

State: WYOMING

**STATE PLAN FOR
INDEPENDENT LIVING
(SPIIL)**

**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 2014-2016

Effective Date: October 1, 2013_____

OMB NUMBER: 1820-0527

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.

People with disabilities are full, equal, and active participants in Wyoming. This is the mission of the IL system.

Existing systems for the delivery of IL Services operate efficiently. As resources become scarcer, the IL system sees the need to become more efficient. This will occur through using other resources that are available and knowledge that peer mentors may have.

Formerly underserved populations are served. It has been found that Wyoming has many underserved populations. This goal is to serve more of these populations.

The SILC and CILs work together. The SILC and CILs believe that services can be improved as they work better together.

Formerly unmet needs of consumers are filled, including, but not limited to: housing, recreation and entertainment, and transportation. These are needs that the most recent needs assessment found were pressing.

1.2 Objectives – 34 CFR 364.42(a)(1) and (d); 34 CFR 364.32; 34 CFR 364.33

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

The CILs collaborate with other disability organizations to provide services. Time frame 10/1/2013 – 9/30/2016

Peer mentors assist consumers with achieving goals. Time frame 10/1/2013 – 9/30/2016

Outreach to underserved populations is provided. Time frame 10/1/2013 – 9/30/2016

Individuals 30 and under are receiving services. Time frame 10/1/2013 – 9/30/2016

Outreach to the schools is provided. Time frame 10/1/2013 – 9/30/2016

Funding sources that would enable CILs to provide Independent Living services to underserved populations are utilized. Time frame 10/1/2013 – 9/30/2016

SILC members know their statutory duties. Time frame 10/1/2013 – 9/30/2016

SILC members understand CILs and CILs in Wyoming. Time frame 10/1/2013 – 9/30/2016

Grassroots advocacy is developed. Time frame 10/1/2013 – 9/30/2016

Information and referral, education and skills training for housing, recreation and entertainment, and transportation options are provided to consumers. Time frame 10/1/2013 – 9/30/2016

CILs apply for additional grants and other funding sources to increase consumer access to housing, recreation and entertainment, and transportation options. Time frame 10/10/2013 – 9/30/2016.

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;

Target populations for outreach efforts include: consumers in Sublette, Teton, Crook, Carbon, Albany, Sheridan, and Laramie Counties; consumers who are age of 30 and under; and consumers transitioning out of a school setting.

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

Statewide outreach is planned for consumers that are age of 30 and under, and consumers transitioning out of a school setting. Specific outreach is planned for consumers in Sublette, Teton, Crook, Carbon, Albany, Sheridan, and Laramie Counties, because those counties are generally underserved.

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

WILR and WSIL's services are available to any person with a disability, without regard for race, creed, national origin, gender or type of disability. We participate in extensive outreach and networking to inform potential consumers, social service agencies and other interested parties and stakeholders regarding our services.

Both Centers keep records and case file data to use as an internal check that our outreach efforts are being utilized to reach all persons, including minorities, on a cross-disability basis. CIL management can look at empirical data from CSR's as well as the nature of CIL outreach activities to ensure that there is a representation of minorities. Corrective action can be taken as needed if a CIL discovers that a minority group is not being adequately provided with IL Services.

An example of this is that WSIL has continued to increase its outreach to the Native American

Population, both directly on the Wind River Indian Reservation (WRIR), and to the Native Americans who do not live at WRIR. WRIR is a major geographic and population center in Western Wyoming. Just a few years ago, WSIL had negligible participation at WRIR. This year, the number of consumers WSIL served at WRIR was 67 as compared with 55 last year. Likewise, WSIL served 83 Native Americans through our IL program this year as compared with 62 last year. WSIL has experienced similar growth in each of program at WSIL. Additionally, a WSIL staff member has been asked to speak at two different regional tribal conferences on the partnerships WSIL has developed with different tribal services.

1.3 Financial Plan – 34 CFR 364.42(a)(2) and (3); 34 CFR 364.29

Describe in sections 1.3A and 1.3B, below, the financial plan for the use of Federal and non-Federal funds to meet the SPIL objectives.

