the

monitoring report. Usually, it is sufficient to note the document names and/or sources in the monitoring report.

(g) Pre-Exit Conference Meeting of the Review Team

Prior to the exit conference, the team members meet privately with the CIL director and, subsequently, among themselves to share information to be discussed during the exit conference and/or included in the written report. These meetings should include:

- (1) discussion of preliminary observations, including findings, concerns and/or tentative recommendations;
- (2) review of available information for completeness, adequacy and accuracy to determine if additional information should be requested to complete the review;
- (3) consensus regarding the information, impressions and other details to be presented at the exit conference, including the CIL's organizational or service provision strength and suggestions for technical assistance; and
- (4) discussion of team members' follow-up activities, assignments and timelines required to enable the team to complete the report in a timely basis;

(h) Exit Conference

The purpose of the exit conference is to provide feedback to the CIL director, staff and governing board, regarding the CIL's strengths and areas for improvement. It will be the judgment of the team leader as to the exact nature and specificity of the topics to be discussed.

VI. Post On-Site Review Activities

(a) Draft Report

- (1) A draft on-site review report is completed by the team leader, with input from the team members, and forwarded to the RSA IL unit chief for review. The draft report contains specific findings of noncompliance, if any, with citations from the act and relevant regulations. The report describes the corrective action(s) the CIL must take to address compliance issues and offer technical assistance. The report may also include observations and recommendations for improvement that are based on effective practices and should be noted as such and described in a separate section of the report.
- (2) Within 30 days after the on-site review, RSA issues the draft report to the CIL's executive director and board chair, as well as the review team members.
- (3) The CIL provides RSA with a written response to the draft report within 30 days from the date that it receives the report. The response should provide any factual clarifications and indicate whether the CIL agrees or disagrees with any compliance findings in the report. If the CIL disagrees with any finding, it must describe its differences with the findings and

provide supporting information, including a description of any corrective steps taken since the review.

(b) Final Report

After consideration of the CIL's written response, RSA issues a final report to the CIL's executive director and governing board, with copies to the SILC and the DSU(s), within 30 days from the date that the CIL provides its written response to the draft report. This report, signed by the RSA commissioner or designee, is RSA's official determination of CIL compliance with Department requirements and will remain on file as part of the CIL's record at RSA. The final report will also be posted on RSA's Web site.

The final report will incorporate comments received from the CIL, as appropriate, and include the following elements:

- (1) CIL's mission and programs;
- (2) organizational or service provision strengths;
- (4) observations and the corresponding recommendations for organizational and service provision improvements;
- (5) findings of noncompliance, along with the corresponding citations from federal law and regulations, facts and analysis, and the required corrective actions;
- (6) suggestions for technical assistance and potential sources for such technical assistance; and
- (7) completed ORG, with appropriate references to the findings and recommendations.

(c) Corrective Action Plan (CAP)

- (1) Within 30 days of receiving a final report containing compliance findings, the CIL must submit a corrective action plan (CAP) describing the specific steps it has taken, or intends to take, with a corresponding time frame for each step, for resolving the findings. The CIL may request technical assistance from RSA in developing its CAP.
- (2) Within 30 days of receiving the CAP, RSA will notify the CIL of the approval. If it is approved, the CIL will be eligible for continuation funding. RSA may provide technical assistance to the CIL before and/or after its approval of the CAP. If the CAP is not approvable, RSA will work with the CIL to develop an approvable plan within 30 days of the disapproval. If RSA cannot approve a CAP, RSA may then start enforcement proceedings.
- (3) RSA will follow up with the CIL periodically to assess CIL progress on the CAP until all the steps in the CAP have been achieved.
- (4) Upon satisfactory completion of all corrective actions, RSA will notify the CIL that the CAP is being closed out successfully.

(d) Enforcement and Appeals Procedures

RSA reserves the right to initiate enforcement procedures, in accordance with 34 CFR 366.39 through 366.46, if justified by the nature of the compliance findings: CIL failure to submit an approvable CAP; CIL failure to make progress on the CAP, or other circumstances.

