Implementing a Gold Standard
Centers for Independent Living Program

Office of Independent Living Programs

Administration for Community Living

October 16, 2020

Goals for Today's Discussion

1. Why addressing consistent issues is an important conversation

2. Identify common issues

3. Moving forward

Overview

- Almost a year ago today OILP did a presentation regarding establishing the Gold standard and discussed the roles all the partners play

- This is the next phase- a discussion of lessons learned and trends identified

- Business acumen, compliance with relevant law/regulation and maximizing performance are all parts of the same goal- the Gold Standard!

The IL Network and Federal Staff Work Together!

Why is addressing these issues important?

- Are these legal requirements tied directly to use of the funds? Yes

- More importantly, successful compliance with these issues will improve performance!
  - More efficient and effective services
  - Easier and more productive resource development
  - Clearer and stronger case to funders and constituents!

- Ultimately this all leads to what we are all here for- increased independence of people with disabilities

Areas of Focus- Overview

- These represent trends identified by OILP across all activities.

- Can look different in different CILs

- Not necessarily true for any given CIL

- Are often tied to non-profit requirements separate from CIL program specific law and regulations.

Areas of Focus

- Policies and procedures- the foundation of compliance and performance

- CIFs and ILPs- Where your effort and impact is first documented

- PPRs- Your *performance reports*

Policies and Procedures- Thought Question

- On a scale of 1-10 how effectively does your CIL integrate effective policies and procedures into CIL operations?

- 1- What are those?

- 10- They form a clear and reasonable basis to support CIL operations and all staff/board are aware of and utilize our policies and procedures.

Policies and Procedures-why are they important?

- Good policies and procedures provide a legally compliant structure for CILs to act in an *efficient* manner

- Should represent board and staff priorities

- Demonstrate commitment to accountability

Policies and Procedures-why are they important, cont.

- Lead to more efficient activities, meaning more resources available for services

- Avoid common mistakes

Common Issues – Policies and Procedures

- Policies exist, but they don't include procedures.
    - Example: CIL will perform an annual inventory of equipment.
    - By who? When? How will you document?
    - What happens to the results?

- Policies are missing or incomplete, includes board, leadership and staff.
    - Requirements are documented in a number of sources

- Policies exist but haven't been reviewed or updated
    - Laws and requirements change
    - Organizations change Hint: if your policies reference 34 CFR or the OMB Circulars they are out of date.

Common Issues – Policies and Procedures, continued.

- Not sufficiently detailed to provide the needed tools.

- For example: Who is responsible for creation, validation and submission of required reports? Who has the password? What if staff change?

- Training and implementation are not consistent. When were staff last trained? How often do supervisors refer back to policies and procedures?

Areas of Policies and Procedures

- Financial Management
- Conflicts of interest/codes of ethics
- Board operations, building on bylaws
- Consumer services
- Personnel
- Health, safety and disaster planning
- Others?

Common Issues – Strategies to Improve

- Assure that ALL policies and procedures are reviewed at least annually and updated as needed.

- Involve the staff who actually implement the policies so you can work through the steps and make sure procedures are complete.

- Have a segment of every staff meeting to review some of the policies and provide training on them.

- Make sure the board has its own operational policies and procedures, which they will approve and update.

- How does your board address policy? We often speak of a "policy board" but also indicate that the board isn't in charge of day to day operations. Maybe your board approves policies and the staff approve procedures?

- Other ideas?

CIFs and ILPs- Thought Question

On a scale of 1-10, how sure are you that information garnered from CIFs/ILPs represents a full and accurate picture of your consumer needs and CIL impact?

1- Next question, please.

10- 100%.

CIFs and ILPs- Why are these important?

- Represent direct information on consumer goals, CILs response to these needs (services) and outcomes achieved.

- Treasure trove of data to make decisions and improve performance- but only if the information is timely and accurate. And then you need to USE it.

- Critical resource in developing additional funds

CIFs and ILPs- Why are these important, continued.

- The consumer/CIL staff partnership is key in developing and implementing effective ILPs. CILs are required to submit reports that are accurate and timely- good CIF/ILP practices are essential.

- If you are only collecting information for your funder, you've missed the point. How can staff, consumers and board benefit?

CIFs and ILPs- Common Issues

- Long gaps, occasionally more than a year, between documented contacts with consumers. (It is okay to discharge consumers when they meet their goal. You can reopen the file later if needed. But you must show attempts to contact them, offers to continue to assist them.)

- No internal processes or training to assure staff are proceeding in a consistent manner that meets needs.

- Lack of purposeful review strategies to assure consistent application of policies.

CIFs and ILPs- Common Issues, continued

- Lack of methods to validate numbers reported out of ILPs, including those use to meet Federal requirements.

- Lack of documentation that CIL and consumer looked at the whole person and issues that may be contributing to the areas addressed.

- CIL not using the information to drive agency activities.

CIFs and ILPs- Strategies to Improve

- Don't wait until the end of the grant year to check your figures. Produce a monthly or at most quarterly report and discuss at staff meeting.

- Break this out by staff person so they can check their own work as well.

- Ask questions in your consumer satisfaction surveys to determine effectiveness of planning strategies.

- Take advantage of training from the provider of your information software so you can maximize its use and value.

- Other ideas?

PPR's- Thought Question

On a scale of 10, how much does your CIL use the requirements of a PPR to help guide and improve agency performance?

1- Ummm, yeah… Next question, please.

10- We use the PPR and it's components as an annual review check on agency performance, both in terms of specific outcomes and long term goals.

PPR's-Why are these important?

- Form the basis of reports ACL uses to demonstrate impact of the IL program.

- Tool for planning and evaluation of CIL progress, both on a periodic and annual basis.

PPRs- Common Issues

- Material is copied and pasted from previous years
- Numbers in one section do not reflect narrative in another, often by underrepresenting CIL accomplishments
- Long term planning is either not being done, or not being reported. (Yes, you are required to have and report on your CIL's work plan or strategic plan.)
- Last second requests for extensions, occasionally for a wide variety of reasons

PPRs- Strategies to Improve

- Begin drafting your report as soon as the fiscal year ends – or sooner!
- If you identify gaps in your information, determine now, while the year is young, how you will resolve those in the future.
- Provide a summary and the actual report to your board. Is there anything unclear?
- Think about how you can use this annual information in your outreach and resource development.
- Others?

T/TA Center- Educators in IL

- Assist grantees in understanding federal regulations and requirements