

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

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

PART B - INDEPENDENT LIVING SERVICES

Part C - Centers for Independent Living

**State:
IDAHO**

**FISCAL YEARS:
2021 - 2023
Effective Date: October 1, 2020**

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Executive Summary

The 2021-2023 Idaho State Plan for Independent Living (SPIL) is our strategic plan that brings together the Network of Centers, the Idaho State Independent Living Council (SILC) and our partners as we work collaboratively to advance the independence of people across disabilities and lifespan. The mission of the IL Network and our partners, as seen through the lens of the State Plan is --

To advocate for and enhance the ability of all Idahoans with disabilities to live independently, direct their lives and participate fully in their community of choice.

While each partner in the plan has their own organizational strategic plan, the SPIL brings us together as a unified force to improve the quality of life for, and amplify the voices of, all Idahoans with disabilities from our cities to our most rural communities.

Toward our mission, the partners have identified the following goals:

1. The Idaho IL Network will promote and advocate for the integration, inclusion and equity of all Idahoans with disabilities across communities, lifespan and cultures.
2. The Idaho IL Network will work to strengthen effective Network operations that are adequately funded and increase capacity.
3. Idahoans with disabilities receive the community-based supports they need to live in their community of choice with greater independence.

The mission, goals identified, and the objectives outlined in the 2021-23 Plan represent the culmination of work that began in 2017 to address much needed funding reallocations across the IL Network, that includes our partners the Idaho Commission for Blind and Vision Impaired (ICBVI), and the SILC resource plan. Prior funding distribution was based on outdated demographics and did nothing to address funding inequities that resulted from Part C allocations. There was agreement that funding inequities in both Part C and Part B would be addressed in the next SPIL. The process to reach reallocation of Part B was difficult. However, we began from the unified position that the new Plan should address the statewide needs of Idahoan's across disabilities and lifespan; and that all partners would work toward greater participation in the upcoming statewide assessment planned for the fall of 2018. The following year included more than 20 development team

meetings, all held in accordance with Idaho's Public Meeting laws and held in accessible locations with ASL interpreters.

The statewide assessment was conducted over 60 days in the fall of 2018. The SILC, in coordination with the three Centers, conducted 17 community meetings. We heard from 270 people in meetings held across Idaho, including urban, rural and frontier areas, including a meeting in Spanish. We also met with students in three transition high schools, including one on the Nez Perce Reservation. Electronic surveys were posted in English and Spanish on the SILC and Center websites with hard copy and Braille available on request. SILC and Center staff helped many survey participants complete hard copy surveys that were also disseminated in large print and braille for a combined total of 320 completed surveys. Areas of greatest need were consistent across the state: affordable, accessible, safe housing; private and public transportation; healthcare, including mental healthcare; and community access and public safety.

Given the work already completed, all parties agreed to amend and extend the 2017-19 SPIL for substantial and material changes in FFY2020 when the Administration on Community Living (ACL) presented the opportunity in October of 2018. The resulting 2020 SPIL extension coupled with ongoing quarterly reporting and development provided an efficient and effective bridge to the 2021-23 Plan contained in the following pages.

As partners - the Network of Centers, the Idaho SILC and the Idaho Commission for the Blind and Visually Impaired - are committed to making Idaho a better place for all Idahoans with disabilities through advocacy, peer to peer support, independent living services and collaboration across disabilities and lifespan.

A draft of the Plan contained herein was reviewed and approved for the publicly posted comment period during a special public Council meeting on May 15, 2020. The Plan was posted to the SILC and CIL websites, and shared widely via CIL, SILC and partner email lists on May 18. An additional public hearing was held on June 4 to review any concerns, questions or receive further public input. The public comment period closed June 16, 2020. One public comment was received requesting that the SILC initiate an Idaho ABLE Savings account program. While the Plan does include the provision of technical assistance be provided by the SILC related to ABLE savings, it is not within the purview of the Idaho SILC to determine legislative priorities for the state of Idaho.

All elements of this State Plan for Independent Living are aligned with the stated purpose of the Independent Living Program as defined in Title VII of the Rehabilitation Act (1973), as amended.

Section 1: Goals, Objectives and Activities

1.1 Mission:

Mission of the Independent Living Network and the SPIL.

To advocate for and enhance the ability of Idahoans with disabilities to live more independently, direct their lives, and participate fully in their community of choice.

1.2 Goals:

Goals of the IL Network for the three-year period of the plan.

- Goal 1: The Idaho IL Network will promote and advocate for the integration, inclusion and equity of all Idahoans with disabilities across communities, lifespan and cultures.
- Goal 2: The Idaho IL Network will work to strengthen effective Network operations that are adequately funded and increase capacity.
- Goal 3: Idahoans with disabilities receive the community-based supports they need to live in their community of choice with greater independence.

1.3 Objectives

Objectives for the three-year period of the plan – including geographic scope, desired outcomes, target dates, and indicators. Including compatibility with the purpose of Title VII, Chapter 1.

- GOAL 1:** The Idaho IL Network will promote and advocate for the integration, inclusion and equity of all Idahoans with disabilities across communities, lifespan and cultures.

Objectives 1.1: State and local emergency officials include individuals with disabilities and address their unique needs in emergency planning: mitigation, preparation, response and recovery.

Purpose: 1.1a. The IL Network, including the SILC and ICBVI, and community members with disabilities will engage in advocacy efforts that reduce the barriers that individuals with significant disabilities encounter during local, statewide and national disasters and emergencies. Efforts will focus on local Emergency Managers, Volunteer Organizations Active in Disaster (VOAD), the Idaho Office of Emergency Management (IOEM), the Division of Public Health and other state and local entities that may impact lifesaving access for people with disabilities before, during and after an emergency.

1.1.b. We have determined the most effective way to accomplish inclusion at all stages of disaster is to forge relationships and understanding with the organizations above prior to an emergency through shared concerns and advocacy.

Further, as we educate and support Idahoans with disabilities about the importance of individual and community emergency planning, people with disabilities are better prepared; and increasingly advocate for, and are included in, all phases of emergency management.

Benchmarks/Indicators:

1.1.a. Continue and increase participation with emergency management groups and in emergency activities that lead to the full inclusion of people with disabilities in all stages of emergency/disaster: Increase the number of people with disabilities involved with emergency planning by 25% annually. Baseline: 9 people – Survey participants quarterly, requesting information about the value of participation, barriers addressed, successes and lessons learned.

1.1.b. Educate and support Idahoans with disabilities in making personal emergency plans and the importance of local involvement in planning. Collect and evaluate surveys from 60% of people trained in Emergency Preparedness, demonstrating that they have or plan to complete a personal emergency plan; and would like to connect to statewide or local emergency planning.

Timeline: October 1, 2020 – September 30, 2023

Geographic Scope: Statewide

Data Collection Process:

1.1.a. Survey will request information about barriers addressed, successes and lessons learned. Quarterly SPIL - Progress is collected by the SILC planning committee and reviewed quarterly by the Council for effectiveness and potential revision.

1.1.b. Training surveys collected and compiled after each workshop or individual training opportunity and reported by each participating Center, the SILC and ICBVI quarterly Via SPIL survey. Quarterly SPIL - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision.

Objective 1.2: The IL Network will represent the voice of individuals with disabilities in improving the availability of housing, transportation, health care and community access.

Purpose: The Idaho Network of Centers, the SILC and ICBVI, will advocate with private and public policy makers at the state and local level to reduce

barriers faced by people with disabilities in their communities. Primary areas of focus are housing, transportation, health care and community access. However, other issues may be addressed as they arise in specific communities. Areas of focus were initially determined based on extensive statewide assessment process and ongoing discussions during quarterly public meetings of the Council. The above partners will work together in collaboration with other local and statewide organizations who work to improve housing outcomes, healthcare, transportation and community access not only for people with disabilities, but also for the community at large, understanding that we're all stronger together as we work toward true inclusion in our communities. Through collaboration and shared experience, we will be better positioned to address barriers and improve community access.

Benchmarks/Indicators: For each year of the Plan, staff from each Center, the SILC and ICBVI will participate in a minimum of three boards, councils or policy workgroups addressing barriers to inclusion of people with disabilities in their community. Survey will request information about barriers addressed, successes and lessons learned. Annually, 25% of the surveys will indicate that barriers were reduced, or access was improved through advocacy/education efforts.

Timeline: October 1, 2020 – September 30, 2023

Geographic Scope: Statewide

Data Collection Process: Quarterly SPIL survey - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision.

Objective 1.3: The Idaho SILC, the Network of Centers, ICBVI, and the DSE will promote financial independence, including ABLE and other savings programs, and health care options, including the Medicaid for Workers with Disabilities program, by providing information and education to Idahoans with disabilities, service providers and community organizations.

