**2021-2023 State Plan for Independent Living Comment Report**

Updated: 4/17/20

|  | **Comment** | **Frequency** | **Response** |
| --- | --- | --- | --- |
| 1 | I have found this document to be a tad lengthy and somewhat repetitive, but otherwise good. | 1 | Considered and no changes were made. Length and repetition is required by Federal reporting standards. |
| 2 | In noting language pointing to interagency agreements affecting the SILC, there was no mention of any similar agreement(s) between those agencies and the SILC. This suggests alternatively:   1. The lack of such an agreement(s) with the SILC; and/or 2. The relative importance of only two identified partners in the process (neither of whom is under the control of the SILC);   Uncertain specific methods of identifying past, current, or pending agreements or changes in policy or practices between the 2 de jure (or 3 de facto) signatories related to the SPIL implementation. | 1 | The interagency agreement was used as an example to assure autonomy for the SILC. Public comment resulted in no changes to the draft SPIL. |
| 3 | QUERY: Is there a clear adoption of best practices or description within the SPIL document of how the SPIL has been, or needs to be, more inclusive in its development in several aspects: including varied language (computer programming, so-called plain language, or layout/ braille/Spanish/Russian/ASL or other sign language) or skills access. Was the document subjected to an accessibility scoring tool at any time?  Pursuant to the answer to the above query, it should be considered as to how to measure broad accessibility issues going forward, and set measured goals and benchmarks for testing these measures. | 1 | No clear adoption of best practices within the SPIL document has been made.  The SPIL was reviewed against 508 standards.  The SPIL Committee will take up an activity related to improving accessibility of the SPIL under Objective 1.3B and will develop a plain language summary. |
| 4 | Section 1 - Goals, Objectives and Activities - Page 4 - Goals to be Achieved - Objective 1.1 - Evaluation Measure  Comments/Recommendation:  Objective 1.1 evaluation measure does not specify who, as well as the qualifications required of individuals that will be reviewing the funding formula and methodology.  To promote transparency in state funding allocations, the IDSP recommends the evaluation include consultation with a subject matter expert or experts (SMEs).  SMEs can serve as a valuable resource during an evaluation process by offering discipline or topical expertise that sheds light on the nuances of a complex policy domain. SMEs will promote the overall quality and transparency of an evaluation and reduce the appearance of subjectivity and bias in the overall findings. | 1 | Input received – No change warranted. |
| 5 | Section 1 - Goals, Objectives and Activities - Page 4 - Goals to be Achieved - Objective 2.1 - Consumers will receive IL services to facilitate their independent living goals.  Comments/Recommendation:  The IDSP does not support objective 2.1 in its current form.  Data substantiating the necessity for this objective have not been compiled, reviewed, and analyzed by the SILC SPIL Committee, workgroups, or the SILC Council.  IL services that will be delivered to consumers to facilitate their independent living goals is required by 725 Standards and Assurances as part of CIL compliance. Monitoring the delivery of services is the DSE's role and not that of the SILC.  The IDSP recommends the SILC identify another objective that does not closely correlate with 725 Standard and Assurances. | 1 | Accept comment in part. In that it reflects activities and evaluation activities, we will look at other possible scientific evaluation methods. |
| 6 | Section 1 - Goals, Objectives and Activities - Page 5 - Goals to be Achieved - Objective 2.2 - Consumer access to healthcare is improved.  Comments/Recommendation:  Data collection and analysis of perceived barriers to healthcare by consumers have not been completed by the SILC SPIL Committee, workgroups, or the SILC Council to determine comprehensive action steps to alleviate barriers.  The IDSP recommends the SILC revise objective that calls for data collection and analysis to identify top five systems barriers that prevent consumers access to healthcare. The SILC creating a white sheet for ClLs, and other IL system partners, would create a solid and consistent starting point. | 1 | Input received – No change warranted. |
