

**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 2008-2010

Effective Date: October 1, 2007

PART I: Assurances

State of: DELAWARE

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 **Delaware Division of Vocational Rehabilitation** . 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 **Delaware Division for the Visually Impaired**. 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 **Delaware SILC**. 34 CFR 364.21(a)
- 1.4 The DSU and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the SPIL. 34 CFR 76.104(a)(7); 34 CFR 364.20(c) and (d)
- 1.5 The DSU, and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, may legally carry out each provision of the plan and will comply with all applicable Federal statutes and regulations in effect with respect to the three-year period it receives funding under the SPIL. 34 CFR 76.104; 34 CFR 80.11(c)
- 1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law. 34 CFR 76.104(a)(4) and (8)
- 1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is **Andrea Guest, Director, Division of Vocational Rehabilitation** and **Cynthia B. Lovell, Director, Division for the Visually Impaired** 34 CFR 76.104(a)(5) and (6)

Section 2: SPIL Development

- 2.1 The plan shall be reviewed and revised not less than once every three years, to ensure the existence of appropriate planning, financial support and coordination, and other assistance to appropriately address, on a statewide and comprehensive basis, the needs in the State for:
- The provision of State independent living services;
 - The development and support of a statewide network of centers for independent living; and
 - Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities. *34 CFR 364.20(f)*
- 2.2 The DSU and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan. *34 CFR 364.20(g)(1)*
- 2.3 The DSU and SILC establish and maintain a written description of procedures for conducting public meetings in accordance with the following requirements. The DSU and SILC shall provide:
- appropriate and sufficient notice of the public meetings (that is, at least 30 days prior to the public meeting through various media available to the general public, such as newspapers and public service announcements, and through specific contacts with appropriate constituency groups and organizations identified by the DSU and SILC);
 - reasonable accommodation to individuals with disabilities who rely on alternative modes of communication in the conduct of the public meetings, including providing sign language interpreters and audio-loops; and
 - public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication. *34 CFR 364.20(g)(2)*
- 2.4 At the public meetings to develop the State plan, the DSU and SILC identify those provisions in the SPIL that are State-imposed requirements beyond what would be required to comply with the regulations in 34 CFR parts 364, 365, 366, and 367. *34 CFR 364.20(h)*
- 2.5 The DSU will seek to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under a project funded under chapter 2 of title VII of the Act and that the DSU determines to be effective. *34 CFR 364.28*

2.6 The DSU and SILC actively consult, as appropriate, in the development of the State plan with the director of the Client Assistance Program (CAP) authorized under section 112 of the Act. *34 CFR 364.20(e)*

Section 3: Independent Living Services

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

3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary. *34 CFR 364.43(c)*

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

- the availability of the CAP authorized by section 112 of the Act;
- the purposes of the services provided under the CAP; and
- how to contact the CAP. *34 CFR 364.30*

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

Section 4: Eligibility

4.1 Any individual with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and CIL programs authorized under chapter 1 of title VII of the Act. Any individual may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate. The determination of an individual's eligibility for IL services under the SILS and CIL programs meets the requirements of 34 CFR 364.51. *34 CFR 364.40(a), (b) and (c)*

4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services. *34 CFR 364.41(a)*

4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services. *34 CFR 364.41(b)*

Section 5: Staffing Requirements

- 5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. *34 CFR 364.23(a)*
- 5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:
- with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille or audio tapes, and who apply for or receive IL services under title VII of the Act; and
 - in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act. *34 CFR 364.23(b)*
- 5.3 Service providers establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development programs emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy. *34 CFR 364.24*
- 5.4 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will take affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act. *34 CFR 364.31*

Section 6: Fiscal Control and Fund Accounting

- 6.1 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will comply with applicable EDGAR fiscal and accounting requirements and will adopt those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for those funds. *34 CFR 364.34*

Section 7: Recordkeeping, Access and Reporting

- 7.1 In addition to complying with applicable EDGAR recordkeeping requirements, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain records that fully disclose and document:
- the amount and disposition by the recipient of that financial assistance;
 - The total cost of the project or undertaking in connection with which the financial assistance is given or used;
 - the amount of that portion of the cost of the project or undertaking supplied by other sources;
 - compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
 - other information that the Commissioner determines to be appropriate to facilitate an effective audit. *34 CFR 364.35(a) and (b)*

7.2 With respect to the records that are required by 34 CFR 364.35, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate. *34 CFR 364.36*

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. *34 CFR 364.37*

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

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

Section 9: Signatures

After having carefully reviewed all of the assurances in sections 1 - 8 of this SPIL, the undersigned hereby affirm that the **State of Delaware** is in compliance and will remain in compliance with the aforementioned assurances during **2008-2010**.

The effective date of this SPIL is **October 1, 2007**

Christine Trincia /s/ 6/25/07
SIGNATURE OF INTERIM SILC CHAIRPERSON DATE

Christine Trincia, Acting Chairperson
NAME OF INTERIM SILC CHAIRPERSON

Andrea Guest /s/ 6/26/07
SIGNATURE OF DSU DIRECTOR DATE

Andrea Guest, Director
NAME AND TITLE OF DSU DIRECTOR

Cynthia B. Lovell /s/ 6/26/07
SIGNATURE OF DIRECTOR OF THE SEPARATE DATE
STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

Cynthia B. Lovell, Director
NAME AND TITLE OF THE DIRECTOR OF THE
SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

Part II: Narrative

Section 1: Goals, Objectives and Activities

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

The SILC has four primary activities that guide IL services in Delaware. They are: 1) IL services, 2) Outreach, 3) Public Policy/Advocacy, and 4) SILC Development. Each of these activities tie into the nine objectives listed in Section 1.2.

