

COMMUNITY-BASED NEUROBEHAVIORAL REHABILITATION SERVICES PROVIDER (CNRS) PROVIDER QUALITY SELF-ASSESSMENT 2024 Edition

Instructions

This form is required for organizations enrolled to provide Community-Based Neurobehavioral Rehabilitation Services (CNRS) services. The CNRS Provider Quality Self-Assessment form is a fillable PDF and the form must remain in that format upon submission. It includes an electronic signature attesting that the information submitted is true, accurate, complete, and verifiable. Organizations are responsible for ensuring signatory authority. The annual CNRS Provider Quality Self-Assessment training and corresponding Frequently Asked Questions (FAQs) addresses some common problems with completing and submitting the self-assessment and can be found <u>here</u>¹.

Each organization is required to submit an acceptable self-assessment by a designated due date each year. Failure to submit a complete and accurate self-assessment by the designated due date will result in a referral to Iowa Medicaid's Program Integrity Unit for appropriate action, which may include sanctions and disenrollment from Iowa Medicaid.

Below is a brief explanation of each section of the CNRS Provider Quality Self-Assessment form. For full instructions, troubleshooting tips, and training on the annual CNRS Provider Quality Self-Assessment, please follow the links above.

- I. <u>Organizational Details (page 4).</u> Identifies the organization submitting the forms.
- II. <u>Service Locations (page 5)</u>. Identifies the locations where your organization provides CNRS.
- III. <u>Self-Assessment Questionnaire (page 6)</u>. Provides an outline of all basic standards required by law, rule, industry standards, or best practice. You should read each standard, consider your organization's current situation, and select the most appropriate response.

Selecting **Yes** means your organization meets the standards and would be able to provide verifiable evidence of meeting the standard. You may meet the standard because you are required to by law or rule, organization policy, or because your organization does so as best practice or because you are required to by another oversight entity outside of lowa Medicaid.

Selecting **No** means your organization does not meet the standard but is required to by law, rule, or organization policy or the standard is otherwise necessary for the services your organization is enrolled to provide. If you select No, you must provide a response in the designated box describing your plan to

¹ <u>https://hhs.iowa.gov/programs/welcome-iowa-medicaid/iowa-medicaid-programs/hcbs</u> 470-5551 (Rev.12/24)



meet the standard(s). A plan is sometimes also known as a "remediation plan," corrective action plan, or "CAP." It describes what the organization will do correct the problem with specific timelines for achieving compliance.

Selecting **NA** means the standard is not required by law, rule, or organization policy and is not otherwise necessary for the services your organization is enrolled to provided.

At the end of each topic, there is an opportunity for your organization to highlight how you meet or exceeds the requirements.

IV. <u>Guarantee of Accuracy (page 18).</u> Identifies your organization's pertinent certifications, accreditations, and licensures. The Guarantee of Accuracy also requires your organization to attest that the information and responses are true, accurate, complete, and verifiable.

Questions should be directed to the HCBS Specialist assigned to the county where the parent organization is located. For a complete list of Quality Improvement Organization (QIO) HCBS Quality Oversight Unit contacts and a list of HCBS Specialists by region, please click <u>here²</u>.

² <u>https://hhs.iowa.gov/programs/welcome-iowa-medicaid/iowa-medicaid-programs/hcbs</u> 470-5551 (Rev.12/24)



Links and Resources

- Department of Inspections, Appeals, and Licensing (DIAL) Website³
- Iowa Department of Health and Human Services (HHS) Website⁴
 - Provider Quality Self-Assessment Webpage⁵
 - Provider Services and Provider Enrollment Webpage⁶
 - <u>Competency-Based Training (CBT) and Technical Assistance for Long-</u> Term Services and Supports (LTSS) Webpage⁷
- Informational Letters (ILs)⁸
- <u>Iowa Administrative Code and Rules</u>⁹ (IAC)
- Iowa Code¹⁰ (IC)
- <u>Code of Federal Regulations</u>¹¹ (CFR)

⁸ https://secureapp.dhs.state.ia.us/impa/Information/Bulletins.aspx

³ <u>https://dial.iowa.gov/</u>

⁴ https://hhs.iowa.gov/

⁵ https://hhs.iowa.gov/programs/welcome-iowa-medicaid/iowa-medicaid-programs/hcbs

⁶ <u>https://hhs.iowa.gov/programs/welcome-iowa-medicaid/provider-services/provider-enrollment</u>

⁷ https://hhs.iowa.gov/programs/welcome-iowa-medicaid/provider-services/provider-trainings/cbt

⁹ <u>https://www.legis.iowa.gov/law/administrativeRules/agencies</u>

¹⁰ https://www.legis.iowa.gov/law/statutory

¹¹ https://www.ecfr.gov/

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I.

