

**SPIIL Instrument - 2013 Extension**

State:   TN  

**STATE PLAN FOR  
INDEPENDENT LIVING  
(SPIIL)**

**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   2017-2019**

Effective Date: October 1,   2016

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**PART I: Assurances**

State of: Tennessee

**Section 1: Legal Basis and Certifications**

1.1 The designated State entity (DSE) 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.

Tennessee Division of Rehabilitation Services

1.2 The separate State agency eligible to submit the plan and authorized under State law to provide vocational rehabilitation (VR) services to individuals who are blind.

N/A

1.3 The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State.

Statewide Independent Living Council of Tennessee

1.4 The DSE and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the SPIL. *Yes, once the DSE and the SILC approves. This language does not match up with WIOA, but we have been instructed by ACL to use this tool. Per WIOA, the SPIL is signed by the CILs and the SILC Chair on behalf of the SILC.*

1.5 The DSE, and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, may legally carry out each provision of the plan and will comply with all applicable Federal statutes and regulations in effect with respect to the three-year period it receives funding under the SPIL.

Yes

1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law.

Yes

1.7 The representative of the DSE 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.

Cherrell Campbell-Street, Assistant Commissioner

**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.

Yes

2.2 The DSE and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan.

Yes

2.3 The DSE 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.

Yes

2.4 At the public meetings to develop the State plan, the DSE and SILC identify those provisions in the SPIL that are State-imposed requirements beyond what would be required to comply with the regulations in 34 CFR parts 364, 365, 366, and 367.

Yes

2.5 The DSE 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 DSE determines to be effective.

N/A

2.6 The DSE and SILC actively consult, as appropriate, in the development of the State plan with the director of the Client Assistance Program (CAP) authorized under section 112 of the Act.

Yes

### **Section 3: Independent Living Services**

3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other funds.

Yes

3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary.

Yes

3.3 All service providers will use formats that are accessible to notify individuals seeking or receiving IL services under chapter 1 of title VII about:

- the availability of the CAP authorized by section 112 of the Act;
- the purposes of the services provided under the CAP; and
- how to contact the CAP.

Yes

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

Yes

### **Section 4: Eligibility**

4.1 Any individual with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and CIL programs authorized under chapter 1 of title VII of the Act. Any individual may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate. The determination of an individual's eligibility for IL services under the SILS and CIL programs meets the requirements of 34 CFR 364.51.

Yes

4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services.

Yes

4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services.

Yes

### **Section 5: Staffing Requirements**

5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers.

Yes

5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:

- with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille or audio tapes, and who apply for or receive IL services under title VII of the Act; and
- in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act.

Yes

5.3 Service providers establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development programs emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

Yes

5.4 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will take affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act.

Yes

### **Section 6: Fiscal Control and Fund Accounting**

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

Yes

### **Section 7: Recordkeeping, Access and Reporting**

7.1 In addition to complying with applicable Uniform Guidance beginning at 2 CFR § 200 record keeping requirements, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain records that fully disclose and document:

- the amount and disposition by the recipient of that financial assistance;
- The total cost of the project or undertaking in connection with which the financial assistance is given or used;
- the amount of that portion of the cost of the project or undertaking supplied by other sources;
- compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
- other information that the Commissioner determines to be appropriate to facilitate an effective audit.

Yes

7.2 With respect to the records that are required by 34 CFR 364.35, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate.

Yes

7.3 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will provide access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, to the records listed in 34 CFR 364.37 for the purpose of conducting audits, examinations, and compliance reviews.

Yes

### **Section 8: Protection, Use, and Release of Personal Information**

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

Yes

### **Section 9: Signatures**

After having carefully reviewed all of the assurances in sections 1 - 8 of this SPIL, the undersigned hereby affirm that the State of \_\_\_\_\_ is in compliance and will remain in compliance with the aforementioned assurances during \_\_\_\_\_ (specify the three-year period covered by this SPIL).

The effective date of this SPIL is October 1, \_\_\_\_\_ (year)

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SIGNATURE OF SILC CHAIRPERSON

DATE

Beth James  
\_\_\_\_\_  
NAME OF SILC CHAIRPERSON

\_\_\_\_\_  
SIGNATURE OF DSE DIRECTOR DATE

Cherrell Campbell-Street, Assistant Commissioner  
\_\_\_\_\_  
NAME AND TITLE OF DSE DIRECTOR

N/A  
\_\_\_\_\_  
SIGNATURE OF DIRECTOR OF THE SEPARATE DATE  
STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

N/A  
\_\_\_\_\_  
NAME AND TITLE OF THE DIRECTOR OF THE  
SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

**CIL Directors' Signatures**

\_\_\_\_\_  
SIGNATURE OF CIL DIRECTOR DATE

Sandi Klink, Executive Director, Memphis Center for Independent Living  
\_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF CIL DIRECTOR DATE

Beth James, Executive Director, Jackson Center for Independent Living  
\_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF CIL DIRECTOR DATE

Brandon Brown, Executive Director, Empower TN  
\_\_\_\_\_

\_\_\_\_\_  
SIGNATURE OF CIL DIRECTOR DATE

Mark Wolfall, Executive Director, Tri-State Resource and Advocacy Corp  
\_\_\_\_\_



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SIGNATURE OF CIL DIRECTOR

DATE

Denise Wardle, Executive Director, TARP Center for Independent Living

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SIGNATURE OF CIL DIRECTOR

DATE

Lillian Burch, Executive Director, Disability Resource Center

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**Part II: Narrative**

**Section 1: Goals, Objectives and Activities**

**1.1 Goals and Mission**

Describe the overall goals and mission of the State's IL programs and services. The SPIL must address the goals and mission of both the SILS and the CIL programs, including those of the State agency for individuals who are blind as they relate to the parts of the SPIL administered by that agency.

