# State Plan for Independent Living (SPIL) for Connecticut for 2017-2019

### **General Information**

Designated Agency Identification

State: Connecticut

Agency: Bureau of Rehabilitation Services

Plan for: 2017-2019

Submitted in fiscal year: 2016

View grant 90IS0063-01 in the Grant Award screen.

#### 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.

Yes.

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.

Yes.

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.

Yes.

- 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. Yes
- 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. Yes
- 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. Yes
- 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 David Doukas, BRS, Director and Brian Sigman, BESB, Director.

#### 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;
- 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.

#### Yes

- 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. Yes
- 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;
  - 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.

#### Yes

- 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. Yes
- 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. Yes
- 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. Yes

#### Section 3: Independent Living Services

- 3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other fundsYes
- 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. Yes

- 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.

Yes

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

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.Yes
- 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. Yes
- 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. Yes

#### 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. Yes
- 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, 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.

- 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. Yes
- 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.Yes

#### 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. Yes

#### 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.

#### Yes

- 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. Yes
- 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. Yes

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). Yes

Section 9: Signatures

As the authorized signatories, we will sign, date and retain in the files of the state agency(ies) and the Statewide Independent Living Council the Part I: Assurances, 1-8, and the separate Certification of Lobbying forms ED-80-0013 (available in MS Word and PDF formats) for the state independent living program (Part B) and the centers for independent living program (Part C).

The effective date of this SPIL is October 1, 2016.

Section 9: Signature for SILC Chairperson

NameKatherine Pellerin

TitleSILC, Chairperson

Signed?Yes

Date signed06/30/2016

Section 9: Signature for DSU Director

NameDavid Doukas

TitleBRS, Director

Signed?Yes

Date signed06/30/2016

Section 9: Signature for Separate State Agency for Individuals Who Are Blind

Is there a Separate State Agency for Individuals Who Are Blind?Yes

NameBrian Sigman

TitleBESB, Director

Signed?Yes

Date signed06/30/2016

## Part II: Narrative: Section 1 - Goals, Objectives and Activities

#### Section 1: Goals, Objectives and Activities

#### 1.1 Goals and Mission

Describe the overall goals and mission of the State's IL programs and services. The SPIL must address the goals and mission of both the SILS and the CIL programs, including those of the State agency for individuals who are blind as they relate to the parts of the SPIL administered by that agency.

Goal Name: Develop Independent Living opportunities and resources through education.

#### Goal Description:

SILC is charged with reducing barriers that persons with disabilities experience from the perspective of individual consumers as well as from a systemic perspective. The SILC works in partnership with the DSUs, state and federal agencies, the five (5) Centers for Independent Living (CILs) and non-profit partners to identify these barriers, develop and implement policy initiative and provide advocacy, communication and education on statewide initiatives. The SILC will partner with the CILs, Cross Disability Alliance, and other organizations to promote: 1.) Liveable and Visitable communities; 2.) employment, housing and transportation resources; and 3.) emergency management training.

From 2017-2019, a total of \$4,000 in Part B funds will support this goal.

Goal Name: Maintain, sustain and expand the capacity of the five CILs.

#### Goal Description:

Centers for Independent Living play a vital role in assisting consumers with disabilities to live independently and to exercise choice. In CT, the five CILs receive federal and state funding to support the delivery of core independent living services including consumer and systems advocacy; independent living skills training; information and referral services; peer counseling; and youth transition services from school to work, as well as from nursing homes and other institutions to the community.

The CILs receive state and federal funding for administrative and operational costs as well as a limited amount of funding from other resources including fundraising and grants. The CILs have received a 30% reduction for the FY '2017 state budget. The loss of \$129,279 in FY '2017 state funding will directly impact staffing at each CIL and reduce services to consumers. Thus, it is imperative that the 2017-2019 SPIL funds support activities that will assist the CILs to assess, maintain and support the needs of consumers by maximizing other sources of revenue and resources. To this end, the SILC will assist the CILs to maintain and support the CIL network of

services by assisting with: 1.) data collection emphasizing outcomes; 2.) sustainability funding; 3.) education and marketing; and 4.) resource development, training and technical assistance.

From 2017-2019, a total of \$373,160 in Part B funds will support this goal.

Goal Name:Purchase goods and services for consumers who have approved IL plans or waivers.

#### Goal Description:

The availability of funds to offset expenditures for goods and services is essential to the completion of Independent Living Plans and remains a critical resource for strategic interventions, which are often vital to the success of a consumer?s plan. \$15,000 per CIL will be available for Years 1-3. In former SPILs, the Bureau of Education and Services for the Blind (BESB), the designated state blind agency, received an annual allocation of Part B funding from ACL and passed through the majority of the funding to support the SPIL. However, in light of the FY '2017 state budget, BESB has generously given up their SPIL funds (a total of \$18,000) in order that additional funding can support CIL SPIL projects.

From 2017-2019, a total of \$225,000 in Part B funds will support this goal.

Goal Name: Support the SILC operation and resource plan and DORS contract administration.

#### Goal Description:

Since 2006, the SILC has received funds from Section 101 (a)(18) of the Rehabilitation Act (Innovation and Expansion) through DORS to support the SILC operations. The funding supports the operation of the statewide nonprofit to include, but not limited to: two staff, health insurance stipends, office space, interpreters for board members and meetings, PCAs, transportation for board members, resource materials, office supplies and meeting costs.

For the 2017-2019 SPIL, DORS will fund the SILC resource plan at \$51,500 through Federal funds (Sec. 101(a)(18) of the Act) Innovation and Expansion funds for Year 1 only. Therefore, SPIL funds will be allocated at the approved rate of 30% for Year 1. Given that the Innovation and Expansion funds will not continue past Year 1, the SILC requests approval from ACL to increase the rate from 30% to 40% to support SILC operations in Years 2-3.

From 2017-2019, a total of \$356,600 in Part B funds will support this goal as follows:

Year 1: \$102,900 (\$86,850 for SILC operations at 30% and \$16,050 for DORS fiscal administration at 5%);

Year 2-Year 3: \$263,700 (\$115,800 for SILC operations and \$16,050 for DORS fiscal administration (5%) annually for two years.)

