

VIRGINIA CENTERS FOR INDEPENDENT LIVING
PROGRAMMATIC AND FISCAL POLICIES AND PROCEDURES



VIRGINIA DEPARTMENT OF REHABILITATIVE SERVICES
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Revised 2012

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I. Introduction

A. Mission Statement

“In partnership with people with disabilities, the Department of Rehabilitative Services provides and advocates for the highest quality services that empower individuals with disabilities to maximize their employment, independence, and full inclusion into society.”

In keeping with the provisions as set forth in Virginia Code, Chapter 4, Section 51.5-14 and Chapter 6, Section 51.23 through 29, and the guidance and direction of the Executive Branch of the Commonwealth of Virginia, the Department of Rehabilitative Services acknowledges and accepts its role in the development, coordination, and administration of an independent living program for persons with disabilities in Virginia. This role includes endorsement of, and commitment to, a philosophy of independent living and consumer control in the delivery and planning of services. The purpose of this manual is to provide guidance and clarification of policy for Virginia Centers for Independent Living in effectively administering their programs, complying with Federal and State law, and working in cooperation with the Department of Rehabilitative Services to offer high quality services to consumers and communities.

B. The Importance of Centers for Independent Living in Virginia

Consumers, staff, board members, and volunteers make the Virginia CIL program work within each CIL community. Their efforts, dedication, skills, knowledge, insight, leadership, and accomplishments are important and they do make a difference. The Virginia CIL program benefits residents of the Commonwealth by:

1. Providing a model for other businesses, agencies, organizations, and government entities of the philosophy of consumer control of services and equal access for persons with disabilities, particularly significant disabilities, to all aspects of home, work, family, community, and beyond.
2. Encouraging leadership among the ranks of persons with disabilities who can serve as role models for other persons with disabilities by gaining and maintaining independence in their own lives and by effectively advocating for themselves and for community change.
3. Educating individuals, groups, and communities about the abilities, rights, and responsibilities of persons with disabilities to fully participate in their homes, their relationships, their workplaces, their support systems, their communities, their state, their nation, and their world.
4. Advocating for community change, legislative action, removal of barriers, and quality of life for people with disabilities throughout the Commonwealth.

5. Providing the individual guidance and support that encourages and empowers Virginians with disabilities to attain the highest possible level of independence and self-determination in their lives.

II. Grants to Centers for Independent Living (CILs)

A. Eligible CILs

1. Any currently existing Center for Independent Living (CIL) in Virginia is eligible to submit an application to the Department of Rehabilitative Services for a grant for the purpose of operating a CIL. Consideration will be given to programs which demonstrate that they meet the definition of a CIL in Title VII of the Federal Rehabilitation Act of 1973, as amended. Title VII defines "center for independent living" (CIL) as a "consumer-controlled, community-based, cross-disability, nonresidential, private, nonprofit agency that is designed and operated within a local community by individuals with disabilities; and provides an array of independent living services."
2. Each Center shall serve an area established by the Statewide Independent Living Council and the Department of Rehabilitative Services (i.e., an agreed-upon legislative planning district which is an unserved or underserved area). The federal Rehabilitation Act, Title VII, definitions and requirements of CILs will be observed in establishing eligibility for the grant process. Each CIL must meet the standards and assurances (See Appendices #1) contained in Section 725 of Title VII.
3. CILs which receive Federal and/or State funds will be governed by a board of directors, comprised by a majority (51%) of members who have significant disabilities with cross-disability representation. The governing board shall establish and make available for review by all interested parties a list of current board members and their office, a set of bylaws, and minutes of board meetings (*FOIA ruling: opined* that an entity that receives two-thirds (66%) or more of its funds from public sources would be considered to be **supported ... principally by public funds**.² Prior opinions have also advised that money received from competitive grants and public contracts should not be considered public funding for FOIA purposes.³ that much of the money received by (CILs) is from "grants," also that these are **not competitive grants**. Competitive grants are akin to public contracts negotiated between independent parties at arms' length, and are not to be considered **public funds** for purposes of determining whether an entity is a **public body**.⁴ However, other grants that are more akin to appropriations or an exercise of governmental largesse may be considered **public funds** for FOIA purposes.is that in this case (CILs) receive this grant money through predetermined formulae under state and federal statutory requirements, and that there is no competitive process involved.⁵ As such, these grant monies are considered **public funds**. Following the two-thirds rule of thumb previously stated, (CILs) are a **public body** subject to FOIA because it is principally supported by public funds.

