



# **North Carolina College of Direct Support Demonstration Project Final Report**

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## Overview

In 2007, the North Carolina Council on Developmental Disabilities funded a three-year project to demonstrate the use of the College of Direct Support (CDS) curriculum. The demonstration project was conducted through the North Carolina Providers Council and was implemented with North Carolina organizations that support children and adults with developmental and other disabilities. The purpose of the project was to demonstrate the use of CDS and to document both individual and organizational outcomes. Key demonstration goals included the following —

- To implement CDS in up to nine organizations, while maximizing the number of learners in each organization.
- To develop recognition and incentive programs for direct support professionals (DSPs) through implementation of CDS.
- To reduce organizational turnover and vacancy rates.
- To improve DSP competence in critical areas, including person-centered services and supports, cultural competence, confidentiality through the Health Insurance Portability and Accountability Act (HIPAA), rights and choices, and medication supports.
- To demonstrate the cost-effectiveness of this approach to training.

This report summarizes the experiences and outcomes of the CDS demonstration project in North Carolina.

## The Need for the College of Direct Support in North Carolina

The direct support profession is one of the fastest growing industries in North Carolina (North Carolina Department of Labor, 2009). DSPs provide support to people receiving community human services in a wide range of activities such as meeting personal needs, making friends, finding a job, understanding rights and making choices, taking medications, learning new skills, and facilitating connections to the people, resources, and experiences necessary to live fully and safely in communities of their choice.

The rate of turnover in the direct support profession continues to be high, despite the widespread unemployment in our current economy. State employment projections indicate that there will continue to be a substantial lack of candidates to fulfill the needs of this industry in the future. The need to provide a competent, sustainable, and valued direct support workforce is a critical factor in meeting the needs of people with intellectual, developmental, and other disabilities in the long-term services and supports industry in North Carolina. CDS works to improve this situation by providing the industry with national credibility and by bringing a sense of value and responsibility to the workforce.

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I have had employees tell me they thought they were doing their jobs to the best of their abilities, but the learning and interaction of CDS showed them simple duties at a newer, higher level. I also had several employees tell me that they had been in this field for many years, but had learned a lot from CDS.



## What is the College of Direct Support?



CDS is a dynamic, competency-based, online curriculum offering comprehensive training for DSPs. It was developed following careful analysis of the knowledge, skills, and attitudes required of DSPs and helps users understand and apply competencies and ethical practices through timely, innovative, and engaging training. The CDS curriculum is specifically designed for learners that provide support and services to individuals with intellectual/developmental disabilities, mental illness, and co-occurring disabilities. It includes courses and competency measures that are useful to and elevate the skill level of both DSPs and frontline supervisors.

The CDS curriculum was developed by staff of the Research and Training Center on Community Living at the University of Minnesota. CDS authors are experienced trainers and curriculum designers who also have experience working as DSPs. In addition, nearly all CDS authors have family members with disabilities. Each CDS course is edited and peer-reviewed by leading national content and training experts on the course topic. A National Advisory Board guides the development of all CDS courses. (To learn more about the national editors and advisory board members, go to [collegeofdirectsupport.com](http://collegeofdirectsupport.com) and click National Advisory Board under the About menu.)

CDS is currently used in 31 states, 12 of which have statewide implementation contracts. Across the

country, CDS is used daily by a total of 182,660 learners. Nationally, CDS learners have completed 2,841,953 hours of training.

The CDS curriculum is regularly updated and at least four new courses are added annually. At the time of this demonstration project, the CDS curriculum was comprised of 26 courses with 145 unique lessons. Each course is fully narrated, rich in the use of media, and includes personal stories from multiple perspectives, including individuals with disabilities, family members, and DSPs. CDS has three assessment components; pre- and post-tests, on-the-job skill demonstration checklists, and suggested portfolio work samples.

In addition to the course content, CDS includes a learning management system. This system enables courses within CDS to be customized to meet the needs of DSPs and their employers. Content can be added to any page via links or annotations. The learning management system also enables providers to track the training of each member of their workforce, including both CDS courses and other classroom and training events. The North Carolina College of Direct Support site has been customized using these features. Its customized annotations were created by a workgroup made up of staff from participating member agencies of the North Carolina Providers Council. They ensure that North Carolina policies with respect to prevention of maltreatment and other important topics are included in CDS course content. (More information about the CDS learner management system can be found at [collegeofdirectsupport.com](http://collegeofdirectsupport.com).)

