

# State Plan for Independent Living (SPIL)

## Rehabilitation Act of 1973, as Amended, Chapter 1, Title VII

### **Part B - Independent Living Services**

#### Part C - Centers for Independent Living

#### **STATE: WISCONSIN**

#### **FISCAL YEARS: 2021-2024**

EFFECTIVE DATE: OCTOBER 1, 2020

PER GUIDANCE FROM ACL, THE SPIL WAS EXTENDED AN ADDITIONAL YEAR, EFFECTIVE  
OCTOBER OF 2022.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number (OMB 0985-0044). Public reporting burden for this collection of information is estimated to average 240 hours per response, including time for gathering and maintaining the data needed and completing and reviewing the collection of information. The obligation to respond to this collection is required to receive financial assistance (Title VII of the Rehabilitation Act of 1973, as amended).

## **Executive Summary**

The focus of Wisconsin's State Plan for Independent Living (SPIL) 2021-2024 is on strengthening the Wisconsin Independent Living Network (WILN) and providing quality Independent Living (IL) core services on a statewide basis. WILN is comprised of Wisconsin's eight Independent Living Centers (ILCs), the State Independent Living Council (SILC), and the Wisconsin Coalition of Independent Living Centers (WCILC). The mission for the SPIL embodies this focus and is: Through the provision of quality IL services throughout the state of Wisconsin, ensure that people with disabilities get to live the lives they choose.

Wisconsin's SILC has been in a period of transition the past two years, due SILC members reaching term limits and staff transition. Wisconsin SILC has new membership and SILC member training and onboarding will be a priority during this three-year SPIL period.

Training and onboarding for SILC members will focus on the Wisconsin SILC building collaborative relationships with Wisconsin's eight ILCs and WCILC. This will allow the Wisconsin SILC to effectively evaluate the SPIL and lead WILN in achieving the goals as outlined in the SPIL.

The SPIL development process has been a good first step in the Wisconsin SILC developing relationships with WILN and being able to apply skills and knowledge gained through Independent Living Research Utilization training and SILC Congress to fulfill its roles and responsibilities as outlined in the SILC assurances.

The SPIL goals emphasize two main themes, fulfilling the mission outlined in the SPIL and improving collaboration of WILN. The 2021-2024 goals are:

- **Goal 1:** Wisconsin's eight ILCs will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
- **Goal 2:** All of Wisconsin's eight ILCs will provide IL core services of the highest quality on an annual basis.
- **Goal 3:** Wisconsin IL Network actively engages in disability systems advocacy at the state and national levels on an annual basis.
- **Goal 4:** Strengthen coordination of the Wisconsin IL Network over the next three years.

Goal 4 in the SPIL was developed with collaboration and coordination of WILN as its focus. The Wisconsin SILC plans to achieve this goal by:

- Hosting a retreat for WILN, where partners will outline roles and responsibilities, and determine how to work together effectively and cohesively.

- Having Wisconsin SILC members increase the frequency of their contact with the respective ILCs that serve the county in which they reside so they understand local ILC and consumers' needs.
- Attending trainings offered related to onboarding of new SILC and WILN members and attend continuous training offered by WILN partners.

The other area the Wisconsin SILC will be focused on this SPIL three-year period is the Financial Plan. Although Wisconsin provides IL core services on a statewide basis, more funding is needed to reach underserved populations and geographic regions of the state more efficiently. WILN will be pursuing an increase in state and federal resources to provide IL core services to more people with disabilities statewide.

For the 2021-2023 SPIL, the SILC Resource Plan totals \$161,783 on an annual basis, for a total of \$485,349 for the three-year SPIL period. This funding will be allocated to the Wisconsin SILC to support its operations, meet SILC assurances, evaluate the SPIL, and achieve SPIL goals. Per guidance from ACL, Federal Fiscal Year 2024 SILC Resource Plan and ILC funding allocations were added to the SPIL.

WCILC is allocated \$65,000 on annual basis, for a total of \$195,000 for the three-year SPIL period for reporting on WILN SPIL goals.

The IL Services and General CIL Operations is allocated amongst Wisconsin's eight ILCs. ILCs receive Part C funds and CARES Act funds directly. The Designated State Entity (DSE) allocates Part B, Independent Living state general purpose revenue, and Social Security Reimbursement funds to the ILCs.

The DSE issues funds to the ILCs, WCILC, and Wisconsin SILC as outlined in the SPIL Financial Plan. The DSE allocates Innovation and Expansion funds, Part B funds, and Part B match funds on a federal fiscal year basis (October 1 – September 30). The DSE allocates the Social Security Reimbursement funds and state general purpose revenue on a state fiscal year basis (July 1 – June 30). Prior to receiving these funds and related contracts the DSE will issue grant continuation packets to be completed by the SILC, WCILC, and ILCs. The grant continuation packet is issued 60 days prior to the start of the fiscal year. The grant continuation packets include a budget form to be completed, scope of work, and quarterly program and budget reports. The grant packets are due to the DSE 30 days prior to the start of the fiscal year. Grant funds are available at the start of the fiscal year and are available to draw upon on a monthly basis.

The ILCs receive Part C and CARES Act funds directly from the federal government.

## **Section 1: Goals, Objectives and Activities**

### **1.1 Mission:**

#### **Mission of the Independent Living Network and the SPIL.**

The Wisconsin Independent Living Network (WILN) is comprised of Wisconsin's eight Independent Living Centers (ILCs), the State Independent Living Council (SILC), and the Wisconsin Coalition of Independent Living Centers (WCILC).

The mission for the Wisconsin State Plan for Independent Living (SPIL) 2021 – 2024 and WILN is: Through the provision of quality Independent Living (IL) services throughout the state of Wisconsin, ensure that people with disabilities get to live the lives they choose.

### **1.2 Goals:**

#### **Goals of the IL Network for the three-year period of the plan.**

The SPIL goals of the Wisconsin Independent Living Network (WILN) for 2021 – 2024 are:

- **Goal 1:** Wisconsin's eight Independent Living Centers (ILCs) will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
- **Goal 2:** All of Wisconsin's eight ILCs will provide IL core services of the highest quality on an annual basis.
- **Goal 3:** WILN actively engages in disability systems advocacy at the state and national levels on an annual basis.
- **Goal 4:** Strengthen coordination of WILN over the next three years.

### **1.3 Objectives**

#### **Objectives for the three-year period of the plan – including geographic scope, desired outcomes, target dates, and indicators. Including compatibility with the purpose of Title VII, Chapter 1.**

- **Goal 1/Desired Outcome:** Wisconsin's eight Independent Living Centers (ILCs) will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
  - **Objective 1.1:** All ILCs will maintain their current total number of unduplicated Information and Referrals (I&Rs) and Consumer Information Files (CIFs) for IL core services per each ILC service area.

- **Geographic Scope:** Statewide by ILC service area.
  - **Target Date:** On an annual basis maintain the number of individuals who receive IL core services.
  - **Indicator 1.1:** The total of unduplicated I&Rs and CIFs for each ILC service area.
  - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
- **Goal 2/Desired Outcome:** All of Wisconsin’s eight ILCs will provide IL core services of the highest quality on an annual basis.
  - **Objective 2.1:** Seventy-five percent of consumers receiving IL core services have “successfully completed all goals” at the time of the closure of their individual CIF.
    - **Geographic Scope:** Statewide by ILC service area.
    - **Target Date:** On an annual basis ILCs provide IL core services of the highest quality.
    - **Indicator 2.1:** Percentage of consumers meeting goals at time of CIF closure.
    - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
  - **Objective 2.2:** On annual basis at least one ILC will complete a Quality Indicators for Independent Living Services (QUILS) Peer Review.
    - **Geographic Scope:** Statewide by ILC service area.
    - **Target Date:** On an annual basis ILCs provide IL core services of the highest quality.
    - **Indicator 2.2:** Number of QUILS Peer Reviews completed.
    - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
- **Goal 3/Desired Outcome:** Wisconsin IL Network (WILN) actively engages in disability systems advocacy at the state and national levels on an annual basis.
  - **Objective 3.1:** Develop and implement a WILN three-year disability systems advocacy plan.
    - **Geographic Scope:** Statewide and National.
    - **Target Date:** On an annual basis IL Network participates in disability advocacy.

- **Indicator 3.1:** Percentage of WILN engaged in disability systems advocacy goals.
    - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
  - **Objective 3.2:** Use the annual consumer barriers survey data to prioritize the disability systems advocacy plan.
    - **Geographic Scope:** Statewide by ILC service area.
    - **Target Date:** On an annual basis WILN participates in disability advocacy.
    - **Indicator 3.2:** Number of annual consumer barriers surveys completed.
    - **Compatibility with the purpose of Title VII, Chapter 1:** Relates to IL services and CILs.
  - **Objective 3.3:** Encourage participation in systems advocacy activities.
    - Geographic Scope: Statewide by ILC service area.
    - Target Date: On an annual basis WILN participates in disability advocacy.
    - Indicator 3.3: Number of ILC/SILC staff and board members engaged in systems advocacy activities.
    - Indicator 3.4: Number of consumers that identify advocacy goals in Independent Living Plans (ILPs)
- **Goal 4/Desired Outcome:** Strengthen coordination of WILN over the next three years
  - **Objective 4.1:** Develop and implement a WILN three-year collaboration plan that includes, when appropriate, partnership with the Designated State Entity (DSE) that has measurable outcomes.
    - **Geographic Scope:** Statewide.
    - **Target Date:** Within three years host a retreat and provide ongoing training to Council members. SILC members will have contact with their local ILC on an annual basis.
    - **Indicator 4.1:** A retreat of the WILN, along with the DSE, where partners will outline roles and responsibilities and determine how to effectively work cohesively together.
    - **Indicator 4.2:** Frequency of contacts between Wisconsin SILC members and the respective ILCs that serve the county in which they reside.

- **Indicator 4.3:** Number of trainings offered to members of the WILN related to onboarding of new SILC Members and continuous training of IL Network partners.
- **Compatibility with the purpose of Title VII, Chapter 1:** Relates to CILs.

## **1.4 Evaluation**

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

The Wisconsin SILC will monitor, review, and evaluate the SPIL using the following agreed to performance measures:

- **Goal 1:** Wisconsin's eight Independent Living Centers (ILCs) will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
  - **Objective 1.1:** All ILCs will maintain their current total number of unduplicated Information and Referrals (I&Rs) and Consumer Information Files (CIFs) for IL core services per each ILC service area.
    - **Indicator 1.1:** The total of unduplicated I&Rs and CIFs for each ILC service area.
    - **Evaluation Plan**
      - *Reporting/Evaluation:*
        - Wisconsin SILC will receive quarterly reports on these indicators.
        - Wisconsin SILC will receive a copy of each ILC's annual Program Performance Report.
      - *Data Source:*
        - Statewide consistent data collection by using the same Management Information System (MIS)
      - *Data Points:*
        - Number of open files receiving one or more IL core services per ILC service area.
        - Number of unduplicated callers for Information and Referral services per ILC service area.
      - *Goal Leads:*
        - WCILC, ILCs
- **Goal 2:** All of Wisconsin's eight ILCs will provide IL core services of the highest quality on an annual basis.



- **Objective 2.1:** Seventy-five percent of consumers receiving IL core services have “successfully completed all goals” at the time of the closure of their individual CIF.
  - **Indicator 2.1:** Percentage of consumers meeting goals at time of CIF closure.
- **Objective 2.2:** On annual basis at least one ILC will complete a Quality Indicators for Independent Living Services (QUILS) Peer Review.
  - **Indicator 2.2:** Number of QUILS Peer Reviews completed.
    - **Evaluation Plan**
      - *Reporting/Evaluation:*
        - Wisconsin SILC will receive quarterly reports on these indicators.
        - Wisconsin SILC receive a pre- and post-survey assessment of QUILS Peer Review, annually.
        - Wisconsin SILC will receive a copy of each ILC’s annual Program Performance Report.
      - *Data Sources:*
        - Statewide consistent data collection by using the same Management Information System (MIS)
        - QUILS Peer Review tool and process
      - *Data Points:*
        - Percentage of consumers receiving IL core services meeting all their goals at CIF closure per ILC service area.
        - QUILS Peer Review pre- and post-survey assessment.
      - *Goal Leads:*
        - WCILC, ILCs
- **Goal 3:** Wisconsin IL Network (WILN) actively engages in disability systems advocacy at the state and national levels on an annual basis.
  - **Objective 3.1:** Develop and implement an IL Network three-year disability systems advocacy plan.
    - **Indicator 3.1:** Percentage of Wisconsin IL Network engaged in disability systems advocacy goals.

