

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

## **General Information**

Designated Agency Identification

State: Puerto Rico

Agency: Puerto Rico Vocational Rehabilitation Administration

Plan for: 2017-2019

Submitted in fiscal year: 2016

View grant [90IS0014-01](#) 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.

#### Vocational Rehabilitation Administrator

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.

#### Consejo Estatal de Vida Independiente

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 Lcdo. Ivan A. Clemente Delgado, VRA Administrator.

### 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  
The DSE and the SILC will use the additional State Independent Living Services grant awards funding (that ILA announced in the summer of 2018) to host hearings, forums, and public meetings in accessible locations, to disseminate public-hearings notices through various media outlets, and to provide reasonable accommodations including professional translation services and material in accessible formats. The DSE and the SILC may use some of this additional funding for other costs related to SPIL development.

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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 Evelyn Martinez Fuentes

Title CHAIRPERSON

Signed? Yes

Date signed 06/23/2016

#### Section 9: Signature for DSU Director

Name Lcdo. Ivan A. Clemente Delgado

Title VRA Administrator

Signed? Yes

Date signed 06/23/2016

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

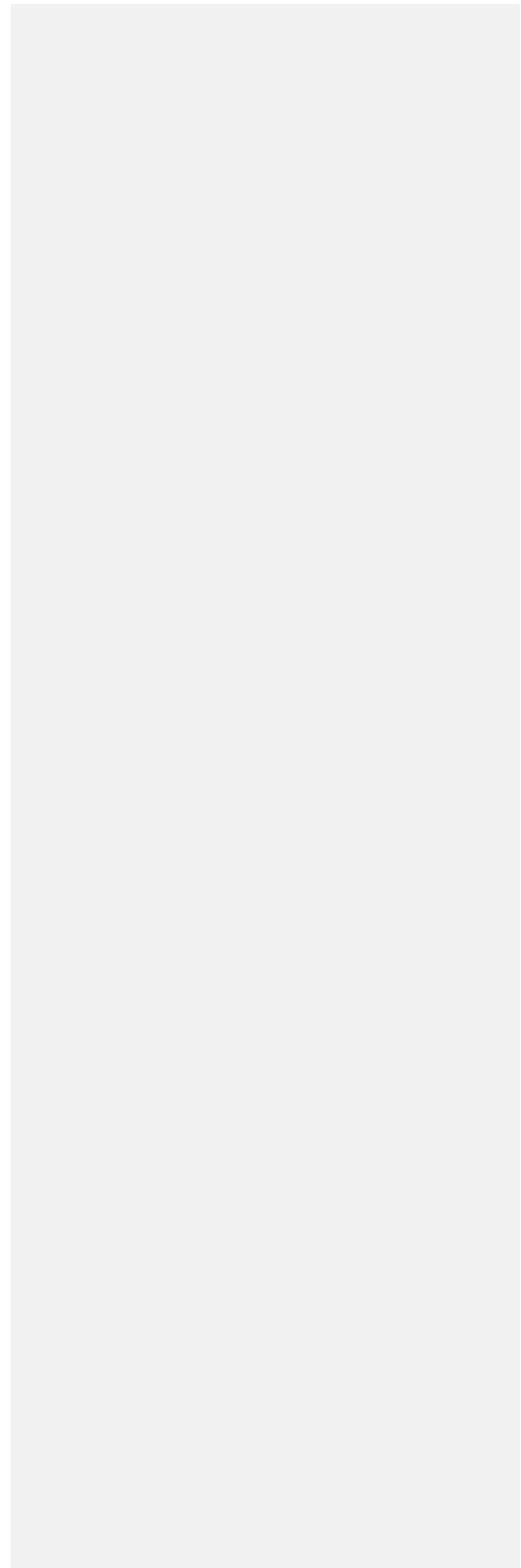
Is there a Separate State Agency for Individuals Who Are Blind?No

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:Mission

Goal Description:

Persons with disabilities in Puerto Rico achieve greater independence, are empowered and take control of their lives in order to increase their integration, inclusion, equality and access to the services and resources in the community.

Goal Name:1

Goal Description:

Persons with disabilities have the necessary independent living services and other complementary services.

Goal Name:2

Goal Description:

Persons with disabilities exercise control in decision-making and intercede for system changes.

Goal Name:3

Goal Description:

The community at large knows about the independent living philosophy and services.

#### **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
1	<p>Objective 1.a: That persons with disabilities receive independent living core services (information and referral, peer counseling, individual and system advocacy, development of independent living skills and transition), and other complementary services.</p> <p>Activities:</p> <p>1.a.1 Provide independent living core services to 2,212 persons with disabilities annually, residents in the service areas of the centers for independent living (CILs) and the community rehabilitation programs (CRPs) subsidized with Part B funds, through a contract with the Vocational Rehabilitation Administration (VRA) each year of the Plan. The CILs and CRPs are the following ones: Centro Pro Vida Independiente (CEPVI) Northwest, CEPVI Southwest, Movimiento para el Alcance de Vida Independiente (MAVI) North Region, MAVI East Region, MAVI Central Region, MAVI Metro Region, and Programa de Asistencia para la Rehabilitacion Educativa y Social (PARES). See Section 3 for details of municipalities served.</p> <p>1.a.2 Create a working committee in 2017 with government agencies (Department of Health, Department of Housing, and Department of Family, among others) and private agencies for the identification of institutionalized persons with disabilities, in order to elaborate strategies aimed at the placement of this population in community homes with the assistance and support needed. This is an activity of the SILC and CILs.</p> <p>1.a.3 Create a Memorandum of Understanding (MOU) in 2017</p> <p>between the CILs and the VRA that promotes the referrals and related services to youth in transition. This is an activity of the CILs and VRA.</p> <p>1.a.4 Facilitate a quarterly meeting of a support group by region for parents and caregivers in order to prevent the institutionalization of persons with disabilities. This is an activity of MAVI.</p>	10/01/2016	09/30/2019

	<p>1.a.5 Provide an annual summer camp impacting 80 persons with disabilities residents in the central, metro and north regions. The participants will apply the independent living skills developed. This is an activity of MAVI.</p> <p>1.a.6 Conduct six (6) annual meetings through the MAVI All Stars Program of the metro region. This program provides the opportunity to develop and demonstrate leadership, self-esteem, empowerment and other independent living skills in the participants.</p> <p>1.a.7 Provide training in literacy annually to thirty (30) persons with disabilities of the MAVI Central and Metro Regions.</p>		
1	<p>Objective 1.b: That persons with disabilities know the community services available.</p> <p>Activities:</p> <p>1.b.1 Guide consumers about the services offered by public/private agencies in their region and how to access them through internet or smart phones. MAVI will conduct four (4) orientation annually per center and PARES will conduct six (6) in its region.</p> <p>1.b.2 Develop and distribute a directory of educational institutions. Forty (40) people will benefit. This is an annual activity of CEPVI.</p> <p>1.b.3 Coordinate visits with the Access to Art for All Program of the Ponce Art Museum. It will impact twenty (20) people annually. This is an activity of CEPVI.</p>	10/01/2016	09/30/2019
1	<p>Objective 1.c: That persons with disabilities have access to health services.</p> <p>Activities:</p> <p>1.c.1 Carry out five (5) annual educational activities in the region served by CEPVI Northwest and four (4) by each CIL related to prevention, good health and physical well-being.</p> <p>1.c.2 Keep the Team MAVI group in the metro region developing quarterly activities of conditioning and physical well-being during the three-year Plan.</p>	10/01/2016	09/30/2019

