Dear Colleague:

We are pleased to provide you with submission information, key guidance, tips for developing the FY 2017-2019 State Plan for Independent Living (SPIL), and resources for technical assistance. As a reminder, the MIS system was migrated from the Department of Education to the Administration for Community Living (ACL). The SPIL may now be submitted by Statewide Independent Living Councils (SILC) via the ACL-MIS at: <https://mis.acl.gov/>. **The SPIL must be submitted into the ACL-MIS** **no later than 11:59 PM EST on June 30, 2016**. **Emailed or hard copy SPILs will not be accepted.**

Submission information regarding the ACL-MIS:

* **If you are not registered or forgot your user name/password**, go to <https://mis.acl.gov/> and click “*Info for New Users*.” Click the “*Fill out a Request MIS Access form*” button at the bottom of the screen.  Further instructions will be provided via email.
* **If you have an existing account from the RSA-MIS**, you should use your current username and password to login to the site. Please check and update your contact information.
* To access the SPIL once you have completed the login, select “*Continue to Data Entry*.” You will find the SPIL under “*Reports to Do.*” Select “Edit” to enter information into the SPIL.
* If you are registered in the ACL-MIS but do not see the SPIL on your Data Entry screen, select “*Need a form that isn’t listed? Click here to try to add access*” on the upper right of your screen and follow the prompts to add the SPIL.
* ACL-MIS login technical support is found at<https://mis.acl.gov/technical-support.cfm>.

Please Note: Although the site is live and the major functionality is in place, a few minor aspects of the system are being adjusted, however, it should not impact your ability to submit reports.

### KEY GUIDANCE

**The SPIL instrument and instructions are unchanged from the FY 2014 - FY 2016 SPIL cycle**. Instructions for completing the SPIL are found directly in the SPIL instrument. This guidance is intended to supplement the instructions not replace the instructions.

States wishing to receive funding under Parts B and C of the Rehabilitation Act, as amended by WIOA, must submit an approvable three-year SPIL to ACL **no later than 11:59 PM EST June 30, 2016**. The ACL Administrator may withhold, reduce, limit or terminate funding in accordance with the procedures described in Uniform Administrative Guidance at 2 CFR 200 if a State does not submit an approvable SPIL.

The SPIL encompasses the activities planned by the State to achieve its specified independent living objectives and reflects the State's commitment to comply with all applicable statutory and regulatory requirements during the three years covered by the plan. Part I of the FY 2017-2019 SPIL instrument is a series of assurances based on legal and regulatory provisions governing the Independent Living Services (ILS) and Centers for Independent Living (CIL) programs. Part II consists of narrative sections in which the state describes its independent living objectives, services, activities, financial plans and operational details.

The passage of the Workforce Innovation and Opportunity Act of 2014 (WIOA) amended the Rehabilitation Act resulting in changes to the development of the SPIL. However, final regulations implementing WIOA have to date, not been published. Therefore, please be aware that inconsistencies exist between the OMB approved SPIL instrument, language in the Rehabilitation Act, as amended by WIOA, and previously issued guidance by ACL.

For example, the SPIL instrument does not reference the Designated State Entity (DSE). except for the 723 States (currently Massachusetts and Minnesota), it should be assumed throughout the current SPIL instrument that DSE is intended where all instances of Designated State Unit (DSU) are found. It should also be assumed that all references to the Education Department General Administrative Guidance (EDGAR) no longer apply. Rather, the Uniform Guidance beginning at 2 CFR § 200 is applicable.

When interpreting inconsistencies during the development of the SPIL, ACL encourages stakeholders to refer to the plain language of the Rehabilitation Act, as amended by WIOA, and previously issued guidance by ACL that is found at <http://www.acl.gov/Programs/AoD/ILA/Index.aspx>. Additional resources for technical assistance are found at the end of this document.

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A single SPIL is to be submitted for each State, jointly developed by the SILC, and directors of Centers for Independent Living (CILs).

