SPIL Instrument - 2013 Extension

State: **IOWA**

STATE PLAN FOR INDEPENDENT LIVING (SPIL)

Chapter 1, Title VII of the Rehabilitation Act of 1973, as Amended

STATE INDEPENDENT LIVING SERVICES (SILS) PROGRAM
PART B

CENTERS FOR INDEPENDENT LIVING (CIL) PROGRAM
PART C

FISCAL YEARS 2014 - 2016

Effective Date: October 1, 2013

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Iowa SPIL 14-16 FINAL 5/13/2014

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PART I: Assurances

State of: **IOWA**

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 is **Iowa Vocational Rehabilitation Services (IVRS)**. *34 CFR 76.104(a)(1) and (2); 34 CFR 364.22(a)*

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 is **Iowa Department for the Blind (IDB)**. Indicate N/A if not applicable. *34 CFR 76.104(a)(1) and (2); 34 CFR 364.20(d) and 364.22(c)*

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 is **Iowa Statewide Independent Living Council (Iowa SILC)**. *34 CFR 364.21(a)*

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. *34 CFR 76.104(a)(7); 34 CFR 364.20(c) and (d)*

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. *34 CFR 76.104; 34 CFR 80.11(c)*

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. *34 CFR 76.104(a)(4) and (8)*

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 are **David Mitchell (IVRS)** and **Richard Sorey (IDB)**. *34 CFR 76.104(a)(5) and (6)*

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; and
- 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. *34 CFR 364.20(f)*

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. *34 CFR 364.20(g)(1)*

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 (that is, at least 30 days prior to the public meeting through various media available to the general public, such as newspapers and public service announcements, and through specific contacts with appropriate constituency groups and organizations identified by the DSU and SILC);
- 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. *34 CFR 364.20(g)(2)*

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. *34 CFR 364.20(h*)

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. *34 CFR 364.28*

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. *34 CFR 364.20(e)*

Section 3: Independent Living Services

3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other funds. *34 CFR 364.43(b)*

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. *34 CFR 364.43(c)*

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. *34 CFR 364.30*

3.4 Participating service providers meet all applicable State licensure or certification requirements. *34 CFR 365.31(c)*

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. *34 CFR 364.40(a), (b) and (c)*

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. *34 CFR 364.41(a)*

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. *34 CFR 364.41(b)*

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. *34 CFR 364.23(a*)

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 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. *34 CFR 364.23(b)*

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. *34 CFR 364.24*

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. *34 CFR 364.31*

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. *34 CFR 364.34*

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. *34 CFR 364.35(a) and (b)*

7.2 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 with respect to the records that are required by 34 CFR 364.35 and *.36*

7.3 All recipients of financial assistance under parts B and C of chapter 1 and chapter 2 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. *34 CFR 364.37*

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). *34 CFR 364.56(a)*

Section 9: Signatures

After having carefully reviewed all of the assurances in sections 1 - 8 of this SPIL, the undersigned hereby affirm that the State of IOWA is in compliance and will remain in compliance with the aforementioned assurances during 2014-2016 (specify the three-year period covered by this SPIL). The effective date of this SPIL is October 1, 2013 (year)

6/28/2013

SIGNATURE OF SILC CHAIRPERSON — DATE

Jeff Jasper, President, Iowa Statewide Independent Living Council (SILC)

NAME OF SILC CHAIRPERSON

6/28/2013

SIGNATURE OF DSU DIRECTOR — DATE

David Mitchell, Administrator, Iowa Vocational Rehabilitation Services (IVRS)

NAME AND TITLE OF DSU DIRECTOR

6/28/2013

SIGNATURE OF DIRECTOR OF THE SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND — DATE

Richard Sorey, Director, Iowa Department for the Blind (IDB)

NAME AND TITLE OF THE DIRECTOR OF THE SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

State of: IOWA

Part II: Narrative

Section 1: Goals, Objectives and Activities

1.1 Goals and Mission – 34 CFR 364.42(b)(1)

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.

DESCRIPTION OF THE IOWA INDEPENDENT LIVING NETWORK

The Rehabilitation Services Administration (RSA) requested that the Iowa Independent Living Network partners make some minor changes to the SPIL document that was submitted to RSA before RSA could approve the document. Most of the changes were minor wording changes and do not change the intent or basis of the SPIL that the partners agreed upon. During the course of this SPIL, the Iowa Independent Living Network partners will seek consumer input on this revised version of the SPIL for the next SPIL cycle.

The Iowa Independent Living Network is comprised of the current six Centers for Independent Living (CILs), the Iowa Statewide Independent Living Council (SILC), Iowa Vocational Rehabilitation Services (IVRS), and Iowa Department for the Blind (IDB). The CILs, IVRS, and IDB provide independent living services to Iowans with disabilities, regardless of type of disability, age, gender, race, or sexual orientation. The services provided assist Iowans with disabilities to live independently in the communities of their choice. The Iowa SILC partners with the CILs, IVRS, and IDB to help strengthen and expand the Iowa Independent Living Network, including the promotion of increased community based services and resources for Iowans with disabilities. The SILC's role is limited to the duties outlined in Section 705 of the Rehabilitation Act, as amended, and as detailed in Technical Assistance Circular (TAC13-01) concerning the roles and responsibilities of the SILC.

Iowa Independent Living Network Preferred Vision

The Iowa Independent Living Network envisions an Iowa where ALL people with disabilities have equal opportunity to live, work, and recreate in the communities they choose. All of our citizens, in all 99 counties, shall be able to access necessary benefits, supports, and resources. All citizens shall be recognized for their ABILITY to contribute in society.

The Iowa Independent Living Network operates under the guidelines of the federal Rehabilitation Act of 1973 as amended, and advocates for and promotes resources and public policy, including but not limited to:

- Promoting public policy that upholds the US Supreme Court *Olmstead* Decision, including advocating for funding and access to home and community-based resources and supports, so that all people with disabilities can live independently.

- Promoting public policy that redirects funds from institutional care to home-based community living.
- Promoting public policy that supports the Americans with Disabilities Act (ADA), which is a guideline to make ALL aspects of daily living accessible for anyone with a disability, regardless of the type of disability.
- Promoting public education to eliminate the stigma associated with all types of disabilities, and promoting public education on the abilities and potential that each person has to contribute in their community and in society.

Iowa Independent Living Network: Values

- ***Independent Living Philosophy*** - IL Network members shall promote the IL Philosophy, including consumer control, consumer choice, and full community integration of all persons with disabilities.
- ***Teamwork*** - IL Network members shall use open communication, shall exhibit mutual respect, and shall work together to support independent living in Iowa.
- ***Best Practices*** - Network members will strengthen their programmatic operations through provision of services that are consistent with found best practices whenever possible.
- ***Fiscal Responsibility*** - Network members and the Network itself shall be transparent and accountable for all funds received. Monies shall be used to provide the most efficient and best services for the people and communities we serve.

GOALS OF IOWA'S INDEPENDENT LIVING NETWORK

Goal #1: The current six Iowa Centers for Independent Living and the Iowa SILC will demonstrate fiscal and programmatic accountability, and strong communication and collaboration between the CILs, SILC, and DSUs.

Goal #2: The current six Iowa Centers for Independent Living will conduct at least one resource development activity annually to develop potential funding resources to meet the needs of each Center.

Goal #3: CIL Staff, Boards, and Consumers will conduct systems change advocacy that promotes independence for people with disabilities.

Goal #4: The Iowa CIL Network will conduct systems change advocacy for additional state and federal funding to support the strengthening of current Iowa CILs, and/or the development of new Iowa CILs and/or expansion of current Iowa CILs, consistent with CIL's signed Lobbying Certificate and OMB Circular A-122, Item 25 concerning lobbying and influencing legislators.

Goal #5: CILs and the SILC will work to develop and promote Leadership Initiatives for both adults and young adults with disabilities, and will work to collaborate with other disability organizations.

1.2 Objectives – 34 CFR 364.42(a)(1) and (d); 34 CFR 364.32; 34 CFR 364.33

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

Iowa Independent Living Network
3 Year Strategic Plan
10/1/2013 to 9/30/2016

Goal #1:	**The current six Iowa Centers for Independent Living and the Iowa SILC will demonstrate fiscal and programmatic accountability, and strong communication and collaboration between the CILs, SILC, and DSUs.**		
Objectives	**Inputs**	**Outputs**	**Outcome Measures**
A. CIL Boards and Directors, and SILC Members and staff, acquire knowledge on fiscal and programmatic requirements.	**A1.** A webinar/teleconference on Board fiscal and programmatic accountability training is scheduled in 2013-2014.	**A1a.** CIL Boards and Directors and SILC Members and staff are given a pre-training survey, and then participate in the webinar/ teleconference on Board fiscal and programmatic accountability training.	**A1a.** Training and post survey is completed by at least 80% all CIL Directors and Board Members and SILC Members and staff by 6/30/2014. Attendance and completion of the training will be verified through the training provider, and a pre and post survey to measure knowledge gained from the training. At least 80% of participant post surveys will show a gain in knowledge from the pre-survey. Training will be provided by the DSU, Independent Living Research Utilization (ILRU) project, the Center for Nonprofit Management, and, other qualified entities. The SILC will not conduct trainings for CILs, but rather, members will receive training on their SILC Roles and Responsibilities, IL Philosophy, etc. CILs will obtain training from the DSUs, ILRU, and other qualified entities.
		A1b. New CIL Board Members and staff, and new SILC Members and staff, will take the archived ILRU and other training.	**A1b.** Training for new Board Members and staff is completed within three months of being on the Board or employed. Completion of the training will be verified by the CIL Director for CIL staff and Board, and the SILC ED for SILC Members.

