

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

## **General Information**

Designated Agency Identification

State: Massachusetts

Agency: Massachusetts Rehabilitation Commission

Plan for: 2017-2019

Submitted in fiscal year: 2016

View grant [90IS0050-01](#) in the Grant Award screen.

# Part I: Assurances

## Section 1: Legal Basis and Certifications

1.1 The designated State unit (DSU) eligible to submit the State Plan for Independent Living (SPIL or the plan) and authorized under State law to perform the functions of the State under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs.

Massachusetts Rehabilitation Commission

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.

Massachusetts Statewide Independent Living Council

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 Adelaide Osborne, Commissioner, Massachusetts Rehabilitation Commission and N/A, N/A.

## 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 funds. Yes

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 [MS Word](#) and [PDF](#) formats) for the state independent living program (Part B) and the centers for independent living program (Part C).

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

### Section 9: Signature for SILC Chairperson

Name Nancy Rumbolt-Trzcinski

Title SILC Chairperson

Signed? Yes

Date signed 06/23/2016

### Section 9: Signature for DSU Director

Name Adelaide Osborne

Title Commissioner, Massachusetts Rehabilitation Commission

Signed? Yes

Date signed 06/23/2016

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

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

Name N/A

Title N/A

Signed? Yes

Date signed 06/23/2016

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

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

#### **1.1 Goals and Mission**

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

Goal Name:Mission Statement

Goal Description:

The joint mission of the Massachusetts Rehabilitation Commission (MRC), the Mass. Commission for the Blind (MCB) and the Statewide Independent Living Council (SILC) through the implementation of this SPIL is to promote the equality, empowerment, and productive independence of individuals with disabilities. In particular, the goals and objectives established in this Plan are designed to support the ability of individuals with disabilities to remain in their homes, enhancing their capacity for independent living and community integration.

Implementation of the SPIL is also designed to improve the ability of the Independent Living program and the Centers for Independent Living to achieve these goals.

Goal Name:Enhancing the Network of Independent Living Centers

Goal Description:

Members of the IL network will enhance the capacity of centers through resource development, outreach, networking and assessment.

Goal Name:Supporting Transitions, Housing and Transportation

Goal Description:

Members of the IL Network are empowered to support individuals of all ages in making transitions.

Goal Name:Access to Health Care, and Long Term Supports

Goal Description:



The IL Network will support and advocate for access to health care including but not limited to physical, dental and emotional and behavioral health services by those of all ages who are living with all functional abilities.

Goal Name:

Goal Description:

## 1.2 Objectives

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

Goal(s) from Section 1.1	Objective to be achieved	Time frame start date	Time frame end date
Enhancing the Network of Independent Living Centers	<p>Increase funding for Independent Living Centers by \$5 Million over three years.</p> <p>Action Steps:</p> <ol style="list-style-type: none"> <li>1. CILS will advocate for increased funding.</li> <li>2. CILS will engage in resource development.</li> <li>3. CILS, SILC and MRC will seek out opportunities to provide technical assistance for diversification of funds.</li> </ol>	10/01/2016	09/30/2019
Enhancing the Network of Independent Living Centers	<p>Together with MRC the Independent Living Centers will develop and implement a method for collecting outcome measures statewide.</p> <p>Action Steps</p> <ol style="list-style-type: none"> <li>1. Outcome measures will be integrated into the WILD data collection system.</li> <li>2. Consumer satisfaction survey tool and process will be updated.</li> </ol>	10/01/2016	09/30/2019
Enhancing the Network of Independent Living Centers	<p>Increase the percentage of individuals, identified as being from an underserved population, served by ILC's.</p> <p>Action Steps:</p>	10/01/2016	09/30/2019

	<p>1. SILC and the CILS with the collaboration of MRC and MCB will identify underserved populations to target outreach to.</p> <p>2. SILC and the CILS with the collaboration of MRC will develop avenues and resources for education and technical assistance to CILS.</p> <p>3. CILS will increase outreach to underserved populations.</p>		
Supporting Transitions, Housing and Transportation	<p>Transition to Adulthood Programs (TAP) will be available to every Massachusetts Community through Independent Living Centers.</p> <p>Action Steps:</p> <p>1. MRC will, when funding is available expand the availability of funding for TAP programs for Independent Living Centers.</p> <p>2. Centers will advocate for funding to have Transition to Youth (TAP) programs in each Independent Living Center.</p> <p>3. SILC, CILs, MRC and MCB as DSEs, will collaborate to offer training opportunities to staff working with youth.</p>	10/01/2016	09/30/2019
Supporting Transitions, Housing and Transportation	<p>Goal 2 Objective 2</p> <p>Massachusetts Independent Living Centers will transition an average of 200 individuals from nursing homes per year over three years</p> <p>Action Steps</p> <p>1) MRC, MCB, the CILS and SILC will identify resources needed to support individuals transitioning from nursing homes following the end of Money Follows the Person Demonstration.</p> <p>2) MRC and MCB in collaboration with other state agencies, federal agencies, the SILC and the CILS will identify potential funding sources for resources needed, especially housing access.</p>	10/01/2016	09/30/2019

