SPIL Revision Instrument - FINAL

State: _MONTANA_____

STATE PLAN FOR INDEPENDENT LIVING (SPIL)

Chapter 1, Title VII of the Rehabilitation Act of 1973, as Amended

STATE INDEPENDENT LIVING SERVICES (SILS) PROGRAM
PART B

CENTERS FOR INDEPENDENT LIVING (CIL) PROGRAM
PART C

FISCAL YEARS _____2011-2013_____

Effective Date: October 1, _2010_____

PART I: Assurances

State of: _____MONTANA_____

Section 1: Legal Basis and Certifications

1.1 The designated State unit (DSU) eligible to submit the State Plan for Independent Living (SPIL or the plan) and authorized under State law to perform the functions of the State under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs is __The Montana Department of Public Health and Human Services – Disability Employment Independence and Transitions Program (insert name of DSU). *34 CFR 76.104(a)(1) and (2); 34 CFR 364.22(a)*

1.2 The separate State agency eligible to submit the plan and authorized under State law to provide vocational rehabilitation (VR) services to individuals who are blind is Disability Employment Independence and Transitions Program (insert name of separate State agency). Indicate N/A if not applicable. *34 CFR 76.104(a)(1) and (2); 34 CFR 364.20(d) and 364.22(c)*

1.3 The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State is Montana Statewide Independent Living Council (insert name of SILC). *34 CFR 364.21(a)*

1.4 The DSU and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the SPIL. *34 CFR 76.104(a)(7); 34 CFR 364.20(c) and (d)*

1.5 The DSU, and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, may legally carry out each provision of the plan and will comply with all applicable Federal statutes and regulations in effect with respect to the three-year period it receives funding under the SPIL. *34 CFR 76.104; 34 CFR 80.11(c)*

1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law. *34 CFR 76.104(a)(4) and (8)*

1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is Jim Marks, Administrator of Disability Employment Independence and Transitions Program (Name, title of DSU director) and Jim Marks, Administrator of Disability Employment Independence and Transitions Program (Name, title of separate State agency director, if applicable). *34 CFR 76.104(a)(5) and (6)*

Section 2: SPIL Development

2.1 The plan shall be reviewed and revised not less than once every three years, to ensure the existence of appropriate planning, financial support and coordination, and other assistance to appropriately address, on a statewide and comprehensive basis, the needs in the State for:

- The provision of State independent living services;
- The development and support of a statewide network of centers for independent living; and
- Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities. *34 CFR 364.20(f)*

2.2 The DSU and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan. *34 CFR 364.20(g)(1)*

2.3 The DSU and SILC establish and maintain a written description of procedures for conducting public meetings in accordance with the following requirements. The DSU and SILC shall provide:

- appropriate and sufficient notice of the public meetings (that is, at least 30 days prior to the public meeting through various media available to the general public, such as newspapers and public service announcements, and through specific contacts with appropriate constituency groups and organizations identified by the DSU and SILC);
- reasonable accommodation to individuals with disabilities who rely on alternative modes of communication in the conduct of the public meetings, including providing sign language interpreters and audio-loops; and
- public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication. *34 CFR 364.20(g)(2)*

2.4 At the public meetings to develop the State plan, the DSU and SILC identify those provisions in the SPIL that are State-imposed requirements beyond what would be required to comply with the regulations in 34 CFR parts 364, 365, 366, and 367. *34 CFR 364.20(h*)

2.5 The DSU will seek to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under a project funded under chapter 2 of title VII of the Act and that the DSU determines to be effective. *34 CFR 364.28*

2.6 The DSU and SILC actively consult, as appropriate, in the development of the State plan with the director of the Client Assistance Program (CAP) authorized under section 112 of the Act. *34 CFR 364.20(e)*

Section 3: Independent Living Services

3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other funds. *34 CFR 364.43(b)*

3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary. *34 CFR 364.43(c)*

3.3 All service providers will use formats that are accessible to notify individuals seeking or receiving IL services under chapter 1 of title VII about:

- the availability of the CAP authorized by section 112 of the Act;
- the purposes of the services provided under the CAP; and
- how to contact the CAP. *34 CFR 364.30*

3.4 Participating service providers meet all applicable State licensure or certification requirements. *34 CFR 365.31(c)*

Section 4: Eligibility

4.1 Any individual with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and CIL programs authorized under chapter 1 of title VII of the Act. Any individual may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate. The determination of an individual's eligibility for IL services under the SILS and CIL programs meets the requirements of 34 CFR 364.51. *34 CFR 364.40(a), (b) and (c)*

4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services. *34 CFR 364.41(a)*

4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services. *34 CFR 364.41(b)*

Section 5: Staffing Requirements

5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. *34 CFR 364.23(a*)

5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:

- with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille or audio tapes, and who apply for or receive IL services under title VII of the Act; and
- in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act. *34 CFR 364.23(b)*

5.3 Service providers establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development programs emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy. *34 CFR 364.24*

5.4 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will take affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act. *34 CFR 364.31*

Section 6: Fiscal Control and Fund Accounting

6.1 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will comply with applicable EDGAR fiscal and accounting requirements and will adopt those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for those funds. *34 CFR 364.34*

Section 7: Recordkeeping, Access and Reporting

7.1 In addition to complying with applicable EDGAR recordkeeping requirements, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain records that fully disclose and document:

- the amount and disposition by the recipient of that financial assistance;
- The total cost of the project or undertaking in connection with which the financial assistance is given or used;
- the amount of that portion of the cost of the project or undertaking supplied by other sources;
- compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
- other information that the Commissioner determines to be appropriate to facilitate an effective audit. *34 CFR 364.35(a) and (b)*

7.2 With respect to the records that are required by 34 CFR 364.35, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate. *34 CFR 364.36*

7.3 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will provide access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, to the records listed in 34 CFR 364.37 for the purpose of conducting audits, examinations, and compliance reviews. *34 CFR 364.37*

Section 8: Protection, Use, and Release of Personal Information

8.1 Each service provider will adopt and implement policies and procedures to safeguard the confidentiality of all personal information, including photographs and lists of names in accordance with the requirements of 34 CFR 364.56(a)(1-6). *34 CFR 364.56(a)*

Section 9: Signatures

After having carefully reviewed all of the assurances in sections 1 - 8 of this SPIL, the undersigned hereby affirm that the State of __Montana___ is in compliance and will remain in compliance with the aforementioned assurances during ___2010-2013___ (specify the three-year period covered by this SPIL).

The effective date of this SPIL is October 1, ___2010_____ (year)

_____

SIGNATURE OF SILC CHAIRPERSON DATE

_____

NAME OF SILC CHAIRPERSON

_____

SIGNATURE OF DSU DIRECTOR DATE

__ Jim Marks, Administrator of Disability Employment Independence and Transitions Program

_____

NAME AND TITLE OF DSU DIRECTOR

_____

SIGNATURE OF DIRECTOR OF THE SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND DATE

__Jim Marks, Administrator of Disability Employment Independence and Transitions Program

_____

NAME AND TITLE OF THE DIRECTOR OF THE SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

State of: ____Montana_____

Part II: Narrative

Section 1: Goals, Objectives and Activities

1.1 Goals and Mission – 34 CFR 364.42(b)(1)

Describe the overall goals and mission of the State's IL programs and services. The SPIL must address the goals and mission of both the SILS and the CIL programs, including those of the State agency for individuals who are blind as they relate to the parts of the SPIL administered by that agency.

It is the intent of the Montana Statewide Independent Living Council (SILC) and the Department of Public Health and Human Services - Disability Employment Independence and Transitions Program 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 persons with disabilities into mainstream Montana.

The following are the goals of the SILS:

Goal one: To provide independent living (IL) services to as many people as possible in Montana.

This goal incorporates Summit's Consumer Services Priorities (Priority 3), NCIL'S Goal 5, MILP's Community Service and Outreach Goals (Priority 1), LIFTT's Goal 3 and incorporates the SILC's decision to use most of the Part B funds to contract with CILs in Montana.

Goal Two: To provide outreach to underserved populations in Montana to gain a better understanding of how to provide appropriate services to populations designated as underserved, which are youth with disabilities, Native Americans, and people with disabilities seeking employment .

This goal incorporates NCIL's goal 4, LIFTT's Goal 2 and Summit's Priority Areas for Outreach Efforts (Priority 1).

Goal three: To support a statewide network of CILs.

The following are the missions and goals of Montana's CILs:

The CIL goals that are mentioned as being incorporated into the SPIL are the CIL goals supported by the plan. The other goals are more local in nature and are supported by funds outside of this plan.

The mission of North Central Independent Living Services (NCILS) is:

This organization is established for the purpose of providing access to a more independent lifestyle for persons 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 include 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.

