State Plan for Independent Living (SPIL) for Rhode Island for 2017-2019

General Information

Designated Agency Identification

State: Rhode Island

Agency: Rhode Island Office of Rehabilitation Services

Plan for: 2017-2019

Submitted in fiscal year: 2016

View grant 90IS0036-01 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.

Rhode Island Governor's Commission on Disabilities

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.

Rhode Island Statewide Independent Living Council

- 1.4 The DSU and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the SPIL. Yes
- 1.5 The DSU, and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, may legally carry out each provision of the plan and will comply with all applicable Federal statutes and regulations in effect with respect to the three-year period it receives funding under the SPIL. Yes
- 1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law. Yes
- 1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is Bob Cooper, Executive Secretary.

Section 2: SPIL Development

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

• Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities.

Yes

- 2.2 The DSU and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan. Yes
- 2.3 The DSU and SILC establish and maintain a written description of procedures for conducting public meetings in accordance with the following requirements. The DSU and SILC shall provide:
 - appropriate and sufficient notice of the public meetings;
 - reasonable accommodation to individuals with disabilities who rely on alternative modes
 of communication in the conduct of the public meetings, including providing sign
 language interpreters and audio-loops; and
 - public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication.

Yes

- 2.4 At the public meetings to develop the State plan, the DSU and SILC identify those provisions in the SPIL that are State-imposed requirements beyond what would be required to comply with the regulations in 34 CFR parts 364, 365, 366, and 367. Yes
- 2.5 The DSU will seek to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under a project funded under chapter 2 of title VII of the Act and that the DSU determines to be effective. Yes
- 2.6 The DSU and SILC actively consult, as appropriate, in the development of the State plan with the director of the Client Assistance Program (CAP) authorized under section 112 of the Act.Yes

Section 3: Independent Living Services

- 3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other fundsYes
- 3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary. Yes

- 3.3 All service providers will use formats that are accessible to notify individuals seeking or receiving IL services under chapter 1 of title VII about:
 - the availability of the CAP authorized by section 112 of the Act;
 - the purposes of the services provided under the CAP; and
 - how to contact the CAP.

Yes

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

Section 4: Eligibility

- 4.1 Any individual with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and CIL programs authorized under chapter 1 of title VII of the Act. Any individual may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate. The determination of an individual's eligibility for IL services under the SILS and CIL programs meets the requirements of 34 CFR 364.51.Yes
- 4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services. Yes
- 4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services. Yes

Section 5: Staffing Requirements

- 5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. Yes
- 5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:
 - with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication, nonverbal communication devices, Braille or audio tapes, and who apply for or receive IL services under title VII of the Act; and
 - in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act.

Yes

- 5.3 Service providers establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development programs emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy. Yes
- 5.4 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will take affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act. Yes

Section 6: Fiscal Control and Fund Accounting

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

Section 7: Recordkeeping, Access and Reporting

- 7.1 In addition to complying with applicable EDGAR recordkeeping requirements, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain records that fully disclose and document:
 - the amount and disposition by the recipient of that financial assistance;
 - The total cost of the project or undertaking in connection with which the financial assistance is given or used;
 - the amount of that portion of the cost of the project or undertaking supplied by other sources:
 - compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
 - other information that the Commissioner determines to be appropriate to facilitate an effective audit.

Yes

- 7.2 With respect to the records that are required by 34 CFR 364.35, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate. Yes
- 7.3 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will provide access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, to the records listed in 34 CFR 364.37 for the purpose of conducting audits, examinations, and compliance reviews. Yes

Section 8: Protection, Use and Release of Personal Information

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

Section 9: Signatures

As the authorized signatories, we will sign, date and retain in the files of the state agency(ies) and the Statewide Independent Living Council the Part I: Assurances, 1-8, and the separate Certification of Lobbying forms ED-80-0013 (available in 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

NameJohn K Ringland

TitleChairperson

Signed?Yes

Date signed06/27/2016

Section 9: Signature for DSU Director

NameBob Cooper

TitleExecutive Secretary

Signed?Yes

Date signed06/27/2016

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:

Rhode Island is a state where all citizens have an understanding and knowledge of the Independent living philosophy and services, where all people with disabilities have the choice to live in the least-restrictive environment and have full access to all services needed to achieve equal inclusion in the community.

Goal Name: Goal 1

Goal Description:

Rhode Islanders have an understanding and knowledge of the Independent Living philosophy and services.

Goal Name: Goal 2

Goal Description:

All Rhode Islanders with disabilities have equal access and inclusion into public services in an accessible community.

Goal Name:Goal 3

Goal Description:

All Rhode Islanders with disabilities are fully informed and empowered to live in the least restrictive environment based on consumer choice.

Goal Name:Goal 4

Goal Description:

Goal Name:Goal 5
Goal Description:
The SILC will sustain efficient and effective operations.
Goal Name:
Goal Description:
Goal Name:

The Independent Living Network expands in Rhode Island.