- **Objective 3.2:** Use the annual consumer barriers survey data to prioritize the disability systems advocacy plan.
  - **Indicator 3.2:** Number of annual consumer barriers surveys completed.
    - **Evaluation Plan**
      - *Reporting/Evaluation:*
        - Wisconsin SILC will receive quarterly reports on these indicators.
        - Annual consumer barriers survey data.
      - *Data Sources:*
        - Annual consumer barriers survey data
        - WCILC quarterly reports
      - *Data Point:*
        - Participation of Wisconsin IL Network members in disability systems advocacy.
      - *Goal Lead:*
        - WCILC
- **Objective 3.3:** Encourage participation in systems advocacy activities.
  - **Indicator 3.3:** Number of ILC/SILC staff and board members engaged in systems advocacy activities.
    - **Evaluation Plan**
      - *Reporting/Evaluation:*
        - Wisconsin SILC will receive quarterly reports on this indicator.
      - *Data Sources:*
        - Attendance records from WILN Advocacy Committee meetings.
      - *Data Points:*
        - Number of WILN members participating in WILN Advocacy Committee meetings.
      - *Goal Leads:*
        - WCILC, ILCs, ILCW

- **Indicator 3.4:** Number of consumers that identify advocacy goals in Independent Living Plans (ILPs).
  - **Evaluation Plan**
    - *Reporting/Evaluation:*
      - Wisconsin SILC will receive quarterly reports on this indicator.
    - *Data Sources:*
      - Statewide consistent data collection by using the same Management Information System (MIS) Data Points.
    - *Data Points:*
      - Number of open and closed consumers that have advocacy goals identified in Independent Living Plans (ILPs).
    - *Goal Leads:*
      - WCILC, ILCs
- **Goal 4:** Strengthen coordination of WILN over the next three years.
  - **Objective 4.1:** Develop and implement an IL Network three-year collaboration plan that includes partnership, when appropriate, partnership with the Designated State Entity (DSE) that has measurable outcomes.
    - **Indicator 4.1:** A retreat of WILN, where partners will outline roles and responsibilities, and determine how to effectively work cohesively together.
    - **Indicator 4.2:** Frequency of contacts between Wisconsin SILC members and the respective ILCs that serve the county in which they reside.
    - **Indicator 4.3:** Number of trainings offered to members of the IL Network related to onboarding of new Council Members and continuous training of IL Network partners.

- **Evaluation Plan**

- *Reporting/Evaluation:*

- Annual report on collaborative activities of the IL Network and DSE partner.
    - Individual Wisconsin SILC Member Training Plans, updated annually

- *Data Sources:*

- Wisconsin SILC quarterly program report
    - Wisconsin SILC Program Performance Report
    - Reports from Wisconsin SILC members about contacts with ILCs

- Pre- and Post- training surveys

- *Data Points:*

- ILCs attendance at Wisconsin SILC Quarterly and Executive Committee meetings
    - Wisconsin SILC member contacts with ILCs (e.g. phone calls, e-mails, in-person visits)
    - Training survey results

- *Goal Lead:*

- Wisconsin SILC

Wisconsin SILC conducted a needs assessment to evaluate the needs and satisfaction of people with disabilities who received IL services. The Wisconsin SILC analyzed Program Performance Report data from the ILCs for the previous three years, ILC consumer satisfaction survey data, and consumer barriers survey. In addition, the Wisconsin SILC had two pre-SPIL development public hearings. The information gleaned from the data analysis and public hearings was used to develop the SPIL for 2021-2023.

During year one of the SPIL, Wisconsin SILC, will work to create and develop a survey to gather information for a statewide needs assessment to gather input from stakeholder groups (e.g. people with disabilities, ILCs, consumer councils, and other disability groups) to better understand their needs and opportunities for addressing these needs with IL services. In addition, the Wisconsin SILC will continue to analyze ILC consumer satisfaction survey and consumer barrier survey data on an annual basis.

Wisconsin SILC also provides an opportunity for people to provide feedback on the SPIL, IL services, and barriers experienced at every public meeting of the SILC. In addition, it is important the Wisconsin SILC ensure the needs of the ILCs are being met so WILN can serve more people with disabilities statewide. During the SPIL three-year period, the Wisconsin SILC will send a survey to ILC directors to see if they have enough funding and resources, have unmet needs, or other concerns that WILN can work on collaboratively to better assist the ILCs with meeting the needs of people with disabilities.

## 1.5 Financial Plan

Sources, uses of, and efforts to coordinate funding to be used to accomplish the Goals and Objectives. Process for grants/contracts, selection of grantees, and distribution of funds to facilitate effective operations and provision of services.

<b>Fiscal Year(s): 2021</b>						
<b>Sources</b>	<b>Projected Funding Amounts and Uses</b>					
	SILC Resource Plan	IL Services*	General CIL Operations	CARES Act Funds**	Other SPIL Activities	Retained by DSE for Administrative costs (applies only to Part B funding)
<b>Title VII Funds</b>						
Chapter 1, Part B (including state match)	\$101,783	\$241,283			\$65,000	
Chapter 1, Part C			\$1,146,900	\$1,256,031		
<b>Other Federal Funds</b>						
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$60,000					
Social Security Reimbursement			\$600,000			
Other						
<b>Non-Federal Funds</b>						
State Funds			\$983,500			
Other						

\* ILCs will receive \$68,787 in Part B FFY 2020 carryover funds from SILC underspending for IL Services.

\*\* CARES Act funds are based on reports from ILCs on funding received. .

<b>Fiscal Year(s): 2022-2023</b>					
<b>Sources</b>	<b>Projected Funding Amounts and Uses</b>				
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Administrative costs (applies only to Part B funding)
<b>Title VII Funds</b>					
Chapter 1, Part B (including state match)	\$101,783	\$171,934		\$65,000	
Expanding the Public Health Workforce within the Disability Network: IL Part B			\$121,081		
Chapter 1, Part C			\$1,146,900		
<b>Other Federal Funds</b>					
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$60,000				
Social Security Reimbursement			\$600,000		
Other					
<b>Non-Federal Funds</b>					
State Funds			\$983,500		
Other					

<b>Fiscal Year(s): 2024</b>					
<b>Sources</b>	<b>Projected Funding Amounts and Uses</b>				
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Administrative costs (applies only to Part B funding)
<b>Title VII Funds</b>					
Chapter 1, Part B (including state match)	\$101,783	\$171,934		\$65,000	
Chapter 1, Part C			\$1,146,900		
<b>Other Federal Funds</b>					
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$60,000				
Social Security Reimbursement			\$600,000		
Other					
<b>Non-Federal Funds</b>					
State Funds			\$983,500		
Other					

\$34,200 is provided in state general purpose revenue is associated with state match. The DSE does not retain any federal Part B funds and staff positions are 100% funded with state general purpose revenue. When DSE staff are utilized to provide administrative support to the Wisconsin SILC, DSE staff time is tracked and utilized as in-kind match as needed for new or additional federal funds which require a state match.



### **SILC Resource Plan**

The SILC Resource Plan totals \$161,783 on an annual basis, for a total of \$485,349 for the three-year SPIL period. This funding will be allocated to the Wisconsin SILC to support its operations, meet SILC assurances, evaluate the SPIL, and achieve SPIL goals.

The Wisconsin SILC released \$68,787 in Part B Federal Fiscal Year (FFY) 2020 underspending to the Independent Living Centers for IL Services, which will be reflected in the FY 2021 PPR. The SILC had underspending due to the COVID-19 pandemic, which resulted in reduced costs for the Wisconsin SILC due to no longer having face-to-face meetings, a significant reduction in travel expenses, and fewer costs associated with accommodations. In addition, the SILC staff resigned in February 2020 and the SILC did not hire a new staff person in FFY 2020 which resulted in cost savings.

### **Other SPIL Activities**

WCILC is allocated \$65,000 on annual basis, for a total of \$195,000 for the three-year SPIL period for reporting on WILN SPIL goals and related objectives and indicators (See Evaluation Section 1.4 of the SPIL). These goals include:

- **Goal 1:** Wisconsin's eight ILCs will maintain their current number of individuals with disabilities who receive Independent Living (IL) core services on an annual basis.
- **Goal 2:** All of Wisconsin's eight ILCs will provide IL core services of the highest quality on an annual basis.
- **Goal 3:** Wisconsin IL Network actively engages in disability systems advocacy at the state and national levels on an annual basis.

### **IL Services, General CIL Operations, and CARES Act Funds**

The IL Services and General CIL Operations is allocated amongst Wisconsin's eight ILCs. ILCs receive Part C funds and CARES Act funds directly. The Designated State Entity (DSE) allocates Part B, Independent Living state general purpose revenue, and Social Security Reimbursement funds to the ILCs based on Section 3.1 of the SPIL (see Table 1: Funding Allocations). Table 1 also reflects the Part B carryover funds from FFY 2020 allocated from the SILC to the ILCs for IL Services in FFY 2021.

**Table 1: Funding Allocation (FFY 2021)**

<b>Agency</b>	<b>Funding Source/Program: Part B (amount includes federal &amp; state match)</b>	<b>Funding Source/Program: Part B (Carryover funds from FFY 2020 - amount includes federal &amp; state match)</b>	<b>Funding Source/Program: State IL GPR</b>	<b>Funding Source/Program: Social Security Reimbursement</b>	<b>Funding Source/Program: I&amp;E</b>	<b>TOTAL Award (all funding sources)</b>
Access to Independence	\$21,562	\$9,458.25	\$44,395	\$27,085		\$102,500.25
Society's Assets	\$21,562	\$9,458.25	\$182,682	\$111,448		\$325,150.25
Independence First	\$21,562	\$9,458.25	\$19,483	\$11,887		\$62,390.25
North Country Independent Living DBA indiGo	\$21,562	\$9,458.25	\$182,682	\$111,448		\$325,150.25
CILWW	\$21,562	\$9,458.25	\$6,212	\$3,788		\$41,020.25
ILR	\$21,562	\$9,458.25	\$182,682	\$111,448		\$325,150.25
Options	\$21,562	\$9,458.25	\$182,682	\$111,448		\$325,150.25
Mid-State	\$21,562	\$9,458.25	\$182,682	\$111,448		\$325,150.25
WCILC	\$65,000					\$65,000
Wisconsin SILC	\$101,783				\$60,000	\$161,783
<b>TOTAL</b>	\$339,279	\$75,666	\$983,500	\$600,000	\$60,000	\$2,058,445

**Table 2: Funding Allocation (FFY 2022-2023)**

<b>Agency</b>	<b>Funding Source/Program: Part B (amount includes federal &amp; state match)</b>	<b>Funding Source/Program: State IL GPR</b>	<b>Funding Source/Program: Social Security Reimbursement</b>	<b>Funding Source/Program: Public Health Workforce IL Part B</b>	<b>Funding Source/Program: I&amp;E</b>	<b>TOTAL Award (all funding sources)</b>
Access to Independence	\$21,491.75	\$44,395	\$27,085	\$15,136		\$108,107.75
Society's Assets	\$21,491.75	\$182,682	\$111,448	\$15,135		\$330,756.75
Independence First	\$21,491.75	\$19,483	\$11,887	\$15,135		\$67,996.75
North Country Independent Living DBA indiGO	\$21,491.75	\$182,682	\$111,448	\$15,135		\$330,756.75
CILWW	\$21,491.75	\$6,212	\$3,788	\$15,135		\$31,491.75
ILR	\$21,491.75	\$182,682	\$111,448	\$15,135		\$330,756.75
Options	\$21,491.75	\$182,682	\$111,448	\$15,135		\$330,756.75
Mid-State	\$21,491.75	\$182,682	\$111,448	\$15,135		\$330,756.75
WCILC	\$65,000					\$65,000
Wisconsin SILC	\$101,783				\$60,000	\$161,783
<b>TOTAL</b>	\$338,717	\$983,500	\$600,000	\$121,081	\$60,000	\$2,103,298

**Table 3: Funding Allocation (FFY 2024)**

<b>Agency</b>	<b>Funding Source/Program: Part B (amount includes federal &amp; state match)</b>	<b>Funding Source/Program: State IL GPR</b>	<b>Funding Source/Program: Social Security Reimbursement</b>	<b>Funding Source/Program: I&amp;E</b>	<b>TOTAL Award (all funding sources)</b>
Access to Independence	\$21,491.75	\$44,395	\$27,085		\$92,971.75
Society's Assets	\$21,491.75	\$182,682	\$111,448		\$315,621.75
Independence First	\$21,491.75	\$19,483	\$11,887		\$52,861.75
North Country Independent Living DBA indiGO	\$21,491.75	\$182,682	\$111,448		\$315,621.75
CILWW	\$21,491.75	\$6,212	\$3,788		\$31,491.75
ILR	\$21,491.75	\$182,682	\$111,448		\$315,621.75
Options	\$21,491.75	\$182,682	\$111,448		\$315,621.75
Mid-State	\$21,491.75	\$182,682	\$111,448		\$315,621.75
WCILC	\$65,000				\$65,000
Wisconsin SILC	\$101,783			\$60,000	\$161,783
<b>TOTAL</b>	<b>\$338,717</b>	<b>\$983,500</b>	<b>\$600,000</b>	<b>\$60,000</b>	<b>\$1,982,217</b>

Centers for Independent Living (CILs) have received \$85 million in COVID-19 Aid, Relief, and Economic Security Act (CARES Act) supplemental funding. Wisconsin ILCs will be receiving \$1,256,030 in CARES Act funds, based on most recent information available as of April 2020. The CARES Act funds Wisconsin receives will be used for IL services that assist people with disabilities to remain safe, connected and independent in their communities, along with covering expenses related to COVID including IT/Technology, staff salaries, wages and leave, and COVID related supplies.

The amount of CARES Act funding each ILC will receive as well as each ILCs service area (See Table 2: CARES Act Funds by ILC).

