

Annual Report on Centers for Independent Living Program Year 2019

Funded under Part C of Title VII of the Rehabilitation Act, as amended

Submitted by

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November 30, 2020

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ACL is an operating division of the U.S. Department of Health and Human Services.

Note: At the time of the drafting and submitting of this report, the nation—and the world—continue to fight the COVID-19 pandemic. The 2021 and 2022 reports will reflect activities carried out by the Centers for Independent Living Program with funding appropriated by the CARES Act of 2020; these funds are being used to meet the urgent needs of individuals with disabilities, which include food and meal delivery, personal protective equipment, housing, and transportation.

Executive Summary

Each year more than 200,000 individuals with disabilities exercise their freedoms and rights, avoid institutionalization, and pursue their goals while living, working, and learning in their communities because of support offered through the Centers for Independent Living (CIL) program. The CIL program provides financial assistance to community-based organizations, in particular local CILs, in every U.S. state and territory. These funds provide, expand, and improve independent living services for people with disabilities in the United States.

Authorized by Title VII, Chapter I, Part C of the Rehabilitation Act of 1973, as amended (the Act), the CIL program maximizes the leadership, empowerment, independence, and productivity of individuals with disabilities and works to ensure the integration and full inclusion of individuals with disabilities into the mainstream of American society. Acknowledging the importance of successful employment outcomes for people with disabilities, the Workforce Innovation and Opportunity Act of 2014 (WIOA) added a new core service that ensures the CIL program focuses on the transition of youth to post-secondary life.

As part of administrative responsibilities for the CIL program, the Director of the Independent Living Administration (who also serves as Commissioner of the Administration on Disabilities) must provide the Administrator of the Administration for Community Living an annual report that includes:

- » The extent to which CILs that receive funds under Part C have complied with the standards and assurances in section 725 of the Act;
- » The identification of individual CILs in the analysis contained in that information; and
- » Results of on-site compliance reviews, including identification of individual CILs and other recipients of assistance under Part C.

The standards and assurances mentioned above establish the underpinnings of the program, such as consumer control, self-help and self-advocacy, and peer support. The standards and assurances also establish the CIL program oversight framework.

Program year (PY): the period when funds were expended. CIL program funds are forward funded. Funds used between September 30, 2018 and September 29, 2019 were appropriated in the previous fiscal year (FY2018).

This report covers the period of September 30, 2018 to September 29, 2019 (PY2019). Data are drawn from CIL annual program performance reports, federal program staff oversight and compliance review activities, and information publicly available on grantee websites.

Key services, activities, and achievements observed during PY2019 include:

- » The CIL program exceeds requirements for consumer control;
- » Consumers successfully accomplished 172,486 established goals; each individual goal increasing independence, integration, and full inclusion of CIL consumers in society;
- » Over one million services provided by CILs; and
- » CILs generated an additional \$616,826,096 (beyond ACL's CIL program funding) to expand services.

Consumer: *People with disabilities who receive services from CILs are often referred to as “consumers.” The term “consumer” is used to indicate that it is the individual receiving services who has control over the process and is the one making the final decisions.*

Goals and Services: *CILs work with each consumer to set independent living goals. Consumers often come to CILs looking for a specific service or services. CILs guide the discussion from the specific service(s) to what the consumer wants to accomplish by having that service. The consumer establishes a goal based on the discussion and the CIL and consumer determine the services that will help the consumer reach the goal(s).*

Throughout PY2019, CILs continued to build on their capabilities and capacities to provide services and supports to consumers who are preparing to or who have completed their secondary education or otherwise left school, to post-secondary life. During this transition period, typically between ages 16 to 24, it is critical to provide young adults with formal and informal supports that allow them to pursue competitive, integrated employment. The Workforce Innovation and Opportunity Act identifies the critical role that CILs should play in supporting youth during this transition; in PY2019 CILs reported a 27% increase in activities related to providing these services.

During PY2019 CILs substantially complied with required standards and assurances while significantly increasing the independence of people with disabilities. In FY2019, ACL fully implemented a new protocol that overhauled and improved compliance and performance oversight of the CIL program. This change resulted in more consistent and comprehensive oversight.

CIL Program Overview

The CIL program authorized under Title VII, Chapter I, Part C of the Rehabilitation Act, as amended, provides financial assistance to community-based organizations, specifically CILs, to provide, expand, and improve independent living services for individuals with disabilities in the United States.

