



2007-2011 Developmental Disabilities State Plan

REVISED 2/07

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Alternate Format Copies of this Draft Plan are Available, Upon Request

* Technical revisions was made for compliance with ADD feedback & guidance on State Plan Submission.

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Mission Statement

To enrich the lives of Virginians with disabilities by providing a voice for their concerns--Vision of communities that welcome people with disabilities--Outreach to individuals, families, and advocates--Innovation through grant projects and sponsored programs--Collaboration with providers of disability services--Education of policymakers on disability issues.

The Developmental Disabilities Council State Plan--Background

The Virginia Board for People with Disabilities (the Board) serves the Commonwealth of Virginia as the state's Developmental Disabilities Planning Council and as the Governor's Advisory Council on issues affecting people with developmental disabilities.

Under federal law, each state has a DD Council, which receives funds to carry out systems-change, capacity building, and advocacy initiatives. Through these activities the Board seeks to impact the independence, productivity, inclusion and integration of people with disabilities in their communities.

All DD Councils are required to develop five-year state plans to enable them to fulfill optimally their mission and roles on behalf of people with disabilities, family members, service providers, and other disability stakeholders. The state plan provides the "framework" for each council's principal funding initiatives; staff work priorities, and Board member activities. It is important to note that the state plan provides a structure for the Board's work but does not include all activities undertaken by the Board or its staff. As required by federal law, it focuses primarily on where federal resources will be dedicated over the plan's five year period. State plans are reviewed on an annual basis and achievement of stated goals and objectives are reported in December of each year for the previous federal fiscal year. The five year state plan is, in accordance with federal requirements, released for a 45 day public comment period. The Board will compile and review comment received and revise the plan, as appropriate, prior to voting to approve the plan. The final plan as well as other information related to Board activities may be found on the VBPD website (www.vaboard.org). The 2007-2011 State Plan will go into effect on October 1, 2006.

Measuring Progress

The Board's activities are identified, shaped and focused through a comprehensive assessment and the state plan development process that is designed to reflect the changing needs of disability stakeholders as well as shifts in the state's policy, regulatory and fiscal environment. The Board achieves its organizational goals through an array of diverse activities including outreach and training, service system monitoring, provision of technical assistance, supporting and educating communities, eliminating barriers to service, building coalitions, informing policymakers and by funding systems change projects and activities throughout Virginia. The Board also achieves its organizational goals by engaging in advocacy training and leadership development initiatives statewide. The Board's work includes:

- **Constituent Outreach and Training.** The Board's constituent outreach and training activities are facilitated by board members and staff through liaison activities and participation on a number of statewide councils, commissions, advisory committees and task groups in both the public and private sectors that address diverse issues affecting individuals with disabilities and their family members. The purpose of these activities is to empower disability stakeholders by providing accurate, current information on the state's service system for people with disabilities as well as timely and responsive information to disability constituents regarding issues, events and operations throughout the state pertaining to their needs.
- **Service System Monitoring.** The Board collects and analyzes information regarding the needs of people with disabilities and assesses the effectiveness of service programs in meeting their needs. Through its diverse membership that includes people with disabilities, advocates, state and local agency representatives and private sector representatives, the Board engages ongoing discussion and assessment of access to services, the efficiency of the system and satisfaction of individuals with disabilities with the services they receive. The Board is in the process of completing its Biennial Assessment of Virginia's Disability Service system which is scheduled for release in late April 2006.
- **Information, Referral, and Technical Assistance.** The Board provides technical assistance to public and private-sector disability organizations throughout Virginia under the auspices of its grant-making activities, by responding to requests for information and assistance, by serving on committees, councils and advisory groups, or by proactively educating communities about the status, needs, rights or programs pertaining to people with disabilities in the state. Ongoing information and referral are provided on a daily basis to disability stakeholders seeking information and assistance by phone, e-mail and the Board's web site.
- **Supporting and Educating Communities.** The Board supports and educates numerous constituencies including people with developmental disabilities and their family members, the Governor and the Governor's policy staff, the Secretary of Health and Human Resources, members of the General Assembly, disability advocacy and consumer organizations, state and local disability services providers and public citizens. The Board maintains an ongoing presence on the Internet and proactive production, mailing and Internet posting of organizational and disability policy information. The Board maintains a web site that informs constituents about Board activities as well as meetings and events of interest in the disability community throughout the state. The web site contains reports, informational documents, program announcements, grant and program application information, Board meeting and activity information and diverse links to other disability resources and organizations nationally and statewide. The Board publishes and distributes, to approximately 3,000 individuals and organizations, a quarterly newsletter, "Voices and Visions."
- **Building Coalitions and Informing Policymakers.** The Board is able to serve as an independent voice and policy advisor on issues affecting persons with developmental and other disabilities to the Governor, legislators, state agencies, and other stakeholders. The Board strives to be a resource for information on the status of people with developmental and

other disabilities in the state in areas of employment, community living, education, health, housing and transportation.

