



♥ Ensuring a Place at the Table for Every Family

**Comments of the  
National Center for Parent Leadership, Advocacy, & Community Empowerment on  
*Partnerships for Innovation, Inclusion & Independence***

Submitted via email to [P3I-comments@acl.hhs.gov](mailto:P3I-comments@acl.hhs.gov)

The National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE) is a national non-profit composed of over 40 local, state, and national family-led organizations around the country. Our vision is that all families will be effective partners in improving services to and outcomes for our nation's children, especially those who face the greatest challenges. Our mission is to empower families and family-led organizations to advocate for enhanced, meaningful parent involvement and leadership in all policy decision-making that impacts services for children and families across education, health, and other systems. While we are primarily focused on ensuring that the voices of parents and parent organizations help to shape policies, practices, and services, we also strongly support ensuring that constituents across systems – including adults with disabilities – have a meaningful place at decision-making tables that impact their lives.

For these reasons, National PLACE strongly opposes the President's Fiscal Year 2018 proposal to consolidate and significantly reduce funding for three critical programs in the U.S. states and territories. This proposal includes a \$57 million reduction in funds for persons with disabilities by creating a new program called *Partnerships for Innovation, Inclusion, and Independence* within the Administration for Community Living in the U.S. Department of Health and Human Services. Proposed funding for this new program is \$45 million, which is a 57% reduction in funds currently appropriated for three separate existing programs: The Councils on Developmental Disabilities, the Centers for Independent Living, and the State Grant Program for Traumatic Brain Injury, each of which has its own mission and targeted population. It is challenging enough for each of these programs to achieve its mission with current funding; it will be impossible to achieve innovation, inclusion and independence with such a significant cut and an attempt to consolidate these very different programs.

We also note that this change is being proposed without any attempts to consult with the parents of and people with disabilities who will be the most negatively impacted by it. These programs cannot and should not be changed by presidential fiat. Congressional authority is required to change any of these programs, each of which is connected to federal disability laws, and such

Congressional action should not take place without deep and meaningful engagement of the families of and people with disabilities for whom these programs are intended.

It is particularly concerning to National PLACE that this proposal could be the death knell for Statewide Independent Living Councils (SILCs). The Independent Living State Grants (Part B) are the primary source of many SILCs, which will cease to exist if this plan moves forward. SILCs are constituent-controlled councils with the responsibility to develop, monitor, and evaluate the 3-year federal Statewide Plans for Independent Living, which outline goals and objectives to improve the independence of people with disabilities. The Statewide Independent Living Councils (SILCs) provide a critical opportunity for the voices of people with a range of disabilities to influence policies impacting disability. Eliminating these funds will halt an intentionally-designed, constituent-controlled process that provides people with disabilities and their families have direct input into both the state plan and the direction of independent living, and have a negative impact on people with disabilities, their families, communities, and states.

The Councils on Developmental Disabilities also serve as a place where the voices of families of and people with developmental disabilities can be strengthened and heard, and thus National PLACE strongly supports their continued independent, funded existence.

People with all types of disabilities deserve the best we can offer in order to help them live the best life possible – with independence, inclusion, control over their own lives, and dignity. They and their families must have a meaningful role in making decisions about how federal, state and local governments provide services to and support them and their families. While National PLACE strongly supports “innovation, inclusion, and independence,” we strongly urge you to continue to fund these three separate programs and not support the creation of the inappropriately-named *Partnerships for Innovation, Inclusion and Independence* as proposed in the President’s FY ’18 budget.

Thank you for your anticipated thoughtful consideration of our comments.

Very truly yours,

A handwritten signature in black ink that reads "Diana MTK Autin". The signature is written in a cursive, flowing style.

Diana Autin  
Executive Director  
The National Center for Parent Leadership, Advocacy & Community Empowerment

### ***National PLACE Members***

AFCAMP (Hartford, CT)  
Arkansas Waiver Association  
ASK Resource Center (Iowa)  
Association for Special Children and Families (NW New Jersey)  
Connecticut Parent Advocacy Center (Connecticut)  
Exceptional Children's Assistance Center (North Carolina)  
FACT Oregon (Oregon)  
Family Connection of South Carolina  
Family Matters PTI (Illinois)  
Family Network on Disabilities (Florida)  
Family Resource Center on Disabilities (Chicago Metro Area, Illinois)  
Family Soup (California)  
Family Voices of California  
Family Voices of New Jersey  
Family Voices of Wisconsin  
Federation for Children with Special Needs (Massachusetts)  
FIRST Parent Center (North Carolina)  
Formed Families Forward (Virginia)  
INCLUDEnyc (New York City)  
Long Island Advocacy Center (Long Island, New York)  
Louisiana PTI  
Matrix Parents (California)  
National Federation of Families for Children's Mental Health (National)  
Open Doors for Multicultural Families (Washington)  
Parent Educational Advocacy Training Center (Virginia)  
Parents Helping Parents (San Jose, California)  
Parent Network of Western NY (Buffalo)  
Parents Place of Maryland  
Parents Reaching Out (New Mexico)  
Parent to Parent of Georgia (Georgia)  
Parent to Parent USA (National)  
PEAK Parent Center (Colorado)  
PEAL Parent Center (Pennsylvania)  
PEATC (Virginia)  
Rhode Island Parent Information Network  
Rowell Family Empowerment (California)  
SPAN (New Jersey)  
Starbridge (New York State)  
Support for Families (San Francisco, California)  
Washington PAVE  
West Virginia Parent Training & Information  
Wisconsin FACETS