1.2 Objectives

Goal Description:

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
Mission Goal 1	Objective 1: Rhode Islanders with disabilities are educated on IL services and where to go to receive services. Activities: 1.Participate or partner with at least ten consumer focused organization, regarding conferences, and educational opportunities. Responsible: OSCIL and SILC Time frame: 2017-2019 2.Co-host an annual regional educational event. Responsible: OSCIL and SILC Time frame: 2017, 2019 3.Continue enhancement of OSCIL and SILC websites increasing number of views by 10%.	10/01/2016	09/30/2019

	Responsible: OSCIL and SILC		
	Time frame: 2017-2019		
Mission Goal 1	Objective 2: Government officials and policy makers are educated on areas that impact Rhode Islanders with disabilities.	10/01/2016	09/30/2019
	Activities:		
	1.Partner with the Governor?s Commission on Disabilities (GCD) Legislative Committee regarding issues impacting persons with disabilities.		
	Responsible: OSCIL and SILC		
	Time frame: 2017-2019		
	2.Co-host GCD Public Forum event and participate on other forum panels.		
	Responsible: OSCIL and SILC		
	Time frame: 2017-2019		
Mission	Objective 3: Rhode Islanders are educated on the IL philosophy and the scope and extent of IL services.	10/01/2016	09/30/2019
Goal 1	Activities:		
	Provide IL informational resources at a minimum of ten public events.		
	Responsible: OSCIL and SILC		
	Time frame: 2017-2019		
	2. Maintain SILC and OSCIL?s websites to link to at least five other disability related organizations to provide more exposure for the IL philosophy and CIL services.		
	Responsible: OSCIL and SILC		
	Time frame: 2017-2019		
Mission	Objective 1: Rhode Islanders with disabilities have accessible and reliable transportation.	10/01/2016	09/30/2019
Goal 2			

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	Activities:		
	1. Continue to have monthly representation on the ATAC (Accessible Transportation Advisory Committee to RIPTA).		
	Responsible: OSCIL		
	Time frame: 2017-2019		
	2. Monitor the enhancement of access technology on RIPTA buses i.e. installation of cameras, automated stop announcements.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
	3. Advocate for legislation to enhance and support accessible and reliable public transportation for Rhode Islanders with disabilities.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
	4. Advocate for increased safety measures at central transportation hubs (i.e Kennedy Plaza, RIPTA terminals).		
	Responsible: OSCIL and SILC		
	Time frame: 2017-2019		
Mission	Objective 2: Recreational activities are accessible to Rhode Islanders with disabilities.	10/01/2016	09/30/2019
Goal 2	Activities:		
	1. Advocate for accessible recreational activities and facilities in the community, bringing information to the OSCIL.		
	Responsible: OSCIL and SILC		
	Time frame: 2017-2019		

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	2. Use media options i.e. websites and newsletters to inform consumers of location of accessible recreation options.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
	3. Promote Accessible RI as a resource to finding accessible recreational activities by helping to distribute at least 100 copies per year statewide.		
	Responsible: OSCIL and SILC		
	Time frame: 2017-2019		
Mission	Objective 3: Rhode Islanders with disabilities have access to all forms of communication without barriers.	10/01/2016	09/30/2019
Goal 2	Activities:		
	1. Model communication access at all meetings of the OSCIL, DSE and SILC.		
	Responsible: OSCIL, SILC, and DSE		
	Time frame: 2017-2019		
	2. Provide I & R to address community barriers to communication.		
	Responsible: OSCIL and DSE		
	Time frame: 2017-2019		
Mission Goal 2	Objective 4: Rhode Island will be a state where people with disabilities have access to the community without barriers.	10/01/2016	09/30/2019
	Activities:		
	1. Model access without barriers at OSCIL, DSE and SILC public events.		
	Responsible: OSCIL, SILC, and DSE		
	Time frame: 2017-2019		

	Educate consumers on how to self-advocate to address community barriers through instruction and training opportunities. Responsible: OSCIL Time frame: 2017-2019		
Mission Goal 3	Objective 1: All Rhode Islanders with disabilities will have access to the Community Living Options. Activities: 1. OSCIL will provide the Core Services: I & R, peer support, direct skills training, advocacy, and transitioning services. Responsible: OSCIL Time frame: 2017-2019 2. OSCIL will provide services to assist consumers transitioning from nursing homes or divert consumers from entering nursing homes by addressing barriers in consumers homes through facilitation and acquisition of home modifications, and assistive devices/technology and PCA services. OSCIL will realize a 20% increase in total served. Responsible: OSCIL Time frame: 2017-2019	10/01/2016	09/30/2019
Mission Goal 4	Objective 1: Expand OSCIL?s current services to accommodate program growth and to meet the growing needs of the community. Activities: 1. Address under served populations throughout growth of satellite to provide options for consumers seeking services in Northern Rhode Island. Responsible: OSCIL Time frame: 2017-2019	10/01/2016	09/30/2019

	2. Explore partnerships with other human service agencies to connect consumers to wrap around services.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
	3. Work with United Way 211 RV to promote OSCIL services state-wide, including outskirt areas of the state.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
Mission	Objective 2: Provide transition services.	10/01/2016	09/30/2019
Goal 4	Activities:		
	1. OSCIL will expand to include a High School outreach program to develop IL Skills and address barriers to living independently in the community.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
	2. OSCIL will partner with the YMCA to offer services to young adults with disabilities.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
Mission	Objective 3: OSCIL will have needed staff.	10/01/2016	09/30/2019
Goal 4	Activities:		
	1. Continue staffing for Part B programs- Nursing Home Diversion Services.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
	2. Continue staffing for the High School and YMCA youth transition services.		