4. The CIL's proposal and budget must be reviewed and approved by the governing board.

III. Criteria for Awarding Grants

A. Grant applications for CIL operational funds are reviewed by DRS based on the following criteria:

1. Demonstration that the CIL complies with the standards and assurances (See Appendices #1) defined by the Rehabilitation Act of 1973, as amended, including the practice of consumer control in the design and operation of the program: obtaining consumer input, hiring and advancing qualified persons with disabilities, particularly persons with significant disabilities, and maintaining a governing board comprised in majority of persons with significant disabilities.
2. Demonstration that the CIL equitably serves localities and groups within its catchment area.
3. Demonstration that the CIL provides the four core services of information and referral, peer counseling, independent living skills training and individual and systems advocacy.
4. Demonstration that the CIL solicits and uses the input of consumers, including current and past users of CIL services in the CIL, regarding their level of satisfaction with the CIL and its services, their service needs, and their suggestions for improvements. (See Appendices #2)
5. Demonstration that the CIL provides additional services based on local need as determined through the above (#4) methods as well as input from the local community.
6. Demonstration that the CIL maintains appropriate records to validate the use of state and federal funds for its operation makes reports to DRS in a timely manner, and practices sound fiscal management. (Appendices #4, #5)
7. Demonstration that the CIL abides by all state, federal, and local laws and regulations which govern its operation. (See Appendices #3)
8. Demonstration that the CIL is a private, nonprofit, nonresidential center with 501C (3) status with the IRS.
9. Demonstration that the CIL maintains appropriate policies, procedures, and practices which govern CIL operation. These policies must include all items listed in this manual, as well as any additional issues related to the individual CIL program.

10. Demonstration that the CIL cooperates with DRS and the SILC in the collection and exchange of information, including evaluation of its program; determination of the level of consumer satisfaction with its program; disclosure of necessary records, reports, policies, and other documents for the purpose of evaluation; and the use of established data collection methods.
11. Demonstration that the CIL addresses local personal assistance services issues, including cooperation with DRS in the administration of the Personal Assistance Services (PAS) program. Such cooperation includes:
 - a. Serve as representatives on local Independent Living Advisory Boards or on any local or regional Long Term Care Coordinating organization which coordinates a variety of attendant/personal care/personal assistance services in a part of Virginia.
 - b. Provide, whenever possible based on funding and staffing levels, periodic recruitment, orientation, and training to potential personal assistants in order to maintain a registry of qualified individuals seeking work as personal assistants.

B. CIL Grant Process

1. The CIL Five-Year Continuation Grant Application must be completed by each CIL wishing to apply for continuation funds, whether the CIL is solely state-funded or receives a blend of federal and state funds. The application is reviewed by the DRS Director of Independent Living, and the Commissioner of DRS, using the criteria listed in section B. Once it is determined that the CIL has demonstrated that it meets the criteria, a continuation grant is awarded to the CIL.
2. Requests for application for continuation grants will be sent by DRS to CILs 4 to 6 weeks prior to the deadline for application. Notice of grant award (See Appendices #6) and transfer of funds by DRS to the CIL will take place no later than two weeks prior to the beginning of the fiscal year. The entire application must be completed and submitted by the due date in order to receive consideration for a continuation grant.
3. Grants to new CILs will be made when funding becomes available. The process for making such grants will be similar to the continuation grant process. Specific criteria will be used to review each application for new CILs.

