

**GEORGIA STATE PLAN FOR
INDEPENDENT LIVING
(SPIL)**

**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 as amended August 28, 2009

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PART I: Assurances

State of: Georgia

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 Department of Labor Rehabilitation Services (insert name of DSU). *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 N/A (insert name of separate State agency). 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 the Statewide Independent Living Council of Georgia, Inc. (insert name of 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 **Michael L. Thurmond, Commissioner, Georgia Department of Labor.** (Name, title of DSU director) and **N/A** (Name, title of separate State agency director, if applicable). *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 Georgia is in compliance and will remain in compliance with the aforementioned assurances during FY 2008-2010 (specify the three-year period covered by this SPIL).

The effective date of this amended SPIL is August 28, 2009

SIGNATURE OF SILC CHAIRPERSON DATE

Shelly Simmons
NAME OF SILC CHAIRPERSON

SIGNATURE OF DSU DIRECTOR DATE

Michael L. Thurmond, Commissioner
NAME AND TITLE OF DSU DIRECTOR

Not Applicable
SIGNATURE OF DIRECTOR OF THE SEPARATE DATE
STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

Not Applicable
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) Describe the overall goals and mission of the State's IL programs and services. The SPIL must address the goals and mission of both the SILS and the CIL programs, including those of the State agency for individuals who are blind as they relate to the parts of the SPIL administered by that agency.

Note: In Georgia, the SILS program and the CILs program are not separate programs. The DSU does not have a separate IL program as do some states. All CILs receive both Part C and Part B funding; some CILs have state dollars and some have additional sources of revenue from other public grants or from private sources. The mission and goals of the State IL program are described below.

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

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

The Mission of the State Independent Living (IL) Program is equal participation of people with disabilities within their communities. Therefore, the Statewide Independent Living Council (SILC) will provide leadership and advocacy to obtain results in the following areas:

- **Leadership—more people with disabilities in responsible and responsive leadership roles.**
- **Attitudes—positive public perception of people with disabilities.**
- **The number of people with disabilities who are informed and proactive.**
- **The availability of personal assistance services.**
- **The availability of “visitable” housing.**
- **The availability of funds to retrofit housing to make it accessible.**
- **The income level of Georgians with disabilities.**
- **The availability of accessible public transit.**
- **Equal opportunity to education.**
- **Access to health care & health insurance.**
- **Access to technology.**
- **Access to information, i.e. the availability of alternate formats, Braille materials, interpreters, etc.**

Goal A: Advocate for systemic changes that will benefit people with disabilities in the following areas: (1) home & community-based services, (2) accessible housing, (3) accessible transportation, (4) comprehensive, affordable health care, (5) removing barriers to employment, (6) education, (7) assistive technology and (8) information access.

Objective 1 Advocate for enhanced/expanded home and community-based services.

Methodology: Participate in advocacy coalitions working to expand Home and Community-Based Services, e.g., the Unlock the Waiting List! Campaign. Support CILs in their outreach to people in nursing facilities. Work with Money Follows the Person (CMS grant to Georgia) to increase community – based alternatives to nursing facilities. Provide scholarships to self advocates for training and education.

Desired Outcomes: There will be an increase of at least 360 people served in home and community – based programs by the end of FY 2010.

Objective 2 Promote accessible, affordable housing.

Methodology: Continue participation, support and sponsorship in coalitions such as the EasyLiving Home coalition, Housing Authority task forces, Concrete Change, the Department of Community Affairs Housing programs and other similar coalitions. Provide fiscal agency for individuals and grassroots groups engaged in advocacy for accessible, affordable housing. Continue to advocate for funding to support the CILs in their home modification initiatives.

Desired Outcomes: By the end of FY 2010, there will be at least 2500 EasyLiving Homes certified in Georgia. The CILs will have retrofitted at least 750 homes. At least three (three) local housing authorities will have negotiated Memoranda of Understanding with Centers for Independent Living specifically around nursing facility transition.

Objective 3 Support the efforts of the CILs to increase transportation options in their regions.