Goal Name:

Goal Description:	
Goal Name:	
Goal Description:	

### 1.2 Objectives

1.2A. Specify the objectives to be achieved and the time frame for achieving them.

Goal(s) from Section 1.1	Objective to be achieved	Time frame start date	Time frame end date
Develop Independent Living opportunities and resources through education.	Goal 1, Objective 1: To provide education, leadership and support to and through the CT Cross Disability Lifespan Alliance in order to further promote statewide cross-disability advocacy, coordination, education and legislation.	10/01/2016	09/30/2019
Develop Independent Living opportunities and resources through education.	Goal 1, Objective 2: To promote community inclusion by encouraging supports and resources that keep people in the community and develop Livable and Visitable communities.	10/01/2016	09/30/2019
Develop Independent Living opportunities and resources through education.	Goal 1, Objective 3: To partner with CT Rises, FEMA, UCEDD, and other organizations to provide ongoing training and resources on emergency management.	10/01/2016	09/30/2019
Develop Independent Living opportunities and resources through education.	Goal 1, Objective 4: To partner with state agencies and various organizations to develop, expand and support employment, housing and transportation programs and services for people with disabilities.	10/01/2016	09/30/2019
Maintain, sustain and expand the capacity of the five CILs.	Goal 2, Objective #1: To provide operating funding and/or sustainability funding for CILs.	10/01/2016	09/30/2019
Maintain, sustain and expand the capacity of the five CILs.	Goal 2, Objective #2: To implement the IL Funding Allocation Model in order to assess the needs, funding and resources to fully fund and support the delivery of independent living	10/01/2016	09/30/2019

services on a statewide basis and to develop policy papers to help brief policy makers, consumers, and media on Independent Living.		
Goal 2, Objective 3: To provide training, technical assistance and resource development to support CIL and SILC staff and board members in the areas of aging, non-profit management, pre-employment/employment, sustainability, youth transition and other areas as identified.	10/01/2016	09/30/2019
Goal 2, Objective #4: To create a plan to develop an Independent Living statewide campaign on the importance, philosophy and services provided by the CILs.	10/01/2016	09/30/2019
Goal 2, Objective #5: To continue the Data/Tech Committee to further build upon the development of unified reporting formats, consumer satisfaction survey, return on investment/outcomes and accountability system to include site review tools and training.	10/01/2016	09/30/2019
Goal 3, Objective 1: To provide \$15,000 in Years 1-3 to each CIL for the purchase of consumer goods and direct services.	10/01/2016	09/30/2019
Goal 3, Objective 2: To coordinate quarterly reporting on consumer goods and direct services, in order to track consumer needs and trends.	10/01/2016	09/30/2019
Goal 4, Objective 1: To support the SILC operations and the DORS administration and contract management of the Title VII funds.	10/01/2016	09/30/2019
Goal 4, Objective 2: To develop a strategic workplan for 2017-2019 that outlines the SILC organizational operations and provides a detailed quarterly update for the development, implementation and evaluation of the SPIL goals and the roles and responsibilities of the SILC and DSE.	10/01/2016	09/30/2017
	policy papers to help brief policy makers, consumers, and media on Independent Living.  Goal 2, Objective 3: To provide training, technical assistance and resource development to support CIL and SILC staff and board members in the areas of aging, non-profit management, pre-employment/employment, sustainability, youth transition and other areas as identified.  Goal 2, Objective #4: To create a plan to develop an Independent Living statewide campaign on the importance, philosophy and services provided by the CILs.  Goal 2, Objective #5: To continue the Data/Tech Committee to further build upon the development of unified reporting formats, consumer satisfaction survey, return on investment/outcomes and accountability system to include site review tools and training.  Goal 3, Objective 1: To provide \$15,000 in Years 1-3 to each CIL for the purchase of consumer goods and direct services.  Goal 3, Objective 2: To coordinate quarterly reporting on consumer goods and trends.  Goal 4, Objective 1: To support the SILC operations and the DORS administration and contract management of the Title VII funds.  Goal 4, Objective 2: To develop a strategic workplan for 2017-2019 that outlines the SILC organizational operations and provides a detailed quarterly update for the development, implementation and evaluation of the SPIL goals and the roles and responsibilities of the SILC and	policy papers to help brief policy makers, consumers, and media on Independent Living.  Goal 2, Objective 3: To provide training, technical assistance and resource development to support CIL and SILC staff and board members in the areas of aging, non-profit management, pre-employment/employment, sustainability, youth transition and other areas as identified.  Goal 2, Objective #4: To create a plan to develop an Independent Living statewide campaign on the importance, philosophy and services provided by the CILs.  Goal 2, Objective #5: To continue the Data/Tech Committee to further build upon the development of unified reporting formats, consumer satisfaction survey, return on investment/outcomes and accountability system to include site review tools and training.  Goal 3, Objective 1: To provide \$15,000 in Years 1-3 to each CIL for the purchase of consumer goods and direct services.  Goal 3, Objective 2: To coordinate quarterly reporting on consumer goods and trends.  Goal 4, Objective 1: To support the SILC operations and the DORS administration and contract management of the Title VII funds.  Goal 4, Objective 2: To develop a strategic workplan for 2017-2019 that outlines the SILC organizational operations and provides a detailed quarterly update for the development, implementation and evaluation of the SPIL goals and the roles and responsibilities of the SILC and

#### 1.2 Objectives

1.2B Describe the steps planned 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.

• Identify the populations to be designated for targeted outreach efforts

In Connecticut, there are five Centers for Independent Living. The overall population of Connecticut is approximately 3.5 million with the following ethnic breakdown: 84.3% White; 10.3% Black; .4% American Indian; 3.5% Asian; .1% Native Hawaiian; and 1.5 Biracial. However, it is important to note that significant numbers of racial/ethnic minority populations reside in the urban areas of the state primarily the cities of Bridgeport, Hartford and New Haven and these populations include but are not limited to West Indians, Latinos, African-Americans and Brazilians. Three of the five CILs are located in and/or adjacent to the three cities mentioned above: Bridgeport (Access Independence located in Stratford) Hartford (Independence Unlimited located in Hartford) and New Haven (Center for Disability Rights located in West Haven).

