State Plan for Independent Living (SPIL) for Indiana for 2017-2019

General Information

Designated Agency Identification

State: Indiana

Agency: Indiana Bureau of Rehabilitation Services

Plan for: 2017-2019

Submitted in fiscal year: 2016

View grant <u>90IS0052-01</u> 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.

Per WIOA, the DSU is now DSE which is the Bureau of Rehabilitation Services (BRS).

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.

N/A

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.

Indiana Statewide Independent Living Council (INSILC)

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 Theresa Koleszar, Director, Bureau of Rehabilitation Services.

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.

Yes

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 <u>MS Word</u> and <u>PDF</u> 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

NameChris Cleveland

TitleINSILC Chair

Signed?Yes

Date signed06/08/2016

Section 9: Signature for DSU Director

NameTheresa Koleszar

TitleDirector, Bureau of Rehabilitation Services

Signed?Yes

Date signed06/08/2016

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

Is there a Separate State Agency for Individuals Who Are Blind?No

Name

Title

Signed?No

Date signed

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: Grow the Independent Living Network

Goal Description:

Goal Name:Improve INSILC's organizational and operational effectiveness

Goal Description:

Goal Name:Conduct Systems Advocacy

Goal Description:

1.2 Objectives

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

Goal(s) from	Objective to be achieved	Time frame	Time frame
Section 1.1		start date	end date
Grow the Independent Living Network	 A). Establish at least one new Center for Independent Living (CIL) in an unserved area. Activities: Educate the General Assembly on Independent Living. Arrange meetings for ongoing discussions with DSE. Arrange meeting with consumer grassroots disability groups, DDRS, and legislators. 	10/01/2017	09/30/2019

	4). Conduct outreach and identify existing consumer grassroots disability groups in unserved areas.		
Grow the Independent Living Network	B). Update Demographic Study of People with Disabilities and Funding Formula Allocation Model Strategy for Centers for Independent Living.	10/01/2016	09/30/2017
	Activities:		
	1). Research and request a proposal and scope of work from potential contractors.		
Grow the Independent Living Network	C). Develop and implement Independent Living Outreach and Awareness plan, with an emphasis on unserved areas.	10/01/2016	09/30/2017
	Activities:		
	1). Redevelop and update INSILC website as needed.		
	2). Establish a social media presence with postings.		
	3). Research and request proposals and scopes of work for plan development.		
	4). Design, print, and distribute new marketing materials and update as needed.		
	5). Host Independent Living action track within an Indiana Disability Conference.		
	6). Organize and conduct presentations and educational clinics on IL and disability issues within underserved and unserved areas.		
	7). Present at Indiana conferences, seminars, sessions, and classes on IL and disability issues.		
	8). Organize INSILC marketing database and update as needed.		
Grow the Independent Living Network	D). Conduct a Statewide Needs Assessment of People with Disabilities.	10/01/2016	09/30/2017

	Activities:		
	1). Identify needs of people with disabilities in all areas of the state.		
	2). Identify consumer grassroots disability groups in unserved areas.		
	3). Research and request a proposal and scope of work from potential contractors.		
Grow the Independent Living Network	E). Mentor existing consumer or grassroot disability groups/entities on Independent Living in underserved and unserved areas.	10/01/2016	09/30/2019
	Activities:		
	1). Identify consumer grassroots disability groups in underserved areas seeking IL mentorship.		
	2). Identify CILs willing to provide mentorship to consumer grassroots disability groups in unserved areas.		
	3). Identify potential staff mentors within CILs to provide mentorship.		
	4). Develop mentorship model.		
Grow the Independent Living Network	F). Secure funding for CIL fifth core service - Transition.	10/01/2016	09/30/2019
INCLWOIR	Activities:		
	1). Obtain at least 40,000 dollars in funding annually per CIL for the new fifth IL core service of transition.		
	2). Identify source(s) of transition funding.		
	3). Inform stakeholders of the new fifth IL core service of transition.		
Grow the Independent Living Network	G). Conduct Resource Development for necessary capacity of INSILC operations.	10/01/2016	09/30/2019

]
	Activities:		
	1). Identify additional funding opportunities to increase INSILC capacity and increase the function of the INSILC.		
	2). Obtain funding to support provision of IL services for CILs and consumer goals, services, and activities.		
	3). Increase or maintain number of employees to carry out the functions of the SPIL implementation and evaluation.		
	4). In conjunction with agency support, create and implement an INSILC resource development plan.		
	5). Secure Salesforce account for email and marketing database/platform and update as needed.		
Improve INSILC's organizational and operational	A). INSILC membership reflects Independent Living philosophy.	10/01/2016	09/30/2019
effectiveness	Activities:		
	1). Develop a method for recruiting applicants and receiving applications consistent with the IL philosophy and the requirements of the law.		
	2). INSILC establishes a membership nomination committee to vet applicants.		
	3). Forward a list of qualified, knowledgeable, and diverse candidates for appointment to the Council to the Governor's office for consideration, at least annually.		
	4). Provide training to council members, CILs, other providers, and people with disabilities.		
	5). Complete and Submit an assessment of the Councils training needs to the SILC Technical Assistance Center on an annual basis.		

	6). Develop, implement, and update operational, fiscal, and personnel policies and procedures at least annually.		
	7). Develop, adopt, and control budget and allocate funds consistent with identified priorities at least annually.		
	8). Develop and implement a new member orientation.		
	9). Create a training schedule with topics adjusting as appropriate based on need.		
	10). Create Employee Handbook, personnel policies and procedures, and maintain and update as necessary.		
	11). Meet with the Governor's Office to discuss and determine process for forwarding vetted applicants and appointing members.		
Improve INSILC's organizational and operational effectiveness	B). INSILC fulfills all the duties in Section $705(c)(1)$ regarding the State Plan for Independent Living (SPIL).	10/01/2016	09/30/2019
	Activities:		
	1). Document a process for the development of the SPIL with the CILs.		
	2). Solicit input from people with disabilities and other stakeholders for the development of the SPIL.		
	3). Monitor, review, and evaluate the implementation of the SPIL.		
	4). Collaborate with the CILs to design tools and processes to evaluate implementation of the SPIL and assess consumer satisfaction with services.		
	5). Submit and maintain copies of reports requested by the ACL Administrator.		

