



June 6, 2014

The Texas Association of Centers for Independent Living (TACIL) is providing stakeholder input in response to the Sunset Staff Report regarding the Department of Assistive and Rehabilitative Services (DARS). TACIL is a membership association of Centers for Independent Living (CILs), which are local, independent, nonprofit organizations and trusted resources for individuals with disabilities and families providing the four core services of information and referral, advocacy, peer support, and independent living skills training.

TACIL agrees with the issues the Sunset Commission identified and supports the recommendations Sunset provided regarding IL service delivery challenges. CILs are operated and guided by people with disabilities, many of whom have identified and removed barriers as recipients and providers. Our experiences and philosophy make our input and involvement invaluable to all processes affecting the lives of Texans with disabilities. We appreciate the Sunset Commission's engaging us and our IL network partners in identifying barriers we face today. The Commission's recommendations present opportunities for the IL network – CILs, the State Independent Living Council (SILC), TACIL, and DARS – to expand capacity to its fullest potential and increase services to individuals with disabilities so they have every opportunity to lead the lives of independence they choose.

### **Sunset Issue 3: DARS Offers Many Independent Living Services Consumers Could Easily Access Through Local Centers for Independent Living**

IL networks across the country have adopted community-based models wherein all independent living services are provided through CILs. In doing so, many states now realize more cost-effective, better-coordinated results because of CILs' community-based, consumer-focused efforts. The transition of IL services from a state-run model to a community-based model affects the very nature of how IL services are delivered. An increased number of Texans with disabilities would benefit from efficiencies gained through this change. CILs provide an array of IL services to a cross-disability population including people of all ages. Services for the consumer can begin with minimal delay, as most eligibility determinations are completed at the time of intake. Consumers would experience more timely responsiveness to their real-life needs. CILs build capacity through local collaborative agreements and subcontracts to resolve barriers, meet unmet needs and ensure effective, cost-efficient use of resources. Overall, Texans with disabilities would benefit from IL services that are more coordinated, cost-effective, and consumer-directed.

Many state IL service dollars are spent evaluating and providing assistive technologies and devices. CILs can provide easier, faster access for the consumer in evaluating and obtaining technology. The CIL-consumer partnership in evaluating technologies increases the likelihood that consumers use and benefit from what they obtain, because the process involved informed

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decision and choice. With the appropriate training, technical assistance, and financial support in capacity-building, CILs would be able to assist DARS in meeting its strategic plan initiative of increasing access to technology.

**Recommendation 3.1: Change in Statute – Define DARS’ role in the provision of independent living services as supporting and monitoring the network of centers for independent living.**

TACIL supports this recommendation. The report indicates that DARS’ role in the IL network would be to fund and evaluate services CILs provide, and provide the necessary training and technical assistance to help CILs expand their capacities to provide the full range of IL services. We agree that, with the appropriate and additional financial support, training, and technical assistance, IL services can be successfully transitioned to, and delivered through, a community-based framework that offers the greatest benefit to consumers in leading independent lives.

TACIL also supports the recommendation that DARS include, in an evaluation, activities surveying CILs regarding the services they provide as well as training and technical assistance they need to expand services and facilitate the best use of tax-supported resources for Texans with disabilities.

**Recommendation 3.2: Management Action – DARS should evaluate independent living services available in communities throughout the state.**

TACIL supports this recommendation. All parties within the IL network are vested in expanding services to underserved and unserved areas throughout the state, and participation among all parties is critical to meet this need. CILs have experience in building capacity and meeting community needs through local collaborative agreements and subcontracts, and as such should be included in development of an inventory of qualified, suitable entities that are knowledgeable of and operate under the IL philosophy.

The Sunset report indicates that DARS has no established or transparent method for evaluating the level of assistance CILs need, or how to most equitably disperse funds among them. CILs that have received state funds for some time have not been part of an evaluation using a defined approach to assess to what extent funding levels meet changing and growing needs of CILs, who have served growing numbers of Texans with disabilities while facing increasing costs of doing business. The need for IL services continues to surpass current CIL funding levels that have remained unchanged for many years. A defined approach is needed for evaluating funds that CILs have been receiving as well as funds to be redirected as per Sunset recommendations.