	Responsible: OSCIL		
	Time frame: 2017-2019		
	3. Continue staffing for general IL service provision and purchase of home modification and equipment for those consumers found eligible.		
	Responsible: OSCIL		
	Time frame: 2017-2019		
Mission	Objective 1: Increase membership, communication, and collaborations of the SILC.	10/01/2016	09/30/2019
Goal 5	Activities:		
	1. Collaborate with other human service entities to increase SILC membership opportunities.		
	Responsible: SILC		
	Time frame:		
	A. Reestablish membership committee 2017-2018		
	B. Reach out to other organizations 2017-2019		
	2. Utilize a facilitator at regularly scheduled meetings.		
	Responsible: SILC		
	Time frame: 2017-2019		
Mission	Objective 2: SILC members will be well informed of their duties and responsibilities.	10/01/2016	09/30/2019
Goal 5	Activities:		
	1. Establish a SILC member training schedule.		
	Responsible: SILC		
	Time frame: 2017-2018		
	2. Provide opportunity for annual review of mission and focus.		

Responsible: SILC	
Time frame: 2017-2019	

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

With the closing of the other IL Center to the North, every effort is being made to outreach and continue services to individuals in that area, including establishment and expansion of a satellite in that area of the state. Outskirt areas, away from central larger cities of the state including Warwick, Cranston, Providence and Pawtucket, continue to be under-served due to lack of transportation access in those areas. OSCIL will partner with United Way?s 211 RV to bring independent living services to these outskirt areas of the state, as well as seek space within other agencies to provide access to IL services to outskirt areas.

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

Northern Rhode Island and state-wide, outskirt areas of the state away from larger cities and towns.

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

All IL services are of equal access to all Rhode Islanders having disability. Should a consumer request IL services and not have language access with their IL Coordinator or other Center staff, OSCIL works through the International Institute to acquire interpreters to facilitate communication access.

1.3 Financial Plan

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

1.3A Financial Plan Tables

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

Refer to the SPIL Instructions for additional information about completing the financial tables and narratives.

Year 1 - 2017Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	46684	273316		
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)				
Other Federal funds - other		307440		
Non-Federal funds - State funds		302560		
Non-Federal funds - Other				
Total	46684	883316	839761	0

Year 2 - 2018Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	46684	273316		
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)				

Other Federal funds - other		307440		
Non-Federal funds - State funds		302560		
Non-Federal funds - Other				
Total	46684	883316	839761	0

Year 3 - 2019Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	46684	273316		
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)				
Other Federal funds - other		307440		
Non-Federal funds - State funds		302560		
Non-Federal funds - Other				
Total	46684	883316	839761	0

1.3B Financial Plan Narratives

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

Part B funds will be administered by the DSE to the Center for implementation of the goals outlined - in particular for those activities serving those consumers needing home modifications, transition and assistive technology services. Part B funds will also be allocated annually to SILC resource activities and SILC related goals also detailed in this plan.

Part C serves to fund the Center's main operational needs.

Chapter 3 OIB funds are not referenced in 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.

In addition to Part B and C funds, the plan allocates Federal and State funds from Medicaid Waiver programs (CNOM) in Rhode Island- to expand the Home Modification Program and to supplement Personal Care Attendant costs for eligible consumers.

These funds are monitored by the RI Office of Rehabilitation Services by contract to the Center (OSCIL) on a State Fiscal Cycle pending budget approval = \$610,000.00

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 GCD who will serve as the DSE, is making available several in kind resources in support of the SILC resource plan- those resources include meeting and office space.

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 goals and objectives promote the philosophy of Independent Living based on consumer control, peer support, self help, self determination, equal access, and advocacy to maximize the leadership, independence and productivity of individuals with significant disabilities. They promote and maximize the integration and full inclusion of individuals with significant disabilities into the mainstream of American society.

The goals further the support of OSCIL and encourage improvement in working relations among the OSCIL, SILC, and community agencies serving people with significant disabilities.

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

The Executive Director of OSCIL (the only CIL in RI) is a member of the SILC and serves on the State Plan Committee.

Input from OSCIL has been an integral part of the development of the goals and objectives and assists them in meeting the standards and assurances and ensuring implementation of the design of a network of centers in Rhode Island. This input was an aggregate of the priorities of OSCIL,

based on customer satisfaction, known unmet needs and data provided by OSCIL regarding current trends and service requests from consumers.

OSCIL reports bimonthly at SILC meetings including the annual CIL 704 Report and Consumer Satisfaction Survey results.

The State Plan Committee reviews the reports in more depth prior to establishing the goals and objectives.

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.

SILC members are recruited from and/or are represented on many Councils/agencies that address the needs of people with disabilities. OSCIL also partners with many state and community agencies in order to provide and coordinate needed IL services. The State Plan includes activities to increase partnerships.