Improve INSILC's organizational and operational effectiveness	 C). INSILC documents coordination activities, in the SPIL and otherwise. Activities: Identify entities with which activities are coordinated. 2). Document coordination activities with 	10/01/2016	09/30/2019
Improve INSILC's organizational and operational effectiveness	 identified entities. D). INSILC conducts hearings and forums necessary to carry out its duties. Activities: Notify media, database contacts, and the public of meetings in accordance with Indiana's Open Door Law. Create and establish a hearing and forum schedule. Maintain copies of advanced notice, registration lists, minutes, and other documentation of input gathered at hearings and forums conducted as appropriate. Schedule hearings and forums that are physically accessible. 	10/01/2016	09/30/2019
Improve INSILC's organizational and operational effectiveness	 E). INSILC shall have a resource plan sufficient to carry out the functions of INSILC. Activities: 1). Reallocate funding within the confines of the resource plan total budget based on level of need. 2). Conduct employee performance reviews annually. 3). Maintain personnel records as needed. 	10/01/2016	09/30/2019

	4). Provide oversight of staff and personnel		
	duties to ensure no conflict of interests.		
Conduct Systems Advocacy	A). Educate the General Assembly on Independent Living and Advocate for additional funding.	10/01/2016	09/30/2019
	Activities:		
	1). Organize and conduct IL and Disability Awareness events at the Statehouse.		
	2). Educate the General Assembly utilizing the updated funding formula, demographic study, cost savings report and other pertinent data, and CIL success stories.		
	3). Create issue brief(s) on IL priorities for additional IL funding and share with members of General Assembly.		
Conduct Systems Advocacy	B). Advocate for Individuals with disabilities to have increased access to affordable, accessible, integrated housing.	10/01/2016	09/30/2019
	Activities:		
	1). Provide public input and testimony as appropriate.		
	2). Participate in Indiana Housing and Community Development Authority (IHCDA) Workgroups as appropriate.		
	3). Present and support housing- related trainings, educational seminars, conferences, programs and efforts.		
	4). Educate applicable entities on IL and benefits of visitable and universal design.		
	5). Meet with providers of Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), (HOME), and Continuum of Care (COC) funding.		
	6). Participate on relevant committees, workgroups, focus groups, etc.		

Conduct Systems Advocacy	 C). Advocate for Individuals with disabilities to have increased access and expansion of options to adequate home and community-based supports (HCBS). Activities: Meet with Bureau of Developmental Disability Services (BDDS), Division of Aging (DoA), and Division of Mental Health and Addiction (DMHA). Educate HCBS providers/staff on personcenteredness and consumer choice/direction. Participate on Medicaid HCBS transition plan committee. Participate on relevant committees, workgroups, focus groups, etc. 	10/01/2016	09/30/2019
Conduct Systems Advocacy	 D). Advocate for Individuals with disabilities to have increased options for competitive, integrated, high quality jobs with benefits and opportunities for advancement. Activities: Participate on Employment First committee. Provide Youth Transition mentorship on employment. Provide Technical Assistance for Work One centers for employment of people with disabilities. Connect with one large employer to discuss development of creation for a job referral/training program. Meet with other entities such as VR, Department of Workforce Development (DWD), and Work One centers to discuss collaboration 	10/01/2016	09/30/2019

	with large employer for job referral/training program.6). Participate on relevant committees,		
Conduct Systems Advocacy	workgroups, focus groups, etc.E). Advocate to increase transitions of individuals with disabilities residing in institutional settings into integrated community-based settings.	10/01/2016	09/30/2019
	Activities: 1). Participate in the Medicaid HCBS transition		
	 planning committee. 2). Meet with DoA, Area Agencies on Aging (AAAs)/Aging and Disability Resource Centers (ADRCs), for Money Follows the Person (MFP), No Wrong Door, and Pre-Admission Screening and Resident Review (PASRR) improvements. 		
	3). Meet with Indiana Medicaid Director.4). Participate on relevant committees, workgroups, focus groups, etc.		
Conduct Systems Advocacy	F). Advocate for Individuals with Disabilities to have increased access and options to accessible, affordable transportation.	10/01/2016	09/30/2019
	Activities:		
	1). Collaborate with and support groups/organizations currently working to address transportation barriers impacting people with disabilities. Incorporate these entities in efforts/events when raising awareness of Independent Living.		
	2). Provide public input and testimony as appropriate.		
	3). Educate housing developers, urban/city and rural planners, transportation providers, legislators, etc. on importance of better alignment of transit to affordable, accessible		

	housing, employers, and healthcare supports/services.4). Participate on relevant committees, workgroups, focus groups, etc.		
Conduct Systems Advocacy	 G). Identify and educate private funders/foundations about Independent Living. Activities: Create lists/database of potential funders. 2). Track contact and communication efforts with potential funders. 3). Meet with potential funders. 	10/01/2016	09/30/2019

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

One goal of the SPIL is to conduct a Statewide Needs Assessment and Demographic Study that will help identify unserved and underserved populations that shall be targeted for outreach. In the previous SPIL, targeted populations identified were Hispanic or Latino and African American. An additional goal of the SPIL is for INSILC to develop an Outreach and Awareness plan which will take into account data from the both the Statewide Needs Assessment and Demographic Study to address unserved and underserved areas and populations.

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

While maintaining outreach for current CIL covered catchment areas of the state, preponderance of targeted outreach will be focused on the urban and rural populations in unserved areas of the state.

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

Extra efforts will be made to target minority populations identified in the Statewide Needs Assessment and Demographic Study in unserved and underserved areas. According to the 2015 US Census population estimates, Indiana's population is 6.6 million. Of this total, 9.6 percent are African American and 6.6 percent are Hispanic or Latino. INSILC plans to update their website and establish an INSILC media presence during the span of this SPIL, as indicated in Goal 1, Objective 3, which will provide additional opportunities to target and address the needs of these minority groups.

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.

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B			376866	
Title VII Funds Chapter 1, Part C			1312253	
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)	165000			
Other Federal funds - other			1350972	
Non-Federal funds - State funds			824999	
Non-Federal funds - Other				
Total	165000	0	3865090	0

Year 1 - 2017Approximate funding amounts and uses

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			376866	
Title VII Funds Chapter 1, Part C			1312253	
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)	165000			
Other Federal funds - other			1350972	
Non-Federal funds - State funds			824999	
Non-Federal funds - Other				
Total	165000	0	3865090	0

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			376866	
Title VII Funds Chapter 1, Part C			1312253	
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)	165000			
Other Federal funds - other			1350972	
Non-Federal funds - State funds			824999	

Non-Federal funds - Other				
Total	165000	0	3865090	0

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.