- **Funding Systems Change Grants, Advocacy Training and Leadership Development.** For the past two decades the Board has provided millions of dollars of federal funding and has leveraged significant amounts of local government and private-sector funding to promote the demonstration, implementation and replication of projects that have demonstrably improved services, attitudes, knowledge and practice throughout diverse service systems pertaining to people with developmental and other disabilities in Virginia. Through its funding of over two-hundred systems change grants, trainings and leadership development activities, the Board has served as an important premiere catalyst for positive change throughout the service system.

Comprehensive Assessment

The goals and objectives included in the 2007-2011 State Plan emanated in large part from the Biennial (Comprehensive) Assessment conducted by the DD Council in 2005-2006. Very specific detail on the disability service system, including data and reference sources for the information below, are included in the Board's Biennial Assessment of the Disability Service System which is scheduled to be released on or before April 30, 2006. A summary of some of the key findings of the Biennial Assessment are below.

Virginia's disability service system is comprised of many dedicated, hardworking public and private organizations and the Commonwealth has made many positive strides in the area of disability services within the last few years.

- Two Governors have issued consecutive Executive Orders directing implementation of the U.S. Supreme Court *Olmstead v. L.C.* decision, reflecting an important commitment to community integration for persons with disabilities.
- **Additional funding** has been provided for autism and brain injury services, the Public Guardianship and Conservator Program, and the Commonwealth's Centers for Independent Living.
- Needed expansion of **Home and Community Based Waiver** services has occurred. The 2005 General Assembly approved the addition of 860 "slots" to the Mental Retardation Waiver; and 105 funded slots were added to the Developmental Disabilities (DD) Waiver. At the time of this report, a budget request for funding of additional Waiver slots for both the MR and DD Waivers is pending in the 2006 General Assembly. In July 2005, the Elderly and Disabled and Consumer Directed Personal Assistance Services Waivers were merged, which allowed consumer direction of all services under the "new" EDCD Waiver. An Alzheimer's Waiver has been developed and a Day Support Waiver for individuals on the Mental Retardation Waiver waiting list was implemented on July 1, 2005, having appropriations for 300 slots.

- A Joint Legislative and Audit Review Commission (JLARC) study of **Medicaid Waiver reimbursement rates** has been completed and this year's pending budget includes a small rate increase for providers.

All of the positive steps, and many more not reflected above, are important components to enabling people with disabilities in Virginia to experience maximum independence and inclusion into all facets of community life. Despite these encouraging developments, however, Virginia's service system for persons with disabilities has significant shortcomings that must be addressed by its citizens, policymakers, advocates, and providers. Some key issues, identified through the Board's Biennial Assessment to be released in late April 2006, are noted below. Additional detail on these and many other critical issues and challenges, including source/reference information will be available in the Assessment document.

- Services to persons with disabilities are administered in **highly compartmentalized systems** at both the state and local levels. Over 15 state agencies are responsible for hundreds of separately administered local offices, boards, councils, commissions, programs, and other entities. The system has so many different sources of information and points of entry and access, that it is difficult to understand, monitor and utilize the service. Intertwined responsibilities for funding, licensure, eligibility-determination, management, and oversight results in real and perceived conflicts of interest within and between agencies at all government levels.
- Virginia's service system is structured around historical definitions of disability or within very specific **service "silos"** based on either disability or type of service. The service system lacks a person-centered focus and a lifespan design. This is most evident regarding persons with developmental disabilities who do not have a concurrent diagnosis of mental retardation. Although implementation of the DD Waiver was a critical step in the right direction, Virginia, unlike in other states which have a more inclusive system of services, does not have a state entity designated with responsibility for policy development, service planning, or service provision for this population
- Funding for **community based vs. institutional services** for persons with developmental disabilities in Virginia has lagged behind most of the nation. The University of Colorado's *2005 State of the State in Developmental Disabilities* reports that Virginia is 50 out of 51 (50 states plus the District of Columbia) in this area. There remain lengthy waiting lists for the Mental Retardation and Developmental Disabilities Waivers, with funding lagging well behind established and projected needs. Low wages paid to direct care workers and inequitable rates paid by different agencies to providers of the same services restrain the development of community infrastructure as does a lack of a geographic rate differential for providers in high cost areas.
- **Services for children** continue to face challenges. While the number of youth in state Training Centers is low, the Commonwealth is experiencing the development of new nursing facility beds for children. In many instances, these children leave the nursing facility to attend school during the day, leaving a question as to whether these children need to reside in an institution and whether adequate community supports would help them stay with their families.