**Mission:**

To promote independent living in Tennessee and support the independent living philosophy, it's practices and its values to all citizens.

**Goal 1: Tennesseans have an awareness of resources available that support Independent Living for people with disabilities.**

**Goal 2: Independent Living Services Network builds capacity and sustains expansions.**

**Goal 3: Tennesseans with disabilities have access to the community-based resources they need.**

**1.2 Objectives**

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

Goal(s) from Section 1.1	Objective to be achieved	Time frame start date	Time frame end date
Goal 1: Tennesseans have an awareness of resources available that support Independent Living for people with disabilities.	1.1 Outreach work to continue.	10/01/16	09/30/19
	Action Steps:		
	1.1.a. Each CIL will continue providing education to community members, partner organizations and people with disabilities on the core services provided by the CIL and its employees.	10/01/16	9/30/19
	1.1.b. Each center will research how to most efficiently and effectively reach consumers,		

	community members and partner organizations inside and outside their service areas.	10/01/16	9/30/19
Goal 1: Tennesseans have an awareness of and access to resources available that support Independent Living for people with disabilities.	1.2 Increase knowledge of IL services for youth transition.  Action Steps:	10/01/16	09/30/19
	1.2.a. CILs will continue and increase outreach activities to schools within core service areas.	10/01/16	09/30/19
	1.2.b. CILs will offer collaboration with selected state contractors for youth mentorship transition services, and other local and statewide transition service providers.	10/01/16	09/30/19
	1.3 A needs assessment will be conducted  Action Steps:	10/01/16	09/30/19
	1.3.a. SILC will collaborate with CILS and other community partners in developing a needs assessment/consumer satisfaction survey to identify gaps in services.		
	1.3.b. Results of the survey, gaps analysis, and other gathered information will be compiled and used to guide future planning activities, and will be disseminated via an annual report process to interested parties statewide.		
	1.3.c. SILC and CILs, to their capacity, in collaboration with community partners, will explore the development of a statewide database.		
Goal 2: Independent Living Services Network builds capacity and sustains expansions.	2.1 CILs communicate with community partners to coordinate IL services within their communities.	10/01/16	09/30/19

	<p>Action Steps:</p> <p>2.1.a. CILs and SILC will create awareness of CIL presence in the community and the services they provide.</p> <p>2.1.b. CILs and SILC will collaborate with community partner organization to assess needed services for consumers.</p> <p>2.1.c. Submit at least one grant related to increased IL capacity.</p>	<p>10/01/16</p> <p>10/01/16</p> <p>10/01/16</p>	<p>09/30/19</p> <p>09/30/19</p> <p>09/30/19</p>
Goal 2 Independent Living Services Network builds capacity and sustains expansions.	<p>2.2 The SILC will pursue additional outside funding opportunities to expand consumer services and promote the value and services of CILs.</p> <p>Action Steps:</p> <p>2.2.a. Researching new funding or grant opportunities to collaborate with CILs to expand consumer services.</p> <p>2.2.b. Work with CILs and other stakeholders on potential funding opportunities.</p> <p>2.2.c. SILC to offer technical assistance to CILS regarding resource development for strategic planning, expansion of programs or awareness of CIL services and programs.</p>	<p>10/01/16</p> <p>10/01/16</p> <p>10/01/16</p> <p>10/01/16</p> <p>10/01/16</p>	<p>09/30/19</p> <p>09/30/19</p> <p>09/30/19</p> <p>09/30/19</p> <p>09/30/19</p>
Goal 2 Independent Living Services Network builds capacity and sustains expansions.	<p>2.3 Secure state funding for independent living services</p> <p>Action Steps:</p> <p>2.3.a The SILC, and CILs to their capacity, will continue to educate legislators about IL services.</p> <p>2.3.b. CILs and SILC will organize consumers' advocacy efforts for increased</p>	<p>10/01/16</p> <p>10/01/16</p>	<p>09/30/19</p> <p>09/30/19</p>

	<p>funding for Independent Living Services.</p> <p>2.3.c. CIL representative or SILC makes at least an annual request to the DSE for additional IL funding on behalf of the network of centers.</p>	10/01/16	09/30/19
Goal 3: Tennesseans with disabilities have access to the community-based resources they need.	<p>3.1 People with disabilities will receive the necessary services to remain in their homes, thus diverting them from an institution.</p> <p>Action Steps:</p> <p>3.1.a. Provide assistive technology and equipment as needed and to the capacity of the CILs to ensure a safe and improved quality of life.</p> <p>3.1.b. Provide accessible environmental home modifications as needed for independence and to the capacity of the CILs.</p>	10/01/16  10/01/16  10/01/16  10/01/16	09/30/19  09/30/19  09/30/19  09/30/19
Goal 3: Tennesseans with disabilities have access to the community-based resources they need.	<p>3.2 Tennesseans with disabilities have access to the health care they need.</p> <p>Action Steps:</p> <p>3.2.a. The SILC in collaboration with the CILs, will explore with community partners, such as Disability Rights Tennessee and the Tennessee Disability Coalition a strategy to educate consumers about available health care.</p>	10/01/16  10/01/16	09/30/19  09/30/19
	<p>3.3 Assist persons with disabilities to exercise their right to vote.</p> <p>Action Steps:</p> <p>3.3a. Collaborate with other appropriate agencies, such as Disability Rights TN and TN Disability Coalition on strategies to</p>	10/01/16	09/30/19

	decrease barriers to voting for people with disabilities.		

