

**STATE PLAN FOR INDEPENDENT LIVING
(SPIL)**

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

SUBCHAPTER B - INDEPENDENT LIVING SERVICES

SUBCHAPTER C - Centers for Independent Living

State: IOWA

FISCAL YEARS: 2020 to 2023

Effective Date: October 1, 2020

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

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Executive Summary

The State Plan for Independent Living (SPIL) is a required plan in order for a state to receive federal Part C and federal Part B funding for Independent Living Services.

Title VII, chapter 1 of the Rehabilitation Act of 1973, as amended (the Act), establishes the Independent Living Services and Centers for Independent Living programs. The purpose is to:

- promote the independent living philosophy, based on consumer control, peer support, self-help, self-determination, equal access and individual and systems advocacy;
- maximize the leadership, empowerment, independence, and productivity of individuals with significant disabilities; and
- promote the integration and full inclusion of individuals with significant disabilities into the mainstream of American society.

The Iowa SPIL is the plan for how Iowa will strengthen the network of Centers for Independent Living, and the services and resources that are needed for all individuals with disabilities, to help them live independently and not be forced to live in institutions.

Iowa receives a very small portion of the federal Part C funds and federal Part B funds because these funds are disbursed based on state population. Iowa has a much smaller population than many of the other states and territories, thus receiving a much smaller portion of the federal funds. This makes it very challenging to find ways to strengthen the CILs and the services and supports that individuals with disabilities need to live independently.

The SILC and CILs conducted a Consumer and Public Input Survey in the Fall of 2019 to gather input on specific disability priorities from the disability community and the general public. The results of this survey were utilized to prioritize the goals of the Iowa SPIL.

This SPIL is a continuation of the previous SPIL, with a few modifications, as the CILs and SILC felt the goals, objectives, and activities of the previous SPIL were valuable ways for Iowa to strengthen the Independent Living Network, and the Consumer and Public Input Survey confirmed that these are still priorities for the disability community as well.

The SPIL has four goals which are geared to:

- Strengthening the IL Network as a whole, including collaboration with partners
- Strengthening Centers for Independent Living, including resource development
- Strengthening services and supports for Consumers through Systems Change Advocacy
- Providing outreach, including leadership and systems advocacy trainings for Consumers

The SPIL also outlines how any NEW federal or state funding is to be distributed to the partners in the Iowa Independent Living Network, which includes the six CILs, the Iowa Statewide Independent Living Council (SILC), Iowa Vocational Rehabilitation Services (IVRS), and Iowa Department for the Blind (IDB). Due to insufficient funding, the current six Iowa CILs are only able to serve 35 counties, with 30 of those counties being funded through a combination of Part C, Part B, and State funds, and five being funded through a combination of Part B funds and State funds. The CILs have all agreed to expand services into additional counties when adequate new funding becomes available.

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The CILs have developed a formula for the Adequate Level of Funding needed for each CIL, and have agreed that they do not want to start new CILs in Iowa, but rather have current CILs expand into unserved counties when adequate funding becomes available. There can be no expansion into additional counties until the current counties are adequately funded, or unless other funding sources are identified. The document does outline procedures for what happens to funding in the event a CIL would close, in the event a CIL would become ineligible for a funding stream, or in the event that one-time federal funding is received that is not ongoing funding.

The document also outlines the responsibilities of the State agency that is the Designated State Entity (DSE), which is Iowa Vocational Rehabilitation Services (IVRS). IVRS receives the federal Part B funds, and does contracts with the SILC and CILs for these funds and the State funds, and also provides oversight to ensure the funds expended are allowable expenses.

Section 1: Goals, Objectives and Activities

1.1 Mission:

Mission of the Independent Living Network and the SPIL.

Iowa Independent Living Network Mission

The Iowa Independent Living Network envisions an Iowa where ALL people with disabilities have equal opportunity to live, learn, work, and recreate in the communities they choose. All of our citizens, in all 99 counties, shall be able to access necessary benefits, supports, and resources. All citizens shall be recognized for their ABILITY to contribute in society.

DESCRIPTION OF THE IOWA INDEPENDENT LIVING NETWORK

The Iowa Independent Living Network is comprised of the current six Centers for Independent Living (CILs), the Iowa Statewide Independent Living Council (SILC), Iowa Vocational Rehabilitation Services (IVRS), and Iowa Department for the Blind (IDB). The CILs, IVRS, and IDB provide independent living services to Iowans with disabilities, regardless of type of disability, age, gender, race, or sexual orientation. The services provided assist Iowans with disabilities to live independently in the communities of their choice. The Iowa SILC partners with the CILs, IVRS, and IDB to help strengthen and expand the Iowa Independent Living Network, including the promotion of increased community-based services and resources for Iowans with disabilities. Iowa Vocational Rehabilitation Services (IVRS) is the Designated State Entity (DSE) for Iowa. The Iowa Department for the Blind (IDB) is NOT a Designated State Entity, but is part of the Iowa IL Network because they receive a portion of the federal Part B funds to provide independent living services statewide to individuals who have vision impairment or are blind. IDB also provides a portion of the Part B funds they receive, and a portion of the Title I Innovation and Expansion funds they receive, to the SILC to fund SILC operations.

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1.2 Goals:

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

GOALS OF IOWA'S INDEPENDENT LIVING NETWORK

Goal #1: STRENGTHENING THE IL NETWORK: Continue to strengthen collaboration and accountability among IL partners in Iowa.

Goal #2: RESOURCE DEVELOPMENT: The CILs and the SILC will conduct resource development activities that lead to strengthening the services provided by Iowa's IL Network.

Goal #3: SYSTEMS CHANGE ADVOCACY: The SILC Council and Staff and the CIL Staff, Boards, and Consumers will conduct Systems Change Advocacy that promotes independence for people with disabilities, consistent with Assurance 9 and OMB Circular A-122, Item 25 concerning lobbying.

Goal #4: OUTREACH EDUCATION: CILs and the SILC will work to develop and promote outreach education to people with disabilities, the general public, and others, and education on self-advocacy and leadership.

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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.

Geographic Scope of each Iowa IL Network Partner:

The six Iowa CILs serve the following 35 counties in Iowa. The bolded counties are where the CIL office(s) is located:

Legal Name	Counties Served
Disabilities Resource Center of Siouxland (DRCS-Sioux City)	<u>1 County Served with Part C Funds</u> Woodbury <u>2 Counties Served with Part B and State Funds</u> Cherokee, Plymouth
South Central Iowa Center for Independent Living (SCICIL-Oskaloosa)	<u>3 Counties Served with Part C Funds</u> Appanoose, Mahaska , Monroe <u>3 Counties Served with Part B and State Funds</u> Keokuk, Marion, Wappello
Illinois/Iowa Center for Independent Living (IICIL-Quad Cities)	<u>3 Counties Served with Part C Funds:</u> Clinton, Muscatine, Scott
Southwest Iowa Center for Independent Living (SWICIL-Council Bluffs)	<u>8 Counties Served with Part C Funds:</u> Cass, Fremont, Harrison, Mills, Montgomery, Page, Pottawattamie , Shelby
Central Iowa Center for Independent Living (CICIL-Des Moines)	<u>7 Counties Served with Part C Funds:</u> Boone, Dallas, Jasper, Madison, Polk , Story, Warren
Access 2 Independence of the Eastern Iowa Corridor (A2I-Iowa City)	<u>8 Counties Served with Part C Funds:</u> Benton, Cedar, Henry, Iowa, Johnson , Jones, Linn , Washington
TOTAL:	

The Iowa SILC is a statewide organization.

Iowa Vocational Rehabilitation Services (IVRS) and Iowa Department for the Blind (IDB) serve Consumers statewide in all 99 counties in Iowa.

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Iowa Independent Living Network 3 Year Strategic Plan * 10/1/2020 to 9/30/2023

<p>IDENTIFIED NEED: A strong network of CILs, the SILC, and other partners to provide independent living services and promote and support independent living and choice for all Iowans with disabilities. (SPIL Consumer Input Survey 2019: 89.61% rated Very Important/Somewhat More Important for Accountability, and 95.46% rated Very Important/Somewhat More Important for Collaboration.</p>		
<p>Goal #1 To MEET THE IDENTIFIED NEED: STRENGTHENING THE IL NETWORK: Continue to strengthen collaboration and accountability among IL partners in Iowa.</p>		
Objectives	Activities	Indicators of Achievement
<p>A. SILC ED/IVRS IL Staff/IDB Staff will develop relationships and ongoing collaboration with CIL staff and Boards.</p> <p>Geographic Scope: 6 Iowa CILs / 35 counties they serve.</p>	<p>A. The SILC and IVRS/IDB representatives attend one CIL Board Meeting at each CIL, at least once per CIL during this three-year SPIL period, to discuss the Iowa IL Network, current state and/or federal disability policy issues that are of concern, and receive an overview from the CIL Board and staff on CIL operations, including any promising practices they have and any technical assistance needs.</p>	<p>A. 100% of CILs participate in this collaborative meeting. CIL Board Members will be asked to complete a survey at the end of the meeting to determine if the information provided was helpful to them in their role as CIL Board Members. Results of the survey will be shared with the SILC Council and CIL Directors, and documented in the SILC/DSE/DSU annual PPR Report.</p>
<p>B. CILs and the SILC maintain fiscal and programmatic accountability through collaboration with IVRS.</p> <p>Geographic Scope: 6 Iowa CILs / 35 counties they serve, and the SILC which is statewide.</p>	<p>B1. IVRS conducts fiscal reviews of CILs through each GAX and expenditure documentation submitted, and conducts an on-site review once every 3 years. IVRS conducts fiscal reviews of the SILC monthly by reviewing the monthly GAX and expenditure documentation which the SILC submits to IVRS. IVRS conducts programmatic reviews quarterly by reviewing the programmatic reports submitted by the CILs and SILC.</p> <p>B2. IVRS will post CILs and SILC Annual PPR Reports on the IVRS website.</p>	<p>B1. 100% of CILs and the SILC have satisfactory reviews from IVRS showing they are fiscally and programmatic accountable. If problems are found, CILs and/or SILC will develop a corrective action plans, and IVRS will set a schedule for the corrective action plan to be completed, and will monitor successful completion of the corrective action plan.</p> <p>B2. 100% of Annual PPR Reports posted on IVRS website.</p>
<p>C. CILs and local IVRS offices develop collaboration.</p> <p>Geographic Scope: 6 Iowa CILs / 35 counties they serve, and IVRS offices serving those 35 counties.</p>	<p>C. CILs each develop and implement a plan on how they will collaborate with their local IVRS offices. CILs will provide a link to IVRS services on their website.</p>	<p>C. 100% of CILs document in their annual PPR Report the collaborative activities they have conducted with their local IVRS offices. Each CIL will have at least one collaborative activity annually and will report out on activities at December SILC Meetings.</p>
<p>D. CILs will collaborate with other organizations in their area on services and resources.</p> <p>Geographic Scope: 6 Iowa CILs / 35 counties they serve, and other agencies serving those 35 counties.</p>	<p>D. CILs develop and implement a collaboration plan with other organizations in their service area.</p>	<p>D. 100% of CILs document in their annual PPR Report the collaborative activities they have conducted with local organizations. Each CIL will have at least once collaborative activity annually, and will report out on activities at December SILC Meetings.</p>

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<p>IDENTIFIED NEED: Increased resources for the IL Network of CILs and the SILC to strengthen the services provided by this network to promote and support independence and choice for Iowans with disabilities. (SPIL Consumer Input Survey 2019: 86.19% rated Very Important/Somewhat More Important for CIL access and funding of CILs).</p>		
<p>Goal #2 To MEET THE IDENTIFIED NEED: RESOURCE DEVELOPMENT: The CILs and the SILC will conduct resource development activities that lead to strengthening the services provided by Iowa’s IL Network.</p>		
Objectives	Activities	Indicators of Achievement
<p>A. The SILC Council will annually determine resource development activities for the SILC as the Council determines to be needed and appropriate.</p> <p>Geographic Scope: Statewide</p>	<p>A. The SILC resource development activities include, but not limited to:</p> <ul style="list-style-type: none"> • Unrestricted funds resource development • Program income resource development • Grant writing for the SILC • Grant writing in collaboration with the CILs • Collaboration with CILs on other types of resource development • Providing collaboration and technical assistance to CILs at the CILs request 	<p>A. The SILC reports on accomplishments in their resource development activities at the December SILC Meeting, and also documents this in the annual PPR Report. Success of this objective is measured by increased resources for the SILC and/or CILs by September 30, 2023.</p>
<p>B. The CILs will annually determine resource development activities for their CIL as each CIL determines to be needed and appropriate.</p> <p>Geographic Scope: 6 Iowa CILs / 35 counties they serve</p>	<p>B. The CILs resource development activities include, but not limited to:</p> <ul style="list-style-type: none"> • Unrestricted funds resource development • Program income resource development • Grant writing • Collaboration with the SILC and/or other CILs on other types of resource development • Contracting with various state agencies and/or the MCOs to provide services 	<p>B. The CILs report on accomplishments in their resource development activities at the December SILC Meeting and in their annual PPR Report. Success of this objective is measured by increased resources for the CILs by September 30, 2023.</p>
<p>C. The CILs and SILC collaborate on resource development for increased State funding for CILs.</p> <p>Geographic Scope: 6 Iowa CILs / 35 counties they serve.</p>	<p>C. CILs and SILC develop and provide a report to educate the Legislators and the Governor on the accomplishments of CILs and the need for additional state funding for CILs.</p>	<p>C. Results of efforts for increased state funding for CILs will be reported by the SILC ED at the December SILC Meetings. Success of this objective is measured by increased state funding being appropriated for CILs by September 30, 2023.</p>
<p>D. The SILC and CILs collaborate on resource development for increased Federal funding for CILs and the SILC.</p> <p>Geographic Scope: 6 Iowa CILs / 35 counties they serve, and SILC statewide.</p>	<p>D. CIL Staff/Board/Consumers and SILC Staff/Council work with NCIL and other national advocacy groups to obtain increased federal funding for CILs and the SILC.</p>	<p>D. Results of efforts for increased federal funding for CILs and the SILC will be reported by the SILC ED at the SILC Meetings. Success of this objective is measured by increased federal funding being appropriated for CILs/SILC by September 30, 2023.</p>

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IDENTIFIED NEED: Systems Change Advocacy to promote and support independence and choice for Iowans with disabilities. (SPIL Consumer Input Survey 2019: Advocacy issues in order of highest ratings of Very Important/Somewhat More Important are Health Care (98.02%), Civil Rights (94.77%), Medicaid (94.08%), Education (93.46%), Employment (92.81%), Community and In-Home Support Services (92.10%), Housing (91.50%), Transportation (90.85%), Social Security (90.73%), and Family Support (75.32%).)

Goal #3 To MEET THE IDENTIFIED NEED: **SYSTEMS CHANGE ADVOCACY: The SILC Council and Staff and the CIL Staff, Boards, and Consumers will conduct Systems Change Advocacy that promotes independence for people with disabilities, consistent with Assurance 9 and OMB Circular A-122, Item 25 concerning lobbying.**

Objectives	Activities	Indicators of Achievement
<p>A. The SILC and CILs, both as individual organizations, as well as in collaboration with each other and/or other partners, will engage in systems change advocacy actions to promote independence for people with disabilities, in compliance with the Assurance 9 lobbying restrictions and OMB Circular A-122, Item 25.</p> <p>Geographic Scope: Statewide</p>	<p>A1. The SILC will develop and implement annual Systems Change Advocacy priorities and Action Plans as the Council determines to be appropriate, and consistent with Assurance 9 and OMB Circular A-122, Item 25 concerning lobbying.</p> <p>A2. The CILs will develop and implement annual Systems Change Advocacy priorities and Action Plans as each CIL determines to be appropriate, consistent with Assurance 9 and OMB Circular A-122, Item 25 concerning lobbying.</p> <p>A3. The SILC and CILs will conduct a survey in the 3rd year of this SPIL (2020-2023) of Iowa Consumers to identify the systems advocacy issues that Consumers feel are most important.</p> <p>A4. The SILC and CILs will collaborate with other groups, such as the Iowa Olmstead Consumer Task Force (OCTF), the Iowa Disability and Aging Advocates Network (IDAAN), NCIL, APRIL, NASILC and other groups and organizations to collaborate on systems change advocacy, consistent with Assurance 9 and OMB Circular A-122, Item 25 concerning lobbying.</p>	<p>A1. The annual SILC Systems Change Advocacy activities and results will be reported on at the December SILC Meeting by the SILC ED and included in the annual PPR Report to indicate impacts that systems change advocacy activities had on promoting independence for people with disabilities.</p> <p>A2. The annual CIL Systems Change Advocacy activities and results will be reported on by each CIL Director at the December SILC Meeting and included in the annual CIL's PPR Report to indicate impacts that systems change advocacy activities had on promoting independence for people with disabilities.</p> <p>A3. Results of the Consumer input survey will be shared with other partners, and will be used by the SILC and CILs when determining systems advocacy priorities as well as goals and objectives for the next 3-year SPIL.</p> <p>A4. The SILC ED and CIL Directors will report on collaborative systems change advocacy activities at the December SILC Meeting, and included these activities in the annual PPR Reports of each organization to indicate impacts that systems change advocacy activities had on promoting independence for people with disabilities.</p>

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<p>IDENTIFIED NEED: Outreach Education to promote and support independence and choice for Iowans with disabilities, including education on self-advocacy and leadership in the Iowa disability community. (SPIL Consumer Input Survey 2019: 90.79% rated Very Important/Somewhat More Important for Outreach).</p>		
<p>Goal #4 To MEET THE IDENTIFIED NEED: OUTREACH EDUCATION: CILs and the SILC will work to develop and promote outreach education to people with disabilities, the general public, and others, and education on leadership and self-advocacy.</p>		
Objectives	Activities	Indicators of Achievement
<p>A. The citizens of the state of Iowa will be better educated on IL history and philosophy, and leadership and systems change advocacy. This will include people with disabilities who are members of unserved and underserved populations, and include urban and rural populations and minority populations (African American, Asian, Latino, Native American, Pacific Islander).</p> <p>Geographic Scope: 6 Iowa CILs / 35 counties they serve, and IVRS statewide.</p>	<p>A. CILs and DSUs will all have an outreach plan, and will conduct the outreach activities in that plan.</p>	<p>A. CILs and DSUs outreach plans, and progress on the outreach activities, are documented in their annual PPR Reports.</p>
<p>B. The CILs and SILC will work to promote Leadership and Self-Advocacy within the disability community.</p> <p>Geographic Scope: Statewide.</p>	<p>B1. The CILs and SILC will work with other disability and aging organizations to provide information and training on Leadership and Self-Advocacy for people with disabilities. This may include partnering with other disability and aging organizations to do regional and/or statewide trainings for Consumers on self-advocacy and leadership development.</p> <p>Examples of various strategies which may be implemented include, but are not limited to, partnering with other organizations to provide speakers and travel expenses for Consumers to trainings; webinars; teleconferences.</p> <p>B2. The CILs and SILC will work with Consumers to assist them with developing a consumer-led statewide leadership and self-advocacy coalition. The coalition will be led by Consumers, and the goals and activities of this coalition will be determined by the Consumers.</p>	<p>B1. The SILC ED will report out at the December SILC meetings on the collaborative leadership and self-advocacy trainings and opportunities provided. Success of this will be documented by the increased numbers of Consumers involved in these trainings and other opportunities over the three-year SPIL period. This will also be documented in the annual SILC/DSE/DSU PPR Report.</p> <p>B2. Success of this will be measured by the development of a Consumer-led statewide leadership and self-advocacy coalition by September 30, 2023.</p>

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1.4 Evaluation

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

Timeline	Goals	Objectives	Data to be collected	Data collection method	Organization primarily responsible for data collection
Throughout 3-year period, evaluate annually	GOAL #1: <u>STRENGTHENING THE IL NETWORK:</u> Continue to strengthen collaboration and accountability among IL partners in Iowa.	1A. SILC ED/IVRS IL Staff/IDB Staff will develop relationships and ongoing collaboration with CIL staff and Boards.	-At least one meeting per CIL over 3-year SPIL period. -Results of survey of CIL Board Members	-Minutes of SILC Meeting reporting on CIL visits. -Survey results reported in SILC meetings.	<ul style="list-style-type: none"> ○ SILC ○ DSE
Throughout 3-year period, evaluate annually	Same as above	1B. CILs and the SILC maintain fiscal and programmatic accountability through collaboration with IVRS.	-CILs and SILC financial documentation and quarterly programmatic reports.	-CILs and SILC financial GAXs and documentation and quarterly programmatic reports submitted to and approved by IVRS.	<ul style="list-style-type: none"> ○ CILs ○ SILC ○ DSE
Throughout 3-year period, evaluate annually	Same as above	1C. CILs and local IVRS offices develop collaboration.	-Reports from CILs on number and types collaboration efforts.	-CILs written report out at December SILC meetings and in their annual PPR Report.	<ul style="list-style-type: none"> ○ CILs ○ DSE
Throughout 3-year period, evaluate annually	Same as above	1D. CILs and other organizations in their service area collaborate on services and resources.	-Reports from CILs on number and types of collaboration efforts.	-CILs written report out at December SILC meetings and in their annual PPR Report.	<ul style="list-style-type: none"> ○ CILs

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Timeline	Goals	Objectives	Data to be collected	Data collection method	Organization primarily responsible for data collection
Throughout 3-year period, evaluate annually	GOAL #2: RESOURCE DEVELOPMENT: The CILs and the SILC will conduct resource development activities that lead to strengthening the services provided by Iowa's IL Network.	2A: The SILC Council will annually determine resource development activities for the SILC as the Council determines to be needed and appropriate.	2A. Documentation of increased resources for the SILC and/or CILs by September 30, 2023.	2A. The SILC reports on accomplishments in their resource development activities at the December SILC Meetings, and also documents this in the annual PPR Report.	○ SILC
Throughout 3-year period, evaluate annually	Same as above.	2B. The CILs will annually determine resource development activities for their CIL as each CIL determines to be needed and appropriate.	2B. Documentation of CIL resource development activities and results annually. Success of this objective is measured by increased resources for the CILs by September 30, 2023.	2B. The CILs report on accomplishments in their resource development activities at the December SILC Meetings and in their annual PPR Report.	○ CILs
Throughout 3-year period, evaluate annually	Same as above.	2C. The CILs and SILC collaborate on resource development for increased State funding for CILs.	2C. Annual CIL Report to Legislators and SILC ED report out at December SILC meetings and in the annual PPR of the efforts and results for increased state funding for CILs Success is measured by increased state funding for CILs by September 30, 2023.	2C. Annual CIL Report to Legislators, and SILC ED report out at December SILC meetings and in SILC/DSE annual PPR Report.	○ CILs ○ SILC
Throughout 3-year period, evaluate annually	Same as above.	2D. The SILC and CILs collaborate on resource development for increased Federal funding for CILs and the SILC.	2D. Report from SILC ED at December SILC meetings on efforts and results for increased federal funding for CILs and the SILC. Success of this objective is measured by increased federal funding for CILs/ SILC by September 30, 2023.	2D. Documentation of increased federal funding received for CILs/SILC.	○ CILs ○ SILC

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Timeline	Goals	Objectives	Data to be collected	Data collection method	Organization primarily responsible for data collection
Throughout 3-year period, evaluate annually	<p>GOAL #3: <u>SYSTEMS CHANGE ADVOCACY</u>: The SILC Council and Staff and the CIL Staff, Boards, and Consumers will conduct Systems Change Advocacy that promotes independence for people with disabilities, consistent with Assurance 9 and OMB Circular A-122, Item 25 concerning lobbying.</p>	<p>3A. The SILC and CILs will engage in systems change advocacy actions to promote independence for people with disabilities.</p>	<p>3A1. A list of SILC system change advocacy actions and outcomes.</p> <p>3A2. A list of CIL’s system change advocacy actions and outcomes.</p> <p>3A3. Consumer survey data collected and compiled in (2022-2023), including data on satisfaction with the SPIL.</p> <p>3A4. A list of SILC and CILs collaborations with other groups and organizations on systems change advocacy and results of actions.</p>	<p>3A1. Written reports from the SILC presented annually at the December SILC meetings and in the SILC/DSE/ DSU PPR Report.</p> <p>3A2. Written reports from CILs presented annually at the December SILC meeting and in the CIL’s PPR Reports.</p> <p>3A3. Written results of survey will be presented at the September 2023 SILC meeting and in the SILC/DSE/ DSU PPR Report.</p> <p>3A4. Written reports from the SILC and CILs presented annually at the December SILC meetings and in the PPR Reports of these partners.</p>	<ul style="list-style-type: none"> ○ SILC ○ CILs ○ CILs ○ SILC ○ CILs ○ SILC

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Timeline	Goals	Objectives	Data to be collected	Data collection method	Organization primarily responsible for data collection
Throughout 3-year period, evaluate annually	GOAL #4: OUTREACH EDUCATION: CILs and the SILC will work to develop and promote outreach education to people with disabilities, the general public, and others, and education on leadership and self-advocacy.	4A. The citizens of the state of Iowa will be better educated on IL history and philosophy, and leadership and systems change advocacy.	4A. CILs and DSUs outreach activities and outcomes.	4A. CILs and DSUs will all have a written outreach plan, conduct the outreach activities in that plan, and report on activities and outcomes in their annual PPR Reports.	<ul style="list-style-type: none"> ○ CILs ○ DSE ○ DSU
Throughout 3-year period, evaluate annually	Same as above.	4B1. The CILs and SILC will work to promote Leadership and Self-Advocacy within the disability community. 4B2. Development of a consumer-led statewide leadership and self-advocacy coalition.	4B1. Numbers of information and training activities provided on Leadership and Self-Advocacy for people with disabilities 4B2. <ul style="list-style-type: none"> • # of Consumers involved in the planning of Coalition • # of planning meetings • # of coalition meetings • # of Consumers involved in coalition meetings • # of Consumers attending leadership trainings 	4B1. SILC and CILs will document numbers of information and training activities at the December SILC meetings and in their annual PPR Reports. 4B2. SILC will document the data in their annual PPR Report and will report out at the December SILC meetings.	<ul style="list-style-type: none"> ○ SILC ○ CILs ○ SILC ○ CILs

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1.5 Financial Plan

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

Fiscal Year(s): 2020-2021; 2021-2022; 2022-2023 (Same for all three SPIL years)						
Sources	Projected Funding Amounts and Uses					
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Administrative costs	Totals
Title VII Funds						
Chapter 1, Subchapter B	87,911	VR: B: 81,432 IDB: B: 59,130 TTL: \$140,562	110,244	-0-	-0-	\$338,717
Chapter 1, Subchapter C			973,814			\$973,814
Other Federal Funds						
Sec. 101(a)(18) of the Act (Innovation and Expansion)	45,000					\$45,000
Social Security Reimbursement	10,524					\$10,524
Other						
CARES Act			941,295			\$941,295
Non-Federal Funds						
State Funds		VR: Match: 84,823 IDB: Match: 7,533 Total: \$92,356	86,457			\$178,813
Other						
TOTALS:	\$143,435	VR: \$166,255 IDB: \$66,663 Total: 232,918	\$2,111,810	-0-	-0-	\$2,488,163

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Financial Plan Narrative

It should be noted that the Iowa Independent Living Network is significantly underfunded. The Network consists of the 6 Centers for Independent Living (CILs), the Iowa Statewide Independent Living Council (SILC), Iowa Vocational Rehabilitation Services (IVRS), and Iowa Department for the Blind (IDB). Due to the inadequate funding for Iowa independent living services, the six CILs are only able to serve 35 of Iowa's 99 counties, and some of those 35 counties are underserved as CILs do not have the funding to hire an adequate number of staff to serve all current counties fully. IVRS and IDB are both able to provide Independent Living Services in all 99 counties, but their funding is also very inadequate, so many of these counties are underserved and unserved. IVRS and IDB do coordinate with CILs to ensure there is no duplication of services.

The six Iowa CILs will use their federal Part C funds, federal Part B funds, and State funds to provide the five core IL services in their designated service areas. All six CILs have Part C funded counties and use all three of their major funding sources listed above to serve those counties. Two CILs have added a total of 5 additional counties that were previously unserved by CIL services, and that they serve using only their federal Part B funds and State funds. At times the CILs will conduct resource development activities, and may also enter into contracts with other entities to provide other services, with those resources and services being geared toward meeting needs they have identified for Consumers in their service areas.

The CIL's CARES Act funds will be used specifically for allowable activities to address needs that have arisen, and continue to arise, out of the COVID-19 pandemic, to Consumers within the counties in their Part C service areas. Please note that the CARES Act amounts listed in this document reflect the total amount of CARES Act funds which the CILs received in 2020. Some of these funds will be expended in 2020, and some of them will be expended in 2021. Per the CARES Act, all funds must be encumbered/expended by September 30, 2021.

The SILC will use their federal Part B funds, federal Title I Innovation and Expansion funds, and federal Social Security Reimbursement funds for the operation of the SILC. A portion of those funds will be used to support SPIL Goal #4, Objective B, to promote Leadership and Self-Advocacy within Iowa's disability community, such as providing funds for registration, travel, and hotel for Consumers to attend leadership trainings in Iowa, regionally, and at the national level. Other types of activities related to the SPIL that are funded out of the SILC budget include Consumer-led Consumer Leadership Team planning meetings (ZOOM and in-person when possible), as well as the Survey Monkey tool for doing Consumer and public input surveys.

IVRS and IDB will use their Part B and State funds to provide independent living services statewide, as much as their limited funds will allow. They will coordinate with the CILs to serve folks outside of CIL service areas, or to serve folks within a CIL service area when the CIL does not have the needed resources to serve that Consumer. In this way they can assure the best use of funds and avoid duplication of services.

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The following is a chart of each partner and the amount of each funding stream they receive.

Partner	**CARES Act Funds	Federal Part C Funds	Federal Part B Funds	State Funds	Title I Innovation/Expansion Funds	Social Security Reimbursement Funds	Totals
Disabilities Resource Center of Siouxland (DRCS-Sioux City)	**75,697	78,311	18,374	14,409.50	N/A	N/A	\$186,791.50
South Central Iowa Center for Independent Living (SCICIL-Oskaloosa)	**113,543	117,466	18,374	14,409.50	N/A	N/A	\$263,792.50
Illinois/Iowa Center for Independent Living (IICIL-Quad Cities)	**113,543	117,466	18,374	14,409.50	N/A	N/A	\$263,792.50
Southwest Iowa Center for Independent Living (SWICIL-Council Bluffs)	**165,414	171,129	18,374	14,409.50	N/A	N/A	\$369,326.50
Central Iowa Center for Independent Living (CICIL-Des Moines)	**227,087	234,932	18,374	14,409.50	N/A	N/A	\$494,802.50
Access 2 Independence of the Eastern Iowa Corridor (A2I-Iowa City)	**246,011	254,510	18,374	14,409.50	N/A	N/A	\$533,304.50
SILC	N/A	N/A	87,911	N/A	45,000	10,524	\$143,435.00
IVRS	N/A	N/A	81,432	84,823	N/A	N/A	\$166,255.00
IDB	N/A	N/A	59,130	7,533	N/A	N/A	\$66,663.00
TOTALS:	\$941,295	\$973,814	\$338,717	\$178,813	\$45,000	\$10,524	\$2,488,163

**NOTE: CARES Act funds listed are the TOTAL each CIL received in 2020. Some of this will be expended in 2020, and some will be expended in 2021.

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The federal Part C funds are distributed directly to CILs from the Administration on Community Living (ACL, the federal funder) through a draw-down process. All partners receive Part B funds (6 CILs, SILC, IVRS, and IDB). The funds come from ACL to IVRS, who is the Designated State Entity (DSE). IVRS provides IDB with their portion of the Part B funds as outlined in the SPIL, and does annual contracts with the SILC and the CILs. The amount of each contract stays the same each year as outlined in the SPIL, including any COLA increase being given to each partner based upon the percentage their Part B is to the total Part B allocation, again as per the SPIL. The SILC and CILs must each submit a monthly or quarterly GAX reimbursement request form, along with documentation for each expenditure being claimed. IVRS reviews the claims and documentation to ensure the expenditures are allowable and properly documented, and then provides reimbursement. IVRS provides the SILC with a Capital Advance each October. The amount of the Capital Advance is the total SILC budget, divided by 12 months, and multiplied by two months. This gives the SILC a 2-month up-front operating capital. At the end of the federal fiscal year, the amount of the Capital Advance is subtracted off the final one or two GAX reimbursement requests, in order to pay back the Capital Advance, and then a new Capital Advance is generated. When new Part B money is awarded, it is divided between all partners based upon the percent their Part B is to the total Part B, as directed by the SPIL. There are two streams of State funds. One stream is the state match for Part B funds that goes to IVRS and IDB. The other stream is State funds that go to the CILs for their operations. The funds go from the State to IVRS, and IVRS does contracts with the CILs for the State funding. All State funding is divided equally among all six CILs, including any new State funding, as directed by the SPIL.

CARES Act Funding Statement: Iowa CILs received a total of 941,295 in CARES Act funding. Below is a chart which outlines the CILs, the amount each received, and the counties that are part of their Part C service area where the CARES Act funds will be used. The CILs will use these funds for allowable services related to COVID-19 needs in the Part C funded counties they each serve, based upon what the needs are in each of their service areas.

Legal Name	Counties Served	Amount of CARES Act Funds Received
Disabilities Resource Center of Siouxland (DRCS-Sioux City)	<u>1 County Served with Part C Funds</u> Woodbury	75,697
South Central Iowa Center for Independent Living (SCICIL-Oskaloosa)	<u>3 Counties Served with Part C Funds</u> Appanoose, Mahaska, Monroe	113,543
Illinois/Iowa Center for Independent Living (IICIL-Quad Cities)	<u>3 Counties Served with Part C Funds:</u> Clinton, Muscatine, Scott	113,543
Southwest Iowa Center for Independent Living (SWICIL-Council Bluffs)	<u>8 Counties Served with Part C Funds:</u> Cass, Fremont, Harrison, Mills, Montgomery, Page, Pottawattamie, Shelby	165,414
Central Iowa Center for Independent Living (CICIL-Des Moines)	<u>7 Counties Served with Part C Funds:</u> Boone, Dallas, Jasper, Madison, Polk, Story, Warren	227,087
Access 2 Independence of the Eastern Iowa Corridor (A2I-Iowa City)	<u>8 Counties Served with Part C Funds:</u> Benton, Cedar, Henry, Iowa, Johnson, Jones, Linn, Washington	246,011
TOTAL:		\$941,295

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State Match for Part B Statement: Part B federal funds are \$338,717 plus the state match of \$92,356 which totals \$431,073. The required state match must be at least 10% of the total, or \$43,107. The actual state match of \$92,356 exceeds the required 10% match.

Section 2: Scope, Extent, and Arrangements of Services

2.1 Services

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

Table 2.1A: Independent living services	Provided using Subchapter B	Provided using other funds	Provided by
Core Independent Living Services, as follows:			
- Information and referral	X		CILs/DSE/DSU
- IL skills training	X		CILs/DSE/DSU
- Peer counseling	X		CILs/DSE/DSU
- Individual and systems advocacy	X		CILs/DSE/DSU
▪ Transition services including:			
▪ Transition from nursing homes & other institutions			
▪ Diversion from institutions			
▪ Transition of youth (who were eligible for an IEP) to post-secondary life			
Counseling services, including psychological, psychotherapeutic, and related services			
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 significant disabilities) Note: CILs are not allowed to own or operate housing.	X		CILs/DSE/DSU
Rehabilitation Technology	X		DSE/DSU
Mobility training	X		CILs/DSE/DSU
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	X		CILs/DSE/DSU
Personal assistance services, including attendant care and the training of personnel providing such services	X		CILs
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	X		CILs

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Table 2.1A: Independent living services	Provided using Subchapter B	Provided using other funds	Provided by
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act	X		CILs/DSE/DSU
Education and training necessary for living in the community and participating in community activities	X		CILs/DSE/DSU
Supported living			
Transportation, including referral and assistance for such transportation	X		CILs
Physical rehabilitation			
Therapeutic treatment			
Provision of needed prostheses and other appliances and devices			
Assistive Technology			
Individual and group social and recreational services	X		CILs
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	X		CILs/DSE/DSU
Services for children			
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 significant disabilities		X	CILs
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	X		CILs
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	X		CILs/DSE/DSU
Other necessary services not inconsistent with the Act	X		CILs

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2.2 Outreach

Identify steps to be taken regarding outreach to populations that are unserved or underserved by programs that are funded under Title VII, including minority groups and urban and rural populations.

The following populations are targeted for outreach:

- Iowans with significant disabilities who reside in one of the 64 counties in Iowa NOT served by CIL services. This would include both urban and rural populations as well as minority populations (African American, Asian, Latino, Native American, and Pacific Islanders).
- Iowans with significant disabilities who reside in one of the 29 counties served by CILs that are UNDERSERVED because Iowa CILs have inadequate funding to be able to hire additional staff to adequately serve the 29 counties that are outside of the six counties where their offices are located. This would include both urban and rural populations as well as minority populations (African American, Asian, Latino, Native American, and Pacific Islanders).

As stated above, the geographic communities in which the targeted populations reside include the 64 counties in Iowa NOT served by CIL services. These 64 unserved counties include: Adair, Adams, Allamakee, Audubon, Black Hawk, Bremer, Buchanan, Buena Vista, Butler, Calhoun, Carroll, Cerro Gordo, Chickasaw, Clarke, Clay, Clayton, Crawford, Davis, Decatur, Delaware, Des Moines, Dickinson, Dubuque, Emmet, Fayette, Floyd, Franklin, Greene, Grundy, Guthrie, Hamilton, Hancock, Hardin, Howard, Humboldt, Ida, Jackson, Jefferson, Kossuth, Lee, Louisa, Lucas, Lyon, Marshall, Mitchell, Monona, O'Brien, Osceola, Palo Alto, Pocahontas, Poweshiek, Ringgold, Sac, Sioux, Tama, Taylor, Union, Van Buren, Wayne, Webster, Winnebago, Winneshiek, Worth, and Wright.

The other geographic communities in which the targeted populations reside include the 29 counties in Iowa served by CILs that are UNDERSERVED because Iowa CILs have inadequate funding to be able to hire additional staff to adequately serve these 29 underserved counties that are outside of the six counties where their offices are located. The 29 underserved counties include Appanoose, Benton, Boone, Cass, Cedar, **Cherokee, Clinton, Dallas, Fremont, Harrison, Henry, Iowa, Jasper, Jones, **Keokuk, Linn, Madison, **Marion, Mills, Monroe, Montgomery, Muscatine, Page, **Plymouth, Shelby, Story, **Wapello, Warren, and Washington.

****NOTE:** The counties of Keokuk, Marion, and Wapello are served by the South Central Iowa Center for Independent Living (SCICIL) out of Oskaloosa, Iowa, and are served using federal Part B funds and State funds and NOT federal Part C funds. The counties of Cherokee and Plymouth are served by Disabilities Resource Center of Siouxland (DRCS) out of Sioux City, Iowa, and are served using federal Part B funds and State funds and NOT federal Part C funds.

Each CIL, the DSE, and the DSU have their own outreach plan as to how they will do outreach to these underserved and unserved populations, including both urban and rural populations as well as minority populations (African American, Asian, Latino, Native American, and Pacific Islanders).

The SILC makes efforts to reach out to all Iowans with disabilities across the state, including those in the target areas listed above, to engage them in applying to be considered for appointment to the SILC. The SILC is also making efforts to reach out to all Iowans with disabilities across the state, including those in

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the target areas listed above, to engage them in developing a statewide Consumer-led Leadership and Advocacy Coalition, as well as providing Leadership and Advocacy training opportunities, as part of Goal #4 of this SPIL.

The SILC and the CILs also partner with other disability and aging organizations, whenever possible, to collaborate on reaching out to these underserved and unserved populations. Due to the inadequate funding that Iowa receives for independent living, it is not possible to do any additional outreach activities at this time.

2.3 Coordination

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

Centers for Independent Living, IVRS, and IDB collaborate with each other as well as with a variety of agencies to provide services and resources for the consumer partners they serve, and work to ensure there is no duplication of services. Examples of collaborations include:

- Iowa Department of Education - Special Education
- Iowa Vocational Rehabilitation Services – VR Education
- Iowa Governor’s Developmental Disabilities Council
- Iowa Department of Public Health
- Iowa Department of Human Services - Mental Health & Disabilities Division
- Iowa Housing Authority
- Iowa Department of Transportation
- Iowa Veterans Services
- other programs under XVIII - XX of the Social Security Act

CILs and DSE/DSUs coordinate services and resources with other providers to ensure independent living services funds are used as the last resource in order to ensure the funds are well utilized. In other words, if a consumer partner is eligible for another program/service, CILs and DSE/DSUs will assist them to apply for that program/service. This ensures that there is no duplication of services and ensures that independent living services funds are utilized for individuals who would otherwise be unserved by other resources.

Services are coordinated at the local level between the CILs and DSE/DSUs to avoid duplication and to maximize self-direction on the part of the individual consumer. The services provided by the DSE/DSUs are unique, specialized, and targeted to meet a service niche for which other resources do not exist or are minimally available. The use of comparable benefits is pursued whenever practical to ensure that Part B dollars are spent on services not otherwise available and targeted to people otherwise unable to be served. When other resources do exist, this information is made available to consumer partners, consistent with the practice of informed choice and consumer control. The DSE/DSUs and CILs do exchange referrals, recognizing that each provider offers unique services necessary for consumers to reach their independent living goals.

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Section 3: Network of Centers

3.1 Existing Centers

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

Iowa Network of Centers for Independent Living

Legal Name	Counties Served	Funding Streams	Oversight Process	Oversight Entity	SPIL Signatory (Yes or No)
Disabilities Resource Center of Siouxland (DRCS-Sioux City)	3 Counties Served Part C, B, and State Funds: Woodbury Part B Funds & State Funds ONLY: Cherokee & Plymouth	Part C, Part B, State, Other, CARES Act	DSE (IVRS) has signed contract with each CIL. They require GAXs and documentation of all receipts, as well as quarterly progress reports on activities. IVRS on-site reviews once every 3 years.	DSE (IVRS) for Part B and State Funding and ACL for Part C Funding	Yes
South Central Iowa Center for Independent Living (SCICIL-Oskaloosa)	6 Counties Served Part C, B, and State Funds: Appanoose, Mahaska, Monroe Part B Funds & State Funds ONLY: Keokuk, Marion, & Wapello	Part C, Part B, State, Other, CARES Act	DSE (IVRS) has signed contract with each CIL. They require GAXs and documentation of all receipts, as well as quarterly progress reports on activities. IVRS on-site reviews once every 3 years.	DSE (IVRS) for Part B and State Funding and ACL for Part C Funding	Yes
Illinois/Iowa Center for Independent Living (IICIL-Quad Cities)	3 Counties Served Clinton, Muscatine, Scott	Part C, Part B, State, Other, CARES Act	DSE (IVRS) has signed contract with each CIL. They require GAXs and documentation of all receipts, as well as quarterly progress reports on activities. IVRS on-site reviews once every 3 years.	DSE (IVRS) for Part B and State Funding and ACL for Part C Funding	Yes
Southwest Iowa Center for Independent Living (SWICIL-Council Bluffs)	8 Counties Served Cass, Fremont, Harrison, Mills, Montgomery, Page, Pottawattamie , Shelby	Part C, Part B, State, Other, CARES Act	DSE (IVRS) has signed contract with each CIL. They require GAXs and documentation of all receipts, as well as quarterly progress reports on activities. IVRS on-site reviews once every 3 years.	DSE (IVRS) for Part B and State Funding and ACL for Part C Funding	Yes
Central Iowa Center for Independent Living (CICIL-Des Moines)	7 Counties Served Boone, Dallas, Jasper, Madison, Polk , Story, Warren	Part C, Part B, State, Other, CARES Act	DSE (IVRS) has signed contract with each CIL. They require GAXs and documentation of all receipts, as well as quarterly progress reports on activities. IVRS on-site reviews once every 3 years.	DSE (IVRS) for Part B and State Funding and ACL for Part C Funding	Yes
Access 2 Independence of the Eastern Iowa Corridor (A2I-Iowa City)	8 Counties Served Benton, Cedar, Henry, Iowa, Johnson , Jones, Linn , Washington	Part C, Part B, State, Other, CARES Act	DSE (IVRS) has signed contract with each CIL. They require GAXs and documentation of all receipts, as well as quarterly progress reports on activities. IVRS on-site reviews once every 3 years.	DSE (IVRS) for Part B and State Funding and ACL for Part C Funding	Yes

(BOLD font on counties indicates the county where the CIL's main office(s) is/are located.)

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There are six CILs in Iowa, and they all provide the required five core Independent Living Services. The CILs serve a total of 35 of the 99 Iowa counties. A total of 30 of these counties are funded for services through Part C, Part B, and State funding, and the other 5 counties are funded for services through Part B and State funding. All six CILs receive federal Part C, federal Part B, and State funds, and all are eligible to sign the SPIL, as all Part C funded CILs are eligible to sign the SPIL.

Statement on Use of CARES Act Funding: The CILs received a total of \$941 in CARES Act funding in 2020. They will be using some of this funding in 2020, and some in 2021. The CILs will use the CARES Act funds to for allowable expenses to meet the current, and emerging, needs due to the COVID-19 pandemic in the Part C funded counties they serve. Each CIL will determine the most appropriate use of the funding based on the needs for their particular service area, and will collaborate with other organizations as determined to be appropriate.

3.2 Expansion and Adjustment of Network

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

Minimum funding level for a Center and formula/plan for distribution of funds to bring each Center to the minimum. Exceptions must be explained with sufficient detail.

Served, Underserved, and Unserved Counties in Iowa:

Iowa has 6 Centers for Independent Living. They serve 35 of Iowa’s 99 counties. Of those 35 “served” counties, 29 are considered “underserved” because Iowa CILs are severely underfunded. The remaining 64 counties are all unserved by CIL services. Below is a chart of names of counties served, underserved, and unserved:

Center Name	Counties Served by CIL	Counties Underserved by CIL	Unserved Counties CIL Would Like to Serve If Additional Funds Become Available
DRCS	Woodbury	Cherokee, Plymouth	Sioux, Lyon, Dickinson, Emmet, Kossuth, Palo Alto, Clay, O’Brien, Buena Vista, Pocahontas, Humboldt, Calhoun, Sac, Ida
SCICIL	Appanoose, Mahaska, Monroe	Keokuk, Marion, Wapello	Jefferson, Van Buren, Davis, Wayne, Lucas, Poweshiek
HCIL	Scott	Clinton, Muscatine	Winneshiek, Allamakee, Clayton, Fayette, Buchanan, Delaware, Dubuque, Jackson, Louisa, Des Moines, Lee
SWICIL	Pottawatomie	Cass, Fremont, Harrison, Mills, Montgomery, Page, Shelby	Monona, Crawford, Carroll, Green, Guthrie, Audubon, Adair, Adams, Taylor
CICIL	Polk	Boone, Dallas, Jasper, Madison, Story, Warren	Webster, Hamilton, Hardin, Marshall, Clarke, Decatur, Ringgold, Union
A2I	Johnson	Benton, Cedar, Henry, Iowa, Jones, Linn, Washington	Winnebago, Worth, Mitchell, Howard, Hancock, Cerro Gordo, Floyd, Chickasaw, Wright, Franklin, Butler, Bremer, Black Hawk, Grundy, Tama

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Guidelines for Modification to the SPIL Financial Plan for Expansion of the Network 2020-2021 and 2021-2022 and 2022-2023

The current six CILs are each funded by Part C, Part B, and State Funding, and as such are all eligible to receive funding increases in Part C, Part B, and State funding, as long as each CIL remains in compliance with the federal Rehabilitation Act Standards and Indicators and other applicable regulations, and remain in compliance with their financial and programmatic contracts with Iowa Vocational Rehabilitation Services (IVRS).

The first priority of the federal Rehabilitation Act is to develop a new CIL to serve counties unserved by CIL services when new federal Part C funding becomes available. In order to meet that priority in Iowa, these are the conditions that MUST EXIST for new federal funds to be used to start a NEW CIL:

In order for new federal Part C funds to be utilized to start a new Center for Independent Living, all of the following four conditions MUST exist:

1. The current six CILs are all funded at 100% of their specified Adequate Level of Funding per Priority 1 below.
2. There is a minimum of \$250,000 remaining in new federal Regular Part C funding to start a new CIL AND the new CIL must serve 1-3 counties. The CILs, SILC, and DSUs have drafted an itemized budget that outlines the minimum costs for starting up a new CIL serving 1-3 counties, which is \$250,000, and this document is on file in the SILC office. Priority for a new CIL will be given to opening a new Center in the Waterloo area where a previous CIL closed. This would include serving at least three of the five counties of Black Hawk, Buchanan, Bremer, Butler, and Grundy.
3. The group who wants to start a new CIL has provided assurances that they will comply with the standards and indicators for CILs as outlined in the Federal Rehabilitation Act as well as the fiscal and programmatic reporting requirements as identified in the Act.
4. The new federal funding must NOT be one-time federal funding that will end. No one time federal funding may be used to start a new CIL. One-time federal funding is any federal funding that is not ongoing and that is a one-time funding appropriation with no continued funding in subsequent years, and/or no continued funding after 1-5 years.

However, the Iowa IL Network is opposed to starting new Centers for Independent Living. Instead, the existing six CILs would prefer to add unserved counties to their existing CIL for services when the first priority has been met below and there is additional funding available to expand the network. This will be discussed below.

1. Federal Regular Part C Funds Funding Priorities

Priority #1 – Bring the existing 6 CILs up to the Adequate Level of Funding as specified below.

Whenever new federal Part C funds are appropriated, the amount of the new federal Part C funds OVER COLA (Cost of Living Adjustment) will be distributed to the six Iowa CILs based upon the current percentage of Part C that each CIL receives, until every CIL has reached 100% of its Adequate Level of Funding as specified in this SPIL. Once a CIL has reached 100% of Adequate Level of Funding, the

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remaining funds that would have gone to that CIL will be distributed proportionately (based on the current percent of Part C funds each receives) to the other CILs who are not yet at their Adequate Level of Funding. All CILs must be at their Adequate Level of Funding before any new federal Part C funds can be utilized to start a new Center, as specified below.

The Iowa Network of Centers for Independent Living would prefer to NOT open any NEW CILs, but would prefer that each of the six CILs expand into additional unserved counties once all CILs have reached their Adequate Level of Funding as specified below. The CILs have all agreed as to which of the unserved counties they would serve once every CIL has reached their Adequate Level of Funding. This expansion plan will be discussed later in this document.

Formula For Adequate Level Of Funding

The Iowa CILs developed a Funding Formula that details an itemized budget of the minimum amount of funding required to operate a CIL with three or fewer counties. The minimum amount of funding was determined to be \$250,000 (Adequate Level of Funding for 1-3 counties) based upon known operating costs of number of staff and their salaries and benefits, along with other costs of operation such as rent, supplies, mileage, insurance, and so forth.

The Iowa CILs then created a second detailed itemized budget that outlines costs associated with adding one county. The amount of additional funding was determined to be \$50,000 per county based on hiring additional staff and the associated costs.

However, to provide a more fair distribution of funds overall for the total current counties that each CIL is serving, a formula was developed to distribute half of this \$50,000 amount, per counties over 3, based on total number of counties served over three counties, and half on the disability population in the total counties served for all CILs, regardless of the number of counties they serve.

With the addition of the 5th IL Core Service of Transition in 2014, the CILs have added in additional funding needed to provide this core service, specifically in terms of the costs for transitioning people out of institutions. CILs will need additional funding to hire staff to do transition, and to pay for the up-front costs to transition people (for example, first and last months rent, utility deposit, furniture, kitchen items, sheets, towels, and clothing).

Iowa CIL Funding Formula

- 1-3 Counties Served: A Minimum \$250,000 budget, plus an additional amount based on the total disability population in the total counties served by each CIL, as a higher population will require additional funds to hire adequate staff to serve the population.
- For all counties served over 3, add \$50,000 per county, with \$25,000 based on the formula for number of counties served by each CIL over 3, and \$25,000 based on the total disability population in the total counties served by each CIL for all CILs regardless of the number of counties they serve.
- **5th Core IL Service of Transition:** CILs will need funds for one additional staff person for CILs serving 3 or less counties and with a total disability population for their service area of less than 30,000. The other CILs will need funding for two additional staff persons for CILs serving

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3 or more counties and with a total disability population for their service area of 30,000 or more. This would be a cost of \$50,000 per staff person for staff salary, benefits, and mileage. Added to this amount would be \$4,000 per person transitioned for the upfront transition costs, times an average of 10 people transitioned per year. This would allow CILs serving 3 counties and a total disability population for their service area of less than 30,000 to transition an average of 10 people per year, and CILs serving 3 or more counties with a total disability population for their service area of 30,000 or more to transition an average of 20 people per year.

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Below is a chart which outlines the Adequate Funding Level needed for each CIL.

CALCULATION CHART FOR 100% ADEQUATE FUNDING LEVEL FOR EACH CIL

CIL	Number of Counties Served	Number of Counties OVER 3	Total Disability Population in Counties Served	Total Disability Population in Counties Served Divided by 10,000	Minimum Funding for 1-3 Counties	Funding Per Additional County \$25,000 x # of Additional Counties Over 3	Funding Per Stakeholder At \$25,000 Per Every 10,000 PWDs	Funding for 5 th Core IL Service of Transition At 1-2 Staff PLUS \$4,000 x 10-20 PWDs	TOTAL FUNDS NEEDED FOR ADEQUATE FUNDING LEVEL
DRCS	3	0	16,975	1.6975	+\$250,000	-0-	+42,438	+90,000	\$382,438
SCICIL	6	3	17,313	1.7313	+\$250,000	+75,000	+43,283	+180,000	\$548,283
IICIL	3	0	28,520	2.852	+\$250,000	-0-	+71,300	+90,000	\$411,300
SWICIL	8	5	25,401	2.5401	+\$250,000	+125,000	+63,503	+180,000	\$618,503
CICIL	7	4	80,566	8.0566	+\$250,000	+100,000	+201,415	+180,000	\$731,415
A2I	8	5	46,615	4.6615	+\$250,000	+125,000	+116,538	+180,000	\$671,538
TOTAL:	35	17	215,390	N/A	\$1,500,000	\$425,000	\$538,477	\$900,000	\$3,363,477

Priority # 2 – Further Expanding Iowa’s IL Network of CILs Into Additional UNSERVED Counties, Including the Development of a New CIL

Should federal increases in Regular Part C funds satisfy Priority #1 above, and there is additional funding available, the second priority is expansion of the IL Network to additional counties that are currently UNSERVED by CIL services, rather than opening a new CIL. These 64 unserved counties include: Adair, Adams, Allamakee, Audubon, Black Hawk, Bremer, Buchanan, Buena Vista, Butler, Calhoun, Carroll, Cerro Gordo, Chickasaw, Clarke, Clay, Clayton, Crawford, Davis, Decatur, Delaware, Des Moines, Dickinson, Dubuque, Emmet, Fayette, Floyd, Franklin, Greene, Grundy, Guthrie, Hamilton, Hancock, Hardin, Howard, Humboldt, Ida, Jackson, Jefferson, Kossuth, Lee, Louisa, Lucas, Lyon, Marshall, Mitchell, Monona, O'Brien, Osceola, Palo Alto, Pocahontas, Poweshiek, Ringgold, Sac, Sioux, Tama, Taylor, Union, Van Buren, Wayne, Webster, Winnebago, Winneshiek, Worth, and Wright.

The expansion of the network would allow existing CILs to expand their services to unserved counties. The network believes it is more cost effective for existing CILs to expand to serve the unserved counties, rather than start new CILs.

There must be a minimum funding level of \$50,000 remaining in new federal Regular Part C funding in order for a CIL to expand services to a new county, and CILs will have to compete for the new funding.

Priority for expanding a CIL to serve unserved counties will first be given to serving counties in the Waterloo area where a previous CIL closed. This would include the five counties of Black Hawk, Buchanan, Bremer, Butler, and Grundy.

The Administration on Community Living (ACL) will hold a competition to expand existing CILs into counties currently unserved by CIL services. Expansion of CILs into additional unserved counties would include the current 64 counties unserved by CIL services, as listed above, and would be counties that are adjacent or in close enough in proximity to each CIL’s current service area for the CIL to reasonably be able to serve that county.

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In the event there is less than \$50,000 remaining in new Part C funds, this amount will be divided equally among the existing CILs.

Here are the 64 unserved counties that each CIL has agreed to serve when funding becomes available:

Center Name	Unserved Counties to be Served by This CIL	Current Counties Served	Total Counties to be Served
DRCS	15 Counties: Sioux, Lyon, Dickinson, Emmet, Kossuth, Palo Alto, Clay, O'Brien, Buena Vista, Pocahontas, Humboldt, Calhoun, Sac, Ida	3 Counties: Woodbury , Cherokee & Plymouth	18 Counties
SCICIL	6 Counties: Jefferson, Van Buren, Davis, Wayne, Lucas, Powesheik	6 Counties Served: Appanoose, Mahaska , Monroe, Keokuk, Marion, & Wapello	12 Counties
IICIL	11 Counties: Winneshiek, Allamakee, Clayton, Fayette, Buchanan, Delaware, Dubuque, Jackson, Louisa, Des Moines, Lee	3 Counties: Clinton, Muscatine, Scott	14 Counties
SWICIL	9 Counties: Monona, Crawford, Carroll, Green, Guthrie, Audubon, Adair, Adams, Taylor	8 Counties: Cass, Fremont, Harrison, Mills, Montgomery, Page, Pottawattamie , Shelby	17 Counties
CICIL	8 Counties: Webster, Hamilton, Hardin, Marshall, Clarke, Decatur, Ringgold, Union	7 Counties: Boone, Dallas, Jasper, Madison, Polk , Story, Warren	15 Counties
A2I	15 Counties: Winnebago, Worth, Mitchell, Howard, Hancock, Cerro Gordo, Floyd, Chickasaw, Wright, Franklin, Butler, Bremer, Black Hawk, Grundy, Tama	8 Counties: Benton, Cedar, Henry, Iowa, Johnson , Jones, Linn , Washington	23 Counties
TOTALS:	64	35	99

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2. Federal Regular Part B Funds Funding Priorities

Increases in Regular Part B funding will be given to the partners based upon the percentage that each partner currently receives in Part B funding. Partners are the SILC, IVRS, IDB, and the CILs. The percentage of the total new Part B funds that goes to the CIL partners will be divided equally among the CILs who currently receive Part B funds.

During the course of the 3 year SPIL, the SILC, CILs, and the DSE/DSUs may agree to re-allocate the Part B funds among the partners for a number of reasons, including but not limited to the following: a CIL is not going to utilize their Part B funds in any given year; state budget cuts that require the reduction of other funding sources to the partners which means re-allocation of the Regular Part B may be necessary to maintain operational budgets of any of the partners. In order for a CIL to receive Part B federal funds, they must be in compliance with the federal Rehabilitation Act Standards and Indicators and other applicable federal regulations, and be in compliance with their financial contracts with Iowa Vocational Rehabilitation Services (IVRS).

When there are CILs that have not been eligible to receive Part B funds, as determined by IVRS, and who at some point during this SPIL become eligible to receive Part B funds, the following procedure is followed:

- IVRS will determine if a CIL is eligible to have a contract with IVRS for Part B Funds.
- CILs are required to contract with IVRS for these funds, and these funds become available annually on October 1st.
- If a CIL has not been eligible to receive Part B funds, and at some point is determined by IVRS to be eligible to contract with IVRS for the funds, they will not be eligible for their share of these funds until the new federal fiscal year begins, which is on October 1st.
- All Part B funds will be divided equally among all CILs determined to be eligible by IVRS for these funds. If a CIL who previously was not eligible for Part B funds becomes eligible, this means the other already eligible CILs will have a reduction in the Part B funds they are currently receiving, for the next federal fiscal year, as all Part B funds are distributed equally among the eligible CILs.

When IVRS determines that a current CIL who contracts with IVRS is no longer eligible to contract with IVRS, those Part B funds that were going to that CIL are to be redistributed equally to the remaining CILs who are eligible to contract with IVRS.

If there are cuts to the Part B funds, all partners will receive a cut in their Part B funds in proportion to the amount of Part B funds they currently receive at the time of the cut.

If any of the CILs or the SILC are unable to expend their Part B funds by the end of the federal fiscal year, they will negotiate with IVRS to see if they can carry-over the unused portion to the next fiscal year. The entity requesting the carry-over will be responsible for providing a written analysis regarding why the funds were not expended and strategies/actions that will occur to minimize this happening next year. IVRS will make the determination as to whether there was just cause for the partner to not be able to expend all of the funds during the fiscal year it was awarded. IVRS will allow the partner to carry over the funds if in their determination there is just cause as to why the partner was unable to expend all of the funds. If IVRS determines there is not just cause, the remaining funds will be carried over into the next fiscal year and be divided among the remaining CILs as a one-time amount they must expend by the end of the next fiscal year.

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3. State Funding Priorities

During the course of this three-year SPIL, the CILs will be working with the Governor's office and state legislators to obtain additional state funding for CILs.

New state funding received will be divided equally among all the CILs who are eligible to receive a contract with IVRS.

In order for a CIL to receive state funds they must be in compliance with the federal Rehabilitation Act Standards and Indicators and other applicable federal regulations, and be in compliance with their financial contracts with IVRS, including Iowa State Accounting Standards.

When there are CILs that have not been eligible to receive State Funds, as determined by IVRS, and who at some point during this SPIL become eligible to receive State Funds, the following procedure is followed:

- IVRS will determine if a CIL is eligible to have a contract with IVRS for State Funds.
- CILs are required to contract with IVRS for these funds, and these funds become available annually on July 1st.
- If a CIL has not been eligible to receive State Funds, and at some point is determined by IVRS to be eligible to contract with IVRS for the funds, they will not be eligible for their share of these funds until the new state fiscal year begins, which is on July 1st.
- All state funds will be divided equally among all CILs determined to be eligible by IVRS for these funds. If a CIL who previously was not eligible for State Funds becomes eligible, this means the other already eligible CILs will have a reduction in the state funds they are currently receiving, for the next state fiscal year, as all state funds are distributed equally among the eligible CILs.

When IVRS determines that a current CIL who contracts with IVRS is no longer eligible to contract with IVRS, those State funds that were going to that CIL are to be redistributed equally to the remaining CILs who are eligible to contract with IVRS.

If there are cuts to the State Funds, all CILs receiving State Funds will share equally in the cut.

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

CIL Closure Priority

If a federal Part C funded CIL relinquishes their grant(s) and closes their CIL, it is Iowa's intent to make it a first priority for ACL to conduct a grant competition for a new CIL in the same service area that was served by the CIL that closed. If the closed CIL received any federal Part B or state funds, the new CIL may apply for those funds through the contract process as established by Iowa Vocational Rehabilitation Services (IVRS) and as consistent with the Iowa State Plan for Independent Living (SPIL). If the ACL grant competition does not result in a new CIL, the federal Part C funds designated for that service area will be temporarily divided among the other existing Part C funded CILs based upon their current percentage of federal Part C funds, for the next fiscal year. ACL will then conduct a second grant competition to find a suitable applicant to open a new CIL in the service area that was served by the CIL that was closed. If a suitable applicant is found, the current CILs will give up the temporary funding they received and it will go to the new CIL. Any federal Part B funds or state funds that were designated for the former CIL will be

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temporarily divided equally among the remaining eligible CILs as determined through the contract process as established by Iowa Vocational Rehabilitation Services (IVRS) and as consistent with the Iowa State Plan for Independent Living (SPIL). These Part B and state funds will then be given to the new CIL in the following year if a suitable applicant is found to open a new CIL in the service area of the closed CIL. In the event no suitable candidate is found in the second round of grant competition, the federal Part C funds will be divided among the remaining CILs based on the current percentage of Part C that each receives. The Part B funds and state funds that the closed CIL received will be divided equally among the remaining eligible CILs as determined through the contract process as established by Iowa Vocational Rehabilitation Services (IVRS) and as consistent with the Iowa State Plan for Independent Living (SPIL). It should be noted that there IS a precedence to temporarily give Part C funds to CILs while holding a competition to start a new CIL. In Guam, a grant competition was held to open a CIL in Guam, but no suitable candidate was found. RSA then gave those funds TEMPORARILY to the CILs in Hawaii, and then held another competition for the CIL in Guam. When a suitable candidate for a Guam CIL is found, the Hawaii CILs will give up those temporary funds to go back to the new CIL in Guam.

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

As stated previously, when there are cuts to the federal Part B funds and/or State funds, all partners will share equally in that cut based on the percentage of the funding they receive from each funding source.

Plan for changes to Center service areas and/or funding levels to accommodate expansion and/or adjustment of the Network.

As stated previously, once all existing CILs reach their Adequate Level of funding as outlined in this SPIL, when new Part C funds become available, if they are at least \$50,000, a grant competition will be held by ACL among the existing CILs to expand their current CIL services into unserved counties, as outlined previously in this SPIL document. Priority will be giving to funding a CIL to serve the counties that were previously served by the CIL in Waterloo which closed.

Plan for one-time funding and/or temporary changes to Center service areas and/or funding levels.

One Time Federal Part B and Part C Funding Priorities

One-time federal funding is any federal funding that is not ongoing and that is a one-time funding appropriation with no continued funding in subsequent years.

In the event there is one-time Part B federal independent living funding, it will be disbursed to all of the partners based upon the percentage that each partner currently receives of the Regular Part B funds. The partners are the SILC, DSE/DSUs, and CILs. In terms of the CILs, the total amount of one-time Part B funding designated for CILs will be equally divided among the existing CILs who are eligible for that funding as determined by IVRS.

The SILC/DSE/DSUs may also decide to give up their one-time Part B funding to the CILs if they so choose.

In the event that there is one-time Part C federal independent living funding, such as what happened with the American Recovery and Reinvestment Act (ARRA) funding, this funding will be disbursed equally among all of the current CILs, unless it will affect Regular Part C funding in the years after the one-time

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funding goes away. If it will affect the amounts of Regular Part C in subsequent years, the one-time Part C funding is to be disbursed to the current CILs based upon the current percentage of Regular Part C that each CIL receives.

Section 4: Designated State Entity

Iowa Vocational Rehabilitation Services will serve as the entity in **Iowa** designated to receive, administer, and account for funds made available to the state under Title VII, Chapter 1, Subchapter B of the Act on behalf of the State. (*Sec. 704(c)*)

4.1 DSE Responsibilities

- (1) receive, account for, and disburse funds received by the State under this chapter based on the plan;**
- (2) provide administrative support services for a program under subchapter B, and a program under subchapter 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 Subchapter B. for the performance of the services outlined in paragraphs (1) through (4).**

The Designated State Entity (DSE), Iowa Vocational Rehabilitation Services (IVRS) agrees to comply with the above listed DSE responsibilities. While IVRS receives a portion of the federal Part B funds, they use it for program services to Consumers, so the 5 percent is not used to fund the DSE Responsibilities listed above. Of the \$338,717 in federal Part B funds, IVRS receives \$81,432 of those funds to provide direct services to Consumers, and does not use it to cover their administration costs to perform their DSE responsibilities.

4.2 Grant Process & Distribution of Funds

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

IVRS does written contracts annually with the CILs and the SILC for their portions of the Part B funds, and another contract for the CILs State funds. These contracts outline how each entity will use the funds, and the activities to be completed. Only the six current CILs are eligible to receive the State funds. IVRS requires the CILs and the SILC to submit documentation of all expenditures in order to be reimbursed for the use of their Part B funds, and also requires quarterly progress reports on the funding use and activities.

The contracts establish performance measures, supporting documentation, and quarterly reporting expectations. These reports are monitored on a quarterly basis with a year-end summary. Onsite visits or file reviews are conducted at a minimum of once every three years. Specific indicators are agreed upon by IVRS and the Center for measures related to review of client service records. Discussions with the Center directors and the direct service providers are opportunities to elaborate on case file reviews and to obtain immediate feedback on service provisions. Goals relate to information and referral pertaining to numbers of meetings and types of activities as well as agreed upon indicators for IL Skills Training, Peer Counseling, Individual and System advocacy services, and Transition services. Information is reviewed

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during the quarterly reporting and end of year reports as well as, if necessary, through file review. IVRS has a designated Resource Manager position responsible for program contract oversight and a designated accountant responsible for fiscal accountability. IVRS also conducts monthly CORE meetings (this is our internal Contract Oversight Review Committee), which discusses financial and program strengths/weaknesses per each reporting period. This can trigger further discussion with the CIL if necessary. IVRS also participates in the Statewide Independent Living Council meetings, which do contain discussions with CIL directors on program services. These conversations build awareness of service delivery issues or new strategies that are being developed and can trigger additional conversation or oversight if applicable.

4.3 Oversight Process for Subchapter B Funds

The oversight process to be followed by the DSE.

The CILs and SILC must each submit a GAX to IVRS which lists all expenditures for the month, along with receipts for every expenditure. IVRS reviews this documentation and then approves reimbursement of the funds spent. The CILs and SILC must also provide quarterly progress reports to IVRS on the progress made on the activities outlined in their contract with IVRS. In the case of the SILC, IVRS monitors all SILC expenditures via the monthly GAX and documentation to ensure the expenditure of funds are reasonable, appropriate, and allowable. They also do this for the CILs Part B funds and State funds. Additionally, IVRS staff conducts on-site visits to each CIL at least once every three years to review files and financials of the CIL. If any problems are discovered, IVRS will develop a written corrective action plan with the CIL or SILC to correct any problems. The Administration on Community Living/Office of Independent Living Programs (ACL/OILP) provides the oversight of the CIL's Part C funds.

4.4 Administration and Staffing

Administrative and staffing support provided by the DSE.

Iowa Vocational Rehabilitation Services (IVRS) will continue to be the Designated State Entity (DSE) for the Iowa Independent Living Program. IVRS Accountants and an IL Resource Manager monitor contracts with CILs and the SILC for fiscal and programmatic oversight. The IL Resource Manager also manages the Iowa IL Network-related duties including participating on the SILC Council, participating in SILC committee work, and maintaining partnerships with other agencies. The IVRS IL Specialist's position provides the SILS services across the state. The IVRS IL Specialist position is half-time and is supported by a half-time clerical staff. IVRS provides direct IL services to Consumers. IVRS does not use Part B funds to fund the fiscal and programmatic responsibilities they have with the SPIL. There is no DSE employee who serves as staff to the SILC.

IVRS maintains responsibility for program and fiscal oversight of the SILC, specifically as it relates to budget operation, allowability and allocability of costs, and to ensure participation in the State Plan for Independent Living. IVRS does not have a voting representation on council decisions, but does participate in a member/advisory role. The Council members maintain sole ownership of their decisions and oversight of the SILC, and IVRS has no authority in voting or even approving or not approving the State Plan, because if IVRS and the SILC can't come to agreement, everything stops. This helps maintain an environment to prevent conflicts of interest. IVRS supports the IL philosophy and share resources and programs to provide IL services to Iowans with disabilities as the coverage through the Centers is not statewide due to limited finances. IVRS has a unique, one of a kind split VR and IL position that provides those services. IVRS attempts to maximize referrals to IVRS for employment services due to the limited scope of both program and financial resources of the IL program. All of these services are coordinated

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through the State Plan and in joint collaboration with the SILC Council. These collaborative activities are designed to prevent conflicts of interest, and if any are identified they would be brought to the attention of the membership through the SILC Executive Director and the Administrator of IVRS. IVRS also partners with the Iowa Department for the Blind in coordination and support of IL services and employment programs, so there are a number of reviews and conversations occurring, which helps minimize potential conflicts and encourage collaborative joint planning. Instead of creating conflict of interest, the SILC and IVRS have created a partnership to benefit Iowans with disabilities. IVRS and SILC value one another's partnership, and because of that mutual understanding through that partnership, both entities support the various activities and services provided by each entity in order to expand the capacity in the geographic area, time, staffing, and funding to benefit Iowans with disabilities seeking supports for IL.

4.5 State Imposed Requirements

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

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

The SILC and CILS should adhere to all state policies and procedures related to oversight of the state portions for funding with specific examples being use of out-of-state travel approval, and state rates for mileage, meals, hotels, and awards.

IVRS sees the SILC and CILs as partners, and IVRS has no stated authority to change or revise the SPIL without the consent of the SILC and a majority of the CIL Directors. The only state imposed requirements which require monitoring relate to fiscal purchasing and operations to ensure IVRS stays consistent with state parameters. These conditions are identified and reviewed through the contract process. Therefore, just due to the nature of the limited authority of IVRS being unable to vote in SILC matters, they have complete autonomy to make decisions that will either be supported or not supported by IVRS as a contract monitor. Concerns would then be addressed in the monitoring reviews and future contracts. The IVRS operation of the IVRS internal IL program and services is limited to a small number of cases and again is done to maximize limited dollars of both the SILC, Centers, and IVRS IL Program. The IVRS contract fiscal and program monitoring help ensure compliance with fiscal requirements and the program review helps ensure the quality of the outcomes being reported, but there is no authority to restrict the autonomy of the IL services being provided and if so, this would result in discussions impacting the awarding of the contracts. Through recent history, there have been no conflicts and when it was applicable in prior history it was due to financial or program compliance issues from the Centers, which were dealt with in collaboration with the SILC and involved Centers.

4.6 722 vs. 723 State

Check one:

722 (if checked, with move to Section 5)

723 (if checked, will move to Section 4.4)

4.7 723 States NOT APPLICABLE

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Order of priorities for allocating funds amounts to Centers, agreed upon by the SILC and Centers, and any differences from 45 CFR 1329.21 & 1329.22.

How state policies, practices, and procedures governing the awarding of grants to Centers and oversight of the Centers are consistent with 45 CFR 1329.5, 1329.6, & 1329.22.

Section 5: Statewide Independent Living Council (SILC)

5.1 Establishment of SILC

How the SILC is established and SILC autonomy is assured.

The SILC was established to meet the requirements of the Rehabilitation Act, Title VII, Chapter 1 as amended in 2014. Given the fact that the SILC was created by federal legislation, a state law or governor's executive order was not used to establish a SILC in Iowa. The SILC originally operated as an autonomous, free standing entity whose members were appointed by the Governor. It developed bylaws consistent with mandates of Title VII and took on full partnership with the DSUs in developing, implementing, and monitoring the SPIL. In order to more clearly define its rather nebulous legal standing, the Iowa SILC incorporated and became a 501(c)3 in the fall of 2005. Although the SILC is now a non-profit corporation, the members continue to be appointed by the Iowa Governor, based upon all the requirements in the federal Rehabilitation Act. The Iowa SILC is an independent entity with respect to the DSE/DSUs and all other state agencies.

The SILC has its own office, hires and supervises its own staff, develops and approves its own budget, pays its own bills, and has its own checking account. IVRS has no authority to influence SILC operations, but serves as program and fiscal oversight per an established contract. IVRS has a staff person who is Governor-appointed to the SILC to represent IVRS, but they are an ex-officio, non-voting member. The SILC welcomes input from all ex-officio, non-voting members as issues are discussed. However, they may not vote, so the Consumer-control of the Council is maintained by the Voting Members, of which at least 51% are individuals with disabilities who do not work for a State Agency or a Center for Independent Living. The SILC organizes and identifies their own meeting agenda topics and their members serve in their independent capacities on committees and as voting members. IVRS is not involved in the appointment of members by the Governor, and the SILC independently administers their program and fiscal operations in consultation with their leadership team and as necessary with oversight and consultation from IVRS as the Designated State Entity.

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.

The resources provided to the SILC are necessary and sufficient to ensure the capacity of the SILC to fulfill all the duties and selected authorities. The SILC has an annual operating budget of \$143,435, comprised of \$87,911 in Part B funds, \$45,000 in Title I Innovation and Expansion funds, and \$10,524 in SSA Reimbursement funds. The SILC has a full-time Executive Director that is overseen by the SILC Executive Committee.

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Process used to develop the Resource Plan.

The Resource Plan was initially developed based upon the budget that the SILC Council developed and approved to meet the funding needs for the SILC required activities under the Rehabilitation Act, as well as in collaboration with the CILs to determine fair distribution of the Part B and State funds.

Process for disbursement of funds to facilitate effective operations of SILC.

IVRS provides a Capital Advance to the SILC at the beginning of each federal fiscal year that is equal to the total budget divided by 12 months and multiplied by two months. This gives the SILC operating funds to pay bills, and the SILC submits monthly GAX forms and receipts documenting all expenditures to get reimbursed from IVRS for those expenses. Prior to the end of the fiscal year the amount of the Capital Advance is subtracted off of the last one or two GAXs to pay IVRS back, and a new Capital Advance is issued for the new fiscal year.

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

The total Part B appropriation for Iowa, including the State Match, is \$431,073. The SILC receives \$87,911 of this amount, which is only 20.39% of the total appropriation.

5.3 Maintenance of SILC

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

The SILC annually recruits individuals to apply to the SILC to be considered for appointment by the Governor. The SILC ED sends out an e-mail to her statewide e-mail distribution list, as well as posts the SILC Council openings on the SILC website. The Governor appoints SILC members. The SILC has a very good relationship with the Governor's office, and their staff sends the SILC all appointment resumes to review. The SILC Outreach Committee reviews all applications, and the committee reviews applicants in terms of what the federal requirements are for SILC members. The committee then provides a list of recommended candidates to the full SILC for their approval. Once the SILC approves that list, the SILC ED meets with the Governor's staff to go over the list and discuss how each candidate meets the federal requirements for SILC members. The SILC always provides a list of at least 8-10 candidates for the Governor to choose from to fill the annual 2-3 vacancies that occur as staggered terms end. The Governor then appoints the new members during the first week of July. The SILC ED has a list of all SILC members and their term start and end dates, and keeps the Governor's office informed when terms are ending or when someone needs to go off the SILC before their term ends so that the Governor can replace that slot as soon as possible.

The SILC is a 501(c)3 non-profit, is autonomous from State government, and has the needed autonomy necessary to fulfill its duties and authorities. Sufficient resources have been provided for the SILC Resource Plan to ensure the SILC has the capacity to fulfill its statutory duties and authorities.

The SILC has Bylaws, a Personnel Policy, and a Fiscal Policy to ensure accountability for their fiscal and programmatic operations. The SILC has one staff, the Executive Director, and the SILC Executive Committee provides oversight for the Executive Director.

The SILC has four Officer positions: President, Vice President, Treasurer, and Secretary. Only voting SILC members can be Officers, and the voting members of the Council elect these Officer positions annually at the May SILC meeting.

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Section 6: Legal Basis and Certifications

6.1 Designated State Entity (DSE)

The state entity/agency designated to receive and distribute funding, as directed by the SPIL, under Title VII, Subchapter B of the Act is **Iowa Vocational Rehabilitation Services**.

Authorized representative of the DSE: **David Mitchell** Title **IVRS Administrator**.

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 **Iowa Statewide Independent Living Council**.

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:

Disabilities Resource Center of Siouxland, Don Dew, ED

South Central Iowa Center for Independent Living, Deb Philpot, ED

Illinois/Iowa Center for Independent Living, Liz Sherwin, ED

League of Human Dignity, Southwest Iowa Center for Independent Living, Kathy Kay, CEO

Central Iowa Center for Independent Living, Reyma McCoy McDeid, ED

Access 2 Independence of the Eastern Iowa Corridor, Sarah Martinez, ED

6.4 Authorizations

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

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

6.4.c. State/DSE operation and administration of the program is authorized by the SPIL. **YES** (Yes/No)

Section 7: DSE Assurances

David Mitchell acting on behalf of the DSE **Iowa Vocational Rehabilitation Service** located at **510 E. 12th Street, Des Moines, Iowa 50319, 515-326-1785** *45 CFR 1329.11* assures that:

7.1. The DSE acknowledges its role on behalf of the State, as the fiscal intermediary to receive, account for, and disburse funds received by the State to support Independent Living Services in the State based on the plan;

7.2. The DSE will assure that the agency keeps appropriate records, in accordance with federal and state law, and provides access to records by the federal funding agency upon request;

7.3. The DSE will not retain more than 5 percent of the funds received by the State for any fiscal year under Subchapter B for administrative expenses;¹

7.4. The DSE assures that the SILC is established as an autonomous entity within the State as required in *45 CFR 1329.14*;

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- 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 Subchapter 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 Subchapter 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).

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

David Mitchell, Administrator, Iowa Vocational Rehabilitation Services

Name and Title of DSE director/authorized representative

David Mitchell signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

Signature

Date

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

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

8.1 Assurances

Liz Sherwin, Iowa SILC Chair, acting on behalf of the Iowa Statewide Independent Living Council, located at **300 East Locust, Suite 330, Des Moines, Iowa 50309, 515-282-0275, liz@iicil.com** 45 CFR 1329.14 assures that:

- (1) The SILC regularly (not less than annually) provides the appointing authority recommendations for eligible appointments;
- (2) The SILC is composed of the requisite members set forth in the Act;¹
- (3) The SILC terms of appointment adhere to the Act;¹
- (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.¹
- (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.¹

Section 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) STATE 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);

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- d. A process and timelines for advance notice to the public of SILC meetings in compliance with State and federal law and 45 CFR 1329.15(a)(3);
 - e. A process and timeline for advance notice to the public for SILC “Executive Session” meetings, that are closed to the public, that follow applicable federal and State laws;
 - i. “Executive Session” meetings should be rare and only take place to discuss confidential SILC issues such as but not limited to staffing.
 - ii. Agendas for “Executive Session” meetings must be made available to the public, although personal identifiable information regarding SILC staff shall not be included;
 - f. A process and timelines for the public to request reasonable accommodations to participate during a public Council meeting;
 - g. A method for developing, seeking and incorporating public input into, monitoring, reviewing and evaluating implementation of the State Plan as required in 45 CFR 1329.17; and
 - h. A process to verify centers for independent living are eligible to sign the State Plan in compliance with 45 CFR 1329.17(d)(2)(iii).
- (2) The SILC maintains regular communication with the appointing authority to ensure efficiency and timeliness of the appointment process.
- (3) The SILC maintains individual training plans for members that adhere to the SILC Training and Technical Assistance Center’s SILC training curriculum.
- (4) The SILC receives public input into the development of the State Plan for Independent Living in accordance with 45 CFR 1329.17(f) ensuring:
- a. Adequate documentation of the State Plan development process, including but not limited to, a written process setting forth how input will be gathered from the state’s centers for independent living and individuals with disabilities throughout the state, and the process for how the information collected is considered.
 - b. All meetings regarding State Plan development and review are open to the public and provides advance notice of such meetings in accordance with existing State and federal laws and 45 CFR 1329.17(f)(2)(i)-(ii);
 - c. Meetings seeking public input regarding the State Plan provides advance notice of such meetings in accordance with existing State and federal laws, and 45 CFR 1329.17(f)(2)(i);
 - d. Public meeting locations, where public input is being taken, are accessible to all people with disabilities, including, but not limited to:
 - i. proximity to public transportation,
 - ii. physical accessibility, and
 - iii. effective communication and accommodations that include auxiliary aids and services, necessary to make the meeting accessible to all people with disabilities.
 - e. Materials available electronically must be 508 compliant and, upon request, available in alternative and accessible format including other commonly spoken languages.
- (5) The SILC monitors, reviews and evaluates the State Plan in accordance with 45 CFR 1329.15(a)(2) ensuring:

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- 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, Subchapter B funds;
 1. If the resource plan includes Title VII, Subchapter B funds, the State Plan provides justification of the percentage of Subchapter B funds to be used if the percentage exceeds 30 percent of Title VII, Subchapter B funds received by the State;
 - ii. Funds for innovation and expansion activities under Sec. 101(a)(18) of the Act, 29 U.S.C. Sec. 721(a)(18), as applicable;
 - iii. Other public and private sources.
 - b. The funds needed to support:
 - i. Staff/personnel;
 - ii. Operating expenses;
 - iii. Council compensation and expenses;
 - iv. Meeting expenses including meeting space, alternate formats, interpreters, and other accommodations;
 - v. Resources to attend and/or secure training and conferences for staff and council members and;
 - vi. Other costs as appropriate.

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

Liz Sherwin, Iowa SILC Chair

Name of SILC Chairperson

Liz Sherwin signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

Signature

Date

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

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Section 9: Signatures

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

The effective date of this SPIL is October 1, 2020.

NOTE: Iowa has 6 CILs, and all six CIL Directors have signed this SPIL.

Liz Sherwin signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

SIGNATURE OF SILC CHAIRPERSON

DATE

Liz Sherwin

NAME OF SILC CHAIRPERSON

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The effective date of this SPIL is October 1, 2020.

Disabilities Resource Center of Siouxland

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

Don Dew signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

SIGNATURE OF CIL DIRECTOR

DATE

Don Dew

NAME OF CIL DIRECTOR

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The effective date of this SPIL is October 1, 2020.

South Central Iowa Center for Independent Living

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

Deb Philpot signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

SIGNATURE OF CIL DIRECTOR

DATE

Deb Philpot

NAME OF CIL DIRECTOR

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The effective date of this SPIL is October 1, 2020.

Illinois/Iowa Center for Independent Living

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

Liz Sherwin signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

SIGNATURE OF CIL DIRECTOR

DATE

Liz Sherwin

NAME OF CIL DIRECTOR

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The effective date of this SPIL is October 1, 2020.

League of Human Dignity, Southwest Iowa Center for Independent Living

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

Kathy Kay signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

SIGNATURE OF CIL DIRECTOR

DATE

Kathy Kay, League Co-CEO

NAME OF CIL DIRECTOR

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The effective date of this SPIL is October 1, 2020.

Central Iowa Center for Independent Living

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

Reyma McDeid signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

SIGNATURE OF CIL DIRECTOR

DATE

Reyma McCoy McDeid

NAME OF CIL DIRECTOR

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The effective date of this SPIL is October 1, 2020.

Access 2 Independence of the Eastern Iowa Corridor

NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

Sarah Martinez signed on 5/28/20. Signature pages provided to ACL in a separate PDF document.

SIGNATURE OF CIL DIRECTOR

DATE

Sarah Martinez

NAME OF CIL DIRECTOR