Purpose: Increase financial literacy among people with disabilities and their families by reducing barriers to financial knowledge, savings programs, home and community-based services that increase independence, and work opportunities through education about programs available

Benchmarks/Indicators: Collect and evaluate surveys from 40% of people trained or provided individual technical assistance in areas of financial independence, demonstrating 20% of those surveyed have or plan to take additional steps furthering their financial independence.

Timeline: October 1, 2020 – September 30, 2023

Geographic Scope: Statewide
Data Collection Process: Surveys collected and compiled after each workshop or individual training/technical assistance opportunity and reported quarterly Via SPIL survey. Quarterly SPIL survey - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision.

Goal 2: The Idaho IL Network will work to strengthen effective Network operations that are adequately funded and increases capacity.

Objective 2.1 – Years 1 and 2: Address Part C funding inequities, Years 1 and 2 Note: Objective 2.2 Years 1-3 is the first phase of what will likely go into the 2024 -2026 SPIL and possibly beyond in a different form, dependent on Reauthorization of the Rehabilitation Act of 1973, as amended.
Purpose: To determine a formula for equitable distribution of Part C (as it exists today) across Idaho’s three Centers: Living Independence Network Corporation (LINC), Living Independently for Everyone (LIFE) and Disability Action Center-Northwest (DAC-NW). The purpose of a final document (year 3) is to provide written recommendations to policy makers during negotiations for the next reauthorization of the Rehabilitation Act of 1973, as amended. Each Center is housed in distinctly different geographic areas, each with its own unique geographic and meteorological barriers, including mountains, river canyons, deserts, and vastly variable weather conditions that present challenges for CILs to reach people who need services and visa-versa. Further, significant changes to population centers, including exponential growth in our urban areas have rendered the original Part C distribution obsolete.
Benchmarks/Indicators: The CIL Directors will meet at least quarterly over the next three years to determine and agree upon Part C funding formula for Idaho. The Directors will provide an annual written progress report to their boards and the SILC due October 31, 2021 and October 31, 2022.
Timeline: October 1, 2020 – September 30, 2022
Geographic Scope: Statewide
Data Collection Process: Quarterly SPIL survey - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision. Annual progress reports submitted to CIL Boards and the SILC, due October 31, 2021 and October 31, 2022.

Objective 2.2 - Year 3: Address Part C funding inequities

Note: Objective 2.2 Years 1-3 is the first phase of what will likely go into the 2024 -2026 SPIL and possibly beyond in a different form, dependent on Reauthorization of the Rehabilitation Act of 1973, as amended.

Purpose: To finalize a formula and written report for equitable distribution of Part C across Idaho’s three Centers: Living Independence Network Corporation (LINC), Living Independently for Everyone (LIFE) and Disability Action Center-Northwest (DAC-NW). The purpose of a final document (year 3) is to provide written to recommendations to policy makers during negotiations for the next reauthorization of the Rehabilitation Act of 1973, as amended.

Each Center is housed in distinctly different geographic areas, each with its own unique geographic and meteorological barriers, including mountains, river canyons, deserts, and vastly variable weather conditions that present challenges for CILs to reach people who need services and visa-versa. Further, significant changes to population centers, including exponential growth in our urban areas have rendered the original Part C distribution obsolete.

Benchmarks/Indicators: The CIL Directors will continue to meet at least quarterly to agree upon and finalize a Part C funding formula for Idaho. The Directors will provide a final report including recommendations by October 31, 2023.

Timeline: October 1, 2022 – September 30, 2023

Geographic Scope: Statewide

Data Collection Process: Quarterly SPIL survey - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision. Final report submitted to CIL Boards and the SILC, due October 31, 2023.

Objective 2.3: The three Idaho Centers: Living Independence Network Corporation (LINC), Living Independently for Everyone (LIFE and Disability Action Center-Northwest (DAC-NW) and the Idaho Commission for the Blind and Visually Impaired (ICBVI) will collaborate and work to identify other resource development options to enhance providing independent living services to the citizens of Idaho.

Purpose: The Network of Centers is stronger when we work with community and agency partners to improve and increase access to programs and resources that help Idahoans with disabilities live more independently in their community of choice, by working together collaboratively we will be able to enhance services for all Idahoans with disabilities.

Benchmarks/Indicators: Agencies will meet at least once per quarter for all three years resulting in one new funding stream annually for a minimum on one agency.
Timeline: October 1, 2020 – September 30, 2023
Geographic Scope: Statewide
Data Collection Process: Quarterly SPIL survey - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision.

Goal 3: Idahoans with disabilities receive the community-based supports they need to live in their community of choice with greater independence.

Objective 3.1: Provide Independent Living services to people with disabilities to increase community access in rural areas and/or unserved and underserved populations identified in section 3.2.
Purpose: The Network of Centers and ICBVI will increase IL services and supports for Idahoans with disabilities who live in rural areas and/or are part of locally identified unserved/underserved communities; that they may be included and fully participate in their community of choice through means that are appropriate within their culture.
Benchmarks/Indicators: Each Center and ICBVI will provide services in at least one unserved/underserved area and/or to at least one member of an identified population (may be living in an urban area), per quarter demonstrating greater access, inclusion, independence and/or peer connections in previously unserved/underserved communities.
Timeline: October 1, 2021 – September 30, 2023
Geographic Scope: Statewide
Data Collection Process: Quarterly SPIL survey - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision.

Objective 3.2: The Idaho SILC, Network of Centers and ICBVI will expand cultural competence by participating in events, listening and learning about community specific concerns/issues, to/with unserved/underserved populations. See Section 3.2 definitions.
Purpose: We cannot hope to build trust and understanding without first increasing our own cultural and linguistic competence. The primary purpose is to listen and learn, not to share information about what an agency or organization

has to “help” people within a given community. SILC, Network of Centers and ICBVI staff will learn through engagement in events held by locally identified marginalized communities. Dependent on resources, organizations may provide event sponsorships. However, such sponsorships do not replace actual staff participation in events and should not distract from intentional learning, i.e.: tabling at an event is meant to tell people what “X” agency can do for the people attending the event. Active listening and learning mean that I hear what the community needs and wants before I attempt to offer anything. Information learned and shared through quarterly review of surveys will help better inform outreach and services to identified communities. Over time, areas of need may be identified for further assessment informing the 2024-26 SPIL.

Benchmarks/Indicators: Each Center, the SILC and ICBVI will participate in a minimum of two events annually held by locally identified marginalized communities. Through the survey, staff will share community visited, what they learned, community strengths, how their perspective may have changed and how they might better serve the community visited. Annually, 10% of the surveys will indicate lasting connections were made with the potential to serve, otherwise unserved populations.

Timeline: October 1, 2020 – September 30, 2023

Geographic Scope: Statewide

Data Collection Process: Quarterly SPIL survey - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision.

Objective 3.3: Increase demonstrable community connections by the number of, and participation in, community cross disability peer to peer mentoring and learning groups.

Purpose: To create and enhance meaningful web-based and in-person opportunities for people across disabilities and lifespan to connect with and learn from each other; and identify, develop and support emerging disability leaders. The Centers and ICBVI will work together to develop a brief, uniform survey to determine effectiveness and refine strategies for supporting groups and education in their regions.

Benchmarks/Indicators: Each Center and ICBVI will stand up and support at least one peer to peer or IL learning (workshop) opportunity monthly either in-person or via web-based technology. The Centers and ICBVI will provide surveys for completion after meetings/workshops with the goal of 50% of participants completing a survey and at least 40% of those indicating they learned something new about Independent Living, disability issues and/or made

meaningful peer connections.
Timeline: October 1, 2020 – September 30, 2023
Geographic Scope: Statewide
Data Collection Process: The Centers and ICBVI will disseminate, collect and compile information from local surveys to share strategies, lessons learned best practices and anecdotal information on completion of quarterly SPIL surveys. Quarterly SPIL survey - Progress is collected by the SILC planning committee and reviewed quarterly by the SILC for effectiveness and potential revision.

1.4 Evaluation

Methods and processes the SILC will use to evaluate the effectiveness of the SPIL including timelines and evaluation of satisfaction of individuals with disabilities.

Prior to quarterly public meetings, the SILC planning committee sends out two surveys: one to Council members, and another to SILC staff, CIL Directors, CIL representatives who are appointed to the Council and other subrecipients and SPIL partners. CIL, SILC and ICBVI Directors or their designees are ultimately responsible for completion of quarterly surveys. Surveys collect information regarding progress, barriers, lessons learned and reporting. The SILC and ICBVI are Part B subrecipients and as such, are held to the same quarterly and annual reporting requirements as the Network of Centers.

The planning committee compiles responses and presents a report, including the data, to the Council during the quarterly public meetings (January, April, July, October). The planning committee shares successes and alerts the Council to potential issues, barriers or other concerns that may require additional focus or alteration of the SPIL. The committee leads the Council through discussions, sharing ideas and local feedback from their communities to address issues during the quarterly or additional public meetings. The full Council makes recommendations regarding the need for additional data and possible public forums to gather more information.

