

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

The Home and Community-Based Services (HCBS) rules ensure that people with disabilities have full access to, and enjoy the benefits of, community living through long-term services and supports in the most integrated settings of their choosing. In order to assist in determining eligibility for compliance funding, providers must complete this evaluation. Both "Yes" and "No" answers require an explanation. A "No" response *could* mean a service setting is out of compliance with the HCBS rules and is potentially eligible for funding to make necessary adjustments. Once this evaluation is completed, it should act as a guide for filling out the provider compliance funding concept, which is required for any provider to be eligible for compliance funding. **Completion of this evaluation is for the sole purpose of applying for compliance funding and does not take the place of future provider assessments that the Department may require to determine provider compliance with the HCBS settings rules. Only providers requesting compliance funding need to complete this evaluation.**

Federal Requirements #1-5 apply to providers of all services, including residential and non-residential settings. Federal Requirements #6-10 are additional requirements that apply only to provider-owned or controlled residential settings.

The column labeled "Guidance" contains a series of questions intended to help identify compliance or non-compliance with each requirement as it relates to the HCBS rules. While responses to these questions can help in the determination of whether or not a particular requirement is met, these responses may not be the sole factor in this determination.

More information on the HCBS rules and this form can be found at www.dds.ca.gov/HCBS.

Questions may be directed to HCBSregs@dds.ca.gov.

Date(s) of Evaluation: October 21, 2019	Completed by: Karen Jones with input from VIP, Inc. Leadership Team
Vendor Name, Address, Contact: Vocational Improvement Program, Inc. (aka VIP, Inc.) Address 1: 9210 Rochester Ct., Rancho Cucamonga, CA 91730 Address 2: 1310 East Riverview Dr., San Bernardino, CA 92408 Address 3: 17292 Eucalyptus St., Hesperia, CA 92345 Contact: Karen Jones, Director of New Program and Staff Development karenj@vipsolutions.com or 909.483.5924	
Vendor Number: HJ0552-954 (Rancho Cucamonga); HJ0553-954 (Hesperia); HJ0554-954 (San Bernardino)	
Service Type and Code: Work Activity Program, 954	

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

Federal Requirement #1:

The setting is integrated in, and supports full access of individuals receiving Medicaid HCBS to the greater community, including opportunities to seek employment and work in competitive integrated settings, engage in community life, control personal resources, and receive services in the community, to the same degree of access as individuals not receiving Medicaid HCBS.

Guidance:

- Do individuals receive services in the community based on their needs, preferences and abilities?
- Does the individual participate in outings and activities in the community as part of his or her plan for services?
- If an individual wants to seek paid employment, does the home staff refer the individual to the appropriate community agency/resource?
- Do individuals have the option to control their personal resources, as appropriate?

Does the service and/or program meet this requirement? ☒ Yes ☒ No

Please explain: The primary purpose of this program is work and work is primarily performed in a non-integrated setting; however off-site and integrated services are offered through the following: trial community placements in supported employment (coverage as substitutes, temporary work, seasonal work, trial work experience, special work projects requested by employers, over-runs and overflow work, worksite tours.) These opportunities are based on desire, needs and preferences of clients. In addition, new transition services being offered include access to the community in both work-related and nonwork-related opportunities. This is not a home-based setting so bullets 3 and 4 do not apply; however, ongoing discussions about client rights includes informing the clients about their right to make choices about services and to control their own personal resources as appropriate.

Federal Requirement #2:

The setting is selected by the individual from among setting options, including non-disability-specific settings and an option for a private unit in a residential setting. The setting options are identified and documented in the person-centered service plan and are based on the individual's needs, preferences, and, for residential settings, resources available for room and board.

Guidance:

- Does the provider have a current regional center Individual Program Plan (IPP) on file for all individuals?
- Does each individuals' IPP document the different setting options that were considered prior to selecting this setting?

Does the service and/or program meet this requirement? ☒ Yes ☐ No

Please explain: The primary purpose of this program is work and work is primarily performed in a non-integrated setting; however off-site and integrated services are offered through the following: trial community placements in supported employment (coverage as substitutes, temporary work, seasonal work, trial work experience, special

Home and Community-Based Services (HCBS) Rules

CONCEPT FORM

work projects requested by employers, over-runs and overflow work, worksite tours.) These opportunities are based on desire, needs and preferences of clients. In addition, new transition services being offered include access to the community in both work-related and nonwork-related opportunities. This is not a home-based setting so bullets 3 and 4 do not apply; however, ongoing discussions about client rights includes informing the clients about their right to make choices about services and to control their own personal resources as appropriate.

