

## Compliance Review Document Uploads

GrantSolutions is the grants management service used by CIL grantees for many grant-related tasks. All CIL grantees have an active GrantSolutions account with established user access.

All documents requested during the course of a CIL compliance review are uploaded by the grantee into the Grant Notes portal of GrantSolutions according to the timelines provided during the review.

**IMPORTANT NOTE:** ALL DOCUMENTS ARE TO BE UPLOADED INTO THE GRANT FILE FOR THE AWARD YEAR BEING REVIEWED.

Document upload instructions:

1. Log into Grant Solutions.
2. Click on the "GRANT NOTES" link on the right of the My Grants List screen for the grant award that is being reviewed. A new window will appear. **Ensure you are uploading to the Grant Note for the award year being reviewed.**
3. Scroll down and click on "ADD"
4. Enter the required information in the "GRANT NOTES" fields. Please specify what document you are uploading with clarifying document names e.g. "COMP\_DocumentDescription"

To attach a document to the note:

1. Click on "Browse" in the Note Attachments section and select the report to add
2. Click on "UPLOAD" to attach the file in "GRANTS NOTES"
3. Once you have uploaded the file, click "ADD" to attach the note

\*To cancel this action and return to "MY GRANTS LIST", click "CANCEL" at any time.

Once the note has been attached, you will be able to View, Edit, or Delete the note. Only the user who created the note will be able to make modifications to it.

When uploads are complete, notify the review lead. If you have questions, please contact the review lead.



## Compliance Review Document Request

The below list of documents are necessary for the Administration for Community Living (ACL) to conduct a thorough compliance review. Documents should be uploaded to GrantSolutions within 10 business days of receiving the document request (See Compliance Review Document Upload sheet). **Documents will only be accepted through GrantSolutions.** If a requested document is NOT available, select Not Available for that document. Follow up will be provided.

If additional time is needed, contact the review lead as soon as possible to discuss the document request requirements.

Date Documentation Request Provided to CIL: \_\_\_\_\_

Date Documentation Due to OILP: \_\_\_\_\_

### Legal Documents

| Documentation Requested   | Provided | Not Available |
|---|----------|---------------|
| 1. 501(c)(3) certificate  |          |               |
| 2. Bylaws   |          |               |
| 3. IRS Forms 990 and supporting documents (current and previous year) |          |               |
| 4. Original approved application for Part C funding                   |          |               |

### Organizational Documents

| Documentation Requested   | Provided | Not Available |
|---|----------|---------------|
| 5. Mission statement/program descriptions   |          |               |
| 6. Organizational chart   |          |               |
| 7. Staff roster, including disability status  |          |               |
| 8. Staff job descriptions   |          |               |
| 9. Agency policies and procedures   |          |               |
| 10. Evaluation of the Executive Director  |          |               |
| 11. Employee Handbook   |          |               |
| 12. Agendas and meeting minutes of the governing board (most recent and last four (4) meetings) |          |               |

| <b>Documentation Requested</b>                | <b>Provided</b> | <b>Not Available</b> |
|---|-----------------|----------------------|
| 13. Board roster, including disability status |                 |                      |
| 14. Board policies and procedures             |                 |                      |

