Rural Center for Independent Living

725 Compliance – Center for Independent Living

On February 13, 2024, the Nevada Aging and Disability Services Division (ADSD) conducted an onsite review of the Rural Center for Independent Living (RCIL) per the State Independent Living Council’s request to determine compliance with section 725 of the Rehabilitation Act. This was a follow-up to an initial visit conducted by SILC Executive Director, Dawn Lyons in November 2022.

The following is a summary of the findings of these two visits combined.

# Direct Service Summary

The RCIL provided evidence of information and referral, IL skills training, peer support, individual and systems advocacy, and youth transition services. The RCIL provides services on a one-on-one basis, but also hosts a weekly social event known as the “WRECK” club.

In FFY2022 the RCIL served 60 individuals and provided transition services to 8 youth. The WRECK club meets monthly and typical attendance is approximately 10 individuals. This level of service has been maintained throughout FFY2023.

The WRECK club serves a dual purpose of social activities as well as independent living training and peer support. Each meeting hosted includes training on topics such as individual rights under the ADA, healthcare access, or other resource information. The discussion is facilitated in a manner that allows individuals to support each other and share their experiences to help others in the group facing similar challenges. The information gleaned from these meetings is also used by the organization to inform their system advocacy priorities each year.

The RCIL recently transitioned to the C-CIL Suite, to manage their case files and data. While this transition is still underway, it will provide a clear path to data and reporting compliance.

## Demographic Summary

The following demographic summary was collected for FFY2022 in the initial site visit.

* Gender:
	+ Male: 32
	+ Female: 28
* Age:
	+ 18-22: 0
	+ 23-54: 34
	+ 55 and over: 26
* Ethnicity:
	+ Caucasian: 48
	+ Hispanic: 2
	+ Native American: 2
	+ African American: 1
	+ Multi-Cultural: 7
* Disability Type
	+ Physical Disability: 19
	+ Cognitive Disability: 1
	+ Behavior/Mental Illness: 8
	+ Vision Loss/Blind: 0
	+ Hearing Loss/Deaf: 1
	+ Multiple Disabilities: 37

# 725 Compliance Summary

The Aging and Disability Services Division utilized the CIL Evaluation Tool (2020) to evaluate 725 compliances. This tool includes two main parts: (1) Verification of Standards and Assurances and (2) Verification of Organization and Administration of the CIL. There are a total of 19 sections within the tool for evaluation.

## Part 1: Verification of Standards and Assurances

This part includes 12 sections for review. The table below summarizes the findings.

|  |  |  |
| --- | --- | --- |
| **Section Title** | **Score**  | **Notes** |
| 1. Governing Board
 | 5/5  | 100% of board has a disability.  |
| 1. CIL Employees
 | 2/2 | 3 total employees, 1 decision-maker with a disability.  |
| 1. Self-help and self-advocacy
 | 1/1 | WRECK club; support group  |
| 1. Peer Role Models
 | 1/1 | WRECK club  |
| 1. Equal Access
 | 3/4 | P&P promote access and accessibility; some of the physical space signage is missing.  |
| 1. Cross Disability Service Provision
 | 2/2 | N/A |
| 1. IL Goals
 | 15/17 | C-CIL suite is strengthening documentation around plans and goals; still transitioning to this system and expanding P&Ps to strengthen documentation efforts.  |
| 1. Community Options
 | 5/6 | Have evidence of outreach events, but need a formal mechanism to document efforts. Data not available to verify unserved or underserved outreach.  |
| 1. IL Core Services
 | 7/7 | Current Focus – housing and school advocacy for IEP.  |
| 1. Resource Development
 | 1/1 | Limited efforts, but reoccurring events such as Farmer’s Market.  |
| 1. Program & Financial Planning
 | 1/7 | Detailed 3 year financial plan; informal program planning through WRECK club.  |
| 1. PPR Accuracy
 | N/A | Not currently a Part C CIL.  |

Overall, the RCIL has demonstrated they met the assurances required in Part 1. There are opportunities to formalize documentation and planning efforts.

## Part 2: Verification of Organization and Administration of the CIL

This part includes seven (7) sections for review. The table below summarizes the findings.

|  |  |  |
| --- | --- | --- |
| **Section Title** | **Score** | **Notes** |
| 1. Organizational and Personnel Practices
 | 3/3 | Comprehensive personnel handbook  |
| 1. Staff Development and Training
 | 3/4 | ILRU training, job shadowing, and C-CIL orientation. No specific IL Specialist job description but duties within 3 position descriptions.  |
| 1. Conflict of Interest
 | 2/2 | Comprehensive personnel handbook  |
| 1. Confidentiality
 | 3/4 | Notice of Privacy Policy documentation missing.  |
| 1. Drug-Free Workplace
 | 2/2 | Comprehensive personnel handbook |
| 1. Nondiscrimination
 | 1/1 | Comprehensive personnel handbook |
| 1. Prohibition against Lobbying
 | 1/2 | Need policy regarding lobbying |

# Conclusion

The RCIL has been providing services in northern Nevada for the past 25 years and is working to formalize many processes to ensure future efforts to expand and develop the organization are successful. Based on the on-site reviews, including case file reviews, policy reviews, and the interview with RCIL Executive Director, DeeDee Foremaster, ADSD has determined that the RCIL appears to meet the minimum requirements of a center for independent living under section 725.