| 7 | Section 1 - Goals, Objectives and Activities - Page 5 - Goals to be Achieved - Objective 2.3 - The IL system will advocate with transportation coalitions and partnerships to expand transportation options for people with disabilities.  Comments/Recommendation:  The State Plan does not demonstrate that data collection and analysis of consumers perceived transportation barriers have been completed by the SILC SPIL Committee, workgroups, or the SILC Council to determine comprehensive action steps to alleviate barriers.  The IDSP recommends the SILC revise the objective that calls for data collection and analysis to identify top five systems transportation barriers to drive expansion efforts. The SILC producing a white sheet for CILs, and other IL system partners, would create a solid and consistent starting point. | 1 | Input received – No change warranted. |
| 8 | Section 1 - Goals, Objectives and Activities - Page 6 - Goals to be Achieved - Objective 2.3 - The IL system will advocate with housing coalitions and partnerships to expand assess for people with disabilities.  Comments/Recommendation:  The IDSP recommends replacing assess with access.  The IDSP recommends the SILC revise objective to call for data collection and analysis to identify top five systems housing barriers to drive expansion efforts. The SILC producing a white sheet for CILs, and other IL system partners, would create a solid and consistent starting point. | 1 | Typo noted and changed.  Input received – No change warranted. |
| 9 | Section 1 - Goals, Objectives and Activities - Page 6 - Goals to be Achieved - Objective 3.1 - The IL system will educate community partners and funders regarding the value of IL services to consumers.  Comments/Recommendation:  This objective identifies two important demographics to educate. However, it does omit the most important demographic listed in the SILC mission - people in Oregon who experience disabilities. ClLs, and the other IL system partners, serve a small percentage of people in Oregon who experience disabilities and a statewide effort to provide education to this demographic regarding the value of IL services could increase demand and garner support for future investment.  The IDSP recommends the SILC revise the objective to include people in Oregon who experience disabilities.  Furthermore, if "community partners" means local community partners, then the IDSP recommends the addition of statewide community partners and funders. This objective could be further enhanced by referencing 2.3 Coordination - "non-IL" entities listed on page 14 as the list to guide CILs and other IL system partners. | 1 | Will change Objective 3.1 to omit “to consumers.” |
| 10 | Section 1 - Goals, Objectives and Activities - Page 6 - Goals to be Achieved - Objective 3.2 - The IL system will engage in local and statewide systems advocacy to address issues impacting consumer needs.  Comments/Recommendation:  The IDSP recommends the SILC revise objective that calls for data collection and analysis to identify top five systems issues impacting consumer needs. The SILC producing a white sheet for CILs, and other IL system partners, would create a solid and consistent starting point.  Furthermore, the IDSP recommends referencing 2.3 Coordination - "non­ IL" entities listed on page 14 as the list to guide ClLs and other IL system partners. | 1 | Input received – No change warranted. |
| 11 | Section 1 - Goals, Objectives and Activities - Page 7 - Goals to be Achieved - Objective 3.2 - With the support of the IL system, the Oregon SILC will pursue a youth leadership training initiative across the state.  Comments/Recommendation:  The IDSP supports this objective. The IDSP encourages the SILC to specify all phases of the design, implementation, and evaluation should include CILs. CILS have a myriad of expertise in this policy domain, and are essential to ensure statewide success of this objective. Furthermore, some Oregon CILs have developed and piloted youth leadership training projects. | 1 | Supportive – No response needed. |
| 12 | Section 1 - Goals, Objectives and Activities - Pages 3-7 - Goals to be Achieved - 1.3 Objectives  Comments/Recommendation:  The State Plan does not provide financial impact statements for objectives being proposed. Multiple objectives contain evaluation measures specifying 400, 1000, 1900 hours will be spent over the term of the SPIL. These objectives have a financial impact on CILs and other IL system partners.  The IDSP recommends a financial impact statement be comprised for the proposed and future objectives. This will provide transparent information to the board of directors of Clls and their staff, and other IL system partners, so they can make informed decisions when developing their CIL budgets and strategic plans. In addition, producing a financial impact statement appears to be a common practice of ACL. | 1 | Input received – No change warranted. |