### **Fiscal Documents**

| <b>Document Requested</b>   | <b>Provided</b> | <b>Not Available</b> |
|---|-----------------|----------------------|
| 15. Copy of the organization's written policies regarding payroll process which may include accounting and approval   |                 |                      |
| 16. Copy of an approved payroll period personnel record document  |                 |                      |
| 17. Evidence of resource development activities e.g. contracts, grant awards, MOUs, etc.  |                 |                      |
| 18. Evidence of how the organization is tracking program income earned by resource development activities   |                 |                      |
| 19. Copy of organization's internal approval process for purchase orders including equipment  |                 |                      |
| 20. Copy of an approved voucher or invoice payment form (3 samples)   |                 |                      |
| 21. Copy of the organization's travel reimbursement policies  |                 |                      |
| 22. Copy of a travel request approval (3 samples)   |                 |                      |
| 23. A copy of written policy and explanation of how the organization reviews and approves changes of key personnel and requests ACL prior approval for such changes |                 |                      |
| 24. Copy of written policies on working budget review and approval and include key individuals and roles/responsibilities   |                 |                      |
| 25. Copy of the approved working budget for the current Fiscal Year   |                 |                      |
| 26. Copy of the organization's current approved indirect cost rate agreement (if applicable)  |                 |                      |
| 27. Copy of the organization's record retention policy for documents and records associated with Federal awards   |                 |                      |
| 28. Copy of a signed Final SF-425 for the Fiscal Year being reviewed and the PMS Federal Cash Transaction Report (FCTR)   |                 |                      |
| 29. Copy of submitted SF-428 and/or SF-429 (if applicable)  |                 |                      |
| 30. Copy of an equipment purchase approval(3 samples)   |                 |                      |
| 31. Copy of organization's property records (if applicable) that includes the requirements found in 45 CFR 75.320(d)(1)   |                 |                      |
| 32. Documentation of organization conducting physical inventory of the property and results reconciled with the property records at least once every two years      |                 |                      |
| 33. Copy or explanation of the control system developed to ensure adequate safeguards to prevent loss, damage or theft of the property                              |                 |                      |

| Document Requested   | Provided | Not Available |
|--|----------|---------------|
| 34. Copy of the insurance coverage for real property or equipment valued over \$5,000  |          |               |
| 35. Copy of an MOA, MOU or agreement document between the organization and subrecipients and subcontractors. (if applicable) (3 samples) |          |               |

### Program Documents

| Documentation Requested  | Provided | Not Available |
|--|----------|---------------|
| 36. List of consumers for the identified review period *see note below   |          |               |
| 37. Service delivery policies and procedures   |          |               |
| 38. Sample of outreach materials   |          |               |
| 39. Copy of consumer grievance procedure   |          |               |
| 40. Copy of consumer confidentiality policy  |          |               |
| 41. Sample of consumer satisfaction surveys  |          |               |
| 42. Board Approved annual and three-year program/financial planning objectives, including the work plan for achieving the goals and objectives |          |               |

**NOTE: This is not intended to be an exhaustive list of items.** 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 and requested either prior to the review or onsite.

\*The list(s) of all consumers served during the reporting year should be identified by:

- consumer information files opened during the reporting year;
- carried over from a prior year; and
- closed during the reporting year with all goals met.

In addition, please include aggregate consumer information such as ILPs/waivers, race-ethnicity, disability, etc.

## Grantee Review Checklist

- Identify staff to participate in the review process.
- Prepare State of the CIL PowerPoint, including but not limited to (plan for 45 min-1 hr):
  - Overview of Center
  - History of Center
  - Successes and Challenges
  - Demographics
  - How CIL meets SPIL goals and objectives
  - Work plan from the PPR
  - Overview of each program
- Complete the CIL evaluation tool
- Submit the completed CIL evaluation tool and relevant supporting document to Review Team
- Identify consumers to be interviewed by team
  - Provide background information to interviewers
  - Secure releases
- Secure, as needed, meeting space and manage other logistics (e.g., phone lines, videoconference)

# CIL Accessibility Checklist

*\*Confirm with a review of policies and procedures*

## **Physical Accessibility:**

- The CIL is accessible by public transportation, if locally available
- CIL has visible signage to accessible entrance
- Clear accessible pathways to and from the entrance of the CIL
- Accessible parking available with van parking
- The surface of parking lot is smooth, stable, and virtually level in all directions (i.e. no gravel, sand/dirt, etc. )
- Automatic doors
- Firm, stable, and slip resistant interior flooring
- Furniture is arranged where someone who uses a wheelchair could easily navigate
- Wide doorways, aisles, and walkways cleared from obstruction
- Ramps and/or elevator/s, as appropriate
- Accessible Restrooms (sufficient space to enter, maneuver & grab bars, no obstruction under sink, for wheelchair foot pedals)
- Light switches at an appropriate height
- Doors have levers, not knobs
- Kitchen facilities, if available, is accessible
- Microwave, if available, is accessible and includes braille or raised markers
- Vending machines, if available, have braille or raised markers
- Fragrance Free policy with signage indicating no fragrance zone
- No scented flowers, soaps, sprays, lotions and perfumes
- Tactile signage to designate rooms (i.e. name plates, restroom signage, etc.)
- Workstations made accessible to meet needs of staff
- Brochures, resources, display racks hung at an accessible level

