# STATE PLAN FOR INDEPENDENT LIVING (SPIL)

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

#### VII

#### PART B - INDEPENDENT LIVING SERVICES

Part C - Centers for Independent Living

State: Michigan

**FISCAL YEARS:** 

Effective Date: October 1, 2020 – September 30, 2023

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#### **Executive Summary**

Michigan's State Plan for Independent Living (SPIL) was created through statewide input from people with disabilities, their families, stakeholder organizations, and the public. Public input was the driving force behind the development of the SPIL. The team also utilized research-based data and established best practices. The SPIL writing team was composed of CIL Directors and SILC Members and was facilitated by the Statewide Independent Living Council (SILC) Executive Director with a majority of the writing team identifying as people with disabilities.

Public input was gathered throughout Michigan through in-person and virtual town hall meetings, online surveys, electronic communications, and a review of the priorities and goals of other disability focused organizations. Examining all input led to clear themes including lack of accessible and affordable housing; lack of affordable, accessible, and reliable transportation; continued barriers to employment; a shortage of personal care attendants; a need for better emergency response systems; and an overwhelming sense of social isolation for people with disabilities. It is clear how each of these themes weave together and are interrelated in achieving real life change and increased independent living opportunities for people with disabilities.

The mission of the Michigan Independent Living Network and the SPIL is that Michiganders with disabilities live independently and participate fully in their community. The SPIL has two primary goals and six focused objectives to measure progress and achievement of the mission. Objectives are measurable, achievable and resourced with lead organizations identified for accountability:

- 1. People with disabilities participate in all aspects of society through inclusive and accessible communities.
  - a. *Objectives*:
    - i. Systems Advocacy
    - ii. Personal Care Attendants
    - iii. Emergency Response
    - iv. Diversity and Inclusion
    - v. People who are blind increase their independence
- 2. The SILC is an effective coordinating, monitoring, and evaluating entity for the SPIL.
  - a. Objectives
    - Michigan SILC will demonstrate operational effectiveness and capability to develop, monitor, and evaluate the SPIL through compliance with all federal indicators and assurances.

The overall objectives of Goal 1 emphasize collaboration, training, and advocacy to increase independent living opportunities for people with disabilities over the course of this SPIL. These objectives and activities also afford each CIL the flexibility to focus their efforts on local issues of highest import to their community.

Goal 1 - Objective 1 and 2 of the SPIL are centered on systems change and personal care attendants. Through grassroots advocacy approaches and increased awareness by policy makers, the disability community will gain a foothold in creating change in significant life areas through the amplification of consumer voices leading to better outcomes for all people with disabilities.

Michigan is also facing a shortage of personal care attendants. This year, Michigan will need approximately 34,000 more trained personal care attendants (PCA) than we currently have. Michigan's aging/disability populations are growing and the shortage of quality PCAs has added to the service availability strain due to low wages and lack of worker incentives/benefits. In order for people with disabilities to gain or maintain their independence, the availability and quality of personal care attendants is critical to meet the needs of Michiganders.

There are opportunities in Goal 1 - Objectives 1 and 2 to collaborate with state level disability service partners. Michigan's aging population is rapidly growing and the needs of the aging population mirror some of the needs of people with disabilities relative to accessible and affordable housing, transportation, employment barriers, and the demand for quality personal care attendants. The SPIL activities include working with like-minded organizations to increase grassroots efforts and increase our impact.

The town hall meetings identified a continued need to improve local emergency responses for people with disabilities. In light of the recent events with the novel corona virus, SARS-CoV-2, the importance of emergency response efforts has become even more crucial. Emergency responders must be aware of where people with disabilities live in their communities as well as the needs of their residents. While emergency response teams are now required at the municipality level, the voices of people with disabilities are often nonexistent. The efforts of Goal 1 - Objective 3 include CILs assisting people with disabilities with developing their own personal emergency plans and registering with Smart 911. The recent pandemic presents an opportunity for CILs to engage with their emergency response teams to ensure people with disabilities are included in their emergency response plans.

Goal 1 - Objective 4 is centered around diversity and inclusion efforts, with an emphasis on underserved and unserved populations, as well as addressing issues of social isolation experienced by people with disabilities. The objective declares that people with disabilities are welcomed, respected and actively included in community activities to reduce social isolation. This will be accomplished through education and training on cultural competence for state agencies, partners, and community members and CIL development of diversity and inclusion pilots that lead to greater community inclusion for people with disabilities and sharing of best practices.

Goal 2's primary purpose is to ensure the SILC is an effective coordinating, monitoring, and evaluating entity for the SPIL. This is accomplished through ensuring the SILC is adhering to federal and state regulations and organizational policies and procedures. Activities include ongoing training, education, and effective participation of Council Members in terms of the SILC's purpose, roles and expectations, and effective monitoring of the SPIL. The SILC will also maintain and increase effective collaboration with Michigan CILs. This includes CIL

representation on the SILC, encouraging cross training and participation between CILs and the SILC, and regular and ongoing communications.

The SPIL provides detailed information on the distribution of funding and evaluative measures of the SPIL. SILC welcomes feedback on the services and supports provided for independent living through the CILs and SPIL goals.

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

#### 1.1 Mission:

Mission of the Independent Living Network and the SPIL.

Michiganders with disabilities live independently and participate fully in their community.

#### 1.2 Goals:

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

<u>Inclusion and Accessible Communities -</u> People with disabilities participate in all aspects of society through systems advocacy efforts, increased personal care assistant options, increased inclusion in emergency planning, effective outreach to unserved and underserved populations, and increased access to independent living services.

<u>Effective and Efficient Statewide Independent Living Council -</u> SILC will be an effective coordinating, monitoring, and evaluating entity for the SPIL through demonstration of adherence to federal standards and indicators.