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REHABILITATION SERVICES ADMINISTRATION

Washington, D.C. 20202-2800

Center for Independent Living (CIL)

On-Site Review Instrument

Fiscal Year:

Name of
Grantee:

Grant #:

State:

Rehabilitation Act of 1973, as amended

Title VII, Chapter I, Sections 706 and 722 – CIL Program

Part I

STANDARDS, INDICATORS AND ASSURANCES FOR CILS

The following questions are based on the CIL standards, indicators and assurances as required in Title VII of the Rehabilitation Act and the corresponding regulations. Unless otherwise noted, a “no” response indicates that the CIL did not demonstrate minimum compliance with the corresponding standard, indicator or assurance. A “no” response will be the basis for a corresponding finding in the report. The term *recommended practice* denotes a practice that, although not explicitly required by federal law or regulations, would, if followed, further the purpose of the independent living (IL) program.

I. Grantee is an Eligible Agency

Section 725(c)(1) of the Rehabilitation Act; 34 CFR 364.4(b)

Yes No The CIL meets the definition of eligible agency as defined in the statute and regulations.

Verification Source:

II. Standards and Indicators

Section 725(b) and (c)(3) of the Rehabilitation Act; 34 CFR Part 366, Subpart G; 704 Report, Part II

The purpose of this subpart is to measure the extent to which the CIL is in compliance with the standards and assurances in Section 725(b) and (c) of the act.

Compliance Indicator I – Philosophy

Section 725(b)(1) of the Rehabilitation Act; 34 CFR 366.63(a)

Consumer Control

Sections 702(2), 725(b)(1)(A) and 725(c)(2) of the Rehabilitation Act; 34 CFR 366.63(a)(1)

(a) Governing Board

Sections 725(b)(1)(A) and 725(c)(2) of the Rehabilitation Act; 34 CFR 366.50(b) and 366.63(a)(1)(i)(A)

Verification of Consumer Control

____ Number of persons on the governing board.

____ Number of governing board members with significant disabilities.

Yes No Is line (ii) over 50 percent of line (i)?

Recommended Practice:

____ Number of members from minority groups on the governing board.

Yes No Verification that the CIL Board is the Principal Decision-Making Body
The CIL board is the principal governing body of the CIL, as evidenced, for example, by its bylaws, policies and procedures, and other practices ensuring that policy decisions are vested with the governing body.

Recommended Practices:

Yes No The CIL has policies and procedures specifying board members' roles and responsibilities.

Yes No The CIL has a written process for identifying and recruiting board members.

Verification Sources for Governing Board:

(b) CIL Employees

Sections 725(b)(1)(A) and 725(c)(6) of the act; 34 CFR 366.63(a)(1)(i)(B)

<u>CIL Employees</u>	<u>Total Persons</u>	<u>Persons with Disabilities</u>
Decision-making positions	_____	_____
Other staff positions	_____	_____

Yes No Over 50 percent of the CIL's employees in decision-making positions are filled by individuals with disabilities.

Yes No Over 50 percent of staff positions are filled by individuals with disabilities.

Recommended Practice:

____ Number of minority¹ employees (decision-making and other staff positions)

Verification Sources for CIL Employees:

Self-help and Self-advocacy

Section 725(b)(1)(B) of the Rehabilitation Act; 34 CFR 366.63(a)(2)

Yes No The CIL promotes self-help and self-advocacy among individuals with significant disabilities.

Verification Sources for Self-help and Self-advocacy:

¹ In this instance, "minority" refers to members of racial or ethnic groups that have been traditionally underrepresented.

Development of Peer Relationships and Peer Role Models
Section 725(b)(1)(C) of the Rehabilitation Act; 34 CFR 366.63(a)(3)

Yes No The CIL promotes the development of peer relationships and peer role models among individuals with significant disabilities.