Federal Requirement #3:

Ensures an individual's rights of privacy, dignity and respect, and freedom from coercion and restraint.

Guidance:

- Does the provider inform individuals, in a manner they can understand, of their rights to privacy, dignity, respect, and freedom from coercion and restraint?
- Does the provider communicate, both verbally and in writing, in a manner that ensures privacy and confidentiality?
- Do staff communicate with individuals based on their needs and preferences, including alternative methods of communication where needed (e.g., assistive technology, Braille, large font print, sign language, participants' language, etc.)?

Does the service and/or program meet this requirement? ☒ Yes ☐ No

Please explain: Rights are reviewed with clients on an ongoing basis, both at intake and at the client's semi-annual and annual meetings thereafter; in addition, rights are discussed with clients on an informal basis much more frequently than the minimum. Rights are posted in all facilities. Rights are used as a training time activity; rights are discussed in informal conversation. Privacy, dignity, respect and freedom from coercion and restraint are addressed in human rights policies and procedures as well as the organization's guiding principles; staff are trained and expected/held accountable to follow the guidelines put into place. Privacy and confidentiality is highly respected and upheld. Verbal conversations are held in private areas; written communication is safeguarded. Alternate methods of communication are used when needed.

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

Federal Requirement #4:

Optimizes but does not regiment individual initiative, autonomy, and independence in making life choices, including, but not limited to, daily activities, physical environment, and with whom to interact.

Guidance:

- Does the provider offer daily activities that are based on the individuals' needs and preferences?
- Does the provider structure their support so that the individual is able to interact with individuals they choose to interact with, both at home and in community settings?
- Does the provider structure their support so that the individual is able to participate in activities that interest them and correspond with their IPP goals?

Does the service and/or program meet this requirement? ☒ Yes ☒ No

Please explain: The primary purpose of this program is to work. Flexibility in schedule may be offered during training time (when work is not available) and clients may participate in activities that interest them and that correspond with their IHSP goals; production schedules will dictate activities during work time. Workers are offered rest breaks and meal periods when the clients have the right and availability to interact with whomever they choose. Program staff work closely with those interested in trial placements, substitute placements and temporary placements in the community and attempt to facilitate these opportunities whenever possible. New transition services (funded by the last rounds of HCBS funding grants) are in place to help facilitate the acquisition of new skills and the refinement of existing skills in preparation for possible placement in supported employment. These new services also help facilitate community access; however, the current service which has been primarily production until the new transition services (called ACE) were added doesn't allow for much individual choice in their program day.

Federal Requirement #5:

Facilitates individual choice regarding services and supports, and who provides them.

Guidance:

- Does the provider support individuals in choosing which staff provide their care to the extent that alternative staff are available?
- Do individuals have opportunities to modify their services and/or voice their concerns outside of the scheduled review of services?

Does the service and/or program meet this requirement? ☒ Yes ☐ No

Please explain: Client choice is highly respected. Alternate staff are available and clients may and do voice concerns over staffing assignments and changes are made when possible. A grievance procedure is reviewed with clients and is contained in the client

**Home and Community-Based Services (HCBS) Rules
CONCEPT FORM**

handbook; however, clients may voice concerns at any time (whether using the formal grievance procedure or not) and the concerns are actively and promptly addressed. Clients are encouraged to provide ongoing feedback through surveys and informal discussion; clients are encouraged to ask questions and seek clarification on any matters of importance to them at any time, and these are responded to in a respectful and timely manner. Program modification is provided on an individualized basis.

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

Only providers of services in **provider-owned or controlled residential settings** need to complete the remainder of this evaluation. In **provider-owned or controlled residential settings**, in addition to the above requirements, the following requirements must also be met:

Federal Requirement #6:

The unit or dwelling is a specific physical place that can be owned, rented or occupied under a legally enforceable agreement by the individual receiving services, and the individual has, at a minimum, the same responsibilities and protections from eviction that tenants have under the landlord/tenant law of the State, county, city or other designated entity. For settings in which landlord/tenant laws do not apply, the State must ensure that a lease, residency agreement or other form of written agreement will be in place for each participant and that the document provides protections that address eviction processes and appeals comparable to those provided under the jurisdiction's landlord tenant law.