	<p>1.c.3 Coordinate two (2) participation and social integration activities to impact (40) consumers annually. This is an activity of CEPVI.</p> <p>1.c.4 Coordinate an annual health clinic in all regions served by MAVI and in two (2) of the towns served by PARES.</p> <p>1.c.5 Coordinate orientations or workshops about prevention of domestic violence, crisis management, guidance and legal assistance. This is an activity of CEPVI that will benefit fifteen (15) people annually.</p>		
1	<p>Objective 1.d: That persons with disabilities benefit from accessible transportation services.</p> <p>Activities:</p> <p>1.d.1 Provide transportation services annually to thirty (30) consumers of MAVI Metro Region and to twenty (20) consumers of CEPVI.</p> <p>1.d.2 Provide orientations to the persons with disabilities on the requirements for obtaining a drivers license and removable signs; identification of traffic signals, signs, pedestrians/cyclists rules and road safety. This is an activity that will benefit fifty-five (55) consumers of CEPVI, twenty (20) consumers of CEPVI Northwest and twenty (20) consumers of PARES each year of the Plan.</p> <p>1.d.3 Provide orientation and/or distribute an updated directory of transportation services available to persons with disabilities who reside in the service areas of the CILs and CRPs. The CILs and CRPs will distribute one hundred (100) directories to consumers, public/private agencies and other interest groups, each year of the Plan.</p>	10/01/2016	09/30/2019
1	<p>Objective 1.e: That persons with disabilities have access to assistive technology services (AT).</p> <p>Activities:</p> <p>1.e.1 Coordinate with different agencies the provision of AT services benefiting fifteen (15) persons annually. This is a CEPVI activity.</p> <p>1.e.2 Distribute one hundred (100) directories annually on the AT services available in the community. This is an activity of all CILs.</p>	10/01/2016	09/30/2019

1	<p>Objective 1.f: That persons with disabilities have access to employment.</p> <p>Activities:</p> <p>1.f.1 Provide supported employment services to twenty-five (25) persons with disabilities referred by the VRA. MAVI will offer services to ten (10) consumers and PARES to fifteen (15) consumers, each year of the Plan.</p> <p>1.f.2 Provide orientation services about Ticket to Work to three hundred (300) beneficiaries of the Social Security Disability Insurance through the WIPA Program. This is an annual activity of MAVI.</p> <p>1.f.3 Support employment efforts annually for ten (10) beneficiaries of the Social Security Disability Insurance by activating their Ticket to Work. This is an activity of MAVI Metro Region.</p> <p>1.f.4 Offer an activity on the subject of employment. CEPVI will impact forty (40) persons and CEPVI Northwest will impact fifteen (15) persons annually.</p> <p>1.f.5 Educate fourteen (14) employers per year on the American with Disabilities Act (ADA) requirement of employing persons with disabilities. MAVI will provide orientation to four (4) employers and PARES to ten (10) employers.</p>	10/01/2016	09/30/2019
2	<p>Objective 2.a: That persons with disabilities know their rights and responsibilities.</p> <p>Activities:</p> <p>2.a.1 Offer two (2) workshops on the rights established in ADA, The Bill of Rights of Persons with Disabilities (Law 238 of August 31 of 2014, as amended), and other laws protecting the rights of persons with disabilities. This is an activity of the CILs and CRPs and will impact one hundred twenty (120) personnas per year.</p> <p>2.a.2 Provide orientation to twenty-five (25) consumers annually on topics related to safety and emergency management. This is an activity of the CILs.</p> <p>2.a.3 Offer two (2) annual activities aimed at self-management and empowerment. This is an activity of MAVI.</p>	10/01/2016	09/30/2019

2	<p>Objective 2.b: That persons with disabilities intercede for their rights.</p> <p>Activities:</p> <p>2.b.1 Carry out one (1) quarterly activity on development and training of young leaders in each region. This is an activity of MAVI.</p> <p>2.b.2 Carry out, during 2018, one (1) residential camp on leadership training for fifteen (15) youth with disabilities between the ages of 18 and 24. This is an activity of MAVI.</p> <p>2.b.3 Hold an annual activity on advocacy titled: Defending Our Inclusion in the House of Laws as part of the celebration of the Independent Living Week. One hundred (100) people will participate in the activity. This is an activity of the CILs, CRPs and SILC.</p> <p>2.b.4 Carry out one (1) annual advocacy activity per region with the participation of five (5) consumers, in order to promote an increase in alternatives of accessible transportation. This is an activity of MAVI.</p> <p>2.b.5 Achieve annual participation of eighteen (18) persons with disabilities in community advocacy activities such as public hearings, presentations on radio and television programs, among others. CEPVI will impact ten (10) persons and CEPVI Northwest will impact eight (8) persons.</p>	10/01/2016	09/30/2019
2	<p>Objective 2.c: That persons with disabilities have greater access to housing services.</p> <p>Activities:</p> <p>2.c.1 Carry out in 2017, one (1) awareness activity on accessible housing for contractors and designers. This is an activity of MAVIs and SILC.</p> <p>2.c.2 Create and disseminate, through social networks in 2017, an informative capsule to raise awareness on the benefits of a universal housing design. This is an activity of MAVI and SILC.</p> <p>2.c.3 Coordinate one (1) activity on the subject of housing. The activity will impact twenty (20) people annually. This is an activity of CEPVI.</p>	10/01/2016	09/30/2019

2	<p>Objective 2.d: That persons with disabilities express their needs and satisfaction for services received.</p> <p>Activities:</p> <p>2.d.1 Conduct satisfaction surveys to twenty-five percent (25%) of the consumers served in the CILs and CRPs, during the three years of the Plan.</p> <p>2.d.2 Conduct a needs study in the CILs, CRPs and SILC during 2019 through surveys, focal groups and other means available.</p>	10/01/2016	09/30/2019
3	<p>Objective 3.a: That the community knows about the independent living philosophy and services and other related information.</p> <p>Activities:</p> <p>3.a.1 Provide eight (8) orientations annually per region on the independent living philosophy and services of the CILs, including at least a group of veterans. This is an activity of the CILs and CRPs.</p> <p>3.a.2 Provide courses in basic sign language and deaf culture annually to forty (40) from the community served by MAVI.</p> <p>3.a.3 Organize and celebrate annually the Independent Living Week, in full compliance with Law No.54 of April 11 of 2002. This law designates the first week of May each year as Independent Living Week and establishes that the VRA, SILC, Office of the Ombudsman for Persons with Disabilities, CILs and other agencies represented in the SILC, will carry out activities to create awareness on how the independent living services contribute to the effective integration of persons with disabilities into society.</p> <p>3.a.4 Use the media available to provide orientation on the independent living philosophy and services and how these impact the life of persons with disabilities. This is a monthly activity of the CILs and CRPs to be carried out each year of the Plan.</p> <p>3.a.5 Maintain, during the three-year (3) Plan, a web page accessible to present information about the independent living philosophy, services and other information of</p>	10/01/2016	09/30/2019

	<p>interest to persons with disabilities. This is an activity of the CILs and SILC.</p> <p>3.a.6 Continue the annual campaign of orientation and dissemination of the CEPVI Llega a Ti services, visiting the eight (8) municipalities comprising the southern region.</p> <p>3.a.7 Provide opportunity to three (3) university students of the southern region to carry out an internship in CEPVI with the purpose of knowing and disseminating the independent living services, each year of the Plan.</p> <p>3.a.8 Participate in five (5) service fairs annually in the municipalities served by CEPVI and CEPVI Northwest and in two (2) municipalities served by PARES.</p> <p>3.a.9 Participate in the Annual NCIL Activity with the purpose of increasing knowledge on issues related to the independent living philosophy, and to exchange information about innovative projects and models that promote the dissemination of the independent living philosophy. This is an activity of CEVI and MAVI.</p>		
3	<p>Objective 3.b: That the community is aware on the rights and dignity towards persons with disabilities.</p> <p>Activities:</p> <p>3.b.1 Provide four (4) talks per year by region on sensitivity, ADA and other related laws. This is an activity of the CILs and CRPs that will impact twenty (20) people each year of the Plan.</p> <p>3.b.2 Create and disseminate, through social media, an informative capsule encouraging sensitivity towards persons with disabilities. This is an activity of MAVI and will take place in 2018.</p> <p>3.b.3 Publish in the CEVI DICE bulletin the approved laws and draft legislation filed to benefit persons with disabilities. This will be done in each edition of the bulletin impacting 3,000 people per edition each year of the Plan.</p> <p>3.b.4 Keep updated and in all formats a compendium of State and Federal laws that protect the population with disabilities. This is an activity of the SILC.</p>	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

We have identified, as a priority for outreach efforts, those institutionalized persons with disabilities within the areas served by the CILs and CRPs. It has been determined that to reach this population, a work plan will be established with public agencies such as the Department of Health, Department of Housing and Department of the Family, as well as with other private entities, for the purpose of: 1. Ensuring the identification of the population with disabilities who is institutionalized. 2. Developing a profile of the population which includes age groups, socioeconomic situation, family composition and other relevant data. 3. Identifying community resources and supports available. 4. Establishing collaborative agreements with public/private agencies to facilitate the transition to community homes. 5. Providing independent living skills services in order to maintain this population integrated into the community. The efforts to reach this population will continue during the three-year Plan, although the priority may change from year to year based on community needs and availability of funds.