ORGANIZATION DETAILS

Please identify your parent organization by providing the following information using the text entry fields below. Tax Identification Number (TIN) (9 digits):

Associated N	⊃I (list all):				
Organization I	Name (as regis	tered with lowa	a Medicaid):		
Mailing Addre	SS:		Physical Addr	ress:	
City:	State:	Zip:	City:	State:	Zip:
County:			County:		
Executive Dire	ector/Administra	ator:	Title:		
Email:			Telephone:		
Self-Assessm	ent Contact:		Title:		
Email:			Telephone:		
Organization	Website:		L		



II. SERVICE LOCATIONS

Complete the fields below to identify each location where your organization provides CNRS.

If CNRS is provided at the location listed in section 1., include it again in section II.

Check this box if organization has more than 9 service locations. If checked, leave section II. blank. An HCBS Specialist will contact you with an additional document to complete.

	Location 1	Location 2	Location 3
Location Name			
Location Address			
City			
State			
NPI-Legacy Number			
Director/Administrator, Credentials			
	Location 4	Location 5	Location 6
Location Name			
Location Address			
City			
State			
NPI-Legacy Number			
Director/Administrator,			
Credentials			
	Location 7	Location 8	Location 9
Location Name			
Location Address			
City			
State			
NPI-Legacy Number			
Director/Administrator, Credentials			



III. SELF-ASSESSMENT QUESTIONNAIRE

A. ORGANIZATIONAL STANDARDS

To provide quality services to members, organizations must have soun administrative and organizational practices and a high degree of accou- and integrity. Organizations should have a planned, systematic, organization-wide a to designing, measuring, evaluating, and improving its level of perform Use this section to tell us what your organization has in place or is wor put in place related to basic standards required by law, rule, industry standards, or best practice.	untability pproach iance.
1. PURPOSE AND MISSION	
Does your organization	
a) Have a mission statement that aligns with the needs, ability, and desires of the members served?	□Yes
If indicating "No," you must describe a plan to meet the standard(s). Attach a	
information as necessary.	
2. FISCAL ACCOUNTABILITY	
Does your organization	1
a) Ensure fiscal stability and accountability?	□Yes □No □NA
b) Maintain fiscal and corresponding clinical records for a minimum of five	
years after the date of the last claim?	
	□NA
If indicating "No," you must describe a plan to meet the standard(s). Attach a information as necessary.	additional
3. ORGANIZATIONAL OVERSIGHT	
Does your organization	
a) Have a committee, board, or advisory board to oversee operations?	□Yes □No □NA



b) Ensure the committee, board, or advisory board receives and uses input from local community stakeholders, employees and members participating in services?	□Yes □No □NA
c) Maintain committee or board meeting minutes to demonstrate oversight and active engagement in the organization?	□Yes □No □NA
If indicating "No," you must describe a plan to meet the standard(s). Attach ad information as necessary.	ditional
4. QUALITY IMPROVEMENT (QI) PROCESSES Does your organization	
 a) Have an established systematic, organization-wide, planned approach to designing, measuring, evaluating, and improving the level of its performance, including the efficiency and effectiveness of service provision? 	□Yes □No □NA
b) Ensure results of satisfaction or experience surveys are shared with the public?	□Yes □No □NA
 c) Ensure QI activity reports and results are shared with the committee, board, or advisory board at least annually. 	⊡Yes ⊡No □NA
Does the QI process include	
 d) Discovery (collection and review) of the following minimum information and data topics? 	⊡Yes ⊡No
 Members' preadmission location of service 	□NA
 Members' length of stay 	
 Discharge location 	
 Reason for discharge 	
 Access to services 	
 Incident data 	
 Quarterly review of organizational activities and services 	
 Satisfaction and experiences with services with members, caregivers or involved family of members, employees, and other stakeholders 	
 Review of records at regular intervals to include service documentation, medication records, incident reports, abuse reports, appeals and grievances, and personnel records 	