Please note these dollar amounts for each of the three years are an estimate. Due to economic downturn in Indiana, budget decreases may need to be made. Indiana uses the 10% match for the same purpose as the federal 90% funding, i.e. operational support.

INSILC Resource Plan - The INSILC Resource Plan will be funded using VR Title 1 Innovation & Expansion (I&E) funds. (Projected at approximately 165,000 dollars per year.) These funds will be used for the INSILC to meet its basic obligations under Title VII. The funds will be used to obtain INSILC administrative and/or fiscal support services, staff support, equipment, supplies, conduct INSILC member and staff development activities, identify new CIL geographic services areas, identify priorities for the strengthening and/or expansion of the network of Indiana CILs, web page development/support needed to conduct outreach, gather information, revise policies and procedures, present information as associated with the SPIL goals and objectives, and conduct other activities in order to enhance independent living services for individuals with disabilities. Any funds not used by the INSILC in any specific fiscal year will be carried over to the next fiscal year for uses consistent with this plan.

GOAL 1: Grow the Independent Living Network

Objective A: Establish at least one new Center for Independent Living (CIL) in an unserved area.

Funding Source: Combination of Available Part B Funds, Additional Part C Funds, if made available, Private Funding and Available State Funding

Objective B: Update demographic study of people with disabilities and funding formula allocation model strategy for Centers for Independent Living.

Funding Source: VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective C: Develop and implement an Independent Living outreach and awareness plan with an emphasis on unserved areas.

Funding Source: VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective D: Conduct a statewide needs assessment of people with disabilities.

Funding Source: VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective E: Mentor existing consumer grassroots disability groups on Independent Living in underserved and unserved areas.

Funding Source: Combination of Part C and/or Part B Funds and VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective F: Secure funding for Independent Living fifth core service of transition.

Funding Source: Combination of Part C and/or Part B Funds and Available State Funds

Objective G: Conduct resource development for necessary capacity of INSILC operations.

Funding Source: VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

GOAL 2: Improve INSILC's organizational and operational effectiveness.

This goal and its objectives and activities utilizes Innovation & Expansion (I&E) funding (identified as other Federal Funds per Sec. 101(a)(18) of the Act) will be used to address this goal, objectives, and activities.

GOAL 3: Conduct Systems Advocacy

Objective A: Educate the General Assembly on Independent Living and advocate for additional funding.

Funding Source: Combination of Part C and/or Part B Funds and VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective B: Advocate for individuals with disabilities to have increased options to affordable, accessible, integrated housing.

Funding Source: Combination of Part C and/or Part B Funds and VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective C: Advocate for individuals with disabilities to have increased access and expansion of options to adequate home and community-based supports.

Funding Source: Combination of Part C and/or Part B Funds and VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective D: Advocate for individuals with disabilities to have increased options for competitive, integrated, high-quality jobs with benefits and opportunities for advancement.

Funding Source: Combination of Part C and/or Part B Funds and VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective E: Advocate to increase transitions of individuals with disabilities residing in institutional settings into integrated, community-based settings.

Funding Source: Combination of Part C and/or Part B Funds and VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective F: Advocate for Individuals with disabilities to have increased access and options to accessible, affordable transportation.

Funding Source: Combination of Part C and/or Part B Funds and VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

Objective G: Identify and educate private funders/foundations about Independent Living.

Funding Source: Combination of Part C and/or Part B Funds and VR Innovation & Expansion (I&E) Funds dedicated to INSILC operations.

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.

Part C funds: 1,312,253 (Each Year - Approximate)

Part B funds: 376,866 (Each Year - Approximate)

SSA/VR funds: 1,350,972 (Each Year - Approximate)

State Line Item funds: 824,999 (Each Year - Approximate)

Coordination of these funds will be used for general CIL Operations - CILs will be funded through a combination of Part C funds (projected at 1,312,253 dollars per year), Part B funds (projected at 376,866 dollars per year), State funding (projected at 824,999 dollars per year, see note, below [legislated allocation] and Other Federal Funds (projected at 1,350,972 dollars per year). The intent of funding from all of these sources is to support the general operation of CILs for provisions of the five core services. The DSE will provide additional funding to the CILs to support the cost of transition services as funding becomes available and approved by the BRS Director.

NOTE: The Indiana General Assembly allocated specific amounts of state funds for seven specific CILs in FY 16 and 17. The annual amounts designated for each of these seven identified CILs are as follows:

accessABILITY - 87,665 dollars per year

ATTIC, Inc. - 87,665 dollars per year

Future Choices, Inc. - 158,113 dollars per year

Independent Living Center of Eastern Indiana, Inc. - 158,113 dollars per year

Southern Indiana Center for Independent Living (SICIL) - 87,665 dollars per year

The Wabash Independent Living and Learning Center, Inc. (The WILL Center) - 158,113 dollars per year

The League - 87,665 dollars per year

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.

The DSE assists in arranging monthly INSILC and ad hoc meeting space within in the Indiana Government Center, located in Indianapolis, IN.

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

No additional information available.

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.

All goals and objectives of this document are consistent with and further the purpose of the Act as stated in section 701.

For example:

Promotion of the IL philosophy is exhibited by Goal 2, Objective A.

Maximization of leadership, empowerment, independence, and productivity of individuals with disabilities is exhibited in Goal 1, Objective 5

Promotion of integration and full inclusion of individuals with disabilities into the mainstream of American society is exhibited by Goal 3, Objectives D, E, and F.

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.

INSILC and the majority of the CIL Directors jointly developed this SPIL document. The CILs are also represented by a Center Director on INSILC. This Center Director was the chair of the SPIL Development Committee which also consisted of another Center Director. Also, the DSE participated in SPIL workgroups and collaborated and provided input into the plan. Members of the Council, CIL Directors, disability organizations, other stakeholders, and people with disabilities were invited to participate in three SPIL workgroups to provide input into the SPIL; the Goals and Objectives workgroup, Resource Plan workgroup, and Evaluations and Outcomes workgroup. CIL Directors and staff also provided input for SPIL development at a public hearing held in Indianapolis.

A draft of this SPIL 2017-2019 was posted for written public comment (via standard mail and/or email) April 22-May 10, 2016 and an additional public hearing was hosted in Indianapolis for further input into this draft on May 2, 2016. A release of notification to provide public input was sent to members of the Council, CIL Directors, and various other organizational partners, people with disabilities and other stakeholders, as well as, posted to the INSILC and the State of Indiana websites along with information on how to participate in providing public input on this SPIL.

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.

