**State Rehabilitation Council (SRC)**

**Policy Committee Meeting**

**July 11, 2024, 10:00 – 11:45 a.m.**

Location: Department of Rehabilitation (DOR) Central Office, 721 Capitol Mall, Room 252, Sacramento, CA 95814

*Meeting Minutes*

*Approved on October 17, 2024*

Note: This committee meeting was held in accordance with California Government Code section 11123.5. There may be members of the public body who participated in meeting who were granted a reasonable accommodation per the Americans with Disabilities Act (ADA).

Attendance:

* SRC Policy Committee members in attendance (by Zoom): Chanel Brisbane, Ivan Guillen, Candis Welch, La Trena Robinson.
* SRC Policy Committee members absent: Theresa Comstock.
* SRC members in attendance: Brittany Comegna (by Zoom).
* DOR staff in attendance: Kate Bjerke (present at DOR’s Central Office), Jessica Grove (by Zoom), Petre Deliivanov (by Zoom).
* Members of the public in attendance (by Zoom): Bailey Shahmirzadi.

# Item 1: Welcome and Introductions

Chanel Brisbane, SRC Policy Committee Chair, welcomed attendees to the meeting. Members and attendees introduced themselves.

# Item 2: Public Comment

None.

# Item 3: Approval of the June 13, 2024 SRC Policy Committee Meeting Minutes

It was moved/seconded (Guillen/Robinson) to approve the draft June 13, 2024 SRC Policy Committee meeting minutes as presented (Yes – Guillen, Brisbane, Robinson), (No – 0), (Abstain – 0), (Absent for vote – Comstock, Welch).

# Item 4: Commission on Accreditation of Rehabilitation Facilities (CARF)

Brisbane explained that during the May 15, 2024 SRC Policy Committee meeting, Bjerke read a public comment submitted on March 12, 2024 by Jan Johnston-Tyler, Founder and CEO of EvoLibri. The public comment expressed concerns with the cost CARF accreditation. Based on this public comment, the SRC Policy Committee agreed to have CARF as a future agenda item, with the goal of understanding 1) what CARF is, 2) the regulations that require DOR service providers to be accredited, and 3,) why DOR values CARF accreditation and how it benefits DOR consumers. Brisbane then welcomed Petre Deliivanov, Chief of DOR’s Community Resource Development (CRD) Section, who shared the following information about CARF:

* CARF is an independent nonprofit organization that accredits human service providers since 1966.
* The accreditation process is detailed and involves a peer review survey, which can be conducted on-site or virtually, based on frequently updated international quality standards set by CARF.
* Facilities typically accredited include aging services, behavioral health, child and youth services, community services, medical rehabilitation, and opioid treatment programs.
* CARF standards cover various aspects such as service excellence, accountability, risk management, business strategy, organizational structure, financial stability, legal and ethical compliance, performance management, accessibility, staff qualifications, consumer satisfaction, and innovation in service delivery.
* The accreditation process for Community Rehabilitation Program (CRP) providers involves a specific manual called the *Implementing Community Services Standards Manual*, which includes areas like aspiring to excellence (business practices and leadership structure), individualized services and supports, employment services, community services, and additional accreditations for specific populations.
* There is no federal mandate for service providers be CARF accredited. The decision to require CARF accreditation is made at the state level. If a state opts not to require CARF accreditation, they can choose a similar accrediting entity as long it ensures compliance with high standards and effective service delivery.
* The California Code of Regulations, Title IX, section 7331 requires public and private nonprofit rehabilitation facilities that offer work-oriented programs and services to be CARF accredited except for facilities providing services primarily to the blind, deaf and/or independent living centers. In addition to being CARF accredited, DOR conducts their own certification of specific services based on standards set by the Department, a supplement to CARF. The regulation allows DOR to waive the CARF accreditation requirement for CRPs that have annual service expenditures at or below $50,000 for three prior, consecutive years.
* DOR’s policies on CARF accreditation are included in the Rehabilitation Administration Manual and the CRP Guide to Certification.
* DOR CRP Specialists partner with organizations to help them prepare for CARF accreditation.
* DOR currently works with 117 CRPs that are CARF accredited.
* The cost of CARF accreditation depends on the size of the CRP, the number of facilities, and the number of services provided. The largest component of the cost is the surveyor fees, which is $2,000/per day for each surveyor. The larger the CRP, the more surveyors that are needed, and estimated total costs can range from $9,000 - $30,000 plus the potential cost of an external financial audit.