Goal #1: The current six Iowa Centers for Independent Living and the Iowa SILC will demonstrate fiscal and programmatic accountability, and strong communication and collaboration between the CILs, SILC, and DSUs.

Objectives	Inputs	Outputs	Outcome Measures
A. CIL Boards and Directors, and SILC Members and staff, acquire knowledge on fiscal and programmatic requirements.	**A2.** Schedule for IVRS reviews of the SILC and the CILs who contract with IVRS is as follows, with each CIL reviewed once every three years, and the SILC reviewed monthly: **a.** SCICIL by 6/30/14 **b.** A2I by 9/30/14 **c.** SWICIL by 12/30/14 **d.** TRILC by 6/30//15 **e.** IICIL by 9/30/15 **f.** CICIL by 12/30/2015 **g.** The SILC is reviewed monthly	**A2.** IVRS conducts reviews of CILs once every 3 years, using the RSA checklist and procedures for CIL reviews. SILC submits monthly GAX with documentation of expenditures to IVRS.	**A2.** IVRS reviews show fiscal and programmatic accountability of CILs and the SILC. If problems are found, CILs and SILC will develop a corrective action plans, and IVRS will set a schedule for the corrective action plan to be completed, and will monitor successful completion of the corrective action plan. 100% of CILs and SILC participate, and 100% receive a satisfactory review or IVRS determines satisfactory progress on a corrective action plan.

Goal #1: The current six Iowa Centers for Independent Living and the Iowa SILC will demonstrate fiscal and programmatic accountability, and strong communication and collaboration between the CILs, SILC and DSUs.			
Objectives	**Inputs**	**Outputs**	**Outcome Measures**
B. CILs have fiscal and programmatic reporting tools.	**B.** CIL Directors and their Boards jointly: 1. Assess the CIL's needs for reporting tools for program and fiscal accountability (i.e., the need for funding to purchase a CIL database to track consumer services and outcomes; updated computers; software for accounting such as QuickBooks; funding to have an annual audit, etc.). 2. Develop a plan to obtain the reporting tools, which could include resource development.	**B.** CILs implement their plan to meet the assessed need, and obtain the needed fiscal and/or programmatic tool.	**B.** 100% of CILs provide a written report annually to the SILC ED and DSUs at the SILC Annual Meeting in December, detailing their assessment, plan for meeting the need, and whether or not they obtained the programmatic and/ or fiscal reporting tool.
C. DSU Representatives and a representative of the SILC develop ongoing communication and collaboration by attending one CIL Board Meeting annually at each CIL.	**C.** The SILC ED schedules times with each CIL for the DSUs and SILC representatives to attend one Board Meeting annually.	**C.** The SILC and DSU representatives attend one CIL Board Meeting annually to discuss the Iowa IL Network, current state and/or federal disability policy issues that are of concern, and receive an overview from the CIL Board and staff on CIL operations, including any promising practices they have and any technical assistance needs.	**C.** 100% of CILs participate in this annual collaborative meeting. The SILC and DSU representatives complete a report on each CIL Board Meeting attended, including topics discussed and any needs expressed by the CIL Board and staff. The report is given to the SILC Council and the DSUs, and is shared with SILC Members at quarterly meetings, and with the CIL staff and Board members where the meeting took place.

Goal #2:	**The current six Iowa Centers for Independent Living will conduct at least one resource development activity annually to develop potential funding resources to meet the needs of each Center.**		
Objectives	**Inputs**	**Outputs**	**Outcome Measures**
A. CIL Directors continue to meet at least annually to share ideas on resource development amongst themselves, and to update the Resource Development List they created in 2012.	**A.** CIL Directors will meet at least annually.	**A.** CIL Directors update their CIL Resource Development List annually.	**A.** CIL Directors provide their updated CIL Resource Development List annually to the SILC Council and DSUs at the SILC Annual Meeting in December.
B. Each CIL staff and Board identify additional funding needs for their CIL, and identify and conduct at least one resource development activity that the Center can participate in annually.	**B.** CIL Staff and Boards identify funding needs, and identify one resource development activity to meet that funding need.	**B.** CIL Staff and Boards conduct the identified resource development activity.	**B.** 100% of CILs provide a written report to the SILC and DSUs at the SILC Annual Meeting in December on the identified resource development activity and if it was able to meet the funding need identified by the CIL.

Goal #3:	**CIL Staff, Boards, and Consumers will conduct systems change advocacy that promotes independence for people with disabilities, consistent with the above-mentioned Assurance 9 and OMB Circular A-122, Item 25 concerning lobbying.**		
Objectives	**Inputs**	**Outputs**	**Outcome Measures**
A. Systems change advocacy action is taken to promote state and federal legislation and policies that promote independence for people with disabilities, in compliance with the above noted lobbying restrictions and OMB Circular A-122, Item 25.	**A1.** An Iowa CIL Network Legislative/Policy Committee is formed with membership from CIL Staff and Boards, at least one Consumer from each CIL, and Grassroots Groups.	**A1.** The Iowa CIL Network Legislative/Policy Committee: **a.** Develops an annual state and federal legislative and policy agenda. **b.** Involves consumers in advocating on the identified issues. **c.** Educates policy makers about the impact on the disability community, consistent with above noted signed assurance that CILs sign, including Lobbying Certifications and compliance with OMB Circular A-122, Item 25, concerning prohibition of influencing legislators on specific measures. **d.** Collaborates with other disability groups and organizations, including signing on where appropriate to position statements or other correspondence being produced by these other groups that promotes the rights and needs of people with disabilities.	**A1.** The Iowa CIL Network Legislative/Policy Committee provides an annual report to the SILC and DSUs at the SILC Annual Meeting in December which outlines the legislative/policy agenda and collaborations engaged in, the outcomes of these efforts, and the extent to which consumers conducted self and/or systems change advocacy.

Goal #3:	**CIL Staff, Boards, and Consumers will conduct systems change advocacy that promotes independence for people with disabilities, consistent with the above-mentioned Assurance 9 and OMB Circular A-122, Item 25 concerning lobbying.**		
Objectives	**Inputs**	**Outputs**	**Outcome Measures**
B. The citizens of the state of Iowa will be better educated on IL history and philosophy, and systems change advocacy. This will include people with disabilities who are members of unserved and underserved populations, and include urban and rural populations and minority populations (African American, Asian, Latino, Native American, Pacific Islander).	**B1.** CILs and DSUs will all have an outreach plan. **B2.** An Iowa CIL/DSU Network Outreach Committee will be formed comprised of CILs, DSUs, and Grassroots Groups.	**B1.** CILs and DSUs conduct the outreach. **B2.** The Iowa CIL/DSU Network Outreach Committee will develop tools, in consultation with the SILC, for doing outreach to unserved and underserved populations, including urban and rural populations and minority populations. Members develop a video on CIL services that will be posted on the websites of the SILC, CILs, and DSUs.	**B1.** CILs and DSUs outreach plans, and progress on the outreach activities, are documented in their 704 Reports. **B2.** The Iowa CIL/DSU Network Outreach Committee will submit an annual report on the tools developed and implemented for outreach at the annual SILC Meeting in December.

Goal #4:	**The Iowa CIL Network will conduct systems change advocacy for additional state and federal funding to support the strengthening of current Iowa CILs, and/or the development of new Iowa CILs and/or expansion of current Iowa CILs, consistent with CILs signed Lobbying Certificate and OMB Circular A-122 Item 25 concerning lobbying and influencing legislators.**		
Objectives	**Inputs**	**Outputs**	**Outcome Measures**
A. Active systems change advocacy strategies are implemented for additional state resource development for CILs.	**A1.** The SILC ED compiles 704 Report data from the CILs and creates a report to the Iowa Legislature on the successes of CILs and the need for additional state funding. CIL Directors will review the report and make recommendations for any changes, prior to the report being sent to policy makers and sharing with Consumers and other advocates. **A2.** The Iowa CIL Network Legislative/Policy Committee provides educational materials to Legislators and other policy makers, consistent with OMB A-122, Item 25, concerning the prohibition of using Federal funds to influence and lobby policy makers.	**A1-2.** CIL Boards, staff, and Consumers contact their legislators to discuss the need for additional state funding for CILs.	**A1-2.** Success of this objective is measured by new state funding being appropriated for CILs by September 30, 2016.
B. Active system change advocacy strategies are implemented for additional federal funding for CILs with federal legislators and policy makers, including reauthorization of the federal Rehabilitation Act.	**B.** The Iowa CIL Network Legislative/Policy Committee develops system change advocacy actions at the federal level to educate policy makers on the role of CILs and their states and the impact the Rehabilitation Act has in their communities and nationwide.	**B.** CIL staff, Boards, and Consumers will educate policy makers about IL Philosophy, the role of Centers, and the impact of the Rehabilitation Act in their communities.	**B.** Success of this objective is measured by policy advances for CILs by September 30, 2016.

