

STATE PLAN FOR INDEPENDENT LIVING (SPIL)

Chapter 1, Title VII of the Rehabilitation Act of 1973, as Amended

**STATE INDEPENDENT LIVING SERVICES (SILS) PROGRAM
PART B
CENTERS FOR INDEPENDENT LIVING (CIL) PROGRAM
PART C
FISCAL YEARS 2008 -2010**

Effective Date: October 1, 2007

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PART I: Assurances

Section 1: Legal Basis and Certifications

- 1.1 The designated State unit (DSU) eligible to submit the State Plan for Independent Living (SPIL or the plan) and authorized under State law to perform the functions of the State under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs is the Division of Vocational Rehabilitation (VR).
34 CFR 76.104(a)(1) and (2); 34 CFR 364.22(a)
- 1.2 The separate State agency eligible to submit the plan and authorized under State law to provide vocational rehabilitation (VR) services to individuals who are blind is the Division for the Blind and Visually Impaired (DBVI).
34 CFR 76.104(a)(1) and (2); 34 CFR 364.20(d) and 364.22(c)
- 1.3 The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State is the Vermont Statewide Independent Living Council.
34 CFR 364.21(a)
- 1.4 The DSU and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the SPIL.
34 CFR 76.104(a)(7); 34 CFR 364.20(c) and (d)
- 1.5 The DSU, and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, may legally carry out each provision of the plan and will comply with all applicable Federal statutes and regulations in effect with respect to the three-year period it receives funding under the SPIL.
34 CFR 76.104; 34 CFR 80.11(c)
- 1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law.
34 CFR 76.104(a)(4) and (8)
- 1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is Diane Dalmasse, Director – Division of Vocational Rehabilitation and Fred Jones, Director – Division for the Blind and Visually Impaired.
34 CFR 76.104(a)(5) and (6)

Section 2: SPIL Development

2.1 The plan shall be reviewed and revised not less than once every three years, to ensure the existence of appropriate planning, financial support and coordination, and other assistance to appropriately address, on a statewide and comprehensive basis, the needs in the State for:

- The provision of State independent living services;
- The development and support of a statewide network of centers for independent living; and
- Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities.

34 CFR 364.20(f)

2.2 The DSU and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan.

34 CFR 364.20(g)(1)

2.3 The DSU and SILC establish and maintain a written description of procedures for conducting public meetings in accordance with the following requirements. The DSU and SILC shall provide:

- appropriate and sufficient notice of the public meetings (that is, at least 30 days prior to the public meeting through various media available to the general public, such as newspapers and public service announcements, and through specific contacts with appropriate constituency groups and organizations identified by the DSU and SILC);
- reasonable accommodation to individuals with disabilities who rely on alternative modes of communication in the conduct of the public meetings, including providing sign language interpreters and audio-loops; and
- public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication.

34 CFR 364.20(g)(2)

2.4 At the public meetings to develop the State plan, the DSU and SILC identify those provisions in the SPIL that are State-imposed requirements beyond what would be required to comply with the regulations in 34 CFR parts 364, 365, 366, and 367.

34 CFR 364.20(h)

2.5 The DSU will seek to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under a project funded under chapter 2 of title VII of the Act and that the DSU determines to be effective. *34 CFR 364.28*

2.6 The DSU and SILC actively consult, as appropriate, in the development of the State plan with the director of the Client Assistance Program (CAP) authorized under section 112 of the Act. *34 CFR 364.20(e)*

Section 3: Independent Living Services

3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State; or other funds.

34 CFR 364.43(b)

3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary.

34 CFR 364.43(c)

3.3 All service providers will use formats that are accessible to notify individuals seeking or receiving IL services under chapter 1 of title VII about:

- the availability of the CAP authorized by section 112 of the Act;
- the purposes of the services provided under the CAP; and
- how to contact the CAP.

34 CFR 364.30

3.4 Participating service providers meet all applicable State licensure or certification requirements.

34 CFR 365.31(c)

Section 4: Eligibility

4.1 Any individual with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and CIL programs authorized under chapter 1 of title VII of the Act. Any individual may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate. The determination of an individual's eligibility for IL services under the SILS and CIL programs meets the requirements of 34 CFR 364.51. *34 CFR 364.40(a), (b) and (c)*

4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services. *34 CFR 364.41(a)*

4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services. *34 CFR 364.41(b)*

Section 5: Staffing Requirements

- 5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. *34 CFR 364.23(a)*
- 5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:
- with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille or audio tapes, and who apply for or receive IL services under title VII of the Act; and
 - in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act. *34 CFR 364.23(b)*
- 5.3 Service providers establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development programs emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy. *34 CFR 364.24*
- 5.4 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will take affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act. *34 CFR 364.31*

Section 6: Fiscal Control and Fund Accounting

- 6.1 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will comply with applicable EDGAR fiscal and accounting requirements and will adopt those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for those funds. *34 CFR 364.34*

Section 7: Recordkeeping, Access and Reporting

7.1 In addition to complying with applicable EDGAR recordkeeping requirements, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain records that fully disclose and document:

- the amount and disposition by the recipient of that financial assistance;
- The total cost of the project or undertaking in connection with which the financial assistance is given or used;
- the amount of that portion of the cost of the project or undertaking supplied by other sources;
- compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
- other information that the Commissioner determines to be appropriate to facilitate an effective audit.

34 CFR 364.35(a) and (b)

7.2 With respect to the records that are required by 34 CFR 364.35, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate. *34 CFR 364.36*

7.3 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will provide access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, to the records listed in 34 CFR 364.37 for the purpose of conducting audits, examinations, and compliance reviews. *34 CFR 364.37*

Section 8: Protection, Use, and Release of Personal Information

8.1 Each service provider will adopt and implement policies and procedures to safeguard the confidentiality of all personal information, including photographs and lists of names in accordance with the requirements of 34 CFR 364.56(a)(1-6). *34 CFR 364.56(a)*

Section 9: Signatures

After having carefully reviewed all of the assurances in sections 1 - 8 of this SPIL, the undersigned hereby affirm that the State of Vermont is in compliance and will remain in compliance with the aforementioned assurances during fiscal years 2008-2010.

The effective date of this SPIL is October 1, 2007

SIGNATURE OF SILC CHAIRPERSON

DATE

Harriet Hall

NAME OF SILC CHAIRPERSON

SIGNATURE OF DSU DIRECTOR

DATE

Diane Dalmasse

NAME AND TITLE OF DSU DIRECTOR

SIGNATURE OF DIRECTOR OF THE SEPARATE
STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

DATE

Fred Jones

NAME AND TITLE OF THE DIRECTOR OF THE
SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

Part II: Narrative

Section 1: Goals, Objectives and Activities

1.1 Goals and Mission – 34 CFR 364.42(b)(1)

Description of the overall goals and mission of the State's IL programs and services:

The mission of the Vermont Statewide Independent Living Council is to advance the equality with which people with disabilities enjoy, participate in, and contribute to the lives of their communities, families, and friends. SILC goals include increased public awareness and addressing systems barriers to Independent Living; development, support and delivery of Independent Living services; development of services to underserved areas; leadership development; and general education initiatives relative to disability issues and Independent Living.