- In the **early intervention system** for infants and toddlers, documented challenges include significant variability of services across the state, in terms of both availability and quality, inconsistent application of requirements for eligibility, evaluation, service plan development and monitoring; and a lack of qualified providers, in part due to low provider rates and the reimbursement structure.
- For **school age children**, there remain significant disparities between students with and without disabilities in academic achievement and graduation rate. Barriers blocking access to the general curriculum and regular education classroom remain, particularly for students with severe disabilities. Many school divisions lack adequate numbers of qualified staff for students with “low incidence” disabilities, such as visual impairment or deafness, and many do not provide adequate planning and services to students with disabilities who are transitioning from secondary to post-secondary school or employment.
- As is the case nationally, individuals with disabilities in Virginia remain significantly unemployed or underemployed. According to 2000 U.S. Census data, only 30 percent of Virginians are in the workforce as compared to 82 percent of people without disabilities. The Commonwealth lacks a coordinated system and infrastructure designed to integrate **employment** services for individuals with disabilities in a manner which is consumer-directed and user friendly and which offers meaningful choice and exploration of creative, non-traditional employment options.
- **Transportation** services for people with disabilities in Virginia are managed and administered in highly compartmentalized systems at both the state and local level. Inadequate, unreliable, or inaccessible public transportation services significantly contribute to dependency - fiscal and personal - for individuals with disabilities. Current planning structures are disjointed. More importantly, transportation need assessments and planning too often fail to routinely consider the interests and concerns of persons with disabilities.
- Demand for affordable, accessible **housing** continues to grow while gaps between rising housing costs and limited incomes of people with disabilities continue to widen. Efforts to address these problems have been largely ineffective due to inadequate and inconsistent planning and coordination over time and in relation to transportation and other interrelated service needs. The lack of coordination further restricts options and opportunities for people with disabilities to live in communities rather than institutions. Despite numerous housing studies conducted over many years, progress and action to remedy identified problems remains elusive.
- The affordability and accessibility of **health care** and the shortage of specialty providers are significant general concerns for people with disabilities. Among healthcare services, the lack of adequate, affordable dental care is most urgent. In addition to being a health concern in and of itself, poor dental care is a major contributor to poor general health.

The Board recognizes that the issues noted above represent only a fraction of the challenges faced by persons with disabilities in the Commonwealth and notes again that its 2006 Biennial Assessment will contain a far more complete description and analysis of these and other

issues as well as a comprehensive description of Virginia's service system for persons with disabilities.

Identification of Areas of Emphasis

During FY 05-06, the Board continued its standing committee structure with a total of four committees: the ***Community Integration (CI) Committee***, the ***Community Living and Transportation (CLT) Committee***, the ***Employment (EM) Committee*** and the ***Education/Early Intervention (ED/EI) Committee***.

The DD Act includes nine Areas of Emphasis that DD Councils are to address in their state plans according to the needs of the state, input from individuals with disabilities, and the status of service delivery systems. The nine areas of emphasis are:

- ***Child Care***
- ***Education/Early Intervention***
- ***Employment***
- ***Health***
- ***Housing***
- ***Recreation***
- ***Quality Assurance***
- ***Transportation***
- ***Formal/Informal Community Supports***

Historically, Virginia's state plan document has been divided in accordance with the areas of emphasis in which the Council has chosen to work. For the 2007-2011 plan, however, the Council has organized its document by goal vs. area of emphasis. Many of the Council's goals and objectives are cross cutting and thus reporting them by area of emphasis would result in significant redundancy. The areas of emphasis to which each goal and objective apply are, however, noted.

