

Mark-Up Copy

Changes are on Pages 25-28, under section 3.2 Expansion of Network – 34 CFR 364.25

State: ARKANSAS

**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 2008 – 2010

Effective Date: October 1, 2007

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PART I: Assurances

State of: Arkansas

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 Arkansas Rehabilitation Services – Ark. Dept. of Workforce Education (insert name of DSU). *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 Division of State Services for the Blind – Ark. Dept. of Health and Human Services (insert name of separate State agency). 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 Arkansas Independent Living Council (insert name of 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 is Robert P. Treviño (Name, title of DSU director) and James C. Hudson (Name, title of separate State agency director, if applicable). *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 With respect to the records that are required by *34 CFR 364.35*, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate. *34 CFR 364.36*

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.

Goal

Increase the ability of Arkansans with significant disabilities to lead productive and independent lives by improving the quality and collaborative nature of independent living (IL) services provided by Arkansas Rehabilitation Services (ARS), the Division of Services for the Blind (DSB), and the Centers for Independent Living (Centers).

Mission of the Centers for Independent Living

The mission of the Centers for Independent Living is to provide services, support and advocacy that enable people with disabilities to live as independently as possible within their community. The Centers strive to achieve full integration of persons with disabilities into the mainstream of society.

Mission of the Division of Services for the Blind

The Arkansas Division of Services for the Blind (DSB) is dedicated to the independence of Arkansans who are blind or severely visually impaired and is committed to the principle that these individuals have the right to make informed choices regarding where they live, where they work, how they participate in the community, and how they interact with others.

The DSB mission is to work in partnership with these Arkansans by assisting them in obtaining the information they need to make informed choices and by providing them with access to services that increase their opportunities to live as they choose.

Within the constraints of state and federal laws and based on available funds, DSB fulfills its mission through assisting Arkansans who are blind or severely visually impaired to live as independently as possible through the development of skills, accommodations, or adaptations that are necessary to perform all activities of daily living.

DSB offers independent living services under Chapter 1 of the Title VII of the Rehabilitation Act through its nine field offices throughout Arkansas. Information and referral; assessment; mobility; rehabilitation teaching; counseling; skill instruction; limited transportation; and adaptive aides and devices are provided. These services are available in all 75 counties. DSB partners with the Arkansas Independent Living Council (AILC) and the Centers for Independent Living (CILs) to provide independent living services.

Mission of Arkansas Rehabilitation Services

The ARS Mission statement is” To provide opportunities for individuals with disabilities to work and lead productive and independent lives.” The ARS strives to provide independent living services that enhance the ability of an eligible individual with a significant disability to live more independently and function within his/her family or community and, if appropriate, secure and maintain appropriate employment. The overall goal of ARS for the SILS program is to promote the integration and full inclusion of individuals with significant disabilities into the mainstream of American society.

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.

Objective 1 – Systems Change

Identify local and statewide barriers to IL and implement systems advocacy strategies involving the Centers in collaboration with the Arkansas Independent Living Council (AILC), other councils, task forces, and community organizations.

Activity 1 – Identify barriers

ARS, DSB, the Center and the AILC will collaborate to identify local and statewide barriers to independent living. The AILC will conduct Community Forums to identify barriers and document needs. Timelines – Ongoing.

Activity 2 – Develop strategies

ARS, DSB, the Centers and AILC will collaborate to develop strategies to address/remove identified barriers. Timelines – Completion April 2008.

Activity 3 – Implement strategies

ARS, DSB, and the Centers will implement agreed-upon strategies to address/remove identified barriers to independent living. Timelines – Completion November 2008.

Activity 4 – Evaluate effectiveness

ARS, DSB, the Centers and AILC will evaluate the effectiveness of the strategies used to address/remove identified barriers and reconfigure its strategies as necessary. Completion: Ongoing.

Activity 5 – Monitor legislation

The AILC will monitor federal, state, and local legislative efforts impacting those with disabilities. Timelines – Ongoing.

Activity 6 – Develop an Emergency Preparedness Plan

The AILC will develop an Emergency Preparedness Plan for Arkansans with disabilities. Timelines – Completion July 1, 2008.

Activity 7 – Collaborate with other SILC’s

The AILC will collaborate with other SILC's nationally in promoting the IL philosophy for all Americans with disabilities. Timelines – Ongoing.

Activity 8 – The AILC will meet quarterly with the Centers

The AILC shall facilitate quarterly meetings with the Centers regarding specific advocacy needs in their geographic regions. Timelines – Quarterly.

Objective 2 – Increase public awareness regarding Independent Living

ARS, DSB, the Centers and AILC will increase public awareness of the IL philosophy and availability of IL services.

Activity 1 – Train staff and Board

ARS and DSB will invite knowledgeable presenters from the University of Arkansas Center for the Utilization of Rehabilitation Resources for Education, Networking, Training and Service (CURRENTS), formerly Regional Continuing Education Center (RCEC), to train staff on the IL philosophy at an agency meeting. The staff and directors of the Centers will be used to train ARS, DSB and AILC on IL philosophy. Timelines – Completion by May 2008.

Activity 2 – Develop public relations activities

ARS and DSB public relations activities will increase public awareness of IL philosophy and services through inclusion in brochures and public service announcements. The state agencies will develop new brochures or include in existing brochures information about the IL philosophy and available IL services. The state agencies will utilize native languages in these efforts. Timelines – Ongoing.

Activity 3 – Inform transition students

The state agencies will invite a guest speaker to present information about the IL philosophy to high school students who are blind or severely visually impaired and are attending the DSB Jump Start transition program and the ARS Youth Leadership Forum. Timelines – Completion July 2008.

Activity 4 – Inform community and government

The AILC in collaboration with the Centers will inform families, businesses and government agencies of IL philosophy and availability of services. Timelines – Ongoing.