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;

Much of Tennessee is rural and all the CIL service areas can be considered underserved as no CIL yet, has the capacity to serve the population of people with disabilities within their service area. Funding continues to be a barrier to build the capacity of the current Centers, yet with the new SILC duties and authorities, the TN IL Network is committed to resource development. The TN SILC prioritizes raising all CILs to a minimum funded set at \$200,000. The SILC emphasizes focusing on developing the current network of CILs to provide services to more Tennesseans with disabilities.

According to the United States Census Bureau Tennessee’s overall population, as of July 1, 2015 equal 6,600,299, with 18.3% or 1,207,855 people in poverty, 14% or 930,642 people without health insurance, and 739,234 people with a disability. Tennessee’s minority populations include: 16.7% Black or African American, 5% Hispanic or Latino, 1.7% Asian and .4% American Indian and Alaska Native.

The CILs’ outreach efforts include, but are not limited to: presentations; agency contacts; website; public service announcements; exhibits/displays, conferences, social media, printed materials, community events, and peer support groups.

The DSE and the CIL’s are all now mandated to make transitioning students from school to work a priority; it is one prong of the fifth core service for centers. VR counselors are to work with students while they are in school and the centers are to work with students once they have left post-secondary education. It is imperative that DRS, Vocational Rehabilitation and the TN CILs work together to coordinate services for students, to ensure they receive necessary services and are well prepared for finding employment or going on to post-secondary education opportunities. VR counselors should be encouraged to seek out center staff in order to develop a joint transitioning plan for students ready to leave high school. Training opportunities may be available at the centers that can assist the VR counselors with a student’s preparation for employment.

Each CIL will develop outreach materials designed specifically to target individuals who meet the definition of youth, as defined by WIOA. The CILs will help identify entities, stake holders and venues that will provide access to eligible youth or service providers that serve youth such as Special Education Departments, youth transition fairs, Technical Schools, etc. for outreach activities.

CIL's are also mandated to provide transition and diversion services for individuals who are living in institutional settings wishing to live in an integrated community based setting of their choice. Currently, funded transition services are provided through the state's Money Follows the Person program. The MFP program utilizes the services of one CIL and, this program only supports individuals eligible for Medicaid waiver services.

It is the goal of the centers to be viewed as a valued partner in the state's MFP sustainability plan, as well as to provide services to those who do not meet the criteria for the MFP program. However, these services must be driven by the center's capacity to do so, since the mandate did not include supplementary funding to provide this additional core service.

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

The CILs will focus outreach effort to increase awareness of availability of services. Efforts will include individual CIL activities as well as joint SILC activities with an ongoing focus on resource development. This outreach will include all the counties that are not served by the CILs' Part C grants. The following counties will be targeted by outreach efforts: Dyer, Lauderdale, Tipton, Fayette, McNairy, Hardin, Wayne, Lewis, Lawrence, Giles, Hickman, Maury, Marshall, Bedford, Lincoln, Bedford, Moore, Franklin, Coffee, Cannon, DeKalb, White, Smith, Trousdale, Macon, Clay, Pickett, Overton, Putnam, Vanburen, Warren, Cumberland, Fentress, Scott, Morgan, Roane, Campbell, Anderson, Loudon, Blount, Monroe, Sevier, Jefferson, Union, Grainger, Hamblen, Sullivan, Johnson, Carter, Washington, Unicoi, Greene, Hawkins, Hancock, and Claiborne.

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

CIL staff will maintain contact with local community partners that are minority focused to educate them on CIL services and encourage referrals. CIL staff will collaborate with youth and family focused organizations, to increase independent living opportunities to young people with disabilities. The CILs, as cross disability organizations, will continue to collaborate with local groups representing minorities, such as Native Americans, Hispanic, Asian, African American, and others representing minority groups so that IL services are provided in an accessible manner to those they represent. CILs will continue developing culturally appropriate outreach and service delivery strategies to meet the needs of these groups.

### 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.

**Year 1**

<b>Sources</b>	<b><u>Approximate Funding Amounts and Uses</u></b>			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
<b>Title VII Funds</b>				
Chapter 1, Part B	\$200,000	\$134,363		
Chapter 1, Part C				
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other				
<b>Non-Federal Funds</b>				
State Funds match				37,151
Other				

**Year 2**

<b>Sources</b>	<b><u>Approximate Funding Amounts and Uses</u></b>			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
<b>Title VII Funds</b>				
Chapter 1, Part B	\$200,000	\$134,363		
Chapter 1, Part C				



Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other				
<b>Non-Federal Funds</b>				
State Funds				37,151
Other				

**Year 3**

<b>Sources</b>	<b>Approximate Funding Amounts and Uses</b>			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
<b>Title VII Funds</b>				
Chapter 1, Part B	\$200,000	\$134,363		
Chapter 1, Part C				
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other				
<b>Non-Federal Funds</b>				
State Funds				37,151

Other				
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### 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.