The DD Council reviewed the extensive public comment received during development of the comprehensive assessment as well as an evaluation conducted of the Council's activities over the past 5 years. The Council also reviewed current commitments and emphases and embarked upon a strategic planning process designed to identify more clearly where the Council should head in the next 5 years. The following are the draft goals and objectives identified by the Council for its 2007-2011 State Plan.

Goal 1: Promote strategies that support moving people with disabilities from institutions to communities of their choice.

Area of Emphasis: Housing (HO)

Objective 1: Promote the development of a state low income housing subsidy for people with disabilities.

Area of Emphasis: Informal and Formal Community Supports (CS)

Objective 1: Promote strategies that support people with severe disabilities to live in the community.

Objective 2: Enhance education advocacy and outreach on community living options and transition supports to individuals who live in institutions and their family members/guardians.

Objective 3: Develop outreach mechanisms to educate family members of children with disabilities who are at risk of or currently living in institutional settings about formal and informal community supports.

Objective 4: Promote opportunities for greater community involvement and participation for people currently residing in institutions.

Goal 2: Promote cross-cutting local, regional, and statewide collaboration to build welcoming and accessible communities

Area of Emphasis: Housing (HO)

Objective 1: Improve community living options for people with disabilities by encouraging builders and local and state entities to build low income housing options.

Objective 2: Promote the building of multi-family and community housing options using universal design.

Area of Emphasis: Informal and Formal Community Supports (CS)

Objective 1: Promote direct support professionals as a valued valid career path

Goal 3: Positively influence and impact public policy through coordinated initiatives that promote meaningful inclusion in all aspects of community life.

Area of Emphasis: Education (ED)

Objective 1: Monitor and provide input on legislation, regulations and policy affecting special education and early childhood programs and services.

Area of Emphasis: Employment (EM)

Objective 1: Support implementation of federal, state and local legislation and policies that provide employment and create incentives for employment of people with developmental and other disabilities.

Objective 2: Support public sector internship and employment programs that result in jobs for people with developmental and other disabilities in Virginia state agencies.

Area of Emphasis: *Housing (HO)*

Objective 1: Encourage the provision of incentives when multi-family housing is developed where individuals have access to accessible public transportation.

Area of Emphasis: *Health (HE)*

Objective 1: Advocate for dental services to be added as a covered Medicaid service.

Area of Emphasis: *Cross-Cutting (CR)*

Objective 1: Engage in interagency and inter-organizational liaison activities to actively promote the Board’s activities and to influence the direction of programs and policies in the Commonwealth, with an emphasis upon entities that greatly influence community living including, but not limited to, members of the General Assembly and the Medical Community.

Objective 2: Through agency publications, website and other distribution means, routinely inform individuals with disabilities, family members, advocates, and professionals of current legislative or policy related initiatives and provide analysis which can assist stakeholders in developing and disseminating positions on such legislation.

Goal 4: Engage in advocacy and outreach to educate communities with the outcome of eliminating barriers that result in discrimination against people with disabilities.

Area of Emphasis: *Cross-Cutting (CR)*

Objective 1: Utilize the newsletter, “Voices and Visions” as well as the Board website and other publications to promote awareness and information relevant to people with disabilities, family members, advocates, and professionals.

Objective 2: Sponsor Community Service Awards that acknowledge outstanding community service that benefits people with developmental and other disabilities and expand statewide recognition of such awards.

Objective 3: Promote successful approaches that are identified and developed through Board funded projects and other initiatives.

Goal 5: Collaborate to ensure an innovative disability services system through partnerships with community organizations, businesses, and public agencies to leverage wide spread support for full inclusion.

Area of Emphasis: Education (ED)

Objective 1: Effect greater student and family involvement in obtaining adequate and improved transition services for employment and higher education opportunities.

Objective 2: Advance systems change by providing grant funding for new and creative statewide and community programs, services and supports for persons with developmental and other disabilities.

Area of Emphasis: Recreation (RE)

Objective 1: Promote greater participation of people with developmental and other disabilities in recreation and social opportunities in their communities.

Area of Emphasis: Quality Assurance (QA)

Objective 1: Collaborate with community and state agencies to promote the infusion of disability awareness and involvement in planning and service delivery systems.

