

## 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](http://www.dds.ca.gov/HCBS).

Questions may be directed to [HCBSregs@dds.ca.gov](mailto:HCBSregs@dds.ca.gov).

Date(s) of Evaluation: 12/2018 and 11/2019	Completed by: Lea Ronald
Vendor Name, Address, Contact: Napa Valley PSI, PO Box 600, Napa CA 94559, Lea Ronald (707) 255-0177	
Vendor Number: HN0176	
Service Type and Code: Work Activity Program-954	

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### **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: Napa Valley PSI's Work Activity Program provides onsite work training through a 1:15 staff to participant ratio. The program currently serves 40 people and by design limits their ability to receive services in the community. For nearly a decade, the organization has committed additional resources to augment staffing in order to create opportunities for persons served to participate in community-based work crews. In 2015, Napa Valley PSI further initiated efforts to transition from site to community-based services and developed a Community Integration Training component. This program, called *Integrated Services*, focuses on readying individuals for competitive integrated employment through discovery, volunteerism and community inclusion. It also bridges the gap between site based vocational training and supported employment. Napa Valley PSI has successfully transitioned 22% of program participants from site to community-based services but 78% of the program remains out of compliance with this requirement. 60% of participants continue to spend 100% of their day at the site-based work program. These individuals (and frequently their family members) express the desire to maintain placement in the workshop and are fearful of change. While some participate in the community-based work crews, the work is limited to litter abatement and janitorial and is not customized to the individual. Napa Valley PSI encourages individuals at annual meetings and throughout the year to participate in "trial days" with the *Integrated Services* program. Progress is slow, and efforts have been made to partner with North Bay Regional Center to assist in the transition on an individualized basis.

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<p><b><u>Federal Requirement #2:</u></b> <i>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.</i></p>	<p><b><u>Guidance:</u></b></p> <ul style="list-style-type: none"> <li>• Does the provider have a current regional center Individual Program Plan (IPP) on file for all individuals?</li> <li>• Does each individuals' IPP document the different setting options that were considered prior to selecting this setting?</li> </ul>
<p><b>Does the service and/or program meet this requirement? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</b></p> <p>Please explain: Napa Valley PSI has procedures in place which require a current IPP as part of the files for persons served. Staff review files for completeness as part of the semiannual and annual process and will follow up with North Bay Regional Center Service Coordinators to obtain current IPP's when they expire. It is believed that compliance in this area is enhanced by conversation at IHC meetings regarding interest in the <i>Integrated Services</i> model. It has also been enhanced through implementation of person-centered planning processes which guide both the persons service plan (IHC) but also enriches the broader planning (IPP) for an individual's life</p>	
<p><b><u>Federal Requirement #3:</u></b> <i>Ensures an individual's rights of privacy, dignity and respect, and freedom from coercion and restraint.</i></p>	<p><b><u>Guidance:</u></b></p> <ul style="list-style-type: none"> <li>• Does the provider inform individuals, in a manner they can understand, of their rights to privacy, dignity, respect, and freedom from coercion and restraint?</li> <li>• Does the provider communicate, both verbally and in writing, in a manner that ensures privacy and confidentiality?</li> <li>• 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.)?</li> </ul>
<p><b>Does the service and/or program meet this requirement? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</b></p> <p>Please explain: Individual participants, family members, and if required their legal representatives are informed about Napa Valley PSI policies outlining individual participant rights. These materials are available in Spanish and picture format and communicated as part of intake and annually thereafter. Participant rights are also a topic of curriculum covered during non-work activities. In addition, staff receive training</p>	

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that emphasizes participant rights and how to support individuals as part of their service plan. Napa Valley PSI maintains a Code of Ethics and Corporate Compliance Policy and reviews the contents with board and staff annually. Program participants receive support using alternative methods of communication as identified in their program/service plan although training for staff in this area would enhance compliance.