**Table 3: CARES Act Funds by ILC**

<b>Independent Living Center</b>	<b>Counties Served</b>	<b>CARES Act Funds</b>
Access to Independence	Columbia, Dane, Dodge, Green	\$ 311,227
Center for Independent Living for Western Wisconsin	Polk, Barron, Rusk, St. Croix, Dunn, Chippewa, Pierce, Pippin, Eau Claire, Clark	\$ 452,451
Independence First	Milwaukee, Washington, Waukesha, Ozaukee	\$340,669
Independent Living Resources	Crawford, Richland, Sauk, Iowa, Grant, Lafayette, Vernon, La Crosse, Monroe, Jackson, Trempealeau, Buffalo, Juneau	\$30,337
Midstate Independent Living Choices	Adams, Florence, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, Taylor, Vilas, Wood	\$30,337
North Country Independent Living DBA indiGO	Douglas, Bayfield, Ashland, Iron, Price, Sawyer, Washburn, Burnett	\$30,336
Options for Independent Living	Door, Kewaunee, Manitowoc, Brown, Sheboygan, Fond du Lac, Calumet, Green Lake, Marquette, Winnebago, Waupaca, Waushara, Outagamie, Shawano, Menominee, Marinette, Oconto	\$30,337
Society's Assets Incorporated	Jefferson, Kenosha, Racine, Rock, Walworth	\$30,337

In recent years, there have been decreases in CIL Operating Funds and one-time increases which have threatened the ability of some ILCs to maintain their current level of IL services. WILN values the importance of input from the ILCs and the Wisconsin SILC in making decisions regarding funding at both state and federal levels. WILN also recognizes the importance of implementing the Network's long-standing policy regarding funding equity within the ILCs.

Note, the term "base funds" refers to funds appropriated under federal and state law to provide general support for the operation of Centers for Independent Living and to provide independent living services when those funds are generally expected to be available from year-to-year. WILN includes in base funds, those authorized under the Rehabilitation Act of 1973, as amended, Title VII, Chapter 1, subchapter C and Social Security Reimbursement funds, and under Wisconsin Statute 46.96(2).

A strong network serves to increase access to services for people with disabilities. Adherence to the funding equity policy keeps the network strong. The fundamental aspect of our funding equity policy is that all ILCs go up or down together. Equity in funding increases or decreases in a given year occurs when the difference between base funds for that year and for the prior year are essentially equal for each ILC.

Other aspects of the funding equity policy restrict new funds being used to create a new Center when that may endanger funding to the existing Network and/or funding is not sustainable to support the ongoing functioning of a new Center on a year-to-year basis indefinitely. No new Center shall be created until all existing eight ILCs in the Network achieve the base funding target of \$626,400 per ILC.

WILN will prioritize new (non-one-time funding) based on the following three priorities, in order, for when new funds (beyond the cost-of-living increase) are available:

- 1. Maintain the ability of each ILC in the existing Network to serve its consumers at 2008 funding levels (levels received for the performance period from October 2007 through September 2008).** Federal Fiscal Year 2008 was the chosen baseline because at the time it was the high-water mark for all of the ILCs, including the five that were now receiving federal funds, and had increases or steady funding from one year to the next, and all of the ILCs had achieved our previous base funding target of \$300,000.
- 2. Support existing ILCs and achieve \$626,400 base funding target per ILC;** and
- 3. Provide additional resources to support IL services in the most underserved service area** using the methodology determined by the WILN during the next three years.

**Funding Priorities Note:** The methodology employed to adhere to the principle of Priority 1 and 2 above since 2003 has been to use the non-federal base funds appropriations to provide centers with a proportionate increase in that year that is as equitable across the Network as is practicable. All ILCs in the Network receive base fund contracts described earlier. Historically, however, some centers in the network established at an earlier time (1979-80) receive a much larger Subchapter C award than ILCs formed later, funded primarily by Wisconsin state statute 46.96. With the full support of the entire Network including the DSE that also serves as the

administrator of the state funds, those Centers founded later receive a larger state base funding contract relative to those centers which hold a larger Subchapter C award. Therefore, when the Network is in receipt of a letter from the Administrator that new federal funds are available in any given year and asking how WILN wishes to distribute those funds in line with the current approved SPIL, the process described above that is used. The state contracts are modified in an attempt to level out the impact of the increases so as not to exacerbate the historical imbalance in base funds available for all Centers to carry out the requirements of an ILC contained in state and federal statutes.

The DSE issues funds to the ILCs, WCILC, and Wisconsin SILC as outlined in the State Plan for Independent Living (SPIL) Financial Plan and follows Wisconsin Department of Health Services (DHS) grant award processes. The DSE allocates I&E, Part B funds, and Part B match funds on a federal fiscal year basis (October 1 – September 30). The DSE allocates the Social Security Reimbursement and state general purpose revenue on a state fiscal year basis (July 1 – June 30).

Prior to receiving these funds and issuance of contracts, the DSE develops a scope of work based on the work activities and goals outlined in the SPIL or in relation to federal and state statutes and intended funding purposes. These scopes of work are reviewed and approved by the IL Network and DHS fiscal and contract staff.

The DSE then issues grant continuation packets to be completed by the Wisconsin SILC, WCILC, and ILCs. The grant continuation packets are issued 60 days prior to the start of the fiscal year. The grant continuation packets include a budget form to be completed, scope of work, and quarterly program and budget reports. The grant packets are due to the DSE 30 days prior to the start of the fiscal year. Proposed budgets are reviewed and approved by the DSE and Wisconsin Division of Vocational Rehabilitation (DVR). Grant funds are available at the start of the fiscal year and are available to draw upon on a monthly basis.

The ILCs submit a Part B program and budget reports on a quarterly basis. The Wisconsin SILC and WCILC submit SPIL progress reports and budgets on a quarterly basis. The ILCs and Wisconsin SILC submit copies of their annual Program Performance Reports to the DSE and DVR. The ILCs, WCILC, and Wisconsin SILC submit copies of their annual financial audits to the DSE. In addition, one ILC per year goes through the QUILS Peer Review and recommendations from this reviews are shared with the Wisconsin SILC and DSE.

The ILCs receive Part C funds and CARES Act funds directly from the federal government. ACL provides oversight for these funds.

## Section 2: Scope, Extent, and Arrangements of Services

### 2.1 Services

**Services to be provided to persons with disabilities that promote full access to community life including geographic scope, determination of eligibility and statewideness.**

IL services are provided in all 72 counties of Wisconsin to people with disabilities, there is no additional eligibility determination other than an individual's self-identification as a person with a disability. For some of the optional services below, people with disabilities may need to be enrolled in specific programs to receive services such as being a consumer of Division of Vocational Rehabilitation or enrolled in IRIS self-directed program. ILCs receive additional contracts and grants beyond the purview of the SPIL to provide optional services, therefore services may vary by county.

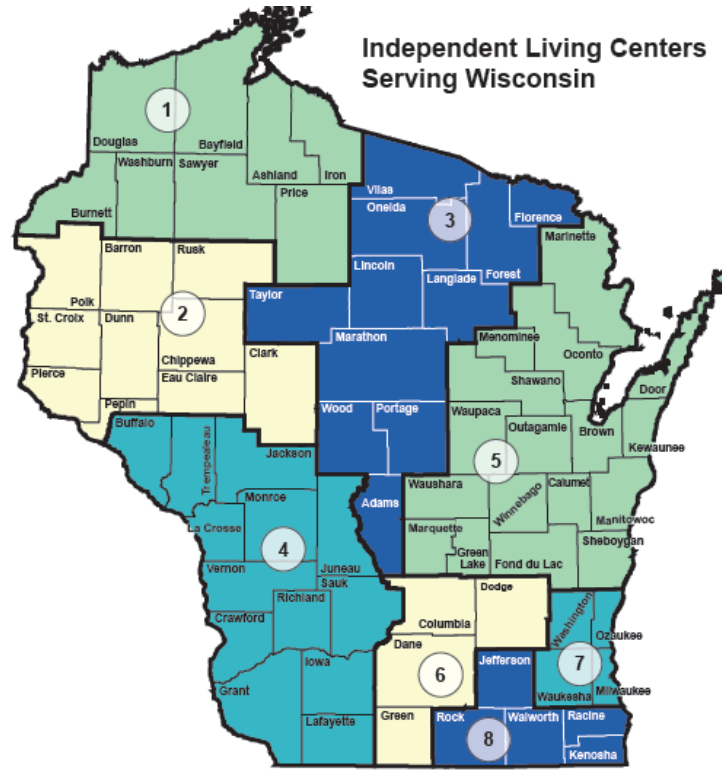
<b>Table 2.1A: Independent living services</b>	<b>Provided using Part B</b> (check to indicate yes)	<b>Provided using other funds</b> (check to indicate yes; do not list the other funds)	<b>Entity that provides</b> (specify CIL, DSE, or the other entity)
Core Independent Living Services, as follows: <ul style="list-style-type: none"> <li>- Information and referral</li> <li>- IL skills training</li> <li>- Peer counseling</li> <li>- Individual and systems advocacy</li> <li>- Transition services including:               <ul style="list-style-type: none"> <li>▪ Transition from nursing homes &amp; other institutions</li> <li>▪ Diversion from institutions</li> <li>▪ Transition of youth (who were eligible for an IEP) to post-secondary life</li> </ul> </li> </ul>			
	X	X	CIL
	X	X	CIL
	X	X	CIL
	X	X	CIL
Counseling services, including psychological, psychotherapeutic, and related services			



<b>Table 2.1A: Independent living services (continued-1)</b>	<b>Provided using Part B (check to indicate yes)</b>	<b>Provided using other funds (check to indicate yes; do not list the other funds)</b>	<b>Entity that provides (specify CIL, DSE, or the other entity)</b>
Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with disabilities) Note: CILs are not allowed to own or operate housing.		X	CIL
Rehabilitation technology		X	CIL
Mobility training		X	CIL
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services		X	CIL
Personal assistance services, including attendant care and the training of personnel providing such services		X	CIL
Surveys, directories, and other activities to identify appropriate housing, recreation opportunities, and accessible transportation, and other support services		X	CIL
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act		X	CIL
Education and training necessary for living in the community and participating in community activities		X	CIL
Supported living			
Transportation, including referral and assistance for such transportation		X	CIL
Physical rehabilitation			
Therapeutic treatment			
Provision of needed prostheses and other appliances and devices			

<b>Table 2.1A: Independent living services (continued-2)</b>	<b>Provided using Part B (check to indicate yes)</b>	<b>Provided using other funds (check to indicate yes; do not list the other funds)</b>	<b>Entity that provides (specify CIL, DSE, or the other entity)</b>
Individual and group social and recreational services		X	CIL
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options		X	CIL
Services for children		X	CIL
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance, of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with disabilities		X	CIL
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future		X	CIL
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities		X	CIL
Such other services as may be necessary and not inconsistent with the Act		X	CIL

Wisconsin's eight Independent Living Centers (ILCs) provide Independent Living core services in all 72 counties of the state.



**1. North Country Independent Living DBA indiGO**

**Counties Served:** Ashland, Bayfield, Burnett, Douglas, Iron, Price, Sawyer, Washburn

**2. Center for Independent Living for Western Wisconsin**

**Counties Served:** Barron, Chippewa, Clark, Dunn, Eau Claire, Pepin, Pierce, Polk, Rusk, St. Croix

**3. Midstate Independent Living Choices**

**Counties Served:** Adams, Florence, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, Taylor, Vilas, Wood

**4. Independent Living Resources**

**Counties Served:** Buffalo, Crawford, Grant, Iowa, Jackson, Juneau, La Crosse,

Lafayette, Monroe, Richland, Sauk, Trempealeau, Vernon

**5. Options for Independent Living**

**Counties Served:** Brown, Calumet, Door, Fond du Lac, Green Lake, Kewaunee, Manitowoc, Marinette, Marquette, Menominee, Oconto, Outagamie, Shawano, Sheboygan, Waupaca, Waushara, Winnebago

**6. Access to Independence**

**Counties Served:** Columbia, Dane, Dodge, Green

**7. Independence First**

**Counties Served:** Milwaukee, Ozaukee, Washington, Waukesha

**8. Society's Assets**

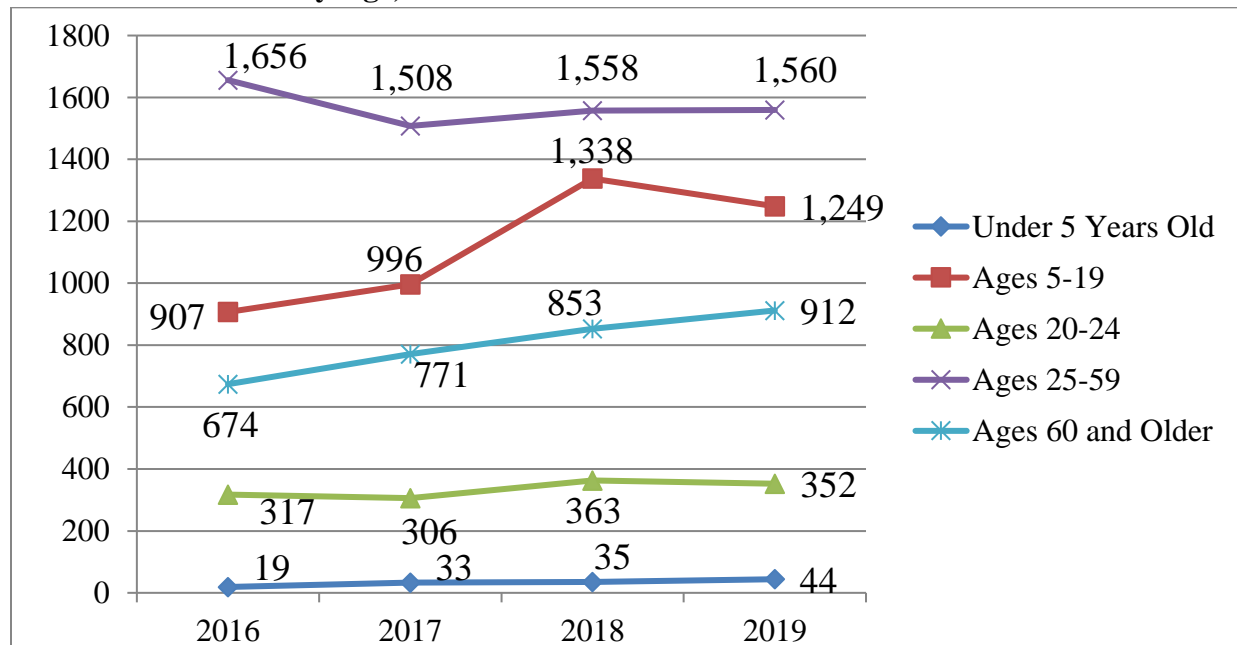
**Counties Served:** Jefferson, Kenosha, Racine, Rock, Walworth