The TN CILs and the TN SILC coordinate the flat amount of funds received to meet the needs of the over 700,000 Tennesseans with disabilities. The TN CILs serve 36 counties with their Part C funding. There are 59 counties that do not have full access to a CIL. The unmet need far exceeds the available resources.

Part B funding will be used to provide independent living services to people with significant disabilities and to support activities in the SPIL objectives. Part C funding will continue to be used to support CIL operations funding six Centers. Tennessee receives \$334,363 in Title VII, Part B funding plus the 10% state match for a total of \$371,514. This funding will be granted to the TN CILs and SILC by the DSE for the provision of independent living services to people with significant disabilities. It has been determined by the Council that only Centers participating in SILC meetings in person will be eligible for Part B funding.

Chapter 1 Part B dollars are used to fund the SILC Resource Plan in the amount of \$200,000 for each year (FY17-19), The SILC receives approximately 59 percent of Chapter 1 Part B dollars to conduct quarterly meetings, providing travel for the council members and the CIL directors per the SILC bylaws. The SILC also conducts extensive resource development striving for sustainable expansion of independent living programs throughout the state. The SILC's budget includes strategic planning for the CILs, advocacy training, legislative education and a comprehensive needs assessment process partnering with local universities and the DD Network. T.A.R.P Center for Independent Living will receive \$25,000 raising their funding to the TN minimum level of a minimally funded CIL which is \$200,000. T.A.R.P Center for Independent Living will receive Part B funds for this purpose until their Part C dollars amount to \$200,000.

Disability Resource Center in Knoxville declined the available step-down funds (\$50,000 FY17, \$40,000 FY18 and \$30,000 FY19) to expand services in some of the Northeast TN counties. Disability Resource Center in Knoxville also declined any Part B funding. The SPIL team recommended to equally allocate the \$50,000, designated to dRC to provide IL services in NE TN counties, to the other four participating CILs (Memphis, Jackson, Paris and Nashville). The SPIL team also recommended that the SILC use existing funds in FY17 for resource development in the NE TN counties as those counties remain a priority.

Memphis Center for Independent Living will receive \$23,161 for FY 2017, FY 2018 and FY 2019, Jackson Center for Independent Living will receive \$23,161 for FY 2017, FY 2018 and FY 2019, T.A.R.P. Center for Independent Living will receive \$23,161 for FY 2017, FY 2018 and FY 2019 and Empower TN will receive \$23,161 for FY 2017, FY 2018 and FY 2019. The funds are to be used in accordance with Title I and Title VII of The Rehabilitation Act of 1973, as amended in 2014, (Workforce Innovation and Opportunity Act), and work within the scope of

the 2017-2019 State Plan for Independent Living, the five (5) core independent living services (Information and Referral, Independent Living Skills Training, Peer Support, Individual and Systems Advocacy, and Transition). Additionally, this funding is to be used to work within the scope of the 2017-2019 State Plan for Independent Living collaborating with the SILC to develop a resource plan to increase CIL capacity and sustainability to provide IL services in Tennessee.

The Older Individuals who are Blind (OIB) Program, CILs and VR have consumers who are blind with common service needs. These programs intend to collaborate to meet the needs of this population. However, those program's funding streams are not combined.

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.

SILCTN, DRS and the CILs ensure coordination and cooperation by which each other and other providers of IL or closely related services at the federal, state, county, municipal and public/private sector levels. Representatives of DRS and the CILs participate on the TNSILC, State Rehabilitation Council Board, and will visit and interact with staff from the other organizations. When appropriate, consumers in the various programs and each agency provides information to consumers about other programs. The DSE and TNSILC continue collaboration with centers and other entities serving persons with disabilities to avoid the duplication of efforts and to enhance the number of individual receiving ILs.

1.3B(3) Describe any in-kind resources including plant, equipment or services to be provided in support of the SILC resource plan, IL services, general CIL operations and/or other SPIL objectives.

The DSE, Department of Rehabilitation Services, in collaboration with the SILC and the IL Network, will provide in-kind support as needed and available.

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

Pursuant to Section 705 (c)(d)(e) of the Act and proposed rule 45 CFR Part 1329; the TN SILC does not engage in activities beyond statutory duties, authorities, and responsibilities.

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

1.4A Describe how the SPIL objectives are consistent with and further the purpose of chapter 1 of title VII of the Act as stated in section 701 of the Act and 34 CFR 364.2.

The State Plan for Independent Living reflects the beliefs of the TNSILC and the CILs in promoting a philosophy of independent living including a philosophy of consumer control, peer support, self-help, self-determination, equal access, and individual and system advocacy to maximize the leadership, empowerment, independence, and productivity of individuals with significant disabilities and to promote and maximize the integration and full inclusion of

individuals with significant disabilities into the mainstream of American society.

The SPIL encourages continued coordination, cooperation, and communication between the TNSILC and CILs as well as the DSE (TNDRS). This provides an opportunity to help ensure that all stakeholders are advised of, sensitive to, and responsive to the needs of individuals with significant disabilities identified by the centers in their service areas; the plans of the centers to address those needs; and that the CILs operate in a manner consistent with the SPIL.

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

The TN participating CILs, the TN SILC and the DSE (Tennessee Division of Rehabilitation Services) are all part of the SPIL planning team. Efforts were made to ensure that all stakeholders have ample opportunities to provide input into the development of the objectives for the SPIL, as well as other elements of the State Plan. The TN CILs provided leadership in the development of the objectives, action steps, and outcomes for this SPIL.