1.3A Financial Plan Tables

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

- Insert additional rows for the specific funding sources and amounts expected within the categories of Other Federal Funds and Non-Federal Funds.

Year 1 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B		295461		
Title VII Funds - Chapter 1, Part C			817141	
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	15055			4620
Other Federal Funds - Other				
Non-Federal Funds -State Funds	4074	32829		43976

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Non-Federal Funds - Other				

Year 2 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B		295461		
Title VII Funds - Chapter 1, Part C			817141	
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	15055			4620
Other Federal Funds - Other				
Non-Federal Funds -State Funds	4074	32829		43976
Non-Federal Funds - Other				

Year 3 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B		295461		

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part C			817141	
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	15055			4620
Other Federal Funds - Other				
Non-Federal Funds -State Funds	4074	32829		43976
Non-Federal Funds - Other				

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.

Part C funds will support SPIL objective #6 and #11, funding sources that would enable CILs to provide Independent Living services to underserved populations are utilized and CILs apply for additional grants and other funding sources to increase consumer access to housing, recreation and entertainment, and transportation options. Part B and Part C funds will support Objectives #1- 5 and 10. These objectives are: the CILs collaborate with other disability organizations to provide services; peer mentors assist consumers with achieving goals; outreach to underserved populations is provided; individuals 30 and under are receiving services; outreach to schools is provided; and information and referral, education and skills training for housing, recreation and entertainment, and transportation options are provided to consumers.

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.

The full \$295,461 part B funding and its state match of \$32,829 will be provided to the CILs for providing independent living services.

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.

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

NA

1.4 Compatibility with Chapter 1 of Title VII and the CIL Work Plans – 34 CFR 364.42(c) and (e)

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 SPIL Objectives are consistent with this Act because they incorporate and promote the essential elements of the Independent Living Philosophy, specifically Consumer Control via the SILC and the CILs. The Mission, per this report, is to ensure that people with disabilities are full, equal and active participants in Wyoming. This applies on a cross-disability basis with emphasis on providing Independent Living services to underserved populations. Each goal and objective that has been established to fulfill this mission can only be accomplished by utilizing one or more of the four core services of independent living: Information & Referral, Independent Living Skill Training, Peer Counseling and Individual/Systems Advocacy. Furthermore, the specific tactics that will be utilized to achieve these objectives will help consumers empower themselves through obtaining appropriate housing, transportation, mobility, recreation, medical care, self care, assistive technology, quality of life, employment and overcoming any other barrier to living independently that is identified by individual consumers.

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 Wyoming SPIL has been developed through collaboration with the CIL Directors, input from other CIL staff, the DSU and SILC Members. The collaboration has been occurred by the following means, including the Work Plan submitted by each of Wyoming's CILs.

1. The SILC commissioning an IL Funding Formula to determine what level of funding is needed for Wyoming CILs to be on equal financial footing – and thus be able to provide additional services - with similarly situated CILs in other states.
2. The CILs and SILC engaged in a joint advocacy project to promote the funding formula report to Wyoming's Governor.
3. The SILC commissioned a Needs Assessment report to identify unmet Independent Living goals, which involved significant collaboration from the CILs and support from the DSU.
4. The SILC Board as a whole has been educated and updated on all these events and processes.

5. The State Plan committee of the SILC has been duly apprised and informed of this information and has generally met once per quarter to discuss issues related to the current State Plan. The State Plan committee is comprised of a CIL Director, DSU Representative, CAP Representative and SILC members. Wyoming's other CIL Director has also been an active participant in these discussions.

6. The State Plan committee has met numerous times by conference call to work on developing the new state plan and has exchanged various ideas and proposals through these calls and numerous e-mails.

1.5 Cooperation, Coordination, and Working Relationships Among Various Entities – 34 CFR 364.26

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.

There are formal and informal cooperation, coordination and working relationships among entities that directly or indirectly provide Independent Living Services in Wyoming.

Both of Wyoming's CILs have formal agreements that effectuate their ability to provide Independent Living services throughout the state. These include Part C contracts with RSA; Part B Contracts with the DSU - Workforce Services, Division of Vocational Rehabilitation; AgrAbility Contracts with the University of Wyoming, Mobility Management Contracts with the Wyoming Department of Transportation, and agreements with the Wyoming Department of Health to manage the Consumer Directed option for the long-term in home care waiver and Project Out programs. Additionally, one of the CILs, WILR, administers the WYTAP loan program for assistive technology. In addition to their formal duties, the SILC and DSU provide guidance and support to the CILs in these endeavors.