## 2.2 Outreach

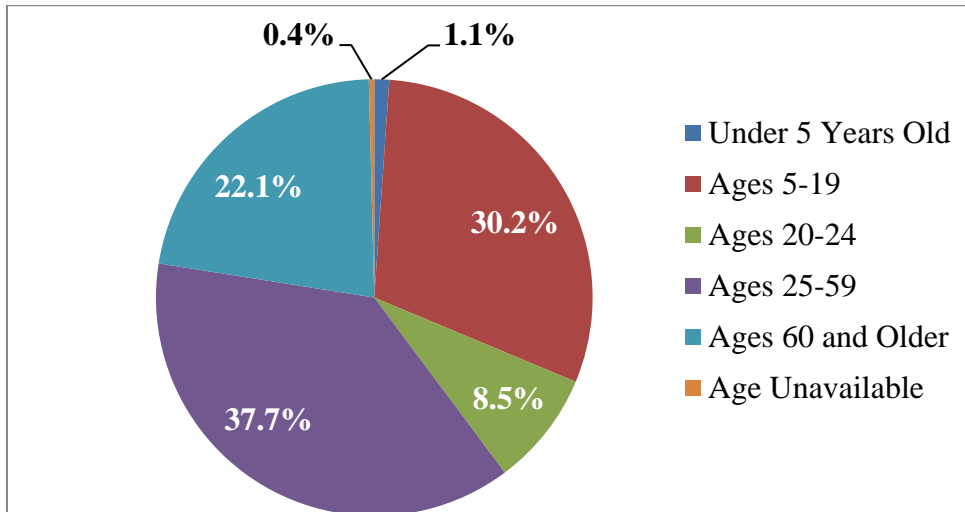
**Definition of Undeserved and Underserved: How services will be made available to populations that are unserved/underserved by subchapter B and subchapter C (including minority groups and urban and rural populations) and how outreach will be conducted.**

The Wisconsin State Independent Living Council (SILC), Independent Living Centers (ILCs), Wisconsin Coalition of Independent Living Centers (WCILC), and Designated State Entity (DSE) have thoroughly analyzed the service data from Program Performance Reports for four target population segments (age, race, disability type and geographic location) on annual basis (See Charts 1, 2, 3, and 4). In Wisconsin, “served” means a person with a disability has received Information and Referral (I&R) service and/or has a Consumer Information File (CIF). WILN finds that no part of the State or any target population segment is “unserved,” meaning in each county at least one I&R service and/or CIF has been provided in each of the eight ILCs’ service areas.

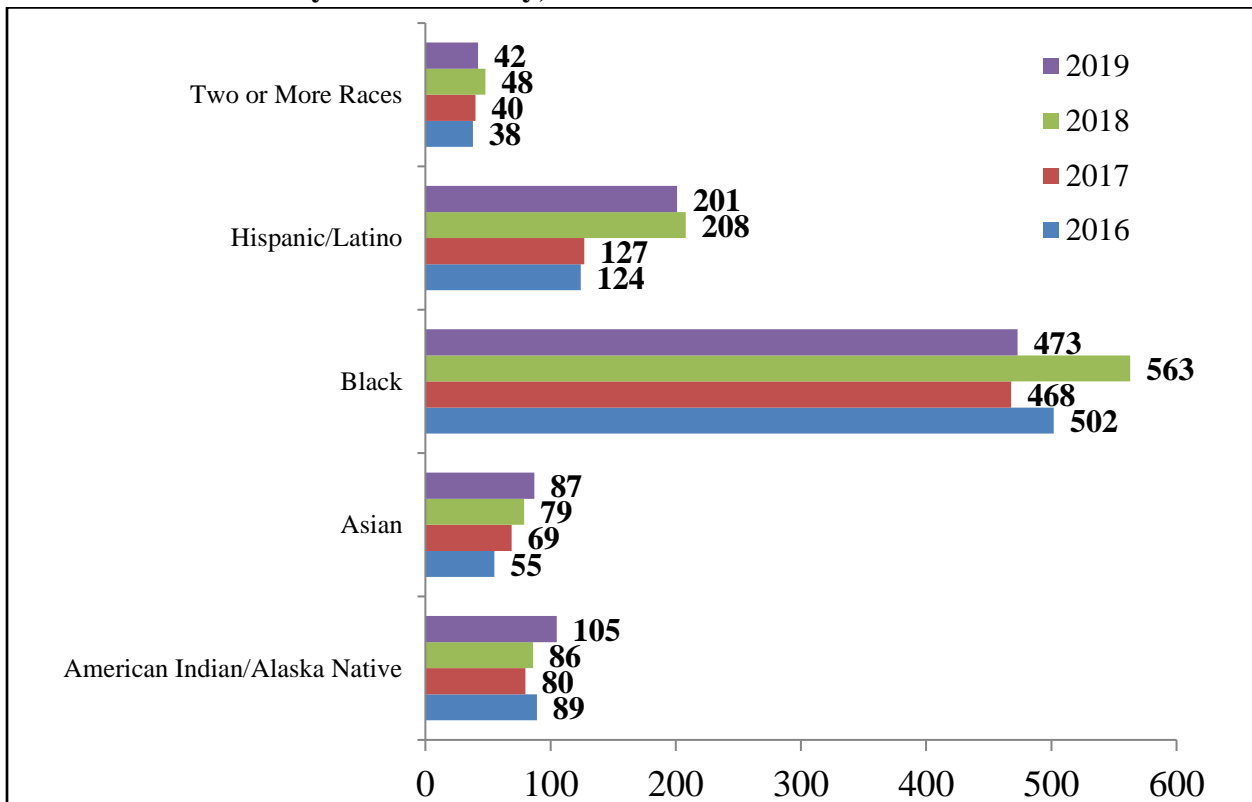
**Chart 1: Consumers by Age, 2016-2019**



**Chart 2: Consumers Served by Age, 2019**

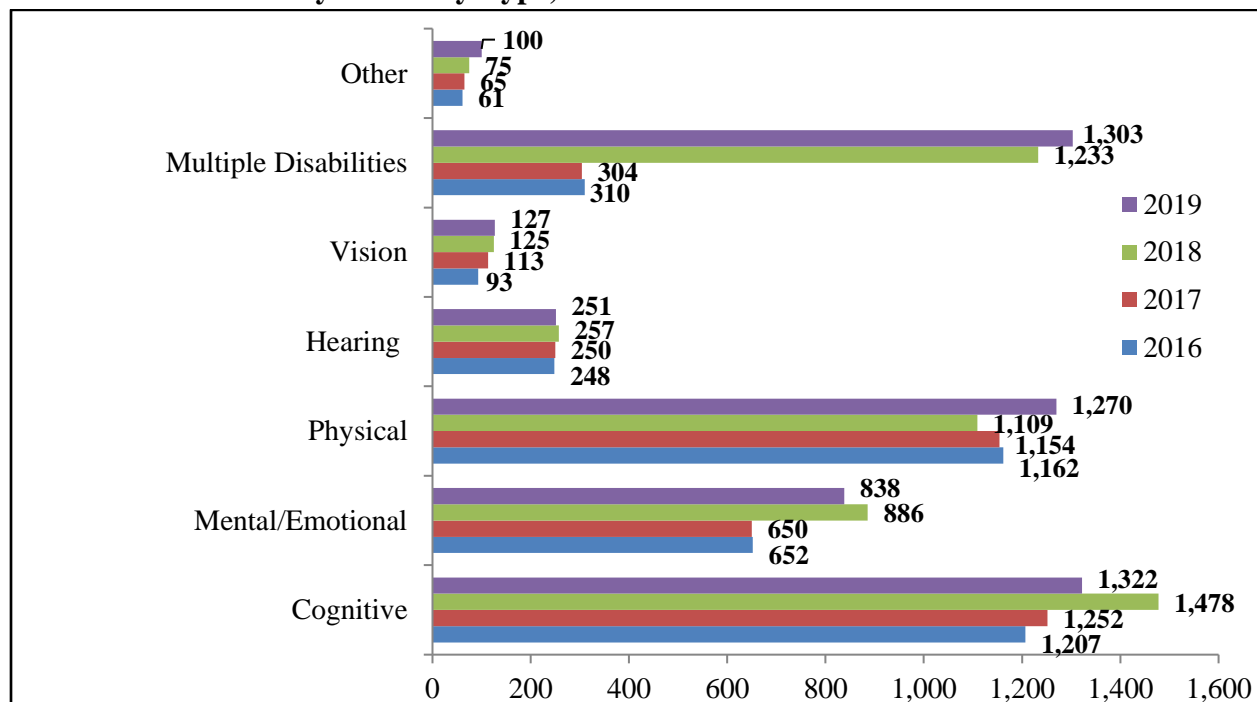


**Chart 3: Consumers by Race/Ethnicity, 2016-2019**



**Note:** Native Hawaiian or Other Pacific Islander was less than 10 people a year, left off chart as it skewed data on chart. White people were also listed on separate chart for this reason.

**Chart 4: Consumers by Disability Type, 2016-2019**



Yet consumers in virtually every part of the state and across all population segments are “underserved,” meaning we are not reaching the majority of people with disabilities. With the current resources ILCs receive, the Network is able to provide IL services to 1% of the total number of people with disabilities in 54 of Wisconsin’s 72 counties. In addition, as noted in the charts, Wisconsin currently assess the following three population segment data sets (age, race/ethnicity, and type of disability) to determine “most underserved.” Wisconsin will be reviewing and revising the methodology to ascertain “most underserved” over the next three years of the new SPIL. WILN is also planning to use new data analysis to determine funding equity of the current eight ILCs’ service areas.

The ILCs report data to Wisconsin SILC annually to calculate any underserved populations. Wisconsin SILC compiles this data to identify underserved trends. As previously stated, over the next three years, Wisconsin will review, and potentially revise, its methodology to determine the “most underserved” using these four target populations (age, race/ethnicity, type of disability, geographic location).

WILN will consider and implement the following statewide outreach strategies once the new methodology has been determined:

- Make brochures and other information in English, alternate formats and high-concentration foreign languages such as Spanish and Hmong to consumers directly and through county officials, disability organizations, refugee assistance organizations, and other local contacts in underserved counties or areas with other underserved groups.

- Communicate and provide culturally appropriate services for underserved groups.
- Update outreach plans to take advantage of new communication technologies.
- Advertise in media serving communities identified as most underserved.
- Work with community organizations serving the most underserved populations.
- Open and support an office in an underserved county to coordinate work with consumers and others in that area.
- Recruit Board and staff members from underserved populations.

## **2.3 Coordination**

### **Plans for coordination of services and cooperation among programs and organizations that support community life for persons with disabilities.**

Wisconsin SILC meets quarterly and additionally as needed, to maximize the cooperation and coordination of roles and responsibilities with respect to IL programs and services. The DSE has appointed a representative who attends quarterly Wisconsin SILC meetings. The representative or another member of DSE staff updates the Wisconsin SILC on DSE services as a regular agenda item at the quarterly meetings. An ILC Executive Director is elected by the ILCs and appointed by the Governor to serve as the IL representative. The IL representative reports on the operations and activities of WCILC and the ILCs at the Wisconsin SILC's quarterly meetings.

Wisconsin SILC, WCILC, and ILCs coordinate trainings, when feasible, on trainings that may be useful and beneficial to members or staff of more than one entity within the Network. WCILC, Wisconsin SILC, and DSE staff meet periodically, as needed, to exchange information about implementation of the SPIL and promote cooperation and coordination of their roles with respect to the IL services. Progress on the SPIL is also discussed with the full Wisconsin SILC by all three entities at the quarterly meetings and SPIL Committee meetings.

WILN maintains contact and/or receives updates with several disability councils and other organizations to solicit input for development, implementing, monitoring, and evaluation of the SPIL. These include the following:

- Wisconsin Rehabilitation Council – Wisconsin SILC representative participates and attends quarterly meetings.
- Statewide Assistive Technology Advisory Council – ILC representative participates and attends quarterly meetings.
- Governor's Committee for People with Disabilities (GCPD) – WCILC staff is appointed to the Committee and attends quarterly meetings.
  - GCPD includes representatives from the following Governor or Secretary appointed Councils:
    - Wisconsin Board for People with Developmental Disabilities (BPDD)

- Wisconsin Council on Physical Disabilities
  - Wisconsin Council on Mental Health
  - Wisconsin State Council on Alcohol & Other Drug Abuse
  - Wisconsin Statutory Council on Blindness
  - Wisconsin Council for the Deaf and Hard of Hearing
- Survival Coalition (Coalition of 30 plus disability organizations) – WCILC is a member and WCILC staff attends bi-weekly meetings.
  - National Council on Independent Living (NCIL) – WCILC staff is a Board Member, Region V Representative and attends meetings four times a year. WILN has several members who participate in various NCIL Committees, which usually meet monthly.
  - Association of Rural Programs for Independent Living (APRIL) – The majority of Wisconsin ILCs as APRIL members and WILN has a representative on the APRIL board.