• Identify the geographic areas (i.e., communities) in which the targeted populations reside

All the centers receive equal Part B and Part C funding and serve consumers who reside in one of the five geographic areas of the state: Independence Unlimited Inc. (North Central); Disabilities Network of Eastern Connecticut (Eastern) Independence Northwest Inc. (Northwest); Center for Disability Rights (South Central); and Access Independence (Southwest). Within these geographical regions, some areas continue to be underserved including but not limited to the Northeast and Northwest corners, the western area that border New York and lower Fairfield County.

• Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed

The CILs will partner with appropriate ethnic and cultural organizations, faith-based organizations and resident groups in order to outreach to minority populations. Brochures, educational materials, intake forms, etc. will be translated into appropriate languages. The SILC reviews regularly all demographic reports including the US Census and American Community Survey data, along with any state or local data reports. The US Census and American Community Survey data will be used to develop the IL Funding Formula Allocation Model for Connecticut, which will assist us with future planning, policy making and program development.

The CILs, SILC and DSE work to regularly assess the changing needs and demographics and seek activities, programs and ways to meet the changing needs. In addition, the SILC is responsible for assuring diversity of its council members, thereby obtaining the input of a broad range of stakeholders in design, development and implementation of the SPIL. The SILC is in the process of recruiting for new council members and seeks to have an ethnically and culturally diverse council as possible. Specifically, Goals 2 and 3 will provide opportunities to expand upon the delivery of independent living services to underserved and unserved populations and

communities. In addition, the SILC will utilize primary and secondary data gathered from a variety of sources to include the US Census; American Community Survey; The Center on Aging, University of Connecticut Health Center Demographic Analysis of Individuals with Disabilities report published by CT-SILC; ILRU; SILC-Net; and NCIL to obtain current demographic changes and trends.

#### 1.3 Financial Plan

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

Complete the financial plan tables covering years 1, 2 and 3 of this SPIL. For each funding source, provide estimated dollar amounts anticipated for the applicable uses. The financial plan table should include only those funding sources and amounts that are intended to support one or more of the objectives identified in section 1.2 of the SPIL. To the extent possible, the tables and narratives must reflect the applicable financial information from centers for independent living. Refer to the SPIL Instructions for additional information about completing the financial tables and narratives.

Year 1 - 2017Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	86450	75000	111000	18000
Title VII Funds Chapter 1, Part C		419880	419880	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	51500			
Other Federal funds - other				
Non-Federal funds - State funds		186349	186349	
Non-Federal funds - Other				
Total	137950	681229	717229	18000

Year 2 - 2018Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	115800	75000	111000	17000
Title VII Funds Chapter 1, Part C		419880	419880	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	0			
Other Federal funds - other				
Non-Federal funds - State funds		186349	186349	
Non-Federal funds - Other				
Total	115800	681229	717229	17000

Year 3 - 2019Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	115800	75000	111000	12000
Title VII Funds Chapter 1, Part C		419880	419880	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	0			
Other Federal funds - other				

Non-Federal funds - State funds		186349	186349	
Non-Federal funds - Other				
Total	115800	681229	717229	12000

#### **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.

Total budget for Goal #1: \$4,000. \$2,000 in Years 1 and \$1,000 in Years 2-3) for interpreters, transportation and meeting coordination and supplies.

Total budget for Goal #2: \$373,160

Year 1: \$127,000

- -\$111,000 total for five (5) CILs to support operational costs and continuation of sustainability projects (\$22,200 per CIL);
- -\$6,000 to support the development of the IL Funding Formula;
- -\$5,000 to support the development of an online reporting system;
- -\$5,000 to support training and technical assistance for CILs and SILC.

Year 2: \$121,000

- -\$111,000 total for five (5) CILs to support operational costs and continuation of sustainability projects (\$22,200 per CIL);
- -\$5,000 to support the development of an online reporting system;
- -\$5,000 to support training and technical assistance for CILs and SILC.

Year 3: \$125,160

- -\$111,000 total for five (5) CILs to support operational costs and continuation of sustainability projects (\$22,200 per CIL);
- -\$12,160 to support training and technical assistance for CILs and SILC.
- -\$2,000 to support consumer satisfaction survey.

Total budget for Goal #3: \$225,000

\$75,000 per year, Year 1-3 (\$15,000 per CIL per year for 3 years)

Total budget for Goal #4: \$356,600

Year 1: \$102,900

-\$86,850 for SILC operations at 30%;

-\$16,050 for DORS fiscal administration at 5%

Year 2-Year 3: \$263,700 (\$131,850 per year)

-\$115,800 for SILC operations at 40%;

-\$16,050 for DORS fiscal administration at 5%

GRAND TOTAL: \$958,760.00 (Approximately \$321,000 per year. This includes the federal grant award, state match and Year 1 carry forward funds.)

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.

DORS will direct federal Innovation & Expansion (I&E) funds to partially support the operation of the SILC. All funding streams including Part C, Part B, I&E are considered and coordinated as the State Plan for Independent Living is developed. For example, Part B funds are directed to support technology needs, staff training, and organizational capacity building to existing CILs. While Part C funds are directed for general operations of the CILs and while it can be defined that technology, training and capacity-building are general operations, the SILC and DSUs are aware that Part C alone is inadequate to fund general operations. Part B is utilized to support CILs when needs arise. State funds (\$372,698) are also used to support general CIL operations and independent living services. State contracts are based on standards and indicators, as outlined in the Rehabilitation Act, section 725 mandated provision of core services.

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.

DORS, in keeping with the WIOA requirement, provides contract administration support for the CILs state and federal funds and the SPIL funds. In addition, the BESB Independent Living Services Grant Coordinator has served as an Ex-Officio SILC member and continues to serve on various SILC committees to include Board Development, By-Laws and SPIL Development.