#### 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.

<u>Objective 1.1 From Public Comment on Systems Change Advocacy</u>: People with disabilities are actively engaged in promoting and advancing disability rights through advocacy and leadership initiatives

Lead Organization(s): Disability Connections, MDRC, CILs & SILC

**Time Frame:** 10/01/2020 - 09/30/2023

#### **Measurable Indicators:**

- 1) Increase consumer engagement in the CIL Network Legislative Day through educating participants on legislative issues and process
- 2) Increase in number of CIL Youth Advocacy & Leadership programs
- 3) Statewide CIL/Youth Leadership Summit planned and held

Geographic Scope: Statewide

**Target Year 3:** 

- 1) 20% increase in people with disabilities participating in CIL Network Legislative Day
- 2) 5 CIL's replicate Youth Advocacy Leadership Program
- 3) Statewide CIL/Youth Leadership Summit held

#### **Targets Years 1-2:**

- 1) Establish baseline for number of people with disabilities participating in CIL Network Legislative Day in Year 1 and increase annually by 10%
- 2) Year 1 Identify existing CIL Youth Advocacy & Leadership programs and events, Year 2 collaborate with MDRC and provide technical assistance to identify Youth Advocacy & Leadership promising practices for CIL replication
- 3) Plan for statewide CIL/Youth Leadership Summit

**Resources Needed:** CILs, SILC resource plan of up to \$5,000 to support CIL/Youth Leadership Summit

Funding Sources: Part B, Part C, state funds, SILC resource plan

<u>Objective 1.2 From Public Comment on Personal Care Attendants (PCA) Advocacy:</u> People with disabilities have access to a strong network of quality Personal Care Attendants (PCA) to assist them in gaining and retaining as much independence as they choose.

Lead Organization(s): Disability Network Wayne County, CILs, SILC

Time Frame: 10/01/2020 - 09/30/2023

#### **Measurable Indicators:**

- 1) Increase in PCA wages
- 2) Increase in the # state agencies/partners that collaborate with IL Network on PCA issues
- 3) Decrease in # of vacant PCA positions statewide

Geographic Scope: Statewide

**Target Year 3:** 20% increase in PCA wages; 5% increase in IL network partners; 10% decrease in vacant PCA positions

**Targets Years 1-2:** Establish baselines for PCA wages, # of IL network partners, and # of vacant PCA positions

Resources Needed: CIL staff, SILC staff, Council members, people with disabilities

Funding Sources: Part B, Part C, state funds

Objective 1.3 Carried Over from Last SPIL and From Public Comment on Emergency Preparedness: People with disabilities and communities are prepared for emergency situations.

**Lead Organization(s):** CILs, SILC

**Time Frame:** 10/01/2020 – 09/30/2023

#### **Measurable Indicators:**

- 1) Increase # of people with disabilities who have registered Smart 911 profiles
- 2) Increase # of state/county emergency plans that include plans for people with disabilities
- 3) Increase # of CIL people with disabilities who complete a personal emergency plan

Geographic Scope: Statewide

#### **Target Year 3:**

- 1) 25% increase in Smart 911 Profiles created
- 2) 100% of state plans include people with disabilities
- 3) 100% of CILs are reporting personal emergency plans created

#### **Targets Years 1-2:**

- 1) Establish Smart 911 profile baseline
- 2) Establish Personal Emergency Plan baseline
- 3) Establish baseline of state/county emergency plans that include plans for people with disabilities

#### **Resources Needed:**

• Data from Smart 911 (Rave) and state/county emergency plans

Funding Sources: Part B, Part C, state funds

Objective 1.4 From Public Comment on Diversity and Inclusion (D&I): All people with disabilities - including people in unserved or underserved populations - are welcomed, respected and actively included in community activities to reduce social isolation.

Lead Organization(s): CILs, SILC, Development Disabilities Council

**Time Frame:** 10/01/2020 - 09/30/2023

#### **Measurable Indicators:**

- 1) To increase outreach to unserved and underserved populations, three CILs will pilot D&I best practices approaches to facilitate engagement of people with disabilities in existing IL practices and activities, modify existing practices and activities to be more meaningful to the populations and create new practices and activities:
  - a. "Best Practices" generated, shared and distributed to SILC and CILs.
- 2) Increase in CIL's trained in Diversity & Inclusion, IL Philosophy & Cultural and Linguistic Competency
  - a. # of CILs participating in the Developmental Disabilities Council's Community of Practice (CoP)
    - i. Increase in knowledge, skills, attitudes and organizational practices based

on individual and organizational assessment processes.

- b. CILs participating in IL Philosophy through the Disability Network Academy (DNA)
- c. CILs participating in Cultural Competency Trainings through DNA
- 3) Increase in people with disabilities expressing inclusion "welcomed, respected & actively included" through SILC Customer Satisfaction Survey
  - a. Survey Instrument Created
  - b. Baseline Established

Geographic Scope: Statewide

#### **Target Year 3:**

- 1) 100% of CILs participate in D&I, IL Philosophy and Cultural Competency pilots/trainings.
- 2) SILC Survey instrument developed and baseline established for people with disabilities

#### **Targets Years 1-2:**

• 1 CIL D&I Pilot created and launched and 5 CILs trained each year of the SPIL

#### **Resources Needed:**

- 1) Developmental Disabilities Council
- 2) Disability Network Academy
- 3) 3 Targeted CIL Champion(s) Staffing and Commitment

#### **Funding Sources:**

• Part B, Part C, state funds

Objective 1.5 Bureau of Services for Blind People IL Services: People who are blind increase their independence through BSBP's provision of Part B IL services. The Michigan Bureau of Services for Blind Persons will facilitate the provision of Independent Living Part B services to people who are blind or visually impaired and who may also have additional disabilities that would inhibit their capacity to maintain their independence and ability to live as independently as possible without the need for transition of their living situation to a more restrictive environment.

Lead Organization(s): BSBP

**Time Frame:** 10/01/2020 – 09/30/2023

#### **Measurable Indicators:**

- 1) The people served who are able to maintain the least restrictive environment will be considered a successful closure and will be measured and reported to the SILC by the Bureau. Increase in # of people who complete their IL goals.
- 2) Capture and report the #'s of people who complete their IL goals designed to enhance the ability to live in the least restrictive environment possible.

Geographic Scope: Statewide

#### **Target Year 3:**

#### **Targets Years 1-2:**

Resources Needed: Part B

**Goal 2:** SILC will be an effective coordinating, monitoring, and evaluating entity for the SPIL.

#### **Objective 2.1**

Michigan SILC will demonstrate operational effectiveness and capability to develop, monitor, and evaluate the SPIL through compliance with all federal indicators and assurances.

