

# **State Plan for Independent Living (SPIL) for Montana for 2014-2016**

## **General Information**

Designated Agency Identification

State: Montana

Agency: Montana Department of Public Health + Human Services - Disability Employment and Transitions Division

Plan for: 2014-2016

Submitted in fiscal year: 2013

View grant [H169A130039](#) in the Grant Award screen.

# **Part I: Assurances**

## 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.

Montana Department of Public Health and Human Services- Disability Employment Transitions Division

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.

Montana Department of Public Health and Human Services- Disability Employment Transitions Division

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.

Montana Statewide Independent Living Council

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. Yes

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. Yes

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. Yes

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 James Marks, Administrator, Disability Employment and Transitions Division, DPHHS.

## 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;
- 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.

Yes

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. Yes

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;
- 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.

Yes

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. Yes

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. No

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. Yes

### 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. Yes

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. Yes

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.

Yes

3.4 Participating service providers meet all applicable State licensure or certification requirements. Yes

#### 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. Yes

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. Yes

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. Yes

#### 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. Yes

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, 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.

Yes

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. Yes

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. Yes

#### 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. Yes

#### 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.

Yes

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. Yes

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. Yes

## 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). Yes

## Section 9: Signatures

As the authorized signatories, we will sign, date and retain in the files of the state agency(ies) and the Statewide Independent Living Council the Part I: Assurances, 1-8, and the separate Certification of Lobbying forms ED-80-0013 (available in [MS Word](#) and [PDF](#) formats) for the state independent living program (Part B) and the centers for independent living program (Part C).

The effective date of this SPIL is October 1, 2013.

### Section 9: Signature for SILC Chairperson

Name June Hermanson

Title Chairperson of Montana Statewide Independent Living Council

Signed? Yes

Date signed 06/28/2013

### Section 9: Signature for DSU Director

Name James Marks

Title Administrator, Disability Employment and Transitions Division, DPHHS

Signed? Yes

Date signed 06/28/2013

### Section 9: Signature for Separate State Agency for Individuals Who Are Blind

Is there a Separate State Agency for Individuals Who Are Blind? No

Name James Marks

Title Administrator, Disability Employment and Transitions Division, DPHHS

Signed? Yes

Date signed 06/28/2013

## **Part II: Narrative: Section 1 - Goals, Objectives and Activities**

### Section 1: Goals, Objectives and Activities 1.1 Goals and Mission

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.

Goal Name: Mission Statement

Goal Description:

It is the intent of the Montana Statewide Independent Living Council (SILC) and the Department of Public Health and Human Services- Disability Employment and Transitions Division to develop and implement a SPIL that will: Make independent living a reality for Montanans with disabilities by promoting and practicing a philosophy of consumer control, development of a network of peer services, self-determination, self-help, equal access, and advocacy in order to maximize independence, integration and full inclusion of person with disabilities into mainstream Montana.

The goals of the SILS are:

Goal Name: Consumer Services

Goal Description: Montana's four Centers for Independent Living (CILs) will provide effective, high-quality independent living (IL) services statewide to as many people with disabilities as possible each year.

Goal Name: Systems Change

Goal Description: Montana's CILs and SILC will advocate improved compliance with the Olmstead decision by assisting in the implementation of the Money Follows the Person (MFP) and Community First Choice Option (CFCO) by actively partnering with allied groups and Montana Department of Public Health and Human Services (DPHHS) and Disability Employment and Transitions Division (DETD) to transition a minimum of 40 people from nursing homes and other institutions into the community each year.

Goal Name: Outreach to Underserved Population

Goal Description: Promote community participation of the underserved population of people with disabilities by facilitating culturally appropriate IL services for youth, people seeking employment, Native Americans and other underserved populations.



Each of the CILs have a goal or priority area that addresses outreach activities to underserved populations.

Goal Name: Affect Public Policy through Education, Training and Awareness

Goal Description: National, state and local legislators including policy makers are educated and informed about independent living and disability issues.

Goal Name: SILC Member Involvement

Goal Description: SILC members are engaged in opportunities and activities within their communities to increase the knowledge of disability issues and increase the awareness of the needs of accessibility for people with disabilities.

The four CIL directors submitted their centers' three year plans which support most of the state's plan for independent living.

The mission of the Living Independently for Today and Tomorrow, Inc. (LIFTT) is a Montana non-profit organization committed to empowering persons with disabilities to live freely and equally in South-eastern Montana through the provisions of independent living services which reduce societal barriers.

The following are LIFTT's goals:

Goal One: Communication- LIFTT will construct and update an accessible webpage

Goal Two: Funding- LIFTT will develop a workable financial plan.

Goal Three: Accessibility- LIFTT will provide accessibility utilizing best practice.

Goal Four: Programmatic- LIFTT's System Change Advocate will develop through communication and through focus groups six systems change activities annually.

Goal Five: Education- Collaborate with other Independent Living Centers to improve education and training for staff and board members.

Goal Six: Consumer Control- LIFTT will educate persons with disabilities on how to be their own advocates and open doors to provide leadership roles within the CILs and wider communities.

Goal Seven: Youth- Recruit youth to participate in LIFTT's youth group across the 18 county service areas.

Montana Independent Living Program (MILP)

MILP is a not-for-profit agency striving to support the development and expansion of community based services which directly facilitate independence, productivity and quality of life for people with disabilities.

Goal One: Provide core services to 450 consumers in MILP's 14 county service area.

Goal Two: Increase outreach within MILP's service area to unserved/underserved youth with disability.

Goal Three: Continue to augment information and referral services to Social Security eligible individuals.

Goal Four: Continue to increase health care promotion through community education/public information in health and recreation facilities.

Goal Five: Continue to maintain MILP's role as a disability resource for technical assistance, training and systems change/advocacy in MILP's services area.

Goal Six: Continue and maintain MILP's various transportation related partnerships and capacity option development.

#### North Central Independent Living Services (NCILS)

This organization is established for the purpose of providing access to a more independent lifestyle for person with disabilities through advocacy, public education, coordination of services, and information as directed by consumer need. The corporation shall be guided by the principles of consumer control which includes as much independence for the person as possible, the chance for a person to experience life to its fullest potential, to advocate for barrier free communities, to give accountability and credibility to a person's own choice with a right to independence. It is our purpose to assure that persons with disabilities are recognized as individuals with the same basic rights, needs and desires as any non-disabled individual. These rights include but are not limited to: achieving as much physical and psychological independence as their disability will allow; participating in social, recreational, political, religious and community activities and events; accessibility to public transportation, housing, educational and employment opportunities.

Goal One: Core Services

Goal Two:Community Development

Goal Three: Task Forces that advocate for and promote needs identified through the Independent Living Symposium

Goal Four:Provide services to 100 new individuals with disabilities through the development of a Consumer Service Record for each year of the Plan.

Goal Five: NCILS will be involved in local advocacy issues throughout each year of the Plan with activities in addressing individual consumer needs as defined by the Consumer.

Goal Six: Provide Outreach to Underserved Populations

Goal Seven: Systems Advocacy Activities

Goal Eight: NCILS will complete a training calendar for staff and consumers

Summit Independent Living Center

Summit's mission is to promote community awareness, equal access and the independence of people with disabilities through advocacy, education and the advancement of civil rights.

Goal One: Advocacy to improve community resources and services for people with disabilities.

Goal Two: Transportation

Goal Three: Housing and Community Access

Goal Four: Youth and Education

Goal Five: Employment

Goal Six: Health, Adaptive Equipment and Personal Assistance

Goal Seven: Community Participation and Peer Support

Goal Eight: Finances

Goal Name: Consumer Services

Goal Description:

Montana's four Centers for Independent Living (CILs) will provide effective, high quality independent living (IL) services statewide to as many people with disabilities as possible each year.

Goal Name: Systems Change

Goal Description:

Montana's CILs and the SILC will advocate improved compliance with the Olmstead decision by assisting in the implementation of the Money Follows the Person (MFP) and Community First Choice Option (CFCO) by actively partnering with allied groups and Montana Department of

Public Health and Human Services (DPHHS) to strengthen community living resources and employment opportunities statewide.

Goal Name: Outreach to Underserved Populations

Goal Description:

Promote community participation of the underserved population of people with disabilities by facilitating culturally appropriate IL services for youth, people seeking employment, Native Americans and other underserved populations.

Goal Name: Affect Public Policy through Education, Training and Awareness

Goal Description:

National, state and local legislators including policy makers are educated and informed about independent living and disability issues.

Goal Name: SILC Member Involvement

Goal Description:

SILC members are engaged in opportunities and activities within their communities to increase the knowledge of disability issues and increase the awareness of the needs of accessibility for people with disabilities.