Guidance:

- As applicable, does each individual have a lease, residency agreement, admission agreement, or other form of written residency agreement?
- Are individuals informed about how to relocate and request new housing?

Does the service and/or program meet this requirement? ☐ Yes ☐ No

Please explain: NA – not a residential program

Federal Requirement #7:

*Each individual has privacy in his/her sleeping or living unit:
Units have entrance doors lockable by the individual, with only appropriate staff having keys to doors as needed.
Individuals sharing units have a choice of roommates in that setting.
Individuals have the freedom to furnish and decorate their sleeping or living units within the lease or other agreement.*

Guidance:

- Do individuals have a choice regarding roommates or private accommodations?
- Do individuals have the option of furnishing and decorating their sleeping or living units with their own personal items, in a manner that is based on their preferences?
- Do individuals have the ability to lock their bedroom doors when they choose?

Does the service and/or program meet this requirement? ☐ Yes ☐ No

Please explain: NA – not a residential program

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

<p><u>Federal Requirement #8:</u> <i>Individuals have the freedom and support to control their own schedules and activities, and have access to food at any time.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Do individuals have access to food at any time? • Does the home allow individuals to set their own daily schedules? • Do individuals have full access to typical facilities in a home such as a kitchen, dining area, laundry, and comfortable seating in shared areas?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No Please explain: NA – not a residential program</p>	
<p><u>Federal Requirement #9:</u> <i>Individuals are able to have visitors of their choosing at any time.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Are visitors welcome to visit the home at any time? • Can individuals go with visitors outside the home; such as for a meal or shopping, or for a longer visit outside the home, such as for holidays or weekends?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No Please explain: NA – not a residential program</p>	
<p><u>Federal Requirement #10:</u> <i>The setting is physically accessible to the individual.</i></p>	<p><u>Guidance:</u></p> <ul style="list-style-type: none"> • Do individuals have the freedom to move about inside and outside the home or are they primarily restricted to one room or area? • Are grab bars, seats in bathrooms, ramps for wheelchairs, etc., available so that individuals who need those supports can move about the setting as they choose? • Are appliances and furniture accessible to every individual?
<p>Does the service and/or program meet this requirement? <input type="checkbox"/> Yes <input type="checkbox"/> No Please explain: NA – not a residential program</p>	

**Home and Community-Based Services (HCBS) Rules
CONCEPT FORM****CONTACT INFORMATION**

Contact Name: Karen Jones
Contact Phone Number: 909-483-5924
Email Address: karenj@vipsolutions.com

ACKNOWLEDGEMENT

By checking the box below, I acknowledge that completion of this evaluation is for the sole purpose of applying for compliance funding and does not take the place of future provider assessments that the Department may require to determine provider compliance with the HCBS settings rules.

☒ I AGREE

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

Existing regional center vendors may receive funding to make changes to service settings and/or programs to help them come into compliance with the HCBS rules. To be considered for funding, vendors must complete and submit this form and the provider compliance evaluation form as one packet to the regional center with which it has primary vendorization.

Instructions:

- The concept form on the next page must be used, may not exceed four pages plus the budget worksheet and any cost back up, and must be kept in Arial 12-point font. Submit the form in Microsoft Word or PDF format. An extra half page is permitted to answer questions about prior funding, but the rest of the concept must be within the standard page requirements.
- There has been a significant change in the form and process compared to prior years. **In order to receive funding, this 2019-20 form must be used.**
- For providers that operate programs with several vendor numbers involved in one concept, one evaluation and concept form should be submitted and should list all vendor numbers for related/included programs. If multiple programs owned by the same parent company have different compliance evaluations or concepts, additional applications can be submitted but should be attached in the same document as the other owned programs so they can be reviewed together.
- The results of the evaluation should be clearly laid out in the section referring to identification of federal requirements that are currently out of compliance, which the concept will address.
- The concept form includes detailed information that describes the funding requests and supports how the requests will assist the provider to come into compliance.
- There should be a clear link between what is being requested and the federal requirement currently out of compliance.
- Concepts should demonstrate how the requested change in service delivery will impact individuals in offering more choices or opportunities in the community.