| 13 | Section 2.2- Outreach - Pages 12-13 - Underserved  Comments/Recommendation:  The IDSP supports CILs developing their own targeted outreach plans for their underserved populations.  The IDSP recommends the SILC consider adding to their language that Cl Ls are required by compliance indicators to conduct and report activities, using the annual program performance reports, to eligible individuals. These individuals will represent a diversity of significant disabilities and will be members of populations that are unserved or underserved. | 1 | Supportive – No response needed. |
| 14 | Section 2.3- Coordination - Pages 13  Comments/Recommendation:  The IDSP concurs that the regularly scheduled meetings of the IL System partners provide opportunities for communication and coordination of services and activities.  The IDSP recommends this section be enhanced by adding IL System partners will review data, complete analysis and produce white sheets that will increase the effectiveness of statewide systems advocacy, improve the effectiveness of local service, promote inclusion, and minimize the duplication of services. | 1 | Supportive – No response needed. |
| 15 | Section 2.3- Coordination - Pages 14 - Non-IL Entities  Comments/Recommendation:  This list is very comprehensive apart from omitting LGBTQIA+ & Two Spirit agencies/organizations, Latino specific entities, and tribal specific entities. In addition, the United States Homeland Security, United States Citizenship and Immigration Services (USCIS) was removed from the comprehensive list.  Public input and/or focus group feedback from people in eastern Oregon who experience disabilities expressed a need to improve IL services and coordination for people in Oregon who experience disabilities and are members of the LGBTQIA+ & Two Spirit communities.  People in Oregon who experience disabilities that have self-deported or are in the process of deportation, are at extreme risk of institutionalization, hate and bias crimes, not having access to adequate healthcare, medications, and durable medical equipment.  The IDSP concurs with all entities listed and recommends this section be enhanced by adding:  • Basic Rights Oregon and/or other LGBTQIA+ & Two Spirit entities;  • Latino specific entities;  • Tribal specific entities;  • United States Citizenship and Immigration Services (USCIS) | 1 | Will add the suggested entities. |
| 16 | Section 3.1- Network of Centers - Pages 16 – EOCIL.  Comments/Recommendation:  Each listing for CILs contains information regarding counties serviced. EOCIL's The Dalles office indicates Wasco County. EOCIL's The Dalles office serves Hood River, Wasco, and Sherman Counties.  The IDSP recommends the SILC list Hood River, Wasco, and Sherman Counites for this office. | 1 | No change. We want to maintain the concept of unserved areas and priorities for expansion through state or federal funding. |
| 17 | Section 3.1 -Network of Centers - Pages 16.  Comments/Recommendation:  Through an agreement with Aging and People with Disabilities, the network of centers provide limited IL services in all Oregon counties. This ADRC service delivery model list each Oregon county and identifies the CIL responsible for service delivery.  The IDSP recommends the SILC determine if this information should be included in the State Plan. | 1 | No change to existing language, to preserve the importance and meaning of *unserved areas*. |
| 18 | Section 3.2 -Expansion and Adjustment of Network - Pages 19.  Comments/Recommendation:  Prior SPILs listed the priorities as:   1. Eastern Oregon Region (Baker, Gilliam, Grant, Harney, Malheur, Morrow, Umatilla, Union, Wallowa and Wheeler Counties - currently served by a non-Part C-funded CIL.) May receive funds of any amount not exceeding its Target Base Funding Level. 2. Lane County Region (Lane County - currently served by a non-Part C­ funded CIL.) May receive funds of any amount not exceeding its Target Base Funding Level. 3. Salem Region (Marion Polk and Yamhill Counties) 4. South Coast Region (Coos and Curry Counties) 5. Central Willamette Valley/Coast Region (Linn, Benton, and Lincoln Counties) 6. North Coast Region (Clatsop, Columbia and Tillamook) 7. Columbia Gorge Region (Hood River, Sherman and Wasco)   The IL network was informed the Eastern Oregon Region and Lane County Region had to be listed in order to be considered for any new Part C funding. SILC staff were asked to verify if this was in fact necessary before removing these two previous priorities. Information had not been provided at the time of this State Plan Input.  The IDSP recommends the SILC obtain written clarification from ACL if the Eastern Oregon Region and Lane County Region need to be listed to be considered for new Part C funding and provide this interpretation to CILs and other IL partners. | 1 | Need to get more clarification before making a decision. |