Knowledge gained and shared in working with the following entities will be collected over the life of this plan and used to assist with its implementation and evaluation and aid in guiding the development of the next state plan.

The SILs program, INSILC, and CILs:

Efforts to maximize the cooperation, coordination, and communication amongst these entities will be an ongoing endeavor of this new SPIL in order to enhance and expand resources for the Council, CILs, and people with disabilities in Indiana.

The DSE, other state agencies represented on INSILC, and other Councils and Commissions that address the needs of specific disability populations and issues:

The Indiana Division of Disability and Rehabilitative Services (DDRS) and INSILC will work in cooperation and coordination to strengthen relationships in relation to specific disability areas within the Bureau of Rehabilitation Services, which includes Vocational Rehabilitation Services, Blind and Visually Impaired Services, and Deaf and Hard of Hearing Services. In addition to these, the DSE and INSILC will strive to work with other agencies that provide services to individuals with disabilities such as Indiana Disability Rights (formally Indiana Protection & Advocacy Services - IPAS), the Division of Aging, Bureau of Developmentally Disabled Services (BDDS), and Department of Transportation (DOT).

The CILs are a natural resource for other support systems in the field of independent living services. INSILC and the CILs provide opportunities of support services that the Commission on Rehabilitation Services and VR can often not address for people with significant disabilities. The INSILC Chair has a standing appointment to represent INSILC at Commission meetings. CIL staff are also members of the Commission, as is, the INSILC Executive Director, representing as a person with a significant disability. The continued communication between the VR Commission on Rehabilitation Services, INSILC, and CIL staff will aid in reducing systemic obstacles and duplication of efforts/services in an endeavor to increase self-discipline, self-sufficiency, and empowerment of people with disabilities to manage successful personal outcomes.

Other public and private entities determined by INSILC:

INSILC will also take strides to work with the Department of Education (DOE), Office of Medicaid Policy and Planning (OMPP), Indiana Housing and Development Authority (IHCDA), Department of Mental Health and Addiction (DMHA), Area Agencies on Aging (AAAs), the Aging and Disability Resource Centers (ADRCs), the ARC of Indiana, Department of Workforce Development (DWD), Indiana Department of Veterans Affairs (IDVA), and other public and private entities.

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 Bureau of Rehabilitation Services (BRS) brings Vocational Rehabilitation (VR), Deaf and Hard of Hearing Services, Independent Living Services and Blind and Visually Impaired Services together under one leadership, including the Older Independent Blind (OIB) program. BRS is a part of the Family and Social Services Administration (FSSA) that houses most social service departments for the State of Indiana. BRS as the Designated State Entity (DSE) develops and designs policies, projects, grants and activities with the involvement of partners i.e.: CILs, INSILC, VR Commission, other social service entities, consumers and field staff. The DSE has a clear understanding of each of these agencies and partner services. Blind & Visually Impaired Services administers the OIB program through contractual obligations with non-profits, Independent Living Centers, rehabilitation facilities, and other state agencies. The OIB program works in partnership with other community services to provide support where the elderly blind are unserved or underserved. Due to the narrow focus and unique training skills required of the OIB program the possibility of duplication of services is low.

In keeping with the requirements of 364.27, services will be coordinated and complement services provided by State and local agencies administering special education, vocational education, developmental disability services, public health, mental health, housing, transportation, and veteran programs, and the programs authorized under Titles XVIII through XX of the Social Security Act within the State.

The SPIL has identified as an objective developing a plan to bolster INSILC membership (with an emphasis on recruitment of people with significant disabilities) but also recognizes the importance of coordinating efforts to avoid duplication of services. Therefore, INSILC consists of representatives from Indiana Disability Rights (formally known as IPAS), Department of Transportation (DOT), Bureau of Developmentally Disabled Services (BDDS), and Bureau of Rehabilitation Services (BRS) to further ensure coordination of services. INSILC will continue to incorporate membership representing Federal, State and Local programs addressing the needs of people with disabilities while still maintaining consumer control of the Council. When appropriate, INSILC will also present and exhibit at conferences, events, workshops, etc. to educate stakeholders and seek new membership. Stakeholders will continue to be invited to participate on INSILC committees and provide input regarding SPIL evaluation and development of the future SPIL. Council members and the INSILC Executive Director will also participate on committees, commissions, workgroups, and focus groups, etc. beyond INSILC's to further coordination of services for people with disabilities, as well as, present on IL and disability-related issues at conferences, seminars, sessions, etc.

Each CIL has specific relationships with service providers in their areas and coordinates services with these providers depending upon the particular need of the population at any given point in time. Some of this coordination centers around Housing, Transition, Youth, Special Education, Transportation, Veteran and Blind services.

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.

Five of the nine CILs receive OIB funding for provision of IL services. The DSE is contracted with Easter Seals Crossroads to provide training and support to enhance CIL staff capacity and capability.

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	No	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)	No	Yes	Yes
Rehabilitation technology	No	No	No
Mobility training	No	Yes	Yes
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	No	Yes	Yes

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

Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	No	Yes	Yes
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	No	Yes	Yes
Other necessary services not inconsistent with the Act	No	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.

This SPIL addresses objectives pertaining to housing, employment, transition, home and community-based services/supports (HCBS), and transportation.

In light of the new Workforce Innovation and Opportunity Act (WIOA) requirements regarding transition services being a new core requirement for CILs, INSILC has specified transition services as a top priority request for additional funding from the State. The DSE will provide additional funding to the CILs to support the cost of transition services as funding becomes available and approved by the BRS Director.

Additional service provision priorities will be determined based on the updated Statewide Needs Assessment and Demographics Study.

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.

N/A

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 DSE provides grants and contracts pursuant to state procurement regulations for IL services via third parties, i.e. Centers for Independent Living, for general CIL operations based on the SPIL. Contracts will be developed for a maximum of a 24-month period of time with contract outcomes developed jointly between the DSE and the CIL Directors.

These grants/contracts with CILs will consist of a combination of Part B funds (projected at \$376,866 per year), State Line Item funding (projected at \$824,999 per year) and Other Federal Funds (projected at \$1,350,972 per year.)

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 grants/contracts between the DSE and the CILs state the CILs are required to maintain a consumer service record that includes materials and information as required by 34 CFR 364.53. The eligibility of services shall also be determined by each Center as required by 34 CFR 364.51.