Verification Sources for Development of Peer Relationships and Peer Role Models:

Equal Access

Section 725(b)(1)(D) of the Rehabilitation Act; 34 CFR 364.23(b) and 366.63(a)(4)(5)

Yes No Ensures equal access of individuals with significant disabilities, including communication and physical access, to the CIL's services, programs, activities, resources and facilities, whether publicly or privately funded.
Equal access, for purpose of this question, means that the same access is provided to any individual with a significant disability regardless of the individual's type of disability.

Yes No Advocates for and conducts activities that promote the equal access to all services, programs, activities, resources and facilities in society, whether public or private, and regardless of funding source, for individuals with significant disabilities.
Equal access, for the purposes of this question, means that the same access provided to individuals without disabilities is provided in the center's service area to individuals with significant disabilities.

Yes No To the maximum extent feasible, makes available personnel able to communicate with individuals with significant disabilities who rely on alternative modes of communication (manual communication, nonverbal communication, Braille, audiotapes, etc.) and who apply for or receive IL services.

Yes No To the maximum extent feasible, makes available personnel able to communicate in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services.

Yes No Makes available in alternate formats, as appropriate, all of its written policies, materials and IL services (e.g., Braille, large print, audio tape).

Yes No The CIL is physically accessible for individuals with significant disabilities, for example, individuals with mobility disabilities (e.g., signage, doors, bathrooms, parking lots) or individuals with Environmental Illness and Multiple Chemical Sensitivity (e.g., no-fragrance policy or use of "green" cleaners).

Yes No The CIL ensures communication access for individuals with significant disabilities by using, for example, TDDs/TTYs for individuals with hearing disabilities or picture boards and/or other means of communication for individuals with cognitive disabilities.

Types of reasonable accommodation:	Full-time	Part-time	Upon Request
Interpreters are available at the CIL.	_____	_____	_____
Readers are available at the CIL.	_____	_____	_____
Personal attendants are available at the CIL.	_____	_____	_____

Verification Sources for Equal Access:

**Compliance Indicator 2- Provision of Services on a Cross- Disability Basis
Section 725(b)(2) of the Rehabilitation Act; 34 CFR 366.63(b)**

- Yes No Provides IL services to eligible individuals or groups of individuals without restrictions based on the particular type or types of significant disability of an individual or groups of individuals, unless the restricted IL service (other than the IL core services) is unique to the significant disability of the individuals to be served, e.g., Braille instruction for persons who are blind.
- Yes No Provides IL core services to individuals with significant disabilities in a manner that is neither targeted nor limited to a particular type of significant disability.
- Yes No Provides IL services to individuals with a diversity of significant disabilities and individuals who are members of populations that are unserved or underserved by programs under Title VII of the act.

Verification Sources for Provision of Services on a Cross-Disability Basis:

**Compliance indicator 3 – Independent Living Goals
Section 725(b)(3) of the Rehabilitation Act; 34 CFR 366.63(c); 34 CFR 364.52; 34 CFR 364.53**

- Yes No The CIL maintains a consumer service record (CSR) for each consumer.

The CSRs contain:

- Yes No Documentation showing that the individuals are eligible or ineligible for services (only those eligible are served).
- Yes No Written Independent Living Plans (ILPs) or written waivers from the consumers stating that ILPs are unnecessary.
- Yes No Information on the services requested by, and the services provided to, or arranged for, the consumers.
- Yes No The IL goals or objectives established with the consumers, whether or not in the ILPs.

Yes No The goals or objectives the consumers believe they have achieved.

The CIL maintains documentation on:

Yes No CIL notification to consumers of their right to develop, or waive the development, of an ILP.

Yes No The number of ILPs developed by consumers receiving services from the CIL.

Yes No The number of waivers signed by consumers receiving services from the CIL stating that an ILP is unnecessary.

Yes No The CIL's facilitation of the development and achievement of IL goals selected by individuals with significant disabilities who request assistance from the CIL.

Yes No The CIL's provision of opportunities for consumers to express satisfaction or dissatisfaction with the CIL's services and policies and documentation the CIL sends any results to its governing board and the appropriate SILC.

The ILPs:

Yes No Indicate the goals or objectives established, the services to be provided and the anticipated duration of the services.

Yes No Are developed jointly and signed by the appropriate CIL staff member and the individual with a significant disability/legally authorized representative.