	<p>3) CILS, SILC and MRC will continue to offer opportunities for staff training to support individuals transitioning from nursing homes.</p> <p>4) SILC, CILS, MRC and MCB will identify opportunities to assist individuals with home modifications to allow them to maintain independence, or transition from nursing home care.</p>		
Supporting Transitions, Housing and Transportation	<p>People with disabilities will have increased access to affordable, available, accessible and integrated housing including both public and private.</p> <p>Action Steps</p> <p>1) All pertinent CIL staff will be trained in housing search.</p> <p>2) CILS will advocate for increased funding for the Alternative Housing Voucher Program (AHVP), Mobile Housing Voucher Program (MHVP) and other housing voucher programs that support individuals with disabilities.</p> <p>3) CILS will advocate for legislation that increases available, affordable, accessible and integrated housing.</p> <p>4) CILS and SILC will work with partners in the community to increase education to legislators and the public regarding the need for available, affordable, accessible and integrated housing.</p>	10/01/2016	09/30/2019
Supporting Transitions, Housing and Transportation	<p>Individuals with disabilities in Massachusetts have access to both public and private, affordable, accessible transportation.</p> <p>Action Steps</p> <p>1) SILC and CILS will advocate for full accessibility with public and private transportation agencies.</p> <p>2) Centers will participate in local Regional Transportation Authority's (RTAs) or Aging &amp; Disability Resource Consortium (ADRC).</p>	10/01/2016	09/30/2019

	<p>3) CILS and SILC will provide opportunities to showcase local transportation projects and innovative strategies to increase access to affordable, available and accessible transportation. For example IL Conference, the CIL newsletters and social media.</p> <p>4) MRC, MCB and CILS will provide funds for home modifications which support access to transportation.</p>		
Access to Health Care, and Long Term Supports	<p>Individuals with disabilities in Massachusetts will have access to long term services and supports that are consumer-directed to the highest degree possible, with the aim of enhancing independence and recovery.</p> <p>Action Steps:</p> <ol style="list-style-type: none"> <li>1. SILC and CILs will monitor, educate and advocate for legislation and MassHealth initiatives that support the ability of individuals with disabilities to access chosen care and support services that enhance each individuals? ability to live to the greatest degree desired integrated and independent lives.</li> <li>2. SILC and CILs will work to ensure opportunities for ILC, advocate, and consumer involvement in the design and implementation of health reform efforts for people with disabilities.</li> <li>3. Ensure the education of ILC staff on a wide range of supports available to individuals, including emotional and behavioral health supports.</li> <li>4. CILs and SILC will support efforts to maintain and develop the system of Recovery Learning Centers in Massachusetts.</li> </ol>	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

The Independent Living Centers in Massachusetts serve all the counties and towns in the Commonwealth. Over the course of the last SPIL, the centers have increased the proportion of individuals served with disabilities as compared with the estimated number of persons with disabilities; however the entire Commonwealth remains underserved. The demand for services remains greater than the current funding can support, with many centers having waiting lists for IL services. The current SPIL will focus not only on resource development to increase capacity, but also outreach to underserved populations.

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

The areas of the Commonwealth that are the most underserved are the Southeast, Cape Cod and the Islands. This area contains both small metropolitan areas as well as rural and difficult to reach areas. All the Independent Living Centers in Massachusetts will continue to outreach to underserved populations.

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

Independent Living Centers continue to strengthen outreach efforts to minority groups that are identified in their service areas. These include, but are not limited to LGBTQIA individuals, individuals for whom English is not a primary language and Native American communities.

### 1.3 Financial Plan

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

#### 1.3A Financial Plan Tables

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

Year 1 - 2017 Approximate 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	90731	163742	72000	17182

Title VII Funds Chapter 1, Part C			1314447	
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)				
Other Federal funds - other	65000			
Non-Federal funds - State funds			6130018	
Non-Federal funds - Other				
Total	155731	163742	7516465	17182

Year 2 - 2018 Approximate 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	90731	163742	72000	17182
Title VII Funds Chapter 1, Part C			1314447	
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)				
Other Federal funds - other	65000			
Non-Federal funds - State funds			6130018	
Non-Federal funds - Other				
Total	155731	163742	7516465	17182

Year 3 - 2019 Approximate 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	90731	163742	72000	17182
Title VII Funds Chapter 1, Part C			1314447	
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)				
Other Federal funds - other	65000			
Non-Federal funds - State funds			6130018	
Non-Federal funds - Other				
Total	155731	163742	7516465	17182

### 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.**

Title VII Chapter 1 Part B

163,742 - For consumer services. 131,586 would be allocated directly to Independent Living Centers and DEAF INC. for direct services for consumers at IL Centers and DEAF inc. to support consumer Independent Living Goals.

32,156 would be granted to MCB, through an interagency agreement with Massachusetts Rehabilitation Commission. MCB would utilize Part B funds for its direct services program to provide independent living services to those legally blind persons with the most significant secondary disabilities. The priority for MCB Part B is service provision that will enable people to remain in their homes, enhancing capacity for independent living and community integration.

72,000 allocated to the IL's centers and DEAF Inc. to support services coordination required for the support of Independent Living Services.

90,731 allocated to the SILC for General Operations including the support of developing, implementation and monitoring the State Plan for Independent Living.

17,182 would be allocated to the DSE for administrative costs.

Title VII Funds Chapter 1, Part C

1,314,447 supports the direct funding of IL services through Independent Living Centers.

Older Blind Funds are not included in this SPIL.