Activity 5 – Maintain website

The AILC will maintain a website. The website will be updated on an as-needed basis. Evaluate what linkages currently exist and their effectiveness and investigate other possible linkages. The website will include Centers' activities and calendars of events. Timelines – Ongoing.

Activity 6 – Create PowerPoint presentation

The AILC will create an updated Power Point presentation on IL philosophy and advocacy. This PowerPoint presentation will be used for awareness and education purposes. The presentation will be reviewed on an annual basis to ensure inclusion of current disability related issues and activities. Timelines – Completion March 1, 2008.

Activity 7 – Update resource library

The AILC will update the resource library with current information in appropriate formats and languages. Timelines – Completion March 1, 2008.

Objective 3 – Enhance ARS IL services

ARS will initiate activities to enhance IL services.

Activity 1 – Enhance consumer/counselor interaction

Enhancement of consumer/counselor interaction ARS will explore and identify strategies for a plan to enhance ARS IL services in collaboration with the AILC, the Centers, the SRC and ARS counselors. ARS will develop a customer satisfaction instrument. Completion by April 2008.

Activity 2 – Implementation of plan to enhance ARS IL services

ARS will implement the plan to improve IL services including counselor assignments and data tracking. Timeline – from April 2008 and ongoing in FY 2009-10.

Activity 3 – Update IL policies and procedures to reflect IL philosophy

ARS will form a workgroup to revise IL policy and procedures to more accurately reflect IL philosophy, and to comply with current law and regulations. Timeline – Completion September 30, 2008.

Activity 4 – Update ARIMIS system for IL

The ARIMIS data system will be updated to reflect the IL plan implemented above. Timeline – Completion September 30, 2008.

Activity 5 – Increase collaboration with the Centers

ARS will increase collaboration with the Centers through increased participation in meeting Center meetings. ARS will also include opportunities for the Centers to attend and provide IL training during ARS meetings and Conferences. Timelines – Ongoing.

Objective 4 – Enhance DSB IL services

DSB will initiate activities to enhance IL services.

Activity 1 – Increase public awareness

DSB will develop a public relations campaign to increase public awareness of DSB IL services. Options to be explored include, but are not limited to, public service announcements, brochures, speakers, the Arkansas Information Reading Services for the Blind, the DSB website, news releases, success stories, and use of the DHHS communications network. Timelines – Completion August 2008.

Activity 2 - Collaborate with the AILC and Centers

DSB will maintain cooperative relationships with the AILC and the Centers. DSB will use the Centers to build the capacity of DSB to provide and promote independent living services for

individuals who are blind or severely visually impaired. DSB will collaborate with the AILC and the Centers in expanding the knowledge and awareness of the independent living philosophy. Timelines – Ongoing.

Activity 3 - Evaluate effectiveness

DSB will evaluate the effectiveness of the CIL's that DSB has contracts with by reviewing monthly reports from the CIL's and making periodic visits. Timelines – Ongoing.

Objective 5 – Outreach to unserved and underserved populations and areas

ARS, DSB, the Centers will initiate activities to improve outreach to unserved and underserved populations and areas.

Activity 1 – The state agencies and Centers will include outreach in public relations efforts

ARS and DSB will include IL services in public relations efforts including outreach to unserved and underserved populations in brochures and public service announcements. The state agencies and the Centers will continue to include outreach through involvement in community activities. Brochures in native languages will be utilized. Public services announcements will include outreach. Timelines – Ongoing.

Activity 2 – Assessment of IL needs in underserved geographical areas of the state

The AILC will utilize surveys, forums and focus groups with stakeholders to assess the needs for IL services in the geographical areas that are not served by the Centers. ARS counselors and Center staff will distribute to individuals. AILC will develop forums or interest group discussions to assess the IL needs. Timelines – Ongoing.

Activity 3 – Coordination of services between state agencies and Centers

In the geographical areas that are located within the service area of a Center, the Centers will concentrate services more in the IL core service counseling and refer consumers to the state agencies more for purchase of IL items. In geographical areas that are not located within the service area of a Center, the state agencies will coordinate to provide more IL core service counseling. Training will be provided to state agency counselors to assist in the implementation of this activity. Timelines – Completion September 30, 2008.

Objective 6 – Collaboration

The entities will explore new and innovative areas for collaboration among ARS, DSB, the SILC and the Centers in provision of services and areas of mutual interest

Activity 1 – Collaboration among ARS, DSB, the AILC and the Centers

ARS, DSB, AILC and the Centers will strive to maintain cooperative relationships. Each entity will work with the others to build the capacity to provide and promote independent living services. The entities will collaborate in expanding the knowledge and awareness of the independent living philosophy within Arkansas. Timelines – Ongoing.

Activity 2 – Explore and find ways to collaborate in eliminating barriers to deinstitutionalization

ARS, DSB and the Centers will explore collaboration in eliminating barriers for deinstitutionalization and transition from nursing homes. Timelines – Ongoing.

Activity 3 – Explore and find ways to collaborate in Transition

ARS, DSB and Centers will explore collaboration in providing Transition services to high school students. Timelines – Ongoing.

Activity 4 – Explore and find ways to collaborate with Hot Springs Rehabilitation Center

ARS and the Centers will explore collaboration in Centers involvement in the orientation process for new students Hot Springs Rehabilitation Center. Timeline – Completion April 1, 2008.

Activity 5 – Consumer satisfaction surveys from Centers to AILC

The Centers will conduct consumer satisfaction surveys and provide them to the AILC. Timelines– Completion September 30, 2008.