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

The overarching goal of the 2017-2019 SPIL is to link work plan objectives with the SPIL goals. To this end, the SPIL seeks to provide capacity-building and organizational support to the CILs in order to support the provision of IL services, pre-employment/employment opportunities for consumers, and services to unserved and underserved consumers and geographic areas. In

addition, the SPIL seeks to support CILs by providing non-profit organizational development training and technical assistance. Two of the four SPIL goals focus on CIL capacity-building, sustainability and increased consumer services.

For over 15 years, the SILC has received its resource plan funding through the DSU's Innovation and Expansion federal funds. As a result of CT state budget reductions, the DSU can only fund the resource plan with I&E funds (\$51,500) for Year 1 of the 2017-2019 SPIL. Therefore, the SILC resource plan must be significantly reduced from \$149,654,000 annually to \$115,000 (\$115,000 is at the requested 40%). As a result of the I&E elimination, the SILC has undergone a series of meetings with the Executive Committee to look at budget options and cost cutting measures. To this end, the SILC will move its office in July 2016 to a free office space within the University of CT Center for Excellence in Developmental Disabilities and will reduce all contractual, administrative and program costs. Given the I&E funding loss and cost reductions, we are respectfully requesting the SPIL allocate 40% for the SILC resource plan for Years 2-3. At the 40% in Years 2-3, the SILC resource plan will be as follows: \$149,654 in Year 1 and \$115,369 in Years 2-3. The \$115,369 budget is a reduction in resource plan line items, but will allow to the SILC to continue to maintain organization goals and mandates and all SPIL requirements.

#### 1.4 Compatibility with Chapter 1 of Title VII and the CIL Work Plans

## 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.

In preparation for the 2017-2019 SPIL, the Executive Director and SILC Executive Committee members conducted meetings with each CIL Board of Directors in order to obtain input from staff and consumers for the 2017-2019 SPIL. The meetings were held to not only obtain suggestions for the SPIL, but to better understand the goals, objectives and needs of the CILs in order to improve and coordinate the CILs, SILC and DSU partnership. In addition, the SILC conducted two public hearings, numerous meetings with SILC members and partners and solicited input through social media.

# 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.

In January 2016, the Executive Director and SILC Chairperson began to conduct meetings with CILs to include consumers, staff and board members to obtain input and recommendations for the 2017-2019 SPIL. The meetings were held to not only obtain suggestions for the SPIL, but to better understand the goals, objectives and needs of each CILs in order to better coordinate the CILs, SILC and DSU partnership. In addition, the SILC conducted two public hearings, outreached and obtained input via social media, held meetings with SILC members and partners obtain input for the formation of SPIL goals.

## 1.5 Cooperation, Coordination, and Working Relationships Among Various Entities

Describe 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.

The description must identify the entities with which the DSU and the SILC will cooperate and coordinate.

The DSUs, the CIL directors and the SILC director will meet regularly to discuss progress on SPIL goals. The SILC has ex-officio DSU representatives on the SILC and the representative is encouraged to be a member of all committees, especially the SPIL development committee. In addition, the SILC has representation to both State Rehabilitation Councils (SRC). However, the SILC seat on the BESB SRC is currently vacant and the SILC is working with BESB staff and the Board Development Committee to find an appropriate representative to fill the BESB SRC vacancy. Through the SPIL goals, partnerships will continue with various state disability agencies, along with various disability non-profit organizations across the state.

Teams are critical to coordination of services and avoiding duplication of services. Various consultants and counselors at BRS and BESB work in a team environment with IL staff as needs arise to share expertise specific to individual consumers. During a team process, the CIL staff is the lead relative to IL plans (including transition from nursing homes and youth transition) and the DORS counselor is the lead on IL needs relative to an employment plan. Through teamwork, unnecessary duplication is avoided.

The DSUs and CILs also exchange referrals, recognizing that each provider offers unique services necessary for consumers to reach their independent living goals. Services are coordinated at the local level between partners to avoid duplication and to maximize self-direction on the part of the individual consumer. Under Connecticut's Money Follows the Person, all partners are actively engaged in ensuring that IL services provided by all parties are coordinated.

The services provided by the DSUs independent living programs are unique, specialized, and targeted to meet the needs of consumers where other resources do not exist or are minimally available. Policies and procedures within the agency stipulate that the agency pursue comparable benefits whenever practical, such as access to Medicaid, Medicare or private insurance. When other resources do exist, this information is made available to consumers, consistent with the practice of informed choice and consumer control.

#### 1.6 Coordination of Services

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 Title VII, Chapter 2 Older Blind Grant Program and the Part B Independent Living Services Program, are not duplicative of IL services rendered by the CILs. The CILs refer consumers to BESB that are in need of specialized training and adaptive equipment such as Closed Circuit Television Viewers (CCTVs) that the Bureau can provide to qualified individuals with approved IL or IPE plans.

In addition, DSUs and the CILs collaborate with the Department of Developmental Services, various divisions of the Department of Social Services (Medicaid), the Department of Housing, the State Department of Aging, the Area Agencies on Aging, the Department of Mental Health and Addiction Services, the Department of Transportation, the Office of Protection and Advocacy and the State Department of Education as well as other nonprofit agencies to provide coordinated delivery of independent living services.

Connecticut has two comprehensive initiatives that seek to coordinate agencies administering special education, vocational education, developmental disabilities, public health, mental health, housing and transportation for people with disabilities. In particular, the initiatives have had major impact on enhancing the collaborative opportunities of the state and local agencies involved in the provision of services to people with disabilities. The initiatives are: 1) the Money Follows the Person Rebalancing Demonstration (MFP), and 2) the Aging and Disability Resource Centers (ADRCs).

Money Follows the Person has enabled more Medicaid recipients living in long term care facilities, such as nursing facilities to move back to their communities. The Connecticut Department of Social Services applied to participate in the national Money Follows the Person Rebalancing Demonstration. The application was successful and in January 2007, Connecticut was awarded with the opportunity to participate in the demonstration. The demonstration is the largest Medicaid systems change initiative ever funded by the federal government. Connecticut's Demonstration has 2 goals: 1) Reduce reliance on institutional care; 2) Increase the efficiency and effectiveness of long term care systems.

