

# IL-NET

## 2015 SILC Needs Assessment Survey Report

This report contains a statistical analysis of the results of the survey sent to Statewide Independent Living Councils in January 2015. The purpose of the survey was to obtain feedback from the SILCs about their anticipated training and technical assistance needs related to changes made by the Workforce Innovation and Opportunity Act. There are 13 major changes affecting the SILCs. Fifty-eight individuals responded to the survey from 38 states and four territories. All identifying information has been removed to preserve confidentiality. Comments and questions are now being accepted by the Administration for Community Living at [WIOA@acl.hhs.gov](mailto:WIOA@acl.hhs.gov). This is an opportunity for everyone to share their thoughts and concerns before the Notice of Proposed Rulemaking is released.

**Question 1: What technical assistance or training is needed in your state in order for the newly defined joint development and signing of the plan, with 51% of the directors of CILs signing, to proceed smoothly? Check all that apply.**

Responses	Per Cent	Count
• Strategies for strengthening collaboration with CILs	53.5%	31
• Strategies for transitioning from joint development with the DSU to joint development with the CILs	55.2%	32
• The full Council’s role in the development and approval of the SPIL	67.2%	39
• Approaches for working with the Designated State Entity who is no longer required to jointly develop the SPIL, but now is required to sign the SPIL only as agreement that they will serve as and fulfill the defined duties of the DSE	72.4%	42
• No training or TA will be needed	5.2%	3
• Other	6.9%	4
	Total	58

Responses “Other”	Count
• <i>Left Blank</i>	54
• In small CIL states, what if there isn’t a consensus?	1
• What happens if some CIL directors don’t sign.	1
• Our biggest concern is if we select a new DSE, will VR be willing to continue to fund the SILC & contract with CILs?	1
• Our SILC develops the plan currently in conjunction with all CIL Directors. They review the SPIL and give us the go ahead to submit. It has always been a part of our SPIL Development.	1

**Question 2: What training or TA would be of assistance to your SILC as you consider the Periodic Review and Revision section of the law? Check all that apply.**

<b>Responses</b>	<b>Per Cent</b>	<b>Count</b>
• How to identify needs on a statewide and comprehensive basis for independent living services	74.1%	43
• Developing and supporting a statewide network of CILs	43.1%	25
• Identifying the entities that are relevant for collaboration for your state’s SPIL	60.3%	35
• Strategies for collaborating with other entities for purposes of the SPIL	72.4%	42
• No training or TA will be needed	3.5%	2
• Other	3.5%	2
	<b>Total</b>	<b>58</b>

<b>Responses “Other”</b>	<b>Count</b>
• <i>Left Blank</i>	56
• How do you strengthen and expand the network of CILs in the state without additional funding? How do you get additional funding?	1
• We review our SPIL progress twice a year at our Quarterly Business meetings to ensure we are meeting our goals and objectives. CIL Directors report to us to ensure that they are meeting the objectives.	1

**Question 3: What training or technical assistance may be needed in your state to implement the Statewideness part of the law? Check all that apply.**

<b>Responses</b>	<b>Per Cent</b>	<b>Count</b>
• Options for the establishment of the SILC – i.e. legislation, executive order, etc.	31.0%	18
• Developing a plan for funding administrative costs	70.7%	41
• Sources of funds that may be used to support the SILC resource plan	79.3%	46
• No training or TA will be needed	6.9%	4
• Other	10.3%	6
	<b>Total</b>	<b>58</b>

<b>Responses “Other”</b>	<b>Count</b>
• <i>Left Blank</i>	52
• In the future, what if the SILC Operating budget exceeds 30% of the state’s Title VII B award?	1
• New not for profit	1

<b>Responses “Other”</b>	<b>Count</b>
• If the DSE changes from the former rehabilitation agency, how can SILC be funded without using Part B funds such as using I&E funds? Also how can the SILC find a new DSE as many SILCs have strained relationships now with their DSU?	1
• Our SILC and the CILs have a strong working relationship and have monthly conference calls to ensure that we are all working together. Our SILC is also embedded in State Statute.	1
• What qualifies as allowable expenses (w/in the federal government)? Our DSU tells us what are allowable expenses on federal grants/contracts (yet I haven’t been able to find these in writing).	1
• We need our VR agency to continue to provide Title I Innovation and Expansion funds, and the VR Director has said he is not inclined to do that since VR plans to get out of IL and no longer run their own IL program.	1