## How Has the College of Direct Support Been Used in North Carolina?

The demonstration project in North Carolina was conducted by the North Carolina Providers Council. The Council is the state's largest cross-disability provider association. It includes 82 member agencies that provide services to over 90,000 people with intellectual and developmental disabilities, mental illness, and co-occurring conditions. Services are provided within all 100 counties of North Carolina. Nine member agencies of the North Carolina Providers Council participated in the CDS demonstration project. These organizations varied greatly and represented diverse geographic areas of the state (see Figure 1). These organizations entered the project at staggered times from the summer of 2007 through the winter of 2009. They range in size from 40 to 2,900 employees and serve from 75 to 6,500 people with disabilities. For the demonstration activities, most organizations limited implementation of CDS to specific sections of the curriculum or to specific programs within their agencies.

**Figure 1. Geographic Location of Demonstration Sites**



One of the greatest strengths of CDS is the flexibility of its learner management system. Organizations were encouraged to use CDS in ways that represented a "best fit" within their organizational culture. Each one used CDS in whatever way they determined would best meet their training needs. There were no prescriptive guidelines related to the type, number, or sequencing of CDS courses used by learners within the organizations. Organizations were also encourage to develop recognition and incentive programs for employees who completed the organization's CDS program.

Some learners chose to go beyond the specific sections of the curriculum their organization had designed and completed all the courses in CDS. This indicates that the comprehensive nature of the CDS course menu is important. It allowed organizations to use CDS to meet the needs of their direct support employees without the addition of other courses or training.

Each organization had different training needs and used CDS in different ways to motivate and recognize their direct support employees. Nearly all of the organizations in the demonstration project used CDS with new employees. Some even made its use a requirement of employment for new hires. Using CDS as a training tool for new employees is one benefit of the CDS system. However, it can also be used to provide ongoing learning opportunities for existing and experienced employees.

Table 1 on page 4 provides an overview of the various CDS implementation strategies used by organizations participating in the project.

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Feedback from DSPs has been consistent since participation in CDS began, in that it makes them better, more effective staff and is a positive experience. Staff feel being a graduate of CDS gives them status and recognition they previously hadn't enjoyed in the field.

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**Table 1. North Carolina College of Direct Support Implementation Strategies**

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**Used CDS to meet mandatory requirements for training of their DSPs.**

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**Modified their existing training program, replacing much of the previous classroom training with CDS courses.** For example, they modified or discontinued training on topics such as documentation, safety, and cultural competency. These were replaced with CDS course content.

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**Made the on-the-job skill development checklists, that are part of CDS lessons, available for incorporation into DSP supervision across the organization.** This greatly enhanced supervision of DSPs and provided solid guidance to improve and direct staff development activities. Through use of the on-the-job-training (OJT) prompts, supervisors were able to link online learning to increasing the support skills of staff.

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**Paired CDS curriculum with the North Carolina WIN Program (Workforce Investment Network) to create a successful program. Enabled the provider to send over 140 graduates of CDS back to school to earn GEDs, certifications, and associate's degrees.** This organization provided a match for the education expenses of their staff. This helped staff to obtain additional education and improve their own financial situations, as well as those of their communities. It helped the agency to fill hard-to-recruit positions and helped increase staff morale. For example, some staff employed by the organization have now completed CDS and gone on to become nurses or entered other professions.

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**Created a structure and system for peer mentoring.** New staff who take CDS courses are assigned to a mentor who has already completed the program. The mentor supports the new employee as he or she begins their CDS journey and prepares for new experiences in his or her work life.

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**Used CDS initially to train supervisors so that they could become familiar with the content of the curriculum, how the learning system operates, and the amount of time required to complete the lessons.**

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**Used CDS to give direct support employees an opportunity they had never had.** One organization came up with a unique, celebratory way of implementing CDS. They developed and implemented the concept of a "CDS Kick-Off". All employees can apply to be a part of the CDS training program. If an employee is accepted, he or she can attend a kick-off to learn about CDS and how to use it. Employees accepted into the program have six months to complete all the modules and have the opportunity to attend a graduation ceremony after passing their training program. Once they graduate, they receive a diploma, recognition from the organization, and a salary increase.

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## What Were the Outcomes Experienced by Individual College of Direct Support Learners?

