

## **NYS CIL Standards Questions and Answers**

1. It appears the new ACCES-VR special purpose release of information form requirement is only to be used in certain instances. The center's Ombudsman program doesn't allow us to enter personal consumer information from that program into our database. Is this form meant to tackle that issue? If so, wouldn't such a requirement jeopardize our grant with OFA? Or is this aimed at CDPA consumers and aids who might claim HIPPA protections? Who and when do I require that form be given to?

ANSWER: The special purpose release of information form is not meant to change the center's methods for tracking consumers in its Ombudsman program. The form is expected to be used on rare occasions when insurmountable obstacles exist for ACCES-VR to review consumer service records (CSRs) during a scheduled site review.

2. In the Self-Evaluation With NYS Standards under Standard 1 - Technical Assistance to the Community, the requirement that centers maintain documentation of the number of participants in technical assistance activities should be deleted, as it is not always possible to obtain that information.

ANSWER: Where possible, sign in sheets should be kept for these activities. When a sign sheet is not appropriate, then ACCES-VR would not expect a participant list to be available. However, information regarding the topic, date, and targeted audience should be maintained. The requirement that centers maintain documentation of technical assistance activities that includes topics, targeted audience and number of participants is not new and has been a requirement since 1998.

3. In the Self-Evaluation With NYS Standards under Standard 5 - Training and Technical Assistance Needs, subsection B. asks if a center purchased material and/or equipment with NYS ACCES-VR funds. What is the state definition of equipment that must be reported when it is purchased with state funds, and what is the minimum dollar amount that would require reporting a purchase?

ANSWER: NYSED Policy Advisory #01-05 Revised Grant Reporting Requirements for Equipment Purchases supersedes Appendix A-1 of the ILC/ACCES-VR contract under Property subsection A. The Policy Advisory raises the dollar threshold for classifying an item as equipment from \$1,000 to \$5,000 and only requires the maintenance of an equipment inventory and not its submission. The Policy Advisory defines equipment as an item of nonexpendable tangible personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more. For additional guidance, refer to the NYSED Policy Advisory #01-05 online at the ACCES-VR website in the ILC Toolbox under Contract Development at <http://www.acces.nysed.gov/vr/independent-living-centers-toolbox-service-providers>.

4. In Part 2: Direct Services and Statistical Report under section III. Total People Served, an instruction states Total Funding for III.D. Total People Served, which includes casual consumers receiving Information and Referral (I&R) services who are disabled, must equal the total reported for section V. Total County(s) Served Total Funding. It appears we are now required to maintain county of residence for casual/I&R consumers with disabilities that previously was not required. Please clarify.

ANSWER: We examined our language in the Appendix D and the instructions for counting people served by county. Based on the intention to correlate all people served with funding source and county, we in fact have added the data element of county of origin to the I&R People With Disabilities (PWD) count. The only alternative we can consider is eliminating the counting of I&R PWDs which would significantly diminish the overall number of people served counts for ILCs. Trend data for the five-year period 2007-2008 to 2011-2012 indicates that approximately 20 percent of all people served are I&R PWDs and nearly 40 percent of people with disabilities served are I&R PWDs. We need to know where these people using I&R are from to get a complete picture of how we are serving the various counties across the State. So yes, the new data collection revisions do need to contain up to three elements for an I&R consumer who identifies a disability: name, disability, and county of origin. We already need to ask for a name and disability to count someone as an I&R PWD and we do not believe that asking for county of residence is intrusive.

5. I am working on the new mid year report format. In the past I summarized all the technical assistance, now it seems I just check yes on the end of year report Self-Evaluation With NYS Standards under Standard 1 - Technical Assistance to the Community saying we kept a count and have documentation. We keep sign-in sheets and internal reporting forms that I have in the past used to create the summary on the mid year and end of year. Is the expectation that I still make the same summary but keep it in my files, or is it acceptable that I have all the sign in sheets and internal reporting forms (not counted or summarized)?

ANSWER: The reporting of Technical Assistance no longer requires lists of activities be submitted as part of the mid year and year end reports. Technical Assistance activities are to be reported only in the year end report Self-Evaluation under Standard 1 - Technical Assistance. By checking "yes" that the center maintained for verification purposes an unduplicated count of technical assistance activities, a center is indicating it has available a summary that includes all required information. If a center is asked to provide documentation, only the summary would be submitted. This would also apply to Standard 3 - Staff and Board of Directors Training and to Standard 4 - Determination of Community Need that have a yes/no question regarding the maintenance for verification purposes of an unduplicated count of activities.

6. We are having an issue with correlating the figure from III D in the data report (total consumers receiving direct services inclusive of family members, I&R PWD, Other non-disabled) with the response required in V (this section involves those where a

full CSR was completed –essentially fully completed Intakes with all data for a PWD). The figure in III D would necessarily be greater than the final total figure for item V. At least this is the way I comprehend things. Yet, the instruction accompanying item V states “Total served must equal the total reported in III D.” Please clarify for us.

