State Plan for Independent Living (SPIL) for Oklahoma for 2017-2019

General Information

Designated Agency Identification

State: Oklahoma

Agency: Oklahoma Department of Rehabilitation Services

Plan for: 2017-2019

Submitted in fiscal year: 2016

View grant 90IS0045-01 in the Grant Award screen.
Part I: Assurances

Section 1: Legal Basis and Certifications

1.1 The designated State unit (DSU) eligible to submit the State Plan for Independent Living (SPIL or the plan) and authorized under State law to perform the functions of the State under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs.

Oklahoma Department of Rehabilitation Services

1.2 The separate State agency eligible to submit the plan and authorized under State law to provide vocational rehabilitation (VR) services to individuals who are blind.

N/A

1.3 The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State.

Oklahoma Statewide Independent Living Council, Inc.

1.4 The DSU and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the SPIL.

Yes

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

Yes

1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law.

Yes

1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is Noel Tyler, Interim Director, DRS.

Section 2: SPIL Development

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

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

Yes

2.2 The DSU and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan. Yes

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

• appropriate and sufficient notice of the public meetings;
• reasonable accommodation to individuals with disabilities who rely on alternative modes of communication in the conduct of the public meetings, including providing sign language interpreters and audio-loops; and
• public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication.

Yes

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

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

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

Section 3: Independent Living Services

3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other funds. Yes

3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary. Yes
3.3 All service providers will use formats that are accessible to notify individuals seeking or receiving IL services under chapter 1 of title VII about:

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

Yes

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

Section 4: Eligibility

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

4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services. Yes

4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services. Yes

Section 5: Staffing Requirements

5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. Yes

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

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

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

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

Section 6: Fiscal Control and Fund Accounting

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

Section 7: Recordkeeping, Access and Reporting

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

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

Yes

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

Yes

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

Yes

Section 8: Protection, Use and Release of Personal Information
8.1 Each service provider will adopt and implement policies and procedures to safeguard the confidentiality of all personal information, including photographs and lists of names in accordance with the requirements of 34 CFR 364.56(a)(1-6).

Section 9: Signatures

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

The effective date of this SPIL is October 1, 2016.

Section 9: Signature for SILC Chairperson

Name Perry Sanders
Title SILC Chair
Signed? Yes
Date signed 06/30/2016

Section 9: Signature for DSU Director

Name Noel Tyler
Title Interim Director, DRS
Signed? Yes
Date signed 06/30/2016

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

Is there a Separate State Agency for Individuals Who Are Blind? No
Name
Title
Signed? No
Date signed
Part II: Narrative: Section 1 - Goals, Objectives and Activities

Section 1: Goals, Objectives and Activities

1.1 Goals and Mission

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

Goal Name: Mission of the Oklahoma SILC

Goal Description:

The Statewide Independent Living Council of Oklahoma (SILC), The Oklahoma Association of Centers for Independent Living (OKACIL) and the Oklahoma Department of Rehabilitation Services (DRS) have adopted as the overall philosophy for the Independent Living programs that:

Focus:

Independent Living is the control over one’s life based on the choice of acceptable options that minimize reliance on others in making decisions and in performing everyday activities. This includes managing one’s affairs, participating in day-to-day life in the community, fulfilling a range of social roles and making decisions that lead to self-determination and the minimization of physical or psychological dependence upon others.

Mission:

The SILC provides the leadership in guiding the state’s planning process for Independent Living Services so that needed services are available statewide.

Vision

The SILC envisions a political, social, and economic environment that plans for and actively promotes equal access and full integration of people with disabilities in society.

Values

The SILC values consumer control, equal access, equal opportunities, full integration, respect, personal code of ethics, self-reliance, self-determination, free and appropriate public education for every child with a disability, to be delivered in the least restrictive environment, support and validation in the community, empowerment, participation and celebration of diversity.
The Oklahoma Statewide Independent Living Council will promote policies, programs and activities to maximize independence of people with disabilities by: developing, monitoring, reviewing and evaluating the State Plan for Independent Living; by supporting and expanding the state network of Centers for Independent Living; by creating a culture for full integration and independence We will advocate for full access and equality in community life; educating policy makers and stakeholders about the importance of independent living, developing a strategy for collaboration among stakeholders in the disability community.

Goal Name: Goal 1

Goal Description:
Underserved and unserved areas of Oklahoma access Independent Living services

Goal Name: Goal 2

Goal Description:
Youth with disabilities become part of the IL movement in Oklahoma

Goal Name: Goal 3

Goal Description:
People with disabilities receive information and how to access services they need from the IL system

Goal Name: Goal 4

Goal Description:
Oklahoman's with disabilities will have access to current emergency management resources.

