

Center for Independent Living (CIL) On-Site Compliance Review

CIL: NEILS

DATE: June 3 2021

NAME OF REVIEWER: Lisa Meisenheimer & Elizabeth Smith

I - LEGAL

	YES	NO
- Articles of incorporation	X	
- 501(c)(3) certificate	X	
- By-laws	X	
- IRS Form 990	X	
License(s) (where applicable)	X	
Contracts and/or written agreements with business, industry, and community agencies	X	
Contracts/Purchase of Service agreements with State agencies	X	
Insurance policies	X	

II - ORGANIZATIONAL

	YES	NO
Mission statement	X	
Administrative policy and procedure manual of office policies and procedures	X	
Organizational chart	X	
Roster of members of the governing board and Staff.	X	
Minutes of meetings of the governing board for the past twelve (12) months	X	
Minutes of staff meetings for the past twelve (12) months	X	

III - OTHER

	YES	NO
Descriptions of programs conducted by the CIL Service policies, procedures,	X	
I & R system, policies, procedures	X	
Appeal procedures for consumers	X	
Policy on confidentiality	X	
Information on consumers assistance program	X	

CIL ON-SITE COMPLIANCE REVIEW

Consumer satisfaction assessments	X	
Service area needs assessment (Documentation for community awareness/needs)	X	
Job descriptions	X	
Affirmative action/EEO plan	X	
Volunteer policies	X	
Staff performance reviews	X	
Current Equipment Inventory (office equipment)	N/A	
Current Equipment Inventory (medical equipment & supplies for consumers)	X	
Other relevant material (e.g., video tapes, media releases, newsletters, etc.)	X	
Annual Work Plan		
• Long-range plan	X	
• Financial plan	X	
• Advocacy plan	X	
• Resource development plan	X	
• Staff and board training plans	X	

PART I

STANDARDS, INDICATORS, AND ASSURANCES FOR CILS

	YES	NO
The CIL meets the definition of eligible agency as defined in the statute and regulations	X	
Comments or recommendation:		

SUBPART IIA: STANDARDS AND INDICATORS

The purpose of this subpart is to measure the extent to which the CIL is in compliance with State and Federal standards:

COMPLIANCE INDICATOR 1 - PHILOSOPHY

The indicator for this standard is composed of four parts.

I- **Consumer control.**

(a) **Governing Board.**

(1) **Verification of Consumer Control:**

(i) Number of persons on the governing board	11
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(ii) Number of governing board members with significant disabilities.		
	YES	NO
Paragraph (ii) is over 51%	X	

(iii) Number of different disability groups represented by members of the governing board.*	
(A) Cognitive	2
(B) Mental/Emotional	
(C) Physical	4
(D) Hearing	
(E) Vision	
(F) Multiple Disability	3
(G) Other	

	YES	NO
(iv) Number of members from minority groups on the governing board.	3	

	YES	NO
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(v) The CIL has a process for nominating and electing Board members.*	X	
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	YES	NO
(vi) The nominating and/or election process provides for participation by consumers of CIL services.	X	
* Seven of the 11 Board Members at NEILS are Consumers of the Center.		

(2) Board is Principal Decision making Body.

	YES	NO
The By-laws or other documents or practices of the CIL ensure that policy decisions are vested with the Governing Board?	X	
If decision or veto authority rests in a body other than the governing board, describe:		

	YES	NO
(ii) Does the CIL have policies and procedures for Board members, which specify roles and responsibilities? If so, cite source: By-Laws	X	
The Governing board is the principal governing body of the CIL.	X	

(b) CIL employees.

CIL Employees	Total Persons	Persons w/Disabilities	# of Minority Employees	
(1) Decision-making positions	5	4		
(2) Staff positions	9	5	1	
			YES	NO
Over 51% of the CIL's employees in decision-making positions are filled by individuals with disabilities; and			X	
Individuals with disabilities fill over 51% of staff positions.			X	
Comments or recommendation:				

The determination that over 51% percent of a CIL's employees in decision-making and staff positions are filled by individuals with disabilities is based on the total number of hours (excluding any overtime) for

which employees are actually paid during the last six months of the reporting year. A center must include in this determination its employees who are on unpaid family or maternity leave during this six-month period. For purposes of this section a CIL may exclude personal assistants, readers, drivers, and sign-language interpreters.