Methodology: Report on progress and share successful approaches at each quarterly IL Network meeting. Refer advocates to Disability Law and Policy Center for formal complaints. Search for a community organizer/leader specializing in transportation.

Desired Outcomes: By the end of FY 2010, at least 3 communities will have expanded accessible transportation options.

Objective 4 Promote fundamental health care reform.

Methodology: Participate in state and national health care reform coalitions such as Families USA and Georgians for a Common Sense Health Plan. Educate the IL Network on health care reform initiatives. Locate and support advocates who are interested in health reform initiatives such as the Medicaid Buy In program under TWWIA or universal plans such as SecureCare.

Desired Outcomes: By the end of FY 2008, there will be an operational Medicaid Buy In program.

Objective 5 Promote educational opportunities for students with disabilities.

Methodology: Recruit SILC board member with interest in education issues. Ask CILs & SILC board members to share their successes. Initiate a small scholarship program for students with disabilities.

Desired Outcomes: By the end of FY 2008, there will be an education expert serving on the IL Network.

Objective 6 Remove barriers to employment.

Methodology: Continue sponsorship of the Employment First Georgia project. Pending identification of grass roots leadership, support advocacy efforts for the Medicaid Buy In. Coordinate with the GDOL Vocational Rehabilitation (VR) Program and use fee for service agreements for the CILs to provide IL services to VR clients as part of their individual plans for employment.

Desired Outcomes: By the end of FY 2010, a stand alone Employment Institute (Employment First Georgia) will provide best practices information on customized employment for all stakeholders. At least four CILs will have functioning fee for service agreements with the GDOL VR Program.

Objective 7 Improve access to information.

Methodology: Support advocacy efforts of leaders in the Blind, Deaf and Deaf-Blind community. Continue coordination of efforts with the GDOL Vocational Rehabilitation (VR) Program staff specializing in these services.

Desired Outcomes: Georgia will increase services to Deaf, Blind and Deaf-Blind community.

Goal B: Promote public awareness of the need for expanded services and opportunities for Georgians with significant disabilities.

Objective 1 Update and publish “The Status of Georgians with Disabilities” to include the size of the population by disability type, race, age, gender, income, etc.

Methodology: Contract with consultant to produce policy briefing.

Desired Outcomes: By the end of FY 2008, there will be a comprehensive and reliable data source for individuals and organizations with an interest in disability policy. A “disability primer” for newly elected state officials will be published.

Objective 2. Educate legislators and advocate for the introduction of an Independent Living Act in the Georgia General Assembly in order to (a) create an understanding of services needed by people with significant disabilities, (b) codify the definition of a Center for Independent Living and (c) bring about the recognition of the CIL network as a valuable community asset.

Methodology: Speak with potential sponsors of this legislation. Note that no federal funds will be used for fundraising or lobbying.

Desired Outcomes: By the end of 2010, Georgia will have legislation defining the IL Network and the IL philosophy.

1.2B Describe the steps planned regarding outreach to populations in the State that are unserved or underserved by programs under title VII, including minority groups and urban and rural populations. This section of the SPIL must:

- Identify the populations to be designated for targeted outreach efforts;
- Identify the geographic areas (i.e., communities) in which the targeted populations reside; and
- Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed.

It is safe to say that all of Georgia is underserved when one considers the pool of potential IL consumers. The number of persons with disabilities in Georgia is large and growing, representing about 13% of working-age persons. Total persons with disabilities of all ages (institutionalized and non-institutionalized) is closer to 20% of total population. In 2005, it is estimated that 684,000 of the 5,315,000 working-age individuals in Georgia reported one or more disabilities with the following prevalence rates¹:

**Estimated Prevalence of Disability among
Working-Age People in Georgia
Age 21 - 64**

Disability Group	Percentage	Number	Base Population
One or More Disability	12.9	684,000	5,315,000
Sensory Disability	3.1	164,000	5,315,000
Physical Disability	8.2	434,000	5,315,000
Mental Disability	4.3	229,000	5,315,000
Self-Care Disability	2.4	126,000	5,315,000
Challenges to Go Outside Home	3.4	179,000	5,315,000
Employment Disability	7.5	398,000	5,315,000