What is a CIL? *“A consumer-controlled, community-based, cross-disability, nonresidential private nonprofit agency for individuals with significant disabilities (regardless of age or income) that is designed and operated within a local community by individuals with disabilities; and provides an array of independent living services, including, at a minimum, independent living core¹ services.” A founding principle of CILs is consumer control, which means that each CIL “vests power and authority in individuals with disabilities, in terms of the management, staffing, decision making, operation, and provisions of services, of the center.”*

In PY2019, a federal appropriation of \$90,805,000 supported 354 awards managed by 284 individual CILs (some CILs received more than one award). A CIL must minimally meet program and fiscal standards and assurances set forth in the Act² to receive continued funding. Each CIL must submit a Program Performance Report (PPR) to the ACL Administrator at the end of each fiscal year. The report contains data and information identifying the extent to which the CIL complied with the standards and assurances set forth in the Act. A CIL must complete a PPR for each CIL program grant it receives. The review of PPRs by federal staff and subsequent feedback to the CIL are critical components that ensure ongoing compliance of CILs.

Standards and Assurances

The standards and assurances found in the Act ensure that all CIL programs and activities are planned, conducted, administered, and evaluated in a manner consistent with the purpose established in the Act, with the objective of providing assistance effectively and efficiently³ to CIL consumers.

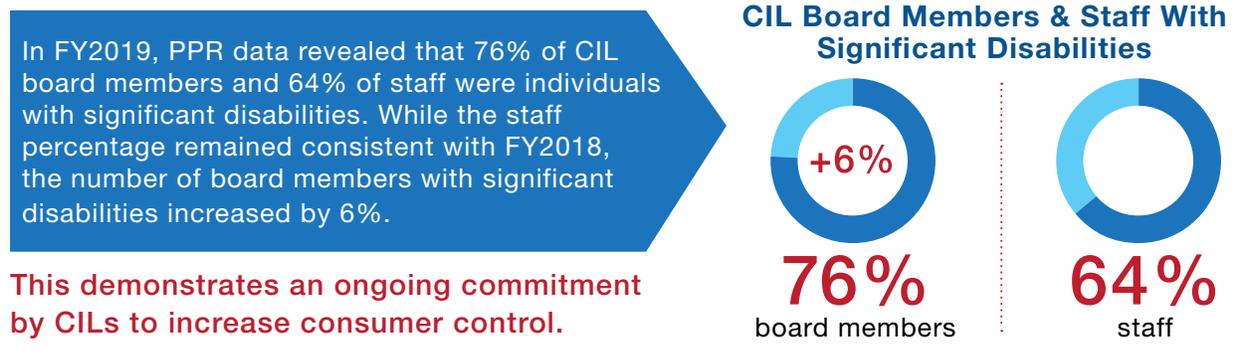
Purpose of Title VII, Chapter I of the Act

Promote a philosophy of independent living including a philosophy of consumer control, peer support, self-help, self-determination, equal access, and individual and system advocacy, in order to maximize the leadership, empowerment, independence, and productivity of individuals with disabilities, and the integration and full inclusion of individuals with disabilities into the mainstream of American society.⁴

Supporting Independent Living

CILs promote and practice the independent living philosophy of consumer control, self-help and self-advocacy, development of peer relationships and peer role models, and equal access within communities to all services, whether public or private. This philosophy holds that barriers to full inclusion are based on the environment, *not* the disability. The independent living philosophy focuses on recognizing that people with disabilities are experts on their own needs and what services they require.

Consumer control is a hallmark of the independent living philosophy and contributes to what makes the CIL program unique in local communities. People with disabilities are “consumers” when applying for or receiving services from a CIL, and are also the ones leading decision-making, service delivery, management, policies, and direction of the organization.



CILs promote self-help and self-advocacy by offering consumers training on how to advocate on their own behalf as well as opportunities to put that training into practice. Self-advocacy is an important way in which people with disabilities have a voice of their own.

CILs reported 22,705 self-advocacy goals successfully achieved in PY2019.

A self-advocacy goal represents an increase of independence in an identified area while simultaneously increasing the consumer's ability to address future issues. Two examples of areas addressed through self-advocacy goals are education on workplace accommodation rights and responsibilities and training on how to secure accessible, affordable housing.