II - Self-help and self-advocacy.

	YES	NO
The CIL promotes self-help and self-advocacy among individuals with significant disabilities (e.g., by conducting activities to train individuals with significant disabilities in self-advocacy.)	X	
Comments or recommendation:		

III - Development of peer relationships and peer role models.

	YES	NO
The CIL promotes the development of peer relationships and peer role models among individuals with significant disabilities;	X	
Comments or recommendation:		

IV - Equal access

The CIL—

	YES	NO
(a) 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 purposes of this paragraph, means that the same access is provided to an individual with a significant disability regardless of the individual’s type of significant disability.	X	
(b) 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 purposes of this paragraph, means that the same access provided to individuals without disabilities is provided in the CIL’s service area to individuals with significant disabilities.	X	
(c) Makes available in alternative formats, such as other languages, braille, etc., when appropriate, all of its written policies and materials and IL services.	X	

GENERAL ASSESSMENT OF HOW THE CIL COMPLIES WITH THE EQUAL ACCESS INDICATOR

	YES	NO
(a) The CIL provides equal access to all services, programs, activities, resources, and facilities.	X	
(b) The CIL is totally physically accessible for persons with mobility disabilities.	X	
(c) There are TDDs/TTYs and/or other available means of communication to ensure access at the CIL for persons with hearing disabilities.	X	
(d) There are Brailers and/or other available means of communication to ensure access at the CIL for persons with visual disabilities.	X	
(e) There are picture boards and/or other means of communication available to assure access at the CIL for persons with reading disabilities.	X	
(f) The CIL is accessible for persons with Environmental Illness (E.I.) and Multiple Chemical Sensitivity (MCS) or the CIL has alternative ways of ensuring access to CIL services.	X	
(g) Type of reasonable accommodation: Full-time _____ Part-time _____ Upon Request Only <u>(H)(I)(J)(K)</u> N/A _____		
(h) Interpreters are available at the CIL.		
(i) Readers are available at the CIL.		
(j) Personal attendants are available at the CIL.		
(k) Materials are produced by the CIL in different forms as needed (e.g., Braille, large print, tape, alternative languages.)		
(l) Public relations materials stress equal access to society for all individuals with disabilities.	X	

COMPLIANCE INDICATOR 2 - PROVISION OF SERVICES ON A CROSS-DISABILITY BASIS

	YES	NO
(a) 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 group 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;	X	
(b) 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; and	X	

(c) 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.	X	
Comments or recommendation:		

COMPLIANCE INDICATOR 3 - INDEPENDENT LIVING GOALS

Consumer Service Records (CSR's.)

	YES	NO
(a) The CIL maintains a CSR for each consumer;	X	
(b) The CSR's contain: (1) Documentation showing that the individuals are eligible or ineligible for services (only those eligible are served); (2) Written ILPs or written waivers from the consumers stating that ILPs are unnecessary; (3) Information on the services requested by, and the services provided to, or arranged for, the consumers; (4) The IL goals or objectives established with the consumers, whether or not in the ILPs. (5) The goals or objectives the consumers believe they have achieved.	X X X X X	
(c) The CIL maintains documentation: (1) That the CIL notifies all consumers of their right to develop or waive the development of an ILP (2) On the number of ILPs developed by consumers receiving services from the CIL; (3) On the number of waivers signed by consumers receiving services from the CIL stating that an ILP is unnecessary. (4) That the CIL facilitates the development and achievement of IL goals selected by individuals with significant disabilities who request assistance from the CIL; and . . . (5) That the CIL provides opportunities for consumers to express satisfaction with the CIL's services and policies in facilitating their achievement of IL goals and provides any results to its governing board and the appropriate SILC.	X X X X X	

COMPLIANCE INDICATOR 4 - COMMUNITY OPTIONS - COMMUNITY CAPACITY

In the reporting year, the CIL promoted the increased availability and improved quality of community-based programs that serve individuals with significant disabilities and promoted the removal of any existing architectural, attitudinal, communication, environmental, or other type of barrier that prevents the full integration of these individuals into society. During the reporting year, the CIL performed at least one activity in each of the following categories:

	YES	NO
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(a) Community Advocacy.	X	
(b) Technical assistance to the community on making services, programs, activities, resources and facilities in society accessible to individuals with significant disabilities.	X	
(c) Public information and education.	X	
(d) Aggressive outreach to members of 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.	X	
(e) Collaboration with service providers, other agencies, and organizations that could assist in improving the options available for individuals with significant disabilities to avail themselves of the services, programs, activities, resources, and facilities in the CIL's service area.	X	
Comments or recommendation:		

COMPLIANCE INDICATOR 5 - IL CORE SERVICES AND OTHER IL SERVICES

The CIL –

	YES	NO
(a) Provides information and referral services to all individuals who request this type of assistance or services from the CIL in formats accessible to the individual requesting these services; and	X	
(b) As appropriate in response to requests from individuals with significant disabilities who are eligible for IL services from the CIL, provides the following services: 1. Independent living skills training; 2. Peer counseling (including cross disability peer counseling); 3. Individual and systems advocacy; 4. Transition; 5. A combination, as appropriate, of any two or more other IL services.	X X X X X	
Comments or recommendation:		

COMPLIANCE INDICATOR 6 – RESOURCE DEVELOPMENT ACTIVITIES

	YES	NO
The CIL during the reporting year conducted resource development activities to obtain funding from other sources.	X	

Comments or recommendation:		
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SUBPART IIC: PROGRAM AND FINANCIAL PLANNING OBJECTIVES

	YES	NO
(a) The CIL has established annual and 3-year program and financial planning objectives.	X	
(b) The objectives include goals or a mission for the CIL.	X	
(c) The CIL has a current work plan for achieving the goals or mission and has included specific activities planned to meet the requirements in the indicators.	X	
(d) The work plan includes objectives and goals for obtaining and increasing funding from sources other than Title VII of the Act.	X	
(e) The work plan includes specific service priorities, and types of services to be provided.	X	
(f) The work plan includes plans for training governing board, employees, volunteers, and consumers.	X	
(g) The objectives and work plan are consistent with the current SPIL.	X	

NUMBERS AND TYPES OF INDIVIDUALS WITH SIGNIFICANT DISABILITIES RECEIVING SERVICES THROUGH THE CIL

CHECKSHEET	YES	NO
(a) The CIL’s management information system is adequately to record the following data about consumers: (1) Consumers served during the reporting year; (2) Consumers who became inactive during the year; (3) Consumers served during the year who remained active at the end of the year; (4) How long the consumer has been in contact with the CIL;	X X X X	
(b) Consumer Achievements: (1) Number of ILPs waived; (2) Number of ILPs developed; (3) Consumer goals set and met; (4) Age; (5) Gender; (6) Race/ethnicity; (7) Disability; (8) Living arrangements; and (9) Source of PAS (or availability.)	X X X X X X X X X	

SUBPART IIG: TYPES OF SERVICES PROVIDED THROUGH THE CIL AND THE NUMBER OF INDIVIDUALS WITH SIGNIFICANT DISABILITIES RECEIVING EACH TYPE OF SERVICE

	YES	NO
(a) The review of CSRs, data collection, and recording practices of the CIL demonstrate that the data reported is statistically accurate . . .	X	
(b) The CIL recorded either total hours of FTE expended on community services or otherwise recorded whether or not activities were conducted in any of the areas indicated. . .	X	
(c) The CIL records the numbers of consumers provided individual services.	X	
(d) The CIL has addressed a policy for volunteers to sign their confidentiality agreement, understand their direct line of supervision, and their Policy/Procedure/Operation manual.	X	

PART II ORGANIZATION AND ADMINISTRATION OF THE CIL

I - ORGANIZATION OF CIL

	YES	NO
(e) The CIL has an organizational chart indicating lines of authority and supervision.	X	
(f) The CIL has job descriptions for all personnel.	X	
(g) The staff knows what is expected of them and it is consistent with job descriptions.	X	

II - STAFF DEVELOPMENT AND TRAINING

	YES	NO
(a) The CIL assures the training needs of its staff are met.	X-NI	
Describe the process in (a): “The Training Plan does not require every staff person of the Center to complete each training, but rather each training must be completed by at least one staff person of the Center. Additional trainings may be provided and are indicated on Staff Training Logs.”		
(b) The CIL provides for staff development and training.	X	
Give examples of staff training: CIL Suite System, New/Updated Policies & Procedures, MOCIL Annual Meetings, MOCIL Workgroups, MRA Discussion with Dr. Temple Grandin, Missouri Open Door Workshop Series: Decreasing Social Isolation and Building a “Smart” Home.		
(c) The CIL has Governing Board training and development sessions/programs.	X	