**Question 4: What areas of training and technical assistance do you anticipate will be needed by your SILC concerning the Designation of State Entity part of the law? Check all that apply.**

<b>Responses</b>	<b>Per Cent</b>	<b>Count</b>
• Implementing more autonomy by the SILC	50.0%	29
• Roles and duties of the Designated State Entity	75.9%	44
• Identifying entities that are eligible to be the DSE	56.9%	33
• Strategies for selecting and securing a DSE	63.8%	37
• DSE vs. DSU – understanding the difference	56.9%	33
• Weighing the pros and cons of designating a Designated State Entity that is different from your current DSU to receive and distribute your funds	62.1%	36
• Potential implications of choosing a DSE other than the current DSU including funding for SILC, funding for the IL network, etc.	65.5%	38
• Dealing with the potential loss by the IL network of other funds (e.g. Social Security reimbursement, Innovation and Expansion funds) if they are no longer available to you if you change to a different DSE	62.1%	36
• No training or TA will be needed	1.7%	1
• Other	1.7%	1
	<b>Total</b>	<b>58</b>

<b>Responses “Other”</b>	<b>Count</b>
• <i>Left Blank</i>	57
• This is our only concern changing DSU to DSE, our SILC is a DSE so the ramifications of changing will definitely impact our I&E Funding. We are fortunate to have a great working relationship with our DSU so a lot of thought and contemplation needs to be implemented prior to any changes.	1

**Question 5: What training or technical assistance may be needed in your state to implement the new part of the law that provides for the State retaining not more than 5 percent of Part B funds for administrative costs? Check all that apply.**

<b>Responses</b>	<b>Per Cent</b>	<b>Count</b>
• Addressing this issue in the SPIL development process	62.1%	36
• DSE Budget development	48.3%	28
• How to determine the percentage to be retained by the DSE	56.9%	33
• Strategic transition from the amount your current DSU withholds for administrative costs (if they do withhold funding for that purpose) to “not more than 5%” retention of Part B funds by the DSE for the stated services	60.3%	35
• Strategic transition from a DSU retaining Part B funds to provide direct services (i.e. an IL “field program”) to a DSE withholding “not more than 5%” of Part B funds for the stated services	62.1%	36
• No training or TA will be needed	6.9%	4
• Other	3.5%	2
	<b>Total</b>	<b>58</b>

<b>Responses “Other”</b>	<b>Count</b>
• <i>Left Blank</i>	56
• Definition of “administrative costs” vs. grant management	1
• Current SILC members are unaware of what the DSU retains for administrative cost. Should the SILC be given this amount and should it be reflected in the state plan?	1

**Question 6: What training or technical assistance may be needed by your SILC to implement the Cooperation, Coordination, and Working Relationships section of the law? Check all that apply.**

<b>Responses</b>	<b>Per Cent</b>	<b>Count</b>
• Maximizing the collaboration between the SILC and the CILs	70.7%	41
• Strategies for developing the relationship with the DSE	60.3%	35
• Strategies for modifying the current relationship with the vocational rehabilitation program to the new relationship defined in law if they are not chosen to be the DSE	67.2%	39
• Developing other new collaborations and working relationships that support independent living goals and objectives	79.3%	46
• No training or TA will be needed	3.5%	2
• Other	5.2%	3
	<b>Total</b>	<b>58</b>

<b>Responses “Other”</b>	<b>Count</b>
• <i>Left Blank</i>	55
• Not sure about DSE. Need to understand what they do.	1
• Working with managed care organizations	1
• We have not discussed this and are not quite sure which way we will go. We, at this point, have discussed keeping VR as our DSU.	1

**Question 7: What training or technical assistance would be helpful in order to “promote full access to community life” in the plan? Check all that apply.**