CILs encourage staff with disabilities to serve as peer role models to consumers when delivering services or conducting program activities. Staff are often former consumers. Peer support recognizes that people whose disabilities are similar best understand each other's experiences, needs, and challenges. A peer mentor helps foster critical decision-making skills and serves as an example of what can be achieved when goals are established and met. This approach provides consumers with first-hand experience as they set and achieve their goals. CILs reported 41,353 instances of peer counseling services, which included leading or hosting groups that regularly meet to discuss disability-specific issues and trending topics in the community.

Equal access to community services and supports is critical to the integration and full inclusion of people with disabilities into the mainstream of American society. Examples of how CILs have played a key leadership role in this effort include (1) advocating for accessible communication technology such as videophones in professional offices, (2) providing fee-for-service ADA building accessibility reviews, and (3) participating in city council meetings to support a local "visitability" ordinance that requires all new single-family home construction to have at least one accessible entrance. These activities contribute to increased equal access in the communities where people with disabilities live, work, learn, and play.

The IL philosophy situates the CIL staff as leaders who provide services while always emphasizing the role of the consumer, who will grow in his or her capacity to address barriers. CILs also prepare consumers to engage as leaders.



Highlight: Atlantis Community, Inc. (Denver, CO)

A deaf consumer sought services at a CIL after frequent conflicts and complaints at work resulted in difficulties holding a job. A CIL staff member, a person who is deaf, helped the consumer explore the extent to which being deaf contributed to the work issues. The CIL staff member referred the consumer to an audiologist and the consumer subsequently acquired hearing aids. Through peer support, the CIL staff assisted the consumer in learning new approaches to engage with co-workers and methods to establish functional relationships with colleagues and supervisors. With the assistive technology, new communication skills, and a renewed confidence in himself, the consumer reports that he is happy with his progress and remained employed six months later.

Achieving Independent Living Goals

Independent living (IL) goals determine the services that are provided to a consumer. IL goals address the underlying barrier(s) to independence. Commonly set goals include securing accessible housing; learning to use public transportation; obtaining competitive, integrated employment; and living independently in the community. Services are identified and facilitated by the CIL and include activities undertaken by a consumer to reach a goal. Consumers might identify one goal that is easily achieved in a few months or multiple goals that build on achievements and include services and activities over a course of several years. In PY2019, consumers successfully accomplished 172,486 IL goals, with each goal increasing independence, integration, and full inclusion in society.

CILs reported three categories where consumers achieved more than 50% of their goals:



personal resource management



self-advocacy



transportation

Personal resource management goals typically include personal banking and budgeting. This goal is particularly critical for individuals transitioning from an institution where they likely did not manage their own finances. Many CILs teach classes on personal finances and/or provide one-on-one coaching to help consumers gain the knowledge and confidence to manage their own personal income and expenses. For consumers who may need additional support to remain independent, CILs may connect them to resources to help them manage their finances.

It is important that individuals with disabilities be able to self-advocate so that they make decisions based on their personal goals, preferences, and needs. For some, self-advocacy may mean sharing their symptoms with their doctors, discussing reasonable accommodations at work, addressing transportation issues, or ensuring that they have equal access to local businesses and government buildings.



Highlight: Self-Advocacy

One CIL reported that a blind consumer was very frustrated about a dangerous intersection. Using self-advocacy skills acquired through CIL training, the individual was able to contact the local planning department and advocated for audible traffic signals at the intersection. Audible traffic signals were eventually installed, increasing independence for this individual and anyone else using that intersection who is blind or visually impaired.

Many consumers identify transportation-related goals when seeking support and services from their local CIL. Consumers regularly identifying a need to improve their access to and comfort with navigating local transportation systems. In 2019, one notable instance involved teaching a youth, who could not read, how to use the local transit system. The youth's CIL contacted the local transit authority and arranged for individualized training so that graphic signage could be used for successful and independent navigation. A CIL staff member trained and shadowed the individual, not giving cues about whether they had reached the right bus stop to get off or if they had gone past their stop. This young consumer is now independently using the transit system to go shopping and explore his community. The training was the first bus route the consumer learned on his journey to expand his independence. It is the hope of the program that, through gained confidence, this young man will continue to expand his independence.