Goal #5: CILs and the SILC will work to develop and promote Leadership Initiatives for both adults and young adults with disabilities, and will work to collaborate with other disability organizations.			
Objectives	**Inputs**	**Outputs**	**Outcome Measures**
A. Adults age 31 and over with disabilities develop leadership skills through training offered.	**A1** Identify opportunities to collaborate with other disability organizations to develop leadership training for adults ages 31 and over with disabilities. **A2.** Develop the leadership training in collaboration with other disability organizations.	**A1-2.** Implement leadership training in collaboration with other disability organizations.	**A1-2.** At least 85% of the leadership training evaluations show individuals indicating satisfaction with the training and a desire to find a leadership position in the disability field.
B. Young adults ages 18-30 with disabilities develop leadership skills through training offered.	**B1.** Identify and develop opportunities to collaborate with other disability organizations to develop leadership training for young adults ages 18-30 with disabilities. **B2.** Two voting member positions are created on the SILC Council that would be designated for young adults 18-27 with a disability.	**B1.** Implement leadership training in collaboration with other disability organizations. **B2.** SILC works with the Governor's Office and other disability organizations to find appropriate young adults to be appointed to these new positions.	**B1.** At least 85% of the leadership training evaluations show individuals indicating satisfaction with the training and a desire to find a leadership position in the disability field. **B2.** Two young adults, ages 18-27, with disabilities, are appointed to the SILC Council by December 30, 2014.

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. This section of the SPIL must:

– **Identify the populations to be designated for targeted outreach efforts**

The following populations are targeted for outreach:

- Iowans with significant disabilities who reside in one of the 69 counties in Iowa NOT served by CIL services. This would include both urban and rural populations as well as minority populations (African American, Asian, Latino, Native American, and Pacific Islanders).

- Iowans with significant disabilities who reside in one of the 24 counties served by CILs that are UNDERSERVED because Iowa CILs have inadequate funding to be able to hire additional staff to adequately serve the 24 counties that are outside of the six counties where their offices are located. This would include both urban and rural populations as well as minority populations (African American, Asian, Latino, Native American, and Pacific Islanders).

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

As stated above, the geographic communities in which the targeted populations reside include the 69 counties in Iowa NOT served by CIL services. These 69 unserved counties include: Adair, Adams, Allamakee, Audubon, Black Hawk, Bremer, Buchanan, Buena Vista, Butler, Calhoun, Carroll, Cerro Gordo, Cherokee, Chickasaw, Clarke, Clay, Clayton, Crawford, Davis, Decatur, Delaware, Des Moines, Dickinson, Dubuque, Emmet, Fayette, Floyd, Franklin, Greene, Grundy, Guthrie, Hamilton, Hancock, Hardin, Howard, Humboldt, Ida, Jackson, Jefferson, Keokuk, Kossuth, Lee, Louisa, Lucas, Lyon, Marion, Marshall, Mitchell, Monona, O'Brien, Osceola, Palo Alto, Plymouth, Pocahontas, Poweshiek, Ringgold, Sac, Sioux, Tama, Taylor, Union, Van Buren, Wapello, Wayne, Webster, Winnebago, Winneshiek, Worth, and Wright. The other geographic communities in which the targeted populations reside include the 24 counties in Iowa served by CILs that are UNDERSERVED because Iowa CILs have inadequate funding to be able to hire additional staff to adequately serve these 24 underserved counties that are outside of the counties where their offices are located. The 24 underserved counties include Appanoose, Benton, Boone, Cass, Cedar, Clinton, Dallas, Fremont, Harrison, Henry, Iowa, Jasper, Jones, Linn, Madison, Mills, Monroe, Montgomery, Muscatine, Page, Shelby, Story, Warren, and Washington.

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

Goal #3 of the Iowa IL Network Strategic Plan for FFY 2014-2016 states that CIL Staff/Boards/Consumers will conduct systems change advocacy that promotes independence for people with disabilities. Objective B for this goal is for the citizens of the state of Iowa to be better educated on IL history and philosophy, and systems change advocacy. This will include people with disabilities who are members of unserved and underserved populations, and include urban and rural populations and minority populations.

There are two inputs, outputs, and outcome measures for this objective. The first is that CILs

and DSUs will all have an outreach plan that identifies the populations designated for targeted outreach efforts, including geographic areas in which the targeted populations reside and how they will serve individuals with significant disabilities from minority group backgrounds. They will conduct the identified outreach, and will report on their outreach plans and progress on the outreach activities in their annual 704 Reports. The second is that an Iowa CIL/DSU Network Outreach Committee will be formed comprised of CILs, DSUs, and Grassroots Groups. This committee will develop tools for doing outreach to unserved and underserved populations, including urban and rural populations and minority populations. Members of the committee will develop a video on CIL services that will be posted on the websites of the SILC, CILs, and DSUs, along with other tools. The committee will submit an annual report on the tools developed and implemented for outreach at the annual SILC Meeting in December.

Goal #5 of the Iowa IL Network Strategic Plan for FFY 2014-2016 states that CILs and the SILC will work to develop and promote Leadership Initiatives for both adults and young adults with disabilities, and will work to collaborate with other disability organizations in this endeavor. The IL Network, along with several other disability organizations such as Disability Rights Iowa and the Iowa Office of Persons with Disabilities, has identified that many individuals with significant disabilities in Iowa, from both rural and urban settings as well as minority populations, have either no training or very limited training on disability issues, such as the Americans with Disabilities Act (ADA), IL history and philosophy, individual and systems advocacy, and opportunities to participate on Boards or other groups working on disability specific issues. It is felt there is a real need for this type of leadership training in Iowa, and several organizations are willing to collaborate with the SILC and CILs to develop and implement this leadership training, which will include individuals with significant disabilities from both urban and rural areas as well as minority populations.

Iowa Vocational Rehabilitation Services (IVRS) and Iowa Department for the Blind (IDB) are both able to provide independent living services in all 99 counties. However, the reality is that their funding is also very limited, they have waiting lists for services, and they are not able to provide the full range of the four core services that CILs provide. IVRS provides home modifications and assistive technology to consumer partners statewide. They also provide some independent living skills training, information and referral, and peer support programming. IDB provides independent living skills training to Iowans who are blind and who do not qualify for the Older Blind Program or vocational rehabilitation services. IVRS and IDB collaborate with all of the Iowa CILs to ensure there is no duplication of services, and IVRS and IDB generally serve consumer partners who do not live in an area served by a CIL. When they do provide services to a consumer partner in an area served by a CIL, it is because the CIL and the community do not have the resources to provide the service needed by the consumer partner.

Data on Current Iowa CIL Funding

It is important to understand the amount of funding that the six Iowa CILs receive in order to fully understand and appreciate their inability to adequately serve 24 of their 30 county service area (underserved populations), plus their inability to expand to serve any of the other 69 Iowa counties that do not currently have CIL services (unserved population).

The six Iowa CILs will receive an estimated $950,180 in federal Part C/Part B funds and state funds, in 2012-2013, to provide the four core services to consumer partners in 30 of Iowa's 99 counties. This is not adequate funding. CILs do not have enough funding to hire an adequate

amount of staff to be able to fully serve all 30 counties. Further, the federal Part B funds will have a 5.2% across the board cut in 2013, and this could be ongoing to 2014 and after. Also, the federal Part C funds will have a 5.2% across the board cut beginning 10/1/2013, and this cut could also be ongoing, depending on the President's Budget Resolution and Congressional appropriations, including the sequestration across-the-board cuts that may remain in effect for years.

CIL Funding 2012-2013

CIL Name	# of Counties Served	Total Disability Population for Counties Served	Part C Funds 2012-2013	Part B Funds 2012-2013	State Funds 2012-2013	Total Funds 2012-2013
DRC-Sioux City	1	16,937	68,953.00	-0-	-0-	68,953.00
SCICIL-Oskaloosa	3	8,379	103,429.00	11,814.00	10,073.50	125,316.50
IICIL-Quad Cities	3	40,394	103,429.00	11,814.00	10,073.50	125,316.50
SWICIL-Council Bluffs	8	31,812	150,677.00	11,814.00	10,073.50	172,564.50
CICIL-Des Moines	7	84,749	206,857.00	-0-	-0-	206,857.00
A2I-Iowa City	8	57,446	224,096.00	17,003.00	10,073.50	251,172.50
TOTALS	30	239,839	**$857,441**	**$52,445**	**$40,294**	**$950,180**

Federal regulations require that at least 51% of CIL staff be persons with significant disabilities. CILs are to be run **by** people with disabilities **for** people with disabilities. One critical factor that many people with disabilities need is employment that pays a living wage in order to remain independent and not be forced to live in an institution. Many CILs do not have enough funding to be able to offer their staff a competitive wage. Many also do not have enough funding to offer their staff health insurance or retirement benefits.

1.3 Financial Plan – 34 CFR 364.42(a)(2) and (3); 34 CFR 364.29

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.

Financial Plan For The Use Of Federal And Non-Federal Funds To Meet SPIL Objectives

The chart below contains the sources of federal and non-federal funds that are currently available

to meet the SPIL objectives. This financial plan will be modified should additional federal and/or non-federal funds become available, or should a federal budget cut occur. Please refer to Section 3.2 Expansion of the Network for the Guidelines for Modification to the SPIL Financial Plan for Expansion of the Network.

As the federal Sequestration occurred March 1, 2013, there will most likely be at least a 5% cut to the federal Part B funds effective in the 2012-2013 federal fiscal year, and ongoing into the 2013-2014 federal fiscal year, which is the first year of this new SPIL. There most likely will also be at least a 5% cut to the federal Part C funds effective in the 2013-2014 federal fiscal year, which is the first year of this new SPIL.

The chart below does not include the 5% cut to Part B or Part C funds. If these funds are cut, Section 3.2 Expansion of the Network, in the section titled Guidelines for Modifications to the SPIL Financial Plan for Expansion of the Network, there are guidelines for how cuts to Part B and Part C will be handled.