Lead Organization(s): SILC

**Time Frame:** 10/01/2020 – 09/30/2023

#### **Measurable Indicators:**

- 1) SILC maintains all written policies and procedures required by federal SILC indicators and maintains SILC training plans for the Council.
- 2) SILC ensures timeliness of the appointment process.
- 3) SILC receives public input into the development of the State Plan for Independent Living in accordance with 45 CFR 1329.17(f) and monitors, reviews and evaluates the State Plan in accordance with 45 CFR 1329.15(a)(2).

Geographic Scope: Statewide

**Target Year 3:** SILC demonstrates compliance with federal assurances and indicators; Results of statewide survey and outreach campaign reported

**Targets Years 1-2:** SILC demonstrates compliance with federal assurances and indicators; Creation and distribution of statewide survey; launching of statewide outreach campaign

**Resources Needed:** SILC resource plan includes \$10,000 for statewide consumer/stakeholder survey; SILC resource plan includes \$40,000 for statewide outreach campaign

Funding Sources: SILC resource plan

#### 1.4 Evaluation

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

All Michigan CIL's use the NetCIL database system for collecting and reporting CIL services and community activities and to produce their annual PPR reports. The CIL databases are electronically merged on a weekly basis and stored on statewide database server maintained by SILC. Identifiable and protected consumer information is stripped from CIL databases before

they are merged on to the statewide database server. The merged databases allow for the extraction of state level CIL PPR data, consumer service data, and community activities data. The merged CIL data on the statewide database is used by the SILC Monitoring Committee to monitor and report progress on SPIL related goals and objectives.

The SILC's SPIL Monitoring Committee will meet on quarterly basis to review the SPIL monitoring report, as compiled monthly by SILC staff, to evaluate the effectiveness of action steps and progress toward SPIL objectives and outcomes based on each objective's measurable indicators. The SILC will review SPIL implementation through a written SPIL report during SILC public business meeting submitted by the SPIL Monitoring Committee to the SILC. CIL directors are kept informed of SPIL progress through the CIL director liaison who is an appointed member of the SILC. CIL directors are regularly invited to all SILC public meetings and offered opportunities to present to the SILC. The public is kept informed of SPIL progress by posting SPIL monitoring reports on SILC's website and through reporting at SILC public meetings.

As the SPIL is implemented, a close partnership with the CIL network will allow for interactions regarding the implementation process, data collection, and opportunities to review SPIL progress. As progress is monitored, SILC will collaboratively evaluate objectives that are not meeting benchmarks, explore reasons for lack of progress and discuss with the CIL Network whether a SPIL amendment is required.

In the second year of the SPIL, SILC, in collaboration with the CIL Network, will design and conduct an independent survey using a third party to gather input to evaluate satisfaction of stakeholders and people with significant disabilities who have participated in the Independent Living services and/or CIL services. Results will be compiled and evaluated by SILC before the end of the second year of the SPIL. Survey results will be taken into consideration when assessing the need for SPIL amendments. In addition, each CIL is contractually obligated to provide their consumer satisfaction data to SILC at minimum annually. At least one SPIL monitoring report will include a compiled report of consumer satisfaction allowing for a comparison with the SILC statewide satisfaction survey results.

To facilitate the SILC's duty to monitor, review, and evaluate the implementation of the State plan, the Michigan IL network agrees to the following performance measures:

Timeline	Goals (copy from section 1.2 above)	Objectives (copy from section 1.3 above)	Data to be collected	Data collection method	Organization primarily responsible for data collection (please check as many as apply)
Throughout 3-	People with	Systems	<ul><li>Increase in</li></ul>	Lead CIL –	DC, SILC
year period	disabilities	Change	number of people	Disability	
	participate in	Advocacy:	with disabilities	Connections	
	all aspects of	People with	who participate in	& Statewide	
	society	disabilities are		database	

	through inclusive and accessible communities	actively engaged in promoting and advancing disability rights through advocacy and leadership initiatives	the CIL Network Legislative Day  Increase in number of CIL Youth Advocacy & Leadership programs  Statewide CIL/Youth Leadership Summit planned and held	Lead CIL – Disability Connections & Statewide database  Lead CIL – Disability Connections & Statewide database	DC, SILC  DC, SILC
Throughout 3- year period		Personal Care Attendants Advocacy: People with disabilities have access to a strong network of quality Personal Care	• Increase in PCA wages	Lead CIL – Disability Network Wayne County, Statewide Database & Legislative monitoring	DNWC, SILC
		Attendants to assist them in gaining and retaining as much independence as they choose	• Increase in the # state agencies/partners that collaborate with IL Network on PCA issues	Lead CIL – Disability Network Wayne County & Statewide database	DNWC, SILC
			• Decrease in # of vacant PCA positions statewide	Lead CIL – Disability Network Wayne County & Michigan Aging and Adult Services Agency/PHI Reports	DNWC, SILC
Throughout 3-		<u>Emergency</u>	• Increase # of	Lead CIL –	DNCA, SILC
year period		<u>Preparedness:</u>	people with	Disability	

	People with disabilities and communities are prepared for emergency situations	disabilities who have registered Smart 911 profiles	Network Capital Area, Statewide database & Rave Technologies	
		• Increase # of state/county emergency plans that include plans for people with disabilities	Lead CIL – Disability Network Capital Area & Survey of emergency plans	DNCA, SILC
		• Increase # of CIL people with disabilities who complete a personal emergency plan	Lead CIL – Disability Network Capital Area & Statewide database	DNCA, SILC
Throughout 3- year period	Diversity and Inclusion: All people with disabilities - including people in unserved or underserved populations - are welcomed, respected and actively included in IL activities to reduce social isolation.	To increase outreach to unserved and underserved populations, three CILs will pilot D&I best practices approaches to facilitate engagement of people with disabilities in existing IL practices and activities, modify existing practices and activities to be more meaningful to the populations and create new practices and activities.  • "Best Practices" generated, shared and distributed to	Lead CIL – Disability Network	CIL Champions of PILOT Projects
		SILC and CILs.	Flint	