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

Priority attention will be given to the geographic areas where there are persons with disabilities who are institutionalized. The CILs and CRPs will undertake outreach efforts in the municipalities that comprise their service areas, especially in those areas more distant to the municipality where the CIL is located, which traditionally have been identified as unserved or underserved.

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

In relation to minority groups, both the SILC and CILs as the VRA, are committed with the participation of these groups in all aspects involving the independent living movement and services. Puerto Rico is considered a Hispanic country where 99% of its population speaks Spanish. Most immigrants come from the Dominican Republic and Cuba, both Spanish-speaking countries, and being Puerto Rico also Spanish-speaking, it is not considered necessary to implement a special program to communicate with this immigrant population. These minority groups reside integrated with the rest of the population and therefore have access to the independent living services offered on the Island.

### **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	40911	249171		15268
Title VII Funds Chapter 1, Part C			839761	
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)	40000			
Other Federal funds - other		270000		
Non-Federal funds - State funds		514584		1557
Non-Federal funds - Other		84000		
Total	80911	1117755	839761	16825

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	40911	249171		15268
Title VII Funds Chapter 1, Part C			839761	

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)	40000			
Other Federal funds - other		270000		
Non-Federal funds - State funds		514584		1557
Non-Federal funds - Other		84000		
Total	80911	1117755	839761	16825

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	40911	249171		15268
Title VII Funds Chapter 1, Part C			839761	
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)	40000			
Other Federal funds - other		270000		
Non-Federal funds - State funds		514584		1557
Non-Federal funds - Other		84000		
Total	80911	1117755	839761	16825

**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.**

The Financial Tables presented have been developed based on estimated budget allocations for the VRA, SILC and CILs.

#### Part B Funds Independent Living Services

The VRA will use the amount of \$15,268 of Part B funds and \$1,557 of State matching funds, for a total of \$16,825, in order to provide administrative support to the centers for independent living (CILs) and other service providers funded under Part B, as described in Section 4.1A.

The amount of \$249,171 of Part B funds allocated and \$29,584 of State matching funds will be used each year of the Plan for the contracting of independent living service providers, for a total of \$278,755, as described in Section 2.2A. This will support all objectives detailed in Section 1.2A.

The SILC will use \$40,911 of Part B funds and \$40,000 of Innovation and Expansion funds, for a total of \$80,911, to perform the functions detailed in Section 705 of the Rehabilitation Act of 1973, as amended and support the following objectives:

Objective 1.a: That persons with disabilities receive independent living core services (information and referral, peer counseling, individual and system advocacy, development of independent living skills and transition), and other complementary services.

Objective 2.b: That persons with disabilities intercede for their rights.

Objective 2.c: That persons with disabilities have greater access to housing services.

Objective 3.a: That the community at large knows about the independent living philosophy and services and other related information.

Objective 3.b: That the community is aware on the rights and dignity towards persons with disabilities.

#### Part C Funds General Operations of the CILs

A total of \$839,761 of Part C funds is received annually for the general operations of the centers distributed as follows:

- a. MAVI Metro Region \$422,670
- b. MAVI North Region \$126,724
- c. CEPVI \$290,367

These Part C funds will be used to support all objectives of this Plan.

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

The independent living services offered in Puerto Rico are funded with Part B and Part C funds of Title VII of the Rehabilitation Act of 1973, as amended. It is estimated that for fiscal years 2017 to 2019, a total of \$305,350 of Part B funds and a total of \$839,761 of Part C funds will be received.

The CILs, on their part, will maximize the availability of funds from all possible sources to meet the needs of persons with significant disabilities. To achieve this task, the centers access other Federal, State and private funds as follows:

1. Federal funds, in the amount of \$270,000, coming from the Work Incentives Planning and Assistance (WIPA) Program for beneficiaries of the Social Security Disability Insurance, in order to support Objective 1.f: That persons with disabilities have access to employment.

2. State funds in the amount of \$516,141:

a. Funds coming from the Special Joint Committee on Legislative Donations, in the amount of \$50,000, to support the following objectives: Objective 1.a: That persons with disabilities receive independent living core services (information and referral, peer counseling, individual and system advocacy, development of independent living skills and transition), and other complementary services; and Objective 1.d: That persons with disabilities benefit from accessible transportation services.

b. Funds coming from the Supported Employment Program of the VRA, in the amount of \$400,000, to support Objective 1.f: That persons with disabilities have access to employment.

c. State funds in the amount of \$31,141. Of these, \$1,696 will be used by the VRA as the DSU to provide administrative support to the independent living programs under Title VII. The remaining \$29, 445 will be used to provide direct services of independent living through the CILs and other contracted service providers.

d. Funds coming from the Division of Adult Education of the Department of Education of Puerto Rico, in the amount of \$35,000, to support Objective 1.a: That the persons with disabilities receive independent living core services (information and referral, peer counseling, individual and system advocacy, development of independent living skills and transition), and other complementary services.

3. Private funds in the amount of \$84,000:

a. Funds coming from United Funds, in the amount of \$23,000, to support Objective 1.a: That persons with disabilities receive independent living core services (information and referral, peer counseling, individual and system advocacy, development of independent living skills and transition), and other complementary services.

b. Funds coming from the Disability Institute of Cornell University, in the amount of \$48,000, to support Objective 2.a: That persons with disabilities know their rights and responsibilities.

c. The CILs also carry out fundraising activities to support their general operations. The total raised is estimated at \$13,000 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 CILs receive other in-kind contributions to support their operations, including volunteer staff for direct services and administrative support; in addition to office space, as part of the collaborative initiatives with other community entities.

Upon approval of this Plan and to support the SILC resource plan, the VRA will provide as an in-kind contribution the physical space to relocate the SILC Office.

**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.**

The objectives established in the State Plan for Independent Living (SPIL) are consistent with and advance the purposes of Chapter 1 of Title VII of the Rehabilitation Act as described below:

- a. The CILs will carry out activities to promote the independent living philosophy as described in Objectives 2.a, 2.b, 2.d and 3.a.
- b. The CILs will provide independent living services as established in Objective 1.a.
- c. The VRA will provide administrative support to strengthen the CILs network as described in Objective 1.a.
- d. Collaborative and coordination activities will be promoted with other public and private entities in order to maximize the scope of services as described in Sections 1.5 and 1.6.

**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 SILC and CILs directors ensure that, in the development of the State Plan for Independent Living (SPIL), they have been one hundred percent in agreement with the incorporation of the objectives established by the CILs as detailed in Section 701 of the Rehabilitation Act and 34 CFR 364.2. The objectives of the CILs are discussed and incorporated during the process of preparation of the plan as follows:

- a. A working committee was established for the development of the State plan consisting of the representatives of CILs, VRA as the DSE, SILC president and the SPIL Committee of the SILC.
- b. The CILs conducted focus groups in each service region to offer participation to citizens with disabilities in the determination of needs to be incorporated into the Plan.
- c. The committee met to discuss the mission, goals and objectives following the logic model.
- d. Each CIL submitted its activities and compliance levels and they were subsequently discussed together.
- e. Each CIL identified the different sources of funds and their uses.
- f. The directors of CILs and the president of SILC met to develop the different sections of the SPIL.
- g. The doubts about the information submitted by each CIL were consulted and clarified via telephone and email.
- h. A draft of the State plan was submitted to each member of the working committee, prior to the holding of public hearings, for due revisions and comments.
- i. A summary of the comments received at public hearings was also sent to each CIL director.

### **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.

This State plan recognizes and affirms the need to strengthen the ties of coordination and collaboration, therefore, the SILC, CILs and VRA will undertake efforts in order to maximize the scope of the independent living programs; achieve system changes that benefit persons with disabilities; and increase the support of the wider community. All with the purpose of facilitating the provision of services in order to meet the needs that limit the integration of the population with disabilities into society.