III - POLICIES AND PROCEDURES

	YES	NO
(a) The CIL has policies and procedures for staff covering; (1) consumer service record management	X	

(2) confidentiality	X	
(3) personnel policies	X	
(4) travel policy and procedures	X	
(5) codes of conduct	X	
Comments or recommendation:		

IV - PERSONNEL POLICIES

	YES	NO
(a) There are personnel policies covering: (1) vacation and sick leave (2) working hours (3) activity reports (time sheets) (4) fringe benefits (5) wage and salary administration (6) performance appraisals	X X X X X X	
Comments or recommendation:		
(b) The CIL assures that all personal information about consumers served by the CIL, including names, addresses, photographs and other records are held confidential. (1) maintenance of records and files (2) conditions for releasing consumer data (3) confidential meetings at the CIL (4) publicity releases	X X X X	
Comments or recommendation:		

V - AFFIRMATIVE ACTION/NON-DISCRIMINATION

	YES	NO
(a) The CIL takes affirmative action to employ and advance in employment qualified individuals with significant disabilities.	X	
Comments or recommendation:		

VI - TRAVEL POLICIES (574.27)

	YES	NO
(a) The CIL has clearly defined staff and board travel policies.	X	

(b) Policies for travel expense reimbursement using federal funds are in accordance with state and federal requirements.	X	
(c) The policy provides for reimbursement by: (1) Actual expense- X (2) Per diem	X	
(d) All trips charged to the CIL are justified and documented by travel requests, time sheets, receipts, etc.	X	
Comments or recommendation:		

VII - INSURANCE COVERAGE

	YES	NO
The CIL has equivalent insurance coverage for real property and equipment acquired with federal funds as provided to property owned by the grantee.	X	

VIII – NON-DISCRIMINATION

	YES	NO
The CIL does not deny services to persons on the basis of their race, color, national origin, gender, age or the existence of a disability.	X	

IX - PROHIBITION AGAINST LOBBYING

	YES	NO
The CIL has a policy and procedures to guard against using Federal funds to influence or attempt to influence any agency or congress in connection with the making of any federal grant, the entering into of any cooperative agreement and the extension, continuation, renewal, amendment or modification of any federal grant of cooperative agreement, in particular, does the center provide evidence of compliance with OMB Circular A-122?	X	

X – DRUG-FREE WORKPLACE

	YES	NO
(a) The CIL conforms to the requirements of a drug-free workplace.	X	
(b) A statement is published notifying employees that the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited at the CIL and specifying the actions that will be taken against employees for violating the prohibition.	X	
(c) The CIL has established an ongoing drug-free awareness program.	X	

XI – FISCAL MANAGEMENT

	YES	NO

CIL ON-SITE COMPLIANCE REVIEW

(a) All required financial status reports accurately account for the CIL's funds.	X	
(b) Financial reports including those submitted to the board both of an internal nature and those required by the grant agency, are current and accurate.	X	
(c) The CIL has a written policy for consumer purchases.	X	
(d) The CIL has a written policy for center purchases.	X	
(e) The receipt of goods/services is documented to support payment for them.	X	
(f) Procedures are followed to assure expenditures are consistent with the approved budget of the CIL.	X	
(g) Case Service Records (3) reviewed during the financial audit accurately reflect purchase request and all financial documentation needed to confirm services rendered. <u>MVR is no longer reviewing (3) Case Service records as part of the financial review.</u> Expenditures were reviewed for the CIL's IL Grant. The CIL provided supporting documentation to match the documented expenditures on the Quarterly Financial Reports submitted to MVR.		

FINDINGS / RECOMMENDATIONS:

The VR IL Monitoring Team reviewed policies, procedures, operations manuals and conducted interviews with members of the Board of Directors and IL Staff. The Review conducted electronically found no indication of major weaknesses in the day to day operations of the CIL.