IV. Center Services and Operations

A. Eligibility and Ineligibility:

Any person with a significant (sometimes referred to as severe) disability is eligible for CIL services. Eligibility shall be applied without regard to gender, race, creed, color, national origin, religion, or type of disability, or solely on the basis of age. The Virginia CIL program is focused on providing independent living services and advocacy for individuals with significant disabilities, who are unserved or underserved by other programs. CIL consumers will receive written notice of eligibility and ineligibility determinations, in accordance with the Rehabilitation Act of 1973, as amended. Core independent living services will be provided free of charge to persons with significant disabilities.

The Rehabilitation Act of 1973, as amended in 1992, defines “individual with a severe disability” as “an individual with a severe physical or mental impairment whose ability to function independently in the family or community or whose ability to obtain, maintain, or advance in employment is substantially limited and for whom the delivery of independent living services will improve the ability to function, to continue functioning, or move toward functioning independently in the family or community or to continue in employment, respectively.” As used in this manual “significant disability” means “severe disability.”

B. Service Delivery:

The purpose for Centers for Independent Living (CILs) in Virginia is to empower people with disabilities to direct their own lives. The program also promotes the participation of persons with disabilities in all aspects of community life, helping to remove attitudinal, physical, communication barriers through community education, and systems advocacy.

CILs provide services which are tailored to the individual by involving the consumer in every aspect of service delivery. The consumer shall, to the greatest extent possible, have the final word in the plan for CIL services to be received, the delivery of services, and the level of independence they wish to attain. The CIL shall inform the consumer of the right to establish a written Individual Independent Living Plan (IILP), which records mutual agreement regarding the services requested, promised, and obtained, and the timeline for such services. To the maximum extent possible, the consumer shall be present at all meetings regarding his or her involvement with the CIL.

Centers for Independent Living will provide services in the most expeditious manner possible.

In addition, the CIL will observe the following in service delivery:

1. The CIL shall seek other available resources in the community to avoid unnecessary duplication of services, and shall enter into cooperative agreements with other agencies and service providers when appropriate for the provision of effective and timely services.
2. The CIL shall serve persons with all types of significant disabilities.
3. Persons with significant disabilities shall be substantially involved in policy, direction, and management of the CIL.
4. The CIL shall provide for effective communication with consumers and the community, including the use of TTYs and other existing adaptive telecommunications equipment, the provision of certified interpreters for the deaf, the provision of “loop” systems for hearing aid users, the provision of captioned video-taped materials, the provision of audio-taped or Braille copies of printed materials, the provision of qualified foreign, native, or preferred language interpreters, and other appropriate means of removing communication barriers.

The Virginia Department for the Deaf and Hard of Hearing maintains information on manufacturers and suppliers of TTYs and loop systems, on obtaining captioned video-tapes and also on certified interpreters throughout the State.

The Virginia Department for the Blind and Vision Impaired Library and Resource Center, and the National Library for the Visually and Physically Handicapped have information on obtaining Braille or taped materials and adaptive playback equipment as well.

The CIL will identify local resources for foreign language interpreters. In some communities these services may be provided by the American Red Cross and the Catholic Diocese.

The CIL will undertake to resolve communication issues in the most effective manner available, taking steps to provide for future issues as well as immediate concerns.

5. The CIL will provide services to the community for the purpose of removing barriers to the independence of persons with disabilities in the general public. Such services include community education programs, advocacy with businesses, agencies, and government entities, legislative advocacy, and other activities which increase options and access.