e) Remediation of areas found through the QI process to be in need of improvement?	□Yes □No □NA
f) Improvement, meaning the demonstration of outcomes of discovery and remediation?	□Yes □No □NA
If indicating "No," you must describe a plan to meet the standard(s). Attach ac information as necessary.	
Is there anything else you would like to highlight about your organization that demonstrate how you exceed the basic requirements outlined under organization standards?	
B. PERSONNEL AND TRAINING Organizations must have qualified employees and contractors commen with the needs of the members served and requirements for the employ contractor's position. Employees and contractors should be competent perform duties and interact with members. Use this section to tell us we organization has in place or is working to put in place related to person training standards required by law, rule, industry standards, or best pra-	ree's or to hat your nel and
1. EMPLOYEE SCREENING AND EVALUATION Does your organization	
a) Complete child and dependent adult abuse background checks prior to hiring an applicant pr potential contractor?	□Yes □No □NA
b) Complete state and federal criminal background checks prior to hiring an applicant or potential contractor?	□Yes □No □NA
c) Solicit an evaluation and follow recommendations for hire when a hit is found on a background check?	□Yes □No □NA
 d) Complete checks of sex offender registries prior to hiring an applicant or potential contractor? 	□Yes □No □NA
 e) Screen applicants and potential contractors for exclusion from participation in federal insurance programs prior to hire? 	□Yes □No □NA



,	Ensure employees and contractors are minimally qualified by age, education, certification, experience, and training required or	□Yes
	recommended for CNRS?	□No □NA
g)	Ensure employees and contractors have valid drivers' licenses as	□Yes
	required for the services provided?	□No
b)	Ensure employees and contractors have adequate vehicle insurance	□NA □Yes
,	as applicable for the services provided?	⊡ res ⊡No
		□NA
i)	Complete performance evaluations at least annually to ensure	□Yes
	employees and contractors are competent to perform duties and interact with members?	□No
If ind	licating "No," you must describe a plan to meet the standard(s). Attach a	□NA dditional
	mation as necessary.	aanona
2. TF	RAINING AND QUALIFICATIONS	
Does	s your organization train employees and contractors on the following req	uired or
	mmended topics within the identified timeframes? Prior to the commencement of direct service provision:	
a)	Phot to the commencement of direct service provision.	
	1) The designated Traumatic Brain Injury Training (modules 1-2)	□Yes
		□No
		□No □NA
	2) Members' rights	□No □NA □Yes
	2) Members' rights	□No □NA □Yes □No
	,	□No □NA □Yes □No □NA
	2) Members' rights3) Confidentiality and privacy	□No □NA □Yes □No □NA □Yes
	,	□No □NA □Yes □No □NA □Yes □No
	3) Confidentiality and privacy	□No □NA □Yes □No □NA □Yes □No □NA
	,	□No □NA □Yes □No □Yes □No □NA □Yes
	3) Confidentiality and privacy	□No □NA □Yes □No □NA □Yes □No □NA □Yes □No
	3) Confidentiality and privacy	□No □NA □Yes □No □NA □Yes □No □NA □Yes □No □NA
	 3) Confidentiality and privacy 4) Individualized rehabilitation treatment plans 	□No □NA □Yes □No □NA □Yes □No □NA □Yes □No
	 3) Confidentiality and privacy 4) Individualized rehabilitation treatment plans 	□No □NA □Yes □No □NA □Yes □No □NA □Yes □NA □Yes
b)	 3) Confidentiality and privacy 4) Individualized rehabilitation treatment plans 	□No □NA □Yes □No □NA □Yes □No □NA □Yes □No □NA
b)	 3) Confidentiality and privacy 4) Individualized rehabilitation treatment plans 5) Major mental health disorder basics 	□No □NA □Yes □No □NA □Yes □No □NA □Yes □No □NA
b)	 3) Confidentiality and privacy 4) Individualized rehabilitation treatment plans 5) Major mental health disorder basics Within 30 days o/f the commencement of direct service provision: 	□No □NA □Yes □No □NA



