

**VIRGINIA CENTERS FOR INDEPENDENT LIVING
GENERAL POLICIES AND PROCEDURES MANUAL**



**VIRGINIA DEPARTMENT FOR AGING AND REHABILITATIVE SERVICES
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I. Introduction

A. Mission Statement

The Virginia Department for Aging and Rehabilitative Services (DARS) supports Virginians' efforts to secure independence, inclusion, and integration. DARS' mission is to improve the employment, quality of life, security, and independence of older Virginians, Virginians with disabilities, and their families.

Under Chapter 14, Article 10 of Title 51.5 of the Code of Virginia, DARS is authorized to make grants to Centers for Independent Living (CILs) to promote a philosophy of independent living to maximize the leadership, empowerment, independence, and productivity of individuals with disabilities and the integration and full inclusion of individuals with disabilities into society.

The purpose of this manual is to provide programmatic and fiscal policy guidance for Virginia CILs to effectively administer their programs, comply with Federal and State law, and work in cooperation with DARS 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 community. Their efforts, dedication, skills, knowledge, insight, leadership, and accomplishments are important and they 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 individuals with disabilities, particularly significant disabilities, to all aspects of home, work, family, community, and beyond.
2. Encouraging leadership among the ranks of individuals with disabilities who can serve as role models for other individuals 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 individuals 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 individuals 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.

C. Definitions

For the purposes of this manual, the following definitions apply:

“Individual with a disability” means an individual who—

- (1) Has a physical or mental impairment that substantially limits one or more major life activities of such individual;
- (2) Has a record of such an impairment; or
- (3) Is regarded as having such an impairment, as described in section 3(3) of the Americans with Disabilities Act of 1990 (42 U.S.C. 12102(3)). (34 CFR 1329.4)

“Individual with a significant disability” means 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, continue functioning, or move toward functioning independently in the family or community or to continue in employment, respectively.” (34 CFR 1329.4)

II. Grants to Centers for Independent Living

A. Eligible CILs

1. Grants for existing and new CILs are awarded in accordance with 22VAC30-30-131 and 22VAC30-30-141. Any existing CIL in Virginia is eligible to apply to the Department of Aging and Rehabilitative Services (DARS) for grant funding. Consideration is given to applicants that can carry out the purposes of Title VII of the Rehabilitation Act as amended, (the Act) and 22VAC30-30. To receive continued funding, CILs must demonstrate compliance with the CIL program, fiscal standards and assurances in the Act, 22VAC30-30-171, and 22VAC30-30-181. Grants to new CILs are awarded subject to the availability of funds.
2. Each CIL shall serve an area established by the Statewide Independent Living Council and DARS (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 contained in Section 725 of Title VII.
3. CILs must 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 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. According to a 2007 opinion from the Virginia Freedom of Information Advisory Council, CILs that receive more than 66% of their revenue from public funds are subject to the provisions in the Virginia Freedom of Information Act.
4. The CIL's proposal and budget must be reviewed and approved by the governing board.

B. Criteria for Awarding Grants

Grants to CILs are awarded in accordance with 22VAC30-30-131 and 22VAC30-30-141. Criteria include:

1. Demonstration that the CIL complies with the standards and assurances defined by the Act, 22VAC30-30-171, and 22VAC30-30-181 including consumer control in the design and operation of the program, obtaining consumer input, hiring and advancing qualified individuals with disabilities (particularly individuals with significant disabilities), and maintaining a governing board comprised in majority of individuals with significant disabilities.