As can be seen from the chart below, with no cuts the SPIL Financial Plan totals $1,304,663. With the 5% cuts to Part B and Part C, the total will be reduced to $1,246,202. This is a loss of $58,461. This is a significant amount, given that the Iowa CILs, SILC, and DSUs are already severely underfunded.

SPIL Financial Plan FFY 2014-2016
(same annual budget for each of the 3 years of the SPIL based on current resources)

Sources	Approximate Funding Amounts and Uses				
	SILC Resource Plan	IL Services (Voc Rehab, IDB)	General CIL Operations	Other SPIL Activities	TOTALS
Title VII Funds Chapter 1, Part B	IDB: $7,666 IVRS: $69,019 Total: $76,685	IDB: $51,426 IVRS: $117,630 Total: $169,056	IDB CILs: -0- IVRS CILs: $49,718		IDB: $51,426 IDB (SILC): $7,666 IVRS (IVRS): $117,630 IVRS (SILC): $69,019 IVRS (CILs): $49,718 Total All: $295,459
Title VII Funds Chapter 1, Part C			RSA CILs: $812,592		RSA CILs: $812,592
Chapter 2, Older Blind Individuals					
Sec. 101(a)(18) of the Act (Innovation & Expansion)	IDB: $9,000 IVRS: $36,000 Total: $45,000				IDB (SILC): $9,000 IVRS (SILC): $36,000 Total: $45,000
SSA $ for Services	IDB: -0- IVRS: $4,106				IVRS (SILC) $4,106 Total: $4,106
Non-Federal Funds					
State Funds		IDB: $6,928 IVRS: $39,128 Total: $46,056	STATE CILs: $40,294		STATE (IDB) 6,928 STATE (IVRS) 39,128 STATE (CILs) 40,294 Total: $86,350
Other					
TOTALS:	IDB: $16,666 IVRS: $109,125 Total SILC: $125,791	IDB: $58,354 IVRS: $156,758 Total IVRS/IDB: $215,112	IDB: -0- IVRS CILs: $49,718 RSA C for CILs: $812,592 STATE CILs: $40,294 Total CILs: $902,604	-0-	IDB: $58,354 IVRS: $156,758 SILC: $125,791 CILs: $902,604 Total: $1,243,507

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.

Financial Plan For The Use Of Federal And Non-Federal Funds To Meet SPIL Objectives

The chart above contains the sources of federal and non-federal funds that are currently available to meet the SPIL objectives. This financial plan will be modified should additional federal and/or non-federal funds become available, or should a federal budget cut occur. Please refer to Section 3.2 Expansion of the Network for the Guidelines for Modification to the SPIL Financial Plan for Expansion of the Network.

The CILs, SILC, and DSUs have all taken a significant cut to their budgets from 2008-2009 to 2014-2016. For this new SPIL, the IL Network is operating on $381,762 LESS than what they had in 2008-2009.

It should also be noted that the DSUs experienced a 30% cut in all of their programs, including their IL programs, from 2008 to 2010. That impacted all aspects of the DSU operations. In the last SPIL, beginning in 2010, it was no longer possible for the DSUs to absorb this loss without also impacting the funds available to support the SILC. As a result, the DSUs found it necessary to reduce SILC funds by almost 14% in 2010 for the 2010-2013 SPIL. The SILC was receiving $150,894 in funding, and this was cut to $130,000 as of 10/1/2010. For 09-10, 10-11, and 11-12, IVRS allowed the SILC to carry over any remaining funding at the end of the year to help offset this budget cut. The SILC was very frugal with expenditures, and was able to carry over about $10,000 each year to help cover any necessary expenses in the following year that exceeded the $130,000 annual funding. During the 2011-2012 federal fiscal year, IVRS made the decision to no longer allow the SILC to carry over funding, which meant the SILC had to expend all remaining funds by September 30, 2012. IVRS felt this budgeting practice had the potential to produce incentives which conflict with Iowa SILC's mission. IVRS also expressed the carry forward practice led to misperceptions for monies available and potentially impacted decisions being made by the Council. IVRS expressed the carry forward dollars were never meant to be a part of a permanent operating budget, but were supposed to be allocated to meet current and on-going operating expenses for immediate service delivery. The SILC was not in agreement with the rationale provided by IVRS, but as IVRS is the fiscal agent for the funds the SILC receives, the Council had no other option other than to accept their decision.

The SILC created the 2012-2013 budget based upon the $130,000 in funding that is the SILC's annual appropriation of federal Part B, Title I Innovation and Expansion, and SSA Reimbursement funds. However, the SILC found there was not enough money to be able to meet all of the SILC's basic operational needs, so the SILC had to add in $3,724 in unrestricted donation funds in order to meet the needs of the SILC. Even adding in this amount, it still meant that the SILC needed to do some additional cuts to the budget.

Due to the federal Sequestration, the SILC is going to receive another 5.2% cut to the Part B funds. The SILC receives $80,894 in Part B funds. A 5.2% cut equals $4,209. That is a huge cut for the SILC since the total funding received is only $130,000. This will reduce the SILC budget to $125,791 for this three year SPIL.

The SILC will do its best to fulfill its responsibilities as charged under the Rehab Act, and will try to carry out its essential functions without a significant change in level of activity. However, this is becoming very difficult with the ongoing funding cuts.

Part B and Part C funds are used by the CILs for their general operational costs needed to provide the four core services and serve their consumer partners. This includes the work they do to provide outreach to underserved and unserved populations, including urban and rural and minority populations (SPIL Goal 3, Objective B). The Part B funds are used by IVRS and IDB to provide independent living services statewide, and to provide outreach to underserved and unserved populations, including urban and rural and minority populations (SPIL Goal 3, Objective B). Both the Part B and C funds for CILs, and the Part B funds for the DSUs, will be used to participate and/or collaborate in all 5 SPIL Goals.

Part B and Part C funds are used by the CILs for their general operational costs needed to provide the four core services and serve their consumer partners. This includes the work they do to provide outreach to underserved and unserved populations, including urban and rural and minority populations (SPIL Goal #3, Objective B). The Part B funds are used by IVRS and IDB to provide independent living services statewide, and to provide outreach to underserved and unserved populations, including urban and rural and minority populations (SPIL Goal #3, Objective B). Both the Part B and C funds for CILs, and the Part B funds for the DSUs, will be used to participate and/or collaborate in all 5 SPIL Goals.

The Part B funds are used by the SILC for their general operational expenses, and will be used to participate and/or collaborate in all 5 SPIL Goals.

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

The six Iowa Centers for Independent Living receive $812,592 in federal Regular Part C funding, and $49,718 in federal Regular Part B funding, for total federal funding of $862,310. They also receive $40,294 in state funding, for a combined state and federal total of $902,604. CILs use this funding for their basic operating expenses to provide the federally required four core services to their consumer partners.

The Iowa Statewide Independent Living Council receives $45,000 in Title I Innovation and Expansion funding ($36,000 from IVRS and $9,000 from IDB), and $76,685 in federal Regular Part B funding ($69,019 from IVRS and $7,666 from IDB), and $4,106 in SSA Reimbursement funds (from IVRS) for total federal funding of $125,791. The SILC uses these funds for their basic operational expenses to carry out the SILC duties required by the federal Rehabilitation Act, including the activities, monitoring, and evaluation of the State Plan for Independent Living.

Iowa Vocational Rehabilitation Services Independent Living Program receives $117,630 in federal Regular Part B funds, $39,128 in state match for the federal Regular Part B funds, for total federal and state funding of $156,758. IVRS uses this funding to provide home modifications and assistive technology to consumer partners statewide. They also provide the four core services of independent living.

The Iowa Department for the Blind Independent Living Program receives $51,426 in federal Regular Part B funds, and $6,928 in state match for the federal Regular Part B funds, for a total federal and state funding of $58,354. IDB utilizes these funds to provide independent living skills training to Iowans who are blind and who do not qualify for the Older Blind Program or vocational rehabilitation services.

IVRS and IDB collaborate with all of the Iowa CILs to avoid duplication of services, and IVRS and IDB generally serve consumer partners who do not live in an area served by a CIL. When they do provide services to a consumer partner in an area served by a CIL, it is because the CIL and the community do not have the resources to provide the service needed by the consumer partner.

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.

Not applicable.

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

Please refer to **Section 3.2 Expansion of the Network** for the Guidelines for Modification to the SPIL Financial Plan for Expansion of the Network.

1.4 Compatibility with Chapter 1 of Title VII and the CIL Work Plans – 34 CFR 364.42(c) and (e)

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 SPIL's FFY 2014-2016 goals and objectives lay a foundation for the accomplishment in Iowa of the purposes of Chapter 1 of the Rehabilitation Act, "to promote a philosophy of independent living…in order to maximize the leadership, empowerment, independence and productivity of individuals with disabilities, and [their] integration and full inclusion…into the mainstream of American society."

Goal #1 will assist CILs and the SILC with developing and keeping strong fiscal and programmatic accountability, along with increased communication, partnership, and collaboration between the CILs, SILC, and DSUs. This will strengthen the Iowa IL Network so they are better able to accomplish the purposes of Chapter 1 of the Rehabilitation Act.

Goal #2 will help strengthen the funding sources of the CILs, so they have the resources needed to accomplish the purpose of Chapter1 of the Rehabilitation Act.

Goal #3 addresses systems change advocacy that will help promote the independence of people with disabilities, including unserved, underserved, rural, urban, and minority populations.