Success of the demonstration is based on attainment of 5 annual benchmarks. Each benchmark was established as a measure indicating Connecticut's advancement towards increased choice and reduced reliance on institutional care. In the review of the first year evaluation of MFP, it was noted that the increased networking and collaboration between the different state agencies and waiver providers, as well as the multiple community providers, increased the overall success of this project to date. The Steering Committee includes multiple stakeholders, with representation from Departments of Social Services, Developmental Services, Mental Health and Addiction Services, Economic and Community Development, and Office of Policy and Management, Connecticut Legal Services, ARC of Connecticut, Commission on Aging, AARP, Brain Injury Association, MS Society, ADAPT of CT, University of Hartford, Council on Developmental Disabilities, and self advocates and care givers. Another identified strength of the MFP program is the number of workgroups developed to work on different aspects of MFP. A common strength of most of the workgroups was a core number of diverse, engaged stakeholders representing providers, individuals with disabilities, and state agencies.

The Administration for Community Living developed a national initiative for the development of the No Wrong Door (NWD) to promote the integration of long-term care information and referral services, benefits and options counseling services, and access to publicly and privately financed services and benefits for those in need of long-term supports and their families. The initiative ideally restructures existing resources and programs while complementing other long term care system change activities designed to enhance access to community living for both older and disabled adults by empowering them to make informed decisions through a streamlined long-term support system. The NWD national vision is to have organizations in every community serving as highly visible and trusted places where people of all incomes and ages can turn for information on the full range of long-term support options and a single point of entry for access to public long-term support programs and benefits.

In Connecticut, NWD offers a range of information about long-term care community supports, from a simple name and phone number to detailed help concerning community services, benefits counseling, policies and procedures, and assistance with completing applications to services. While CT established five (5) partner-based NWD centers, only three (3) entities are currently funded (one of which is a Center for Independent Living and two are Area Agencies on Aging).

#### 1.7 Independent Living Services for Individuals who are Older Blind

Describe 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 program manager of the Older Individuals who are Blind (OIB) program has served as an ex-officio member of the SILC and reported regularly on OIB activities as well as other BESB activities at SILC meetings. The SILC and DSUs will continue to collaborate and partner in projects like the outreach campaign created in conjunction with the Helen Keller National Center entitled "Losing Sight and Sound without Losing Your Identity." The former campaign targeted to older adults who have vision and hearing loss included a series of community and consumer outreach activities including an exhibit at the CT Legislative Office Building, as well as 8 presentations at senior centers focusing on services that are available through various state and community agencies. Special emphasis will be put on promotion of the new grant available through FCC funding for deafblind individuals to improve telecommunications access.

# Part II: Narrative: Section 2 - Scope, Extent, and Arrangements of Services

#### 2.1 Scope and Extent

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 - Information and referral	No	Yes	Yes
Core Independent Living Services - IL skills training	No	Yes	Yes
Core Independent Living Services - Peer counseling	No	Yes	Yes
Core Independent Living Services - Individual and systems advocacy	No	Yes	Yes
Counseling services, including psychological, psychotherapeutic, and related services	Yes	No	No
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)	Yes	Yes	Yes
Rehabilitation technology	Yes	Yes	Yes
Mobility training	Yes	No	Yes
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	Yes	Yes	Yes

	1	I	
Personal assistance services, including attendant care and the training of personnel providing such services	Yes	Yes	Yes
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	No	Yes	Yes
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	No	No	Yes
Education and training necessary for living in the community and participating in community activities	No	Yes	Yes
Supported living	No	No	Yes
Transportation, including referral and assistance for such transportation	No	No	Yes
Physical rehabilitation	Yes	No	No
Therapeutic treatment	No	No	Yes
Provision of needed prostheses and other appliances and devices	Yes	No	Yes
Individual and group social and recreational services	No	Yes	Yes
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	Yes	Yes	Yes
Services for children with significant disabilities	Yes	Yes	Yes
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	Yes	Yes	Yes

Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	Yes	Yes	Yes
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	Yes	Yes	Yes
Other necessary services not inconsistent with the Act	Yes	Yes	Yes

- 2.1B Describe any service provision priorities, including types of services or populations, established for meeting the SPIL objectives identified in section 1.2.
- 1.) Goal 2 seeks to maintain the capacity and sustainability of the five Centers for Independent Living.
- 2.) Goal 2 seeks to maintain and expand the capacity and sustainability of the five CILs, with a key objective to provide comprehensive non-profit training to assist the CILs with improving their marketability and sustainability, in an ever changing and competitive non-profit sector.
- 3.) Goal 3 addresses the need for consumer goods and services to assist Independent Living goals.
- 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.

#### Indicate N/A if not applicable.

In an effort to be in compliance with non-IL funding requirements, Connecticut may implement a fee schedule for NWD related services, including but not limited to ADRC assessments, Options Counseling and Information and Assistance. The CT NWD have conducted time studies and have developed a sliding scale fee schedule and policies that will be instituted uniformly across the state at the CILs and Area Agencies on Aging. CILs will maintain consumer documentation of these services in each consumer CSR, in additional to maintaining financial records.

2.2 Arrangements for State-Provided Services

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.

The DSU contracts directly with each of the 5 Centers for Independent Living for the provision of core independent living services, along with general CIL operations and SPIL-funded projects. In addition, contracts will be developed for any third party consultant providing education, program support, training and technical assistance to the CILs and/or SILC. Additionally, BESB provides rehabilitation technology and mobility services.

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 DSUs delegate responsibility for the determination of an individual's eligibility for services to the five Centers for Independent Living through a legal contract that mandates the CILs service delivery authority and responsibilities. However, it is important to note that CIL consumers (that may also be BESB or BRS consumers) self-report and self-determine their disability, goals and services.

## Part II: Narrative: Section 3 - Design for the Statewide Network of Centers

#### 3.1 Existing Network

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.