Employment goals play a key role in the independence of people with disabilities. Having a career and earning a paycheck remains the surest path to economic freedom and mobility. While CILs have a statutory requirement to support youth who are transitioning to adulthood, thousands of consumers use services that support job-related goals throughout adulthood. To support adults looking to enter the workforce, CILs continue to deliver training and support. Below are three examples of how CILs support employment-related goals.

- » **Center for Independent Living in Central Florida** (Winter Park, FL) designed the Step Ahead program. Step Ahead offers participants guidance and marketable skills through career exploration, job readiness training, employment shadowing, resume building, work-based internships, and support in achieving their self-determined goals. Participants in Step Ahead programs receive direct one-on-one instruction as well as advocacy training, internship, and employment placement. Through their involvement with Project SEARCH, 100% of the students who completed Project SEARCH in the 2017-2018 school year gained employment. In recognition of their accomplishments, the 13th Project SEARCH Annual Conference in 2019 honored the Central Florida CIL with an award for their high employment placement outcomes during the 2017-2018 school year.
- » **Alpha One** (South Portland, ME) Pre-Employment Transition Services (Pre-ETS) program and AgrAbility are partnering to mentor high school students who live in rural areas and are interested in farming and agriculture as a career. A peer mentor, with a background in farm work, worked within this partnership to deliver small group lessons and curriculum at several high schools. Pre-ETS and AgrAbility produced a documentary which followed three students from Massabesic High School throughout their summer work experience on Rummier Run Farm. This program creates an opportunity for rural youth to explore careers within their local community.
- » **The Freedom Center** (Frederick, MD) found that many people with disabilities needed training to prepare for and achieve a successful transition into the workforce. Addressing this service gap, the Freedom Center launched the Workforce Opportunities and Recruitment Club (WORC) program. WORC is a volunteer program that aids job seekers during the transition to the work environment after receiving Social Security benefits. Consumers who access this program can volunteer to work in The Freedom Center's office doing a variety of activities that train them to work on a schedule, learn time management, work with others in an office, learn new skills, and engage in appropriate behavior in the work environment. The objectives include helping the consumer's transition to a work setting, increasing their sustainability after job placement, and eventually eliminating their reliance on benefits. In PY2019, three individuals entered the WORC program, and two of them began careers in their community.

Delivering Independent Living Services

CILs reported providing 1,069,091 services in PY2019. Services include core services and other independent living services⁵ identified in the Act. Core services must be available at every CIL regardless of funding amount received or service area. Other IL services vary from CIL to CIL in response to community needs and complement or expand on required services. Services must focus on including and supporting the individual. This approach helps consumers grow their confidence and provides a skill set to self-advocate and seek out solutions to issues. For example, after learning self-advocacy skills (a core service) from a CIL, an individual may have the confidence to actively participate in their IEP meeting or tell the manager of a business that it is not accessible.

CILs reported providing 837,623 core service activities, including:



Information and referral services



Independent living skills training



Peer counseling



Individual and systems advocacy



Services that facilitate the transition from institutions to community living, diversion from institutions to community living, and transition of youth from secondary education to post-secondary life

Core Service Highlight

Successfully transitioning to independent adulthood

The transition of youth to post-secondary life has seen the most significant growth of any core service in recent years. The 27% increase in related services over the past three years reflects the efforts CILs have made to develop the transition core service as well as effective outreach by CILs to students and youth.

The transition from high school to college, vocational training, or work is challenging for every young person and presents exceptional challenges for individuals with disabilities. As they prepare for this transition, youth with disabilities struggle to find early and meaningful paid work opportunities, experience significant changes to their support systems, and often fail to make sufficient plans for their future. As a result, youth with disabilities are less likely to have jobs that pay competitive wages in integrated settings than youths who do not have disabilities.

Adults with disabilities in the United States continue to have significantly high rates of unemployment and underemployment. Consequently, adults with disabilities are more likely than their peers without disabilities to live in poverty, experience serious underlying health conditions, and suffer from mental health issues. These factors are part of the reason that people with disabilities continue to have lower life expectancies than the general population.

When youth with disabilities have the right supports to plan and execute their transition and independent living plans, work and earn real wages, and learn important skills, they are more likely to have successful transitions to adulthood. CILs across the United States play a critical role in helping youth with this transition.