The majority of SILC resources are used to provide IL services to the Delaware disability community. During the upcoming SPIL period, the SILC will continue to partner with both of the Designated State Units (DSU), the Division of Vocational Rehabilitation (DVR) and the Division for the Visually Impaired (DVI), to provide IL services. The Division of Vocational Rehabilitation anticipates serving 150 applicants with significant disabilities annually and close 50-60 cases as having benefited from these services during each fiscal year. The Division for the Visually Impaired will provide services to over 175 individuals, ages 18 to 54, in activities of daily living, low vision, and other areas of support. The SILC, DVR, and DVI will also seek ways to work with other organizations that provide IL services in Delaware. This directly relates to:

Objective 1.0: Independent Living Services will be provided by the Designated State Units through September 30, 2010

Outreach: Ensuring access and awareness of services is an important duty of the SILC. Within the dynamics of our state, we will continue to participate in health fairs, media campaigns, and secure additional outlets to get the word out about the IL philosophy, IL services, and disability rights/etiquette. Each SILC member has a responsibility to participate in education/outreach efforts on local, state, and national levels. The SILC will, at a minimum, participate in 5 outreach activities annually. The SILC will work with available resources to determine the need for a website or other avenues that have proven successful in reaching our targeted populations. This directly relates to:

Objective 2.0: The SILC will encourage best practices for the SILC, training, peer support, and advocacy through September 30, 2010.

Objective 6.0: The SILC will serve as a resource for culturally diverse people with disabilities in individual and systems advocacy through September 30, 2010.

Objective 8.0: The SILC will continue outreach initiatives to under-represented populations in the state to promote the IL philosophy and encourage participation in IL programs through September 30, 2010.

Public Policy & Advocacy/Partnerships/Collaboration: The SILC realizes the value of effective partnerships. During the SPIL period, the SILC will continue to build relationships with organizations

that are working on similar issues. Specifically, the SILC will advocate on transportation issues, housing, emergency preparedness, and public policy issues. The SILC will monitor the activities through the participation of its membership in policy and advocacy through the related objectives listed below:

Objective 3.0: The SILC will collaborate with the Governor's Commission on Community Based Alternatives for Persons with Disabilities to conduct a statewide needs assessment and implement its findings through September 30, 2010.

Objective 4.0: The SILC will use the statewide needs assessment as a resource to develop a visionary strategic plan through September 30, 2010.

Objective 7.0: The CILs and the SILC will explore the availability of local training on housing and other relative topics that promote the Independent Living philosophy through September 30, 2010.

SILC Development:

The Delaware SILC has experienced a tremendous amount of turnover and several members have experienced several life changing events during the current SPIL period. We have several new members on the SILC and some members who need to be re-acclimated to the SILC. The SILC strongly feels that membership development is a priority. The SILC will work on the following activities to ensure achievement of this goal:

SILC and IL orientation held as needed but at least annually to ensure members are well-informed and charged to be active members.

The SILC Chair will appoint all members to one or more sub-committees to ensure all members are active and the work is evenly distributed.

SILC members will be encouraged to attend training, conferences, and public forums to enhance comprehensive knowledge about current events and IL.

Guest speakers will be secured for SILC meetings to provide additional community resources and information.

Participation in CIL workshops will be promoted to the members and their network to promote IL philosophy.

The objectives that relate to SILC Development are:

Objective 5.0: The SILC will continue to educate and maintain professional growth of SILC members through ongoing training regarding national trends in IL philosophy and activities and will pursue active recruitment of new members through September 30, 2010.

Objective 9.0: The SILC will continue to seek new partnerships and promote active participation by members on committees to advocate for systems change and to promote independent living philosophy and services to organizations in the state through September 30, 2010

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

Objectives include, but are not limited to:

- peer support
- self help
- self-determination
- equal access
- individual and systems advocacy
- empowerment and independence of individuals with significant disabilities
- to promote leadership within the disability community
- independence by providing guidance to state agencies and community partners.

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

The following objectives will be pursued over the next three-year period:

Objective 1.0: Independent Living Services will be provided by the Designated State Units through September 30, 2010.

Objective 2.0: The SILC will encourage best practices for the SILC, training, peer support, and advocacy through September 30, 2010.

Objective 3.0: The SILC will collaborate with the Governor's Commission on Community Based Alternatives for Persons with Disabilities to conduct a statewide needs assessment and implement its findings through September 30, 2010.

Objective 4.0: The SILC will use the statewide needs assessment as a resource to develop a visionary strategic plan through September 30, 2010.

Objective 5.0: The SILC will continue to educate and maintain professional growth of SILC members through ongoing training and national trends in IL philosophy and pursue active recruitment of new members through September 30, 2010.

Objective 6.0: The SILC will serve as a resource for culturally diverse people with disabilities in individual and systems advocacy through September 30, 2010.

Objective 7.0: The CILs and the SILC will explore the availability of local training on housing and other relative topics that promote the Independent Living philosophy through September 30, 2010.

Objective 8.0: The SILC will continue outreach initiatives to under represented populations in the state

to promote the IL philosophy and encourage participation in IL programs through September 30, 2010.

Objective 9.0: The SILC will continue to seek new partnerships and promote active participation on committees to advocate for systems change such as legislative, media, administrative, and disability related issues that continue to promote independent living philosophy and services to organizations in the state through September 30, 2010.

1.2B Outreach

DVI, DVR, and the Network of Centers have staff responsible for public relations and outreach efforts. DVR, DVI and the CILs have developed marketing plans that will promote the agencies in four ways. They include establishing interactive and accessible web-sites, developing more collaboration with like agencies in order to cross-promote programs, enhancing outreach efforts to engage underrepresented populations, and eliciting more referrals from the community to promote services. The SILC and CILs will assist these staff members in enhancing community awareness of how individuals with disabilities can be fully integrated into society.

The SILC, DVR, and DVI are committed to promoting the participation of traditionally underserved individuals from minority backgrounds and groups in all aspects of independent living services and the independent living movement. The current and previous State Plans led to substantial progress in serving a broader range of culturally diverse communities in both urban and rural geographic areas of Delaware. IRI in Sussex County was established to address needs specific to minority groups, such as Native American, Hispanics, and Migrant workers. The Center in Sussex County delivers independent living services to migrant farm workers in an isolated rural area, Nanticoke Indians, and in a bilingual urban community.