The following are NCILS' goals (modified from three year work-plan):

Goal 1: Provide advocacy skills training to educate consumer peer advocates and the public about disability issues.
Goal 2: Make available CIL resources to support public actions to increase community access.
Goal 3: Advance the Montana Symposium peer task forces activities.
Goal 4: Conduct outreach activities to increase the number of people served who are members of populations that are currently unserved or underserved.
Goal 5: Provide IL services to 100 new individuals with disabilities.

Montana Independent Living Project's (MILP) mission is to promote independence for people with disabilities.
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.
The following are MILP's goals (modified from the 2008-2011 three year plan):
Consumer Services and Outreach Goals:

Priority 1: Continue providing core services to consumers.
Priority 2: Outreach to Montana State University (MSU) Bozeman's disability service components and students with disabilities to increase understanding of IL and its philosophy model and self-determination practices.
Priority 3: Augment information and referral services to Social Security eligible individuals.
Priority 4: Increase access to health care and technology through community capacity building involving Montana blind and low vision citizens.

Advocacy/Systems Change Goals:

Priority 1: Develop cooperative relationship between Montana ADRC and MILP to establish a "no wrong door" approach to service delivery.
Priority 2: Maintain MILP's role as a disability resource for technical assistance, training and systems change/advocacy.
Priority 3: Increase health care promotion through community education/public information in health and recreation facilities.
Priority 4: Continue and maintain MILP's various transportation related partnerships and capacity option development.
Priority 5: Serve as a resource regarding accessible housing and livable communities.
Priority 6: Monitor and advocate state and national legislative and policy issues.

Resource Development Goals:

Priority 1: Increase outreach in MILP's service area via additional resources and professional services.

Priority 2: Enhance peer advocacy program to involve additional consumers in peer support activities and mentoring across MILP's service area.
Priority 3: Research, investigate and develop technology options which increase MILP's efficiency and cost-effective operations.
Priority 4: Maintain competitive staff wages, salaries, and benefits for comparable jobs in state government and the private sector.
Priority 5: Continue to provide suitable staff and board member training consistent with long-term strategic planning.

Summit Independent Living Center'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.
The following are Summit's priorities (modified from 2010 three year work-plan):
Consumer Services Priorities
Priority 1: Enhance peer mentoring program to include broader notion of peer support (beyond one-on-one matches) and involve more consumers in peer support activities.

Priority 2: Explore options for increasing consumer involvement in community activities to lessen loneliness and isolation; and continue independent living skills training classes and workshops.

Priority 3: Continue core and other IL services.

Priority 4: Build on nursing home and hospital transition services in Missoula established in conjunction with the Aging and Disability Resource Center (ADRC) program with Missoula Aging Services.

Priority 5: Provide health promotion services to people with disabilities in conjunction with activities of the Montana Disability and Health (MTDH) program at the Rural Institute on Disabilities.

Priority Areas for Advocacy Efforts

Priority 1: Advocate for expanded community based services and long-term care options.

Priority 2: Monitor and state and federal legislation and conduct legislative advocacy and educational activities to advance disability issues on the local, state and federal levels.

Priority 3: Continue to expand and support transportation options for people with disabilities in Summit's service area through ongoing involvement in local Transportation Advisory Committees (TACs).

Priority 4: Continue to advocate for improvement in the accessibility of at least 12 businesses, outdoor recreation sites, public facilities, and housing units in western Montana each year including promoting increased accessibility of health-related facilities and the concept of "visit-ability" in new housing construction.

Priority 5: Increase peer advocate involvement in Summit public education and community awareness efforts through school presentations, disability awareness training, fair booths, and other methods. Conduct a minimum of 40 such activities per year.

Priority 6: Collaborate with consumer groups in other communities and with the Statewide Independent Living Council (SILC) to coordinate local advocacy initiatives.

Priority Areas for Outreach Efforts
Priority 1: Summit will focus outreach efforts on Native Americans, youth with disabilities, people who are deaf, and rural areas in western Montana.

Priority Areas for Resource Development
Priority 1: Seek grants and other funding opportunities to improve Summit's programs and services, improve staff wages, upgrade technology; and explore purchasing a building for Summit's Missoula office when current lease expires in 2011.

Priority Areas for Training of Staff and Board Members
Priority 1: Continue to provide or arrange for periodic training opportunities for staff, peers, and board members through in service training, participation in workshops and training seminars, and attendance at relevant state and national conferences.

Living Independently for Today and Tomorrow's (LIFTT) mission is:
Living Independently for Today and Tomorrow is a Montana non-profit (501(c)(3)) organization committed to empowering persons with disabilities to live freely and equally in Montana through the provision of independent living services which reduce societal barriers.

The following are LIFTT's goals (modified from 2010 three year plan):
Goal 1: Engage in collaboration activities in order to support advocacy issues and services for persons with disabilities.

Goal 2: Provide community education and outreach to rural communities and to serve the unserved and underserved populations identified in LIFTT's 18 counties, which include but is not limited to, women, American Indians and youth.

Goal 3: Provide core service delivery and self-directed personal assistance services.

Goal 4: Promote IL philosophy throughout the service area.

Goal 5: Continue to develop sources of non-restricted revenue by conducting at least one fund raising activity per year and partnering with or submitting at least one grant request to demonstrate or enhance IL services and philosophy.

Goal 6: Conduct personnel and board of directors hiring and development activities.

Goal 7: Complete administrative activities.

Goal 8: Executive planning and evaluation functions

Goal four: To support involvement with other organizations that promote services or advocacy efforts related to the disability community.
This goal incorporates NCIL's goals 1, and 2; MILP's Advocacy/Systems Change Goals: Priority 1, 2, and 3; Summit's Consumer Services Priorities (Priority 4 and 5), Priority Areas for Advocacy Efforts (Priority 6); and LIFTT's goals 1 and 2.

Goal five: To coordinate independent living task forces to carry out legislative and systems advocacy efforts to address the statewide priority issues established at an October 2009 symposium held in Billings with 150 participants that included the directors and staff of all 4 Montana CILs, board members of some Montana CILs, SILC members, DSU staff and IL consumers. The independent living task forces established, and the priority statewide issues identified at the October 2009 symposium and reaffirmed at a second symposium held in Missoula in July 2010, are:

Health Care Task Force

- Equalize Medicaid Medically Needy spend down amount with SSI income limit
- Advocate for additional HCBS waiver slots, maintenance of provider rate increases, and adequate funding for personal assistance services and other long-term services and supports
- Promote the Montana Medicaid for Workers with Disabilities (Medicaid Buy In) program so people with disabilities statewide can maintain Medicaid benefits on the job

Youth with Disabilities Task Force

- Explore possibilities to establish self-directed IEPs for high school students with disabilities statewide
- Advocate that VR counselors consistently begin attending IEPs when high school students turn 16 to improve transition outcomes statewide

Funding Issues Task Force

- Maintain adequate funding for Montana Centers for Independent Living & SILC
- Maintain adequate funding for programs that support independent living needs of consumers

Self Determination Task Force

- Establish a mechanism to ensure "Nothing About Us Without Us" in state government
- Advocate better enforcement of building code standards for accessibility statewide
- Advocate that any changes to Montana election laws such as mail balloting provide for accessibility and voting privacy for citizens with disabilities
- Advocate for the re-establishment of a specialized clinic or other means to accurately diagnose and treat people who experience post polio syndrome

Housing Task Force

- Promote the concept of visitability in new housing construction statewide to increase the stock of housing that is usable for people with disabilities
- Advocate for increased numbers of subsidized housing vouchers available across the state to expand options for affordable and accessible housing
- Promote Fair Housing issues to minimize discrimination and expand housing opportunities for people with disabilities

Transportation Task Force

- Increase coordination and advocacy resources for Transportation Advisory Committees so they may strengthen linkages and resources in and between Montana's communities
- Advocate for increased funding and expanded transportation resources not only to maintain current level services, but to increase services to address unmet needs
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Montana American Indian and Disability Initiatives Task Force

- Develop a statewide resource list of resources, programs and services available for American Indians with disabilities, particularly those living on reservations
- Advocate for Social Security liaisons or other means to increase acceptance of Indian health clinic (Indian Health Service or Tribal Health Clinic) doctors' diagnoses of people's disabilities

Public Relations/Education Task Force

- Develop talking point documents to be used by all four CILs to consistently promote independent living philosophy, services and systems advocacy/social change efforts statewide
- Develop statewide media contact lists to support ongoing media advocacy efforts

1.2 <u>Objectives – 34 CFR 364.42(a)(1) and (d); 34 CFR 364.32; 34 CFR 364.33</u>

1.2A Specify the objectives to be achieved and the time frame for achieving them.
Because many of the CILs goals are incorporated into SILS goals, objectives are only detailed for the SILS goals.
Explanation of procedure for carrying out goals and objectives:

- CIL actions are based upon direction of the CIL director and when necessary will have been approved by the CIL governing board.
- SILC actions are guided by decisions and actions of either the full SILC or the Executive Committee. The SILC and the Executive Committee provide guidance to the SILC committees that do most of the plan development of SILC initiatives. SILC committees often include non-SILC members. As an example, all SILC committees have at least one CIL director on the committee and all CIL directors serve on at least one SILC committee. So, even though there is only one CIL director on the SILC, all CIL directors are actively involved in the planning process of SILC activities and goals. It should be noted that all four CIL directors sit on the Legislative/Advocacy Committee which is most active in the planning of the overarching goals of the SILC that impact changes to improve the lives of persons with disabilities across Montana.