Throughout 3- year period			•	# of CILs participating in DD Council CoP	Lead CIL – Disability Network Flint & DD Council Report	CIL Champion
Throughout 3- year period			•	CILs participating in IL Philosophy, & Cultural Competency Trainings	Lead CIL – Disability Network Flint & Disability Network Academy	CIL Champion
Throughout 3- year period  Throughout 3- year period		Bureau of Services for Blind People IL Services: People who are blind increase their independence through BSBP's provision of Part B IL services.	•	The people served who are able to maintain the least restrictive environment will be considered a successful closure and will be measured and reported to the SILC by the Bureau. Increase in # of people with disabilities who complete their IL goals. Capture and report the #'s of people with disabilities who complete their IL goals designed to enhance the ability to live in the least restrictive environment possible.	BSBP database BSBP database	BSBP
Throughout 3- year period	SILC will be an effective coordinating,	Michigan SILC will demonstrate	•	SILC maintains all written policies and	SILC self- assessment	SILC

Throughout 3- year period Throughout 3- year period	monitoring, and evaluating entity for the SPIL	operational effectiveness and capability to develop, monitor, and evaluate the SPIL through compliance with all federal indicators and assurances.	indicators and maintains SILC training plans for the Council.  • SILC ensures timeliness of the sindicators and sample sindicators and sindica	
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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): 2021 - 2023								
<b>Sources</b>	<b>Projected F</b>	Projected Funding Amounts and Uses						
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Administrative costs (applies only to Part B funding)			
<b>Title VII Funds</b>								
Chapter 1, Part B (including state match)	110,018	178,779 (BSBP)	295,595					
Chapter 1, Part C			2,233,678					

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Other Federal				
Funds				
Sec. 101(a)(18) of	269,503			
the Act				
(Innovation and				
Expansion)				
Social Security		_	2,300,000	
Reimbursement				
Other			CARES Act	
			2,159,087	
Non-Federal				
Funds				
State Funds	70,000		2,000,000	229,500
	State IL		State GF/GP	PASREP
	line item			
Other		•		

\$2,299,500 is associated with state match.

Description of financial plan narrative.

Part B and Part C funds are utilized to support the general operations of the Centers for Independent Living to provide independent living services and advance the objectives in the SPIL. Advancing the objectives of the SPIL will be a collaborative effort between the SILC and the CIL Network, whereas SILC will be utilizing Part B funds to help advance the collaboration. Part B funds are utilized for three purposes: 1) 35% is allocated to the Bureau of Services for Blind Persons (BSBP) to provide direct IL Services 2) 15% is used for the operations of SILC and 3) 50% is granted to the CILs by the DSE for general operations.

Annually, the DSE, SILC, and the CILs develop coordinated funding plans for:

- 1. Use of Federal and State funds available for IL Programs and services.
- 2. Development of private sector resources for IL programs supports and services.

Annually, state and federal funding (composed of Title VII Part B, Social Security Reimbursement, and State tax funds) is distributed by the DSE to the CILs through state grants according to the following agreed upon funding priorities:

It is Michigan's intent that all CILs receive an equal amount of available Part B and Part C funds. If the Part C funds are not distributed equally, Part B funds will first be used to provide equality to the extent possible. For example, if 5 CILs receive \$120,000 in Part C funds and 10 CILs receive \$110,000, \$10,000 in Part B funds will be granted to each of the 10 CILs to equal \$120,000. Any remaining Part B funds would be divided equally amongst all CILs.

Current federal Part B, Part C, and state appropriations total \$6,830,268 and include Social Security Reimbursement and state tax dollars for independent living core services. It is Michigan's intent to distribute these funds for core services to each CIL as follows: (Note: The below amounts are based on the FY 2020 funding appropriation of Part B, Part C and state funding. The amount may change before final submission of SPIL based on FY 2021 State of Michigan funding appropriations)

**FY 2020 CIL Funding** 

CIL Name	State GF/GP	Social Security	Title VII Part B	TOTAL State IL Core	Title VII Part C	Total State IL Core and Part C	CARES Act
The Disability Network (Flint)	145,626	187,924	25,036	358,586	142,888	501,474	138,117
Disability Network of Northern Michigan	101,951	104,494	10,273	216,718	159,573	376,291	154,244
Disability Network Capital Area	157,980	201,651	25,036	384,667	142,888	527,555	138,117
Disability Connections - Jackson	52,382	43,168	10,273	105,823	159,573	265,396	154,244
Disability Network Southwest Michigan	177,699	225,741	25,036	428,476	159,574	588,050	154,245
Disability Advocates of Kent County	146,637	170,695	25,036	342,368	142,888	485,256	138,117
Disability Network Oakland & Macomb	216,713	236,919	25,036	478,668	142,889	621,557	138,117
Superior Alliance for Independent Living	100,092	92,710	18,906	211,708	149,815	361,523	144,812
Disability Network/Mid- Michigan	148,811	165,087	25,036	338,934	142,889	481,823	138,117
Disability Connections - West Michigan	65,100	62,475	10,273	137,848	159,573	297,421	154,244
Disability Network/Lakeshore	120,826	150,639	25,036	296,501	142,888	439,389	138,117
Blue Water Center for Independent Living	152,876	195,664	25,036	374,574	142,889	517,463	138,117
Disability Network SW Michigan (Berrien/Cass)	44,542	36,489	10,273	91,304	142,889	234,193	138,117
Ann Arbor Center for Independent Living	180,847	233,124	25,036	439,007	142,889	581,896	138,118
Disability Network- Detroit/Wayne	187,916	193,219	10,273	391,408	159,573	550,981	154,244
Total	\$1,999,998	\$2,299,999	\$295,595	\$4,596,590	\$2,233,678	\$6,830,268	\$2,159,087

If there is a decrease in funds for core services below \$6,830,268, the decrease will be

distributed across the CIL network proportional to the decrease. For example, if the amount of the reduction is 10% of the total, each CIL will receive a 10% reduction. If there is an *increase* in funds for core services above \$6,830,268, the increase will be distributed using a formula of 50% equality and 50% equity. Equality is determined by dividing the funds by the number of CILs. Equity will be determined based upon a formula that is derived using population, geography, and poverty rate developed by the CILs. If available resources are not adequate to achieve the above priorities, SILC will consult and collaborate with the CIL network to determine a distribution that is simple, fair, and efficient.

