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: 11/22/2019	Completed by: Darian Bennett, Development Manager				
Vendor Name, Address, Contact: Partnerships With Industry 7540 Metropolitan Drive Suite 105 San Diego, CA 92108					
Vendor Number: HQ0395, HQ0397, HQ0399, HQ0427, HQ0429, HQ0428, HQ0426, HQ0396, HQ0398, HQ0402, HQ0400, HQ1355					
Service Type and Code: Three (3) Work Activity Programs (WAP 954), One Adult Development Program (ADP 510), Four (4) Supported Employment (SE/IP 950), and Four (4) Supported Employment (SE/GS 952)					

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: Partnerships With Industry meets all of the Federal Requirements with exception of requirement #1. The persons served by PWI's WAP currently work in a congregate work setting which limits their access to the community. These individuals are informed of their options; however, the nature of the program limits their access to these options. The facilities are open to the public; however, community access is limited for security reasons. Other persons served in programs such as ADP, SE/IP, and SE/GS have not had the opportunity to work one-on-one with PWI staff to evaluate their needs, preferences, and abilities beyond the extent of their IPP.

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: Individuals are able to select their setting options as outlined by their IPP and each individual works alongside San Diego Regional Center counselors to choose their setting options. PWI requires all IPPs for persons served to be on file in each office.

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: PWI ensures the rights of privacy, dignity and respect, and freedom from coercion and restraint at all times. PWI staff are forbidden from engaging in coercion, restraint, or any other violations of personal safety or privacy. All support staff receive mandatory training on the rights of individuals with disabilities and communicate with clients both orally and in written documentation during their intake, semi-annual and annual meetings about PWI's confidentiality policy, and rights to privacy. PWI supplies alternate methods of communication when needed for expressing the ways PWI ensures each individual's rights of privacy, dignity and respect.

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: PWI optimizes but does not regiment individuals initiative, autonomy, and

independence in making life choices, including, but not limited to, daily activities, physical environment, and with whom to interact.

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: PWI facilitates individual choice regarding services and supports, and who provides them through semi-annual and annual meetings with clients and their Interdisciplinary Team to discuss options for their services such as transfers, promotions, modifications to support, etc.

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:		

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:	

Federal Requirement #8: Individuals have the freedom and support to control their own schedules and activities, and have access to food at any time.	 Guidance: 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?
Does the service and/or program meet this Please explain:	s requirement? □ Yes □ No
Federal Requirement #9: Individuals are able to have visitors of their choosing at any time.	 Guidance: 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?
Does the service and/or program meet this Please explain:	s requirement? □ Yes □ No
Federal Requirement #10: The setting is physically accessible to the individual.	 Guidance: 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?
Does the service and/or program meet this Please explain:	requirement? □ Yes □ No

CONTACT INFORMATION

Contact Name: Darian Bennett

Contact Phone Number: (619) 354-6156

Email Address: dbennett@pwiworks.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

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

Vendor name Partnerships With Industry
--

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.

Vendor number(s)	HQ0395, HQ0397, HQ0399, HQ0427, HQ0429, HQ0428, HQ0426, HQ0396, HQ0398, HQ0402, HQ0400, HQ1355				
Primary regional center	San Diego Regional Center				
Service type(s)	 Three (3) Work Activity Programs (WAP) One Adult Development Program Four (4) Supported Employment (SE/IP) Four (4) Supported Employment (SE/GS) 				
Service code(s)	954, 510, 950, 952				
Number of consumers currently served	401 Consumers				
Current staff to consumer ratio	12:1 (WAP), 3:1 (ADP), 1:1 (SE/IP), 4:1 (SE/GS)				

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.

Individuals employed at PWI facilities who receive Medicaid HCB Services currently work in a congregate work setting alongside other individuals with disabilities completing paid production projects from contracted PWI partners with the support of staff on their paid tasks and on other non-paid career training activities. Individuals who have transitioned out of *WAP* and into PWI's *ADP* have less access to customized employment due to the lack of available employment sites and more generally participate in recreational activities or volunteerism. Clients employed in SE/IP and SE/GS are supported in their community-integrated jobs through job coaching, although these jobs may not have necessarily been customized or courted for each person. PWI offered 5 *Discovery Days* in our Chula Vista office in which parents, individuals served, and other community members were able to learn about the various setting options available to them, but due to staff time, and organizational resources, PWI has not been able to offer these events to the other three office locations.

Project Narrative Description:

2. Please provide a brief summary narrative of the concept for which you are requesting funding, including justification for the funding.