### **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: Napa Valley PSI offers participant choice in regard to work, friends, and activities but options are limited due to the fact that services are primarily site based. This means the type of work that is available doesn't always meet individual career interests and the segregated setting limits access to having friends outside of the program (with or without disabilities) and exploring a wider range of social and recreational options. Some individuals choose to spend their time in community-based work crews and/or participate in the *Integrated Services* program, but many are reluctant to leave the comfort of the workshop setting. Napa Valley PSI attempts to educate individuals and families about options beyond site-based services in an effort to enhance choices for persons served.

### **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: Individuals served by Napa Valley PSI can express choice regarding staff they want to work with. Participants also have continuous opportunity to voice concerns or express wishes to modify their services. Aside from formal complaint

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procedures, by policy and protocol persons served have access to management, who will make time to listen, answer questions and act on expressed concerns. Individual participants are also supported to contact their North Bay Regional Center Service Coordinator to express grievances or modifications in programming. ID team meetings to address participant concerns and wishes are also supported and facilitated. Often it is staff or management who may recognize the need for and advocate problem solving concerns or service modification for those unable to verbalize or express their needs fully.

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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:

<p><b><u>Federal Requirement #6:</u></b> <i>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.</i></p>	<p><b><u>Guidance:</u></b></p> <ul style="list-style-type: none"> <li>• As applicable, does each individual have a lease, residency agreement, admission agreement, or other form of written residency agreement?</li> <li>• Are individuals informed about how to relocate and request new housing?</li> </ul>
<p><b>Does the service and/or program meet this requirement?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No Please explain:</p>	
<p><b><u>Federal Requirement #7:</u></b> <i>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.</i></p>	<p><b><u>Guidance:</u></b></p> <ul style="list-style-type: none"> <li>• Do individuals have a choice regarding roommates or private accommodations?</li> <li>• 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?</li> <li>• Do individuals have the ability to lock their bedroom doors when they choose?</li> </ul>
<p><b>Does the service and/or program meet this requirement?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No Please explain:</p>	

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<p><b><u>Federal Requirement #8:</u></b> <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><b><u>Guidance:</u></b></p> <ul style="list-style-type: none"> <li>• Do individuals have access to food at any time?</li> <li>• Does the home allow individuals to set their own daily schedules?</li> <li>• Do individuals have full access to typical facilities in a home such as a kitchen, dining area, laundry, and comfortable seating in shared areas?</li> </ul>
<p><b>Does the service and/or program meet this requirement?</b> <input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> Please explain:</p>	
<p><b><u>Federal Requirement #9:</u></b> <i>Individuals are able to have visitors of their choosing at any time.</i></p>	<p><b><u>Guidance:</u></b></p> <ul style="list-style-type: none"> <li>• Are visitors welcome to visit the home at any time?</li> <li>• 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?</li> </ul>
<p><b>Does the service and/or program meet this requirement?</b> <input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> Please explain:</p>	
<p><b><u>Federal Requirement #10:</u></b> <i>The setting is physically accessible to the individual.</i></p>	<p><b><u>Guidance:</u></b></p> <ul style="list-style-type: none"> <li>• Do individuals have the freedom to move about inside and outside the home or are they primarily restricted to one room or area?</li> <li>• 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?</li> <li>• Are appliances and furniture accessible to every individual?</li> </ul>
<p><b>Does the service and/or program meet this requirement?</b> <input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> Please explain:</p>	

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**CONTACT INFORMATION**

Contact Name: Lea Ronald  
Contact Phone Number: (707) 255-0177  
Email Address: lea@napavalleypsi.org

**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



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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](http://www.dds.ca.gov/HCBS).