<b>Responses</b>	<b>Per Cent</b>	<b>Count</b>
• How to collect comprehensive/useful needs assessment data to identify areas to be accessed more fully	86.2%	50
• Increased knowledge of ethnic and disability populations	55.2%	32
• Assistance with defining “full access to community life”	51.7%	30
• Guidance on developing effective goals, objectives and indicators	79.3%	46
• No training or TA will be needed	0.0%	0
• Other	10.3%	6
	<b>Total</b>	<b>58</b>

<b>Responses “Other”</b>	<b>Count</b>
• <i>Left Blank</i>	52
• Maybe assistance with defining full access to community life	1
• Not sure	1
• How do we do this when all of our CILs are drastically underfunded and only serve 30 of 99 counties, and of those 30 there are 23 that are underserved?	1
• Strategies for redesigning ILs to be viewed as a supportive and caring environment for under-served cultures.	1
• Specific training to increase knowledge of Native American and disability population, needs assessment, evaluating IL services to these communities.	1
• How to engage civic/diversity groups; or how to sell IL when you can’t offer any IL Services (in other words – the SILC is doing outreach for the IL Network, how do you answer those specific questions and/or understand the relationship between SILCs and CILs?)	1

**Question 8: What training or technical assistance may be needed in your state to implement the new part of the law pertaining to Composition of the Council?**

<b>Responses</b>	<b>Per Cent</b>	<b>Count</b>
• Changing the makeup of the SILC to meet these new requirements	31.0%	18
• Influencing the appointments to the SILC in order to meet the requirements	50.0%	29
• Working with the CILs on reservations to identify a representative to recommend for appointment to the SILC	29.3%	17
• Recruitment strategies	56.9%	33
• Orientation and training strategies	65.5%	38
• Supporting attendance and fully engaging members	65.5%	38
• No training or TA will be needed	8.6%	5
• Other	5.2%	3
	<b>Total</b>	<b>58</b>

<b>Responses “Other”</b>	<b>Count</b>
• <i>Left Blank</i>	55
• We currently meet these requirements.	1
• Did not check any. Wrote university voting from DR in addition	1
• Working with the CIL when it is the only Center in the state? This leaves a 50/50 in the decision making process when the SILC and the Center disagrees. Also why is the DSE an ex officio member of the Council?	1

**Question 9: Does your SILC need any assistance in coming into compliance with the newly clarified requirement concerning number of terms?**

<b>Response</b>	<b>Per Cent</b>	<b>Count</b>
• Yes	15.5%	9
• No	72.4%	42
• Not Sure	12.1%	7
	<b>Total</b>	<b>58</b>

**Question 10: The duty to coordinate activities now provides greater clarity and latitude for coordination than previously available. Broad coordination is now clearly a duty. Does this expansion suggest any ways in which training and TA might be useful to your SILC?**

Response	Per Cent	Count
• Yes, please specify:	46.6%	27
• No	53.5%	31
	Total	58

Responses “Yes, please specify:”	Count
• <i>Left Blank</i>	34
• Developing plan	1
• Encourage training between systems	1
• Fuller definition and then possibly some tips on how to	1
• How does SILC maintain sufficient resources to meet this duty which could be time intensive	1
• How to coordinate transition issues	1
• How to coordinate with transition issues	1
• How to increase and comply with this coordination	1
• I believe we may need additional training in our enhanced role in the plan development.	1
• Implementing provisions under E	1
• Maintain the SPIL, and evaluate the SPIL.	1
• More info on coordination strategies	1
• No requirement for SILC members to serve on SRC	1
• Not sure but probably	1
• Not sure, though	1
• Strategic Planning	1
• The role of the SILC in coordination of activities	1
• Unsure	1
• What is meant by coordinating activities and should members be encouraged to join other boards?	1
• Ideas for evaluating implementation of the State Plan	1
• To identify organizations with which to coordinate	1
• SILC members can benefit from training that helps identify who the other entities are and how they may be related to IL	1
• As the new SPIL Chairperson I want to possess the knowledge skills and abilities to insure full compliance with all laws, rules and	1

Responses “Yes, please specify:”	Count
regulations for the most positive outcomes for all residence receiving services.	
• Training in how to review and monitor implementation of State Plan. Coordinating with other entities that provide IL services.	1
• How to vet and affect cohesive cooperation where urban and rural strategies and objectives can polarize ILC directors around a large and vast state.	1

