



FREQUENTLY ASKED QUESTIONS

Understanding the Role of the Independent Living (IL) Network Before, During and After a Disaster¹

Experiencing the short- and long-term impact of a disaster can be devastating for anyone. We know this is especially true for people with disabilities, older adults, and their families. For decades, Centers for Independent Living (CILs) and State Independent Living Councils (SILCs) have made significant contributions in assisting these individuals prepare for and navigate the upheavals and threats to their health, independence, and community living that occur before, during, and following such events.

The Administration on Disabilities (AoD), part of the Administration for Community Living (ACL), recognizes the leadership role that the IL Network plays in developing, improving, and expanding inclusive emergency preparedness and disaster response and recovery strategies. We are committed to collaborating with you to make these efforts impactful.

The following frequently asked questions (FAQs) are intended to help ACL grantees better prepare for and respond during disasters. It is not, however, a comprehensive guide to emergency response, and AoD grantees are strongly encouraged to reach out to AoD Program Officers with any questions about the appropriate use of federal funds.

Q1: What types of services are CILs allowed to provide to individuals with significant disabilities with federal Part C funds during a federally declared disaster?

A1: CILs can provide IL services to individuals with significant disabilities living inside their service area, as defined in the State Plan for Independent Living (SPIL), at any time, including before, during and after a federally declared disaster. CILs provide both core services as well as additional independent living services that can be critical in assisting individuals with disabilities to maintain their health, independence, and well-being before, during, and after disasters. Core services that can assist in a disaster can include information and referral; independent living (IL)

¹ Disasters are divided into 2 basic groups: natural and man-made. Among the natural disasters are earthquakes, volcanoes, hurricanes, floods, and fires. Among the man-made disasters are war, pollution, nuclear explosions, fires, hazardous materials exposures, explosions, and transportation accidents. These includes public health emergencies as well.

skills training; peer counseling; individual and systems advocacy; and services that facilitate transition from nursing homes and other institutions (including temporary shelters) to the community, provide assistance to those at risk of entering institutions, and facilitate transition of youth to postsecondary life.

CILs may also provide additional services that can assist in a disaster, including psychological counseling, assistance in securing housing or shelter, personal assistance services, transportation referral and assistance, physical therapy, mobility training, rehabilitation technology, recreation, and other services necessary to improve the ability of individuals with significant disabilities to function independently in the family or community and/or to continue employment.

CILs and SILCs must ensure that federal independent living grants funds are only used for permissible expenses. For services, supplies and resources for which federal independent living grant funds cannot be used – such as home repair and disaster clean up – CILs can partner with local governments and other non-profit organizations that are active in disaster response and recovery. The IL Network is encouraged to work with partners in their state or territory that may have funds available, and/or to apply for other grants, that can pay for additional services and supports to meet the needs of individuals with disabilities, including during a disaster.

If grant money is spent improperly, even during a disaster, a CIL or SILC will be considered out of compliance and will need to rectify the situation in coordination with their AoD Program Officer.

Q2: What role does the SPIL and SILCs/CILs play in emergency preparedness and disaster response?

A2: SILCs should facilitate discussion of emergency management issues and identify the unique issues for people with disabilities during and after disaster, and opportunities for planning before. This is best done during moments of ‘steady state’ or ‘blue skies’ operations when there is no emergency. Through the development of the SPIL, the SILC and the CILs are strongly encouraged to develop emergency management goals specifically as they relate to federally declared disaster activities and clarify the roles the CILs and SILC will play during that time. If the SPIL includes emergency preparedness, IL funds can be used to connect CILs to emergency preparedness agencies throughout a state.

ACL encourages SILCs and CILs to establish on-going relationships with state or local government emergency management entities and other community partners before a disaster is declared by the federal government. ACL encourages the IL Network to be active by participating on disaster committees, assisting with developing resource opportunities, and applying for grants that can increase the capacity and resources of IL organizations to address the needs of people with disabilities before, during or after a disaster.

ACL encourages the IL Network to take the following steps to address emergency preparedness in Sections 1 and 2 of the SPIL:

- Describe what SILC and CILs efforts will be before, during and after a federally declared disaster.
- Describe how CILs will provide services during and after a federally declared disaster, including how CIL service areas may be temporarily modified and the rationale for any changes.
- Describe the SILC's role in convening stakeholders to improve services for individuals with significant disabilities before, during and after a federally declared disaster.
- Identify how the SPIL's plan for a federally declared disaster relates to their state or territory emergency operation plan.
- Describe the process for all CILs to develop an emergency management plan.

