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IL-NET National Training and Technical Assistance Center for Independent Living



Independent Living Research Utilization

www.ilru.org

What You Need to Know About the New State Plan for Independent Living (SPIL): A Comprehensive Overview of the SPIL Instrument and Instructions

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April 30, 2020

Evaluation Survey & Presenter Contact Information

Your feedback on this webinar is important to us. At the end of the presentation you will have the opportunity to complete a brief evaluation survey.

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For the approved SPIL instrument and instructions:

<https://acl.gov/ils-programs>

What You Will Learn...

- The changes to the instrument and instructions;
- The required data needed for each section; and
- The submission deadline details, submission process, and the review and approval process.

What is in the SPIL Template Document?

- Background
- Definitions
- SPIL Development
- SPIL Submittal
- SPIL Review and Approval
- SPIL Amendments
- Instructions by Section
- Appendix A: SPIL Development Process
- Appendix B: SPIL Planning Tools
- Appendix C: Full SPIL Planning Table
- Appendix D: The Conceptual Chain
- SPIL Instrument

Parts of the SPIL

Section 1: Goals, Objectives and Activities

Section 2: Scope, Extent, and Arrangement of Services

Section 3: Network of Centers

Section 4: DSE Responsibilities

Section 5: Statewide Independent Living Council (SILC)

Section 6: Legal Basis and Certifications

Section 7: DSE Assurances

Section 8: Statewide Independent Living Council (SILC)
Assurances and Indicators of Minimum Compliance

Section 9: Signatures

SPIL Submittal

- The SILC must submit the SPIL to ACL/OILP no later than 90 days before the completion date of the previous plan.
- The SPIL must be submitted in the manner directed by ACL/OILP.
- FY 2021 – 2023 Process:
 - Submission Date - 11:59 PM EST on Tuesday, June 30, 2020.
 - Submit to - Regina Blye, ILS Program Officer (PO) by email at Regina.Blye@acl.hhs.gov.
 - Instructions - The email should include the completed new SPIL instrument as a Word document, and the signature page(s) as a PDF document. The two attachments must be submitted as 508 compliant documents.

SPIIL Review and Approval

- The ACL Administrator is responsible for reviewing, and, where all applicable statutory and regulatory requirements have been met, approving, the SPIIL. After approving it, the Administrator shall transmit an approval letter to the State and shall post the approved SPIIL on ACL/OILP's website for public viewing.
- The Administrator will disapprove a SPIIL that does not meet the requirements of Sec. 704. If no resolution has been reached after reasonable efforts, the Administrator may withhold financial assistance until such time that the State submits an approvable plan.

Instructions by Section

- Instructions are provided for each section of the SPIL to ensure SPIL development is thorough and all requirements are met.

Appendix A: SPIL Development Process

- Optional checklist used to determine whether the network met the minimum SPIL development requirements.
- Use is strongly encouraged.

Appendix B: SPIL Planning Tools

- Sample SPIL Logic Model – used during the development process:
 - Mission
 - Goals
 - Activities

<https://www.ilru.org/training/outcome-measures-for-centers-for-independent-living>

Appendix C: SPIL Planning Table

- Sample SPIL Planning Table – used during the development process:
 - Specific Objective
 - Measurable Indicators
 - Geographic Scope
 - Lead Organization
 - Funding Sources
 - Etc.

Training resources for SPIL development can be found at <https://www.ilru.org/search/node/SPIL>

Questions & Discussion

Executive Summary

- This is a concise summary of the SPIL, no more than two pages.
- This is not to duplicate any other portion of the SPIL. You shouldn't cut and paste from other sections.
- Therefore, even though it is inserted here, this section is usually written last. You really can't write it until you have figured out all the sections first.

Section 1: Goals, Objectives and Activities

1.1 Mission of the Independent Living Network as defined by your state

This is the highest outcome in the long term and the SPIL goals and objectives should all be aiming toward achieving this mission.