The mission of the Vermont Center for Independent Living (VCIL) is to work to promote the dignity, independence, and civil rights of people in Vermont with disabilities. VCIL is committed to cross-disability services, the promotion of active citizenship, and working with others to create services that support self-determination and full participation in community life. Founded in 1979, VCIL is a statewide, non-profit organization directed and staffed by individuals with disabilities. Their goal is to effectively provide the following four core services: information and referral, peer advocacy and community outreach, individual and group skills training, and systems advocacy.

DBVI's mission is to support the efforts of people in Vermont who are blind and visually impaired to achieve or sustain their economic independence, self reliance, and social integration to a level consistent with their interests, abilities and informed choices. Their goal is to effectively provide the following four core services: information and referral, peer advocacy and community outreach, individual and group skills training, and systems advocacy.

1.2 Objectives – 34 CFR 364.42(a)(1) and (d); 34 CFR 364.32; 34 CFR 364.33

1.2A Objectives to be achieved and the time frame for achieving them:

- **Objective #1:** Public Awareness – The SILC recognizes the need for better public awareness regarding Independent Living issues and will continuously strive to educate the public. There will be ongoing efforts to develop conscious support for the Independent Living philosophy.
 - SILC Council members, VCIL staff & board members and DBVI staff will strive to maximize participation with allied disability groups, task forces and coalitions focused on the advancement of the Independent Living movement in Vermont.
Timeline: Ongoing
 - The SILC will maintain a database of media contacts and distribute information statewide through public service announcements and press releases.
Timeline: Ongoing
 - There will be collaborative support from the SILC, VCIL, VR and DBVI at appropriate public events that address disability issues. The SILC will participate annually on the planning committee for the State Disability Awareness Day and will include financial support as a part of the annual resource plan. The SILC advocacy committee will consider involvement in other events that promote the Independent Living philosophy.
Timeline: Ongoing
 - The SILC will maintain a website offering general information, the State Plan for Independent Living, public meeting schedules, and links to other pertinent information related to the Independent Living movement in Vermont and nationally.
Timeline: Ongoing
- **Objective #2:** The SILC acknowledges and respects the Olmstead Plan developed by the Olmstead Commission in 2005 and will strive to advance the implementation of the plan.
 - Community integration will be an ongoing oversight responsibility assigned to the SILC advocacy committee. The committee will communicate and collaborate at least two times per year with VCIL and other appropriate organizations and agencies to assess the monitoring and progress of the Olmstead Plan. The SILC and VCIL will send a collaborative correspondence to the Governor once per year with a general assessment of nursing home transition and issues relating to people with disabilities living in their most integrated and preferred community setting.
Timeline: Ongoing /Annual
 - The SILC acknowledges that affordable and accessible housing is significantly lacking in

Vermont. The council commits to maintaining awareness with regard to the status of affordable housing through collaboration and communication with VCIL and other related organizations and State agencies. There will be a focus discussion on housing at a SILC quarterly meeting at least once every year. The SILC will commit to a specific public awareness outreach strategy based on the discussion.

Timeline: Ongoing / Annually

- Transportation continues to be a critical barrier for many people with disabilities in Vermont. The SILC commits to maintaining awareness with regard to the status of accessible transportation through collaboration and communication with VCIL and other related organizations and State boards and agencies. There will be a focus discussion on transportation at a SILC quarterly meeting at least once every year. The SILC will commit to a specific public awareness outreach strategy based on the discussion.

Timeline: Ongoing / Annually

- The SILC has serious concerns with regard to the State Corrections System relative to the needs of people with disabilities. In an effort to support appropriate and necessary transition services and prevention efforts, the SILC will identify key partners such as Vermont Protection and Advocacy. Through the work of the SILC advocacy committee, awareness efforts will be defined, including a focus on contact with the court system.

Timeline: Ongoing

- The SILC will advocate collaboratively with the VCIL, GCEPD, VR & the SRC for policies that will seek to identify and remove barriers to employment for persons with disabilities as by enhancing work incentives available to them.

- **Objective #3:** The SILC, in collaboration with VCIL, will advocate for public policy and programs that support Independent Living needs for people with disabilities in Vermont. Advocacy will be addressed at local, State and national levels.

- The SILC, per the bylaws, will maintain an active advocacy committee that meets regularly throughout the year to assess disability issues that need consumer representation.

Timeline: Ongoing

- The SILC will maintain ex-officio membership in the Vermont Coalition for Disability Rights (VCDR) and participate actively in that organization through representation on its legislative committee and Board of Governors.

Timeline: Ongoing

- SILC members will take the initiative to be as informed as possible regarding disability issues and the Independent Living movement through organizational releases, the media and State and national resources.

Timeline: Ongoing

- The SILC and VCIL will comment formally and informally, as appropriate, on Independent Living issues related to legislation, regulations, and disability policy with a focus on the removal of barriers.
Timeline: Ongoing
- **Objective #4:** The SILC recognizes the critical importance of leadership development for both youth and adults with disabilities. This will be addressed through training, peer mentor programs, collaboration and advocacy.
 - The SILC advocacy committee will be responsible for the oversight of SILC leadership development initiatives. With input from VCIL and other appropriate organizations or State agencies, the committee will strive to understand the status and direction of leadership development relative to the Independent Living movement in Vermont and nationally. The committee will assess effective strategies and/or potential practices that will promote leadership development.
Timeline: Ongoing / The committee will meet a minimum of six times per year.
 - The SILC executive committee will be responsible for offering an annual new member orientation and Independent Living movement history review to both existing and pending SILC members.
Timeline: Annual
 - Members of the SILC and VCIL will strive collaboratively to increase peer mentorship opportunities for people with disabilities. Leadership development will be a focus at a SILC quarterly meeting at least one time per year.
Timeline: Annual
 - The SILC considers the annual NCIL Conference, SILC Congress and the APRIL conference to be priority opportunities for leadership development and organizational networking. The SILC will assess resources available on an annual basis and strive to budget for at least two people to attend each conference. The Council will consider youth advocates with disabilities when selecting representatives for conferences.
Timeline: Annual
- **Objective #5:** The SILC considers its education initiatives to be a priority. With the development of the first edition of the PRIDE curriculum (Promoting Respect and Inclusion through Disabilities Studies Education) the objective for the next three years is to strive for statewide classroom implementation.
 - The SILC education initiative workgroup will be responsible for developing an annual action plan at the beginning of each fiscal year. The plan will be completed and ready for implementation by November 15 of the respective fiscal year.