**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.**

Massachusetts's current 11 independent living centers serve all counties of the Commonwealth. Centers are currently funded using a combination of Federal Part B and C dollars and state funds. In addition to the Federal Funds outlined in section 1.3B(1) Massachusetts allocates approximately 6,130,018 to the General Operation Centers for Independent Living. The SILC and CIL's will also work to educate legislators of the need for additional funding to address future enhancement of the network and to address identified unmet needs of consumers.

**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 SILC, CILs, MRC and MCB along with government partners work together regularly on opportunities where cross training is valuable for the entire disability community. Massachusetts Rehabilitation Commission offers technical assistance and training opportunities, in particular around housing to CIL staff. In addition, state-funded MRC staff are involved in the on-site compliance reviews which are conducted to determine CIL compliance with section 725 of the Act. MRC also provides assistance with research.

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

N/A

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

**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.**

This SPIL reflects the State's commitment to carry out an IL plan under Chapter 1 of Title VII of the Rehabilitation Act of 1973, as amended (Chapter 1), and also the State's planning and implementation activities related to the plan.

**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.**

The SPIL Committee which directed the writing of the SPIL and the SPIL objectives include members of the SILC, representatives of the DSE and representatives of the Centers, including



directors and senior management. The SPIL Committee requested and incorporated feedback from the Centers at several points in the process. During the public hearing and comment period, virtually all of the centers in the commonwealth were included and given the opportunity to provide input into the development of the SPIL. Center Directors were also provided opportunities to provide feedback once objectives were developed prior to the final draft of the 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.

MASILC includes ex-officio seats for the DSE's, Massachusetts Rehabilitation Commission and Massachusetts Commission for the Blind as well as the Department of Developmental Disabilities Services, Massachusetts, Office on Disability, Massachusetts Department of Mental Health, the Massachusetts Developmental Disabilities Council, and the Massachusetts Department of Public Health.

A member of the Council is appointed on the State Rehab Councils for both the Rehabilitation Commission and the Commission for the Blind. The SILC is regularly invited to participate in the works of the Massachusetts Office on Disability, the DD Council and with other disability related organizations in the state.

The SILC & State Rehab Councils regularly co-support education events at the State House working together as equal partners to educate legislators and on many other projects throughout the year.

Each year the SILC supports the State's annual ADA Day celebration working with the State Department of Conservation & Recreation, all 11 Independent Living Centers, and various community organizations such as the American Association of People with Disabilities, Disability Policy Consortium, Institute for Human Centered Design, Disability Law Center, New England PVA, SEIU 1199 and others.

Through this collaboration, the SILC continues to reach out to un-served and underserved populations throughout the Commonwealth seeking input, developing relationships, and identifying individuals to serve as SILC members.

## **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.

Massachusetts Commission for the Blind, BRIDGE Elder Blind Program (OIB)

MCB manages a comprehensive service program that includes direct service, purchase of service capacity and an innovative sub-grant program that supports the operation of peer support groups. The priority is the provision of services that enhance the capacity for independent living among blind elders. CILS work with the Bridge program to make appropriate referrals.

Vocational Education

VR IL contract MRC VR and each of the CILs, except MILCB, for pre-vocational services for current MRC VR consumers.

Developmental Disabilities Services

Some of the CILs are involved with developmental disabilities services through their participation in their local ADRC. MRC is involved with the statewide coordination of ADRCs.

Public Health

Some of the CILs are involved with public health services through their participation in their local ADRC and MRC is involved with the statewide coordination of ADRCs. The SILC also participates as a member in the Health and Disability Partnership. The Massachusetts Health and Disability Partnership is a coalition of disability advocacy organizations, state agencies and other stakeholders working to improve the health of people with disabilities statewide, which was created by the Department of Public Health's Health and Disability Program.

Mental Health

One CIL has a Recovery Learning Community, funded by the Department of Mental Health.

Housing

Many CILs are working with local housing authorities, as well as the Community Based housing initiative and the Citizens Housing and Planning Association on housing policy and development. Some CILs have been working with MRC on mobilizing local housing authorities with Department of Housing and Community Development on the new NOFA from HUD to increase subsidized housing. MRC funds CILs collaboration work with the statewide web based Housing Registry

Transportation

One CIL within their ADRC has a major task force on Transportation, with the mission that all residents of the North Shore will be able to travel where they want and when they want. This CIL is working on multiple new transportation service projects.

#### Veteran's Services

Some of the CILs are involved with veterans consumer directed services through their participation in their local ADRC and MRC is involved with the statewide coordination of ADRCs.

#### Programs under XVIII - XX of the Social Security Act

All CILs consistently work with the DSEs and other state agencies to insure that the consumer directed PCA program, the first in the country, is reflective of independent living philosophy as well as is sufficiently available to CIL consumers. Many CILs provide Medicaid funded consumer directed Personal Care Assistance programs. MRC provides Benefits Planning to assistance MCB consumers as well as to CIL consumers. Some CILs have had staff trained in SHINE skills and another CILS use existing SHINE Services through their ADRC.

### **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.

OIB are no longer a part of this state plan.