Objective 2: Engage in interagency and inter-organizational liaison activities to actively promote the Board's activities and to influence the direction of programs and policies in the Commonwealth.

Area of Emphasis: Transportation (TR)

Objective 1: Support planning and coordination of transportation at the state and local level for full inclusion of people with disabilities.

Objective 2: Promote the improved quality of public and private transportation services for people with disabilities in the Commonwealth of Virginia.

Goal 6: Be a catalyst for self determination, choice, and policy influence through leadership and advocacy development.

Area of Emphasis: Quality Assurance

Objective 1: Conduct and evaluate premier leadership training activities for students through implementation of the Youth Leadership Forum.

Objective 2: Explore opportunities to leverage community resources to support the Youth Leadership Forum and alumni activities.

Objective 3: Prepare adults with developmental disabilities and parents of children with disabilities to become effective advocates and influence public policy decisions.

Objective 4: Encourage and promote active engagement in advocacy and system improvement activities by Partners in Policymaking participants and alumni of Board sponsored programs.

Objective 5: Provide technical assistance and financial resources to develop, strengthen, and promote a self advocacy initiative for the purpose of influencing public policy.

Objective 6: Continue the Board's Disability Policy Fellowship program to support the Board's public policy initiatives.

Objective 7: Continue the Board's Disability Policy Internship Program and review the program annually

Goal 7: Promote innovative approaches to integrated employment of people with developmental and other disabilities.

Area of Emphasis: Employment

Objective 1: Provide business leaders with the incentives, knowledge and tools they need to hire qualified people with developmental and other disabilities.

Objective 2: Promote the use of work incentives to increase integrated employment options for people with developmental and other disabilities.

Objective 3: Support self-employment opportunities for people with developmental and other disabilities, including individuals with the most significant disabilities.

Objective 4: Promote career exploration opportunities for middle and high school students with developmental and other disabilities.

Objective 5: Support the use of assistive technology to expand employment opportunities for people with developmental and other disabilities.

Objective 6: Encourage, support and reward creative ideas that promote best practices in employment of people with developmental and other disabilities.

PUBLIC COMMENT RECEIVED AND RESPONSE TO COMMENT

The Virginia Board for People with Disabilities (VBPD) received only three public comments on the draft State Plan, 2007-11. A summary of those comments and actions taken are provided below. All comments were shared with the Board and reviewed by appropriate committees at its June 2006 meeting. It is important to note that the Board received extensive public comment on its Biennial Assessment of the Disability Services system which was also used as a foundation for State Plan development. Because the Board held public forums and received comment on the Assessment, it is likely that constituents felt that their comments had been considered at that time.

Comment. One comment was from the Virginia Brain Injury Council. The VBIC commented on the need for improved quality of transportation services: *“We would like to encourage the Board to increase its emphasis on transportation not only in the area of planning and coordination but also in the area of quality. There exists an infrastructure in the Commonwealth which is fractured in terms of design but not nearly as fractured as the quality aspect of the system.”* The VBIC also expressed pleasure that housing was an issue at the top of the agenda as individuals with brain injury often fall within the "cracks" of the housing system.

Response to Comment. This issue was forwarded to the Board’s Community Living and Transportation Committee. The committee discussed and agreed with the need for improved quality of transportation services, and felt that the Board could influence change by adding the following objective to the State Plan: **Objective 2:** *Promote the improved quality of public and private transportation services for people with disabilities in the Commonwealth of Virginia.* This revision was approved by the full board at its June 2006 meeting.

Comment. Another comment applauded focus on (Objective 3, Goal 1) Informal and Formal Community Supports and prioritization of dental services for funding by state Medicaid.

Response. No action was needed.

Comment. The final comment was from an individual with a disability. This individual addressed the state plan objectives related to housing and community living supports. She asked for continued focus on people with disabilities living in institutions such as nursing homes and on preventing unnecessary, inappropriate admissions to them. She stated that ongoing efforts to educate families and individuals of community resources, supports, and activities are important.

Response. The comments were reviewed by the Community Integration Committee at the June Board meeting. Since these concerns were already addressed in the State Plan, no changes were made and through other Board activities.