1.2 Objectives

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

<table>
<thead>
<tr>
<th>Goal(s) from Section 1.1</th>
<th>Objective to be achieved</th>
<th>Time frame start date</th>
<th>Time frame end date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Goal 1</td>
<td>By September 30, 2019, the Oklahoma Independent Living Network will receive State Funding appropriation for Independent Living services</td>
<td>10/01/2017</td>
<td>09/30/2019</td>
</tr>
<tr>
<td>Activity</td>
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<td>--------------------------------------------------------------------------------------------</td>
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<tr>
<td>Activity: Provide training and orientation to IL partners on the legislative process and developing legislation.</td>
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<td>Activity: Formalize funding needs, data sources and methodology for achieving state appropriation.</td>
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<tr>
<td>Activity: Contract with legislative liaison/specialist on developing value proposition to use in educating legislators.</td>
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<tr>
<td>Activity: Practice presentations in front of volunteer legislator panel for feedback.</td>
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<tr>
<td>Activity: Develop and disseminate information to the Governor and State Legislators highlighting the impact of Independent Living services in Oklahoma.</td>
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<tr>
<td>Activity: Facilitate meetings with Legislators to discuss introduction of legislation to provide state IL funding or inclusion in the State’s budget.</td>
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<tr>
<td>Activity: Engage in advocacy efforts to achieve passage of legislation or a state budget that includes funding for IL services.</td>
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</tbody>
</table>

**Goal 2**

By September 30, 2019, Ten (10) Oklahoma youth with disabilities are working/volunteering within the Oklahoma IL Network.

<table>
<thead>
<tr>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity: Identify and recruit emerging leaders, age 18-30, from other young adult organizations, including minority youth groups who don’t currently serve people with disabilities as part of their platform.</td>
</tr>
<tr>
<td>Activity: Coordinate with the Oklahoma Youth Leadership Forum to sponsor training and recruit transitioning young adults who have disabilities.</td>
</tr>
<tr>
<td>Activity: Coordinate to receive online leadership and training opportunities for young adults/emerging leaders and introduce to IL culture.</td>
</tr>
<tr>
<td>Activity: Coordinate with CILs to cultivate potential leaders and expand training experience.</td>
</tr>
<tr>
<td>Activity: Promote young advocates for leadership positions at CILs, non-profit organizations, state boards, etc.</td>
</tr>
<tr>
<td>Goal 3</td>
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<tr>
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<tr>
<td>Activity: Develop SILC webpage</td>
</tr>
<tr>
<td>Activity: Maintain and update its social media sites regularly, sharing education, training and information the centers are presenting, hosting and participating in.</td>
</tr>
<tr>
<td>Activity: Present to groups and exhibit at statewide conferences that benefit Oklahoma's with disabilities, and have a presence on National boards.</td>
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<tr>
<td>Activity: Implement a PR Committee and campaign through social media incorporating any existing PR avenues established by Oklahoma CILs that will also be shared with partner agencies for maximum exposure.</td>
</tr>
<tr>
<td>Activity: Ensure that IL information and links on other partner pages is current and accurate to reach a more broad audience.</td>
</tr>
<tr>
<td>10/01/2017</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Goal 4</th>
<th>By September 30, 2019 Oklahoma's with disabilities will have access to current emergency management resources and are included in emergency preparedness procedures and activities.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity: Identify and implement online training and materials for use by CILs, Tribal VR and/or other service providers to educate people with disabilities about being prepared in a disaster.</td>
<td></td>
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<tr>
<td>Activity: Provide input to Oklahoma State Department of Emergency Management, news media, and other Emergency Management organizations on the needs of people with disabilities in emergency situations.</td>
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<tr>
<td>Activity: Disseminate information to CIL/Tribal VR for their consumers regarding disaster preparedness.</td>
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<tr>
<td>Activity: Advocate that all emergency management and disaster preparedness material issued from State Dept. of Emergency Management is in available in alternative format.</td>
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<tr>
<td>Activity: Target news media and advocate for changes in using descriptive street names for Oklahoma's who are blind/low vision when giving severe weather warnings.</td>
<td></td>
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<tr>
<td>10/01/2017</td>
<td>09/30/2019</td>
</tr>
</tbody>
</table>
1.2 Objectives

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

- Identify the populations to be designated for targeted outreach efforts

OKACIL has identified several populations that Oklahoma needs to serve people with disabilities including veterans, individuals transitioning from institutional settings, the homeless, the growing aging population, the deaf community, and rural residents. Minority populations that are unserved/underserved are primarily African Americans Native Americans and Hispanic/Latino.

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

Oklahoma has 55 counties that are not included in the service areas of the existing 5 CILs so we have many unserved and underserved areas. Those counties include Adair Atoka Beaver Beckham Blaine Bryan Caddo Carter Cherokee Choctaw Cimarron Coal Comanche Cotton Custer Delaware Dewey Ellis Garvin Grady Greer Harman Harper Haskell Hughes Jackson Jefferson Latimer LeFlore Johnston Kiowa Lincoln Love Marshall Mayes McCurtain McIntosh Murray Muskogee Okfuskee Okmulgee Ottawa Pawnee Payne Pontotoc Pushmataha Roger Mills Seminole Sequoyah Stephens Texas Tillman Washita Woods and Woodward. In addition the 22 counties that are in the service areas of the 5 CILs have populations that are unserved/underserved.

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

  - The SILC website will be designed to provide outreach and resource links
  
  - Training opportunities in initiatives such as but not limited to benefits planning, ADA accessibility, housing tax credits, cultural diversity, assistive technology, and other relevant areas are being covered by CIL staff to maximize skills relative to IL and enhance provided services.

  - The SILC in collaboration with OKACIL and the DSE will research innovative options such as formula funding, expansion strategies used by other states and entities, and other innovative plans during the next three years to have a clearly defined vision and plan for supported expansion of Oklahoma's network in future SPILEDs.

SILC will promote and recommend appointments to the Council of individuals with disabilities from those targeted minority groups identified by various community partners. SILC will also support and recommend potential Council members from underserved/underserved geographical areas of the state.