## 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).

<b>Table 2.1A: Independent living services</b>	<b>Provided by the DSU (directly)</b>	<b>Provided by the DSU (through contract and/or grant)</b>	<b>Provided by the CILs (Not through DSU contracts/grants)</b>
Core Independent Living Services - Information and referral	Yes	Yes	No
Core Independent Living Services - IL skills training	Yes	Yes	No
Core Independent Living Services - Peer counseling	Yes	Yes	Yes
Core Independent Living Services - Individual and systems advocacy	No	Yes	No
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	Yes	Yes	No
Mobility training	No	Yes	No
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	Yes	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	Yes	Yes	Yes
Education and training necessary for living in the community and participating in community activities	No	Yes	Yes
Supported living	No	Yes	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	Yes	Yes	No
Individual and group social and recreational services	No	No	No
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	No
Services for children with significant disabilities	Yes	Yes	No
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities	Yes	Yes	Yes

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

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

The objectives, as identified in section 1.2 of this SPIL will focus on the following specific populations. Objectives under Goal 1 and Goal 2 address targeted groups for service provision priorities which include youth, individuals in nursing homes and underserved populations.

Objectives under Goal 1 focus on strengthen the network of CILS and in particular focus on identification and outreach to underserved populations.

Objectives under Goal 2 focus on expanding the state-wideness of programs within the CILS that focus on transition aged youth.

Objectives under Goal 2 also specifically address individuals transitioning out of nursing homes to live independently.

#### Massachusetts Commission for the Blind Part B Program

The priority for MCB Part B is service provision that will enable people to remain in their homes, enhancing capacity for independent living and community integration.

#### Massachusetts Rehabilitation Commission Part B Program administration

Part B funds made available through the Mass. Rehabilitation Commission will be administered through the CILs, including determinations of eligibility and certification for services. When MRC receives Part B grant funds from ACL, funds will be allocated for part of a staff position to administer and oversee the Part B activities, as well as to carry out MRCs responsibilities as the DSE (including CIL compliance reviews, monitoring of the SPIL, 704 reporting). Part B funds will also be allocated for support of the SILC operations.

Consumers are allowed to receive funding from more than one category in each FFY and consumers can request funding in subsequent years as long as new consumers requesting services are given priority to be served.

Part B funding may be used for the following services, with the cost limitations specified.

8,200 limit for vehicle modifications.

2,500 limit for Assistive Technology.

3,000 limit for home modification. People eligible for the Home Modification Loan Program would be ineligible for Part B unless they can show that the total cost of their modification exceeds the loan limit of the HMLP

1,500 will be the limit for ancillary services.

Ancillary services must be related to either:

a. expenses that will facilitate transition or diversion from an institution (nursing facility or shelter), and where such institutionalization is disability-related, and not solely due to financial circumstances; or,

b. goods and services that improve the health or safety of an eligible individual when it can be justified that these goods and services will improve the individual's ability to function, continue functioning or move towards functioning independently in family or community or to continue in employment. MassHealth approval for the item or service must be sought by consumers who are MassHealth members, and a denial received prior to use of Part B funds. Written documentation of this denial must be kept in the consumer's CSR.

Dispersal of funds: Part B funds for consumer services will be allocated to the individual CILs and DEAF, Inc. as soon as funds are available. Each CIL and Deaf Inc. will be allocated an amount which they can use for the federal Fiscal Year in which the funds were appropriated. At the end of that federal fiscal year, any funds which were not encumbered by a CIL and DEAF, Inc. for a specific client's services will be allocated to a central fund. For the subsequent year those central funds will be managed by MRC, and any CIL (or DEAF, Inc) which has exhausted its own allocation of Part B funds may apply to use central funds for consumer services. As an example, when FY14 Part B funds are made available in Massachusetts, the amount available for CIL service coordination and consumer services is calculated. These figures are then divided by 12, where each CIL and Deaf Inc, is informed of their allocation. For a full fiscal year these amounts might be \$6,000 for Service Coordination, and \$8,000 for client services. (Since Part B funds are not necessarily granted all at once, CILs may be notified of an initial allocation which is later revised.) During the FFY each CIL and Deaf Inc, will accept applications, determine eligibility and authorize services to be paid with their allocated funds, to the limit of those funds. If a CIL does not use all its allocated Part B funds in the fiscal year, those funds will go into a centralized pool on October 1 of that year, to which any CIL or DEAF, Inc. can apply. If any CIL exhausts its FFY funds before September 30th of that year, and receives subsequent client service requests during that year, they may apply to MRC to use Central funds.

All of Massachusetts CILs and Deaf, Inc. will administer the day-to-day operation of the Part B Program without DSU intervention. MRC will monitor the program, collect quarterly quantitative data and conduct on site program reviews. Should a CIL or Deaf, Inc. be unable to meet performance criteria specified in the review process, the DSU reserves the right to assume

responsibility for the operation of the Title VII Part B program until such time that the CIL or Deaf, Inc. demonstrates that all needed corrective actions have been taken.

In the previous SPIL, SILC supported that MRC make 3 options available to all 11 CILs and Deaf, Inc. for use of Part B funds. Due to the success of the program the options will be carried forward in the 2013-2016 SPIL. They are:

Option 1 Continue the provision of individual independent living services.

Although MRC, MCB and MCDHH have state funds for assistive technology it is not sufficient to meet all the needs of the large number of people requiring these services. Long waiting lists for these services exist.

Under this SPIL, consumers can apply for Part B funds while on a waiting list for any of these other funding sources for assistive technology and may use the AT Loan program as well. This would mean that if state funds for assistive technology are made available first, then the consumer must take that source of funding, and Part B cannot be used. The reverse would also be true and this would safeguard double service provision.

Option 2 Operate innovative projects to enhance Independent Living options for individuals with significant disabilities within the community.