Title VII, Part B funds are made available for targeted outreach projects. Some specific examples include the revision and distribution of the IL brochure that is available in English and Spanish, participation in many health fairs, and quarterly newsletters and newspaper advertisements. These model programs can be replicated through best practice exchanges between CILs, contingent upon the availability of additional resources.

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

1.3A Financial Plan Tables

Year 1

Sources	Approximate Funding Amounts and Uses			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				

Chapter 1, Part B	\$39,000	\$266,277		
Chapter 1, Part C			\$784,879	
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal Funds				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other				
Non-Federal Funds				
State Funds	43,126			
Other				

Year 2

Sources	<u>Approximate Funding Amounts and Uses</u>			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				
Chapter 1, Part B	\$39,000	\$266,277		
Chapter 1, Part C			\$784,879.00	
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				

Other Federal Funds				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other				
Non-Federal Funds				
State Funds	43,126			
Other				

Year 3

Sources	Approximate Funding Amounts and Uses			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				
Chapter 1, Part B	\$39,000	\$266,277		
Chapter 1, Part C			\$784,879.00	
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal Funds				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other				
Non-Federal Funds				
State Funds	43,126			
Other				

1.3B Financial Plan Narratives

1.3B(1) SPIL objectives

The majority of Part B resources will be used for direct services to consumers at a cost of \$798,832 over three years.

DVR plans to use \$679,008 over three years to administer and provide IL services to individuals with significant disabilities. These funds will be used for projects such as home modifications, stair lifts, vertical lifts, assistive technology devices, and van modifications, etc.

DVI plans to use \$119,824 over three years to provide IL services to individuals with significant disabilities in the areas of low vision devices, training, peer support counseling, exams, outreach and interpreters.

The Delaware SILC will review studies, analyses, and develop model policies and procedures. The Delaware SILC will demonstrate ways to expand and improve IL services and present findings and recommendations to Federal, State, and local policy makers to enhance IL services. Training continues to be a major objective of the SILC at this time. Support will be expended over the next three years to educate SILC members on local and national issues through training in state and several regional and national events and conferences.

1.3B(2) Efforts to coordinate Federal and State funding for centers and IL services

In Delaware, people with disabilities need more consumer control. Organizations working with people with disabilities may apply for monies allocated from the SPIL resource plan over three years to provide support to the disability community. The activities include: advocacy, peer support, information and referral and IL skills training. These organizations will provide a report of the activities at scheduled SILC meetings. The SILC will monitor the activities of the organizations and provide feedback as appropriate. When possible the disability organizations will coordinate activities that will sufficiently cover geographic areas and all disabilities.

1.3B(3) In-Kind Resources

The Network of Centers will provide in-kind resources to the SILC in areas such as hosting SILC meetings, teleconferencing, and copying documents and materials.

1.3B(4) Additional information about the financial plan

The SILC is making a significant change in the way that it is allocating its resources. All parties understand that amendments may be required.

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

1.4A SPIL Objectives

The SILC provides guidance for the development and expansion of Independent Living (IL) programs

and services on a statewide basis. The SILC continues to promote a philosophy of consumer driven Independent Living services and a public policy agenda that results in systemic change.

1.4B SPIL objectives incorporate the priorities and objectives established by centers for independent living

The SILC, Network of Centers, and the DSUs were active participants in the development of Delaware's State Plan. The CIL Directors attended plan development sessions and reviewed the SPIL.

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

In the spirit of cooperation and coordination the members on the SILC, CILs, and DSU sit on many other councils, boards, and committees. This gives the SILC the opportunity to respond quickly to IL issues in the State.

The SILC, DVR and the Division for Aging and Adults with Physical Disabilities (DSAAPD) partner in a cost sharing program. DSAAPD has entered into an agreement with the DVR to provide home modifications and assistive technology for their clients. This Project management helps streamline services for home modification and assistive technology. It also puts more money into the funding stream which helps clients and consumers receive services they may not receive because of lack of funding otherwise.

Both DSU liaisons are Advisory Board Members of the Delaware Assistive Technology Initiative (DATI), whose primary goals are systems change and improving public awareness and access to information related to assistive technology. In addition, DATI provides training on available technology. Both DVR and DVI refer consumers to DATI for technological assistance and support and/or guidance. This has always been a healthy relationship and will continue to grow stronger with the Low Interest Loan Program and the Tele-work program.

DATI had a unique opportunity to compete for federal funding. DATI had the potential to launch a coordinated, efficient, assistive device recycling and reuse effort in the First State. Many stakeholders have dreamed about the benefits of such a program for years but felt thwarted by a lack of resources. Collective organizations came together to submit a proposal titled, "Delaware Recycles and Reuses Assistive Technology". The Stakeholder Consortium was awarded a three-year grant from the U. S. Department of Education, Rehabilitation Services Administration, to help bring the collective vision to reality. The consortium continues to be in the information gathering, planning and development stage but diligently working towards implementation. The ultimate goal is to make equipment reutilization an efficient, cost-effective, and safe alternative for Delawareans with disabilities who need assistive devices but cannot afford them.

The SILC has determined that Disaster Preparedness is an important initiative. The SILC will assess Delaware's Disaster Preparedness Plan and coordinate with the appropriate agencies, Delaware

Emergency Management Agency and the Division of Public Health, to ensure that people with disabilities' needs are included. In addition, the SILC will sponsor Disaster Preparedness training for people with disabilities and serve as a conduit for disaster preparedness.

The State of Delaware has been notified that it will receive a federal grant under Money Follows the Person and has approved State matching funds. The SILC is advocating for the matching funds and will continue to actively advocate for the implementation of Money Follows the Person, with or without Federal dollars, so that people can move from institutional settings to home or community-based settings.

Delaware houses branches of the military and a Veteran's home. With the return of wounded veterans, the SILC recognizes the importance of assuring their independent living needs are met. The SILC will work with service providers, especially the Veteran's home, to determine independent living services and resources.

1.6 Coordination of Services – 34 CFR 364.27

Delaware's small size lends to its ability to maximize coordination between agencies and organizations and not duplicate service provision. There is a great deal of coordination between the SILC and many State agencies, non-profit organizations, and consumers. For example, the SILC, the Division of Aging and Adults with Physical Disabilities, and a few other organizations have agreements with the SILC to share funds to provide services such as home modifications, assistive technology, vehicle modification assessment and services.