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

1.3A Financial Plan Tables

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

Year 1 - 2017 Approximate funding amounts and uses

<table>
<thead>
<tr>
<th>Sources</th>
<th>SILC resource plan</th>
<th>IL services</th>
<th>General CIL operations</th>
<th>Other SPIL activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title VII Funds</td>
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<tr>
<td>Title VII Funds Chapter 1, Part B</td>
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<tr>
<td>Title VII Funds Chapter 1, Part C</td>
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<tr>
<td>Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)</td>
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<tr>
<td>Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)</td>
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<tr>
<td>Other Federal funds - other</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Federal funds - State funds</td>
<td>29678</td>
<td></td>
<td></td>
<td>4250</td>
</tr>
<tr>
<td>Non-Federal funds - Other</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>121283</td>
<td>857435</td>
<td>213745</td>
<td>4250</td>
</tr>
</tbody>
</table>

Year 2 - 2018 Approximate funding amounts and uses

<table>
<thead>
<tr>
<th>Sources</th>
<th>SILC resource plan</th>
<th>IL services</th>
<th>General CIL operations</th>
<th>Other SPIL activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title VII Funds</td>
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</table>


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 B funds will support all SPIL objectives to be administered by the SILC. For the activities in Goal 1, SILC proposes to spend:

* $750 to hire a trainer to train on the legislative process
* $750 to contract with a legislative specialist/liaison to provide training to SILC and CILs on how to speak to legislators

For Goal 2, SILC proposes to spend:

* $400 for mail outs to youth-related organizations

For Goal 3, SILC proposes to spend:

* $2,000 for promotional items to use to exhibit at conferences and trainings

No Part B funding is used by the CILs for direct services.

Part C funding will continue to be used to support CIL operations.

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 only state funding is the match for Title VII, Chapter 1, Part B funds.

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.

The DSE occasionally provides surplus furniture, copying and copy paper OKSILC.

The DSE liaison to the OKSILC, traditionally responsible for IL issues, meets quarterly with the OKSILC executive director to ensure good communications and to provide technical assistance as needed.

The DSE provides internet/Wi-Fi for SILC, as well as a controlled environment by installing a key-card enabled entry into the SILC office.

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

Travel and training expenses are forecasted and approved by the SILC. Part B IL funds are used to cover these expenses. Oklahoma receives $305,350 in Part B funding, and OKSILC will retain 30% as stated in WIOA Regulations. For the first year OKSILC will retain all state matching
funds and then the amount will taper off for year 2 and 3. SILC has always operated on $143,000 and this is the best solution agreed to by the DSE, SILC and 51 percent of the center directors to gradually reduce the SILC budget to just 30% only. The remaining Part B funds will be evenly distributed among the CILs, and the remaining amount of state match for years 2 and 3 will be distributed among the CILs. These funds are contracted through the DSE and are used by the CILs for general operation, and are not utilized for IL services. The Part B funds that OKSILC retains for operation pay the Executive Director salary, employee taxes, health benefits and retirement plan. There are no other employees. The Part B funds retained also pay for the rental of office space, phone services, Board insurance, travel for SILC members and E. D.. They provide for general operating expenses (office supplies, postage, office equipment when necessary, promotional items for exhibiting at events, etc), provide reasonable accommodations, and pay memberships in National organizations. The Part B funds help OKSILC sponsor or co-sponsor events and activities as spelled out in the SPIL. Due to the budget crisis Oklahoma is currently battling, the DSE is experiencing detrimental budget cuts and can not provide I&E funding to IL at this time, but will revisit the subject once the state's overall budget shows improvement. The state of Oklahoma is in a $1.3 Billion dollar shortfall, and there are no additional funds with any state agency or organization available to supplement the SILC budget and allow us to reduce the Part B funds that SILC retains. IL has never received state appropriations, thus we have included those activities in this SPIL, and our hope is that once the state budget crisis is minimized, IL will be able to garner a line item in the DSE budget for state appropriated funds. If this occurs during this SPIL cycle, and funds are obtained either through state appropriations, or through the availability of I&E funds, the SPIL will be re-evaluated and the budget reconsidered, thus freeing up additional Part B funds from the SILC budget that will be equally allocated among the CILs. Currently there are no state funds available to IL other than the 10% match received from the DSE.

The DSE will retain up to 5% of the Part B funds as outlined in the Act.

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

1.4A Describe how the SPIL objectives are consistent with and further the purpose of chapter 1 of title VII of the Act as stated in section 701 of the Act and 34 CFR 364.2.

The SPIL reflects the beliefs of the OKSILC and the CILs in promoting a philosophy of independent living including a philosophy of consumer control, peer support, self-help, self-determination, equal access, individual and system advocacy, empowerment, independence, and productivity of individuals with disabilities and to promote and maximize the integration and full inclusion of individuals with disabilities into the mainstream of American society.

The SPIL encourages coordination, cooperation, and communication between the OKSILC and CILs as well as the DSE. This provides an opportunity to help ensure that all stakeholders are advised of, sensitive to, and responsive to the needs of individuals with significant disabilities identified by the centers in their service areas.
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 CILs, the SILC, and the DSE are all part of the SPIL planning team. Every effort is made to ensure that all stakeholders have ample opportunities to provide input into the development of the objectives for the SPIL, as well as the other elements of the State Plan. The SPIL Committee members reviewed the comments from the public and added or modified objectives and action steps that would result in an increase in the availability and quality of community options for IL. The ILs provided leadership in the development of the objectives, action steps, and outcomes for this SPIL.

