IL T&TA

Independent Living

Training & Technical Assistance Center

State Plan for Independent Living

Planning & Development Guide

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Introduction and Purpose

This guide is for Statewide Independent Living Councils (SILCs) and state Independent Living (IL) Networks to effectively plan, prepare, and draft the State Plan for Independent Living (SPIL).

The guide is a companion tool to support the federally approved SPIL Instrument and Instructions and **should not be used to replace the instructions**.

Under those instructions, you will find peer-provided advice collected from the SILC peer network that shares drafting tips, common pitfalls, and even example templates.

How to Use this SPIL Guide as A Companion Tool

- **Use it as a writing tool.** When drafting each SPIL section, this guide, when used with the SPIL instructions, can help ensure that all the required information is included in the SPIL.
- **Use it as a review tool.** Compare a draft SPIL against the SPIL Development Optional Checklist (Appendix A in the SPIL Instrument and Instructions). Identify and address missing required information and decisions, clarify unclear language, and review each of the SPIL sections to determine if any areas may need more work.
- **Use it as a facilitation tool.** Take the review questions in this guide to SILC/CIL workgroups to help make decisions before the final drafting stage.
- Download the SPIL Instrument and Instructions.

This companion tool is meant to assist the SILC and IL Network in better understanding the SPIL instructions and requirements, provide technical assistance in creating a complete and compliant SPIL, and ensure the Independent Living Philosophy is incorporated into SPIL planning and development.

Important Concepts

Every SPIL must include certain specific details and requirements as listed in the SPIL Instrument and Instructions. This guide will also help to ensure that additional concepts that reinforce the IL Philosophy and the purpose of Title VII are also included.

- **Center for Independent Living (CIL)** Designed and operated by individuals with disabilities, Centers for Independent Living (CILs) provide independent living services for people with disabilities. CILs are at the core of ACL's independent living programs, which work to support community living and independence for people with disabilities across the nation based on the belief that all people can live with dignity, make their own choices, and participate fully in society. These programs provide tools, resources, and support for integrating people with disabilities fully into their communities to promote equal opportunities, self-determination, and respect.
- **Consumer control and disability leadership.** The SPIL should reflect the IL philosophy and demonstrate that people with disabilities were the primary drivers of shaping the SPIL priorities. People with disabilities must have meaningful roles in developing the SPIL from the first step to the very last.

- **Statewideness.** The SPIL should explain how the IL Network will provide IL services statewide to the greatest extent possible and how it will address unserved and underserved areas and populations.
- **Outcome-focused.** SPIL Goals and objectives should describe the changes the IL Network wants to achieve, not only the activities it will complete.
- **Funding clarity.** The SPIL should explain funding amounts, sources, uses, distribution methods, and what happens to allowable carryover funds under increased, reduced, one-time, relinquished, or unspent conditions, or reallocated funding.
- **Accountability.** The SPIL should identify responsible parties, timelines, data sources, evaluation methods, and when amendments will be considered.
- **The IL T&TA Center or your Office of Independent Living project officer can answer specific questions about SPIL requirements and provide additional information.**
    - State Plan for Independent Living (SPIL) Fundamentals is an eCourse you can complete to learn more about the SPIL.
    - SPIL 101 is a training you can view that reviews the SPIL in detail.

SPIL Development, Public Input, and Submission Process

Information to Prepare / Plan for and Document

Expect ACL to reach out to obtain the following information, if it's not included in your SPIL submission:

- Describe the development process used before drafting and before submission.
- Show how and where public input and stakeholder feedback were gathered to develop the goals, and how it was analyzed and used throughout the SPIL development process.
- Document CIL director involvement and agreement.
- Prepare for timely submission and acquire the required signatures.
- Document adherence to the SILC written policies and procedures for receiving public input, specifically from individuals with disabilities.
- Keep a record of public notices, attendance, accommodations, comments, and responses.
- For additional information on the SILC requirements to document their process regarding SPIL development, you can access the IL T&TA Center SILC Assurances & Policies and Procedures Training.

Drafting Tips

- Build the development timeline backward from the submission deadline.
- **Gather input from people with disabilities before drafting**, not only after a draft is complete.

- Use multiple accessible input methods, including virtual, in-person, surveys, focus groups, and targeted outreach approaches, particularly for unserved and underserved populations.
- Plan ahead to create in-person events that are inclusive and accessible for a wide variety of disabilities, cultures, and participants. For example, ensure that any language access has been planned for, and that language translation can be provided when needed. Check out this resource to help with planning indoor and outdoor events—it includes accessibility considerations, such as surveys for event attendees, and ways to find more information, guidance, and resources. Community Assessment for Accessible Rural Events Toolkit | University of Montana
- Track themes, decisions, and where feedback changed how something was drafted in the SPIL.

Review and Documentation Worksheet – SPIL Development Planning & Public Input

Review and Documentation Questions	Notes / SPIL Language / Changes / Decisions
Has the SILC documented who participated in the SPIL development and when / how?	
How was / will input gathered from individuals with disabilities throughout the State be reviewed and analyzed before drafting?	
Was a draft of the SPIL available for public review and comment before its submission to ACL? **When and how?**	
Does the SPIL reflect how feedback influenced goals, objectives, priorities, services, outreach, and IL network expansion?	
Did the SILC keep records and documentation about the information gathered from the public (specifically	

from people with disabilities) and how it influenced the drafting of the SPIL?	

Information for the SILC: To Maintain and Keep

- Public input notices, agendas, minutes, attendance/sign-in lists, recordings, or transcripts, where available.
- Survey results, focus group summaries, public comments received, and responses to feedback summaries.
- SPIL committee or workgroup rosters and CIL director meeting and email records reflecting collaborative engagement pertaining to SPIL development.
- Final sign-off records from SILC chair and at least 51% of CIL directors.

Common Mistakes and Pitfalls to Avoid

- Treating public input as a performative checkbox after the SPIL is drafted / complete.
- Collecting public comments but not explaining or sharing information around how they were considered, or how their thoughts/input were incorporated in the SPIL.
- Conducting inaccessible meetings and not providing accessible materials.
- Waiting until June or the end of the SPIL drafting to resolve CIL directors' disagreements or DSE signature issues.

Sections of the SPIL

Executive Summary

SPIL Instructions

Concisely summarize the SPIL. Do not include anything that the SPIL's other sections do not include. An appropriate length for the executive summary is 1-2 pages.

Explanation

The purpose of the **Executive Summary** is to concisely summarize the SPIL without introducing new commitments or information that does not appear in the body of the Plan.

Reminders and Requirements

- Summarize the SPIL mission, goals, supporting objectives, IL network priorities, funding approaches, and implementation/evaluation structure.
- Keep the summary brief and aligned to the final SPIL.

Drafting Tips

- Write the Executive Summary section last.
- Use plain language and avoid repeating every detail.
- Highlight major statewide issues, planned outcomes, and strong, measurable indicators, so the IL Network knows whether progress is occurring or has occurred.
- Do not include priorities or funding uses that are not included in later sections.

Review Worksheet – Executive Summary

Review Questions	Notes / SPIL Language / Changes / Decisions
Does the Executive Summary match the rest of the SPIL?	
Does it clearly explain the mission and major direction of the IL Network for the three-year SPIL period?	
Does it avoid new priorities that are not addressed elsewhere in the SPIL?	
Would a person unfamiliar with the SPIL understand the major priorities for the IL Network after reading it?	

Common Mistakes and Pitfalls to Avoid

- Writing the executive summary first or not updating it after drafting the SPIL.
- Including inspirational but unmeasurable goals/objectives/priorities.
- Overloading the Executive Summary with technical jargon and detail.

Section 1: Mission, Goals, Objectives, and Activities

The purpose of the **Mission, Goals, Objectives, and Activities** section is to:

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

In the **Mission, Goals, Objectives, and Activities** section, you will answer the following questions:

- What is the major direction of what the IL Network wants to accomplish?
- How will you know if you are successful through the evaluation of your progress?
- How is the work of IL funded in your State?

Section 1.1: Mission

SPIL Instructions

In developing the mission statement, keep in mind this is the mission of the IL Network in your State, and the SPIL is the vehicle to address it. The mission is the highest outcome in the long term, and the SPIL goals and objectives should all be aiming toward achieving this mission.