- The program manager carries out activities as assigned by the SILC, the Executive Committee, or the other SILC committees. Activities most often assigned include:
    - Arranging meetings of full SILC, committees, and statewide meetings.
    - Research related to a variety of issues and potential resources
    - Draft development of a variety of documents required by activities of the SILC

Goal one: To provide independent living (IL) services to as many people as possible in Montana.

Objective 1: During each year of the plan, at least 233 new consumers will be found eligible and have services initiated by Montana's network of CILs through the Part B and MT General Fund contracts.

Objective 2: During each year of the plan, at least 50 activities involving local advocacy to improve the lives of persons with disabilities in areas such as housing, health promotion, transportation, accessibility, and youth transition will be carried out by Montana's network of CILs with SILC members being involved in at least 15 of the advocacy activities. Examples include: advocating for increasing the accessible units in local housing programs; recruiting and orienting persons with disabilities to serve on local transportation advisory committees; and developing, coordinating, and promoting a local care giver conference.

With regard to Objectives 1 and 2 of this goal, if the funds are available to the DSU to increase the funding in the CIL contracts, the number of new consumers served will be increased proportionately to the previous cost per consumer. A similar increase can be expected in systems change activities. Also, if the contract funding available decreases a similar decrease in new consumers served and systems change activities can be expected.

Objective 3: Each year of the plan, in order to monitor the provision of services, the DSU program manager will conduct a site visit to review case records, conduct interviews, and other activities necessary to assess the service delivery system of two CILs. As part of the evaluation of this goal, a SILC representative will accompany the program manager on the site visits. Within sixty days following the site visit, a written report will be developed and delivered to the CIL director, with a copy to be delivered to the CIL board. A report will be provided to the full SILC at the SILC meeting following the site visit.

Objective 4: Each year of the plan, the DSU will provide the administrative support necessary to compile the contracts to provide services through the CILs. As part of the evaluation of this goal, the Bylaws/Budget Committee of the SILC will review and provide input on the contracts.

Objective 5: During each year of the plan, the DSU program manager will consult with CIL directors and SILC members to gather information to draft a report for the Governor that will also be distributed to state legislators. The draft will be reviewed by the SILC chair and revised as necessary prior to final distribution.

Goal two: To provide outreach to underserved populations in Montana to gain a better understanding of how to provide appropriate services to populations designated as underserved.

Objective 1: Each year of the plan, each of the CILs under contract with the DSU will conduct at least one systems change activity (see explanation of systems change and examples in Goal One; Objective 2) that supports an independent living issue of importance to consumers from one of the designated underserved populations.

Objective 2: Each year of the plan, the SILC will invite representatives from one of the identified underserved populations to present at a SILC meeting to provide guidance on methods of adapting the four core services to better serve that population.

Objective 3: Each year of the plan, the CILs will continue to collaborate with the urban Indian centers and other agencies located in their service area regarding outreach to appropriate consumers served by the urban Indian centers and other agencies. The CIL directors will report on the outcomes of these collaborative efforts at a SILC meeting each year.

Objective 4: Before the end of the first year of this plan, the CIL directors will report to the SILC their plans for outreach to Native Americans who live off the reservations and outside of the communities where the urban Indian centers are located, and the results of outreach efforts.

Objective 5: Each year of the plan, the CILs will continue to collaborate with the Section 121 projects and other tribal programs on the reservations located in their service areas regarding outreach to appropriate consumers served by the 121 projects and other tribal programs. The CIL directors will report on the outcomes of these collaborative efforts at a SILC meeting each year.

Objective 6: Each year of the plan, at a SILC meeting, the CIL directors will present the initiatives they have carried out that year to outreach to the identified underserved populations groups and provide data and other evidence of the outcomes of those efforts.

Objective 7: Throughout the plan, the SILC will maintain a youth member (age 18-28) on the SILC. If the youth member ages out and continues on the SILC, another member meeting the age criteria will be recruited when a vacancy occurs.

Objective 8: Throughout the plan, the SILC will have an active Underserved Committee (including the Native American Task Force and Youth with Disabilities Task Force) that meets at least three times per year and provides guidance to the SILC on underserved populations, including evaluation of the efforts to outreach to the underserved populations.

Objective 9: Throughout the plan, there will be a director or representative of 121 projects on the SILC.

Objective 10: In order to meet the cross-disability responsibility of IL, the SILC will have one disability specific presentation at a SILC meeting each year of this plan to keep current with needs and initiatives of specific disabilities.

Objective 11: Each year of the plan, at a SILC meeting, the CIL directors will report on their efforts to promote the Montana Medicaid for Workers with Disabilities Program so people with disabilities statewide can maintain Medicaid benefits on the job.

Objective 12: Throughout the plan, the SILC will support the efforts of the CILs to maintain and expand the Work Incentives Planning and Assistance Program.

Objective 13: Each year of the plan the SILC will support training opportunities for youth with disabilities.

Objective 14: The CIL directors will report on the outcomes of their outreach activities to improve the lives of youth with disabilities at a SILC meeting each year.

Goal three: To support a statewide network of CILs.
Objective 1: At least every four years, an audit and other investigative reviews of financial procedures will be arranged by the DSU at each CIL to assist the CILs in developing effective financial procedures as stipulated in the Part B and General Fund contracts.

Objective 2: Each year of the plan, by January 1, the DSU will coordinate and report to the SILC on a consumer satisfaction survey of CIL consumers. A report on the analysis of the results will be presented to the SILC at the SILC meeting following the completion of the analysis. The report for each CIL will be presented to the director of the CIL within a week of completion of the report.

Goal four: To support involvement with other organizations that promote services or advocacy efforts related to the disability community**.**
Travel costs for this goal will be covered in the following manner:

- Travel for SILC members will be covered through the SILC resource plan budget.
- Travel for CIL employees will be covered by the employing CIL.
- Travel for the DSU program manager will be paid from the Other SPIL Activities budget that supports DSU SILS activities.

Also, in some cases, the hosting agency may pay the travel costs or other funds may be available.

Objective 1: Throughout the time period covered by this plan, maintain and support SILC or CIL representation (including reasonable expenses incurred for participation) with the following organizations that are involved with services and advocacy in the disability community, including, but not limited to:

- Montana Council on Developmental Disabilities
- Montana Association of the Blind
- Montana Association of the Deaf
- Disability Rights Montana
- Vocational Rehabilitation Council
- Others to be identified

Because many of the above organizations exert control over their membership, the commitment to be involved with the organizations does not apply if the organization chooses not to have a SILC or CIL representative.
Each year of the plan, representatives will provide a report on the activities of the organization during at least one meeting of the full SILC.

Objective 2: Each year of the plan, invite at least one presentation from appropriate groups that promote services or advocacy efforts. At least one presentation over the three year plan will be from an advocacy organization representing the elderly population.

Objective 3: Throughout the time period covered by the plan, maintain involvement on the national level with the following organizations:

- Association of Programs for Rural Independent Living (APRIL)
- National Council on Independent Living (NCIL)
- SILC Congress

Maintaining involvement will include sending a minimum of one representative (of the SILC, a CIL director or CIL staff member, or DSU program manager) to national meetings if funding allows and obtaining reports from those representatives at SILC meetings.

Objective 4: In order to increase communication with Montana's elderly population and the agencies that serve them, the following activities will be carried out:

- The Montana CILs will work cooperatively with the Area Agencies on Aging in their regions to establish a "No Wrong Door" approach in service delivery for access to long term care services for people with disabilities and seniors through Aging and Disability Resource Center partnerships (ADRCs) and other collaborative efforts.
- The Montana CILs will collaborate with the Long Term Care Choices Coalition spearheaded by AARP to advocate improved Medicaid long term services and supports for people with disabilities and seniors.