WILN has a three-year Disability Systems Advocacy Plan that is developed based on consumer and stakeholder input. Members from WCILC, Wisconsin SILC, and ILCs all participate in the development of WILN’s Disability System Advocacy Plan. The plan has individual issue teams that meet monthly. These teams receive and provide input on the advocacy plan’s priority areas. The teams develop a unified voice/message around each issue. This unified voice is shared with other disability councils, committees, and policymakers. WILN representatives on the various disability committees provide input and receive information and then, in turn, impart that information back to the IL Network. This circular system of information in and out is effective in achieving a cohesive and informed IL Network in Wisconsin. This information is shared on a continual basis with staff, board, and consumers of the eight ILCs, WCILC, and the Wisconsin SILC. WILN addresses state and national issues and local and regional issues are addressed by the ILCs. WILN has representation on over forty-five state and national disability committees.

### **Section 3: Network of Centers**

#### **3.1 Existing Centers**

**Current Centers for Independent Living including: legal name; geographic area and counties served; and source(s) of funding. Oversight process, by source of funds (e.g., Part B, Part C, state funds, etc.) and oversight entity.**

**Table 4: Existing Centers**

<b>Independent Living Center</b>	<b>Geographic Area</b>	<b>Counties</b>	<b>Source(s) of Funding</b>
Access to Independence	Madison Metro Area	Columbia, Dane, Dodge, Green	Part B (including carryover funds), Part C, CARES Act Funds, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds, Public Health Workforce Grant



<b>Independent Living Center</b>	<b>Geographic Area</b>	<b>Counties</b>	<b>Source(s) of Funding</b>
Center for Independent Living for Western Wisconsin	West Central Wisconsin	Polk, Barron, Rusk, St. Croix, Dunn, Chippewa, Pierce, Pippin, Eau Claire, Clark	Part B (including carryover funds), Part C, CARES Act Funds, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds, Public Health Workforce Grant
Independence First	Milwaukee Metro Area	Milwaukee, Washington, Waukesha, Ozaukee	Part B (including carryover funds), Part C, CARES Act Funds, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds, Public Health Workforce Grant
Independent Living Resources	Southwestern Wisconsin	Crawford, Richland, Sauk, Iowa, Grant, Lafayette, Vernon, La Crosse, Monroe, Jackson, Trempealeau, Buffalo, Juneau	Part B (including carryover funds), Part C, CARES Act Funds, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds, Public Health Workforce Grant
Midstate Independent Living Choices	Central Wisconsin	Adams, Florence, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, Taylor, Vilas, Wood	Part B (including carryover funds), Part C, CARES Act Funds, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds
North Country Independent Living DBA indiGO	Northwest Wisconsin	Douglas, Bayfield, Ashland, Iron, Price, Sawyer, Washburn, Burnett	Part B (including carryover funds), Part C, CARES Act Funds, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds, Public Health Workforce Grant
Options for Independent Living	Northeast Wisconsin	Door, Kewaunee, Manitowoc, Brown, Sheboygan, Fond du Lac, Calumet, Green Lake, Marquette, Winnebago, Waupaca, Waushara, Outagamie, Shawano, Menominee, Marinette, Oconto	Part B (including carryover funds), Part C, CARES Act Funds, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds, Public Health Workforce Grant

<b>Independent Living Center</b>	<b>Geographic Area</b>	<b>Counties</b>	<b>Source(s) of Funding</b>
Society's Assets Incorporated	Southeast Wisconsin	Jefferson, Kenosha, Racine, Rock, Walworth	Part B (including carryover funds), Part C, CARES Act Funds, State Independent Living General Purpose Revenue, Social Security Reimbursement Funds, Public Health Workforce Grant

Table 5 provides information on each funding source and the related oversight process and entity. It does not list this information for each ILC, as all ILCs receive both federal and state IL funds in Wisconsin.

**Table 5: Oversight**

<b>Funding Source</b>	<b>Oversight Process</b>	<b>Oversight Entity</b>
Part B Federal/State Match	CIL submits PPR to DSE and Wisconsin SILC	DSE
Part B Federal/State Match	CIL submits quarterly program and budget reports	DSE
Part B Federal/State Match	CIL submits PPR to ACL	ACL
Independent Living state general purpose revenue	CIL submits PPR to DSE and Wisconsin SILC	DSE
Independent Living state general purpose revenue	CIL submits quarterly budget reports to DSE	DSE
Social Security Reimbursement Funds	CIL submits PPR to DSE, DVR, and Wisconsin SILC	DSE
Social Security Reimbursement Funds	CIL submits annual budget report to DSE and DVR	DSE
Part C Federal	CIL submits PPR to DSE	DSE
Part C Federal	CIL submits PPR to ACL	ACL
IL CARES Act Funds	CIL submits PPR to DSE	DSE
IL CARES Act Funds	CIL submits PPR to ACL	ACL

Part B, Independent Living General Purpose Revenue, Social Security Reimbursement Funds are overseen by the DSE. The DSE has a Memorandum of Understanding (MOU) with Division of Vocational Rehabilitation for Social Security Reimbursement funds which are pass-through dollars allocated to all eight of Wisconsin’s Independent Living Centers (ILCs).

ILCs receive two grant continuation packets one on a State Fiscal Year basis and one on a Federal Fiscal Year basis. ILCs complete the budget requests and submit to DSE. DSE reviews for allowable costs and approves budgets. Contracts are issued for these funds to each ILC. ILC completes lobbying certification and non-discrimination and conflict of interest documentation as part of their state contracts. ILCs submit copies of the annual Program Performance Reports to DSE, Wisconsin SILC, and ACL. In addition, ILCs report quarterly on program data and year-to-date budget spending by funding source. ILCs also submit their annual financial audits to the DSE.

Part C funds and CARES Act funds and related additional reporting are overseen ACL.

Centers for Independent Living (CILs) have received \$85 million in COVID-19 Aid, Relief, and Economic Security Act (CARES Act) supplemental funding. Wisconsin ILCs will be receiving \$1,256,031 in CARES Act funds, based on most recent information available as of April 2020.

The CARES Act funds Wisconsin receives will be used for IL services that assist people with disabilities to remain safe, connected and independent in their communities, along with covering expenses related to COVID including IT/Technology, staff salaries, wages and leave, and COVID related supplies.

The amount of CARES Act funding each ILC will receive as well as each ILCs service area (See Table 3: CARES Act Funds by ILC).

**Table 3: CARES Act Funds by ILC**

<b>Independent Living Center</b>	<b>Counties Served</b>	<b>CARES Act Funds</b>
Access to Independence	Columbia, Dane, Dodge, Green	\$ 311,227
Center for Independent Living for Western Wisconsin	Polk, Barron, Rusk, St. Croix, Dunn, Chippewa, Pierce, Pippin, Eau Claire, Clark	\$ 452,451
Independence First	Milwaukee, Washington, Waukesha, Ozaukee	\$340,669
Independent Living Resources	Crawford, Richland, Sauk, Iowa, Grant, Lafayette, Vernon, La Crosse, Monroe, Jackson, Trempealeau, Buffalo, Juneau	\$30,337
Midstate Independent Living Choices	Adams, Florence, Forest, Langlade, Lincoln, Marathon, Oneida, Portage, Taylor, Vilas, Wood	\$30,337
North Country Independent Living DBA indiGO	Douglas, Bayfield, Ashland, Iron, Price, Sawyer, Washburn, Burnett	\$30,336
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Society's Assets Incorporated	Jefferson, Kenosha, Racine, Rock, Walworth	\$30,337

The Centers for Independent Living (CILs) eligible to sign the SPIL, a minimum of 51% whom must sign prior to submission, are:

- Access to Independence
- Center for Independent Living for Western Wisconsin
- Independence First
- Independent Living Resources
- Midstate Independent Living Choices
- North Country Independent Living DBA indiGO
- Options for Independent Living
- Society's Assets, Incorporated

### **3.2 Expansion and Adjustment of Network**

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

#### ***Definition of Served, Unserved, and Underserved***

In Wisconsin, “served” means a person with a disability has received Information and Referral (I&R) service and/or has a Consumer Information File (CIF).

WILN finds that no part of the State or any target population segment is “unserved,” meaning in each county at least one I&R service and/or CIF has been provided in each of the eight ILCs’ service areas.

Yet consumers in virtually every part of the state and across all population segments are “underserved,” meaning we are not reaching the majority of people with disabilities. With the current resources ILCs receive, the Network is able to provide IL services to 1% of the total number of people with disabilities in 54 of Wisconsin’s 72 counties. In addition, as noted in the charts, Wisconsin currently assess the following three population segment data sets (age, race/ethnicity, and type of disability) to determine “most underserved.” Wisconsin will be reviewing and revising the methodology to ascertain “most underserved” over the next three years of the new SPIL. WILN is also planning to use new data analysis to determine funding equity of the current eight ILCs’ service areas.

#### ***Minimum Funding Plan per Center***

By 1994, Wisconsin committed to provide IL services in every county and the State Legislature appropriated IL state general purpose revenues for this purpose. In 2002, Rehabilitation Services Administration made Title VII, Chapter 1, Part C funds available pursuant to the SPIL to serve all areas and populations that had been unserved by a federally-funded ILCs at the time.

These funds and additional funds appropriated since then have never been sufficient to serve every person with a disability who needs IL services, let alone others who could benefit from IL services in Wisconsin. Thus, service information shows that the Network underserves virtually every county in the State at existing funding levels.

In recent years, there have been decreases in CIL Operating Funds and one-time increases which have threatened the ability of some ILCs to maintain their current level of IL services. WILN values the importance of input from the ILCs and the Wisconsin SILC in making decisions regarding funding at both state and federal levels. WILN also recognizes the importance of implementing the Network’s long-standing policy regarding funding equity amongst the ILCs.

Note, the term “base funds” refers to funds appropriated under federal and state law to provide general support for the operation of Centers for Independent Living and to provide independent living services when those funds are generally expected to be available from year-to-year. WILN includes in base funds, those authorized under the Rehabilitation Act of 1973, as amended, Title VII, Chapter 1, subchapter C and Social Security Reimbursement funds, and under Wisconsin State Statute 46.96(2).

A strong network serves to increase access to services for people with disabilities. Adherence to the funding equity policy keeps the network strong. The fundamental aspect of our funding equity policy is that all ILCs go up or down together. Equity in funding increases or decreases in a given year occurs when the difference between base funds for that year and for the prior year are essentially equal for each ILC.

Other aspects of the funding equity policy restrict new funds being used to create a new Center when that may endanger funding to the existing Network and/or funding is not sustainable to support the ongoing functioning of a new Center on a year-to-year basis indefinitely. No new Center shall be created until all existing eight ILCs in the Network achieve the base funding target of \$626,400 per ILC.

WILN will prioritize new (non-one-time funding) based on the following three priorities, in order, for when new funds are available:

- 1. Maintain the ability of each ILC in the existing Network to serve its consumers at 2008 funding levels (levels received for the performance period from October 2007 through September 2008).** Federal Fiscal Year 2008 was the chosen baseline because at the time it was the high-water mark for all of the ILCs, including the five that were now receiving federal funds, and had increases or steady funding from one year to the next, and all of the ILCs had achieved our previous base funding target of \$300,000.
- 2. Support existing ILCs and achieve \$626,400 base funding target per ILC;** and
- 3. Provide additional resources to support IL services in the most underserved service area** using the methodology determined by the WILN during the next three years.

**Funding Priorities Note:** The methodology employed to adhere to the principle of Priority 1 and 2 above since 2003 has been to use the non-federal base funds appropriations to provide centers with a proportionate increase in that year that is as equitable across the Network as is practicable. All ILCs in the Network receive base fund contracts described earlier. Historically, however, some centers in the network established at an earlier time (1979-80) receive a much larger Subchapter C award than ILCs formed later, funded primarily by Wisconsin state statute 46.96. With the full support of the entire Network including the DSE that also serves as the administrator of the state funds, those Centers founded later receive a larger state base funding contract relative to those centers which hold a larger Subchapter C award. Therefore, when the Network is in receipt of a letter from the Administrator that new federal funds are available in any given year and asking how WILN wishes to distribute those funds in line with the current

approved SPIL, the process described above that is used. The state contracts are modified in an attempt to level out the impact of the increases so as not to exacerbate the historical imbalance in base funds available for all Centers to carry out the requirements of an ILC contained in state and federal statutes.

The SILC Resource Plan totals \$161,783 on an annual basis, for a total of \$485,349 for the three-year SPIL period. This funding will be allocated to the Wisconsin SILC to support its operations, meet SILC assurances, evaluate the SPIL, and achieve SPIL goals.

WCILC is allocated \$65,000 on annual basis, for a total of \$195,000 for the three-year SPIL period for reporting on WILN SPIL goals.

All eight ILCs receive all IL funds both federal and state in Wisconsin for IL Services and General CIL Operations. ILCs receive Part C funds and CARES Act funds directly. The Designated State Entity (DSE) allocates Part B, Independent Living state general purpose revenue, and Social Security Reimbursement funds to the ILCs based on Section 3.1 of the SPIL (see Table 1: Funding Allocations).