The SILC Executive Director at the direction and in coordination with the Council Chair and other members of the Executive/Finance Committee, provides quarterly reports in addition to an annual state report, based on the state fiscal year (SFY July 1 – June 30). The SILC Executive Director works with the DSE, Network of Centers and ICBVI to complete the annual Part B Program Progress Report (PPR) based on the federal fiscal year (FFY). The Executive Director uses the quarterly compiled data and internal tracking to report SILC staff activities at the end of the

SFY and FFY. Reports include accomplishments, lessons, challenges, changes and progress toward the achievement of identified goals and objectives. Annual reports are provided during the October and January quarterly meetings and are publicly posted.

1.5 Financial Plan

Sources, uses of, and efforts to coordinate funding to be used to accomplish the Goals and Objectives. Process for grants/contracts, selection of grantees, and distribution of funds to facilitate effective operations and provision of services.

Fiscal Year(s): 2021					
Sources	Projected Funding Amounts and Uses				
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Administrative costs (applies only to Part B funding)
Title VII Funds					
Chapter 1, Part B (including state match)	101,615	91,454	113,830	31,818	0
Chapter 1, Part C			947,004		
Other Federal Funds		225,000 (OIB)			
Sec. 101(a)(18) of the Act (Innovation and Expansion)	99,500				
Social Security Reimbursement					
CAREs Act CILs - FFY 2021 estimated balance			350,000 – DAC 100,000 - LINC 122,503 - LIFE		
Other					
Non-Federal Funds					
State Funds	135,480	35,162	100,000	90,480	
Other					

Fiscal Year(s): 2022					
Sources	Projected Funding Amounts and Uses				
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Administrative costs (applies only to Part B funding)
Title VII Funds					
Chapter 1, Part B (including state match)	101,615	81,292	123,992	31,818	0
Chapter 1, Part C			947,004		
Other Federal Funds		225,000 (OIB)			
Sec. 101(a)(18) of the Act (Innovation and Expansion)	99,500				
Social Security Reimbursement					
Other					
Non-Federal Funds					
State Funds	135,720	34,034	100,000	90,480	
Other					

Fiscal Year(s): 2023					
Sources	Projected Funding Amounts and Uses				
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Administrative costs (applies only to Part B funding)
Title VII Funds					
Chapter 1, Part B (including state match)	101,615	71,130	134,154	31,818	0
Chapter 1, Part C			947,004		
Other Federal Funds		225,000 (OIB)			
Sec. 101(a)(18) of the Act (Innovation and Expansion)	99,500				
Social Security Reimbursement					
Other					
Non-Federal Funds					
State Funds	135,720	32,904	100,000	90,480	
Other					

Description of financial plan narrative.

As stated earlier, Idaho's financial plan for the 2021-23 SPIL is the culmination of more than three-years' work to more equitably distribute Part B funding to the Network of Centers while continuing to support the statewide IL work that's carried out by ICBVI and the SILC resource plan. In 2020, ICBVI Part B funding was reduced by 15%; and SILC Part B funding was reduced by 9%. The 2021-23 SPIL continues to address funding reallocation from ICBVI in the amount of 3% annually and redirects it to the two underfunded Centers, LIFE and LINC in a 50/50 split. Through on-going discussions that included the DSE and the SILC, and informed by the statewide needs assessment, the Network of Centers and ICBVI have agreed to collaborate to ensure that Idahoans who are Blind or have low vision maintain independence in their homes. ICBVI is a Part B subrecipient and IL partner. ICBVI is not a signer on the SPIL because they are not a Center for Independent Living. The CILs, ICBVI and the SILC, as Part B subrecipients, have all agreed to participate in quarterly reporting. Additionally, because ICBVI's Part B funding directly supports statewide IL services, they will continue to work with the SILC and the DSE to complete portions of the annual Program Progress Report (PPR).

The Idaho Commission for the Blind and Vision Impaired (ICBVI)
341 W. Washington St.
PO Box 83720
Boise, ID 83720-0012
208-334-3220
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ICBVI serves all 44 counties in Idaho. ICBVI's main office is in Boise with field offices in south eastern Idaho - Idaho Falls, Pocatello; northern Idaho, Coeur d'Alene, Lewiston; and in south central Idaho, Twin Falls.

Oversight: Chapter II, OIB – Rehabilitation Services Administration
process
Part B -- DSE, see section 4.3 oversight process for Part B
funds

The plan further works to compensate for Part C funding which is largely distributed to DAC-NW, the Center serving the fewest counties, and no urban areas, yet receives nearly double that of the two other Centers, LINC and LIFE. LINC and LIFE are located in a larger combined geographical area, one of which, LINC, serves the state's metro areas, combined with rural and frontier regions.

However, even when combined, the two Centers receive less Part C funding than DAC-NW. DAC-NW serves a large, rural and frontier region of the state, and currently receives Part C funding that is much closer the \$570,000 needed to adequately fund a Center. While Part B reallocation cannot fully compensate for Idaho’s Part C disparities, all parties have agreed to work toward that end through means currently available with Part B funds.

The table below illustrates the agreed upon redistribution of Part B for the 2021-23 Idaho State Plan for Independent Living

Subrecipient	FY2021 amount	FY2022 amount	FY2023 amount
DAC-NW	5%	5%	5%
LINC	21.5%	23%	24.5%
LIFE	16.5%	18%	19.5%
SILC	30%	30%	30%
ICBVI	27%	24%	21%

The anticipated total Chapter 1, Part B federal appropriation for each year of the three-year Plan cycle is \$338,717 with a non-federal match of \$37,637. Subgrantees are responsible for meeting the match for their portion of Part B funding.

Part B funds in the Other SPIL Activities column are to support collaborative activities of all three CILs and other partners that cross Part C service boundaries to affect the whole state. The production and distribution of a the statewide/regional newsletter and the planning and implementation of an annual statewide IL conference is supported by Part B funding that is contributed through each CIL. The entire allocation of Part B funding designated for Disability Action Center – NW, less 10% Indirect, is dedicated to these activities, with Part B funds from the other CILs making up the difference. While small percentage adjustments in Part B distribution occur over the three years as indicated in the information below, the anticipated dollar amount dedicated to Other SPIL Activities remains consistent.

The Idaho SILC is appropriated state general funds annually. The 2021 (SFY: July 1-June 30) appropriation is for \$226,200 as indicated in table 1.5. This amount is used in each FFY table. We have experienced reductions to our current and coming state general fund budget as a consequence of the COVID 19 emergency. We anticipate more significant reductions in the coming year due to the recent economic downturn. The SILC allocates approximately 40% (\$90,480) in state general funds directly toward Other SPIL Activities. These activities are primarily dedicated to emergency preparation, mitigation and recovery activities, including

education. Activities also include financial literacy technical assistance and limited youth activities. The remaining 60% (\$135,720) of state general funds is directed toward the SILC resource plan.

FFY 2021:

Chapter 1 Part B funds \$101,615 and \$11,291 non-federal state funds will be used to fund the resource plan for the Idaho State Independent Living Council (SILC).

Chapter 1 Part B \$91,454 and \$10,162 non-federal state funds will be used to fund the state independent living services through the Idaho Commission for the Blind and Visually Impaired (ICBVI), and Chapter 2 \$225,000 and \$25,000 non-federal match will be used to fund older blind programs.

Chapter 1 Part B \$72,824 and \$8,092 non-federal funds will be used to fund the general operations of Living Independence Network Corporation (LINC) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part B \$16,936 and \$1,882 non-federal funds will be used to fund SPIL activities of Disability Action Center-Northwest (DACNW) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part B \$55,888 and \$6,210 non-federal funds will be used to fund IL Services, SPIL activities and the general operations of Living Independently for Everyone (LIFE) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part C \$947,004 will fund the state network of centers for independent living: LINC, DAC-NW and LIFE.

A line for CAREs Act award has been added to table 1.5 for FFY2021 with estimated amounts (total state beginning balance, April 2020 was \$941,295).

- Disability Action Center – NW received \$442,450 in CAREs Act funding and will have approximately \$350,000 available from October 1, 2020 - September 30, 2021.
- LINC received \$199,475 and will have approximately \$100,000 available from October 1, 2020 – September 30, 2021.
- LIFE received \$299,370 and will have approximately \$122,503 available from October 1, 2020 - September 30, 2021.

FFY 2022:

Chapter 1 Part B funds \$101,615 and \$11,291 non-federal state funds will be used to fund the resource plan for the Idaho State Independent Living Council (SILC).

Chapter 1 Part B \$81,292 and \$9,034 non-federal state funds will be used to fund the state independent living services through the Idaho Commission for the Blind and Visually Impaired (ICBVI), and Chapter 2 \$225,000 and \$25,000 non-federal match will be used to fund older blind programs.