Timeline: Annual

- There will be a plan and strategy for cultivating collaborative efforts towards the development of courses for teachers in bringing the PRIDE curriculum implementation to the classroom. This will be assessed annually.

Timeline: Annual

- Presentations of the PRIDE curriculum at State and National conferences or events is recognized as an important avenue for development and distribution. The SILC will respect this priority, plan and budget appropriately for these activities.

Timeline: Ongoing

- The SILC will consider the education initiative as a funding priority, and will consider additional funding sources that may support the implementation of the PRIDE curriculum.

Timeline: Ongoing

- **Objective #6:** The importance of emergency preparedness for people with disabilities has become increasingly more apparent with the magnitude of natural disasters in recent years. The SILC will collaborate with VCIL, DBVI and DDAIL to ensure that emergency systems and disaster plans are in place and offer full consideration to the civil rights of people with disabilities.

- The State Office of Emergency Management, AHS, VCIL and other disability and Deaf organizations are involved in activities to improve the accessibility and effectiveness of emergency planning systems. VCIL has committed to a continuation of activities and training regarding coordination and technical assistance. The SILC will work with VCIL and the DSUs to promote best practices in emergency management by the state of Vermont and Vermont municipalities.

Timeline: Ongoing

- Every individual member of the SILC will be responsible for developing and maintaining their own personal emergency / disaster plan. These plans will be completed by appointed council members by the end of FY08. New members appointed after 10/01/07 will be expected to complete their personal plan within six months of receiving their notice of appointment.

Timeline: Ongoing

- **Objective #7:** Includes the development, support and coordination of Core Independent Living Services for people with disabilities by the Vermont Center for Independent Living (VCIL). This objective promotes a philosophy of independent living and will be a funding priority for the SILC. It reflects a commitment to consumer control, peer support, self-help, self-determination, equal access, individual and systems advocacy. It maximizes leadership, empowerment and independence, and it offers people with significant disabilities a focus on the integration and full inclusion into society.

- VCIL will conduct statewide cross-disability programs offering the following four core services: information and referral, peer advocacy and community outreach, individual and group skills training, systems advocacy. These programs will be in full compliance with standards listed in Title VII, Part C, Section 725 of the Rehabilitation Act.
Timeline: Ongoing
- There will be an ongoing collaborative effort between the SILC and VCIL to advocate with State and Federal Administration officials for legislative and congressional change that will continue and potentially increase fund appropriations. This commitment is relative to State funding and the Federal Title VII Chapter 1 and Chapter 2 funds that support Vermont's Independent Living programs.
Timeline: Ongoing
- The SILC will recommend on an annual basis a funding level for a grant award, to be administered by the DSU to VCIL for the purposes of providing Independent Living services in the State of Vermont.
Timeline: Ongoing
- **Objective #8:** The Vermont Division for the Blind and Visually Impaired (DBVI) operates statewide Independent Living programs addressing the four core service areas and is directly serving people who are blind and visually impaired. Core service areas are as follows: information and referral, Independent Living skills training, counseling (including peer counseling), individual and systems advocacy. These services are provided through DBVI operations in addition to contracting with the Vermont Association for the Blind and Visually Impaired (VABVI).
 - DBVI, through its four regionally-based rehabilitation associates, will continue to provide information and referral services related to life skills training. This will include mobility training, transportation, physical rehabilitation, adaptive aids and appliances, benefit programs such as Medicaid, Medicare, Social Security, Veterans' Benefits, personal assistance, and Children with Special Health Needs. Community resources such as VABVI, Councils on Aging, VCIL, support groups, the Developmental Disabilities Law Program, etc., will be utilized.
Timeline: Ongoing
 - DBVI, through contract with VABVI, will provide orientation and mobility services in and outside the home; training in using low vision, self-care, performing activities of daily living, using accessibility aids; and rehabilitation teaching. Also, through a contract with VABVI, skill-building services are specifically targeted to adolescents and young adults such as socialization, self-care, performing activities of daily living, and career awareness. This will be maintained.
Timeline: Ongoing

- Counseling, Including Peer Counseling, will be provided by DBVI, directly or through contracts. Areas of focus will include peer counseling, psychotherapeutic and adjustment counseling, loss/grief counseling, and counseling for substance abuse, short-term crisis, and other issues.
Timeline: Ongoing
- Individual and systems advocacy will be an ongoing priority. DBVI's rehabilitation associates provide advocacy assistance to individual consumers in obtaining services such as Medicaid, Medicare, SSI/SSDI, Veterans' Benefits, housing, assistive technology, medical assistance, etc. DBVI addresses systems advocacy need through collaborative research and demonstrations of new technology and through the identification of new resources for transportation.
Timeline: Ongoing
- DBVI will contract with VABVI to operate a statewide program consistent with the goals and objectives of Title VII, Chapter 2 of the Rehabilitation Act: Independent Living for Older Individuals who are Blind (ILOIB) Program.
Timeline: Ongoing
- **Objective #9:** The autonomy of the SILC is recognized as important operationally as well as being federally mandated. The SILC shall function autonomously.
 - The SILC will periodically assess the option of incorporating as a non-profit organization (as defined under Sect. 501 (c) (3) of the Internal Revenue Code).
Timeline: Annually

1.2B Plans regarding outreach to populations in the State that are unserved or underserved by programs under title VII, including minority groups and urban and rural populations.

Vermont's Independent Living programs will strive to be increasingly responsive to the needs of minority populations and underserved disability populations, and geographic areas that are unserved or underserved. There will be a focus on increased service to people who are a part of these groups or residents of the areas identified.

This objective promotes a philosophy of independent living, including a philosophy of consumer control, peer support, self-help, self-determination, equal access, and individual, self, and system advocacy, to maximize the leadership, empowerment, independence, and productivity of individuals with significant disabilities, and their integration and full inclusion.

- The Northeast Kingdom, Springfield/White River and the Rutland areas will be the geographic focus that will be targeted for improved services. The SILC and VCIL will confer annually to determine goals and strategies that can offer improvement to the access and awareness of Independent Living services. The strategic planning will take place within the first two months of each respective fiscal year.
Timeline: Annual
- The SILC advocacy committee will take responsibility for contacting leaders of organizations serving minority populations and underserved disability groups to discuss their independent living goals and service needs. Reports will be provided to the SILC, VCIL and DBVI, and strategies will be discussed and determined in an effort to address needs.
Timeline: Ongoing
- The SILC will require an annual report from all recipients of Part B funds on their outreach to minority populations and underserved disability groups and the results of their efforts.
Timeline: Annually, with 704 report
- The SILC advocacy committee will work to solicit collaborative resources in an effort to support a needs assessment survey and analysis that will identify the disability populations that are underserved in Vermont.
- DBVI in its efforts to reach all Vermonters who might benefit from services for the blind will continue its outreach and education efforts to underserved Vermonters. Two particular areas of effort involve ethnic and racial minority populations and Vermonters who are deaf/blind. DBVI training and education on outreach to minority populations, a very small but growing segment of the Vermont census, involves the IL program and VABVI in its training sessions. DBVI seeks both to identify minority populations in the state and then how to involve these populations in services. The deaf/blind population is a tiny, but very underserved population. In an effort to alleviate some of the incredible isolation felt by these individuals DBVI will support a needs analysis and will

provide support for these individuals to live more independently and to participate more fully in their communities

Timeline: Survey complete by the end FYO9 / Analysis by FY10

1.3 Financial Plan – 34 CFR 364.42(a)(2) and (3); 34 CFR 364.29

Describe in sections 1.3A and 1.3B, below, the financial plan for the use of Federal and non-Federal funds to meet the SPIL objectives.