The SILC sponsored a SPIL team retreat, using a facilitator, encouraging all Center directors and interested Council members to participate to identify statewide needs and priorities. The SPIL retreat information was compiled and used to write the first raft of the SPIL. The first draft of the SPIL was then sent out to the SPIL team for review and comments prior to the public comment period. The SPIL team met three more times by conference call along with email communication. The SPIL process was discussed at the SILC quarterly meeting in May, 2016.

#### 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.

The TNSILC, TNDRS and the CILs have a strong partnership that includes frequent communication and meetings to plan, strategize and coordinate statewide efforts.

With the new organization determined by the Workforce Innovation and Opportunity Act (WIOA), the Developmental Disabilities Network may be a strong partner as they are also governed by the Administration on Community Living (ACL). Additionally, there is encouragement from ACL for the IL Network and the DD Network to collaborate. The two networks have met formerly with ACL representatives in attendance and future collaborative

meetings have been set.

- The Disability Policy Alliance - an organized, formal collaborative to unify and strengthen Tennessee affiliates of national disability advocacy groups in public policy work. The Alliance develops policy and legislative priorities and annual goals during the legislative sessions. The members are: The Arc of Tennessee, Tennessee Council on Developmental Disabilities, Disability Rights Tennessee and, the Statewide Independent Living Council of Tennessee.
- The Tennessee Disability Coalition: represents statewide cross disabilities. All of the members are board members. By having a presence of the CIL and SILC board members on their Board, we can encourage more investment in CILs especially in unserved and underserved areas.
  
- The TN SILC executive director is a member of the following statewide councils:
  - o Tennessee Technology Access Program, Statewide Advisory Council - This council is developed due to the Assistive Technology Act of 2004. It is to provide consumer-responsive, consumer- driven advice to the state of Tennessee for the planning, implementation, and evaluation of the activities carried out through the grant.
  - o State Rehabilitation Council: an advisory board to DRS issues relating to persons with significant disabilities.
  - o TN Family Support Council: Services might include but are not limited to: respite care, before/after care, day care, home/vehicle modifications, specialized equipment/repair/maintenance, nutrition/clothing/supplies, personal assistance, transportation, homemaker services, housing costs, health related costs, nursing, counseling, summer camp, and evaluation. The program funds services and needs that are not covered by traditional resources.

#### 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 composition of the TN SILC assures a broad, cross representation of these entities, as well as the opportunity to disseminate information/updates as applicable, to the membership.

The SILC and CILs participate in active partnership with other entities, such as local transit authorities, to develop and disseminate checklists to rural community disability leaders relative to increasing their knowledge on transportation issues.

The TN SILC executive director continues to make scheduled reports meeting frequently with the DSE and CILs regarding the implementation and progress of the SPIL in compliance with the grant requirements.

Tennessee CILs collaborate with numerous other organizations as noted in the scope of services

and other areas of the 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 DSE determines to be effective.

N/A

**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).

<b>Table 2.1A: Independent living services</b>	<b>Provided by the DSE (directly)</b>	<b>Provided by the DSE (through contract and/or grant)</b>	<b>Provided by the CILs (Not through DSE contracts/ grants)</b>
Core Independent Living Services, as follows:	Yes	Yes	Yes
- Information and referral	Yes	Yes	Yes
- IL skills training	No	Yes	Yes
- Peer counseling	No	Yes	Yes
- Individual and systems advocacy	No	Yes	Yes
Counseling services, including psychological, psychotherapeutic, and related services	No	No	No
Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with significant disabilities)	No	No	No
Rehabilitation technology	No	No	No
Mobility training	No	No	No
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	No	No	No

<b>Table 2.1A: Independent living services</b>	<b>Provided by the DSE (directly)</b>	<b>Provided by the DSE (through contract and/or grant)</b>	<b>Provided by the CILs (Not through DSE contracts/ grants)</b>
Personal assistance services, including attendant care and the training of personnel providing such services	Yes	Yes	Yes
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	Yes	Yes	Yes
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act	Yes	Yes	Yes
Education and training necessary for living in the community and participating in community activities	Yes	Yes	Yes
Supported living	No	No	No
Transportation, including referral and assistance for such transportation	Yes	Yes	Yes
Physical rehabilitation	No	No	No
Therapeutic rehabilitation	No	No	No
Provision of needed prostheses and other appliances and devices	No	No	No
Individual and group social and recreational services	Yes	Yes	Yes
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	Yes	Yes	Yes
Services for children with significant disabilities	No	No	Yes
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities	No	No	No
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	No	No	Yes
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	Yes	Yes	Yes

<b>Table 2.1A: Independent living services</b>	<b>Provided by the DSE (directly)</b>	<b>Provided by the DSE (through contract and/or grant)</b>	<b>Provided by the CILs (Not through DSE contracts/ grants)</b>
Other necessary services not inconsistent with the Act	No	No	No

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

- TN’s first priority is to increase the capacity for the existing network of CILs. Much of Tennessee is rural and all the CIL service areas can be considered underserved as no CIL yet, has the capacity to serve the population of people with disabilities within their service area. \$200,000 is the amount identified as a minimally funded CIL.

- Education of legislators and the Governor of the need for funding for non-Part C CIL counties to ensure every Tennessean with a disability have full access to CIL services.