Strengths of previously funded concepts:

- Identified the need as well as proposed a plan to provide outreach and information regarding the HCBS rules to individuals served and members of their support teams.
- Discussed the need for additional funds in order to effectively support individuals served on a more individualized basis in overcoming barriers to community integration and employment, as appropriate.
- Prioritized the preferences of individuals served and utilized their feedback in the development of the concept.
- Implemented train-the-trainer certification for person-centered planning/thinking and training regarding the HCBS rules.
- Enabled residents to age in place and exercise more choice and independence.

More information on the HCBS rules and this form can be found at www.dds.ca.gov/HCBS.

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

Vendor name	Vocational Improvement Program, Inc. (VIP, Inc.)
Vendor number(s)	HJ0552-954; HJ0553-954; HJ0554-954
Primary regional center	Inland Regional Center
Service type(s)	Work Activity Program (WAP)
Service code(s)	954
Number of consumers currently served	HJ0552-954=159 (Rancho Cucamonga); HJ0553-954=116 (Hesperia); HJ0554-954=136 (San Bernardino)
Current staff to consumer ratio	There is no required ratio for a work activity program
<p>1. Please provide a brief description of the service/setting that includes what a typical day consists of and how services are currently provided. This response must include the baseline/current levels for any aspects of the program for which the concept proposes funding.</p> <p>A work activity program (WAP) has a daily production focus (typically assembly and packaging in nature) in a production facility that is owned/leased by the vendored organization. The structure of a WAP is site-based and does not allow for any staff position(s) for sustained integration opportunities, nor position(s) to implement a true person-centered approach. If a person desires to explore CIE, it does not allow for job development, discovery, traditional job placement, or customized employment.</p>	
Project Narrative Description:	
<p>2. Please provide a brief summary narrative of the concept for which you are requesting funding, including justification for the funding.</p> <p>To take a person-centered approach for clients wishing to explore CIE, funding for two staff positions called employment specialists is critically needed. These staff will focus on job development, discovery, traditional job placement, or customized employment in order to aid individuals that are choosing to transition to community-based employment.</p>	
<p>3. Identify which HCBS federal requirements this concept addresses that are currently out of compliance. Could be all or a subset of those identified as out of compliance on the evaluation.</p> <p>1 <u>x</u> 2 <u> </u> 3 <u> </u> 4 <u>x</u> 5 <u> </u> 6 <u> </u> 7 <u> </u> 8 <u> </u> 9 <u> </u> 10 <u> </u></p>	
<p>#1: WAP is considered congregate/non-integrated; #4: The structure of WAP does not optimize individual initiative, autonomy and independence.</p>	
<p>4. For each HCBS out-of-compliance federal requirement that is being addressed by this concept, describe the barriers to compliance and why this concept is necessary. If this information is in the evaluation section, please copy it here.</p>	
<p>#1: VIP's work activity programs are chosen by many clients; however, an HCBS barrier is that WAPs provide work in settings considered congregate and non-integrated with limited access to the community. Transitioning a nonintegrated WAP model of services</p>	

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

is likely going to be one of the most challenging transitions to be faced in meeting the HCBS requirements. The current WAP structure does not allow for sustained integration opportunities or individualized training needed for successful transition to competitive employment as currently defined; #2: An HCBS barrier results from the structure of WAP, which is rigid and limits daily activities and physical environment, not allowing for clients to optimize individual initiative, autonomy and independence.

5. For each out-of-compliance federal requirement that is addressed in this concept, please explain how the concept will bring the vendor into compliance.