Explanation

The purpose of the **Mission** section is to state the long-term outcome that the state Independent Living Network is working toward through the SPIL.

Reminders and Requirements

- A mission statement for the IL Network and the SPIL; this is not the mission of individual organizations that make up the IL Network.
- There should be a clear connection to independent living, consumer control, full inclusion, and access to community life.

Drafting Tips

- Keep the mission broad enough to cover the full three-year Plan but specific enough to reflect IL values.
- Avoid making the mission a list of activities.
- Use the mission as the anchor for goals, objectives, evaluation, and funding.
- Consider checking the draft mission statement against the purpose statement of Title VII of the Rehab Act to ensure alignment with the IL philosophy.

Review Worksheet

Review Questions	Notes / SPIL Language / Changes / Decisions
Does the mission reflect the IL philosophy?	
Is it written as an outcome rather than an activity?	
Can each goal and objective be reasonably connected back to the mission?	
Is it clear that this is the mission of the IL Network and SPIL, not the SILC or DSE?	

Common Mistakes and Pitfalls to Avoid

- Using agency-specific language instead of IL network-wide language.

- Writing a mission that is too long to guide decisions.
- Leaving out themes associated with consumer control, equal access, community inclusion, or systems advocacy.

Section 1.2: Goals

SPIL Instructions

Goals are the intermediate outcomes, what you want to achieve, that build toward the mission.

Explanation

The purpose of the **Goals** section is to identify the intermediate outcomes the IL Network intends to achieve during the three-year SPIL period.

Reminders and Requirements

- Goals for the three-year period of the Plan.
- Goals that build toward the mission and organize the objectives.

Drafting Tips

- Use a small number of meaningful goals in which progress can be measured and achieved in a three-year period.
- Write goals as outcomes, not tasks.
- Make sure each goal has at least one measurable objective in Section 1.3.
- Avoid duplicating SILC or individual CIL work plans.

Review Worksheet

Review Questions	Notes / SPIL Language / Changes / Decisions
Are the goals achievable within the three-year SPIL period?	
Do the goals reflect statewide priorities identified through public input and data?	
Do the goals set clear objectives and evaluation measures?	
Are the goals broad enough to allow multiple strategies but focused enough to measure/evaluate?	

Common Mistakes and Pitfalls to Avoid

- Too many goals (more than four (4) goals is likely too many for the three-year SPIL period).
- Goals that are actually activities.

- Goals that reflect organizational priorities rather than statewide, IL network priorities driven/shaped by input from people with disabilities.
- Goals that lack connection to funding or responsible parties.

Section 1.3: Objectives

SPIL Instructions

Objectives are specific outcomes – the changes you want to result from what you do – that build toward the achievement of a goal. Objectives should be outcomes focused, measurable, and have timelines/target dates. Objectives may include specific amounts and sources of funding to be used for an objective or activity.

Be realistic with objectives, and do not include more than can be achieved in the 3-year period of the Plan. Do NOT include all the CILs work-plan objectives–the SPIL and the CIL work plans should work together but not duplicate each other.

Outcomes vs. Outputs – Outputs reflect how much was done, quantity of work, numbers of activities, etc. Outcomes reflect the changes that occurred as a result of the work done.

Outputs are how much work is done:

- *number of people served*
- *number of hours of service*
- *number of activities conducted*
- *number of public service announcements*

Outcomes are the changes or results you want:

- *changes in individuals (knowledge, skills, etc.)*
- *changes in organizations (attitudes, programs, etc.)*
- *changes in communities (attitudes, accessibility, etc.)*

Measurable objectives include indicators–what information will tell you if you are being successful in achieving the objective–how you will know how fully the objective is being achieved.

*Indicators should be **S**pecific, **M**easurable, **A**chievable, **R**elevant, **T**imely (SMART).*

- *Specific – clear what exactly is being measured*
- *Measurable – necessary information can be gathered with reasonable amount of effort and cost*
- *Achievable – somewhere between too easy to achieve and hopelessly out of reach*
- *Relevant – captures the core essence of the desired outcome*
- *Timely – likely to move/change enough during the three-year period of the Plan to provide useful information*

Appendix B (In the SPIL Instructions) contains planning tools that may be useful in developing the goals and objectives.

<u>Examples</u>:

Mission: *"(state)ians with disabilities participate fully as they like in community activities."*
Or
"(state)ians with disabilities are valued equally and participate fully in their communities."

Goals: *1. Individuals with disabilities live independently in the community.*
2. Formerly underserved populations are served by CILs.

Objectives: *1.1 Individuals with disabilities have access to transportation.*
1.2 Individuals with disabilities have access to the community-based resources they need.
2.1 CIL services are available in _____ county(ies).
2.2 Hispanic individuals with disabilities have access to CIL services.

Indicators: *1.1 Availability of accessible transportation increased by ___%.*
1.2 Community-based resources available increased by ___%. OR Waiting list for _____ Waiver was eliminate/reduced by ___%.
2.1 _____ CIL provided services in _____ county(ies).
2.2 All CIL materials are available in Spanish and Spanish speaking staff is available during all business hours.

NOTE: When developing your logic model, it will be helpful to include the activities planned to achieve each objective–BUT you are not required to include activities in the SPIL for submission to ACL/OILP.

Explanation

The purpose of the **Objectives** section is to state measurable outcomes, geographic scope, target dates, measurable indicators, and compatibility with the Title VII purpose.

Reminders and Requirements

- Objectives for the three-year SPIL period.
- Geographic scope.
- Desired outcomes.
- Target dates.
- Measurable Indicators used to identify progress.
- Compatibility with the purpose of Title VII, Chapter 1.

Drafting Tips

- Use SMART indicators: specific, measurable, achievable, relevant, and timely.
- Separate outputs from outcomes. Outputs are typically activities that show how much was done; outcomes show what changed. "Outcome Measurement Toolkit: A Resource for Centers for Independent Living" can assist in developing objectives.
- For each objective, identify the data source and who will collect it. It is important to understand how to gather data and information.
- Include timelines that allow mid-course correction before the three-year SPIL period ends.
- Do not include every CIL work plan activity. Focus on IL network-level outcomes.
- The SPIL Instructions Appendix B



Review Worksheet

Review Questions	Notes / SPIL Language / Changes / Decisions
Does each goal have at least one measurable objective?	
Does each objective identify the outcome / change expected?	
Is the geographic scope clear?	
Are target dates included?	
Are the indicators realistic and measurable using the available data?	
Can the evaluation plan in Section 1.4 measure these objectives?	
Does the financial Plan in Section 1.5 support these objectives?	

Common Mistakes and Pitfalls to Avoid

- Using vague verbs such as support, enhance, or promote without a specific measurable indicator.
- Confusing activities and outputs with outcomes.

- Including objectives without baseline data or a feasible data source or knowing if the data can be collected.
- Writing objectives that require basic funding not included in the financial Plan.

Section 1.4: Evaluation

SPIL Instructions

Describe the method(s) that will be used and the timelines for periodically evaluating the effectiveness of the Plan in meeting the objectives established in section 1.3 and achieving the desired outcomes. The description must include the SILC's evaluation of satisfaction by individuals with significant disabilities who have participated in the Independent Living services and/or CIL services. The Evaluation should be outcomes focused and should measure progress toward achieving objectives, goals, and mission. Measurable objectives, indicators, target performance levels, and target dates will facilitate the development and implementations of the SPIL Evaluation plan.

The SPIL Evaluation plan should describe 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*
- *incorporate information from the CILs' most recently available Program Performance Reports*
- *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*

Explanation

The purpose of the **Evaluation** Section is to detail how the SILC will monitor, review, and evaluate SPIL implementation and satisfaction of individuals with disabilities.

Reminders and Requirements

- Evaluation methods and processes to be used in SPIL monitoring.
- Timelines for evaluation and the data to be collected.
- Evaluation of satisfaction of individuals with significant disabilities who participate in IL services and/or receive CIL services.
- Use of CIL Program Performance Report (PPR) information/data and stakeholder public input where appropriate.

