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ARCIL, Inc.
Comment on the Sunset Staff Report on the
Department of Assistive and Rehabilitative Services
June 2014

ARCIL, Inc. is a community-based, consumer-directed, non-residential, cross-disability, private not-for-profit corporation operated by and for people with disabilities. As a Center for Independent Living, ARCIL serves a cross-disability population and people of all ages, providing the 4 core services of Information & Referral, Independent Living Skills Training, Peer Support, and Individual & Systems Advocacy. Through our offices in Austin, Round Rock and San Marcos, ARCIL assists people with disabilities in our 10-county service area to access a broad range of services and resources, include programs providing long term services and supports.

Issue 3: Independent Living Services

The Sunset Staff Report recommends transfer of the Independent Living Services program to Centers for Independent Living. Currently, DARS staff provides services in the Independent Living Services program to individuals with disabilities who are not receiving DARS Vocational Rehabilitation services. The program purchases technologies, adaptive equipment and specialized services that allow Texans with disabilities to maintain independence and avoid institutional placement.

ARCIL, Inc. supports this recommendation. Centers for Independent Living are a natural fit to provide Independent Living Services, and this type of arrangement works well in other states. Such a change would require no substantial change to the purpose of the program or eligible consumers.

As a consumer-driven organization, we make systems change recommendations based on the potential benefits to our consumers, Texans with disabilities. Transfer of ILS program services to CILs would benefit Texans with disabilities through reduced duplication, non-time limited services, better statewide coverage, and better local coordination.

Reduced Duplication

The transfer of the Independent Living Services program to Centers for Independent Living, as recommended, would make more funding available for adaptive technologies and services,

reducing time on waiting lists. The change would result in elimination of 24 FTEs, and the DRS/DBS division would be eliminated.

Many of the consumers receiving services from the ILS program are also receiving services from the local CIL, so transfer of the program would eliminate a duplicative eligibility process. As ILS program consumers gain access to services from the local CIL, they are introduced to additional services and opportunities provided by the CIL.

Non-time Limited Services

Texans with disabilities would benefit from the non-time limited service delivery process used by CILs. DARS provides ILS program services on a time-limited, with each consumer accessing the program to acquire a specific adaptive equipment item or service. Consumers are typically placed on a waiting list until ILS funding becomes available, at which time services are provided. Once the service is provided, the case is closed.

CILs provide services according to an Independent Living Plan, with non-time limited services focusing on the individual life goals of each consumer. A consumer may access one or more services from a CIL for a span of several years, or at several different times. As needs and goals change, the Independent Living Plan is modified or replaced. The CIL service delivery model does not make waiting lists go away, but it can be more responsive to real-life needs.

Statewide Coverage

Texans with disabilities would benefit from expansion of CILs in unserved and underserved areas of the state. DARS currently funds 15 CILs, with an additional 12 CILs operating with federal funding only. The scope of DARS existing contracts with CILs would increase to include ILS program services. New DARS contracts would be necessary with CILs in other areas of the state. There is at least one Texas CIL in each of the 11 HHSC state regions, so statewide coverage is possible.

As noted in the Sunset Staff Report, Texas CILs operate out of 27 locations. Our CILs have developed additional services and maintain contracts to provide services beyond our "core" service areas. Through contracts with the Texas Department of Aging & Disability Services, Texas CILs serve entire HHSC regions in provision of Relocation Assistance Services. The Social Security Administration contracts, mostly through CILs, for statewide benefits planning services.

Local Coordination

Texans with disabilities would benefit from better local coordination because CILs are embedded in local service networks. The ILS program is most efficient when operated in coordination with

other services. While DARS ILS counselors have typically done well at leveraging third-party resources, we believe we can do better because of our connectivity to the communities we serve. Texas' 27 Centers for Independent Living are locally-operated, community based organizations, each with established networks within their respective service areas. CIL staff have experience with a broad range of resources, programs and service providers, with access to local resources through personal relationships. CILs help consumers access medical equipment loan programs, volunteer-driven programs and faith-based organizations in local communities.

The primary resource for mobility equipment, communications technologies, and some rehabilitative therapies is health insurance, including private policies as well as Medicare and Medicaid. DARS ILS counselors have developed expertise at maximizing use of insurance and minimizing purchases with ILS funds – a practice Texas CILs would continue. CILs help consumers obtain eligibility, complete paperwork, appeal denials and educate providers of equipment and supplies.

The DARS ILS program purchases assistive technology for consumers – communication aids, adaptive computer technologies, etc. – that does not always get used to its full potential. Consumers have no means to try out, test, and experiment with various technologies before purchase. Texas CILs potentially provide 27 assistive technology demo sites, plus a growing capacity to provide technology training.