| 19 | Section 4 - Designated State Entity - Pages 20  Comments/Recommendation:  Vocational Rehabilitation was selected to serve as the designated state entity; however, the State Plan does not provide any information on what research and analysis informed this decision. The IDSP is unable to determine if the SILC's decision was based on a comprehensive analysis and if Vocational Rehabilitation offers a higher-level of advocacy (e.g. legislative advocacy, executive branch advocacy, and advocacy within Vocational Rehabilitation's current service delivery model) than other agencies like Aging and People with Disabilities.  The IDSP recommends the SILC add an objective, or other language, indicating the SILC will engage in exploration activities to identify a designated state entity that will advance Oregon's IL system, at least once in a SPIL period. Furthermore, if not already a SILC practice, the IDSP recommends the full SILC body review the intergovernmental agreement at least once in a SPIL period. | 1 | Did not add language in the SPIL concerning the DSE relationship. |
| 20 | Section 5.3- Maintenance of SILC- Pages 26 Comments/Recommendation:  The current SILC Council, SILC Executive Committee, SILC staff, SILC Council leadership positions, and possibly Cl Ls, appear to significantly lack adequate representation from:  • People in Oregon who experience disabilities and are members of the LGBTQIA+ & Two Spirit community;  • People in Oregon who experience disabilities and are members of the Latino community;  • People in Oregon who experience disabilities and are members of Tribal communities;  • People in Oregon who experience disabilities and are members of other ethnic and racial communities;  • People in Oregon who experience disabilities and are women in SILC leadership positions.  The IDSP recommends the SILC Council obtain SME assistance and evaluate its composition, and the IL system as a whole, to limit institutional bias and ensure the cultural, ethnic, and racial diversity of the State of Oregon. | 1 | This is a SILC issue. No comment needed in the SPIL. |
| 21 | Comments/Recommendation:  The draft State Plan does not appear to have been juxtaposed with recent passed legislation (e.g. House Concurrent Resolution 33) executive orders, or other state plans/initiatives (e.g. OHA - Oregon State Health Improvement Plan).  The IDSP recommends the draft State Plan be juxtaposed with recent passed legislation, executive orders, and state plans/initiatives.  At a minimum, the SILC should consider revising the draft State Plan to include the following aspects of House Concurrent Resolution 33:  • Culturally responsive, linguistically appropriate, gender relevant and informed by voices of those with lived experiences;  • Become informed regarding well-documented short-term, long-term and generational impacts of adverse childhood experiences; toxic stress and structural violence on children, adults and communities and to become aware of evidence-based and evidence-informed trauma-informed care practices; tools and interventions that promote healing and resiliency in children, adults and communities so that people, systems and communities can function at their full capacity and potential in school, in the workplace and in community, family and interpersonal relationships;  • Apply a trauma-informed care approach to services. | 1 | Accept as input and commit to considering this in the future. |
| 22 | I have reviewed the draft State Plan and input provided by EOCIL’s Institute for Disability Studies and Policy. I concur with EOCIL’s IDSP input. | 33 | Input received – no change warranted. (See responses to comments 4-21) |
| 23 | Section 2.3 Coordination: Equal Assistance to immigrants and also immigrants with a disability without having a penalty because of the executive order as the public charge. | 3 | Input received – addressed in other responses. |
| 24 | Please include more assistance for immigrants who are in the United States. Please provide help to those with a disability without using the assistance against them at a later time due to their immigration status. All individuals should be granted the same assistance without any fear of it later affecting their immigration process. | 3 | Input received, but no action needed in the SPIL. |