CILs work with youth to identify and take action regarding their goals and plans. For example, youth may have a goal to live independently, away from their family, but struggle to manage necessary attendant care. An independent living transition plan may address that issue and also include helping the youth access and secure accessible, affordable housing, navigate public transportation, and plan a budget for expenses including utilities and food.

In response to these challenges, the Workforce Innovation and Opportunity Act of 2014 (WIOA) added a new core service designed to address the transition of youth:

“Facilitate the transition of youth who are individuals with significant disabilities, who were eligible for individualized education programs under section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)), and who have completed their secondary education or otherwise left school, to post-secondary life.”

The following represent specific programs provided by CILs to address the transition of youth core service:

- » **disABILITY LINK** (Tucker, GA) Transitioning into adulthood involves learning various skillsets. To address these needs, this CIL developed a comprehensive 22-lesson curriculum that is deployed throughout the year. Through interactive formal group sessions and peer support, participants receive training on advocacy, benefits, career options, independent living, and social skills. When students complete the curriculum, they are empowered to connect with others and become more confident in their decision-making abilities.
- » **IndependenceFirst** (Milwaukee, WI) Success in employment is a key aspect of successfully transitioning into adulthood for anyone. For a person with a disability, this transition often involves working with the Division of Vocational Rehabilitation. To assist in this effort, IndependenceFirst facilitates “Help Yourself,” a self-advocacy training program for youth working with the Wisconsin Department of Vocational Rehabilitation. During the training, youth learn effective communication, problem solving, and goal-setting skills. They also learn how to understand their rights and responsibilities. The growth of these skills during the training increased successful vocational outcomes.
- » **Center for Independent Living for Western Wisconsin** (Menomonie, WI) In 2019, transition-age youth established goals including acquiring employment, improving financial management, locating affordable housing, and gaining access to public transportation. To assist individuals with a successful transition from school to post-secondary life, 37 youths participated in classes facilitated by the CIL’s staff. Each youth’s approved curriculum focused on issues such as how to prepare a budget, advocacy, and empowerment. By focusing on each youth’s goals, this program encouraged students to become self-sufficient.

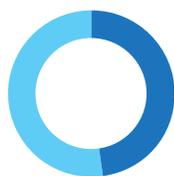
Ensuring Consumer Diversity

CILs must provide cross-disability services. Historically, more than half of all consumers receiving services in a given year have a physical disability. Approximately 15% of people served by CILs are individuals with intellectual and developmental disabilities.⁶

In 2019, the data demonstrated the diversity of individuals that were served. These data remained consistent with data reported in 2016, 2017, and 2018.



55%
female



48%
identifying as a
minority



43%
25–59
years old



39%
60 years
old or over

Section 21 of the Act contains a 1% CIL program funding set-aside requirement for conducting outreach to traditionally underserved populations. ACL identified the Native American population as underserved by the IL program and funded the Native American Independent Living Demonstration (NAILD) project in response to this requirement. This multiple-year demonstration project has funded five CILs to:

- » Gain an understanding of service needs of Native Americans with disabilities living in Indian Country;
- » Improve cultural competence with regard to the needs of specific tribal organizations identified by current CIL grantees; and
- » Capture lessons learned and best practices for outreach and service delivery to Native Americans with disabilities.

In 2019, the demonstration projects served 171 Native Americans with disabilities and provided 481 services which were designed to address 67 separate IL goals identified by consumers. A final report on outcomes achieved for the NAILD project will be developed by ACL in 2022, after the conclusion of the demonstration project in FY2021.

In addition to the NAILD project, the Section 21 set-aside supports the Disability and Rehabilitation Research Project (DRRP): Independent Living Transition Services for Youth and Young Adults with Significant Disabilities from Minority Backgrounds. The DRRP will conduct research to generate evidence-based practices for services provided by CILs to facilitate the transition to post-secondary life of youth with significant disabilities from racial and ethnic minority backgrounds who were eligible for individualized education programs and who have completed their secondary education or otherwise left school. This research project will (1) systematically identify promising practices for facilitating the transition of youth and young adults with significant disabilities from minority backgrounds, (2) develop at least two manualized transition interventions for youth and young adults with significant disabilities from minority backgrounds, and (3) assess the feasibility and efficacy of the transition interventions for youth and young adults with significant disabilities from minority backgrounds.