The five Connecticut Centers for Independent Living represent the eight Connecticut counties. It is important to note that Connecticut has never had strong county governments and since 1960, the names and boundaries of its eight countries have existed only as geographical names used to define parts of the state and weather conditions. Connecticut's CILs are strategically located throughout the state to provide statewide coverage for the delivery of IL core services. All the CILs receive equal amounts of state and federal funding and service all populations within their service area. The CILs overlap counties, but do not overlap cities and towns. The CIL service areas are as follows:

- 1.) Region 1 (Southwest Region) is serviced by Access Independence (SPIL signatory) located in Stratford, CT, which is adjacent to the city of Bridgeport that holds the largest number of residents with disabilities (approximately 32,000) in the region. AI services the cities and towns in Fairfield County.
- 2.) Region 2 (South Central Region) is served by Center for Disability Rights in West Haven, CT, which is next door to the city of New Haven that holds the largest number of residents with disabilities (approximately 25,000) in the region. CDR serves the cities and towns in New Haven County and Middlesex County.
- 3.) Region 3 (Eastern Region) is served by Disabilities Network of Eastern Connecticut (SPIL signatory) located in Norwich, CT, which is home to the largest community of individuals with disabilities (approximately 8,000) in the region, DNEC serves cities and towns in New London County, Windham County and Tolland County.
- 4.) Region 4 (North Central Region) is served by Independence Unlimited located in Hartford, CT, which is home to the largest community of individuals with disabilities (approximately 30,000) in the region. IU serves cities and towns in Hartford County and Tolland County.
- 5.) Region 5 (Northwest Region) is served by Independence Northwest (SPIL signatory) located in Naugatuck, CT, which is adjacent to the city of Waterbury that holds the largest number of residents with disabilities (approximately 23,000) in the Northwest region. IN serves cities and towns in Litchfield County, New Haven County, and Fairfield County.

In 1988, CT's Independent Living Advisory Council developed a five-year plan to establish 8 CILs in the state. The plan divided the state into 8 geographic regions, with a center proposed for each region. It was estimated that, in 1988, \$200,000 was necessary annually to start and operate

a new CIL with \$50,000 per year for each satellite office. Today, those costs are significantly higher.

By 1989, CT had established 5 out of the 8 planned CILs with a combination of state and federal funding. However, in 1993, when the five-year plan was reviewed, no new CILs or satellites were established. Building the capacity of the existing CILs was identified as the immediate funding priority while the expansion of the network remained a long-range goal.

As a result of the 2009 American Recovery and Reinvestment Act (ARRA) funding, CT's DSUs submitted a 2009 letter to the US DOE, RSA stating that as a result of stakeholder input, the SILC and DSUs mutually agreed to seek approval to amend Connecticut's existing SPIL to delay the expansion of independent living services to continue to focus efforts on strengthening the capacity and sustainability of five centers within the existing Connecticut network. A 2004 needs assessment for the SILC by the Center on Aging at the University of Connecticut Health Center determined that given the size of the state of Connecticut, the entire state is served by a Center for Independent Living. However, the degree to which a given town and/or area is underserved tends to rise from the distance of its CIL.

#### 3.2 Expansion of Network

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).

In 2004, after discussion with the existing CILs, it was agreed to increase the base level funding to \$550,000. While Part C funding has been decreased (and now leveled off at \$839,760), state allocations to CILs have been significantly reduced over the past 6 years. The \$550,000 figure was based on operational budgets submitted by the CILs to the SILC and remained a constant unit of the development of the current SPIL in 2005. In 2008, the SILC voted to decrease the base level of funding from \$550,000 to \$300,000.

The lower level of funding was intended to be provisional based on the development of a strategic plan that would address diversification of funding and expansion to underserved communities and populations. Unfortunately, before the strategic planning began, the severe decline in state revenue significantly reduced the ability of the state to fund all programs at their existing level, including but not limited to rehabilitation services.

Subsequently, the state of Connecticut cut \$847 million in spending from the FY '2017 state budget. It's anticipated that further additional state cuts will occur in 2018, as CT is seeing slower than expected revenue growth. It's likely that there will be at least a 10% reduction to the CILs below FY '2017 levels in FY '2018.

For FY '2017, the CILs state \$528,680 funds were reduced by 30% and it is anticipated that the CILs will receive further reductions within FY'2017 and then another state funding cut in the FY '2018 budget.

The instability of state funding results in difficult planning and underscores the need for the SILC and CILs to advocate more aggressively for full funding of the network, as well as to seek alternative resources to advance independent living in the state. The SILC determined that using 2009 American Recovery and Reinvestment Act (ARRA) stimulus funds to establish new CILs was not feasible given current revenue shortfalls. However, a SPIL amendment was submitted in March 2010 (and approved on August 10, 2010) to raise the base level back to \$550,000, which remains the benchmark in this three year state plan.

As stated above, the SILC and the DSUs determined that using ARRA stimulus funds to establish new CILs was not feasible given current revenue shortfalls. However, the base level of \$550,000 remains the benchmark and therefore reestablishes the priority of building organizational capacity of the existing five CILs. The current Part C funds are distributed equally among the five Connecticut CILs.

The 2017-2019 SPIL Committee reviewed current CIL 704 reports, US Census data, 2009-2016 American Community Survey data to determine the underserved areas. In addition, underserved areas were outlined by CIL staff and board members and discussed at the two 2017-2019 SPIL public hearings. CILs will outreach to the following underserved areas:

- 1. Middlesex County and Estuary area;
- 2. Lower Central and Coastal Fairfield County;
- 3. Northeastern CT;
- 4. North Central CT; and
- 5. Northwest, CT.

In the proposed 2017-2019 SPIL, the SILC and its partners will undertake the IL Funding Allocation Model (developed by the Indiana State Independent Living Council) as a planning tool to further identify and quantify the true costs for Connecticut's Independent Living system.

- 3.3 Section 723 States Only
- 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.

N/A

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.

N/A

#### **Part II: Narrative: Section 4 - Designated State Unit (DSU)**

- 4.1 Administrative Support Services
- 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. Refer to the SPIL Instructions for additional information about administrative support services.

The Connecticut Department of Rehabilitation Services (DORS) currently serves as the Designated State Entity (DSE). In July 2012, Gov. Malloy merged the 2 DSEs, the Bureau of Education and Services and the Bureau of Rehabilitation Services into this one DSE, DORS, which maintains two (2) separate State Rehabilitation Councils. DORS provides administrative support to include the contract management and procurement process for the Part B federal funds, consistent with the distribution of funds listed in this SPIL.