1.5 Cooperation, Coordination, and Working Relationships Among Various Entities

Describe the steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC, and centers; the DSU, other State agencies represented on the SILC and other councils that address the needs of specific disability populations and issues; and other public and private entities determined to be appropriate by the SILC.

The description must identify the entities with which the DSU and the SILC will cooperate and coordinate.

The SILC, the CILs, and DSE will continue to communicate and network with public and private systems to address independent living concerns of Oklahomans with disabilities. Through a variety of collaborative activities, the CILs, SILC and DSE director and staff members work together to identify areas of need, address problems, and develop solutions. These collaborative activities of the DSE, CILs, and the SILC will include, but are not limited to:

(a.) The DSE and SILC plans to continue representation on the state-s AgrAbility Project Advisory Board. This has opened dialogue and greater participation for Oklahoma-s farming committee to access VR services and also to become aware of IL opportunities and accommodations.

(b.) The DSE and SILC plan to have representation on the ABLE Tech Advisory Board; the State-s federal AT project, allowing greater awareness and access to AT, demonstrations, evaluations, and loan equipment to Oklahomans with disabilities. The DSE-s involvement with the ABLE Tech program has allowed for funding for an assistive technology lending library that will allow for short term loans to any individual in the State of Oklahoma with a disability to insure compatibility for their needs prior to purchase of equipment.

(c.) The SILC provides IL orientation for the DSE-s new employee training academies thus enhancing awareness of IL resources, services and availability and the intent is to continue to provide this training.
(d.) The SILC will continue to have an opportunity to report at all Commission for Rehabilitation Services meetings.

(e.) The SILC and CILs plan to continue participation in the Oklahoma Health Care Authority’s Living Choice Advisory Board. (Oklahoma’s Money Follows the Person initiative)

(f.) The DSE, SILC and CIL are participants in the sponsorship and planning work on the Governor’s Conference on Developmental Disabilities.

(g.) SILC and CILs participate in the DSE day at the Capitol heighten the awareness of the needs of individuals with disabilities in the state.

(h.) SILC/ORC cross membership has continued with one member being on both councils and providing reports. The staff from both entities participates in each other’s open meetings as much as possible. This has provided more continuity and less duplication of efforts.

(i.) CIL and SILC personnel have been working with the Oklahoma Department of Human Services, Aging Services Divisions Aging and Disability Resource Consortium.

(j.) CIL and SILC personnel have continued to work with Oklahoma’s United We Ride program.

(k.) SILC members serve on various other disability organizations.

1.6 Coordination of Services

Describe how IL services funded under chapter 1 of title VII of the Act will be coordinated with and complement other services to avoid unnecessary duplication with other Federal, State, and local programs, including the OIB program authorized by chapter 2 of title VII of the Act, that provide IL- or VR-related services.

DSE will continue to administer the OIB program in Oklahoma and services will not be duplicated. CIL support will commence after OIB services cease. CIL directors who serve on the SILC also serve on other IL initiatives in the state such as the Money Follows the Person and Aging Disability Resource Consortium projects and will keep the SILC and DSE apprised. Oklahoma is grossly underfunded in IL services and community integration.

1.7 Independent Living Services for Individuals who are Older Blind

Describe how the DSU seeks to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under the Older Individuals who are Blind program and that the DSU determines to be effective.

IL Services for Oklahomans served via the Older Blind (OB) grant will continue to be a collaborative effort with the DSEs Rehabilitation Teaching services under the Title 1 program. The plan is to take advantage of the expertise of staff that can provide the very difficult and hard
to find services of Orientation and Mobility and Rehabilitation Teaching. The DSE will use a portion of the OB funds to purchase these services from the existing program Title 1 program.

ABLE (Adult Blind Learning Experience) is an Older Blind center where individuals are given an opportunity to work with rehabilitation professionals in a concerted effort. The ABLE program has used the Oklahoma School for the Blind in years past, but will now utilize the new Visual Services Center in the heart of Oklahoma City. The Center's staff consists of Rehabilitation of the Blind Specialists who provide Rehabilitation Teaching and Orientation and Mobility services, a deaf-blind specialist, an ophthalmologist that is a low vision specialist, and therapist, technology program manager and specialist. This is now duplicated in Tulsa.

In addition to the centralization of Older Blind services to the center concept, the DSE also plans to expand the outlying areas of the state to provide individualized services where there are gaps in service delivery. The DSE is currently involved in a workforce planning program to help establish the areas where Older Blind services need to be enhanced and/or improved.
Part II: Narrative: Section 2 - Scope, Extent, and Arrangements of Services

2.1 Scope and Extent

2.1A Check the appropriate boxes in the SPIL Instrument table indicating the types of IL services to be provided to meet the objectives identified in section 1.2 of this SPIL, and whether the services will be provided by the CILs or by the DSU (directly and/or through contract or grant).