A final report on outcomes achieved by the DRRP will be developed by ACL in 2024, after the conclusion of the project in FY2023.

Growing IL Services through Resource Development

To support an expansion of services and long-term sustainability, the standards require CILs to obtain funding from sources other than funding received through ACL's CIL program.

Resource development activities are as varied as the communities in which CILs are located. Although CILs have no specific resource development threshold to achieve, additional funding contributes to the health and sustainability of an organization, and provides opportunities for additional consumer services and program activities that might not otherwise be possible.



In 2019, CILs reported
resource development activities
which generated
\$616,826,096.

This amount is more than
six times
the federal appropriation
and greatly supports
sustainability and
expansion of services.

Some states provide CILs with state general funds to supplement and expand independent living services and activities. Some CILs are vendors for independent living services or serve as pass-through entities for programs such as Money Follows the Person. Resource development also occurs through ACL funding opportunities that exist in addition to the CIL program funds.



Highlight: Veteran Directed Care (VDC) Program

ACL provides opportunities through the VDC program for veterans to self-direct their long-term service and supports (LTSS). The program identifies CILs as one of four providers authorized to deliver person-centered and consumer-directed services that help veterans at risk of institutionalization continue to live at home and engage in community life. Eligible veterans manage their own flexible budgets, decide what mix of goods and services best meet their needs, and hire and supervise their own workers. In April 2019, the VDC program served 2,166 veterans across 37 States, the District of Columbia, and Puerto Rico. Collaboration efforts across ACL will continue to focus on increasing the number of CILs actively working as VDC providers.

Other examples of resource development activities reported by CILs include:

- » **Access Living of Metropolitan Chicago** (Chicago, IL) reported in its PPR that it has a diversified resource development plan. Some of its targeted efforts include a comprehensive plan for soliciting foundations (which includes monthly prospecting meetings to identify new sources of foundation funding), from which they raised over \$1 million this year. They have a \$10 million major gifts campaign that has raised \$9.92 million to date. Their annual gala raised over \$730,000, with approximately two-thirds of this amount donated by corporations.
- » **Silicon Valley Independent Living Center** (San Jose, CA) reported over \$440,000 in local government funds in their PPR last year. Included in that total are Community Development Block Grants from the cities of Palo Alto, Sunnyvale, Santa Clara, Gilroy, Milpitas, Mountain View, and unincorporated areas. The block grants were used for housing workshops/services throughout the area in various senior and community centers. They also receive funding from the state through a two-year pilot program grant, Home Safe, to support housing stability for high-risk Adult Protective Services clients who are older adults with a disability.
- » **Corning Council for Assistance & Information to the Disabled** (Corning, NY) received a grant from the Empire State Supportive Housing Initiative to provide supportive housing services to 15 people who are homeless and have disabilities. The grant is for \$375,000 annually for 5 years and is renewable 5 times (30 years total).

CIL Program Oversight Activities

ACL's Compliance and Outcome Monitoring Protocol (COMP) is a robust tool that establishes an efficient, systematic, transparent, and consistent oversight process for CIL program activities. COMP includes ongoing reviews of key risk indicators for every CIL grantee, establishes distinct remote and on-site compliance review activities, and includes corrective action plans that directly address noncompliance and minimize risk to federal dollars.

COMP uses three interwoven processes that can occur in any order or simultaneously: standard monitoring, focused reviews, and comprehensive reviews.

1. **Standard Monitoring** is the ongoing annual review of each CIL grantee. Federal staff use a standardized approach to assess select program, operational, and fiscal management data. Monitoring includes, but is not limited to, the review of the program performance report, fiscal documents, and funds drawdown records. For example, program officers review the pace at which a CIL is drawing its grant funding. Drawing funds more quickly or more slowly than the norm would initiate additional follow-up. Although there are many legitimate reasons for either behavior, both can also be indicators of risk.
2. **Focused Reviews** involve reviewing specific areas of concern. This type of review is individualized based on the issue(s) with the program. A focused review may be completed remotely (also referred to as a desktop review), onsite, or both. For example, if there are complaints that the CIL facility isn't accessible, the review might begin with a request for additional information from the CIL. That information might be sufficient to address the issue—perhaps the front door was broken, but it has been fixed. In contrast, if the complainant stated that the CIL has fixed the door, but they still cannot navigate the site using a wheelchair, and the CIL insists there is a not a problem, a site visit may be needed to accurately assess the issue.
3. **Comprehensive Reviews** are full reviews of a CIL's operations and include a thorough examination of all the components ACL monitors. A team, led by an ACL program officer, conducts an onsite or remote review. The Comprehensive Review is an interactive process involving the review team and the CIL and may require additional document collection and review. On an annual basis, ACL conducts comprehensive reviews on a subset of CIL grantees. The process to select CIL grantees for a comprehensive review involves a combination of (1) risk factors identified by federal staff, (2) random selection, (3) federal staff recommendations, (4) geographic area considerations, and (5) requests from grantees.