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

N/A

## Part II: Narrative: Section 5 - Statewide Independent Living Council (SILC)

#### 5.1 Resource plan

- 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.
  - Refer to the SPIL Instructions for more information about completing this section.

For more information click the icon.

The SILC is an independent Connecticut 501 (c) (3) nonprofit organization. Since 2000, as part of the collaborative partnership between the DSUs and the SILC, DORS has provided the SILC with Federal Innovations and Expansion funds for the SILC resource plan. However, given the extreme CT budget cuts, DORS will only provide one (1) year of Innovations and Expansion funds for the resource plan. \$51,500 will support the SILC resource plan in Year 1 with 30% of funds from SPIL for a total of \$149,654. No Innovation and Expansion funds will be provided for Years 2-3 and therefore, the SPIL seeks approval for 40% of SPIL funds for operating costs for Year 2-3. If approved at 40%, the operating budget for Year 2-3 will be approximately \$115,000 for each year.

A 2017-2019 contract will be developed between DORS and the SILC outlining the SILC roles, responsibilities and monitoring, as mandated by WIOA/the Rehabilitation Act for SILC operations and SPIL implementation of the 2017-2019 SPIL.

This budget supports non-personnel costs to include office supplies, educational materials, interpreters, transportation for SILC members, meeting costs, and insurance, health insurance stipend. The personnel costs will support one (1) full-time Executive Director and a 20 hour Administrative position for Year 1 and then a full-time Executive Director only for Years 2-3.

- 5.1B Describe how the following SILC resource plan requirements will be addressed.
  - The SILC's responsibility for the proper expenditure of funds and use of resources that it receives under the resource plan.

The SILC receives funds through a contract administered by DORS. Proper expenditure of funds is detailed in the contract and monitored through quarterly programmatic and fiscal reports, in addition to an annual audit. The SILC and DSUs meet quarterly to assess and monitor the SPIL income and expenditures by goal. Currently, DORS and the SILC are working on developing a simplified financial spreadsheet that clearly delineates the status of SPIL funds, including the SILC resource plan funds. In addition, the SILC Executive Committee has directed the SILC Ex.

Director work with DORS to create a Memorandum of Agreement (MOA) that outlines the roles and responsibilities related to the SPIL funds and resource plan.

• Non-inclusion of conditions or requirements in the SILC resource plan that may compromise the independence of the SILC.

The SILC is an independent 501(c)(3) Connecticut nonprofit organization. All appropriate policies, procedures and processes are in place to ensure the autonomy of the SILC.

• Reliance, to the maximum extent possible, on the use of resources in existence during the period of implementation of the State plan.

The SILC resource plan is comprised of noncompetitive resources. All resources are anticipated during the period of implementation of the SPIL.

#### 5.2 Establishment and Placement

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies. Refer to the SPIL Instructions for more information about completing this section.

The SILC operates as a 501 (c) (3) nonprofit organization incorporated in the State of Connecticut. Its Board of Directors is representative of volunteers from the disability community and ex-officio membership representing the DSUs. The DSUs are SILC partners, but do not staff the SILC. There is no apparent conflict of interest with the DSU and/or other state agencies.

The SILC is governed by and adheres to its non-profit Articles of Incorporation and by-laws, which includes a conflict of interest and confidentiality policies that all members sign annually. Also, as an incorporated nonprofit, the SILC must abide by the non-profit duty of care, loyalty and fiduciary regulations set forth by the State of Connecticut. The SILC currently holds an office at 151 New Park Avenue in Hartford, CT. However, as a cost saving measure, the SILC will move its office in July 2016 to the University of Connecticut Center of Excellence in Developmental Disabilities (UCEDD), in order to eliminate the SILC's \$20,000 annual office rental costs. The SILC will maintain its autonomy and independent non-profit status, but will be able to directly partner with the UCEDD on current projects (Cross Disability Alliance and Emergency Management training). In addition, the SILC and UCEDD will collaborate to seek grant funding and develop additional joint projects in keeping with the 2017-2019 State Plan for Independent Living.

#### 5.3 Appointment and Composition

Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b). Refer to the SPIL Instructions for more information about completing this section.

Article 3 of the SILC By-Laws states in detail the process for appointing members. The Executive Director, Executive Committee and Board Development Committee take all measures to ensure that requirements for general SILC composition and those individual membership qualifications are met. The SILC Chairperson and Executive Director work in concert with the Board Development and Executive Committees to outreach, solicit and review names of potential members. 1-2 potential board receptions are held annually to invite potential candidates to learn about Independent Living, Centers for Independent Living and the role of the SILC.

A board member application is completed for each potential candidate and reviewed by the Committee to ensure statewide representation, skill set, interests, and representation of individuals with a broad range of disabilities. A board folder is shared with potential members to explain SILC, independent living services and to define board member roles and responsibilities.

The SILC, its agents and any participants in the selection process will ensure the utmost confidentiality of all potential applicants and will practice nondiscrimination in the selection of members. The Board Development Committee presents a slate of candidates to be voted on at a SILC Board meeting. In addition, all candidates will receive a board binder that includes Articles of Incorporation, By-Laws, current SPIL, Personnel and Financial Policies, ILRU history of IL, WIOA/Rehabilitation Act, Board Membership directory, committee assignment and roles and responsibilities, and SILC and SPIL budgets.

The Board of Directors shall act upon the slate of candidates and approve directors throughout the year (if needed) or at the annual September meeting. After Board approval, the Executive Director submits the names of the directors for appointment to the Governor through the office of Boards and Appointments. The Governor shall act upon the slate of candidates and his or her sole discretion.

#### 5.4 Staffing

Describe how the following SILC staffing requirements will be met.

• SILC supervision and evaluation, consistent with State law, of its staff and other personnel as may be necessary to carry out its functions.

The SILC is an independent 501c3 nonprofit organization with a full-time Executive Director and a 20 hr. Administrative Assistant. The organization maintains by-laws, personnel policies and financial policies developed, approved and implemented by the Board of Directors.