Described below are the collaboration and coordination efforts among several entities:

1. The SILC and CILs will meet, at least twice a year, with representatives of the following agencies and entities to discuss service strategies that meet identified needs of the population

with disabilities: Department of Transportation and Public Works, Department of Housing, Department of the Family, Department of Education, Puerto Rico Police, Office of the Ombudsman for Persons with Disabilities, Department of Recreation and Sports, and Puerto Rico Assistive Technology Program, among others.

2. The VRA will continue as an active member of the State Council on Developmental Disabilities thus contributing to expand the provision of services offered to the population with developmental disabilities.

3. The SILC and represented State agencies will collaborate and coordinate activities in accordance with the objectives outlined in this Plan.

4. In full compliance with applicable regulations, a member of the SILC is designated as representative on the Puerto Rico State Rehabilitation Council (PRSRC).

5. For the purpose of extending the provision of independent living services in unserved areas, the municipalities of Aguas Buenas, Anasco, Caguas, Comer?o, Culebra, Dorado, Guayama, Humacao, Naranjito, Rio Grande and Vieques will collaborate with the CILs and CRPs to provide free of charge office space and utilities for the offering of independent living services in the central, east, west and north central areas. The municipalities of Vieques and Culebra will also provide transportation to the staff of MAVI East.

6. The VRA and CILs will continue collaborating with the Institute of Developmental Disabilities in the development of innovative service programs.

7. In compliance with the new provisions contained in the Rehabilitation Act, the SILC will:

a. Collaborate with the CILs to increase public awareness about the needs of the population with disabilities, their inclusion into society and dignified treatment, through campaigns in the available media.

b. Promote, together with the CILS, the sensitivity towards persons with disabilities through the publication of various topics in the CEVI DICE bulletin.

c. Increase knowledge about the existing community resources through the dissemination of information and the publication of these on the electronic page.

## **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 SILC, CILs and VRA will maximize their efforts to increase the coordination among agencies and organizations, with the aim of avoiding duplication of existing and available

services in the community. As a result of these collaborations, the best use of funds received is planned together in order to provide services that otherwise would not receive those persons with disabilities.

The participation of SILC members, CILs staff and VRA in various committees, councils and organizations reduces duplication of efforts among organizations and keeps the parties informed on the various situations and issues that interest and affect persons with disabilities.

Some of the most significant efforts to avoid duplication and coordinate efforts are described below:

#### Special Education

Each CIL has links to special education programs of their service areas, in order to develop a variety of collaborative initiatives such as: providing workshops in transition into adulthood and offering orientations to parents for the development of service plans, among other areas of interest.

#### Vocational Education

The CILs have established links with educational institutions for the referral of those consumers who express interest in developing a vocational goal.

#### Housing

The CILs provide orientation on the eligibility requirements and thus refer to the corresponding state and municipal agencies those consumers who indicate to have a need for housing. No CIL in Puerto Rico administers housing programs. Also, the CILs refer to the Department of Housing those consumers in need of home modifications.

#### Nutrition Workshops

MAVI coordinates annual workshops related to the area of nutrition with the School of Family Ecology and Nutrition, Agricultural Extension Service of the University of Puerto Rico and the Department of Health.

#### Transportation

The CILs provide orientation on the eligibility requirements and thus refer to services those consumers who request accessible transportation if available in their service areas. These centers have developed directories of transportation services and other related activities. See Objective 1.d.

#### Legal Services



A collaborative relationship is maintained with the Office of Legal Services of Puerto Rico to benefit MAVI consumers with cost-free legal services.

#### Developmental Disabilities

Through an interagency memorandum of understanding (MOU), the representative of the VRA collaborates with the State Council on Developmental Disabilities in the development of subsidized community rehabilitation programs to provide services in areas of emphasis according to its most recent Five-year Strategic Plan for the Years 2017-2021. Such services include: employment, formal/informal services and supports, health, transportation, education and early intervention, recreation, child care and housing.

#### Equipment Donations

The CILs refer low-income consumers who are in need of medical equipment and other services to the Dar Foundation, Accion Social, and to the Puerto Rico Chapter of the Paralyzed Veterans of America, among other organizations.

The MAVI centers refer consumers for evaluation and equipment donations to the Equipment Recycling Program of the Puerto Rico Assistive Technology Program (PRATP).

#### Health

See Objective 1.c.

#### Social Security

The CILs coordinate talks for consumers on Social Security Disability and other related matters with the central and/or regional offices established on the Island.

#### Mental Health

MAVI has established collaborative agreements for the referral of consumers to mental health programs such as those offered by the American Psychology Services (APS) and the Puerto Rico Administration of Mental Health and Anti-Addiction Services, among other institutions.

#### Services to Blind Persons

The CILs will offer, identify and establish partnerships with community agencies and organizations for the referral of those consumers who require mobility training.

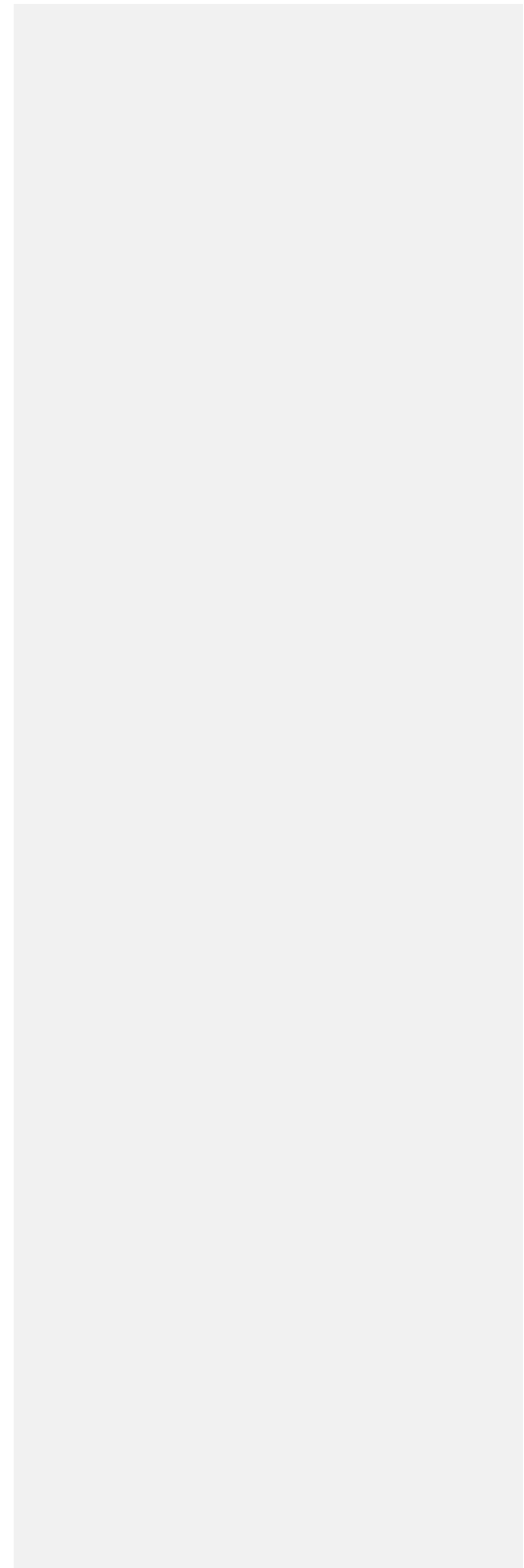
#### Services to Veterans

The CILs will provide orientation to veterans on the services and benefits to which they are entitled. They will also refer to other agencies for services not available in the centers, as established in Objective 3.a.

### **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.

N/A



## 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	Yes
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	No	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	No
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	Yes	Yes
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	No	Yes	Yes
Services for children with significant disabilities	No	No	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	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.

It has been identified as a priority service that of transition for institutionalized persons with disabilities within the areas served by the CILs and CRPs, as described in Section 1.2B. Any other service priority will be determined by each CIL according to the particular needs of its service area and the economic resources available.

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 SILC along with the CILs have decided to use Part B funds for the provision of independent living services by contracting of independent living centers funded by Part C and other service providers, under the provisions of Title VII, Chapter 1. This contracting will depend on obtaining and maintaining of the Part B funds allocated annually.