- Youth transition services and diversion services.

- Expand IL services to unserved areas. NE TN remains a priority. The SILC will initiate resource development in that area.

The TN CILs are encouraged to collaborate with the SILC and other entities to increase funding through resource development.

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.

N/A

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

2.2A If the DSE will provide any of the IL services identified in section 2.1A through grants or contractual arrangements with third parties, describe such arrangements.

Memphis Center for Independent Living will receive \$23,161 for FY 2017, FY 2018 and FY



2019, Jackson Center for Independent Living will receive \$23,161 for FY 2017, FY 2018 and FY 2019, T.A.R.P. Center for Independent Living will receive \$23,161 for FY 2017, FY 2018 and FY 2019 and Empower TN will receive \$23,161 for FY 2017, FY 2018 and FY 2019. The funds are to be used in accordance with Title I and Title VII of The Rehabilitation Act of 1973, as amended in 2014, (Workforce Innovation and Opportunity Act), and work within the scope of the 2017-2019 State Plan for Independent Living, the five (5) core independent living services (Information and Referral, Independent Living Skills Training, Peer Support, Individual and Systems Advocacy, and Transition). Additionally, this funding is to be used to work within the scope of the 2017-2019 State Plan for Independent Living collaborating with the SILC to develop a resource plan to increase CIL capacity and sustainability to provide IL services in Tennessee.

Disability Resource Center in Knoxville declined the available step-down funds (\$50,000 FY17, \$40,000 FY18 and \$30,000 FY19) to expand services in some of the Northeast TN counties. Disability Resource Center in Knoxville also declined any Part B funding. The SPIL team recommended to equally allocate the \$50,000, designated to dRC to provide IL services in NE TN counties, to the other four participating CILs (Memphis, Jackson, Paris and Nashville). The SPIL team also recommended that the SILC use existing funds in FY17 for resource development in the NE TN counties as those counties remain a priority.

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 Department of Human Services Office of Inspector General (Contract Unit) conducts bi-annual monitoring reviews of all centers receiving Part B or other State grants for the general operation of the center to ensure compliance with the grant/contract and statutory provisions of the Act as amended that includes eligibility determination made by the center. Results of the site reviews will be provided to the DSE/SILC and recorded in the 704 Part I compliance report.

### **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.

The Memphis Center for Independent Living serving Shelby County comprised of approximately 168,706 persons with disabilities.

Jackson Center for Independent Living serving 8 counties (Madison, Carroll, Crockett, Gibson, Henderson, Chester, Hardeman, and Haywood) comprised of approximately 59,669 persons with disabilities.

Empower Tennessee service area includes one urban county and six rural counties in Middle Tennessee. With a service area of more than 6000 square miles and a population of people with disabilities greater than 200,000.

The TARP Center for Independent Living serving 8 counties (Benton, Dickson, Henry, Houston, Humphreys, Montgomery, Stewart, and Weakley) comprised of approximately 43,000 persons with disabilities and a total population of 358,329 according to the 2010 U.S. Census.

Disability Resource Center, Knoxville, TN serving the City of Knoxville and Knox County comprised of approximately 65,756 persons with disabilities under the age of 65 and a total population of 643,925 (US Census 2014).

Tri-State Resource and Advocacy Center serving 10 counties (Bledsoe Bradley Grundy Hamilton Marion McMinn Meigs Polk Rhea Sequatchie) with approximately 118,764 persons with disabilities.

The Memphis Center for Independent Living serving Shelby County comprised of approximately 116,384 persons with disabilities. (total population: 923,986)

Jackson Center for Independent Living serving 8 counties (Madison, Carroll, Crockett, Gibson, Henderson, Chester, Hardeman, and Haywood) comprised of approximately 46,158 persons with disabilities. (total population: 274,377)

Empower Tennessee service area includes one urban county (Davidson) and six suburban/rural counties (Cheatham, Robertson, Rutherford, Sumner, Williamson, Wilson) in Middle Tennessee. comprised of approximately 162,113 persons with disabilities and a total approximate population of 1,494,868.

The TARP Center for Independent Living serving 8 counties (Benton, Dickson, Henry, Houston, Humphreys, Montgomery, Stewart, and Weakley) comprised of approximately 53,778 persons with disabilities and a total population of 340,821 according to 2014 U.S. Census Data.

Disability Resource Center, Knoxville, TN serving the City of Knoxville and Knox County comprised of approximately 55,458 persons with disabilities and a total population of 437,168 (US Census 2014).

Tri-State Resource and Advocacy Center serving 10 counties (Bledsoe Bradley Grundy Hamilton Marion McMinn Meigs Polk Rhea Sequatchie) with approximately 107,409 persons with disabilities. (total population: 620,353).