A. Barriers and Resulting Needs:

1. For those persons served that are interested in moving from the WAP model to community-based employment, including CIE (Competitive Integrated Employment), additional supports are needed.
2. While some persons served are able to find a job on their own, most that desire to enter community-based employment are in need of comprehensive job development support through working with an employment specialist.
3. Current funding does not cover the cost of the tasks of an employment specialist who will perform services such as discovery, job preparation for interviews, resume development, support for application completion and the actual job search/placement itself.
4. VIP, Inc. currently employs one unfunded employment specialist; additional employment specialists are needed.
 - a. The current unfunded employment specialist had a caseload (largely outside referrals) of 36 at any given time. This high caseload results in longer than desired outcomes; in addition, there is little-to-no room for growth due to caseload capacity.
 - b. VIP specifically needs one employment specialist in the high desert area of Hesperia/Victorville, Apple Valley, and one in the Inland Empire (these positions would be in addition to the 1 unfunded Employment Specialist currently on staff at VIP.)
 - c. With the addition of 2 funded employment specialists, VIP can begin promoting CIE in our San Bernardino WAP location and may allow us to expand and seek SE vendorization, something that has never been formally offered in this program location.

B. How these barriers will be addressed for compliance:

To increase options and access to community-based employment, including CIE: Additional employment specialists will be hired to perform tasks such as but not limited to:

1. Discovery
2. Job Preparation
3. Interview skills/Resume Development
4. Development of Traditional CIE and Customized Employment job sites
5. Support for Application Completion
6. Performing the actual job search, placement and support for retention
7. Other needed services for success of persons served

C. Method to implement:

To complete this, VIP will hire 2 employment specialists whose key focus will be the transition of persons served from WAP to Community-based Employment. One will be based in the High Desert area of Hesperia/Victorville/Apple Valley, and the other will be based in the greater Inland Empire. The toolkit used will include traditional placement methods as well as other models such as discovery and customized employment.

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

6. What are the proposed outcomes and objectives of the concept, and what are the methods of achieving and tracking them?

Outcomes: Specific and measurable outcomes will be included in VIP's annual outcomes reporting tool. Measurements may include but are not limited to data such as length of time in Job Development; number of placements; average hours worked; average wage; benefits; employment retention; others defined by VIP's leadership and industry standards.

7. Please describe how and/or what was done to include input from the individuals served in developing this concept? Discuss not only the development of the concept, but also what steps were taken to identify the interests and desires of the individuals and who was involved in that process.

Feedback was gathered, not only about the currently funded transition services now being provided through funding from the FY18/19 grant cycle and previously funded FY16/17 grant cycle (ACE – Achieving Competitive Employment), but also about how they would like to see these services expanded and/or new services added. Solicited client/family feedback included comments indicating they would like to learn more about job development and placement, specific jobs (trade training), trial job placements, resume writing, interviewing, computer class. The person-centered process implemented as part of ACE also provided feedback about the desire on many clients' part to begin the job search process. All expanded/new services will be individualized and go through the person-centered planning process.

8. Please describe how the concept you propose will enable you to provide more person-centered services to your clients.

The very nature of supported employment is more individualized and person-centered than WAP. Job development is a one-to-one service and keeps the individual at the center of the planning. Information gleaned from person-centered thinking meetings currently being conducted by VIP's ACE team will be relied on for successful potential transitions from WAP (congregated/nonintegrated) to SE (community-based/integrated)

9. Please address your plan for maintaining the benefits, value, and success of your project at the conclusion of 2019-20 HCBS Funding.

VIP's core values and guiding principles state that every individual has the right to work toward achieving a quality of life, whether living with a disability or not, that leads to self-fulfillment and meaning. This may include exposure to opportunities, freedom to make individual choices, participation and inclusion in the community, and a life that is self-directed. The benefits, value and success of this project will far outlive conclusion of the funding through offering individuals the dignity of work that he/she chooses and owns.

10. Write a brief narrative below explaining each major cost category and timeline. Complete the budget template at the end of the concept sheet. An excel version with formulas is available. When applicable, budgets should include personnel/benefits, operating costs such as consultants or training, administrative expenses/indirect costs, and capital costs (assets lasting more than 2 years). If project spans 2 years or occurs in phases, budget should be separated by phase/year.

Administrative costs, if any, must comply with DDS' vendor requirements, including a cap of 15% of the sum of personnel/benefits, consulting, and operating costs (must exclude capital

Home and Community-Based Services (HCBS) Rules CONCEPT FORM

costs). http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4629.7&awCode=WIC

Major costs (2-year project): salary package for two Employment Specialist positions; vehicles; mobile operating tools. Methodology for calculation of administration costs is program occupancy square footage in relation to overall organizational square footage.