C. CIL Services:

1. The following **Four Core Services** are to be provided by each Virginia CIL. As defined in the Rehabilitation Act of 1973 (Sec. 7 #29), they are:
 - a) Information and referral

- b) Peer counseling
 - c) Independent living skills training
 - d) Systems and individual advocacy
2. The CIL shall provide for as many as possible of the following additional services (from Sec. 7, #30 of the Act):
- a) Counseling services, including psychological, psychotherapeutic, and related services;
 - b) Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with disabilities);
 - c) Rehabilitation technology;
 - d) Mobility training;
 - e) Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services;
 - f) Personal assistance services, including attendant care and the training of personnel providing such services;
 - g) Surveys, directories, and other activities to identify appropriate housing, recreation opportunities, and accessible transportation, and other support services;
 - h) Consumer information programs on rehabilitation and independent living services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act;
 - i) Education and training necessary for living in the community and participating in community activities;
 - j) Supported living;
 - k) Transportation, including referral and assistance for such transportation;
 - l) Physical rehabilitation;
 - m) Therapeutic treatment;

- n) Provision of needed prostheses and other appliances and devices;
- o) Individual and group social and recreational services;
- p) Training to develop skills specifically designed for youths who are individuals with disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options;
- q) Services for children;
- r) Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance, of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with disabilities;
- s) Appropriate preventive services to decrease the need of individuals assisted under this Act for similar services in the future;
- t) Community awareness programs to enhance the understanding and integration into society of individuals with disabilities; and
- u) Such other services as may be necessary and not inconsistent with the provisions of this Act.

D. Staffing

Title VII of the Rehabilitation Act of 1973 requires that persons with disabilities will be substantially involved in policy direction and management of the center, and will be employed by the center. In addition, the following are required:

1. The Center shall employ qualified staff (specialists in the development and provision of IL services) to fill positions identified in the continuation application.
2. Emphasis will be given to employing and advancing in employment qualified persons with disabilities, particularly persons with significant disabilities, appropriately trained by experience or education, or a combination of both, to provide independent living services.
3. Employees of the Center shall be furnished with written and/or computerized staff policies and procedures governing conditions of employment, including job description.
4. The Center shall develop policies and procedures for any volunteers working in the Center.
5. Each Center will implement an Equal Employment and Affirmative Action plan as exemplified by DRS policy.

E. Facility

The Center shall provide for safe, accessible, and sanitary facilities appropriate for the services provided and for the needs of service recipients (Reference: Americans with Disabilities Act Accessibility Guidelines (ADAAG, 2004, and ANSI A 117.1-1980). Fire and safety protection shall be governed by the local applicable fire code for facilities. DRS strongly recommends that the appropriate nearest local fire station be informed of the nature of the facility, program consumers, and staff in case of an emergency.

F. Record Keeping

Program consumer service records shall be maintained in **strict confidentiality** and not released without the informed, written consent of the consumer (or their **legal** representative) in conformity with legal standards for human services practices and DRS guidelines. To the maximum extent possible, the consumer must be informed of the information release and approve of such release, even if they have a legally appointed representative.

Records required for DRS departmental and Federal and State regulatory and evaluation purposes shall be made available and their confidential nature shall be maintained throughout the process according to the provisions of the Freedom of Information Act and the Virginia Privacy Protection Act. **Participants and their legal representatives (if any) must be informed that the CIL will supply information to DRS and to the Federal government for these purposes.** In addition:

1. All consumer service records shall be retained for at least five years following closure or inactivity. When records which have been inactive over five years are destroyed, confidentiality measures must be taken (shredding, incinerating, etc.).
2. Personnel records for each staff member are required. These shall contain, at a minimum, the original employment application, selection criteria used, job description, leave information, and written periodic (at least yearly) evaluations. Confidentiality is to be maintained regarding personal information contained in personnel files in accordance with the Virginia Privacy Protection Act.

G. Reports

CIL Directors or other CIL representatives, the DRS Director of Independent Living, and the DRS program evaluation and policy units shall identify data elements and frequency for reporting requirements by the CILs, in accordance with State and Federal regulations. CILs will cooperate in the use of the established automated data collection system, I-Online, and will make available

report data to DRS on a **quarterly basis**. Financial reports, budget/expenditure line-item spreadsheets, and request for budget modifications will be **electronically** submitted to the DRS IL Unit on a **quarterly basis**.