The contractual agreements for fiscal years (FYs) 2017, 2018 and 2019 with the CILs and CRPs for the provision of information, referral and independent living services totalize the amount of \$278,755 to be distributed as follows:

MAVI Central Region \$77,361

MAVI East Region \$77,361

CEPVI Northwest \$53,894

CEPVI Southwest \$30,139

PARES \$40,000

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.

N/A

## **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.

In Puerto Rico, there are three (3) CILs funded with Part C and two (2) CILs funded with Part B, all under provisions of Section 725 of Title VII of the Rehabilitation Act, as amended. The three (3) CILs funded with Part C are: MAVI Metro Region, MAVI North Region and CEPVI. The two (2) CILs funded with Part B are: MAVI East Region and MAVI Central Region.

Each CIL has a defined service area consisting of a number of municipalities. The Census data included were obtained from estimates prepared by the US Census Bureau for 2015.

The CILs funded with Part C are:

#### MAVI Metro Region

This MAVI, SPIL signatory, offers services to persons who reside in the San Juan Metropolitan Area and in the following municipalities: Bayamon, Carolina, Catano, Guaynabo, Toa Baja and Trujillo Alto. The funds to serve this population come from Part C of Title VII of the Rehabilitation Act, as amended. The complementary services provided are subsidized with State funds, other Federal funds and funds from private sources.

The area served has an approximate population of 1,002,995. It is estimated that 110,125 persons, between the ages of 18 to 64, have some type of disability.

The center receives funds totaling \$653,670; of these, \$422,670 are Part C funds and \$231,000 are State funds and other private sources.

#### MAVI North Region

This MAVI serves the northern area of the Island with a CIL located in Arecibo that shares the same governing board of MAVI Metro Region. This services provision is subsidized with Part C funds in the amount of \$126,724 and other Federal funds, State funds and private sources.

The municipalities served are: Arecibo, Barceloneta, Camuy, Ciales, Corozal, Florida, Hatillo, Lares, Manati, Morovis, Quebradillas, Utuado, Vega Alta and Vega Baja. The area served has an approximate population of 516,201. It is estimated that 56,671 persons, between the ages of 18 to 64 have some type of disability.

The center receives Part C funds totaling \$126,724.

## CEPVI

CEPVI, SPIL signatory, serves the southern area of the Island. The independent living core services are funded under Part C of Title VII of the Rehabilitation Act, as amended. The complementary services provided are subsidized with State funds, other Federal funds and private sources.

The municipalities served are: Guanica, Guayanilla, Jayuya, Juana Diaz, Penuelas, Ponce, Villalba and Yauco. This served area has an approximate population of 340,804. It is estimated that 37,417 persons, between the ages of 18-64, have some type of disability.

The center receives funds totaling \$309,367; of these, \$290,367 are Part C funds and \$19,000 are State funds.

The CILs funded with Part B funds are:

### MAVI East Region

MAVI Metro Region, in collaboration with the VRA, established a CIL in the east area. This services provision is subsidized with Part B funds. Also, MAVI Metro Region accesses funds from private sources to support the provision of services. The area served covers municipalities not considered in the original services proposal of MAVI Metro Region.

The municipalities served are: Canovanas, Ceiba, Culebra, Fajardo, Humacao, Juncos, Las Piedras, Loiza, Luquillo, Maunabo, Naguabo, Rio Grande, San Lorenzo, Vieques and Yabucoa.

The area served has an approximately population of 460,000. It is estimated that 50,514 persons, between the ages of 18-64, have some type of disability.

The center received for FY 2016 the amount of \$54,000 from Part B funds. From the approval of this Plan, it will receive \$77,361.

### MAVI Central Region

MAVI Metro Region, in collaboration with the VRA, established a CIL in the central area. This area includes municipalities located in the mountainous area of the Island not considered in the original services proposal of MAVI Metro Region. The provision of services is subsidized with Part B funds. Likewise, MAVI Metro Region accesses State funds to support the provision of services.

The municipalities served are: Aibonito, Aguas Buenas, Arroyo, Caguas, Cayey, Cidra, Guayama, Gurabo, Patillas and Salinas. The service area has an approximate population of 443,196. It is estimated that 48,657 persons, between the ages of 18-64, have some type of disability.



The center received for FY 2016 the amount of \$54,000 from Part B funds. From the approval of this Plan, it will receive \$77,361.

### 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).

Puerto Rico has 78 municipalities. Of these, 54 are being served by the CILs which comply with the provisions of Section 725 of Title VII of the Rehabilitation Act, as amended. These CILs are funded with Part B funds and Part C funds of Title VII, other Federal and State funds and funds from private sources. From these 54 municipalities, 25 are being served with Part B funds for CILs of the MAVI Central and MAVI East Region, as described in Section 3.1.

Therefore, there are 24 municipalities (31% of the total number of municipalities) that do not have access to independent living core services. These are the following:

Northwest Area which includes the following municipalities: Aguada, Aguadilla, Anasco, Isabela, Las Marias, Mayaguez, Moca, Rincon and San Sebastian.

Total number of municipalities: 9

Population: 361,834

Estimated population with disabilities between the ages of 18 to 64: 39,725

Partially served area by an Office of Information and Referral subsidized with Part B funds in collaboration with CEPVI.

Southwest Area which includes the following municipalities: Cabo Rojo, Hormigueros, Lajas, Maricao, Sabana Grande and San German.

Total number of municipalities: 6

Population: 157,725

Estimated population with disabilities between the ages of 18-64: 17,315

Area that has traditionally been totally devoid of services. From the approval of this SPIL, it will be partially served by an Office of Information and Referral subsidized with Part B funds in collaboration with CEPVI.

North Central Area which includes the following municipalities: Comer?o, Barranquitas, Dorado, Naranjito, Orocovis and Toa Alta.

Total number of municipalities: 6

Population: 220,264

Estimated population with disabilities between the ages of 18 to 64: 24,182

Partially served area by an Office of Information and Referral subsidized with Part B funds in collaboration with a CPR known as PARES (Programa de Asistencia para la Rehabilitacion Educativa y Social).

Southern Area which includes the following municipalities: Adjuntas, Santa Isabel and Coamo.

Total number of municipalities: 3

Population: 83,224

Estimated population with disabilities between the ages of 18 to 64: 9,136

Area that in the past three years has been totally devoid of independent living services. From the approval of this SPIL, it will be partially served with information and referral services in collaboration with CEPVI.

The eastern and central areas, as described in Section 3.1, depend in Part B funds to provide independent living services. The two CILs funded with Part B offer all core services established in Section 725 of the Rehabilitation Act, as amended. The CILs mostly offer services in the nearby municipalities to their offices, as the level of funding does not allow them to impact a greater number of persons with disabilities, as well as to carry out more outreach activities. Despite the efforts made through fundraising activities and identification of other fiscal resources, it is anticipated that the continuity of funding received from State sources could be compromised due to the fiscal crisis undergone by the Government of Puerto Rico. Although all efforts are made to reach all municipalities more distant to the CILs, these are considered as underserved.

That is why, when analyzing the served and underserved geographical areas, it was determined that the order of priority for the establishment of a new CIL with Part C funds, if additional funds are available, will be the east and central areas, in this order. This does not preclude that if there is a Part C funded CIL which closes its operations, the area devoid of services will have the preference within this order of priority.

In addition, to establish the minimum funding level, the SILC and CILs have taken into consideration the minimum funding level established by the Association of Rural Programs of Independent Living (APRIL) and the actual expenditures of the last center established with Part C funds, MAVI North Region; when at an optimum time had \$200,000 from Part C funds and ARRA funds for its operations.

Taking both factors into consideration, it has been determined that the minimum funding level for a CIL in Puerto Rico is \$250,000. This funding level also took into consideration that all underserved areas are composed of municipalities with few or no accessible transportation system, few or no service providers and few or no other community services aimed at the population with disabilities. This represents a great challenge in terms of services to meet the needs of persons with disabilities in these service regions.