Chapter 1 Part B \$77,905 and \$8,656 non-federal funds will be used to fund the general operations of Living Independence Network Corporation (LINC) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part B \$16,936 and \$1,882 non-federal funds will be used to fund SPIL Activities of Disability Action Center-Northwest (DACNW) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part B \$60,969 and \$6,774 non-federal funds will be used to fund IL Services, SPIL activities and the general operations of Living Independently for Everyone (LIFE) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part C \$947,004 will fund the state network of centers for independent living: LINC, DAC-NW and LIFE.

FFY 2023:

Chapter 1 Part B funds \$101,615 and \$11,291 non-federal state funds will be used to fund the resource plan for the Idaho State Independent Living Council (SILC).

Chapter 1 Part B \$71,130 and \$7,904 non-federal state funds will be used to fund the state independent living services through the Idaho Commission for the Blind and Visually Impaired (ICBVI), and Chapter 2 \$225,000 and \$25,000 non-federal match will be used to fund older blind programs.

Chapter 1 Part B \$82,986 and \$9,221 non-federal funds will be used to fund the general operations of Living Independence Network Corporation (LINC) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part B \$16,936 and \$1,882 non-federal funds will be used to fund SPIL

activities of Disability Action Center-Northwest (DACNW) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part B \$66,050 and \$7,339 non-federal funds will be used to fund IL Services, SPIL activities and the general operations of Living Independently for Everyone (LIFE) through a contract with the Idaho Division of Vocational Rehabilitation (IDVR).

Chapter 1 Part C \$947,004 will fund the state network of centers for independent living: LINC, DAC-NW and LIFE.

Section 2: Scope, Extent, and Arrangements of Services

2.1 Services

Services to be provided to persons with disabilities that promote full access to community life including geographic scope, determination of eligibility and state-wideness.

Table 2.1A: Independent living services	Provided using Part B (check to indicate yes)	Provided using other funds (check to indicate yes; do not list the other funds)	Entity that provides (specify CIL, DSE, or the other entity)
Core Independent Living Services, as follows:			
- Information and referral	X	X	LIFE, LINC, DAC-NW, ICBVI
- IL skills training			
- Peer counseling	X	X	LIFE, LINC, DAC-NW, ICBVI
- Individual and systems advocacy			
- Transition services including:			
▪ Transition from nursing homes & other institutions	X	X	LIFE, LINC, DAC-NW, ICBVI
▪ Diversion from institutions			
▪ Transition of youth (who were eligible for an IEP) to post-secondary life	X	X	LIFE, LINC, DAC-NW, ICBVI
Counseling services, including psychological, psychotherapeutic, and related services	X	X	DSE, ICBVI

Table 2.1A: Independent living services	Provided using Part B (check to indicate yes)	Provided using other funds (check to indicate yes; do not list the other funds)	Entity that provides (specify CIL, DSE, or the other entity)
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 disabilities) Note: CILs are not allowed to own or operate housing.	X	X	LIFE, LINC, DAC-NW, ICBVI
Rehabilitation technology	X	X	LIFE, LINC, DAC-NW, DSE, ICBVI
Mobility training	X	X	LIFE, LINC, DAC-NW, ICBVI
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	X	X	LIFE, LINC, DAC-NW, DSE, ICBVI
Personal assistance services, including attendant care and the training of personnel providing such services	X	X	LIFE, LINC, DAC-NW, ICBVI
Surveys, directories, and other activities to identify appropriate housing, recreation opportunities, and accessible transportation, and other support services	X	X	LIFE, LINC, DAC-NW, SILC, ICBVI
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	LIFE, LINC, DAC-NW, SILC, ICBVI
Education and training necessary for living in the community and participating in community activities	X	X	LIFE, LINC, DAC-NW, ICBVI
Supported living	X	X	LIFE, LINC, DAC-NW, ICBVI

Table 2.1A: Independent living services	Provided using Part B (check to indicate yes)	Provided using other funds (check to indicate yes; do not list the other funds)	Entity that provides (specify CIL, DSE, or the other entity)
Transportation, including referral and assistance for such transportation	X	X	LIFE, LINC, DAC-NW, DSE, ICBVI
Physical rehabilitation		X	DSE
Therapeutic treatment		X	DSE
Provision of needed prostheses and other appliances and devices		X	DSE
Individual and group social and recreational services	X	X	LIFE, LINC, DAC-NW, ICBVI
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	LIFE, LINC, DAC-NW, SILC, DSE, ICBVI
Services for children	X	X	LIFE, ICBVI
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 disabilities	X	X	LIFE, LINC, DAC-NW, ICBVI
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	X	X	LIFE, LINC, DAC-NW, ICBVI
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	X	X	LIFE, LINC, DAC-NW, SILC, ICBVI
Such other services as may be necessary and not inconsistent with the Act	X	X	SILC, ICBVI

2.2 Outreach

Identify steps to be taken regarding statewide outreach to populations that are unserved or underserved by programs that are funded under Title VII, including minority groups and urban and rural populations.

See definitions of Served, Unserved and Underserved in Section 3.2

Idaho's three CILs and ICBVI are willing and eager to serve all 44 counties of Idaho. Due to the lack of financial resources, the CIL's are currently unable to serve all counties at the level desired. All three CIL's have not only underserved counties but underserved minority groups. With the appropriate funding levels, the CIL's would be able expand services to underserved minority groups as well as underserved counties.

Given the size, population and geographical landscape, counties and racial and ethnic minorities that aren't identified through Part C PPRs are indicated as unserved. Counties and/or target populations who receive one to three services, indicates that such county or population is underserved, sometimes dependent on location.

Idaho's population is rapidly growing, especially in our urban centers. Most recent US Census bureau data indicates that nearly 82% of the population is white, non-Hispanic or Latino. Nearly 13% are Hispanic or Latino, 2.5% identify as more than one race, 1.7% American Indian or Alaska Native and approximately 1% are black or African American. We know through collaboration with our partners who work directly with migrant workers, refugees and Native Americans that these populations face more significant incidence of disability and poor health outcomes.

Outreach focus and activity:

Statewide outreach targets counties and populations which have been unserved and underserved. Outreach activity has grown exponentially through the COVID-19 emergency. We anticipate that many of these efforts will carry through in the coming years as many have been or may be determined to be best practice. Activities may include, but are not limited to the following:

- Public service announcements and press releases through print, radio and television outlets about the services Centers provide, including contact information for Centers in their respective media market areas.
- Participation in Job, Health and Education Fairs in rural communities, through Tribal (Section 121) Vocational Rehabilitation Projects, Migrant Farm worker appreciation events, and Refugee and LGBTQ+ events.
- Hosting ADA celebrations regionally.
- Participation in and co-sponsorship of Disability Advocacy Day held during legislative sessions.

- Hosting web-based and in person IL conferences, peer support, emergency planning, and other workshops.
- Visiting high schools, including alternative high schools and connecting with out of school youth living in rural and frontier areas.

2.3 Coordination

Plans for coordination of services and cooperation among programs and organizations that support community life for persons with disabilities.

Coordination of services and activities ensures support for integration and inclusion of people with disabilities in our communities. As Idaho's Part B subrecipients, the Network of Centers, SILC and ICBVI work with the DSE to coordinate and complement services avoiding unnecessary duplication of programs. Idaho Part B subrecipients often coordinate with the following state agencies, public and private entities and non-profits among others:

- Idaho Center on Disabilities and Human Development
- Idaho Commission on Aging
- Idaho Council for the Deaf and Hard of Hearing
- Idaho Council on Developmental Disabilities
- Idaho Department of Health and Welfare
- Idaho Department of Labor
- Idaho Office of Emergency Management and county emergency managers
- Intermountain Fair Housing Council
- Public Health Entities
- State Department of Education
- State Protection and Advocacy System (which includes the Client Assistance Program)
- Veteran's Administration
- Volunteer Organizations Active in Disaster (VOAD)
- Other federal, state and local agencies and non-profits addressing issues such as housing, education, transportation, healthcare, emergency management and Veterans' programs.

Section 3: Network of Centers

3.1 Existing Centers

Current Centers for Independent Living including: legal name; geographic area and counties served; and source(s) of funding. Oversight process, by source of funds (e.g., Part B, Part C, state funds, etc.) and oversight entity.

1. Disability Action Center - Northwest (DAC-NW)

505 N. Main Street
Moscow, ID 83843
208-883-0523
<http://dacnw.org>

DAC-NW serves Benewah, Boundary, Bonner, Clearwater, Idaho, Kootenai, Latah, Lewis, Nez Perce and Shoshone, counties and includes three of five Idaho Native American Indian Reservations. This service area covers over 21,000 square miles. DAC-NW's main office is in Moscow with two field offices: one in Post Falls to the north and one in Lewiston to the south. DAC-NW also provides services in up to three underserved eastern Washington counties. DAC-NW is recognized in the Washington SPIL, serving three counties: Asotin, Garfield and Whitman. DAC-NW does not use Idaho Part B or other state dedicated funds to meet their Washington responsibilities.