2. Demonstration that the CIL equitably serves localities and groups within its catchment area.
3. Demonstration that the CIL provides the five core Independent Living (IL) services of information and referral, peer counseling, independent living skills training, individual and systems advocacy, and transition services.
4. Demonstration that the CIL solicits and uses the input of consumers (i.e., about their level of satisfaction with the CIL and its services, their service needs, and their suggestions for improvements) in the CIL's design, services, and operation.
5. Demonstration that the CIL provides additional IL services based on local need as determined through #4 above, input from the local community, and as the CIL has the capacity to provide.
6. Demonstration that the CIL: 1) maintains appropriate records to validate its use of state and federal funds in accordance with grant goals and compliance with requirements; 2) makes reports to DARS in a timely manner; and 3) practices sound fiscal management.
7. Demonstration that the CIL abides by all state, federal, and local laws and regulations which govern its operation.
8. Demonstration that the CIL is a private, nonprofit, nonresidential center with 501C (3) status with the IRS.
9. Demonstration that the CIL maintains policies, procedures, and practices adhering to appropriate DARS, Commonwealth of Virginia, and Federal requirements.
10. Demonstration that the CIL cooperates with DARS and the SILC in the collection and exchange of information, including: 1) evaluation of its program; 2) determination of the level of consumer satisfaction with its program; 3) disclosure of necessary records, reports, policies, and other documents for the purpose of evaluation; and 4) the use of required data collection methods.
11. Demonstration that the CIL supports DARS Personal Assistance Services, including promotion of or connection to the program.

C. Grant Process

1. The CIL Five-Year Continuation Grant Application must be completed by each CIL wishing to apply for continuation funds. The application is reviewed by DARS in accordance with the criteria listed in section A above and any additional criteria as appropriate (as indicated on the

application). A CIL is awarded funding upon determination that it meets the criteria adequately.

2. Applications for continuation grants will be sent by DARS to CILs 4 to 6 weeks prior to the deadline. Notice of grant award 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 to be considered for a continuation grant.
3. Processes for grants to new CILs will be announced when funding becomes available, subject to applicable requirements and stipulations.

III. Center Services and Operations

A. Eligibility:

Any individual with a disability (or “consumer”), particularly with a significant disability, is eligible for CIL services. Eligibility determinations should be made without regard to age, color, creed, gender, national origin, race, religion, or type of disability of the individual applying for IL services. The Virginia CIL program is focused on providing independent living services and advocacy for individuals with disabilities, who are unserved or underserved by other programs. CIL consumers will receive written notice of eligibility and ineligibility determinations. Core independent living services will be provided free of charge.

B. Service Delivery:

CILs empower individuals with disabilities to direct their own lives by achieving their independent living goals. CILs also conduct activities that increase community capacity to meet the needs of people with significant disabilities and promote equal access to services, programs, activities, resources and facilities. They promote the participation of individuals with disabilities in all aspects of community life, helping to remove attitudinal, physical, and communication barriers through community education and systems advocacy.

CILs provide services that are tailored to the individual by involving them in every aspect of service delivery. CILs must inform consumers of their right to establish or waive a written Independent Living Plan (ILP), which is an agreement on the services requested and provided. As consumer-controlled organizations, CILs should support individuals with disabilities’ control over their individual life choices and their ILP making informed choices about content, goals and implementation.

When providing services, CILs should:

1. Consider any similar benefits available to meet the cost of IL Services, except IL core services.
2. Serve individuals with a range of disabilities, particularly those with significant disabilities.
3. Vest 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.
4. Provide for effective communication with consumers and others, including the use of TTYs and other telecommunications equipment, provision of

language interpreters, provision of “loop” systems for hearing aid users, provision of captioned video-taped materials, provision of audio-taped or Braille copies of printed materials, and maintain resources and other appropriate means of removing communication barriers.

- The Virginia Department for the Deaf and Hard of Hearing, Virginia Department for the Blind and Vision Impaired, and the National Library Service for the Blind and Print Disabled maintain information and resources on effective communication.

5. Provide services to the community that remove barriers to integration for individuals with disabilities. Services include community education programs, advocacy with businesses, agencies, and government entities, and other activities which increase options and access.

C. CIL Services:

1. The following five IL Core Services must be provided by each CIL:
 - a) Information and referral
 - b) Peer counseling (including cross-disability peer counseling)
 - c) Independent living skills training
 - d) Systems and individual advocacy
 - e) Transition Services, which are defined as 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 section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)), and who have completed their secondary education or otherwise left school, to postsecondary life.
2. CILs may also provide the following other IL services:
 - 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 the Act and of the titles of the 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 the 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 and training in the use of public transportation vehicles and systems;
- 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 the Act.