# Consumer Information File Checklist

The purpose of the CIF review is to validate CIL PPR data and determine to what extent: a CIL is in compliance with requirements for maintaining required consumer documentation; the CIL is providing the IL core services; and the center is serving a cross-disability population.

Reviewer:

CIF Identifier (e.g., last name/initial, file number):

CIF: E-copy \_\_\_\_\_ Hard Copy \_\_\_\_\_

Date CIF Opened:

Date CIF Closed (if applicable):

CIF Status:

- Active
- Closed with all Goals Met
- Closed for other Reason

## A. Documentation Required

Eligibility or ineligibility determination signed and dated by IL staff member  Yes  No

IL services requested by the consumer: \_\_\_\_\_

ILP OR  Waiver (signed by consumer and IL staff member)

IL services provided: \_\_\_\_\_

*Recommendation: Including the IL core services?*

IL goals or objectives established with the consumer (whether or not in ILP)  Yes  No

*Recommendation: Truly goals or merely services?*

IL goals or objectives achieved by the consumer  Yes  No

Clearly Stated  Not Clearly Stated  Missing

CIL's facilitation of goal development, pursuit, or achievement  Yes  No

Clearly Stated  Not Clearly Stated  Missing

ILPs include anticipated duration of the service program and each component service.  Yes  No

ILP review (at least annually) to determine whether services should be continued, modified, or discontinued and/or individual referred to another program, including VR, as appropriate.  Yes  No

Release of information form signed by the consumer or authorized representative (as required/needed)

Yes  No

Notification about consumer opportunity to express satisfaction or dissatisfaction  Yes  No

Notification about the Client Assistance Program (CAP), with availability of accessible formats  Yes  No

Notification about consumers' ability to appeal CIL's decisions  Yes  No

Notification about alternative format and communication modes availability  Yes  No

**B. Best Practices**

Notification of the Right to an ILP or Waiver  Yes  No

Notification about closure of the CIF  Yes  No



**PERSONNEL RECORDS CHECKLIST**

Completed By: \_\_\_\_\_ Date: \_\_\_\_\_

Number of staff records reviewed: \_\_\_\_\_ (10 max)

- Conflict of Interest form  
O O O O O O O O O O
- Evals – annual signed by appropriate person  
O O O O O O O O O O
- Drug free statement – look for annual statement  
O O O O O O O O O O
- Confidentiality form  
O O O O O O O O O O
- Application/Resume  
O O O O O O O O O O
- Signed Duty statement  
O O O O O O O O O O
- Training Plan  
O O O O O O O O O O
- Evidence of training participation  
O O O O O O O O O O
- Records kept in safe, locked location?
- Who has access?
- Any issues of concern?

NOTES:

# Glossary

Based on definitions in the Rehabilitation Act of 1973, as amended (the Act) and the regulations at 45 CFR 1329.

## Advocacy

45 CFR 1329.4 Pleading an individual's cause or speaking or writing in support of an individual. To the extent permitted by State law or the rules of the agency before which an individual is appearing, a non-lawyer may engage in advocacy on behalf of another individual. Advocacy may—

- (1) Involve representing an individual—
  - (i) Before private entities or organizations, government agencies (whether State, local, or Federal), or in a court of law (whether State or Federal); or
  - (ii) In negotiations or mediation, in formal or informal administrative proceedings before government agencies (whether State, local, or Federal), or in legal proceedings in a court of law; and
- (2) Be on behalf of—
  - (i) A single individual, in which case it is individual advocacy;
  - (ii) A group or class of individuals, in which case it is systems advocacy; or
  - (iii) Oneself, in which case it is self advocacy.