<u>Goal five: To coordinate independent living task forces to carry out legislative and systems advocacy efforts to address the statewide priority issues established at an October 2009 symposium held in Billings with 150 participants that included the directors and staff of all 4 Montana CILs, board members of some Montana CILs, SILC members, DSU staff and IL consumers. The independent living task forces established, and the priority statewide issues identified at the October 2009 symposium and reaffirmed at a second symposium held in Missoula in July 2010, are:</u>

Health Care Task Force

- Equalize Medicaid Medically Needy spend down amount with SSI income limit
- Advocate for additional HCBS waiver slots, maintenance of provider rate increases, and adequate funding for personal assistance services and other long-term services and supports
- Promote the Montana Medicaid for Workers with Disabilities (Medicaid Buy In) program so people with disabilities statewide can maintain Medicaid benefits on the job

Youth with Disabilities Task Force

- Explore possibilities to establish self-directed IEPs for high school students with disabilities statewide
- Advocate that VR counselors consistently begin attending IEPs when high school students turn 16 to improve transition outcomes statewide

Funding Issues Task Force

- Maintain adequate funding for Montana Centers for Independent Living & SILC
- Maintain adequate funding for programs that support independent living needs of consumers

Self Determination Task Force

- Establish a mechanism to ensure "Nothing About Us Without Us" in state government
- Advocate better enforcement of building code standards for accessibility statewide
- Advocate that any changes to Montana election laws such as mail balloting provide for accessibility and voting privacy for citizens with disabilities
- Advocate for the re-establishment of a specialized clinic or other means to accurately diagnose and treat people who experience post polio syndrome

Housing Task Force

- Promote the concept of visitability in new housing construction statewide to increase the stock of housing that is usable for people with disabilities
- Advocate for increased numbers of subsidized housing vouchers available across the state to expand options for affordable and accessible housing
- Promote Fair Housing issues to minimize discrimination and expand housing opportunities for people with disabilities

Transportation Task Force

- Increase coordination and advocacy resources for Transportation Advisory Committees so they may strengthen linkages and resources in and between Montana's communities
- Advocate for increased funding and expanded transportation resources not only to maintain current level services, but to increase services to address unmet needs

Montana American Indian and Disability Initiatives Task Force

- Develop a statewide resource list of resources, programs and services available for American Indians with disabilities, particularly those living on reservations
- Advocate for Social Security liaisons or other means to increase acceptance of Indian health clinic (Indian Health Service or Tribal Health Clinic) doctors' diagnoses of people's disabilities

Public Relations/Education Task Force

- Develop talking point documents to be used by all four CILs to consistently promote independent living philosophy, services and systems advocacy/social change efforts statewide
- Develop statewide media contact lists to support ongoing media advocacy efforts

Objective 1: The Legislative/Advocacy Committee will meet at least quarterly throughout the term of the SPIL to work with the task forces to measure progress on legislative and systems change priorities and assist with any changes to existing priorities or the establishment of new priorities.

Objective 2: By October 15, 2010, the task forces made up of consumers, CIL staff, and SILC members will have prioritized the above issues, and will have identified the following:

- The administration aspects of the issues, the possible legislative actions of the issues, and/or the general advocacy components.
- Potential need for additional funding, approximate amount of funding needed, and plan for determining the necessary funding level.
- At least five strong talking points supporting each issue.
- If the issue is too broad what are some bite size pieces that can be addressed.
- Who are some other possible champions that might assist with each issue?
- The overall priorities that can be accomplished given available time and resources.

Objective 3: By January 1, 2011, in collaboration with the Legislative/Advocacy Committee, the task forces will have identified the issues that require grassroots legislative advocacy and the strategies for addressing the priority legislative issues during the 2011 Montana legislative session.

Objective 4: By July 1, 2011, the task forces will have reviewed the impact of the recent Montana legislature on priority legislative issues and readjusted strategies on their goals based on the outcomes of the legislative session.

Objective 5: By September 30, 2011, the Legislative/Advocacy Committee will coordinate with the Montana Independent Living Project to host a statewide symposium in Helena to review progress on task force priorities for legislative and systems change initiatives, re-prioritize issues impacting the disability community, and identify the issues that require grassroots legislative advocacy during the 2013 Montana legislative session.

Objective 6: By January 1, 2012 the Legislative/Advocacy Committee will readjust the task forces to address the new priorities.

Objective 7: By January 1, 2013, in collaboration with the Legislative/Advocacy Committee, the task forces will have identified the issues that require grassroots legislative advocacy and the strategies for addressing the priority legislative issues during the 2013 Montana legislative session.

Objective 8: The task forces will each pursue at least 1 statewide systems advocacy or legislative priority each year during the three year term of the SPIL.

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

– **Identify the populations to be designated for targeted outreach efforts;**

The populations identified as underserved in Montana are Native Americans with disabilities, youth with disabilities, and persons with disabilities considering employment.

Montana has seven American Indian reservations and is in the process of establishing an eighth. Native Americans account for 6 percent of the state's population. Sixty percent of the state's Native American population resides on reservations. In past plans, the emphasis of the outreach efforts towards Native Americans has been meeting with Section 121 directors who manage programs on reservations. In this plan, there will be an additional initiative (Goal 2 Objective 3) to outreach to the urban Indian centers located in Montana in efforts to better reach the additional forty percent of Native Americans residing in Montana.

Youth (age 18-28) are recognized as an underserved population, 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 unique circumstances of transitioning from high school to the adult service system.

Efforts guided by past state plans have assisted in increasing the number of youth with disabilities and Native Americans with disabilities served by Montana's CILs. During the past few years, these populations were served at comparable percentages to those served in the general disability population. In this plan, it is hoped that the comparable service level can be maintained or improved upon and that CILs can be assisted in identifying modifications to service delivery that will make services more appropriate to the different perspectives of the identified underserved populations.

For several years Montana's disability community has indicated a number of issues have impeded persons with disabilities who are considering employment. Key issues noted in this area are obtaining information on social security work incentives, retaining medical coverage after employment, and transportation. The SILC and CILs plan to address these issues in the upcoming three years through direct services and systems advocacy.

– **Identify the geographic areas (i.e., communities) in which the targeted populations reside; and**

The language in the 2010-2013 SPIL references underserved <u>populations</u>, not geographical areas. The SPIL language was developed carefully after much discussion and planning with no contemplation for directing new funding by geography based on demographics alone, but rather by identifying populations statewide that were determined to be underserved in comparison with other individuals/groups in the state. This strategy has been consistent for many years and is based on developing the capacity of all four CILs to better meet the needs of all consumers, both those currently receiving services as well as those who are underserved.

The populations identified as underserved in the current SPIL are Native Americans, youth with disabilities, and persons with disabilities seeking employment. Montana is a very large, geographically diverse state with a total square mileage of 147,043 square miles. Each CIL's service area is unique with its own blend of very rural, sparsely populated areas along with regional population centers. Taken as a whole, the population density of the state is incredibly

sparse, with a total state population of 902,195 people for an average population density of 6.2 people per square mile. Compared with the service areas of CILs in most other states, each Montana CIL has a significant challenge serving the vast area in which its consumers are located particularly in light of the rural nature of most of the state with few local community resources available and scarce transportation options. The argument can reasonably be made that the entire state is underserved, especially in light of the fact that 145,732 Montanans indicated they had some type of mental or physical impairment in the 2000 Census, all of whom are potential consumers of the four CILs People statewide deserve the opportunity to benefit from independent living, so the strategy reflected in the SPIL is to develop the capacity of all four CILs equally to address the needs in their respective service areas, including the three populations identified as outreach priorities.

- **Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed.**
  This is described in several objectives in Goal 2, Objectives 3, 4, and 5 and 1.2B targeted outreach efforts.

- Native Americans -- Montana's Native American population resides both on seven reservations as well as in communities across the state.

  The distribution of Montana's Native American population reflects the location of the 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 all three 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; LIFTT serves the Northern Cheyenne Reservation through a branch office located in Ashland; and NCILS has a branch office on the Fort Peck Reservation in Poplar. Additional ARRA Part C funding distributed equally among the CILs reinforces the strategy for expansion of the network of CILs through branch offices, and will further develop the CILs' capacity to serve Native Americans across the state.

  In addition to the seven reservations, there are urban Indian centers located in Butte, Helena, Missoula, Great Falls, and Billings that provide services to Native Americans residing in or near these cities. Although MILP does not have a reservation within its service area, it does have two of the urban Indian centers (Butte & Helena) and a total Native American population of 4,219 (2008 estimate). It is generally understood that Native Americans experience disability at a rate of approximately 26%; thus, extrapolating the data would yield 1,097 Native Americans with disabilities within MILP's service area, a significant underserved population.