1.3A Financial Plan Tables

Year 1

| Sources | Approximate Funding Amounts and Uses | | | |
|---|---|-------------------------------------|---------------------------------------|-----------------------|
| | SILC Resource Plan | IL Services | General CIL Operations | Other SPIL Activities |
| Title VII Funds | | | | |
| Chapter 1, Part B | \$86,108 | \$75,369-DBVI | \$140,000-VCIL | |
| Chapter 1, Part C | | | 0 | |
| Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective) | | \$225,000 | | |
| | | | | |
| Other Federal Funds | | | | |
| Sec. 101(a)(18) of the Act (Innovation and Expansion) | 18,500-DBVI | \$250,000 (Global Commitment VABVI) | | |
| Other | | | | |
| | | | | |
| Non-Federal Funds | | | | |
| State Funds | | \$98,958 (GF in OB) | \$56,250 VCIL VR Match on State Grant | |
| Other | | | | |

Year 2

| Sources | Approximate Funding Amounts and Uses | | | |
|--|---|--|--|-----------------------|
| | SILC Resource Plan | IL Services | General CIL Operations | Other SPIL Activities |
| Title VII Funds | | | | |
| Chapter 1, Part B | \$86,108 | \$75,369-DBVI | \$140,000-VCIL | |
| Chapter 1, Part C | | | 0 | |
| Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective) | | \$225,000 | | |
| | | | | |
| Other Federal Funds | | | | |
| Sec. 101(a)(18) of the Act (Innovation and Expansion) | \$18,500-DBVI | \$250,000 (Global Commitment VABVI) | | |
| Other | | | | |
| | | | | |
| Non-Federal Funds | | | | |
| State Funds | | \$98,958 (GF in OB) | \$56,250 VCIL VR Match on State Grant | |
| Other | | | | |

Year 3

| Sources | Approximate Funding Amounts and Uses | | | |
|---|---|-------------------------------------|---------------------------------------|-----------------------|
| | SILC Resource Plan | IL Services | General CIL Operations | Other SPIL Activities |
| Title VII Funds | | | | |
| Chapter 1, Part B | \$86,108 | \$75,369-DBVI | \$140,000-VCIL | |
| Chapter 1, Part C | | | 0 | |
| Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective) | | \$225,000 | | |
| | | | | |
| Other Federal Funds | | | | |
| Sec. 101(a)(18) of the Act (Innovation and Expansion) | \$18,500 | \$250,000 (Global Commitment VABVI) | | |
| Other | | | | |
| | | | | |
| Non-Federal Funds | | | | |
| State Funds | | \$98,958 (GF in OB) | \$56,250 VCIL VR Match on State Grant | |
| Other | | | | |

1.3B Financial Plan Narratives

1.3B(1) Specify how the part B, part C and chapter 2 (Older Blind) funds, if applicable, will further the SPIL objectives.

Part B and Chapter 2 funds will further the SPIL objectives as they are the only source of funding for operations and Independent Living services grants that are awarded to Vermont’s only Center for Independent Living.

1.3B(2) Describe efforts to coordinate Federal and State funding for centers and IL services, including the amounts, sources and purposes of the funding to be coordinated.

The only SILC activities that coordinate Federal and State funding for CILs through the SILC is the SILC contract through which the SILC allocates VCIL services funds and the state Department of Disabilities, Aging and Independent Living and uses as a mechanism to “pass through” \$56, 958 of additional general funds to VCIL. The SILC has also partnered with VCIL on youth leadership costs.

1.3B(3) Describe any in-kind resources including plant, equipment or services to be provided in support of the SILC resource plan, IL services, general CIL operations and/or other SPIL objectives.

N/A

1.3B(4) Provide any additional information about the financial plan, as appropriate.

N/A

1.4 Compatibility with Chapter 1 of Title VII and the CIL Work Plans – 34 CFR 364.42(c) and (e)

1.4A Describe how the SPIL objectives are consistent with and further the purpose of chapter 1 of title VII of the Act as stated in section 701 of the Act and 34 CFR 364.2.

- The State assures that in the implementation of this plan the State will:
- (a) Promote a philosophy of independent living (IL), including a philosophy of consumer control, peer support, self-help, self-determination, equal access, and individual, and system advocacy, to maximize the leadership, empowerment, independence, and productivity of individuals with significant disabilities, and to promote and maximize the integration and full inclusion of individuals with significant disabilities into the mainstream of American society by providing financial assistance to States;
 - (b) Provide financial assistance for providing, expanding, or improving the provision of IL services;
 - (c) Provide assistance to develop and support a Statewide network of centers for independent living (CILs), operated by consumer-controlled, community-based, cross-disability, nonresidential private nonprofit agencies that are operated within local communities by individuals with disabilities and that provide an array of IL services; and
 - (d) Advocate for improving working relationships among the various entities providing services to and for people with significant disabilities.

1.4B Describe how, in developing the SPIL objectives, the DSU and the SILC considered and incorporated, where appropriate, the priorities and objectives established by Centers for Independent Living under section 725(c)(4) of the Act.

There was significant planning and collaboration with the CIL during the planning for and development of the new SPIL and this work is reflected in the proposed plan. The current and proposed advocacy and service activities of the CIL were presented to the full Council for discussion and review. The SILC and VCIL have identified shared priorities in the areas of general disability leadership development and youth leadership initiatives, outreach to underserved populations and regions, provision of independent living services that prevent institutionalization and promote full community participation, and advocacy related to the State Olmstead Plan and other disability rights and service needs. Much of this work is now being followed up on through the SILC committees, through planned presentations at the full Council and through collaborative work with the Vermont Coalition for Disability Rights. In addition the SILC and VCIL will be working together on our shared goal of expanding state and federal funding support for CIL activities.

1.5 Cooperation, Coordination, and Working Relationships Among Various Entities – 34 CFR 364.26

Description of the steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC, and centers; the DSU, other State agencies represented on the SILC and other councils that address the needs of specific disability populations and issues; and other public and private entities determined to be appropriate by the SILC.