Drafting Tips

- Evaluate the SPIL, not CIL compliance.
- Connect every evaluation measure back to Section 1.3 objectives.
- Include consumer satisfaction methods **distinct from each CIL's own satisfaction process, even if data collection is coordinated.**
- Define how evaluation results will be reviewed and when amendments or corrective strategies will be considered.

- Use quarterly, semiannual, and annual checkpoints depending on what you are evaluating. Remember, you are setting up the monitoring schedule with the network, and different objectives may need to be reviewed more or less frequently.
- Review the timelines as a calendar to share with the network so that everyone can understand the scope and requirements.

Review Worksheet

Review question	Notes / SPIL language/decision
Does the evaluation plan include a detailed description of how the SILC will measure progress toward achieving the SPIL's mission, goals, and objectives?	
Does it identify who collects data, how, and when?	
Does the Plan describe how the SILC will evaluate the satisfaction of CIL or IL services for consumers?	
Does it include PPR data and stakeholder input?	
Does the Plan appear to monitor CIL compliance or activities? If so, adjust Plan to ensure it focuses only on measuring the progress and effectiveness of the SPIL, not on individual IL network organizations.	
Does it explain how results will be used to adjust implementation?	

Common Pitfalls to Avoid

- Evaluating CIL compliance instead of SPIL progress.
- Only evaluating at the end of the three-year Plan.
- No clear person or entity is responsible for data collection.
- No process for acting on evaluation findings.
- Not ensuring that data and information are being collected, or collected consistently, across the network.

Section 1.5: Financial Plan

The purpose of the **Financial Plan** section is to summarize the sources, amounts, and uses of federal and non-federal funds that will support SPIL goals and objectives, and describe processes for grant and contract administration, grantee selection, and fund distribution.

SPIL Instructions

Describe the financial Plan for the use of Federal and non-Federal funds to meet the objectives identified in the SPIL. The financial Plan is a summary of the anticipated sources, amounts, and proposed uses of funds in the above table to support the SPIL objectives. It is not a detailed budget.

Reminders and Requirements

- Sources and uses of funds.
- Coordination of funding to accomplish SPIL goals and objectives.
- Process for grants/contracts and selection of grantees.
- Distribution of funds to facilitate effective operations and services.
- Narrative explaining how projected funding supports the Plan.
- Highlight any funding that will be used or needed to complete the goals and objectives of the SPIL.

Drafting Tips

- Treat this as a financial summary of expected funding, not a line-item budget or a wish list.
- Describe the purpose of the funding and the intent of why the funding will be used.
- **Include Part B, Part C, Innovation and Expansion, Social Security reimbursement, state funds, match, and other funds that support Independent Living, where applicable.** Make sure the financial Plan supports objectives in Section 1.3. An example of match calculation can be found on page 14 of the SPIL Instrument and Instructions.
- Flag significant deviations from the projected Part B financial plan early because a substantial amendment may be required if deviations are large.
- If the SILC Resource Plan uses more than 30% of Part B, include the required justification in Section 5.2.
- Ensure the DSE administrative amount does not retain more than 5% of the Title VII Part B funds for administrative costs in a fiscal year.
- Title VII (7) of the Rehabilitation Act and Funding Explained is a helpful eCourse that can assist in understanding the different funding sources included in the SPIL.
- Include information about what will happen if funding in one year has not been fully spent, including how those funds will be utilized in the following fiscal year.

Review Worksheet

Review question	Notes / SPIL language/decision
Do all objectives with costs have identified funding support?	

Review question	Notes / SPIL language/decision
Are Part B uses clear across SILC resource plan, IL services, CIL operations, other SPIL activities, and DSE administration?	
Is state match calculated and documented?	
If the DSE does not have the authority to issue I&E funds, does the narrative include an explanation and/or description of how it will coordinate with the VR agency?	
Do grants/contracts have the selection processes described?	
Does the narrative explain the coordination of funding sources?	
Are funding assumptions realistic for each year of the SPIL?	

Common Pitfalls to Avoid

- Using the financial table without a narrative that explains why funding is being used.
- Listing funds that are not actually available or committed.
- Funding objectives are inconsistent with Section 1.3.
- Failing to describe grant/contract selection and distribution processes.

Section 2: Scope, Extent, and Arrangements of Services

The purpose of the **Scope, Extent, and Arrangements of Services** section is to:

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

In the **Scope, Extent, and Arrangement of Services** section, you will answer the following questions:

- 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 are you planning to work with and why?

Section 2.1 Services

SPIL Instructions

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 1.3 of this SPIL, and whether the services will be provided by the CILs or by the DSE (directly and/or through contract or grant) or other entity.

Explanation

The purpose of the **Services** section is to describe IL services available to individuals with significant disabilities, including geographic scope, eligibility, statewide reach, and which entities provide services using Part B or other funds.

Reminders and Requirements

- Services to be provided.
- Identification of whether services are provided using Part B and/or other funds.
- Identification of service provider entity: CIL, DSE, or other entity.
- For CILs providing services in multiple states, contact your PO for assistance in completing this section.

Drafting Tips

- Use the service table to show the full array of core and other IL services.
- Make sure all core IL services are included.
- Attach or reference a service area map if helpful.
- Review the instructions of the annual Program Performance Report for a list of definitions of “other independent living services.”

Common Pitfalls to Avoid

- Not checking with each CIL to determine which IL services they provide in each geographic area.

Section 2.2 Outreach to Unserved and Underserved Populations

SPIL Instructions

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

Explanation

The purpose of the **Outreach to Unserved and Underserved Populations** section is to describe outreach to populations and geographic areas that are unserved or underserved, including:

1. minority groups,
2. rural or urban underserved areas,
3. limited English proficiency populations,
4. and others identified through state data and public input.

Reminders and Requirements

- Identification of specific unserved and underserved populations and groups.
- Outreach methods.
- How will outreach improve access to IL services?
- Connection to goals, objectives, and service delivery.
- This information is separate from the CIL's own Outreach Plan within their work plans.

Drafting Tips

- Use data and community input to define and prioritize target populations. You can use the resources at Disability Counts - An RTC: Rural Product to help you find population data.
- Avoid generic statements such as "we will reach underserved populations" without naming groups, geography, strategies, and expected results.
- Include accessible, culturally responsive, and language-accessible outreach methods.
- **Explain how outreach will be tracked and how results will feed into the evaluation of the effectiveness of the SPIL**.

Review Worksheet

Review question	Notes / SPIL language/decision
Which populations are unserved or underserved?	
Does this section explain how unserved and underserved is determined? Do these definitions correspond with definitions used in Section 3.2?	
Did your SPIL specify minority groups, as well as rural and urban populations?	
Which geographic areas need targeted outreach?	
What outreach activities will be used?	
Who is responsible for conducting outreach?	
How will the network track outreach and conversion to service access?	

Review question	Notes / SPIL language/decision
How will materials and methods be accessible and culturally responsive?	

Common Pitfalls to Avoid

- Naming every possible population without priorities.
- **No data source for underserved determinations.**
- No link between outreach and services.
- Not being able to explain how or why you have made the decision on who is unserved and underserved in the SPIL.
- Counting only events without assessing whether access improved.

Section 2.3 Coordination

SPIL Instructions

Describe plans for coordination and cooperation between the SILC, CILs, and DSE and with other entities, programs, organizations. Include specific methods and efforts for each entity included.

Explanation

The purpose of the **Coordination** section is to describe coordination with programs, organizations, and systems that affect the independence and full community participation of individuals with significant disabilities.

Reminders and Requirements

- Coordination activities with other federal, State, local, and community programs.
- How does coordination support SPIL goals and services?
- Roles of SILC, CILs, DSE, and partners directly related to SPIL goals, objectives, and activities.

Drafting Tips

- Identify coordination that directly supports SPIL objectives, goals, or outreach plans.
- Identify specific systems or partners rather than only broad categories.
- Describe how coordination will produce benefits such as improved referrals, systems change, resource sharing, or reduced barriers.
- Include coordination with other ACL or HHS grantees, VR, housing, transportation, Medicaid/HCBS, aging, developmental disabilities, education, workforce, emergency management, and advocacy coalitions where relevant.

Review Worksheet

Review question	Notes / SPIL language/decision
What coordination is necessary to implement the SPIL?	
Which partners are essential?	
What is each partner's role?	
How will coordination be documented?	
How will coordination improve outcomes for individuals with disabilities?	