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 Network of Centers for Independent Living is comprised of Centers for Independent Living that are consumer-controlled, community-based, cross-disability, non-residential, private nonprofit organizations that are designed and operated within local communities by a majority of individuals with disabilities, and provide an array of IL services, regardless of funding (see RSA Policy Directive RSA-PD-03-06). Centers in the network, including those that do not receive Part C funding, meet the standards and assurances in section 725 (b) and (c) of the Rehabilitation Act of 1973, as amended. The 2014 American Community Survey was used to identify the percentage of people with disabilities in the existing networks catchment areas.

ATTIC is located in Vincennes and serves Davies, Dubois, Gibson, Greene, Knox, Martin, Pike, and Sullivan counties (Southwest). These are all rural counties. Consequently, the population served by the Center is people from rural areas. There are 30,319 people with disabilities (13.92 percent of the total population) in this geographic area. The Center also serves a larger proportion of individuals who have cognitive and physical disabilities. Funding sources include Part C, Part B, other state funds, private sources, and other Federal funds.

Everybody Counts is located in Merrillville and serves Lake and Porter counties (Northwest). These are urban counties. There are 84,676 people with disabilities (12.94 percent of the total population) in this geographic area. The Center also serves a larger proportion of individuals who are African American. Funding sources include Part C, Part B, and other Federal funds.

Everybody Counts North (formerly known as Indiana F.A.C.E.S) is located in Merrillville and serves Lake and Porter counties (Northwest). These are urban counties. There are 84,676 people with disabilities (12.94 percent of the total population) in this geographic area. This center is based in East Chicago & serves the surrounding areas with particular outreach to the Hispanic/Latino. Funding sources include Part C, Part B and other Federal funds.

accessABILITY is located in Indianapolis and serves Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, and Shelby counties (Central). Four of these are rural counties and all are located in the Indianapolis metropolitan area. There are 191,474 people with disabilities (11.21 percent of the total population) in this geographic area. The Center serves a larger proportion of individuals who are Hispanic/Latino and African American. It also serves a larger proportion of people who have vision loss and physical disabilities. Funding sources include Part C, Part B, other state funds, other private sources, and other Federal funds.

The League (formerly the League for the Blind and Disabled) is located in Fort Wayne and serves Adams, Allen, DeKalb, Huntington, Jay, Kosciusko, LaGrange, Noble, Steuben, Wells and Whitley counties (Northeast). Ten of these are rural counties. There are 88,678 people with disabilities (11.94 percent of the total population) in this geographic area. The Center serves a larger proportion of individuals who are African American. It also serves a larger proportion of people who have cognitive, physical, and vision related disabilities. Funding sources include Part C, Part B, other state funds, other private sources, and other Federal funds.

Southern Indiana Center for Independent Living (SICIL) is located in Bedford and serves Bartholomew, Brown, Crawford, Lawrence, Jackson, Monroe, Orange, and Washington counties (South Central). Seven of these are rural counties. There are 48,247 people with disabilities (12.3 percent of the total population) in this geographic area. The Center serves a larger proportion of individuals who have physical disabilities. Funding sources include Part C, Part B, other state funds, other private sources, and other Federal funds.

Future Choices is located in Muncie and serves Blackford, Delaware, Grant, Howard, Madison, Randolph, and Tipton counties. Five of these are rural counties. There are 75,761 people with disabilities (16.98 percent of the total population) in this geographic area. The Center also serves a larger proportion of individuals who have cognitive and physical disabilities. Funding sources include Part B, other state funds, other private sources, and other Federal funds.

Independent Living Center of Eastern Indiana (ILCEIN) is located in Richmond and serves Decatur, Fayette, Franklin, Henry, Rush, Union, and Wayne counties (East Central). These are all rural counties. There are 33,765 people with disabilities (15.48 percent of the total population) in this geographic area. Funding sources include Part B, other state funds, other private sources, and other Federal funds.

The Wabash Independent Living & Learning Center (The WILL Center) is located in Terre Haute and serves Clay, Owen, Parke, Putnam, Vermillion, and Vigo counties (West Central). Five of these are rural counties. There are 34,483 people with disabilities (15.92 percent of the total population) in this geographic area. The Center serves a larger proportion of individuals who have physical and vision related disabilities. Funding sources include Part B, other state funds, other private sources, and other Federal funds.

A map of the existing network can be found here.

SPIL SIGNATURES

All eight Indiana Center for Independent Living Directors were provided the opportunity to sign the SPIL 2017-2019 during the INSILC Monthly Meeting held on May 11th, 2016. All of the Center Directors with the exception of one chose to do so. These Centers/Directors are as follows:

ATTIC - Rebecca Anderson

accessABILITY - Tammy Themel

The League - David Nelson

Southern Indiana Center for Independent Living (SICIL) - Teresa Reynolds

Future Choices - Beth Quarles

Independent Living Center of Eastern Indiana (ILCEIN) - Jim McCormick

The WILL Center - Peter Ciancone

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).

1 - Unserved

There are 35 counties in Indiana that are unserved by a Center for Independent Living (CIL). These counties are located in the North Central, Northwest, Southeast, and Southern Ohio River regions of the state and include Benton, Carroll, Cass, Clark, Clinton, Dearborn, Elkhart, Floyd, Fountain, Fulton, Harrison, Jasper, Jefferson, Jennings, LaPorte, Marshall, Miami, Montgomery, Newton, Ohio, Perry, Posey, Pulaski, Ripley, Scott, Spencer, Starke, St. Joseph, Switzerland, Tippecanoe, Vanderburgh, Wabash, Warren, Warrick, and White counties.

2 - Underserved

Much like funding allocation strategies used successfully in education and other areas of public policy, Indiana developed and utilizes a Formula Funding Allocation Model for Indiana's Centers for Independent Living (CILs) as the strategy for estimating the amount of funding a particular county needs to fully fund CIL services based on each county's unique demographic and economic profile. The Indiana funding formula model uses three indices to identify the appropriate amount of funding needed to fully fund CIL services in each county of the state. These three basic indices include a Service Index, Worker Disability Index, and an Economic Distress Index. The indices are designed to capture a wide range of data that reflects the level of need that people with disabilities have for Center IL services in each county. Types of data captured include the number of people with disabilities, the economic distress level of the county, the number of people who have disabilities that impact their ability to work, total population of the county, total employment, land area in square miles, total working age population, age and gender of the population of people with disabilities, job density of the county, and unemployment rates.

If counties and CIL geographic areas are fully funded, as indicated by the formula, they are considered to be fully served. Conversely, counties and CIL geographic areas that are not fully funded are considered underserved. This approach also provides an indication as to the degree

that specific counties or CIL geographic areas are underserved by comparing the existing amount of CIL funding in an area to the full amount of funding needed.