The SPIL addresses issues with special education, developmental disabilities, mental health, and other important topics through cross-participation on councils, boards, and committees throughout Delaware. The members and ex-officio members of the SILC and representatives of the CILs sit on many other councils, boards, and committees to stay abreast of related issues facing the disability community as a whole, bringing the information back to the SILC through individual reports. Participation also reduces duplication of effort among the organizations. Committees on which IL representatives sit include:

- Division of Substance Abuse and Mental Health representative on the Sub-Committee of Coalition On Deaf and Hard of Hearing Equality
- First State Community Action for the Mentally Ill
- Chairperson for State Rehabilitation Council for the Visually Impaired
- Independent Living Advisory Board Member
- DEXSTA Federal Credit Union Board Member
- Member of the Delaware Assistive Technology Advisory Board
- Member of the Library for the Blind and Physically Handicapped advisory council
- National Federation of the Blind of Delaware
- Governors Committee on Employment for Persons with Disabilities
- Advisory Council Assistive Technology Act
- National Council on Independent Living, Assistive Technology Sub-committee
- PAIR (Protection for Advocacy and Individual Rights) Advisory Council

- Canine Partners for Life
- Stakeholders group for AT Low Interest Loan Program
- Governors Commission for Community Based Alternatives for Persons with Disabilities (GCCBAP)
 - GCCBAP Committee on Housing
 - Commissions Committee on Money Follows the Person, Health Care and Assessment
- State Council for Persons with Disabilities
 - SCPD Sub-committee on Housing
 - SCPD Sub-committee on Policy and Law
- Elderly and Disabled Transit Advisory Committee
- Fair Housing Task Force (under the Human Relations Commission.)
- ADAPT (American Disabled for Attendant Programs Today) Delaware
- Delaware Emergency Preparedness for Person's With Disabilities
- Medical Care Advisory Committee
- Center for Disability Studies Advisory Committee
- Developmental Disabilities Council (DDC)
 - Executive Committee
 - Adult Issues Committee
 - Partners Oversight Committee
- Access Wilmington
- DelARF (Delaware Association of Rehabilitation Facilities) Physical Disabilities Commission
- Goodwill Industries of Delaware
- President's Committee on Employment of People with Disabilities
- Delaware's Disability Awareness Program (DAP) in Delaware schools
- Easter Seals
- Architectural Accessibility Board, State of Delaware
- National Council on Independent Living
- Client Assistance Program
- State Rehabilitation Council Member (General)
- United We Ride Member
- Governors Advisory Council for Exceptional Citizens
- Committee for Delaware's Annual Disability Ball
- Treasurer for Hockessin Glen Community Association

At each SILC meeting, members report on the activities of the other organizations that affect independent living. Members communicate with other agencies by giving input while representing the SILC on some of these other Boards, Councils and Committees. This provides the SILC the opportunity to be informed and connected. The ex-officio SILC representative from the Division for the Visually Impaired also oversees the Chapter 2 OIB program and reports at the SILC meetings and receives feedback regarding the services provided by Division for the Visually Impaired.

During the past SPIL period, the SILC has started to network with agencies that provide transportation,

housing, health, and special education services. Other activities include:

- Inviting DART First State (Delaware's Public and disabled transportation corporation) to our meetings to discuss issues and increase awareness. This occurred both at SILC and Independent Living Advisory Committee meetings. Development of this relationship will continue during the SPIL period.
- The CILS in Delaware continuously work with local and state housing authorities to ensure people with disabilities have access to housing and understanding the procedures. Current events are shared with members of the SILC. A guest from the housing authority will be invited to a SILC meeting/training.
- Comprehensive Workshops have been developed by the SILC as an orientation for Developmental Disability Case Managers. These workshops are held annually and will continue through the period.
- The Division of Public Health is one of the sister agencies of DVI. They both, along with the Division of Developmental Disability Services and nine other agencies, comprise our state's health and social services umbrella. The administration of all 12 divisions meets on a regular basis and share information and resources. This information is shared within the agencies and related topics are shared with the SILC. In addition, we work with several public health programs to promote awareness and ensure access to needed care (i.e. diabetes, vaccines, and emergency preparedness).

Both DSU's have separate VR programs that work with transition students and partner with special education programs. Internally, VR identifies cases that are not employment or education related and refers to IL for services or cost-sharing.

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

During the SPIL period, the Division for the Visually Impaired's Independent Living Services for Older Individuals who are Blind will focus on two, new approaches: 1) Group training/workshops and 2) Professional certification of the Senior Rehabilitation Instructor for the Visually Impaired who provide services to the visually impaired.

Group Training: Traditionally, consumers have received IL services in their homes. With an emphasis on peer support, limited resources, and a waiting list for services, DVI will pilot various group training opportunities throughout the state. DVI will seek to partner with community resources to launch this service in a variety of local service areas and at DVI locations. The expected outcome is to: 1) increase peer opportunities and networking, 2) reduce the waiting time for services, 3) increase outreach, and 4) increase awareness and sensitivity of visual impairments. Consumer feedback suggests topics in communication skills, self-care, and advocacy will be most beneficial.

Historically, DVI has funded professionally facilitated support groups. A new approach is to ensure the groups are peer facilitated. DVI will partner with the SILC, CILS, and other agencies that provide support group services to transition the groups to be peer led. DVI will continue to serve as a resource

to consumers.

Certification of Senior Rehabilitation Therapist for the Visually Impaired: Nationally, the vision rehabilitation field made significant steps to strengthen the bonds of the professionals who serve the visually impaired community. As a result of our strategic plan, consumer feedback, and national initiatives, the Division for the Visually Impaired recognized the importance of intense training and certification of vision rehabilitation professionals and established this as a priority. Intense training is needed to improve knowledge, skills, and abilities to serve the visually impaired community.

Historically, minimal training was received and limited direct instruction had been provided to clients. DVI strongly feels certification as a Vision Rehabilitation Therapist will directly impact the successful achievement of IL goals/outcomes and foster independence. All of the service personnel will receive certification during the SPIL period.