Vermont, being a small state, offers tangible opportunities to fostering cooperation, coordination and working relationships that will forward the Independent Living movement. The SILC council will have active representation from the State's only Center for Independent Living, as well as representatives from the Designated State Units. These mandated representatives, along with the DSU's liaison to the SILC will participate in not only the general council meetings, but will also be active with committees and workgroups when appropriate. Representation by SILC members, CIL staff and DSU representatives will be assessed and appointed to a variety of working groups such as the Vermont Coalition for Disability Rights legislative and education committees; the State Rehabilitation Council; the Medicaid Advisory Board; and other task forces that form. There is a strong commitment to a team effort for the purposes of improved opportunities for people with disabilities and increased Independent Living services in Vermont.

1.6 Coordination of Services – 34 CFR 364.27

Describe how IL services funded under chapter 1 of title VII of the Act will be coordinated with and complement other services to avoid unnecessary duplication with other Federal, State, and local programs, including the OIB program authorized by chapter 2 of title VII of the Act, that provide IL- or VR-related services.

- The State takes steps that maximize the communication, cooperation, coordination, and working relationships among -
 - a) the SILS program, the SILC and CILs; and
 - b) the DSU(s), other State agencies represented on the SILC, other councils that address the needs of specific disability populations and issues, and other public and private entities, including Indian Tribal Councils, determined to be appropriate by the SILC.
- The State ensures that services funded under Chapter 1 will complement and be coordinated with other services to avoid unnecessary duplication with other Federal, State, and local programs, including the IL program for older individuals who are blind funded under Chapter 2 of Title VII.
- The State coordinates Federal and State funding for CILs and SILS.

1.7 Independent Living Services for Individuals who are Older Blind – 34 CFR 364.28

How the DSU seeks to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under the Older Individuals who are Blind program and that the DSU determines to be effective.

The Vermont Association for the Blind and Visually Impaired - VABVI is under contract with DBVI to provide services under Title VII, Chapter 2 of the Rehabilitation Act—Independent Living for Older Individuals who are Blind. For the past 15 years, VABVI has conducted the Low Vision and Rehabilitative Services Project, a statewide program offering low vision and rehabilitative services, adjustment counseling, and independent living skills training to visually impaired Vermonters age 55 and older. There has been expansion in this program's capacity to provide optometry services locally and to utilize volunteers in providing services.

VABVI's Information and Referral Service with Statewide Toll-free access provides callers with information regarding assistive technology, rehabilitation and mobility training, benefits programs, civil rights, transportation, health care, personal assistance, community resources, and other topics of interest to blind and visually impaired people in Vermont.

Section 2: Scope, Extent, and Arrangements of Services

2.1 Scope and Extent – 34 CFR 364.42(b)(2)(3); 34 CFR 364.43(b); 34 CFR 364.59(b)

2.1A Check the appropriate boxes in the SPIL Instrument table indicating the types of IL services to be provided to meet the objectives identified in section 1.2 of this SPIL, and whether the services will be provided by the CILs or by the DSU (directly and/or through contract or grant).

| Table 2.1A: Independent living services | Provided by the DSU (directly) | Provided by the DSU (through contract and/or grant) | Provided by the CILs (Not through DSU contracts/grants) |
|--|---------------------------------------|--|--|
| Core Independent Living Services, as follows: | | | |
| Information and referral | X | | X |
| IL skills training | | X | X |
| Peer counseling | | X | X |
| Individual and systems advocacy | X | | X |
| Counseling services, including psychological, psychotherapeutic, and related services | | X | |
| Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with significant disabilities) | X | | X |
| Rehabilitation technology | X | | X |
| Mobility training | | X | |
| Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services | | X | |
| Personal assistance services, including attendant care and the training of personnel providing such services | | X | |
| Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services | X | | X |

| Table 2.1A: Independent living services | Provided by the DSU (directly) | Provided by the DSU (through contract and/or grant) | Provided by the CILs (Not through DSU contracts/grants) |
|--|---------------------------------------|--|--|
| Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act | X | | X |
| Education and training necessary for living in the community and participating in community activities | | X | X |
| Supported living | | | |
| Transportation, including referral and assistance for such transportation | | X | |
| Physical rehabilitation | | X | |
| Therapeutic treatment | | | |
| Provision of needed prostheses and other appliances and devices | | | X |
| Individual and group social and recreational services | X | | X |
| Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options | | X | X |
| Services for children with significant disabilities | | X | X |
| Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities | X | | X |
| Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future | | | X |
| Community awareness programs to enhance the understanding and integration into society of individuals with disabilities | X | | X |
| Other necessary services not inconsistent with the Act | X | X | X |

2.1B Describe any service provision priorities, including types of services or populations, established for meeting the SPIL objectives identified in section 1.2.

Vermont Center for Independent Living

There are a number of populations that are considered a priority for service provision relative to this plan. Targeted outreach to Native Americans and refugee groups is important. As a tie to the focus on to the Olmstead Plan, reaching out to people in nursing homes and working to assure that people are living in their most integrated setting is a priority. Expanding Information and Referral services for people with Developmental Disabilities has a specific focus, as does youth, leadership and transition. Emergency preparedness is written into the SPIL for the first time and defined as a fully collaborative effort. And, underserved geographical areas, especially the Notheast Kingdom, Springfield and the Rutland areas will be considered as priority for outreach development.

VCIL is a statewide center for Independent Living with a central office in Montpelier and satellite offices in Bennington, Brattleboro and Shelburne. Its principal source of funds is Title VII, Part C of the Rehabilitation Act. The SILC's DSU, administers a grant at the recommendation of the SILC that provides additional funding under Title VII, Part B of the Act to conduct systems advocacy activities and to operate a program that helps consumers access assistive technology and personal assistance. VCIL provides the following four core independent living services to individuals and groups of individuals with disabilities:

VCIL maintains an information and referral service that serves all of Vermont and responds to requests for information on disability-related topics and issues. Local information and referral services are also available at VCIL's satellite offices in Brattleboro, Bennington and Shelburne. Knowledgeable resource specialists with good listening and data search abilities provide callers with up-to-date information about resources for Independent Living such as housing, assistive technology, personal assistance, transportation, employment, rights under the Americans with Disabilities Act, health care, and federal and state programs, such as welfare, Medicaid, Social Security, Vocational Rehabilitation, Medicare, etc.

In addition, VCIL has established a comprehensive resource center at its central office that provides information on topics of interest to disabled Vermonters. VCIL's library contains hundreds of books, articles, periodicals, videotapes, audiotapes, and computer disks, as well as resources that can be downloaded from the World Wide Web, DIMENET, and other on-line services.