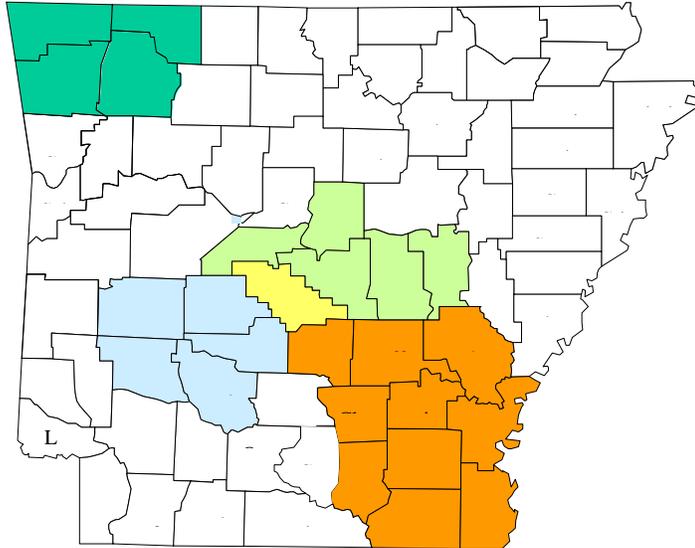
1.2B Describe the steps planned regarding outreach to populations in the State that are unserved or underserved by programs under title VII, including minority groups and urban and rural populations. This section of the SPIL must:

- Identify the populations to be designated for targeted outreach efforts;
- Identify the geographic areas (i.e., communities) in which the targeted populations reside;
and
- Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed.

Response

There are four CILs in Arkansas, Delta Resource Center, Mainstream, SAILS and SOURCES. The Centers provide the four core services in 25 of the 75 counties. SOURCES core service area covers four counties in northwest corner of Arkansas represented in dark green on the map below. Delta Resource Center's core service area serves 10 counties in southeast Arkansas in orange on the map. Mainstream's serves the counties in the light green area, SAILS' the light blue area and both Centers serve portions of Saline County in yellow. This leaves significant areas of the state that are not in a CIL service area. The counties not served include both urban and rural populations, and minorities. African Americans are located in these geographical areas, as well as an increasing Hispanic population. There is also a small Asian population within the state. The minority populations are located throughout the area. ARS and DSB provide IL services and outreach activities through their field offices for underserved populations including minorities in all 75 counties. As stated under Objective 5, the state agencies and Centers include outreach to these populations through public relations efforts in brochures and public service announcements and involvement in community activities. The state agencies also provide outreach through our collaboration with the Arkansas Workforce Centers One-Stops throughout the state. The state agencies actively and successfully recruit minority staff. The state agencies, Centers and AILC have developed lists of organizations that provide translators of native languages. The AILC is developing a resource library that includes native languages.

Centers for Independent Living Service Areas



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.

- Insert additional rows for the specific funding sources and amounts expected within the categories of Other Federal Funds and Non-Federal Funds.

Response

In the following tables the amounts are estimated. The amounts are based on expected funding for FY 07. Funding is under continuing resolution and is unknown for years two and three; therefore estimates are at the FY 07 levels. Funds for the AILC are actual amounts with a 3% increase for years two and three.

Year 1

| Sources | Approximate Funding Amounts and Uses | | | |
|--|---|-------------|------------------------|-----------------------|
| | SILC Resource Plan | IL Services | General CIL Operations | Other SPIL Activities |
| Title VII Funds | | | | |
| Chapter 1, Part B | | 36,177 | 265,300 | |
| Chapter 1, Part C | | | 784,880 | |
| Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective) | | | | |
| | | | | |
| Other Federal Funds | | | | |
| Sec. 101(a)(18) of the Act (Innovation and Expansion) | 154,850 | | | |
| Other | | | | |
| | | | | |
| Non-Federal Funds | | | | |
| State Funds | | 129,615 | 63,824 | |
| Other | | | | |

Year 2

| Sources | Approximate Funding Amounts and Uses | | | |
|--|---|-------------|------------------------|-----------------------|
| | SILC Resource Plan | IL Services | General CIL Operations | Other SPIL Activities |
| Title VII Funds | | | | |
| Chapter 1, Part B | | 36,177 | 265,300 | |
| Chapter 1, Part C | | | 784,880 | |
| Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective) | | | | |
| | | | | |
| Other Federal Funds | | | | |

| | | | | |
|---|---------|---------|--------|--|
| Sec. 101(a)(18) of the Act (Innovation and Expansion) | 159,702 | | | |
| Other | | | | |
| Non-Federal Funds | | | | |
| State Funds | | 129,615 | 63,824 | |
| Other | | | | |

Year 3

| Sources | Approximate Funding Amounts and Uses | | | |
|---|---|-------------|------------------------|-----------------------|
| | SILC Resource Plan | IL Services | General CIL Operations | Other SPIL Activities |
| Title VII Funds | | | | |
| Chapter 1, Part B | | 36,177 | 265,300 | |
| Chapter 1, Part C | | | 784,880 | |
| Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective) | | | | |
| Other Federal Funds | | | | |
| Sec. 101(a)(18) of the Act (Innovation and Expansion) | 165,005 | | | |
| Other | | | | |
| Non-Federal Funds | | | | |
| State Funds | | 129,615 | 63,824 | |
| Other | | | | |

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.

Response

The ARS and DSB Part B funds and matching funds are used to provide IL services directly to eligible individuals through ARS VR counselors and DSB IL Counselors. ARS objectives include increasing emphasis on IL core services and training for counselors in IL philosophy. A portion of ARS Part B funds supports the operation of the CIL programs. The Centers use Part C dollars to promote the IL philosophy, including a philosophy of consumer control, transition from nursing homes and the integration of people with significant disabilities into the mainstream of society. Funds from both Part B and Part C will be utilized in outreach activities.

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.