Common Pitfalls to Avoid

- Long lists of partners with no purpose.
- Coordination that does not connect to SPIL objectives or outreach.
- No process for maintaining partnerships or measuring results.

Section 3: Network of Centers

The purpose of the **Network of Centers** section is to:

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

In the **Network of Centers** section, you will answer the following questions:

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

Section 3.1 Existing Centers

SPIL Instructions

List the CILs located in the State including:

- *Legal name of the CIL*

- *Geographic area/counties served by the CIL (full CIL services vs. limited services – for example, a program provided in areas not served by the CIL for core services or a satellite office of a CIL that provides the core services but not all of the services provided by the full CIL)*
- *Current sources of funding– not including amounts (Part B, Part C, State General Revenue, Other Federal, Other)*

Explain the criteria for defining the CIL network, bearing in mind that those CILs included in the network should be those eligible to sign the SPIL.

Explanation

The purpose of the **Existing Centers** section is to describe the existing statewide network of Centers for Independent Living and the geographic areas currently served.

Example:

Legal name	Counties served	Oversight process	Oversight entity	SPIL Signatory (yes/no)
		[DSE determines oversight process, which probably involves CIL submitting PPR to DSE]	DSE	
		CIL submits CIL PPR to ACL/OILP	ACL/OILP	
		CIL submits CIL PPR to ACL/OILP [and probably submits PPR to DSE]	DSE and ACL/OILP	

Reminders and Requirements

- List existing CILs with their legal name.
- Identify service areas by county, identifying where full services are provided or limited services.
- Identify, as a network, what full services or limited services are. (example: only a recreation program is provided in a county)
- Identify funding that the CILs use that is part of the Financial Table in Section 1.5, and the oversight process used for any of the funds that are included in the SPIL or used toward achieving the SPIL goals.

Drafting Tips

- Identify counties/regions served by each CIL.

- Make sure this section matches the Financial Plan and Section 3.2 expansion/adjustment language.
- Identify the difference between full services and limited services.

Review Worksheet

Review question	Notes / SPIL language / decision
Are all CILs listed accurately?	
Are service areas clear?	
Is the oversight process consistent with Section 4 and ACL's oversight process?	
Are all funding sources included in Section 1.5?	
Do all CILs agree to the meaning of full and limited services?	

Common Pitfalls to Avoid

- Including funding not connected to the Financial Plan in Section 1.5
- The CILs do not agree with a definition of full versus limited services.

Section 3.2 Expansion and Adjustment of the Network

SPIL Instructions

Provide a detailed description of the plans for expanding, building, and/or adjusting the statewide network of CILs based on increased funding, new funding, one-time funding, or cuts in funding, including but not limited to:

- *Definition of served, unserved, and underserved.*
- *Minimum funding level for a Center and formula/plan for distribution of funds to ensure that each Center receives at least the minimum.*
- *Priorities for establishment of new CIL(s).*
- *Action/process for distribution of funds relinquished or removed from a Center and/or if a Center closes.*
- *Plan to build capacity of existing CILs and/or expand statewideness by establishing branch offices and/or satellites of existing CILs.*
- *Plan/formula for distribution of new funds (Part B, Part C, one-time funds, etc.)*
- *Plan/formula for adjusting distribution of funds when cut/reduced.*
- *Plan for changes to Center service areas and/or funding levels to accommodate expansion and/or adjustment of the Network. State the needed change(s) as concretely and succinctly as possible. Include:*
    - *CILs included in the change*

- *New counties/areas assigned to (or removed from) involved CILs*
- *Changes in funding agreed upon or state "no funding changes needed."*

Explanation

The **Expansion and Adjustment of the Network** section is one of the most important SPIL sections for the IL Network's long-term planning. Your network can use this section to reach agreement on issues and topics that typically cause tension and disruption before they arise. The section should clearly outline how CILs are funded, what the network considers the minimum funding for a CIL, how to allocate any new funding that may come, how to manage any loss or reduction in funding, and what happens if a CIL closes.

This section includes some of the most important information for your network's future. Even if a situation isn't known now, like new and unexpected funding or a CIL closing, you should have serious conversations as a network about those possibilities while drafting the SPIL. ACL uses this section to guide how new or relinquished Part C funding should be allocated.

Definition of Served, Unserved, and Underserved

What geographic areas and populations are served, unserved, and underserved, and how those determinations will guide expansion and adjustment decisions. This may be the same as the information included in Section 2.2 or may be different, but you should note any differences.

Reminders and Requirements

- Definitions of served, unserved, and underserved.

Drafting Tips

- Be specific in how you define what served, unserved, and underserved mean when talking about CILs and IL Services.

Review Worksheet

Review question	Notes / SPIL language/decision
What does "served" mean in this State?	
Can an area be assigned to a CIL but still be underserved?	
Are there currently unserved areas in your State?	

Common Pitfalls to Avoid

- Only using the Part C award service areas as a definition of "served" may not reflect limits on CIL capacity in the area.

Minimum Funding Levels

Establish a minimum funding level necessary to fully support an effective CIL that makes sense for your network. Many factors can be incorporated into the process of developing a minimum funding level. What is important is for the IL Network to come together to determine the funding level needed to operate a CIL in your State and the steps that can be taken to work toward achieving that minimum funding level for all CILs. You also need to establish a minimum amount to start a new CIL (or CIL satellite/branch). Once a minimum level has been set, you can build up to the full minimum funding level. It is recommended that you include all funding sources outside of Part C when establishing these minimum funding levels, as Part C has limited flexibility due to statutory requirements.

Reminders and Requirements

- Minimum funding level for a CIL.
- Formula or plan to ensure each CIL receives at least the minimum.
- Funding sources are included in the calculation.
- Plan for new CIL, branch, or satellite start-up where applicable.

Drafting Tips

- Use a clear dollar amount or formula.
- Identify whether Part B, Part C, State, I&E, Social Security reimbursement, or other funds count toward the minimum.
- Calculate the gap between current funding and the minimum.
- Explain whether CILs below the minimum receive priority before expansion.
- Understand, as a network, what the minimum supports: core services, staffing, operations, outreach, administration, travel, data/reporting, and fiscal compliance.

Review Worksheet

Review question	Notes / SPIL language/decision
What is the minimum funding level for existing CILs?	
How many CILs are currently at or above the established minimum funding level?	
How many CILs are below the minimum?	
What is the total amount of funds needed to bring all current CILs to the minimum funding level?	

Review question	Notes / SPIL language/decision
What sources of funds are included in the minimum funding level?	

Common Pitfalls to Avoid

- Identifying a minimum that is not reflective of the network in your State.
- Clearly identifying what funding counts toward the minimum and connecting it to Section 1.5 Financial Plan.

Priorities for Establishing New CILs

The State Plan is the vehicle that determines the priorities and directs the funding for the statewide network of CILs. The Plan for developing new CILs and adjusting your network to cover the entire State, and ensure every individual with a disability has access to independent living services.

Reminders and Requirements

- Priorities for the establishment of new CILs.
- Order or criteria for geographic expansion.
- Whether expansion will occur through new free-standing CILs, satellites, branches, or spin-off models.
- Process for consumer and community input.

Drafting Tips

- State whether new CILs will be prioritized after existing CILs reach minimum funding, or under what conditions both can occur.
- Describe the ideal statewide network and the step-by-step path to reach it.
- Understand whether new CILs will be prioritized after existing CILs reach minimum funding, or under what conditions both can occur.
- Discuss if there will be a minimum amount for starting a new CIL.

Review Worksheet

Review question	Notes / SPIL language/decision
If minimum funding were available, where would the next CIL be established? Is the description specific to certain geographic boundaries?	
What is the minimum amount of funding to start a new CIL?	
What is the minimum amount of funding to start a CIL satellite?	

Review question	Notes / SPIL language/decision
How much funding will it take to open new CILs and fully implement your design for a statewide network of CILs?	
Are there existing CILs that are not funded by Part C funds in your State?	
If a new CIL is formed, what additional support will it need from your network?	