**Table 2: Funding Allocations (FFY 2022-2023)**

<b>Agency</b>	<b>Funding Source/Program: Part B (amount includes federal &amp; state match)</b>	<b>Funding Source/Program: State IL GPR</b>	<b>Funding Source/Program: Social Security Reimbursement</b>	<b>Funding Source/Program: I&amp;E</b>	<b>TOTAL Award (all funding sources)</b>
Access to Independence	\$21,491.75	\$44,395	\$27,085		\$92,971.75
Society's Assets	\$21,491.75	\$182,682	\$111,448		\$315,621.75
Independence First	\$21,491.75	\$19,483	\$11,887		\$52,861.75
North Country Independent Living DBA indiGO	\$21,491.75	\$182,682	\$111,448		\$315,621.75
CILWW	\$21,491.75	\$6,212	\$3,788		\$31,491.75
ILR	\$21,491.75	\$182,682	\$111,448		\$315,621.75
Options	\$21,491.75	\$182,682	\$111,448		\$315,621.75
Mid-State	\$21,491.75	\$182,682	\$111,448		\$315,621.75
WCILC	\$65,000				\$65,000
Wisconsin SILC	\$101,783			\$60,000	\$161,783
<b>TOTAL</b>	\$338,717	\$983,500	\$600,000	\$60,000	\$1,982,217



### ***Increased or One-Time Funding***

WILN will use increased or one-time funding, that does not have a restricted purpose such as CARES Act funds, to serve underserved target populations and geographic areas in which these underserved populations reside (as identified in Section 2.2 of the SPIL).

### ***Increased and Non-One Time Funding (including Part B Carryover Funds)***

WILN will prioritize new (non-one-time funding) based on the following three priorities, in order, for when new funds are available:

**Maintain the ability of each ILC in the existing Network to serve its consumers at 2008 funding levels (levels received for the performance period from October 2007 through September 2008).** Federal Fiscal Year 2008 was the chosen baseline because at the time it was the high-water mark for all of the ILCs, including the five that were now receiving federal funds, and had increases or steady funding from one year to the next, and all of the ILCs had achieved our previous base funding target of \$300,000.

- 1. Support existing ILCs and achieve \$626,400 base funding target per ILC; and**
- 2. Provide additional resources to support IL services in the most underserved service area using the methodology determined by the WILN during the next three years.**

### ***Priorities for Establishment of a New CIL***

WILN's funding equity policy restricts new funds being used to create a new Center when that may endanger funding to the existing Network and/or funding is not sustainable to support the ongoing functioning of a new Center on a year-to-year basis indefinitely. No new Center shall be created until all existing eight ILCs in the Network achieve the base funding target of \$626,400 per ILC.

### ***Cuts or Reduced Funding***

In recent years, there have been decreases in CIL Operating Funds and one-time increases which have threatened the ability of some ILCs to maintain their current level of IL services. WILN values the importance of input from the ILCs and the Wisconsin SILC in making decisions regarding funding at both state and federal levels. WILN also recognizes the importance of implementing the Network's long-standing policy regarding funding equity within the ILCs.

Note, the term "base funds" refers to funds appropriated under federal and state law to provide general support for the operation of Centers for Independent Living and to provide independent living services when those funds are generally expected to be available from year-to-year. WILN includes in base funds, those authorized under the Rehabilitation Act of 1973, as amended, Title VII, Chapter 1, subchapter C and Social Security Reimbursement funds, and under Wisconsin Statute 46.96(2).

A strong network serves to increase access to services for people with disabilities. Adherence to the funding equity policy keeps the network strong. The fundamental aspect of our funding equity policy is that all ILCs go up or down together. Equity in funding increases or decreases in a given year occurs when the difference between base funds for that year and for the prior year are essentially equal for each ILC.

### ***Termination or Relinquishment of a Part C Award***

In the event that a CIL funded by Title VII Part C should close or their Part C grant is terminated for cause, the Independent Living Council of Wisconsin will request ACL to allow Wisconsin to retain the Part C funds for that service area, and the Independent Living Network would ask for a Request for Proposals for the service area to be served by a CIL as defined in Wisconsin State Statute 46.96(2).

### ***Building Capacity of Existing ILCs***

The current eight ILCs can expand their capacity to serve more people with disabilities as more funding becomes available, as deemed appropriate. ILCs can use these funds to establish more locations or to provide services in more efficient manners such as via distance telecommunication technology. The purpose of any method would be to more efficiently meet the needs of people with disabilities in underserved geographic regions.

### ***Independent Living Emergency Preparedness and Disaster Response Services***

All eight of the ILCs will provide inclusive emergency preparedness and disaster response services for people with disabilities and their families per the Wisconsin's statewide ILC Emergency Disaster Preparedness and Disaster Response Policy. This policy includes the following components:

1. ILCs will provide independent living services to individuals with disabilities who have been affected by a disaster or emergency who live within their designated service area and/or those who have evacuated into their service area.
2. If a Center finds itself in an area affected by a disaster or emergency, and requires the assistance of other ILCs, the Centers will collaborate to assist the Center in need. This assistance may include the reallocation of funds and the sharing of staffing and/or other resources. The ILCs involved will prepare and sign a Memorandum of Agreement (MOA). The MOA will provide a detailed description of the agreed terms of the shared funds, resources, timeframes, geographic areas, and roles and responsibilities of all parties involved.
3. The ILCs involved will work collaboratively with the Wisconsin Coalition of Independent Living Centers (WCILC), the Wisconsin SILC and the DSE. All requests and applicable information will be shared with the assigned Independent Living Administration Program Officer.
4. ILCs will be allowed to use applicable funds, as approved by the respective funder(s), to provide independent living services for individuals with disabilities and their families as part of an emergency preparedness and disaster response. These services may be provided for as long as the need exists, as determined by the ILCs involved in the provision of these services.

## **Section 4: Designated State Entity**

Wisconsin Department of Health Services, Division of Public Health, Bureau of Aging and Disability Resources will serve as the entity in Wisconsin designated to receive, administer, and account for funds made available to the state under Title VII, Chapter 1, Part B of the Act on behalf of the State. (*Sec. 704(c)*)

### **4.1 DSE Responsibilities**

- (1) receive, account for, and disburse funds received by the State under this chapter based on the plan;
- (2) 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;
- (3) keep such records and afford such access to such records as the Administrator finds to be necessary with respect to the programs;
- (4) submit such additional information or provide such assurances as the Administrator may require with respect to the programs; and
- (5) retain not more than 5 percent 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).

### **4.2 Grant Process & Distribution of Funds**

**Grant processes, policies, and procedures to be followed by the DSE in the awarding of grants of Part B funds.**

#### ***Continuation Funding***

The DSE issues funds to the ILCs, WCILC, and Wisconsin SILC as outlined in the State Plan for Independent Living (SPIL) Financial Plan and follows Wisconsin Department of Health Services (DHS) grant award processes. The DSE allocates I&E, Part B funds, and Part B match funds on a federal fiscal year basis (October 1 – September 30). The DSE allocates the Social Security Reimbursement and state general purpose revenue on a state fiscal year basis (July 1 – June 30).

Prior to receiving these funds and issuance of contracts, the DSE develops a scope of work based on the work activities and goals outlined in the SPIL or in relation to federal and state statutes and intended funding purposes. These scopes of work are reviewed and approved by the IL Network and DHS fiscal and contract staff.

The DSE then issues grant continuation packets to be completed by the Wisconsin SILC, WCILC, and ILCs. The grant continuation packets are issued 60 days prior to the start of the fiscal year. The grant continuation packets include a budget form to be completed, scope of work, and quarterly program and budget reports. The grant packets are due to the DSE 30 days prior to the start of the fiscal year. Proposed budgets are reviewed and approved by the DSE and

Wisconsin Division of Vocational Rehabilitation (DVR). Grant funds are available at the start of the fiscal year and are available to draw upon on a monthly basis.

The ILCs submit a Part B program and budget reports on a quarterly basis. The ILCs and Wisconsin SILC submit copies of their annual Program Performance Reports to the DSE and DVR. The ILCs, WCILC, and Wisconsin SILC submit copies of their annual financial audits to the DSE. In addition, one ILC per year goes through the QUILS Peer Review and recommendations from this review are shared with the Wisconsin SILC and DSE.

The ILCs receive Part C funds and CARES Act funds directly from the federal government. ACL provides oversight for these funds.

### ***New Awards***

When new federal or state awards are made which impact the SPIL Financial Plan and are specific to Part B, Part B state match, I&E, Social Security Reimbursement and state general purpose revenue the funds are distributed by the DSE as outlined in the approved and current State Plan for Independent Living. The DSE will amend existing fiscal year contracts to allocate these funds to the ILCs, WCILC, and Wisconsin SILC. If these additional funds require a change in scope of work, the DSE amends the scope of work. The revised scope of work is then reviewed and approved by the IL Network and DHS fiscal and contract staff.

A grant amendment packet is then issued to ILCs, WCILC, and Wisconsin SILC as soon as possible. Grantees are given 30 days to complete grant amendment packets. Proposed budgets are reviewed and approved by DSE and DVR. Contracts are issued 30-60 days after notification of award. Grant funds are added to existing contracts with new/additional grant funds and generally available 30-60 days after signed contracts are received. Grantees can draw upon these grant funds on a monthly basis.

The ILCs, WCILC, and Wisconsin SILC account for these new/additional funds through their existing program and budget reports on a quarterly basis. These funds are also be accounted for in ILCs, WCILC, and Wisconsin SILC financial audits submitted to the DSE on an annual basis.

Wisconsin SILC will request SPIL amendment or account for new/additional funding in Program Performance Report per guidance from ACL program officer.

### **4.3 Oversight Process for Part B Funds**

#### **The oversight process to be followed by the DSE.**

The ILCs submit a Part B program and budget reports on a quarterly basis. These reports are reviewed by the DSE and DVR. If there are questions or concerns related to the program or budget reports, DSE staff follows-up with the individual grantee. Reports are then finalized and

shared with DVR and Wisconsin SILC, as appropriate, and as outlined in SPIL or contracts on a quarterly or annual basis.

In addition, if a grantee needs to make a budget modification they can make that request at any time. The grantee needs to complete a new budget form along with an explanation as to why budget modification is being requested. The DSE and DVR then review and approve the budget modification requests. If a grantee will not be able to expend all funds, the DSE contacts the Wisconsin SILC and ILCs, if a reallocation or carryover request is needed, and inability to spend funds will impact SPIL Financial Table or activities.

The ILCs and Wisconsin SILC submit copies of their annual Program Performance Reports to the DSE and DVR. The ILCs, WCILC, and Wisconsin SILC submit copies of their annual financial audits to the DSE. In addition, one ILC per year goes through the QUILS Peer Review and recommendations from this review are shared with the Wisconsin SILC and DSE.

Throughout the fiscal year, DHS reviews grantee **fiscal and consumer reporting data** to ensure an ILC grantee is meeting **federal** compliance requirements. DHS conducts desk reviews and **on-site** visits to ensure ILCs operate consistently **and in accordance with** the Rehabilitation Act and **other** applicable regulations. In FFY 2022, the DSE resumed on-site compliance site visits utilizing ACL's COMP tool. The DSE will complete on-site compliance visits for all 8 ILCs by the close of FFY 2023. **Upon completion of all 8 ILC reviews** the DSE will **establish a compliance visit** schedule **ensuring an on-site visit for each ILC at least once** every three years.

If issues are identified through a desk review or on-site compliance visit, the DSE will notify the ILC and follow DHS' Independent Living Centers Compliance Reviews and Corrective Action Plan Process and Procedures. The DSE will also connect the ILC with WCILC for technical assistance on addressing any compliance issues identified.

#### **4.4 Administration and Staffing**

##### **Administrative and staffing support provided by the DSE.**

The DSE carries out its roles and responsibilities as outlined in the DSE assurances. The DSE does not retain any federal Part B funds and staff positions are 100% funded with state general purpose revenue.

DSE staff do not serve as staff to the Wisconsin SILC.

The DSE provides additional administrative support, as requested by the Wisconsin SILC, through a fully executed Memorandum of Agreement (MOA) between the Wisconsin SILC and

DSE, which outlines these specific administrative duties and addresses potential conflicts of interest.

#### **4.5 State Imposed Requirements**

**State-imposed requirements contained in the provisions of this SPIL including: (45 CFR 1329.17(g))**

**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**

Wisconsin SILC is established through an Executive Order from the Governor's office every time the administration changes. The Wisconsin SILC was reestablished through Executive Order 6 by Governor Tony Evers on January 24, 2019.

Wisconsin state statute (46.96 Independent Living Center Grants, Independent Living Services) applies directly to Independent Living Centers and state general purpose revenue funding. This state statute states that state general purpose revenue is for the provision of IL services and associated ILC operating expenses with providing these services. This state statute does not affect the provisions of this SPIL.

The DSE has two Memorandums of Understanding (MOUs) with DVR. One for \$60,000 of I&E funds which are pass-through funding to DHS to the Wisconsin SILC for the Resource Plan. The other MOU is for \$600,000 in Social Security Reimbursement funds which are pass-through funding to DHS to ILCs for IL services and related ILC operating expenses for providing these services. These are reviewed and signed on an annual basis.

The SILC needs to comply with open meeting laws for all in-person or teleconference meetings. The Department of Administration oversees this information and notifies the DSE if the SILC is not in compliance.