1.3 <u>Financial Plan – 34 CFR 364.42(a)(2) and (3); 34 CFR 364.29</u>

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.

The following are funding projections and may vary throughout the course of the plan. If funding changes of more than 5% of a particular funding source are anticipated, it may require modification of the SPIL. Changes of less than 5% of a particular funding source are not anticipated as requiring a modification in the SPIL unless goals and objectives are significantly impacted.

<u>Year 1</u>

Sources	**Approximate Funding Amounts and Uses**			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				
Chapter 1, Part B/match is listed under state funds	*$157,871	$206,890	0	$88,672
Chapter 1, Part C	0	0	*$872,468	0
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)	0	0	0	0
Other Federal Funds				
Sec. 101(a)(18) of the Act (Innovation and Expansion)	$8,830	0	0	0
Other (WIPA Grant)	0	$100,000	0	0

Other (SS reimbursement)		$20,000		
Non-Federal Funds				
State Funds - match	$3,608	$22,988	0	$9,853
State Funds – general funds for IL services	0	$336,593	0	0
Other	0	0	0	0

Year 2

Sources	**Approximate Funding Amounts and Uses**			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds				
Chapter 1, Part B	$10,958	$206,892	0	$89,428
Chapter 1, Part C	0	0	*$960,057	0
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)	0	0	0	0
Other Federal Funds				
Sec. 101(a)(18) of the Act (Innovation and Expansion)	$8,830	0	0	0
Other (WIPA Grant)	0	$100,000	0	0
Other (SS reimbursement)		$20,000		
Non-Federal Funds				
State Funds - match	$3,608	$22,987	0	$9,936
State Funds – general funds for IL services	0	$349,899	0	0
Other	0	0	0	0

Year 3

Sources	**Approximate Funding Amounts and Uses**			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities,
Title VII Funds				
Chapter 1, Part B	$10,958	$206,892	0	$90,184
Chapter 1, Part C	0	0	$784,879	0
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)	0	0	0	0
Other Federal Funds				
Sec. 101(a)(18) of the Act (Innovation and Expansion)	$8,830	0	0	0
Other (WIPA grant)	0	$100,000	0	0
Other (SS reimbursement)		$20,000		
Non-Federal Funds				
State Funds - match	$3,608	$22,988	0	$10,020
State Funds – general funds for IL services	0	349,899	0	00
Other	0	0	0	0

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. How Part B and Part C dollars will be used.

For an explanation related to the procedures and roles of the SILC and program manager see Section 1.2A.

The following is a description of the funds that support each of the 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; and Part C and Part C ARRA funds listed under General

CIL Operations. The goals supported by Part B, Part B ARRA, 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.

*During FY11, the Chapter 1, Part B, SILC Resource Plan includes $10,958 + $146,913 of the ARRA monies; Chapter 1 Part C, General CIL Operations includes $87,589 of ARRA funds that is planned to be spent by Summit ILC. During FY12, Chapter 1 Part C, General CIL Operations includes the ARRA funds that are planned to be spent by MILP and LIFTT each in the amount of $87,589.

<u>Goal one: To provide independent living (IL) services to as many people as possible in Montana.</u>

Objective 1: During each year of the plan, at least 233 new consumers will be found eligible and have services initiated by Montana's network of CILs.
This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 2: During each year of the plan, at least 50 activities that involve local advocacy to improve the lives of persons with disabilities in areas such as housing, transportation, accessibility, and youth transition will be carried out by Montana's network of CILs with SILC members being involved in at least 15 of the advocacy activities.
Examples include: advocating for increasing the accessible units in local housing programs; recruiting and orienting persons with disabilities to serve on local transportation advisory committees; and developing, coordinating, and promoting a local care giver conference.

This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 3: Each year of the plan, in order to monitor the provision of services, the DSU program manager will conduct a site visit to review case records, conduct interviews, and other activities necessary to assess the service delivery system of two CILs. As part of the evaluation of this goal a SILC representative will accompany the program manager on the site visit. Within sixty days following the site visit, a written report will be developed and delivered to the CIL director, with a copy to be delivered to the CIL board. A report will be provided to the full SILC at the SILC meeting following the site visit.
This objective is primarily supported by the Part B (including match) funds listed under Other SPIL Activities. These funds provide the salary of the program manager and the position's travel. The Part B (including match) funds listed under SILC Resource Plan support the transportation and other expenses that support the SILC representative.

Objective 4: Each year of the plan, the DSU will provide the administrative support necessary to compile the contracts to provide services through the CILs. As part of the evaluation of this goal, committee of the SILC will review and provide input on the contracts.

This objective is primarily supported by the Part B (including match) funds listed under Other SPIL Activities. These funds provide the salary of the program manager and other DSU personnel involved with the contract responsibilities.

Objective 5: During each year of the plan, the DSU program manager will consult with CIL directors and SILC members to gather information to draft a report for the Governor that will also be distributed to state legislators. The draft will be reviewed by the SILC chair and revised as necessary prior to final distribution.
This objective is primarily supported by the Part B (including match) funds listed under Other SPIL Activities. These funds provide the salary of the program manager.

<u>Goal two: To provide outreach to underserved populations in Montana to gain a better understanding of how to provide appropriate services to populations designated as underserved.</u>

Objective 1: Each year of the plan, each of the CILs under contract with the DSU will conduct at least one systems change activity (see explanation of systems change and examples in goal 1 objective 2) that supports an independent living issue of importance to consumers from one of the designated underserved populations. This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 2: Each year of the plan, the SILC will invite representatives from one of the identified underserved populations to present at a SILC meeting to provide guidance on methods of adapting the four core services to better serve that population. This objective is supported by the Part B (including match) funds listed under Other SPIL Activities. These funds provide the salary of the program manager who makes meeting arrangements. Also, the meeting funds provided under Title I listed in the SILC Resource Plan supports the costs of meetings, including travel costs for presenters if necessary.

Objective 3: Each year of the plan, the CILs will continue to collaborate with the urban Indian centers and other agencies located in their service area regarding outreach to appropriate consumers served by the urban Indian centers. The CIL directors will report on the outcomes of these collaborative efforts at a SILC meeting each year. This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 4: Before the end of the first year of this plan, the CIL directors will report to the SILC their plans for outreach to Native Americans who live off the reservations and outside of the communities where the urban Indian centers are located, and the results of outreach efforts. This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 5: Each year of the plan, the CILs will continue to collaborate with the Section 121 projects and other tribal programs on the reservations located in their service areas regarding outreach to appropriate consumers served by the 121 projects and other tribal programs. The CIL directors will report on the outcomes of these collaborative efforts at a SILC meeting each year. This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 6: Each year of the plan, at a SILC meeting, the CIL directors will present the initiatives they have carried out that year to outreach to the identified underserved populations groups and provide data and other evidence of the outcomes of those efforts. This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 7: Throughout the plan, the SILC will maintain a youth member (age 18-28) on the SILC. If the youth member ages out and continues on the SILC, another member meeting the age criteria will be recruited when a vacancy occurs. This objective is primarily supported by funds to support SILC meetings provided under Title I listed in the SILC Resource Plan support the costs of meetings. The Part B funds (including match) listed under the SILC Resource Plan also support activities of the youth member to be involved with committees and obtain training.

Objective 8: Throughout the plan, the SILC will have an active Underserved Committee that meets at least three times per year and provides guidance to the SILC on underserved populations, including evaluation of the efforts to outreach to the underserved populations. This objective is primarily supported by the Part B funds (including match) listed under the SILC Resource Plan. These funds support the activities of committees.

Objective 9: Throughout the plan, there will be a director or representative of 121 projects on the SILC. This objective is primarily supported by the Part B funds (including match) listed under the SILC Resource Plan. These funds support the activities of committees.

Objective 10: In order to meet the cross-disability responsibility of IL, the SILC will have one disability specific presentation at a SILC meeting each year of this plan to keep current with needs and initiatives of specific disabilities. This objective is primarily supported by Part B funds (including match) listed under Other SPIL Activities that provide the salary of the program manager who makes meeting arrangements. Also, the meeting funds provided under Title I listed in the SILC Resource Plan supports the costs of meetings, including travel costs for presenters if necessary.

Objective 11: Each year of the plan, at a SILC meeting, the CIL directors will report on their efforts to promote the Montana Medicaid for Workers with Disabilities Program so people with disabilities statewide can maintain Medicaid benefits on the job. This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 12: Throughout the plan, the SILC will support the efforts of the CILs to maintain and expand the Work Incentives Planning and Assistance Program. This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Objective 13: Each year of the plan the SILC will support training opportunities for youth with disabilities through the collaboration of youth programs and other agencies to increase the independent living and leadership skills of youth. The Part B funds (including match) listed under the SILC Resource Plan support activities for youth to obtain training.

