

State Plan for Independent Living (SPIL 101)

IL T&TA

Independent Living
Training & Technical Assistance Center

Before We Begin

- **English closed captions** are available by selecting the **CC** button in the Zoom recording.
- **Spanish audio and Spanish captions** are available by selecting the **Language** option in the Zoom recording.
- Explore the **IL T&TA Library** and **previous SILC trainings** for additional guidance and resources.
- Thank you for viewing this IL T&TA SILC Connection recording.

Learning Objectives –

- Ensure understanding of the SPIL, its requirements, and its potential power to elevate the voices of consumers in your state
- To Identify the stakeholder and public input requirements of the SPIL and have some ideas of how to gain public input
- To understand the SPIL instrument and instructions

Abbreviations to Know:

CIL = Center for Independent Living

SILC = Statewide Independent Living Council

DSE = Designated State Entity

Your Presenters:

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Purpose of Title VII (7) of the Act is to:

Promote a philosophy of independent living (IL) –

- Consumer Control
- Self-Help
- Equal Access
- Peer Support
- Self-Determination
- Individual and Systems Advocacy

in order to maximize the:

Leadership, empowerment, independence, and productivity of individuals with disabilities, and to promote the **integration and full inclusion** of individuals with disabilities into the **mainstream of American society...**

**REGULATIONS: 45 CFR 1329.2 QUOTES THE
REHAB ACT'S PURPOSE FOR IL**

Independent Living Training and Technical Assistance Center

Overview of the SPIL

What is the SPIL?

- The **State Plan for Independent Living** is a **three-year plan jointly developed by SILC and the Centers for Independent Living (CILs)**. This plan incorporates the input and thoughts of people with disabilities across the state to gain perspective and help direct our collective efforts.
- This plan also helps **direct funding for Independent Living Services** for individuals and serves as a way for the Independent Living Program to identify and meet the needs of the community.

What is Important About the SPIL?

- To be eligible to receive **Part B and Part C funding**, a state needs to submit and receive approval by ACL/OILP of a three-year State Plan for Independent Living (SPIL).
- The SPIL should serve as a blueprint for the **funding, goals, and activities** of the independent living network in the state.
- **Ensures consumer control of statewide funding and policy**
 - People with disabilities are making the decisions about funding, program focus, outreach plans, and expansion of the network.
- **People with disabilities run the CILs and the SILC** - and the CILs and the SILC are the SPIL decision-makers and authors.
 - The DSE must follow what is in the SPIL.

Who Uses the SPIL?

The SPIL Sets the Goals of the IL Network for the State

- While each CIL is responsive to its community needs and adjusts its programs accordingly. **The SPIL is an opportunity to look at big-picture trends and needs of people with disabilities statewide.** SPILs have their own missions, goals, and objectives.
- The SPIL should serve as a blueprint of statewide actions for the independent living network in the state.
- The SPIL activities should be integrated into the work plans of the CILs.

Who Writes the SPIL?

§ 1329.17 (d) The State plan must be jointly—

(1) Developed by the ***chairperson of the SILC***, and the ***directors of the CILs***, after receiving public input from individuals with disabilities and other stakeholders throughout the State;

Who Signs the SPIL?

Chairperson of the SILC

- acting on behalf of and at the direction of the SILC

The director of the DSE

- signifying agreement to execute the responsibilities of the DSE

Not less than 51 percent of the **directors of the CILs** in the State.

What does the SPIL get the IL Network to Agree on?

- Which state agency will serve as the **Designated State Entity (DSE)** and will receive and disseminate federal IL funds (Part B)
- Uses of **federal IL funds** (Part B)
- **Authorities of the SILC** and how the **SILC is funded**
- **CIL service areas** and how will it react to funding changes
- What **counties will be served by Part C Centers**
- What network gaps exist, and what **outreach plans** will be deployed to address them
- How the **SPIL will be monitored and evaluated**

Who is Involved in the SPIL?



SILC's Role in the SPIL Process

1. Develop the SPIL.
2. Monitor, review, & evaluate the implementation of the SPIL. Use approved CIL PPRs as one method to help track.
3. Meet regularly – open meetings.
4. Submit reports, including SPIL fulfillment portion of PPR report Part I
5. Coordinate activities with other entities.
6. Conduct Authorities as described in the law and outlined in SPIL, including advocacy and resource development.
7. Shall NOT provide or manage IL services, but SILCs do often provide I&R services.
8. Sign the SPIL to approve content.

DSE's Role in the SPIL Process

1. Serve as the “grantee” for Part B funding
2. Account to ACL for allowable uses and disbursement of funding per SPIL.
3. Provide administrative support for IL Program, where necessary.
4. Keep records. Complete PPR report with the SILC.
5. Submit required reports/information to ACL.
6. Retain not more than 5% of Part B for DSE administrative costs.
7. Sign the SPIL agreeing to serve as the DSE.