This should be a concise but visionary statement.

Section 1: Goals, Objectives and Activities

1.2 Goals – immediate outcomes, what you want to achieve, building toward the mission.

Key Concepts

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

1.3 Objectives

Make sure that you include all the requirements in this section:

- Geographic scope
- Desired outcomes
- Target dates
- Measurable Indicators including compatibility with IL Philosophy, the purpose of Title VII Chapter 1
- Use the sample chart to track these elements and how to collect them
- The services in 2.1 will tie back to the objectives

Indicators/Activities

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

- Indicators should be **Specific, Measurable, Achievable, Relevant, Timely (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

Example from Instructions

Mission:

Goals:

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

Example, cont'd.

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.

Example, cont'd. 2

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.

Indicators are required. If you submit your SPIL without them it will be returned.

1.4 Evaluation

This is a new section that is required. Evaluation can only happen if your goals are measurable.

Methods and processes the SILC will use to evaluate the effectiveness of the SPIL including timelines and evaluation of satisfaction of individuals with disabilities.

See sample chart on Page 11. This will cover most of your evaluation plan.

Make sure your Evaluation Plan includes all these requirements

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

Specifically you must identify in your plan:

- Timeline
- Goals (from 1.2 above)
- Objectives (from 1.3 above)
- Data to be collected
- Data collection method
- Organization primarily responsible for data collection (any combination of CILs, DSE, SILC. If more than one, break it down so you can clearly show it.)

Break down specifics as much as you need to so that the network parties are clear on who does what.

One more note about evaluation:

- The SPIL Evaluation plan is not intended to be used to evaluate CIL services and/or compliance with CIL standards and assurances in section 725 of the Act. Compliance by CILs receiving Part C funds is the responsibility of the ACL/OILP. Compliance of CILs receiving Part B funds for general operations is the responsibility of the DSE with respect to the Part B funding.
- The SPIL Evaluation plan is intended to measure how well the activities in the plan make progress in achieving the objectives and subsequently the goals and mission.

Questions & Discussion

1.5 Financial Plan

- Sources, uses of, and efforts to coordinate funding to be used to accomplish the SPIL Goals and Objectives.
- Process for grants/contracts, selection of grantees, and distribution of funds to facilitate effective operations and provision of services.
- This section is much more complete related to consistent reporting.
- ACL/OILP will be checking the amounts of Part B funding for assuring that the SILC has no more than 30% of Part B unless they include justification in section 5.2
- You be reviewed to see if the DSE included their administrative amount of not more than 5%.
- ACL/OILP will also be checking for the non-federal 10% match.

Note: if you have an earlier version it indicates match under Part B. Match is not required there – remove it.

Use the financial plan table

| Fiscal Years: | | | | | |
|---|---|--------------------|-------------------------------|------------------------------|--|
| Sources | Projected Funding Amounts and Uses | | | | |
| | SILC Resource Plan | IL Services | General CIL Operations | Other SPIL Activities | Retained by DSE for Administrative Costs (applies only to Part B funding) |
| Title VII Funds Chapter 1, Part B Chapter 1, Part C | | | | | |
| Other Federal Funds Sec. 101(a)(18) of the Act (Innovation and Expansion) Social Security Reimbursement Other | | | | | |
| Non-Federal Funds (include the match amount in non-federal funds) State Funds Other | | | | | |

The financial plan has two required parts – table and narrative

The narrative must include:

- Sources, uses of, and efforts to coordinate funding to be used to accomplish the SPIL Goals and Objectives.
- Process for grants/contracts, selection of grantees, and distribution of funds to facilitate effective operations and provision of services.
- Describe the financial plan for the use of Federal and non-Federal funds to meet the objectives identified in the SPIL.

The amounts for the distribution of funds should be included in the narrative section. If you don't specify who receives what funds it will be difficult to assure funds are spent according to the SPIL.