#### 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 Part B (check to indicate yes)	Provided using other funds (check to indicate yes; do not list the other funds)	Entity that provides (specify CIL, DSE, or the other entity)
Core Independent Living Services, as follows:			
- Information and referral	Yes	Yes	CILs, DSE
- IL skills training	Yes	Yes	CILs
<ul><li>Peer counseling</li><li>Individual and systems advocacy</li><li>Transition services including:</li></ul>			
<ul> <li>Transition from nursing homes &amp; other institutions</li> </ul>	Yes	Yes	CILs
<ul> <li>Diversion from institutions</li> </ul>	Yes	Yes	CILs
<ul> <li>Transition of youth (who were eligible for an IEP) to post-secondary life</li> </ul>	Yes	Yes	CILs
Counseling services, including psychological, psychotherapeutic, and related services	Yes	Yes	CILs
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, people with disabilities) Note: CILs are not allowed to own or operate housing.	Yes	Yes	CILs

Table 2.1A: Independent living services	Provided using Part B (check to	Provided using other funds (check	Entity that provides (specify CIL,
	indicate yes)	to indicate yes; do not list the other	DSE, or the other entity)
D 1 171 d 1 1	37	funds)	CH DGE
Rehabilitation technology	Yes	Yes	CILs, DSE
Mobility training	Yes	Yes	CILs
Services and training for people with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	Yes	Yes	CILs, DSE
Personal assistance services, including attendant care and the training of personnel providing such services	Yes	Yes	CILs
Surveys, directories, and other activities to identify appropriate housing, recreation opportunities, and accessible transportation, and other support services	Yes	Yes	CILs
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other people with disabilities who have traditionally been unserved or underserved by programs under this Act	Yes	Yes	CILs, DSE
Education and training necessary for living in the community and participating in community activities	Yes	Yes	CILs
Supported living	Yes	Yes	CILs
Transportation, including referral and assistance for such transportation	Yes	Yes	CILs, DSE
Physical rehabilitation	No	No	
Therapeutic treatment	Yes	Yes	CILs, DSE
Provision of needed prostheses and other appliances and devices	Yes	Yes	CILs, DSE
Individual and group social and recreational services	Yes	Yes	CILs
Training to develop skills specifically designed for youths who are people with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	Yes	Yes	CILs, DSE
Services for children	Yes	Yes	CILs

Table 2.1A: Independent living services	Provided using Part B (check to indicate yes)	Provided using other funds (check to indicate yes; do not list the other funds)	Entity that provides (specify CIL, DSE, or the other entity)
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 people with disabilities	Yes	Yes	CILs, DSE
Appropriate preventive services to decrease the need of people with significant disabilities for similar services in the future	Yes	Yes	CILs, DSE
Community awareness programs to enhance the understanding and integration into society of people with disabilities	Yes	Yes	CILs, DSE
Such other services as may be necessary and not inconsistent with the Act	Yes	Yes	CILs, DSE

#### 2.2 Outreach

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

In Michigan's IL Network, unserved populations are defined as people with disabilities who live in counties that are not associated with a Part C funded CIL service area. Out of Michigan's 83 counties, nine counties are unserved and are primarily located in the mid-west and northeast areas of lower Michigan. Michigan's counties that are unserved by the IL network through Part B and Part C funding are Ionia, Mecosta, Montcalm, Osceola, Alcona, Iosco, Ogemaw, Roscommon, and Lake counties. These counties are served with state funds.

Michigan's underserved populations are defined as people with disabilities who live in CIL service areas where the CIL's core funding does not meet the Michigan CIL prototype's minimum IL core funding level of 50% of the CIL's total budget which is further described in Section 3.2 "Expansion of the Network." When analyzing underserved disability populations by county based on the Michigan CIL prototype, all counties affiliated with Michigan CILs are underserved. The Michigan CIL service areas that are the most underserved in the prototype based on core funding levels are Detroit, Oakland/Macomb, mid-Michigan, northern Michigan and the Upper Peninsula (see table in Section 3.2).

The outreach plan will be spearheaded by SILC and will promote IL/CIL service awareness to unserved and underserved disability populations in all Michigan counties based on the CIL prototype minimum funding table with an additional focus on the CIL identified populations in

SPIL Goal 1, Objective 1.4 Diversity and Inclusion.

The IL/CIL service outreach awareness campaign, led by SILC, will be designed in partnership with the CIL Network. Statewide outreach methods will include development of accessible informational and educational materials about IL and CIL service awareness disseminated across multiple accessible platforms including social media, websites, and in key partner locations where targeted populations receive goods and services. The awareness campaign will include the development of a targeted outreach social media presence, development of community presentations, materials, talking points, partnering with disability related community service agencies and groups in targeted areas, and evaluation of outreach efforts. SILC will dedicate SPIL resources to third party outreach services to ensure the successful launch and execution of the outreach campaign. The CIL diversity and inclusion PILOTS outcomes will shared with the IL Network and statewide partners.

#### 2.3 Coordination

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

Michigan's partners coordinate services and strive to avoid duplication through multi-level interactions and collaborations. This is also accomplished through representation on and presentations to the Council, as well as input during SPIL formulation and on-going evaluation process. Through effective communication and relationship development, the SILC and the CILs strive to ensure that none of the services planned or provided through the SPIL are duplicated with special education services, vocational rehabilitation services, public health, mental health, housing, transportation, Veterans programs, and Medicaid services. Services are designed to enhance the service offerings for people with significant disabilities.

SILC's Chair, or designee, is a Governor appointed member of the Michigan Council for Rehabilitation Services (MCRS) in accordance with WIOA which allows for the facilitation of ongoing presentations to both councils on missions, sharing of activities, collaboration on improvement of statewide employment outcomes for people with disabilities, and sharing of progress on service delivery and SPIL progress.

SILC membership includes the following Ex Officio members: the director or designee of Michigan Rehabilitation Services (DSE), the director of designee of the Bureau of Services for Blind Persons (BSBP), a representative from the Michigan Department of Civil Rights, designated by the Director of the Michigan Department of Civil Rights, who works in the Division on Deaf, Deafblind and Hard of Hearing; a representative from the Michigan Department Education, designated by the Superintendent of Public Instruction, who works in the Office of Special Education; and a representative from the Department of Health and Human Services, designated by the Director of the Department of Health and Human Services, with knowledge of all programs within the Department of Health and Human Services impacting people with disabilities. Ex Officio membership on SILC allows for continuous state level collaboration across multiple state departments that provide services to people with disabilities.

SILC will continue partnering with the Developmental Disabilities Council to bring cultural and

linguistic competency and systems change training to the CIL network in terms of providing services to the DD population. Part B funds are used by the Bureau of Services for Blind Persons (BSBP) to provide IL services to people who are blind or visually impaired and is the most appropriate entity to provide these specialized IL services. BSBP coordinates with IL Network on services to BSBP consumers. With BSBP's loss of the ability to provide homemaker services under WIOA, there is an increased need for coordination of services between BSBP and the IL Network to support people with disabilities in gaining and maintaining community-based living. The CILs will partner with the Michigan Disability Rights Coalition on the youth advocacy and leadership initiative.

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

#### 3.1 Existing Centers

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

Michigan's Network of CILs is comprised of fifteen Centers for Independent Living all of whom receive Title VII Part C funds. Each CIL is required to be in compliance with the Rehabilitation Act Section 725, CIL Standards and Assurances, in order to retain eligibility to be included in the SPIL Network of CILs. They are:

Legal name	Counties	Funding	Oversight process	Oversight	SPIL
	served	source(s)		entity	Signatory
					(yes/no)
Ann Arbor Center for	Livingston	Part B	DSE determines oversight	DSE, ACL	Yes
Independent Living	Monroe	State GF/GP	process in accordance with	DSE	
	Washtenaw	Social Security	Section 4.3 of the SPIL	DSE	
		Part C	and state and federal	ACL	
		CARES Act	regulations/requirements	ACL	
			through CIL contracts;		
			CILs submit CIL PPR to		
			DSE and ACL		
Blue Water Center for	St. Clair	Part B	DSE determines oversight	DSE, ACL	Yes
Independent Living	Sanilac	State GF/GP	process in accordance with	DSE	
	Huron	Social Security	Section 4.3 of the SPIL	DSE	
	Lapeer	Part C	and state and federal	ACL	
	Tuscola	CARES Act	regulations/requirements	ACL	
			through CIL contracts;		
			CILs submit CIL PPR to		
			DSE and ACL		
Disability Network Capital	Clinton	Part B	DSE determines oversight	DSE, ACL	Yes
Area	Eaton	State GF/GP	process in accordance with	DSE	
	Ingham	Social Security	Section 4.3 of the SPIL	DSE	
	Shiawassee	Part C	and state and federal	ACL	
		CARES Act	regulations/requirements	ACL	

Disability Advocates of	Kent	Part B	through CIL contracts; CILs submit CIL PPR to DSE and ACL DSE determines oversight	DSE, ACL	Yes
Kent County	Kent	State GF/GP Social Security Part C CARES Act	process in accordance with Section 4.3 of the SPIL and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	DSE, ACL DSE DSE ACL ACL	
Disability Network Lakeshore	Allegan Ottawa	Part B State GF/GP Social Security Part C CARES Act	DSE determines oversight process in accordance with Section 4.3 of the SPIL and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	DSE, ACL DSE DSE ACL ACL	Yes
Disability Network Mid- Michigan	Arenac Bay Clare Gladwin Gratiot Isabella Midland Saginaw	Part B State GF/GP Social Security Part C CARES Act	DSE determines oversight process in accordance with Section 4.3 of the SPIL and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	DSE, ACL DSE DSE ACL ACL	Yes
Disability Network Oakland and Macomb	Macomb Oakland	Part B State GF/GP Social Security Part C CARES Act	DSE determines oversight process in accordance with Section 4.3 of the SPIL and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	DSE, ACL DSE DSE ACL ACL	Yes
Disability Network Southwest Michigan	Barry Branch Calhoun Kalamazoo St. Joseph Van Buren	Part B State GF/GP Social Security Part C CARES Act	DSE determines oversight process in accordance with Section 4.3 of the SPIL and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	DSE, ACL DSE DSE ACL ACL	Yes
The Disability Network	Genesee	Part B State GF/GP Social Security	DSE determines oversight process in accordance with Section 4.3 of the SPIL	DSE, ACL DSE DSE	Yes

		Part C CARES Act	and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	ACL ACL	
Superior Alliance for Independent Living	Alger Baraga Chippewa Delta Dickinson Gogebic Houghton Iron Keweenaw Luce Mackinac Marquette Menomineee Ontonagon Schoolcraft	Part B State GF/GP Social Security Part C CARES Act	DSE determines oversight process in accordance with Section 4.3 of the SPIL and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	DSE, ACL DSE DSE ACL ACL	Yes
Disability Network Southwest Michigan Berrien and Cass	Berrien Cass	Part B State GF/GP Social Security Part C CARES Act	DSE determines oversight process in accordance with Section 4.3 of the SPIL and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	DSE, ACL DSE DSE ACL ACL	Yes
Disability Network Northern Michigan	Antrim Benzie Charlevoix Emmitt Grand Traverse Kalkaska Leelanau Manistee Missaukee Wexford Alpena Cheboygan Crawford Montmorency Oscoda Otego Presque Isle	Part B State GF/GP Social Security Part C CARES Act	DSE determines oversight process in accordance with Section 4.3 of the SPIL and state and federal regulations/requirements through CIL contracts; CILs submit CIL PPR to DSE and ACL	DSE, ACL DSE DSE ACL ACL	Yes

disability Connections Inc.	Hillsdale	Part B	DSE determines oversight	DSE, ACL	Yes
	Jackson	State GF/GP	process in accordance with	DSE	
	Lenawee	Social Security	Section 4.3 of the SPIL	DSE	
		Part C	and state and federal	ACL	
		CARES Act	regulations/requirements	ACL	
			through CIL contracts;		
			CILs submit CIL PPR to		
			DSE and ACL		
Disability Network West	Mason	Part B	DSE determines oversight	DSE, ACL	Yes
Michigan	Muskegon	State GF/GP	process in accordance with	DSE	
	Newaygo	Social Security	Section 4.3 of the SPIL	DSE	
	Oceana	Part C	and state and federal	ACL	
		CARES Act	regulations/requirements	ACL	
			through CIL contracts;		
			CILs submit CIL PPR to		
			DSE and ACL		
Disability Network Wayne	Wayne	Part B	DSE determines oversight	DSE, ACL	Yes
County Detroit		State GF/GP	process in accordance with	DSE	
		Social Security	Section 4.3 of the SPIL	DSE	
		Part C	and state and federal	ACL	
		CARES Act	regulations/requirements	ACL	
			through CIL contracts;		
			CILs submit CIL PPR to		
			DSE and ACL		

The following nine counties are not federally affiliated with a Michigan CIL and are not served with Part C funding, but they are served with state funding: Ionia, Mecosta, Montcalm, Osceola, Alcona, Iosco, Ogemaw, Roscommon and Lake counties.

CARES Act funding will be used by the CIL network in accordance with federal guidelines to provide consumer services in response to consumer needs resulting from COVID-19 including CIL operational expenses, CIL capacity building, technology enhancements for remote service delivery, COVID-19 related consumer supplies, and employee salaries, wages, and leave.

#### 3.2 Expansion and Adjustment of Network

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

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.

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

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

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

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

The Michigan CIL prototype was developed by the CIL network to provide a framework for the plan, priorities and methodology for distributing funds to build realistic, practical baseline capacity and statewideness of a Network of CILs that achieve the federal IL program standards and indicators. It is based on sufficient operational funding for the CIL to have the capacity to address the needs of all communities within its service area. The model was collaboratively developed to provide a flexible short- and long-range planning framework that can be used as model in assessing, comparing and distributing funding across the state.

Continuing assessment of the existing CIL Network has led to the realization that a more comprehensive planning framework is needed. Even the smallest of the CILs currently report they have communities within their service areas that they cannot appropriately serve. Development of a statewide CIL Network that would achieve its intended purposes requires a planning framework that needs to reflect a realistic and practical baseline of operational funding. This would be sufficient operational funding for the CIL to have the capacity to address the independent living needs of all communities within its service area.

The Michigan CIL Prototype has been developed to meet this need. It provides a flexible planning framework that can be used as a template in assessing and comparing the equity of funding across the state. By identifying a CIL profile for a conceptually defined population and geographic area, it can provide a starting point for the process of analyzing local community need and developing a unique CIL with the capacity to address the needs of the communities within its particular service area.

Development of the Michigan CIL Prototype: The Michigan CIL prototype was developed as a basis for the national CIL standards and indicators, as well as the many applicable federal and state grant requirements and assurances. It also includes the generally accepted organizational, financial, and planning practices incorporated by reference in the standards and assurances. Conscious effort was made to build the prototype on the basis of practices that Michigan CILs have found to be effective and efficient. In addition, the commitment was to focus explicitly on what is needed for a realistic and practical baseline of operational capacity. In practice, each CIL must generate its own plans with each community, which can be expected to result in a unique organization that does not directly emulate the prototype. This document is not intended to be a standard to achieve, but rather a model for equitable CIL funding.

#### Planning Assumptions:

• Service Areas: The conceptual prototype is predicated on a CIL with a population of 250,000 people in a service area of 4,000 square miles. These are long-standing population and area figures commonly used in identifying CIL Core Funding levels.

Although the figures are normally used to express minimum expectations (i.e., "250,000 people or 4,000 square miles"), they have here been combined to provide a defined service setting for the planning prototype. For planning purposes, the prototype service area is considered to include a mix of both urban and rural areas, including a diverse mix of disability, ethnic, cultural, age, religious, and other characteristics.

- Personnel: It is assumed that CILs will need 18 full-time staff, representing between 60-70% of the total CIL budget, to provide essential operations and service infrastructure to:
  - Engage in effective community development/systems change activities;
  - Enhance individual opportunities for self-determination;
  - Establish stable, accountable, and effective operational infrastructure;
  - Secure and apply current technology;
  - Raise other revenue and mobilize resources within the community.
- Estimated Revenue: Engaging in the above listed activities will require a minimum of \$1.5 million. It has been determined that a realistic projection of fund sources was for one-half (50%) of the prototype CIL's funding to come from federal and state Core funding, one-quarter (25%) from a mix of vocational rehabilitation (VR) funding, and the remaining one-quarter (25%) from other funding sources, such as grants, contracts, resource development and other fee-for-service.

50% Core Funds (\$750,000) 25% VR Fee for Service (\$325,000) 25% Other Revenue (\$325,000)

• Estimated Expense Allocation: The funds would be allocated in the following a standardized distribution:

65% Personnel7.7% Occupancy4.3% Communications7.3% Contractual15.7% Other operational costs

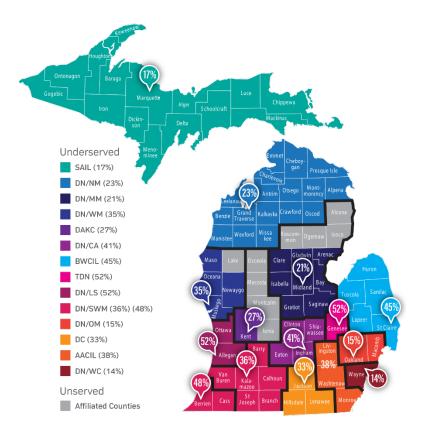
Long Range Funding Targets: The resulting prototype CIL budget can be used as a template to compute long-range funding targets for the Michigan CIL Network to serve PWD. The computation applies the following logic: "If the prototype CIL requires a total of \$750,000 in Core Funding to serve a population of 250,000 people within an area of 4,000 square miles, how much does a CIL require to serve a population of (an identified number of people) within an area of (an identified number of square miles)?" After consideration of several different possibilities, it was decided that basing 40% of the funding on geographic area, and 60% on population, appeared to produce the most equitable results across the full statewide CIL Network. The resulting computation shows that the prototype CIL requires combined federal and state Core Funding of \$75.00 per square mile and \$1.80 per person. Using these figures to compute comparable Core Funding for the full Michigan IL/CIL Network results in a long-term statewide Core Funding target of \$\$25,590,097

Analysis of Current Core Funding Levels: The long-term funding targets can be used in

analyzing current Core Funding levels. For example, analysis of the statewide combined federal and state Core Funding for FY 2020 shows that it is approximately 27% (\$6,830,268/\$25,590,097) of the long-term funding targets. Individual CIL comparisons range from about 14% to 52% of the long-term funding targets. In accord with established priorities, as additional Core Funding becomes available, it will be allocated in ways that reduce funding disparities and increase the equity of Core Funding across the state, consistent with the long-term funding targets.