Therefore, it has been decided that no CIL will have a minimum funding level of not less than \$250,000 from Part C. The priorities for the use of new funds under Title VII, Part C will be as follows:

To increase Part C funding of the MAVI North Center. In addition, it has been decided that the existing CILs located in the East and Central Regions that comply with the standards and indicators of Section 725 of the Rehabilitation Act, as amended, receive Part C funds so that these centers reach the minimum level of funding. Both CILs have been recognized and have proven to be an alternative for public/private/municipal agencies, as well as for consumers who have received the services they need. Therefore, it is timely and urgent to increase their budgetary allocations so that they can have greater outreach of the population to serve within their service areas. Given the above, it has been decided that the new Part C funds will be distributed in the following order to:

- a. To assign \$123,276 to MAVI North in order to carry its current funding level of \$126,724 to the established minimum level of \$250,000.
- b. To turn MAVI East into a Part C CIL, through a competitive process in the east area.
- c. To turn MAVI Central into a Part C CIL, through a competitive process in the central area.

It is emphasized that, when turning MAVI East and MAVI Central into complete and separate CILs subsidized with Part C funds, the Part B funds currently allocated to these CILs will be redistributed among CEPVI Northwest, CEPVI Southwest and PARES North Central. By increasing budgetary allocations to these three (3) service providers and with the necessary supports, they could expand their service offerings and the number of the population to be served in all municipalities assigned to their regions, in order to achieve compliance with the indicators and assurances contained in Section 725 of the Rehabilitation Act, as amended.

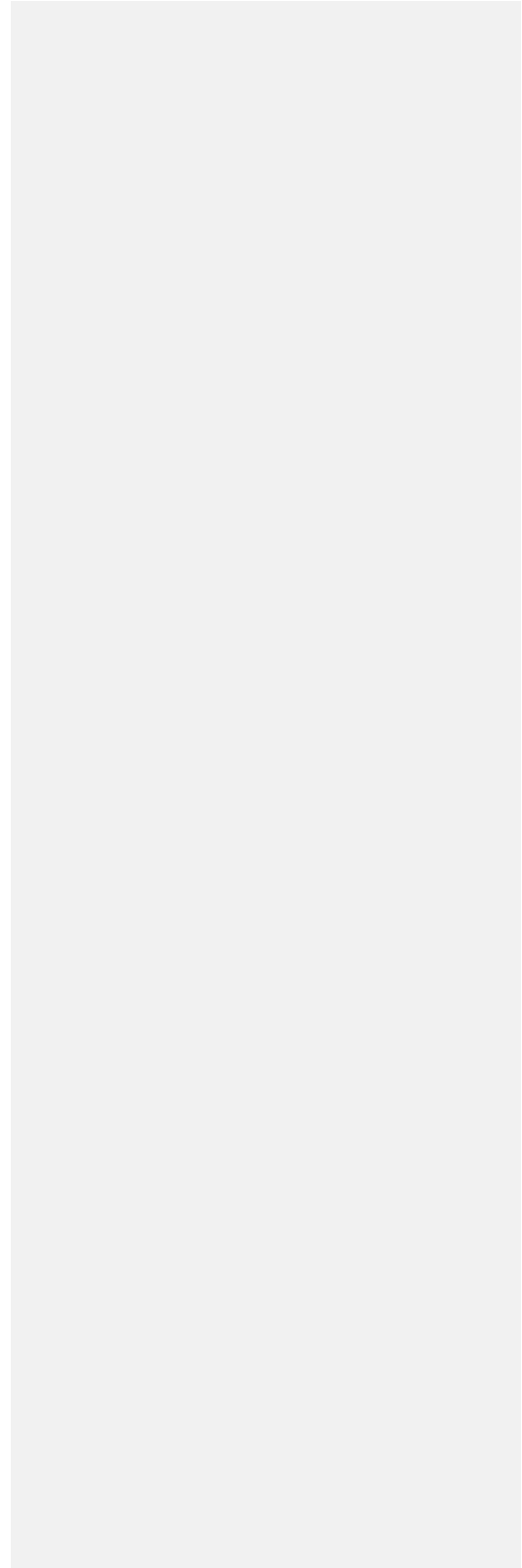
### 3.3 Section 723 States Only

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 VRA has agreed to remain as the Designated State Entity (DSE), so it will continue to provide administrative support as set out in Section 704 of the Rehabilitation Act, as amended by the Workforce Innovation and Opportunity Act (WIOA). The following are the commitments of the VRA:

#### Financial Support:

Will receive, be held accountable and distribute the funds received by the State under the Part B of the Rehabilitation Act, as amended, based on the approved plan.

Will retain 5% of the Part B funds and of the corresponding 10% of the State share to carry out the outlined functions, as set out in the proposed legislation.

Will provide \$40,000 from Innovation and Expansion (I&E) funds of Title I for the operations of the SILC.

#### Technical Assistance:

Will appoint a representative that will serve as an active ex-officio member on the SILC.

Will provide technical assistance in the preparation of programmatic and fiscal reports to the CILs and other providers subsidized with Part B funds, in order to ensure compliance with contractual requirements.

#### Budget Development:

Will prepare, together with the SILC, the plan for the provision of resources, including employees and staff necessary to fulfill its duties and statutory obligations, as authorized in the State Plan.

#### Evaluation of the Activities of the CILs Subsidized under Part B:

Will evaluate the implementation of the procedures established by the CILs and other providers subsidized under Part B for the provision of independent living services and the compliance of guarantees and indicators of Section 725, through fiscal and programmatic monitoring visits and required follow up reports.

Will collaborate, if required, with the Administration of Community Living in the monitoring process to ensure compliance of the CILs with the standards of Section 725, as well as with other Federal and State regulations.

Financial Management/Audits:

Will audit, in accordance with the SPIL, the administration of the funds allocated to the CILs, other contracted providers and to the SILC through monitoring visits.

Will implement the fiscal control procedures and accounting of funds necessary to ensure proper disbursement and accounting of Federal funds provided to the CILs, SILC and other service providers under the independent living services program.

Maintenance of Records:

Will receive, deposit and distribute the State and Federal funds according to the SPIL approved, under State and Federal laws and in compliance with fiscal regulations set forth in 45 CFR Part 75 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Health and Human Services Awards).

Will keep the administrative and financial reports as set forth under Title VII of the Rehabilitation Act, as amended by WIOA and allows access to such documents, as the Administrator deems appropriate.

Will submit additional information or will provide those assurances that the Administrator may require with regard to the programs.

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 VRA, as the DSE, will allocate funds to the SILC in the amount of \$40,000 from Innovation and Expansion and \$ 40,911 from Part B, for a total of \$80,911 per year; in order to carry out the functions described in section 705 of the Rehabilitation Act of 1973, as amended. The funds received will be used to cover the following expenses:

- a. Personnel-includes the salary and fringe benefits of SILC staff. The fringe benefits include contribution to Social Security, Non-Occupational Temporary Disability Insurance (known in Spanish as SINOT), State Insurance Fund, regular vacations, sick leave and Christmas bonus. The SILC operates with an executive director, a full-time secretary and an accountant hired under professional services.
- b. Office-includes office materials, phone, postage, and purchase/rental/repair of office equipment.
- c. Compensation and Other Expenses -the SILC members receive no remuneration whatsoever for the performance of their duties in the Council. Those members who are not public employees and who do not receive income during the course of official duties of the SILC, shall be entitled to compensation for each day of official meeting of the SILC or its working committees; and for attending activities or official dealings that are entrusted by the SILC. Other reasonable expenses incurred, such as dependent care or personal assistant services may be covered. The latter would require prior authorization accompanied by appropriate documentation for approval.

The ex-officio members of the SILC shall be entitled to diet and mileage in accordance with the applicable regulations of the Treasury Department of Puerto Rico.

- d. Forums and other activities that may be necessary to carry out the functions assigned by law.
- e. Other expenses related to the operation of the SILC (NCIL annual fee, newsletter, insurance, and the reimbursement of expenses to director, secretary and others).

f. Support the objectives and activities of plan consistent with its functions as described in section 1.3 B.

g. Achieve the incorporation of the SILC in order to implement a resource development plan to support its activities and collaborate with the CILs in fundraising activities that contribute to offer more independent living services.

h. Compete in proposals that provide funding to support the operations of the SILC or the CILs.