Independent Living skills training at VCIL trains consumers in IL skills through workshops and facilitated groups at its central office and satellite sites. Topics covered include: managing personal assistance; civil rights and independent living; consumer rights and responsibilities, money management, advocacy skills, and sexuality and relationships. In addition, peer advocate counselors provide individual training to consumers in self-advocacy, accessing community resources, and other skills necessary for maintaining an independent lifestyle. After receiving the training, teams of volunteers assist local businesses and public accommodations in becoming more accessible.

VCIL's peer advocate counselors provide information, support, and training in self-advocacy to persons with disabilities and Deaf people, enabling them to achieve self-help goals and learn skills for

living as independently as possible. The overall mission of the Peer Advocacy Counseling Program is to increase the independence, dignity, and human rights of people with disabilities through information and peer support in dealing with the issues that affect their lives. VCIL has two peer advocacy teams focus on the needs of Deaf and hard-of-hearing persons and on a cross-disability basis. Locally-based peer advocate counselors meet with peers in their homes in communities throughout Vermont and at VCIL's centers in Montpelier, Brattleboro, Bennington and Shelburne. VCIL also offers, in several locations, support groups through which peers assist and empower each other and plan recreational activities.

Advocacy is the centerpiece of VCIL's efforts to achieve systems and community change. In addition to training consumers in strategies for individual advocacy, VCIL conducts a wide range of activities to improve public policy and the delivery of services affecting people with disabilities, particularly in the areas of personal assistance, employment, health care, and transportation. These include:

- Convening and supporting consumer task forces
- Developing an annual Advocacy Agenda
- Conducting a multi-impact public issues campaign for personal assistance
- Informing grassroots advocates of issues and advocacy needs through peer alerts, newsletters, and public presentations
- Conducting legislative and grassroots advocacy supporting state general fund appropriations for programs that enhance the Independent Living options and opportunities for people with disabilities in Vermont
- Conducting legislative, regulatory, and grassroots advocacy to promote consumer protection in managed care.
- Representing consumer interests on policy committees and boards such as: Vermont Architectural Barriers Compliance Board, Vermont Assistive Technology Coordinating Council, Regional Long Term Care Coalitions, the SSI Mandatory Managed Care Advisory Committee, Medicaid Waiver regional teams, regional transportation boards, committees, and councils, and New England and Vermont ADA Technical Assistance Coalitions
- Monitoring and testifying at legislative and regulatory hearings
- Working with members of the Deaf community to increase communication access and the availability of certified ASL interpreters in Vermont
- Conducting non-partisan voter registration and education activities
- Working in coalition with other organizations through the Vermont Coalition for Disability Rights and other cross-disability and single-disability groups.

Other VCIL Services:

VCIL operates four programs that provide consumers with financial and technical assistance in obtaining assistive technology, personal assistance, and home modifications, enabling them to achieve Independent Living goals.

The Part B Program is funded through a grant awarded annually by the United States Department of Education and dispersed by the DSU. Consumers are assisted in developing Independent Living plans, identifying the resources that will meet their needs (assistive technology, personal assistance, transportation, and other goods and services), and purchasing these items from vendors and providers. Program staff also coordinate with vendors, volunteers, and sources of additional funding, materials, and/or labor; maintain quality control, review and update program procedures as needed; and authorize payments to providers.

The Home Access Project (HAP) assists consumers in modifying home entrances and bathrooms to make them more accessible. The HAP coordinator reviews applications for assistance, helps consumers develop plans for access modifications; coordinates with local contractors, volunteers, and sources of additional funding, materials, and/or labor; networks with funding agencies and other providers; and advocates for affordable housing. VCIL has income caps for our Home Access program as required by the primary funding source, the Vermont Housing and Conservation Trust Fund. They provide Home Access information, peer counseling, technical assistance and advocacy assistance to individuals of all ages but provide specific assistance funding within the specific poverty guidelines set by the State.

The Meals on Wheels Program for people under 60 with disabilities. This program helps people with disabilities and chronic conditions who are unable to prepare their own meals and have no one to help with meal preparation. The program assures people at least get one hot meal a day and provides a daily check-in (often the only contact a person has), which provides an opportunity to identify any additional needs. The program is set up to meet nutritional needs in 3 different ways: emergency, short term and long term. Funding is provided through Vermont Department of Disabilities, Aging and Independent Living.

The Sue Williams Freedom Fund, a collaborative funding partnership with the SILC which funds assistive technology and other purchased services that help individuals with disabilities move out of nursing homes or other restrictive setting or increase their independence and community participation.

Division For The Blind And Visually Impaired

DBVI provides comprehensive Independent Living services to Vermonters who are visually impaired, either directly or through contract with the Vermont Association for the Blind and Visually Impaired (VABVI). These services are funded through Title VII, Chapter 1, Part B, and are available to consumers statewide. They include:

DBVI, through its four regionally-based rehabilitation associates, provides information and referral services related to life skills training, mobility training, transportation, physical rehabilitation, adaptive

aids and appliances, benefit programs such as Medicaid, Medicare, Social Security, Veterans' Benefits, personal assistance, and Children with Special Health Needs, and community resources such as VABVI, Councils on Aging, VCIL, support groups, the Developmental Disabilities Law Program, etc.

DBVI, through contract with VABVI, provides orientation and mobility services in and outside the home; training in using low vision, self-care, performing activities of daily living, using accessibility aids; and rehabilitation teaching. Also provided through contract with VABVI are skill-building services specifically targeted to adolescents and young adults such as socialization, self-care, performing activities of daily living, and career awareness.

DBVI provides, directly or through contract, peer counseling, psychotherapeutic and adjustment counseling, loss/grief counseling, and counseling for substance abuse, short-term crisis, and other issues.

DBVI's rehabilitation associates provide advocacy assistance to individual consumers in obtaining services such as Medicaid, Medicare, SSI/SSDI, Veterans' Benefits, housing, assistive technology, medical assistance, etc. DBVI addresses systems advocacy need through collaborative research and demonstrations of new technology and through the identification of new resources for transportation.

DBVI also provides, directly or through contract, the following services:

- Case management;
- Rehabilitation technology assessments: evaluation and recommendations for technical solutions to vision loss;
- Transportation: assistance in obtaining and paying for transportation necessary to achieve independent living goals;
- Physical rehabilitation: assistance in paying for medical services, eyeglasses and contact lenses, medical equipment and supplies, optical aids, hearing evaluation and aids;
- Assistive devices and appliances: assistance in paying for items such as Braille and audible timepieces, calculators, and note-takers, tape recorders, tactile labeling devices, canes, needle-threaders, tactile and large-print telephones, etc;
- Recreational services: participation in group activities; adapted aids such as Braille and large-print games and playing cards;
- Services to family members: information regarding disability, medical awareness training, etc.