### 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).

It is a Tennessee priority to support the needs of existing centers in their efforts to establish an effective statewide network of IL services. Should new, long term, ongoing additional Title VII, Part C federal funding become available during the course of this three-year plan, the funds will be distributed according to the following:

- a) Long term funds up to \$ 50,000.00 a year will be distributed equally among existing federally funded CILs, participating with the SILC, in Tennessee that meet the federal definition of a Center for Independent Living. This ensures the established statewide network and its infrastructure to provide service and outreach can be maintained.
- b) Long term, ongoing funds greater than \$50,000.00 could be used to support expanded services within a Tennessee CIL or CILs. When notification of additional funding is received the SILC will inform the CILs and initiate a collaborative process including a needs assessment and application process. This ensures that the expanded services of a CIL interested in pursuing federal funding will further the goals of a establishing a statewide network of IL services in Tennessee.
- c) Long term, ongoing funds greater than \$ 300,000 could be used to begin the establishment of a new CIL. When notification of additional funding is received the SILC will inform the CILs and initiate a collaborative process including a needs assessment and application process. It will be established that a routine process to create or locate a new CIL will include thoughtful collaboration between the Tennessee CILs to ensure a new CIL is located in a community of need, the SILC to ensure compliance with provisions of the SPIL and the DSE to ensure the inclusion of their duties as defined in The Rehab Act, as amended.
- d) Any one time or short-term federal non-Title VII Part C funds that are not restricted, would be equally distributed to all CILs. When notification of additional funding is received the SILC will inform the CILs and initiate a collaborative process between the CILs, the SILC and the DSE to distribute the funds and discuss any additional requirements.

A minimum funding level of \$300,000 in operating funds is established for Part C funding. If sustained, ongoing, Part C funding of \$300,000 is available to the CIL Network the priority for a new CIL is Northeast Tennessee including the following counties: Sevier, Jefferson, Union, Grainger, Hamblen, Sullivan, Johnson, Carter, Washington, Unicoi, Greene, Hawkins, Hancock, and Claiborne. Other counties not receiving Part C funds are listed in priority: Dyer, Lauderdale, Tipton, Fayette, McNairy, Hardin, Wayne, Lewis, Lawrence, Giles, Hickman, Maury, Marshall, Bedford, Lincoln, Bedford, Moore, Franklin, Coffee, Cannon, DeKalb, White, Smith, Trousdale, Macon, Clay, Pickett, Overton, Putnam, Vanburen, Warren, Cumberland, Fentress, Scott, Morgan, Roane, Campbell, Anderson, Loudon, Blount, Monroe, Sevier.

Should a Part C CIL either relinquish or have its award terminated and after collaboration with the Administration on Community Living; the first priority will be to guarantee continuation of services covering the service area vacated by the Part C CIL that relinquished or had its federal award terminated.

### 3.3 Section 723 States Only – 34 CFR 364.39

N/A

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: Designated State entity (DSE)**

##### 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 DSE for the SILS (Part B) program and, if the State is a Section 723 State, for the CIL (Part C) program.

The DSE provides the following support services:

- Assign a SILC Liaison and facilitate State independent living services; -Collaborate with the SILC/centers and other organizations serving persons with significant disabilities to develop and implement the SPIL;
- Collaboration with the SILC Executive Director in the preparation of the 704 Part I Report;
- Develop part B and other DSE CIL funded grants and contracts;
- The DHS Office of Inspector General (Contract Monitoring Division) will conduct regular scheduled site reviews of all centers receiving part B or other DSE grants or contracts;
- Collaborate with the SILC to prepare and SILC nominations to the Governor;
- Support CIL activities such as in-kind use of VR facilities, town hall meetings, ADA and fundraising events;
- Participate in CIL on-site reviews with RSA.

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

The DSE provides Part B grants to the SILC and CILs to carry out provisions of the SPIL and facilitate the funding of the SILC Resource Plan. The DSE is responsible for all oversight responsibilities related to Part B funding of the SILC, CILs or other provision of State Independent Living Services (SILS).

#### **Section 5: Statewide Independent Living Council (SILC)**

##### 5.1 Resource plan

5.1A Describe the resource plan prepared by the SILC in conjunction with the DSE 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 TN SILC resource plan includes:

- \$200,000 Part B funds.

The TN SILC intends to conduct activities under the new authorities provided for the Act as follows:

- Conduct advocacy activities to ensure state policies and services are in place that ensure all Tennesseans are valued equally and participate fully in their communities.
- Develop and implement a resource development plan to support the activities of the SILC.
- Collaborate with the CILs on resource development to expand capacity of current CILs.
- Collaborate with the CILs to develop a process of disbursement should new long-term, ongoing additional funds become available.
- Conduct leadership development activities for current and potential SILC members.
- Conduct research to gather data on the return on investment and the economic impact of CILs.

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 Council reviews the resource plan at each quarterly meeting. SILC monthly requests for reimbursements are passed to the DSE grant unit to be submitted to the State financial department.

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

No conditions or requirements are included in the SILC Budget that will compromise the independence of the SILC. The SILC request and receives advanced grant payments from the DSE in order to carry out its functions identified in section 705 (c).

While assisting the SILC in carrying out its duties under the SPIL, staff and other personnel assigned to the SILC under the SILC Resource Plan will not be assigned duties by the DSE or other agency or office of the State that would create a conflict of interest.

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

The SILC and the DSE support the ideal of all Part B funds to be used to further the purpose of Title VII, Chapter 1 of the Act. The DSE provides available in-kind IL resources to facilitate SPIL accomplishments.

## 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 DSE and all other State agencies.

The SILC is not established as an entity within any State agency, including the DSE, and is independent of the DSE and all other State agencies. Following is a brief description of the legal status and placement of the SILC:

The Statewide Independent Living Council of Tennessee, Inc. is a 501(c) 3 status, non-profit agency at 2601 Elm Hill Pike, Suite 0, Nashville, TN 37214. It is independent of the DSE. The SILCs current operational functions are delegated to a paid SILC Executive Director.