The CILs routinely collaborate with outside parties to help Consumers achieve Independent Living goals. These parties include local transportation providers, senior centers, home health agencies, tribal organizations, assistive technology providers, third party foundations, nursing homes, DBTAC, groups such as MS Society and American Diabetes Association, local peer support groups, and the various State agencies, including the Department of Health, Department of Aging, Department of Transportation and Department of Workforce Services.

1.6 Coordination of Service – 34 CFR 364.27

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.

If an OIB consumer has independent living needs beyond vision, the consumer will be referred to the independent living program, either at WILR or WSIL.

The CILs will work with special education at the Wyoming Department of Education and local school districts by providing disability awareness training to students in the classroom. The CILs will also work with the school districts in assisting students with disabilities in transitioning to independent living.

WILR serves on the University of Wyoming, Wyoming Institute for Disabilities' advisory council for Title 11 Assistive Technology Act. WILR administers the Wyoming Technology Access Program (WYTAP), a low interest loan program to allow consumers to access assistive technology.

The CILS assures that consumer with disabilities have the independent living skills necessary to allow them to consider using DVR services for employment goals.

Public Health Nursing is the single provider conducting assessments for determining medical Medicaid eligibility for the Consumer Directed Care program that both CILs administer. Public health nursing also provides home health services in many communities and the CILs coordinate with them to ensure that consumers are receiving the services needed to remain independent in their homes.

The CILs provide referrals to mental health services statewide.

The CILs coordinate with the transportation providers to connect people with disabilities to option and connect them with to the Transportation Check Program that is provided to the CILs from the Wyoming Department of Transportation.

Wyoming Department of Family Services determines the consumer's financial Medicaid eligibility. Both CILs work with the State Medicaid office to provide the Consumer Directed Care program and Project Out, nursing home transition and diversion. The CILs receive referrals from the Department of Family services of those that need independent living services.

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 program consultant that works with the Older Individuals who are Blind program will consult with other states regarding approaches that are new and may work in Wyoming.

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)
Table 2.1A: Independent living services			
Core IL Services - Information and referral	N	Y	Y
Core I L Services - IL skills training	N	Y	Y
Core IL Services - Peer counseling	N	Y	Y
Core IL Services - Individual and systems advocacy	N	Y	Y
Counseling services, including psychological, psychotherapeutic, and related services	N	N	N
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)	N	Y	Y
Rehabilitation technology	N	Y	Y
Mobility training	N	Y	Y
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	N	N	N
Personal assistance services, including attendant care and the training of personnel providing such services	N	N	N
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	N	Y	Y

	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/ grants)
Table 2.1A: Independent living services			
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	N	Y	Y
Education and training necessary for living in the community and participating in community activities	N	Y	Y
Supported living	N	N	N
Transportation, including referral and assistance for such transportation	N	Y	Y
Physical rehabilitation	N	N	N
Therapeutic treatment	N	N	N
Provision of needed prostheses and other appliances and devices	N	Y	Y
Individual and group social and recreational services	N	Y	Y
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	N	N	N
Services for children with significant disabilities	N	Y	Y
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	N	N	N
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	N	Y	Y
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	N	N	N
Other necessary services not inconsistent with the Act	N	Y	Y

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

The objectives in Section 1.2 specifically refer to improving IL services on a statewide basis to individuals that are age of 30 and under, individuals that are transitioning from a school environment, as well as improving services in underserved counties: Sublette, Teton, Crook, Albany, Sheridan, Carbon and Laramie.

2.1C If the State allows service providers to charge consumers for the cost of services or to consider the ability of individual consumers to pay for the cost of IL services, specify the types of IL services for which costs may be charged and for which a financial need test may be applied, and describe how the State will ensure that:

- Any consideration of financial need is applied uniformly so that all individuals who are eligible for IL services are treated equally; and
- Written policies and consumer documentation required by 34 CFR 364.59(d) will be kept by the service provider.