<table>
<thead>
<tr>
<th>Table 2.1A: Independent living services</th>
<th>Provided by the DSU (directly)</th>
<th>Provided by the DSU (through contract and/or grant)</th>
<th>Provided by the CILs (Not through DSU contracts/grants)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Core Independent Living Services - Information and referral</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Core Independent Living Services - IL skills training</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Core Independent Living Services - Peer counseling</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Core Independent Living Services - Individual and systems advocacy</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Counseling services, including psychological, psychotherapeutic, and related services</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>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)</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Rehabilitation technology</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Mobility training</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Service Description</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
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<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
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<tr>
<td>Personal assistance services, including attendant care and the training of personnel providing such services</td>
<td></td>
<td></td>
<td>Yes</td>
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<tr>
<td>Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services</td>
<td></td>
<td></td>
<td>Yes</td>
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<tr>
<td>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</td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Education and training necessary for living in the community and participating in community activities</td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Supported living</td>
<td></td>
<td></td>
<td>No</td>
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<tr>
<td>Transportation, including referral and assistance for such transportation</td>
<td></td>
<td></td>
<td>Yes</td>
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<tr>
<td>Physical rehabilitation</td>
<td></td>
<td></td>
<td>No</td>
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<tr>
<td>Therapeutic treatment</td>
<td></td>
<td></td>
<td>No</td>
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<tr>
<td>Provision of needed prostheses and other appliances and devices</td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Individual and group social and recreational services</td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>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</td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>Services for children with significant disabilities</td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>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</td>
<td></td>
<td></td>
<td>Yes</td>
</tr>
</tbody>
</table>
2.1B Describe any service provision priorities, including types of services or populations, established for meeting the SPIL objectives identified in section 1.2.

Because Oklahoma CILs do not utilize Title VII, Part B funds for direct independent living services to consumers, the SILC and CILs do not establish service provision priorities in the SPIL. The ability to establish service priorities is delegated to each CIL, based upon the needs of individuals residing in their localities. This further incorporates the practice of consumer control in the design and operation of all CIL programs.

Training opportunities in initiatives such as but not limited to benefits planning, ADA accessibility, housing tax credits, cultural diversity, assistive technology, and other relevant areas will be subsidized for CIL staff to maximize skills relative to IL and enhance provided services. The SILCs intention is to provide CILs with training opportunities to more effectively provide IL services, and to garner state appropriations for future funding and expansion of IL Network.

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.

N/A

2.2 Arrangements for State-Provided Services

2.2A If the DSU will provide any of the IL services identified in section 2.1A through grants or contractual arrangements with third parties, describe such arrangements.
The DSU uses Title VII Part B funds to contract with the five Federal funded CILs for general operations.

Part B contracts for the CILs are only for general operating expenses, and are not used for IL services.

2.2B If the State contracts with or awards a grant to a center for the general operation of the center, describe how the State will ensure that the determination of an individual's eligibility for services from that center shall be delegated to the center.

The State does not award any funds to a center for their general operation, so this section is N/A.
Part II: Narrative: Section 3 - Design for the Statewide Network of Centers

3.1 Existing Network

Provide an overview of the existing network of centers, including non-Part C-funded centers that comply with the standards and assurances in section 725 (b) and (c) of the Act, and the geographic areas and populations currently served by the centers.

There is a total of $857,435 for the five Part C centers in Oklahoma. Last fiscal year, the Oklahoma CILs provided services in 22 of the state's 77 counties. There are 68,667 square miles in the State of Oklahoma with an estimated general population of 3,878,000. The Centers' total service area covers 18,756 square miles with an estimated general population of 2,509,138.

Progressive Independence (PI), Norman. Jeff Hughes, Executive Director AGREES to the terms of the SPIL and the Resource plan. PI serves the State's largest metropolitan area. According to the US Census Bureau data, there are 3,502 square miles in PI's service area that includes Oklahoma, Cleveland, McClain, Pottawatomie, and Canadian Counties. The 2014 estimated population for these 5 counties is 1,274,829.

Ability Resources (AR), Tulsa. Carla Lawson, Executive Director AGREES to the terms of the SPIL and the Resource plan. Ability Resources serves the State's second largest metropolitan area. There are 5,015 square miles in AR's service area that includes Tulsa, Creek, Osage, Rogers, and Wagoner Counties. The estimated population for these 5 counties in northeastern Oklahoma is 913,728.

Oklahomans for Independent Living (OIL), McAlester. Pam Pulchny, Executive Director AGREES to the terms of the SPIL and the Resource Plan. OIL serves 1 county in rural southeastern Oklahoma, and that is Pittsburg County. Total square miles for this county is 1,305 with an estimated population of 44,626.

Sandra Beasley Independent Living Center (SBILC), Enid. Frieda Kliewer, Executive Director AGREES to the terms of the SPIL and the Resource plan. SBILC serves 8 counties: Garfield, Major, Alfalfa, Grant, Kay, Noble, Kingfisher and Logan. There are 7,180 square miles in the 8 counties with an estimated population of 198,912.

Dynamic Independence (formerly Green Country Independent Living Resource Center) Bartlesville. Diana Garrett, Executive Director AGREES to the terms of the SPIL and the Resource Plan. This center serves 3 counties in the northeastern part of the state. These counties include Washington, Craig and Nowata. There are 1,743 square miles with an estimated population of 77,043 in these 3 counties.