Goal # 4 will help strengthen the federal funding sources and regulations for CILs, so they have the resources needed to accomplish the purpose of Chapter 1 of the Rehabilitation Act.

Goal #5 will promote leadership training across the state, in collaboration with other disability groups, which will help promote the independence of people with 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.

Consideration of CIL priorities under section 725(c)(4) of the Act was ensured by the process established for the development of the SPIL. All CILs were invited to participate actively in the development and review of the drafts. Input was secured from all CILs concerning resource needs prior to the development of the Resource Plan, and the plan is based solidly on that input.

All CIL Directors, as well as some of their staff and some of their Board Members, participated in a number of, teleconferences and e-mail discussions that were conducted to develop the new SPIL. CILs assisted with and participated in the public meeting on the SPIL in May of 2013.

1.5 Cooperation, Coordination, and Working Relationships Among Various Entities – 34 CFR 364.26

Describe the steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC, and centers;

The steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC and CILs are:

1) Inclusion of CILs in attending the quarterly SILC Council Meetings.
2) Inclusion of CIL representatives on SILC Committees.
3) Consultation between the SILC and ISAIL/CILs on joint position statements on IL issues, especially issues related to disability services.
4) Routine sharing of information about SILC, DSUs and CIL priorities at quarterly SILC meetings.
5) Regular contacts by phone, e-mail and in-person between the SILC Executive Director and CIL Executive Directors throughout the year.
6) SILC ED and DSU representatives will attend at least one CIL Board Meeting annually for each CIL to develop relationships and discuss IL issues.
7) The two Designated State Units (DSUs), Iowa Department for the Blind (IDB) and Iowa Vocational Rehabilitation Services (IVRS), will continue to provide adaptive devices, home modifications, specialized blindness services, and other independent living services statewide, as funding allows.
8) Centers for Independent Living and the DSUs will continue to provide the four core services in their service areas.
9) The Centers for Independent Living (CILs) and the Designated State Units (DSUs) will continue to collaborate and coordinate to avoid duplication of services and to promote consumer choice.

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.**

The steps that will be taken to maximize the cooperation, coordination and working relationships among the DSUs, other state agencies represented on the SILC, other councils that address the needs of specific disability populations and issues, and other public and private entities include continuation of:

1) Representation of the DSUs on the SILC as ex-officio non-voting members.
2) Representation of the SILC on the State Rehabilitation Council.

3) Representation of the SILC Executive Director and/or a SILC Council Member on the Olmstead Consumer Taskforce, which works with 19 State agencies to eliminate barriers to community living.
4) Representation of the SILC Executive Director on the Iowa Disability Advocates Network (IDAN) of aging and disability organizations engaged in promoting adequate funding and other resources for long term community supports, ease of access, service quality, etc.
5) Ongoing communication with and technical assistance to the SILC by the Center for Disabilities and Development (University of Iowa Center for Excellence on Disability), which is engaged with the Iowa Department of Human Services in several significant systems transformation initiatives which need consumer/family involvement.
6) The SILC and CILs will be working with Disability Rights Iowa, Iowa Office of Persons with Disabilities, and other disability groups to develop and implement some type of regional leadership training across the state for people with disabilities.

1.6 Coordination of Services – 34 CFR 364.27

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.

Centers for Independent Living, IVRS, and IDB collaborate with a variety of agencies to provide services and resources for the consumer partners they serve, and work to ensure there is no duplication of services. Examples of collaborations include:

- Iowa Department of Education - Special Education
- Iowa Vocational Rehabilitation Services – VR Education
- Iowa Governor's Developmental Disabilities Council
- Iowa Department of Public Health
- Iowa Department of Human Services - Mental Health & Disabilities Division
- Iowa Housing Authority
- Iowa Department of Transportation
- Iowa Veterans Services
- other programs under XVIII - XX of the Social Security Act

CILs and DSUs coordinate services and resources with other providers to ensure independent living services funds are used as the last resource in order to ensure the funds are well utilized. In other words, if a consumer partner is eligible for another program/service, CILs and DSUs will assist them to apply for that program/service. This ensures that there is no duplication of services and ensures that independent living services funds are utilized for individuals who would otherwise be unserved by other resources.

Services are coordinated at the local level between the CILs and DSUs to avoid duplication and to maximize self-direction on the part of the individual consumer. The services provided by the DSUs are unique, specialized, and targeted to meet a service niche for which other resources do not exist or are minimally available. The use of comparable benefits is pursued whenever practical to ensure that Part B dollars are spent on services not otherwise available and targeted

to people otherwise unable to be served. When other resources do exist, this information is made available to consumer partners, consistent with the practice of informed choice and consumer control. The DSUs and CILs do exchange referrals, recognizing that each provider offers unique services necessary for consumers to reach their independent living goals.

1.7 Independent Living Services for Individuals who are Older Blind – 34 CFR 364.28

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.

The Program Manager of the Older Individuals who are Blind (OIB) program serves as an ex-officio non-voting member of the SILC and regularly reports on OIB activities at SILC meetings, including any new methods or approaches to serving the Older Blind population.

Section 2: Scope, Extent, and Arrangements of Services

2.1 Scope and Extent – 34 CFR 364.42(b)(2)(3); 34 CFR 364.43(b); 34 CFR 364.59(b)

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, as follows:			
- Information and referral	X	X	X
- IL skills training	X	X	X
- Peer counseling	X	X	X
- Individual and systems advocacy	X	X	X
Counseling services, including psychological, psychotherapeutic, and related services			
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)	X		X
Rehabilitation technology	X		
Mobility training	X		X
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	X		X

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)
Personal assistance services, including attendant care and the training of personnel providing such services			X
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services			X
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			X
Education and training necessary for living in the community and participating in community activities			X
Supported living			
Transportation, including referral and assistance for such transportation			X
Physical rehabilitation			
Therapeutic treatment			
Provision of needed prostheses and other appliances and devices			
Individual and group social and recreational services			X
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			X
Services for children with significant disabilities			X
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			X
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future			X

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)
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	X		X
Other necessary services not inconsistent with the Act			X

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

This SPIL has identified the need to prioritize new funding to support the existing six CILs who have 24 UNDERSERVED counties. These 24 underserved counties are all the counties the CILs serve outside of the county where their office is located. These counties are primarily rural counties, and include Appanoose, Benton, Boone, Cass, Cedar, Clinton, Dallas, Fremont, Harrison, Henry, Iowa, Jasper, Jones, Linn, Madison, Mills, Monroe, Montgomery, Muscatine, Page, Shelby, Story, Warren, and Washington.

The Iowans with disabilities who reside in these counties do not receive adequate outreach and services from the current 6 CILs because there is not enough funding to hire adequate staff to cover these counties fully.

Each CIL and both DSUs have plans and descriptions of progress, which they outline in their annual 704 Reports, as to the unserved and/or underserved populations they serve, including urban and rural populations and minority populations (African American, Asian, Latino, Native American, and Pacific Islander).

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.**

Not Applicable.

2.2 <u>Arrangements for State-Provided Services – 34 CFR 364.43(d) and (e)</u>

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.

Iowa DSUs distribute some of their Title VII, Chapter 1, Part B funds to Iowa CILs to provide IL services. This funding is provided to the CILs through a contracting process, which requires a work plan, budget, and budget narrative. Starting in FFY 2008, IVRS became the fiscal agent for the CIL contracts. During the FFY 2010 IVRS developed a new contracting process based

on the recommendations made by RSA staff and the Iowa Attorney General's office. This process improved the contracting process and outcomes by increasing the accountability of all parties involved.

Each CIL charges different costs toward the Part B funds. In FFY 2010, all CILs re-applied for the Cost Allocation Plan (CAP) with the US Department of Education. When a CIL uses the Part B funds toward general operational cost, the CIL's CAP ratio is applied; therefore, only a fraction of the general operations costs are charged against Part B funds. Some of the CILs charge the direct costs against the Part B funds, in which case CILs are reimbursed for 100% of the costs.

The Iowa CILs also received an Iowa state appropriation in SFY 2009 of $250,000. In 2010 this amount was reduced to $45,000, in 2011 it was reduced to $43,227, and in 2012 it was reduced to $40,294, which was also the amount for 2013. IVRS is the fiscal agent for this contracting process as well.

In addition to CILs, both Iowa DSUs provide Statewide Independent Living Services (SILS). The IVRS SILS program uses some Part B funds and state match to provide assistive technology, home modifications, Information and Referral, and Systems and Individual Advocacy services.

The IDB Independent Living Program uses their federal Part B funds and state match to provide independent living skills training to individuals who are blind, not vocationally orientated, and who are 54 years old and younger.

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.

If IVRS contracts with a CIL for the support of their general operation, the CIL will require an IL specialist (or comparable staff) to make a determination of eligibility and maintain a consumer service record for each consumer, and jointly develop an IL Plan, unless a waiver is signed. In the contract between IVRS and the CILs indicated in Section 7.C., it is required that the sub-recipients (the CILs) are responsible for quality control of their staff and the service provision.

Section 3: Design for the Statewide Network of Centers

3.1 <u>Existing Network – 34 CFR 364.25</u>

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.

Iowa has 99 counties. The six Iowa Centers for Independent Living (CILs) currently serve 30 of the 99 counties with the required four core services. All six of the Iowa CILs are severely underfunded, and 24 of the counties they serve are <u>underserved</u> due to lack of funding. Iowa Vocational Rehabilitation Services provides services in all Iowa counties as funding allows, primarily with home modifications and assistive technology. Iowa Department for the Blind provides services in all 99 counties as needed and as funding allows.