SRC member questions and comments:

* Question about why agencies that primarily serve individuals who are blind or deaf are exempt. Many of these organizations would struggle to stay afloat and there are fewer organizations that provide these services.
* Brisbane spoke about Best Buddies International experience with CARF accreditation
* It was confirmed that CRPs have to recertify every three years.
* CARF reinforces safer services for the consumers by ensuring that organizations have the capacity and organizational services needed to provide effective and coordinated services in an accessible environment. CARF promotes a culture of continuous quality improvement.

Public comment: Bjerke read a public comment submitted by email on July 2, 2024 from Jan Johnson-Tyler, Founder and CEO of Evolibri, regarding concerns with the cost of CARF accreditation.

# Item 5: DOR Consumer Application Process

Bjerke provided a status update on the feedback/questions SRC members gave during the March 6 – 7, 2024 quarterly meeting regarding the DOR consumer application:

* SRC question: Can a field be added for applicants to list if they need additional reasonable accommodations (besides - or in addition to - ASL interpreting)? *Response - Yes, a field has been added in the online application “Do you have any other communication needs or need any other accommodations?”*
* SRC question: In alignment with the CalHHS language policy, Is the consumer application translated into the top five languages? *Response - Yes, all of the application forms and the consumer information handbook have been translated into the top five threshold languages (Spanish, Chinese, Tagalog, Vietnamese, Korean).*
* SRC question: Can (and should) clarification be within the application that individuals are not required to complete every field? *Response - DOR is working to move all required fields on the first page of the online application to the top of the webpage. Required fields on the second, third and forth pages will be moved up at a later date when DOR has a renewed contract with the department’s web developer. Based on the SRC’s feedback, all required fields throughout the application have been marked with an asterisk.*
* SRC question: Can DOR applicants log into a portal to track the status of their application? *Response: The DOR is considering this feature for possible implementation in the future.*
* SRC question: Many applicants may struggle to complete the application in one sitting. Is there is a funnel/automation that will send reminder via email or text to applicant that initiates but does not complete/submit the application? *Response - Regardless of how much info an individual enters into the online application, all applications are submitted to DOR’s AWARE case management system’s referral module. As long as some contact info is provided, like a phone number or email address, the individual will be contacted by DOR.*
* SRC question: The following Districts are asking Best Buddies to utilize the health questionnaire: San Francisco, Greater East Bay, Greater Los Angeles, and Los Angeles South Bay. *Response - The DOR Program Deputies have been informed and are communicating with their teams that the health questionnaire should no longer be utilized.*
* SRC question: I didn’t see a Cookie Policy on the site, which is required by the California Consumer Privacy Act (CCPA). Is one there and just hard to find? If so, suggest the link to the Cookie Policy be added to the global footer. If not, strongly recommend one be added asap. *Response - The cookie policy does not apply to DOR – only to for-profit organizations, entities, and companies.*
* SRC question: Alarm bells rang for me re the request for Medical Forms and the ability for applicants to upload medical forms. The second that any private medical information is requested (even if it is not required) means the website or at the very least the form submissions should be on a HIPAA platform and stored on a HIPAA server. Is this site HIPAA-compliant already? My strong suggestion is to not ask for any medical forms at all. And just ask the applicant to bring hard copies at the time of the in-person meeting and hand those to the counselor. That said, those forms also need to be stored in a HIPAA-compliant way on site. You may already be doing all of this, but it bears mentioning. *Response - The ability for individuals to upload medical forms via the online application has been removed, based on the SRC’s feedback.*
* SRC question: Regarding the “employment” portion of the online form, I didn’t see it in the demo, but it I saw it in text on the slide portion: the term "perspective employer” was used but the grammatical term should be “prospective employer” *Response - This has been corrected.*

Bjerke will provide an update at the August 8, 2024 SRC Policy Committee on the following questions:

* SRC question: Should the term “disability” be defined in the application instructions?
* SRC question: Should the term “conservator” be defined in the application instructions?
* SRC question: Should there be field in the application for individuals to list if a CRP or regional center referred them to DOR?

# Item 6: Future Policy Committee Agenda Items

* August 8th:
  + Additional discussion about CARF (focused on expenditure threshold) and the DOR application.
  + Maintenance support for DOR consumers – what short-term living expenses and supports can, and cannot, be provided.
* Self-employment will be addressed at a later meeting.

# Item 7: Adjourn

The meeting was adjourned at 11:45 am.