During this demonstration project, direct support learners and supervisors completed 158,108 hours of CDS training — an average of 82 hours per learner. This outcome is significant, given the number of hours per participant and what it would cost an organization to send employees to 82 hours of training. They also spent additional hours in other learning environments, such as discussion sessions and mentoring with supervisors and peers.

Comprehension and learning was measured and documented through the pre- and post-test capacity of CDS. Based on pre- and post-test scores, learners improved their knowledge an average of 24.5%. The improvement ranged from 24% to 27.2%, depending on the course completed by the learner. Detailed information on learner test performance is presented in Table 2 on page 6.

In addition to performance on tests, many organizations reported observable changes in performance on the job. One organization shared a story about how a CDS learner had used content learned in the *Safety at Home and in the Community* course to improve safety practices within the organization. In another instance, a learner completed the *Cultural Competence* course. The course helped the learner to recognize that the individual he served had grown up speaking Spanish. However, most of the support staff regularly communicated with this person in English. The learner then went on to learn Spanish in order to serve this individual in a more culturally appropriate manner.

These anecdotes underscore the fact that although each module has many opportunities for learning that may not be part of the overall goal, they can still provide a significant benefit for the individual learner and the person he or she supports.

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Several staff stated that before CDS they only had a GED or high school diploma, but now they felt like their skills were recognized and appreciated publicly for the first time. They also expressed pride in that they had completed a nationally recognized course of study.

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**Table 2. CDS Course Test Scores From July 2007 to February 28, 2009 in North Carolina**

<b>College of Frontline Supervision and Management</b>		<b>Average pre-test %</b>	<b>Average post-test %</b>	<b>% Change in test scores</b>
1	Developing an Intervention Plan	68.9	95.1	26.2
2	Fueling High Performance	68.1	95.3	27.2
4	Recruitment and Selection	68.5	94.8	26.3
5	Training and Orientation	69.7	94.8	25.1
<b>College of Direct Support</b>		<b>Average pre-test %</b>	<b>Average post-test %</b>	<b>% Change in test scores</b>
6	Civil Rights and Advocacy	69.5	95.0	25.5
7	Community Inclusion	69.7	95.1	25.4
8	Cultural Competence	70.1	95.3	25.2
9	Direct Support Professionalism	70.0	95.3	25.3
10	Documentation	70.3	95.1	24.9
11	Employment Supports for People with Disabilities	70.0	95.4	25.4
12	Everyone Can Communicate	71.1	95.0	24.0
13	Functional Assessment	69.1	95.1	25.9
14	Individual Rights and Choice	69.5	95.2	25.7
15	Introduction to Developmental Disabilities	69.4	95.1	25.8
16	Introduction to Medication Support	69.6	95.2	25.6
17	Maltreatment of Vulnerable Adults and Children	69.7	95.3	25.7
18	Person-Centered Planning: Introduction	69.4	95.3	26.0
19	Personal Care	69.6	95.2	25.6
20	Positive Behavior Supports	69.9	95.3	25.4
21	Safety at Home and in the Community	69.1	95.4	26.3
22	Supporting Healthy Lives	69.6	95.4	25.8
23	Teaching People with Developmental Disabilities	69.5	95.3	25.8
24	Working with Families and Support Networks	68.5	95.3	26.8
25	You've Got a Friend	70.7	95.4	24.7
<b>Disability Intensive Courses</b>		<b>Average pre-test %</b>	<b>Average post-test %</b>	<b>% Change in test scores</b>
26	Autism	69.8	94.6	24.8
27	Cerebral Palsy	71.1	94.5	23.4
<b>Averages Across All Courses</b>		<b>67.1</b>	<b>91.2</b>	<b>24.5</b>

## What Were the Organizational Outcomes Experienced by the Agencies in the Project?

The agencies involved in the project experienced a number of positive organizational outcomes. Changes occurred in training practices, recognition and incentive programs, and turnover. In general, agencies that started with the project earlier and those with greater size and resources experienced greater change. It is important to note that there is no way to establish cause and effect in this demonstration project. Though the changes within these organizations are not solely attributable to implementation of CDS, CDS contributed significantly to these changes.