Common Pitfalls to Avoid

- Saying that no new CILs will be established without a reason or a lack of need for new CILs.
- Not factoring in a minimum amount to start a CIL.
- Having plans that do not consider the long-term stability of new CILs.

CIL Closure, Relinquishment, or Removal of Funding

All funding can be cut or reduced at any time due to state funding reductions, federal funding cuts, and reallocation after census data are incorporated into population distributions, or other factors that reduce the total funding available.

It is important to have conversations in the network and discuss how funding reductions will be handled before they occur. If a network had waited until funding reductions occurred, the resulting complications and tension could have been mitigated by having a solid plan in place.

Ensuring that a detailed plan, agreed by everyone, is in place for how funding cuts will be made/distributed may avoid confusion and hardship when cuts do occur.

Reminders and Requirements

- Action/process for the distribution of funds relinquished or removed from a Center and/or if a Center closes.
- Plan for continued access to services in the affected area. (Example: Where should ACL transfer funds in the event a CIL closes until a new award is made?)
- Process for recommending new grant competition, redistribution, temporary coverage, or new CIL development. (Note: ACL may require 1-2 years to post a forecast and a notice of funding opportunity for a new CIL award. Networks should plan accordingly.)

Drafting Tips

- Distinguish Part C funds, Part B funds, state funds, or other funds in Section 1.5.
- Address immediate consumer continuity and long-term network design.
- Include communication with ACL/OILP or DSE as appropriate.
- Set a timeline for network recommendations.

Review Worksheet

Review question	Notes / SPIL language/decision
Does your language include a clear direction and timeline on what will occur if a CIL closes, loses, or relinquishes funding?	
How would the network be impacted if IL services are no longer provided in a service area?	
Do current CILs have capacity to take on a new grant to cover the service area?	
Would a new CIL need to be formed for the service area to continue to be served?	
Does your network have additional options that they can consider?	
Does this section describe the criteria for re-competition or redistribution?	

Common Pitfalls to Avoid

- Only addressing the money and not consumer continuity.
- No temporary service plan.
- No criteria for re-competition vs redistribution.
- No timeline for network action.

Capacity Building of Existing CILs and Expansion Through Branches/Satellites

In planning for the expansion and adjustment of the network, the SPIL must address how increasing the current capacity of the CILs will be addressed. Many areas may be considered underserved in a CIL's existing service area, and planning only to expand to new areas leaves that community with limited resources. CILs also need to understand and assess their own current capacity, and how they may need to build that capacity, so it can be incorporated into the IL Network's planning.

Reminders and Requirements

- Plan to build capacity of existing CILs.
- Plan to expand statewideness through branch offices and/or satellites.

- Criteria for selecting capacity-building activities and expansion sites.

Drafting Tips

- Capacity building can include staffing, data systems, fiscal infrastructure, governance, outreach, transition/diversion capacity, peer support, language access, rural service models, and collaboration.
- Define whether branches/satellites are service access points, staffed offices, shared locations, or temporary outreach sites.
- Link capacity investments to outcomes and service gaps.

Review Worksheet

Review question	Notes / SPIL language/decision
Does this section's language include any capacity-building provisions for CILs? Is CIL capacity building included in other areas of the SPIL, such as Section 1.1 Goals & Objectives? If so, these sections should coincide.	
Do CILs currently have the capacity to fully serve their service area? How, specifically, was this answer determined? (If data was gathered during the needs assessment and public input process, it can also be referenced here.	
If the CILs in your network have achieved the minimum funding level, have any considered opening satellite offices?	
Would a satellite benefit an existing service area? How specifically?	
Would a satellite benefit an unserved area?	
What additional factors should be considered to increase the capacity of your CIL network?	

Common Pitfalls to Avoid

- Using one-time funds for ongoing costs without a sustainability plan.

- Opening satellites without staffing/service expectations.
- Capacity building not tied to measurable improvement.

Distribution of New Funds

When new funding comes to the State, it can be a fantastic opportunity for the network to grow and strengthen. Coming to an agreement through the SPIL in this section can help the IL Network understand what may happen in advance, so there are no surprises or tension.

Reminders and Requirements

- Plan/formula for distribution of new funds, including Part B, Part C, State, other, and one-time funds where applicable.
- Priorities for existing CIL capacity, minimum funding, expansion, and new CIL development.
- Methodology for distribution.

Drafting Tips

- Make the process specific enough that funds can move quickly when available.
- Decide whether new general operating funds first address minimum funding, then capacity, then expansion.

Review Worksheet

Review question	Notes / SPIL language / decision
Will new funding be used to bring CILs to a minimum funding level?	
If CILs are already at the minimum funding level, does your Plan specify how the new funds are to be distributed?	
Does your Plan include language that will work for any amount of funds that may come into your State?	
Does your network have additional options that they should consider?	

Common Pitfalls to Avoid

- A vague promise to decide later.
- No treatment of restricted or geographically targeted funds.
- No connection to Section 1.5 financial plan or minimum funding levels.

Reductions in Funding

While no IL Network wants to imagine situations where funding is being reduced, it is a vital conversation to have before that becomes the case. Deciding and agreeing in advance on how reductions will be handled across funding sources, while protecting access to IL services and minimum funding levels as much as possible, is essential to the health of the Network.

Reminders and Requirements

- Plan/formula for adjusting the distribution of funds when funding is cut or reduced.
- Relationship to minimum funding levels and service-area obligations.
- Treatment of all funds included in the financial Plan.

Drafting Tips

- Plan for federal, State, and other reductions.
- Decide whether reductions are across-the-board, tiered, proportional, or protect CILs below the minimum.
- Include decision timelines, consultation, and documentation.
- Explain how consumer impact will be considered.

Review Worksheet

Review question	Notes / SPIL language/decision
How will you determine how funding cuts will be distributed?	
How will CIL consumers be involved in these decisions?	
Does your language include a clear direction on what will occur if funding is reduced?	
Does the SPIL address how to implement funding reductions of all funds included in the Financial Plan	
Do the funding reductions consider the minimum funding levels, for example, are CILs above the minimum funding level reduced before or more than CILs below the minimum funding level?	

Review question	Notes / SPIL language/decision
If all CILs currently have more than the minimum funding level, what is the total amount of funding over minimum currently?	

Common Pitfalls to Avoid

- Waiting until cuts occur to negotiate the formula.
- Reducing CILs below the minimum without analysis.
- No consumer input or service continuity plan.
- No link to the amendment process.

Changes to Service Areas and Funding Levels

Through the SPIL, the IL Network can make adjustments to the current network to provide additional services, improve operations, and build greater strength. The SPIL can allow for a Part C service area to be adjusted, changes in Part B funding distributions, or other allowable adjustments.

Reminders and Requirements

- Plan for changes to CIL service areas and/or funding levels.
- CILs included in the change.
- New counties/areas assigned or removed.
- Funding changes agreed upon or a statement that no funding changes are needed.

Drafting Tips

- Be concrete and succinct.
- Use maps and tables.
- State the rationale and effective date.

Review Worksheet

Review question	Notes / SPIL language/decision
Do existing CILs have the capacity and ability to expand services to new and unserved territories through their existing infrastructure?	
Do current CILs have the capacity to manage multiple Part C awards to expand service areas?	

Review question	Notes / SPIL language/decision
Are there current issues with CIL service areas, either being overlapped, too large, or not large enough, that prevent the SPIL from being sufficiently implemented under the requirements?	
Is funding currently distributed in a manner that provides for the support needed and required by the State Plan?	
Is your IL Network in agreement that changes to service areas or funding distributions can achieve advancements to the statewideness provision of the Rehabilitation Act?	
Will changes in funding distributions provide for more stability for your IL Network, and assist in building the support for the IL network?	

Common Pitfalls to Avoid

- Not having a process that the CILs do not fully agree to or fully understand the formula or decision-making structure.
- Not including how the changes will impact consumers.
- The network does not have a way to discuss the changes and impact across the State.

One-Time Funding

Occasionally, the IL Network may have an opportunity for one-time funding that is connected to the SPIL or federal IL funding. In those times, it is important to have some understanding of how the network may handle the situation. Because the funding may be very limited in scope, not every situation can be easily addressed, but basic agreements can be achieved.