ACL strongly recommends that CILs develop a working relationship with their SILC and one another, as well as with key stakeholders, including other aging and disability grantees funded by ACL, in advance of a federally declared disaster. These partnerships before disaster can enable the Network to better meet the needs of people with disabilities during disaster.

We also urge CILs to strongly consider developing Memorandums of Agreement (MOA) to outline steps CILs can take to assist people with disabilities in affected disaster areas, including service areas that a CIL is not assigned to serve. Collaboration and cooperation before a disaster allows the development of these MOAs and similar agreements and will help clarify roles and responsibilities before a disaster. As a statewide organization, SILCs can take the lead in creating MOAs or other formalized relationships between the Network of CILs and state or local regional emergency management entities to assist with meeting the needs of people with disabilities before, during or after a federally declared disaster.

Q3: Can a CIL serve individuals with disabilities in another CILs service area or in areas not covered by a CIL during a declared federal disaster?

A3: Yes, a CIL can serve individuals with disabilities in another CIL service area with IL funds, if it is included in the SPIL. CILs must coordinate through the SILC to ensure no duplication of service. In addition, CILs may provide IL services to survivors with disabilities who were temporally relocated to their service area in the immediate aftermath of the federally declared disaster for as long as they are in the area. Once an individual with disabilities has returned to their home area, the individual should be transferred to the CIL that serves that area for ongoing needs and services, unless the individual does not want to be served by that CIL.

Q4: Will ACL provide additional funding to support emergency preparedness and federally declared disaster response services?

A4: In general, ACL does not have additional funding outside annual appropriations specifically to help the IL Network prepare for or recover from a disaster. However, on occasion, Congress does appropriate standalone funding in the aftermath of some disasters, which ACL then makes available to grantees. In these situations, ACL publicly announces the funding and also makes targeted outreach to eligible grantee organizations for details about how to apply.

Q5: Can Title VII Part C funding be used for staff over-time pay or consultants during an emergency or declared federal disaster?

A5: All expenses that are allowable before a federally declared disaster are allowable during and after. ACL strongly encourages CILs to have established policies and procedures that address staff time and the use of consultants for addressing an emergency ahead of time. Any consistent policy changes applied across CILs during an emergency should be noted in the SPIL.

Q6: What are the CIL and SILC reporting requirements to ACL following a federally declared disaster?

A6: CILs and SILCs must follow all current reporting requirements. If there is some reason why a CIL or SILC is unable to complete a report due to impact of a disaster, please reach out to your AoD Program Officer to discuss.

Q7: Our SILC or CIL has identified a need to implement emergency preparedness and/or federally declared disaster response training for our staff and consumers in response to a recent disaster. Are training expenses allowable?

A7: Reasonable training expenses are allowable. Grantees are encouraged to review the Uniform Guidance sections on cost allowability and cost reasonableness (45 CFR § 75.403 and 404) to ensure proper use. Grantees may also seek additional funding, identifying alternative training sources, or partner with other ACL grantees for training purposes. For example, grantees should connect with local emergency managers and other community organizations to collaborate around training and confirm if training is already available for IL Network staff. The IL Network may also consider providing disability awareness training for emergency management staff and other community organizations, whether as part of an existing training opportunity or separately.

Q8: Can ACL recommend best practices for the frequency of emergency drills with staff and/or board members?

A8: It is reasonable that staff and board members be made aware of the current policies and procedures for the organization. It is a recommended best practice for emergency drills to be held annually or in accordance with established organizational emergency policies and procedures. CILs should develop a detailed emergency plan that outlines how they will work before, during or after disasters. This is often called a continuity of operations plan (COOP). These plans may look very different from CIL to CIL. (More information is located in Additional Resources section.)

Q9: Due to an emergency, our CIL has identified needs that apply to its infrastructure. Can we pay for building repairs or purchase a security system, or an emergency alert system?

A9: There are no changes or expansions to the allowable expenses outlined in (45 CFR § 75) or the Rehabilitation Act, as amended (Rehab Act), in the case of an emergency or disaster. CILs are encouraged to review the sections on cost allowability and cost reasonableness (45 CFR § 75.403 and 404) for familiarity. CILs should also review the section on insurance and indemnification, specifically 45 CFR § 75.447(c), to ensure that the CIL utilizes insurance coverage to address damages or conduct repairs before expending federal funds. Grantees are expected to make prudent, reasonable decisions regarding the allowability of costs. Contact your AoD Program Officer if additional guidance is needed. Prior approval from your AoD Program Officer is required for any equipment purchases with a per unit cost of \$5,000 or more (45 CFR § 75.439).