Iowa's Existing Network of Centers for Independent Living

CIL Name	# of Counties Served in 2005-2006	Disability Population in Counties Served By Each CIL (Disability Counts Data)	Counties Served	Counties Currently Served that are UNDERSERVED Due to Lack of CIL Funds
DRC Sioux City	1	16,937	**Woodbury** (1)	N/A
SCICIL Oskaloosa	3	8,379	Appanoose, **Mahaska**, Monroe (3)	Monroe, Appanoose (2)
IICIL Quad Cities	3	40,394	Clinton, Muscatine, **Scott** (3)	Clinton, Muscatine (2)
SWICIL Council Bluffs	8	31,812	Cass, Fremont, Harrison, Mills, Montgomery, Page, **Pottawattamie**, and Shelby (8)	Cass, Fremont, Harrison, Mills, Montgomery, Page, Shelby (7)
CICIL Des Moines	7	84,749	Boone, Dallas, Jasper, Madison, **Polk**, Story , and Warren (7)	Boone, Dallas, Jasper, Madison, Story , and Warren (6)
A2I Iowa City	8	57,446	Benton, Cedar, Henry, Iowa, **Johnson**, Jones, Linn, Washington (8)	Benton, Cedar, Henry, Iowa, Jones, Linn, Washington (7)
Total CILs	**30**	**239,717**	**30**	**24**

BOLD depicts the main county served by each CIL.

3.2 Expansion of Network – 34 CFR 364.25

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).

In April of 2012, the Northeast Iowa Center for Independent Living (NEICIL) in Waterloo, Iowa, closed. Per the approved 2012 SPIL Amendment, RSA held a grant competition to find a suitable candidate to award the Part C funds to that were previously given to the NEICIL in order to reopen a CIL in that service area. RSA did not find a suitable candidate to award the funds to, so per the approved SPIL Amendment, RSA distributed the Part C funds to the remaining 6 Iowa CILs based upon the current percentage of Part C funds that each CIL received. Iowa Vocational Rehabilitation Services (IVRS) divided up the federal Part B funds and State Funds that the NEICIL was receiving equally between four of the remaining six CILs who were eligible to do contracts with IVRS.

As a result of this CIL closure, Iowa now has six CILs that serve 30 of the 99 counties. These six CILs continue to be very underfunded, and are only able to adequately serve six of the 30 counties they serve in the counties where the office of each CIL is located. To be able to adequately serve all 30 counties, they would need additional funding to pay for additional staff salary, benefits, and mileage to adequately serve their outlying counties. That means that of Iowa's 99 counties, six counties are adequately served, **24 are underserved**, and **69 are unserved** by CIL services.

The two Iowa Designated State Units, Iowa Vocational Rehabilitation Services (IVRS) and Iowa Department for the Blind (IDB), both operate State Independent Living Services programs. Although both IVRS and IDB can provide services statewide in all counties, both agencies are also extremely underfunded, so most of the state continues to be underfunded for Independent Living Services.

Guidelines for Modification to the SPIL Financial Plan for Expansion of the Network 2013-2014 and 2014-2015 and 2015-2016

The first priority of the federal Rehabilitation Act is to develop a new CIL to serve counties unserved by CIL services when new federal Part C funding becomes available. In order to meet that priority in Iowa, these are the conditions that MUST EXIST for new federal funds to be used to start a NEW CIL:

In order for new federal Part C funds to be utilized to start a new Center for Independent Living, all of the following four conditions MUST exist:

1. The current six CILs are all funded at 100% of their specified Adequate Level of Funding per Priority 1 below.

2. There is a minimum of $250,000 remaining in new federal Regular Part C funding to start a new CIL AND the new CIL must serve three counties. The CILs, SILC, and DSUs have drafted an itemized budget that outlines the minimum costs for starting up a new CIL serving 1-3 counties, which is $250,000, and this document is on file in the SILC office. Priority for a new CIL will be given to opening a new Center in the Waterloo area where a previous CIL closed. This would include serving at least three of the five counties of Black Hawk, Buchanan, Bremer, Butler, and Grundy. If there is less than $250,000 remaining in new federal Part C funds, the priority will be to distribute the funds proportionately among the existing CILs even if they have reached their Adequate Level of Funding.

3. The group who wants to start a new CIL has provided assurances that they will comply with the standards and indicators for CILs as outlined in the Federal Rehabilitation Act as well as the fiscal and programmatic reporting requirements as identified in the Act.

4. The new federal funding must NOT be one time federal funding that will end. No one time federal funding may be used to start a new CIL. One time federal funding is any federal funding that is not ongoing and that is a one-time funding appropriation with no continued funding in subsequent years, or no continued funding after 1-5 years.

1. Federal Regular Part C Funds Funding Priorities

Priority #1 – Bring the existing 6 CILs up to the Adequate Level of Funding as specified below.

Whenever new federal Part C funds are appropriated, the amount of the new federal Part C funds OVER COLA will be distributed to the six Iowa CILs based upon the current percentage of Part C that each CIL receives, until every CIL has reached 100% of its Adequate Level of Funding as specified in this SPIL. Once a CIL has reached 100% of Adequate Level of Funding, the remaining funds will be distributed to the other CILs who are not yet at their Adequate Level of Funding. All CILs must be at their Adequate Level of Funding before any new federal Part C funds can be utilized to start a new Center, as specified below.

Formula For Adequate Level Of Funding

The Iowa CILs developed a Funding Formula that details an itemized budget of the minimum amount of funding required to operate a CIL with three or fewer counties. The minimum amount of funding was determined to be $250,000 (Adequate Level of Funding for 1-3 counties) based upon known operating costs of number of staff and their salaries and benefits, along with other costs of operation such as rent, supplies, mileage, insurance, and so forth.

The Iowa CILs then created a second detailed itemized budget that outlines costs associated with adding one county. The amount of additional funding was determined to be $34,000 per county based on hiring additional staff and the associated costs.

However, to provide a more fair distribution of funds overall for the total current counties that each CIL is serving, a formula was developed to distribute half of this amount per counties over 3 based on total number of counties served over three counties, and half on the disability population in the total counties served.

Iowa CIL Funding Formula

- 1-3 Counties Served: A Minimum $250,000 budget, plus an additional amount based on the total disability population in the total counties served by each CIL, as a higher population will require additional funds to hire adequate staff to serve the population.
- For all counties served over 3, add $34,000 per county, with $17,000 based on the formula for number of counties served by each CIL over 3, and $17,000 based on the total disability population in the total counties served by each CIL.

Below is a chart which outlines the Adequate Funding Level needed for each CIL. The current amount of Part B and Part C funds that each CIL is to receive in 2013-2014 is indicated in the chart. Should the Part B funds be reduced or increased for any CIL for any reason during the 3 year SPIL period, this will change the total amounts that a CIL needs to reach the Adequate Funding Level Needed.

CALCULATION CHART FOR 100% ADEQUATE FUNDING LEVEL FOR EACH CIL

CIL	Number of Counties Served	Number of Counties OVER 3	Total Disability Population in Counties Served	Total Disability Population in Counties Served Divided by 10,000	Minimum Funding for 1-3 Counties	Funding Per Additional County $17,000 x # of Additional Counties Over 3	Funding Per Stakeholder At $17,000 Per Every 10,000 PWDs	Adequate Funding Level Needed Per CIL
DRC	1	0	16,937	1.6937	+$250,000	-0-	+28,793	$278,793
SCICIL	3	0	8,379	.8379	+$250,000	-0-	+14,244	$264,244
IICIL	3	0	40,394	4.0394	+$250,000	-0-	+68,670	$318,670
SWICIL	8	5	31,812	3.1812	+$250,000	+85,000	+54,080	$389,080
CICIL	7	4	84,749	8.4749	+$250,000	+68,000	+144,073	$462,073
A2I	8	5	57,446	5.7446	+$250,000	+85,000	+97,658	$432,658
TOTALS:	**30**	**14**	**239,717**	**N/A**	**$1,750,000**	**$272,000**	**$461,807**	**$2,145,518**

Priority # 2 – Further Expanding of Iowa's IL Network of CILs Into Additional UNSERVED Counties, Including the Development of a New CIL

Should federal increases in Regular Part C funds satisfy Priority #1 above, and there is additional funding available, the second priority is expansion of the IL Network to additional counties that are currently UNSERVED by CIL services. These 69 unserved counties include: Adair, Adams, Allamakee, Audubon, Black Hawk, Bremer, Buchanan, Buena Vista, Butler, Calhoun, Carroll, Cerro Gordo, Cherokee, Chickasaw, Clarke, Clay, Clayton, Crawford, Davis, Decatur, Delaware, Des Moines, Dickinson, Dubuque, Emmet, Fayette, Floyd, Franklin, Greene, Grundy, Guthrie, Hamilton, Hancock, Hardin, Howard, Humboldt, Ida, Jackson, Jefferson, Keokuk, Kossuth, Lee, Louisa, Lucas, Lyon, Marion, Marshall, Mitchell, Monona, O?Brien, Osceola, Palo Alto, Plymouth, Pocahontas, Poweshiek, Ringgold, Sac, Sioux, Tama, Taylor, Union, Van Buren, Wapello, Wayne, Webster, Winnebago, Winneshiek, Worth, and Wright.

The expansion of the network can include development of new CILs in unserved counties as well as expansion of current CILs into unserved counties.