PWI's Redemption Plan: Continuing the Implementation of DREAMS

Phase I: Discovery- PWI is requesting funds for the salaries of our Career Path Manager (CPM) and Career Path Coordinator (CPC) to continue providing online career assessments to individuals served in our SE/GS and SE/IP programs. This will help discover new career interests, areas for growth, and environments best suited for each person's needs and preferences. Phase II: Reinforcement- PWI's CPM and CPC will help the client validate the setting option they have chosen through outings, job observation and more. Additionally, PWI is requesting funds to help support our Program Director as they arrange for clients to try different setting options before making a commitment to them.

Phase III: Educate-. PWI is requesting funds to employ a Community Outreach Coordinator (COC) who will use outreach materials, such as brochures and flyers, to help

educate our clients, their families, and counselors on setting options at our 18 in-house *Discovery Days* to be held regularly throughout the 2 years of this project. Additionally, the *COC* would begin outreach to businesses and paid employment sites based off of the transition plans for each individual. **Phase IV: Apply-** PWI hopes to enrich our inventory of setting options for clients to choose from by employing our *COC* who will refer each client to the most appropriate program using his or her transition plan. Funds for paid advertisements will help increase the number of business partners join PWI's inventory. **Phase V: Motivate-** By providing client, family, and counselor education and understanding, PWI will motivate those we serve to pursue Competitive Integrated and/or Customized Employment options versus congregated services, such as WAP. **Phase VI: Sustain-** PWI's *Program Director* will be responsible for tracking the progress and outcome indicators of all client's chosen transition plans such as reviewing any promotions, terminations, needs, and client satisfaction rates. Having the staff available for this choice tracking is critical for this redemption plan.

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<u> 3</u> 4<u> 5</u> 6<u> 7</u> 8<u> 9</u> 10_

Federal Requirement #1

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.

Barriers to Compliance

- Lack of paid customized employment sites
- Staff ratios don't support customized employment approach
- Lack of understanding, training, and education on HCBS federal requirement and resources available through PWI.

Previous HCBS funding helped expand setting options and began transitioning clients out of WAP and into the community integrated setting of their choice. Generally, clients and their families are unfamiliar with the structure of the setting options; therefore, they need more information regarding the community-integrated programs available. The implementation *DREAMS* requires family education and outreach, business and job development and marketing resources for true success.

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.

This concept will allow PWI to provide individualized, person-centered services to all of our programs and services through the client's validation of services offered. PWI will be able to ensure that services provided are based on individual's choices and not on employer need or PWI staff availability. With new staff in place to find more options for our clients, we will be able to offer "subbing" opportunities for clients to experience different setting options including new paid employment sites prior to transferring. These paid opportunities and ongoing support help clients maintain interest in transferring to CIE or CE setting options. Lastly, our *Discovery Days* will help individuals, their families, and counselors learn about the HCBS Federal Requirements and inspire them to adopt

its benefits, values, and success.

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

Over 2 years, PWI will accomplish the following objectives and outcomes that will be tracked using our Outcomes and Measurement System already in place.

- Host 18 Discovery Days in which individuals served, their families and counselors will learn about the setting options available to them. Providing light food and beverages will help increase attendance and interest of these events. Lastly, by using our locations, we are not only saving costs, but also providing a more accessible space for these events.
- Career Path Coordinator and Career Path Manager will continue PWI's prior HCBS concepts with additional support from PWI's Program Director.
- Hire our *Community Outreach Coordinator* to use outreach materials, and paid advertisements to identify employers enriching PWI's inventory of setting options.
- 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.

PWI's Career Path Coordinator has assessed over 200 individuals in four different offices across San Diego County. These assessments produced the needs, preferences, and career aspirations of not only individuals served in PWI's WAP, but also that of their care providers and relatives. After review of these assessment results, PWI learned that our inventory of paid employment sites are lacking in comparison to where our clients are requesting to work. Additionally, PWI holds Client Forums in all of our WAP's where clients share their concerns, suggestions, and announcements to other clients and PWI staff.

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

With the implementation of prior HCBS concepts, PWI has learned ways in which individuals can advocate for choices for employment and integration into the community. By providing the *Discovery Days*, hiring a Community Outreach Coordinator, and sharing the services available from PWI, we can share these personcentered services with our community and individuals served within it.

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

PWI's 2017-2021 Strategic Plan outlines not only the plan for transitioning out of WAP, but it also provides justification citing the benefits of this movement as well as regulations such as The Lanterman Act, and HCBS Federal Requirements. Once PWI has completed prior HCBS concepts, all of our staff will have received Person-Centered Planning training and approximately 20% will have been trained in Customized Employment. PWI contracted with our CE trainer to provide leadership training and training models to be incorporated in all onboarding of new staff, thereby truly immersing these values in all that we do.

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).

