

*We create opportunities for independence for people with disabilities through research, education, and consultation*

---



**Independent Living Research Utilization**

**[www.ilru.org](http://www.ilru.org)**

# IL-NET

CIL-NET · SILC-NET

## Process for SPIL Formulation under the Workforce Innovation and Opportunity Act (WIOA)

September 10, 2015

*Presenters:*

**Ann McDaniel**

**Brad Williams**

## What the Law Says

- The State Plan for Independent Living (Sec. 704)
- Joint Development
  - By the SILC and CILs in the State
  - After public input from individuals with disabilities
- Signatures
  - Chairperson of the SILC, on behalf of the SILC
  - Director of DSE
  - Not less than 51% of directors of the CILs in the state

## What the Law Says cont'd.

- Periodic Review and Revision
  - Not less than every 3 years
  - Needs in the State for:
    - Provision of IL services
    - Development and support of statewide network of CILs
    - Working relationships & collaboration between CILs, programs that provide IL services, other community-based organizations and entities
- Date of Submission
  - Have to submit 90 days before completion date of the preceding plan (next SPIL due June 30, 2016)

## What the Law Says cont'd. 2

- Statewideness
  - Strategies for providing IL services on a statewide basis to the greatest extent possible
- SILC
  - Provide for establishment of SILC
  - Plan for funding administrative costs of SILC (SILC Resource Plan)
- Designation of State Entity
  - “The plan shall designate a State entity of such State (referred to in this title as the ‘designated state entity’) – as the agency that, on behalf of the State, shall –

## What the Law Says cont'd. 3

- a) Receive, account for, and disburse funds received by the State under this chapter based on the plan;
- b) Provide administrative support services for a program under part B, and a program under part C in a case in which the program is administered by the State under section 723;
- c) Keep such records and afford such access to such records as the Administrator (of ACL) finds to be necessary with respect to the programs;
- d) Submit such additional information or provide such assurances as the Administrator may require with respect to the programs; and
- e) Retain not more than 5% of the funds received by the State for any fiscal year under Part B for the performance of the services outlined in paragraphs (1) through (4)."

## What the Law Says cont'd. 4

- How will the DSE indicate agreement to fulfill these responsibilities?

## What the Law Says cont'd. 5

- Objectives
  - Specify objectives to be achieved under the Plan
  - Establish timelines for achievement of the objectives
  - Explain how the objectives are consistent with and further the purpose of this chapter
- IL Services
  - IL services will be provided
    - To individuals with significant disabilities
    - Consistent with the Plan



## What the Law Says cont'd. 6

- Scope & Arrangements (of IL Services)
  - What services will be provided
  - How services will be provided (by whom)
- Network (of CILs that comply with Sec. 725)
  - Set forth a design for the establishment of a statewide network of centers for independent living that comply with the standards and assurances set forth in section 725

## What the Law Says cont'd. 7

- 722 vs. 723
  - Is State a 722 or 723 State?
  - If a 723 State (see Sec. 723) –
    - Include policies, practices, and procedures governing:
      - the awarding of grants to CILs
      - oversight of CILs

## What the Law Says cont'd. 8

- Cooperation, Coordination, and Working Relationships Among Various Entities
  - Steps that will be taken to maximize such among:
    - The SILC
    - The CILs
    - The DSE
    - Other
      - state agencies or entities represented on the SILC
      - other councils that address the needs and issues of specific disability populations
      - other public & private entities determined appropriate by the SILC

## What the Law Says cont'd. 9

- Coordination of Services
  - How services funded under the plan will be coordinated with (and complement) other services to avoid unnecessary duplication with other programs:
    - Federal
    - State
    - Local
- Coordination Between Federal and State Sources (of funding)
  - Describe efforts to coordinate Federal and State funding for:
    - CILs
    - IL Services

## What the Law Says cont'd. 10

- Outreach
  - Set forth steps to be taken to outreach to:
    - Unserved populations
    - Underserved populations
    - Including minority groups, urban, and rural populations
- Requirements for service providers

## What the Law Says cont'd. 11

- Evaluation
  - Method for periodic evaluation of
    - Effectiveness of plan in meeting objectives
    - Consumer satisfaction
- Promoting Full Access to Community Life

## What the Law Says cont'd. 12

- SILC Role in SPIL Development (Sec. 705 (c))
  - Duties
  - Authorities
  - Limitation
- Develop the SPIL Jointly with CILs
- Monitor, review, and evaluate the implementation of the SPIL
- Submit reports to the Administrator

# QUESTIONS???



# Steps to Formulate the SPIL

- Tasks that must be accomplished
- Prioritize Tasks
- Establish TimeLine for completing tasks
  - Work backward from the submission deadline
  - Allow adequate time for each step

## Steps to Formulate the SPIL cont'd.

- Identify who will develop the SPIL (the SPIL Team)
  - SILC Chairperson
  - Other SILC members
  - CIL Directors
  - Other CIL representatives (staff, board, consumers)
  - SILC director/staff?
  - Should the DSE be included?\*
  