## Center for Independent Living

45 CFR 1329.4 A consumer- controlled, community-based, cross- disability, nonresidential, private nonprofit agency for individuals with significant disabilities (regardless of age or income) that—

- (1) Is designed and operated within a local community by individuals with disabilities;
- (2) Provides an array of IL services as defined in section 7(18) of the Act, including, at a minimum, independent living core services as defined in this section; and
- (3) Complies with the standards set out in Section 725(b) and provides and complies with the assurances in section 725(c) of the Act and § 1329.5.

## Compliance

Meeting the requirements of the Act, its implementing regulations, the Uniform Administrative Requirements at §45 CFR 75, and sub regulatory guidance issued by ACL.

## **Consumer**

An individual with a disability that requests and receives independent living services provided at a Center for Independent Living.

## **Consumer Control**

45 CFR 1329.4 With respect to a Center or eligible agency, that the Center or eligible agency vests power and authority in individuals with disabilities, including individuals who are or have been recipients of IL services, in terms of the management, staffing, decision making, operation, and provision of services. Consumer control, with respect to an individual, means that the individual with a disability asserts control over his or her personal life choices, and in addition, has control over his or her independent living plan (ILP), making informed choices about content, goals and implementation.

## **Client Information File**

Electronic or hard copy file documenting the IL services that will be and/or were provided by the CIL to the consumer. The CIF *must* include a copy of the signed Independent Living Plan (ILP) or waiver, with the *signatures of the consumer and the CIL service staff* that facilitated the services for the consumer to attain his/her goal. Electronic signatures are acceptable. All consumers that receive services beyond Information and Referral (I&R) must have goals to be achieved either in an ILP or waiver.

## **Culturally Competent Services**

Services that are responsive to the beliefs, interpersonal styles, attitudes, language and behaviors of those receiving the services; services that respect the cultural differences and preferences of the individual.

## **Independent Living Core Services**

Title 29, Chapter 16, Sec 7 (17) For purposes of services that are supported under the ILS or CIL programs, the core services required by the Act include:

- (A) information and referral services;
- (B) independent living skills training;
- (C) peer counseling (including cross-disability peer counseling);
- (D) individual and systems advocacy; and
- (E) services that-
  - (i) facilitate the transition of individuals with significant disabilities from nursing homes and other institutions to home and community-based residences, with the requisite supports and services;

- (ii) provide assistance to individuals with significant disabilities who are at risk of entering institutions so that the individuals may remain in the community; and
- (iii) facilitate the transition of youth who are individuals with significant disabilities, who were eligible for individualized education programs under § 614(d) of the IDEA (20 U.S.C. 1414(d)), and who have completed their secondary education or otherwise left school, to postsecondary life.

### **Information and Referral Services (I&R)**

Provide information on and make referrals to programs and services addressing the needs of individuals with disabilities in the State.

NOTE: I&R is the only service that CILs may provide to individuals without disabilities.

### **Independent Living Skills Training**

Training provided to/received by consumers that encourage and lead to their participation in social and/or economic activities in the communities of their choice.

### **Peer Counseling**

A service that is conducted one-on-one or in a group setting involving a consumer and another individual or individuals. Peer counseling is provided by individuals who have personal experience with a disability, knowledge, and coping skills, to assist others with their disability related experiences. This includes cross-disability counseling.

### **Resource Development**

§ 725(b)(7) states: The center shall conduct resource development activities to obtain funding from sources other than this chapter.

Activities include, but are not limited to, applying for grants from private foundations, and/or city/county/state/federal government entities and offering a fee-for-service, such as ASL interpreters, transcription and/or Braille services.

### **State IL Network**

A state independent living (IL) network is comprised of entities who work in partnership to develop and maintain broad and diverse independent living services in the state. It is suggested the state IL network minimally include centers for independent living identified in the State Plan for Independent Living (SPIL) Section 3.1 (Existing Network of Centers for Independent Living), the Statewide Independent Living Council (SILC), the Designated State Entity (DSE) , and the State Vocational Rehabilitation (VR) agency in states where the VR agency is not the DSE.