2) First-aid	□Yes
	□No
	□NA
3) Fire prevention and reaction	□Yes
	□No
4) Universal precautions	□Yes
	□No
	□NA
5) The organization's policy related to identifying and reporting	□Yes
abuse	□No
	□NA
c) Within the first 6 months of the commencement of direct service prov	rision:
1) The promotion of a program structure and support for persons	□Yes
served so they can relearn or regain skills for community inclusion and access	□No
	□NA
2) Compensatory strategies to assist in managing ADL's (activities of	□Yes
daily living)	□No
	□NA
3) Quality of life issues	□Yes
	⊡ No
	□NA
4) Behavioral supports and identification of antecedent triggers	
4) Benavioral supports and identification of antecedent triggers	□Yes
	□No
	□NA
5) Health and medication management	□Yes
	□No
	□NA
6) Dietary and nutritional programming	□Yes
	□No
	□NA
7) Assistance with identifying and utilizing assistive technology	□Yes
	⊡ No
	□NO
0) Cubatanas abuss and addisting incurs	
8) Substance abuse and addiction issues	□Yes
	□No
	□NA



9) Self-management and self-interaction skills	□Yes
, 3	□No
	□NA
10) Flexibility in programming to meet members' individual needs	□Yes
	□No
	□NA
11) Teaching adaptive and compensatory strategies to address	□Yes
cognitive, behavioral, physical, psychosocial, and medical needs	□No
	□NA
12) Community accessibility and safety	□Yes
	□No
	□NA
13) Household maintenance	□Yes
	⊡No
	□NA
(4) Our part to the mean $h = u^2 - f_{0} u^2 + u^2 +$	
14) Support to the member's family or support system related to the member's neurobehavioral care	□Yes
	□No
	□NA
15) The designated Child and/or Dependent Adult Abuse and	□Yes
Mandatory Reporting training (within 6 months of hire or by having	□No
proof of the completion of the training prior to hire)	
d) Within 12 months of the commencement of direct service provision:	
1) An approved, nationally recognized certified brain injury specialist	□Yes
training	□No
	□NA
e) Annually or as otherwise required:	
1) Fire prevention and reaction	□Yes
	□No
	□NA
2) Universal precautions	□Yes
	□No
3) Cardiopulmonary resuscitation (CPR) (prior to expiration of the	□No
 Cardiopulmonary resuscitation (CPR) (prior to expiration of the certification) 	□No □NA □Yes
	□No □NA □Yes □No
certification)	□No □NA □Yes □No □NA
	□No □NA □Yes □No □NA □Yes
certification)	□No □NA □Yes □No □NA



 The designated Child and/or Dependent Adult Abuse and Mandatory Reporting additional training at least every 3 years after the initial training 	□Yes □No □NA
f) Does the organization ensure that the program administrator is a Certified Brain Injury Specialist Trainer (CBIST) through the Academy of Certified Brain Injury Specialists or a certified brain injury specialist under the direct supervision of a CBIST or a qualified brain injury professional as defined in rule 441 IAC 83.81(249A) with additional certification as approved by the department?	□Yes □No □NA
 g) Does the organization ensure that a minimum of 75% of the organization's administrative and direct care personnel: have a bachelor's degree in human services-related field; or have an associate degree in human services with two years of experience working with individuals with brain injury; or are in the process of seeking a degree in the human services field with two years of experience working with individuals with individuals with brain services field with two years of experience working with individuals with individuals with brain services field with two years of experience working with individuals with individuals with brain injury; or are a certified brain injury specialist or have other brain injury certification as approved by the department. 	□Yes □No □NA
If indicating "No," you must describe a plan to meet the standard(s). Attach ac information as necessary.	Iditional
Is there anything else you would like to highlight about your organization that demonstrate how you exceed the basic requirements outlined under personn training?	

С.	POLICIES	AND	PROCEDURES

Organizations should have a core set of policies and procedures based on the services for which they are enrolled to provide. The policies and procedures are the foundation of an organization's performance and guide them in the provision of services. Policies and procedures should outline the organization's day-to-day operations, ensure compliance with laws and regulations, and give guidance to staff. Organizations must carry out their policies and procedures so that members receive fair, equal, consistent, and positive service experiences. Use this section to tell us what your organization has in place or is working to put in place related to topics listed below required by law, rule, industry standards, or best practice.