According to the Census Bureau, there are 853,595 Georgians with disabilities age 5 and above. In FY 2006, the IL Network provided services to 2,342 people, slightly more than one quarter of 1% (.27%). See Appendix A for Analysis of Underserved Populations. This chart compares the people served in CILs in 2006 with the total population of Georgians with disabilities. There are some conclusions that can be drawn from this data:

- ✓ The CILs serve people in close proportion to gender prevalence in that 60% of those served by CILs were male. In the total population of disabled Georgians, almost 63% are male.
- ✓ The Hispanic/Latino community of people with disabilities is about 3.28% but only 18 people (.77%) of those served by CILs were Hispanic/Latino.
- ✓ The majority of those served by CILs is Black or African American (61.57%) whereas the majority of the total population of people with disabilities is white (63%).

¹ Cornell University (2006). *2005 Disability Status Reports – Georgia*. Rehabilitation Research and Training Center on Disability Demographics and Statistics (StatsRRTC). Accessed via Internet at www.disabilitystatistics.org.

- ✓ **By disability group, people with physical disabilities, vision disabilities multiple disabilities are served by CILs in greater proportion than the disabled population as a whole. For example, almost 47% of the total population has physical disabilities whereas 57.47% of those served by CILs fall into this category. Slightly over 12% of those served by CILs have vision disabilities as compared to 3.85% of the total disabled population. A little over 17% of those served by CILs is categorized as “multiple disability” whereas only 7.52% of the total disabled population has multiple disabilities.**
- ✓ **By disability group, people with cognitive, mental/emotional and hearing disabilities are served by CILs in lesser proportion than the disabled population as a whole. People with cognitive disabilities make up 12.61% of the total disabled population whereas only 5.29% were served by the CILs. People with mental/emotional disabilities make up 19.73% of the total whereas CILs consumers served with this disability was 5.51%. People with hearing disabilities served by CILs comprised 2.31% whereas 9.3% of the disabled population as a whole has hearing disabilities.**

The data bears out what the SILC and CILs have learned from experience: We need to do a better job of reaching out to the Hispanics/Latinos with disabilities as well as to those for whom the service delivery infrastructure is sorely inadequate: People with hearing loss, people who have both vision and hearing loss and people with cognitive disabilities that are not served by the Developmental Disabilities or Mental Health systems, e.g. people with traumatic brain injury.

In terms of geography, the priority region for the next CIL is the Columbus Region. CILs are needed in all areas of the state that are not served. See Appendix B for map of the served/unserved regions.

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

Describe in sections 1.3A and 1.3B, below, the financial plan for the use of Federal and non-Federal funds to meet the SPIL objectives.

1.3A Financial Plan Tables

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	195,225	79,775	233,965	
Chapter 1, Part C			1,833,278	
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			50,000	30,000
Non-Federal Funds				
State Funds	79,775	56,552	113,250	
Other				30,000
Total Funds	275,000	136,327	2, 230,493	60,000

- Other federal funds: \$30,000 federal funds from subaward through State University of New York; \$50,000 requested for CIL operations to come from Social Security Reimbursement program income.
- Other funds: \$30,000 projected program fees from EasyLiving Home GA, EasyLiving Home replication, and Concrete Change.

Year 2 – FY 2009 as Amended August 28, 2009

Sources	Approximate Funding Amounts and Uses			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				
Chapter 1, Part B		508,965	*	
Chapter 1, Part C			1,970,782	
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)	236,250			
Other		72,708		30,000
ARRA Part C			2,683,510	
Non-Federal Funds				
State Funds	20,000	229,577	*	
Other				30,000
Total Funds	256,250	811,250	4,654,292	60,000

- Other federal funds: \$30,000 federal funds from subaward through State University of New York; The FY 2009 update includes an increase from \$50,000 to \$72,708 for additional independent living services to be provided by the CILs from Social Security Reimbursement program income.
- Other funds: \$30,000 projected program fees from EasyLiving Home GA, EasyLiving Home replication, and Concrete Change.