Reminders and Requirements

- Plan/formula for distribution of one-time funds.
- Allowable priority uses.
- Decision process and documentation.
- Sustainability considerations

Drafting Tips

- Use one-time funds for non-recurring investments when possible: technology, outreach campaigns, needs assessments, capacity building, temporary pilots, equipment, accessibility improvements, or planning.
- Describe whether funds are distributed equally, by need, by competitive proposal, by formula, or by network priority.

Review Worksheet

Review question	Notes / SPIL language/decision
Does your Plan address one-time or temporary funding for the network?	
Were lessons learned from past funding opportunities considered in developing the most recent Plan for one-time funding?	
How does the process outlined in the SPIL for one-time funding align with any goals of the IL Network?	
Was CIL capacity considered in establishing the Plan for the distribution of funds?	

Common Pitfalls to Avoid

- Using one-time funds to start ongoing services with no plan.
- No reporting requirements.
- No process for fair selection.

Temporary Changes or Other

There may be situations, such as an emergency or disaster, which disrupt the operations of a CIL, leading to the need for temporary changes. There could also be state-specific factors a network needs to address that affect its expansion and adjustment. This section is one where the other situations can be addressed.

Temporary changes may also occur if a situation arises that could cause a deviation from the funding structures in place. This could include a CIL facing a temporary change in structure and being unable to expend all allocated funding within the required time; changes in distribution if a CIL has been unable to consistently expend allocated funds; or other situations that may lead to unspent funding. In any of these situations, the IL Network should have a discussion before the possibility so that a plan can be established and followed consistently with the approved SPIL.

Common Pitfalls to Avoid

- No timeline or reporting expectations have been outlined in the SPIL for the DSE to report to the IL Network that Part B funds remain unspent.
- The SPIL does not include a specific allocation plan for the redistribution and use of unspent Part B funds before they expire.

Section 4: Designated State Entity

The purpose of the **Designated State Entity** section is to:

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

In the **Designated State Entity** section, you will answer the following questions:

- 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 the DSE distribute the funding?

Section 4.1 DSE Responsibilities

The purpose of the **DSE Responsibilities** section is to identify the responsibilities of the DSE. The purpose of the **sections following the DSE Responsibilities** is to explain how the DSE will fulfill those responsibilities.

Section 4.2 Administration and Staffing: DSE Assurances

SPIL Instructions

Explain how the DSE will demonstrate that not more than 5% of the Part B appropriation (including state match) will be used on administrative costs.

When DSE employees serve as staff to the SILC, describe how the DSE will ensure that the SILC has the ability to hire, fire, and supervise such staff.

Describe how the DSE will assure that such staff will not be assigned to other projects/activities that would create a conflict of interest with their SILC responsibilities.

Reminders and Requirements

- Assurances that DSE administration will comply with applicable requirements.
- Description of staffing arrangements that do not compromise SILC autonomy.

Drafting Tips

- Clarify whether DSE staff perform fiscal processing, contract administration, or other administrative functions.
- Avoid assigning SILC staff duties to the DSE or allowing the DSE to direct SILC staff.
- Cross-check with Section 5.2 SILC Resource Plan.

Review Worksheet

Review question	Notes / SPIL language/decision
What staffing or administrative support does the DSE provide?	
Could any arrangement compromise SILC autonomy?	
Does this section describe how the SILC will have the ability to hire, fire, and supervise DSE employees serving as SILC staff?	
Does the draft include an explanation of how the DSE will demonstrate that not more than 5% of the Part B appropriation (including state match) will be used on administrative costs?	
Are conflict-of-interest issues addressed?	

Common Pitfalls to Avoid

- DSE controls SILC staff duties.
- Unclear administrative costs.
- No process for fiscal support.

Section 4.3 State-Imposed Requirements

SPIL Instructions

Describe any requirements imposed by the State that is in addition to the Act and the IL regulations. Requirements may be with regard to:

- *Establishment and operations of the SILC*
- *Provision of and uses of State funding for Independent Living services and/or the SILC*
- *Any other requirements having a direct impact on the SILC, CILs, IL services, and/or processing of funding*

Describe how the DSE will ensure compliance with State requirements without restricting the autonomy of the SILC in fulfilling its duties, authorities, and responsibilities.

(NOTE: Pursuant to 45 CFR 1329.15(c)(4), the DSE may not include any conditions or requirements in the SILC's Resource Plan that may compromise the independence of the SILC.)

Reminders and Requirements

- Description of any state-imposed rules, procedures, or requirements.
- Explanation of how they are applied.
- Confirmation that they do not conflict with Title VII or SILC autonomy.

Drafting Tips

- Identify procurement, fiscal, travel, reporting, ethics, public meetings, or state administrative requirements that affect SPIL funds or operations.
- State “none” if there are no applicable state-imposed requirements beyond standard fiscal requirements.
- Avoid vague references to state rules without explaining practical impact.

Review Worksheet

Review question	Notes / SPIL language / decision
Are there any state or DSE-imposed laws, rules, regulations, contract provisions, or process requirements impacting procurement, fiscal, travel, reporting, ethics, public meetings, or administrative activities directly affecting the SILC, CILs, IL services, and/or processing of funding?	
Do they affect the SILC resource plan, CIL funding, or service delivery? If so, does it conflict with Title VII or SILC autonomy?	
Are they compatible with federal requirements?	

Common Pitfalls to Avoid

- Not naming state requirements that affect implementation.
- Including requirements that limit SILC authority improperly.
- No explanation of how requirements apply.

Section 4.4 Grant Process & Distribution of Funds

SPIL Instructions

Describe the processes, policies, and procedures to be followed by the DSE in the awarding of grants of Part B funds including (all of the following are required):

- *Process for soliciting proposals*
- *Development of format for proposals*

- *Process for reviewing proposals and who reviewers will be*
- *Process for evaluating performance and compliance of grantees*

(The above must also specify any differences for continuation funding vs. new awards.)

Reminders and Requirements

- Grant/contract process.
- Selection of grantees/contractors.
- Distribution of funds.
- Connection to Section 1.5 and Section 3.2 formulas.

Drafting Tips

- Describe timelines, application processes, review criteria, award decisions, and payment methods.
- Include how CILs or other providers receive Part B funds.
- Make sure the distribution process matches the financial plan and network funding decisions.

Review Worksheet

Review question	Notes / SPIL language/decision
Who issues grants/contracts?	
What process is used for selection?	
What criteria are used?	
How is payment, invoicing, or reimbursement handled?	
How are formula distributions implemented?	

Common Pitfalls to Avoid

- No selection criteria.
- No link to Section 3.2 distribution formulas.
- Ambiguous responsibility between SILC and DSE.
- Using informal processes for significant awards.

Section 4.5 Oversight Process for Part B Funds

SPIL Instructions

Describe the oversight process for:

- *Part B (with or without Part C received) oversight by DSE*
- *Other funds included in 1.5 Financial Plan, excluding section 722 part C funds*
- *Other oversight activities*

Reminders and Requirements

- Oversight process for Part B funds.
- Roles of DSE, SILC, CILs, and other recipients.
- Monitoring, invoicing, reporting, corrective action, and documentation expectations.

Drafting Tips

- This section should be negotiated and specific.
- Separate fiscal oversight from SPIL evaluation.
- Include invoice review, allowability, reporting, monitoring, desk reviews, site reviews if used, risk assessment, and the corrective action process.
- Clarify oversight for Part B funds used for CIL general operations.

Review Worksheet

Review question	Notes / SPIL language/decision
What monitoring is completed?	
Is there a risk-based or targeted review process?	
How often are invoices/reports reviewed?	
Who reviews allowability?	

Common Pitfalls to Avoid

- No formal oversight process.
- Confusing SPIL evaluation with subrecipient monitoring.
- No documentation of reviews.
- No process for corrective action.

Section 4.6 722 vs. 723 State

SPIL Instructions

To indicate which applies to your State

Reminders and Requirements

- In a 722 state, CILs receive Part C funding directly from ACL. A CIL program will operate under section 722 if a state receives more Part C funding than state funding to support CIL operations in the previous year.
- In a 723 state, the DSE receives Part C funding and distributes it to CILs according to the financial Plan in the State Plan for Independent Living (SPIL). The State is eligible to receive funding under section 723 when that State provides as much, or more funding than the federal Part C allotment to support the general operations of CILs for the preceding fiscal year.