Objective 14: The CIL directors will report on the outcomes of their outreach activities to improve the lives of youth with disabilities at a SILC meeting each year. This objective is primarily supported by the Part B (including match) funds and state general funds listed under IL Services.

Goal three: To support a statewide network of CILs.
Objective 1: At least every four years, a review of financial procedures will be arranged by the DSU at each Center to assist the CILs in developing effective financial procedures.
This objective is supported by Part B funds (including match) listed in the Other SPIL Activities. The funds support the costs of the program manager and other DSU personnel involved in the activities related to the objective as well as the indirect costs which support the services of the state auditors that perform the review.

Objective 2: Each year of the plan, by January 1, the DSU will coordinate and report on a consumer satisfaction survey of CIL consumers. A report on the analysis of the results will be presented to the SILC at the SILC meeting following the completion of the analysis. The report for each CIL will be presented to the director of the CIL within a week of completion of the report.
This objective is primarily supported by the Part B (including match) funds listed under Other SPIL Activities. These funds provide the salary of the program manager.

Goal four: To support involvement with other organizations that promote services or advocacy efforts related to the disability community**.**

Objective 1: Throughout the time period covered by this plan, maintain and support SILC or CIL representation (including reasonable expenses incurred for participation) with the following organizations that are involved with services and advocacy in the disability community:

- Montana Council on Developmental Disabilities
- Montana Association of the Blind
- Vocational Rehabilitation Council
- Disability Rights Montana
- Montana Association of the Deaf
- Others to be identified

Because many of the above organizations exert control over their membership, the commitment to be involved with the organizations does not apply if the organization chooses not to have a SILC or CIL representative.
Each year of the plan, representatives will provide a report on the activities of the organization during at least one meeting of the full SILC.
This objective is primarily supported by Part B funds (including match) listed in the SILC Resource Plan (for SILC member participation), in the Other SPIL Activities (for program manager participation) or Part C funds listed under General CIL Operation (to support CIL staff).

Objective 2: Each year of the plan, invite at least one presentation from appropriate groups that promote services or advocacy efforts. At least one presentation over the three year plan will be from an advocacy organization representing the elderly population.
This objective is primarily supported by the Part B funds (including match) listed under the SILC Resource Plan. These funds support the activities of committees.

Objective 3: Throughout the time period covered by the plan, maintain involvement on the national level with the following organizations:

- Association of Programs for Rural Independent Living (APRIL)
- National Council on Independent Living (NCIL)
- SILC Congress

Maintaining involvement will include sending a minimum of one representative (of the SILC, a CIL director or CIL staff, or DSU program manager) to national meetings, if funding allows, and obtaining reports from those representatives at SILC meetings.
This objective is primarily supported by Part B funds (including match) listed in the SILC Resource Plan (for SILC member participation), in the Other SPIL Activities (for program manager participation) or Part C funds listed under General CIL Operation (to support CIL staff).

Objective 4: In order to increase communication with Montana's elderly population and the agencies that serve them, the following activities will be carried out:

- The Montana CILs will work cooperatively with the Area Agencies on Aging in their regions to establish a "No Wrong Door" approach in service delivery for access to long term care services for people with disabilities and seniors through Aging and Disability Resource Center partnerships (ADRCs) and other collaborative efforts.
- The Montana CILs will collaborate with the Long Term Care Choices Coalition spearheaded by AARP to advocate improved Medicaid long term services and supports for people with disabilities and seniors.

This objective is primarily supported by Part B funds, Part C funds, and state general funds.

<u>Goal five: To coordinate independent living task forces to carry out legislative and systems advocacy efforts to address the statewide priority issues established at an October 2009 symposium held in Billings with 150 participants that included the directors and staff of all 4 Montana CILs, board members of some Montana CILs, SILC members, DSU staff and IL consumers. The independent living task forces established, and the priority statewide issues identified at the October 2009 symposium and reaffirmed at a second symposium held in Missoula in July 2010, are:</u>

Health Care Task Force

- Equalize Medicaid Medically Needy spend down amount with SSI income limit
- Advocate for additional HCBS waiver slots, maintenance of provider rate increases, and adequate funding for personal assistance services and other long-term services and supports
- Promote the Montana Medicaid for Workers with Disabilities (Medicaid Buy In) program so people with disabilities statewide can maintain Medicaid benefits on the job

Youth with Disabilities Task Force

- Explore possibilities to establish self-directed IEPs for high school students with disabilities statewide
- Advocate that VR counselors consistently begin attending IEPs when high school students turn 16 to improve transition outcomes statewide

Funding Issues Task Force

- Maintain adequate funding for Montana Centers for Independent Living & SILC
- Maintain adequate funding for programs that support independent living needs of consumers

Self Determination Task Force

- Establish a mechanism to ensure "Nothing About Us Without Us" in state government
- Advocate better enforcement of building code standards for accessibility statewide
- Advocate that any changes to Montana election laws such as mail balloting provide for accessibility and voting privacy for citizens with disabilities
- Advocate for the re-establishment of a specialized clinic or other means to accurately diagnose and treat people who experience post polio syndrome

Housing Task Force

- Promote the concept of visitability in new housing construction statewide to increase the stock of housing that is usable for people with disabilities
- Advocate for increased numbers of subsidized housing vouchers available across the state to expand options for affordable and accessible housing
- Promote Fair Housing issues to minimize discrimination and expand housing opportunities for people with disabilities

Transportation Task Force

- Increase coordination and advocacy resources for Transportation Advisory Committees so they may strengthen linkages and resources in and between Montana's communities
- Advocate for increased funding and expanded transportation resources not only to maintain current level services, but to increase services to address unmet needs
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Montana American Indian and Disability Initiatives Task Force

- Develop a statewide resource list of resources, programs and services available for American Indians with disabilities, particularly those living on reservations
- Advocate for Social Security liaisons or other means to increase acceptance of Indian health clinic (Indian Health Service or Tribal Health Clinic) doctors' diagnoses of people's disabilities

Public Relations/Education Task Force

- Develop talking point documents to be used by all four CILs to consistently promote independent living philosophy, services and systems advocacy/social change efforts statewide
- Develop statewide media contact lists to support ongoing media advocacy efforts

Objective 1: The Legislative/Advocacy Committee will meet at least quarterly throughout the term of the SPIL to work with the task forces to measure progress on legislative and systems change priorities and assist with any changes to existing priorities or the establishment of new priorities. Costs related to the Legislative/Advocacy Committee and task force activities are covered by the CILs, primarily through Part C funds listed under General CIL Operation. Time for the program manager in carrying out any assigned tasks will be covered under the SILC Other SPIL Activities of the budget.

Objective 2: By October 15, 2010, the task forces made up of consumers, CIL staff, and SILC members will have prioritized the above issues, and will have identified the following:

- The administration aspects of the issues, the possible legislative actions of the issues, and/or the general advocacy components.
- Potential need for additional funding, approximate amount of funding needed, and plan for determining the necessary funding level.
- At least five strong talking points supporting each issue.
- If the issue is too broad what are some bite size pieces that can be addressed.
- Who are some other possible champions that might assist with each issue?
- The overall priorities that can be accomplished given available time and resources.

Costs related to task force activities are covered by the CILs, primarily through Part C funds listed under General CIL Operation. Time for the program manager in carrying out any assigned tasks will be covered under the SILC Other SPIL Activities of the budget.

Objective 3: By January 1, 2011, in collaboration with the Legislative/Advocacy Committee, the task forces will have identified the issues that require grassroots legislative advocacy and the strategies for addressing the priority legislative issues during the 2011 Montana legislative session. Costs related to the Legislative/Advocacy Committee and task force activities are covered by the CILs, primarily through Part C funds listed under General CIL Operation. Time for the program manager in carrying out any assigned tasks will be covered under the SILC Other SPIL Activities of the budget.

Objective 4: By July 1, 2011, the task forces will have reviewed the impact of the recent Montana legislature on priority legislative issues and readjusted strategies on their goals based on the outcomes of the legislative session. Costs related to the Legislative/Advocacy Committee and task force activities are covered by the CILs, primarily through Part C funds listed under General CIL Operation. Time for the program manager in carrying out any assigned tasks will be covered under the SILC Other SPIL Activities of the budget.

Objective 5: By September 30, 2011, the Legislative/Advocacy Committee will coordinate with the Montana Independent Living Project to host a statewide symposium in Helena to review progress on task force priorities for legislative and systems change initiatives, re-prioritize issues impacting the disability community, and identify the issues that require grassroots legislative advocacy during the 2013 Montana legislative session. Costs related to the Legislative/Advocacy Committee and task force activities are covered by the CILs, primarily through Part C funds listed under General CIL Operation. Time for the program manager in carrying out any assigned tasks will be covered under the SILC Other SPIL Activities of the budget. Costs for the statewide symposium will be covered by Part B ARRA funds.