There must be a minimum funding level of $250,000 remaining in new federal Regular Part C funding in order to start a new CIL AND the new CIL must serve one to three counties. The CILs, SILC, and DSUs have drafted an itemized budget that outlines the minimum costs for starting up a new CIL serving 1-3 counties, which is $250,000, and this document is on file in the SILC office. Priority for a new CIL will be given to opening a new CIL in the Waterloo area where a previous CIL closed. This would include serving at least three of the five counties of Black Hawk, Buchanan, Bremer, Butler, and Grundy.

In either case, RSA will hold a competition to start the new CIL in counties currently unserved by CIL services, or to expand existing CILs into counties currently unserved by CIL services. The priority for a new CIL is stated above. Expansion of CILs into additional unserved counties would include the current 69 counties unserved by CIL services, as listed above, and would be counties that are adjacent to each CIL?s current service area.

2. Federal Regular Part B Funds Funding Priorities

Increases in Regular Part B funding will be given to the partners based upon the percentage that each partner currently receives in Part B funding. Partners are the SILC, IVRS, IDB, and the CILs. The percentage of the total new Part B funds that goes to the CIL partners will be divided equally among the CILs who currently receive Part B funds. During the course of the 3 year SPIL, the SILC and the DSUs may agree to re-allocate the Part B funds among the partners for a number of reasons, including but not limited to the following: a CIL is not going to utilize their Part B funds in any given year; state budget cuts that require the reduction of other funding sources to the partners which means re-allocation of the Regular Part B may be necessary to maintain operational budgets of any of the partners. In order for a CIL to receive Part B federal funds, they must be in compliance with the federal Rehabilitation Act Standards and Indicators and other applicable federal regulations, and be in compliance with their financial contracts with IVRS.

When there are CILs that have not been eligible to receive Part B funds, as determined by IVRS, and who at some point during this SPIL become eligible to receive Part B funds, the following procedure is followed:

- IVRS will determine if a CIL is eligible to have a contract with IVRS for Part B Funds.
- CILs are required to contract with IVRS for these funds, and these funds become available annually on October 1st.
- If a CIL has not been eligible to receive Part B funds, and at some point is determined by IVRS to be eligible to contract with IVRS for the funds, they will not be eligible for their share of these funds until the new federal fiscal year begins, which is on October 1st.
- All Part B funds will be divided equally among all CILs determined to be eligible by IVRS for these funds. If a CIL who previously was not eligible for Part B funds becomes eligible, this means the other already eligible CILs will have a reduction in the Part B funds they are currently receiving, for the next federal fiscal year, as all Part B funds are distributed equally among the eligible CILs.

When IVRS determines that a current CIL who contracts with IVRS is no longer eligible to contract with IVRS, those Part B funds that were going to that CIL are to be redistributed equally to the remaining CILs who are eligible to contract with IVRS.

If there are cuts to the Part B funds, all partners will receive a cut in their Part B funds in proportion to the amount of Part B funds they currently receive at the time of the cut.

3. State Funding Priorities

During the course of this three-year SPIL, the CILs will be working with the Governor's office and state legislators to obtain state funding for CILs.

New state funding received will be divided equally among all the CILs who are eligible to receive a contract with IVRS. If a new CIL is started during this 3 year SPIL, they would also get state funding if they are eligible to contract with IVRS at the start of the new state fiscal year, which is July 1st. In order for a CIL to receive state funds they must be in compliance with the federal Rehabilitation Act Standards and Indicators and other applicable federal regulations, and be in compliance with their financial contracts with IVRS, including Iowa State Accounting Standards.

When there are CILs that have not been eligible to receive State Funds, as determined by IVRS, and who at some point during this SPIL become eligible to receive State Funds, the following procedure is followed:

- IVRS will determine if a CIL is eligible to have a contract with IVRS for State Funds.
- CILs are required to contract with IVRS for these funds, and these funds become available annually on July 1st.
- If a CIL has not been eligible to receive State Funds, and at some point is determined by IVRS to be eligible to contract with IVRS for the funds, they will not be eligible for their share of these funds until the new state fiscal year begins, which is on July 1st.
- All state funds will be divided equally among all CILs determined to be eligible by IVRS for these funds. If a CIL who previously was not eligible for State Funds becomes eligible, this means the other already eligible CILs will have a reduction in the state funds they are currently receiving, for the next state fiscal year, as all state funds are distributed equally among the eligible CILs.

When IVRS determines that a current CIL who contracts with IVRS is no longer eligible to contract with IVRS, those State funds that were going to that CIL are to be redistributed equally to the remaining CILs who are eligible to contract with IVRS.

If there are cuts to the State Funds, all CILs receiving State Funds will share equally in the cut.

4. One Time Federal Part B and Part C Funding Priorities

One time federal funding is any federal funding that is not ongoing and that is a one-time funding appropriation with no continued funding in subsequent years.

In the event there is one time Part B federal independent living funding, it will be disbursed to all of the partners based upon the percentage that each partner currently receives of the Regular Part B funds. The partners are the SILC, DSUs, and CILs. In terms of the CILs, the total amount of one time Part B funding designated for CILs will be equally divided among the existing CILs who are eligible for that funding as determined by IVRS.

In the event that there is one-time Part C federal independent living funding, such as what happened with the American Recovery and Reinvestment Act (ARRA) funding, this funding will be disbursed equally among all of the current CILs, unless it will affect Regular Part C funding in the years after the one time funding goes away. If it will affect the amounts of Regular Part C in subsequent years, the one time Part C funding is to be disbursed to the current CILs based upon the current percentage of Regular Part C that each CIL receives.

5. CIL Closure Priority

If a federal Part C funded CIL relinquishes their grant(s) and closes their CIL, it is Iowa's intent to make it a first priority for RSA to conduct a grant competition for a new CIL in the same service area that was served by the CIL that closed. If the closed CIL received any federal Part B or state funds, the new CIL may apply for those funds through the contract process as established by Iowa Vocational Rehabilitation Services (IVRS) and as consistent with the Iowa State Plan for Independent Living (SPIL). If the RSA grant competition does not result in a new CIL, the federal Part C funds designated for that service area will be divided among the other existing Part C funded CILs based upon their current percentage of federal Part C funds. Any federal Part B funds or state funds that were designated for the former CIL will be divided equally among the remaining eligible CILs as determined through the contract process as established by Iowa Vocational Rehabilitation Services (IVRS) and as consistent with the Iowa State Plan for Independent Living (SPIL).

3.3 Section 723 States Only – 34 CFR 364.39

Not Applicable.

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.

Not Applicable.

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.

Not Applicable.

Section 4: Designated State Unit (DSU)

4.1 Administrative Support Services – 34 CFR 364.4; 34 CFR 364.22(b)

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.**

IVRS Accountants and an IL Resource Manager monitor contracts with CILs and the SILC for fiscal and programmatic oversight. The IL Resource Manager also manages the Iowa IL Network-related duties including participating on the SILC Council, participating in SILC committee work, and maintaining partnerships with other agencies. Since the IVRS IL Specialist's departure in the fall of 2012, SILS duties were assigned to the IL Resource Manager in addition to the other duties of the IL Resource Manager listed above. The IL Resource Manager position is half-time and is supported by a half-time clerical staff.

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

In the past, the Iowa Department for the Blind (IDB) had been the fiscal agent for the Part B funds given to the Iowa Statewide Independent Living Council (SILC). Starting in the 2010-2013 SPIL period, and thereafter, IVRS took over the fiscal agent role. There is an annual contract and work plan between IVRS and the Iowa SILC. IVRS continues to be the fiscal agent for the Part B and the state appropriation contracts for the CILs.

Section 5: Statewide Independent Living Council (SILC)

5.1 Resource plan – 34 CFR 364.21(i)

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.**

SILC Resource Plan

The SILC Resource Plan allocates federal funding from federal Part B funds, Title I Innovation and Expansion funds, and SSA Reimbursement funds for the operation of the SILC. The major areas where funding is allocated includes staff salary and benefits; SILC Council Member travel and teleconference expenses for SILC Council and committee meetings; training for staff and Council Members; travel for staff to national IL conferences; office expenses including rent, supplies, copy machine, phones, long distance and toll-free lines, and insurance; and funding for teleconference costs for collaborative activities between the CILs/SILC/DSUs, as well as collaboration with other groups. This allocation plan will fund the activities the SILC must engage in to meet the goal and objectives of this SPIL, consistent with the duties allowed under Section 705 of the Act and TAC 13-1 concerning the roles and responsibilities of the SILC.

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.**

There is an excellent system in place for checks and balances to ensure the fiscal accountability of the SILC. The Executive Director develops an annual itemized budget to outline the proper expenditure of funds and use of resources the SILC receives under the resource plan. This budget is reviewed by the SILC Executive Committee, and is then presented for approval by the entire SILC Council. Any modifications during the year that are needed are also approved by the full Council. The Executive Director keeps a detailed accounting of expenditures in the Quick Books software. The Executive Director balances the checkbook monthly, and then forwards the check register and bank statement to the SILC Council Treasurer to review and approve. At each of the quarterly SILC meetings, the Council is presented with a financial report of expenditures to date and remaining balances, and this is approved by the SILC Council. IVRS provides the SILC with a Capital Advance at the start of each federal fiscal year. The SILC ED pays bills and submits a monthly GAX form, along with all receipts and other documentation for each expense, to IVRS to review and approve. IVRS approves the request and reimburses the SILC for the expenditures.

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

The SILC Council has full authority over and responsibility for its budget resource plan. There are no conditions or requirements in the SILC Resource Plan that would compromise the independence of the SILC. The SILC Articles of Incorporation show the SILC as a 501(c)3 non-profit corporation, and its By-Laws ensure that its council has full authority over and responsibility for its budget (resource plan).