Indicate N/A if not applicable.

NA

2.2 Arrangements for State-Provided Services – 34 CFR 364.43(d) and (e)

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.

The DSU will contract with the two CILs (WILR and WSIL) to provide IL services. The funding will be Part B funds with the required state match. The types of services to be provided will be helping individuals with a disability identify barriers to living independently, develop a plan to overcome the barrier and put the plan into action. The CILs utilize the four core services of Independent Living to help consumers accomplish these goals and remove barriers to independence. The specific mechanism by which the CILs deliver these services is through the award of Part B funding from the DSU – Department of Workforce Services, Division of Vocational Rehabilitation. Each Center for Independent Living submits an application for the continuation of funding describing the Independent Living Services to be provided, along with a specific budget outlining exactly how the funds will be spent. A formal agreement is then developed and executed between each respective CIL and the DSU. Each CIL has a specific geographic area for which it provides services. Each CIL submits a quarterly report to the DSU and SILC describing the Independent Living Activities that they have engaged in for that quarter. Likewise, each CIL submits monthly billing statements to the DSU detailing how they have spent the Part B funds.

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.

Wyoming's State Plan for Independent Living delineates that the DSU contract with Wyoming's two Centers for Independent Living to provide specific IL services, and not the general operation of the Center. Wyoming Independent Living and Rehabilitation, (WILR), provides IL services in

eastern Wyoming. Wyoming Services for Independent Living, (WSIL), provides IL services in western Wyoming. A specific element to these contracts delegates authority for determining eligibility for services to the respective CILs.

Section 3: Design for the Statewide Network of Centers

3.1 Existing Network – 34 CFR 364.25

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.

The entire state is served by two Centers for Independent Living, each of which receives Part C funding. The eastern half of the state is serviced by Wyoming Independent Living Rehabilitation (WILR) and the western half of the state is served by Wyoming Services for Independent Living (WSIL). Specifically, WILR serves Sheridan, Johnson, Campbell, Crook, Weston, Natrona, Converse, Niobrara, Goshen, Platte, Albany, and Carbon Counties. WSIL serves Park, Big Horn, Hot Springs, Washakie, Teton, Fremont, Sublette, Sweetwater, Lincoln, and Uinta Counties. WSIL also serves the Wind River Indian Reservation. Both CILs also receive Part B and state matching funds.

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).

Wyoming does not have any unserved geographic areas. However, there are some counties and populations that are underserved. Statewide, consumers thirty years and younger and consumers transitioning from school, are underserved. These are the first priority populations to be served. The identified geographic underserved populations in the Western part of the state are Sublette, and Teton Counties. The priorities in serving them as additional funding becomes available are in that order. The underserved areas in the Eastern part of the state are Crook, Carbon, Albany, Sheridan, and Laramie Counties. The priority order in serving them as additional funding becomes available are Crook, Laramie, Albany and Carbon, and Sheridan Counties.

The formula for distributing excess funds over the COLA to the existing Part C Centers will be 63.11% to WILR and 36.89% to WSIL. This proportion is based on total population in the catchment areas. The excess funds over the COLA distributing to the existing Part C Centers would be used to serve underserved populations and areas.

If a CIL were to give up its Part C Grant, the unused funding would be subject to a competitive bidding process made available to existing and prospective new Centers according to the RSA bidding process. This bidding process would re-establish a center in the vacated area.

3.3 Section 723 States Only – 34 CFR 364.39

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.

NA

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.

NA

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.

- Refer to the SPIL Instructions for additional information about administrative support services.

The DSU's administrative support services for the SILS (Part B) program will include guidance in planning the Part B contracts and budgets. The DSU will evaluate Center activities through receiving and reviewing written quarterly reports, reviewing case files quarterly, and doing an annual on-site visit. The DSU will receive and review copies of the Centers' audit report. The DSU will also provide technical assistance to the SILC with regards to their budget. The DSU will provide written reports to help them to evaluate the implementation of the SPIL. These administrative support services are supported through state general funds.