- ACL's FAQ Page provides more information for 722 states that may want to become a 723 state.

Section 4.7 723 States

SPIL Instructions

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

Describe the order of priorities for allocating funds, how agreement of the SILC and CILs was secured, and differences (if any) from the priorities in the regulations.

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

Describe the processes, policies, and procedures to be followed in the awarding of grants of Part B and Part C funds including:

- *Process for soliciting*
- *Development of format for proposals*
- *Process for reviewing proposals and who reviewers will be*
- *Process for evaluating performance and compliance of grantees*

The above must also specify any differences for continuation funding vs. new awards.

The oversight process to be followed by the DSE.

Describe the oversight process for:

- *Part C and Part B (alone or in combination with other funds)*
- *Other funds included in 1.4 Financial Plan*
- *Other oversight activities*

Reminders and Requirements

- Describe the administration of Part C funding by the DSE.
- Describe how new awards and funding will be issued to CILs.
- Describe the oversight of Part C and Part B funding.

Drafting Tips

- Provide as much detail as possible so ACL and the IL Network understand the full scope of how the DSE will manage and monitor IL Funding.
- Describe how the DSE will conduct the compliance review of CILs.

Section 5: Statewide Independent Living Council

The purpose of the **Statewide Independent Living Council** section is to:

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

In the **Statewide Independent Living Council** section, you will answer these questions:

- How is the SILC structured?
- How will the SILC be funded and operated?
- What work will the SILC be doing?

Section 5.1 Establishment of the SILC

SPIL Instructions

Describe the establishment (legal mechanism by which the SILC was established), placement (where the SILC is located organizationally and fiscally), and organizational status of the SILC (non-profit, or other) and how autonomy and independence from the DSE (and all other state agencies) is assured.

Explanation

The purpose of the **Establishment of the SILC** section is to detail the SILC's establishment, independence, membership, and role in carrying out its required duties and exercising its authorities.

Reminders and Requirements

- Description of SILC establishment.
- Membership and appointment context.
- SILC duties and authorities.
- Autonomy from DSE and other state agencies.

Drafting Tips

- Describe the SILC as the statewide council responsible for SPIL development, monitoring, review, and evaluation.
- Address membership compliance and recruitment where relevant.
- Clarify that the SILC is not established within a state agency if applicable.

Review Worksheet

Review question	Notes / SPIL language/decision
Does the draft include information about how exactly the SILC was legally established? This should include verifiable details such as dates and legal mechanisms (e.g., executive orders, state laws, etc.)	
Is the SILC structure described accurately, including its placement as an organization, and its status as a non-profit or other structure	

Review question	Notes / SPIL language/decision
Is an explanation included on how the SILC is separate and autonomous from state agencies, including the DSE?	
Does the language reflect consumer control and required representation?	
Are appointment and vacancy processes clear?	
Does the section support SILC autonomy?	

Common Pitfalls to Avoid

- Outdated membership descriptions.
- No plan for vacancies or representation gaps.
- Language that makes the SILC appear controlled by the DSE.

Section 5.2 SILC Resource Plan

SPIL Instructions

Provide a brief description of how the SILC Authorities will be conducted by the SILC during the years covered in the SPIL.

A description of the SILC's resource plan must be included in the State plan. The Plan should include resources for the SILC to fulfill duties and authorities.

Provide a detailed description of all types of resources to be included in the SILC Resource Plan including:

- *Staff/personnel costs;*
- *Operating expenses;*
- *Council compensation and expenses;*
- *Meeting expenses, including public hearing expenses, such as meeting space, alternate formats, interpreters, and other accommodations;*
- *Resources to attend and/or secure training for staff and Council members; and*
- *(Other costs as appropriate.)*

Resources must be necessary and sufficient to ensure the capacity of the SILC to fulfill all the duties and selected authorities (section 705 (c) of the Act). A detailed SILC budget is not required with this SPIL. The SILC is allowed to do resource development.

Process used to develop the Resource Plan.

Describe the process used by the SILC, CILs (if Part B funds are included), and DSE to determine the amounts and sources of resources to be included in the Plan.

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

Describe what process(es) will be used to disburse funds for the SILC Resource Plan including how such process(es) will ensure timeliness and efficiency, prevent undue hardship on the SILC, and ensure continual (uninterrupted) operations and effectiveness of the SILC.

NOTE: Pursuant to 45 CFR 1329.15(c)(4), the DSE may not include any conditions or requirements in the SILC Resource Plan that may compromise the independence of the SILC.

Explanation

The purpose of the **SILC Resource Plan** section is to describe the resources necessary and sufficient for the SILC to carry out its duties and authorities, including staffing, personnel, budget, and sources of support.

Reminders and Requirements

- SILC resource plan.
- Sources and amounts of funding/resources.
- Staffing and personnel arrangements.
- Justification if more than 30% of Part B is used for the SILC Resource Plan.
- Assurance that conditions do not compromise SILC independence.

Drafting Tips

- Tie the resource plan to required SILC duties, not only operations.
- Include staffing, contractors, meeting costs, accessibility/accommodations, travel, public input, SPIL evaluation, training, and administration.
- Explain how the SILC manages its own budget and supervises/evaluates staff.
- Cross-check with Section 1.5 financial plan.
- Demonstrate how the Resource Plan allows the SILC to carry out all of their required duties and authorities, and identify any limitations because of additional need.

Review Worksheet

Review question	Notes / SPIL language/decision
Does the SILC Resource Plan include what resources (funding sources and amounts) are available to the SILC and how they will be used for the following: personnel, operating costs, council expenses, meeting and training expenses, and other costs that are necessary to carry out the duties and authorities outlined in the SPIL?	
Are resources sufficient for SPIL development, monitoring, review, and evaluation?	

Review question	Notes / SPIL language/decision
Are staff and contractor roles clear?	
Does the resource plan protect SILC autonomy? Do any DSE requirements, including contract or process rules, risk the independence of the SILC?	
Does Section 1.5 match the resource plan amounts?	
Is the >30% Part B justification included, if needed?	
Does the draft clearly describe the process and timeline of disbursement of funds from the DSE to the SILC? Does this Plan ensure the continual operation of the SILC?	
Does the draft include which specific SILC authorities will be used during the SPIL cycle and how they will be used?	

Common Pitfalls to Avoid

- Resource plan amounts do not match financial Plan.
- No staffing details.
- DSE conditions that compromise autonomy.
- No justification for Part B percentage when required.

Section 5.3 Maintenance of the SILC

SPIL Instructions

Describe how the State will ensure that: (all of the following are required)

- *the SILC is established and operating*
- *appointments are made in a timely manner to keep the SILC in compliance with the Act*
- *the SILC is organized in a way to ensure it is not part of any state agency*
- *the SILC has the autonomy necessary to fulfill its duties and authorities, including "[working] with CILs to coordinate services with public and private entities, . . . conducting resource development, and performing such other functions . . . as the [SILC] determines to be appropriate"*

- *necessary and sufficient resources are provided for the SILC Resource Plan to ensure the SILC has the capacity to fulfill its statutory duties and authorities*

Explanation

This purpose of the **Maintenance of the SILC** section is to describe how the SILC will maintain operations, membership, policies, procedures, training, meetings, and compliance over the SPIL period.

Reminders and Requirements

- Describe the SILC operations.
- Policies/procedures needed for effective functioning.
- Member recruitment and training.
- Processes for appointments and information about the appointing authority.

Drafting Tips

- Describe ongoing governance infrastructure.
- Include recruitment, orientation, training, conflict of interest, public meetings, records, fiscal oversight, and evaluation of SILC operations where applicable.
- Link maintenance activities to the resource plan.
- Consider including succession planning for SILC members.
- If the SILC is a non-profit, include how they are following all state-level requirements.

Review Worksheet

Review question	Notes / SPIL language/decision
How will SILC membership be maintained?	
How will members be oriented and trained?	
What policies support compliance and transparency?	
How will public access and accommodations be provided?	
How will SILC performance be reviewed?	

Common Pitfalls to Avoid

- No member training plan.
- No vacancy/recruitment strategy.
- No public access process.
- Maintenance activities are not budgeted.