- \*See ACL guidance "Program Information: ILA PI-15-01 at <http://www.ilru.org/resources-wioa-implementation> on "Selection of the Designated State Entity (DSE)"

## Steps to Formulate the SPIL cont'd. 2

- Identify the DSE
  - What process will be used to:
    - Evaluate potential DSEs?
    - Negotiate with potential DSEs?
    - Research State requirements for establishing the DSE
    - Reach agreement

## Steps to Formulate the SPIL cont'd. 3

- Solicit Public Input
  - Identify method for soliciting public input
    - Surveys
    - Focus groups
    - Public forums
    - Facilitated public meetings
    - Other?
  - Compile all public input
  - Provide all input received to all involved in the development of the SPIL

## Steps to Formulate the SPIL cont'd. 4

- Draft the SPIL
  - Identify all tasks to be completed
  - Divide the work among the team

## Develop the Content of the SPIL

- What do you want to accomplish (Objectives)
  - Be specific
  - Make sure objectives are measurable
  - Include indicators of progress and/or achievement

## Develop the Content of the SPIL cont'd.

- What services will be provided?
  - What services are currently being provided?
  - Consider unmet needs
  - Listen to public input
  - What can you realistically do?

## Develop the Content of the SPIL cont'd. 2

- Who will provide the services?
  - Who is currently providing services?
  - Who can provide the identified services?
  - All providers must meet the Requirements in Sec. 704 (m)



## Develop the Content of the SPIL cont'd. 3

- How will the Part B money be used?
  - How is Part B money currently being used?
  - Where will funding be needed to accomplish objectives?
  - How much funding will be needed for each objective and/or service?
  - What can you realistically do with the funding available?

## Develop the Content of the SPIL cont'd. 4

- Statewide Network of CILs
  - What is the existing network of CILs?
    - How many CILs do you have?
    - Where are the current CILs located?
    - What are the service areas of the current CILs?
  - What are the unserved areas?
    - Where are new CILs and/or satellites needed?
    - What is the current capacity to establish a CIL/satellite in each identified area?
    - How much funding would be needed?

## Develop the Content of the SPIL cont'd. 5

- Statewide Network of CILs
  - What is the minimum funding level needed for existing CILs?
  - What is the minimum funding level needed to start a new CIL?
  - Design the ideal network
    - Are current CILs' service areas realistic?
    - Prioritize where to put new CILs and/or satellites
    - Prioritize use of new funding if received
    - Outline how new funding will be distributed

## Develop the Content of the SPIL cont'd. 6

- SILC Resource Plan
  - What amount is needed?
  - What funding is currently being used?
  - What can potential DSEs bring to the SILC Resource Plan?
  - If Part B funds are used:
    - Is 30% adequate?
    - If more than 30% is needed – how to justify in SPIL?
  - What additional sources of funding are available?

# QUESTIONS???

## Steps to Formulate the SPIL cont'd. 7

- First Full Draft of the SPIL
  - Identify who will take responsibility for merging all the work into SPIL format
  - Full team review the merged/draft SPIL to ensure all work and agreements are captured
  - This is the first full draft of the SPIL

## Steps to Formulate the SPIL cont'd. 8

- Solicit Feedback
  - Determine format(s) for soliciting and accepting feedback/comments
  - Feedback from SPIL Team & their constituencies:
    - SILC members
    - CILs
      - Directors
      - Staff
      - Board members
      - Consumers
    - DSE

## Steps to Formulate the SPIL cont'd. 9

- Solicit Feedback, cont'd.
  - Public Comments
    - Public meetings
    - On-line availability of draft SPIL
    - On-line format to submit comments
    - Other?
  - Provide notice to the public that comments are being accepted on the draft SPIL & provide a deadline



## Steps to Formulate the SPIL cont'd. 10

- Finalize Draft
  - All comments received provided to the SPIL team
  - Team reviews and considers all comments received
  - Any revisions needed in response to comments are identified & made
  - Final draft provided to the SPIL team, SILC, CILs, and DSE

## Steps to Formulate the SPIL cont'd. 11

- Process for CILs' Approval
  - Network of CILs identified in the SPIL included in process
  - Process for CILs to review the Final SPIL Draft
  - Process for CILs to indicate agreement and/or concerns

## Steps to Formulate the SPIL cont'd. 12

- Process for SILC Approval
  - Final SPIL Draft provided to all SILC members
  - Draft discussed at a full SILC meeting
  - Voting SILC members vote whether to approve the draft
  - Voting SILC members authorize Chairperson to sign the SPIL on their behalf if it is approved

## Steps to Formulate the SPIL cont'd. 13

- Process for Securing Signatures
  - SILC Chairperson
    - Representing the SILC
    - At the direction of the SILC
  - CIL Directors
    - At least 51% of the directors of the CILs in the network identified in the SPIL must sign
    - How many are allowed to sign?
    - Can all the CIL directors sign?
  - DSE Director

## Steps to Formulate the SPIL cont'd. 14

- Submission of SPIL
  - Who will submit the SPIL to ACL?
  - What process will be used to submit the SPIL?
  - Who will have access to that process?