Project activities must address improved access to community services. The CIL or Deaf, Inc. will be required to submit a proposal to MRC which must include:

Goals of the project

Measurable outcomes

How Part B, and other, funds will be utilized

Evaluation measures

Time limit of up to three years, or end of this SPIL, whichever comes first.

Each proposal must describe the community system change need(s) being addressed, consumer and Board input of the project design, and strategies for achieving the project outcomes.

Some examples of projects under this option include: developing, printing and distributing a resource guide of a particular topic in the CILs or Deaf, Inc. service area; community development to obtain support from local municipalities and other entities for funding of CIL or Deaf, Inc. activities; or development of a disability awareness curriculum for use in a particular setting. MRC with a select group of consumers recommended by the SILC will review all proposals. Proposals will be solicited prior to the start of each fiscal year.



Option 3: A CIL or Deaf, Inc. can choose to use their Part B allocation in a combination of Option 1 and Option 2.

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.

MRC does not provide direct IL services, but provides the IL services listed in section 2.1A through contracts with CILs or other providers. These include:

Home Modification Loan program - administered by the Community Economic Development Assistance Corp.

Accessible Housing Registry - operated by the Citizens Housing and Planning Association

New England Index - a statewide database of resources and services - operated by the Eunice Kennedy Shriver Center at the University of Massachusetts Medical School.

Supported Living - MRC contracts with 11 non-profit providers across the state.

MCB provides IL services, such as Home Modifications, on case by case basis with approved vendors.

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.

Each of the CILs in Massachusetts determines eligibility for services during the consumer intake process. The Data Management System currently in use will not count a consumer as active for 704 purposes unless the eligibility form has been completed and signed electronically by the staff

person completing the intake process. One of the ways the DSE ensures there is compliance is through site reviews.

## **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.

Massachusetts has a network of 11 Centers for Independent Living, that meet the Section 725 standards. Each CIL has a defined service area, although many CILs provide services to individuals outside their service areas. These service areas are defined by lists of cities or towns, and do not fully coincide with county lines or service areas of other agencies. The service areas of most CILs have been established to include a population of at least 400,000. The exceptions are AdLib in Western Massachusetts and the Cape Organization for the Rights of the Disabled in Hyannis, where local geography imposes natural boundaries to areas that contain smaller populations. The Boston Center for Independent Living serves an area with 1.2 million residents.

An example of a service provided to consumers outside of a CIL's service area is; Information and referral which is provided to any caller, from anywhere in the state. This is a core service under Part C funding. Callers who identify themselves as residing in a town outside a CIL's area of service would be referred to the CIL serving that town.

All of Massachusetts CILs receive a combination of Part C, Part B, and state funding. Many of the centers also receive funding from other sources in their geographic region of the state.

The network of CILs in Massachusetts provides services to all 351 cities and towns in the Commonwealth at sixteen sites:

SPIL SIGNATORY1. Ad Lib (Pittsfield and North Adams) serves 32 mostly rural cities and towns in Berkshire County, the westernmost county in Massachusetts;

2. Boston Center for Independent Living (Boston) serves communities in Boston and 33 suburbs to the south, north, and west located in Suffolk, Norfolk & Middlesex Counties;

SPIL SIGNATORY3. Cape Organization for Rights of the Disabled (Hyannis) serves the 23 towns on Cape Cod, and the islands of Martha's Vineyard and Nantucket located in Plymouth, Barnstable, Dukes, and Nantucket Counties;

SPIL SIGNATORY4. Center for Living and Working (Worcester and Fitchburg) serves 63 cities and towns in Central Massachusetts located in Worcester & Middlesex Counties;

5. Independence Associates (East Bridgewater) serves 31 cities and towns in Southeastern Massachusetts located in Plymouth & Bristol Counties;

6. Independent Living Center of the North Shore and Cape Ann (Salem) serves 25 cities and towns along the coast North of Boston as far north as the tip of Cape Ann in the coastal region located in Essex County;

SPIL SIGNATORY 7. MetroWest Center for Independent Living (Framingham) serves 26 towns in suburban and rural communities located between Boston and Worcester in Middlesex & Norfolk Counties;

SPIL SIGNATORY 8. Multicultural ILC of Boston (Jamaica Plain) serves 9 communities in inner city Boston located in Suffolk & Norfolk Counties.

9. Northeast Independent Living Program (Lawrence) serves 27 cities and towns located in the northeast corner of Massachusetts in Middlesex & Essex Counties;

SPIL SIGNATORY 10. Southeast Center for Independent Living (Fall River and New Bedford) serves 20 cities and towns in the southeast coastal area of Massachusetts located in Plymouth & Bristol Counties;

SPIL SIGNATORY 11. Stavros (Amherst, Greenfield, and Springfield) serves consumers who live in 69 cities and rural towns of Western Massachusetts in Franklin, Hampden, & Hampshire Counties.

### 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).

Massachusetts CILS serve all 351 communities of Massachusetts. Despite serving all communities there is still unmet IL service need. The most recent census data suggests that CILS are currently serving approximately 3.4% of the estimated number of disabled persons across the state. This is an increase from the last SPIL and reflects increases in funding at the state level.

The SILC and the DSU's, (now DSE) established a workgroup as a part of the last SPIL. The workgroup looked at the feasibility of creating a new center to address unmet needs. The workgroup concluded that a new center would not have the desired impact on reducing unmet need for the following reasons.