According to the current Indiana Funding Formula, all geographic areas served by existing Centers for Independent Living (CILs) are not fully funded and are therefore determined to be underserved to varying degrees. These underserved counties (not in priority order) include: Adams, Allen, Bartholomew, Blackford, Boone, Brown, Clay, Crawford, Daviess, Decatur, DeKalb, Delaware, Dubois, Fayette, Franklin, Gibson, Grant, Greene, Hamilton, Hancock, Hendricks, Henry, Howard, Huntington, Jackson, Jay, Johnson, Knox, Kosciusko, LaGrange, Lake, Lawrence, Madison, Marion, Martin, Monroe, Morgan, Noble, Orange, Owen, Parke, Pike, Porter, Putnam, Randolph, Rush, Shelby, Steuben, Sullivan, Union, Vermillion, Vigo, Wayne, Washington, Wells and Whitley counties.

Per this SPIL - Goal 1, Objective B states the Indiana Funding Formula Allocation Model will be updated which will aid in the design for further expansion of the network.

3 - Design for Further Expansion of the CIL Network

The design for expansion will be established by INSILC. INSILC will develop a plan for expansion for a statewide network of Centers utilizing existing and newly generated data to address unserved and underserved counties.

To develop the design for a statewide network, the Council will examine:

- Updated demographic statistics of people with disabilities
- Updated statewide needs assessment data
- Results from the updated Indiana Formula Funding Allocation Model for Indiana's Centers for Independent Living that incorporates a wide variety of county specific factors
- Review and, as needed, revise the map of future Statewide Network of Centers

To establish a new Center for Independent Living (CIL) in Indiana, adequate funds need to be available to provide and maintain the IL five-core services and meet the standards and assurances of a Center for Independent Living (CIL).

4 - Order of Priority

Once again, INSILC will utilize existing and newly generated data to establish the order of priority of new CILs in unserved areas. Additionally, INSILC determines the distribution of funding for new and existing CILs.

Existing data has identified Southeast Indiana as the highest priority unserved area.

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 Director of Specialized Services and Support Programs for the BRS serves as liaison to INSILC and CILs on behalf of the Director of BRS. This position responds to the Council and ACL in a timely manner, meeting all deadlines. The DSE's Program Director of Independent Living Services provides administrative support for all grant and contracts and data information for reporting purposes like electronic submission of the Council approved 704 report and SPIL. The Program Director of Independent Living Services, who reports to the Director of Specialized Services and Support Programs, reviews reports submitted by the CILs, and, upon request, researches and reviews the laws and regulations pertinent to Indiana's IL program for clarification and implementation. The Director of Specialized Services and Support Programs for compliance with the Indiana IL State Plan as well as State and Federal requirements.

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 resource plan provides funds for each of the three years in the SPIL to carry out INSILC activities necessary to achieve SPIL goals and objectives founded on Title VII, Section 705(c) of the Act. The funds are budgeted annually with Innovation and Expansion (I&E) funds for this purpose and covers the cost of items such as INSILC personnel and operating costs. General personnel and operating costs include, but are not limited to:

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-fontfamily:Symbol">- Personnel salary for INSILC Executive Director and part-time Administrative Staff

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">· Travel and stipend reimbursement

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">· Training expenditures

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">-> Personal care attendants for INSILC members

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">>> Office leasing space and utilities

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">• Outreach expenditures

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">> Website maintenance

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">· Fiscal intermediary fees

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">· Assistive technology and Interpreters

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">> Equipment and supply expenditures

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">> Membership fees

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-font-family:Symbol">> Conference fees

font-family:Symbol;mso-fareast-font-family:Symbol;mso-bidi-fontfamily:Symbol">· Special projects (includes: Statewide Needs Assessment, Demographic Study, Funding Formula Update, etc.)

The total INSILC budget for each year of the SPIL is 165,000 dollars.

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.

INSILC determines its annual budget for all resources allocated for its operation. INSILC will provide quarterly financial reports at its meetings, in order to publicly account for resources and expenditures. The INSILC Treasurer, Chair and Executive Director will be responsible for monitoring all expenditures submitted to, and paid by, the DSE, via the fiscal intermediary, as per INSILC Policies and Procedures. The DSE will process all claim expenditures approved by INSILC in accordance with federal and state financial guidelines.

Per a Memorandum of Agreement and State contract, INSILC's fiscal intermediary oversees the appropriate disbursement of funds based on INSILC's direction and approval to support the operation of INSILC and ensures compliance with state and federal law and accompanying regulations. At the direction of INSILC, the fiscal intermediary ensures a proper accounting system is in place to support the resource plan. The fiscal intermediary also submits finalized expenditure requests to the INSILC Chair, Treasurer, and Executive Director prior to payment of invoices and submits a comprehensive monthly financial report to the INSILC Treasurer, Chair, and Executive Director prior to INSILC meetings.

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

IC 12-12-8-6(a) states explicitly, "The Council is not a part of a state agency." To ensure INSILC's independence, the DSE has executed a contract with a fiscal intermediary to serve as a conduit through which agency funding for the council will flow. How that funding is allocated or apportioned is left entirely to the discretion of INSILC. Even as to matters such as travel

reimbursement, INSILC need not seek permission from the DSE, DDRS, or FSSA. The INSILC will, however, follow state procedures such as the IDOA out-of-state travel request process and per diem rates, as well as in-state travel and per diem rates.

No conditions or requirements are stated or implied in the INSILC resource plan that may compromise the independence of INSILC, as per the INSILC Bylaws, and INSILC Fiscal and Operating Policies and Procedures. The purpose of these policies and procedures are to establish basic guidelines under which INSILC conducts its business.

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

INSILC shall comply with any and all federal and state laws and regulations regarding its fiscal management. Inherent in the SILC by-laws and policies is a commitment by the SILC to comply with 34 CFR 364.21 (i) (2) requirements for the SILC to further the philosophy of independent living to the maximum extent possible.

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.

Indiana has established a SILC that meets the requirements of section 705 of the Act in accordance with 34 CFR 364.21 (a), (2). Therefore, INSILC is eligible to receive assistance under Chapter 1 of Title VII of the Act, as amended.

INSILC is the Indiana Statewide Independent Living Council (INSILC). Its enabling statute is found at IC 12-12-8-6, which, in turn, is found in IC 12-12-8 (Chapter 8. Centers for Independent Living). The enabling section and the sections that follow it establish the composition and diversity of the council, who appoints council members, how they are reimbursed, the terms and limitations of council members, and the powers as well as the duties of council members. The enabling statute closely tracks the federal regulations. In fact, IC 12-12-8-4 Sec. 4 (a) specifies that any provision of this chapter that violates a federal law or federal regulation is void.