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

NA

Section 5: Statewide Independent Living Council (SILC)

5.1 Resource plan – 34 CFR 364.21(i)

5.1A Describe the resource plan prepared by the SILC in conjunction with the DSU for the provision of resources, including staff and personnel, made available under parts B and C of chapter 1 of title VII, section 101(a)(18) of the Act, and from other public and private sources that may be necessary to carry out the functions of the SILC identified in section 705(c). The description must address the three years of this SPIL.

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

The SILC will be receiving an increase in funding as compared to previous SPILs because the DSU director wanted to bring the SILC's funding in line with the SRC's. The SILC will receive

\$19,129 in each year of the SPIL. This money is from section 101(a)(18) funding and its state match. There is no staff for the SILC.

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 SILC reviews a plan for their budget at the beginning of the fiscal year. They make adjustments as necessary. The SILC reviews its expenditures and obligations at each quarterly meeting.

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

There are no conditions or requirements in the SILC resource plan that would compromise the independence of the SILC.

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

The SILC looks to maximize its budget as it monitors its obligations on a quarterly basis. The resources are only available during the fiscal year that the meeting is held.

5.2 Establishment and Placement – 34 CFR 364.21(a)

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

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

The SILC was established by governor’s executive order. The Wyoming Secretary of State states that the SILC is a quasi-governmental agency based on the fact that the governor appoints members to the Council. The SILC is free standing.

5.3 Appointment and Composition – 34 CFR 364.21(b) – (f)

Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b).

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

The governor appoints members to the SILC. The SILC ensures that the SILC composition and qualifications are met through the SILC reviewing applications and voting on sending them to the Governor. The SILC elects a chair every two years. Term limits are maintained through a member not being re-appointed when they have served two terms. A CIL representative is a

member of the SILC when the director is not. SILC vacancies are filled in the same manner as original appointments.

5.4 Staffing – 34 CFR 364.21(j)

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 Wyoming SILC has chosen not to hire staff.

- 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.

When the DVR program consultant, who is the liaison to the SILC, is working on assignments with the SILC, DVR does not assign other duties that would create a conflict. If the consultant feels that a conflict is occurring, the consultant will alert the DVR administrator for resolution. If the SILC feels that a conflict is occurring, the SILC chair will alert the DVR administrator for resolution.

Section 6: Service Provider Requirements

Describe how the following service provider requirements will be met:

6.1 Staffing – 34 CFR 364.23; 34 CFR 364.24; 34 CFR 364.31

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

Both Centers for Independent Living employ individuals with appropriate professional backgrounds who have the ability to carry out the duties necessary to deliver services to individuals with a disability throughout Wyoming. Both Centers recruit widely from the community and encourage individuals with a disability to apply for open positions. Each individual that is hired by WILR and WSIL goes through training on the History and Philosophy of Independent Living, understanding and utilizing the non-medical model, and the elements of Consumer Control. This training is performed in-house by experienced CIL staff and management. New staff members also participate in outside trainings such as on-line classes and webinars as appropriate. New staff members are also trained in the specific program that they may be working in and how the four core services, consumer control and the IL Philosophy apply to whatever their job duties entail. Additionally, both Centers provide ongoing training, education and support for staff.

- 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.

The two CILs utilize alternative formats of communication, depending on the needs of each individual consumer to ensure that a full and complete dialogue is accomplished between the CIL and the consumer. Each CIL has TTY available and that number is provided on CIL publications. Consumers are informed that they will have access to alternative formats of communication depending on their individual needs and choices, such as Braille, and ASL interpreter, and foreign language interpreters. CIL Staff work with consumers to help resolve communicative barriers as part of Independent Living Plans, by helping them acquire items such as communication boards and iPad speech applications. The Centers help obtain communicative devices from private vendors, statewide assistive technology loan services and CIL loan closets. The Wyoming Relay program, operated through Wyoming Vocational Rehabilitation is an important part of the communication equation by engaging in equipment distribution, including: amplified telephones, TTY, signaling devices; as well as training and information and referral.

A secondary component is that CIL staff members travel to meet with consumers at a location of the consumer's choice, usually the consumer's home. This is important because making the extra effort to go to a consumer's home allows the consumer to utilize existing in-home physical and communicatory supports, thus enhancing the dialogue.

- 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.