SPIL Signatory

Funding Sources: Part C, Part B, CARES Act

Oversight: Part C -- Administration for Community Living process
Part B --DSE, see section 4.3 oversight process for Part B funds
CARES Act – Administration for Community Living process

2. Living Independently For Everyone (LIFE)

460 Pershing Avenue, Suite A
Pocatello, ID 83201
208-232-2747
<https://www.idlife.org>

LIFE serves Bannock, Bear Lake, Bingham, Bonneville, Butte, Caribou, Cassia, Clark, Custer, Franklin, Fremont, Jefferson, Lemhi, Madison, Minidoka, Oneida, Power, and Teton counties, and includes the Fort Hall Reservation. This service area covers nearly 30,000 square miles. LIFE's main office is in Pocatello with field offices in Idaho Falls, Burley and Blackfoot.

SPIL Signatory

Funding Sources: Part C, Part B, CARES Act

Oversight: Part C -- Administration for Community Living process

Part B -- DSE, see section 4.3 oversight process for Part B funds
CARES Act – Administration for Community Living process

3. Living Independence Network Corporation (LINC)
1878 W Overland Rd
Boise, ID 83705
208-336-3335
<https://lincidaho.org>

LINC serves Ada, Adams, Blaine, Boise, Camas, Canyon, Elmore, Gem, Gooding, Jerome, Lincoln, Owyhee, Payette, Twin Falls, Valley and Washington counties, and includes a large portion of the Duck Valley Reservation. This service area includes nearly 9,000 square miles. LINC’s main office is in Boise with field offices in Twin Falls and Caldwell.

SPIL Signatory

Funding Sources: Part C, Part B, CARES Act

Oversight: Part C -- Administration for Community Living process
Part B -- DSE, see section 4.3 oversight process for Part B funds
CARES Act – Administration for Community Living process

The three Idaho CILs named above are recipients of Title VII, Part C funds, providing services to all 44 counties of Idaho. There are no other CILs in Idaho. LINC, DAC-NW and LIFE are community-based, cross-disability, nonprofits, run by a majority of individuals with a disability and managed by a board that is made up of a majority of people with a significant disability, make up the CIL Network in Idaho. These entities meet the minimum requirements to join the Idaho SILC in creating and being signatories to the Idaho SPIL.

3.2 Expansion and Adjustment of Network

Plan and priorities for use of funds, by funding source, including Part B funds, Part C funds, State funds, and other funds, whether current, increased, or one-time funding and methodology for distribution of funds. Use of funds to build capacity of existing Centers, establish new Centers, and/or increase statewideness of Network.

The following definitions are established with regard to Network of Centers and IL Network partner services within this SPIL:

- Served: - Service area and all populations of individuals with disabilities have full access to a CIL.
- Unserved: - A county or area is not served by a CIL.
- Marginalized populations not served by a CIL
- Underserved: - The region is within the service area of a CIL, however, individuals with disabilities do not have easy access to the CIL due to the size/geography of the service area.
- Identified marginalized populations are often unaware of CIL services, even in areas otherwise well served: such populations include but are not limited to refugees (primarily urban), migrant workers (urban, rural and frontier), Native Americans (primarily rural and frontier) and rural LGBTQ+ youth.

The three CILs strive to increase Independent Living services to all Idahoans with disabilities. This is currently unattainable as there is insufficient and unequitable funding to all three Centers who cover predominately rural communities. Our goal with additional funding would be to achieve that all Idahoans with disabilities have reasonable and timely access to a Center and the services they provide.

Minimum funding level for a Center and formula/plan for distribution of funds to bring each Center to the minimum. Exceptions must be explained with sufficient detail.

There are currently two funding sources to support each CIL in Idaho with direct relation to Independent Living: Title VII, Part C and Title VII, Part B. Each Center follows federal guidance and work to achieve other funding sources outside of federal funds to support operations. Additional programs require additional operating expense funds, so a minimal amount of funds from other funding source meet the level of need for the Independent Living programs.

Due to COVID-19 all three CIL's have received funding under the CARES Act for part of FY2020-FY2021. With this funding, the CIL's will allocate resources in compliance with all current federal law, regulations and guidance from Health and Human Services (HHS) ACL. The activities that will be included are limited to staffing, statewide advertisement statewide, transportation, technology, providing supports to persons with disabilities to stay in their communities and out of facilities and mobilizing centers for rural outreach. All of these are in direct support of the SPIL and the IL core services as outlined by HHS ACL.

Idaho CILs may work collaboratively on issues that support Idahoans across established CIL service boundaries. COVID-19 funding may be utilized to support these identified activities.

DAC-NW CARES Act activities:

Throughout its service area of the ten northern Idaho and three Eastern Washington counties DAC-NW will focus CARES Act funding toward these primary need areas: acquisition of technology to reach people with a disability that are more isolated due to COVID-19 and to ensure CIL staff are equipped to connect with consumers remotely; significant outreach and advertising to make people aware of CIL supports and services and to provide distance education and training; increased outreach, education, and support including possible financial assistance to help people move from dangerous institutional setting to safer community settings of their choice; specific individual service support to address COVID-19 related transportation barriers that impact independence and/or access to services that support independence in family, home, community, and work; specific services that support individuals to avoid institutionalization including possible temporary housing support, provision of PPE, and all other IL services; advocacy and direct supports to improve remote access to Internet, phone, and other services necessary for remote access to services; and, support of innovative methods such as mobile presentation of services to reach people in the most rural areas.

DAC-NW intends to respond to COVID-19 related issues in collaboration with the other Idaho CILs and regional IL projects that may involve sharing costs outside of DAC-NW's service area to support maximum impact.

LIFE CARES Act Activities:

Throughout LIFE's service area of the eighteen counties in Eastern Idaho, LIFE will focus CARES Act funding toward these primary need areas: acquisition of durable medical equipment; assistive technology to help consumers stay connected; medical supplies for consumers and staff; equipment and furniture to support tele-work for IL staff; financial support for rent and utilities for consumers; adding additional staff; supplies to support additional staff; company vehicles to assist in expanding our services to our more rural communities; and other needs as identified and approved by ACL and LIFE Board of Directors.

LINC CARES Act Activities:

Throughout LINC's service area as outlined in the SPIL, LINC will focus CARES Act funding toward primary needs that have arisen in response to or been elevated due to the COVID-19 emergency for Idahoans with disabilities. These areas include, but are not limited to: access to appropriate and needed testing, medical supplies, equipment and software for increased tele-work, purchasing of assistive technology and durable medical equipment, financial support needed for rent and utilities for consumers, additional staffing needs to meet the increased needs and serve underserved communities, equipment and supplies to connect with rural communities, and other expenses and needs as identified and approved by ACL and LINC.

The following outlines the priorities for the utilization for new Title VII, Part C funding:

- To have equitable funding between all three centers that adequately support population and geographical area, the center Directors will meet quarterly for the next two years FFYs to discuss ongoing trends in their regions to assist in identifying the best funding solution that would ensure all Idahoans with disabilities have equal access to CIL services.
- Due to increased costs of living, salaries, benefits, operational costs and growing populations, each center at a minimum would require \$570,000 to continue to meet the need of consumers. The initial funding structure set forth when CIL's were originally funded is now obsolete and makes meeting the needs of Idahoans with disabilities increasingly difficult.

Action/process for distribution of funds relinquished or removed from a Center and/or if a Center closes.

In the event that a Center's funds are relinquished or removed:

- Funding would be distributed equitable 50/50 between the remaining CIL's, until such time funds are reinstated to the Center from where the funds originated.

In the event that a Center closes, the following would take place:

- The remaining CIL Directors and the SILC would identify what counties within the closed CIL's region could be temporarily supported by the operating CIL's; and funding would be dispersed accordingly. Due to geographical location, the application of the two remaining CIL's continuing may not be achievable and only one center would temporarily absorb the counties and funding.
- The funding would be accounted for separately and not added to a current CIL funding source for their current service area but in support of the originally funded counties. The Center Directors, in collaboration with the SILC, would work together to open another CIL to support the originally designated area.

Plan/formula for adjusting distribution of funds when cut/reduced.

Should current Part C funding be reduced, the three CIL Directors will meet and create an appropriate disbursement formula based on current information related to identified needs, funding allocations, geographical area and demographic data, and submit for approval to ACL, a plan that would appropriately fit the given situation. In the event that all centers have equitable Part C funding, all three Centers will take an equitable reduction.

Should Part B funding be reduced during the course of the plan, funds will be reduced by the percentage amount of the full grant year award provided in the Financial Plan, Section 1.5 for the FFY in which the change occurs. Such changes would similarly impact Part B recipients, the SILC and ICBVI.

Plan for changes to Center service areas and/or funding levels to accommodate expansion and/or adjustment of the Network.