### Training Practices

Each organization in this demonstration project delivered training to its employees in new or different ways. Some allowed the learning to occur anytime and anywhere on computers of the learner's choice. Others developed learning labs at their organizations and designated computers for training purposes. One organization collaborated with the local library to access computers and to teach learners how to use them. All of the organizations had concerns about whether or not their workforce could actually use a computer to learn. This presented an opportunity for learners to achieve skill-based training in computer literacy. This was not an expected outcome.

Some of the organizations used CDS to train new employees, some used it to train long-term employees, and others used it to train both. Nearly all of the organizations trained both DSPs and supervisors or managers using CDS.

Organizations reported that CDS was flexible and easy to use. Learners indicated that the content was more comprehensive than the curriculum they had used previously and that it was relevant to their day-to-day work and responsibilities. Many organizations reported that its content and assessment tools challenged even their most experienced staff. CDS uses a method of instruction that reinforces learning through the use of voice clips, video clips, and interactive exercises. On-the-job training skills and portfolio development enhance the learning process. This made CDS user-friendly but also challenging to all levels of staff that participated in the project.

### Recognition and Incentive Practices

Organizations also used CDS to enhance or create recognition and incentive programs. Some of the organizations created new recognition programs by having DSPs complete a required series of CDS courses within a specific timeframe. When the courses were completed, the employees were recognized in a variety of ways, including celebration and graduation events, receiving diplomas or certificates (which included National Direct Support Credentials), and, in some cases, wage increases. Others used CDS as a tool or resource to recognize and provide new opportunities for long-term employees

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As a result of CDS one of my staff is restructuring the safety training program at our location. She is now involved in mentoring new staff and reinforcing the importance of following safety standards at the program location and in the community.

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or to encourage employees to take advantage of education incentive programs. In many organizations, CDS served as an informal means for DSPs to come together and learn together. This helped them to feel valued and respected, and to see themselves as a significant component of organizational success. Kick-off, networking, and celebration events took place at many of the demonstration sites. This brought DSPs together and allowed for further collaboration. CEOs, directors, and owners were involved in some of the recognition and graduation ceremonies. This lent even more credibility to the importance of the training.

### **Turnover**

For the purpose of this evaluation, turnover was calculated by identifying the crude separation rate of direct support employees. This is the total number of DSPs that left the organization divided by the total number of current employees, plus the current vacancy rate multiplied

by 100. There were two calculation periods used to identify turnover. The first was the twelve months preceding CDS implementation. The second was the longest period post-CDS implementation based on the length of time the organizations had used CDS. Calculating the turnover rate based on the number of months post-CDS implementation was important because not all of the organizations started using CDS at the same time.

If the organization had not implemented CDS for a period of at least 14 months, their data were not included in this report. Four organizations had a 24-month implementation period, one had an 18-month implementation period, and two had a 14- or 15-month implementation period. Two organizations that participated in the demonstration project had been implementing the curriculum for less than 6 months when the project ended. Their data were not included in the organizational outcomes.

For the seven organizations included in the evaluation, at the time of baseline, turnover rates ranged from 16% to 42%. Post-implementation turnover rates ranged from 9.5% to 41%. It is important to note that these turnover rates are lower than national averages: 42% for multi-service organizations and 50% for residential services supporting people with intellectual and developmental disabilities (The Lewin Group, 2008). One possible explanation for this is that the organizations participating in this demonstration project were highly motivated and already had programs and strategies in place to address retention.

Changes in turnover for the post-implementation period ranged from +5% to -12.3% across these same organizations. In all but one organization, there was a decrease in turnover. The average reduction in turnover across these seven organizations was 6.9%. This reduction in turnover can be significant, depending on the size of the organization. It results in the ability of an organization to use resources differently to support their employees rather than pay for the cost of training new employees.

Another important finding relates to the direct support workers that were hired by the organization but left within six months. The early turnover for the organizations in this study, post-CDS intervention, ranged from 0% to 19%. Previous studies conducted in other states have found the percentage of employees who leave before being employed for six months in a given

year is 68% (Hewitt & Larson, 2007). Typically, a low percentage of early leavers can indicate several key things. It indicates that the organization is doing a good job of letting new hires know about their job roles and responsibilities. It also indicates that they are orienting and supporting their new hires. Several organizations in this demonstration project indicated that one of the benefits of using CDS was that it helped their DSPs to better understand and perform their jobs. They also reported that CDS helped their employees to recognize and identify with the profession of direct support.