SEE APPENDICES #7 (REPORT DUE DATE REFERENCE GUIDE)

H. External Audit, Internal Fiscal/Program Evaluation, and Control Self Assessment Questionnaire

1. External Audit

Center for Independent Living continuation grants are awarded annually for a 12-month period. Grantees receiving more than \$500,000 in federal funds will submit to the Grantor a copy of the current annual audit report and opinion letter covering the Grantee's fiscal year ending during the award period stated in this document. This audit will comply with requirements stated in the Office of Management and Budget (OMB) Circular A-133 (effective March 2007) and is due no later than December 31st of each year.

Grantees receiving less than \$500,000 in federal funds will submit to the Grantor a copy of the current annual audit report that complies with Generally Accepted Auditing Standards (GAAS). The audit report shall include a report(s) on the financial statements, compliance with laws and regulations, and internal controls over financial reporting and is due no later than December 31st of each year.

2. Fiscal Evaluation

DRS, as part of the Site Compliance Review, will perform a fiscal evaluation to determine the extent to which CILs are making prudent use of funds, utilizing funds for the purposes appropriated and awarded, documenting program expenditures and activities, and administering the project in accordance with sound management practices.

The CIL will repay non-compliant expenditures per the findings of the **"Final"** Site Compliance Review Report within 30 days following receipt of the final report.

3. Program Evaluation

An evaluation (See Appendices #8-CIL State Site Review-Protocol and Instrument) of each CIL and its programs will be undertaken by DRS on a regular basis. The evaluation activities require the cooperation of each CIL. The evaluation process will identify strengths and weaknesses in

CIL program administration and service delivery, and will provide a basis for program improvement and for sharing of best practices between CILs. The CIL will make such records available as are appropriate and necessary for an effective evaluation of the program. Participant information will be held in strict confidence by all reviewing parties, in accordance with the Virginia Privacy Protection Act. The evaluation will examine at a minimum:

- a) Accessibility of physical facilities of the program.
- b) Participant records for appropriate documentation of demographic, situational, and service needs information, consumer and CIL responsibilities, IILP goals and objectives, consumer progress, services received, follow-along activities, and other pertinent information.
- c) CIL policies and procedures manual for program operation, consumer and staff policies and grievance procedures, governing board bylaws and role in CIL operation, and fiscal policies and procedures.
- d) Statistics on outputs and outcomes of consumer and community service activities, measures of the effectiveness and efficiency of the CIL program and of involvement of persons with disabilities in planning and delivery of services, evidence of compliance with State and Federal regulations, and other appropriate information on the CIL's operations.
- e) Identification of new or expanded methods of improving the effectiveness and efficiency of the CIL program and recommendations of same to the CIL Board and Executive Director.
- f) The extent to which consumers, communities, and CIL consumers are satisfied with the CIL program.

A written report (within 30-45 days) of the evaluation findings will be presented by DRS to the CIL Board and Executive Director after the Site Compliance Review is completed. CIL staff and board members will have an opportunity to comment on the draft report (due within 30-45 days from receipt of DRS report). The final evaluation report will incorporate to the extent possible the CILs corrections and clarifications. The report will contain descriptive information and recommendations regarding the individual CIL program.

4. Control Self Assessment Questionnaire

This tool (See Appendices #11-Control Self Assessment Questionnaire) is provided to help the board of Directors (Board) and management of the CIL to assess whether or not adequate internal control processes, including checks and balances, are in place to ensure that assets are safeguarded, financial and operating information is accurately reported, and compliance with external laws and regulations is maintained.

The Control Self Assessment Questionnaire is to be completed and submitted with the renewal of the grant award.

V. CIL Policy and Procedures Manual

Each CIL shall develop and implement a policies and procedures manual which addresses, at a minimum, the components of this document and its appendices, and any amendments or additions to this document. As appropriate, CIL board, staff, and consumers shall have a voice in the development of the policies and procedures of the CIL, and the manual shall be approved by the governing board of the CIL.

