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Executive Director
Regina Blye

June 6, 2014

Sunset Advisory Commission
P.O. Box 13066
Austin, Texas 78711

Dear Commissioners:

The Texas State Independent Living Council (SILC) writes to provide stakeholder input after reviewing the recently released Sunset Advisory Commission Staff Report on the Department of Assistive and Rehabilitative Services (DARS). We commend the Sunset Advisory Commission staff for their thoughtful consideration of agency challenges and the creative solutions they have proposed.

DARS STAFF REPORT ISSUE 3:

The expansion of the Centers for Independent Living (CIL) network in Texas over the last several years has brought Independent Living (IL) services to previously unserved areas in Texas. As the Network has expanded, so too has the awareness of IL services. While CILs do provide additional services beyond the four core services (IL skills training, peer support, information and referral, and advocacy), the availability of some of these extra services and programs is contingent upon securing additional funding sources to support these efforts. As the Staff Report noted, the Network has excelled at creatively stretching every dollar to provide much needed services to consumers and has the capacity to expand their offerings and reach into under and unserved communities. With additional financial and technical support, we agree with the findings of the Staff Report and believe the extensive Network of both state and federally funded CILs can be a resource to the Legislature and DARS as they look for ways to streamline service delivery of Independent Living services. We encourage the Sunset Advisory Commission, the Legislature, and DARS to further utilize the capacity of the Network and the potential each Center has to provide Independent Living services to the state of Texas.

SILC is a Willing Partner in Independent Living Program Reform:

Please be assured that the SILC stands ready to provide technical assistance and support to DARS and the IL network as it adapts to new opportunities and challenges and we anticipate our continued partnership with DARS in its efforts to efficiently and effectively serve the IL community in Texas. The SILC looks

forward to the exciting opportunities presented in the Sunset Advisory Commission staff recommendations and the challenges associated with these changes. We realize that significant changes to the IL service delivery system and structure of the CIL Network will require extensive coordination with the SILC. The SILC stands ready to assist DARS and the Network in coordinating data, helping plan for changes to the evaluation system for CIL and IL services, and making adjustments to the State Plan for Independent Living. With this extensive undertaking, we also anticipate the need to work with DARS to make adjustments to the financial plans of the SILC to ensure the organization is adequately supported as it undertakes these new responsibilities.

Consideration and Timing of the State Plan for Independent Living:

As the Sunset Advisory Commission and the Legislature consider the recommendations made in the Staff Report please keep in mind the federally mandated planning activities and partners of the State Plan for Independent Living (SPIL)¹. The SILC helps shape the State Plan with DARS and the IL network across the state of Texas. In order to receive federal funds authorized by Title VII, Chapter 1 of the Rehabilitation Act of 1973, as amended, for the State Independent Living Services program and the CIL program, the state must submit a SPIL every three years. The SPIL is unique in nature in that it is developed by the SILC, the IL network, and DARS and must receive approval from both the SILC and DARS before it can be approved by the Rehabilitation Services Administration. The SPIL reports on how IL services are provided, geographic and demographic populations that are served, unserved, and underserved, but also creates a plan for the expansion of the CIL network and the services they provide. In addition to the program planning aspects of the SPIL, it also outlines the planned financial resources for these services including the use of federal Part B, Part C, SSA-VR, and State General Revenue for the IL activities over that three-year period.

It is important to note that any substantial changes of the makeup, function, and funding of the IL network will need to be reflected in the SPIL. The current SPIL covers Federal Fiscal Years 2014-2016. The drafting of the SPIL is an ongoing process and the SILC is currently collecting and analyzing the information to be included in the FFY17-19 SPIL. With the next SPIL due to RSA on July 1, 2016, changes to the IL network will need to be in the final planning stages or in place by the fall of 2015 in order for the SPIL to accurately reflect the current and planned state of IL services in Texas.

Recommendation 3.1

Equitable and Transparent Methodology for Allocating Funds to All Centers: We believe the SILC and the Network of Centers should be included in the development process of the methodology for allocating funds

¹ 34 CFR 364.2 The State plan must provide for the review and revision of the plan, at least 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— (1) Providing State IL services; (2) Developing and supporting a statewide network of centers; and (3) Working relationships between—(i) Programs providing IL services and supporting or establishing centers; and (ii) The VR program established under title I of the Act, and other programs providing services for individuals with disabilities.

for IL services to all Centers. The SILC, in its federally mandated role, is tasked with addressing the provision of state IL services, developing and supporting a statewide network of centers, and the working relationships with programs providing IL services, supporting or establishing centers, and the State's VR program within the SPIL². In addition, should the Legislature adopt Sunset's recommendations regarding the reorganization of IL services and funding, they should also include the necessary budgetary support for the CILs and the SILC to make a successful transition.

Recommendation 3.2

Active Participation From SILC and CIL Network in Reorganization: As part of the evaluation process of independent living services and the Network of Centers, it should be explicitly clear that the SILC and the Network of Centers should be active partners in this process. Suggestions on how to integrate these two partners more appropriately into this transition are as follows:

- **Survey/Evaluation/Inventory:** We believe that the SILC, with appropriate financial support, can conduct a thorough readiness review of the IL network, which should include a survey of CILs regarding services and assistance needs and an inventory of community-based entities that provide IL services.
- **Service Definitions and Outcomes:** The SILC is currently facilitating the process referenced in Rider 30 to gain consensus on interpretations of definitions of CIL-provided services and common outcomes. We agree the transition should include addressing the definitions of service and outcomes for all IL services. To ensure efforts are not duplicated, we believe that the SILC can play a valuable role in helping reconcile these two efforts to come up with a cohesive effort to accurately reflect the effort and impact of IL services in Texas.
- **Consumer Input and Outreach:** We believe that Recommendation 3.2 should include plans to include consumer and stakeholder input on the process and transition of services. In addition, there should be an extensive outreach campaign to ensure Texans with disabilities, DARS staff, and stakeholders are adequately informed of the coming and planned changes and how it will impact their services. Coordination of outreach to all of these audiences is vital to a successful transition. The SILC has extensive experience with facilitating town hall meetings and public hearings, planning conferences, and workgroup meetings. The SILC believes we are uniquely positioned to take the lead on coordination efforts for consumer input and outreach and we look forward to assisting with this process.

DARS STAFF REPORT ISSUE 5:

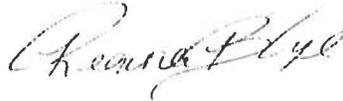
Deaf and Hard of Hearing Services: The Issue 5 Findings of the Staff Report acknowledges that the services provided out of the Office of Deaf and Hard of Hearing Services are very similar to those services provided by the Independent Living Services (ILS) program and through the Network of Centers for Independent Living. In the recommendations portion under Issue 5, it suggests that DARS reviews the services provided to those that are blind or deaf. We support this suggestion and encourage the Commission to go a step further and

² 34 CFR 364 (C)

recommend that this review be made a priority so that any changes to the program could be incorporated simultaneously with other planned changes to the ILS program and subsequent contract with the CIL Network.

We encourage the Sunset Commission to look at the SILC as partners in its efforts to address the service delivery challenges of DARS and would welcome the opportunity to be a resource to provide further information about the Independent Living network and the great work of the Centers for Independent Living. We look forward to our continued partnership with DARS and the Network of Centers and welcome changes to improve services for people with disabilities across Texas.

Sincerely,

A handwritten signature in cursive script, appearing to read "Regina Blye".

Regina Blye
Executive Director