CIL's Role in the SPIL Process

1. Provide the Core IL Services.
2. Provide other IL services consistent with Federal and State Law.
3. Comply with CIL Standards, Assurances & Indicators.
4. Develop the SPIL with the SILC.
5. Implement the SPIL.
6. Conduct Resource Development activities.
7. More than 50% of CIL Directors must sign the SPIL to approve content.
8. Share approved annual PPRs with the SILC.

Community's Role in the SPIL

1. Respond to surveys and provide input on what is important to them.
2. Participate in public meetings about the SPIL.
3. Participate in input gathering sessions and opportunities.
4. Provide feedback on SPIL priorities.
5. Provide input on drafts of the SPIL.

An Interesting Fact...

The **SILC cannot provide any direct services except referring** someone to their local CIL.

- So if your SPIL addresses service needs for your state, **the CILs provide those services.**
- **Are your CILs reporting on their progress related to SPIL goals?** You don't need full reports of everything they've done, but **you must be reviewing and evaluating the implementation of the SPIL.**

What Things are Part of the SPIL?

- The Network's priorities for the next three years in their services, advocacy, outreach, and collaboration.
- The agreed way the DSE will operate and oversee Part B funding.
- The optional authorities the SILC plans to perform: Working with the CILs, Resource Development, Advocacy.
- The places CILs serve consumers, including any expansion.
- How the Network would like to expand services to unserved and underserved communities.
- How funding for IL will be spread across the network.

Section 1: Goals, Objectives, and Activities

- 1) Defines the mission of the SPIL.
- 2) Identifies the goals of the SPIL.
- 3) Describes the objectives and activities that the IL Network in the State will be working toward over the timeline of the SPIL.
- 4) Identifies how the Evaluation of the SPIL will be done.
- 5) Identifies the financial resources that are known to support the work of the IL Network and the SPIL.

What This Means:

- This section gives the major direction of what the IL Network wants to accomplish.
- It shows how we will know if we are successful in the evaluation.
- It shows how the work of IL is funded in your State.

Section 2: Scope, Extent, and Arrangement of Services

1. Identifies the services that will be delivered across the state by the CILs
2. Defines the outreach that will be completed to unserved and underserved populations
3. Identifies the coordination with other programs and organizations

What This Means:

- What IL services will the CILs be providing to individuals in your State.
- Who in your State is unserved and underserved, and how will you try to reach them.
- What partners you are planning to work with and why.

Section 3: Network of Centers

1. Identifies all current CILs, funding sources, and oversight entities
2. Describe the plans for the expansion and potential adjustment of the network
3. Discussed how funds are distributed
4. Addresses what happens if a CIL closes
5. Plans for changes to Center service areas and/or funding levels to accommodate expansion and/or adjustment of the Network.
6. Lists counties/areas assigned to (or removed from) CILs

What This Means:

- Who are the CILs in your State.
- Where do they serve people.
- How will they be funded.
- What happens if there's changes to funding.
- How will the network grow.

Section 4: Designated State Entity

1. Lists the responsibilities of the DSE
2. Describes the process for distribution and granting of funds
3. Describes the oversight process
4. Lists the administrative and staffing support

What This Means:

- What will the DSE do to support the network.
- What does the DSE do to oversee any of the funds they are distributing.
- How will they distribute the funding.

Section 5: Statewide Independent Living Council

1. Describes how the SILC is established and autonomy is ensured
2. Addresses how the SILC resources plan is developed
3. Describes how the SILC will be maintained over the course of the Plan

What This Means:

- How is the SILC structured
- How will the SILC be funded and operate.
- What work will the SILC be doing.

Section 6: Legal Basis and Certifications

1. Identifies the DSE agency
2. Identifies the SILC
3. Identifies all CILs eligible to sign the Plan
4. Affirms that the entities have the legal ability to participate and carryout the Plan

What This Means:

- What organization is the DSE.
- What is the information about the SILC.
- What CILs can sign the SPIL.
- Can everyone legally participate in the work of the SPIL.

Section 7: DSE Assurances

1. Lists all the Assurances the DSE agrees to follow
2. DSE Director signs agreeing to the assurances and to fulfill the role of DSE

What This Means:

- The DSE agrees to serve in the role of the DSE and follow the assurances.
- The DSE Director signs that their organization will be the DSE.

Section 8: SILC Assurances and Indicators

1. Lists all the assurances and indicators of minimum compliance that the SILC agrees to follow
2. Identifies the SILC chairperson to sign the SPIL
3. SILC Chairperson signs agreeing to the assurances and indicators

What This Means:

- What the SILC is agreeing that they will follow.
- Who is the SILC Chairperson.
- SILC Chairperson signs agreeing the SILC will do what the SILC is supposed to do.