An operational policies and procedures manual approved by the governing board shall be established and implemented by each Center and shall address Section I., Grants to Centers for Independent Living, and Section II., Center Services and Operations of this document. The manual shall also address the following **as appropriate** to the individual CIL program:

A. Staff Policy

1. Organizational Chart
2. Job Descriptions
3. Job Qualifications
4. Personnel Policy
 - a. Salary scales for each position
 - b. Leave time (including holidays)
 - c. Work schedule and verification of work time
 - d. Work site rules

- e. Staff training opportunities and procedures
- f. Career ladder
- g. Succession Plan
- h. AA/EEO, ADA, 504, Civil Rights policy
- i. Standards of conduct
- j. Performance evaluation
- k. Benefits
- l. Travel and expenses reimbursement (In accordance with state travel reimbursement policies and procedures) (See Appendices #9 - State Travel Reimbursement Policies and Procedures)
- m. Grievance procedure
- n. Employee separation
- o. Confidentiality (personnel and consumer)
- p. Staff political activity
- q. Conflict of Interest
- r. Code of Ethics
- s. Termination of employment

B. Fiscal Policy and Administrative Functions

- 1. Bookkeeping procedures
- 2. Check signature(s)
- 3. Authorized purchasing officer(s)
- 4. Submission of reimbursement documents
- 5. Documents requiring counter-signature,
- 6. Separate documentation (See Appendices #10 – Timesheet by Account/Funding Source) of staff time not 100% paid by contract with DRS
- 7. Program income and policies for its use

8. Liability insurance requirements
9. Leasing and other contractual agreements
10. Compliance with bonding requirements, if required
11. Licensure and certification compliance
12. Governing Board's By-Laws:
 - a) Criteria and procedures for nomination and selection of board members,
 - b) Expected qualifications of board members,
 - c) Number of board members,
 - d) Term of office,
 - e) Procedure for establishment of an executive committee, its membership requirements, and its function,
 - f) Board role and responsibilities in the administration of the center, including as appropriate:
 - g) Relationship of Board to Center administration and consumer control,
 - h) Specific responsibilities of Board in relation to role of CIL Executive Director,
 - i) Procedure for policy, planning, evaluation of Executive Director, and budget approval,
 - j) New board member orientation procedures,
 - k) Board training opportunities, and
 - l) Reimbursement for Center-related expenses,
 - m) Termination of board members,
 - n) Statement of the fiscal year observed by the CIL,
 - o) Procedures for amending bylaws, and
 - p) Policy concerning conflict of interest and code of ethics for board members.

C. Operational Policy

1. Program Description
2. Program Mission Statement
3. List of services
4. Geographic area served by CIL
5. Program goals
6. Procedures and local resources for the provision of effective communication for service recipients.
7. Reporting Procedures and Forms (What is to be documented, where, when, and by whom)
8. Repository for documentation for safekeeping
9. Recordkeeping standards
10. Program Self-evaluation (if in practice)
 - a) What is examined
 - b) How evaluation is undertaken
 - c) Who completes the evaluation
 - d) When evaluation occurs
 - e) How results of evaluation are used
11. Policies and Procedures Regarding Program Participants:
 - a) Eligibility and Ineligibility for CIL Services, including signed verification of eligibility by CIL staff.
 - b) Intake procedure.
 - c) Handling of consumer applications or referrals from other entities, and ensuring expedient service delivery.
 - d) Policies regarding any waiting list for CIL services.
 - e) Responsibility of Center to consumer (Confidentiality, Dignity, Empowerment, Self-Help, Self-Direction, Peer Support & Peer Relationships, etc.)
 - f) Responsibility of consumer (Self-Help, Confidentiality and dignity of other Participants, Self-Direction, etc.)