# QUESTIONS???

# Where West Virginia is in the Process

# SPIIL Team Established

- 3 SILC members
- Former SILC Chairperson
- All CIL Directors
- DSU Liaison
- SILC Executive Director



## Timeline Established

- SPIL Team Established – April 2015
- Public Forums Held – August/September 2015
- Begin Drafting SPIL Content – October 2015
- SPIL Draft to SPIL Partners – February 2016
- Public Meetings/Comment Period – March 2016
- Final SPIL Draft to Partners for Approval – May 2016
- Approval of SPIL – June 1, 2016
- Signatures Secured – June 15, 2016
- SPIL Submitted to ACL – June 22, 2016

## Additional Progress Made

- Dates & Locations set for Public Forums to gather Input
- Review of Consumer Satisfaction/Needs information

# New York SILC SPIL Development Timelines

# NY SPIL Development Timeline

- (November 2014 – June 2015) Assess Impact of Current SPIL: Committees evaluate SPIL objectives. SPIL Evaluation report is drafted, reviewed by committee, and final report submitted to council.
  - Link to 2014 SPIL Evaluation report:  
[http://www.nysilc.org/images/2014\\_SPIL\\_Evaluation\\_Report\\_Final\\_5-28-15.docx](http://www.nysilc.org/images/2014_SPIL_Evaluation_Report_Final_5-28-15.docx).
- (February – October 2015) Convene a Needs Assessment Committee (NAC) to work on a key questions, respond with data and survey responses, and produce a draft and final report by October.
  - Link to 2012 Statewide Needs Assessment report:  
[http://www.nysilc.org/primary\\_source/FINAL-2012-NYSILC-Needs-Assessment-Report-10-11-12.pdf](http://www.nysilc.org/primary_source/FINAL-2012-NYSILC-Needs-Assessment-Report-10-11-12.pdf).

## NY SPIL Development Timeline cont'd.

- (May – July 2015) SPIL Committee starts process to develop outreach materials to obtain public input which starts in September.
  - Materials: Public hearing notice, facilitation outline, CIL focus group packet, background material, and communications for distribution, posting and messaging.
- (September – October 2015) Receive public input on SPIL.
  - Methods: Public hearings, SPIL facilitated sessions at public events (conferences), CIL focus groups, written comments.
  - Facilitation outline utilized for all methods.

## NY SPIL Development Timeline cont'd. 2

- (November 2015) Needs assessment report reviewed and accepted at full council meeting.
- (November – December 2015) SPIL Committee reviews public input and needs assessment priorities, identifies final priorities, objectives and funding.
- (December 2015 - January 2016) Key Elements of plan sent out for public comment. Changes made accordingly.

# NY SPIL Development Timeline cont'd. 3

## NEW STEPS CONSIDERING WIOA

- (January – February 2016) Draft SPIL
- (late February 2016) Review highlights of draft SPIL on webinar
- (March 2016) CIL Directors review and approve draft SPIL
- (April 2016) SILC review and approval of draft SPIL
- (April – May 2016) Technical review of draft SPIL

## NY SPIL Development Timeline cont'd. 4

- (June 2016) Partners sign draft SPIL: SILC Chair signs on behalf of SILC, CIL Directors sign a form (TBD), and DSE signs and affirms administrative duties.
- (late June 2016) Signed SPIL transmitted to ACL by June 30th.
- (August – September 2016) Review draft SPIL with ACL. Possible negotiation & technical edits.
- (By October 2016) New SPIL Approved by ACL.



# What Did NY Have to Add to or Revise the SPIL Formulation Process?

- Review of the draft SPIL with IL network partners and stakeholders via a webinar for general education and understanding
- A CIL Director voting process
- An arbitration process (if needed)
- Additional time and flexibility, along with an appeal for cooperation in an environment of change

## Contact Information

- Ann McDaniel – [ann.meadows@wvsilc.org](mailto:ann.meadows@wvsilc.org)  
West Virginia SILC  
PO Box 625  
Institute, WV 25112-0625
- Brad Williams – [bradw@nysilc.org](mailto:bradw@nysilc.org)  
New York SILC  
111 Washington Avenue, Suite 101  
Albany, NY 12210

# Evaluation

Please click the link below to complete an evaluation of this program:

<http://www.surveygizmo.com/s3/2247119/SILC-NET-Webinar-Evaluation-September-10-2015>

## SILC-NET Attribution

Support for development of this training was provided by the Department of Health and Human Services, Administration for Community Living under grant number 90TT0001-01-00. No official endorsement of the Department of Health and Human Services should be inferred. Permission is granted for duplication of any portion of this PowerPoint presentation, providing that the following credit is given to the project:

**Developed as part of the SILC-NET, a project of the IL-NET, an ILRU/NCIL/APRIL National Training and Technical Assistance Program.**