Yes No Are provided in accessible formats, as needed.

Yes No 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, developmental disability or special education individualized plans as appropriated.

Recommended Practice:

Yes No The CIL has written CSR management policies and procedures.

Verification Sources for Independent Living Goals:

**Compliance Indicator 4 – Community Options and Community Capacity
Section 725(b)(4), (6), and (c)(10) of the Rehabilitation Act; 34 CFR 366.63(d)**

The CIL performed at least one activity in each of the following categories during the reporting year:

Yes No Community advocacy.

- Yes No Technical assistance to the community on making services, programs, activities, resources and facilities in society accessible to individuals with significant disabilities.
- Yes No Public information and education.
- Yes No Aggressive outreach to populations of individuals with significant disabilities that are unserved or underserved by programs under Title VII of the act in the CIL's service area.
- Yes No Collaboration with service providers, other agencies, and organizations that could assist in improving opportunities for individuals with significant disabilities to avail themselves of the services, programs, activities, resources and facilities in the CIL's service area.
- Yes No Did the CIL's outreach to unserved or underserved populations include minority groups and urban and rural populations?

Verification Sources for Community Options and Community Capacity:

**Compliance indicator 5 – IL Core Services and Other IL Services
Section 725(b)(5) of the Rehabilitation Act; 34 CFR 366.63(e); 34 CFR 364.51(b)(2)(iii); 34 CFR 364.58**

- Yes No The CIL provides information and referral services to all individuals who request this type of assistance from the CIL in accessible formats.

The CIL provides the following services in response to requests from individuals with significant disabilities who are eligible for IL services:

- Yes No Independent living skills training.
- Yes No Peer counseling (including cross-disability peer counseling).
- Yes No Individual and systems advocacy.
- Yes No A combination, as appropriate, of any two or more of the IL services defined in Section 7(18)(B) of the act.

The CIL maintains documentation regarding notification of applicants and consumers about:

- Yes No Policies and procedures, including accessible formats, to obtain review of decisions made by the CIL concerning requests for/provision of IL services.
- Yes No The availability of the Client Assistance Program (CAP) and how to contact the CAP, including accessible formats.

Verification Sources for IL Core Services and Other IL Services:

Compliance indicator 6 – Resource Development
Section 725(b)(7) of the Rehabilitation Act; 34 CFR 366.63(e)

Yes No The CIL during the reporting year conducted resource development activities to obtain funding from sources other than Chapter 1, Title VII, of the act.

Verification Sources for Resource Development Activities:

III. Program and Financial Planning Objectives
Section 725(c)(4) of the Rehabilitation Act; 34 CFR 366.50(d)

Yes No The CIL has established annual and three-year program and financial planning objectives.

Yes No The objectives include the CIL's goals and mission.

Yes No The CIL has a current work plan for achieving the goals or mission and has included specific activities to meet the requirements in the indicators.

Yes No The work plan includes specific services, priorities and types of services to be provided.

Yes No The objectives and work plan are consistent with the current SPIL.

Recommended Practices:

Yes No The work plan includes objectives and goals for obtaining or increasing non-Title VII funding.

Yes No The work plan addresses board, staff and/or volunteers training.

Verification Sources for Program and Financial Planning Objectives:

IV. 704 Report Accuracy and Documentation
Section 725(b)(c) of the Rehabilitation Act; 34 CFR 366.50(h)(i)

Yes No The CIL has implemented internal controls and procedures (including quality assurance) to ensure 704 Report accuracy and documentation.

Yes No Based on the CSRs, consumer lists, physical files and other documentation reviewed by RSA, the funding sources and amounts, CSR data (number of consumers, consumer demographics, ILPs and waivers, IL services and goals), standards and assurances compliance and other information in the most recent 704 Report are accurate and complete.

Part II

ORGANIZATION AND ADMINISTRATION OF THE CIL

V. Organizational and Personnel Practices

Sections 704(m)(2) and 725(c)(5) of the Rehabilitation Act; 34 CFR 364.31; 34 CFR 366.50(e)

Yes No The CIL uses sound organizational and personnel assignment practices (including organizational chart indicating lines of authority, job descriptions, performance appraisals).