| 25 | We appreciate the work of the State Independent Living Council and Oregon’s Centers for Independent Living in drafting this plan to empower people in Oregon who experience disabilities to direct their lives, access their communities and fulfill their responsibility at their desired level of  independence. Generally, [commenter] would note that a few of the evaluation measures listed in pp4-7 (particularly with regard to “Access to Transportation” and “Access to Housing”) seem too broad compared to other evaluation measures:  On page 4, under “Objective 1.2”, the evaluation measure for advocating  for IL program funding states, “Completed advocacy activities and any outcomes have been identified.” [Commenter] recommends that the SPIL specify some of the specific “advocacy activities” that will be  undertaken to secure program funds. We do not have specific wording to suggest. *[see also related comments 27-29]* | 1 | Input received – No change warranted. |
| 26 | On page 5, under “Objective 2.3,” the evaluation measure for “Access to  Transportation” states, “PPR data will show at least 400 hours spent over the term of the SPIL period on community activities, to address Access to Transportation.” Hours spent does not necessarily reflect outcomes achieved. [Commenter] recommends that the SPIL evaluation measure state, “PPR data will show at least 400 hours spent over the term of the SPIL period on community activities, to address Access to Transportation**, and positive outcomes that have expanded transportation options for people with disabilities will be identified**.” (Added language in **bold**.) | 1 | Input received – No change warranted. |
| 27 | On page 6, under “Objective 2.4,” the evaluation measure for “Access to Housing” states, “PPR data will show at least 400 hours spent over the term of the SPIL period on community activities, to address Access to Housing.” As noted above, hours spent does not necessarily reflect outcomes achieved. [Commenter] recommends that the SPIL evaluation measure state, “PPR data will show at least 400 hours spent over the term of the SPIL period on community activities, to address Access to Housing**, and positive outcomes that have expanded access for people with disabilities will be identified**.” (Added language in **bold**.) | 1 | Input received – No change warranted. |
| 28 | On page 7, under Objective 3.4, the evaluation measure for “the youth leadership training initiative” states, “By the end of the SPIL period, the SILC will have conducted research and developed a concept for a youth leadership training initiative, including how it could be funded.” The development of a concept may be too modest a measure of progress on pursuing a youth leadership training initiative across the state for the three-year period. [Commenter] recommends that, in addition to developing a concept and identifying how it could possibly be funded, that the SPIL state that the SILC will have taken significant steps toward actually securing that funding. We propose the following revised  language: “By the end of the SPIL period, the SILC will have conducted research and developed a concept for a youth leadership training initiative, including how it could be funded, **and will have taken significant steps toward securing that funding**.” (Added language in **bold**). | 1 | Input received – No change warranted. |
| 29 | We have a number of comments related to the table of “Independent living  services,” (Table 2.1A):  On page 9, under Table 2.1A “Independent living services,” the entities identified providing services include “CIL” or “CIL – OCB.” The previous SPIL (2017-2019) arranged this information differently and included the Designated State Unit (DSU) as a provider, and whether it would be provided “directly,” “through contract and/or grant,” or “not through DSU  contracts/grants.” [Commenter] is curious to know the reason for and significance of this rearrangement of the information. We do not necessarily have a specific recommendation to make, without more information. *[see also related comments 31 & 32 below]* | 1 | Requires template change – no change to this section. |
| 30 | On page 9, under Table 2.1A “Independent living services,” under the first row about “Core Independent Living Services,” the table could probably be clearer. It is unclear how the information about “Subchapter B” funds, “other funds,” and who the service is “provided by” in the columns on the right correspond to the bulleted list in the first column on the left. For example, there are five bullets (and three sub-bullets) on the first column on the left; however, there are only four (not five) rows filled in under the columns on the right. [Commenter] would recommend that the table row concerning “Core Independent Living Services” be edited to make it a little clearer. The previous SPIL (2017-2019) organized each of the bullets in the left-most column as its own distinct row of information. We recommend using a similar format. | 1 | Requires template change – no change to this section. |