A number of reported factors are likely to have contributed to the turnover rate within organizations during the course of the demonstration project —

- DSP hours were reduced due to severe budget cuts and deficits.
- Services and programs that were eliminated due to severe budget cuts and related downsizing.
- Employees who retired.
- Employees who found a better-paying job in a completely different field.
- Families that were relocated to different communities.
- DSPs who moved to another organization for a promotion or professional advancement.

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Our direct support professionals had known since coming into this field that it was challenging and rewarding, but CDS demonstrated that other people knew and appreciated that this wasn't just a job, but a career.

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### Retention

Having strong, well-informed, and skilled supervisors is critical to retaining DSPs. Nearly every study that has been conducted on direct support staff turnover has indicated that DSPs often leave their jobs due to lack of or poor supervision. Within the organizations participating in this demonstration project, frontline supervisor turnover is quite low compared to national averages (30%). Supervisor turnover ranged from 3% to 37% and averaged 18% by the end of the project. Many of the organizations in this demonstration project had frontline supervisors complete CDS training first. They involved frontline supervisors in observing on-the-job employee skills related to CDS content and providing feedback. They then used these supervisors as mentors for their new employees. All of these factors are related to the retention of frontline supervisors. In addition, they probably contributed to the overall success of CDS programs within each participating organization.

Each organization that used CDS was asked to share factors that

contributed to their ability to retain staff. Many ideas were generated, including —

- CDS is a good resource that a DSP can reference at any time if he or she has forgotten information and needs a refresher. An example of this might be how to brush dentures.
- CDS gives DSPs a broader perspective on the field of community human services and supports for people with disabilities. It helps them to see that they are a part of a civil rights and social justice movement.
- CDS provides strategies to help staff cope with the pressures of the job so they can provide better supports to the people receiving services.
- CDS is used as a gateway to further education and career paths within the organization. It gives DSPs a way to advance in their careers.
- CDS is designed to be flexible. This helps many employees who are single parents to fit critical training into their busy lives.
- CDS was made available to all direct support staff in the organization. They were given the opportunity to

complete the training on a rotating basis during work hours. This gave credence to the value of the training and the employee felt valued.

- CDS provides leadership opportunities for DSPs, allowing them to become mentors, trainers, and supporters of new employees who are getting ready to start a new job or using CDS.
- CDS provides a concrete, fair, and measurable means to identify training requirements, needs, and timelines. It also provides an avenue for wage incentives to those that complete their CDS training program as designed and required.

For the purpose of this evaluation, data were also collected regarding employee retention by CDS program completers and non-completers. This was done within the three largest participating organizations. The data were difficult for organizations to obtain because their information and human resource management systems did not allow for reporting of the data. Therefore, random samples of 30 CDS completers and 30 CDS non-completers were obtained from the three largest organizations. On average, employees that completed CDS had higher retention rates than non-completers. The data indicate 97 total months of employment for completers verses 44 months of employment for non-completers. There are two important considerations associated with this finding. First, CDS is probably important for long-term workers. Often, existing staff have few opportunities to improve their skills and obtain training. Organizations within this demonstration

project reported that many existing staff participated in this demonstration. Secondly, it strongly indicates that if a worker can get through a prescribed training program using CDS, he or she may very well stay longer with the organization. This may be due to the fact that workers have the opportunity to develop new skills and are also recognized for completion of training.

### Cost-Effectiveness

Previous studies on the cost of hiring new employees to work as DSPs in community organizations, both nationally and in other states, have yielded cost estimates of \$2,400 for each new hire (Larson & Hewitt, 2005). Using these national estimates of the costs of hiring new employees, the total cost savings from turnover alone across the organizations in this demonstration is estimated at \$283,200 — an average of \$56,640 per agency. These cost savings from turnover may have allowed the organizations to cost-shift resources to other workforce retention strategies or may have helped them pay direct support staff to take the additional hours of CDS training. It may also have allowed development of their recognition and incentive programs.