2.1C If the State allows service providers to charge consumers for the cost of services or to consider the ability of individual consumers to pay for the cost of IL services, specify the types of IL services for which costs may be charged and for which a financial need test may be applied, and describe how the State will ensure that:

- Any consideration of financial need is applied uniformly so that all individuals who are eligible for IL services are treated equally; and
- Written policies and consumer documentation required by 34 CFR 364.59(d) will be kept by the service provider.

N/A

2.2 Arrangements for State-Provided Services – 34 CFR 364.43(d) and (e)

2.2A If the DSU will provide any of the IL services identified in section 2.1A through grants or contractual arrangements with third parties, describe such arrangements.

VABVI is the primary contracted service provider for services identified in section 2.1A, by the Division for the Blind and Visually Impaired, including a priority focus on orientation and mobility, rehabilitation teaching, peer group support and training in the use of low-vision devices. These contracts are awarded annually.

2.2B If the State contracts with or awards a grant to a center for the general operation of the center, describe how the State will ensure that the determination of an individual's eligibility for services from that center shall be delegated to the center.

The DSU's -- VR and DBVI, the SILC and VCIL will meet to draft a memorandum of understanding that will clarify and assure that the authority for eligibility determination, IL service assessment, plan development and program operations using Part B grant funding administered by the State, are administered by VCIL. This MOU will be completed by January 1, 2008

Section 3: Design for the Statewide Network of Centers

3.1 Existing Network – 34 CFR 364.25

Provide an overview of the existing network of centers, including non-Part C-funded centers that comply with the standards and assurances in section 725 (b) and (c) of the Act, and the geographic areas and populations currently served by the centers.

Currently, Vermont has one CIL that complies with the standards and assurances of Section 725 of the Rehabilitation Act. The Vermont Center for Independent Living, with a central office in Montpelier (central), operates satellite offices in Bennington (southwest), Brattleboro (southeast) and Shelburne (northwest). Field-based peer advocate counselors strive to provide Title VII, Part C services statewide.

3.2 Expansion of Network – 34 CFR 364.25

Describe the design for the further expansion of the network, including identification of the unserved and underserved areas in the State and the order of priority for serving these areas as additional funding becomes available (beyond the required cost-of-living increase).

Vermont is challenged with underserved and unserved areas, in large part due to the rural nature of the state. Achieving the goal of a statewide network of local centers and satellites is an ongoing goal. Historically, Vermont's plan has been to expand local access to services through the creation of additional VCIL satellites. Other desirable and priority sites for satellites offices have been identified as the Northeast Kingdom, Rutland, and Springfield. Funding and resources continue to challenge VCIL's ability to expand. Vermont's Title VII, Part C allocation has not increased since 1992 and without an increase in federal support, expansion of Vermont's statewide network of Centers for Independent Living is challenged.

3.3 Section 723 States Only – 34 CFR 364.39

3.3A If the State follows an order of priorities for allocating funds among centers within a State that is different from what is outlined in 34 CFR 366.22, describe the alternate order of priority that the DSU director and the SILC chair have agreed upon. Indicate N/A if not applicable.

3.3B Describe how the State policies, practices and procedures governing the awarding of grants to centers and the oversight of these centers are consistent with 34 CFR 366.37 and 366.38.

Section 4: Designated State Unit (DSU)

4.1 Administrative Support Services – 34 CFR 364.4; 34 CFR 364.22(b)

4.1A Describe the administrative support services to be provided by the DSU for the SILS (Part B) program and, if the State is a Section 723 State, for the CIL (Part C) program.

The DSU:

- Receives, accounts for, and disburses funds received by the State under Chapter 1 in accordance with the SPIL;
- Provides administrative support services for the part B State IL services (SILS) program and the part C, Chapter. 1, CIL program in a case in which the program is administered by the State under section 723 of the Act;
- Keeps such records and affords such access to such records as the Secretary finds to be necessary with respect to the programs; and
- Submits the SPIL and such additional information or provides such assurances as the Secretary may require with respect to the programs.

4.1B Describe other DSU arrangements for the administration of the IL program, if any.

Not Applicable

Section 5: Statewide Independent Living Council (SILC)

5.1 Resource plan – 34 CFR 364.21(i)

5.1A Describe the resource plan prepared by the SILC in conjunction with the DSU for the provision of resources, including staff and personnel, made available under parts B and C of chapter 1 of title VII, section 101(a)(18) of the Act, and from other public and private sources that may be necessary to carry out the functions of the SILC identified in section 705(c). The description must address the three years of this SPIL.

In conjunction with the DSU, the SILC will prepare a Resource Plan (SILC Budget) for the provision of resources, cash or in-kind, including staff and personnel, rent, supplies, telephone expenses, travel, and other expenses (e.g., child care, personal assistance services, and compensation to a member of the SILC, if the member is not employed or must forfeit wages from other employment, for each day the member is engaged in performing SILC duties) that will be necessary to carry out the functions of the SILC during the term of the SPIL.

The SILC operates with one contracted executive director based on an agreement of an average of thirty-two hours per week. This contract requires that the executive director provide administrative and management function and office space. The contracted professional assumes expenses for regular office and operational costs, does not receive benefits, and is responsible for all relevant taxes and insurance. The DSUs provide for some additional administrative support and the use of equipment services such as the high-speed copier and the mail system. There are conference rooms located at the Waterbury State Complex (where the DSUs are located) which are often used for committee and council meetings – these rooms are also used for other small professional meetings. The DSU (VR) appoints a staff person within the division to serve as a liaison between the SILC and the DSUs and this person participates with a number of active and standing committees.

5.1B Describe how the following SILC resource plan requirements will be addressed:

- The SILC will be responsible for the proper expenditure of funds and the use of resources it receives as defined by the approved SILC Budget.
- No conditions or requirements are included in the SILC Budget that will compromise the independence of the SILC.
- While assisting the SILC in carrying out its duties under the SPIL, staff and other personnel assigned to the SILC under the SILC Budget will not be assigned duties by the DSU(s) or other agency or office of the State that would create a conflict of interest.

5.2 Establishment and Placement – 34 CFR 364.21(a)

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies.

The SILC is not established as an entity within any State agency, including the DSU(s), and is independent of the DSU(s) and all other State agencies. Following is a brief description of the legal status and placement of the SILC:

The SILC is a free-standing body whose members are appointed by the Governor. It hires and supervises its executive director, who is a subcontractor of the DSU(s), although it has autonomy and is self-governing and receives some administrative support from them.

5.3 Appointment and Composition – 34 CFR 364.21(b) – (f)

Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b).

The SILC has appointed membership and nominating committees that are responsible for the recruitment of new SILC members and officer nominations respectively. There is an annual assessment of representation regarding geographic areas, disability groups and skills that are present on the SILC

council. This is the base for a recruitment process and the prioritization of potential new members.