| 31 | On page 11, under Table 2.1A “Independent living services,” under “Therapeutic treatment,” the current SPIL (2021-2023) states that no “therapeutic treatment” will be provided using “Subchapter B” or “other funds,” yet the previous SPIL (2017-2019) indicated that there would be “therapeutic treatment” provided by both the Designated State Unit (DSU) and the Centers for Independent Living (CILs). [Commenter] is concerned about the lack of “therapeutic treatment” planned for in the current SPIL. We recommend including “therapeutic treatment,” to the extent feasible, in the current SPIL (2021-2023). | 1 | Requires template change – no change to this section. |
| 32 | [Commenter] would also like to share the following comments concerning subsection 2.2 “Outreach”:  On page 12, under subsection 2.2 “Outreach,” under “Unserved”, the draft states, “In unserved populations, outreach by the SILC will consist of conducting assessments to support the identification of needs for IL services in these areas, to identify statewide advocacy issues for guiding SPIL activities and to recruit SILC members.” The previous SPIL (2017-2019) described that “The network of CILs will continue to engage in outreach to provide specific services in un-served areas, through  contracts/fee-for-service agreements as they are developed.” [Commenter] would recommend that outreach to provide specific services to unserved areas through contracts/fee-for-service agreements, to the extent feasible, should continue and be included in the SPIL (2021-2023). We propose the following revised language: “In unserved populations, outreach by the SILC will consist of conducting assessments to support the identification of needs for IL services in these areas, to identify statewide advocacy issues for guiding SPIL activities and to recruit SILC members. **The network of CILs will continue to engage in outreach to provide specific services in un-served areas, through contracts/fee-for-service agreements as they are developed**.” (Added language in **bold**). *[see also related comment 34 below]* | 1 | Input received – the following change incorporated.  **The network of CILs will continue to engage in outreach to provide specific services in un-served areas, through contracts/fee-for-service agreements as they are developed.** |
| 33 | On page 13, under “Underserved,” the draft states, “Through the SPIL, outreach to underserved populations will be performed through collaboration of the SILC and CILs conducting needs assessments. In addition, CILs will develop their own targeted outreach plans to their underserved populations.” This section is vague and probably provides too much discretion in terms of what the outreach plan will be based upon. A comparable section in the previous SPIL (2017-2019) described  those efforts with greater specificity and guided CILs toward specific sources of information. The previous SPIL (2017-2019) stated, “Each CIL will develop outreach plans based on SPIL needs assessment, 704 statistical information, and Oregon’s information in Cornell University’s  Disability Status Report to address various target populations within their service areas, and will include all populations included in this section of the SPIL.” Assuming the aforementioned sources of information are still available, we propose the following revised language in the SPIL (2021-2023): “Through the SPIL, outreach to underserved populations will be performed through collaboration of the SILC and CILs conducting needs assessments. In addition, CILs will develop their own targeted outreach plans to their underserved populations. **Those targeted outreach plans will be based on SPIL needs assessment, 704 statistical information, Oregon’s information in Cornell University’s Disability Status Report, and other relevant sources, to address various target populations within their services areas, and will include all populations included in this section of the SPIL**.” (Added language in  **bold**). The SPIL (2021-2023) may need to specify all populations that should be considered in creating the targeted outreach plan. While a targeted outreach plan may focus on one population more than another, the plan can still address all populations—such as why other subpopulations were not targeted. | 1 | Input received – No change warranted. |
| 34 | Finally, we also identified a one minor typographical error that we wanted to note,  so that it can be corrected in the final draft:  On page 6, under Objective 2.4, the draft states, “The IL system will advocate with housing coalitions and partnerships to expand **assess** for people with disabilities.” [Commenter] recommends that the typo be corrected by replacing the use of the word “**assess**,” with the word “**access**.” | 1 | Typo noted and changed. |