These partnerships could include: State Rehabilitation Council, Governor?s Advisory Council on the Blind and Vision Impaired, Commission for the Deaf and Hard of Hearing, Governor?s Council on Behavioral Health; RI Developmental Disabilities Council, Accessible Transportation Advisory Council, Veterans' Services Strategic Plan Advisory Committee; WIOA Joint Employment of Individuals with Disabilities Committee; United Way 211, Client Assistance Program (Disability Law Center), Division of Elderly Affairs, The MS Dream Center, Accessible RI, RI Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals; RI Department of Health, RI Department of Human Services; RI Office of Veterans' Affairs and the YMCA.

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.

OSCIL and the SILC review the plans of other agencies statewide providing services to individuals with disabilities and seek to provide IL services not otherwise provided as well as individual and system advocacy.

OIB services in RI are coordinated and provided directly by the Office of Rehabilitation Services. Though ORS will no longer serve as DSE for Rhode Island, OIB staff exercise due diligence concerning cross referral and utilization of funds, exchange of best practice models, and sharing of consumer satisfaction survey outcomes.

Coordination with multiple Social Security programs occurs on a case by case basis and through OSCIL participating on advisory committees. Frequent contact and coordination occurs in using Medicaid and Medicare services for access to assistive technology, health care and transportation.

The RI Department of Human Services administers Title XVIII Medicaid, including Medicaid waivers which are fully utilized in assisting individuals with significant disabilities to become more independent through access to personal care assistance, assistive technology and some other services.

The Department of Human Services also administers Title XX and OSCIL assist in accessing the services, such as transportation, provided through the agencies funded by Title XX.

The Office of Rehabilitation Services also has an Assistive Technology Partnership (ATAP) grant through which the OSCIL receives additional funding and participate as partners.

Veteran?s services are coordinated through contacts with the Rhode Island Office of Veterans' Affairs and the Regional Federal Veterans' Affairs Office.

Revise the 8th paragraph to read

Services to individuals with intellectual & developmental disabilities and behavioral healthcare services will be coordinated through the Department of Behavioral Healthcare, Developmental Disabilities, and Hospitals.

OSCIL provides on-going Information and Referral services as part of their everyday program activity. OSCIL employs a full-time I and R Specialist who responds to calls via phone, emails and walk-ins, including referrals from the Point 211. Information is provided to the community, other service providers, and OSCIL staff. This program is funded through Title VII: C funding and the Division of Elderly Affairs, as well as smaller grants.

Through OSCIL's Gift of Hearing Program, in collaboration with the URI Speech and Hearing Center, OSCIL provides low-cost hearing aids for those individuals who meet program eligibility.

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.

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	No	Yes
Core Independent Living Services - IL skills training	No	No	Yes
Core Independent Living Services - Peer counseling	No	No	Yes
Core Independent Living Services - Individual and systems advocacy	No	No	Yes
Counseling services, including psychological, psychotherapeutic, and related services	No	No	No
Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with significant disabilities)	No	No	Yes
Rehabilitation technology	No	No	Yes
Mobility training	No	No	No
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	No	No	Yes

Personal assistance services, including attendant care and the training of personnel providing such services	No	No	Yes
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	No	No	Yes
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act	No	No	Yes
Education and training necessary for living in the community and participating in community activities	No	No	Yes
Supported living	No	No	No
Transportation, including referral and assistance for such transportation	No	No	Yes
Physical rehabilitation	No	No	No
Therapeutic treatment	No	No	No
Provision of needed prostheses and other appliances and devices	No	No	No
Individual and group social and recreational services	No	No	Yes
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	No	No	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	No	Yes

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

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

The service provision priorities are as follows:

- 1. Increase access to the least restrictive environments, based on informed consumer choice. The CIL will assist consumers in transitioning from restrictive locations, such as nursing homes, into the least restrictive community based living. The CIL will also provide, if eligible and funding is available, home modifications and equipment purchases for consumers to achieve this.
- 2. Increase access to assistive technology through expansion of OSCILs expanded AT room. Expand OSCILs current services to accommodate program growth and to meet the growing needs of the community. Address underserved populations through expansion of OSCIL North satellite location to provide to options for consumers seeking services in northern Rhode Island. Through partnership with United Way 211 RV to promote OSCIL services statewide, including outskirt areas of the state. Center services will include direct skills training and information and referral, advocacy and peer support.

Due to limitations in funding:

- A. Part B funding will be used only when other funding is not available.
- B. Computers will not be provided except through donation programs.
- C. Economic needs will be considered.
- D. No prosthesis will be allowed.
- E. Only non-structural vehicle modification will be allowed
- 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.

The ability of individual consumers to pay is uniformly considered for the cost of home modifications, adaptive equipment and Gift of Hearing program. There are standard reporting forms for this information and such information is filed in the individual?s case record. The CIL has developed their own policy consistent with the policy of the Office of Rehabilitation Services policy for determining economic need.

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

The DSE will contract with the CIL for Part B SILS. IL service contracts with the CIL includes the provision of eligibility being determined by the CIL, with a sample of case records reviewed by the DSE. The DSE receives and reviews quarterly statistical, narrative, and financial reports.

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.

Rhode Island has one Center for Independent Living, Ocean State Center for Independent LIving (OSCIL), SPIL signatory, serving state-wide. OSCIL meets the federal standards, including cross-disability, consumer majority board of directors and qualified staff, consisting of a majority of individuals having disabilities. Staff are committed to the IL philosophy, and are valued for their skill and need to be paid fairly. OSCIL Center is located in Warwick, in Kent County and OSCIL?s satellite, OSCIL North, located in Pawtucket, in Providence County, both counties having the highest population in the state according to the 2010 census.