ANSWER: By moving county served from section I. Demographic Data to the new section V. County(s) Served, county data is no longer based on the Consumer Service Records (CSRs). Section V. County(s) Served is intended to correlate all people served with funding source and county, including CSRs, I&R PWD, family members, and Other non-disabled. The totals for III. D. Total Funding and V. Total County(s) Served Total Funding must equal to account for everyone served.

7. On the data report, section III.Total People Served A, B, and C requires that each consumer served be counted identifying the relevant funding source(s). When a consumer is served through a team or braided service approach and receives various services through several funding sources, how do we determine which funding category to report the consumer under?

ANSWER: To determine the most appropriate funding category, it is necessary to first consider the services provided and then the staff providing the services. For example, a consumer who received the core IL services of peer counseling and skill training provided by staff funded through the State General Operation ACCES-VR contract would be reported under ACCES-VR Funding Only. Whereas, a consumer who is served under the Nursing Home Transition and Diversion (NHTD) waiver with peer counseling and skill training provided by staff funded through the DOH waiver would be reported under Other Funding. If the same consumer served by the DOH waiver also receives housing assistance and benefits assistance from either the same staff member whose position is supplemented with ACCES-VR General Operation contract funds or by another staff member funded only by ACCES-VR General Operation contract funds, then the most appropriate funding source is Multiple Funding.

8. When the Direct Services and Statistical Report asks for Total People Served, based on ACCES-VR Funding Only...are you referring to the ACCES-VR/ILC contract funding...or ALL ACCES-VR funding...which would also include some of our employment services funding (UCS and Supported Employment)? –OR- should that ACCES funding be considered as other funding? If you can clarify, that would be very helpful.

ANSWER: ACCES-VR Funding Only is intended to mean the State ILC General Operating Contract. Any other ACCES-VR funds, such as Unified Contract Services (UCS) and Supported Employment, would be reported as other funding.

9. When reviewing the requirements for the year end report including the Wage Reporting for ILC consumers a question arose; perhaps you can clarify. Can the

information reported in the Wage Reporting Worksheet include consumers who were assisted by IL staff ( for example - Independent Living Skills Specialists or Case Managers) to obtain competitive employment for at least 90 days during the reporting period **in addition** to those consumers working directly with a funded Employment Service Program (like ACCES-VR or OPWDD)? Thank you for any clarification you can provide.

ANSWER: The Individual Consumer Worksheet can include employment wage data for all consumers who were assisted to become competitively employed by any IL staff. As documentation, the consumer's case record must clearly show the connection between the employment outcome and the staff member's direct involvement.

10. We are preparing the year end report self-evaluation survey and need clarification about staff training in Standard 3. In this statement:

B. The CIL provided training to new staff using the ACCES-VR and New York State Independent Living Council (NYSILC) approved independent living history and philosophy training DVD or an acceptable written curriculum equivalent.

\_\_\_ Yes \_\_\_ No

1. New employees hired prior to September 1 of each contract year completed training and have evidence of a certificate of completion in personnel files.

\_\_\_ Yes \_\_\_ No

Does "certificate of completion" mean that we should have a complete separate or formal form or does a checklist on a new employee training form work for this?

ANSWER: For Standard 3, B 1 and B 2, the certificate of completion means a separate form. At the end of the IL history and philosophy training DVD is a test that must be completed. When completed, the DVD provides a certificate of completion that is to be printed and placed in the employee's personnel file. This is not a new requirement. For many years, it has been a contractual requirement in Appendix D that Centers are to use the VESID/ACCES-VR and NYSILC approved independent living history and philosophy training curriculum and have a certificate of completion in personnel files.

11. I am finishing up the revenue comparison sheet that is now required by ACCES-VR. On the last step it is unclear for the very last calculation what we are supposed to put for previous financial audit. Below are the instructions. Please clarify.

Item 7 – Change In Revenue

- Most Recent Financial Audit = Most Recent Financial Audit (Item 6) <minus> Previous Financial Audit (Item 6)
- Previous Financial Audit: insert amount from this report for previous contract period

ANSWER: In Item 7 Change In Revenue for the Most Recent Financial Audit column, we are looking for the change from the center's previous audit period to the most recent audit period, which are the audit periods used to complete the form. !

12. Are we supposed to get every consumer with a CSR to sign the authorization pertaining to NYSED's access to consumer files and have it in every file, or only when necessary? It wasn't clear as to whether this is a required part of every consumer file that has to be updated annually. Thanks.

ANSWER: Use of the special purpose release of information form is described as a special circumstance. If the ILC believes that HIPPA for instance prohibits ACCES to view CSRs then the form would need to be done. Generally, it is unnecessary and we have full access to consumer files as the State authorized entity to administer the program.