* The 2009 SPIL revisions reflect the DSU contracts with the CILS to provide more Part B and state funds directly to the local CILS to enhance IL services for consumers with significant disabilities.

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	195,225	79,775	233,965	
Chapter 1, Part C			1,833,278	
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			50,000	30,000
Non-Federal Funds				
State Funds	79,775	56,552	133,250	
Other				30,000
Total Funds	275,000	136,327	2,230,493	60,000

- Other federal funds: \$30,000 federal funds from subaward through State University of New York; \$50,000 requested for CIL operations to come from Social Security Reimbursement program income.
- Other funds: \$30,000 projected program fees from EasyLiving Home GA, EasyLiving Home replication, and Concrete Change.

1.3B Financial Plan Narratives

1.3B (1) Specify how the part B, part C and chapter 2 (Older Blind) funds, if applicable, will further the SPIL objectives.

These funds are essential to perform the activities, and provide the services and materials required to achieve the goals and objectives described in Section 1.2.

1.3B (2) Describe efforts to coordinate Federal and State funding for centers and IL services, including the amounts, sources and purposes of the funding to be coordinated.

Please refer to the footnotes in the Financial Tables for this information.

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

Not applicable.

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

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

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

The SPIL clearly focuses on promoting the IL philosophy of equal access, individual and systems advocacy, leadership development and integration/full inclusion of people with disabilities.

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

Several conference calls with the SPIL planning committee included the CILs. The public hearing on the SPIL was held at a statewide training, Best Practices in Independent Living, sponsored by the SILC; CIL staff organized and delivered the training sessions. All CILs participate in quarterly IL Network meetings so the SPIL reflects the CILs priorities and objectives of the developing IL system in Georgia.

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

- Describe the steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC, and centers; the DSU, other State agencies represented on the SILC and other councils that address the needs of specific

disability populations and issues; and other public and private entities determined to be appropriate by the SILC. The description must identify the entities with which the DSU and the SILC will cooperate and coordinate.

The Georgia IL program maximizes cooperation, coordination and working relationships by:

- ✓ **Holding quarterly IL Network meetings that include all CILs;**
- ✓ **Including representatives from the GDOL Rehabilitation Services, the Assistive Technology Program, the Older Blind Program, the program for those with hearing loss, the Client Assistance Program and others in quarterly IL Network Meetings;**
- ✓ **Working in coalitions such as the Unlock the Waiting List! Campaign and Money Follows the Person grant which endeavor to increase community-based alternatives to institutions, the Easy Living Home Coalition which creates basic access in new home construction, Georgians for a Common Sense Health Plan that promotes health care for everyone, etc; and**
- ✓ **Partnering with the Governor’s Council on Developmental Disabilities, the Georgia Advocacy Office, the Department of Community Affairs and others to create new opportunities in housing, employment and other needed support services.**

1.6 Coordination of Services – 34 CFR 364.27

Describe how IL services funded under chapter 1 of title VII of the Act will be coordinated with and complement other services to avoid unnecessary duplication with other Federal, State, and local programs, including the OIB program authorized by chapter 2 of title VII of the Act, that provide IL- or VR-related services.

As previously stated, the Older Blind coordinator attends IL Network meetings as do the Department of Labor, Rehabilitation Services, AT, etc. When a vocational goal is articulated by an IL consumer, the consumer is referred to VR and, when necessary, IL staff assists with IPE development.

All CIL staff is aware of potential programs/resources because they participate in a wide variety of local and statewide coalitions, task forces, work groups, etc. CIL directors are members of the Association of Programs for Rural Independent Living (APRIL), National Council on Independent Living (NCIL), American Association of People with Disabilities (AAPD), etc. so they regularly receive educational emails. Finally, the IL Network meetings always feature resource people from relevant programs such as rental assistance, home ownership, home modification, emergency management, telecommunications programs and so forth. All CILs are well aware of available services and programs.