Rhode Island is a small state, comprised of a five counties, OSCIL serving all. Due to the state?s small size and geography (37 miles wide by 48 miles long), OSCIL and OSCIL North are able to offer services on a state-wide basis, providing direct services in consumer homes. OSCIL provides the following mandated core services: information and referral, advocacy, direct skills training and peer support, in addition to Nursing Home Transition and Youth transition.

A. The Development and implementation of the design for a statewide network of centers, with particular emphasis on:

(1) Underserved and unserved

Data collected from OSCIL Center indicates all cities and towns are being served. Approximately 75% of the individuals receiving IL services reside in the Warwick and Providence/Pawtucket areas.

Populations that are shown to be underserved or unserved by the center include those individuals living in outskirt areas. To address this need OSCIL has partnered with United Way?s 211 RV Van to bring IL services to these underserved areas.

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).

Priorities for establishment of new center.

The size of RI permits consumers to access the two OSCIL locations which are centrally located in Warwick and Pawtucket. Rhode Island?s land mass is roughly 1,776 square miles. OSCIL Center and OSCIL North are meeting the needs of Rhode Islanders having disabilities statewide. However, OSCIL has experienced an 83% increase in service provision and could be working at capacity in less than three years. An expansion of federal dollars for this state would be utilized to expand services at the existing OSCIL Center in Warwick and at the Pawtucket satellite, OSCIL North. This expansion of services would be a priority. Establishment of two additional satellites, one in Southern RI and one on Aquidneck Island would assist in addressing the IL needs for consumers living in those areas of the state. Funding required by the CIL to establish satellites in these two underserved areas is an additional \$740,000.

(3) Estimated resources needed to accomplish each step of the design.

The full funding required to completely serve the underserved would be \$740,000.00. To establish a satellite in Southern RI and another in Aquidneck Island would require a yearly budget to bring it into a comparable level of full-time operation.

The resources outlined above would be sufficient to have the two new satellites staffed by two full time IL direct service staff, one full-time support staff, two part-time IL Staff, one part-time receptionist, rent for accessible, highly visible space adequate to house staff and related activities; installation of phone service, internet, video phone for the Deaf, office machines/accommodations (Jaws, Dragon Dictate etc), advertise service availability; and receive adequate support staffing and supervision from the host CIL.

If further funding were secured, satellite programs will be established in Washington County and Aquidneck Island. Consumers in these areas are not accessing services as easily as those in the more central parts of the state due to lack of public transportation and affordable housing. For this reason, satellites would allow the existing CIL to provide IL services to geographic underserved areas of the state, without significantly increasing the administrative costs associated with the establishment of a full CIL.

(B) How the needs and resources were determined, the number of individuals with significant disabilities estimated to be unserved or underserved, and other data supported by surveys available in the state.

The SILC Survey conducted 2013-2015 was represented a small sample of the disability community. Of those surveyed 64% represented the central catchment areas of Providence and Kent Counties. OSCIL?s 704 reports over the last five years indicate that outskirt areas continue to be underserved by the Center. Outskirt areas of the state are underserved because our public transportation system primarily operates in Providence country and nearby areas. In addition, consumer satisfaction surveys identify present consumer unmet needs and are a foundation for planning.

Resources needed to bolster the existing CIL and the development of two new satellites was determined based on an analysis of current operating costs at the current CIL, consumer

satisfaction surveys, and SILC survey results. Additional information was gathered through other CILs relative to baseline funding requirements for operation of a CIL or Satellite.

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 DSE will administer the Independent Living Services (Part B SILS) programs via developing and monitoring contracts with the CIL, which is funded by Part B federal funds and by entering into a memorandum of agreement with the SILC, to provide all necessary support services to the SILC in accordance with its resource plan.

The DSE will provide the following in-kind services:

- 1. accessible meeting space for webinars, teleconferences or meetings on request of the SILC and/or the CIL;
- 2. office space for the SILC chairperson and/or administrative staff;
- 3. a business telephone line, with voicemail that can be accessed off-site;
- 4. email accounts that can be accessed off-site;
- 5. internet service and supports;
- 6. website maintenance; and
- 7. a computer workstation.

The DSE will utilize the state division of purchasing?s (bulk) master price agreements to purchase for the SILC and CIL, upon request the following:

- 1. Interpreters for the deaf & CART recorders;
- 2. Travel Services, booking hotel, airline tickets, etc. at the Government rate for council members attending conferences;
- 3. Information Technology Services, including cloud based daily automatic off-site backup of data files;
- 4. Directors & Officers Liability Insurance coverage;
- 5. Off-Site Shredding Services; and
- 6. mail processing at the state government?s pre-sort rates.

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

Rhode Island?s Designated State Unit (DSU), the Office of Rehabilitation Services, (ORS), in response to the transfer of State Independent Living Services Grant Programs from the RSA to the ACL and under those changes to the program allowing the State Independent Living Services Network to select a new DSE, opted to withdraw from the role of DSU at the conclusion of the FY 16 SPIL. The RI SILC discussed this change and options for a new DSE that had a mission and philosophy that closely aligned with the mission of the SILC and Center for Independent Living and identified the Governor?s Commission on Disabilities (GCD).