 $\underline{\text{http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=4629.7\&lawCode=WIC}$

Career Path Coordinator: (Base hourly rate \$15.50 + \$9,803 annual benefits costs). Career Path Manager: (Base hourly rate \$22 + \$11,330 annual benefits costs). **Program Director:** (High range salary rate \$70,000 + \$14,070 annual benefits costs). Community Outreach Coordinator: (Base hourly rate \$15.50 + \$9,803 annual benefits costs). Advertising: Used for fees for radio and TV ads, featuring client and employer success stories, and attendance at community diversity panels such as People First, LiveWell, DDPN, and more. (\$30 per client @ 401 individuals served). Food and Beverages for Discovery Day Attendees: (\$100 per event @ 18 events). Outreach **Materials:** Used to help existing clients and new referrals understand the programs, services, and setting options available to them. Examples include flyers, brochures, and client-friendly worksheets. (\$16 per client @ 401 individuals served). Facility Costs: Used to subsidize the costs of the 18 Discovery Days in 3 offices (6 per office) as they will be held at PWI's facilities. (Average of \$1,460 per day @ 18 Discovery Days). Administrative Expenses: Used to cover the indirect costs associated with the implementation of this concept, and its reporting. (15% of operating, and personnel expenses.)

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 San Diego Regional Center and the Department of Rehabilitation have been working on an employment services program pilot project that will use the Customized Employment Service model to help transition clients with disabilities out of congregate work settings, and into CIE. In correspondence with our regional center, PWI has learned our *DREAMS* project may qualify for vendorization under this pilot vendor code. PWI plans to meet these requirements in order for this program to become SDRC and DOR funded project. The requirements for vendorization at this time are: certifying our staff in ACRE CE training (ON TRACK), hiring the staff needed for this project (NEED TO COMPLETE), and sustaining the other costs associated with this project (ON TRACK).

Other plans for sustainability of this project are listed:

- Use of existing programs and services that are vendorized through SDRC thereby funding staff salaries, program supplies, and other program expenses.
- Exploration of scholarships or grants outside of HCBS to fund other costs associated with this project.

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) 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.

2017 Project: Hired our Career Path Coordinator, Developed Career Path Plan, DREAMS, & purchased a van to help transport clients throughout community settings.
2018 Project: Purchased 700 COPS Assessments & evaluated over 200 individuals.
2019 Project: Hired our Career Path Manager, ACRE Training in CE, Person-Centered Planning, & offered 10 Employer Speaking Engagements.

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 any prior funding and builds on our organizational capacity towards full compliance. This funding will help PWI market to the general public, educate, discover, and apply the final project deliverables for PWI to meet Federal Requirement #1. We have seen the success of *DREAMS* by providing 1:1 services to our WAP clients, now it is time to sustain this program to our other services and programs, namely SE/IP, SE/GS, and ADP. PWI has seen the positive impact of our redemption plan and believe that this funding will help us repeat those successes to all others we serve while learning from our experience of already transitioning one WAP program in the Chula Vista.

HCBS CONCEPT BUDGET									
Vendor Name		Partnerships With Industry							
Vendor Number(s)	954, 510, 95	-							
		Yea	ar 1 E	Budget	Ye	ar 2 B	udget		Total
	Salary and								
	Benefits	FTE		Annual Cost	FTE		Annual Cost		Cost
Personnel (salary + benefits)									
Career Path Coordinator	42,043	1.00	\$	42,043	1.00	\$	43,119	\$	85,162
Career Path Manager	57,091	1.00	\$	57,091	1.00	\$	58,619	\$	115,710
Program Director	84,070	0.50	\$	42,035	0.50	\$	42,035	\$	84,070
Community Outreach Coordinator	42,043	1.00	\$	42,043	1.00	\$	42,043	\$	84,086
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
			\$	-		\$	-	\$	-
Personnel Subtotal			\$	183,212		\$	185,816	\$	369,028
Operating expenses									
Advertising			\$	6,015		\$	6,015		12,030
Food and beverages for Discovery D	Day attendees		\$	900		\$	900	\$	1,800
Outreach Materials			\$	3,208		\$	3,208		6,416
Facility Costs			\$	7,310		\$	7,310		14,620
			_					\$	-
								\$	-
								\$	-
								\$	-
			_					\$	-
				47.400		4	47.400	\$	
Operating Subtotal			\$	17,433		\$	17,433	\$	34,866
Administrative Expenses			_			_			
Administrative Expenses			\$	30,276		\$	30,276		60,552
			_					\$	-
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Administrative Subtotal			\$	30,276		\$	30,276	\$	60,552
Capital expenses			ب	30,276		٠	30,270	٦	60,332
Capital expelises		_	_			_		\$	-
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Capital Subtotal			\$	_		\$	-	\$	-
Total Concept Cost			\$	230,921		\$	233,525	\$	464,446
. Sta. Concept Cost			Y	230,321	-	Y	233,323	٧	707,740

See Attachment F for budget details and restrictions