1. INCIDENTS AND INCIDENT REPORTING	
 a) Does your organization have written policies or procedures related to recognizing and reporting major and minor incidents in accordance with applicable IAC? 	□Yes □No □NA
b) Does your organization maintain evidence incidents are reported according to the policy?	□Yes □No □NA
c) Does your organization track and analyze data at least annually, related to incidents and unexpected occurrences involving death, serious physical or psychological injury, or the risk thereof to identify trends and to ensure the health and safety of members?	□Yes □No □NA
If indicating "No," you must describe a plan to meet the standard(s). Attach additional information as necessary.	
2. APPEALS AND GRIEVANCES	
 a) Does your organization have written policies and procedures related to filing and resolving appeals and grievances? 	□Yes □No □NA
b) Does your organization maintain evidence that you followed your written policies and procedures related to appeals and grievances?	□Yes □No □NA
c) Does your organization ensure that members or their legal representatives receive information about the organization's appeals and grievance processes at admission and annually thereafter?	□Yes □No □NA
If indicating "No," you must describe a plan to meet the standard(s). Attach additional information as necessary.	



3. TREATMENT PLANNING	
 a) Does your organization have written policies and procedures related to treatment planning? 	□Yes □No □NA
b) Does your organization ensure that treatment plans:	
 Are individualized and mutually developed by the member and the member's treatment team? 	□Yes □No □NA
2) Include the member's strengths, barriers, and interests?	□Yes □No □NA
3) Include goals which are based on the member's need for services?	□Yes □No □NA
4) Include neurobehavioral challenges and environmental needs as identified in the member's individual standardized comprehensive functional neurobehavioral assessment?	□Yes □No □NA
5) Are evaluated by the member and the member's treatment team for progress towards treatment goals regularly and no less than quarterly?	□Yes □No □NA
6) Are revised as the member's status or needs change to reflect the member's progress and response to treatment?	□Yes □No □NA
7) Are submitted to Iowa Medicaid for approval within 30 days of admission (initial plan only)?	□Yes □No □NA
8) Do not exceed 180 days?	□Yes □No □NA
If indicating "No," you must describe a plan to meet the standard(s). Attach additional information as necessary.	



a) Does your organization have written policies and procedures related	□Yes		
to the use of restrictive interventions, specifically restraints, rights	□No		
restrictions, crisis intervention, and behavioral intervention in	□NA		
accordance with applicable IAC?			
b) If your organization allows for the use of physical holds, restraints, or	□Yes		
other physical intervention techniques, do policies and procedures	□No		
governing their use include all the following?	□NA		
 Definitions of the use of physical restraint such as the specific types 			
of interventions allowed and specific circumstances when physical			
 intervention may be used. Designation of and qualifications and special training required for 			
staff who may authorize or administer restraints.			
 A description of methods used to monitor and control the use of 			
restraints.			
c) Are restrictive interventions implemented in accordance with	□Yes		
applicable IAC which requires that members always receive kind and	□No		
considerate care and are free from mental, physical, sexual, and	□NA		
verbal abuse, exploitation, neglect, and physical injury?			
d) When a physical restraint is used, is it documented, including all	□Yes		
the following information?	□No		
 A general description of the circumstances leading to the use of 	□NA		
the restraint and what happened during and after the use of the			
 physical restraint. Rationale for the use of the restraint. 			
 A description from the responsible staff of the staff's actions and 			
procedures used to protect the member's rights and ensure			
safety.			
 Identification of who authorized the restraint. 			
 Identification of when the use of the restraint was authorized (i.e., 			
prior to or immediately after).			
e) Does your organization ensure that the member's primary care	□Yes		
provider, Interdisciplinary Team (IDT), and the member's responsible	□No		
party are notified when a physical restraint is used?	□NA		
f) Does your organization ensure that members or their responsible	□Yes		
parties are provided informed consent for any restrictive	□No		
interventions that may be required to protect the health and safety of	□NA		
the member?			
If indicating "No," you must describe a plan to meet the standard(s). Attach			
additional information as necessary.			
5. MEMBERS' RIGHTS AND RESPONSIBILITIES			