This will programmatically change service provision. In the past, the incumbents did not have this level of knowledge, technical skills or training. In addition, we have not been attracting certified personnel in this current classification. This initiative will ensure consistency in services being provided by vision rehabilitation personnel.

There are many advantages to securing and maintaining certification. Some of the benefits of certification include:

- Certification assures consumers that services are provided by professionals who have met national standards and that these professionals have the basic knowledge and skills required to provide services that will be more likely to result in reaching the consumers' goals safely and effectively.
- Certification attests to the individual's knowledge and skills deemed necessary to the field of practice as delineated by the profession.
- Certification attests that the individual has met basic and ongoing requirements of professional ethical practice.
- Certification conveys a sense of pride and accomplishment in the profession.
- Certification commands the respect of other professionals who also have stringent standards for professional practice.
- Certification is likely to result in more respect from peers.
- Certification is more likely to protect the provider in litigation as lawyers, judges, and jury members understand that a credentialed professional has taken the extra step to prepare them self for practice.
- Certification provides a mechanism for self-study during the recertification process.
- Certification ensures that the professional's credentials are recognized nationally and is the single best way to begin a process of developing national standardization and acceptable levels of service.

For those individuals with visual impairments, eligibility for independent living services is determined by the examining physician under the following categories:

- Total Blindness- no light perception

- Legal Blindness- 20/200 or worse with correction or a field loss of 20 degrees or less
- Severely visually impaired- 20/70 or worse with correction.
- Visually ineligible- the person’s acuity is not within the above listed categories or does not have a field restriction.

These visual categories are established by the Delaware Code Title 13, Section 2101 and Title 13, Section 2107. The eye report form requests general demographic information such as name, date of birth, address, social security number for identification and statistical purposes only. Religion, sex, national origin, gender, color, or creed is not required on the eye report form nor does it play a role in determining eligibility. Due to the nature of the program, services are primarily provided in the consumer’s home or community which is also governed by the Delaware Code. In situations where the consumer is not a Delaware resident, DVI works with the agency that provides services to the blind and visually impaired in the respective area to ensure their IL needs are met.

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

Table 2.1A: Independent living services	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/ grants)
Core Independent Living Services, as follows:			
- Information and referral	DSU	N/A	CIL
- IL skills training	DSU	N/A	CIL
- Peer counseling	N/A	DSU	CIL
- Individual and systems advocacy	N/A	N/A	CIL
Counseling services, including psychological, psychotherapeutic, and related services	DSU	N/A	N/A
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)	DSU	N/A	CIL
Rehabilitation technology	DSU	N/A	N/A
Mobility training	DSU	N/A	N/A

Table 2.1A: Independent living services	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/grants)
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	DSU	DSU	N/A
Personal assistance services, including attendant care and the training of personnel providing such services	N/A	N/A	N/A
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	DSU	DSU	CIL
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	DSU	N/A	CIL
Education and training necessary for living in the community and participating in community activities	DSU	N/A	CIL
Supported living	N/A	N/A	N/A
Transportation, including referral and assistance for such transportation	DSU	N/A	CIL
Physical rehabilitation	N/A	N/A	N/A
Therapeutic treatment	N/A	N/A	N/A
Provision of needed prostheses and other appliances and devices	DSU	N/A	N/A
Individual and group social and recreational services	N/A	N/A	CIL
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	N/A	N/A	N/A
Services for children with significant disabilities	N/A	N/A	N/A
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	DSU	N/A	CIL
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	DSU	N/A	CIL

Table 2.1A: Independent living services	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/grants)
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	DSU	N/A	CIL
Other necessary services not inconsistent with the Act	DSU	N/A	CIL

2.1B. Service Provision Priorities

The Delaware SILC has experienced a large amount of turnover and is in the process of restructuring. Therefore, it is a priority to educate and foster professional growth of SILC members through training both locally and nationally.

Money Follows the Person is a service provision priority for Delaware. The SILC feels that community integration is an intricate part of IL services.

Establishing services for the deaf and hard of hearing population continue to be a priority. The Network of CILs continue to address this need.

DVI Services

This section describes DVI’s plans for providing independent living services to individuals who are legally blind and severely visually impaired. DVI promotes a philosophy of independent living; including consumer control, peer support, self-help, self-determination, equal access, and individual and systems advocacy, in order to maximize the leadership, empowerment, independence, and productivity of individuals with visual impairments and their integration and full inclusion into the mainstream of society by:

1. Expanding and improving the provision of independent living services through strategic initiatives, creativity in programming and continuing education;
2. Supporting the network of CILs through collaborative partnerships;
3. Enhancing working relationships with like organizations (i.e., other state agencies and non-profit organizations), rehabilitation service programs, CILs, SILC, supportive employment programs, Client Assistance Programs (CAPs), and other programs funded under the Rehabilitation Act, and through other Federal and non-Federal sources.

In collaboration with the CILs and the SILC, DVI will continue to explore further opportunities for the provision of the following independent living services for individuals who are legally blind and severely

visually impaired:

DVI Provides:

- Orientation and mobility training
- Rehabilitation skills training;
- Low vision examinations and devices;
- Adaptive equipment in conjunction with orientation
- Mobility and rehabilitation teaching
- Information and referral; assistive technology evaluations and training
- Supportive services
- Interpreter services upon request to enable an individual to access needed independent living services

The Division of Vocational Rehabilitation

Within DVR, IL services are provided to eligible individuals to enable them to obtain and/or maintain a personal level of independence, within their families or communities, or to continue in employment.

The Division of Vocational Rehabilitation IL program will provide:

Independent Living Services: The philosophy of the IL program is to promote self-help and self-determination. In addition to all of the independent living "core" services, the program will offer services in the areas listed below:

- Counseling Services
- Services related to securing housing and home modifications for individuals
- Rehabilitation Technology
- Services and training for individuals with cognitive and sensory disabilities
- Personal assistance services via referral to the Division of Services for Aging and Adults with Physical Disabilities

- Survey and Directories through involvement with other initiatives
- Consumer information programs on rehabilitation and IL services available under the Act
- Education and training necessary for living in the community and participating in community activities
- Transportation services in conjunction with other services
- Provision of needed prostheses and other appliances and devices
- Access to group counseling or support groups
- Community awareness programs to enhance the understanding and integration into society of individuals with disabilities
- Other services as necessary and not inconsistent with the Act.