Response

Federal and state funds for the Centers and IL services are coordinated through the state plans and financial accounting procedures of ARS and DSB. Funding amounts for the AILC and Centers from the DSUs Part B and Section 110 funds are negotiated and determined by the DSUs, the AILC and the CIL programs. ARS’ Part B federal funds are mostly used to support the operation of the Centers with the balance and the state matching funds used to provide IL services. Innovation & Expansion funds from Section 110 are used to support the AILC. The following table gives the amounts. The amounts cover the first year of funding and are estimates since funding is under continuing resolution and difficult to estimate accurately for years two and three.

| Sources | Approximate Funding Amounts and Uses | | |
|----------------------------|--------------------------------------|-------------|--|
| | SILC Resource Plan | IL Services | General CIL Operations |
| Title VII Funds | | | |
| Chapter I, Part B | | 36,177 DSB | 62,339 Delta (ARS) 4,595 MSL (ARS) 93,183 Sources (ARS) 105,183 Spa (ARS) 265,300 subtotal |
| Chapter I, Part C | | | 157,964 Delta 310,988 MSL 157,964 Sources 157,964 Spa 784,880 subtotal |
| Chapter 2, Older Blind | | | |
| Other Federal Funds | | | |
| Sec. 101(a)(18) | 136,268 ARS 18,582 DSB | | |

| | | | |
|----------------------|---------|---|--|
| | | | |
| State Matching Funds | | 4,020 Pt B-DSB <u>125,595</u> Pt B-ARS 129,615 subtotal | 11,530 Delta DSB 16,975 MSL DSB 15,914 Spa DSB <u>19,405</u> MSL ARS 63,824 subtotal |
| Total | 154,850 | 165,792 | 1,114,004 |

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.

Response

No in-kind resources are provided.

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

Response

No additional information is appropriate.

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.

Response

The goals and objectives under Section 1 of the Arkansas SPIL are consistent and support the purposes stated in the Act:

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

The overall goal and mission of the SPIL is to increase the ability of Arkansans with significant disabilities to lead productive and independent lives by improving the quality and collaborative nature of independent living (IL) services provided by the IL entities in the state. Objective I in the SPIL is Systems Change to identify and eliminate barriers to IL and implement strategies to improve IL services. Objective 2 is to increase public awareness of IL philosophy and availability of services. Objectives 3 and 4 are to enhance IL services provision and promotion

of IL philosophy by the state agencies. Objective 5 involves activities to enhance outreach to unserved and underserved populations through assessment of needs in underserved geographical areas, public relations efforts, and coordination of services with ARS, DSB, and the Centers. Objective 6 is to explore new and innovative ways for collaboration among the IL entities. The SPIL provides financial assistance for providing, expanding, and improving the provision of independent living services; to develop and support statewide networks of centers for independent living; and for improving working relationships among independent living entities including ARS, DSB, AILC, the Centers and their partners.

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.

Response

The Centers were working partners with ARS, DSB and the AILC in development of the SPIL objectives. The SPIL objectives were developed on a collaborative basis with ARS, DSB, the AILC and the Centers. The priorities and objectives of the Centers' work plans were considered and incorporated into the SPIL objectives. These included emphasis on increasing capacity, enhancement of services, increasing collaboration with the IL entities, transition from nursing home, outreach to unserved areas of the state, and training in IL philosophy.

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 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.

Response

ARS, the Division of Services for the Blind and the AILC cooperate and coordinate with a variety of entities. The SRC, the Arkansas Workforce Investment Board and the Client Assistance Program are represented on the SILC. Cooperation takes place in carrying out activities of planning and coordinating services to people with disabilities to build capacity in communities and agencies, improve the quality and quantity of services and to avoid duplication of services. The AILC actively solicits a Board of Directors comprised of individuals representing a broad range of stakeholders and interested parties regarding IL services. Organizations represented include the Client Assistance Program, the Arkansas Department of Health and Human Services, the Disability Policy Consortium, the Governor's Commission on People with Disabilities, Arkansas People First, the Disability Coalition, a representative of local government, disability service providers, and consumers. Both ARS and DSB are represented on the AILC Board and attend meetings. A Center Director is on the Board as a representative of

the Centers. These members interact with their respective agencies and organizations, network and cooperate and coordinate with the ARS, DSB, the AILC and the Centers. The AILC will play a lead role in developing a coalition of interested stakeholders statewide that develop and monitor legislation impacting the lives of people with disabilities and their families. The AILC will actively collaborate with the Centers, the Arkansas Disability Coalition, Arkansas Disability Rights Center, ARS, DSB and other interested stakeholders throughout the state including Supported Employment providers and Mental Health and Developmental Disabilities agencies.

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.

Response

ARS, DSB and the SILC are aware of all IL and VR services within the state. Cooperative agreements are in place with the Department of Education, Special Education-Transition, and Workforce Education (Vocational Education). Cooperative agreements are being developed with DDS and Mental Health. Services are planned and coordinated to supplement and avoid duplication including the DSB Older Blind Program. All recipients of financial assistance under Chapter 1 and Chapter 2 adopt such fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for funds paid to the State under Chapter 1 and 2. Case record files are maintained that document and fully disclose disbursement for all services. The ARS and DSB comply with written policies concerning comparable benefits that require the counselor to determine and utilize benefits from any other agency that could be utilized in the consumer's individualized written IL plan.

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.

Response

Minutes of the Older Blind Advisory Committee are provided to the Director for the purpose of program evaluation and planning. These minutes, along with those of DSB Board Meetings, consumer satisfaction surveys and the annual evaluation by the independent contractor, Mississippi State Center on Blindness and Low Vision, lay the foundation for identifying and assessing the value of innovative practices.

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 |
| - IL skills training | x | | x |
| - Peer counseling | x | | x |
| - Individual and systems advocacy | x | | x |
| Counseling services, including psychological, psychotherapeutic, and related services | x | | |
| 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 | | 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 |
| 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 | | 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) |
|--|---------------------------------------|--|---|
| Education and training necessary for living in the community and participating in community activities | x | | x |
| Supported living | | | |
| Transportation, including referral and assistance for such transportation | x | | x |
| Physical rehabilitation | x | | |
| Therapeutic treatment | x | | |
| Provision of needed prostheses and other appliances and devices | x | | |
| 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 |
| 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 | | 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.