One key goal of COMP is to identify developing issues early so that ACL program officers can work with grantees to address situations before they become significant. There is no set frequency as to when a CIL is selected for a focused or comprehensive compliance review. If concerns persist, grantees could receive more than one site visit and/or remote comprehensive review. COMP is designed not only to improve compliance but also to drive continuous improvement across the program so that more Americans with disabilities are receiving the support they need to live independently.

Remote Reviews

ACL launched COMP in June 2018 as a pilot with six CILs participating in remote reviews.

State	COMP Pilot CIL
MD	Accessible Resources for Independence, Inc.
SC	ABLE South Carolina
MI	Metropolitan Detroit Center for Independent Living
TX	Panhandle Independent Living Center
CA	Dayle McIntosh Center
WA	Spokane Center for Independent Living

As an incentive to participate, the reports generated by the pilot reviews in FY2019 were not made public. However, CILs were strongly encouraged to work with the training and technical assistance provider to resolve findings (if applicable) in a timely manner.

Each CIL was provided notice that if it failed to make timely progress to address and resolve findings in the compliance report. ACL reserved the right to pursue enforcement action related to these findings as it deems appropriate, including the recovery of funds, draw down restrictions, funds withholding, or grant terminations, pursuant to 45 CFR 1329.7(a).

The pilot identified issue areas that would benefit from network guidance. In response, federal staff developed FAQs on Allowable Advocacy Activities and Conflicts of Interest, initiated a series of compliance learning opportunities through the training and technical assistance provider, and initiated regular network meeting agenda items related to addressing compliance.

On-site Reviews

ACL did not complete any on-site reviews in FY2019; however, ACL completed three on-site reviews in December 2019. At the time of this report, ACL is in the process of publishing reports from these reviews. Because the timing of the on-site reviews extend beyond the period of activities reflected in this report, on-site review activities will be reported in the FY2020 Annual Report on CILs. Three additional on-site reviews were scheduled for FY2020; however, they were postponed due to the COVID-19 pandemic travel restrictions. ACL plans to resume on-site reviews when travel restrictions are lifted and guidance indicates that safe resumption of such reviews is advisable.

Summary: Increased Independent Living

CILs reported robust services and activities throughout PY2019. The data ACL has gathered through PPRs and reviews demonstrate that people with disabilities across the nation benefit by the services and activities provided by CILs. Having freedom of choice, avoiding institutionalization, and having the experiences of living, working, learning, and playing in the community are often made possible only because of the services and activities provided by CILs. The examples provided in this report represent a snapshot of the direct impact CILs have on the lives of people with disabilities.

The data in this report demonstrate that CILs receiving funds under Part C have complied with the standards and assurances in section 725 of the Act.

On-site reviews are a supplement to ACL's broader oversight efforts. An ongoing element of oversight is ensuring that grantees know and understand grant requirements. As ACL identifies non-compliance trends, FAQs are developed and provided to CIL program grantees. Grantees have provided positive feedback on the information they receive through this process and report that the support they receive from federal staff is helpful. ACL anticipates future data collection and additional analysis tools will assist the CIL program in providing robust feedback that will further improve CIL program services, activities, and outcomes.

¹ Sec. 7(17)

² Sec. 725

³ Sec. 725(a)

⁴ Sec. 701

⁵ Sec. 7(18)

⁶ Data collection does not measure intellectual and developmental disabilities directly or exclusively. For purposes of this report, we include individuals reporting cognitive disabilities in the category of I/DD. It is reasonable to conclude data reported as "multiple disabilities" and "other" likely represent additional individuals with I/DD.