There are no current stable funding sources available for a new center.

Increasing the number of centers in Massachusetts would not address the needs of individuals across the state.

This SPIL focuses on addressing unmet needs through enhancing the current network of centers through funding, increased outreach and outcomes based measurement.

### 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.

As a 723 state, the MA SILC and the DSE's agree to the following set of priorities which will target expansion of funding for the existing CILs, establishment of branches, satellites and/or new CILs dependent upon federal and state funding increases.

In allocating new federal Part C and state independent living funds among the CILs, the Commonwealth will be guided by the following priorities:

MRC will support existing CILs and development of branches, satellites and/or new CILs that comply with Section 725 standards and assurances. New money will be distributed among the existing CILs using the following process:

Additional monies will be split 12 ways with The Boston Center for Independent Living receiving 2 shares to address their large service area, and each of the 10 remaining CILs will receive 1 share.

To be approved for continued funding, existing CILs must submit documentation to the DSE providing evidence of compliance with standards defined in Section 725 of the Act, as determined by a compliance review conducted by MRC.

Any cuts in Title 7 Part C, or state funds allocated for Independent Living, will be applied to all CILs in the network existing at the time, at the same percentage as the total cut. For example, a 5% cut in state IL funds would result in a cut of 5% in the state IL amount granted to each CIL. In the event of a cut to Part B funds, the SILC and MRC will negotiate how to allocate that cut across all Part B funded activities.

Closing of a Center for Independent Living: In the event that a Center funded by Title VII, Part B or Part C should close, the Massachusetts Statewide Independent Living Council, the network of Centers and Massachusetts Rehabilitation Commission will collaborate on development of a plan for the distribution of funds previously allocated to the Center. Should such funds remain available for use in the State, the areas and populations previously served by the now-closed center will be given priority to maintain or reestablish service either through allocation of funds to an existing center or creating a Center for Independent Living to serve those areas. The goal will be to maintain services for all areas of the State.

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.

The Designated State Entity (DSE), the Massachusetts Rehabilitation Commission (MRC), will continue to receive and administer federal funds under Section 723 of the Rehabilitation Act as amended, according to current practice, including:

a. Compliance with funding priorities set forth below and the allocation formula approved by the SILC during this plan.

i. The director of the DSE hereby applies to award grants or assistance contracts to eligible agencies in the State that comply with the standards and assurances set forth in section 725 of the Act. The grants are to be made from the funds allotted to the State for the planning, conduct, administration, and evaluation of CILs under part C, Chapter 1.

ii. The state administers funds in compliance with 723 (Sec.704(h) of the Act; 34 CFR 366.32, .35)

b. State IL contracts for existing centers for independent living (CILs) will continue to be linked to existing federal grants pursuant to the provisions of regulations of the Commonwealth of Massachusetts Division of Purchased Services.

i. The director of the DSE awards grants or assistance contracts under section 723 of the Act to any eligible agency that was awarded a grant under part C, Chapter 1 on September 30, 1993, unless the director makes a finding that the agency involved fails to comply with the standards and assurances set forth in section 725 of the Act or the director of the DSE and the chairperson of the SILC, or other individual designated by the SILC to act on behalf of and at the direction of the SILC, jointly agree to another order of priorities.

ii. The State assures that any assistance contracts issued to eligible agencies will not add any requirements, terms, or conditions to the assistance contract other than those that would be permitted if the assistance contract were a sub-grant consistent with grants issued by RSA under section 722 of the Act.

iii. In administering the part C, Chapter 1 program, the State will not enter into any procurement contracts with CILs to carry out section 723 of the Act.

iv. Monitoring and Oversight. (704(h), 723(g) and (h) of the Act; 34 CFR 366.38)

v. The State assures that periodic and on-site compliance reviews will be conducted to determine CIL compliance with section 725 of the Act as described in Attachment 3.

c. State and federal site reviews for compliance with standards and assurances will continue to be conducted by the MRC, in cooperation with the Statewide Independent Living Council (SILC), using the time lines established for federal compliance reviews.

## **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 the DSE hereby applies to award grants or assistance contracts to eligible agencies in the State that comply with the standards and assurances set forth in section 725 of the Act. The grants are to be made from the funds allotted to the State for the planning, conduct, administration, and evaluation of CILs under part C.

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

The director of the DSE awards grants or assistance contracts under section 723 of the Act to any eligible agency that was awarded a grant under part C, Chapter 1 on September 30, 1993, unless the director makes a finding that the agency involved fails to comply with the standards and assurances set forth in section 725 of the Act or the director of the DSE and the chairperson of the SILC, or other individual designated by the SILC to act on behalf of and at the direction of the SILC, jointly agree to another order of priorities.

The State assures that any assistance contracts issued to eligible agencies will not add any requirements, terms, or conditions to the assistance contract other than those that would be permitted if the assistance contract were a sub-grant consistent with grants issued by RSA under section 722 of the Act.

In administering the part C, Chapter 1 program, the State will not enter into any procurement contracts with CILs to carry out section 723 of the Act.

State and federal site reviews for compliance with standards and assurances will continue to be conducted by the MRC, in cooperation with the Statewide Independent Living Council (SILC), using the time lines established for federal compliance reviews.