Center for Independent Living services

Independent Resources, Inc. (IRI) and Freedom Center for Independent Living, Inc (FCIL) are Delaware's Centers for Independent Living. Each office provides services that consumers consider critical in gaining control over their lives; services they feel will enable them to function in the community of their own choosing. The organizations foster leadership among people with disabilities and is committed to full implementation and enforcement of both human and civil rights by and on behalf of people with disabilities. The Centers also act as a resource for educating the public as well as policy makers regarding issues affecting people with disabilities.

The Centers offer four services: Advocacy, Information and Referral, Peer Support/Peer Counseling and Independent Living Skills Training:

- Advocacy

CILS provide two kinds of advocacy: (1) Self Advocacy - which involves staff working with persons with disabilities, teaching them how to go about obtaining necessary support services from other agencies in the community; and (2) Community or Systems Advocacy - which involves staff, board members and volunteers initiating activities to make changes in the community that make it easier for persons with disabilities to better access needed services.

- Information and Referral

CILS maintains information on availability in the community of accessible housing, transportation and other services. An extensive network of contacts is available to assist staff in accessing needed

information or make appropriate referrals.

- Peer Support/Peer Counseling

Peer support services offer a consumer the opportunity to work with another person with a disability to explore options, make informed decisions, and achieve increased self-control over his/her life.

- Independent Living Skills Training

CILS offer instruction to help people with disabilities gain skills that will enable them to live more independently. This instruction is offered on a one-to-one basis when possible; course curricula are dependent on what the individual feels he/she needs most to be independent.

These activities are the essence of the IL program in Delaware and further the objectives in the SPIL.

2.1C State Allowance for service providers to charge

N/A

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

2.2A Grants and contractual agreements

Delaware is fortunate to have a private-non profit agency that provides recreation and social activities to the blind community. The Division for the Visually Impaired and Delaware Association for the Blind have had contractual arrangements since 1987 for provision of Peer Support Services. The purpose of the Peer Support Service is to provide role models who will encourage visually impaired individuals to become as independent as possible through community services. Quarterly meetings are held to monitor and evaluate the program, evaluate consumer and program goals, evaluate and compare statistics and discuss any program concerns.

Delaware Association for the Blind provides trained peer support workers to deliver support services to consumers. The trained peer support workers telephonically contact consumers who are referred by DVI to provide support achieving their IL goals, advocacy, accessing services, and adjustment to blindness. All consumer sessions are recorded individually by the peer support worker. Consumer session reports are submitted monthly to the Peer Support Service Coordinator by the Peer Support Worker. The Peer Support Service Coordinator or her designee, types the reports and submits them to the referring DVI staff person and the Social Service Administrator. The overall responsibility for case management of individual consumer goals belongs to the referring DVI staff person. This contract is negotiated every year.

2.2B State Contract with Centers for Independent Living

N/A.

Section 3: Design for the Statewide Network of Centers

3.1 Existing Network – 34 CFR 364.25

The State currently has a network of federally funded CILs, one in each county of the state, with preexisting Title VII, Part C funds. IRI has three locations that serve all three counties. The Freedom Center operates in the Newark, New Castle, Middletown, Odessa, Townsend area of Southern New Castle County. The federally funded CILs that comprise the State of Delaware network include:

- Independent Resources, Inc. (Wilmington, New Castle County).
- Independent Resources, Inc. (Dover, Kent County).
- Independent Resources, Inc. (Sussex County).
- Freedom Center for Independent Living, Inc. (Newark and Southern New Castle County)

The federally funded CIL network is geographically dispersed throughout the State and addresses both urban and rural needs, as well as specific underserved populations. All Title VII, Part C funds continue to support only consumer-controlled organizations. Working together, CILs establish contractual or vendor relationships with other State agencies, organizations serving individuals with disabilities, and the private sector, to promote standards established within the Rehabilitation Act as amended.

The CILs are a major player in Delaware with respect to helping persons with disabilities. Outside of the four core services the network plans to continue to provide services to underserved and unserved populations including but not limited to the deaf and hard of hearing population, the homeless population and the Hispanic population.

The network of CILs will continue to work with community transition for individuals from nursing homes to the community and with the Ticket to Work program where IRI will continue to enhance their presence as a provider in the Employment Network (EN).

3.2 Expansion of Network – 34 CFR 364.25

When the Delaware SILC, DVR and DVI are informed that additional Title VII, Part C funds are available in a given fiscal year, resources will be allocated to the least funded centers at 80% and 20% to the next least funded center until all of the current centers are funded at the recommended funding level of the National Council on Independent Living and the SILC Congress of \$250,000. After all centers are fully funded, all reallocations will be split evenly among the (three) existing grants in Delaware.

3.3 Section 723 States Only – 34 CFR 364.39

3.3A Section 723 States Only

N/A

3.3B Section 723 States Only

N/A

Section 4: Designated State Unit (DSU)

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

4.1A **Administrative support services to be provided by the DSU for the SILS**

The Division of Vocational Rehabilitation and the Division for the Visually Impaired are the DSUs that are designated to receive, account for and disburse funds, and provide administrative support services for the Part B State IL services program.

The Division of Vocational Rehabilitation provides administrative support to the SILC through the services of a Program Specialist. This individual is also appointed to the Council as the ex-officio member representing the Division of Vocational Rehabilitation. Administrative services such as clerical support are also provided by the Division of Vocational Rehabilitation.