IC 12-12-8-6 - Establishment of statewide independent living council; membership; requirements

Sec. 6. (a) There is established a statewide independent living council. The council is not a part of a state agency.

(b) The council consists of at least eleven (11) members appointed by the governor, including the following:

(1) At least one (1) director of a center for independent living located in Indiana chosen

by the directors of the centers for independent living located in Indiana.

(2) Nonvoting members from state agencies that provide services for individuals with disabilities.

- (3) Other members, who may include the following:
- (A) Representatives of centers for independent living.
- (B) Parents and guardians of individuals with disabilities.
- (C) Advocates for individuals with disabilities.
- (D) Representatives from private business.
- (E) Representatives of organizations that provide services for individuals with

disabilities.

- (F) Other appropriate individuals.
- (c) The members appointed under subsection (b) must:
- (1) provide statewide representation;
- (2) represent a broad range of individuals with disabilities from diverse backgrounds;
- (3) be knowledgeable about centers for independent living and independent living

services; and

- (4) include a majority of members who:
- (A) are individuals with disabilities; and
- (B) are not employed by a state agency or a center for independent living.

As added by P.L.217-2005, SEC.14. Amended by P.L.1-2006, SEC.185; P.L.141-2006, SEC.52; P.L.182-2009(ss), SEC.298.

IC 12-12-8-7 - Salary per diem

Sec. 7. (a) Each member of the council who is not a state employee is entitled to the minimum salary per diem provided by IC 4-10-11-2.1(b). The member is also entitled to reimbursement for traveling expenses as provided under IC 4-13-1-4 and other expenses actually incurred in connection with the member's duties as provided in the state policies and procedures established by the Indiana department of administration and approved by the budget agency.

(b) Each member of the council who is a state employee is entitled to reimbursement for traveling expenses as provided under IC 4-13-1-4 and other expenses actually incurred in connection with the member's duties as provided in the state policies and procedures established by the Indiana department of administration and approved by the budget agency.

As added by P.L.217-2005, SEC.15.

IC 12-12-8-8 - Terms of council members; limitation

Sec. 8. (a) A member appointed to the council by the governor serves a term of three (3) years, beginning on July 1 after appointment. However, a member appointed to fill a vacancy on the council serves for the remainder of the unexpired term.

(b) A member appointed to the council by the governor may not serve more than two (2) consecutive terms.

As added by P.L.217-2005, SEC.16.

IC 12-12-8-9 - Appointment to fill vacancy on council

Sec. 9. If a vacancy occurs among the voting members of the council, the original appointing authority shall appoint a qualified individual to serve for the unexpired term of the vacating member.

As added by P.L.217-2005, SEC.17.

IC 12-12-8-10 - Powers and duties of council; public access to meetings

Sec. 10. (a) The council has the powers and duties specified in this chapter.

(b) The council may do the following:

(1) Jointly develop and sign the state plan in conjunction with the designated state unit.

(2) Monitor, review, and evaluate the implementation of the state plan.

(3) Coordinate activities with the state rehabilitation council and other councils that

address the needs of specific disability issues.

(4) Submit periodic reports to the funding sources and provide access to the records that

are necessary to verify contents of the reports.

(5) Do other things necessary and proper to implement this chapter.

(c) The council shall ensure that all meetings of the council are open to the public and in accessible formats with sufficient advance public notice.

As added by P.L.217-2005, SEC.18.

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.

To be considered for appointment to INSILC, interested parties must complete the Application for Gubernatorial Appointment to a Board or Commission. This application is posted on the INSILC website www.insilc.org.

The completed application (including all requested information and supporting documentation) are to be mailed to INSILC at P.O. Box 801, Danville, Indiana 46122 or emailed to info@insilc.org. INSILC's membership nomination committee will review and vet applicants. Applicants will be asked to interview with this committee. Committee recommended applicant applications will be forwarded to the Executive Committee for their concurrence and then to the Executive Director who will then forward to the Governor's Office. Applicants will be required to complete a Consent for Release of Information form and any other necessary documents required by the Governor's Office. All potential members must pass background checks and be able to travel to attend monthly meetings.

The Governor's office will make the final determination and appointment to INSILC.

The INSILC Executive Director will provide orientation to new members to discuss their roles and responsibilities in relation to the business of the Council and the understanding of these.

In accordance with IC 12-12-8-6, INSILC membership shall be no less than 11 members which are gubernatorial appointments. Members must include the following: At least 1 director of a center for independent living located in Indiana chosen by the directors of the centers for independent living located in Indiana and other members who may include representatives of centers for independent living, parents and guardians of individuals with disabilities, advocates for individuals with disabilities, representatives from private business, representatives of organizations that provide services for individuals with disabilities and other appropriate individuals. Members must provide statewide representation and represent a broad range of individuals with disabilities from diverse backgrounds that are knowledgeable about centers for independent living and the independent living philosophy. The council must include a majority

of members who are individuals with significant disabilities and are not employed by a state agency or a Center for Independent Living. Terms are for 3 years and members may not serve more than two consecutive terms. The governor may also appoint a number of nonvoting members from state agencies that provide services for individuals with disabilities.

INSILC encourages interested parties to attend a meeting and/or participate on a Council committee as a member of the public to gain a better understanding of the Council and its works prior to applying for membership/appointment.

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.

INSILC has oversight and directs the activities of the Executive Director while carrying out his/her duties. According to the INSILC bylaws, the Council Chair acts as the immediate supervisor of the Executive Director and as such will evaluate the employment outcomes via an annual performance appraisal.

• 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.

The DSE has designated the Director of Specialized Services and Support Programs to be on INSILC. The DSE's Program Director of Independent Living Services (15% FTE) will provide internal administrative functions, i.e. processing INSILC monthly claims, arranging for meeting rooms in the Government Center complex, providing contract support and reporting i.e. 704 report and monitoring CILs, etc.

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.

The CILS within Indiana have at least 51% of staff who have disabilities. The job descriptions for personnel in decision-making positions and staff positions include the expectation that they will be knowledgeable about the philosophy of independent living, and the provision of independent living services. The Federal Review Instrument for Centers for Independent Living in Indiana includes criteria to review CILs personnel and their qualifications.