Section 6: Legal Basis and Certifications

SPIL Instructions

This section verifies all the entities with authorities and responsibilities for the SPIL.

Explanation

The purpose of the **Legal Basis and Certification** section is to confirm the legal basis for the SPIL and the required certification of the organization's signing. Additional purpose of this section:

1. Identify the DSE agency
2. Identify the SILC
3. Identify all CILs eligible to sign the Plan
4. Affirm that the entities have the legal ability to participate in and carry out the Plan

In the Legal Basis and Certification section, you will answer the following questions:

- What organization is named 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

SPIL Instructions

The Assurances detail the roles and responsibilities of the DSE. The Assurances are also found on the DSE Notice of Award.

Explanation

The purpose of the **DSE Assurances** section is to document the DSE's agreement to follow the assurances related to its role and the details of Section 4:

1. List all the Assurances the DSE agrees to follow
2. Record the DSE Director's signature to acknowledge agreement to the Assurances and to fulfill the role of the DSE

In the **DSE Assurances** section, you will answer the following questions:

- Did the DSE agree to serve in the role of the DSE and follow the assurances?
- Did the DSE Director sign in agreement that their organization will be the DSE?

Reminders and Requirements

- DSE Director signing to confirm they agree to serve as the DSE and follow all DSE Assurances.

Review Worksheet

Review question	Notes / SPIL language/decision
Has the DSE reviewed the final Plan?	
Do assurances match the DSE role in Section 4?	
Are fiscal and administrative responsibilities feasible?	
Does the DSE signature reflect agreement to serve and fulfill responsibilities?	

Common Pitfalls to Avoid

- DSE sign-off is requested too late in the process, leaving little time to resolve any concerns or issues.
- Narrative language of Section 4 expands DSE duties without agreement.
- Inconsistency between DSE assurances and Section 4.

Section 8: SILC Assurances and Indicators of Minimum Compliance

SPIL Instructions

Review and sign the indicators of minimum compliance.

Explanation

The purpose of the **SILC Assurances and Indicators of the Minimum Compliance** section is to confirm that the SILC will meet the required Assurances and Indicators, including autonomy, membership duties, resource plan, and SPIL responsibilities. In addition, this section:

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

In the **SILC Assurances and Indicators of Minimum Compliance** section, you will answer the following questions:

- What does the SILC agree to follow?
- Who is the SILC Chairperson?
- Did the SILC Chairperson sign and agree that the SILC will do what the SILC is supposed to do?

Reminders and Requirements

- Review of indicators of minimum compliance.
- The SILC Chairperson signing on behalf of the SILC agrees to maintain all required policies and commitment to maintaining minimum compliance.

Review Worksheet

Review question	Notes / SPIL language / decision
Can the SILC document compliance with each assurance?	
Are membership composition and consumer control requirements met or actively addressed?	
Are policies and procedures sufficient?	

Common Pitfalls to Avoid

- Review of indicators of minimum compliance should be discussed by the SILC.
- The SILC should confirm or authorize the SILC Chair to sign.

Section 9: Signatures

SPIL Instructions

Please ensure that all specified signatures are included. All Part B CILs and Part C CILs in the State (or outlying area or District of Columbia, as the case may be) that meet the section 725 assurances, including CILs that do not sign the SPIL, need to be included in the signatory lines. (A CIL that is one legal entity that has multiple Part C grants is only one potential signatory and, therefore, needs only one signature line.)

If a required signatory objects to the SPIL, then that required signatory needs to notify tell the program officer before SPIL submission.

Explanation

The purpose of the **Signatures** section is to obtain the required signatures and confirm the SILC's and the CILs' agreement to the final SPIL, including the content, scope, and participation.:

1. Record the SILC Chairperson signature, agreeing to the content of the Plan.
2. Record CILs' signatures, agreeing to the content of the Plan. Signatures must be obtained from a minimum of 51% of all CILs

In the **Signatures** section, you will answer the following questions:

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

Reminders and Requirements

- If a legal entity constituting a “CIL” holds multiple Part C grants that are treated as separate Centers for all other purposes, that entity is counted as a single Center for SPIL signature purposes.
- CILs with service areas spanning more than one State may participate in developing and signing the SPIL in each State they serve, provided they meet the applicable requirements in that State.
- SILC chair signature on behalf of and at the direction of the SILC.
- Signatures from not less than 51% of CIL directors in the State. The CIL definition for purposes of signing the SPIL is located at the beginning of this document.

Review Worksheet

Review question	Notes / SPIL language/decision
Has the SILC formally authorized the chair to sign?	
Have at least 51% of CIL directors agreed and signed?	
Are all signatures on the final version?	

Common Pitfalls to Avoid

- Start signature planning early.
- Confirm who is authorized to sign for each CIL.
- Maintain records of SILC action directing the chair to sign.
- Ensure that the signed version is the final version.

SPIL Amendments

The SPIL may need to be amended when there is a material change in state law, organization, policy, agency operations, funding methods, service areas, priorities, DSE designation, or other elements that affect administration or implementation. The following tool helps determine whether a change should be discussed with ACL/OILP as a technical or substantial amendment.

Potential change	Likely amendment type	Public input likely needed?	Signatures required?	Notes
Change in goals/objectives affecting scope of services	Substantial	Yes	SILC chair and at least 51% of CIL directors; DSE if duties change	Consult ACL/OILP early.
Change in unserved/underserved designations or priorities	Substantial	Yes	SILC chair and at least 51% of CIL directors	Connect to Section 2.2 and 3.2.
Change in funding distribution formula	Substantial	Yes	SILC chair and at least 51% of CIL directors; DSE if duties change	Analyze Section 1.5 and 3.2.
Change of DSE to an entity not identified in SPIL	Substantial	Yes	SILC chair, CIL directors, and DSE as required	Major change.
Change in responsible entity without changing objective	Technical	Usually no	SILC chair and at least 51% of CIL directors	Confirm with program officer.

Potential change	Likely amendment type	Public input likely needed?	Signatures required?	Notes
Change in dates or implementation timeline	Technical	Usually no	SILC chair and at least 51% of CIL directors	Document rationale.
Change in SILC chair or DSE director only	Technical	Usually no	As directed by ACL/OILP	Does not change entity.

SPIL Development Planning Tables

This section will allow you to plan the SPIL development process and establish your State's timelines.

Public Input Prior to Drafting

Review question	Notes/decision
What process will be used to gather public input prior to the drafting of the SPIL?	
What is the timeline for gathering information?	
How will the information be used to develop the SPIL?	
How will the process be documented?	
How will you gather information from the CILs?	
How will the input process be done in collaboration across the whole network?	
How will accessibility be ensured for all activities?	

Drafting Process

Review question	Notes/decision
What process will be used to draft the language for the SPIL?	
How will all CIL Directors be included or invited to participate?	
What timeline will be used to have a draft completed?	
When will a draft be available for the public to review and provide input?	

Review question	Notes/decision
How will meetings about the SPIL development be made available to the public with the required notice?	
How will conflict be managed in the drafting process?	
Will other stakeholders be included in the drafting process?	

Public Input on Final Draft

Review question	Notes/decision
How will a final draft be made available for the public to review?	
How will the public be able to provide input and comment on the proposed SPIL?	
How will the comments be reviewed?	
How will changes be made based on public comment?	
When will the final version of the SPIL after any revisions from public comment be ready for final approval?	

Signature Collection and Submission

Review question	Notes/decision
When will the SILC vote to approve the Plan, and authorize the SILC Chair to sign the SPIL?	
Who will enter the SPIL into the electronic portal?	

Review question	Notes/decision
When will the CILs and the DSE receive the final copy that will be sent for signature?	
When will all final signatures be due?	
What date will you submit the final signed SPIL?	

Public Input Summary

Table or summary to show the public input process.

Input Before Drafting

What was done?	What was gathered?	When was it done?	How was it used?

During Drafting

What was done?	What was gathered?	When was it done?	How was it used?

Final Draft of the SPIL

What was done?	What was gathered?	When was it done?	How was it used?

ILT&TA Center Contact Information

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The Independent Living Training & Technical Assistance Center is on assignment with the U.S. Department of Health and Human Services, Administration for Community Living.