Both Centers for Independent Living Conduct a minimum of two in-services a year, which are designed to provide additional proficiency and expertise to the delivery of Independent Living Services. Likewise, both agencies also send staff to relevant seminars and training opportunities, as feasible, to maintain and improve IL proficiencies. Examples of these opportunities include: APRIL National Conference, NCIL National Conference, Regional and National ADA Training, Nursing Home Transition/Diversion Conferences, Assistive Technology Conferences and Training, WYTRANS Conference, Regional Transportation Conferences, Specialized Low Vision training, Acquired Brain Injury Conference, Statewide MEGA Conference, IL Net and ILRU Training/Classes, among others.

- 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.

Both WILR and WSIL have specific policies that commit the respective agencies to equal employment opportunities and practices for both hiring and promoting regardless of Age, Color, Creed, Gender, National Origin, Race, Religion or Disability. Additionally, both agencies recruit widely for open positions and encourage individuals with a disability to apply. Both Centers make sure that more than 50% of overall staff and more than 50% of those with decision making

capacities are individuals with a disability.

6.2 Fiscal Control and Fund Accounting – 34 CFR 364.34

- 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.

WILR and WSIL both follow the regulations as described above, and both CILs undergo an annual audit by an outside firm to ensure that such regulations are being followed and to identify actions or practices that need to be corrected to remain in compliance. The results of this audit are reported to RSA, DSU and other appropriate parties. WSIL retains an outside accounting firm to assist with its financial reporting and provide consultation as needed to help ensure compliance.

Both CILs access Part C funds, and expend them in the manner and time frames established by EDGAR and OMB A-122. WILR receives payments for Part B funds from the DSU on an advance basis. WILR submits a beginning cash balance for the month, anticipated expenditures to be paid during the month, month ending cash balance and projected cash needs. These figures determine the amount to be advanced for the month. WSIL uses unrestricted funds to pay up front for matters allowed under its Part B contract with the DSU. WSIL then submits an invoice to the DSU at the end of each month specifying what it actually spent that month for Part B, and requesting payment in that amount. Both agencies submit year-end financial reports to the DSU summarizing how they spend their funds during the year.

6.3 Recordkeeping, Access and Reporting – 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37

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

WILR and WSIL are notified each summer by RSA and the DSU of what their grant award will be for the upcoming fiscal year. WILR and WSIL then submit proposed yearly budgets for Part C and Part B funds to RSA and the DSU, respectively, for review and approval prior to the beginning of that fiscal year. Once the proposed budgets are approved, they must be strictly followed and any subsequent changes must be expressly approved by the Grantor. Each CIL maintains records demonstrating that the Part B and Part C funds are used in the manner approved by the Grantor. Each CIL accesses these funds under the proscribed method called for by each Grant and Contract, by the submission of monthly financial data related to the projects and the corresponding request for payment per the Grants.

Each CIL also provides quarterly reports to the DSU and SILC of detailing the activities that they have undertaken to date.

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

Each CIL submits quarterly performance reports to the DSU and SILC to detail the activities that they have performed during that time period. Each CIL also submits monthly billing and funding requests to RSA and the DSU to access the funds related to their Grant awards. The CILs submit an annual financial summary to the DSU describing how the Part B funds were used over the course of the year and they submit the 704 Report and SF425 Reports to RSA detailing project funds, overall CIL operations and achievements. WILR and WSIL also are subject to an annual audit to ensure compliance with all laws and regulations. The audit is performed by an outside accounting firm and the results are given to RSA, the DSU and other appropriate parties. The CILs are required to institute corrective action for any areas of non-compliance.

- 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.

WILR and WSIL maintain detailed financial records showing how all funds from Part B and Part C awards have been spent in accordance with the approved budgets. Detailed records are also kept for all other sources of funding for the CIL and its other programs. Likewise, they maintain a CSR for every consumer served. Each CSR contains all of the required information concerning eligibility, consumer rights, CAP and the details of services performed. All of this information is available and necessary for the annual audit that is performed by an outside accounting agency, as well as any site visits or other inquiry that may be performed by RSA, OIG, the DSU and other appropriate parties.

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.

WILR and WSIL provide Independent Living Services to any individual with a significant disability who seeks such services.