ASSURANCES

- A. IN GENERAL. --The plan shall contain or be supported by assurances and information described in subparagraphs (B) through (N) that are satisfactory to the Secretary.
- B. USE OF FUNDS --With respect to the funds paid to the State under section 122, the plan shall provide assurances that--
1. not less than 70 percent of such funds will be expended for activities related to the goals described in paragraph (4);
 2. such funds will contribute to the achievement of the purpose of this subtitle in various political subdivisions of the State;
 3. such funds will be used to supplement, and not supplant, the non-Federal funds that would otherwise be made available for the purposes for which the funds paid under section 122 are provided;
 4. such funds will be used to complement and augment rather than duplicate or replace services for individuals with developmental disabilities and their families who are eligible for Federal assistance under other State programs;
 5. part of such funds will be made available by the State to public or private entities;
 6. at the request of any State, a portion of such funds provided to such State under this subtitle for any fiscal year shall be available to pay up to 1/2 (or the entire amount if the Council is the designated State agency) of the expenditures found to be necessary by the Secretary for the proper and efficient exercise of the functions of the designated State agency, except that not more than 5 percent of such funds provided to such State for any fiscal year, or \$50,000, whichever is less, shall be made available for total expenditures for such purpose by the designated State agency; and
 7. not more than 20 percent of such funds will be allocated to the designated State agency for service demonstrations by such agency that--
 - contribute to the achievement of the purpose of this subtitle; and
 - are explicitly authorized by the Council.
- C. STATE FINANCIAL PARTICIPATION --The plan shall provide assurances that there will be reasonable State financial participation in the cost of carrying out the plan.
- D. CONFLICT OF INTEREST --The plan shall provide an assurance that no member of such Council will cast a vote on any matter that would provide direct financial benefit to the member or otherwise give the appearance of a conflict of interest.
- E. URBAN AND RURAL POVERTY AREAS --The plan shall provide assurances that special financial and technical assistance will be given to organizations that provide community services, individualized supports, and other forms of assistance to individuals with developmental disabilities who live in areas designated as urban or rural poverty areas.
- F. PROGRAM ACCESSIBILITY STANDARDS --The plan shall provide assurances that programs, projects, and activities funded under the plan, and the buildings in which such programs, projects, and activities are operated, will meet standards prescribed by the Secretary in regulations and all applicable Federal and State accessibility standards, including accessibility requirements of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d), and the Fair Housing Act (42 U.S.C. 3601 et seq.).
- G. INDIVIDUALIZED SERVICES --The plan shall provide assurances that any direct services provided to individuals with developmental disabilities and funded under the plan will be provided in an individualized manner, consistent with the unique strengths, resources, priorities, concerns, abilities, and capabilities of such individual.

- H. HUMAN RIGHTS --The plan shall provide assurances that the human rights of the individuals with developmental disabilities (especially individuals without familial protection) who are receiving services under programs assisted under this subtitle will be protected consistent with section 109 (relating to rights of individuals with developmental disabilities).
- I. MINORITY PARTICIPATION --The plan shall provide assurances that the State has taken affirmative steps to assure that participation in programs funded under this subtitle is geographically representative of the State, and reflects the diversity of the State with respect to race and ethnicity.
- J. EMPLOYEE PROTECTIONS --The plan shall provide assurances that fair and equitable arrangements (as determined by the Secretary after consultation with the Secretary of Labor) will be provided to protect the interests of employees affected by actions taken under the plan to provide community living activities, including arrangements designed to preserve employee rights and benefits and provide training and retraining of such employees where necessary, and arrangements under which maximum efforts will be made to guarantee the employment of such employees.
- K. STAFF ASSIGNMENTS --The plan shall provide assurances that the staff and other personnel of the Council, while working for the Council, will be responsible solely for assisting the Council in carrying out the duties of the Council under this subtitle and will not be assigned duties by the designated State agency, or any other agency, office, or entity of the State.
- L. NONINTERFERENCE --The plan shall provide assurances that the designated State agency, and any other agency, office, or entity of the State, will not interfere with the advocacy, capacity building, and systemic change activities, budget, personnel, State plan development, or plan implementation of the Council, except that the designated State agency shall have the authority necessary to carry out the responsibilities described in section 125(d)(3).
- M. STATE QUALITY ASSURANCE --The plan shall provide assurances that the Council will participate in the planning, design or redesign, and monitoring of State quality assurance systems that affect individuals with developmental disabilities.
- N. OTHER ASSURANCES --The plan shall contain such additional information and assurances as the Secretary may find necessary to carry out the provisions (including the purpose) of this subtitle.