With over 800,000 Georgians with disabilities, duplication of services is not a problem. We don’t have “cracks in services”, we have canyons, chasms and abysses.

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

Describe how the DSU seeks to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under the Older Individuals who are Blind program and that the DSU determines to be effective.

The DSU administers the Older Blind Grant by contracting with Community Rehabilitation Programs to provide services to people who are older blind throughout the State of Georgia. Centers sometimes house and otherwise work with the Older Blind IL program. While the previous Grant Manager has retired, plans are underway to upgrade the position of the grant manager and recruit and hire at the upgraded Director level position.

The Grant funding continues to increase involvement and provide services to Older Native Americans in Georgia. The Grant intends to provide at least two vision screenings per year for this underserved population. Additional goals of the Chapter 2 Program include:

- 1. Continue efforts to increase the response rate on the program participant survey.**
- 2. Continue training and awareness efforts to facilitate better understanding of services available to blind/low vision services-hard of hearing seniors.**
- 3. Increase involvement with the Regional Library Systems both for advertisement of the Older Blind program and aid with sites for computer training.**
- 4. Continue expansion and collaboration with the Division on Aging and the Coalition of Advocates for Georgia's Elderly.**
- 5. Continue to improve the fiscal management protocol among the Project Director, the older blind contractors and the accounting and budget units within the Georgia Department of Labor.**
- 6. Continue attendance by the Grants Manager at all trainings and meetings of Older Blind Project Directors to obtain input and information for the overall program.**
- 7. Market the computer training programs by all the contractors to the older blind consumers.**
- 8. Continue training and awareness efforts with the program in order to establish better services to the blind/low vision - hard of hearing seniors.**
- 9. Continue to hold the Fall and Spring contractors meeting. In addition to representatives from the National Federation of the Blind of Georgia and the Georgia Council of the Blind, community partners will be invited to participate. Dr. Elton Moore from Mississippi State University Rehabilitation Research and Training Center on Blindness and Low Vision will continue to be Georgia's consultant and program evaluator and participate in the bi-annual contractors' meetings. These meetings will focus on pertinent and timely issues related to Project Independence.**

10. Require (a) the development of a comprehensive independent living service plan, and (b) documentation that validates a visual impairment on all consumers being served.

Section 2: Scope, Extent, and Arrangements of Services

2.1 Scope and Extent – 34 CFR 364.42(b)(2)(3); 34 CFR 364.43(b); 34 CFR 364.59(b)

2.1A Check the appropriate boxes in the SPIL Instrument table indicating the types of IL services to be provided to meet the objectives identified in section 1.2 of this SPIL, and whether the services will be provided by the CILs or by the DSU (directly and/or through contract or grant).

The items below were selected as a result of a conference call with all Georgia CILs. While not each CIL will provide all the selected services, the following services are inclusive of all CILs. For example, one CIL has a rehabilitation teacher for people who are blind while others do not. Two CILs currently house Assistive Technology Resource Centers and four are now developing an AT component.

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			X
- IL skills training			X
- Peer counseling			X
- Individual and systems advocacy			X
Counseling services, including psychological, psychotherapeutic, and related services			
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)			X
Rehabilitation technology			X
Mobility training			X
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services			X
Personal assistance services, including attendant care and the training of personnel providing such services			

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)
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services			X
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			X
Education and training necessary for living in the community and participating in community activities			
Supported living			
Transportation, including referral and assistance for such transportation			X
Physical rehabilitation			X
Therapeutic treatment			
Provision of needed prostheses and other appliances and devices			
Individual and group social and recreational services			X
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			X
Services for children with significant disabilities			X
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			X
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future			X
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities			X
Other necessary services not inconsistent with the Act			X

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

2.1C If the State allows service providers to charge consumers for the cost of services or to consider the ability of individual consumers to pay for the cost of IL services, specify the types of IL services for which costs may be charged and for which a financial need test may be applied, and describe how the State will ensure that:

- Any consideration of financial need is applied uniformly so that all individuals who are eligible for IL services are treated equally; and
- Written policies and consumer documentation required by 34 CFR 364.59(d) will be kept by the service provider.