- g) Development of IILP
- h) IILP contents
- i) Notification of right to an IILP
- j) Procedure for waiver of IILP
- k) Documentation of consumer accomplishments in case file.
- l) Long-range goals
- m) Objectives
- n) Action steps
- o) Write-up, target, & completion dates
- p) Participant/CIL staff responsibilities
- q) Signatures
- r) Procedure for amending IILP
- s) Case documentation guidelines, procedures, and schedule for reviews and updates.
- t) Case closure procedures and schedule.
- u) Information to consumer regarding the Client Assistance Program (CAP) and internal CIL human rights policy.
- v) Appeals process in accordance with DRS Client Appeals Process [**NOTE:** Participants must be informed that they have the right to request a fair hearing without following the CIL's internal appeals process.].
- w) Participant/Consumer Advisory Group
- x) Role and function of advisory group
- y) How group affects operation of Center
- z) Bylaws or guidelines for group, including membership requirements, length of term, etc.
- aa) Services for which there is a fee
- bb) Fee scales
- cc) Eligibility

- dd) Purpose and rationale for the fee
12. Physical Facility
 - a) Other special arrangements/features, including accommodations and fully accessible features
 - b) Hours of operation
 - c) Parking, especially accessible parking
 - d) Fire evacuation plan
 - e) Safety features
 13. Automated Data Collection System
 - a) Written instructions on collecting, coding, programming, storing, retrieving data; report needs, frequency, and other items as appropriate to ensure efficient data management
 14. Standards for Volunteers
 - a) Participant confidentiality and dignity
 - b) Duties
 - c) Supervisor
 - d) Training and orientation
 15. Policies and procedures governing any special projects or services of the CIL (Personal assistance services at CIL functions, transportation, transitional living, etc.).
 16. Description of cooperative working arrangements (where no funds are exchanged).
 17. Contractual or Fee-for-Service Arrangements (where funds are exchanged)
 18. Information regarding appropriate licenses, insurance coverage, and certifications which the CIL holds.

VI. Fiscal Policies and Procedures

A. Fiscal Reporting Requirements

The Grantee will provide to the Grantor quarterly financial reports that coincide with the grant budget submitted by the Grantee. Centers maintaining an official Satellite Center for which state funding is awarded will submit separate quarterly financial reports for said Satellite. This report shall be submitted using a Quarterly Financial Status Report (Appendices #5), and a Line-Item Budget/Expenditure Spreadsheet (See IL Report Due Date Reference Guide (Appendices #7)).

The financial status report SF-269 reflects program income, cost sharing/matching, and indirect cost rates. (34 CFR 74.50)

Budget changes will be made and submitted to the Grantor for review and approval at least quarterly. Any fourth quarter changes shall be made and submitted to the Grantor no later than May 31st.

B. Accounting System

1. All organizations receiving state funding must maintain a formal accounting system.
2. The Center must ensure that:
 - a) Purchasing and payment functions are separated.
 - b) Payments are made only if disbursements or checks are counter-signed.
 - c) All funding sources are accounted for separately. (34 CFR 74.21(b)(4))
 - d) Expenditures are recorded by budget cost category and funding sources. (34 CFR 74.21(b)(3)(4), 34 CFR 75.702, 34 CFR 75.730)
 - e) All accounting records are supported by adequate documentation and entries are made on a timely basis. (34 CFR 75.702, 34 CFR 75.707, 34 CFR 75.730)
 - f) Payment vouchers are identified as to grant number, expense classification and transaction date, and funding sources. (34 CFR 74.21(b)(3))

C. Record Retention

Centers should maintain fiscal records for at least five years, or until audited by the Department of Rehabilitative Services Internal Audit Division.

D. Property Records

The Center must:

1. Maintain Property Records that contain: description of each piece of equipment; purchase date/cost; mfr's serial #, model #, Federal stock #, national stock #, or other ID #; source of equipment including award #; where title vests; information from which Federal participation can be calculated; location and condition of the equipment, date information was reported; and ultimate disposition. (34 CFR 74.34(f)(1))
2. Maintain a system for controlling inventory (general ledger control account, card reports, or property labels). (34 CFR 74.34(2)(f))
3. Keep all maintenance of property and equipment records. (34 CFR 74.34(f)(5))
4. Inventory property at least once every two years. (34 CFR 74.34(f)(3))
5. Ensure that adjustments to inventory accounts are made only on written authority of a designated official.
6. Guard against loss, damage or theft of property. (34 CFR 74.34(f)(4))
7. Have policies, procedures and controls for purchasing and disposing of property. (34 CFR 74.34(f)(6))