Objective 6: By January 1, 2012 the Legislative/Advocacy Committee will readjust the task forces to address the new priorities. Costs related to the Legislative/Advocacy Committee and task force activities are covered by the CILs, primarily through Part C funds listed under General CIL Operation. Time for the program manager in carrying out any assigned tasks will be covered under the SILC Other SPIL Activities of the budget.

Objective 7: By January 1, 2013, in collaboration with the Legislative/Advocacy Committee, the task forces will have identified the issues that require grassroots legislative advocacy and the strategies for addressing the priority legislative issues during the 2013 Montana legislative session. Costs related to the Legislative/Advocacy Committee and task force activities are covered by the CILs, primarily through Part C funds listed under General CIL Operation. Time for the program manager in carrying out any assigned tasks will be covered under the SILC Other SPIL Activities of the budget.

Objective 8: The task forces will each pursue at least one statewide systems advocacy or legislative priority each year during the three year term of the SPIL. Costs related to the Legislative/Advocacy Committee and task force activities are covered by the CILs, primarily through Part C funds listed under General CIL Operation. Time for the program manager in carrying out any assigned tasks will be covered under the SILC Other SPIL Activities of the budget.

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 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 1.3 A).

Beginning this new three-year SPIL starting October 1st, 2011, the Montana DSU, Disability Employment Independence and Transitions Programs, will provide $10,000 from the SSA program income to the LIFTT and 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 DEIT as follows: $181,799 for LIFTT, $90,480 for MILP, $170,789 for NCILS, and $17,895 for Summit. These funds will be used for the core IL services and to provide services for the identified underserved populations including Native Americans with disabilities, youth with disabilities, and persons with disabilities seeking employment. In

addition, for each year of the SPIL the Montana SILC and DSU (DEIT) have designated Part B monies as follows: $91,951 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 and ARRA monies will be used to address these services. Part C is allocated by the federal government for each year of the SPIL as follows: $90,180 for LIFTT, $260,462 for MILP, $101,190 for NCILS, and $333,047 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.
For an explanation related to the procedures and roles of the SILC and program manager see Section 1.2A.

Office space, office supplies, access to major office equipment (copier, fax, scanner, laptop computer, projector, etc), and access to DSU training funds 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 between 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 a 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 <u>Compatibility with Chapter 1 of Title VII and the CIL Work Plans – 34 CFR 364.42(c) and (e)</u>
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 individual and system 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 independent living services in Montana. During the service delivery system, consumers are exposed to the philosophies of independent living and a major part of the service delivery is learning that the consumer needs to be self empowered to get the support needed to achieve their goals. Also, the systems advocacy activities carried out in Goal one focus on implementing integration and inclusion of individuals with disabilities in mainstream of society. Goal five focuses on strategizing to overcome obstacles to the integration and inclusion of individuals with disabilities on the state and local level. The issues were all identified by groups that were almost wholly persons with disability, which incorporates the

philosophy of self determination. Leadership of the task forces that are implementing strategies to address the issues are primarily persons with disabilities. The end outcome of Goal five is that through addressing issues persons with disabilities will be empowered and will reduce barriers to persons with disabilities in Montana and consequently increase the independence and productivity of Montanans with disabilities.

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

The SILC incorporated a number of the CIL goals into SILS goals and those instances are noted in the goal section. The primary conduit for this incorporation was having a CIL director that was a member of the SPIL writing team who assisted with writing SILS goals. This representative got input from the other directors and represented the views of the other directors as well as his own on the committee. Also, at many meetings other CIL directors attended the meeting and spoke out on goals and other issues. Also, the primary overarching goal (goal 5), CIL directors and many CIL staff attended the October 2009 symposium that identified the areas that would be priorities for work on a statewide and a local basis. This is reflected in the fact that priorities that are mentioned in CIL goals such as housing, transportation and youth transition became priority areas in SILS goal 5.

1.5 <u>Cooperation, Coordination, and Working Relationships Among Various Entities – 34 CFR 364.26</u>

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.
    - 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 once a 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.
    - The DSU ex-officio member on the SILC is Peggy Williams. Peggy also staffs the Montana Vocational Rehabilitation (MVR) Council and this assists with coordination of the SILC with that council and MVR.

- The SILC maintains a representative on the MVR Council 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.

Also, as described in Goal 4, SILC members, CIL directors, and DSU staff are encouraged to participate in councils and organizations that are involved with disability issues. At each SILC meeting, those present are allowed time to discuss activities of other groups they are involved with. If the reports present possibilities for collaboration, often plans on how to pursue collaboration are developed and carried out.
Specific entities the DSU and the SILC cooperate and coordinate with are:

- Montana Council on Developmental Disabilities
- Montana Association of the Blind
- Disability Rights Montana
- Vocational Rehabilitation Council
- Montana Association of the Deaf
- Others to be identified

1.6 <u>Coordination of Services – 34 CFR 364.27</u>
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 duplication 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 developmental disabilities services 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 their position within the Department as a liaison for the CILs upon request by the CILs or SILC.
- One of the CILs has a staff person who serves on the board of directors of Disability Rights Montana.
- CIL staff members sit on local advisory councils of local mental health service authority organizations, which assist in the management of regional public mental health care.

- One CIL is the recipient of a WIPA contract through the Social Security Administration and gets regular updates on programs authorized under titles XVIII through XX of the Social Security Act. That CIL shares significant issues that come through this communication with other CILs and the SILC.
- A SILC member works as a volunteer member of the Vision Impairment Service Team at a veteran's medical service center and this assists in staying current with VA policies. Also, a major portion of his role is referring veterans to other local services and by keeping current on the local programs; it assists with coordination with the VA services.
- Some SILC members and CIL staff attend and present at the local Transportation Advisory Councils and some CIL staff are members of the SILC Transportation Task Force.
- Coordination with the OIB is described in the following section.

1.7 Independent Living Services for Individuals who are Older Blind – 34 CFR 364.28
Describe how the DSU seeks to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under the Older Individuals who are Blind program and that the DSU determines to be effective.
The DSU considers input from the SILC important on issues involving the state plan. The SILC has had discussions and a presentation 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. By the end of FY2011, Blind and Low Vision Services will set up an advisory committee to help provide input to the DSU on all aspects of the Blind and Low Vision Program including the Older Blind Program. The committee will have at least one representative who receives Older Blind services.

Section 2: Scope, Extent, and Arrangements of Services
2.1 Scope and Extent – 34 CFR 364.42(b)(2)(3); 34 CFR 364.43(b); 34 CFR 364.59(b)
2.1A Check the appropriate boxes in the SPIL Instrument table indicating the types of IL services to be provided to meet the objectives identified in section 1.2 of this SPIL, and whether the services will be provided by the CILs or by the DSU (directly and/or through contract or grant).

Table 2.1A: Independent living services	**Provided by the DSU (directly)**	**Provided by the DSU (through contract and/or grant)**	**Provided by the CILs (Not through DSU contracts/ grants)**
Core Independent Living Services, as follows:			
- Information and referral		X	X
- IL skills training		X	X
- Peer counseling		X	X
- Individual and systems advocacy		X	X
Counseling services, including psychological, psychotherapeutic, and related services		X	X

Table 2.1A: Independent living services	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/ grants)
Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with significant disabilities)		X	X
Rehabilitation technology		X	X
Mobility training		X	X
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services		X	X
Personal assistance services, including attendant care and the training of personnel providing such services		X	X
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services		X	X
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act		X	X
Education and training necessary for living in the community and participating in community activities		X	X
Supported living		X	X
Transportation, including referral and assistance for such transportation		X	X
Physical rehabilitation		X	X
Therapeutic treatment		X	X
Provision of needed prostheses and other appliances and devices		X	X
Individual and group social and recreational services		X	X
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options		X	X

Table 2.1A: Independent living services	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/ grants)
Services for children with significant disabilities		X	X
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities		X	X
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future		X	X
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities		X	X
Other necessary services not inconsistent with the Act		X	X

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

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.**

Montana allows service providers to charge consumers for the cost of services and to consider the ability of individual 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 <u>Arrangements for State-Provided Services – 34 CFR 364.43(d) and (e)</u>

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 described in SILS goal one objective three.

Section 3: Design for the Statewide Network of Centers

3.1 <u>Existing Network – 34 CFR 364.25</u>

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 2010 the existing network of CILs consists of four CILs and twelve branch offices with another planned to be opened at the end of the fiscal year. 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. The American Recovery and Reinvestment Act monies allowed for two branch offices to be opened during FY10 and another one will be opened at the end of the year. All of the CILs receive a mix of Part B, state General Fund (through contract), and Part C funds. Estimated distributions of state funds for Part B and General Funds are included in section 1.3B.