## 1.2 Objectives

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

Goal(s) from Section 1.1	Objective to be achieved	Time frame start date	Time frame end date
Mission Statement Consumer Services	Objective 1: Each year the network of CILs will provide IL services to a minimum of 20% new consumers based on each center's 704 Report. This comparison will be made by reviewing the statewide Consumer Service Record (CSR) count reported on the four CILs' quarterly reports.	10/01/2013	09/30/2016
Mission Statement Consumer Services	Objective 2: The CILs will continue to collaborate with local, tribal and state organizations on issues that are identified by consumers, e.g. housing, transportation, social security and health care resources. CIL directors will communicate to the	10/01/2013	09/30/2016

	SILC about the collaborative efforts and outcomes of these activities to address consumers' needs. The information is documented in the contractual quarterly reports which are submitted to the DSU, as well as the 704 Reports.		
Mission Statement  Systems Change	Objective 1: All four Montana CILs will collaborate with Home and Community Based Services (HCBS) waiver teams, Area Agency on Aging teams, and other identified MFP partners, such as Addictive and Mental Disorders Division (AMDD) and Developmental Disabilities Program (DDP) to transition a minimum of 40 people from nursing homes and other institutions into the community each year.	10/01/2013	09/30/2016
Mission Statement  Systems Change	Objective 2: All four Montana CILs will actively participate and advocate consumer participation in the development and implementation of the CFCO to help strengthen self-direction and enhance services within the Medicaid Personal Assistance Program. This will ensure that the consumer has control of the person centered plan in the development and implementation of the Community First Choice Option.	10/01/2013	09/30/2016
Mission Statement  Systems Change	Objective 3: All four Montana CILs and SILC promote accessible and affordable housing such as: ensuring that ongoing Housing Bridge funding is available for individuals transitioning from institutions into community settings each year through the MFP program.	10/01/2013	09/30/2016
Mission Statement  Systems Change	Objective 4: All four Montana CILs and SILC will advocate for new funding sources each year to increase available and accessible transportation options for local and tribal transportation providers to improve consumers' mobility within their communities .	10/01/2013	09/30/2016
Mission Statement  Systems Change	Objective 5: SILC in collaboration with all four Montana CILs will identify stakeholders, partners, families, consumers and sheltered workshop participants to develop dialogue focusing on the goal to move away from the sheltered workshop models of employment beginning the first year of the SPIL.	10/01/2013	09/30/2014

Mission Statement  Outreach to Underserved Populations	Objective 1: The first year of the plan the SILC will invite representatives from one of the underserved groups and from a specific disability population to present at a SILC meeting to provide various methods of adapting the four core services in a culturally appropriate manner to serve each population.	10/01/2013	09/30/2014
Mission Statement  Outreach to Underserved Populations	Objective 2: Each year of the plan the CIL directors will continue to describe outreach activities to underserved populations in their quarterly reports with an annual summary report to the SILC.	10/01/2013	09/30/2016
Outreach to Underserved Populations	Objective 3: Throughout the plan, a SILC representative will serve on the Native American Task Force and Youth with Disabilities Task Force. This representative will report to the SILC at least once a year to provide guidance on underserved populations about ways to enhance outreach and services to tribal communities and youth with disabilities. Once a year the IL Program Manager will evaluate the efforts of IL services and outreach to the underserved populations and report to the SILC.	10/01/2013	09/30/2016
Mission Statement  Outreach to Underserved Populations	Objective 4: The CILs will promote employment of people with disabilities through services such as: Work Incentives Planning and Assistance (WIPA), Living Well with a Disability and Working Well with a Disability classes, Americans with Disabilities Act (ADA) training, the Medicaid for Workers with Disabilities Program and collaboration with other employment resources. The CILs will provide information and referral regarding employment resources to consumers and potential employers.	10/01/2013	09/30/2016
Mission Statement  Outreach to Underserved Populations	Objective 5: Each year of the plan the SILC will promote transition resources for youth with disabilities such as: Montana Youth Leadership Forum (MYLF), MYTransitions annual conference and encourage State departments to provide job shadowing opportunities during Disability Mentoring Day.	10/01/2013	09/30/2016
Mission	Objective 1: The SILC in partnership with the CILs will develop a candidate survey based on the	10/01/2013	10/30/2014

Statement  Affect Public Policy through Education, Training and Awareness	legislative priorities and issues identified at the 2013 IL Symposium. The surveys will be distributed in March 2014, upon closing of candidate filing. The results will be compiled into an informative report. The purpose of this report is to educate the candidates and increase IL community's awareness of the candidates' position on issues outlined in the survey, regarding the needs of people with disabilities and the available services to meet those needs. This information would be shared in an IL voter guide for the 2014 General Election. Appropriate funding sources will be used for this objective.		
Mission Statement  Affect Public Policy through Education, Training and Awareness	Objective 2: The SILC will reach out to state agencies and division administrators and their staff through education, advocacy and training on current and emerging topics that affect people with disabilities.	10/01/2013	09/30/2016
Mission Statement  Affect Public Policy through Education, Training and Awareness	Objective 3: The SILC will collaborate with the Montana network of Centers for IL (CILs) in partnership with the Centers' Legislative and Advocacy Committee on advancing strategies with local, state and national policy makers. These strategies will create and sustain opportunities for people with disabilities to pursue and acquire full participation in all aspects of life in their local communities of choice.	10/01/2013	09/30/2016
Mission Statement  SILC Member Involvement	Objective 1: SILC members are involved with at least five local, tribal, state and/or national disability issues or activities each year to help educate and inform the public, IL consumers, future IL consumers, policy makers and legislators about needs and issues facing people with disabilities living, working and recreating in Montana. They will report progress during one quarterly SILC or another disability organization meeting.	10/01/2013	09/30/2016
Mission Statement  SILC Member Involvement	Objective2: SILC members will serve on at least one IL task force, disability organization or SILC committee to obtain information. SILC members will make contacts to assist in being an independent living resource. SILC members will share information and report progress at SILC meetings	10/01/2013	09/30/2016

	about local disability resources and access issues. This information may include strategies to address and identify methods to resolve issues.		
Mission Statement  SILC Member Involvement	Objective 3: Within the first year of the plan, the SILC will develop a schedule for training on IL history, philosophy, practices and ways to be actively involved with the SILC's activities. At least once during the plan, the SILC, CILs and the DSU will also participate in training and collaborative meetings to educate one another on what services are provided to improve the lives of people with disabilities living in Montana.	10/01/2013	09/30/2014
Mission Statement  SILC Member Involvement	Objective 4: The SILC will continuously gather input from the community, stakeholders and other organizations through the use of SILC meetings, the annual statewide satisfaction survey/needs assessment, public hearings and other avenues. The SILC will investigate best practices that could be utilized to improve IL services and community resources in Montana.	10/01/2013	09/30/2016
Mission Statement  SILC Member Involvement	Objective 5: The SILC will work together with the DSU and the four CILs to educate the public; interact with human services agencies; city offices; county offices; tribal programs and state offices, including members of legislature concerning the SILC and IL services statewide. The SILC will distribute SILC brochures, maintain a webpage through the Disability Employment and Transitions Division (DETD), DPHHS website and use alternate formats in an ongoing awareness to educate the public on IL issues, for example during Legislative Day and Rally Day.	10/01/2013	09/30/2016
Mission Statement  SILC Member Involvement	Objective 6: The SILC considers marketing/public relations to be an ongoing awareness event to educate the public on the ever-changing issues faced by the disability community. The SILC will achieve this public education event by providing information about, and awareness of, the existence of resources through the distribution of SILC brochures, maintenance a SILC webpage, statewide announcements of SILC meetings, use of social media and alternative formats of this information at a variety of venues.	10/01/2013	09/30/2016
Mission	Objective 7: The SILC will explore and implement	10/01/2013	09/30/2014



Statement  SILC Member Involvement	options to develop its own webpage separate from the DPHHS website by the end of the first year of the plan.		
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## 1.2 Objectives

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.

- Identify the populations to be designated for targeted outreach efforts

The populations identified as underserved in Montana are youth, people seeking employment, Native Americans and other underserved populations.

- Identify the geographic areas (i.e., communities) in which the targeted populations reside

Youth (age 18-28) are recognized as an underserved populace and the SILC, CILs and the DSU believe that it is important to outreach to youth in order to develop future Montana leaders. Also the perspective of youth is different from the older population and the message and programs of IL need to be modified to relate to youth, particularly in the circumstance of transitioning from high school to the adult service system and employment. Montana's disability community has indicated issues which impede persons with disabilities who are considering employment. Issues noted are obtaining information on Social Security work incentives, retaining medical coverage including providing information on Medicaid for Workers with Disabilities Program and accessible transportation. Approximately 6% of Montana's population are American Indians with 60% of this population residing on reservations and the remainder living in urban and rural areas outside of the reservations. Montana has seven federally recognized reservations and one state recognized reservation. Most of the reservations are located in the northern half of the state with the Northern Cheyenne and Crow Reservations located in the southeastern part of Montana.

- Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed

The distribution of Montana's Native American population reflects the location of seven reservations with respect to each CIL's service area. NCILS has four reservations within its service area, LIFTT has two, Summit has one, while MILP has none. Montana's commitment to serving Native Americans is reflected in the fact that two of the CILs with a reservation within their service area have a branch office located on a reservation. Summit has a branch office in Ronan on the Flathead Reservation, NCILS serves the Fort Peck Reservation from their branch office in Poplar. Also all four CILs collaborate with urban Indian centers to provide IL services for the American Indian population living in urban areas.

The Montana Native American Independent Living Task Force addresses several priorities identified by Native Americans who have disabilities or family members with disabilities. SILC

members meet at least once during the three year SPIL on some reservation to share information and resources about independent living and gather concerns and issues identified by community members regarding lack of services and accessibility.

### 1.3 Financial Plan

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

Complete the financial plan tables covering years 1, 2 and 3 of this SPIL. For each funding source, provide estimated dollar amounts anticipated for the applicable uses. The financial plan table should include only those funding sources and amounts that are intended to support one or more of the objectives identified in section 1.2 of the SPIL. To the extent possible, the tables and narratives must reflect the applicable financial information from centers for independent living. Refer to the SPIL Instructions for additional information about completing the financial tables and narratives.

Year 1 - 2014 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	10958	206890	0	81462
Title VII Funds Chapter 1, Part C	0	0	810462	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)	0	0	0	
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	8830	0	0	
Other Federal funds - other	0	20000	0	
Non-Federal funds - State funds			0	
Non-Federal funds - Other			0	
State Funds- Match	3608	22988	0	9051

State Funds-GF for IL Services	0	474543	0	
Total	23396	724421	810462	90513

Year 2 - 2015 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	10958	206890		81864
Title VII Funds Chapter 1, Part C			857441	
Title VII Funds 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)	8830			
Other Federal funds - other		20000		
Non-Federal funds - State funds				
Non-Federal funds - Other				
State Funds- Match	3608	22988		9096
State Funds-GF for IL Services		488395		
Total	23396	738273	857441	90960

Year 3 - 2016 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	10958	206890		81864

Title VII Funds Chapter 1, Part C			857441	
Title VII Funds 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)	8830			
Other Federal funds - other		20000		
Non-Federal funds - State funds				
Non-Federal funds - Other				
State Funds- Match	3608	22988		9096
State Funds-GF for IL Services		488395		
Total	23396	738273	857441	90960

### 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.

The CILs goals incorporated into this SPIL are supported through the contracts for services from Part B, including match, listed under IL Services; the contracts for services from the state general fund listed under IL services; Part C funds listed under General CIL Operations. The goals supported by the Part B and General Fund dollars are those where it has been noted that a SILS goal has incorporated a CIL goal at least partially into a SILS goal. Part C funds are the primary funding source for supporting the operation of CILs and CILs goals.

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.

During allocation of state funding, issues such as imbalance of federal funding and underserved populations in the service areas are taken into consideration in order to try to equalize accessibility to IL services throughout Montana. This method has led to near equal funding levels from the core funding sources for CILs in Montana.

Part C funds are directly granted by RSA to all four Montana IL Centers. The state unit does not have the required funds to participate in the matching mechanism detailed in the statute; therefore, Part C grants are made directly to the CILs. Summit and MILP receive the majority of the available Part C funds available to Montana.

The following estimated projections are made for the Centers for Part B, Part C and State IL General Funds, actual distribution may vary as described previously in this plan. ( Section 1.3A)

Due to the sequestration of Part C funding for the four CILs during FY'14, the first year of the three year SPIL will have less funding available in the Part C monies and some GF fund monies will be reallocated to even out funding among the CILs.

Beginning this new three year SPIL starting October 1, 2013, the Montana DSU, Disability Employment and Transition Division, will provide \$20,000 from the SSA program income, \$10,000 to the LIFTT and \$10,000 to NCILS centers for independent living. In addition, for each year of the SPIL the allocated independent living state general funds will be provided through a contract by the Montana DETD as follows: \$186,556 for LIFTT, \$93,012 for MILP, \$175,572 for NCILS, and \$19,403 for Summit. These funds will be used for the core IL services and to provide services for identified underserved populations including Native Americans with disabilities, youth with disabilities, and person with disabilities seeking employment. In addition, for each year of the SPIL, the Montana SILC and DSU (DETD) have designated Part B monies as follows: \$101,951 each for LIFTT and NCILS and \$22,988 each for MILP and Summit. Finally, the SILC, CILs and DSU recognize the importance of providing IL services to people with disabilities throughout the state. Therefore, the Part C monies will be used to address these services. Part C is allocated by the federal government and due to the FY'14 sequestration, the first year of the SPIL will be less than the last two years. The total Part C amounts for the first year are as follows: \$95,214 for LIFTT, \$267,721 for MILP, \$106,199 for NCILS and \$341,331 for Summit.

The second and third years of the GF contracts will be as follows: \$188,657 for LIFTT, \$97,338 for MILP, \$177,647 for NCILS and \$24,753 for Summit. For Part B, the contract amounts will be \$101,951, for LIFTT and NCILS and \$22,988 for MILP and Summit. The Part C amounts will be \$100,564 for LIFTT, \$283,302 for MILP, \$112,379 for NCILS and \$361,196 for Summit.

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.

Office supplies, access to major office equipment (copier, fax, scanner, laptop computer, projector, etc.) and access to DSU training are made available as in-kind contributions to support the program manager when carrying out activities to support the SILC and SPIL activities.

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

Should additional funding for IL services become available during the course of the plan, the first priority would be maintaining equal funding among the CILs in the three core funding areas. The second priority, would be to maintain adequate funding for the SILC resource plan. The third priority would be to support the biennial independent living symposium for systems advocacy and planning. The fourth priority would be distributing all remaining funding equally among the four CILs. If funds received have earmarked purposes, the funds will be used for the

designated purposes and not distributed per the preceding priorities. Likewise, if funding is reduced, IL services will be decreased accordingly.

#### 1.4 Compatibility with Chapter 1 of Title VII and the CIL Work Plans

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 purpose of Chapter 1 of Title VII is to promote a philosophy of independent living, including a philosophy of consumer control, peer support, self-help, self-determination, equal access, and individuals and systems advocacy in order to maximize the leadership, empowerment, independence and productivity of individuals with disabilities, and the integration and full inclusion of individuals with disabilities into the mainstream of American society. Goal one of this plan supports maximizing the IL services in Montana. The four CILs will provide effective high quality IL services statewide to people with disabilities each year. The CILs will continue to collaborate with local, tribal and state organizations on issues that are identified by consumers. CIL directors will communicate to the SILC about the collaborative efforts and outcomes of these activities to address consumers' needs. Goal Two, Objectives One and Two address systems change along with implementing integration and inclusion of individuals with disabilities in mainstream of society: The SILC and the CILs will advocate improved compliance with the Olmstead decision by assisting in the implementation of the Money Follows the Person (MFP) and Community First Choice Option by partnering with allied groups and Montana DPHHS to strengthen community living resources and employment opportunities statewide. The CILs and SILC promote accessible and affordable housing such as: ensuring that ongoing Housing Bridge funding is available for individuals transitioning from institutions into community settings each year through the MFP program as mentioned in Goal Two, Objective Three.

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.

The SILC incorporated a number of the CIL goals into SILS goals and those instances are noted in the goal section. Two CIL directors were members of the SPIL writing team and assisted with writing SILS goals. These representatives got input from their IL community and represented the views of the other directors as well as his own on the committee. The four CIL directors submitted their center's three year plan to the SILC staff and DSU. Some of the SILC members reviewed the three year plans and those SILC members who were on the SPIL committee incorporated some of the priorities and objectives of each CIL into the SPIL. As mentioned earlier, all four of the CILs described outreach and activities to underserved populations. The four CILs listed the IL services they would offer to consumers, including systems advocacy. Two CILs are actively involved in the implementation of the MFP program and Community First Choice Option (CFCO). Their activities and involvement of these two programs were listed in their three year plans as objectives or priorities. The awareness of IL resources and services are an important component of the work that the SILC and CILs do. In a state as large and sparsely populated as Montana, it is critical to inform people with disabilities and community members of

the IL services that the CILs provide and the purpose and activities of the SILC. Therefore, the SILC and all four CILs realize that public relations and marketing strategies are one way to reach out to people with needs and increase IL options in communities throughout Montana. Accessibility in one's house and community is a priority that the four CILs and the SILC address in the SPIL and each center's plans.