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Vendor name	Napa Valley PSI
Vendor number(s)	HN0176
Primary regional center	North Bay Regional Center
Service type(s)	Work Activity Program
Service code(s)	954
Number of consumers currently served	40
Current staff to consumer ratio	Current staff to client ratio is 1:10 although program design requires 1:15
<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>Participants of Napa Valley PSI's Work Activity Program choose from site-based assembly and packaging work, a few community based litter abatement and janitorial crews and mostly site based educational and recreational options. By design, the program limits the ability to receive services in the community, learn bus riding skills, participate in a wide range of activities and make friends with people who are not paid staff or program participants. As a result of the 2018/2019 HCBS grant cycle, two new staff positions were created to address barriers to community participation. These positions were designed to work with individuals and their families, using person centered planning processes, to explore community-based options and address fears related to leaving a work shop setting. The goal is for these same individuals to eventually transition to the 100% community-based <i>Integrated Services</i> day program, but the transition has proven to need to be slow and individualized. The 100% community-based day program requires that persons served are able to get to and from home independently and the bulk ride public transportation. Upon intake, participants of the <i>Integrated Services</i> program receive mobility training until such time as they demonstrate the competency to ride public transportation independently.</p>	
<p><b>Project Narrative Description:</b></p>	
<p>2. Please provide a brief summary narrative of the concept for which you are requesting funding, including justification for the funding.</p>	
<p>Napa Valley PSI is requesting funding to purchase a 7 passenger minivan. The fact that the organization has been primarily site-based means there has been little investment in vehicles and the organization currently has 2 large capacity vans that are nearly 20 years old with well over 100k miles. A new minivan will provide the staff with the means to take individuals out into the community on a daily basis without competing with vehicles needed to transport work crews. A minivan, with capacity to carry more people than a regular passenger vehicle, meets the request of a greater number of</p>	

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participants who express interest in community involvement. The minivan was also chosen as it is more accessible for people with mobility challenges. This minivan will break down barriers to getting people out in the community during the transition from the Work Activity Program to the *Integrated Services* program. It should be noted that once these individuals are fully transitioned into the 100% community-based *Integrated Services* day program, they will be trained in public transportation.

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.

1  2  3  4  5  6  7  8  9  10

This concept addresses requirements #1 and #4.

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.

**The primary barrier to compliance with Federal Requirement #1 and #4** relates to the fact that the Work Activity Program is a site-based model with high participant to staff ratios which make community access a challenge. Napa Valley PSI has made significant efforts to shift its services to a community-based model, but families and individuals express concern and are sometimes reluctant to make this change. Napa Valley PSI encourages individuals at IHC meetings and throughout the year to participate in “trial days” with the *Integrated Services* program but many do not choose this option. The organization intends to use augmented staffing to shape persons served to spend greater amounts of time in community-based settings. It is believed that this will alleviate fears and increase the ability of participants to make informed choices about service options. Having access to a minivan will help the organization achieve this goal and address some of the barriers that have arisen already in the early stages of implementing the 2018/2019 HCBS grant. These include challenges with transportation infrastructure that is limited to dropping individuals off at program sites and is not flexible to drop them at community-based locations. This means individuals attempting to explore the new program, yet not trained in public transportation are forced to come to PSI and then go out into the community. The other barrier is access to a vehicle on a regular basis as outdated vehicles are breaking down and/or needed to provide transportation to work sites.

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.

**PSI will increase compliance with Federal Requirement #1 and #4** by having access to a vehicle that is available to take people out into the community on a daily basis for exploration purposes and to assist with transition to the community-based day program. It is believed that the opportunity to explore community activities, discover new interests and meet new people in a manner that feels safe and breaks down individualized barriers will increase participant choices and provide a greater range of service options. It is also believed that this will ease the transition to the community-based program.

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

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### Increased opportunities to make informed decisions and explore options for participation in community activities of choice

Measured through the following:

- Increase in total number of hours persons served spend volunteering in the community
- Increase in total number of hours persons served spend working in the community
- Increase in total number of hours persons served spend in the community

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.

Napa Valley PSI's management team gathered input from program participants, family members/residential service providers, and NBRC about service needs and used data from annual surveys and formal/informal conversations to develop this proposal.