Section 2: Scope, Extent and Arrangements of Services

2.1 Services

- Services to be provided to persons with significant disabilities that promote full access to community life including geographic scope, determination of eligibility and statewideness.
- Complete the SPIL Instrument table (pg. 31 of the instrument).
- Indicate the types of IL services to be provided to meet the objectives identified in section 1.3 of this SPIL
- Indicate whether the services will be provided by the CILs or by the DSE (directly and/or through contract or grant) or other entity.
- Include the funding for each service.
- You may include a map of service areas.

2.2 Outreach

Write a narrative describing:

- Definitions of “unserved” and “underserved” for outreach
- How unserved and underserved are determined
- How services will be provided (including the minority groups in urban and rural populations)
- Targeted populations and/or geographic areas
- Outreach activities and methods to be conducted and who will conduct each
- The CILs each have their own outreach plans. This section is to address statewide outreach efforts and is to be separate from and coordinated with, but not replacing, the CILs outreach plans.

This will be limited to two pages.

2.3 Coordination of services and cooperation among programs

Write a narrative describing the plans for coordination and cooperation between SILC, CILs, and DSE and with other entities, programs and organizations.

You must stay within two pages.

Section 3: Network of Centers

3.1 Existing centers.

You will develop a chart that includes all elements to be approved. (The example in the instructions does not include funding sources. You need to add the column for funding to the chart.)

You are required to include:

- Legal name of the CIL
- Geographic area/counties served by the CIL
- Current sources of funding – not including amounts (Part B, Part C, State General Revenue, Other Federal, Other)
- Oversight process
- Oversight entity
- SPIL Signatory

Section 3.1 Existing Centers has two required parts — chart and narrative

- You need to explain in the narrative what your CIL network is, bearing in mind that those CILs included in the network should be those eligible to sign the SPIL.
- You need to accurately describe how the services are configured now.

3.2 Expansion and Adjustment of Network

All sections are required in this narrative.

Plan and priorities for use of funds.

- List by funding source whether current, increased or one-time, including
 - Part B funds,
 - Part C funds,
 - State funds,
 - other funds
- Methodology for distribution of funds.
- Use of funds to build capacity of existing Centers, establish new Centers, and/or increase statewideness of Network.

3.2 Expansion and Adjustment of Network, cont'd.

Provide a detailed description (narrative) 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:

- Definition of served, unserved, and underserved which agrees with Section 2.2
- 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.)

Expansion and Adjustment of Network, cont'd. 2

- 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.”

Remember: The SPIL may be amended by agreement of SILC and a majority of the CILs. If details are not specific enough, there could be significant delays in the distribution of new funding.

Section 4.2 Grant Process/Distribution of Funds

Narrative must include the processes, policies, and procedures to be followed by the DSE in the awarding of grants of Part B funds including:

- Process for soliciting proposals
- Development of format for proposals
- Process for reviewing proposals
- 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 SILC and the CILs complete this section with input regarding state processes.)

Section 4.3 Oversight Process for Part B Funds

Describe the oversight process for

- Part C (alone or in combination with Part B or other funds) oversight by ACL/OILP
- Part B (when no Part C is received) oversight by DSE
- Other funds included in 1.4 Financial Plan
- 723 States both Part C and Part B by DSE

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.

4.4 Administration and Staffing provided by DSE

This narrative section will include:

- 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, a description of how the SILC will hire, fire, and supervise such staff.
- When DSE employees serve as staff to the SILC, a description of 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.

4.5 State Imposed Requirements

These are State-imposed requirements contained in the provisions of this SPIL including:

- State law, regulation, rule, or policy relating to the DSE's administration or operation of IL programs
- Rule or policy implementing any Federal law, regulation, or guideline that is beyond what would be required to comply with 45 CFR 1329
- That limits, expands, or alters requirements for the SPIL
- 45 CFR 1329.17(g).

State Imposed Requirements, cont'd.