The Executive Committee of the Board of Directors, which includes the four (4) Board officers, meets monthly and evaluates the Executive Director annually no later than September 30th. In turn, the Executive Director evaluates the Administrative Assistant annually by the same date. The Executive Committee and Executive Director developed and approved a staff performance tool in 2009 that is used to evaluate both the Executive Director and Administrative Assistant.

The Executive Director responsibilities include executing all organizational business on behalf of the Board, including hiring and supervising all staff, maintaining all administrative and fiscal

controls and policies, and working with the DSE and partners to develop, implement and evaluate the SPIL objectives.

• Non-assignment of duties to SILC staff and other personnel made available by the DSU, or any other State agency or office, that would create a conflict of interest while assisting the SILC in carrying out its duties.

N/A

# Part II: Narrative: Section 6 - Service Provider Requirements

Describe how the following service provider requirements will be met:

#### 6.1 Staffing

• Inclusion of personnel who are specialists in the development and provision of IL services and in the development and support of centers.

All five (5) CILs have qualified staff trained in the IL five core services and the majority of staff and board members are individuals with disabilities. The majority of the CIL executive directors have worked in the IL field since the 1980s and are highly knowledgeable and proficient in the development and implementation of IL services, operating CILs and managing non-profit organizations. In addition, goal 2 was created to further develop the capacity and sustainability of the CILs by developing a professional development training program, in order for staff to keep pace with changes in the IL and non-profit field and continue to be highly trained specialists.

Availability, to the maximum extent feasible, of 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
tapes 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 title VII of
the Act.

All CILs are equipped with staff and technology that allows for communicating with individuals who rely on alternative modes of communication and nonverbal devices. In the 2008-2010 and 2011-2013 SPILs, technology was prioritized and computers and software for both consumers and staff were substantially upgraded to allow CILs to better serve and outreach to consumers. Most of the CILs have staff able to communicate with consumers in their native languages. If this is not available, the CILs partner with local agencies and interpreters to assist consumers.

Establishment and maintenance of a program of staff development for all classes of
positions involved in providing IL services and, where appropriate, in administering the
CIL program, improving the skills of staff directly responsible for the provision of IL
services, including knowledge of and practice in the IL philosophy.

The 2014-2016 SPIL emphasized professional development and training as a priority in order to build, develop and expand the capacity and sustainability of the five (5) CILs. The 2017-2019 SPIL will continue this effort by providing non-profit and IL training, workshops and staff development opportunities for CIL and SILC staff and SILC board members. A survey will be developed to assess the needs of staff and board members and to create workshops and training opportunities to address the needs.

• 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.

All CILs will adhere to affirmative action policies to employ and advance 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 and 34 CFR 364.31.

#### 6.2 Fiscal Control and Fund Accounting

• 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.

The SILC and all five CILs use a Certified Public Accountant (CPA) who adheres to all fiscal controls and fund accounting procedures as necessary for the disbursement and accounting for the Parts B and C of Chapter 1.

In addition, the DSU complies with all state and federal fiscal controls and accounting procedures to ensure proper disbursement of SPIL funds. The DSU and SILC meet regularly to review the income and expenditures for the SPIL funds and we are working to improve our SPIL expenditure tracking by goals and objectives for 2017-2019.

#### 6.3 Recordkeeping, Access and Reporting

• Maintenance of records that fully disclose and document the information listed in 34 CFR 364.35.

The SILC and the five CILs maintain all records in locked and secure locations that fully disclose and document information for recipients of financial assistance, in compliance with 34 CFR 364.35.

• Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate

The CILs and the SILC, in coordination with the DSU, will submit in a timely fashion all annual performance reports, financial reports, and other reports as determined, to the Secretary.

 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.

The CILs and the SILC, in coordination with the DSU, will submit in a timely fashion any and all audits, examinations and compliance reviews for all recipients of financial assistance related to 34 CFR 364.37.

#### 6.4 Eligibility

• 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.

Any consumer with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and the CIL programs, authorized under chapter 1 of title VII of the Act.

 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.

All CILs provide the ability for an individual who may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate.

• 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.

All CILs will adhere to the requirements set forth in 34 CFR 364.51 for the determination of an individual's eligibility for IL services.

• 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.

All CILs apply eligibility requirements, in compliance with 34 CFR 364.41(b), 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.

CILs will 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.

#### 6.5 Independent Living Plans

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.

Independent living services shall be provided by the CILs to all consumers with significant disabilities, in accordance with an independent living plan mutually agreed upon by an

appropriate CIL staff member and the consumer, unless the consumer signs a waiver stating that such a plan is unnecessary.

#### 6.6 Client Assistance Program (CAP) Information

• 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.

The CILs provide information to consumers about Connecticut's CAP and distribute the CAP brochure to all new consumers.

#### 6.7 Protection, Use and Release of Personal Information

• 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 CILs have policies and procedures in place that protect the confidentiality of consumers, to include but not limited to name(s), personal information, photographs, etc.

### **Part II: Narrative: 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.

Section 7: Evaluation

Goal(s) and the related Objective(s) from Section 1	Method that will be used to evaluate
Develop Independent Living opportunities and resources through education.	Process evaluation will be used with all the objectives, which will analyze the development and implementation of the strategies. In addition, individual surveys and evaluations will be used for specific workshops, trainings and activities to measure the areas of success and areas for improvement.
Maintain, sustain and expand the capacity of the five CILs.  Purchase goods and	Process evaluation will be used with Goals 1, 2 and 3. Individual pre and post surveys (if applicable) and evaluations will be used for specific workshops, trainings and activities to measure the areas of success and areas for improvement.
services for consumers who have approved IL plans or waivers.	A consumer survey will be implemented by the SILC in coordination with the CILs in the final year of the SPIL to evaluate consumer satisfaction.
	The SILC and DSE will monitor contracts and deliverables based on progress quarterly, as it relates to the services outlined in the contracts scope of services.

## **Part II: Narrative: Section 8 - State-Imposed Requirements**

8 State-Imposed Requirements

Identify any State-imposed requirements contained in the provisions of this SPIL.

Not applicable.