The North East Independent Living Services (NEILS) Center Staff and Board provide services by continuing to **enhance the rights and independence of people with disabilities to actively participate in their communities and to live self-determined lives.**

For this 2021 On-Site Compliance Review, documentation and discussion with Board and Staff indicates NEILS continues to work with consumers by providing the 5 Core Services along with additional services. Despite COVID-19, NEILS Executive Director reported that the number of Consumers seeking services from the Center increased during the year. The VR IL Team commends the Executive Director, as well as the Center Staff, as they moved to a new building during the trying year, all while continuing to provide valuable services without interruption.

The Board of Directors at North East Independent Living Services (NEILS) is made up of dedicated Members with various experiences who serve as the principal decision makers of and for the Center. The Center has at least 51% of the Board Members who are individuals with disabilities. NEILS proudly reports that seven of the 11 Board Members are Consumers, truly epitomizing the IL Philosophy of *consumer control*.

Though not a Finding for this 2021 On Site Compliance Review, it is noted that far less training than planned was provided to Staff Members, influenced by the COVID-19 pandemic. Training was impacted during 2020. The IL Summit's scheduled Board Training was postponed then cancelled. Fewer Staff Meetings occurred due to need for social distancing, resulted in less Staff Training. During interviews, both Staff and Board Members were eager to learn of additional training resources; the VR IL Team did encourage to visit such as ILRU website and the Department of Elementary and Secondary's Independent Living webpage for training resources.

Recommendations for 2021 Board and Staff Training:

Schedule NEILS-developed needed and required Trainings with adaptation for alternative methods of Training should face to face trainings be unavailable, incorporate web-based training through such as ILRU, with accountability and attendance records to demonstrate Board and Staff Training completion. Staff Meeting Minutes, as the Board Meeting regularly develops post Meeting, supports details discussed and Minutes are a requirement for OSCR standard.

CSR Review:

Due to COVID-19 Safety Considerations, ACL did grant the Missouri VR IL Team flexibilities to conduct the CSR Reviews virtually this year. The CSR documentation provided reflects a clear understanding and the provision of the Independent Living Core Services to their Consumers. The case files were in general well documented and demonstrated a wide range of quality services to Consumers. CSR documentation provided for this Review demonstrates Consumers are provided the services they request, that Consumers appear to be informed of additional services NEILS provides and are often then provided with additional categories of Center services to assist them to live more independently in their own homes. Documentation demonstrates that Consumers are provided follow along and follow-up contacts in support while in services throughout the life of the case. Additionally, NEILS adapted their service delivery model quickly at the Missouri onset of the COVID-19 pandemic and has continued to provide ongoing full-range Center Services.

A total of 10 cases were reviewed: five Open and five Closed cases. Clearly, NEILS has adapted CSR documentation to ensure specific standards of OSCR are met in each CSR reviewed.

- a) Documentation provided for this Review within the CSRs demonstrated NEILS's system for listing Consumer eligibility or ineligibility for services (only those eligible are served), selection of ILP or selection of Waiver stating the ILP is not necessary, information on the services requested by, and the services provided to or arranged for the Consumer, IL Goals or objectives established with the Consumer-whether or not in the ILP, that the Consumer *has the right* to develop or waive the development of the ILP, a narrative or Social History, documentation that the Consumer was notified of rights and responsibilities and received information about Consumer Assistance Program (CAP).
- b) Though it was clear through documentation provided for this Review that NEILS Staff is documenting services provided, along with the progression of those services as needed, the frequency of documenting Consumer beliefs about Goals or objectives in progress or achieved and the frequency of

the opportunity for Consumer to express satisfaction with NEILS services and policies would demonstrate overall Consumer input about their services during the life of the case.

CSR documentation provided for this Review demonstrates NEILS has worked diligently over the years to increase the documentation standards to meet the Federal and State requirements for demonstrating the provision of Consumer services within the CSR. It would appear NEILS has trained Staff on these standards and modified their data management system to prompt Staff to complete documentation as required. This VR IL Review Team encourages NEILS to continue this Staff training throughout each year to ensure newly hired and seasoned Staff understand the purposes for the standards and that all Staff follow the NEILS protocol for excellence in CSR documentation.

Conclusion:

NEILS continues to provide quality services to Consumers within their service area.

All *Recommendations* are reviewed with the Executive Director OSCR Review Meeting. A copy of this Report will be emailed to Executive Director within 24 hours of this Meeting.

The VR IL Team welcomes ongoing communication on these topics and all IL business at any time. Your next OSCR will be during 2023.