- The narrative should include any requirements imposed by the State that are in addition to the Rehabilitation Act and the IL regulations
- The narrative should describe how the DSE will ensure compliance with state-imposed regulations without restricting the autonomy of the SILC in fulfilling its duties, authorities and responsibilities.

If your state falls under 723 (majority of state funds)

4.7 (723 States only) is a narrative to describe:

- The order of priorities for allocating funds
- How the agreement of the SILC and CILs was securing
- Any differences from the priorities in the regulations
- How state policies, practices, and procedures are consistent with 45 CFR 1329.5, 1329.6, & 1329.22.

Further, 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
- Any differences for continuation funding vs. new awards.

Section 5: Statewide Independent Living Council

5.1 How the SILC is established and how SILC autonomy is assured.

This narrative should describe:

- The establishment of the SILC; the legal mechanism by which the SILC was established (i.e. executive order, legislation, etc.)
- Placement of the SILC. Where is it located organizationally and fiscally?
- The organizational status of the SILC (nonprofit or other)
- How autonomy and independence from the DSE and all other state agencies is assured

Section 5.2 SILC Resource Plan

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

- Sources and amounts of funding
- Staff/administrative report
- In-kind

Describe how the resources are necessary and sufficient to ensure the capacity of the SILC to fulfill all the duties and selected authorities (section 705 (c) of the Act.

You are not required to present a detailed SILC budget.

5.2 SILC Resource Plan, cont'd.

You will describe in narrative the process used to develop the Resource Plan, including all of the following:

- How did the SILC, CILs (if the SILC uses Part B funds) and DSE determine the amounts and sources of resources to be included in the plan?
- What is the process used for disbursement of the funds to facilitate effective operations of the SILC, including processes to ensure timeliness and efficiency, prevent undue hardship on the SILC and ensure continual, uninterrupted operations and effectiveness of the SILC?
- If your SILC retains more than 30% of the funds, you must justify that expenditure here. See Section 1.5.

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.

Section 5.3 Maintenance of SILC

Describe how the State will maintain the SILC over the course of the SPIL, including:

- The process used by the state to appoint members to the SILC who meet the composition requirements is section 705(b).
- The appointment process and how the state ensures the SILC composition and qualification requirements are met
- How the chair is selected
- How term limits are maintained
- How vacancies are filled.
- How SILC staffing requirements are addressed.

Concisely describe or cite relevant written policies, procedures, by-laws, technical assistance and monitoring activities or other practices.

Section 5.3 Maintenance of SILC, cont'd.

Describe how the State will ensure that:

- 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 the duties and authorities
- The resources provided are necessary and sufficient to ensure the SILC has the capacity to fulfill its statutory duties and authorities.

Signatures

- Section 6 verifies all the entities with authorities and responsibilities for the SPIL
- Section 7 contains the DSE assurances which detail the roles and responsibilities of the DSE. These assurances are also found on the DSE Notice of award.
- Section 8 includes the assurances, which detail the functions, authorities and requirements for operating as a SIL and the Indicators of Minimum Compliance which are reviewed and signed.
- Section 9 needs to contain a place for the chair and all the signatories listed in Section 3, and at least 51% of the directors of the identified CILs in the network should sign. Even if a CIL has more than one grant, they only get one signature here.

Questions & Discussion

Final Questions and Evaluation Survey

Any final questions?

Directly following the webinar, you will see a short evaluation survey to complete on your screen. We appreciate your feedback!

https://usu.co1.qualtrics.com/jfe/form/SV_6mVhiRFhsyv1OVD

IL-NET Attribution

The IL-NET is supported by grant numbers 90ILTA0001 and 90ISTA0001 from the U.S. Administration for Community Living, Department of Health and Human Services, Washington, D.C. 20201. Grantees undertaking projects under government sponsorship are encouraged to express freely their findings and conclusions. Points of view or opinions do not, therefore, necessarily represent official Administration for Community Living policy.