Yes No The personnel practices include affirmative action to employ and advance in employment qualified individuals with significant disabilities.

Recommended Practice:

Yes No The CIL has personnel policies addressing such areas as wage and salary, fringe benefits, vacation and sick leave, etc.

Verification Sources for Organizational and Personnel Practices:

VI. Staff Development and Training

Section 725(c)(11) of the Rehabilitation Act; 34 CFR 364.23(a); 34 CFR 364.24; 34 CFR 366.50(l)

Yes No The CIL includes personnel who are specialists in the development and provision of IL services and in the development and support of centers.

Yes No The CIL has established and maintains a program of staff development for all classes of positions involved in providing IL services and, where appropriate, in administering the CIL program.

Yes No The staff development program is directed at improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

Yes No The staff receives training on how to serve unserved and underserved populations, including minority groups and urban and rural populations.

Recommended Practice:

Yes No The CIL has a governing board training and development program.

Verification Sources for Staff Development and Training:

VII. Conflict of Interest
EDGAR 34 CFR 75.525

- Yes No The CIL safeguards against a person (employee, board member, volunteer) to participate in an administrative decision regarding a project if the decision is likely to benefit that person or a member of his or her immediate family and that person is a public official or has a family or business relationship with the CIL.
- Yes No The CIL safeguards against any person in the project to use his or her position for a purpose that is, or gives the appearance of being, motivated by a desire for a private financial gain for that person or for others.

Verification Sources for Conflict of Interest:

VIII. Confidentiality
34 CFR 364.56(a)

- Yes No The CIL has adopted and implemented policies and procedures to safeguard the confidentiality of all personal information, including photographs, publicity releases and lists of names that comply with 34 CFR 364.56(a) requirements including but not limited to:
- Yes No protecting current and stored personal information.
- Yes No informing IL applicants or consumers, authorized representatives, service providers and others, as appropriate, about the confidentiality of personal information and the conditions for gaining access to and releasing this information.

Recommended Practice:

- Yes No The CIL has meeting space that ensures that consumers' confidentiality is protected when meeting with staff.

Verification Sources for Confidentiality:

IX. Drug-Free Workplace
EDGAR 34 CFR 84.200 – 84.230

- Yes No The CIL conforms to the requirements of a drug-free workplace.
- Yes No A statement is published notifying employees that the unlawful manufacture, distribution, dispensing, possession or use of controlled substances is prohibited at the CIL and specifying the action that will be taken against employees for violating the prohibition.
- Yes No The CIL has established an ongoing drug-free awareness program.

Yes No Each grant-funded employee has been given a copy of the prohibition statement, including a notification that conditions of employment at the CIL require abiding by the statement and informing the director of the CIL of any convictions under a drug statute.

Yes No The CIL has taken appropriate personnel action against employees or has required employees to participate in drug abuse assistance program or rehabilitation program if such employees were convicted under a criminal drug statute conviction.

Verification Sources for Drug-Free Workplace:

X. Insurance Coverage
EDGAR 34 CFR 74.31

Yes No The CIL has insurance coverage for real property and equipment acquired with federal funds equivalent to that provided for property owned by the grantee.

Verification Sources for Insurance Coverage:

XI. Nondiscrimination
EDGAR 34 CFR 75.500

Yes No The CIL does not deny services to persons on the basis of their race, color, national origin, sex, age or the existence of a disability.

Verification Sources for Nondiscrimination:

XII. Prohibition Against Lobbying

EDGAR 34 CFR 82.100; 2 CFR 230, Attachment B, Item 25

Yes No The CIL has on file a signed and dated copy of the Certification of Lobbying Form ED-80-0013 against using federal funds to influence or attempt to influence any federal agency or Congress through lobbying activities as described in 2 CFR 230, Attachment B, Item 25 and EDGAR 34 CFR 82.100.