On April 6, 2016 the SILC voted to approach the Governor?s Commission on Disability (GCD) to be the new DSE. The SILC and Governor?s Commission on Disability met several time to discuss responsibilities, regulatory governance, establishing the GCD as the DSE in this state. The GCD voted on April 11, 2016 to accept this role.

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.

In conjunction with developing the SPIL, the Council and State Plan Committee also undertook the task of selecting a DSE. We met with our selection, the Governor?s Commission on Disabilities (GCD), and discussed our various roles and what is expected of each other. The Council feels they have made an excellent choice and will be complementary in our respective roles going forward.

The Rhode Island State Independent Living Council?s (RISILC) State Plan Committee prepared a draft budget. This step was necessary because our Treasurer, and head of the Finance Committee, was on leave. Therefore, the Chairperson reached out to available sources to review past budgets and expenditures to develop a starting point for the State Plan Committee to prepare a draft budget. Special attention was given to the goals of this SPIL to ensure appropriate resources to carry out the Plan. Its recommendation was sent to the full Council where it was reviewed and discussed. The RISILC Chairperson and State Plan Committee met with the DSE, Governor?s Commission on Disabilities (GCD), several times to review the resource funding source(s) and draft budget. The final budget was presented and approved by the RISILC, the Ocean State Center for Independent Living (CIL representative) and the DSE at the June 22, 2016 bi-monthly Council meeting.

The RISILC utilized the following guidelines in preparing the resource plan:

- ? Maximizing the use of other resources, including cost savings through utilization of the Master Price Agreement.
- ? Council members scheduling their own transportation.
- ? Committee Chairpersons assume the responsibility for scheduling meetings and contacting members, maintaining a committee file to include committee meeting agendas, minutes and reports.

- ? The RISILC will assure that accessibility needs are met for all members, volunteers, and the general public.
- ? The Governor?s Commission on Disabilities provides administrative support to the Council to fulfill its federal mandates.
- ? The GCD providing office space to assist the Council in conducting business, holding committee meetings, housing files and equipment rent free.
- ? Travel costs represent reimbursement for mileage for members to attend Council meetings, hearings, and forums to gather the needs of people with disabilities and follows the guidelines in Section 705 (f) of the Rehabilitation Act.
- ? The RISILC receives its Resource Plan funds directly from the DSE in the amount of \$46,684 each year of the three years of this SPIL.
- 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 RISILC?s resource plan requirements as listed above are met by the following relevant written procedures and policies, which are on file with the RISILC and the DSE and available for review: Financial Procedures, Business Procedures, and Internal Procedures. These procedures will be reviewed annually.

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

The RI General Assembly enacted and the Governor on June 24, 2016 signed into law the following statute, effective October 1, 2016:

RIGL 42-51-12 Governor's Commission on Disabilities - 42-51-12. Designated state entity. -- (a) The governor's commission on disabilities shall be the designated state entity (DSE), pursuant to section 705(e) of the Workforce Innovation and Opportunity Act (29 U.S.C. 796c). As the DSE, the commission shall apply for and:

- (1) Receive, account for, and disburse funds received by the state under Part B based on the state independent living plan (SILP);
- (2) Provide administrative support services for a program under Part B;
- (3) Keep such records and afford such access to such records as the administrator finds to be necessary with respect to the programs;

- (4) Submit such additional information or provide such assurances as the administrator may require with respect to the programs; and
- (5) Retain not more than five percent (5%) of the funds received by the state for any fiscal year under Part B, for the performance of the services outlined in paragraphs (a)(1) through 4) of this section. For purposes of these regulations, the five percent (5%) cap on funds for administrative expenses applies only to the Part B funds allocated to the state and to the state's required ten percent (10%) Part B match. It does not apply to other program income funds, including, but not limited to, payments provided to the state from the social security administration for assisting social security beneficiaries and recipients to achieve employment outcomes, any other federal funds, or to other funds allocated by the state for IL purposes.
- (b) The DSE shall carry out its other responsibilities under the act, including, but not limited to, arranging for the delivery of IL services under Part B of the act, and for the necessary and sufficient resources needed by the statewide independent living council (SILC) to fulfill its statutory duties and authorities, as authorized in the approved state plan.
- (c) Fiscal and accounting requirements: The DSE shall adopt fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for federal funds provided to centers for independent living (CILs), SILCs, and/or other service providers under the independent living services (ILS) program. The DSE must comply with all applicable federal and state laws and regulations, including those in 45 CFR parts 75.
- (d) The SILC shall not be established as an entity within a state agency, including the DSE. The SILC shall be independent of and autonomous from the DSE and all other state agencies.
 - Reliance, to the maximum extent possible, on the use of resources in existence during the period of implementation of the State plan.

Collaboration is an ongoing priority since it maximizes efforts and limited resources. Based on conservative budget figures and developing the SPIL goals and objectives within our financial and administrative assistance means, the RISILC?s resource plan is consistent with the existing resources expected to be allocated during the course of the three year SPIL period.