State contracts requires all ILCs and the SILC to have an annual financial audit. These reports are reviewed by the DSE and the DSE follows up with the ILCs or SILC if there are any findings or concerns. In addition, as outlined in Section 4.1 the DSE receives budget and program reports a quarterly basis and is able to monitor for compliance and financial concerns. In addition, the DSE receives copies of the ILCs and SILC's Program Performance Reports on an annual basis.

There are no additional rules or policies that limit, expands, or alters requirements for the SPIL or place additional restrictions on SILC autonomy, duties, responsibilities, and authorities.

#### **4.6 722 vs. 723 State**

**Check one:**

- 722 (if checked, will move to Section 5)  
 723 (if checked, will move to Section 4.7)

## **4.7 723 States**

**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.**

**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.**

Not applicable.

## **Section 5: Statewide Independent Living Council (SILC)**

### **5.1 Establishment of SILC**

**How the SILC is established and SILC autonomy is assured.**

#### ***Establishment***

The Wisconsin SILC is incorporated as the Independent Living Council of Wisconsin. Additionally, the Wisconsin SILC is established through Executive Order 6 issued by Governor Tony Evers on January 24, 2019.

#### ***Placement***

The Independent Living Council of Wisconsin is an independent non-profit organization. The Wisconsin SILC's organizational and financial operations are conducted from a central office located in Madison, Wisconsin.

#### ***Organizational Structure***

The Independent Living Council of Wisconsin is a 501(c)(3) non-profit organization.

#### ***Autonomy***

The Wisconsin SILC is allocated 30% in Part B funds (\$101,783) and I&E funds (\$60,000) for a total budget of \$161,783. The DSE issues a grant continuation packet on a federal fiscal year basis. The budget is developed by the Wisconsin SILC Treasurer and Wisconsin SILC staff. The budget is then distributed and reviewed by the entire Wisconsin SILC. After review and revision as applicable, the Wisconsin SILC will vote on the approval of the budget. At all Wisconsin SILC meetings the full SILC receives monthly financial statements, as well as a review of budget to actual expenditures.

The Wisconsin SILC maintains autonomy and control of its budget, the DSE provides fiscal oversight and monitoring. Annually, the Wisconsin SILC submits a budget to the DSE for approval to ensure fiscal oversight and accountability. Any input or suggestions from the DSE are only to assist in Wisconsin SILC's compliance with state and federal laws.



There are no conditions or requirements that are imposed by the DSE or any other entity that may compromise the independence of the Wisconsin SILC. The Wisconsin SILC and the DSE work hard to maintain the independence of the Wisconsin SILC by not having language in grant award agreements that may inadvertently compromise the Wisconsin SILC's autonomy.

The Wisconsin SILC has implemented comprehensive fiscal policies and procedures to ensure proper internal controls and fiscal accountability.

Several processes are in place to ensure proper internal financial controls are in place including the SILC Treasurer reviewing each month's bank statements, check signing limitations, an annual independent financial audit, monthly grant claims, and quarterly program and budget reports submitted to the DSE.

## **5.2 SILC Resource plan**

**Resources (including necessary and sufficient funding, staff/administrative support, and in-kind), by funding source and amount, for SILC to fulfill all duties and authorities.**

### ***Resource Plan***

The Wisconsin SILC Resource Plan totals \$161,783 per year, for a total of \$485,349 for the SPIL three-year period. The Resource Plan includes \$60,000 of Innovation and Expansion (I&E) funds from DVR and \$101,783 in Part B funds (30% of the state's Part B allocation) per year.

The Wisconsin SILC utilizes its Resource Plan funding to carry out operations of the Wisconsin SILC as directed by its Chair and members. Resource Plan funding is also used to contract with a bookkeeper to manage the Wisconsin SILC's financial resources. In addition, if needed, the Wisconsin SILC can request additional administrative support from the DSE. The Wisconsin SILC has a fully executed Memorandum of Agreement (MOA) between the Wisconsin SILC and DSE, which outlines these specific administrative duties and addresses potential conflicts of interest. The Wisconsin SILC explored options regarding the possibilities of hiring a staff person in Federal Fiscal Year (FFY) 2021. During FFY 2021 and 2022, the Wisconsin SILC is meeting its staffing obligations through its Board Members and the use of a contracted bookkeeper. In FFY 2022, the SILC hired a full-time Program Coordinator to carry out the functions of the SILC in partnership with Board Members. Funding from the Resource Plan is being utilized to fund the Program Coordinator and contracted bookkeeper in FFY 2022 - 2024.

The DSE carries out its roles and responsibilities as outlined in the DSE assurances. The DSE does not retain any federal Part B funds and staff positions are 100% funded with state general purpose revenue. When DSE staff are utilized to provide administrative support to the Wisconsin SILC, DSE staff time is tracked and utilized as in-kind match as needed for new or additional federal funds which require a state match.

Resource Plan funding is sufficient to support the operations and functions of the Wisconsin SILC including, but not limited to: staffing, office administration cost; operational costs; contractual services; SILC member training and development; staff training and development; travel both in and out-of-state for staff and SILC members; assisting the IL Network; and any reasonable accommodations for SILC members, staff, or the public to fully participate in meetings.

The Resource Plan ensures the SILC's ability to perform the duties and authorities of SILC:

(1) Duties. – The Council shall

(A) develop the State plan as provided in section 704(a)(2);

(B) monitor, review, and evaluate the implementation of the State plan;

(C) meet regularly, and ensure that such meetings of the Council are open to the public and sufficient advance notice of such meetings is provided;

(D) submit to the Administrator such periodic reports as the Administrator may reasonably request, and keep such records, and afford such access to such records, as the Administrator finds necessary to verify the information in such reports; and

(E) as appropriate, coordinate activities with other entities in the State that provide services similar to or complimentary to independent living services, such as entities that facilitate the provision of or provide long-term community-based services and supports.

(2) Authorities. – The Council may, consistent with the State plan described in section 704, unless prohibited by State law –

(A) in order to improve services provided to individuals with disabilities, work with Centers for Independent Living to coordinate services with public and private entities as part of the IL Network and toward the goals and objectives including the IL Network;

(B) conduct resource development activities to support the activities described in this subsection or to collaborate and support the provision of Independent Living services by Centers for Independent Living; SILC will participate in the goals and objectives outlined in the Plan to support the SILC and the Centers for Independent Living.

(C) perform such other functions, consistent with the purpose of this chapter and comparable to other functions described in this subsection, as the Council determines to be appropriate.

### ***Process to Develop Resource Plan***

To develop the Resource Plan, the Wisconsin SILC analyzes their annual cost analysis detailing the actual costs of maintaining and operating the Wisconsin SILC to determine if financial resources provided are sufficient. The Wisconsin SILC utilizes this information to develop the Resource Plan.

The Resource Plan is then presented to the full SILC for approval. The SILC then works collaboratively with the Independent Living Centers (ILCs) on the Resource Plan to discuss any additional financial or staffing support needed to carry out operations and functions of the SILC.

All funds included in the Resource Plan are based upon prior years of financial information and commitment from the DSE, subject to state appropriation amounts. Should changes in appropriations occur, the SILC in consultation with the DSE, will develop a plan to address the changes in the SILC Resource Plan. If the SILC needs more funding at any time to achieve its operations and functions it notifies the DSE as soon as possible, so additional resources can be located in a timely manner.

### ***Process for Disbursement***

The DSE issues funds to the Wisconsin SILC as outlined in the State Plan for Independent Living (SPIL) Resource Plan and follows Wisconsin Department of Health Services (DHS) grant award processes. The DSE allocates I&E, Part B funds, and Part B match funds on a federal fiscal year basis (October 1 – September 30).

Prior to receiving these funds and issuance of contracts, the DSE develops a scope of work based on the work activities and goals outlined in the SPIL or in relation to federal and state statutes and intended funding purposes. These scopes of work are reviewed and approved by the IL Network and DHS fiscal and contract staff.

The DSE then issues grant continuation packet to be completed by the Wisconsin SILC. The grant continuation packet is issued 60 days prior to the start of the fiscal year. The grant continuation packet includes a budget form to be completed, scope of work, and quarterly program and budget reports. The grant packets are due to the DSE 30 days prior to the start of the fiscal year. Proposed budgets are reviewed and approved by the DSE and Wisconsin Division of Vocational Rehabilitation (DVR). Grant funds are available at the start of the fiscal year and are available to draw upon on a monthly basis.

The Wisconsin SILC submits SPIL progress reports and budget reports on a quarterly basis. The Wisconsin SILC submits a copy of their annual Program Performance Report to the DSE and DVR. The Wisconsin SILC submits a copy of their annual financial audits to the DSE.

To date, based on the outlined process above, there has not been an undue hardship experienced by the Wisconsin SILC during the previous SPIL three-year period. If this process places an undue hardship, the Wisconsin SILC will notify the DSE and the DSE will try to address these concerns in a timely and efficient manner.

## **5.3 Maintenance of SILC**

### **How State will maintain SILC over the course of the SPIL.<sup>[1]</sup>**

#### ***Appointment Process***

Individuals interested in serving on the Wisconsin SILC must apply through the Governor's website or by contacting the Governor's appointment staff. A person may request a reasonable accommodation if they are unable to apply to serve via the Governor's website. Once the applicant has submitted the required documentation, the Governor's office completes a

background check, and forwards the applicant's information and documentation to the Wisconsin SILC Chair.

The Wisconsin SILC Chair or their designee interviews the applicant via phone, in-person, or by alternative communication technology. The purpose of the interview is to gather information about the applicant's commitment to serve on the Wisconsin SILC, and to assess their basic knowledge of the Independent Living Movement. The completed interview documentation and application documents are sent to the entire Wisconsin SILC for review and approval.

Once the interview is complete, the applicant is required to attend either a quarterly meeting or an Executive Committee meeting, whichever occurs first.

After the applicant attends a meeting, the SILC members vote to either approve or disapprove the applicant's appointment to the Wisconsin SILC. The Wisconsin SILC Chair or their designee then sends a letter to the Governor's office stating either a recommendation for the Governor to appoint the applicant to the Wisconsin SILC or to deny appointment for any given reason. The Governor's office then sends the Oath of Office to the new SILC member and the appointment paperwork to the Wisconsin SILC Chair or their designee.

### ***Appointment Authority***

Members of the Wisconsin SILC are appointed by the Governor's office.

### ***SILC Composition and Qualifications***

The Wisconsin SILC works collaboratively with Governor's office to ensure federally mandated membership requirements are met. Furthermore, the Wisconsin SILC Chair works with the Governor's appointment staff to ensure that Wisconsin SILC membership rosters accurate and any vacancies are filled in a timely manner.

The Wisconsin SILC proactively recruits potential members through marketing materials made available via email, hard copy, newsletters, and on its website. These recruitment materials are shared with ILCs, WCILC, and the Governor's office. Wisconsin SILC communicates membership needs to the Governor's office and Wisconsin IL Network to recruit qualified members that meet the SILC's membership needs. Factors considered in the recruitment of new SILC members include skills, abilities, knowledge of IL, and current SILC vacancies. The Wisconsin SILC also seeks to recruit members who are representative of underserved populations or geographic regions of the state as identified in the SPIL.

### ***Chair Election***

The Chair of the Wisconsin SILC is elected to a two-year term by the full SILC, in the summer of even numbered years. In the event that the Chair vacates their position prematurely or is unable to serve, the Vice-Chair will assume the powers and function of the Chair until the next scheduled election of officers.

### ***Term Limits and Vacancies***

Wisconsin SILC members are appointed to a three-year term. At the end of their three year term, they can reapply to serve a second three-year term or end their service on the Wisconsin SILC. SILC members can only serve for two consecutive three year terms. Sixty days prior to a member's three year-term expiring, the SILC Chair sends an email inquiring about the SILC's member desire to continue to serve or end their service. If the SILC member indicates they no longer wish to serve or have met the two consecutive term limit, the SILC Chair notifies the IL Network, SILC members, and Governor's office about the impending vacancy and the member type needed to fill this vacancy. The Wisconsin SILC then increases membership recruitment efforts to ensure vacancy is filled in a timely manner.

If a SILC member is unable to serve their three-year term due to hardship they are to notify the SILC Chair. The SILC Chair will then determine with the member if they need a leave of absence or need to resign. If a member is unable to complete their term and a vacancy occurs, the SILC Chair notifies the IL Network, SILC members, and Governor's office about the impending vacancy and the member type needed to fill this vacancy and ensure membership compliance.

### ***Staffing of SILC***

The Wisconsin SILC employs one full-time employee (Program Coordinator) to carry out operations of the Wisconsin SILC as directed by its Chair and SILC members. The Wisconsin SILC also contracts with a bookkeeper to manage the Wisconsin SILC's financial resources.

Current SILC staffing has been sufficient to support the operations and functions of the Wisconsin SILC. The Program Coordinator works for and reports to the Independent Living Council of Wisconsin (ILCW) to enhance independent living services for individuals with disabilities throughout the state. The Program Coordinator works in collaboration with the Department of Health Services, which is the state funder and the DSE. This position also works in collaboration with Wisconsin's eight independent living centers, and the Wisconsin Coalition of Independent Living Centers (WCILC).

The Program Coordinator is responsible for working with the Wisconsin SILC in coordinating the development, implementation, evaluation, and reporting of the three-year State Plan for Independent Living (SPIL). This position is also responsible for related grant program and financial reporting to the Wisconsin Department of Health Services and the U.S. Department of Health and Human Services.

The Program Coordinator executes daily tasks including coordinating Wisconsin SILC's quarterly and committee meetings, and administration of the SILC's planning activities and operations.