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

- The SILC's responsibility for the proper expenditure of funds and use of resources that it receives under the resource plan.

The procedures for the use of the funds allocated are described in the "Manual of Administrative Practices of the SILC":

The SILC maintains a bank account in a commercial bank used for the payment of personnel and other expenses.

All issued check is signed by two (2) of the three (3) persons authorized to do so: president, treasurer, and executive director.

All check to be issued requires prior authorization of the treasurer, president or executive director.

Quarterly financial reports are sent as required by the VRA.

At each ordinary meeting of the SILC, the treasurer presents an expense report by item of cost.

The expense budget is evaluated at least once a year for the corresponding adjustments to each item.

Each purchase of equipment or expense not included in the budget prepared at the beginning of the fiscal year, is authorized by the plenary council.

The SILC is audited by the VRA and as a result, corrective actions are taken as requested in the audit report received.

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

A written Agreement of Understanding will be renewed to ensure the independence of the SILC with regard to the Designated State Entity and the Department of Labor and Human Resources. The Agreement will be signed by the parties during FY 2016.



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

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The resource plan is based on the allocation of funds received in the current fiscal year and is subject to continue receiving the same amount allocated. It has been developed under the understanding that the VRA will allocate \$40,000 of Innovation and Expansion funds and \$40,911 of Part B funds for each year of the Plan. If these allocations cease, decrease or increase, the SILC and the CILs will revise the funding amounts included in the SPIL.

## 5.2 Establishment and Placement

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

The SILC was established on September 27 of 1993 by the Executive Order 1993-44 issued by the Honorable Governor of the Commonwealth of Puerto Rico. This Order was amended in April of 2014. Its amendments were submitted to the VRA. It is not currently registered in the State Department of Puerto Rico as a non-profit institution, although its activities are nonprofit. One of the activities of the SILC under this plan is its incorporation following the procedures established by the State Department of Puerto Rico.

The SILC is an autonomous body that together with the VRA, agency within the Department of Labor and Human Resources of the Commonwealth of Puerto Rico, handles all matters concerning the development and provision of independent living services in Puerto Rico.

Although the SILC is located physically in VRA facilities, the VRA does not interfere with its daily operations. The SILC:

Determines its office hours;

Evaluates its staff;

Has a ?Manual of Administrative Practices? which regulates the use of funds and personnel management;

Prepares an annual budget and has its own regulation.

The State Plan for Independent Living addresses the requirements that no condition is imposed to the SILC that compromises its independence.

## 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 members of the SILC are and always have been appointed by the Governor of the Commonwealth of Puerto Rico, including ex-officio members and the representative of the VRA. The council members are appointed from among representatives of different groups of people with disabilities, representatives of organizations or the community at large, who are interested in improving the quality of life of disabled people.

To ensure that the selection and appointment of council members comply with the established rules, the following process is followed:

- a. The CILs, state agencies, community at large and other groups/entities are asked to submit candidates to fill up vacancies.
- b. The candidates must be preferably persons with disabilities who know about independent living services offered in Puerto Rico, who like teamwork, and have reasonable time to perform tasks as assigned. They must believe in the principles of equal access, consumers control, and in the integration of people with disabilities into all aspects of society.
- c. The resumes or curricula vitae of those persons interested are presented to the plenary session of the SILC.
- d. The plenary session of the SILC approves the recommendations that will be made to the governor.
- e. A meeting is coordinated, if necessary, with the Governors Appointment Office to clarify and exchange information.
- f. An orientation program is prepared and implemented for new council members.
- g. The Council Member Manual is kept up to date detailing the duties, responsibilities and desired values of council members. It also includes information about the history of the independent living movement, independent living philosophy and information about what is an independent living center and the services offered.

The president of the SILC is elected among its voting members.

#### 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 has a Manual of Administrative Practices where policies related to personnel management are described. Every hired person receives a copy of the Manual and copy of the job functions. The employee must certify that he/she has received copy of the Manual and the description of his/her functions. The SILC has policies in place on the following: equal employment opportunities, reasonable accommodations, drug-free environment, harassment, domestic violence, personnel selection, employment of relatives, personnel records, use of the Social Security number of employee, office hours, attendance record, holidays, Christmas bonus, regular vacations, sick leave, license to vaccinate own children, leave with pay for funeral purposes, jury duty license, authorization of working time to breastfeed, evaluation, dismissal, resignation, discipline and order. Staff is maintained using the resource plan of SILC.

The plenary session of SILC determines, together with the executive director, the staffing needs. The staff is evaluated annually. The secretary is evaluated by the executive director and the executive director is evaluated by the Executive Committee, which informs the plenary session of SILC the results of such evaluation. The evaluations take into consideration the following: quantity and quality of work done, attendance, ability to learn, reliability, cooperation and initiative, and creativity.

- 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.

When assisting the SILC in the performance of its duties, neither the Designated State Entity nor any other state agency or office will assign to the administrative staff or to the employees of the SILC duties that would create a conflict of interest (Article XIII, Section 3 of the SILC Regulation).

## 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 service providers subsidized with Part B funds are required, by means of a services contract with the VRA, to ensure that the direct service staff be specialists in the field of independent living. Also, new hired staff are provided with orientation and training using its procedure manuals and other resources available through other sources such as: ILNET, ILRU, NCIL, among others. The VRA reviews the records and practices during monitoring visits to determine compliance with this requirement. As part of the process, technical assistance needs are identified. When technical assistance is required, the VRA determines the best way to plan it, including the provision of training, if necessary. All service providers in accordance with the requirements of the Rehabilitation Act, as amended, provide training opportunities to staff internally or through workshops and conferences in the community, among other means.

- 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.

Both service providers subsidized with Part B funds contracted by the VRA, and CILs have the equipment for the preparation of materials in alternate formats of communication, and staff who can communicate in alternate modes of communication: interpreters, assistants and readers on request; as well as staff who can communicate in the native language of the consumer. Each service provider maintains an updated list of interpreters and voluntary staff who can assist when necessary.

It is verified, during the monitoring visits, that staff is available to communicate in the specific way as described or that the service providers have agreements where these services can be requested, if necessary.

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

The service providers subsidized with Part B funds contracted by the VRA and the CILs develop and execute an annual training plan to provide opportunities to staff which includes how to attend teleconferences via ILNET, private seminars and courses for professional certifications, among others.

The VRA, during the monitoring visits, verifies that each contracted provider has a staff development program for all service positions required for the provision of independent living services and, when appropriate, in the administration of the program of centers. The objective of the program is to improve the skills of staff directly responsible for the provision of independent living services; including the knowledge and practices of the independent living philosophy.

- 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.

Both service providers subsidized with Part B funds contracted by the VRA and the CILs establish affirmative action practices to employ and advance in employment qualified individuals with significant disabilities, under the same conditions and terms as those individuals with disabilities under Section 503 of the Rehabilitation Act, as amended. The VRA also verifies compliance of this as part of the monitoring visits. Most of the employees of the CILs are individuals with disabilities in compliance with applicable Federal standards and requirements.

#### 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.

Service providers are required, by service contract, to have copies of the independent annual audits. In addition, the VRA audits at least once a year, all contracted organizations including the SILC to ensure proper disbursement of funds allocated and assess that the fiscal controls and procedures used are in compliance with applicable Federal regulations.

The CILs funded with Part C funds comply with the fiscal regulations of the Administration for Community Living (ACL) and with circulars of the OMB Uniform Guidance (2014).

Also, the SILC maintains a Manual of Administrative Practices which describes the procedures for the use of funds allocated.

#### 6.3 Recordkeeping, Access and Reporting

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

Service providers are required, by service contract, to maintain records and quarterly financial reports, and to submit monthly invoices; as well as to have written procedures that demonstrate the use of funds received. During the monitoring visits, the VRA verifies that the maintenance of records system complies with the required documentation.

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

The VRA reviews the required and requested reports to ensure that they are submitted as appropriate.

- Access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

The VRA verifies that the service providers are aware and comply with the requirement of providing access to the Administrator for Community Living or his/her authorized representative designated for these purposes. All fiscal and programmatic records are kept in safe places to ensure that independent auditors, the fiscal agent of the VRA and any federal representative can review these at any time.