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

The CILs, SILC, and DSUs will rely, to the maximum extent possible, on the use of resources in existence during the period of implementation of the State Plan.

5.2 <u>Establishment and Placement – 34 CFR 364.21(a)</u>

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies.

– **Refer to the SPIL Instructions for more information about completing this section.**

The SILC was established to meet the requirements of the Rehabilitation Act, Title VII, Chapter 1 as amended in 1992. Given the fact that the SILC was created by federal legislation, a state law or governor's executive order was not used to establish a SILC in Iowa. The SILC operated as an autonomous, free standing entity whose members were appointed by the Governor. It developed bylaws consistent with mandates of Title VII and took on full partnership with the DSUs in developing, implementing, and monitoring the SPIL. In order to more clearly define its rather nebulous legal standing, the Iowa SILC incorporated and became a 501(c)3 in the fall of 2005. Although the SILC is now a non-profit corporation, the members continue to be appointed by the Iowa Governor, based upon all the requirements in the federal Rehabilitation Act. The Iowa SILC is an independent entity with respect to the DSUs and all other state agencies.

5.3 Appointment and Composition – 34 CFR 364.21(b) – (f)

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.**

An individual who wishes to be appointed to the SILC completes a Gubernatorial Appointment Resume form and sends it to the Governor's office. The SILC has the approval of the Governor's office to advertise for applicants via the SILC website and sending out statewide e-mails to alert people the SILC has openings. The Governor's staff work with the SILC to provide all candidate applications to the SILC, and a SILC committee reviews the applicants, and compiles a list of recommended candidates to the full Council. The full Council votes on whether to approve the committees recommended candidates, and these candidates are then forwarded to the Governor's office for appointment consideration. The Governor makes the final decision on who is appointed. The SILC Executive Director maintains active communication with the Governor's office regarding any vacancies on the SILC and the need for appointments.

5.4 Staffing – 34 CFR 364.21(j)

Describe how the following SILC staffing requirements will be met:

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

The Executive Director and the SILC Executive Committee have regular contact, including teleconferences, to conduct SILC business. The SILC Council evaluates the Executive Director annually. The SILC Executive Director evaluates SILC staff annually. All of this is consistent with the laws in the State of Iowa.

– **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.**

There are no staff assignments made that would create a conflict of interest.

Section 6: Service Provider Requirements

Describe how the following service provider requirements will be met:

6.1 Staffing – 34 CFR 364.23; 34 CFR 364.24; 34 CFR 364.31

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

Each CIL will maintain their established job descriptions that include requirements for education, personal experience, and skills for employees that provide IL services.

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

Each CIL will follow its established plan to identify and provide accommodations as needed and requested by the consumers served.

– **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.**

Each CIL will follow their established personnel policies that include provisions for staff development to employ and advance in employment persons with disabilities.

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

Each CIL will follow their established personnel policies that include provisions for staff development and affirmative action to employ and advance in employment persons with disabilities.

6.2 Fiscal Control and Fund Accounting – 34 CFR 364.34

– **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.**

Fiscal Control:

Iowa Vocational Rehabilitation Services (IVRS) uses a computerized accounting system maintained by the Department of Administrative Services and a staff of 14 accounting/budget staff, and 3 personnel/payroll staff to exercise fiscal control. Adequate separation of duties is maintained, and reviewed annually by the State Auditor. The Budget Team, comprised of the Administrator, Bureau Chiefs, Budget Analyst, Financial Supervisor, and Chief Financial Officer meets monthly to review agency financial status.

Fund Accounting:

IVRS uses a modified accrual basis of accounting, consistent with most other agencies of the State of Iowa. Modified accrual accounting is used to show the flow of financial assets of the funds and balances available for spending at year end.

Each CIL will follow its established fiscal policies and allocation plan as approved by the Department of Education, and will be responsible for monitoring and maintaining records of their expenditures to assure compliance with EDGAR fiscal and accounting requirements.

6.3 Recordkeeping, Access and Reporting – 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37

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

Record Keeping:

IVRS maintains supporting documentation of accounting transactions on-site for the current and one prior fiscal year. The State Records Center maintains supporting documentation, as required by state and federal regulation, for at least three (3) years after the final financial status report is filed for each fiscal year.

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

Reporting:
IVRS annually prepares a Generally Accepted Accounting Principles (GAAP) report. The GAAP report is presented to the Iowa Department of Administrative Services – State Accounting Enterprise, and to the State Auditor. IVRS also prepares numerous other reports required by the State of Iowa and the federal government. One such report, the federal RSA-2 report, ensures the proper disbursement and accounting of funds for Title VII, Part B of the Rehabilitation Act – Independent Living Services. IVRS is not involved in the disbursement of funds for Title VII, Part C, Centers for Independent Living.

Each CIL will be responsible for maintaining records as indicated in Section C, Item 2 of its corresponding 704 Report that assures all information gathering requirements for Consumer Service Records are being met.

Each CIL will be responsible for maintaining proper records for preparing and submitting its annual performance, financial, and other reports that the Secretary determines to be appropriate. The Iowa SILC ED and DSUs are available to provide technical assistance to CILs when requested.

Each CIL will comply with requests from the Commissioner, Comptroller General or their identified representative access to its consumer records, policies, financial records and other items deemed necessary to conduct audits, examinations and compliance reviews. The Iowa SILC ED and DSUs are available to provide technical assistance to CILs when requested.

– **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.**

Access:
IVRS accounting records are available for review, either at IVRS offices in Des Moines, or at the State of Iowa Records Center.

6.4 Eligibility – 34 CFR 364.40; 34 CFR 364.41

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

The DSUs and CILs maintain consumer service records documenting eligibility based on existing medical records or self reported information from the consumer, and maintain information and referral data so that consumers can be referred to other appropriate services and agencies. The DSUs and CILs provide services to any individual present in the state and who meets eligibility requirements, without regard to age, color, creed, gender, national origin, race, religion, sexual orientation, or type of disability.

– **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.**

Information about IL services and referral to other services and programs for individuals with significant disabilities is being provided according to individual consumer needs.

– **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.**

CILs determine eligibility for IL services in a manner that meets the requirements of 34 CFR 364.51 prior to provision of said services.

– **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.**

Eligibility for service provision is determined without regard to age, color, creed, gender, national origin, race, religion, sexual orientation, or type of significant disability.

– **Non-exclusion from receiving IL services of any individual who is present in the State and who is otherwise eligible for IL services, based on the imposition of any State or local residence requirement.**

Each CIL will assure that individuals with significant disabilities within its designated service area, that are otherwise eligible for services as identified in its consumer eligibility process, are determined eligible for and provided with IL services.

6.5 Independent Living Plans – 34 CFR 364.43(c)

– **Provision of IL services in accordance with an IL plan complying with Sec. 364.52 and mutually agreed upon by the individuals with significant disabilities and the appropriate service provider staff unless the individual signs a waiver stating that an IL plan is unnecessary.**

The DSUs and CILs maintain a consumer service record that includes either a written IL plan mutually agreed upon and signed by the consumer and CIL staff member indicating the plan goals or objectives and services to be provided, or a signed waiver stating that an IL plan is unnecessary. Each CIL will be responsible for following its identified method of assuring that consumers are provided the opportunity to develop or waive an Independent Living Plan and that their decision is indicated via signature. Furthermore, individuals choosing to develop an ILP will be assisted by their corresponding CIL staff in doing so.

6.6 Client Assistance Program (CAP) Information – 34 CFR 364.30

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

The DSUs and CILs provide information to every consumer, in written and other accessible formats, about the availability and purpose of the CAP program and how to contact this program.

Each CIL will be responsible for following its identified method of assuring that consumers are notified of the availability of the Iowa Client Assistance Program and its corresponding contact information in a format that is accessible to the consumer being served.

6.7 Protection, Use and Release of Personal Information – 34 CFR 364.56(a)

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

The DSUs and CILs maintain written policies to assure and safeguard the confidentiality of all

personal information, and release of information forms are used to comply with 34 CFR 364.56(a), and HIPPA.

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

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. 34 CFR 364.38

The SILC has a SILC/DSU Collaboration Committee comprised of representatives from the SILC, CILs, and DSUs. This committee will provide progress reports on the SPIL at each annual SILC Council Meeting. The SILC Executive Committee and SILC Executive Director will meet at least quarterly with the administrators of the two DSUs to discuss the progress toward meeting the SPIL goals and objectives. In addition, the SILC has written a Work Plan for their Part B funds, Title I Innovation and Expansion Funds, and SSA funds, which is submitted to IVRS annually, and the SILC ED provides quarterly progress reports on the Work Plan to IVRS.

The Iowa Department for the Blind (IDB) sends out a consumer satisfaction survey to all individuals when their cases are inactivated. The survey includes questions about timeliness of services, consumer involvement in service plans and decisions, satisfaction with services, and if the consumer feels better about his/her future as a result of services provided. The IDB receives about a 60% response rate, with respondents indicating a high degree of satisfaction.

Iowa Vocational Rehabilitation Services (IVRS) conducts a consumer satisfaction survey annually by sending out a survey to all cases at the time they are closed.

Please refer to the IL Network 3 Year Strategic Plan on pages 10-16 for the outcome measures that will be used to evaluate this SPIL.

Section 8: State-Imposed Requirements

Identify any State-imposed requirements contained in the provisions of this SPIL. Indicate N/A if not applicable. 34 CFR 364.20(h)

Not applicable.