**Sunset Issue 5: Sunset recommends that DARS develop a mechanism to more effectively plan for, track, and evaluate performance of programs and staff.**

The Sunset report indicates that resource specialists throughout the state provide services very similar to those that CILs provide. TACIL agrees with this observation. Experiences have shown us that capacity for providing those services is significantly greater when provided by CILs.

Most resource specialists in Texas are contracted through a sign language interpreter company, whose scope is focused on providing sign language interpreting services. While these services are essential for many consumers, they do not address the scope of needs and services of the entire deaf and hard of hearing community. Moreover, the company is located in Houston, so resource specialists in many areas of the state have no local leadership or oversight.

CILs generate the capacity, synergy and provide the oversight necessary to accommodate the needs of the cross-disability populations in their communities, including of those who are deaf and hard of hearing. We recommend that resource specialists become a part of the CILs.

Thank you again for your engagement of participants throughout the IL network of Texas. We appreciate your review of our comments and consideration of our recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Kantoff". The signature is fluid and cursive, with a large initial "A" and "K".

Amy Kantoff  
Executive Director, TACIL  
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**From:** [Sunset Advisory Commission](#)  
**To:** [Cecelia Hartley](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, July 30, 2014 5:23:43 PM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, July 30, 2014 3:37 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, July 30, 2014 - 15:37

Agency: DEPARTMENT ASSISTIVE AND REHABILITATIVE SERVICES DARS

First Name: Amy

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Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

During the Sunset hearing in June, TACIL provided testimony in response to concerns regarding DARS Recommendation #3 expressed by blind services advocates. The Texas Centers for Independent Living (CILs) fully support Recommendation #3. We want to be very clear about Texas CILs' capacity and ability to serve consumers with all disabilities, including those who are blind and visually impaired. Concerns we have heard relate to staff expertise, the peer-to-peer service model, and maintaining successful consumer outcomes.

The Texas Legislature intends for DARS to combine the separate DRS and DBS divisions. The Sunset Commission calls for a single IL services program, contracted through Texas CILs. We believe this is possible within the proposed timeline, and will result in a more efficient system. The transition of IL services from a state-run model to a community-based model through CILs would serve an increased number of Texans with disabilities who would benefit from efficiencies gained through this change. CILs offer assistive technology labs that provide opportunities to learn about, use and compare assistive devices before purchase. CILs can build upon local efforts to reclaim, recycle and reuse a broad range of assistive technology devices, based on successful programs in other states. A focused, statewide effort to recycle assistive devices - and match these items with people who need them - could significantly reduce purchase of new equipment and could shorten the state-run IL services program waiting list.

By definition, a CIL is a cross-disability organization that is operated by and for people with disabilities. This means that:

- People with disabilities comprise the majority of the board of directors and staff of each CIL. This includes board members and staff who are blind and visually impaired.
- CILs serve all people with disabilities, regardless of the nature of

the disability.

- Centers for Independent Living, including those in Texas, have provided and do provide services for people who are blind and visually impaired. CILs can build capacity as needed to serve this population, as that is what they have done and continue to do to meet the needs expressed by all within the communities they serve. CIL staff are and can be as mobile as necessary to assist consumers. If staff resources are not adequate, CILs have the option to contract out for expertise.

As stated in earlier testimony, people experiencing vision loss need to learn to live independently in their homes and in their communities. Very often it is peer support from another person with a disability that is the best skilled support available. Texas CILs operate using a peer-to-peer service model. The idea of people with disabilities who support each other, share ideas and expertise, and work together to promote positive change is the basis of the Independent Living philosophy. That is the service model used by the independent living program in DBS, and we will not vary from that practice. We look forward to collaborating with DARS in formulating a strong transition plan that addresses the concerns advocates have raised.

Any Alternative or New Recommendations on This Agency: N/A

My Comment Will Be Made Public: I agree