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 is independent of all state agencies including the DSE (Governor's Commission on Disabilities, see RIGL 42-51-12(d) above) where the SILC's office is located. The SILC develops and administers its own budget and may hire, supervise and evaluate its own staff or enter into a memorandum of agreement with the DSE for staff support.

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.

All appointments to the SILC are made by the Governor of RI upon receipt of SILC's recommendations as vacancies occur. Applications, appointment documents, and other pertinent materials are filed with the SILC. The current appointments and terms are kept at both the SILC and the Governor?s Office and are filed on the RI Secretary of State's website. Periodic reviews are conducted by SILC to assess and monitor the term limits, upcoming vacancies, and the diversity of the 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.

In accordance with the Act and State Law, the Council is responsible to supervise and direct the work of any personnel working for the Council in this capacity, and any such persons employed in this capacity serve at the will of the Council performing those tasks deemed necessary within the scope of the SILC?s duties.

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

The DSE will enter into a memorandum of agreement with the SILC, to provide the following support services:

- 1. posting SILC meeting notices on the Secretary of State?s Open Meetings? website and email to SILC listsery;
- 2. recording the minutes at SILC meeting, prepare draft minutes & post within 14 days on the Secretary of State?s Open Meetings? website;
- 3. filing SILC minutes once adopted on the Secretary of State?s Open Meetings? website;
- 4. arranging for interpreters for the deaf, CART recorders and other accommodations for SILC meetings and events;
- 5. arranging logistics for SILC events;
- 6. answer dedicated SILC telephone line and provide information, referral or other assistance as determined by the SILC;

- 7. preparing and distributing mailings/emailings as directed by the SILC;
- 8. compiling financial information for quarterly/annual reports for SILC?s review and approval;
- 9. processing of invoices approved to by the SILC; and
- 10. other staffing assistance the SILC requests, that can be provided within the SILC?s 30% cap.

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.

OSCIL employs personnel, a majority of whom have disabilities, who are specialists in the development and provision of IL services and in the development and support of the Center

IL Coordinators provide the core IL service of advocacy, direct skills training, peer support, information and referral and nursing home and youth transition services; as well as specialize in housing, assistive technology and home modifications.

• 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.

OSCIL?s personnel include individuals who are able to communicate with (1) individuals with disabilities who rely on alternative modes of communication, such as sign language, video phone, nonverbal communication devices, Braille, or audio tape; and (2) to the extent necessary communication using interpreters, translators or the Language Line, in the native language of individuals with disabilities who express limited English proficiency and who apply for and receive IL services under Title VII of the Act. OSCIL is able to collaborate with State Services for the Blind for Braille.

• 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.

OSCIL encourages and supports staff development. Staff are encouraged to attend workshops, conferences, or seminars to enhance skill level and proficiency. Staff participate in various ILRU trainings which provide the latest information on topics that will enhance service provision. Finance staff participate in trainings on the most current policies related to billing and fiscal management.

OSCIL employs 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

• 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.

OSCIL employs 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.

OSCIL maintains compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances; and the federal requirements for personnel administration, personnel development, affirmative action and nondiscrimination. In addition, OSCIL employees qualified persons with disabilities able to provide direct services that will assist persons having disability to address barriers to living independently in home and community.

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.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements, OSCIL submits monthly financial reports to the DSE.

* Financial Administration (Sec. 704(M)(3) of the Act; 34 CFR 364.35)

OSCIL and SILC are required to prepare budgets and are required to submit monthly financial and programmatic reports to the DSE documenting use of funds.

OSCIL follows US generally accepted accounting principles and uses the accrual basis of accounting. OSCIL management is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements in accordance with OMB Circular A-133.

The general approach of OSCIL in allocating costs to particular grants and contracts is as follows:

A. All allowable direct costs are charged directly to cost objectives, grants, activities, etc.

- B. If an allowable direct cost benefits more than one cost objective it is assigned directly to the cost center that benefit based on the level of benefit each cost objective receives.
- C. All other allowable general and administrative costs (costs that benefit all cost objectives and cannot be identified to a specific cost objective) are pooled and allocated to cost objectives, grants, etc. based on the ratio of direct costs for each cost objective or activity to total direct costs.
- 6.3 Recordkeeping, Access and Reporting
 - Maintenance of records that fully disclose and document the information listed in 34 CFR 364.35.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances. The DSE conducts periodic record review of OSCIL to assure compliance with these requirements.

- * Financial Record keeping (Sec. 704(M)(4)(A) and B of the Act; 34 CFR364.35)
- * Financial Reports (Sec. 704 (M)(4)(D); 34 CFR 364.36)
- **Includes monthly financial reporting to the DSE.
 - Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate

OSCIL is required to submit monthly and annual performance and financial reports. The DSE conducts periodic record review of OSCIL to assure compliance with these requirements.

- * Financial Reports (Sec. 704 (M)(4)(D); 34 CFR 364.36)
- **As required by Uniform Grant Guidance (UGG), OSCIL will provide monthly financial and programmatic reports to the DSE for review.
 - 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.

OSCIL is required to provide access to the Commissioner for the purpose of conducting audits, examinations and compliance reviews. The DSE conducts periodic record review of OSCIL to assure compliance with these requirements.

- * Access to Financial Records (Secs. 704.(M)(4) and (5) 34 CFR 364.37)
- 6.4 Eligibility

• Eligibility of any individual with a significant disability, as defined in 34 CFR 364.4(b), for IL services under the SILS and CIL programs.