WILR determines the eligibility of consumers by receiving a signature on a release of medical information and consumer rights (HIPAA), then requesting medical information to document a significant disability.

WSIL determines the eligibility of consumers during an in-person meeting where the consumer describes their disability and barriers caused by such disability. The consumer certifies by statement and signature to WSIL that they have significant disability that interferes with living independently.

- 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.

WILR and WSIL provide the direct service of Information and Referral to consumers who seek information about IL services through the agencies, other related programs offered by one of the

CILs and to any external agency, group or other resource that is of interest to a consumer. WILR and WSIL also provide Information and Referral to any person who contacts our agency with questions or seeking information about our services or other related services.

- 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.

WILR and WSIL engage in a full consultation with the consumer and keep records that support the consumer's status of having a significant disability, showing that such a determination has been made and has been duly signed and dated by the appropriate staff member. Any determination of ineligibility is documented in a similar manner. If a consumer is found to be ineligible, the CILs, in accordance with the regulation, provide the consumer of this decision in writing, along with their full rights as to how to file for a review of this determination, as well as the manner for contacting CAP.

- 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.

WILR and WSIL provide services to consumers of all types of disability, without regard to age, color, creed, gender, national origin, race or religion. No part of the processes of the application, eligibility determination or delivery of services takes any of these considerations into account.

- 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.

WILR and WSIL provide Independent Living services to any consumer in its respective service area, regardless of the residence status of the consumer.

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.

Both WILR and WSIL develop Independent Living Plans jointly with each Consumer. The ILP reflects the barrier identified by the consumer and their goal for independence. The ILP also shows a step by step plan that has been developed with the Consumer whereby the four core services are utilized to overcome the barrier and accomplish the goal. Prior to the development of the ILP, each consumer is educated on their right to waive the ILP if they choose.

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.

CAP is available to applicants, consumers and former consumers as a way to resolve any questions, concerns or disputes that he or she may have involving one of the CILs. A consumer is given information on their rights and how to contact CAP at the time of application, development of an ILP, Amendment of an ILP and at the closure of a case. Alternative formats of communicating CAP information are made available upon request depending on the specific request of the individual consumers.

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

- 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.

Both WILR and WSIL utilize Confidentiality policies that protect a consumer's private and personal information that the agencies may gain knowledge of. The policies prohibit disclosing this information to any outside source or using it for any other purpose than the delivery of requested IL Services. A signed release is obtained from a Consumer giving permission to speak with an outside source about the Consumer prior to any such discourse. These policies are specifically communicated to new employees during their orientation, and each new employee signs a statement agreeing to abide by it, and is part of each agency's general policy manual. Additionally, each staff member is trained on the elements and requirements of HIPAA.

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. 34 CFR 364.38

People with disabilities are full, equal, and active participants in Wyoming and existing systems for the delivery of IL Services operate efficiently: The CILs will measure the number of other disability organizations that they have collaborated with. The CILs will measure the information and referral to outside support groups, the number of peer mentors trained, and the number of peer mentoring activities provided by the CIL or CIL staff. The outcomes surveys will measure consumer satisfaction.

People with disabilities are full, equal, and active participants in Wyoming and formerly underserved populations are served: The CILs will measure the number of outreach activities that they engage in. The CILs will measure the number (or percentage) of individuals age thirty and younger that they are serving. The CILs will measure the number of outreach activities that they do with the schools. The CILs will measure the number of funding opportunities that they have applied for and the amount of continuous funding applied for.

People with disabilities are full, equal, and active participants in Wyoming and the SILC and

CILs work together: The SILC will measure the percentage of SILC members that know their statutory duties. The SILC will measure the percentage of SILC members that understand CILs and CILs in Wyoming. The SILC will measure the number of outreach activities for advocacy by SILC members.

People with disabilities are full, equal, and active participants in Wyoming and formerly unmet needs of consumers are filled, including but not limited to housing, recreation and entertainment, and transportation: The CILs will measure the number of instances of information and referral, education and skills training done by CIL staff on these topics and measure the number of grants/funding sources applied to by the CILs to address these topics.

Section 8: State-Imposed Requirements

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

NA