D. Staffing

The majority of CIL staff and individuals in decision-making positions must be individuals with disabilities. CILs must:

1. Employ staff who are specialists in the development and provision of IL services and in the development and support of centers
2. Take affirmative action to employ and advance in employment, qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under § 503 of the Act
3. Maintain staff policies and procedures governing conditions of employment, and include job descriptions
4. Maintain policies and procedures for volunteers working in the Center

E. Facilities

The Center shall provide for safe, accessible, and sanitary facilities appropriate for the services provided and for the needs of service recipients. Fire and safety protection shall be governed by local applicable codes and requirements. DARS strongly recommends appropriate local first responders be informed of the nature of the organization, program consumers, and staff in case of an emergency.

F. Record Keeping

Consumer Information Files (CIF) (also known as Consumer Service Records (CSR)) shall be confidential and not released without the informed, written consent of the consumer (or their legally authorized representative) in conformity with legal standards for human services practices and DARS 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 authorized representative.

Records required for DARS evaluation purposes shall be made available upon request. Consumers and their legally authorized representatives must be informed that the CIL will supply information to DARS for these purposes.

In addition:

1. All consumer service records shall be retained for at least five years following closure or inactivity. When records that have been inactive for more than five years are destroyed, CILs should ensure that documents are destroyed securely (e.g. shredded, incinerated, etc.).
2. Information contained in personnel records should be confidential in accordance with CIL policies and other applicable requirements. These records should include the original employment application and relevant hiring information, job description, and written periodic (at least yearly) evaluations.

G. Electronic Record Storage

CILs may maintain CIFs (also known as CSRs), including written IL plans and waivers, as electronic documents in a secure network or cloud storage system. For example, a CIL choosing to store a CIF electronically may complete a written IL plan or waiver jointly with a consumer (inclusive of the consumer's signature), scan it to an electronic document format, and upload it to a secure network or cloud storage system that would allow for hard-copy retrieval as needed. Once stored securely, hard-copy documents may be destroyed in accordance with the CIL's document destruction policy. CILs should employ measures to protect electronically-stored documents against loss, including regularly backing up files.

If stored in this format, all required CIF elements, including the IL plans or waivers described in [22VAC30-30-70](#), must be clearly discernable and a hard-copy version must be easily retrievable from the secure network or cloud storage system. Each electronic CIF must be kept up-to-date and easily located by the individual's name. When implementing electronic CIFs, CILs must take steps to prevent unnecessary or unauthorized access to CIFs.

Electronically stored CIFs must be maintained in accordance with DARS regulations, contractual obligations, and policies, as well as any internal CIL policies. All consumer service records shall comport with [22VAC30-30-31](#). CIFs must be retained for at least five (5) years following closure or inactivity. If a CIL chooses to store CIFs electronically, once any hard copies are converted to electronic copies, the hard copies may be destroyed in accordance with the CIL's document destruction policy. CILs must develop and maintain policies and procedures for the implementation of electronic CIFs. Such policies and procedures must include but are not limited to: storage of electronic CIFs, access to electronic CIFs by employees, volunteers, and DARS monitoring staff; release

of personal information contained in the CIFs; electronic CIF record retention; and hard-copy document destruction (if applicable).

These requirements only apply to the delivery of IL services by CILs and do not apply to other services CILs provide, including but not limited to Vocational Rehabilitation services, Pre-Employment Transition services, and Medicaid services, or the completion of the Voter Registration Agency Certification.

H. Electronic signatures

CILs may permit individuals, guardians, parents, or other legally authorized advocates or representatives to use electronic signatures on IL plans, IL plan amendments, and IL plan waivers, or to obtain informed written consent in accordance with independent living services regulations. An "electronic signature" means an electronic sound, symbol, or process attached to or logically associated with a record and executed or adopted by a person with the intent to sign the record ([§ 59.1-480 of the Code of Virginia](#)).