To comply with federal requirements, during the SPIL development process, States are required to hold public hearings, that provide all segments of the public, including interested groups, organizations and individuals, the opportunity to comment on the contents of the SPIL prior to its submission. The SILC may meet the public participation requirement by holding the public meetings before a preliminary draft State plan is prepared or by providing a preliminary draft State plan for comment at the public meetings. The SILC must identify, during the public hearings, any provisions in the State plan that are State-imposed requirements relating to the administration or operation of any program funded under title VII of the Rehabilitation Act, as amended by WIOA.

In developing the SPIL objectives, the SILC is to actively consult with the Director of the state Client Assistance Program, and to consider and incorporate the program and financial planning objectives and priorities established by CILs.

### PLEASE NOTE: The SPIL must be signed by the chair of the Statewide Independent Living Council (SILC), on behalf of the SILC, not less than 51% of the center directors in the state, and the DSE director prior to submission to ACL. SPIL instrument Part I, Section 9 (Assurances), requires a signed hard copy of the SPIL to be kept on file in the SILC offices, together with a signed copy of the Federal Restrictions on Lobbying form. The lobbying form is available at:

### <http://acl.gov/Funding_Opportunities/Announcements/Index.aspx>

**TIPS FOR DEVELOPING THE SPIL**

**Supporting documentation must be available for inspection on file with the SILC but is NOT to be submitted with the SPIL**. The following tips are based on common mistakes historically found in SPILs which delay the SPIL approval process.

**Narratives**

* SPIL narratives should explain **how** the federal requirements will be met, not simply re-state the Part I assurances, particularly in section 5 (Statewide Independent Living Council) and 6 (Service Provider Requirements).
* Related sections should be cross-checked for accuracy and consistency, especially sections:
* 1.2B (Outreach Plans), 2,1B (Service Provision Priorities) and 3.2 (Expansion of the Network) are consistent;
* 1.2A (Objectives and Time Frames), 1.3A (Financial Plan Tables), 1.3B (Financial Plan Narratives), and 7 (Evaluation); and
* 4.1 (Administrative Support Services), 1.3B (3) (In-kind Resources) and 5.1A (Resource Plan).

**Goals, Objectives and Activities**

* Develop one mission for the IL Network, including the SILC, CILs, and DSE. Be sure to include how these goals and objectives will be measured throughout the life of the SPIL.
* The financial plan is a summary of the anticipated sources, amounts and proposed uses of funds to support the SPIL objectives.  **It is not a detailed budget.**

**Design for the Statewide Network of Centers**

* Section 3.2 Expansion of the Network

Ensure the SPIL addresses the State’s intent if additional Part C funds become available through the congressional appropriations process or grant relinquishment/termination. Describe in detail what happens if funds become available (i.e., will ACL hold a competition for that service area or will funds be divided up among existing Part C CILs?)

**Designated State Unit**

* Read as Designated State Entity (DSE)
* ACL has provided guidance on the role of the DSE during the SPIL development process. This can be found at <http://www.acl.gov/Programs/AoD/ILA/Index.aspx#dse> .

**Statewide Independent Living Council (SILC)**

* Before submitting the SPIL, states must take necessary steps to ensure that the SILC is constituted in compliance with federal requirements.
* The SILC shall not be established as an entity within a State agency, including the DSE. The SILC shall be independent of and autonomous from the DSE and all other State agencies.
* Ensure all activities assigned to the SILC in the SPIL are consistent with the functions, authorities, and limitations as set forth in the Rehabilitation Act, as amended by WIOA (Sec.706(c),(2) and (3)).

### TECHNICAL ASSISTANCE

SILC-NET has developed several SPIL-related resources in coordination with ACL:

* Overview of the changes made to CILs and SILCs in WIOA webinar: <http://www.ilru.org/training/workforce-innovation-and-opportunity-act-wioa-and-independent-living-for-silcs>

### Publications and On-demand training: <http://www.ilru.org/topics/state-plan-for-independent-living-spil>

ACL anticipates that once final regulations implementing WIOA have been published, amendments to the 2017-2019 SPILs **may be** necessary. ACL will provide additional guidance at that time. If you have questions about the SPIL instrument or submission, please contact the Independent Living Specialist for your state.

Sincerely,

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