The DDRS/BRS IL program policies and procedures have a section that includes general policies relating to the operation of Indiana CILs/SILS. These policies state that all Indiana CILS must comply with the Standards and Assurances set forth in Section 725 of the Rehabilitation Act, that all CILs must have their own policies and procedures, and, that a referral made by the DSE to any CIL will include specific information.

• 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.

Personnel in decision-making and staff positions located at CILs must be able to communicate with individuals with significant disabilities as part of the job expectation. The Federal On-Site Review Instrument for Centers for Independent Living in Indiana includes criteria regarding equal access.

• 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.

CILs are required to assure that the needs of staff are met, including staff development and training. The CILs also provide Governing Board training and development sessions/programs. The Indiana On-Site Review Instrument for Centers for Independent Living in Indiana includes criteria for staff development and training.

• 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.

Each CIL in Indiana must take affirmative action to employ and advance in employment qualified individuals with significant disabilities. The Indiana On-Site Review Instrument for Centers for Independent Living in Indiana includes criteria regarding affirmative action/non-discrimination.

Included in the individual contracts to each of the CILs in Indiana are terms and conditions, including, but not limited to, information regarding: Duties of the contractor, which includes the provision of IL services consistent with 34 CFR 364.50, 364.51 and other pertinent sections of parts 364 and 365 of title 34 of the CFR; Term of the contract, which includes the effective start and end dates; and Compliance with Laws, which states that the CILs shall comply with all applicable federal, state and local laws, rules, regulations and ordinances, etc.

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 grants and contracts that the DSE have with each of the CILs receiving state funds for the provision of services have boilerplate language that accounting records are kept, fiscal reports are completed and procedures are followed to assure expenditures are consistent with the approved budget of the CILs. Reviews of Indiana CILs will use the Federal Review Instrument for Centers for Independent Living.

6.3 Recordkeeping, Access and Reporting

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

The CILs receiving state funds for the provision of services keep records that include:

(1) The amount and disposition by the recipient of that financial assistance;

(2) The total cost of the project or undertaking in connection with which the financial assistance is given or used;

(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 of title VII of the Act and this part; and

(5) Other records that may be determined to be appropriate to facilitate an effective audit.

The Federal Review Instrument for Centers for Independent Living in Indiana includes criteria regarding the above.

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

The contract between the DSE and the CILs include the expectation that performance and financial reports be submitted in a timely manner.

• 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 contract boilerplate includes auditing expectations.

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.

The CILs are responsible for the eligibility of consumers who seek services from their organizations. Indiana will use the Federal Review Instrument to monitor CILs. (Only those that are eligible are served).

• 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 information and referral services. An individual who is seeking services from a CIL can request information on the services requested, and the services provided or arranged for them. This is then part of the Indiana On-Site Review Instrument for Centers for Independent Living in Indiana.

• 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.

The contracts that the CILs have with the DSE include language in regard to duties of the contractor being consistent with 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.

The CILs, do not deny services to persons on the basis of their race, color, national origin, gender, sexual orientation, age or the existence of a disability.

• 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 who are present in the state, who are otherwise eligible for IL services can access CILs for 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.

The contracts that CILs have with the DSE include this language/ this requirement.

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.

Use of accessible formats to notify individuals seeking or receiving IL services under Chapter 1 of Title VII about the requirements verbal and written notification of consumers about the availability of the Client Assistance Program (CAP) at application, service plan development, case closure or disagreement over services; the purposes of services provided under CAP (information/referral, advocacy, technical assistance, conflict resolution, legal and advocacy representation and assistance at appeal); and how to contact CAP at 1-800-622-4845.CILs provide this information to persons seeking services

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.

Each CIL is to have policies and procedures for staff addressing consumer service record management as well as confidentiality. The DSE contracts with each of the CILs include language on safeguarding the confidentiality of all personal information.

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.	Eval	nation
Section	1.	Evan	lation

Goal(s) and the related Objective(s) from Section 1	Method that will be used to evaluate
Grow the Independent Living Network	" times="" new="">Evaluation Methods – Objective A:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Number contacts made and recorded
	" times="" new="">Evaluation Method – Objective B:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">
	" times="" new="">Evaluation Methods – Objective C:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Analysis of Google Analytics data
	" times="" new="">3 – Number of contacts made and recorded
	" times="" new="">Evaluation Method – Objective D:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">Evaluation Method – Objective E:
	" times="" new="">1 – Analysis of percentage of necessary activities completed

	" times="" new="">Evaluation Methods – Objective F:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Number of contacts made and recorded
	" times="" new="">Evaluation Methods – Objective G:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Number of Full Time Equivalents (FTE's) & Part Time Equivalents (PTE's)
Improve INSILC's organizational and operational effectiveness	" times="" new="">Evaluation Methods – Objective A:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Survey of INSILC Members, CILs & Other Providers for training(s) input
	" times="" new="">3 – Training Roster & Tracking
	" times="" new="">Evaluation Methods – Objective B:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Publication Roster & Tracking
	" times="" new="">3 – Dashboard of SPIL Implementation, Progress, & Evaluation
	" times="" new="">4 – Reports logged & recorded
	" times="" new="">Evaluation Method – Objective C:
	" times="" new="">1 – Resource Management Database Reports
	" times="" new="">Evaluation Methods – Objective D:

	" times="" new="">1 – Publication Roster & Tracking
	" times="" new="">2 – Analysis of percentage of necessary activities completed
	" times="" new="">Evaluation Methods – Objective E:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – INSILC Employee Handbook/Council Policy Manual
Conduct Systems Advocacy	" times="" new="">Evaluation Methods – Objective A:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Number of contacts made and recorded
	" times="" new="">Evaluation Method – Objective B:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">Evaluation Methods – Objective C:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Number of contacts made and recorded
	" times="" new="">
	" times="" new="">Evaluation Methods – Objective D:
	" times="" new="">1 – Analysis of percentage of necessary activities completed
	" times="" new="">2 – Number of contacts made and recorded
	" times="" new="">Evaluation Methods – Objective E:

" times="" new="">1 – Analysis of percentage of necessary activities completed
" times="" new="">2 – Number of contacts made and recorded
" times="" new="">Evaluation Methods – Objective F:
" times="" new="">1 – Analysis of percentage of necessary activities completed
" times="" new="">2 – Number of contacts made and recorded
" times="" new="">Evaluation Methods – Objective G:
" times="" new="">1 – Analysis of percentage of necessary activities completed
" times="" new="">2 – Number of contacts made and recorded

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

8 State-Imposed Requirements

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

N/A