

# 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: 2025-2027

Effective Date: 10/01/2024

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## EXECUTIVE SUMMARY

The focus of Wisconsin's 2025-2027 State Plan for Independent Living (SPIL) is on moving the Wisconsin Independent Living Network (WILN) to include a focus on civil rights, social justice, and advocacy. The mission of this SPIL represents this shift and is: Empowering people with disabilities to live the way they choose.

WILN is made up of four distinct groups. The Independent Living Council of Wisconsin (ILCW) is Wisconsin's Statewide Independent Living Council (SILC). Wisconsin's eight Independent Living Centers (ILCs) are also a part of the network. The centers work together through the Wisconsin Coalition of Independent Living Centers (WCILC). The Wisconsin Department of Health Services (DHS) provides additional support and is Wisconsin's Designated State Entity (DSE).

WILN has experienced a great deal of change over the course of the 2021-2024 SPIL. There have been leadership changes at most ILCs, WCILC, and ILCW. During this period, the Council and

WILN's focus has been on building and strengthening the IL network and movement in our state. The 2025-2027 SPIL will build upon and expand that progress.

SPIL development has also served to further develop WILN. The process has been a collaborative effort; it has included representatives from all four of WILN's partners (ILCW, DSE, WCILC, and ILCs). Input for the SPIL was also provided by consumers, Aging and Disability Resource Center (ADRC) staff, and other stakeholders in the disability community.

To fulfill the mission of the SPIL, our goals will focus on improving equity among ILCs, increasing outreach both to underserved geographic areas and to historically excluded communities, and ensuring that Council members, board members, and staff are well informed about issues which are important to the IL movement and disability community. The 2025-2027 SPIL goals are:

1. People with disabilities in Wisconsin will have access to independent living core services of the highest quality.
2. Wisconsin Independent Living Network (WILN) will improve funding equity across Wisconsin's eight Independent Living Centers.
3. WILN will engage in advocacy leadership to expand opportunities for persons with disabilities to participate in systems advocacy at the local, state, and national levels on an annual basis.
4. WILN will be well informed about issues important to the Independent Living movement both statewide and nationally.

Another major component of the 2025-2027 SPIL is to clarify the IL Network's financial plan. The term "base funds" refers to funds appropriated under federal and state law that provide general support for the operation of Centers for Independent Living and support the provision independent living services - when those funds are generally expected to be available from year-to-year. WILN considers base funds to be those authorized under Title VII, Chapter 1, subchapter C (referred to as Part C) of the Rehabilitation Act of 1973, as amended; state Social Security Reimbursement (SSA) funds; and funds directed under Wisconsin Statute 46.96(2) (GPR).

The State of Wisconsin's ILCs have funding equity values which have been described in our prior SPIL. These values remain in place, but some clarification and updates are needed to ensure that ILCs continue to be funded equitably so they can expand their independent living core service delivery more fully across their service areas, both to areas that are geographically underserved and to better reach historically excluded communities.

The new financial plan sets a new base funding level at \$626,400 per center per year, which is based on previous SPIL's base funding levels with adjustments for inflation. The definition for this term has been updated for greater clarity. Finally, there is a better explanation of what should happen if there is new one-time funding, new continuous funding, reduced funding, and if an ILC should close.

The other area in which the Wisconsin SILC will be focused on this SPIL three-year period is the financial plan. Although Wisconsin provides independent living 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 independent living core services to more people with disabilities statewide.

For the 2025-2027 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 and meet SILC assurances. Per guidance from ACL, Federal Fiscal Year 2024 SILC Resource Plan and ILC funding allocations were added to the SPIL.

WCILC is allocated at least \$65,000 annually for the three-year SPIL period for reporting on WILN SPIL goals and to support network activities such as IL Days, ILC Peer Reviews, trainings, etc. on an annual basis, for a total of \$195,000 over the three-year SPIL period.

Funds for independent living services and general ILC operations is allocated amongst Wisconsin's eight ILCs. ILCs receive Part C funds directly. The Designated State Entity (DSE) allocates Part B (federal and state match), independent living state general purpose revenue (GPR), and Social Security Reimbursement (SSA) funds to the ILCs.

The DSE does not take any of the allowable Part B allocation. Those funds are allocated 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.

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

## 1.1 - MISSION

Mission of the Independent Living Network and the SPIL

Empowering people with disabilities to live the way they choose.

## 1.2 - GOALS

Goals of the SPIL

Goal #1: People with disabilities in Wisconsin will have access to independent living core services of the highest quality.

Goal #2: Wisconsin Independent Living Network (WILN) will improve funding equity across Wisconsin's eight Independent Living Centers.

Goal #3: WILN will engage in advocacy leadership to expand opportunities for persons with disabilities to participate in systems advocacy at the local, state, and national levels on an annual basis.

Goal #4: WILN will be well informed about issues important to the Independent Living movement both statewide and nationally.

## 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: People with disabilities in Wisconsin will have access to independent living core services of the highest quality.

Objective #1.1: All ILCs will increase their total number of information and referral (landR) contacts and consumer information files (CIF) for IL core service per each ILC service area.

**Measurable Indicators:**

Indicator #1.1.1: 70% of Wisconsin's 72 counties will have at least 1% of persons with disabilities served by their local ILC.

Indicator #1.1.2: 77.5% of Wisconsin's 72 counties will have at least 1% of persons with disabilities served by their local ILC.

Indicator #1.1.3: 85% of Wisconsin's 72 counties will have at least 1% of persons with disabilities served by their local ILC.

**Other Objective info and/or Activities (optional):**

**Geographic Scope:** Statewide

Objective #1.2: People with disabilities in the state of Wisconsin will lead more independent lives of their choosing.

**Measurable Indicators:**

Indicator #1.2.1: 80% of consumers receiving IL core services will have "successfully completed all goals" when their individual CIF is closed.

**Other Objective info and/or Activities (optional):**

**Geographic Scope:** Statewide

Objective #1.3: ILCs will operate in a manner consistent with best practices outlined in Quality Indicators for Independent Living Services (QUILS)

**Measurable Indicators:**

Indicator #1.3.1: On an annual basis, at least one ILC will complete a QUILS peer review.

**Other Objective info and/or Activities (optional):**

**Geographic Scope:** Other(ILCs)

Goal #2: Wisconsin Independent Living Network (WILN) will improve funding equity across Wisconsin's eight Independent Living Centers.

Objective #2.1: The network of ILCs will establish a formula to ensure that once all 8 ILCs have achieved a base funding threshold, additional funds will be appropriately distributed to best meet underserved populations and/or geographic regions.

**Measurable Indicators:**

Indicator #2.1.1: Development of new funding formula.

Indicator #2.1.2: Implementation of formula as part of WCILC funding equity agreement.

**Other Objective info and/or Activities (optional):**

**Geographic Scope:**

Goal #3: WILN will engage in advocacy leadership to expand opportunities for persons with disabilities to participate in systems advocacy at the local, state, and national levels on an annual basis.

Objective #3.1: WILN will cultivate relationships (area specific to each ILC) with the Wisconsin Legislature.

**Measurable Indicators:**

Indicator #3.1.1: Number of legislators visited, and issues discussed.

Indicator #3.1.2: Number of legislators that tour individual centers, and number invitations provided to legislators to tour individual centers.

**Other Objective info and/or Activities (optional):**

**Geographic Scope:** Statewide

Objective #3.2: WILN will encourage active participation by consumers and ILC Board members in systems advocacy activities.

**Measurable Indicators:**

Indicator #3.2.1: Year-to-year increase in percentage of consumers, ILC/SILC board members engaged in systems advocacy activities.

Indicator #3.2.2: Increase in consumers with systems advocacy goals or individual advocacy goals.

Indicator #3.2.3: Training provided to consumers and ILC/SILC staff and board members on engaging legislators and lobbying restrictions.

**Other Objective info and/or Activities (optional):**

**Geographic Scope:** Statewide

Objective #3.3: WILN will use an intersectional approach for systems advocacy efforts.

**Measurable Indicators:**

Indicator #3.3.1: Caucuses developed for different intersectional groups (e.g. BIPOC, aging, LGBTQIA+, youth, etc.)

Indicator #3.3.2: Caucuses developed for disability groups (e.g. Blind/Low Vision, Deaf/Hard of Hearing, Neurodiversity, Mental Health/Substance use Disabilities, etc.)

Indicator #3.3.3: Training provided about intersectionality and/or Equity Diversity and Inclusion to ILC Staff, ILCW council members, and WCILC board members.

Indicator #3.3.4: Increase in opportunities for BIPOC leadership through internal and external activities (e.g. advisory committees, WILN advocacy committees, council membership, etc.)

**Other Objective info and/or Activities (optional):**

**Geographic Scope:** Statewide

Goal #4: WILN will be well informed about issues important to the Independent Living movement both statewide and nationally.

Objective #4.1: Trainings will be provided to the entire Wisconsin IL network and partner organizations.

**Measurable Indicators:**

Indicator #4.1.1: WILN will provide at least two webinars and/or in-person trainings annually.

**Other Objective info and/or Activities (optional):**

**Geographic Scope:** Statewide

Objective #4.2: ILCW members and staff will continue to engage in training opportunities.

**Measurable Indicators:**

Indicator #4.2.1: ILCW members and staff will each complete at least 10 hours of training related to the IL Movement, SILCs, and issues important to person with disabilities each fiscal year.

**Other Objective info and/or Activities (optional):**

**Geographic Scope:** Statewide

## 1.4 - EVALUATION

Wisconsin SILC conducted a needs assessment to evaluate the needs of people with disabilities across the state of Wisconsin. The survey was available through two online platforms (Google Forms and Survey Monkey). Any citizen of the State of Wisconsin who was interested in providing information to the Wisconsin SILC was eligible to complete the survey. WCILC and ILCs provided ILCW with Program Performance Report data for the duration of the 2021-2024 SPIL, ILC consumer satisfaction survey data, and consumer barriers survey. This data was analyzed by the Wisconsin SILC.

The Wisconsin SILC had three in-person public hearing sessions. A comment session was conducted at a statewide conference to solicit input from the Wisconsin Aging, Disability, and Independent Living Network, which includes ILCs, ADRCs, DSE, partner organizations, and Governor-appointed councils, committees, and commissions. The Survey Monkey and Google Forms platforms were used for collection of data from those who wished to comment on the 2025-2027 SPIL but were unable to attend in-person hearings.

Information from analysis of survey data and public comments was used to develop the SPIL for 2025-2027.

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. When services with consumers are completed, Wisconsin ILCs provide consumers with both a satisfaction survey and an advocacy priorities survey; the data from these surveys are collected and analyzed on an annual basis. Information is used both for evaluation of the current SPIL and in development of future SPILs.

## 1.5 - PART I: FINANCIAL PLAN

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

Fiscal Year(s): 2025

October 1, 2024 to September 30, 2025

Sources	Projected Funding Amounts and Uses					
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Admin. Costs	TOTAL
Title VII Funds						
Chapter 1, Part B	\$81783	\$215477	\$0	\$85000	\$0	\$382260
Chapter 1, Part C	\$0	\$0	\$1408645	\$0		\$1408645
						\$1790905
Other Federal Funds						
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$80000	\$0	\$0	\$0		\$80000

Social Security Reimbursement	\$0	\$0	\$600000	\$0		\$600000
Other	\$0	\$0	\$0	\$0		\$0
						\$680000
Non-Federal Funds						
Part B State Match	\$0	\$0	\$0	\$0	\$0	\$0
Other State Match for Funds in SPIL	\$0	\$0	\$0	\$0	\$0	\$0
State Funds	\$0	\$0	\$983500	\$0	\$0	\$983500
Other	\$0	\$0	\$0	\$0	\$0	\$0
						\$983500
TOTAL	\$161783	\$215477	\$2992145	\$85000	\$0	\$3454405

Fiscal Year(s): 2026

October 1, 2025 to September 30, 2026

Sources	Projected Funding Amounts and Uses					
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Admin. Costs	TOTAL
Title VII Funds						
Chapter 1, Part B	\$101783	\$215477	\$0	\$65000	\$0	\$382260

Chapter 1, Part C	\$0	\$0	\$1408645	\$0		\$1408645
						\$1790905
Other Federal Funds						
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$60000	\$0	\$0	\$0		\$60000
Social Security Reimbursement	\$0	\$0	\$600000	\$0		\$600000
Other	\$0	\$0	\$0	\$0		\$0
						\$660000
Non-Federal Funds						
Part B State Match	\$0	\$0	\$0	\$0	\$0	\$0
Other State Match for Funds in SPIL	\$0	\$0	\$0	\$0	\$0	\$0
State Funds	\$0	\$0	\$983500	\$0	\$0	\$983500
Other	\$0	\$0	\$0	\$0	\$0	\$0
						\$983500
TOTAL	\$161783	\$215477	\$2992145	\$65000	\$0	\$3434405

Fiscal Year(s): 2027

October 1, 2026 to September 30, 2027

Sources	Projected Funding Amounts and Uses					
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Admin. Costs	TOTAL
Title VII Funds						
Chapter 1, Part B	\$101783	\$215477	\$0	\$65000	\$0	\$382260
Chapter 1, Part C	\$0	\$0	\$1408645	\$0		\$1408645
						\$1790905
Other Federal Funds						
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$60000	\$0	\$0	\$0		\$60000
Social Security Reimbursement	\$0	\$0	\$600000	\$0		\$600000
Other	\$0	\$0	\$0	\$0		\$0
						\$660000

Non-Federal Funds						
Part B State Match	\$0	\$0	\$0	\$0	\$0	\$0
Other State Match for Funds in SPIL	\$0	\$0	\$0	\$0	\$0	\$0
State Funds	\$0	\$0	\$983500	\$0	\$0	\$983500
Other	\$0	\$0	\$0	\$0	\$0	\$0
						\$983500
TOTAL	\$161783	\$215477	\$2992145	\$65000	\$0	\$3434405

## 1.5.2 - PART II: FINANCIAL PLANNING NARRATIVE

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

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

\$34,200 is provided in state general purpose revenue (GPR), which is associated with state match, separate from GPR funds designated for independent living services. The DSE does not retain any federal Part B funds and staff positions are 100% funded with state general purpose revenue and federal grant funds. When DSE staff are utilized to provide administrative support to the Wisconsin SILC, DSE staff time is tracked and utilized as an 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 and meet SILC assurances.

### *Other SPIL Activities*

WCILC is allocated at least \$65,000 on an 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:

1. People with disabilities in Wisconsin will have access to independent living core services of the highest quality.
2. Wisconsin Independent Living Network (WILN) will improve funding equity across the Wisconsin's eight Independent Living Centers.

3. WILN will engage in advocacy leadership to expand opportunities for persons with disabilities to participate in systems advocacy at the local, state, and national levels on an annual basis.
4. WILN will be well informed about issues important to the Independent Living movement both statewide and nationally.

### **IL Services and General ILC Operations**

The IL services and general ILC operations are allocated amongst Wisconsin's eight ILCs. ILCs receive Part C 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

There have been changes in ILC operating funds and one-time increases. This has not improved the ability of most ILCs to maintain their current level of independent living services and furthered funding inequity among the state's eight ILCs. 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 believes in keeping the values of funding equity among the ILCs and believes that clarity is needed to ensure equity is achieved and remains.

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

A strong statewide network ensures access to IL services for people of all disabilities, and any age. Adherence to funding equity principles, and a clearly defined process, keeps the network strong. The fundamental aspect of funding equity among Wisconsin's ILCs is that no Center substantially benefits more than other Centers, or is more harmed than other Centers, by changes in base funding amounts. To ensure commitment to this equity principle, WILN will incorporate the following methodology regarding changes in base funds.

All ILCs in the Network receive contracts for each of the sources of base funding. However, three Centers in the network receive a much larger Part C award due to how the federal funding formula was determined at the time the Center received its first federal award. With the full support of the entire Network, including the DSE, the five IL Centers with substantially smaller Part C awards receive a larger portion of GPR and SSA funding in an effort to bring equity in base funding to all eight ILCs.

What stifles base funding equity is that there is no current opportunity to reallocate Part C awards. As a result, the Network will rely on any changes made to SSA and GPR funds to address inequity.

Increases in base funding must be directed to support all eight ILCs to reach a base funding threshold of \$626,400. Until all eight ILCs achieve that threshold, increases in base funding will not be utilized in any other manner. The purpose of defining a base funding threshold, and ensuring all eight ILCs reach it, is because that is the minimum amount of base funding needed for any ILC in the state of Wisconsin to adequately serve its multi-county region.

#### *Increases in Base Funding*

The Wisconsin Independent Living Network will use the following methodology when there are increases in the following sources of base funding:

- Increases in Part C funds will not result in a change in SSA or GPR funds for a particular Center unless that Center has reached the base funding threshold of \$626,400.

- When an ILC has reached base funding of \$626,400, any available state funds that result in the Center being above the base funding threshold would be redistributed to the remaining Centers that are below the base funding threshold.
- No ILC will have their total state awards reduced to less than \$10,000.
- Increased state GPR or SSA funds will be directed toward the five Centers that receive significantly smaller Part C awards until they have reached the average total in base funds (in that FFY) that the three Centers that have significantly higher Part C awards receive.
- If the five ILCs that have smaller Part C awards reach the same average total in base funds as the three ILCs that have significantly higher part C awards, and there are additional state funds greater than that average amount, the remaining new state funds will be allocated evenly amongst all eight ILCs until they are all at the base funding threshold.
- If a state funding increase is significant enough, funds should be allocated to bring all eight ILCs up to the base funding threshold defined in this SPIL. Any remaining state funding would be allocated in the manner described below:

*Addressing underserved populations or geographic regions, once all ILCs reach the base funding threshold.*

Once all eight ILCs have reached the defined base funding threshold, any additional state funds will be directed toward addressing underserved populations or areas of the state.

To best determine where these funds should be directed, the Network has engaged in crafting a formula using data and methodology provided by the Department of Health Services Demographer and statistician from the Department of Administration. The product of that effort will yield data sets that will then be agreed upon by the ILC directors. Once those data sets are determined, and potentially weighted for equity, they will be used to create a formula that will identify which ILC would receive the extra funds to address those needs.

The formula will not be used as a way to allocate all GPR and SSA funds directed to the network of Centers.

If there are additional GPR and/or SSA funds to distribute, and a methodology has not been yet agreed upon, the funds will be evenly distributed among the eight ILCs, provided they have all reached the base funding threshold.

#### *Decreases in Base Funding*

Funding equity is not just relevant for base funding increases, and funding decreases can be more consequential. Here are the ways in which adjustments to the allocation of SSA and GPR funds would be made in response to base funding decreases:

If some or all ILCs are below the base funding threshold:

- If Part C funds are decreased enough to cause the three Centers with significantly higher Part C awards to have a total base funding below the average of the other five Centers, then state GPR and SSA funds will be reallocated to keep all eight base funding amounts equitable, to the greatest extent possible.
- If SSA or GPR funds are decreased, the three ILCs with the largest Part C awards would have their GPR and SSA awards reduced (by an equal amount) first, until they were at the minimum amounts possible, and any remaining reductions would be split evenly between the other five ILCs.

If all ILCs are at or above the base funding threshold:

- GPR or SSA funds should be reallocated to the greatest extent possible to keep all ILCs equitable in base funds in the event that Part C, GPR, or SSA awards are decreased.

#### *Reallocation of Part C funds*

The only opportunity to reallocate Part C funds would come if state IL funding (SSA and GPR) funds exceeded the total federal Part B and Part C awards for the state. If that occurred, the ILCs would consider making a request to ACL to become a "723 State", which if approved, would cease all direct funding to the Centers in Wisconsin. All Part B and Part C funds would be distributed in a manner as decided by the network and described in the SPIL. Such a request to become a 723 State requires the approval of no less than two-thirds of ILC directors.

#### *Non-Base Funding Adjustments*

When new non-base funds are made available to the Centers, the methodology described above does not apply.

#### *Funding for a New Center(s) in Wisconsin*

The plans described in this section make clear that the Network will restrict new funds from being used to create a new Center when that may endanger funding to the existing ILCs, 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, and the majority of Center directors have agreed with a proposal to add a new Center to address underserved regions or populations. The Network will first rely on its methodology to determine where additional funds should be applied within existing regions once all Centers achieve the base funding threshold.

#### *Base Fund Threshold*

The current base funding threshold was derived from work done by the National Council on Independent Living (NCIL) and adjusted for inflation in FY23. Recognizing that the level of base funding needed to operate a regional Independent Living Center is not static, the Network will engage in an effort to analyze that amount during the three-year SPIL.

#### *Funding Distribution by the DSE*

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 landE, 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 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 review are provided to the ILC's executive director, board president, as well as the Wisconsin SILC and DSE.

The ILCs receive Part C 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 significant disabilities that promote full access to community life including geographic scope, determination of eligibility, and statewide reach.

#### Core Independent Living Services: Information and referral

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	Yes
Provided using other funds?	Yes
Provided By	CIL

#### Core Independent Living Services: IL skills training

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	Yes
Provided using other funds?	Yes
Provided By	CIL

#### Core Independent Living Services: Peer counseling

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	Yes
Provided using other funds?	Yes
Provided By	CIL

#### Core Independent Living Services: Individual and systems advocacy

Is this service being provided?	Yes
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Provided using Title VII, Chapter 1 Part B funds?	Yes
Provided using other funds?	Yes
Provided By	CIL

**Transition Services: Transition from nursing homes and other institutions**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	Yes
Provided using other funds?	Yes
Provided By	

**Transition Services: Diversion from institutions**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	Yes
Provided using other funds?	Yes
Provided By	CIL

**Transition Services: Transition of youth (who were eligible for an IEP) to post-secondary life**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	Yes
Provided using other funds?	Yes
Provided By	CIL

**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.**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Rehabilitation technology**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Mobility training**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Personal assistance services, including attendant care and the training of personnel providing such services**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Surveys, directories and other activities to identify appropriate housing, recreation opportunities, and accessible transportation and other support services**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Consumer information programs on rehabilitation and independent living 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**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Education and training necessary for living in the community and participating in community activities**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	Yes

Provided using other funds?	No
Provided By	CIL

**Transportation, including referral and assistance for such transportation and training in the use of public transportation vehicles and systems**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	Yes
Provided using other funds?	No
Provided By	CIL

**Individual and group social and recreational services**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	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**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Services for children**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	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**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Appropriate preventive services to decrease the need of individuals with disabilities for similar services in the future**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Community awareness programs to enhance the understanding and integration into society of individuals with disabilities**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

**Such other necessary services as may be necessary and not inconsistent with the Act**

Is this service being provided?	Yes
Provided using Title VII, Chapter 1 Part B funds?	No
Provided using other funds?	Yes
Provided By	CIL

## 2.1 - OPTIONAL MAP ATTACHMENT

Uploaded Document Name:

## 2.2 - OUTREACH TO UNSERVED AND UNDERSERVED POPULATIONS

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.

In Wisconsin, "served" means a person with a disability has received Information and Referral (landR) service and/or has a Consumer Information File (CIF). All 72 of Wisconsin's counties are served by an ILC. Each county has had at least one consumer receive IL services from their assigned ILC over the course of the previous SPIL. All eight ILCs have provided services to at least one person from a community that has historically been excluded or may be considered "minority population." WILN finds that no part of the State or any target population segment is "unserved," meaning in each county at least one landR 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 assesses 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.

There are many counties and historically excluded communities which are underserved and have had little contact with their respective Independent Living Center. Over the course of the 2021-2024 SPIL, Wisconsin's ILCs have worked hard to provide outreach to these communities. There have been some significant increases in the number of people they reach in counties which have historically been severely underserved. Furthermore, the ILC's Equity, Diversity, and Inclusion road map is serving to help WILN better understand the nuances of reaching communities which have been excluded and have historically felt unwelcome in the IL movement.

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:

- Establish culturally relevant communication systems, including written and oral communications to inform underserved communities about the Independent Living Movement.
- 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.
- Increase youth outreach efforts through Wisconsin Community on Transition (WiCoT) structure and internal center efforts

## 2.3 - COORDINATION

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

Plans for coordination of services and cooperation between 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, ILCs, and the DSE coordinate trainings, when feasible, on topics 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 relationship with Bureau of Aging and Disability Resources (BADR)*

BADR houses oversight agencies for both the IL network, and the Aging and Disability Resource Centers (ADRCs). This presents a significant opportunity for partnerships to achieve the goals set forth by ACL. WILN will work with BADR beyond their responsibilities as the DSE to expand partnerships and opportunities to better align service delivery and advocacy efforts. WCILC will develop a leadership role within the newly developed Aging Disability and Independent Living Network to ensure that ILCs and the SILC will be more included in statewide efforts.

WILN will work to develop strategic partnerships with the Office for the Blind and Visually Impaired (BVI) and Office of Deaf and Hard of Hearing (ODHH) to address the underserved populations of BVI and ODHH.

WILN will develop mechanisms for information sharing with the broader statutory committees.

WILN members serve 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.
- Wisconsin County Community on Transition (WiCoT) and County Communities on Transition (CCOT) - Center staff participate in local CCOT meetings, and ILC has an appointed spot in the WiCoT Council on Transition.
- Other Office for the Promotion of Independent Living (OPIL) Statutory Councils and Committees:
  - Statewide Assistive Technology Advisory Council - ILC Representative participates and attends quarterly meetings.
  - Wisconsin Statutory Council on the Blindness.
  - Wisconsin Council on the Deaf and Hard of Hearing.
  - Council on Physical Disabilities.
  - 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 and 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 has a board member (an ILC Director) who is a NCIL Board Member, leads the CIL Capacity-Building Committee, and co-chairs the Advocacy and Public Policy Committee, in addition to attending board meetings. Furthermore, A majority of the ILCs and the Wisconsin SILC are NCIL members.
- Association of Rural Programs for Independent Living (APRIL) - The majority of Wisconsin ILCs as APRIL members, WILN has a representative on the APRIL board, and a representative on the APRIL Advocacy Committee.
- National Association of Statewide Independent Living Councils (NASILC) - Wisconsin SILC Staff is Region V Representative.

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 with members from ILCs, WCILC, and Wisconsin SILC, and will expand to include ILC board members and consumers over the course of the 2025-2027 SPIL, who 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. The network will communicate their opinion on which local committees will best support state and national issues, to best align efforts at all three levels. WILN has representation on over forty-five state and national disability committees.

ILC staff will start participating in Statewide Committees as representatives of the IL network to better utilize areas of staff expertise.

## 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, and oversight entity.

### 3.1 - EXISTING CENTERS

Access to Independence, Inc.

Counties Served: Columbia, Dane, Dodge, Green

All Sources of Funding:

Title VII Chapter 1, Part B

Oversight Process: Part B Funds are overseen by the DSE. ILCs receive a grant continuation packet on a Federal Fiscal Year basis. ILCs complete budget requests and submit to the DSE. The DSE reviews allowable costs and approves the budgets. Contracts are issued for these funds to each ILC. ILCs submit copies of the annual Program Performance Reports to the DSE, Wisconsin SILC, and ACL. In addition, ILCs report quarterly program data and year-to-date budget spending by funding source. ILCs also submit their annual financial audits to the DSE.

Title VII Chapter 1, Part C

Oversight Process: Part C funds are overseen ACL.

State Funds

Oversight Process: General Purpose Revenue, and 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 a grant continuation packet on a State Fiscal Year basis. ILCs complete budget requests and submit to the DSE. The DSE reviews allowable costs and approves the budgets. Contracts are issued for these funds to each ILC. Each ILC completes a 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 the DSE, Wisconsin SILC, and ACL. In addition, ILCs report quarterly program data and year-to-date budget spending by funding source. ILCs also submit their annual financial audits to the DSE.

Oversight Entity: DSE, DSE and ACL/OILP, ACL/OILP

SPIL Signatory: Yes

County Services

Columbia (Full Services)

Dane (Full Services)

Dodge (Full Services)

Green (Full Services)

Center for Independent Living for Western Wisconsin

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

All Sources of Funding:

Title VII Chapter 1, Part B

Oversight Process: Part B Funds are overseen by the DSE. ILCs receive a grant continuation packet on a Federal Fiscal Year basis. ILCs complete budget requests and submit to the DSE. The DSE reviews allowable costs and approves the budgets. Contracts are issued for these funds to each ILC. ILCs submit copies of the annual Program Performance Reports to the DSE, Wisconsin SILC, and ACL. In addition, ILCs report quarterly program data and year-to-date budget spending by funding source. ILCs also submit their annual financial audits to the DSE.

Title VII Chapter 1, Part C

Oversight Process: Part C funds are overseen ACL.

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Oversight Entity: DSE, DSE and ACL/OILP, ACL/OILP

SPIL Signatory: Yes

### County Services

Barron (Full Services)

Chippewa (Full Services)

Clark (Full Services)

Dunn (Full Services)

Eau Claire (Full Services)

Pepin (Full Services)

Pierce (Full Services)

Polk (Full Services)

Rusk (Full Services)

St. Croix (Full Services)

### Independence First

Counties Served: Milwaukee, Ozaukee, Washington, Waukesha

All Sources of Funding:

Title VII Chapter 1, Part B

Oversight Process: Part B Funds are overseen by the DSE. ILCs receive a grant continuation packet on a Federal Fiscal Year basis. ILCs complete budget requests and submit to the DSE. The DSE reviews allowable costs and approves the budgets. Contracts are issued for these funds to each ILC. ILCs submit copies of the annual Program Performance Reports to the DSE, Wisconsin SILC, and ACL. In addition, ILCs report quarterly program data and year-to-date budget spending by funding source. ILCs also submit their annual financial audits to the DSE.

Title VII Chapter 1, Part C

Oversight Process: Part C funds are overseen ACL.

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Oversight Entity: DSE, DSE and ACL/OILP, ACL/OILP

SPIL Signatory: Yes

## County Services

Milwaukee (Full Services)

Ozaukee (Full Services)

Washington (Full Services)

Waukesha (Full Services)

Independent Living Resources, Inc.

Counties Served: Buffalo, Crawford, Grant, Iowa, Jackson, Juneau, La Crosse, Lafayette, Monroe, Richland, Sauk, Trempealeau, Vernon

All Sources of Funding:

Title VII Chapter 1, Part B

Oversight Process: Oversight Process: Part B Funds are overseen by the DSE. ILCs receive a grant continuation packet on a Federal Fiscal Year basis. ILCs complete budget requests and submit to the DSE. The DSE reviews allowable costs and approves the budgets. Contracts are issued for these funds to each ILC. ILCs submit copies of the annual Program Performance Reports to the DSE, Wisconsin SILC, and ACL. In addition, ILCs report quarterly program data and year-to-date budget spending by funding source. ILCs also submit their annual financial audits to the DSE.

Title VII Chapter 1, Part C

Oversight Process: Oversight Process: Part C funds are overseen ACL

## State Funds

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Oversight Entity: DSE, DSE and ACL/OILP, ACL/OILP

SPIIL Signatory: Yes

County Services

Buffalo (Full Services)

Crawford (Full Services)

Grant (Full Services)

Iowa (Full Services)

Jackson (Full Services)

Juneau (Full Services)

La Crosse (Full Services)

Lafayette (Full Services)

Monroe (Full Services)

Richland (Full Services)

Sauk (Full Services)

Trempealeau (Full Services)

Vernon (Full Services)

Midstate Independent Living Choices

Counties Served: Adams, Florence, Forest, Langlade, Marathon, Oneida, Portage, Taylor

All Sources of Funding:

Title VII Chapter 1, Part B

Oversight Process: Part B Funds are overseen by the DSE. ILCs receive a grant continuation packet on a Federal Fiscal Year basis. ILCs complete budget requests and submit to the DSE. The DSE reviews allowable costs and approves the budgets. Contracts are issued for these funds to each ILC. ILCs submit copies of the annual Program Performance Reports to the DSE, Wisconsin SILC, and ACL. In addition, ILCs report quarterly program data and year-to-date budget spending by funding source. ILCs also submit their annual financial audits to the DSE.

Title VII Chapter 1, Part C

Oversight Process: Part C funds are overseen ACL.

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Oversight Entity: DSE, DSE and ACL/OILP, ACL/OILP

SPIL Signatory: Yes

County Services

Adams (Full Services)

Florence (Full Services)

Forest (Full Services)

Langlade (Full Services)

Marathon (Full Services)

Oneida (Full Services)

Portage (Full Services)

Taylor (Limited Services)

North Country Independent Living

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

All Sources of Funding:

Title VII Chapter 1, Part B

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Title VII Chapter 1, Part C

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Oversight Entity: DSE, DSE and ACL/OILP, ACL/OILP

SPIL Signatory: Yes

County Services

Ashland (Full Services)

Bayfield (Full Services)

Burnett (Full Services)

Douglas (Full Services)

Iron (Full Services)

Price (Full Services)

Sawyer (Full Services)

Washburn (Full Services)

Options for Independent Living Inc.

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

All Sources of Funding:

Title VII Chapter 1, Part B

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Oversight Entity: DSE, DSE and ACL/OILP, ACL/OILP

SPIL Signatory: Yes

County Services

Brown (Full Services)

Calumet (Full Services)

Door (Full Services)

Fond du Lac (Full Services)

Green Lake (Full Services)

Kewaunee (Full Services)

Manitowoc (Full Services)

Marinette (Full Services)

Marquette (Full Services)

Menominee (Full Services)

Oconto (Full Services)

Outagamie (Full Services)

Shawano (Full Services)

Sheboygan (Full Services)

Waupaca (Full Services)

Waushara (Full Services)

Winnebago (Full Services)

Societys Assets, Inc.

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

All Sources of Funding:

Title VII Chapter 1, Part B

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## Title VII Chapter 1, Part C

Oversight Process: Part C funds are overseen ACL.

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Oversight Entity: DSE, DSE and ACL/OILP, ACL/OILP

SPIL Signatory: Yes

### County Services

Jefferson (Full Services)

Kenosha (Full Services)

Racine (Full Services)

Rock (Full Services)

Walworth (Full Services)

## 3.1 - EXISTING CENTERS

### **CIL Network**

Explain the criteria for defining the CIL network, bearing in mind that those CILs included in the network should be those eligible to sign the SPIL.

## 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 the statewide reach of the Network. (Follow the instructions in Title VII, Part C of the Rehabilitation Act of 1973, as amended.)

Definition of served, unserved, and underserved.

WILN finds that no part of the State or any target population segment is "unserved," meaning in each county at least one landR 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 assesses 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.

There are many counties and historically excluded communities which are underserved and have had little contact with their respective Independent Living Center. Over the course of the 2021-2024 SPIL, Wisconsin's ILCs have worked hard to provide outreach to these communities. There have been some significant increases in the number of people they reach in counties which have historically been severely underserved. Furthermore, the ILC's Equity, Diversity, and Inclusion road map is serving to help WILN better understand the nuances of reaching communities which have been excluded and have historically felt unwelcome in the IL movement.

The Network makes clear its plan and priorities for use of funds, as described in the Financial Plan section of this SPIL. These priorities and plans will assist in addressing underserved areas and populations in Wisconsin.

To best identify and prioritize underserved populations and areas of the state, the Network has engaged in crafting a formula, using data provided by the Department of Health Services Demographer, and a statistician from the Department of Administration. The product of that effort will yield data sets that will then be decided on by the ILC directors. Once those data sets are determined, and potentially weighted for equity, they will be used to create a formula that will identify and prioritize underserved populations and areas of the state.

Minimum funding level for a Center and formula/plan for distribution of funds to ensure that each Center receives at least the minimum.

By 1994, Wisconsin committed to providing 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. However, these funds, and additional funds appropriated since then, have never been sufficient for each ILC to adequately serve people with disabilities, and potential consumers of services, in each region of the state. That is why the Network has a minimum "base funding" threshold that each ILC in the state needs to achieve.

In recent years, there have been changes in ILC operating funds, and one-time increases, which have not improved the ability of most ILCs to maintain their current level of IL services, and furthered funding inequity among the states eight ILCs. 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 believes in keeping the values of funding equity among the ILCs and believes that clarity is needed to ensure equity is achieved and remains.

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

A strong statewide network ensures access to IL services for people of all disabilities, and any age. Adherence to funding equity principles, and a clearly defined process, keeps the network strong. The fundamental aspect of funding equity among Wisconsin's ILCs is that no Center substantially benefits more than other Centers, or is more harmed than other Centers, by changes in base funding amounts. To ensure commitment to this equity principle, WILN will incorporate the following methodology regarding changes in base funds.

All ILCs in the Network receive contracts for each of the sources of base funding. However, three Centers in the network receive a much larger Part C award due to how the federal funding formula was determined at the time the Center received its first federal award. With the full support of the entire Network, including the DSE, the five Centers with substantially smaller Part C awards receive a larger portion of GPR and SSA funding in an effort to bring equity in base funding to all eight ILCs.

What stifles base funding equity is that there is no current opportunity to reallocate Part C awards. As a result, the Network will rely on any changes made to SSA and GPR funds to address inequity.

*Supporting ILCs to reach a base funding threshold of \$626,400.*

Increases in base funding must be directed to support all eight ILCs to reach a base funding threshold of \$626,400. Until all eight ILCs achieve that threshold, increases in base funding will not be utilized in any other manner. The purpose of defining a base funding threshold, and ensuring all eight ILCs reach it, is because that is the minimum amount of base funding needed for any ILC in the state of Wisconsin to adequately serve its multi-county region.

### **Base Fund Threshold**

The current base funding threshold was derived from work done by the National Council on Independent Living (NCIL) and adjusted for inflation in FY23. Recognizing that the level of base funding needed to operate a regional Independent Living Center is not static, the Network will engage in an effort to analyze that amount during the three-year SPIL.

### **Funding Distribution by the DSE**

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 landE, 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 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 review are provided to the ILC's executive director and board president.

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

Priorities for establishment of new CIL(s).

The plans described in this section make clear that the Network will restrict new funds from being used to create a new Center when that may endanger funding to the existing ILCs, 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, and the majority of Center directors have agreed with a proposal to add a new Center to address underserved regions or populations. The Network will first rely on its methodology to determine where additional funds should be applied within existing regions once all Centers achieve the base funding threshold.

Action/process for distribution of funds relinquished or removed from a Center and/or if a Center closes.

In the event that an ILC 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 that ACL allow Wisconsin to retain the Part C funds for that specific service area, and the state's network of Independent Living Centers would ask for a Request for Proposals for the service area to be served by a new ILC as defined in Wisconsin State Statute 46.96(2).

An existing ILC, whose region is adjacent to the unserved region, may be granted available Part C funds to provide IL services in that unserved region until a new ILC is awarded those Part C funds.

Existing ILCs may not propose absorbing all or part of the unserved area. Changes in service areas shall not occur through this process.

Plan to build capacity of existing CILs and/or expand statewide reach by establishing branch offices and/or satellites of existing CILs.

When the current eight ILCs are able to expand their capacity to serve more people with disabilities, those ILCs can use state and federal IL funds in a manner they have determined to be effective. Such examples may include establish more locations such as branch offices; or rely on technology for virtual or digital service delivery, when appropriate. The goal for each ILC is to meet the needs of people with disabilities more efficiently in their geographic regions. Each ILC will also rely on the technical assistance provided through the state coalition to find best practices for effective and efficient program and service delivery.

Plan/formula for distribution of new funds (Part B, Part C, one-time funds, etc.)

The Wisconsin Independent Living Network will use the following methodology when there are increases in the following sources of base funding:

- Increases in Part C funds will not result in a change in SSA or GPR funds for a particular Center unless that Center has reached the base funding threshold of \$626,400.
- When an ILC has reached base funding of \$626,400, any available state funds that result in the Center being above the base funding threshold would be redistributed to the remaining Centers that are below the base funding threshold.
- No ILC will have their total state awards reduced to less than \$10,000.

- Increased state GPR or SSA funds will be directed toward the five Centers that receive significantly smaller Part C awards until they have reached the average total in base funds (in that FFY) that the three Centers that have significantly higher Part C awards receive.
- If the five ILCs that have smaller Part C awards reach the same average total in base funds as the three ILCs that have significantly higher part C awards, and there are additional state funds greater than that average amount, the remaining new state funds will be allocated evenly amongst all eight ILCs until they are all at the base funding threshold.
- If a state funding increase is significant enough, funds should be allocated to bring all eight ILCs up to the base funding threshold defined in this SPIL. Any remaining state funding would be allocated in the manner described below:

*Addressing underserved populations or geographic regions, once all ILCs reach the base funding threshold.*

Once all eight ILCs have reached the defined base funding threshold, any additional state funds will be directed toward addressing underserved populations or areas of the state.

To best determine where these funds should be directed, the Network has engaged in crafting a formula using data and methodology provided by the Department of Health Services Demographer and statistician from the Department of Administration. The product of that effort will yield data sets that will then be agreed upon by the ILC directors. Once those data sets are determined, and potentially weighted for equity, they will be used to create a formula that will identify which ILC would receive the extra funds to address those needs.

The formula will not be used as a way to allocate all GPR and SSA funds directed to the network of Centers.

If there are additional GPR and/or SSA funds to distribute, and a methodology has not been yet agreed upon, the funds will be evenly distributed among the eight ILCs, provided they have all reached the base funding threshold.

### **Reallocation of Part C Funds**

The only opportunity to reallocate Part C funds would come if state IL funding (SSA and GPR) funds exceeded the total federal Part B and Part C awards for the state. If that occurred, the ILCs would consider making a request to ACL to become a "723 State", which if approved, would cease all direct-funding to the Centers in Wisconsin. All Part B and Part C funds would be distributed in a manner as decided by the network and described in the SPIL. Such a request to become a 723 State requires the approval of no less than two-thirds of ILC directors.

### **Non-Base Funding Adjustments**

When new non-base funds are made available to the Centers, the methodology described above does not apply.

Plan/formula for adjusting distribution of funds when cut/reduced.

Funding equity is not just relevant for base funding increases, and funding decreases can be more consequential. Here are the ways in which adjustments to the allocation of SSA and GPR funds would be made in response to base funding decreases:

If some or all ILCs are below the base funding threshold:

- If Part C funds are decreased enough to cause the three Centers with significantly higher Part C awards to have a total base funding below the average of the other five Centers, then state

GPR and SSA funds will be reallocated to keep all eight base funding amounts equitable, to the greatest extent possible.

- If SSA or GPR funds are decreased, the three ILCs with the largest Part C awards would have their GPR and SSA awards reduced (by an equal amount) first, until they were at the minimum amounts possible, and any remaining reductions would be split evenly between the other five ILCs.

If all ILCs are at or above the base funding threshold:

- GPR or SSA funds should be reallocated to the greatest extent possible to keep all ILCs equitable in base funds in the event that Part C, GPR, or SSA awards are decreased.

Plan for changes to Center service areas and/or funding levels to accommodate expansion and/or adjustment of the Network. State the needed change(s) as concretely and succinctly as possible.

No changes needed.

Temporary Changes (if applicable) Other (if applicable)

## Section 4: Designated State Entity

### 4.0 - DESIGNATED STATE ENTITY

Department of Health Services 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.

### 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 - ADMINISTRATION AND STAFFING: DSE ASSURANCES

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.

## 4.3 - STATE-IMPOSED REQUIREMENTS

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

- State law, regulation, rule, or policy relating to the DSE's administration, funding, or operation of IL programs and/or establishment, funding, and operations of the SILC
- 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 landE 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 must 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 require 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 on 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, expand, or alter requirements for the SPIL or place additional restrictions on SILC autonomy, duties, responsibilities, and authorities.

## 4.4 - GRANT PROCESS and DISTRIBUTION OF FUNDS

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

Instructions: Describe the processes, policies, and procedures to be followed by the DSE in the awarding of grants of Part B funds including: (all of the following are required)

#### Process for soliciting proposals

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 landE, 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 DSE is mandated by ACL to complete an onsite ILC Compliance and Outcomes Monitoring Program (COMP) review every 3 years. OILP uses a three-tier system to evaluate and monitor ILCs. Tier 1 includes a ILC dashboard completed over the course of the fiscal year. Tier 2 reviews focus on specific program(s) or fiscal issues. Tier 3 are comprehensive program and fiscal reviews. The COMP provides transparency and consistency in the oversight of ILCs, helps identify training, and technical assistance needs across the network. The DSE relies on the COMP to provide consistent federal oversight of ILCs. ILCs may use the COMP to understand program and fiscal requirements and to conduct self-evaluations.

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

#### Development of format for proposals

When new federal or state awards are made which impact the SPIL Financial Plan and are specific to Part B, Part B state match, landE, 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 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.

Process for reviewing proposals and who reviewers will be

Process for evaluating performance and compliance of grantees

## 4.5 - 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. The DSE is mandated by ACL to complete an onsite ILC Compliance and Outcomes Monitoring Program (COMP) review every 3 years. OILP uses a three-tier system to evaluate and monitor ILCs. Tier 1 includes a ILC dashboard completed over the course of the fiscal year. Tier 2 reviews focus on specific program(s) or fiscal issues. Tier 3 are comprehensive program and fiscal reviews. The COMP provides transparency and consistency in the oversight of ILCs, helps identify training, and technical assistance needs across the network. The DSE relies on the COMP to provide

consistent federal oversight of ILCs. ILCs may use the COMP to understand program and fiscal requirements and to conduct self-evaluations.

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.

## 4.6 - 722 VS. 723 STATE

722 State

# 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.) Wisconsin SILC is also allocated landE funds (\$60,000.) Wisconsin SILC's total budget is [highlight.] \$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 votes to approve the budget. At all Wisconsin SILC meetings the full SILC receives monthly financial statements, as well as a review of the budget compared to Wisconsin SILC's 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. Controls include review of each month's bank statements by the SILC Treasurer, check signing limitations, Electronic Funds Transfer (EFT) approval and oversight by SILC Staff, SILC Chair, and SILC Treasurer, 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.

Funding sources may include "Innovation and Expansion (landE) funds authorized by 29 U.S.C. 721(a)(18); Independent Living Part B funds; State matching funds; [state allotments of Vocational Rehabilitation funding;] other public funds (such as Social Security reimbursement funds); and private sources."

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 \$80,000 of Innovation and Expansion (landE) funds from DVR and \$81,783 in Part B funds (30% of the state's Part B allocation) due to a one time increase of landE Funding in Federal Fiscal Year 2025. In other years, the Resource Plan includes \$60,000 of Innovation and Expansion (landE) funds from DVR and \$101,783 in Part B funds (30% of the state's Part B allocation) when the one-time landE finding increase is not available.

The Wisconsin SILC utilizes its Resource Plan funding to carry out operations of the Wisconsin SILC as directed by its Chair and members. The Wisconsin SILC is meeting its staffing obligations through a full-time Executive Director and the use of a contracted bookkeeper. Funding from the Resource Plan is being utilized to fund the SILC Staff and contracted bookkeeper in FFY 2025 - 2027. 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. The MOA outlines specific administrative duties the DSE may undertake and addresses potential conflicts of interest.

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 used to develop the Resource Plan.

To develop the Resource Plan, the Wisconsin SILC Staff and Treasurer analyze the annual, actual costs of maintaining and operating the Wisconsin SILC. After determining whether the financial resources provided are sufficient, a Resource Plan is drafted based on the previous years allocations with any changes and/or updates that may be necessary. The draft Resource Plan is reviewed by the Wisconsin SILC's Certified Public Accountant for accuracy and appropriateness.

The draft Resource Plan is then presented to the full SILC for approval. Following approval, if necessary, 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, after consulting with the DSE, will develop a plan to address any 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 of funds to facilitate effective operations of SILC.

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 Part A, Part B funds, Part B Carryover Funds (when applicable), 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 a 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 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.

Justification if more than 30% of the Part B appropriation is to be used for the SILC Resource Plan.

Wisconsin SILC does not use more than 30% of the Part B appropriation in their resource plan.

### 5.3 - MAINTENANCE OF SILC

How State will maintain the SILC over the course of the SPIL.

Instructions: Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b). Indicate who appoints members to the SILC, how the State ensures that the SILC composition and qualification requirements are met, how the chair is selected, how term limits are maintained, and how SILC vacancies are filled. Describe how the specific SILC-staffing requirements listed in the SPIL Instrument will be addressed. Concisely describe or cite relevant written policies, procedures, by-laws, technical assistance, and monitoring activities, or other practices.

Describe how the State will ensure that: (all of the following are required)

The SILC is established and operating

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.

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.

Appointments are made in a timely manner to keep the SILC in compliance with the Act

The following process is followed as outlined in the ILCW's Bylaws:

An individual interested in serving on the Council must contact the Chairperson, member of the Membership Committee, or staff person. The Chairperson will be informed of the individual's interest in the council within one day.

Within two weeks, the applicant will be interviewed by the Chairperson or their designee. During the interview, the applicant will be invited to the next ILCW Membership Committee meeting that is possible for them to attend.

During the interview, the applicant will also be asked to apply for Council membership 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 Chairperson.

At least one day prior to the Membership Committee meeting, notice of an applicant's interest to join the Council will be provided to the full council. Council members (both voting and ex-officio) will be invited to the committee meeting to meet the applicant.

At the Membership Committee meeting, the applicants will introduce themselves and answer questions from Council members in attendance. The applicant will be asked to leave the meeting following the interview to allow the council to discuss and vote on a recommendation for appointment to the Governor's Office of Appointments.

The Chairperson, or their designee, will inform the applicant of the result of the vote within one day of the Membership Committee meeting.

Within one day of informing the applicant of the result of the vote, the Chairperson 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 Council or to deny appointment for any given reason. The Governor's office then sends the Oath of Office to the new Council member and the appointment paperwork to the Chairperson or their designee.

#### *Appointment Authority*

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

The Governor's office notifies the DSE if there are vacancies on the Wisconsin SILC and if applicants are in queue 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 SILC is organized in a way to ensure it is not part of any state agency

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 SILC has the autonomy necessary to fulfill its duties and authorities, including “[working] with CILs to coordinate services with public and private entities, . . . conducting resource development, and performing such other functions . . . as the [SILC] determines to be appropriate

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

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. Controls include review of each month's bank statements by the SILC Treasurer, check signing limitations, Electronic Funds Transfer (EFT) approval and oversight by SILC Staff, SILC Chair, and SILC Treasurer, an annual independent financial audit, monthly grant claims, and quarterly program and budget reports submitted to the DSE.

Necessary and sufficient resources are provided for the SILC Resource Plan to ensure the SILC has the capacity to fulfill its statutory duties and authorities

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

The state entity/agency designated to receive and distribute funding, as directed by the SPIL, under Title VII, Part B of the Act is Department of Health Services.

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, Inc.

Center for Independent Living for Western Wisconsin

Independence First

Independent Living Resources, Inc.

Midstate Independent Living Choices

North Country Independent Living

Options for Independent Living Inc.

Societys Assets, Inc.

### 6.4.A

The SILC is authorized to submit the SPIL to the Independent Living Administration, Administration for Community Living.

Yes

### 6.4.B

The SILC and CILs may legally carryout each provision of the SPIL.

Yes

### 6.4.C

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

Yes

## Section 7: DSE Assurances

### DSE ASSURANCES

Carrie Molke acting on behalf of the DSE Department of Health Services located at:

Street: 1 W. Wilson Street, Room 551

City: Madison

State: WI

Zip Code: 53714

## 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;

## 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 SILCs 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 SILCs 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).

## DSE SIGNATURE SECTION

Carrie Molke

Name of DSE Director/Authorized Representative

Title of DSE Director/Authorized Representative

Electronic Signature

Date

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

## 8.1 - SILC ASSURANCES

Jason Endres acting on behalf of the SILC Independent Living Council of Wisconsin located at:

Street: 3810 Milwaukee St

City: Madison

State: WI

Zip Code: 53714

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;
3. The SILC terms of appointment adhere to the Act;
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.
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.

## 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 timelines for advance notice to the public of SILC meetings in compliance with State and federal law and 45 CFR 1329.15(a)(3);
    - 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;
    - ii. 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;
    - iii. Funds for innovation and expansion activities under Sec. 101(a)(18) of the Act, 29 U.S.C. Sec. 721(a)(18), as applicable;
    - iv. 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.

## SILC SIGNATURE SECTION

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

Jason Endres

Name of SILC Chair

Electronic Signature

Date

# Section 9: Signatures

## 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 10/01/2024

### SILC SIGNATURE SECTION

Name of SILC Chair
Electronic Signature
Date

### CIL SIGNATURE SECTION

Independent Living Resources, Inc.
Name of Center for Independent Living
Sara Eckland
Name of CIL Director
Electronic Signature
Date
Options for Independent Living Inc.
Name of Center for Independent Living
Josh Theis
Name of CIL Director
Electronic Signature

Date
Society's Assets, Inc Name of Center for Independent Living Karl Kopp Name of CIL Director  Electronic Signature  Date
North Country Independent Living Name of Center for Independent Living Jillian Nyberg Name of CIL Director  Electronic Signature  Date
Midstate Independent Living Choices Name of Center for Independent Living Don Wigington Name of CIL Director  Electronic Signature  Date
Access to Independence, Inc. Name of Center for Independent Living Jason Beloungy Name of CIL Director  Electronic Signature

Date
Independence First Name of Center for Independent Living Marci Boucher Name of CIL Director  Electronic Signature  Date
Center for Independent Living for Western Wisconsin Name of Center for Independent Living Kyle Kleist Name of CIL Director  Electronic Signature  Date