Electronic signatures have the same effect as written signatures provided the CIL has developed and maintains policies and procedures that reasonably ensure the following:

1. The electronic signature is clearly discernable,
2. The electronic signature identifies the individual signing the document and the date of the signature,
3. The electronic signature cannot be altered once it is attached to a document,
4. Documents cannot be signed electronically by anyone other than the individual required to sign the document, and
5. Documents containing electronic signatures can be printed out upon request.

Documents containing electronic signatures must be maintained in accordance with DARS regulations, contractual obligations, and policies, as well as any internal CIL policies and procedures, and must be retained for at least five (5) years following closure or inactivity.

These requirements only apply to the delivery of IL services by CILs and do not apply to other services CILs provide, including but not limited to Vocational Rehabilitation services, Pre-Employment Transition services, and Medicaid services, or the completion of the Voter Registration Agency Certification.

I. Reports

CILs must provide quarterly and annual financial and program reports to DARS in accordance with the requirements and schedule specified in the terms of the grant award.

CILs will cooperate with DARS in any monitoring and evaluation activities deemed necessary or required under state or federal requirements. CILs must

make available all files, documents, and other information as requested by DARS to fulfil monitoring and evaluation activities.

J. Independent Audits, Fiscal/Program Evaluation, and Control Self-Assessment Questionnaire

1. Independent Audits

CIL continuation grants are awarded annually for a 12-month period. Grantees spending \$750,000 or more of federal funds will submit to DARS a copy of the current annual audit report and opinion letter covering the Grantee's fiscal year. This audit should comply with requirements in the Uniform Guidance (2 CFR 200) and is due each year in accordance with the schedule specified in the grant award.

Grantees spending less than \$750,000 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 each year in accordance with the schedule specified in the grant award.

2. Program and Fiscal Evaluation

DARS conducts fiscal monitoring regularly to ensure CILs are utilizing funds appropriately and employing sound management practices, including, maintaining adequate internal controls. CILs must cooperate with monitoring activities and completed any corrective actions that are required. CILs must repay inappropriate expenditures within 30 days of notification.

DARS also conducts program monitoring regularly to ensure compliance, identify strengths, and areas for improvement for each CIL. CILs must cooperate with monitoring activities and complete any corrective actions that are required.

Objectives of program and fiscal monitoring activities include:

- Assessing compliance with the assurances and evaluation standards in Sections 725(b) and 725(c)(3) of the Act, 45CFR1329, 22VAC30-30-117, 22VAC30-30-181 and the compliance indicators in 22VAC30-30-191;
- Reviewing the program operation, organizational structure, and administration of the CIL under Section 725(c)(1), (2), (5), and (6) of the Act, 45CFR1329, and 22VAC30-30;

- Reviewing documentation to verify the accuracy of the information submitted in the most recent Program Performance Report (PPR);
- Verifying that the CIL is managed in accordance with federal and state program and fiscal requirements;
- Assessing CIL activities' conformance with its work plan (developed in accordance with Section 725(c)(4) of the Act, 45CFR1329 and the application for state grant funding) and consistency with the Virginia State Plan for Independent Living;
- Identifying areas for improvement in the CIL's programmatic and fiscal operations and providing technical assistance resources;
- Identifying areas of exemplary work, projects, and coordination efforts and making this information available to the larger CIL community; and
- Providing an opportunity to share information with peers involved in CIL operation to enhance provision of IL services and/or minimize problem areas.

When monitoring visits are conducted, a written report of the evaluation findings will be presented by DARS to the CIL's governing board and Executive Director within 45 days. The final report will incorporate the CIL's input to the greatest extent possible. CILS are required to comply with corrective actions included in the report.

3. Control Self-Assessment Questionnaire

The Control Self-Assessment Questionnaire must be completed and submitted to DARS annually. This tool is provided to help the CIL governing board and management assess the extent to which adequate internal control processes are in place to minimize risk, ensure accuracy of reporting, and maintain compliance with requirements.

IV. CIL Policy and Procedures Manual

Each CIL must develop a policies and procedures manual that incorporates the requirements described in this manual and other relevant requirements. CIL board members, staff, and consumers should have a voice in the development of the policies and procedures and the manual shall be approved by the governing board.