## **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 allocates Federal Part B funds for the operation of the SILC. The major areas of SILC coordination expenses include: SILC Board Member and CIL Director travel, teleconference expenses for board and committee meetings, training for coordinator and board, travel for coordinator to national IL conferences, office expenses (including rent, supplies, phones and long distance). The SILC annually develops and approves its budget as an autonomous body separate from the DSE's. Funding for the SILC is in compliance with 34 CFR 364.21 to carry out its statutory duties.

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.

Policies include: procedure for Setting Up Teleconferences (7 Communication), Procedures for Performing an Inventory, Procedures for Processing Invoices for Payment, Procedures for Planning SILC Quarterly Meetings, Procedures for Accessing SILC Funded Transportation to and from Council activities, and Procedures for updating the Web Page. The SILC Finance committee meets at least quarterly to review the budget and expenditures and a financial report is submitted to the SILC body each quarterly meeting for approval.

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

The SILC operates as an independent entity with MetroWest Center for Independent Living, Inc. as its fiscal intermediary. The SILC maintains regular communication with the DSE's and the Governor's office, but the board of the SILC is responsible for the decisions and actions of the SILC. The SILC annually develops and approves its budget & priorities as an autonomous body.

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



The majority of the funds for the SILC are from the federal Part B program. Additional funding comes from the Commonwealth of Massachusetts through the Massachusetts Rehabilitation Commission and the Massachusetts Commission for the Blind through Vocational Rehabilitation Funding.

## 5.2 Establishment and Placement

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

The Massachusetts SILC was established under Executive Order 373 by his honor Governor William Weld on September 26, 1994. It is housed independently at the offices of MetroWest Center for Independent Living, Inc. in Framingham MA., which acts as its fiscal intermediary.

The SILC develops and implements its own budget separate from MWCIL and the state agencies. MWCIL simply acts as the SILC's fiscal intermediary. The SILC is governed by its own set of bylaws and policies & procedures.

## 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.

The SILC maintains an active Nominations & Development Committee. This committee meets monthly via teleconference or face-to-face.

The committee reviews nominations in process, new nominations and continued development of the SILC. The committee regularly conducts outreach for new members.

SILC members are appointed by the Governor's office to fill a term of three years. SILC members may complete up to two consecutive complete terms.

Should a SILC member be appointed to fill an existing vacancy they are eligible to serve two additional consecutive complete terms.

The nominations process is as follows:

1. Nominations of qualified individuals are received by the SILC and forwarded to the Nominations & Development committee.
2. The Nominations and Development committee looks to see from the application or through personal knowledge if the applicant meets the qualifications of a SILC member established under the SILC's bylaws.

3. If the applicant is qualified, an interview with the Nominations & Development Committee is set up, if necessary.
4. The committee then votes to forward the individuals name to the SILC Executive committee for approval.
5. During the next regularly scheduled meeting of the SILC Executive Committee the name is brought forward by the Nomination & Development Committee Chairperson during His/her report for consideration of the committee.
6. Once approval of the nominee is received from the Executive Committee the SILC Coordinator forwards the new nominees name and contact information to the Governor?s Office on Boards and Commissions.
7. The Governor?s Office on Boards and Commissions then issues a complete background check which any individual applying for consideration for gubernatorial appointment in the Commonwealth must fill out.
8. The Governor?s office then appoints the individual to fulfill either the remainder of a term that has been vacated or a new three year term.
9. The individual is appointed by the Governor?s office and has 60 days to be sworn in and to take their oath of appointment.
10. A copy of the oath is then sent to the governor?s office and maintained on the nominees file in the SILC office.

#### 5.4 Staffing

Describe how the following SILC staffing requirements will be met.

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

The SILC hires an independent consultant to act as its Coordinator. The Coordinator is a contracted position with the SILC?s fiscal intermediary the MetroWest Center for Independent Living. The Coordinator?s contract is reviewed annually by the SILC Chairperson & its fiscal intermediary to be sure that the coordinator is fulfilling the tasks outlined on the independent consultant?s contract.

- 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 SILC Coordinator is directed by the SILC Chairperson. All assignments and tasks come to the coordinator directly from the chairperson who works with the Executive committee and the

other active committees of the SILC. Although the SILC is housed at the MetroWest Center for Independent Living, Inc. it is governed by its own set of bylaws and policies and procedures separate from the center's, which simply act as the SILC fiscal agent and provides office space for the SILC to perform its day to day operations.

State agency staff assigned as ex-officio members of the SILC, are not assigned any duties that would create a conflict of interest while assisting the SILC.

The SILC intends to conduct activities under the new authorities provided for in the Act as follows:

? Collaborate with the CILs on resource development to expand capacity of current CILs.

? Conduct advocacy activities to ensure state policies and services are in place that align with the SPIL Goals and Objectives

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

Describe how the following service provider requirements will be met:

### 6.1 Staffing

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

All CILs and other IL service providers in Massachusetts have policies and procedures in place to ensure that staff that specialize in the development and provision of IL services and support work directly with the centers in the network.

Further, each of the centers in the network of CIL?s, have staff that are specialists in the five core independent living services.

- Availability, to the maximum extent feasible, of personnel able to communicate (1) with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille, or audio tapes and (2) in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act.

All CILs and other IL service providers in Massachusetts have policies and procedures in place to ensure that staffs of the DSE?s and CIL?s include individuals who are able to communicate with persons with significant disabilities in their native languages. They have the ability to produce materials in alternative formats such as: Braille, Large Print, Electronic Format, Audio, and the use of picture boards for non-verbal consumers. Many CIL?s have bilingual staff that are able to communicate with consumers in their native languages.