Section 9: Signatures

1. The SILC Chairperson signs agreeing to the content of the Plan.
2. The CILs sign agreeing to the content of the plan
3. At a minimum 51% of CIL directors must sign the Plan

What This Means:

- Who in the Network is agreeing to the work of the SPIL.
- A majority of the CILs must agree.

Public Input

Public Input for the SPIL

The federal regulations on the SPIL and the SILC Indicators lay out the following requirements the SILC must follow to get public input on the development of the SPIL.

- **Public Input Is the First Step:** You must receive public input from individuals with disabilities and other stakeholders throughout the State **before** the SPIL can be developed.

Public Input for the SPIL (cont.)

Public Allowed to Attend All SPIL development meetings:

- The SILC must allow the public to attend all meetings on SPIL development.
- When the SILC has a SPIL meeting where they ask for input from the public, certain rules must be followed.
- The SILC must follow both federal and state rules to provide advance notice of these meetings.

Public Input for the SPIL (cont.)

Physical, Digital, and Communication Access Is Important:

- Public meeting locations, where public input is being taken, must be accessible to all people with disabilities, including, but not limited to:
 - proximity to public transportation
 - physical accessibility, and
 - effective communication and accommodations that include auxiliary aids and services, necessary to make the meeting accessible to all people with disabilities.
- Materials available electronically must be 508 compliant and, upon request, available in alternative and accessible formats, including other commonly spoken languages.

Who Should Be Included?

- Public
- People with Disabilities
- CILs and their consumers
- Other IL service providers
- Other community-based organizations that support community life for persons with disabilities
- Entities carrying out other programs providing services for persons with disabilities

Before Submission

Public Allowed to Comment on State Plan Draft Before It's Finalized

- The public must have an opportunity to comment on the State plan before its submission. You must accommodate people with disabilities as part of this process.
- You can **hold a public meeting before a draft is prepared AND allow public comment before the draft is submitted.**
 - Public Meeting Requirements:
 - Accessible & Appropriate 30-Day Notice (Notices must be provided in alternative accessible formats by request)
 - Posting public notice via media such as websites, newspapers, public service announcements, and contact with appropriate constituency groups.

During SPIL Evaluation

The SPIL is required to include a “SPIL Evaluation Plan.” SPIL must include a plan for evaluation of its effectiveness in meeting its objectives and a plan for evaluation of satisfaction by individuals with disabilities. The SPIL Evaluation plan includes several elements, but today we are going to focus on two important components. How the SILC will:

- Measure consumer satisfaction– this is separate from the CIL’s responsibility to measure consumer satisfaction but may be done in collaboration with the CILs
- Include a method to gather input from stakeholders (targeted populations, CILs, etc.) and the public
- ***The SPIL Evaluation plan is not intended to be used to evaluate CIL services and/or compliance with CIL standards and assurances***

SILC Interaction with Consumers

- **Stay in your lane!** Keep in mind that SILCs do not provide independent living services or individual advocacy. When requests come up, be prepared to refer them to their local CIL.
- **Ensure accessibility for all:** The SILC is required to ensure all public input events are accessible for people with disabilities and those with limited English proficiency. Plan and budget for the cost of accommodations and translations. Create a process and timeline for the public to request reasonable accommodations to participate.
- **Be in listening mode:** Often, consumers and advocates will use the public comment process to discuss their individual situations and needs. Ensure you refer to CILs, the CAP program, etc. Look for trends that may indicate larger systemic issues to be addressed.

SILC Interaction with Consumers (cont.)

- **Get Creative--Allow People to Respond in Different Ways:** Keep your community/culture in mind when developing ways for the public to provide input. Consider asking the same questions but allowing folks to respond in different methods (digital survey, paper survey, in-person, small groups, etc.)
- **Be Prepared to Retain Records of Responses**

Ways of Gathering Feedback and Input

These Will Vary Based on Community Preference

Survey

- Paper
- Digital (Links and QR codes)
- Survey Monkey is low-cost and generally accessible

Live Polling of Audiences

- Allows for instant feedback and audience

Hosting Townhalls or “Listening Sessions”

- Try partnering with CILs to co-host these sessions
- Consider allowing remote access
- Ask local advocacy groups to partner

Host focus groups (or small discussion groups)

Understand the Community

- Input gathering and public comments can come from a variety of ways.
- Know how unserved and underserved communities are connecting with others.
- Identify partners that can share input opportunities.
- Look outside of your immediate network.