The manual should also address the following as appropriate or necessary:

- 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 advancement
 - 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)
 - m. Grievance procedures
 - n. Employee separation
 - o. Confidentiality (personnel and consumer)
 - p. Staff political activity and lobbying

- 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 countersignature,
- 6. Separate documentation of staff time not 100% paid by contract with DARS
- 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) Governing board role and responsibilities in the administration of the center, including as appropriate:
 - i. Relationship of governing board to CIL administration
 - ii. Specific responsibilities of governing board in relation to the role of the CIL Executive Director,
 - iii. Procedure for policy, planning, evaluation of Executive Director, and budget approval,

- iv. New governing board member orientation procedures,
- v. Governing board training opportunities,
- vi. Reimbursement for CIL-related expenses,
- vii. Termination of governing board members,
- viii. Statement of the fiscal year observed by the CIL,
- ix. Procedures for amending bylaws, and
- x. Policy concerning conflict of interest and code of ethics for governing 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 document safekeeping
- 9. Recordkeeping standards
- 10. Program self-evaluation
 - a) What is examined?
 - b) How evaluation is undertaken?
 - c) Who completes the evaluation?
 - d) When evaluation occurs?
 - e) How results of the evaluation are used?
- 11. Policies and procedures regarding program participants:
 - a) Eligibility for CIL Services, including signed verification of eligibility by CIL staff.

- b) Intake/Application procedure.
- c) Handling of consumer applications or referrals from other entities and ensuring expedient service delivery.
- d) Policies regarding 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 individualized Independent Living Plan (ILP)
- h) ILP contents
- i) Notification of right to an ILP
- j) Procedure for waiver of ILP
- k) Documentation of consumer accomplishments
- 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 ILP
- 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
- w) Participant/consumer Advisory Group
- x) Role and function of Advisory Group
- y) Fee for service programs (including eligibility)

- z) Fee scales
 - aa) Eligibility
 - bb) Purpose and rationale for the fee
12. Physical Facility
- a) Accessibility
 - 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) Supervision
 - d) Training and orientation
15. Policies and procedures governing any special projects or services of the CIL (e./g. 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

V. Fiscal Requirements

A. Fiscal Reporting Requirements

CILs must comply with fiscal reporting requirements specified in the terms of the grant award. Failure to comply may result in a delay or termination of funds.

B. Accounting System

1. CILs must maintain a formal accounting system.
2. CILs must ensure that:
 - a) Purchasing and payment functions are separated.
 - b) Requirements for counter-signatures on disbursements or checks are addressed in each CIL's fiscal policies.
 - c) All funding sources are accounted for separately.
 - d) Expenditures are recorded by budget cost category and funding sources.
 - e) All accounting records are supported by adequate documentation and entries are made on a timely basis.
 - f) Payment vouchers are identified as to grant number, expense classification, transaction date, and funding sources.

C. Records Retention

CILs should maintain fiscal records for at least five years.

D. Property Records

CILs 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 funding source can be calculated; location and condition of the equipment, date information was reported; and ultimate disposition.
2. Maintain a system for controlling inventory (general ledger control account, card reports, or property labels).
3. Keep all maintenance of property and equipment records.
4. Inventory property at least once every two years.

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.
7. Have policies, procedures and controls for purchasing and disposing of property.

E. Purchases with State Funds

1. Goods and services purchased with State funding must be identified as line-item expenditures in the CIL's proposed yearly budget. The State maintains ownership of all goods purchased with state funding. Purchases of goods and services not specified on the yearly budget but needed at a later date may be submitted on a budget adjustment request prior to purchase.
2. The CIL must ensure that it meets the following requirements
 - a) The CIL has a written purchasing policy
 - b) The policy complies with Virginia procurement regulations as applicable
 - c) The purchasing policies and procedures give adequate consideration to costs, quality, delivery, competitive bidding, inspection and acceptance
 - d) Specific staff are identified as responsible for purchasing equipment and supplies
 - e) Receipt of goods/services is documented to support payment
 - f) There is separation of responsibility for purchasing authorization and 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 the annual grant award.

G. Travel

When using state funds, CILs are required to adhere to the Commonwealth of Virginia State Travel Regulations.