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

Oklahoma has 55 counties that are not included in the service areas of the existing 5 CILs, so we have many unserved and underserved areas. Those counties include Adair, Atoka, Beckham, Blaine, Bryan, Caddo, Carter, Cherokee, Choctaw, Cimarron, Coal, Comanche, Cotton, Custer, Delaware, Dewey, Ellis, Garvin, Grady, Greer, Harman, Harper, Haskell, Hughes, Jackson, Jefferson, LeFlore, Johnston, Kiowa, Latimer, Lincoln, Love, Marshall, Mayes, McCurtain, McIntosh, Murray, Muskogee, Okfuskee, Okmulgee, Ottawa, Pottawatomie, Payne, Pontotoc, Pushmataha, Roger Mills, Seminole, Sequoyah, Stephens, Texas, Tillman, Washita, Woods, and Woodward. In addition, the 22 counties that are in the service areas of the 5 CILs, have populations that are unserved/underserved. In particular, the minority populations, primarily African Americans, Native Americans, and Hispanic/Latino are unserved/underserved.

Regular Part C Funding

- With regards to regular Title VII, Part C funding, the first priority will be to expand the center network by establishing a new center when sufficient fiscal year funding exists to do so, consistent with section 722(e)(3) and 722(d) after providing existing centers with the funding they received the prior year and a cost-of-living increase. The Oklahoma DSE, CILs and SILC concur that the minimum funding necessary to establish a new center is $500,000 of sustainable Part C Funding.

- The priority geographic area for establishing a new center, when sufficient funding exists or is made available through ACL, will be the area including and surrounding Lawton, Oklahoma. The exact number of counties will be determined at the time of the competition jointly by the SILC and the CILs.

- If new or excess Title VII, Part C funding is less than the amount necessary to support a new center, funds will be distributed to existing Part C centers using the same proportional distribution method as is used when distributing the centers- Part C award, until all centers reach a minimum base funding of $500,000 in Part C funding.

- When base funding for existing centers has reached the $500,000 minimum, any excess or additional funds that is insufficient to establish a new center will be distributed to existing Part C centers using the same proportional distribution method as is used when distributing the centers-Part C award.

- The SILC in collaboration with OKACIL and the DSE will research innovative options such as formula funding, expansion strategies used by other states and entities, and other innovative plans during the next three years to have a clearly defined vision and plan for expansion of Oklahomas network in future SPILs.

If a currently funded Part C Center lost funding, due to unforeseen circumstances or non compliance issues, Oklahoma would try to ensure a new CIL in the same catchment area would
be reestablished. All of our CILS are currently in locations that serve a very large portion of the state's disability and rural populations, so it is necessary to maintain service in those areas.

3.3 Section 723 States Only

3.3A If the State follows an order of priorities for allocating funds among centers within a State that is different from what is outlined in 34 CFR 366.22, describe the alternate order of priority that the DSU director and the SILC chair have agreed upon. Indicate N/A if not applicable.

N/A

3.3B Describe how the State policies, practices and procedures governing the awarding of grants to centers and the oversight of these centers are consistent with 34 CFR 366.37 and 366.38.

N/A
Part II: Narrative: Section 4 - Designated State Unit (DSU)

4.1 Administrative Support Services

4.1A Describe the administrative support services to be provided by the DSU for the SILS (Part B) program and, if the State is a Section 723 State, for the CIL (Part C) program. Refer to the SPIL Instructions for additional information about administrative support services.

The Oklahoma Department of Rehabilitation Services is the Designated State Unit for administration of the State plan.

In carrying out its duties as DSE, OKDRS assures that it will:

(1) Receive, account for, and disburse funds received by the State under Part B;

(2) Keep such records and afford such access to such records in regards to Part B funding.

(3) Retain not more than 5 percent of the funds received by the State for any fiscal year under Part B, for the performance of their duties.

(4) Adopt fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for federal funds provided to centers for independent living, and the Statewide Independent Living Council.

(5) Comply with all applicable federal and state laws and regulations, including those in 45 CFR part 75 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards).

(6) Perform such other duties and functions consistent with the State Plan for Independent Living as may be mutually agreed by the parties.

The SILC and the DSE agree that the DSE will provide administrative support to the SILC for activities agreed upon in the State Plan. These activities will include invoice processing, contract monitoring, and all collaborative efforts called for in the Act. The DSE will either attend or send designees to meetings, retreats, and special programs as offered by the SILC and the CILs.

The DSE has assigned a liaison (.20 FTE) to the SILC to help foster better relationships. This staff member, in conjunction with the VR/VS Training Unit, will provide state-wide training for all VR/VS rehabilitation professional staff to encourage better utilization of IL services as provided by the CILs. In addition, the DSE provides the following services to the IL program:

- Administrative assistant services, .20FTE
- Accounting services, .20FTE
- Contracting services, .20FTE

- Invoice processing services, .15FTE

- Records and Equipment Storage and moving, .05FTE

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

N/A
Part II: Narrative: Section 5 - Statewide Independent Living Council (SILC)

5.1 Resource plan

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

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

For more information click the icon.

In conjunction with the DSE, the SILC will prepare a Resource Plan for the provision of resources, cash or in-kind, including grants/contracts to centers, staff and personnel, rent, supplies, telephone expenses, travel, and other expenses (e.g., personal assistance services, etc.) that will be necessary to carry out the functions of the SILC during the term of the SPIL.

The SILC resource plan includes:

- 91,605 dollars in Part B Funds and 33,928 dollars in non-Federal state funds for year 1. 91,605 in Part B Funds and 22,053 in non-Federal state funds for year 2. 91,605 in Part B Funds and 10,178 in non-Federal state funds for year 3.