### 1.5 Cooperation, Coordination, and Working Relationships Among Various Entities

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 SILC members are encouraged to visit CILs in their community to increase their knowledge about IL services and philosophy. Information on CILs in general and from each CIL is provided as part of the orientation process for new SILC members and is available to all SILC members. While one CIL director is a member of the SILC, all CIL directors are invited to all general SILC meetings. All CIL directors are involved in at least one committee of the SILC.

The DSU IL program manager visits each CIL at least every other year. The DSU IL program manager is willing to attend CIL director meetings when invited. The CILs, SILC and DSU program manager are all involved with planning for IL symposiums, legislative day, poster day, and other statewide activities. The DSU, with SILC input, contracts with CILs to provide IL services Peggy Williams staffs the Montana Vocational Rehabilitation Council (MVRC) and assists with coordination of the SILC with the council and MVRC.

The SILC maintains a representative on the MVRC which allows for a direct conduit of VR issues into the SILC.

The SILC maintains an ex-officio member of a non DSU state agency which allows for direct input into the SILC from another state agency perspective. The SILC in collaboration with all four Montana CILs will identify stakeholders, partners, families, consumers and sheltered workshop participants to develop dialogue focusing on the goal to move away from the sheltered workshop models of employment beginning the first year of the SPIL as reflected in Goal 2, Obj. 5. and as mentioned in Goal 1, Obj. 2, the CILs' staff will collaborate with local, tribal and state organizations that are identified by consumers. The CILs' staff and SILC members will work with allied groups in Montana and DPHHS to strengthen community living resources and employment opportunities statewide in order to accomplish Goal 2. The SILC will invite representatives from one of the underserved and from a specific disability population to present at a SILC meeting in order to learn how to improve IL services to these populations. Another example of maximizing working relationships is that a SILC representative will serve on the Native American Task Force and Youth with Disability Task Force along with other IL task

forces. Members of these various task forces are from a diverse representation of organizations and disability populations.

### 1.6 Coordination of Services

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.

The CIL directors, SILC members, and DSU staff are actively involved with a number of disability organizations and coalitions of organizations, and through these contacts the IL network becomes aware of services provided through other agencies. Reports at the SILC meetings become a forum for sharing issues related to duplications of services and developing opportunities to develop approaches that complement services within the network through cooperation and collaboration. Specific connections with other networks that create communication channels are:

A representative of the SILC sits on the state VR Council and one of the members of that Council is a staff of Special Education section of the Office of Public Instruction and there is significant opportunity to obtain information on Special Education and development disabilities through the interaction on this council.

The program manager's office is housed in the Department of Public Health and Human Services and is on the primary email distribution lists for sharing information within the department. When information of significance to services provided by the CILs comes through the system, the program manager forwards the information to the CILs and the SILC. The program manager uses her position within the Department as a liaison for the CILs upon request by the CILs or SILC.

CIL staff members sit on local advisory councils of local mental health services authority organizations, which assist in the management of regional public mental health care.

Some SILC members and CIL staff attend and present at the local Transportation Advisory Councils and housing councils. A few CIL staff are members of the State Transportation Task Force.

### 1.7 Independent Living Services for Individuals who are Older Blind

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 SILC has had discussions and presentations by the program administrator of the Older Individuals who are Blind Program for consideration of incorporating into, and describing in, the



state plan any new methods or approaches for the provision of IL services to older individuals who are blind.

## Part II: Narrative: Section 2 - Scope, Extent, and Arrangements of Services

### 2.1 Scope and Extent

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).

<b>Table 2.1A: Independent living services</b>	<b>Provided by the DSU (directly)</b>	<b>Provided by the DSU (through contract and/or grant)</b>	<b>Provided by the CILs (Not through DSU contracts/grants)</b>
Core Independent Living Services - Information and referral	No	Yes	Yes
Core Independent Living Services - IL skills training	No	Yes	Yes
Core Independent Living Services - Peer counseling	No	Yes	Yes
Core Independent Living Services - Individual and systems advocacy	No	Yes	Yes
Counseling services, including psychological, psychotherapeutic, and related services	No	Yes	Yes
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)	No	Yes	Yes
Rehabilitation technology	No	Yes	Yes
Mobility training	No	Yes	Yes
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	No	Yes	Yes
Personal assistance services, including attendant	No	Yes	Yes

care and the training of personnel providing such services			
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	No	Yes	Yes
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	No	Yes	Yes
Education and training necessary for living in the community and participating in community activities	No	Yes	Yes
Supported living	No	Yes	Yes
Transportation, including referral and assistance for such transportation	No	Yes	Yes
Physical rehabilitation	No	Yes	Yes
Therapeutic treatment	No	Yes	Yes
Provision of needed prostheses and other appliances and devices	No	Yes	Yes
Individual and group social and recreational services	No	Yes	Yes
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	No	Yes	Yes
Services for children with significant disabilities	No	Yes	Yes
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	No	Yes	Yes
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar	No	Yes	Yes

services in the future			
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	No	Yes	Yes
Other necessary services not inconsistent with the Act	No	Yes	Yes

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

Because funding for IL services in Montana is inadequate to provide the same level of quality services across the full scope of IL services listed above, Montana prioritizes the support and strengthening of the four core IL services. The development of strong personal advocacy skills and a strong advocacy network for disability issues is particularly emphasized. Other services are available and provided, but the core services are prioritized. In addition, there is an emphasis in outreaching to the underserved populations described in 1.2B. The populations identified as underserved in Montana are Native Americans with disabilities, youth with disabilities, and persons with disabilities considering employment.

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.

Indicate N/A if not applicable.

Montana allows services providers to charge consumers for the cost of services and to consider the ability of individuals consumers to pay for the cost of IL services. However, it does not require them to do so and at this time no CILS require a financial need test for the provision of services. Should a CIL indicate that they will be charging consumers for services, they will be required to provide attachments with the following documentation:

-Procedures in place to 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.

During site reviews the service providers that have indicated that they plan to charge consumers will have records reviewed related to compliance with the above requirements. One example is the registration fee charged to participate in a workshop.

## 2.2 Arrangements for State-Provided Services

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.

Montana provides services to individuals with disabilities through contracts for Part B funds and targeted general funds. Contracts are developed to ensure that federal requirements related to the operation of CILs and providing IL services to consumers are agreed to by the CILs. The contracts are also reviewed by SILC members prior to completion of the contracts. In order to monitor for compliance with the terms of the contract, the DSU program manager and a SILC representative conduct periodic site reviews and auditors from the Department of Public Health and Human Services conduct periodic reviews that involve reviewing the financial procedures of the CILs.

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.

The CILs determine consumer eligibility. Language that reflects federal requirements for eligibility are included in the contracts and the determination that the CILs are determining eligibility based on the guidelines is reviewed in site visits.

## **Part II: Narrative: Section 3 - Design for the Statewide Network of Centers**

### **3.1 Existing Network**

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.

As of FY'2013, the existing network of CILs consists of four CILs and seven branch offices. The CILs provide IL services to the entire state of Montana capitalizing on branch offices to provide core IL services to individuals as well as system change advocacy, education and awareness services. All of the CILs receive a mix of Part B, state general fund (through contract), and Part C funds. Estimated distribution of state funds for Part B and general funds are included in Section 1.3 Financial Plan.

The service area for LIFTT consists of the following eighteen counties in the southeastern part of Montana: Big Horn, Carbon, Carter, Custer, Dawson, Fallon, Garfield, Golden Valley, McCone, Musselshell, Powder River, Prairie, Richland, Rosebud, Stillwater, Treasure, Wibaux and Yellowstone. Part C monies support program costs in LIFTT's main office in Billings, which is housed in Yellowstone County. The LIFTT service area includes two American Indian Reservations, the Northern Cheyenne and Crow.

Summit's services are available to residents of Missoula, Ravalli, Mineral, Lake, Sanders, Flathead and Lincoln Counties in western Montana. Missoula and Kalispell are the primary urban areas in this region, while most of the remaining service area is characterized by small towns and sparsely populated rural areas. Flathead, Missoula and Ravalli Counties are among the fastest growing areas in the state, and overall Summit's seven-county service area contains nearly 1/3 of the state's population. Summit is headquartered in Missoula with branch offices in Hamilton, Ronan and Kalispell. This service area includes the Flathead Indian Reservation, which is the tribal home of the Salish and Kootenai Tribes, located in Lake and Sanders Counties. The Hamilton office is responsible for services in Ravalli County, and the main office in Missoula primarily serves Missoula and Mineral Counties. Staff members from the Missoula office also travel to outlying counties to serve consumers in the Self Directed Personal Assistance Services program, as well as to assist with delivery of other independent living services as appropriate.