 a) Does the organization have written policies and procedures related to member rights and responsibilities? 	□Yes □No □NA
b) Does the policy address the member's right to be fully informed of their rights and responsibilities as a resident and of all rules governing their conduct and responsibilities?	□Yes □No □NA
 c) Are member rights and responsibilities communicated in writing within 5 days of admission member and staff expectations. 	□Yes □No □NA
d) Are member rights and responsibilities presented in a language understandable the individual member?	□Yes □No □NA
 e) Are members made aware of their rights with 5 days of admission and within 30 days of changes to the written rights and responsibilities? (A statement must be signed by the member or the member's responsible party and maintained in the member's record indicating an understanding of rights and responsibilities.) 	□Yes □No □NA
f) Is the list of member's rights prominently posted in written format, in a location that is available to all members?	□Yes □No □NA
If indicating "No," you must describe a plan to meet the standard(s). Attach additional information as necessary.	
6. DOCUMENTATION OF SERVICES	_
 a) Does your organization have written policies and procedures related to service documentation? 	□Yes □No □NA
b) Does service documentation identify the specific service(s) being provided?	□Yes □No □NA
c) Does service documentation identify the member receiving the service(s), including the first and last name?	□Yes □No □NA
 d) Is the complete date and time of the service documented, including the beginning and ending time and beginning and ending date if the service(s) is rendered over more than one day? 	□Yes □No □NA



e)	Is the location where the service(s) was provided documented as applicable?	□Yes □No □NA
f)	When transportation is provided as part of the service(s), is the name, date, purpose of the trip, and total miles documented?	□Yes □No □NA
g)	Are incidents, illnesses, unusual or atypical occurrences that occur during service provision documented when applicable?	□Yes □No □NA
h)	When medication is administered or supplies are dispensed as part of the service(s), is the name, dosage, and route of administration documented?	□Yes □No □NA
i)	Does service documentation legibly identify the person providing the service(s) including first and last name, any applicable credentials and signature or initials if verifiable to a signature log?	□Yes □No □NA
j)	Does the service documentation demonstrate that the service is provided as defined and authorized?	□Yes □No □NA
k)	Does service documentation for each service provide information necessary to substantiate that the service was provided?	□Yes □No □NA
addil	licating "No," you must describe a plan to meet the standard(s). Attach tional information as necessary.	
	EMBER OUTCOMES	
a)	Does the organization have written policies and procedures related to outcome- based standards?	□Yes □No □NA
b)	Does the organization maintain evidence that members are valued?	□Yes □No □NA
c)	Do members or their responsible party provide consent regarding which personal information is shared and with whom?	□Yes □No □NA



d) Does the organization maintain evidence that members receive assistance with accessing financial management services as needed?	□Yes □No □NA	
 e) Does the organization maintain evidence that members receive assistance with obtaining preventative, appropriate, and timely medical and dental care? 	□Yes □No □NA	
f) Does the organization maintain evidence that members receive assistance with obtaining preventative, appropriate, and timely medical and dental care?	□Yes □No □NA	
g) Does the organization maintain evidence that the members' living environment is reasonably safe and located in the community?	□Yes □No □NA	
h) Does the organization maintain evidence that each member's desire for intimacy is respected and supported?	□Yes □No □NA	
If indicating "No," you must describe a plan to meet the standard(s). Attach additional information as necessary.		
Is there anything else you would like to highlight about your organization that would demonstrate how you exceed the basic requirements outlined under organizational standards?		
IV. GUARANTEE OF ACCURACY		

In submitting this CNRS Provider Quality Self-Assessment and signing this Guarantee of Accuracy, the organization and all signatories jointly and severally certify that the information and responses on contained within are true, accurate, complete, and verifiable. Further, the organization and all signatories each acknowledge (1) familiarity with the laws and regulations governing the Iowa Medicaid program; (2) the responsibility to request technical assistance from the appropriate HCBS Specialist in order to achieve compliance with the standards listed within this assessment; (3) the Department, or an authorized representative, may conduct desk or on-site reviews on a periodic basis, as initiated by random sampling or as a result of a complaint. **NOTICE: Any person that submits a false statement, response, or representation, or any false, incomplete, or misleading information, may be subject to criminal, civil, or administrative liability.**

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Is your organization in good standing with the identified accreditation or licensing entity? \Box Yes \Box No

*If your organization received less than the maximum level of accreditation or licensure with the identified accreditation or licensing entity, you must also provide the review results and any remediation plans when submitting this CNRS Provider Quality Self-Assessment.

PRINTED NAME of Organization

PRINTED NAME of Executive Director

PRINTED SIGNATURE* of Executive Director

Date

*By typing my name, I am electronically signing this document in accordance with lowa Code Chapter 554D.