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

N/A

Section 5: Statewide Independent Living Council (SILC)

5.1 Resource plan – 34 CFR 364.21(i)

5.1A Resource plan

Delaware SILC's resource plan is detailed below for FYs 2008-2010:

Expenditures	FY 2008	FY 2009	FY 2010	3 Year Total
1. Training/Conferences	22,000	22,000	22,000	66,000
2. Meetings	600	600	600	1,800
3. In-State Travel	1,135	1,135	1,135	3,405
4. Grants/Contracts/RFP	9,431	9,431	9,431	28,293
5. Outreach	5,834	5,834	5,834	17,502
Total Budget	39,000	39,000	39,000	117,000

The SILC recognizes that there are many projects that support IL in Delaware. Therefore, near the end of the fiscal year any remaining funds from the SILC resource budget will be reallocated through grants, contracts, and requests for proposals.

5.1B SILC Resource Plan Requirements:

The Delaware Statewide Independent Living Council (SILC) has been established to coordinate the functions related to the planning, monitoring, and evaluating the State Plan for Independent Living (SPIL) as described in Section 705 of the Rehabilitation Act, as amended. The SILC will maintain a

membership that will continue to foster the efforts necessary to carry out the work of the council and be informed about independent living.

The SILC will make a conscientious effort to recruit and train individuals with disabilities and individuals with disabilities from minority groups. Council members will be expected to have a thorough knowledge and understanding of the Independent Living philosophy. The Chair and Vice–Chair must have extensive experience in the field of disability rights advocacy.

General SILC activities and statewide systems advocacy efforts will be coordinated with the Network of CILs to promote awareness throughout the State of Delaware.

The SILC, DSUs and Network of Centers will coordinate statewide media efforts to increase awareness about Independent Living philosophy, individuals with disabilities, and issues important to people with disabilities through outreach campaigns and partnerships.

The Network of Centers, SILC, and other networks serving people with disabilities will work together to develop a comprehensive advocacy agenda to enforce disability rights, address barriers to individuals with disabilities, and secure additional resources to help them carry out their mission.

The SILC scheduled public hearings throughout the state prior to the development of the SPIL. While attendance was very low; only inquiries about accessing IL services were discussed at the public hearings. Advertisement occurred in local news media, mailed to advocacy groups, advertised on websites, and posted in CILS and DSU locations throughout the State. The notice also informed interested parties of the acceptance of written comments if attendance was not possible. The SILC will continue to utilize consumer feedback and other media alternatives to increase the attendance and responses at public hearings.

The Council represents individuals and advocates from a wide variety of groups. Consumer composition includes individuals with visual impairments, learning disabilities, traumatic brain injury, physical disabilities, and a parent of an individual with a disability. Advocates represent individuals with mental health disabilities as well. Other agencies that are active council members that we collaborate with that provide services to consumers are Easter Seals, the Client Assistant Program, the Division of Vocational Rehabilitation, the Division for the Visually Impaired, the Division of Services for Aging and Adults with Physical Disabilities, Freedom Center for Independent Living, Independent Resources, Inc., and the Colonial Paralyzed Veterans. The SILC is also beginning to see more guests at its meeting than in the past which is a direct result of outreach efforts.

The Network of Centers is looking to reduce duplication of effort and making resources available for Delaware consumers. Specifically, they are working with the Center for Disabilities Studies to merge support groups and other core IL services fostering a positive relationship between the network.

The SILC posts its meetings on the Governor’s Portal. This is a state law requirement which gives great access to many. The SILC also posts meeting times and places in all of the Vocational Rehabilitation

offices 30 days prior to each meeting. The meetings are also posted in the Centers for Independent Living and when possible put in different newsletters and on other web-sites. Each member is mailed a reminder, agenda, and minutes to prepare for the semi-monthly meetings.

5.2 Establishment and Placement – 34 CFR 364.21(a)

The SILC is a freestanding organization that operates separately from any State Agency. The SILC does not have offices or facilities within any agency in the State of Delaware. The only direct contact to any agency is for the provision of expenditures.

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

Interested parties complete an application for the SILC after attending two or more meetings. The SILC body votes on applications and the Membership Committee forwards the names to the Governor's office. The membership committee ensures that the prospective appointees meet the composition requirements such as statewide cross representation in all counties in Delaware. A diverse representation of persons across disabilities and backgrounds is part of the selection criteria. These individuals also have knowledge of Centers for Independent Living and Independent Living services. Members of the SILC are appointed by the Governor. Working together with the Director of Boards, Committees and Councils of the Governor's office, appointments come through within 6 weeks of the request. The Membership Committee ensures the SILC composition remains in compliance with the Title VII regulations on an ongoing basis including ensuring that members of the SILC do not serve more than 2 consecutive three year terms.

5.4 Staffing – 34 CFR 364.21(j)

The SILC does not have staff or personnel. The members of the SILC carry out the required functions.

Within the Division of Vocational Rehabilitation, a program specialist is designated to provide staff support for the SILC. This staff person's primary duty is to serve as a resource person for the SILC and a liaison between the Council and the Division of Vocational Rehabilitation staff. In addition, clerical support is made available to the SILC by the Division of Vocational Rehabilitation. Supervision for DVR staff rests within the DSU.

The Division for the Visually Impaired's Social Service Administrator serves as a liaison between the SILC and DVI employees providing services under the IL grant. All Part B funds for the Division for the Visually Impaired are used for direct consumer services and professional development.

The DVR Program Specialist, the DVI Social Service Administrator, nor clerical staff assigned to the SILC, will not be assigned duties which would create a conflict of interest.

Section 6: Service Provider Requirements

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

The Division for the Visually Impaired has supported all of its IL personnel to obtain specialized training in Rehabilitation Therapy. The IL personnel have successfully completed the Rehabilitation Study Course sponsored by the Lighthouse and continue to work on the necessary requirements for certification as a Vision Rehabilitation Therapist. The other service providers that DVI-IL personnel refer consumers to internally are all certified or trained in areas such as orientation and mobility, vocational rehabilitation, and technology assistance.

At each SILC meeting the Center Directors report on what their Centers are doing regarding Independent Living and the services being provided. The SILC sponsors training from time to time as part of the SILC's training program. The SILC also offers to send members to training outside the state such as the SILC Congress and the National Conference on Independent Living. They also use ILRU and IL-NET as sources of training which keeps the members up to date in training and current about national issues regarding Independent Living.