All individuals provided IL services under Part B and CIL Part C shall be individuals with significant disabilities, as defined in 34 CFR 364.4b, be motivated to actively participate in the independent living program, and have expectation that services provided will benefit the individual. Financial need, congruent with ORS requirements, are required for individuals receiving home modifications and adaptive equipment paid for by grant funding.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements: Eligibility for Receipt of Services (Secs. 7(21)(B) and 703 of the Act; 34 CFR 364.51)

 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.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements re: Eligibility for Receipt of Services (Secs. 7(21)(B) and 703 of the Act; 34 CFR 364.51).

This does not however restrict the ability of any individual to seek information about independent living services under these programs and request referral to other services and programs for individuals with significant disabilities.

• Determination of an individual's eligibility for IL services under the SILS and CIL programs in a manner that meets the requirements of 34 CFR 364.51.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements: * Eligibility for Receipt of Services (Secs. 7(21)(B) and 703 of the Act; 34 CFR 364.51). All individuals provided IL services under Part B and CIL Part C shall be individuals with significant disabilities, as defined in 34 CFR 364.4b, be motivated to actively participate in the independent living program, and have expectation that services provided will benefit the individual. Financial need, congruent with ORS requirements, are required for individuals receiving home modifications and adaptive equipment paid for by grant funding.

 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.

Consumers are eligible for service based on disability and motivation to participate in program without regard to race, age, color, creed, gender, sexual orientation, gender identification, religion, national origin or type of significant disability of the individual applying for IL services.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements: Eligibility for Receipt of Services (Secs. 7(21)(B) and 703 of the Act; 34 CFR 364.51)

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.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements: * Eligibility for Receipt of Services (Secs. 7(21)(B) and 703 of the Act; 34 CFR 364.51)

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.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements: Consumer Service Reports (Secs. 704(m)(B), 725 (8) of the Act; 34 CFR 364.53); Independent Living Plans (Sec. 704 (e) and 735 (14) of the Act; 34 CFR 364.52).

IL Plans, following determination of eligibility, are developed jointly and signed by the consumer and OSCIL. IL Plans specify goals, objectives, services, and duration. IL Plans must be provided to consumers in an accessible format and are reviewed by OSCIL staff via monthly program reports.

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.

Individuals seeking or receiving IL services under Chapter 1 of Title VII will be notified in accessible formats about the availability of the CAP program, the purposes of the services provided under the CAP, and how to contact the CAP.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements: Notice about the Client Assistance Program (Sec- 20 & 704(m)(1) of the Act; 34 CFR 64.30)

OSCIL application and intake procedures include provision of CAP information to clients- in RI-Client Assistance Program is provided via the referral to the RI Disability Law Center.

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.

OSCIL is required to maintain compliance with the contract requirements, including compliance with the Rehab Act?s Section 725 Standards and Assurances and the following federal requirements: 34 CFR 364.56

All service providers comply with the protection, use and release of all personal information, including photographs and lists of names in compliance with 34 CFR 364.56(a) and other federal and state laws only for purposes directly related with the provision of IL services and the administration of the program, including but not limited to the following: OSCIL policies on confidentiality are strictly followed, including having staff and volunteers sign confidentiality statements, absolutely no sharing of mailing lists, consumers and their legal representatives are all notified of confidentiality policy and procedures; service providers obtain releases explaining purpose when information needs to be gathered and explain any exceptions to use of release; information is provided in understandable alternative formats as needed. No consumer information is shared without express written consent and prior approval from the consumer. All files and records are retained in locked cabinets to ensure security of information.

Part II: Narrative: Section 7 - Evaluation

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

Section 7: Evaluation

Goal(s) and the related Objective(s) from Section 1	Method that will be used to evaluate
Mission Goal 1	Objectives and activities will be evaluated by identification of measurable indicators, methods, sources and frequency of gathering information, and identification of responsible partners.
Goal 2	In addition, the following methods will be used in evaluating, reviewing and monitoring the implementation of the goals and objectives outlined in Section 1.
Goal 3 Goal 4	The SILC will carefully review OSCIL?s 704 Part II Reports and consumer satisfaction surveys.
Goal 5	2. OSCIL will report at all SILC bimonthly meetings on their work plan goals and objectives congruent with the State Plan for Independent Living (SPIL); i.e., regarding transition services, including youth and nursing home transition, nursing home diversion, the home modification and assistive technology programs, implementation of the YMCA Partnership, and under-served outreach efforts, including information on the number of consumers served.
	3. The SILC will use information gathered from focus groups and public forums.
	This evaluation methodology is meant to be as time efficient as possible, in order to maximize OSCIL's time providing IL services, advocacy, IL skills training and information and referral. This is especially important given limitation from all sources of funding in the present economic climate and the need for OSCIL to report to a variety of funding sources for grants.

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

8 State-Imposed Requirements

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

State purchasing requirements require competitive bidding practices so as to assure the greatest value per service and outcome. Therefore, Title VII Part B funded contracts allocating funds described in this plan require adherence competitive bidding in purchases. Home modifications and adaptive equipment have an economic need requirement which is periodically updated.