Recommended Practice:

Yes No Incorporates provisions consistent with 2 CFR 230, Attachment B, Item 25 safeguarding against lobbying in its written policies and procedures.

Part III

GRANTS MANAGEMENT

XIII. Sources and Amounts of Funding (as verified by the review team)

(A) Title VII, Ch. 1, Part B	\$
(B) Title VII, Ch. 1, Part C	\$
(C) Title VII, Ch. 2	\$
(D) Other Federal Funds	\$
(E) State Government Funds	\$
(F) Local Government Funds	\$
(G) Foundations, Corporations, or Trust Grants	\$
(H) Donations from Individuals	\$
(I) Membership Fees	\$
(J) Investment Income/Endowment	\$
(K) Fees for Service (program income, etc.)	\$
(L) Other Resources (in-kind, fundraising, etc.)	\$

Item 4 - Total Income

Total income = (A)+(B)+(C)+(D)+(E)+(F)+(G)+(H)+(I)+(J)+(K)+(L) \$

Item 5 - Pass Through Funds

Amount of other government funds received as pass through funds to consumers (include funds received on behalf of consumers that are subsequently passed on to consumers, e.g., personal assistance services, representative payee funds, or Medicaid funds) \$

Net Operating Resources

Total Income (Section 4) <minus> amount paid out to consumers (Section 5) =
Net Operating Resources \$

IV. Grant Related Income

34 CFR 364.6; EDGAR 34 CFR 74.2 and 74.24

Yes No If program income is generated with federal funds, such income is used for allowable and approved purposes.

Verification Sources for Grant Related Income:

V. Budget

EDGAR 34 CFR 74.21, 74.25, 75.702 and 75.730

Yes No Expenditures are recorded by budget cost category and funding sources.

Yes No Procedures are followed to assure expenditures are consistent with the approved budget of the CIL.

Yes No CIL requests prior RSA approval for budget and program plan revisions, when required under EDGAR 74.25.

Verification Sources for Budget:

XVI. Personnel Cost Allocation

2 CFR 230, Attachment B, Item 8(m)(1)

Yes No Salaries and wages are charged based on documented payrolls approved by a responsible official.

Yes No The distribution of salaries and wages are supported by personnel activity reports described in 2 CFR 230 Appendix B, Item 8(m)(2) and reflecting an after-the-fact determination of the actual activity of each employee.

Yes No The CIL maintains reports reflecting the distribution of activity of all staff members whose compensation is charged to the award.

XVII. Fiscal Management

EDGAR 34 CFR 74.21, 74.22, 74.52, 75.702, 75.707, 75.730; 2 CFR 230 Appendix A, Paragraph D

The CIL's financial management systems provides for the following:

Yes No Accurate, current, and complete disclosure of the financial results of each federally-sponsored project in accordance with the reporting requirements of the SF-425 financial status report, including program income, federal and recipient shares of expenditures, indirect costs, etc.

- Yes No Records that identify adequately the source and application of funds for federally-sponsored activities.
- Yes No Effective control over and accountability for all funds, property and other assets in order to safeguard all assets and ensure they are used solely for authorized purposes.
- Yes No Comparison of outlays with budget amounts for each award.
- Yes No Written procedures that minimize the time between the transfer of funds and the disbursement of funds by the recipient.
- Yes No Written procedures for determining the reasonableness, allocability and allowability of costs.
- Yes No Accounting records, including cost-accounting records, supported by source documentation and entries are made on a timely basis.

Name/Title of person responsible for preparation of the SF-425:

- Yes No The CIL has an approved U.S. Department of Education cost allocation plan (CAP) or indirect cost rate.
- Yes No The CIL distributes administrative costs among its various funding sources in an equitable manner as described in the CIL's approved CAP or indirect cost rate.

Verification Sources for Fiscal Management:

XVIII. Accounting Systems
EDGAR 34 CFR 74.21

- Yes No The organization maintains a formal accounting system.