There are currently no changes planned for service areas. Idaho has been working for more than three years on a plan to reallocate Part B funds away from DAC-NW, ICBVI and the SILC toward the two underfunded Centers. The current Plan provides for continued adjustment through reduction of 3% for ICBVI for each year to be split evenly between LINC and LIFE (see section 1.5). Any additional changes to CIL services and/or funding levels will be detailed and agreed upon by the SILC and CIL Directors in an approved SPIL amendment

Plan for one-time funding and/or temporary changes to Center service areas and/or funding levels.

Should any one-time funding streams be issued prior to a change in equitable funding, the three CIL Directors will meet and create an appropriate disbursement formula based on current information on needs, funding allocations and data, and submit a plan that would appropriately fit the environment and submit to ACL, at such time it is appropriate for approval. At any such time that funding becomes equitable the funding distribution would be split between the three Centers equitably. Any additional changes to CIL service area and/or funding levels will be detailed and agreed upon by the SILC and CIL Directors in an approved SPIL amendment.

Section 4: Designated State Entity

Idaho Division of Vocational Rehabilitation will serve as the entity in Idaho designated to receive, administer, and account for funds made available to the state under Title VII, Chapter 1, Part B of the Act on behalf of the State. (*Sec. 704(c)*)

4.1 DSE Responsibilities

- (1) receive, account for, and disburse funds received by the State under this chapter based on the plan;
- (2) provide administrative support services for a program under Part B, and a program under Part C in a case in which the program is administered by the State under section 723;
- (3) keep such records and afford such access to such records as the Administrator finds to be necessary with respect to the programs;
- (4) submit such additional information or provide such assurances as the Administrator may require with respect to the programs; and
- (5) retain not more than 5 percent of the funds received by the State for any fiscal year under Part B. for the performance of the services outlined in paragraphs (1) through (4).

4.2 Grant Process & Distribution of Funds

Grant processes, policies, and procedures to be followed by the DSE in the awarding of grants of Part B funds.

The Idaho Division of Vocational Rehabilitation (IDVR), Idaho's Designated State Entity (DSE), receives, accounts for, and disburses Federal Part B funds per the Notice of Award (NOA) from the Administration on Community Living (ACL).

As with all financial activities IDVR follows State of Idaho policies to receive, disburse, and document grant award funds. Idaho's State Plan for Independent Living (SPIL) has defined percentages that set the amount of funds that each agency will receive. Two State of Idaho agencies receive Federal IL Part B funds: the State Independent Living Council (SILC) and the Idaho Commission for the Blind and Visually Impaired (ICBVI); and three Centers for Independent Living (CILs): Disability Action Center-Northwest (DAC-NW); Living Independently for Everyone (LIFE); and Living Independence Network Corporation (LINC).

The DSE enters into agreements with the SILC, ICBVI and the CILs for the amounts defined in the approved SPIL and monitors the agreements and expenditures to ensure compliance with the SPIL. The DSE provides contract monitoring services for Part B funds. Funds are allocated in accordance with the SPIL, and contracts are issued at the beginning of the grant year. Funds are reimbursed in a timely manner upon submission of appropriate documentation agreed upon in the annual contract and in accordance with state payment policies.

Idaho's SPIL development process provides the means to solicit proposals, develop proposal formats, review proposals and it provides reviewers for the proposals. The SILC holds public quarterly meetings attended by the DSE and Council members to conduct official business of the SILC. Among its many business topics, the Council discusses proposals for participation in the IL grant funds and helps the agencies (SILC, ICBVI, DAC-NW, LIFE, LINC) define the needs of the independent living community and plan methods to deliver vital services. Creation of the agency proposals comes through statewide assessments, planning and discussion among the Network of Centers, Council members and other partners during public meetings, and review and approval of each agency's plan to deliver opportunities and knowledge for independent living. Through a rigorous planning process, the Network of Centers, SILC, other partners and the DSE discuss the funding allocations. The agreed upon SPIL is submitted to ACL with at least 51% of Center Directors and the SILC Chair signing on, and the DSE Administrator agrees to receive, administer, and account for funds made available to the state under Title VII, Chapter 1, Part B of the Act on behalf of the state. (Sec. 704(c)) and approve the percentage share that each agency will receive. Upon approval from ACL and receipt of the Part B Notice of Award (NoA), contracts are completed with each subrecipient.

Continuation Funding: IDVR has always met the grant's match requirements in the first year of the award and has thus qualified for an additional year of carryover to continue grant activities. In the event that some financial activities go into the carryover year and match has been met, the original contract values will continue and IDVR will issue time extensions. IDVR will apply all monitoring and payment procedures as usual while grant recipients finish providing IL grant activities and using the balance of their agreements.

When a new grant year starts IDVR will issue new contracts based on the SPIL. IDVR does not mix new grant funds with old funds but keeps them separate and accounts for them in their respective grants. It is possible to have two grants running at the same time; however, the accounting and tracking remains separate.

The DSE has indicated that it will not retain any portion of the 5% administration fee allowed under Section 704(c)(5) during the course of the 2021-23 SPIL. All Federal IL award funds will go to SILC, ICBVI and the CILs as defined in the SPIL.

4.3 Oversight Process for Part B Funds

The oversight process to be followed by the DSE.

The DSE has a designated Financial Specialist who reviews, evaluates and disperses Part B funds in accordance with individual contracts through established State of Idaho documentation and payment processes, and in compliance with Federal regulations. The DSE maintains and reviews financial data, prepares Federal cash draws and files required financial reports. The DSE also participates in preparation and review of program reports as needed.

The DSE does not provide administrative support for Part B to SILC, ICBVI or the CILs. The DSE's administrative support occurs only in the administration (receiving, accounting, disbursing) of the Part B grant funds to SILC, ICBVI and CILs.

The DSE maintains grant records and data by following State of Idaho policies and Federal regulations as they apply to financial activities and documentation. The DSE maintains the records according to retention policies set by the State of Idaho and makes those records available for inspection as needed.

The DSE has a designated representative from upper management (currently the IDVR Administrator) who is an ex-officio member of the Idaho SILC. As such, the

DSE is a SPIL Development Committee member and reviews quarterly and annual reports, budgets and audits.

The DSE complies with the Notice of Award (NoA) and provides yearly financial reports, and other information and data as defined in the award. If required, the DSE may provide additional program assurances and information.

4.4 Administration and Staffing

Administrative and staffing support provided by the DSE.

The DSE does not provide administrative or staffing support to the Idaho SILC.

4.5 State Imposed Requirements

State-imposed requirements contained in the provisions of this SPIL including: (45 CFR 1329.17(g))

- State law, regulation, rule, or policy relating to the DSE’s administration or operation of IL programs
- Rule or policy implementing any Federal law, regulation, or guideline that is beyond what would be required to comply with 45 CFR 1329
- That limits, expands, or alters requirements for the SPIL

IDVR applies the same rules to the Part B IL grant that it uses for all other Federal grants and for any financial activities. IDVR follows state and Federal regulations and the grant requirements. No additional rules apply that would limit, expand or alter requirements for the SPIL.

4.6 722 vs. 723 State

Check one:

722 (if checked, will move to Section 5)

723 (if checked, will move to Section 4.7)

4.7 723 States

Order of priorities for allocating funds amounts to Centers, agreed upon by the SILC and Centers, and any differences from 45 CFR 1329.21 & 1329.22.

How state policies, practices, and procedures governing the awarding of grants to Centers and oversight of the Centers are consistent with 45 CFR 1329.5, 1329.6, & 1329.22.

Section 5: Statewide Independent Living Council (SILC)

5.1 Establishment of SILC

How the SILC is established and SILC autonomy is assured.

Governor Cecil D. Andrus provided for the establishment of the Idaho SILC in 1993 by Executive Order 9301. The Idaho SILC became a self-governing state entity in 2004 as established in Idaho Code, Title 56, Chapter 12. As such, the Idaho SILC is not housed within any other state agency, maintaining independent control when requesting legislative authority regarding staffing, state budget requests, reporting, contracts, travel, etc. Idaho SILC offices are not within any other state office structure. The Idaho SILC works in concert with the DSE, the Idaho Division of Vocational Rehabilitation (IDVR), but is not directed by the agency with regard to service provision or daily operation.

5.2 SILC Resource plan

Resources (including necessary and sufficient funding, staff/administrative support, and in-kind), by funding source and amount, for SILC to fulfill all duties and authorities.

State General Funds:	\$226,200 (subject to annual appropriation)
Part B	\$101,291
Title I, I&E	\$ 99,500
SILC Fund	\$ 29,114 (interest, rebates, donations)

Process used to develop the Resource Plan.

The Idaho SILC delegates to its Executive Director the responsibility to oversee development of a draft budget, including the Resource Plan for conducting Rehabilitation Act section 705 activities.