11. Please address sustainability of funding sources for all programs or concepts requiring any funding past the time frame of the requested grant, especially those that involve staff or other long-term costs. Please mark "not applicable" if costs will all be incurred during the program time frame.

The potential increase in placements will help sustain the revenue stream necessary to support the ongoing nature of the employment specialist positions. VIP may also seek additional vendorization in discovery/customized employment.

12. Have you or the organization you work with been a past recipient of DDS funding? If yes, what fiscal year(s)?

HCBS Funding ☐ No ☒ Yes. If Yes, FY(s) 16/17; 18/19
Disparity Funding ☒ No ☐ Yes. If Yes, FY(s) _____
CPP Funding ☒ No ☐ Yes. If Yes FY(s) _____

If yes to any question be sure to answer questions 13 and 14.

For providers who have received prior HCBS, Disparity or CPP Funding from DDS

13. If your organization has received prior funding from any of the above sources, please provide an update on the prior funding project. You may copy and paste from progress update(s) previously provided to regional centers or DDS.

For FY16/17 (contract August 2016-June 2018): 240 clients participated in Job Readiness Training; 73 person-centered thinking meetings were held; 4 educational community nights were held for family members/clients; Annual staff training was completed for all staff on person-centered thinking, advocacy, rights and choice; the A-TEAM, a national client advocacy group was established (first chapter in CA) at all 3 WAP locations; Market research was completed for potential employment markets; employer outreach took place, including multiple employers taking advantage of diversity/sensitivity training; multiple opportunities for clients to participate in community-based employment opportunities (job trails, substitute positions, temporary positions, etc.) and non-work community based activities; all grant goals met or exceeded.

For FY18/19 (contract July 2019-December 2020): this contract just completed its first quarter with initial milestones met. This contract closely mirrors the services provided in FY16/17 and adds a discovery process and a second level job readiness class.

14. If your organization received prior funding, please explain how the current funding request is not redundant with any prior funding received and/or builds on the prior funding but was not part of the original funding.

The current funding request is not redundant with prior funding. Previous funding awards focused on job readiness, training, education, community access, and outreach. The project contained in this concept form changes the focus from preparation to actual job development and job placement.

HCBS CONCEPT BUDGET							
Vendor Name		Vocational Improvement Program, Inc.					
Vendor Number(s)		HJ0552-954; HJ0553-954; HJ0554-954					
	Salary and Benefits	Year 1 Budget		Year 2 Budget		Total	
		FTE	Annual Cost	FTE	Annual Cost	Cost	
Personnel (salary + benefits)							
Employment Specialist	75000	1.00	\$ 75,000	1.00	\$ 75,000	\$ 150,000	
Employment Specialist	75000	1.00	\$ 75,000	1.00	\$ 75,000	\$ 150,000	
			\$ -		\$ -	\$ -	
			\$ -		\$ -	\$ -	
			\$ -		\$ -	\$ -	
			\$ -		\$ -	\$ -	
			\$ -		\$ -	\$ -	
			\$ -		\$ -	\$ -	
			\$ -		\$ -	\$ -	
Personnel Subtotal			\$ 150,000		\$ 150,000	\$ 300,000	
Operating expenses							
Fuel			\$ 5,000		\$ 5,000	\$ 10,000	
Vehicle Insurance			\$ 7,200		\$ 7,200	\$ 14,400	
Cell Phone			\$ 1,200		\$ 1,200	\$ 2,400	
			\$ -		\$ -	\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Operating Subtotal			\$ 13,400		\$ 13,400	\$ 26,800	
Administrative Expenses							
General Liability Insurance			\$ 4,162		\$ 4,162	\$ 8,324	
Occupancy (based on square footage)			\$ 17,468		\$ 17,468	\$ 34,937	
			\$ -		\$ -	\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Administrative Subtotal			\$ 21,630		\$ 21,630	\$ 43,261	
Capital expenses							
Vehicle			\$ 24,000			\$ 24,000	
Vehicle			\$ 24,000			\$ 24,000	
Laptop			\$ 1,200			\$ 1,200	
Laptop			\$ 1,200			\$ 1,200	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
						\$ -	
Capital Subtotal			\$ 50,400		\$ -	\$ 50,400	
Total Concept Cost			\$ 235,430		\$ 185,030	\$ 420,461	

See Attachment F for budget details and restrictions