The CILs are required to comply with the regulations for the maintenance of records, access and reporting established by the ACL and contained in the policies and procedures of the CILs.

#### 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 service providers are required to maintain written policies on the procedures used to determine eligibility. Compliance is verified as part of the annual monitoring visits for those subsidized with Part C funds with findings and recommendations on any corrective action required.

- 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.

The service providers offer information, as requested by the consumers, on the availability of other services in the community. Likewise, these providers can refer consumers, as requested, to other services and provide follow-up by phone to verify results.

Monthly reports on the information and referral services are submitted as part of the contract awarded. Compliance is verified as part of the annual monitoring visits with findings and recommendations on any corrective action required.

- 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 service providers are required, by service contract, to maintain written evidence on eligibility or non-eligibility of the persons requesting services. Compliance is verified as part of the annual monitoring visits with findings and recommendations on any corrective action required.

- 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 service providers are required, by service contract, to maintain a non-discrimination policy without regard to age, color, creed, gender, national origin, race or type of disability. Compliance is verified as part of the annual monitoring visits with findings and recommendations on any corrective action required.

- 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.

The service providers are required, by service contract, to maintain a state policy where the eligibility determination for foreign people applying for independent living services is not based on another condition other than being present on the Island. Compliance is verified as part of the annual monitoring visits with findings and recommendations on any corrective action required.

The CILs under Part C use the ineligibility criterion as established in the Rehabilitation Act, as amended.

#### 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 service providers are required, by service contract, to maintain consumer records containing documentation which evidences the development of an independent living plan designed between the applicant and a staff member of the service provider, unless there is a waiver signed by the applicant stating that the plan is not necessary. Compliance is verified as part of the annual monitoring visits with findings and recommendations on any corrective action required.

When an individualized Independent Living (IL) plan is completed, each consumer identifies the goals that he/she wants to achieve. The plans are reviewed periodically in order to be updated when necessary.

All consumers served by the CILs under Part C are required to develop an IL plan or sign a waiver stating their right not to develop such plan.

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

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

The service providers under contract, as well as the CILs, are required to maintain in the service records, written evidence that the consumers have received information on the Client Assistance Program (CAP) of the Office of the Ombudsman for Persons with Disabilities. The information provided includes the purposes of the CAP and how to contact and receive assistance from such program. The information is provided in alternate formats of communication.

Likewise, there are staff available to communicate in alternate forms of communication: interpreters and readers as required. The brochure of the CAP is provided to each consumer, during the interview process, in the format required by the consumer. Compliance is verified as part of the annual monitoring visits with findings and recommendations on any corrective action required.

#### 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.

The service providers are required, by service contract, to maintain written evidence in each consumer record of documentation on the protection, use and release of personal information of such consumer, including policies related to the use of photographs and list of names. These policies include signed written consent to release or share information.

All consumer information is unique and as such there is no list of agencies to which information is provided routinely. All information provided to agencies is offered only after the consent to release information is signed by the consumer. Compliance is verified as part of the annual monitoring visits with findings and recommendations on any corrective action required.

The CILs under Part C comply with the confidentiality requirements established by ACL. No information related to consumers, including photos, is shared with other persons or entities without the signed authorization of consumers. The service records of consumers are kept in locked files.



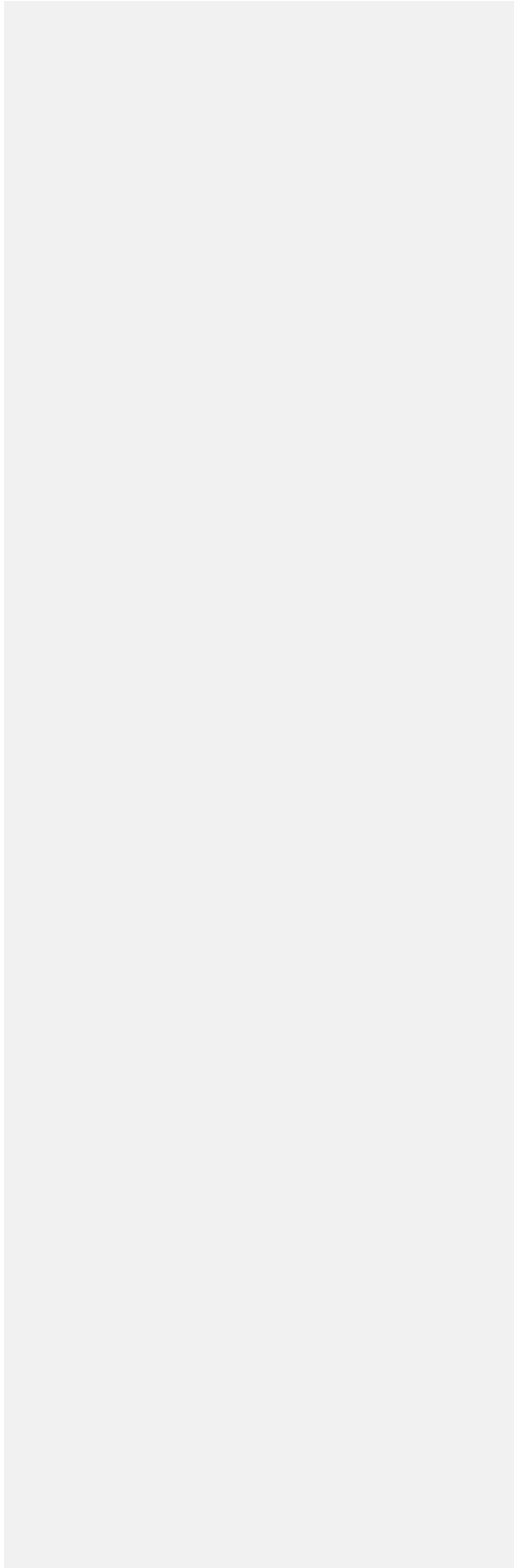
## Part II: Narrative: Section 7 - Evaluation

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
Mission 1 2 3	<p>The SILC will continuously monitor, review and evaluate the implementation of the State Plan for Independent Living (SPIL). The SPIL Plan Committee is responsible for the evaluation and monitoring activities. This is a permanent committee of the SILC as stipulated in Article XV of the SILC Regulation. The CILs are members of the Committee.</p> <p>Responsibilities of the SPIL Plan Committee:</p> <ol style="list-style-type: none"> <li>a. Will prepare an evaluation plan that includes the objectives of the Plan, compliance indicators and expected outcomes. The objectives will be evaluated in accordance with the compliance indicators established in Section 1.2A of the SILC Regulation.</li> <li>b. Will establish more precise time periods for achieving the objectives.</li> <li>c. Will meet every two (2) months to evaluate the progress of the Plan.</li> <li>d. Will present to the Plenary Session of the SILC a progress report twice a year that will include the following:               <ol style="list-style-type: none"> <li>1. Review of goals, objectives and activities included in the SPIL.</li> <li>2. Identification of barriers for the achievements of such goals, objectives and activities.</li> <li>3. Recommendations of amendments to the SPIL if necessary.</li> </ol> </li> </ol> <p>As part of the monitoring, review and evaluation process, the centers and the VRA have agreed to submit quarterly reports to the Committee which include, among others, the following: total number of consumers served, services provided and outreach activities carried out. Likewise, the VRA, through its representative on the SILC, will send a summary of the findings of the</p>

	<p>monitoring interventions carried out to the organizations and centers under contract with Part B funds.</p> <p>The centers, the SILC and the VRA also will meet quarterly to discuss the following: progress made in meeting the objectives of the SPIL, difficulties or barriers to provide services to unserved or underserved populations, innovative strategies to obtain the support of public/private entities, and to identify needs and satisfaction of the consumer with the services provided.</p> <p>The Committee also evaluates the RSA-704 Reports submitted annually by the centers.</p> <p>To evaluate whether the Plan identifies and addresses the needs of the population with disabilities, various activities are carried out as detailed in the objectives 1.d, 1.f, 2.d, 2.c, 3.a and 3.b under Section 1.2A.</p>
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## **Part II: Narrative: Section 8 - State-Imposed Requirements**

### 8 State-Imposed Requirements

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

No requirement has been imposed by the Government of Puerto Rico in excess of the required to comply with the established regulations.