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

Napa Valley PSI will utilize a person-centered planning process as the basis for determining how to assist each person to explore community-based options. The intent is for individuals to make informed choices about preferences and discover new options.

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

Napa Valley PSI has committed significant resources to transitioning services to be compliant with HCBS requirements. The organization recognizes the need to change its service model to one that is community based and has demonstrated success over the past 4 years in moving 22% of program participants to a 100% community-based model. The long-term plan for Napa Valley PSI is to shift services to a community-based model but many of the participants have been with the organization many years and deserve the opportunity to transition in a manner that feels safe and builds success.

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 costs).

[http://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?sectionNum=4629.7&lawCode=WIC](http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4629.7&lawCode=WIC)

### **2020 Ford Transit Connect XL Passenger Van Total \$30,000**

Timeline: Purchase by 9/30/2020

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

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long-term costs. Please mark "not applicable" if costs will all be incurred during the program time frame.

Not applicable

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 X Yes. If Yes, FY(s) 2016/2017 & 2018/2019

Disparity Funding X No \_\_\_ Yes. If Yes, FY(s) \_\_\_\_\_

CPP Funding X 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.

### As a result of 2016/2017 and 2018/2019 funding, Napa Valley PSI has the following in place:

- A new logo, mission statement and website which rebrands the organization as providing services that are community versus site based.
- One person served continues to be a regular member of the Kiwanis Club of Napa (versus the segregated *Aktion Club*). He is a welcomed and valued member of the group.
- Staff have received 300+ hours of training in key areas including person centered planning, self-advocacy, teaching skills, discovery/assessment processes, and job development techniques
- A peer to peer advocacy group was formed and continues to be active.
- Three individuals served in the *Integrated Services* program have paid internships that were identified as part of a person-centered planning and discovery process.
- 2 staff positions were developed that are dedicated to working with site-based program participants through a person-centered planning process to explore community options.
- Over 50% of participants have completed a person-centered planning process.
- The presence of a tracking system that brings visibility to key outcomes and is shared with participants, staff and board on a quarterly basis. Below are the results thus far in 2019.

Measure	Q1	Q2	Q3	Q4
Number of individuals served (as of the last day of the quarter)	45	45	48	
Total hours persons served spend in the community.	2,117	2,605	2,354	
Total hours persons served spend volunteering in the community.	379	389	417	
Total hours persons served spend working in the community.	410	586	744	
% of staff trained in Person Centered Planning (2-day course).	22%	22%	22%	

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.

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Napa Valley PSI is requesting to purchase a minivan which was never part of any other grant request and will be used to build on past efforts from prior funding without redundancy.

HCBS CONCEPT BUDGET	30,000					
Vendor Name	Napa Valley Psi					
Vendor Number(s)	HN0176					
	Salary and Benefits	Year 1 Budget		Year 2 Budget		Total
		FTE	Annual Cost	FTE	Annual Cost	Cost
<b>Personnel (salary + benefits)</b>						
Position Description			\$ -		\$ -	\$ -
Position Description			\$ -		\$ -	\$ -
Position Description			\$ -		\$ -	\$ -
Position Description			\$ -		\$ -	\$ -
Position Description			\$ -		\$ -	\$ -
Position Description			\$ -		\$ -	\$ -
Position Description			\$ -		\$ -	\$ -
Position Description			\$ -		\$ -	\$ -
Position Description			\$ -		\$ -	\$ -
Personnel Subtotal			\$ -		\$ -	\$ -
<b>Operating expenses</b>						
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
Operating Subtotal			\$ -		\$ -	\$ -
<b>Administrative Expenses</b>						
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
Administrative Subtotal			\$ -		\$ -	\$ -
<b>Capital expenses</b>						
2020 Transit Passenger Van			\$ 30,000			\$ 30,000
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
						\$ -
Capital Subtotal			\$ 30,000		\$ -	\$ 30,000
Total Concept Cost			\$ 30,000		\$ -	\$ 30,000

See Attachment F for budget details and restrictions