The Wisconsin SILC Program Coordinator, consistent with federal and state laws, is supervised by the Wisconsin SILC Chair and Vice-Chair. Furthermore, the Wisconsin SILC Program Coordinator is evaluated by Wisconsin SILC per the staff evaluation schedule in accordance with the approved personnel policies. Personnel policies of Wisconsin SILC are approved and reviewed periodically by the full SILC.

The Wisconsin SILC operates in accordance with the following approved policies that ensure that the SILC has the autonomy to operate and conduct its required duties and the granted authorities:

- By-laws;
- Member Policies and Procedures;
- Fiscal Policies and Procedures;
- Personnel Policies; and
- Wisconsin SILC Member Orientation and Ongoing Training.

### ***State Assurances***

The DSE has received documentation of the Independent Living Council of Wisconsin being a 501(c)(3) non-profit corporation under which the Wisconsin SILC is established and operated. The DSE received copies of the Wisconsin SILC's 990 and annual financial audit to ensure it is established and operating.

The Governor's office notifies the DSE if there are vacancies on the Wisconsin SILC and if applicants are in que to fill these vacancies. This allows the DSE to work collaboratively with the Wisconsin SILC to fill any vacancies in a timely manner to remain in compliance.

The Wisconsin SILC is an independent non-profit corporation and has its own central office. It is not part of a state agency.

The Wisconsin SILC has autonomy to fulfill its federal requirements and financial resources to be able to meet its responsibilities as outlined in federal statute, the SPIL, and SILC assurances. If the Wisconsin SILC finds that it does not have the resources needed to fulfill these duties at any time, the SILC is asked to contact the DSE so staff support for administrative functions as outlined in the MOA or funding can be provided to assist the SILC in meeting its needs for this purpose.

If the Wisconsin SILC identifies at any time that the funding provided in the Resource Plan is inadequate to achieve its operations and functions, the SILC should notify the DSE as soon as possible, so additional resources can be located in a timely manner.

## **Section 6: Legal Basis and Certifications**

### **6.1 Designated State Entity (DSE)**

The state entity/agency designated to receive and distribute funding, as directed by the SPIL, under Title VII, Part B of the Act is Wisconsin Department of Health Services, Division of Public Health, Bureau of Aging and Disability Resources. Authorized representative of the DSE Carrie Molke Title Bureau Director.

### **6.2 Statewide Independent Living Council (SILC)**

The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State is Independent Living Council of Wisconsin.

### **6.3 Centers for Independent Living (CILs)**

The Centers for Independent Living (CILs) eligible to sign the SPIL, a minimum of 51% whom must sign prior to submission, are:

Access to Independence

Center for Independent Living for Western Wisconsin

Independence First

Independent Living Resources

Midstate Independent Living Choices

North Country Independent Living DBA indiGO

Options for Independent Living

Society's Assets, Incorporated

### **6.4 Authorizations**

6.4.a. The SILC is authorized to submit the SPIL to the Independent Living Administration, Administration for Community Living. Yes (Yes/No)

6.4.b. The SILC and CILs may legally carryout each provision of the SPIL. Yes (Yes/No)

6.4.c. State/DSE operation and administration of the program is authorized by the SPIL.

Yes (Yes/No)

## **Section 7: DSE Assurances**

Carrie Molke acting on behalf of the DSE Wisconsin Department of Health Services, Division of Public Health, Bureau of Aging and Disability Resources located at 1 W. Wilson St, Room 551, Madison, WI 53701, 608- 267-5267, Carrie.Molke@dhs.wisconsin.gov  
*45 CFR 1329.11* assures that:

- 7.1. The DSE acknowledges its role on behalf of the State, as the fiscal intermediary to receive, account for, and disburse funds received by the State to support Independent Living Services in the State based on the plan;
- 7.2. The DSE will assure that the agency keeps appropriate records, in accordance with federal and state law, and provides access to records by the federal funding agency upon request;
- 7.3. The DSE will not retain more than 5 percent of the funds received by the State for any fiscal year under Part B for administrative expenses;<sup>1</sup>
- 7.4. The DSE assures that the SILC is established as an autonomous entity within the State as required in *45 CFR 1329.14*;
- 7.5. The DSE will not interfere with the business or operations of the SILC that include but are not limited to:
  1. Expenditure of federal funds
  2. Meeting schedules and agendas
  3. SILC board business
  4. Voting actions of the SILC board
  5. Personnel actions
  6. Allowable travel
  7. Trainings
- 7.6. The DSE will abide by SILC determination of whether the SILC wants to utilize DSE staff:
  1. If the SILC informs the DSE that the SILC wants to utilize DSE staff, the DSE assures that management of such staff with regard to activities and functions performed for the SILC is the sole responsibility of the SILC in accordance with Sec. 705(e)(3) of the Act (Sec. 705(e)(3), 29 U.S.C.796d(e)(3)).
- 7.7. The DSE will fully cooperate with the SILC in the nomination and appointment process for the SILC in the State;



- 7.8. The DSE shall make timely and prompt payments to Part B funded SILC and CILs:
1. When the reimbursement method is used, the DSE must make a payment within 30 calendar days after receipt of the billing, unless the agency or pass-through entity reasonably believes the request to be improper;
  2. When necessary, the DSE will advance payments to Part B funded SILC and CILs to cover its estimated disbursement needs for an initial period generally geared to the mutually agreed upon disbursing cycle; and
  3. The DSE will accept requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as necessary when electronic fund transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r).

The signature below indicates this entity/agency's agreement to: serve as the DSE and fulfill all the responsibilities in Sec. 704(c) of the Act; affirm the State will comply with the aforementioned assurances during the three-year period of this SPIL; and develop, with the SILC, and ensure that the SILC resource plan is necessary and sufficient (in compliance with section 8, indicator (6) below) for the SILC to fulfill its statutory duties and authorities under Sec. 705(c) of the Act, consistent with the approved SPIL.<sup>1</sup>

Carrie Molke, Bureau Director

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Name and Title of DSE director/authorized representative

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Signature

Date

Electronic signature may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC

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

### **8.1 Assurances**

Jason Endres acting on behalf of the SILC Independent Living Council of Wisconsin located at 3810 Milwaukee St., Madison, WI 53714, 608-575-9293,  
ilcwinfo@gmail.com 45 CFR 1329.14 assures that:

- (1) The SILC regularly (not less than annually) provides the appointing authority recommendations for eligible appointments;
- (2) The SILC is composed of the requisite members set forth in the Act;<sup>1</sup>
- (3) The SILC terms of appointment adhere to the Act;<sup>1</sup>
- (4) The SILC is not established as an entity within a State agency in accordance with 45 CFR Sec. 1329.14(b);
- (5) The SILC will make the determination of whether it wants to utilize DSE staff to carry out the functions of the SILC;
  - a. The SILC must inform the DSE if it chooses to utilize DSE staff;
  - b. The SILC assumes management and responsibility of such staff with regard to activities and functions performed for the SILC in accordance with the Act.<sup>1</sup>
- (6) The SILC shall ensure all program activities are accessible to people with disabilities;
- (7) The State Plan shall provide assurances that the designated State entity, any other agency, office, or entity of the State will not interfere with operations of the SILC, except as provided by law and regulation and;
- (8) The SILC actively consults with unserved and underserved populations in urban and rural areas that include, indigenous populations as appropriate for State Plan development as described in Sec. 713(b)(7) the Act regarding Authorized Uses of Funds.<sup>1</sup>

### **8.2 Indicators of Minimum Compliance**

Indicators of minimum compliance for Statewide Independent Living Councils (SILC) as required by the Rehabilitation Act (Section 706(b), 29 U.S.C. Sec 796d-1(b)), as amended and supported by 45 CFR 1329.14-1329.16; and Assurances for Designated State Entities (DSE) as permitted by Section 704(c)(4) of the Rehabilitation Act (29 U.S.C. Sec. 796c(c)(4)), as amended.

(a) STATEWIDE INDEPENDENT LIVING COUNCIL INDICATORS. –

- (1) SILC written policies and procedures must include:
  - a. A method for recruiting members, reviewing applications, and regularly providing recommendations for eligible appointments to the appointing authority;
  - b. A method for identifying and resolving actual or potential disputes and conflicts of interest that are in compliance with State and federal law;

- c. A process to hold public meetings and meet regularly as prescribed in 45 CFR 1329.15(a)(3);
  - d. A process and timelines for advance notice to the public of SILC meetings in compliance with State and federal law and 45 CFR 1329.15(a)(3);
  - e. A process and timeline for advance notice to the public for SILC “Executive Session” meetings, that are closed to the public, that follow applicable federal and State laws;
    - i. “Executive Session” meetings should be rare and only take place to discuss confidential SILC issues such as but not limited to staffing.
    - ii. Agendas for “Executive Session” meetings must be made available to the public, although personal identifiable information regarding SILC staff shall not be included;
  - f. A process and timelines for the public to request reasonable accommodations to participate during a public Council meeting;
  - g. A method for developing, seeking and incorporating public input into, monitoring, reviewing and evaluating implementation of the State Plan as required in 45 CFR 1329.17; and
  - h. A process to verify centers for independent living are eligible to sign the State Plan in compliance with 45 CFR 1329.17(d)(2)(iii).
- (2) The SILC maintains regular communication with the appointing authority to ensure efficiency and timeliness of the appointment process.
- (3) The SILC maintains individual training plans for members that adhere to the SILC Training and Technical Assistance Center’s SILC training curriculum.
- (4) The SILC receives public input into the development of the State Plan for Independent Living in accordance with 45 CFR 1329.17(f) ensuring:
- a. Adequate documentation of the State Plan development process, including but not limited to, a written process setting forth how input will be gathered from the state’s centers for independent living and individuals with disabilities throughout the state, and the process for how the information collected is considered.
  - b. All meetings regarding State Plan development and review are open to the public and provides advance notice of such meetings in accordance with existing State and federal laws and 45 CFR 1329.17(f)(2)(i)-(ii);
  - c. Meetings seeking public input regarding the State Plan provides advance notice of such meetings in accordance with existing State and federal laws, and 45 CFR 1329.17(f)(2)(i);
  - d. Public meeting locations, where public input is being taken, are accessible to all people with disabilities, including, but not limited to:
    - i. proximity to public transportation,
    - ii. physical accessibility, and

- iii. effective communication and accommodations that include auxiliary aids and services, necessary to make the meeting accessible to all people with disabilities.
  - e. Materials available electronically must be 508 compliant and, upon request, available in alternative and accessible format including other commonly spoken languages.
- (5) The SILC monitors, reviews and evaluates the State Plan in accordance with 45 CFR 1329.15(a)(2) ensuring:
  - a. Timely identification of revisions needed due to any material change in State law, state organization, policy or agency operations that affect the administration of the State Plan approved by the Administration for Community Living.
- (6) The SILC State Plan resource plan includes:
  - a. Sufficient funds received from:
    - i. Title VII, Part B funds;
      - 1. If the resource plan includes Title VII, Part B funds, the State Plan provides justification of the percentage of Part B funds to be used if the percentage exceeds 30 percent of Title VII, Part B funds received by the State;
    - ii. Funds for innovation and expansion activities under Sec. 101(a)(18) of the Act, 29 U.S.C. Sec. 721(a)(18), as applicable;
    - iii. Other public and private sources.
  - b. The funds needed to support:
    - i. Staff/personnel;
    - ii. Operating expenses;
    - iii. Council compensation and expenses;
    - iv. Meeting expenses including meeting space, alternate formats, interpreters, and other accommodations;
    - v. Resources to attend and/or secure training and conferences for staff and council members and;
    - vi. Other costs as appropriate.

The signature below indicates the SILC’s agreement to comply with the aforementioned assurances and indicators:

\_\_\_\_\_ Jason Endres

Name of SILC chairperson

\_\_\_\_\_ Signature

\_\_\_\_\_ Date

Electronic signature may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.

## Section 9: Signatures

The signatures below are of the SILC chairperson and at least 51 percent of the directors of the centers for independent living listed in section 6.3. These signatures indicate that the Independent Living Council of Wisconsin and the centers for independent living in the state agree with and intend to fully implement this SPIL's content. These signatures also indicate that this SPIL is complete and ready for submission to the Independent Living Administration, Administration for Community Living, U.S. Department of Health and Human Services. The effective date of this SPIL is October 1, 2020 (year)

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SIGNATURE OF SILC CHAIRPERSON DATE

Jason Endres

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NAME OF SILC CHAIRPERSON

Access to Independence

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NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

---

SIGNATURE OF CIL DIRECTOR DATE

Jason Beloungy

---

NAME OF CIL DIRECTOR

Center for Independent Living for Western Wisconsin

---

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

---

SIGNATURE OF CIL DIRECTOR DATE

Kyle Kleist

---

NAME OF CIL DIRECTOR

Independence First

---

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

---

SIGNATURE OF CIL DIRECTOR DATE

Marci Boucher

---

NAME OF CIL DIRECTOR

Independent Living Resources

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NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

---

SIGNATURE OF CIL DIRECTOR DATE

Sara Eckland

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NAME OF CIL DIRECTOR

Midstate Independent Living Choices

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Don Wigington

NAME OF CIL DIRECTOR

North Country Independent Living DBA indiGO

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Jill Nyberg

NAME OF CIL DIRECTOR

Options for Independent Living

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Josh Theis

NAME OF CIL DIRECTOR

Society's Assets, Inc.

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Karl Kopp

NAME OF CIL DIRECTOR

Electronic signatures may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.