People who are interested in serving on the SILC must complete an application process and attend at least one council meeting. The membership makes recommendations to the full council for their endorsement. If the full council supports an appointment through council vote, their application is then forwarded on, via administrative channels at the Department of Disabilities, Aging and Independent Living, to the Governor with a request for appointment.

The SILC nominating committee is responsible for developing a slate of nominations for officers for the SILC, including the chair, annually. Officers, including the Chair, positions are voted by the full council.

5.4 Staffing – 34 CFR 364.21(j)

Describe how the following SILC staffing requirements will be met:

The SILC staff consists of one part-time contracted executive director. The council selects, supervises and evaluates the executive director. The DSU facilitates and administrates the contract.

Section 6: Service Provider Requirements

Describe how the following service provider requirements will be met:

6.1 Staffing – 34 CFR 364.23; 34 CFR 364.24; 34 CFR 364.31

- Personnel Administration (Sec. 12(c), 704(m) of the Act; 34 CFR 364.23)
 - (a) The staff of service providers will include personnel who are specialists in the development and provision of IL services and in the development and support of CILs.
 - (b) To the maximum extent feasible, each service provider will make available personnel able to communicate --
 - (1) With individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille, or audio tape, and who apply for or receive IL services under the SPIL; and
 - (2) In the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under the SPIL.

- Personnel Development (Sec. 12(c), 704(m) of the Act; 34 CFR 364.24)

The State assures that service providers will establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development program will emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of the IL philosophy.

- Affirmative Action (Sec. 704(m)(2) of the Act; 34 CFR 364.31)

All recipients of financial assistance under Chapter 1 take affirmative action to employ and advance in employment qualified individuals with disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act.

- Nondiscrimination (34 CFR 76.500)

No individual will, on the basis of race, color, national origin, gender, age, or disability be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination under this SPIL.

6.2 Fiscal Control and Fund Accounting – 34 CFR 364.34

- Adoption of those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for funds made available through parts B and C of chapter 1 of title VII of the Act, in addition to complying with applicable EDGAR fiscal and accounting requirements.

All recipients of financial assistance under Chapter 1 will adopt such fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for funds paid to the State under Chapter 1.

6.3 Recordkeeping, Access and Reporting – 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37

- Maintenance of records that fully disclose and document the information listed in 34 CFR 364.35.
- Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate
- Access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

➤ **Financial Record Keeping (Sec. 704(m)(4)(A) and (B) of the Act; 34 CFR 364.35)**

All recipients of financial assistance under Chapter 1 will:

(a) Maintain records that fully disclose--

- (1) the amount and disposition by each recipient of the proceeds of such financial assistance,
- (2) the total cost of the project or undertaking in connection with which such financial assistance is given or used, and
- (3) the amount of that portion of the cost of the project or undertaking supplied by other sources; and
- (4) compliance with the requirements of Chapter 1 and 34 CFR Parts 364, 365, 366, and 367.

(b) Maintain such other records as the Secretary determines to be appropriate to facilitate an effective audit.

➤ **Financial Reports (Sec. 704(m)(4)(D) of the Act; 34 CFR 364.36)**

All recipients of financial assistance under Chapter 1 will submit reports with respect to records required in section 7.3 of the SPIL, as the Secretary determines to be appropriate.

➤ **Access to Financial Records (Sec. 704(m)(4 & 5) of the Act; 34 CFR 364.37)**

All recipients of financial assistance under Chapter 1 will afford access to the Secretary and the Comptroller General or any of their duly authorized representatives, for the purpose of conducting audits and examinations, to all records maintained pursuant to section 7.3 of the SPIL immediately above and any other books, documents, papers, and records of the recipients that are pertinent to the financial assistance received under Chapter 1.

6.4 Eligibility – 34 CFR 364.40; 34 CFR 364.41

- Eligibility of any individual with a significant disability, as defined in 34 CFR 364.4(b), for IL services under the SILS and CIL programs.
 - Ability of any individual to seek information about IL services under these programs and to request referral to other services and programs for individuals with significant disabilities.
 - Determination of an individual's eligibility for IL services under the SILS and CIL programs in a manner that meets the requirements of 34 CFR 364.51.
 - Application of eligibility requirements without regard to age, color, creed, gender, national origin, race, religion, or type of significant disability of the individual applying for IL services.
 - Non-exclusion from receiving IL services of any individual who is present in the State and who is otherwise eligible for IL services, based on the imposition of any State or local residence requirement.
- Individuals with significant disabilities are eligible for services provided under the SPIL.
- To be eligible, an individual is one:
- (1) Who has a significant physical, mental, cognitive, or sensory impairment;
 - (2) Whose ability to function independently in the family or community or whose ability to obtain, maintain, or advance in employment is substantially limited; and
 - (3) For whom the delivery of IL services will improve the ability to function, continue functioning, or move towards functioning independently in the family or community or to continue in employment.

6.5 Independent Living Plans – 34 CFR 364.43(c)

- Provision of IL services in accordance with an IL plan complying with Sec. 364.52 and mutually agreed upon by the individuals with significant disabilities and the appropriate service provider staff unless the individual signs a waiver stating that an IL plan is unnecessary.

The State provides IL services under Chapter 1 to individuals with significant disabilities in accordance with an ILP mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary.

6.6 Client Assistance Program (CAP) Information – 34 CFR 364.30

- Use of accessible formats to notify individuals seeking or receiving IL services under chapter 1 of title VII about the availability of the CAP program, the purposes of the services provided under the CAP, and how to contact the CAP.

All recipients of financial assistance under Chapter 1 that provide services to individuals with significant disabilities advise those individuals seeking or receiving IL services about the availability of the Client Assistance Program under section 112 of the Act, the purposes of the services provided under such program, and information on the means of seeking assistance under such program.

6.7 Protection, Use and Release of Personal Information – 34 CFR 364.56(a)

- Adoption and implementation of policies and procedures meeting the requirements of 34 CFR 364.56(a), to safeguard the confidentiality of all personal information, including photographs and lists of names.

All personnel files and applications are maintained as confidential for the required period of time.

Section 7: Evaluation

Describe the method that will be used to periodically evaluate the effectiveness of the plan in meeting the objectives established in Section 1. The description must include the State’s evaluation of satisfaction by individuals with significant disabilities who have participated in the program. 34 CFR 364.38

- The State establishes a method for the periodic evaluation of the effectiveness of the SPIL:
 - (1) In meeting the State's objectives and timelines for meeting those objectives;
 - (2) In the satisfaction of individuals with disabilities; and
 - (3) In meeting the objectives established in the SPIL.
- The State agrees to annually submit the results of DSU(s) and SILC evaluation activities, including the most recent evaluation of Title VII consumer satisfaction, with the annual performance report to RSA.

Section 8: State-Imposed Requirements

Identify any State-imposed requirements contained in the provisions of this SPIL. Indicate N/A if not applicable. 34 CFR 364.20(h)

Not Applicable