If the accounting system is computerized, identify the accounting program software used:

The elements of the formal accounting system are (*check as appropriate*):

- ___ General Ledger
- ___ Grant Ledger
- ___ General Journal
- ___ Cash Receipts

Describe other(s):

The formal accounting system is maintained by (*check as appropriate*):

- ___ Cash basis

____ Accrual basis

Describe other(s):

Verification Sources for Accounting Systems:

XIX. Travel Costs

EDGAR 34 CFR 74.27; 2 CFR 230, Attachment B, Item 51(b)

Yes No Travel costs incurred by employees and officers are reasonable and allowable, i.e., do not exceed charges allowed under the CIL's written travel policy or, in the absence of such a policy, as provided in 2 CFR 230, Attachment B, Item 51(b).

Yes No Travel costs reimbursement requests for federal funds are justified and documented, e.g., through travel authorizations, receipts, etc, in accordance to the CIL's travel policy.

The policy provides for reimbursement by (*check as appropriate*):

____ (1) Actual expenses

____ (2) Per diem

Verification Sources for Travel Policies:

XX. Procurement

EDGAR 34 CFR 74.21 and 74.40 - 74.48

Yes No The CIL has written procurement procedures complying with EDGAR 34 CFR 74.44.

Yes No The procurement procedures give adequate consideration to costs, quality, delivery, competitive bidding, inspection and acceptance, as well as reasonableness, allocability and allowability of costs.

Yes No The procurement procedures address the 34 CFR 74.42 – 74.48 requirements including written contract award and administration code of conduct; open and free competitions; cost and price analysis; records and files; contractor conformance/performance.

Yes No There is separation of responsibility for the authorization for purchasing and the subsequent payment. For example, payments are made only if disbursements or checks are countersigned.

Yes No Payment vouchers are identified as to funding sources, expense classification and transaction date.

The executive staff/board approval is needed for items over:

The person(s) responsible for purchasing equipment and supplies:

Verification Sources for Purchasing:

XXI. Property

EDGAR 34 CFR 74.34(f) and (g), 74.44(a)

Yes No The CIL maintains current and complete records of all property purchased with grant funds.

Yes No The CIL has a system for controlling inventory (general ledger control account, card reports, property labels).

Yes No Maintenance of property and equipment records are kept.

Yes No Records contain: description of each piece of equipment; purchase date/cost; manufacturer's serial number, model number, federal stock number, national stock number, or other ID number; source of equipment award number; where title vests; information from which federal participation can be calculated; location and condition of the equipment, date information was reported; and ultimate disposition

Yes No The CIL inventories property at least once every two years.

Date of last inventory:

Yes No Adjustments to inventory accounts are made only on written authority of a designated official.

Name/Title of designee:

Yes No The CIL guards against loss, damage or theft of property.

Yes No The CIL has policies, procedures and controls for purchasing and disposing of property.

Verification Sources for Property:

XXII. Conferences and Meetings

2 CFR 230; Memorandum to Grantees Regarding the Use of Grant Funds for Conferences and Meetings, U.S. Department of Education, June 2012 (GAN Enclosure 7)

Yes No The CIL ensures (e.g., through written policies or procedures) that, when hosting a conference or meeting, Part C or other federal funds are not used to purchase:
-food for attendees unless doing so is necessary to accomplish legitimate meeting or conference business;*

- alcoholic beverages; or
- entertainment (amusement, diversion, social activities, etc.)*

* This prohibition does not apply to social and recreational services described in 34 CFR 364.4 and related to IL goal(s) in a consumer’s CSR, such as peer support meetings.

XXIII. Records Retention

34 CFR 364.53; EDGAR 34 CFR 74.53(b); EDGAR 34 CFR 75.730

Yes No Financial, consumer records and other documentation are maintained and retained for a period of three years in accord with federal requirements.

Verification Sources for Records Retention:

XXXIV. Audit

EDGAR 34 CFR 74.26

Yes No The CIL expended \$500,000 or more in federal awards during the reporting year.

Yes No *If “Yes” above, an annual nonfederal audit including funds received under Title VII, Chapter 1 of the act has been conducted and a copy thereof submitted to the Federal Audit Clearinghouse, as required.*

Verification Sources for Audit: