

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

TABLE OF CONTENTS

Part I: Assurances

Section 1: Legal Basis and Certifications

Section 2: SPIL Development

Section 3: Independent Living Services

Section 4: Eligibility

Section 5: Staffing

Section 6: Fiscal Control and Fund Accounting

Section 7: Record-Keeping, Access and Reporting

Section 8: Protection, Use and Release of Personal Information

Section 9: Signatures

Part II: Narrative

Section 1: Goals, Objectives and Activities

Section 2: Scope, Extent and Arrangements of Services

Section 3: Design for the Statewide Network of Centers

Section 4: Designated State Unit (DSU)

Section 5: Statewide Independent Living Council (SILC)

Section 6: Service Provider Requirements

Section 7: Evaluation

Section 8: State-Imposed Requirements (If applicable)

PART I: Assurances

State of: Maryland

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 the Maryland State Department of Education, Division of Rehabilitation Services (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 N/A (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 the Maryland Statewide 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 plan are consistent with State law. *34 CFR 76.104(a)(4) and (8)*
- 1.7 The representative(s) of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has/have 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/are: Suzanne R. Page (Name of DSU director) and N/A (Name of separate State agency director). *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:
- a) The provision of State independent living services;
 - b) The development and support of a statewide network of centers for independent living; and
 - c) 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 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:
- a) 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);
 - b) 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
 - c) 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:
 - a) The availability of the CAP authorized by section 112 of the Act;
 - b) The purposes of the services provided under the CAP; and
 - c) 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:
 - 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 who apply for or receive IL services under title VII of the Act, 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. *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:
- a) The amount and disposition by the recipient of that financial assistance;
 - b) The total cost of the project or undertaking in connection with which the financial assistance is given or used;
 - c) The amount of that portion of the cost of the project or undertaking supplied by other sources;
 - d) Compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
 - e) 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 assurance in sections 1 – 8 of this SPIL, the undersigned hereby affirm that the State of Maryland is in compliance and will remain in compliance with the aforementioned assurances during the three-year period of this SPIL.

The effective date of this SPIL is:

SIGNATURE OF SILC CHAIRPERSON	DATE
-------------------------------	------

David C. Sharp; Signed xx/xx/2013
NAME OF SILC CHAIRPERSON

SIGNATURE OF DSU DIRECTOR	DATE
---------------------------	------

Suzanne R. Page, Assistant Superintendent in Rehabilitation Services;
Signed xx/xx/2013
NAME AND TITLE OF DSU DIRECTOR

N/A

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

N/A

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

State of: Maryland

Part II: Narrative

Section 1: Goals, Objectives and Activities

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

1.1A 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.

Vision:

Mission: The Maryland Statewide Independent Living Council (MSILC) promotes, supports and enhances opportunities for Marylanders with disabilities to maximize choices to independently live, work and play.

Goal 1: The Maryland IL system operates with a strong infrastructure.

Goal description: This goal builds on the progress the Maryland Statewide Independent Living Council has made over the past several years. The MSILC has made strides in terms of membership, meetings, organizational structure and statutory responsibilities with the leadership of the MSILC Executive Committee. Of the CILs with grants from the DSU, all but two have met or exceeded all standards for Centers providing services to Marylanders with significant disabilities. However, there are continuing challenges with consistency in the Centers for Independent Living, with two having been designated by the DSU as at high risk related to fiscal and program management and board role and responsibility. One of the new Centers faces significant challenges. This Goal and its activities seek to enhance the consistency of services offered by all Maryland CILs. Resources for this goal will be in the MSILC and CILs budgets.

Goal 2: People with disabilities receive the information and services they need from the IL system.

Goal Description. Consistent with a philosophy of continuous improvement, the IL service delivery system in Maryland will focus on supporting new and existing CILs and expanding service delivery to more individuals with disabilities, including un-served and underserved populations. The focus will be on serving individuals in institutions seeking supports to live in the community, and individuals from Hispanic communities with Spanish as their primary language. Public information and outreach tools and strategies should be enhanced. Resources for this goal will be in the MSILC and CILs budgets, and from State IL funds, and from ILOB funding (Objective 4).

Goal 3: The IL Partners promote systems change to maximize the independence, productivity, and community integration of people with disabilities.

Goal Description. In order to make significant strides in independent living where necessary, addressing systemic issues is critical. The IL Partners intend to carry this out in a targeted and structured manner focusing on housing for individuals with disabilities. As the Maryland IL system is further stabilized through Goals 1 and 2, it is expected that IL partners will be able to enhance participation and advocacy with various entities to address systemic barriers to housing as it impacts Independent Living. Resources for this goal will be in the MSILC and CILs budgets.

1.2 Objectives

1.2A Objectives and Timeframes

Goal 1: The Maryland IL system operates with a strong infrastructure.

Throughout goals, objectives and activities, and as noted in the mission statement above, Maryland IL Partners includes the Maryland Statewide Independent Living Council, the Maryland Division of Rehabilitation Services, and the network of Centers for Independent Living in Maryland.

Objective #1: Maryland CILs will have the essential skills and knowledge to strengthen operational infrastructure and provide the four core services.

Activity 1: The MSILC will arrange, facilitate and offer statewide CIL staff and board training in program, nonprofit, and financial management and data collection in each year, through annual activities from October 1, 2013 through September 2016.

Measures:

1. **All CILs are in compliance with the IRS, Maryland Secretary of State and Office of Assessment and Taxation and are in good standing with RSA and DORS, as appropriate;**
2. **Evaluations of trainings will confirm whether learning objectives were met;**
3. **Summary of statewide trainings of CIL staff will confirm topics. Progress will be described and documented annually as part of an IL Partners meeting (see Objective 3, Activity 3). Annually October 2013 – September 2016**

Activity 2: IL Partners will provide information, guidance, and peer support to new and existing CIL grantees in the development and

administration of Maryland's CILs, to include sharing information, mentoring, identifying and sharing resources), annually from October 1, 2013 through September 2016.

Measure: Maryland Association of Centers for Independent Living (MACIL) will provide, at least annually, a summary of formal and informal support provided to new and existing CILs for review of the IL Partners at an IL Partners meeting (see Objective 3, Activity 3). October 2013 – September 2016

Activity 3: IL Partners will develop a document that outlines how to best support a CIL that is at risk and how to address the issues around closure of a Center, by June 30, 2014 for submission to IL Partners for review and approval.

Measure: The CIL Support document will be completed and approved by the IL Partners by September 30, 2014.

Objective #2: Quality Assurance tools will be available for the Maryland Centers for Independent Living.

Activity 1: IL Partners will develop a sample common/model satisfaction survey and procedures through regular and ongoing meetings, by September 30, 2015.

Measure: Sample common/model satisfaction survey and procedures will be available to CILs by September 30, 2015.

Objective #3: The Maryland Statewide Independent Living Council (MSILC) will function effectively and efficiently, consistent with the Rehabilitation Act, as amended, and the Federal Independent Living Regulations.

Activity 1: The MSILC will establish a transition process to full MSILC autonomy, by September 30, 2016.

Measure: The MSILC will be operating with full autonomy, through direct grant from the DSU/DORS, by September 30, 2016.

Activity 2: The MSILC shall enhance a method for the MSILC's review of progress on established SPIL goals and objectives, during the first year of this SPIL, by September 30, 2014.

Measure: Enhanced written protocol including timeframes for review of progress on goals and objectives as well as items

such as source of information needed , method to gather information and, organization responsible for gathering and filing information,. This progress will be discussed and updated at IL Partners and full council meetings in each year through September 30,2014 .

Activity 3: The MSILC will arrange, facilitate and fund an annual IL Partner retreat to review progress on SPIL goals and objectives, identify barriers, develop solutions and promote the vision of IL through September 30, 2016.

Measure: An agenda, list of attendees and written proceedings of the meeting will confirm conduct of an IL Partner retreat annually through 2016. The following information will be included within the proceedings: (1) Evaluation of the status of the SPIL, particularly achieving goals and objectives; and (2) establishment of timelines for the next year.

Goal 2: People with disabilities receive the information and services they need from the IL system.

Objective #1: People with disabilities will have the information they need to make informed choices and to access supports and services to participate fully in all aspects of society.

Activity 1: The MSILC shall design and implement an accessible website for the Maryland Statewide Independent Living Council that provides quality information to the public, by September 30, 2014.

Measure: Meeting minutes will confirm website design efforts. MSILC website will be operational and accessible by September 30, 2014.

Activity 2: MSILC to exhibit at statewide conference/s that benefit Marylanders with disabilities.

Measure: Lists of names for the MSILC to contact to relay information on MSILC, ,the CILs and the MSILC Needs Assessment.

Objective #2: The IL Partners will have an understanding of demographic trends including numbers of people with disabilities participating in IL service delivery system, racial/ethnic diversity and underserved populations.

Activity 1: The MSILC will explore options to compile statewide data from the 704 reports submitted annually to the federal Rehabilitation Services Administration by the Centers for Independent Living, by March 31 of each SPIL year.

Measure: 704 Data will be utilized by MSILC to monitor the effectiveness of the SPIL annually during an IL Partners Meeting (see Goal 1, Objective 3, Activity 3). Annually from March 2014 through March 2016.

Activity 2: The MSILC and IL Partners will compile and review data from the 704 reports, statewide data on living in nursing facilities and other relevant reports, annually by March 31 of each SPIL year.

Measure: Report of trends will be presented and discussed at the annual IL Partner Retreat. Annually from March 2014 through March 2016.

Objective #3: IL Partners will have an understanding of consumer needs .

Activity 1: IL Partners will assess the needs of individuals with disabilities periodically using the 2012 MSILC Needs Assessment as a baseline, by September 30, 2015.

Measure: Findings of future needs assessments will be compared to the MSILC 2012 baseline report, and presented at an IL Partners meeting. By September 30, 2015.

Objective #4: Increase from [last year's performance #] to [a figure that equals last year's total # plus 3%] number of eligible older blind individuals served under the Chapter 2, Individuals who are Older Blind, referred to in Maryland as the Independent Living program for Older Blind (ILOB), by providing comprehensive independent living skills training and services. Outreach, training and peer support will provide seniors with the tools they need to successfully manage vision loss."

Activity 1: The ILOB program will collaborate with and provide outreach to advocacy groups, CRP's, Dept. of Aging, healthcare providers and other service agencies to ensure that we serve the targeted underserved populations.

Measure: Quarterly reports will reflect at least 20 presentations to community providers, nursing home staff,

healthcare providers, and service agencies annually through September 30, 2016.

Activity 2: Provide intensive group training to eligible older blind individuals in a format that will allow for individualized instruction as well as peer support networking opportunities.

Measure: Quarterly reports will reflect at least four (4) full-day Life Enhancement Workshops throughout the state designed to bring the training opportunities available through the Chapter 2 Program into rural communities with particular attention to under-served localities. 2014 - 2016

Activity 3: Provide rehabilitation teaching and/or therapy intervention to increase the individuals' functional independence through environmental modifications, adaptive equipment, and self-care training. In addition, make referrals to appropriate professional / community resources when necessary.

Measure: The number of individuals served through the ILOB program will show an increase by September 30, 2016. The annual 7OB report will show evidence of the increase, by September 30, 2016.

Goal 3: The IL Partners promote systems change to maximize the independence, productivity, and community integration of people with disabilities.

Objective #1: Increase access to affordable, integrated, accessible housing for people with disabilities.

Activity 1: Each Maryland CIL will participate in one housing plan in their area per year from 2014 - 2016.

Measures: Documentation will be developed annually and will detail the involvement of each CIL on a housing plan. Documentation will be presented at an IL Partners meeting annually.

Activity 2: The MSILC and CILs will educate legislators on barriers to housing and other community integration during annual IL Awareness Day.

Measures: Agenda and materials provided will identify and document IL Awareness Day, annually during FY 2014 - 2016.

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;**

Based on public input, census data/population information and consumer feedback, Maryland has identified the following populations for targeted outreach:

1. Individuals with Hispanic background for whom Spanish is their first language.
2. People in Institutions (such as Nursing Homes, State Residential Centers and Rehabilitation Facilities) – This continues to be a focus for all Centers.

- **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.**

Geographic areas in which targeted populations reside: Individuals can be found in each CIL catchment area who use Spanish as a first language, as well as, individuals in nursing homes needing assistance and supports to transition to the community. are found throughout Maryland, in each CIL catchment area.

How needs will be addressed:

- a) We will identify and collaborate with organizations that are comprised of and run by individuals identified in target populations. Working together we can achieve more success in outreach into the underserved targeted populations.
- b) When targeting these populations, we will modify our materials in a manner that best conveys our message of independent living for all.
- c) We will address needs of individuals with disabilities in nursing facilities through local CIL initiatives and through collaboration with Aging and Disability Resource Centers and other relevant public and private entities.

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

Amounts included in Financial Tables are Estimates and depend on amount of state and federal authorizations.

Year 1

Approximate Funding Amounts and Uses				
Source	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				
Chapter 1, Part B	*\$89,000	\$30,000	*\$203,302	
Chapter 1, Part C			*\$1,206,556	
Chapter 2, Individuals Who are Older Blind		*\$575,558		
Other Federal Funds				
Sec. 101(a)(18) of the Act (Innovation and Expansion)	*\$15,000			
Other- Program Income			30,000	
ARRA Pt. C			246,678	
Non-Federal Funds				
State Funds		*\$447,840 (\$65,000 is match for Chapter 2, IOB)	*379,097	
Other				

Approximate Funding Amounts and Uses, Year 1:

Title VII Funds, Chapter 1, Part B: SILC Resource Plan \$89,000. General CIL Operations \$233,302.

Title VII Funds, Chapter 1, Part C: General CIL Operations \$1,206,556.

Title VII Funds, Chapter 2, Individuals Who are Older Blind: IL Services \$575,558.

Other Federal Funds, Sec. 101(a)(18) of the Act (Innovation & Expansion): SILC Resource Plan \$15,000.

ARRA Part C:\$246,678.

Non-Federal Funds, State Funds: IL Services \$447,840

(\$65,000 is match for Chapter 2, IOB). General CIL Operations \$379,097.

Program Income from VR Basic Support \$30,000

Year 2

Approximate Funding Amounts and Uses				
Source	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				
Chapter 1, Part B	*\$89,000	\$30,000	*\$203,302	
Chapter 1, Part C			*\$1,206,556	
Chapter 2, Individuals Who are Older Blind		*\$575,558		
Other Federal Funds				

Source	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Sec. 101(a)(18) of the Act (Innovation and Expansion)	*\$15,000			
Other Program Income			\$30,000	
ARRA Pt. C			233,678	
Non-Federal Funds				
State Funds		*\$447,840 (\$65,000 is match for Chapter 2, IOB)	*\$379,097	
Other				

Approximate Funding Amounts and Uses, Year 2:

Title VII Funds, Chapter 1, Part B: SILC Resource Plan \$89,000. General CIL Operations \$233,302.

Title VII Funds, Chapter 1, Part C: General CIL Operations \$1,206,556.

Title VII Funds, Chapter 2, Individuals Who are Older Blind: IL Services \$575,558.

Other Federal Funds, Sec. 101(a)(18) of the Act (Innovation & Expansion): SILC Resource Plan \$15,000.

ARRA Part C: \$233,678

Non-Federal Funds, State Funds: IL Services \$447,840

(\$65,000 is match for Chapter 2, IOB). General CIL Operations \$379,097.

Program Income from VR Basic Support \$30,000

Year 3

Approximate Funding Amounts and Uses				
Source	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				
Chapter 1, Part B	*\$89,000	\$30,000	*\$203,302	
Chapter 1, Part C			*\$1,206,556	
Chapter 2, Individuals Who are Older Blind		*\$575,558		
Other Federal Funds				
Sec. 101(a)(18) of the Act (Innovation and Expansion)	*\$15,000			
Other Program Income			\$30,000	
ARRA Pt. C			0	
Non-Federal Funds				
State Funds		*\$447,840 (\$65,000 is match for Chapter 2, IOB)	*379,097	
Other				

Approximate Funding Amounts and Uses, Year 3:

Title VII Funds, Chapter 1, Part B: SILC Resource Plan \$89,000. General CIL Operations \$233,302.

Title VII Funds, Chapter 1, Part C: General CIL Operations \$1,206,556.
Title VII Funds, Chapter 2, Individuals Who are Older Blind: IL Services \$575,558.
Other Federal Funds, Sec. 101(a)(18) of the Act (Innovation & Expansion): SILC Resource Plan \$15,000.
ARRA Part C: \$0
Non-Federal Funds, State Funds: IL Services \$447,840
(\$65,000 is match for Chapter 2, IOB). General CIL Operations \$379,097.
Program Income from VR Basic Support \$30,000

1.3B Financial Plan Narratives

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

Part B funds will be used to support:

- The activities of the SILC (Goals 1, 2 and 3)
- Provision of independent living services by CILs (Goals 1, 2 and 3) consistent with Section 1.3B(2).

ARRA Part C funds indicated above are from each CIL's related form 524 for applicable years of the SPIL. Part C funds, including ARRA Part C will be used to support:

- Provision of independent living services by CILs (Goals 1, 2 and 3), including provision of services to underserved populations and areas.

Chapter 2 (Older Blind) – These will be used to provide services as outlined in Goal 2, Objective 4.

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 DSU (DORS) provides \$104,000 annually in grant funding to support the Maryland Statewide Independent Living Council which includes the salary of an Executive Director. This funding also includes training, meeting and conference expenses, outreach materials, reasonable accommodations for meetings (e.g., interpreters and CART services), and reimbursement to members for meeting-related expenses. This is consistent with Goals 1, 2 and 3.

DORS provides grant funding of \$612,399 annually for IL general operations, core and other independent living services to certain Centers. This includes outreach and services to underserved populations and geographic areas. This is consistent with Goal 2 and Goal 3.

DORS provides state grant funding for Independent Living Assistive Technology services. Total for IL AT: \$382,840. This is consistent with Goal 2.

On an annual basis, the DSU (DORS) provides \$30,000 for the IL program in Maryland. This is coordinated through grants management and business support by the DORS Director of Business Support, the Staff Specialist for Grants, and the DORS Director of the Office of Program & Community Support.

Grants management includes at least annual review of the provision of IL and IL AT services as applicable in terms of adherence to the Memorandum of Understanding program and fiscal responsibilities and assurances. In the event there is very serious programmatic or fiscal mismanagement by the grantee, the DSU (DORS) has the obligation and responsibility to advise the grantee of the steps necessary to correct the mismanagement and to evaluate corrective actions by the grantee. In the event the mismanagement is extremely egregious and/or sustained beyond a reasonable correction period, the DSU (DORS) has the responsibility and obligation to terminate or discontinue funding to the grantee. The following options for the Part B/ State IL funds shall be considered by the DSU (DORS) in consultation with the MSILC:

Part B Funds: (1) the DSU (DORS) may explore the possibility of another CIL providing the IL services; (2) Part B funds may be distributed to other CILs that already have Part B grants; adjustments may be made in state funding so that Centers are held harmless; (3) a new CIL will be established if and when the existing CIL has been terminated and is no longer receiving Part C funds from the US Department of Education. Establishment of a new CIL shall be in accordance with Section 3 of the SPIL.

State funding for ILAT Services: (1) the DSU (DORS) may provide the IL AT services directly through agency staff; (2) the DSU (DORS) may explore the possibility of another CIL providing the IL AT services or acting as fiscal agent for the grantee; (3) the DSU (DORS) may consider a competitive process to identify a private non-profit entity in the disability field to provide the ILAT services through one-year grants.

Federal Part C funds and ARRA Part C funds provided by RSA directly to Centers for Independent Living in the amount of \$246,678(SPIL Year 1), \$233,678 (SPIL Year 2), and \$0 (SPIL Year 3) will be used for general operations and to provide services to underserved populations and areas. This is consistent with SPIL Section 3.2A.

ILOB funds in the amount of \$640,558 will be provided to conduct outreach to underserved individuals and to provide comprehensive services, consistent with Goal 2, Objective 4.

**Note: State General Funds are approved annually by the Governor and the Maryland General Assembly. In addition, to meet state budget requirements the funding level may be reduced at the governor's discretion in a given fiscal year. Therefore the level of funding may vary from year to year. Federal funding may also vary depending on current budget cycle and applicable federal mandates.*

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.

DORS provides meeting space, and technical assistance to the MSILC.

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

N/A

1.4 Compatibility with Title VII and the CIL Work plans – 34 CFR 364.42(c) and (e)

1.4A Title VII. 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 purpose of Chapter 1 of Title VII of the Act (Chapter 1) is to promote a philosophy of independent living, which includes 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 significant disabilities; and the integration and full inclusion of individuals with significant disabilities into the mainstream of American society

As stated in the Mission, Maryland's State Plan for Independent Living is to maximize independence and productivity of people with disabilities and to promote their full integration into the community. Through this plan, the partners have promoted goals and objectives that truly manifest that mission.

1.4B CIL Work Plans. 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.

All CIL directors participated in SPIL planning meetings to identify statewide needs, goals and strategies, and confirmed that SPIL goals, objectives and activities are consistent with their work plans. The SPIL and CIL work plans

reflect the major barriers individuals with disabilities experience in trying to live independently in Maryland.

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:

- a) The SILS program, the SILC, and centers; and**
- b) The DSU, 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 determined to be appropriate by the SILC.**

Steps necessary to maximize the coordination among the DSU, SILC and CILs include:

Consistent with all SPIL Goals, the Maryland IL Partners (DORS, MSILC and CIL Executive Directors) will meet on a quarterly basis. The MSILC will share information about progress in meeting SPIL objectives. Other matters of common interest will be discussed.

The MSILC includes a CIL report at MSILC meetings in which the Council member who represents the CILs will report on CIL activities and highlights from Maryland Association of CILs (MACIL) meetings. In turn, the representative will keep MACIL members updated on the activities of the MSILC through distribution of relevant information through emails and updates at MACIL meetings.

MSILC members and IL Partners are represented on councils that address the independent living needs of specific disability groups. These organizations include, but are not limited to:

- Maryland Association of Centers for Independent Living (CIL Directors)
- Maryland State Rehabilitation Council
- Maryland Disability Law Center
- Maryland Developmental Disabilities Council
- Maryland Department of Disabilities
- Maryland Access Point
- Brain Injury Association of Maryland
- Maryland TBI Advisory Board
- Medicaid Matters: Maryland

- Washington Metropolitan Area Transit Authority (WMATA)
Accessibility Committee

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.

The MSILC Executive Director and members are in ongoing communication with other disability advocacy and service organizations in Maryland. Frequent communication among IL colleagues and other disability service providers assist the MSILC in locating and remedying unnecessary duplication of services. Some of the communication takes place on a formal level with emails, newsletters and website updates, as well as informal with discussions between MSILC members and disability rights colleagues at events of common interest.

The IL Partners will maintain an awareness of agencies and organizations providing services to individuals with disabilities in Maryland and their mission and scope of services. IL Partners will seek to complement services of other agencies and fill gaps in services and will avoid duplication of services available through other federal, state and local entities including special education, career education, developmental disabilities services, public health, mental health, housing, transportation, veterans' services and Social Security programs.

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 DSU (DORS) administers the Independent Living Older Blind (ILOB) program through the Office for Blindness and Vision Services. While traditionally services have focused on in-home skills and orientation and mobility to enable older individuals with limited vision to maintain ability to accomplish activities or daily living, more recently services have included assessment and provision of an array of assistive technology devices to promote independence.

DORS also provides ILOB services through grants to community providers based on a competitive bid process and establishment of an MOU, which includes services to be provided and reporting requirements.

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(1): 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	X	X	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	X
Mobility training	X	X	X
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	X	X	X
Personal assistance services, including attendant care and the training of personnel providing such services	X	X	X

	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/grants)
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services		X	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	X
Education and training necessary for living in the community and participating in community activities	X	X	X
Supported living			
Transportation, including referral and assistance for such transportation	X	X	X
Physical rehabilitation	X	X	X
Therapeutic treatment	X	X	X
Provision of needed prostheses and other appliances and devices	X	X	X
Individual and group social and recreational services	X	X	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	X	X
Services for children with significant disabilities		X	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	X	X
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	X	X	X
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	X	X	X
Other necessary services not inconsistent with the Act	X	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.

DORS will provide State IL Services (SILS) focusing on assistive and access technology through state-funded grants.

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:

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

IL AT services are provided through DORS state-funded grants to CILs and may be provided through DORS state-funded grants to other service providers in certain circumstances. CILs/service providers have policies and procedures in place regarding determination of financial need and participation in the cost of services for consumers with the ability to contribute, as well as identification of in-kind resources.

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

2.2A If the DSU will provide any of these IL services through grants or contractual arrangements with third parties, describe such arrangements.

The DSU (DORS) provides IL services through annual grants to Centers for Independent Living, and may provide grants to other service providers for ILAT services only. Memoranda of Understanding completed each year describe IL and/or ILAT services to be provided and quarterly and annual program and financial reporting requirements. DORS conducts annual reviews to assure compliance and identify best practices.

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.

The DSU (DORS) will ensure that the determination of an individual's eligibility for services from the Centers shall be determined by qualified staff of the Center through explicit statements to that effect in the annual MOUs. Periodic reviews of CILs will confirm establishment of eligibility by CIL staff.

Section 3: Design for the Statewide Network of Centers

3.1 Existing Network – 34 CFR 364.25

3.1A 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.

Maryland currently has a network of eight CILs.

1. **Independence Now, Inc.**, Prince George's County. Funding: Part C, Part B, and State.
2. **Independence Now, Inc.**, Montgomery County. Funding: Part C, Part B, and State.
3. **Resources for Independence**; Garrett County, Allegany County and Washington County. Funding: Part C, Part B, and State.
4. **Eastern Shore Center for Independent Living**; Dorchester County, Talbot County, Caroline County, Cecil County, Kent County, Queen Anne's County, Somerset County, Wicomico County, and Worcester County. Funding: Part C.
5. **Southern Maryland Center for Independent Living** (Previously known as Southern Maryland Center for LIFE); Calvert County, Charles County and St. Mary's County. Funding: Part C, Part B, and State.
6. **The Freedom Center**; Frederick County and Carroll County. Funding: Part C, Part B and State.
7. **Independent Marylanders Achieving Growth through Empowerment (The IMAGE Center)**; Baltimore City, Baltimore County and Harford County. Funding: Part C and State.
8. **Accessible Resources for Independence**; Anne Arundel County and Howard County. Funding: Part C.

3.2 Expansion of Network – 34 CFR 364.25

3.2A 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).

It is the intention of the Maryland IL Partners that Independence Now, Inc. Prince George's County and Independence Now, Inc. Montgomery County be combined into one Center for Independent Living. This would not require funding and would result in savings in terms of administration, data collection and documentation.

Establishment of a federal and/or state funded CIL in Maryland shall be consistent with the Maryland State Plan for Independent Living.

Following are underserved areas and populations within the existing eight CIL catchment areas:

It is recommended that two Centers for Independent Living be established for the Eastern Shore, one to serve the Upper Shore (Cecil, Kent, Queen Anne's Caroline and Talbot Counties), and one to serve the Lower Shore (Wicomico, Worcester, Dorchester and Somerset Counties).

When RSA informs MSILC and DORS that additional Title VII, Part C funds are available in a given FFY or if the MSILC, CILs and DORS are successful in acquiring additional funds for Independent Living they will be allocated in the following manner:

1. Maryland IL Partners consider \$300,000 to be a base level of funding for Maryland centers. This funding can be a combination of state and federal funding.
2. Until all centers are at the base level of funding any new funds received will be divided among the CILs who are not yet at the base level of funding in the following way: half will be divided equally among the centers and half will be divided based on population. In this scenario centers who are at the base level of funding will not receive any of the new funds.
3. Should all centers be at the base level of funding and we receive \$250,000 or more, the first priority will be to expand ESCIL to two centers.
4. Should all centers be at the base level of funding and we receive less than \$250,000 it will be divided among the CILs in the following way: half will be divided equally among the centers and half will be divided based on population.

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.

N/A

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

N/A

Section 4: 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.

DORS provides meeting space, grant coordination and support to the Centers for Independent Living with which DORS has grants. DORS Business Support Services provides financial and technical assistance in planning and budget development.

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

N/A

Section 5: 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.

The resource plan outlined below illustrates federal funds provided through Title VII-B, Ch. 1, (\$ 89,000), allocated for support of the Maryland Statewide Independent Living Council.

PROJECTED RESOURCE ALLOCATION FOR EACH FFY 2014 - 2016

Federal Title VII B\$ 89,000

The above projected funding is anticipated to remain constant throughout the next three years.

Note: State general funds are subject to approval of the Governor and the Maryland General Assembly each fiscal year. Federal funding may also vary depending on current budget cycle and applicable federal mandates.

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

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

The Executive Director of the MSILC, Inc. provides quarterly reports of expenditures, consistent with the budget included in the Memorandum of Understanding developed by DORS for support of the MSILC. This assures proper expenditures of funds consistent with DORS policy, state regulation and the SPIL. DORS Office of Business Support Services provides consultation regarding purchases and other financial matters.

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

No conditions or requirements are placed on the MSILC resource plan that may compromise the independence of the MSILC.

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

The Executive Director, in collaboration with the Executive Committee of the MSILC, projects and tracks expenditures to assure compliance with the SPIL objectives and current budget. In the current economic conditions, the MSILC cannot assume or rely on additional funding for independent living in Maryland.

5.2 Establishment and Placement – 34 CFR 364.21(a)

5.2A Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies.

The Maryland Statewide Independent Living Council was established by Executive Order 01.01.1993.24 of the Governor of Maryland. The Council is provided support through a grant from DORS. The Council has office space at an off-site location, separate from the DSU, and functions and carries out many

activities in community locations. The Executive Director is assigned only duties related to the MSILC.

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

5.3A Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b).

The Maryland SILC is currently in compliance with statutory composition, voting member and term limit requirements.

The MSILC Infrastructure Committee will periodically review the current membership to ensure that all composition requirements are met and that all appointments are current. The MSILC shall, at least annually, release a call for applicants to determine interest in membership on the MSILC. The Infrastructure Committee shall categorize and cross reference applicants in relation to the present MSILC composition to determine in what area the MSILC needs to strengthen its representation. Interviews are conducted by the Committee. The full Council then votes to forward the individual's name and biographical information to the Governor's Office for consideration for appointment.

5.4 Staffing – 34 CFR 364.21(j)

5.4A 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 Committee of the MSILC hires and assesses the job performance of the MSILC Executive Director.

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

The MSILC Executive Director is employed by and assigned duties only related to the Maryland Statewide Independent Living Council.

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.**

The DSU (DORS) hires qualified staff to provide ILOB services and provides ongoing training. Each CIL hires qualified staff and provides on-site and external training to staff members as well. In the event DORS provides a state-funded grant to a non-CIL service provider for IL AT services, the RFP process and MOU will assure that personnel providing the IL AT services are specialists in their field.

- **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.**

The DSU (DORS) provides information to all consumers in requested alternate formats as a matter of policy; interpreter and translation services are available through approved providers/state contract, respectively.

All CILs/ILAT service providers make available information to consumers in the format most comfortable to the individual, and utilize interpreter and translation services as needed. These services are prominently advertised on outreach materials and are expressed to consumers as they request services.

- **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.**

Comprehensive staff development is coordinated by the Staff Specialist, Human Resource Development and provided to all DSU (DORS) staff focusing on impact of disability and assistive technology.

CIL staff receive both formal and on-the-job training, although no two CILs provide identical training to staff members. All CILs and MSILC staff receive training, at minimum, in the following general areas: independent living

philosophy and consumer control, the ADA, Fair Housing Act and other relevant laws, ethics, confidentiality and record keeping. Beyond the basics, CILs choose trainings based on need, availability and financial resources. In the event the DSU (DORS) provides a grant to a non-CIL service provider for IL AT services, the MOU will include the requirement of appropriate staff development.

- **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.**

The DSU (DORS) makes every effort to hire and promote individuals with disabilities as a matter of policy.

CILs are required to employ a majority of staff who are individuals with disabilities. CILs in Maryland meet this requirement.

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.**

The DSU (DORS) uses the State of Maryland's Financial Management Information System (FMIS) to track encumbrances and expenditures of IL funds. The DSU follows both federal and State policy concerning procurement of goods and services.

MOUs related to DORS grants for IL services and IL AT services include (1) requirement to abide by state of Maryland procurement policies, (2) reporting of purchases for DORS review and (3) requirement to abide by the federal Education General Administrative Regulations (EDGAR).

Grants management includes at least annual review of the provision of IL and IL AT services as applicable in terms of adherence to the Memorandum of Understanding program and fiscal responsibilities and assurances. In the event there is very serious programmatic or fiscal mismanagement by the grantee, the DSU (DORS) has the obligation and responsibility to advise the grantee of the steps necessary to correct the mismanagement and to evaluate corrective actions by the grantee. In the event the mismanagement is extremely egregious and/or sustained beyond a reasonable correction period, the DSU (DORS) has the responsibility and obligation to terminate or

discontinue funding to the grantee. The following options for the Part B/ State IL funds shall be considered by the DSU (DORS) in consultation with the MSILC:

Part B Funds: (1) the DSU (DORS) may explore the possibility of another CIL providing the IL services; (2) Part B funds may be distributed to other CILs that already have Part B grants; adjustments may be made in state funding so that Centers are held harmless; (3) a new CIL will be established if and when the existing CIL has been terminated and is no longer receiving Part C funds from the US Department of Education. Establishment of a new CIL shall be in accordance with Section 3 of the SPIL.

State funding for ILAT Services: (1) the DSU (DORS) may provide the IL AT services directly through agency staff; (2) the DSU (DORS) may explore the possibility of another CIL providing the IL AT services or acting as fiscal agent for the grantee; (3) the DSU (DORS) may consider a competitive process to identify a private non-profit entity in the disability field to provide the ILAT services through one-year grants.

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.**

The DSU (DORS) and CILs maintain all required financial records consistent with 34 CFR 364.35. In the event DORS grants state funds to a non-CIL service provider for ILAT services, DORS would assure maintenance of required records as established in the MOU. DORS reviews service provider financial records during annual reviews.

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

The DSU (DORS) files the required 425 reports and, with the MSILC, the annual 704 and 704B reports as required by law.

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

The DSU (DORS) undergoes an annual single state audit, a legislative audit every three years, RSA monitoring, and a periodic review by the Maryland State Department of Education Audit Branch.

DORS grantees are required, as stated in the grant MOU, to have an annual financial report or annual audit conducted, and submit the report and any resulting management letter(s) to DORS.

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.**

CILs provide Independent Living Services to individuals with disabilities as defined by the Rehabilitation Act, as amended, and as specified in grant memoranda of understanding with DORS. In the event DORS grants state funds for ILAT services to a non-CIL service provider, the MOU will stipulate determination of eligibility as defined in 34 CFR 364.4(b).

- **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 DSU (DORS) services, including ILOB services is available to the public through the Division's comprehensive website www.dors.state.md.us and through an array of public information available at DORS offices statewide and through request of DORS staff at over 20 locations throughout the state.

Most CILs have websites that provide information about IL services and also give links to other programs and services. The SILC will be developing an accessible website consistent with Goal 2, Objective 1. Additionally, service providers promote the programs through brochures, fact sheets and other informational handouts. Enhancement of public information and website access is included in activities related to Goal 2. In the event DORS grants state funds to a non-CIL service provider for ILAT services, DORS will assure through the MOU that the service provider is able to provide information about IL resources and make appropriate referrals.

- **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.**

Eligibility for IL services is described in CIL policies and procedures and is consistent with requirements in the Rehabilitation Act, as amended. In the event DORS grants state funds to a non-CIL service provider for IL AT services, the MOU between the DSU (DORS) and the grantee spells out eligibility requirements.

- **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.**

Policy of the Division of Rehabilitation Services, RSM I, Section 300 affirms that DORS does not discriminate in provision of services, including ILOB services.

Each CIL has a non-discrimination policy as well as a statement to that effect on the application for services. In the event DORS grants state funds to a non-CIL service provider for ILAT services, the MOU shall assure that the service provider has appropriate non-discrimination policies and practices in place.

- **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.**

Policy of the Division of Rehabilitation Services, RSM I, Section 300 affirms that DORS provides services to individuals who are present in the state, including those eligible for ILOB.

Each CIL has a policy that it will provide services to qualified individuals who are present in the state, consistent with Federal law and regulation. In the event DORS grants state funds to a non-CIL service provider for ILAT services, the MOU shall assure that the service provider offers services to eligible individuals who are present in the state.

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 DSU (DORS) works with individuals eligible for ILOB to develop a comprehensive written Independent Living Plan, unless the individual signs a waiver stating the plan is unnecessary, per DORS Policy (RSM II, Section 605, Independent Living Plan; and COMAR 13A.11.03.05.

Each CIL works with eligible individuals to determine a course of action that either includes an Independent Living Plan or a Waiver of such plan. The consumer service record includes documentation of services provided, with or without an Independent Living Plan. In the event DORS grants state funds

to a non-CIL service provider, the MOU shall include the requirement to develop an IL plan consistent with Section 364.52 unless the eligible individual waives the IL plan.

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.**

By Policy at RSM II, Section 405, Application, all applicants for DORS services, including ILOB services, are provided a copy of the Client Assistance Program (CAP) brochure in the requested format of the applicant.

It is also the policy of each of the CILs that CAP information is provided in the requested format and consumers sign off on the receipt of that information. In the event DORS grants state funds to a non-CIL service provider, the MOU shall stipulate that the service provider advise applicants and eligible individuals about the availability of CAP, its purposes and contact information for CAP.

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 DSU (DORS) protects the personal information of all applicants and eligible individuals as described in DORS Policy, RSM II, Section 200, Confidentiality, and COMAR 13A.11.06, Records of Services.

All CILs take the appropriate precautions to protect the personal information of consumers. These measures are reflected in the policies and procedures of each Center. In the event DORS grants state funds for IL AT services to a non-CIL service provider, the MOU shall stipulate the requirement to maintain confidentiality of all personal information, consistent with 34 CFR 364.56(a).

Section 7: Evaluation

- #### **7.1 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

1. Submit an Annual 704 Report to RSA in conjunction with DORS.

MSILC, and IL AT service providers, as applicable, will jointly with DORS prepare information for Part I of the report and submit it to RSA by required submission date.

2. The MSILC Outcomes sub-committee monitors progress of the SPIL. It assesses progress on a monthly basis and reports to the Full Council as an agenda item at each Council meeting, and also reports progress to the IL Partners at least annually.
3. Annual review of MSILC expenditures. The MSILC Executive Director and executive committee will review the annual statement of MSILC expenditures and will report the results to the full Council and to DORS as required.
4. The Maryland IL Partners will develop and implement a sample model/common consumer satisfaction survey process; results will be available statewide. Findings will be used for planning purposes. This is consistent with Goal 1, Objective 2.

Section 8: State-Imposed Requirements

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

The DSU (DORS) applies a financial means test to most DSU-provided Independent Living Older Blind services.