CILs do not charge consumers for services although people are encouraged to participate to the extent of their ability for some services, including but not limited to, home modifications materials or adaptive equipment.

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

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

The DSU contracts with the SILC to manage Title VII Part B funds and some state IL funds. This contract (1) operates the SILC and (2) provides funding to the CILs for operations or for specific IL services. In addition, Walton Options for Independent Living has a contract with their local Rehabilitation Services agency for IL services. This contract was made possible because local advocates secured a state dollar appropriation specifically for the Augusta Area CIL. The Centers in Macon and Bainbridge accomplished state line item funding as well; the funds for these CILs flow to the DSU to the SILC and then to the Centers.

2.2B If the State contracts with or awards a grant to a center for the general operation of the center, describe how the State will ensure that the determination of an individual's eligibility for services from that center shall be delegated to the center. **Not Applicable**

Section 3: Design for the Statewide Network of Centers

3.1 Existing Network – 34 CFR 364.25

Provide an overview of the existing network of centers, including non-Part C-funded centers that comply with the standards and assurances in section 725 (b) and (c) of the Act, and the geographic areas and populations currently served by the centers.

Georgia has eight Title VII, Part C funded CILs. In addition to the part C funds, the SILC administers state dollars as well as Part B funds.

- 1) Disability Resource Center located in Gainesville serves 13 counties in Northeast Georgia.**
- 2) Bainbridge Advocacy Individual Network located in Bainbridge serves 11 counties in Southwest Georgia.**
- 3) Disability Connections is located in Macon serves 12 counties in middle Georgia.**
- 4) DisAbility LINK is located in Atlanta and serves 12 counties around Metro Atlanta.**
- 5) DisAbility LINK – Northwest is located in Rome and serves 15 counties in northwest Georgia**
- 6) Living Independence for Everyone is located in Savannah and serves 14 counties in southeast Georgia.**
- 7) Multiple Choices is located in Athens serves the 10 counties in mideastern Georgia.**
- 8) Walton Options for Independent Living is located in Augusta and serves 16 counties in east Georgia.**

The map in Appendix B provides a graphic of the current IL Network. In addition, the data in Appendix A show the number, age, gender, ethnicity and disabilities served by CILs in 2006.

3.2 Expansion of Network – 34 CFR 364.25

Describe the design for the further expansion of the network, including identification of the unserved and underserved areas in the State and the order of priority for serving these areas as additional funding becomes available (beyond the required cost-of-living increase).

The map found in Appendix B shows the areas/counties of Georgia with no CIL. It is our intent to develop at least one new CIL by FY 2010 in the most populated region, the Columbus area.

Amendment to Section 3.2 Expansion of Network August 28, 2009

The Georgia Statewide Independent Living Council (SILC) and Designated State Unit (DSU) met in a public hearing on July 30, 2009 in Atlanta and presented information on the proposed distribution of \$66,169 FY 2009 Title VII, Chapter 1, Part C regular funds that are in excess of the cost of living increase and the unexpected allocation of \$2,683,510 in American Recovery and Reinvestment Act (ARRA) funds. The public discussion of the proposals to distribute additional \$66,169 Part C regular funds, use ARRA funds to open a new CIL in Muscogee County and distribute ARRA funds to all CILs to expand and enhance IL service statewide resulted in consensus agreement to this plan:

1. Georgia will distribute the available \$66,169 additional Part C regular funds evenly to the three CILs with the lowest current Part C allocations to enable them to serve more consumers. Georgia chose to distribute these funds to existing CILs rather than establish a new CIL based on the timeframe required to announce and compete for the new CIL and the knowledge that the ARRA funds are available for the new CIL. Without the ARRA funding, the \$66,169 would have been insufficient to establish a new CIL. The updated FY 2009 allocations for the three CILs are as follows:
 - \$22,056 to disABILITY LINK – NW for a total of \$158,194;
 - \$22,056 to Disability Resource Center (formerly Access Hall, Inc.) for a total of \$158,194; and
 - \$22,057 to Multiple Choices for a total of \$159,978.
2. Georgia plans for \$2,000,000 of the Part C ARRA allocation to be distributed to existing CILs as shown in Appendix C. The formula was developed with input from the CILs, SILC, and DSU based on the average number of new consumers served over four fiscal years and the population in the areas served by the CILs. As stated in Section 1.2B of the SPIL: “It is safe to say that all of Georgia is underserved when one considers the pool of potential IL consumers.” Therefore, these ARRA funds will be used by existing CILs to enhance IL services to meet SPIL goals and objectives and to expand services in underserved areas.
3. Georgia will use the remaining \$683,510 of the ARRA allocation to establish a new CIL in the unserved Columbus area. The initial service area will be Muscogee County with the funds spread over the five-year ARRA expenditure period. For the past several years the Georgia SPIL has identified the Columbus unserved area for a new CIL when sufficient funds become available. With the ARRA allocation, Georgia is able to move forward to meet that need. Columbus was identified as the priority area for the next CIL because it is the most populous Georgia city without a CIL. This area is experiencing economic development, and the population is expected to increase. New industries associated with the KIA plant opening in west Georgia in the fall of 2009 and the additions to Fort Benning should bring more potential community support for a new CIL.

3.3 Section 723 States Only – 34 CFR 364.39

3.3A If the State follows an order of priorities for allocating funds among centers within a State that is different from what is outlined in 34 CFR 366.22, describe the alternate order of priority that the DSU director and the SILC chair have agreed upon. Indicate N/A if not applicable.

Not applicable.

3.3B Describe how the State policies, practices and procedures governing the awarding of grants to centers and the oversight of these centers are consistent with 34 CFR 366.37 and 366.38.

Not applicable.

Section 4: Designated State Unit (DSU)

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

4.1A Describe the administrative support services to be provided by the DSU for the SILS (Part B) program and, if the State is a Section 723 State, for the CIL (Part C) program. Refer to the SPIL Instructions for additional information about administrative support services.

The DSU contracts with the SILC to manage Title VII Part B funds and some state IL funds. This contract (1) operates the SILC and (2) provides funding to the CILs for operations or for specific IL services.

Administrative support services are provided primarily to the SILC by the DSU IL liaison and the Georgia Department of Labor (GDOL) budget office and contract services.

The IL liaison creates and renews contracts, processes invoices for payment, reviews and recommends requests for budget revisions and facilitates the approval of such requests by the DSU. Financial and budget services (including technical assistance in budget development) are provided by the GDOL budget office.

The State IL Liaison is responsible for monitoring SILC program and budget activities. To keep abreast of activities, she participates in quarterly SILC meetings, reviews monthly programmatic and expenditure reports, and participates in the quarterly evaluation of SILC/SPIL activities.

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

Section 5: Statewide Independent Living Council (SILC)

5.1 Resource plan – 34 CFR 364.21(i)

5.1A Describe the resource plan prepared by the SILC in conjunction with the DSU for the provision of resources, including staff and personnel, made available under parts B and C of chapter 1 of title VII, section 101(a) (18) of the Act, and from other public and private sources that may be necessary to carry out the functions of the SILC identified in section 705(c). The description must address the three years of this SPIL.

The resource plan for this SPIL builds on previous years in that the SILC receives all Part B funds and some state funds to operate the SILC and to provide funding to the CILs. The staff of the SILC consists of 2.75 positions: A full time executive director, a full time administrative assistant and a business manager at ¾ time. In addition to these funds, the SILC participates in projects with other private and public sources to carry out the objectives of the SPIL. The following are examples of projects and their funding sources:

- ✓ **US Department of Labor’s Office of Disability Employment Policy. This grant funded a joint project with the University of Georgia to develop customized employment services.**
- ✓ **State University of New York funded Concrete Change to promote visitable**

housing design throughout Georgia and the nation.