Q10: What types of federally declared disasters or emergencies should CILs/SILCs consider when developing emergency operations plan or goals within the SPIL?

A10: Each CIL's emergency operations plan (sometimes called an EOP) should include all disaster scenarios based on your service area. As organizations serving within your communities, you will have the best understanding of the types of disasters your area may face and their potential impact on people with disabilities. Contact your local emergency management entity for more information or to get involved.

Here are some questions to consider when developing an EOP or COOPⁱ at the SILC or CIL level:

- ✓ Are there office procedures in place for a range of emergency activity (such as inclement weather, domestic disturbance, or active shooter scenario)?

- ✓ Are staff, board members, consumers aware of and familiar with these procedures? Has training been developed/provided?
- ✓ How will you communicate with staff during an emergency when power may be limited?
- ✓ Are these procedures reviewed and communicated to staff and others as applicable on a regular basis?
- ✓ Do you have a plan to exercise your EOP and/or COOP² (drills, tabletop exercises, etc.)? Are you engaged with local emergency planners and exercise coordinators? Are you connected with FEMA Regional Disability Integration Specialists?
- ✓ Do staff and board members know where to get the latest information related to weather/disaster activities/evacuation?
- ✓ Do staff know how to access the employee assistance program or other counseling resources should an emergency occur?
- ✓ Have you engaged with your community partners for trainings or feedback on your emergency plan?
- ✓ Do you have operating procedures in place post disaster?
- ✓ In the event of office closures, are there teleworking policies and procedures in place? For example, do staff have the appropriate equipment to work from home? In the case of CILs, are there policies to allow CIL consumers to approve an Independent Living Plan (ILP) remotely?
- ✓ Has the SILC developed a relationship with the State Emergency Operations leadership?

Q11: Our CIL is new to engaging in disaster preparedness, response and recovery. Where do we start? What are some of the areas where CILs can be involved? What steps can I take to learn more?

A11: All disasters are local and vary by region, and this is where the conversation should begin. If you don't know your county emergency manager, this is a good place to start. An introductory meeting can provide an opportunity to introduce your CIL, the services you provide and to jointly educate one another about your capacity and the needs of individuals with disabilities in the area.

Other ideas include:

- Review the current SPIL for emergency management related goals.
- Talk to other CILs in the state to hear about any experiences or best practices in collaborating around emergency management issues.
- Review technical assistance.
- Collaborate with and learn from other disability organizations such as University Centers for Excellence in Developmental Disabilities Education, Research, and Service (UCEDD),

² An Emergency Operations Plan (EOP) outlines how an organization will function during the various phases of an emergency. A Continuity of Operations Plan (COOP) outlines how an organization will continue to provide essential services during an emergency. We may want to look at a definition page in the next version of this.

Protection and Advocacy Systems (P&As), and Developmental Disabilities Councils (DD Council), aging agencies (Area Agencies on Aging (AAA) and the State Units on Aging (SUA)), and human services and public health organizations in your area to learn more about the needs of the populations you serve and develop synergies to meet those needs.

Q12: Can SILCs or CILs assist another state's or territory's IL organizations?

A12: SILCs and CILs are not able to directly fund activities in another state or territory, even in response to a disaster. However, the IL Network is encouraged to support states or territories in need of assistance through mentoring, technical assistance, and connection to external resources and funding opportunities.

Additional Resources:

American Red Cross: <https://www.redcross.org/>

Federal Emergency Management Association (FEMA), Continuity of Operations Planning (COOP): https://www.fema.gov/pdf/about/org/ncp/coop_brochure.pdf

FEMA: Office of Disability Integration and Coordination:
<https://www.fema.gov/about/offices/disability>

ILRU: Resources on Emergency Preparedness & Recovery:
<https://www.ilru.org/projects/disability911/resources-emergency-preparedness-recovery>

Partnership for Inclusive Disaster Strategies: <https://disasterstrategies.org/>

Ready.gov: People with Disabilities: <https://www.ready.gov/disability>

Voluntary Organizations Active in Disasters (VOAD): <https://www.nvoad.org/>