- 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.

All CILs and other IL service providers in Massachusetts have policies and procedures in place to ensure that DSE?s maintain a program of on-site staff development, as well as sponsorship of off-site development. The SILC, CIL?s, DSE?s and Government Partners work together regularly on opportunities where cross training is valuable for the entire disability community.

- Affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act.

All CILs and other IL service providers in Massachusetts have policies and procedures in place to ensure that the CILs both make use of affirmative action to employ and advance in employment qualified individuals with significant disabilities.

## 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.

## 6.3 Recordkeeping, Access and Reporting

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

All CILs and other IL service providers in Massachusetts have policies and procedures in place to ensure that program activities are delivered in accordance with relevant sections of the Rehabilitation Act, including program services, program funding, state match, and state plan requirements.

All fiscal transactions are conducted in accordance with appropriate federal and state fiscal regulations.

Each CIL in the network is required to maintain compliance with contractual requirements, including compliance with the Rehab Acts Section 725 Standards and Assurances and other state & federal requirements.

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

At present each center annually submits its 704 report to the Massachusetts Rehabilitation Commission. As a 723 State, MRC then compiles and submits one report on behalf of the entire state to the secretary in Washington. If report requirements change in the future the SILC, CILS and DSE?s will comply with updated reporting requirements.

Each center annually conducts a Consumer Satisfaction Survey. Information from this survey is shared with MRC & the SILC to determine trends and potential training needs within the network.

- 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.

MRC staff review contract compliance of all SPIL related CIL contracts on an ongoing basis, regardless of funding source, including Title VII, Part B funds.

Each year, fifteen percent of the centers in the network receive an onsite compliance review. The team for the review consists of staff from Massachusetts Rehabilitation Commission, a peer reviewer for the executive director and a SILC observer.

Upon completion of the onsite review process, the final report of the review team is shared with the SILC's State Plan for Independent Living Committee, which looks at the reports for any developing trends, patterns, and training needs.

#### 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.

All CILs and other IL service providers in Massachusetts have policies and procedures in place to ensure that all Individuals with significant disabilities in the Commonwealth are eligible for services provided under this SPIL.

- 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 eleven Independent Living centers in the Commonwealth provide Information & Referral services to any person who contacts them. Persons contacting the SILC for information are directed to the Independent Living center which serves the community in which they reside.

- 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.

To be eligible, an individual is one:

1. Who has a significant physical, mental, cognitive, or sensory impairment
2. Whose ability to function independently in the family or community or whose ability to obtain, maintain, or advance in employment is substantially limited
3. For whom the delivery of IL services will improve the ability to function, continue functioning, or move towards functioning independently in the family or community or to continue in employment.

- 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.

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

- 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.

All CILs and other IL service providers in Massachusetts have policies and procedures in place to ensure that no individual will be excluded from receiving services based on the imposition of state or local residence requirements.

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

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

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

All recipients of financial assistance under Chapter 1 that provide services to individuals with significant disabilities advise those individuals seeking or receiving IL services about the availability of the Client Assistance Program under section 112 of the Act.

The purposes of the services provided under such program, and information on the means of seeking assistance under such program.

The administrator of the CAP Program for the Commonwealth of Massachusetts is the:

Massachusetts Office on Disability

1 Ashburton Place

Room 1305

Boston, MA 02108

Information for the CAP program is available in alternative formats such as Braille, Large Print, Electronic Format, Audio, and the use of picture boards for non-verbal consumers.

## 6.7 Protection, Use and Release of Personal Information

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

All CILs and other IL service providers in Massachusetts have policies and procedures in place to ensure that the DSEs and CILs maintain written policies to assure and safeguard the confidentiality of all personal information, and release of information forms are used comply with 34 CFR 364.56(a), and HIPPA.

Each of Massachusetts CILs will be responsible for following its identified method of assuring consumer information is kept confidential and that its policy for acquiring signed releases of information prior to sharing information about individual consumers with other service providers or entities is strictly adhered to.



## Part II: Narrative: Section 7 - Evaluation

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

### Section 7: Evaluation

Goal(s) and the related Objective(s) from Section 1	Method that will be used to evaluate
<p>Enhancing the Network of Independent Living Centers</p> <p>Supporting Transitions, Housing and Transportation</p> <p>Access to Health Care, and Long Term Supports</p>	<p>Strategies for monitoring and evaluating objectives in the SPIL work plan include the following:</p> <ol style="list-style-type: none"> <li>1. The Chairperson of the SILC will appoint a SPIL Committee that will meet quarterly to assess the progress of the SPIL.</li> <li>2. The SPIL Committee will work with CILS, MRC and MCB to determine how data will be gathered.</li> <li>3. Review the 704 Reports (Part II) from the CILS's.</li> <li>4. Conduct additional surveys as needed.</li> <li>5. Review the 704 Report (Part I) for the SILC and MRC and MCB.</li> <li>6. The SILC and CILS will monitor legislation and administrative changes at the state level that impact SPIL Goals.</li> <li>7. The SILC and CILS will monitor state and federal budgets.</li> </ol> <p>The SPIL Committee will review these strategies annually and will adjust and further develop the Evaluation Plan as needed.</p>

## **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