- ✓ **Georgia Advocacy Office (Georgia's Protection and Advocacy Agency) for outreach to people in nursing facilities.**
- ✓ **Developmental Disabilities Council grant for the Easy Living Home coalition which promotes basic access in newly constructed homes.**
- ✓ **Private funding from foundations, corporations and individuals for special events and to enhance CIL services for home modifications/adaptive equipment or nursing facility transition.**

5.1B Describe how the following SILC resource plan requirements will be addressed:

- The SILC's responsibility for the proper expenditure of funds and use of resources that it receives under the resource plan.

Through its contract with the Georgia DOL, the SILC submits a monthly programmatic report and a monthly expense report to the GDOL Rehabilitation Services IL Liaison, Valencia Wilson Thomas. Ms. Thomas reviews (a) the monthly narrative which reports progress on SPIL goals and (b) the SILC invoice. She then approves the invoice which reimburses SILC for the prior month's expenditures toward contract deliverables. In addition to this monthly review, the SILC conducts an annual audit in accordance with the requirements of Circular A-133. Copies of these audits are provided to the State of Georgia's Office of Audits, the GDOL, the SILC board of directors and upon request, the general public.

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

The GDOL recognizes the SILC as an independent entity in all aspects of interaction.

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

Since Georgia is a fiscally conservative Southern state, the growth of state dollars for IL has been exceedingly slow. The SILC and the DSU recognize the need for additional resources for IL. The DSU is considering whether additional resources could be provided to expand CIL services to the Columbus area.

5.2 Establishment and Placement – 34 CFR 364.21(a)

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies.

The Georgia SILC is a private, non-profit entity that was incorporated in 1995 and is housed in a typical corporate office. DSU employees serving on the SILC are non-voting members.

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

Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b).

SILC of Georgia board members are nominated from a variety of sources; current board members, CIL employees, DSU recommendations, disability specific advocacy groups, visitors to the web site, etc. are all sources for nominations. The SILC board nomination form includes information on SPIL goals, the nominee’s experience/interest in those goals and a job description for SILC board members. The SILC nominating committee reviews applicants and invites them to participate in a board meeting before they commit to service. Finalists are submitted to the GDOL Commissioner for formal appointment.

5.4 Staffing – 34 CFR 364.21(j)

Describe how the following SILC staffing requirements will be met:

As a private non-profit corporation, the governing board hires and supervises the Executive Director (ED) of the SILC. The board has personnel and financial policies that the ED is expected to observe. The ED then hires and supervises other SILC staff.

Section 6: Service Provider Requirements

Describe how the following service provider requirements will be met:

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

Since all Georgia CILs receive Part C funding, they are required to abide by Standards and Assurances for CILs which are monitored by RSA.

6.2 Fiscal Control and Fund Accounting – 34 CFR 364.34

Since all Georgia CILs receive Part C funding, EDGAR standards apply.

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

Since all Georgia CILs receive Part C funding, Standards and Indicators and EDGAR apply.

6.4 Eligibility – 34 CFR 364.40; 34 CFR 364.41

Since all Georgia CILs receive Part C funding, they are required to abide by Standards and Assurances for CILs regarding eligibility.

6.5 Independent Living Plans – 34 CFR 364.43(c)

Since all Georgia CILs receive Part C funding, they are required to abide by Standards and Assurances for CILs. These Standards specify that consumers may develop an IL plan or a waiver.

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

Since all Georgia CILs receive Part C funding, they are required to abide by Standards and Assurances for CILs. Said standards require providing information about the Client Assistance Program.

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

Since all Georgia CILs receive Part C funding, they are required to abide by Standards and Assurances for CILs. Said standards require policies protecting consumer privacy, use and release of information.

Section 7: Evaluation

The SPIL is reviewed quarterly at IL Network meetings and evaluated at least annually as a part of the preparation of the annual 704 report. In addition, CIL annual reports, which include consumer satisfaction information, are reviewed by the SILC.

Section 8: State-Imposed Requirements

Identify any State-imposed requirements contained in the provisions of this SPIL. Indicate N/A if not applicable. 34 CFR 364.20(h)

Not Applicable