NCILS conducts activities to increase the number of people served who are members of populations that are currently underserved which includes any consumer living within the seventeen county service area. NCILS provides IL services within the following seventeen Montana counties of Blaine, Cascade, Choteau, Daniels, Fergus, Glacier, Hill, Judith Basin, Liberty, Petroleum, Phillips, Pondera, Roosevelt, Sheridan, Teton, Toole, and Valley, and on four Indian Reservations which include the Blackfeet Indian Reservation with the counties of Glacier/Pondera, Fort Belknap Indian Reservation with the counties of Blaine/Phillips, Fort Peck

Indian Reservation within the counties of Roosevelt/Valley/Daniels, and Rocky Boy's Indian Reservation with the counties of Hill/Choteau.

NCILS maintains two branch offices with one of the offices in the town of Glasgow within Valley County, and the second office in the town of Poplar located on the Fort Peck Indian Reservation within the counties of Roosevelt/Daniels/Valley. Staff members from the NCILS offices provide outreach to the underserved populations which include the Montana Youth Leadership Forum (MYLF) office that is located in Lewis and Clark County but provides services for youth throughout the state.

MILP has four offices: Helena, Butte, and Bozeman, providing services to consumers living in fourteen counties throughout Montana. The main office in Helena provides services in Broadwater, Jefferson, and Lewis and Clark Counties; the Butte branch office provides services in Beaverhead, Deer Lodge, Granite, Jefferson, Madison, Silver Bow and Powell Counties; and the Bozeman branch office provides services in Gallatin, Meagher, Park, Sweet Grass, Madison and Wheatland Counties.

MILP has developed relationships with the urban Indian centers located in Helena and Butte, which demographically have 4,200 citizens who could access those centers. Given the high incidence of disability among American Indians, collaborative outreach between the urban Indian and independent living centers could improve services to the American Indian population. Of the 147,000 square miles in Montana, MILP's service area covers approximately 32,000 square miles (22%). MILP's service area (14 counties) serve a population of 260,250 (27%).

### 3.2 Expansion of Network

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 plan for further expansion of the network of CILs is to build on the existing branch office strategy versus development of a new CIL since all of the state's 56 counties are included in the service area of the four existing centers. Each of Montana's four CILs will determine the best course of action to address unmet needs within its service area, whether by establishing a new branch office or by developing the capacity of existing offices. This SPIL does not designate specific geographic regions of the state as underserved but rather focuses on underserved populations, to include youth with disabilities, people with disabilities seeking employment, and American Indians. Any new funding available for expansion of the network of CILs will be used to equalize funding among the Centers. Montana DSU/SILC will provide existing Part C centers that comply with the standards and assurances in section 725 with the level of funding each center received for the previous fiscal year. MT DSU/SILC will provide those existing Part C centers with a cost-of-living adjustment (COLA). MT will distribute excess funds over COLA to the existing Part C centers since all geographic areas are currently served by a Part C center.

### 3.3 Section 723 States Only

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.

N/A

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.

N/A



## **Part II: Narrative: Section 4 - Designated State Unit (DSU)**

### 4.1 Administrative Support Services

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.

Administrative staff support for the SILC is provided by designated state unit with Title VII Part B funds (including match). The staff support position is responsible for providing staffing activities to the SILC, which includes coordination and hosting meetings; support of SILC committees; assisting with management and execution of the SPIL; document development; and to serve as liaison to the SILC, DSU and CILs. The IL program manager is the primary staff person involved with providing the above support: however other DSU staff members provide support based on need and expertise.

The DSU program manager is assigned to assist the SILC in monitoring implementation of the SPIL. DSU staff assists in arranging for SILC meetings, including committee meetings, and providing minutes of the meetings.

The DSU program manager assists with drafting correspondence and other documents. However, because the documents represent the SILC, they are reviewed, approved and signed by the chair of the SILC.

A SILC Representative may accompany the IL program manager on the site visits to monitor center services and activities in relation to progress on meeting SPIL objectives. The SILC member does not conduct contract compliance activities but focuses on progress on SPIL implementation by the Center. This activity cost will be covered by other SPIL activities.

The DSU program manager reviews possibilities for additional funding for the SILC, CILs and DSU to support IL activities and provides suggestions and support in pursuit of additional funding, if time is available. With SILC input, DSU staff develops SILC materials for use in activities such as orientation of new members.

With SILC input, DSU staff develop marketing strategies to promote the SILC and SILC activities, i.e. logo, brochure, public information materials, etc.

With regard to resource development, ideas for securing additional funds occur in committees and sometimes responsibility is assigned to committees. Occasionally ideas develop in the full SILC. The committee or SILC may develop a plan for resource development. The most common activity involving the program manager for resource development is drafting grant applications. In general, then one of the CILs is assigned as the applicant for the grant and that CIL reviews the application before it is sent in. Funds are not received by SILC at this time; either the DSU or a CIL is the recipient of the funds. For instance legislative general funds are always allocated to the DSU for distribution to the CILs.

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

N/A

## **Part II: Narrative: Section 5 - Statewide Independent Living Council (SILC)**

### 5.1 Resource plan

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.

- Refer to the SPIL Instructions for more information about completing this section.

For more information click the icon.

The sources of funding for the below budget are from (Part B+ match) and (Section 110 + match). The Part B amount varies each year of the SPIL, but the Section 110 + match is expected to stay the same throughout 2014-16. In addition to the above budget, there are in-kind contributions from the DSU. The SILC has no staff, but benefits from the efforts of the DSU program manager and other support provided through Part B funds assigned to the DSU for administration expenses of Part B grant. While the SILC resource plan seems low, a large portion of the “other SPIL activities” budget is the program manager salary and fringe. A significant amount of the program manager’s time is dedicated to activities requested by the SILC such as: meeting arrangements, etc.

Sources and Amounts (from the SILC Resource Plan)- Year 1

Title VII Funds, Chapter 1, Part B

Non-Federal Funds, State Funds (Title VII Part B State GF match)

Section 110 (a)(18) of the Act (Innovation and Expansion)

Sources and Amounts (from the SILC Resource Plan)- Year 2

Title VII Funds, Chapter 1, Part B

Non-Federal Funds, State Funds (Title VII Part B State GF match)

Section 110 (a)(18) of the Act (Innovation and Expansion)

Sources and Amounts (from the SILC Resource Plan)- Year 3

Title VII Funds, Chapter 1, Part B

Non-Federal Funds, State Funds (Title VII Part B State GF match)

Section 110 (a)(18) of the Act (Innovation and Expansion)

The following is the budget for each of the three years of the SPIL:

Meeting Expenses- \$14,021

Consulting- \$2,250

Supplies-\$200

Communications-\$1,000

Travel-\$4,425

Other- \$1,500

Total: \$23,396

During the second and third year of the SPIL, the total budget amounts will be the same as the first year.

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.

The funds supporting the SILC resource plan will be handled through a separate account number with the DSU fiscal operation. While approval within the fiscal systems is provided by DSU personnel, the SILC and specifically the SILC chair or chair's designee are consulted and provide guidance on expenditures and documentation of the SILC chair's involvement in authorization is maintained. Also, the SILC chair or their designee reconciles recorded expenditures with the approval of expenditures on at least a quarterly basis. The SILC chair is responsible for the appropriate use of the funds and ensuring that expenditures are not made beyond the budget for SILC resources.

The CILs have plans for a symposium which will take place September 17-18, 2013 in Great Falls, MT. The CIL Legislative/Advocacy Committee has taken a lead in the planning and development of the Symposium and IL Task Forces.

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

In order to access the support of the DSU fiscal services to support the SILC resource plan, the SILC accepts the state rates for mileage, meals, lodging and council member reimbursement.

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

All resources for the SILC resource plan come from Part B funds, Section 110 funds, or state matching funds. Since the state legislature only meets every two years, it is only possible to project budget allocations for two years. The state matching funds have been approved for the first year of the plan. The other funds are expected federal allocations.

Decrease of funding may impact the IL services offered with the CILs. These budget cuts may come from decreases in available federal funds. For instance: During FY'14 the federal sequestration process will come into effect and a 5.5% decrease of funding is expected for the IL Part C monies.

## 5.2 Establishment and Placement

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies. Refer to the SPIL Instructions for more information about completing this section.

The SILC was established by Executive Order of the governor. The SILC is not established as an entity within any State agency, including the DSU and is independent of the DSU and all other state agencies. The following is a brief description of the legal status and placement of the SILC:

The SILC is a free-standing body whose members are appointed by the governor. Although it has autonomy and is self-governing, it does not have legal status independent of the DSU and receives some administrative support from the DSU.

The SILC is not required to report to any entity in state government and makes reports to RSA to meet federal requirements.

The SILC elects the SILC chairperson and other officers. The Executive Committee of the SILC is responsible for implementing the intentions of the SILC which are expressed through actions taken during the regular meetings of the SILC. The Executive Committee shall have the authority of the SILC in the management of the business of the SILC between meetings of the SILC, subject to the policies established by the SILC.

## 5.3 Appointment and Composition

Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b). Refer to the SPIL Instructions for more information about completing this section.