DVI, DVR, and the SILC have established many partnerships and gathered several resources to provide alternative modes of communication. Some examples include interpreter pools, both language and sensory, and transcribing information in a variety of medias for IL services.

The SILC, DVR, DVI, and the Network of Centers have developed training resources for all employees that provide IL services including knowledge of and practice in the IL philosophy.

DVR, DVI, and the Network of Centers practice 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.

6.2 Fiscal Control and Fund Accounting – 34 CFR 364.34

Both DVI, DVR, and the SILC adopt fiscal control and fund accounting procedures that ensure proper disbursement and accounting of funds through the Part B program. In addition, both DSUs follow Delaware's State Accounting Requirements and EDGAR fiscal and accounting requirements.

The Network of Centers have Directors of Operations that handle their fiscal and fund accounting and human relations issues. They both follow EDGAR requirements. In addition, both CILS have independent audits

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

Both DSUs and the Network of Centers' recordkeeping practices comply with the stated regulations. All records are confidential unless an authorization for a release of information is received. Both DSUs and the Network of Centers submit annual performance and financial reports. Both DSUs and the Network of Centers will provide access to representatives for audit, examination, and compliance review purposes.

6.4 Eligibility – 34 CFR 364.40; 34 CFR 364.41

In accordance with CFR 364.40(b) any individual may seek information about Independent Living Services and may request referral to other services and programs such as other state agencies or organizations that offer services for individuals with or without disabilities. There is an established determination process of an individual's eligibility. The determination of eligibility is not based on age, color, creed, gender, national origin, race, religion or state residency, but solely on having a significant disability. All service provider contracts include these provisions pertaining to age, color, creed, gender, national origin, race, religion. Person's whom are homeless in the state and meet eligibility also may receive services. The DSU liaison to the SILC from the Division for the Visually Impaired also oversees the Chapter 2 OIB program. At SILC meetings, current events are shared and feedback is received regarding the services provided by Division for the Visually Impaired OIB program.

6.5 Independent Living Plans – 34 CFR 364.43(c)

The provision of independent living services is coordinated by DVR and DVI staff designated for independent living services or a coordinator or counselor who work individually with consumers. Independent living coordinators/counselors meet with applicants to determine eligibility for services and, if appropriate, to develop an Independent Living Plan (ILP).

Independent living services are provided in accordance with an approved ILP, which is developed jointly by the consumer and DVR/DVI independent living counselor. The ILP sets forth the consumer's independent living goal, intermediate objectives, specific services to be provided and the service providers. The ILP also contains information regarding the consumer's rights and responsibilities, the DVR and DVI appeal process, and the local Client Assistance Program (CAP). Consumers are also informed of their right to waive the development of the ILP.

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

CAP provides literature as needed to inform consumers of their services. CAP will work with the disability agencies/organizations to ensure this information is available in alternative formats.

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

DVI and DVR have internal policies and procedures to safeguard the confidentiality of all personal information including photographs and lists of names in addition to the requirements referenced above.

Section 7: Evaluation

During the first SILC meeting of each fiscal year, the SILC reviews the SPIL goals and objectives as outlined in the document. The purpose of the review is to:

1. determine which of the objectives outlined in the SPIL have been completed in an efficient

- and timely manner,
2. develop and initiate specific activities related to the completion of the remaining objectives,
 3. outline specific expenditures.

The SILC agrees to annually submit the results of both DSU's evaluation activities, including the most recent results of Title VII consumer satisfaction surveys, with the annual performance (704) report to RSA.

DIVISION OF VOCATIONAL REHABILITATION EVALUATION:

On a continual basis, the DVR Office of Independent Living (OIL) evaluates each consumer's progress toward meeting the specified goals of the consumer and their Independent Living Plan (ILP) or waiver of the ILP. Case reviews serve to ensure that timely and effective services are being provided, with the ultimate goal of providing quality services. The Program Specialist and staff do case reviews, at random, on a quarterly basis.

DVR reports to the SILC, on a quarterly basis the completion of identified goals and initiation of new programming within the IL program. The IL Program Specialist also meets regularly with the contractual providers to ensure timely and efficient service delivery and maintains regular communication with the Division Director and Deputy Director.

DVR annually sends a satisfaction survey to all consumers who are determined eligible and are closed successfully or unsuccessfully during the fiscal year. The OIL contacts consumers who were not satisfied and attempts to identify and resolve problems and issues whether individual or systemic. This gives OIL the ability to make adjustments to the program when deemed necessary.

CENTER FOR INDEPENDENT LIVING EVALUATION:

Upon the completion of services, The Freedom Center for Independent Living, Inc. and Independent Resources, Inc., both send a consumer satisfaction survey to gather consumer input and develop programs to meet the needs of the individuals served by the program.

This information is compiled and reported in the annual 704 Performance Report.

DIVISION FOR THE VISUALLY IMPAIRED PROGRAM EVALUATION:

DVI continually evaluates each consumer's progress towards meeting specified goals through quarterly case reviews between the IL Social Service Administrator and the Senior Rehabilitation Instructors and monthly interdisciplinary case reviews that include representatives from all service units. Case reviews serve to ensure that timely and effective services are being provided with the ultimate goal being personal independence of the consumer.

DVI reports, to the SILC on a quarterly basis and an internal Independent Living Advisory Committee (ILAC), the progress, completion of identified goals, and initiation of new programming within the IL

program. The IL Social Service Administrator also meets quarterly with the contractual providers to ensure timely and efficient service delivery and maintains regular communication with the Division Director and Deputy Director.

Due to the minimum return rate in the past, DVI implemented a new procedure to obtain consumer satisfaction in fiscal year 2005. With the assistance of a casual/seasonal employee, consumers are contacted telephonically to complete the survey. Surveys are provided to our consumers once services are completed. The consumer has the option, however to request the survey be mailed if preferred. This new procedure has increased the response rate.

While the response rate is higher than when were mailing the satisfaction surveys, we continue to work on innovative ways to measure satisfaction.

DVI continues to monitor national trends and information to remain abreast of innovative and efficient vision rehabilitation services.

Section 8: State-Imposed Requirements

N.A