E. Contracts and Purchases with State Funding

1. The State maintains ownership of all goods purchased with state funding. The purchase of goods and services with State funding must be submitted as line item expenditures in the Center's proposed yearly budget. Purchases not submitted on the yearly budget but that are warranted at a later date may be submitted on a budget adjustment request PRIOR to the purchase of the goods or services. (34 CFR 74.25(b)).
2. The Center must ensure that it meets the following requirements (EDGAR - 34 CFR 74.40 - 74.48; OMB Circular A-110):

- a) The CIL has a written purchasing policy
- b) The policy complies with EDGAR
- c) The purchasing policies and procedures give adequate consideration to costs, quality, delivery, competitive bidding, inspection and acceptance
- d) The CIL must specify person(s) responsible for purchasing equipment and supplies
- e) The receipt of goods/services is documented to support payment for them
- f) There is separation of responsibility for the authorization for purchasing and the subsequent payment.
- g) When using grant funds to purchase equipment, the CIL has procedures to insure that such use is allowable and that the item is in the approved budget.
- h) Requisitions, purchase orders and receiving slips are pre-numbered and safeguarded.

F. Unspent State Funds

The Grantee will repay any unspent funds within 30 days following the close of each year of the grant award.

VII. Travel Regulations - Centers for Independent Living, when using state funds are required to follow the Commonwealth of Virginia State Travel Regulations. (See Appendices #9)

VIII. Working Lunches

- A. In most cases meals are not reimbursable unless overnight travel is involved. The exception to this rule is working meals provided during meetings or training events. Approval for these of meals is dependent on circumstance and justification. The following factors must be considered:
1. **Purpose** - State regulations require that a legitimate and substantive business topic or training agenda item must be covered during any meeting or training session where the approved lunch is being served. The topic must be clearly identified on the agenda for the meal timeframe.
 2. **Meeting Location** - The location of the meeting or training should play a major role in any decision to provide working lunches. The event coordinator should consider whether eating establishments are accessible and close before deciding to provide food. For example, if a meeting is being held at a location that serves food or has restaurants nearby, justification for a working lunch would have to be based on other factors such as time constraint or meeting participants with special needs.
 3. **Meeting Participants** - Some meeting or training participants may have significant disabilities that create mobility issues impacting their ability to leave a given facility for lunch. In these cases, there is a strong justification to provide a working meal rather than a lunch break.
 4. **Meeting Length** - As a general rule, meetings that begin after 10:00am and end before 3:00pm are not considered to be appropriate for working lunches.
 5. **Time Constraints** - If there are a number of agenda items to cover and a working lunch enables participant to cover everything in a day, a working meal is cost effective.
 6. **Budget** - In planning for meeting and training sessions, it is important to consider cost and budget impact. For meetings that require overnight travel by many of the participants, per diems would be involved with or without a working meal; therefore the fiscal impact of a working meal is less of an issue. On the other hand, if participants were traveling for the day, they would not ordinarily be eligible for a meal per-diem.
- B. Criteria for Working Lunches
1. During such meals, substantive and bona fide business discussions, training or speakers must be involved and noted clearly on the meeting agenda.
 2. A list, by name, of all persons involved in the meal is required for reimbursement.
 3. Reimbursement is for actual expenses up to the amount shown for the applicable meal in the M & IE Rate Table, excluding the incidental

allowance. The meal per diem listed in the M & IE Rate Table includes all cost for the meal including the tax, delivery fee, tip, and etc.

IX. Revision of the DRS CIL General Policies and Procedures Manual

The Department of Rehabilitative Services will periodically review the CIL General Policies and Procedures Manual and make changes as necessary. Changes will be conveyed promptly to Centers. Input on what is contained in the manual can be submitted to the DRS Director of Independent Living.