OKSILC resource plan will be re-evaluated at the end of FY 2017 to ensure this amount is adequate, necessary, and sufficient for the accomplishment of the SILC's duties and authorities.

The SILC intends to conduct activities under the new authorities provided for the Act as follows:

? Conduct advocacy activities to ensure state policies and services are in place that ensure all Oklahomans are valued equally and participate fully in their communities.

? Develop and implement a resource development plan to support the activities of the SILC.

? Collaborate with the CILs on resource development to expand capacity of current CILs and to establish new CILs.

? Conduct leadership development activities for current and potential SILC members.

? Conduct outreach to and leadership development activities for youth with disabilities.

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 Council reviews the resource plan at each quarterly meeting. SILC's monthly requests for reimbursements are passed to the DSE liaison to be submitted to the State financial department.

The SILC will be responsible for the proper expenditure of funds and the use of resources it receives under the SILC Resource Plan.

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

No conditions or requirements are included in the SILC Budget that will compromise the independence of the SILC.

While assisting the SILC in carrying out its duties under the SPIL, staff and other personnel assigned to the SILC under the SILC Resource Plan will not be assigned duties by the DSE or other agency or office of the State that would create a conflict of interest. OKSILC relies to the maximum extent possible on the resources in existence during the period of the implementation of the SPIL.

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

The SILC and the DSE support the idea of Part B funds to be used to further the purpose of Title VII, Chapter 1 of the Act.

All funds included in the SPIL are based on current fiscal year Part B funding. Should funding be decreased, or be increased, the SILC will review, and revise as needed, the funding amounts in the SPIL.

5.2 Establishment and Placement

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

The SILC is not established as an entity within any CIL or State agency, including the DSE, and is independent of the CILs, DSE and all other State agencies. Following is a brief description of the legal status and placement of the SILC:

In 2007, The Statewide Independent Living Council of Oklahoma, Inc. became a 501(c) 3 status, non-profit agency at 3535 NW 58th, Suite 480, Oklahoma City, OK 73112. It is independent of the DSE. The SILCs operational functions are delegated to a paid SILC Executive Director. Prior
to 2007, the SILC was established through an Executive Order by the Governor of the State of Oklahoma, but maintained operations independent from any state agency.

5.3 Appointment and Composition

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

The Governor appoints all SILC members from a pool of candidates recruited by the SILC and other disability associations. Candidates are appointed to serve a three-year term and may serve for two consecutive three-year terms. An individual may be appointed to fill a vacancy to complete the remainder of an original term. Such individuals are eligible to serve for two additional three-year appointments.

Individuals submit applications and resumes to the Governor's office. The Governor's office makes an effort to contact the SILC Executive Director or the SILC Chair to determine if the applicants meet the SILC's current needs (the Executive Director maintains a list of current SILC members, disability breakdown, and geographic locations). Applicants are also invited to attend a regular SILC meeting before appointments to the SILC are made. After input from the SILC, the Governor's office acts upon the applications. The Chair of SILC is elected by voting members of the SILC annually.

5.4 Staffing

Describe how the following SILC staffing requirements will be met.

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

The SILC Executive Director is directly supervised by the SILC Chair. The Executive Committee is responsible for conducting an annual evaluation and setting clear performance objectives. To resolve some of the communication problems that have occurred in the past, the SILC drafted a communication policy that specifies any assignment to current or future SILC staff must go through the SILC Executive Director. Currently the Executive Director is the only 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.

N/A
Part II: Narrative: Section 6 - Service Provider Requirements

Describe how the following service provider requirements will be met:

6.1 Staffing

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

The SILC employs an Executive Director who has an understanding and background in Independent Living. The Executive Director, on behalf of the SILC, shall work with OKACIL to ensure the CILs have the support and resources necessary to attain and maintain well-trained staff. The SILC also provides training opportunities for SILC staff and board members.

All providers of IL services in Oklahoma under the SPIL are centers for independent living funded under Title VII, Part C of the Act. All grantees under the SPIL must comply with the Standards and Assurances for CILs under Section 725 of the Act and as a result are Part C funded CILs. Therefore, all service providers meet the requirements as directed by and monitored by HHS/ACL.

The centers ensure staff are specialists in the field of independent living, alternative communication, and to the maximum extent possible, provide staff who can communicate in alternative forms of communication.

- 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.

To ensure effective communication, all information to be disseminated at any SILC function must be available in alternative formats when requested. All written materials presented by SILC members at regularly scheduled SILC meetings and events will be in alternate formats to ensure accessibility. Guest speakers at all SILC functions will be advised by a letter prior to their appearance concerning accessibility and alternate formatting. Periodic training will be provided for new SILC appointees to ensure that accessibility issues and alternative formatting are understood and adhered to by all and that policy is followed.

Each center also maintains a list of interpreters, peer counselors, and other individuals who may assist with various forms of communication when necessary.

- 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.

The Executive Director, on behalf of the SILC, shall work with OKACIL to ensure the CILs have the support and resources necessary to attain and maintain well-trained staff. The SILC also provides training opportunities for SILC staff and board members.

- 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.

The SILC and the CILs practice fair and equal hiring, as they are considered an equal opportunity employer. The SILC follows its bylaws which state that at least 51 percent of members must be individuals with disabilities.