When a vacancy occurs, the Nominations Committee recruits potential members to the SILC. The Nominations Committee makes recommendations to the SILC to fill upcoming or existing vacancies on the SILC based on a review of SILC applications that focuses on federal requirements for SILC membership.

The SILC approves a list of candidates for appointment to the SILC.

The SILC approved list of candidates is forwarded to the Governor's office with a request to fill upcoming or existing vacancies on the SILC.

At all times, the Governor has open applications for all state councils and boards on the Montana website. Governor's Board and Councils: <https://app.mt.gov/cgi-bin/governor/appointment.cgi>  
The Governor may receive applications outside of the SILC review process through this source or other activities of his/her choosing. However, his staff members are kept aware of the requirements for serving on the SILC and requirements related to maintaining a majority of members who have a disability who are not employed by a CIL or state agency and other membership requirements.

The Governor selects candidates to fill upcoming or existing vacancies and the Governor's office sends out appointment letters.

The SILC chair is elected by the voting membership of the SILC in even numbered years. The chair must be a voting member of the SILC.

Term limits are maintained by keeping records of when a member is appointed to the SILC and the date of the end of their term and which term they are in (1st or 2nd). This information is distributed to all SILC members and is maintained in their SILC manual.

#### 5.4 Staffing

Describe how the following SILC staffing requirements will be met.

- SILC supervision and evaluation, consistent with State law, of its staff and other personnel as may be necessary to carry out its functions.

The SILC does not have staff. The SILC utilizes DSU staff that is assigned to assist the SILC. The SILC is involved with the evaluation, hiring and supervision of the DSU program manager who is the primary staff person assigned to assist the SILC. The chairperson of the SILC is consulted in developing the evaluation of the DSU program manager and will note if there are deficiencies in the program manager's performance with regard to responsibilities related to the SPIL and other duties as assigned by the SILC. The current DSU supervisor of the IL program manager is the staff person for the Vocational Rehabilitation Council and sometimes sits in on the SILC meetings and other SILC related activities. Therefore, the supervisor will also be monitoring the program manager's activities in this regard.

- Non-assignment of duties to SILC staff and other personnel made available by the DSU, or any other State agency or office, that would create a conflict of interest while assisting the SILC in carrying out its duties.

According to the SILC bylaws, no duties are assigned to the DSU personnel made available by the DSU or any other State agency or office that would create a conflict of interest while assisting the SILC in carrying out its duties.

## **Part II: Narrative: Section 6 - Service Provider Requirements**

Describe how the following service provider requirements will be met:

### 6.1 Staffing

- Inclusion of personnel who are specialists in the development and provision of IL services and in the development and support of centers.

Requirements to meet the above criteria are included in the contracts for IL services. CILs include personnel who are qualified to provide services to persons experiencing a significant disability. The CILs also have a board of directors who are knowledgeable about the development and fundraising activities for the centers.

This requirement is also in accordance with Montana's three year State Plan for Independent Living (particularly Part II Sections 2.1C, 2.2 B, 6.1,6.2,6.3,6.4,6.5, 6.6 and 6.7 and Title VII Section 725, Standards and Assurances for Centers for Independent Living, of the Rehabilitation Act, as amended; Centers must abide by the rules and bylaws of the Center; and maintain IRS certification under Section 501 (c) 3 of the Internal Revenue Code. The IL specialists within the CILs are qualified to provide IL services and have opportunities to improve their knowledge of IL philosophy and skills. During the site visit, the IL program manager (DSU) determines that the IL provider has established and is maintaining a program staff development for all positions, providing IL services and follow affirmative action laws, including employment of qualified individuals with disabilities under Section 503 of the Act. Also, during the site visit, the IL program manager (DSU) interviews personnel (IL staff, board of directors, peers and consumers) to assess their knowledge of IL services and development and support of centers. Consumers and peers are asked about their satisfaction and comments regarding the centers IL services and peer services and activities. Their feedback is included in the centers review report.

- Availability, to the maximum extent feasible, of personnel able to communicate (1) with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille, or audio tapes and (2) 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.

Requirements to meet the above criteria are included in the contracts for IL services. CILs provide services to persons experiencing a significant disability and need alternative modes of communication and/or personnel who speak the consumer's native language. This requirement is in accordance with Montana's three year State Plan for Independent Living (particularly Part II Sections 2.1 C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6, and 6.7) and Title VII Section 725, Standards and Assurances for Centers for Independent Living of the Rehabilitation Act, as amended: Abide by the rules and bylaws of the Center: and maintain IRS certification under Section 501 (c) 3 of the Internal Revenue Code. The IL specialist within the CILs are qualified to provide IL services and



have opportunities to improve their knowledge of IL philosophy and skills. During the site visit, the IL program manager (DSU) determines that the IL provider has established a program that is accessible to individuals with significant disabilities who rely on different modes of communication. The IL program manager requests a copy of materials in braille, audio tapes and electronic formatted materials. The CIL executive director is asked to describe other equipment that is used by staff to communicate with people who have significant disabilities. Also they describe any processes that are used to communicate in native languages of individuals with significant disabilities. During a site visit, the IL program manager (DSU) assesses that availability of personnel to communicate and the compliance by the service providers, which is monitored by reviewing the annual reports of the contractors.

One of the CILs employs a full-time sign language interpreter and a staff person who is fluent in Spanish. These staff are available to communicate with individuals who need their services.

- Establishment and maintenance of a program of staff development for all classes of positions involved in providing IL services and, where appropriate, in administering the CIL program, improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

Requirements to meet the above criteria, as required in 34 CFR 364.24, are included in the contracts for IL services. "Provide services to persons experiencing a significant disability." The establishment and maintenance of a program of staff development for all classes of positions providing IL services are required. This requirement is in accordance with Montana's three-year State Plan for Independent Living (particularly Part II Sections 2.1C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6, and 6.7) and Title VII Section 725, Standards and Assurances for Centers for Independent Living, of the Rehabilitation Act, as amended: Abide by the rules and bylaws of the Center; and maintain IRS certification under Section 501 (c) 3 of the Internal Revenue Code. The IL specialist within the CILs are qualified to provide IL services and have opportunities to improve their knowledge of IL philosophy and skills. During the site visit, the IL manager (DSU) determines that the IL provider has established and is maintaining a program staff development for all positions providing IL services, follow affirmative action laws, including employment of qualified individuals with disabilities under section 503 of the Act. During the site visit, the IL program manager will review the center's personnel and procedrues policy, employee handbook, staff training plans, board of directors training plans for staffing development. The IL program mangager will also interview staff and board of directors to assess whether their training and development for their position are met.

If needed, reccomendations are made to enhance their training by using the exisitng training and technical assistance provided, such as, ILRU, IL-NET and APRIL. Also, the CIL staff could use online courses on topics such as: WIPA and PASS classes, and trainer classes for Living/Working Well with a Disability, IL philosophy and history and classes in fundraising and resource development. Also, the board of directors may consider an on going training plan for their roles and responsibility. Compliance by the service providers is also monitored by reviewing the annual reports of the contractors.

- 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.

Requirements to meet the above criteria are included in the contracts for IL services. “Provide services to persons experiencing a significant disability.” The provider is required to follow affirmative action policies and practices to employ and advance in employment qualified individuals with disabilities under section 503 of the Act. This requirement is also in accordance with Montana’s three-year State Plan for Independent Living (particularly Part II Sections 2.1 C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6, and 6.7) and Title VII Section 725, Standards and Assurances for Centers for Independent Living, of the Rehabilitation Act, as amended: Abide by the rules and bylaws of the Center; and maintain IRS certification under Section 501 (c) 3 of the Internal Revenue Code. The staff within the CILs are qualified to provide IL services and have opportunities to improve their knowledge of IL philosophy and skills. During the site visit, the IL program manager (DSU) determines that the IL provider has established and is maintaining an affirmative action plan to employ and advance qualified individuals with significant disabilities for all positions providing IL services, follow affirmative action laws, including employment of qualified individuals with disabilities under section 503 of the Act. During the site visit, the IL program manager (DSU) assesses the use of affirmative action to employ and advance qualifying individuals with disabilities by reviewing the centers’ personnel and procedures policy, job descriptions, and interviews with the center’s staff.

## 6.2 Fiscal Control and Fund Accounting

- Adoption of those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for funds made available through parts B and C of chapter 1 of title VII of the Act, in addition to complying with applicable EDGAR fiscal and accounting requirements.

Requirements to meet the above criteria are included in the contracts for IL services. “The Contractor, in accordance with 18-4-311, MCA and other authorities, must maintain for the purposes of this contract an accounting system of procedures and practices that conforms to Generally Accepted Accounting Principles (GAAP), as interpreted by the Department, and to any other accounting requirements the Department may require.”