Response

The ARS, DSB, the Centers and with support from the AILC have a priority for outreach to unserved and underserved populations within the state of minority populations including African Americans, Hispanics and Asians. The Centers have a priority in transition from nursing home

services. The IL entities are seeking to collaborate and explore new and innovative approaches to provide services more effectively in the geographical areas of the state that are not in the service area of a CIL through coordination of services between the Centers and the state agencies.

2.1C If the State allows service providers to charge consumers for the cost of services or to consider the ability of individual consumers to pay for the cost of IL services, specify the types of IL services for which costs may be charged and for which a financial need test may be applied, and describe how the State will ensure that:

- Any consideration of financial need is applied uniformly so that all individuals who are eligible for IL services are treated equally; and
- Written policies and consumer documentation required by 34 CFR 364.59(d) will be kept by the service provider.

Indicate N/A if not applicable.

Response

DSB and the Centers do not consider a financial needs test in the provision of IL services. ARS follows a financial needs policy outlined in its Economic Need policy. Financial need is considered not as a condition for furnishing a service, but is utilized to determine if the individual has adequate financial resources to contribute towards the cost of their independent living services. The policy is in written form in the ARS Policy and Procedures Manual to facilitate uniformity in application. A financial needs test is applied to IL services with the exception of assessment of rehabilitation needs, including rehabilitation technology, except for those services other than of a diagnostic nature which are provided under extended evaluation; and counseling, guidance and referral services. Case records files are maintained by ARS on each individual provided IL services.

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

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.

Response

The ARS and DSB do not provide any IL services through grants or contracts. ARS and DSB services are provided directly or purchased individually.

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.

Response

The ARS and DSB provide grants to the CIL programs for operations. All CIL staff and operations of the Centers are separate and independent from the ARS and DSB. All case service records of individuals provided IL services by the Centers are housed in the Centers. The

Centers are located independently from the ARS and DSB' offices.

Section 3: Design for the Statewide Network of Centers

3.1 Existing Network – 34 CFR 364.25

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.

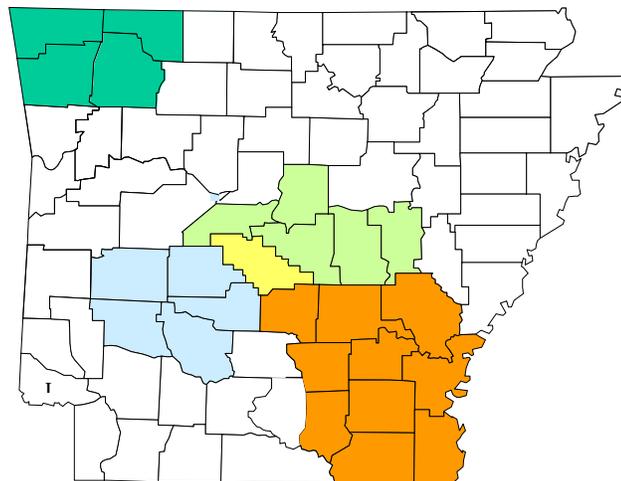
Response

Arkansas has four Part C funded Centers for Independent Living: Mainstream (Little Rock), SOURCES (Fayetteville), Delta (Pine Bluff), and SAILS (Hot Springs). There are no non-Part C funded centers in Arkansas. The four centers provide the core services in 25 of the state's 75 counties.

Mainstream, SAILS, and Delta cover areas that are contiguous, covering a large area in the central to southeast region of the state. Mainstream's core service area covers Pulaski, Lonoke, Perry, Faulkner, and Prairie and part of Saline counties in central Arkansas represented on the map below in light green. Delta Resource Center's covers Jefferson, Arkansas, Grant, Cleveland, Desha, Drew, Bradley, Ashley, Chicot, and Lincoln counties in Southeast Arkansas represented in orange. SAILS' covers Garland, Hot Spring, Clark, Pike, and Montgomery, and part of Saline counties in Southwest central Arkansas represented in orange with Saline in yellow shared with Mainstream.

SOURCES covers the four counties in Northwest Arkansas. SOURCES area includes Washington, Benton, Madison, and Carroll counties represented in dark green.

**Centers for Independent Living
Service Areas**



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).

Response

~~The expansion of Independent Living service offerings will follow a specific formula. Information provided via Centers for Independent Living, community forums and grassroots organizations establishes the need for an additional Center for Independent Living. The feasibility determination process will consist of the following components: (1) Compilation of data supporting the expansion; (2) formation of committee charged with investigating the capacity of the community under consideration to support a new Center and the impact on existing Centers with contiguous service areas; (3) development of community action plan to address deficiencies if expansion is not recommended; (4) establishment of satellite center if expansion is recommended under mentorship of existing Center geographically nearest new service area; and (5) the satellite Center becomes independent upon development of funds necessary to fully support autonomy.~~

~~The first priority area in expansion of the IL network into unserved areas of the state is in Northeastern Arkansas, with the second priority in the Southwestern area, followed by the North central counties. At this time, the SILS partners are exploring the possibility of opening a satellite CIL office in Northeast Arkansas in the city of Jonesboro. Northeast Arkansas has a major population concentration in Jonesboro and the surrounding area. Initially, two counties are being considered Craighead, which includes Jonesboro and Mississippi, which borders Craighead on the west and the Mississippi Delta on the east. A significant concentration of individuals with disabilities resides in these counties according to the Maximus SSA Beneficiary Distribution Website. The Mississippi Delta is an economically depressed area and includes a significant number of individuals with disabilities and minority population. A business plan will be developed and funding sources in the community explored. If the satellite can be implemented and sufficient funding becomes available, future growth will involve expansion into a stand-alone CIL serving several counties.~~

Distribution of the ARRA Part C Funds among Existing part C Centers

The Arkansas DSU and SILC have determined that the ARRA Part C funds should be distributed to the four existing part C centers in Arkansas to meet the needs of underserved areas in their service areas, using the same proportion that is used in distributing the regular fiscal year Part C funds among those centers. The Arkansas DSU and SILC believe that the proportional distribution of the ARRA part C funds reflects the population of the respective service areas.

The following table illustrates the proposed distribution of ARRA Part C funds.

Proposed Distribution of Part C ARRA Funds in Arkansas

| | <u>2010 Total</u> |
|----------------------|--------------------------|
| Mainstream .3931 | <u>218,314.47</u> |
| <u>SOURCES .2023</u> | <u>112,350.51</u> |
| <u>SAILS .2023</u> | <u>112,350.51</u> |
| <u>Delta .2023</u> | <u>112,350.51</u> |
| | <u>555,366.00</u> |

Unserved and Underserved Areas

When expansion of the IL network is not feasible, or recommended, the DSU and SILC in coordination with the existing Centers may:

a) Identify the unserved and underserved populations in the existing IL network catchment areas. Unserved and underserved populations may include, but are not limited to groups or populations of individuals with significant disabilities who:

- 1) Have physical, cognitive or sensory impairments
- 2) Are members of racial or ethnic minority groups in the catchment areas
- 3) Live in rural area
- 4) Are elderly; or
- 5) Have been identified by the IL networks, the DSU, or the SILC as unserved or underserved within a Center's project area.

- Sources for Community Independent Living Services in northwest Arkansas plans to conduct outreach sessions with the Latino and Marshallese populations, the elderly, and rural Counties of Madison and Carroll.
- SAILS' identified unserved and underserved populations are the Latino population in Garland County and Clark County and rural population in Saline, Hot Spring, Montgomery and Pike Counties. SAILS' plans include connecting with the Workforce centers and/or other agencies that already have established locations in the rural counties of our coverage area and developing a plan to improve services in the aforementioned rural areas.
- Mainstream will use the funds as a mechanism to reach an ever-increasing Hispanic population and rural African-American elderly in central Arkansas and the development of educational programs with other community stakeholders that have access to the diverse population.
- Delta Resource Center's service area is predominantly rural and represents 56% of the total number of persons with disabilities living in this part of the state. Only 3 of the counties are close to Pine Bluff which is considered the only metropolitan area. Transportation is a huge need for persons in this service area and most times is unavailable, so home visits and community networks are the most effective ways to reach those in need. Delta's approach to increasing and enhancing IL services for underserved areas includes promotion and education of CIL services

and establishing networks with other service organizations and building relationships with community organizations.

b) Develop a plan to reach the unserved or underserved populations (Outreach)

c) Determine need of service

d) Implement the requested services

e) Document the efforts

Expansion of Arkansas's Statewide Network

If, after RSA has provided Part C funds to existing centers at the level of funding the centers received the previous year and a COLA, there exists Part C funds in the amount of \$150,000.00:

1. The first priority area for expansion of the IL network into unserved and underserved areas of the state is in Northeast Arkansas, serving the counties of Craighead, Mississippi, Poinsett, Cross and Crittenden. When the State's allotment is sufficient to fund a new Part C center in this region, the center will serve Craighead, Mississippi, Poinsett, Cross and Crittenden Counties with Craighead and Mississippi Counties being the most populated. Even if Part C funds are not available at this time, the SILS partners are exploring the possibility of opening a satellite CIL office in Northeast Arkansas in the city of Jonesboro using non-Part C funds. Northeast Arkansas has a major population concentration in Jonesboro and the surrounding area. Initially, two counties are being considered -- Craighead County, which includes the city of Jonesboro, and Mississippi County, which borders Craighead on the west and the Mississippi Delta on the east. A significant concentration of individuals with disabilities resides in these counties according to the Maximus SSA Beneficiary Distribution Website. The Mississippi Delta is an economically depressed area and includes a significant number of individuals with disabilities and minority population. A business plan will be developed and funding sources in the community explored. If the satellite can be implemented and sufficient funding becomes available, future growth will involve expansion into a stand-alone CIL serving several counties. The counties served by the center would depend on the amount of funding available, initially serving Craighead and Mississippi Counties, and expanding into Poinsett, Cross and Crittenden counties as adequate funding becomes available.
2. The second priority is in the Southwest area, serving the counties of Miller, Lafayette, Hempstead and Little River. This center will serve Miller, Lafayette, Hempstead and Little River Counties, with Miller County, which includes the city of Texarkana, being the most populated county.
3. The third priority is in the North central counties, serving the counties of White, Cleburne, Independence, Jackson, and Woodruff. This center will serve White, Cleburne, Independence, Jackson, and Woodruff Counties, with White County, which includes the city of Searcy, being the most populated.

The expansion of Independent Living service offerings will follow a specific process.

Information provided via Centers for Independent Living, community forums and grassroots organizations establish the need for an additional Center for Independent Living. The feasibility determination process will consist of the following components: (1) compilation of data supporting the expansion; (2) formation of a committee charged with investigating the capacity of the community under consideration to support a new Center and the impact on existing Centers with contiguous service areas; (3) development of a community action plan to address deficiencies if expansion is recommended; (4) establishment of satellite center if expansion is recommended under mentorship of existing Center geographically nearest the new service area; and (5) the satellite Center becomes independent upon development of funds necessary to fully support autonomy. Note that steps 4 and 5 apply only to centers established with state or Part B funds since Part C has its own requirements for establishment of a new center.

If the amount of excess regular fiscal year Part C funds beyond the COLA is insufficient for the Commissioner of RSA to hold a competition to establish a new Part C center, the DSU and SILC will distribute any excess regular Part C funds proportionately among the four existing Part C centers.

3.3 Section 723 States Only – 34 CFR 364.39

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.

Response

N/A

3.3B Describe how the State policies, practices and procedures governing the awarding of grants to centers and the oversight of these centers are consistent with 34 CFR 366.37 and 366.38.

Response

N/A

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.

Response

The ARS and DSB receive, account for and disburse funds received for the SILS program based on the State Plan for Independent Living. All administrative support for the ARS and DSB IL programs is provided through employees of the ARS and DSB. All staff and employees of the

AILC and the Centers are employed exclusively by them and are not state employees. An ARS Liaison and a Program Evaluation Specialist provide the AILC with technical assistance.

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

Response

The staffs of ARS and DSB administer the state agencies' IL programs. ARS and DSB staffs are available for technical assistance to the AILC and Centers. Technical assistance and communication take place on an ongoing basis and are encouraged in order to support the overall state IL program.

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.

Response

Funding for the resource plan of the AILC is provided by ARS and DSB from Section 110 Innovation and Expansion funds. ARS provides 88% and DSB 12% of the funds for the resource plan of the AILC. The amounts of the AILC resource plan projected for FY '08, '09 and '10 are \$154,850, \$159,702, and \$165,005 respectively. The AILC, ARS and DSB develop the resource plan collaboratively. The plan provides all resources for the AILC including staff and personnel. All funds are provided by the DSUs. There are no other public or private funds included in the resource plan.

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.

Response

The AILC has approved financial policies and procedures that ensure all funds are expended appropriately and with integrity. These policies are executed with authority by the Executive Director and with oversight from the AILC Council. The Financial records are reviewed monthly by the Executive Director and the AILC Council and reported to all appropriate entities. Funding for the AILC yearly resource plan is outlined in a written grant agreement with ARS and DSB. The expenditures under the resource plan are monitored periodically by both ARS and DSB, and audited annually through independent audit, which is provided to both DSUs. There is a written contract with the AILC regarding funding. The contract requires written records,

access and records retention. The contract requires the AILC to comply with applicable audit and reporting requirements outlined in State and Federal Accounting Laws. The AILC agrees to allow DSU staff or other designees to conduct program monitoring and evaluation during normal working hours. Termination may be immediate if at any time, the DSU concludes that AILC has not fully performed any/all the responsibilities under this agreement, an emergency situation arises or funding is not available. This does not affect any legal rights the DSU has in the recovery process related to damages if the AILC has not performed according to the terms of the agreement.

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

Response

The AILC is an independent 501(c)(3) non-profit corporation with a governor appointed Board of Directors. The AILC is placed administratively outside the government structure. The AILC is physically located autonomously from any state government buildings. A clause is being developed to add to the contract to insure that the DSU will not include conditions or requirements in the AILC resource plan that would compromise the independence of the SILC.

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

Response

The ARS and DSB provide funding for the AILC resource plan through a written grant agreement. The amounts are agreed upon within the State Plan for Independent Living and ratified by the AILC Board of Directors and the Directors of the DSUs. Spending is monitored through the finance sections of both ARS and DSB.

5.2 Establishment and Placement – 34 CFR 364.21(a)

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.

Response

The SILC obtained Articles of Incorporation on November 21, 1994 and gained status as an independent 501(c)(3) non-profit corporation on February 2, 1995. The Governor appoints the Board of Directors. The SILC is located outside the state government structure.

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.

Response

The AILC tracks appointments and expirations of terms of Board members. A database is being developed to assist in tracking and to monitor composition requirements. The AILC will create a nominating committee to monitor and nominate candidates for Board membership. The governor appoints members to the AILC Board of Directors. The governor's office notifies the AILC of appointments when they are completed. Prospective members are recommended to the governor through collaborative effort by the AILC and Directors of the ARS and DSB. ARS, DSB, the AILC and the governor collaborate to insure that the members meet AILC composition and qualifications requirements. The AILC selects a chairperson from among the voting membership of the Council. Membership terms of service are for 3 years, for no more than 2 consecutive terms. A member appointed to fill a vacancy occurring prior to the expiration of the term for another member, is appointed for the remainder of such term. Terms are appointed on a staggered basis. Vacancies are filled by appointment of the governor.

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.
- 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.

Response

- The AILC maintains written policy and procedures in its AILC Personnel Policies in conformance with state and federal law.
- The DSUs are developing a policy that there shall be no conflict of interest for any DSU staff assigned to the AILC for administrative support.

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.
- 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.
- 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.

- 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.

Response

- ARS, DSB and the Centers maintain personnel policies that encourage hiring staff and utilizing individuals that are knowledgeable and specialists in VR and IL services. Counselors are CRC certified. The ARS Successful Employment through Assistive Technology (SEAT) and Increasing Capabilities Access Network (ICAN) programs have specialists in assessment and provision of assistive technology and rehabilitation technology that work with IL consumers. DSB has rehabilitation teachers and mobility instructors that are specialists in IL. The Centers have policy and procedures that cover personnel, financial, service provision and office procedures. The job description includes requirements under the section, Acceptable Training and Experience, that include a Bachelors Degree in rehabilitation or other related field is preferred, two or more years in community organizing and training, personal disability or experience with the disabled population, and knowledge of disability laws, policies and regulations. The Centers are developing uniform written policy that will specifically cover inclusion of personnel who are specialists in the development and provision of IL services and in the development and support of centers.
- The DSUs and the CILs seek to employ individuals with skills in alternative modes of communication and native languages. The ARS assistive technology project has staff that is trained and utilizes vendors certified in alternative communication devices. Each entity has staff or contracts with interpreters of Spanish and other languages, sign language interpreters for the deaf and hard of hearing, and Braille.
- The DSUs and CILs are developing written policy requiring and making available continuing education, training and staff development for all classes of positions involved in providing IL services. ARS is developing training in IL philosophy for all counselors and has scheduled IL philosophy training during the Fall Conference October 4-5, 2007. ILRU on-line training will also be provided to the DSUs and CIL staff.
- The DSUs have written policy in compliance with section 503 of the act. Uniform written policy is being developed on affirmative action with all the CILs.

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.

Response

The ARS and DSB have adopted internal accounting controls complying with applicable EDGAR fiscal and accounting requirements and as required by generally accepted accounting

procedures and requirements of the state of Arkansas. The internal controls of the agency are subject to an annual audit by the Arkansas Legislative Audit under the requirements of the Single Audit Act and the Compliance Supplement. The AILC and Centers have internal accounting controls in compliance with state and federal law and are audited annually by independent audit. The Centers maintain their own financial records in house and retain this information using an accounting software system. The Centers use an outside accounting service to prepare payroll for the organizations and to conduct a monthly external bank statement audits. The Centers also has an independent auditor conduct an annual audit. The Centers maintain written policy under Financial Policy and Procedures. The Centers will develop uniform policy and procedures for use in all Centers.

6.3 Record-Keeping, 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.
- Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate
- Access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

Response

The DSUs and Centers maintain fiscal records, personnel records and consumer files in accordance with the Education Department of General Administrative Regulations. All record and files are available for review by authorized personnel. All appropriate reports are submitted to the Secretary or Commissioner as required.

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.
- 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.
- 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.
- 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.
- 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.

Response

The ARS and DSB maintain policy and procedure in compliance with federal and state law regarding eligibility, information and referral, non-discrimination and no residency requirement other than presence in the state. Ability to seek information, eligibility determination,

information and referral, non-discrimination, and non-exclusion from IL services based on residency are included in written policy and procedure. The individual Centers have policy and procedures on these issues. The Centers will develop uniform policy and procedures for use in all Centers on (1) ability of any individual to seek information about IL services under these programs and to request referral to other services and programs; (2) 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; (3) application of eligibility requirements without discrimination; and, (4) 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.

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.

Response

ARS and DSB IL plans are developed for each individual in compliance with federal and state law. The DSUs are developing more comprehensive monitoring procedures for the Centers that will include IL case review. The Centers' IL Plans are developed or waived at application and included in a Packet that also outlines the grievance procedure and CAP information including contact numbers. The Centers will develop uniform policy and procedure regarding provision of IL services for use in all Centers. The Centers' Independent Living Plans are developed with the consumer with emphasis on consumer control. The Centers promote consumer involvement and offer individuals every opportunity to be active participants in the development of their IL Plans.

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.

Response

The ARS and DSB provide each consumer with CAP information at application and make it available throughout the IL process. The Centers have written policy requiring notification of clients and applicants of the Client Assistance Program (CAP). The Centers' use a CAP informational pamphlet that is given to consumers at intake and information provided about the Disability Rights Center, the Protection and Advocacy group in Arkansas. The CAP information is made available in accessible formats.

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.

Response

The ARS and DSB have written policy in compliance with federal and state law. The Centers' have written policy to not release any personal information on consumers or employees without their written authorization. This is to ensure confidentiality in accordance with all federal laws and regulations. The CIL principle of confidentiality is maintained for all programs, departments, functions and activities in accordance with policies and procedures of the organization.

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

Response

The AILC, ARS and DSB are responsible for monitoring, reviewing, and evaluating the implementation of the State Plan for Independent Living (SPIL). The AILC will utilize the following evaluation components to ensure compliance with the requirements of Section 7. These include:

1. The SILC will elect a committee to monitor, review and evaluate progress on implementation and meeting the objectives and activities of the SPIL.
2. The SILC will address as part of its quarterly business funding and whether the resource plan timelines or funding are adequate and need adjustments in order to meet current and future needs.
3. Submitting the annual 704 report to Rehabilitation Services Administration in conjunction with ARS and DSB. The AILC will complete the information for Part 1 of the report and submit it to the DSUs. ARS will include the information in the full report that they submit to RSA not more than 120 days after the end of the federal fiscal year. The AILC will monitor and review the 704 report quarterly.
4. Publishing an Annual Report. This report will review the AILC's activities, successes, and problems over the previous fiscal year. It will be made available to the AILC's mailing list, through request by e-mail, and on the AILC's website.
5. AILC Review. The AILC will review the progress of the SPIL quarterly. Goals and objectives will be evaluated for quantitative and qualitative results.
6. Consumer compilations. All written comments from consumers received by the AILC regarding IL services shall be kept on record and considered in the development of the 704 report. The AILC newsletter will continue to encourage consumers to send comments in to the office. Comments sent to the newsletter may be published in the newsletter.

7. The AILC will compile all customer satisfaction surveys from the Centers, ARS and DSB and publish the results annually. These will be assessed for effectiveness and to identify areas of need.
8. ARS staff will attend quarterly SILC meetings. Attending these meetings allow ARS to stay abreast of consumer satisfaction, statewide initiatives to expand IL services and to gather information on IL activities.
9. SILC staff will attend quarterly ARS meetings. This will allow the SILC to learn about ARS programs and services and help with the monitoring of the SPIL.
10. ARS staff will monitor quarterly financial and program reports submitted by the AILC.
11. ARS staff will monitor quarterly financial and program reports submitted by the Centers.
12. ARS staff will attend RSA reviews or monitoring activities of the Centers.
13. ARS staff will review annual federal reports of the AILC and the Centers.
14. The Centers use customer satisfaction questionnaires with consumers. DSB utilizes a customer satisfaction survey for IL. ARS is developing a customer satisfaction instrument as part of Objective 3 under Section 1.2.

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)

Response

ARS follows a financial needs policy outlined in its Economic Need policy. Financial need is considered not as a condition for furnishing a service, but is utilized to determine if the individual has adequate financial resources to contribute towards the cost of their independent living services. ARS and DSB follow a comparable benefits policy to determine if any IL benefit or service is available from other programs or health insurance that can be utilized in the individual's IL plan. Comparable benefits are not a condition of eligibility.