6.2 Fiscal Control and Fund Accounting

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

All CILs have adopted the fiscal controls and fund accounting that are required under the General Accounting Practices and OMB Uniform Administrative Requirements (2 CFR Chapter 1, and Chapter II, Parts 200,215,220,225, 230). All centers conduct annual independent audits that also include programmatic requirements in addition to the fiscal requirements. Each center also signs a cost reimbursement contract with DSE finance staff and is a 501 (c) 3.

6.3 Recordkeeping, Access and Reporting

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

The SILC complies with OMB circular A-122 revised.

All CIL fiscal records are maintained in each center’s office in accordance to the IRS requirements as to the number of years and types of records to be maintained.

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

All centers will file the annual performance report by the designated date, as required by the continuation award notice received by each federally funded CIL. Centers will maintain the
supporting documentation for fiscal control and fund accounting procedures that insure proper disbursement of and accounting for Federal funds.

SILC will also comply with submitting annual reports as required to maintain proper accounting of Federal Part B funds.

- 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.

The SILC complies with OMB circular A-122 revised. All records that are maintained by the SILC and the centers, both fiscal and programmatic, are kept in secure locations to ensure that any Federal representative may review them at any time necessary.

6.4 Eligibility

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

The SILC, CILs, SILS and DSE do not discriminate on the basis of age, color, creed, gender, national origin, race, religion or type of significant disability. There is no residence exclusion from IL services for anyone present in the state.

- 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.

Any individual may seek information from OKACIL members, the DSE, or the SILC about IL services provided through the SILS and/or CIL programs and services and/or other services and programs for individuals with significant disabilities and may be referred to such services and programs upon request.

- 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.

The SILC, CILs, SILS and DSE do not discriminate on the basis of age, color, creed, gender, national origin, race, religion or type of significant disability. There is no residence exclusion from IL services for anyone present in the state.

- 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.

All OKACIL members believe that people with disabilities must have the same freedom of choice and independence as every other citizen. Members do not discriminate on the basis of
age, sex, race, creed, political affiliation, national origin, religious belief, or disability in determining eligibility for services.

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

Individuals present in a center’s service area are not excluded from eligibility based on residence outside the service area and no State or local residence requirements are imposed. There is no residence exclusion from IL services for anyone present in the state.

6.5 Independent Living Plans

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

All IL consumers are given the option of writing an independent living plan or signing a waiver negating this necessity.

When an Independent Living Plan is completed, each consumer identifies specific goals they wish to achieve. Plans are reviewed periodically (time frame varies per center) to update as necessary. If a consumer chooses to have an Independent Living Plan, this Plan must be part of the CSR in order for the consumer to be considered active during any fiscal year.

6.6 Client Assistance Program (CAP) Information

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

All CIL staff are required to provide documentation in each CSR, signed by the consumer, that they have received information on the Client Assistance Program. The information provided includes what the CAP is, how it is funded, what it is for, and who to contact. Upon request of a consumer, this information is provided in the alternative format requested. A CAP brochure is provided to each consumer during the intake process, again in the format requested by the consumer. This signed document must be part of the CSR in order for the consumer to be considered active during any fiscal year. Materials are now available online and can be downloaded and printed at any time from www.odc.ok.gov.
6.7 Protection, Use and Release of Personal Information

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

Providers of IL services will ensure that all personal client information, current and stored, will remain confidential through adoption and implementation of policies and procedures in accordance the Rehabilitation Act. Consumers of IL services will be informed regarding the purpose of all requested personal information and the consequences for choosing not to provide needed information. Consumers will be informed of policies for release of information. Provision of information will be provided in a way that is understandable to the consumer. The SILC will assist in coordinating confidentiality compliance training for each of CILs for staff growth and development.
Part II: Narrative: Section 7 - Evaluation

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

Section 7: Evaluation

<table>
<thead>
<tr>
<th>Goal(s) and the related Objective(s) from Section 1</th>
<th>Method that will be used to evaluate</th>
</tr>
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</table>
| Goal 1                                           | 1. All SILC members will participate in legislative training  
                                                   | 2. All CIL Directors will participate in legislative training  
                                                   | 3. 75% of CIL staff will participate in legislative training  
                                                   | 4. Three legislative visits made by SILC members and CIL staff  
                                                   | 5. IL line item in DSE budget |
| Goal 2                                           | 1. Two young adults serving on SILC  
                                                   | 2. Eight young adults serving on CIL Boards |
| Goal 3                                           | 1. Three presentations each year made by SILC members  
                                                   | 2. 500 ?likes? on Facebook page, and 500 new people engaged in getting IL info  
                                                   | 3. Increase hits to webpage by 30% yearly using page tracker  
                                                   | 4. Two presentations made by CIL staff at SILC meetings |
| Goal 4                                           | 1. Monthly updates to CILs on outcome of EM committees/meeting attended (meetings attended by E.D. or council members)  
                                                   | 2. Four presentations will be made annually to local and statewide EM officials/boards/committees regarding the needs of people with disabilities in a disaster situation  
                                                   | 3. All Emergency Management literature will be made/available in alternative formats  
                                                   | 4. Four of Six news channels will add descriptive street names when giving severe weather warnings |
Part II: Narrative: Section 8 - State-Imposed Requirements

8 State-Imposed Requirements

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

N/A