**Question 11: What specific areas of the Authorities section of the law do you anticipate your SILC will want assistance with? Check all that apply.**

Response	Per Cent	Count
• Working with CILs to coordinate with public and private entities to improve services provided to individuals with disabilities	62.1%	36
• Conducting resource development activities to support SILC responsibilities	84.5%	49
• Conducting resource development activities to support the provision of IL services by CILs.	79.3%	46
• Identifying and implementing other functions the SILC determines to be appropriate for a SILC	69.0%	40
• No training or TA will be needed	1.7%	1
• Other	8.6%	5
	Total	58

Responses “Other”	Count
• <i>Left Blank</i>	53
• Resource development to expand CILs to underserved and rural areas	2
• We have been doing this all along.	1
• Will SILC be encouraged to become nonprofit for fundraising purposes and if so guidance will be needed on how to separate funds and activities. Also will additional staff be needed to follow these new requirements? Will fundraising be optional?	1
• There is a difference in the capacities of SILCs based on funding and whether they are a 501c3 or not. Discussion of capacities and the above would be important. One size does not fit all.	1



**Question 12: Limitation—This section is totally new and may require some re-thinking with regard to how your SILC operates. What specific issues does this generate for your SILC that you will need assistance in addressing? Check all that apply.**

<b>Response</b>	<b>Per Cent</b>	<b>Count</b>
• Activities that would be covered by this limitation	29.3%	17
• How this limitation could affect the SILC vs. the non-profit corporation, if organized as a non-profit	41.4%	24
• No training or TA will be needed	25.9%	15
• Other	3.5%	2
	<b>Total</b>	<b>58</b>

**Question 13: This section affects the availability of funds for the SILC resource plan. What training or technical assistance may be needed in your state to implement this new part of the law? Check all that apply.**

<b>Response</b>	<b>Per Cent</b>	<b>Count</b>
• Addressing this issue in the SPIL development process	74.1%	43
• SILC Resource Plan Development	74.1%	43
• Determining the percentage of Part B funds needed for the SILC Resource Plan	74.1%	43
• How to justify the percentage needed for the SILC Resource Plan if it is determined to be more than 30%	75.9%	44
• No training or TA will be needed	3.5%	2
• Other	12.1%	7
	<b>Total</b>	<b>58</b>

<b>Responses “Other”</b>	<b>Count</b>
• <i>Left Blank</i>	52
• Define “STATE”. Our State will read this as the STATE of_____.	1
• Not sure at this .point.	1
• Usually funded with I&E and Part B, what replaces I&E (without making Part B CILs mad)?	1
• Biggest concern her is that now all Part B goes to CILs for services; if SS Reimb or I&E are removed, the SILC would either shrink drastically or disappear without taking back some Part B. Would CILs agree to that? Probably not.	1
• Does the DSE have any say in the SILC resource plan or will they only allocate the funds? Again with only one Center in the state how is the negotiation handled if there is a disagreement causing a 50/50 split?	1

**Question 14: What other areas related to the changes in the law or in general do you anticipate your SILC will want assistance with in the coming year?**

Response	Count
• Does this apply to SILCs who are 501c3s?	1
• How to implement without the Regulations being written	1
• How to implement without the regulations being written.	1
• New SPIL development including DSE selection as #1.	1
• Overall SILC funding to maintain our operations.	1
• That depends on guidance/regulations that have not yet been issued	1
• The possibility of the SILC becoming the DSE.	1
• We definitely need training on the new laws specifically, and our role and responsibilities. Many of our council members do not have a firm grasp of the IL concept, and don't really understand what they should and should not do. I have tried to initiate training, but only a handful of people come and generally not council members.	1
• If the DSE is a state agency then the funds need to go through the state financial system causing a delay in the funds. How can this issue be resolved and how does the SILC operate while waiting for funds to be allocated?	1
• How to maintain the highest level of SILC control/autonomy over actions of their Executive Director but realizing they are state employees and must be supervised by another state employee.	1
• Interpreting regulations as they are published; making comments on proposed regulations during comment period	1
• How to increase Federal and State dollar allocations. Advocacy strategies for effective communications with legislators.	1