“The Department or any other legally authorized governmental entity or their authorized agents may at any time during or after the term of this contract conduct, in accordance with 5-13-304 and 18-1-118, MCA and other authorities, audits for the purposes of assuring the appropriate administration and expenditure of the monies provided to the Contractor through this contract and assuring the appropriate administration and delivery of services provided through this contract.”

“The Contractor, for purpose of audit and other administrative activities, in accordance with 18-1-118, MCA and other authorities, must provide the Department and any other legally authorized governmental entity or their authorized agents access at any time to all the Contractor’s records, materials and information, including any and all audit reports with supporting materials and work

documents, pertinent to the services provided under this contract until the expiration of three(3) years from the completion date of this contract.”

“The State and any other legally authorized governmental entity or their authorized agents may record any information and make copies of any materials necessary for the conduct of an audit or other necessary administrative activity.”

“The Contractor must reimburse the Department or compensate the Department in any other manner as the Department may direct for any sums of monies determined by an audit to be owing to the Department.”

Compliance by the service providers is monitored by reviewing the annual reports of the contractors and reviews of agreed upon procedures described earlier in the plan.

### 6.3 Recordkeeping, Access and Reporting

- Maintenance of records that fully disclose and document the information listed in 34 CFR 364.35.

Requirements to meet the above criteria in the contracts for IL services. Each contract for IL services contains a specific number of eligible CSRs that the contractor has documented for a program of IL service provisions. The IL providers are required to meet the requirements for record keeping, access and reporting, 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37. These providers are federally funded CILs and are required to meet standards for record keeping, access and reporting established by RSA and included in the CILs policies and procedures. Compliance by the service providers is monitored by reviewing the annual reports of the contractors, site visits, described earlier, in this plan, and monitoring responses to requests for access by the Commissioner and the Comptroller General, or any of their duly authorized representatives for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

- Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate

Requirements to meet the above criteria in the contracts for IL services. “ Each contract for IL services contains a specific number of eligible determined CSRs that document a program of IL service provisions. The IL providers are required to meet the requirements for record keeping, access and reporting, 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37. These providers are federally funded CILs and are required to meet standards for record keeping, access and reporting established by RSA and included in the CILs policies and procedures.”

Compliance by the service providers is monitored by reviewing the annual reports of the contractors site visits described earlier by the Commissioner and the Comptroller General, or any of their duly authorized representatives for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

- Access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

Requirements to meet the above criteria in the contracts for IL services. “ Each contract for IL services contains a specific number of eligible determined CSRs that document a program of IL service provisions. The IL providers are required to meet the requirements for record keeping, access and reporting, 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37. These providers are federally funded CILs and are required to meet standards for record keeping, access and reporting established by RSA and included in the CILs policies and procedures.”

Compliance by the service providers is monitored by reviewing the annual reports of the contractors, site visits, described earlier, in this plan, and monitoring responses to requests for access by the Commissioner and the Comptroller General, or any of their duly authorized representatives for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

#### 6.4 Eligibility

- Eligibility of any individual with a significant disability, as defined in 34 CFR 364.4(b), for IL services under the SILS and CIL programs.

Requirements to meet the above criteria are included in the contracts for IL services. Contract language requires the following:

\* "Provide services to persons with significant disabilities as determined in accordance with the IL Program Operating Plan who live in the under-served areas of specific counties."

\* "Provide the four core services of information and referral, IL skills training, individual and systems advocacy, and peer counselor and peer advocacy services as priority services under this contract. All consumers shall be given the opportunity to develop a mutually agreed upon program of services, either written or waived, to facilitate the development and achievement of independent living goals."

\*\*"Provide services to persons experiencing a significant disability: in accordance with Montana's three year SPIL (particularly Part II Sections 2.1 C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6,and 6.7) and Title VII Section 725, Standards and Assurance for Centers for IL, of Rehabilitation Act, as amended; Abide by the rules and bylaws of the Center; and maintain IRS certification under Section 501(c)3 of the Internal Revenue Code."

\*\*"Maintain State General Fund caseload carryover as detailed on the year-end 704 Report applicable for the month of June by continuing with and completing services detailed in the consumer's service record (CSR).

\*\*" Provide for (a specific number according to the IL service provider) new eligibility determinations with CSRs documenting a program of IL services provision.

\*" Compliance by the service providers is monitored by reviewing the annual reports of the contracts and eliciting information from specific questions regarding eligibility requirements as defined by 34 CFR 364.40; 34CFR 364.41 during site visits by the IL program manager (DSU)

- Ability of any individual to seek information about IL services under these programs and to request referral to other services and programs for individuals with significant disabilities.

Requirements to meet the above criteria are included in the contracts for IL services. Compliance by the service providers are monitored by reviewing the quarterly and annual reports of the contractors and site visits described earlier in this plan. Contract language requires the following:

\*"Provide services to persons with significant disabilities as determined in accordance with the IL Program Operating Plan who live in the under-served areas of specific counties."

\* "Provide the four core services of information and referral, IL skills training, individual and systems advocacy, and peer counselor and peer advocacy services as priority services under this contract. All consumers shall be given the opportunity to develop a mutually agreed upon program of services, either written or waived, to facilitate the development and achievement of independent living goals."

\*"Provide services to persons experiencing a significant disability: in accordance with Montana's three year SPIL (particularly Part II Sections 2.1 C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6,and 6.7) and Title VII Section 725, Standards and Assurance for Centers for IL, of Rehabilitation Act, as amended; Abide by the rules and bylaws of the Center; and maintain IRS certification under Section 501(c)3 of the Internal Revenue Code."

\*"Maintain State General Fund caseload carryover as detailed on the year-end 704 Report applicable for the month of June by continuing with and completing services detailed in the consumer's service record (CSR).

\*" Provide for (a specific number according to the IL service provider) new eligibility determinations with CSRs documenting a program of IL services provision.

\*" Compliance by the service providers is monitored by reviewing the annual reports of the contracts and eliciting information from specific questions regarding eligibility requirements as defined by 34 CFR 364.40; 34CFR 364.41 during site visits by the IL program manager (DSU)

- Determination of an individual's eligibility for IL services under the SILS and CIL programs in a manner that meets the requirements of 34 CFR 364.51.

Requirements to meet the above criteria are included in the contracts for IL services. Contract language requires the following:

\* "Provide services to persons with significant disabilities as determined in accordance with the IL Program Operating Plan who live in the under-served areas of specific counties."

\* "Provide the four core services of information and referral, IL skills training, individual and systems advocacy, and peer counselor and peer advocacy services as priority services under this contract. All consumers shall be given the opportunity to develop a mutually agreed upon program of services, either written or waived, to facilitate the development and achievement of independent living goals."

\*"Provide services to persons experiencing a significant disability: in accordance with Montana's three year SPIL (particularly Part II Sections 2.1 C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6,and 6.7) and Title VII Section 725, Standards and Assurance for Centers for IL, of Rehabilitation Act, as amended; Abide by the rules and bylaws of the Center; and maintain IRS certification under Section 501(c)3 of the Internal Revenue Code."

\*"Maintain State General Fund caseload carryover as detailed on the year-end 704 Report applicable for the month of June by continuing with and completing services detailed in the consumer's service record (CSR).

\*" Provide for (a specific number according to the IL service provider) new eligibility determinations with CSRs documenting a program of IL services provision.

\*" Compliance by the service providers is monitored by reviewing the annual reports of the contracts and eliciting information from specific questions regarding eligibility requirements as defined by 34 CFR 364.40; 34CFR 364.41 during site visits by the IL program manager (DSU)

- Application of 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.

Requirements to meet the above criteria are included in the contracts for IL services. Contract language requires the following:

\* "Provide services to persons with significant disabilities as determined in accordance with the IL Program Operating Plan who live in the under-served areas of specific counties."

\* "Provide the four core services of information and referral, IL skills training, individual and systems advocacy, and peer counselor and peer advocacy services as priority services under this contract. All consumers shall be given the opportunity to develop a mutually agreed upon program of services, either written or waived, to facilitate the development and achievement of independent living goals."

\* "Provide services to persons experiencing a significant disability: in accordance with Montana's three year SPIL (particularly Part II Sections 2.1 C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6,and 6.7) and Title VII Section 725, Standards and Assurance for Centers for IL, of Rehabilitation Act, as amended; Abide by the rules and bylaws of the Center; and maintain IRS certification under Section 501(c)3 of the Internal Revenue Code."

\* "Maintain State General Fund caseload carryover as detailed on the year-end 704 Report applicable for the month of June by continuing with and completing services detailed in the consumer's service record (CSR).

\*" Provide for (a specific number according to the IL service provider) new eligibility determinations with CSRs documenting a program of IL services provision.

\*" Compliance by the service providers is monitored by reviewing the annual reports of the contracts and eliciting information from specific questions regarding eligibility requirements as defined by 34 CFR 364.40; 34CFR 364.41 during site visits by the IL program manager (DSU)

- Non-exclusion from receiving IL services of any individual who is present in the State and who is otherwise eligible for IL services, based on the imposition of any State or local residence requirement.

Requirements to meet the above criteria are included in the contracts for IL services. Contract language requires the following:

\* "Provide services to persons with significant disabilities as determined in accordance with the IL Program Operating Plan who live in the under-served areas of specific counties."

\* "Provide the four core services of information and referral, IL skills training, individual and systems advocacy, and peer counselor and peer advocacy services as priority services under this contract. All consumers shall be given the opportunity to develop a mutually agreed upon program of services, either written or waived, to facilitate the development and achievement of independent living goals."

\* "Provide services to persons experiencing a significant disability: in accordance with Montana's three year SPIL (particularly Part II Sections 2.1 C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6,and 6.7) and Title VII Section 725, Standards and Assurance for Centers for IL, of Rehabilitation Act, as amended; Abide by the rules and bylaws of the Center; and maintain IRS certification under Section 501(c)3 of the Internal Revenue Code."

\*"Maintain State General Fund caseload carryover as detailed on the year-end 704 Report applicable for the month of June by continuing with and completing services detailed in the consumer's service record (CSR).

\*" Provide for (a specific number according to the IL service provider) new eligibility determinations with CSRs documenting a program of IL services provision.

\*" Compliance by the service providers is monitored by reviewing the annual reports of the contracts and eliciting information from specific questions regarding eligibility requirements as defined by 34 CFR 364.40; 34CFR 364.41 during site visits by the IL program manager (DSU)

## 6.5 Independent Living Plans

- Provision of IL services in accordance with an IL plan complying with Sec. 364.52 and mutually agreed upon by the individuals with significant disabilities and the appropriate service provider staff unless the individual signs a waiver stating that an IL plan is unnecessary.

Requirements to meet the above criteria are included in the contract for IL services. Contract language requires the following:

\* " Provide services to persons experiencing a significant disability: In accordance with Montana's three-year State Plan for Independent Living (particularly Part II Sections 2.1 C, 2.2 B, 6.1,6.2,6.3,6.4,6.5,6.6, and 6.7) and Title VII Section 725, Standards and Assurances for Centers for Independent Living, of the Rehabilitation Act, as amended.

\*"Provide the four core services of information and referral, IL skills training, individual and systems advocacy, and peer counselor and peer advocacy services as priority services under this contract. All consumers shall be given the opportunity to develop a mutually agreed upon program of services, either written or waived, to facilitate the development and achievement of IL goals."

\* "The consumers are informed of their rights to develop an ILP or waive the development of the plan when meeting with the CIL provider staff person. During the IL provider site visit, the IL program manager (DSU) reviews some of the CSRs for inclusion of a signed ILP or waiver.

\*" Compliance by the service providers is monitored by reviewing the annual reports of the contractors."

#### 6.6 Client Assistance Program (CAP) Information

- Use of accessible formats to notify individuals seeking or receiving IL services under chapter 1 of title VII about the availability of the CAP program, the purposes of the services provided under the CAP, and how to contact the CAP.

The consumers are informed in accessible formats of their rights under the Client Assistance Program and how to contact CAP during their meeting with the CIL provider staff person. During the IL provider site visit, the IL program manager (DSU) reviews some of the CSRs for accessible formats. In addition, the DSU disseminates a survey to assess the IL Customer's satisfaction and statewide IL needs which contains the question, "When you requested services, were you notified of your consumer rights and appeals process, including the Client Assistance Program (CAP)- assistance with complaints?"

#### 6.7 Protection, Use and Release of Personal Information

- Adoption and implementation of policies and procedures meeting the requirements of 34 CFR 364.56(a), to safeguard the confidentiality of all personal information, including photographs and lists of names.



HIPAA requirements are included in the contracts for IL services a section of the contract titled: " Confidentiality of Personal Information and Compliance with the Federal HIPAA and HITECH Privacy and Security Requirements." This section addresses several areas of confidential personal information including definitions, security, notice by contractor of unauthorized disclosures or uses, notice of investigations, comments, litigation, contractor compliance with the regulations governing the use and possession of personal healthcare information. Compliance by the service providers is monitored by reviewing the annual reports of the contracts. During the IL provider site visit, the IL program manager (DSU) reviews some of the CSRs for inclusion of HIPAA and other release of information forms signed by consumers.

## Part II: Narrative: Section 7 - Evaluation

Describe the method that will be used to periodically evaluate the effectiveness of the plan in meeting the objectives established in Section 1. The description must include the State's evaluation of satisfaction by individuals with significant disabilities who have participated in the program.

### Section 7: Evaluation

Goal(s) and the related Objective(s) from Section 1	Method that will be used to evaluate
Consumer Services	<p>Within one month of the initiation of the plan, an evaluation chart will be drafted that indicates milestones related to responsibilities in the SPIL, including reoccurring responsibilities; the time line will also include responsibility parties for various activities of the SPIL. The SPIL Evaluation Committee will review the evaluation chart at least twice a year to monitor progress of the SPIL activities. Should there be a need for a plan to address areas where activities are not meeting the expectations of the SPIL, a strategy will be developed by the committee to address the issues and forwarded to the Executive Committee for approval and implementation.</p> <p>Yearly self-evaluation by the CILs to meet the expectations of the 704 reporting system. Quarterly Part B and GF reports are prepared by the CILs and reviewed by the SILC and program manager from the DSU. The reports contain consumer service information as well as progress on certain SPIL objectives and contract compliance requirements. Every other year on-site reviews for the overall monitoring and evaluation of Part B and state general funds are conducted by the SILC and IL program manager from the DSU.</p>
Systems Change	<p>The quarterly Part B and GF reports are prepared by the CILs and reviewed by the IL program manager from the DSU. The reports contain systems advocacy activities that will describe the progress of the transition activities, including the MFP program and CFCO activities. These activities will include the following: The transition of 40 people from nursing homes and other institution into the community each year; Medicaid Personal Assistance Program based on a person centered plan for the CFCO; accessible and affordable housing available for individuals transitioning through the MFP program each year and new funding sources are identified each year to increase available and accessible transportation options for local and tribal transportation providers.</p> <p>A dialogue among identified stakeholders focusing on other employment options besides sheltered workshop models, will be completed.</p>
Outreach to Underserved Populations	<p>Public hearing procedures with emphasis placed on consumer input. Satisfaction surveys of CIL consumers distributed and tabulated annually. Results will be provided to the CILs and SILC to be used to assist IL programs</p>

	<p>to improve, change or support center activities.</p> <p>The first year of the SPIL, representatives from one of the underserved and from a specific disability population present during a SILC meeting. Outreach activities to underserved populations are written by CIL Directors and their quarterly reports each year.</p> <p>Once a year the IL program manager will evaluate the efforts of the IL services and outreach activities to the underserved populations and report to the SILC.</p> <p>CIL consumers and potential employers will receive information and referral employment resources. State department employees will provide job shadowing opportunities during Disability Mentoring Day.</p>
<p>Affect Public Policy through Education, Training and Awareness</p>	<p>Candidates are educated on IL issues and the IL community awareness of the candidates positions on IL issues are known before the 2014 general election.</p> <p>Strategies are advanced with local, state and national policy makers to increase opportunities for people with disabilities to participate more in the community of their choice.</p>
<p>SILC Member Involvement</p>	<p>SILC members are involved with five disability issues or activities each year. They will report progress of the activity they are involved in during one quarterly SILC or another disability organization meeting. As an organization representative, the SILC members will identify strategies to address and methods to resolve issues in their communities and report during a SILC meeting. During the first year of the plan, a SILC schedule of training will be developed. Best practices will be utilized to improve IL services and community resources in Montana.</p> <p>The SILC will provide an educational program on IL issues through a marketing/public relations strategy to educate the public on issues faced by the disability community.</p>

## **Part II: Narrative: Section 8 - State-Imposed Requirements**

### 8 State-Imposed Requirements

Identify any State-imposed requirements contained in the provisions of this SPIL.

In order to utilize the state accounting systems for fiscal transactions the SILC agrees to follow state rates for lodging, mileage, and meals. Grant funds coming into the state must be appropriated through the legislature under the following guidelines: " MT Constitution, Article 5, Section 11, Subsections 4 and 5. (4) A general appropriation bill shall contain only appropriations for the ordinary expenses of the legislative, executive, and judicial branches, for interest on the public debt, and for public schools. Every other appropriation shall be made by separate bill, containing but one subject. (5) No appropriation shall be made for religious, charitable, industrial, educational, or benevolent purposes to any private individual, private association, or private corporation not under control of the state. Also, monitoring of compliance related to fiscal issues is necessary to ensure compliance of contracts related to the SPIL. The state charges indirect costs to the Part B grant and any other funds awarded to the DSU to support the IL program."