Another way to think about the cost effectiveness of CDS is to look at the cost of the curriculum investment, the total number of learners engaged in the training program, and the number of completed hours of training. For this demonstration project, the total investment from the North Carolina Council on Developmental Disabilities was \$266,667; the total number of learners was 2,689; and the total number of completed hours of training

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“The turnover rate at the time of implementation was 42% across our whole organization. After implementation of CDS and the WIN program, our turnover was reduced to 8% within the demonstration sites and 26% across our whole organization. While it is difficult to say that these changes were caused by the implementation of CDS, it is clear to us that CDS played a significant role. The estimated cost savings to our organization as a result of reduced turnover was \$564,500\*”

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\* This figure is based on the organization's internal calculations, which were different from the research design calculations in the demonstration project.



was 158,108. This comes out to an average cost of \$99.17 per learner and \$1.69 invested per completed hour of training.

A return-on-investment study was not feasible for this evaluation due to the cost and design of the demonstration project.

## Challenges and Barriers

### Getting Started

From the time this demonstration project started, it took approximately six months for participants to begin implementing CDS. This six-month period included creation of the customized annotations and time to train the administrators. Agencies also had staggered start times. Each organization had to design or redesign training programs in order to effectively use CDS. The time was spent in workgroups and planning sessions, and going through and understanding the CDS content. During

this time, few organizations and their learners were actually using CDS. Some of the organizations had more resources and were able to implement the training with more consistency. These organizations provided best-practice tools and guidance to those organizations with less staff, resources, or time.

### Networking and Collaboration

Administrators for each organization met each quarter to share how they used and designed CDS. They also discussed reporting requirements in the administration and management of the grant. Organizations were also busy with other initiatives and many had limited time to commit to the program. As a result of these quarterly meetings, a system was set up to provide peer support among the administrators. Some of the more seasoned administrators provided input and materials to those who did not have the staff or resources to commit

to CDS more fully. Several ideas and initiatives were shared at each meeting to encourage best practices and to solve implementation issues. The demonstration project in North Carolina is unique in that it was conducted by a leading provider association. This gave credibility to the project. It was provider-driven and therefore embraced by providers. It showed the necessary steps that must be taken to provide adequate, relevant training to the direct support workforce within the long-term services and supports industry.

### Statewide Implementation and Approval

This project was made available to members of the North Carolina Providers Council. The Council developed customized annotations to assure that CDS courses met state standards and requirements. At this time, the CDS curriculum has not been approved for statewide use. The project did make CDS available to non-council member organizations

on a limited basis. However, the lack of state approval may limit provider organizations willingness to replace some of their existing training with CDS courses on a permanent basis.

### Ongoing Funding and Support

The current economic challenges in the state of North Carolina make it difficult to find resources that will sustain CDS for the organizations in the demonstration project. It also limits the expansion of CDS to providers on a statewide level. The North Carolina Providers Council and its participating agencies, as well as the North Carolina Council on Developmental Disabilities, have promoted CDS at various levels of government. Though there is significant interest in the curriculum from providers and advocates in North Carolina, the commitment of resources to continue CDS and to enhance the program has not yet been realized. The outcomes of this demonstration certainly indicate the utility of CDS and enthusiasm for its continued use if funding were to be

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Empowerment!

We strive for empowerment for the people we serve and now with CDS we can give that same empowerment to our employees.

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secured. However, without a collective purchase of CDS and a system of support for implementation of the curriculum, it is difficult for its use to be sustained.

### Recommendations

These recommendations are intended to identify the needed activities to ensure the long term implementation and use of CDS throughout North Carolina moving into the future. While some of these recommendations might be achieved within a one- or two-year period, others will take longer for full implementation. Recommendations include —

- Organizations that participated in this demonstration project should be encouraged and invited to present their experiences and outcomes at statewide conferences. Efforts should be made to share the positive outcomes of the demonstration project with policymakers and to discuss the importance of adopting CDS statewide.
- The collaborative and group purchasing options of CDS should be explored to ensure statewide access.
- Further learning and demonstration should take place. Access to CDS should be expanded to include additional private and public providers. The expanded demonstration should include training on how to maximize the use of the learner management system. It should also include how to bring customized organizational and state training products into the CDS learning environment as assignable lessons.
- The CDS competencies and learning objectives should be aligned with the statewide cross-sector competencies being developed by the state of North Carolina. Similarities, overlap, and compatibility should be identified.

- A document that identifies how CDS courses and learning objectives meet state requirements should be developed. This document will be critical to ensure that the CDS curriculum gains state approval.
- Further evaluation of the use of CDS should be pursued. This includes conducting a comprehensive return-on-investment study. This study should include consumer outcomes in the areas of inclusion, employment, rights, and choices when DSPs are trained using CDS.

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