State General Funds

The Executive Director works with the SILC Fiscal Specialist to develop a budget request in cooperation with analysts from the Division of Financial Management and Legislative Services, and our liaison to the Governor's Office. Prior to preparation, the Council discusses the SPIL, including a review of budgetary needs and the activities for which the SILC leads or has an active role that may require additional resources. Occasionally, we are approached by other agencies or legislators to take on additional duties. If those fall within our federal or state authorities, the Council may elect to ask for additional state general funds. We do

not anticipate asking for additional state general funds during the coming SPIL, beyond what may be needed for operations within state systems. Those amounts are predetermined through the Governor's office and the Department of Administration, generally to cover changes to fringe benefits and technology systems. The Governor makes a recommendation to the Legislature dependent on state revenue forecasts. The State Fiscal Year (SFY) runs from July 1-June 30. State funds cannot be carried over to the following year.

Part B Funds

Part B funds are negotiated as part of the SPIL development process with the planning team, which includes the Center Directors, the SILC Chair and other Council members who do not work for the state or a CIL, and ex-officio members from ICBVI and the DSE. The Executive Director serves to provide information, technical assistance, and advise funding needs for effective SILC operations, and any additional duties. The full Council reviews and approves final negotiated Part B amounts for distribution among the Network of Centers, SILC and select community partners (ICBVI).

Title I, Innovation and Expansion Funds

Title I, I&E funds are offered by the DSE and agreed upon during each SPIL cycle.

Other Funds

SILC Development Fund

Unrestricted Funds are conserved to cover expenses not allowed by state or federal regulations, such as pizza for a youth activity or other events that may only last an hour or two. This fund may also be used for certain expense deposits (such as hotels) that we anticipate will be reimbursed through contracts in the following SFY.

Other Resources

The Council may on occasion direct the Executive Director to pursue grant funds that would align with the SILC's mission.

SILC Staffing - Coordination of Resources

SILC staff positions: Executive Director, one FTE; Financial Specialist, one FTE; Management Assistant, one FTE; one FTE Project Specialist. The SILC will use allocated funds to fund personnel, including health benefits, supplies, office space, IT systems and services and all other routine business services needed to conduct its duties and activities as authorized in section 705(c). The Idaho SILC will

continue to support independence through statewide financial literacy, emergency preparedness/response, primarily through state general funds; and youth activities resourced through a combination of Part B, I&E, state and private donations.

Process for disbursement of funds to facilitate effective operations of SILC.

The Idaho SILC's Executive Director is granted authority by the Council to approve day to day Resource Plan expenditures, in keeping with the Code of Federal Regulations, the Rehabilitation Act, 2 CFR 200 Office of Management and Budget Guidance, and the approved Idaho SILC budget. The Idaho SILC provides assurance that Resource Plan expenditures are appropriate for the purpose and funding period through standard accounting practices and maintenance of all financial records necessary for auditing by appropriate state or federal entities. All SILC funds are held by the state and dispersed through the internal state accounting system. The SILC fiscal specialist works with the Division of Financial Management and the Department of Administrations to ensure smooth operation within state software systems. Quarterly financial reports are provided to the Council for review and approval. The Designated State Entity receives, disburses, and accounts for Rehabilitation Act Resource Plan funds and expenditures, on behalf of the Idaho SILC, through the State Financial Management System. Resource Plan expenditures are subject to audits conducted by the Department of Human Services and the Idaho State Controller's Office (SCO) or a private auditor approved by the SCO. Under state statutory requirements, the Idaho SILC completes an annual audit through a private contractor.

Justification if more than 30% of the Part B appropriation is to be used for the SILC Resource Plan.

N/A

5.3 Maintenance of SILC

How State will maintain SILC over the course of the SPIL.¹

Prospective Council members are referred as nominees by the Center staff, current or former Council members and other stakeholders. Application forms are accepted on an ongoing basis with an emphasis in early spring recruitment. Completed applications are forwarded to the membership committee who review and interview qualified applicants. Selection of a nominee is based on demonstrated knowledge of the independent living philosophy along with the desire and ability to serve and meet the statutory requirements. The Idaho SILC asks that candidates

carefully consider their time commitment and other factors when submitting an application. The membership committee makes a recommendation to the full Council regarding its selection of a prospective nominee.

Upon selection, the nominee completes a nomination form provided by the Office of the Governor with the Council recommendation for appointment. This helps the Idaho SILC maintain a balanced and qualified membership, consistent with requirements in section 705 (b) of the Rehabilitation Act. The Idaho SILC and the Governor's office maintain records, including term lengths, to demonstrate that the Idaho SILC is fully compliant with requirements. Recently, appointments have been delayed due a change in administrations, increased scrutiny by the Governor's office related to criminal background checks and a backlog resulting from the COVID-19 emergency. We continue to work with the Governor's office to resolve delays and maintain compliance. The Governor's office requires that the SILC include four ex-officio members who are administrators or their designee from Medicaid, the Idaho Commission on Aging, the Idaho Division of Vocational Rehabilitation (DSE) and ICBVI.

Approximately six months prior to an anticipated vacancy, the SILC works with the CILs and other stakeholders to recruit applicants with knowledge of IL services and philosophy, and who come from one of each of Idaho's seven geographic areas, across disabilities and from diverse backgrounds, including those from underserved populations such as racial and ethnic minorities, young adults, urban, rural and LGBTQ+ communities. The Council may create at large seats to be filled by people with disabilities from underrepresented communities. The Governor appoints all members. Idaho ensures that no member of the SILC serves more than two consecutive full three-year terms in accordance with Idaho SILC bylaws and state law.

Idaho ensures that the SILC is composed of members who provide statewide representation, represent a broad range of individuals with disabilities from diverse backgrounds, and who are knowledgeable about the Centers and IL services, and willing to learn the SILC bylaws, policies and state law. Idaho also ensures that a majority of the SILC members, and voting members, are individuals with disabilities, who are not employed by any state agency or Center, as required in the SILC bylaws and state law. Given the rural nature of our state, the SILC may include member representatives who are employed by the state, outside of disability service agencies and Center staff. However, those members are not counted among the majority of people with disabilities who make up the voting membership.

With resource allocations identified in 5.2, the Idaho SILC coordinates Council meetings and activities in which the Council develops, implements, monitors and evaluates the State Plan for Independent Living (SPIL). The Idaho SILC holds quarterly public business and training meetings in accessible locations or online formats that are publicly noticed in compliance with state law. The Executive Committee meets approximately one month prior to Council meetings to discuss SILC business including, training opportunities/status, review meetings surveys, updates and set the agenda for Council meetings. Executive Committee meetings are held in accessible locations, on-line formats or conference lines and are publicly noticed in compliance with state law. The SILC resource plan includes travel and hotel accommodations for Council meetings, ASL interpreters for all public meetings, other language interpreters on request and meals, including lunches for peer to peer support and exchange of ideas during in person Council meetings lasting more than four hours. The SILC also established a training budget for Council members and select SILC staff to travel for conferences or participate in on-line training opportunities. Meeting materials are mailed, email and provided during in person meetings as requested by Council members or the public. Alternate formats preferences of Council members are always available and provided to members of the public on request.

Section 6: Legal Basis and Certifications

6.1 Designated State Entity (DSE)

The state entity/agency designated to receive and distribute funding, as directed by the SPIL, under Title VII, Part B of the Act is the Idaho Division of Vocational Rehabilitation.

Authorized representative of the DSE Jane Donnellan Title Administrator.

6.2 Statewide Independent Living Council (SILC)

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 The Idaho State Independent Living Council.

6.3 Centers for Independent Living (CILs)

The Centers for Independent Living (CILs) eligible to sign the SPIL, a minimum of 51% whom must sign prior to submission, are:

Living Independence Network Corporation (LINC)

Disability Action Center-Northwest (DAC-NW)

Living Independently For Everyone (LIFE)

6.4 Authorizations

6.4.a. The SILC is authorized to submit the SPIL to the Independent Living Administration, Administration for Community Living. Yes (Yes/No)

6.4.b. The SILC and CILs may legally carryout each provision of the SPIL. Yes (Yes/No)

6.4.c. State/DSE operation and administration of the program is authorized by the SPIL.
Yes (Yes/No)

Section 7: DSE Assurances

Jane Donnellan, Administrator acting on behalf of the DSE Idaho
Division of Vocational Rehabilitation located at 650 W. State Street Room 150,
Boise, ID 83720; phone: 208-334-3390; email: Jane.donnellan@vr.idaho.gov *45*
CFR 1329.11 assures that:

7.1. The DSE acknowledges its role on behalf of the State, as the fiscal intermediary to receive, account for, and disburse funds received by the State to support Independent Living Services in the State based on the plan;

7.2. The DSE will assure that the agency keeps appropriate records, in accordance with federal and state law, and provides access to records by the federal funding agency upon request;

7.3. The DSE will not retain more than 5 percent of the funds received by the State for any fiscal year under Part B for administrative expenses;¹

7.4. The DSE assures that the SILC is established as an autonomous entity within the State as required in *45 CFR 1329.14*;

7.5. The DSE will not interfere with the business or operations of the SILC that include but are not limited to:

1. Expenditure of federal funds
2. Meeting schedules and agendas
3. SILC board business

4. Voting actions of the SILC board
 5. Personnel actions
 6. Allowable travel
 7. Trainings
- 7.6. The DSE will abide by SILC determination of whether the SILC wants to utilize DSE staff:
1. If the SILC informs the DSE that the SILC wants to utilize DSE staff, the DSE assures that management of such staff with regard to activities and functions performed for the SILC is the sole responsibility of the SILC in accordance with Sec. 705(e)(3) of the Act (Sec. 705(e)(3), 29 U.S.C.796d(e)(3)).
- 7.7. The DSE will fully cooperate with the SILC in the nomination and appointment process for the SILC in the State;
- 7.8. The DSE shall make timely and prompt payments to Part B funded SILCs and CILs:
1. When the reimbursement method is used, the DSE must make a payment within 30 calendar days after receipt of the billing, unless the agency or pass-through entity reasonably believes the request to be improper;
 2. When necessary, the DSE will advance payments to Part B funded SILCs and CILs to cover its estimated disbursement needs for an initial period generally geared to the mutually agreed upon disbursing cycle; and
 3. The DSE will accept requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as necessary when electronic fund transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r).