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, which is served by the Ronan office. The Kalispell office covers Flathead and Lincoln 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.

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 Glendive (Dawson County), Ashland (Big Horn/Rosebud Counties), Miles City (Custer County), and Hardin (Big Horn County) branch offices and the main office in Billings is housed in Yellowstone County. The LIFTT service area includes two American Indian Reservations – the Northern Cheyenne and Crow.

NCILS goal is to conduct 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, Chouteau, 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 within the counties of Glacier/Pondera, Fort Belknap Indian Reservation within the counties of Blaine/Phillips, Fort Peck Indian Reservation within the counties of Roosevelt/Valley/Daniels, and Rocky Boy's Indian Reservation within the counties of Hill/Chouteau.
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 consumers living within the seventeen county service area. NCILS continues to provide support and staff for branch offices in Valley, Roosevelt, and Daniels counties including 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 three 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 & 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 is in the process of initiating two additional branch offices via Part C ARRA funds; one in Dillon and one in Harlowton designed to "grow" services in local communities. Hopefully the "indigenous" based offices will minimize travel and outreach to

these remote portions of MILP's service area.
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) serves a population of 260,250 (27%).

3.2 Expansion of Network – 34 CFR 364.25
Describe the design for the further expansion of the network, including identification of the unserved and underserved areas in the State and the order of priority for serving these areas as additional funding becomes available (beyond the required cost-of-living increase).

The 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 split equally among the four Centers for Independent Living.

3.3 Section 723 States Only – 34 CFR 364.39
Montana is not a 723 state.

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

Section 4: Designated State Unit (DSU)
4.1 Administrative Support Services – 34 CFR 364.4; 34 CFR 364.22(b)
4.1A Describe the administrative support services to be provided by the DSU for the SILS (Part B) program and, if the State is a Section 723 State, for the CIL (Part C) program.
For an explanation related to the procedures and roles of the SILC and program manager see Section 1.2A.

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 include 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 and 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 manger is assigned to assist the SILC in implementation of the SPIL.
- DSU staff assists in arranging for SILC meetings, including committee meetings, and providing the 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.
- With SILC input, DSU staff draft and complete contracts related to SILS program. In addition the SILC and DSU collaborate in monitoring contract compliance, which includes site visits related to program visits and arranging reviews for financial compliance.
- 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, 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 the 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. Should the SILC establish itself as a 501 (c) (3) status, one of the activities that have been discussed is that the SILC could be more active in resource development because it would have the capability of receiving its own funds.

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

Section 5: Statewide Independent Living Council (SILC)
5.1 <u>Resource plan – 34 CFR 364.21(i)</u>
5.1A Describe the resource plan prepared by the SILC in conjunction with the DSU for the provision of resources, including staff and personnel, made available under parts B and C of chapter 1 of title VII, section 101(a)(18) of the Act, and from other public and private sources that may be necessary to carry out the functions of the SILC identified in section 705(c). The description must address the three years of this SPIL.
The sources of funding for the above budget are from (Part B + match) and $11,220 (Section 110 + match) with $5,000 from ARRA for the first year of this SPIL.

The Part B amount varies each year of the SPIL, but the Section 110 + match is expected to stay the same throughout 2011-2013.
In addition to the above budget, there are in-kind contributions from the DSU as described in Section 1.3 B (2).
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 and a significant amount of the program manager's time is dedicated to activities requested by the SILC.

The following is the budget for the first year of the SPIL:

Meeting Expenses (includes travel to meetings):	$16,220
Consulting:	$ 2,500
Supplies:	$ 200
Communications:	$ 1,050
Travel:	$ 5,625
Other:	$ 3,000
Total:	$28,595

The following is the budget for the second and third year of the SPIL:

Meeting Expenses (includes travel to meetings):	$14,021
Consulting:	$ 2,250
Supplies:	$ 200
Communications:	$ 1,000
Travel:	$ 4,425
Other:	$ 1,500
Total:	$ 23,396

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 within the DSU fiscal operation. While approval within the fiscal system 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 SILC has allocated $150,000 of the American Recovery and Reinvestment Act (ARRA)

funds to conduct three IL symposiums, of which one took place in October 2009, the next will take place in July 2010, and the third will take place in September 2011. The SILC Legislative/Advocacy Committee has taken a lead role in the planning and implementation of these activities and the CILs have agreed to share part of the cost.
The SILC has reviewed the budget carefully and believes it can meet its obligations in the SPIL.

– **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.

5.2 <u>Establishment and Placement – 34 CFR 364.21(a)</u>

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

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 chair 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.

The SILC will explore the option of the SILC establishing a 501 (c) (3) to establish a legal status outside of the DSU and to have a mechanism for receiving and independently administering the funds in the SILC resource plan. Further actions and timelines will be determined by the end of the first year of this plan.

Should the above procedure result in a recommendation of not pursuing a 501 (c) (3) or the plan for the pursuit of this status proves unsuccessful, the SILC will review whether or not to pursue other options related to placement within the state government.

5.3 <u>Appointment and Composition – 34 CFR 364.21(b) – (f)</u>
Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b).

- 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. 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 to be maintained in their SILC manual.

5.4 <u>Staffing – 34 CFR 364.21(j)</u>
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 chair of the SILC is consulted in developing the evaluation of the DSU program manager and will note if there are deficiencies in the program manger's performance with regard to responsibilities related to the SPIL and other duties as assigned by the SILC. Also, the current supervisor of the DSU program manager is the ex-officio member from the DSU on the SILC and is member of SPIL Evaluation Committee which conducts ongoing evaluation of SPIL progress. 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 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.

Section 6: Service Provider Requirements

6.1 <u>Staffing – 34 CFR 364.23; 34 CFR 364.24; 34 CFR 364.31</u>

- **Inclusion of personnel who are specialists in the development and provision of IL services and in the development and support of centers.**
- **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.**
- **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.**
- **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. Compliance by the service providers is monitored by reviewing the annual reports of the contractors and site visits described earlier in this plan.

6.2 <u>Fiscal Control and Fund Accounting – 34 CFR 364.34</u>

- **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. Compliance by the service providers is monitored by reviewing the annual reports of the contractors and financial reviews as described earlier in this plan.

6.3 <u>Recordkeeping, Access and Reporting – 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37</u>

- **Maintenance of records that fully disclose and document the information listed in 34 CFR 364.35.**
- **Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate**
- **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 are included in the contracts for IL services. 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 – 34 CFR 364.40; 34 CFR 364.41

- **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.**
- **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.**
- **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.**
- **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.**
- **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. Compliance by the service providers is monitored by reviewing the annual reports of the contractors and site visits described earlier in this plan.

6.5 Independent Living Plans – 34 CFR 364.43(c)

- **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 contracts for IL services. Compliance by the service providers is monitored by reviewing the annual reports of the contractors and site visits described earlier in this plan.

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

- **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.**

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

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

– 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.

Requirements to meet the above criteria, as well as HIPAA requirements, are included in the contracts for IL services. Compliance by the service providers is monitored by reviewing the annual reports of the contractors and site visits described earlier in this plan.

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. <u>34 CFR 364.38</u>

The following narrative describes the state's evaluation plan, including methods for the periodic evaluation of the effectiveness of the SPIL in meeting the objectives.

- 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 objectives and activities of the SPIL. The SPIL Evaluation Committee will review the evaluation chart on at least twice a year to monitor progress of SPIL objectives. Should there be a need for a plan to address areas where objectives are not meeting the expectations of the SPIL, a strategy will be developed by the committee to address the issue and forwarded to the Executive Committee for approval and implementation.
- Yearly self-evaluations by the CILs to meet the expectations of the 704 reporting system.
- Quarterly Part B and General Fund 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 by the SILC and IL program manager from the DSU.
- 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 independent living programs to improve, change, or support center activities.
- The SILC SPIL Evaluation Committee and the DSU, with participation of the CILs, will review, evaluate and report on compliance of the SPIL. The SILC will review and discuss progress on achieving SPIL objectives at least annually at a SILC meeting.
- At the SILC symposium, evaluation forms will be distributed to participants including consumers then collected and tabulated to assess the symposium success and assist with planning subsequent symposiums.
- Discussions/interviews with consumers.

Section 8: State-Imposed Requirements

The following narrative describes the State's evaluation plan, including methods for the periodic evaluation of the effectiveness of the SPIL in meeting the objectives.

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

In order to utilize the state accounting system 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 & 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 a 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 independent living program.