CIL Engagement

- The CILs each have their own outreach plans.
- See what CILs have the best success in gathering consumer feedback.
- Have Network discussion on how that example can be a best practice for gathering SPIL input.

Important things to Remember about the SPIL

The Mission

- The Mission statement of your SPIL is the highest-level outcome you want to see in the long-term.
- All of the work in the SPIL should fit within that mission.
- It should be concise but a visionary statement.
- It should be aligned with the purpose of Title VII.

Goals and Objectives

- **The SPIL goals** set by the IL network are more long term and must be measurable – you must be able to determine when they are completed. Objectives are steps of progress toward larger goal.
- Even when the goal is too broad to measure you must be able to show progress toward accomplishing it. This may be broken down into steps – objectives - with **indicators** that show success.
- **You must know who is responsible** to know who will report on progress.
- You must have a method for the SILC to review and evaluate the process on the SPIL.
- If SPIL goals relate to core services, the CILs will need to provide the information needed to review and evaluate.

Indicators

- Measurable objectives include indicators – **information that tells you if you are being successful** in achieving the objective, and how you will know how fully the objective is being achieved. Indicators are required in your SPIL. Detail of the activities are optional.

Evaluation

Make sure your Evaluation Plan includes all these requirements

- Measure consumer satisfaction– this is separate from the CIL's responsibility to measure consumer satisfaction but may be done in collaboration with the CILs
- Incorporate information from the CILs' most recently available Program Performance Reports (PPRs)
- Include a method to gather input from stakeholders (targeted populations, CILs, etc.) and the public
- Identify the means by which progress will be measured
- Identify timelines by which progress will be measured

Evaluation (cont.)

- Break down specifics as much as you need to so that the network parties are clear on who does what.
- The SPIL Evaluation plan is not intended to be used to evaluate CIL services and/or compliance with CIL standards and assurances in section 725 of the Act.
Compliance by CILs receiving Part C funds is the responsibility of the ACL/OILP.
Compliance of CILs receiving Part B funds for general operations is the responsibility of the DSE with respect to the Part B funding.
- The SPIL Evaluation plan is intended to measure how well the activities in the plan make progress in achieving the objectives and subsequently the goals and mission.

Expansion and Adjustment of the Network

- Section 3.2 is a critical section.
- Understand the current funding and reach of the CILs but consider the possibilities.
 - Your network can agree about funding increases or decreases in the SPIL so that everyone knows what will happen if it comes.
- Have the hard discussions about what happens if a CIL closes.
- Laying out an agreement in funding can help resolve future issues in the network.

Emergency Response Coordination as an Authority in Your SPIL

Many SPILs include this, typically that the **CILs will work with the SILC** to establish state-wide **emergency response coordination** to better reach and support individuals with disabilities residing in identified unserved counties.

Advocacy as an authority in your SPIL

This is the **most common authority**, as advocacy is such an important part of Independent Living.

Do you know how advocacy is different from lobbying, which is not allowed with federal funds or by you in your official council member role?

SILC Process for the SPIL

The regulations lay out the requirements the SILC must follow to get public input on the development of the SPIL. **Indicators provide greater detail.

At a minimum, the SILC must have document that you've followed your written process for:

- The SPIL development process
- How information is collected and used in SPIL development
- How input is gathered from the CILs
- How input is gathered from people with disabilities

YOU SHOULD HAVE A CURRENT APPROVED SPIL. IF YOU FEEL YOUR PROCESS NEEDS TO BE IMPROVED, DECIDE ON THAT NOW! THE NEXT ONE IS ONLY TWO YEARS AWAY!

Resources for Additional Guidance:

- [The Rehabilitation Act](#)
- [SILC Indicators and SILC and DSE Assurances](#)
- [Independent Living Regulations](#)

The IL T&TA Center offers a growing collection of training recordings, tools, templates, and publications to support Statewide Independent Living Councils (SILCs). Explore these resources to find guidance and tools that best support your Council's work.

- [IL T&TA Resource Library for SILCs](#)
- [IL T&TA SILC Connections](#)

Evaluation

Thank you for participating in this session.

Your feedback is important and helps us plan future training.

Please use the link in the chat to share your feedback.

[Evaluation Link:](#)



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Website: www.ILTTACenter.org

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Call: 406-243-5300 and someone will get back to you as soon as we can.

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IL T&TA Center Attribution

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Independent Living

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This project is on assignment through contract with the Administration on Disabilities, Administration for Community Living, Health and Human Services.

About the IL T& TA Center

The Independent Living Training and Technical Assistance Center (IL T&TA Center) is available to you through a contract with the US Department of Health and Human Services.

The IL T&TA Center provides expert training and technical assistance to CILs, SILCs, and DSEs.

The Center is operated by the University of Montana's Rural Institute for Inclusive Communities.