## 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).

The Governor makes the appointments to the SILC with recommendations from the SILC. The chairperson is elected, from among the voting members of the SILC, by the voting members of the SILC. Term limits are maintained through record-keeping and by filling vacancies for full terms or partial terms, as applicable.

The Executive Director collaborates with the DSE liaison to develop the packet to include representatives of organizations representing a broad range of individuals with disabilities, and organizations interested in individuals with disabilities, to be sent to the Governor's office. The SILC and DSE maintain a grid of all current members indicating terms served dates of appointed term, seat requirements, whether the member has a disability, and geographic region representation.

Term limits and vacancies are maintained by quarterly membership updates at each Council meeting by the DSE Liaison.

## 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.

As stated in the SILC By-Laws; the Executive Director serves at the pleasure of the Council Chair. The entire Executive Committee is involved in reviewing and evaluating the Executive Director's performance and annual review. The Executive Director serves as a full time staff and other staff as needed to implement the SILC mandates pursuant to Section 705 of the

Rehabilitation Act, as amended.

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

There is no assignment of duties by the DSE or any other agency to the SILC staff.

## **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 State Independent Living Services (SILS) have appropriate employment practices and policies in place regarding hiring, training and on-going training and annual evaluation. Hiring practices encourage prioritizing individuals with disabilities for all positions within SILS. CILs entities maintain a minimum staffing of 51% of people with disabilities, some as high as 75%, in order to appropriately deliver services such as peer counseling, information and referral, nursing home transitioning, youth transition, advocacy for transportation, housing, and equality.

- 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.

CILs provide alternative modes of communication and foreign language interpreters as needed. The CILs will include services provided in quarterly reports to the SILC, and Centers will submit communication needs met by CIL personnel for individuals with significant disabilities such as manual communication, American Sign Language or Deaf interpreting, nonverbal communications devices, Braille, audio tapes, or in native languages.

- 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.

To be included in quarterly reports to the SILC, CILs will submit a program of staff development for all positions involved in providing and or administering IL services. The program will include any trainings that will improve the skill level of staff in providing IL services, including knowledge and practice in the IL philosophy. To be included in the 704 and SILC and CIL quarterly reports.

- 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.

All CIL members take affirmative action to advance in employment qualified individuals with disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under Section 503 of the Act.

#### 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 OMB fiscal and accounting requirements.

All centers maintain strict checks and balances on all funds received from the Administration on Community Living and all grantors. Through the use of an accounting program such as QuickBooks and an outside accountant and annual audit where required, books are monitored for appropriate and ethical use of funds.

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

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

All centers submit the required reports, documentation and fiscal audits as necessary and in accordance with regulations.

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

All centers submit the required reports, documentation and fiscal audits as necessary and in accordance with regulations.

- 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.

All centers submit the required reports, documentation and fiscal audits as necessary and in accordance with regulations.

#### 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.

Centers provide Information and Referral to anyone asking for this service without regard to any bias. Independent Living services are provided to any individual stating or self-declaring a significant disability.

- Ability of any individual to seek information about IL services under these programs and to request referral to other services and programs for individuals with significant disabilities.

Centers provide Information and Referral to anyone asking for this service without regard to any bias. Independent Living services are provided to any individual stating or self-declaring a significant disability.

- 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.

Centers provide Information and Referral to anyone asking for this service without regard to any bias. Independent Living services are provided to any individual stating or self-declaring a significant disability.

- 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.

Centers provide Information and Referral to anyone asking for this service without regard to any bias. Independent Living services are provided to any individual stating or self-declaring a significant disability.

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

Centers provide Information and Referral to anyone asking for this service without regard to any bias. Independent Living services are provided to any individual stating or self-declaring a significant disability.

#### 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.

All centers for independent living specialists offer and assist with the implementation of Independent Living plans as requested by consumers, additionally working with consumers with waivers to ascertain that desired goals and steps to achieve them are in place. Assistance is

provided if needed. Centers will continue to ensure that waivers and plans are signed and placed in the consumer's file.

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.

All centers provide CAP information to their consumers. Some centers include CAP information on their application for eligibility. CAP posters are also posted in all CIL offices and referrals are made as needed.

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.

All centers have established strict guidelines and procedures to ensure the confidentiality of all consumer information.

**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

Goal(s) and the related Objective(s) from Section 1	Method that will be used to evaluate
<p><b>Goal 1: Tennesseans have an awareness of resources available that support Independent Living for people with disabilities.</b></p> <p><b>Goal 2: Independent Living Services Network builds capacity and sustains expansions.</b></p> <p><b>Goal 3: Tennesseans with disabilities have access to the community-based resources they need</b></p>	<p>Strategies for monitoring and evaluating objectives in the SPIL work plan include the following:</p> <ol style="list-style-type: none"> <li>1. Review the SPIL at each TN SILC meeting and evaluate whether timelines are being met: <ul style="list-style-type: none"> <li>• If action steps and/or objectives have not been accomplished, analyze why and determine whether adjustments need to be made.</li> </ul> </li> <li>2. Review consumer satisfaction surveys</li> </ol>

	<p>results/report.</p> <ol style="list-style-type: none"><li>3. Review the 704 reports from all TN CILS listed in the SPIL.</li><li>4. Review ACL and DSE Site Review reports of CILS when available.</li><li>5. Work with TN CILs to determine how data will be gathered</li></ol>
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**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)

N/A