The signature below indicates this entity/agency's agreement to: serve as the DSE and fulfill all the responsibilities in Sec. 704(c) of the Act; affirm the State will comply with the aforementioned assurances during the three-year period of this SPIL; and develop, with the SILC, and ensure that the SILC resource plan is necessary and sufficient (in compliance with section 8, indicator (6) below) for the SILC to fulfill its statutory duties and authorities under Sec. 705(c) of the Act, consistent with the approved SPIL.¹

Jane Donnellan, Administrator

Name and Title of DSE director/authorized representative

Signature

Date

Electronic signature may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.

Section 8: Statewide Independent Living Council (SILC) Assurances and Indicators of Minimum Compliance

8.1 Assurances

Eric Bjork, Idaho SILC Chair acting on behalf of the SILC Idaho State Independent Living Council located at 120 South Cole Road, Boise, Idaho 83709; phone: 208-334-3800 E.D. email address: mel.leviton@silc.idaho.gov; Eric Bjork email address: etbjork@yahoo.com *45 CFR 1329.14* assures that:

- (1) The SILC regularly (not less than annually) provides the appointing authority recommendations for eligible appointments;
- (2) The SILC is composed of the requisite members set forth in the Act;¹
- (3) The SILC terms of appointment adhere to the Act;¹
- (4) The SILC is not established as an entity within a State agency in accordance with 45 CFR Sec. 1329.14(b);
- (5) The SILC will make the determination of whether it wants to utilize DSE staff to carry out the functions of the SILC;
 - a. The SILC must inform the DSE if it chooses to utilize DSE staff;
 - b. The SILC assumes management and responsibility of such staff with regard to activities and functions performed for the SILC in accordance with the Act.¹

- (6) The SILC shall ensure all program activities are accessible to people with disabilities;
- (7) The State Plan shall provide assurances that the designated State entity, any other agency, office, or entity of the State will not interfere with operations of the SILC, except as provided by law and regulation and;
- (8) The SILC actively consults with unserved and underserved populations in urban and rural areas that include, indigenous populations as appropriate for State Plan development as described in Sec. 713(b)(7) the Act regarding Authorized Uses of Funds.¹

Section 8.2 Indicators of Minimum Compliance

Indicators of minimum compliance for Statewide Independent Living Councils (SILC) as required by the Rehabilitation Act (Section 706(b), 29 U.S.C. Sec 796d-1(b)), as amended and supported by 45 CFR 1329.14-1329.16; and Assurances for Designated State Entities (DSE) as permitted by Section 704(c)(4) of the Rehabilitation Act (29 U.S.C. Sec. 796c(c)(4)), as amended.

(a) STATEWIDE INDEPENDENT LIVING COUNCIL INDICATORS. –

- (1) SILC written policies and procedures must include:
 - a. A method for recruiting members, reviewing applications, and regularly providing recommendations for eligible appointments to the appointing authority;
 - b. A method for identifying and resolving actual or potential disputes and conflicts of interest that are in compliance with State and federal law;
 - c. A process to hold public meetings and meet regularly as prescribed in 45 CFR 1329.15(a)(3);
 - d. A process and timelines for advance notice to the public of SILC meetings in compliance with State and federal law and 45 CFR 1329.15(a)(3);
 - e. A process and timeline for advance notice to the public for SILC “Executive Session” meetings, that are closed to the public, that follow applicable federal and State laws;

- i. “Executive Session” meetings should be rare and only take place to discuss confidential SILC issues such as but not limited to staffing.
 - ii. Agendas for “Executive Session” meetings must be made available to the public, although personal identifiable information regarding SILC staff shall not be included;
 - f. A process and timelines for the public to request reasonable accommodations to participate during a public Council meeting;
 - g. A method for developing, seeking and incorporating public input into, monitoring, reviewing and evaluating implementation of the State Plan as required in 45 CFR 1329.17; and
 - h. A process to verify centers for independent living are eligible to sign the State Plan in compliance with 45 CFR 1329.17(d)(2)(iii).
- (2) The SILC maintains regular communication with the appointing authority to ensure efficiency and timeliness of the appointment process.
- (3) The SILC maintains individual training plans for members that adhere to the SILC Training and Technical Assistance Center’s SILC training curriculum.
- (4) The SILC receives public input into the development of the State Plan for Independent Living in accordance with 45 CFR 1329.17(f) ensuring:
- a. Adequate documentation of the State Plan development process, including but not limited to, a written process setting forth how input will be gathered from the state’s centers for independent living and individuals with disabilities throughout the state, and the process for how the information collected is considered.
 - b. All meetings regarding State Plan development and review are open to the public and provides advance notice of such meetings in accordance with existing State and federal laws and 45 CFR 1329.17(f)(2)(i)-(ii);
 - c. Meetings seeking public input regarding the State Plan provides advance notice of such meetings in accordance with existing State and federal laws, and 45 CFR 1329.17(f)(2)(i);
 - d. Public meeting locations, where public input is being taken, are accessible to all people with disabilities, including, but not limited to:
 - i. proximity to public transportation,
 - ii. physical accessibility, and

- iii. effective communication and accommodations that include auxiliary aids and services, necessary to make the meeting accessible to all people with disabilities.
 - e. Materials available electronically must be 508 compliant and, upon request, available in alternative and accessible format including other commonly spoken languages.
- (5) The SILC monitors, reviews and evaluates the State Plan in accordance with 45 CFR 1329.15(a)(2) ensuring:
 - a. Timely identification of revisions needed due to any material change in State law, state organization, policy or agency operations that affect the administration of the State Plan approved by the Administration for Community Living.
- (6) The SILC State Plan resource plan includes:
 - a. Sufficient funds received from:
 - i. Title VII, Part B funds;
 - 1. If the resource plan includes Title VII, Part B funds, the State Plan provides justification of the percentage of Part B funds to be used if the percentage exceeds 30 percent of Title VII, Part B funds received by the State;
 - ii. Funds for innovation and expansion activities under Sec. 101(a)(18) of the Act, 29 U.S.C. Sec. 721(a)(18), as applicable;
 - iii. Other public and private sources.
 - b. The funds needed to support:
 - i. Staff/personnel;
 - ii. Operating expenses;
 - iii. Council compensation and expenses;
 - iv. Meeting expenses including meeting space, alternate formats, interpreters, and other accommodations;
 - v. Resources to attend and/or secure training and conferences for staff and council members and;
 - vi. Other costs as appropriate.

The signature below indicates the SILC’s agreement to comply with the
aforementioned assurances and indicators:

Eric Bjork
Name of SILC chairperson

Signature Date

Electronic signature may be used for the purposes of submission, but hard copy of
signature must be kept on file by the SILC.

Section 9: Signatures

The signatures below are of the SILC chairperson and at least 51 percent of the
directors of the centers for independent living listed in section 6.3. These
signatures indicate that the Idaho State Independent Living Council and the
centers for independent living in the state agree with and intend to fully implement
this SPIL’s content. These signatures also indicate that this SPIL is complete and
ready for submission to the Independent Living Administration, Administration for
Community Living, U.S. Department of Health and Human Services.

The effective date of this SPIL is October 1, 2020 (year)

SIGNATURE OF SILC CHAIRPERSON DATE

Eric Bjork
NAME OF SILC CHAIRPERSON

Living Independently For Everyone
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR DATE

Mandy Greaser

NAME OF CIL DIRECTOR

Disability Cation Center - Northwest

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Mark Leeper

NAME OF CIL DIRECTOR

Living Independence Network Corporation

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Jeremy Maxand

NAME OF CIL DIRECTOR

Electronic signatures may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.