CIL	2020 Core as % of target
Ann Arbor CIL	38%
Blue Water CIL (Port Huron)	45%
DN/Capital Area (Lansing)	41%
DAKC (Grand Rapids)	27%
DN/West Michigan (Muskegon)	35%
Disability Connections (Jackson)	33%
DN/Lakeshore (Holland)	52%
DN Oakland & Macomb *	15%
DN Wayne (Detroit) *	14%
DN/Mid-Michigan (Midland) *	21%
DN/NM (Traverse City) *	23%
DN/SWM (Benton Harbor)	48%
DNSWM (Kalamazoo)	36%
SAIL (Marquette) *	17%
TDN (Flint)	52%
TOTAL	27%

<sup>\*</sup> Note: CIL's with the least percentage of core resources needed to serve community



Michigan's underserved populations are defined as people with disabilities who live in CIL service areas where the CIL's core funding does not meet the prototype's minimum IL core funding level of 50% of the CIL's total budget. When analyzing underserved disability populations by county based on the Michigan CIL prototype, all counties affiliated with Michigan CILs are underserved. However, the Michigan CIL service areas that are the most underserved are Detroit, Oakland/Macomb, mid-Michigan, northern Michigan and the Upper Peninsula.

<u>Future Use and Updating the Prototype</u>: The Michigan CIL prototype seeks to point to future possibilities. An attempt has been made to outline what would be required in the long term to establish a fully funded statewide CIL Network that would make effective IL supports and services readily available to all Michigan citizens. It reflects what the CIL Network believes is needed, not what would be nice to have or what would be possible to get by with.

Presented in this plan in its initial formulation, the Michigan CIL Prototype has been developed as a flexible planning framework that provides a uniform template for statewide planning and a starting point for individualized local planning. In the Prototype, the CILs have described and projected, from their collective experience, the staffing and other resources believed necessary to establish CIL presence in each community across the state. There is an agreement that, even in its initial formulation, the Michigan CIL Prototype provides a useful tool for systematically analyzing current levels of Core Funding, negotiating plans for long-term development of the statewide CIL Network, and guiding actions to increase the equity of CIL funding in Michigan.

<u>Distribution of Funds:</u> It is Michigan's intent that all CILs receive an equal amount of available

Part B and Part C funds. If the Part C funds are not distributed equally, Part B funds will first be used to provide equality to the extent possible. For example, if 5 CILs receive \$120,000 in Part C funds and 10 CILs receive \$110,000, \$10,000 in Part B funds will be granted to each of the 10 CILs to equal \$120,000. Any remaining Part B funds would be divided equally amongst all CILs.

Relinquished Funds: In the case where a Part C center's grant is relinquished or terminated, the CIL Network in partnership with SILC would evaluate the options for re-establishing a CIL in that same service area. Options may include an already established CIL temporarily providing CIL services until public hearings can be held to obtain feedback from people with disabilities and other stakeholders about the desires of the community. Based upon the feedback, the CIL Network in coordination with SILC and the Administration on Community Living will determine how to proceed. A likely scenario would be to issue a Request For Proposals (RFP) to seek an eligible agency to provide satisfactory assurances consistent with 45 CFR 366.50 to reestablish a Part C funded CIL.

In the event a Title VII, Subchapter B or C funded Center should close or forfeit/lose funding, the Michigan IL Network will make a formal request to the Administration on Community Living on the most beneficial use of funds for the network of Centers for Independent Living in Michigan. The Michigan IL Network believes the opportunity to provide the Administration on Community Living input in this decision increases consumer control and upholds the Independent Living Philosophy and the intent of this Plan, while giving the ability to best respond to the situation and create the best outcome for people with disabilities in Michigan. The IL Network will choose one of the following four options:

- 1. A redistribution of funds for 180 days to an existing Center to provide IL services to the defined community/area of relinquished funds.
- 2. Reissuing a new grant competition for the same territory,
- 3. Issuing a new competition for a new grant in a similar region with possible additions or reductions of counties based on the award amount,
- 4. A redistribution of funds to existing Centers that follows the distribution as established by this Plan.

<u>Unserved/Underserved:</u> In Michigan's IL Network, unserved populations are defined as people with disabilities who live in counties that are not associated with a Part C funded CIL's service area. Out of Michigan's 83 counties, nine counties are unserved and are primarily located in the mid-west and northeast areas of lower Michigan. Michigan's counties that are unserved by the IL network through Part B and Part C funding are Ionia, Mecosta, Montcalm, Osceola, Alcona, Iosco, Ogemaw, Roscommon, and Lake counties. These counties are served with state funds.

<u>Funding Reductions</u>: In the case where funds are cut or reduced, after the initial equitable and equal distribution of Part B and Part C funds to CILs in accordance with the formula, cuts or reductions will be distributed proportionally among all CILs.

<u>Service Area Changes, Expansion or Adjustments:</u> In the case of a plan for changes to Center service areas and/or funding levels to accommodate expansion and/or adjustment of the

Network, Michigan is not currently considering expanding its network based on the CIL funding prototype. Current Part C CIL service areas within the state cover every county except nine which are covered by state funds. Should additional federal funding become available, the funds would be allocated to the existing network. The Michigan funding formula is based upon geography, population and poverty rate. Therefore, both rural and urban underserved populations take priority with new state funds.

<u>One-Time Funding:</u> In the case where one-time funding becomes available, after the initial equitable and equal distribution of Part B and Part C funds to CILs in accordance with the formula, additional funds will be distributed equally among all CILs.

<u>Carryover Part B Funds:</u> Beginning in FY 2021, the DSE will initiate a process to distribute Part B funding as contract amendments after the funding is awarded. This will allow for accurate accounting of all Part B funding including carry-over amounts. If carry over exists from the previous fiscal year, the DSE will add the carry over to the contract amendments divided equally amongst all eligible CILs per section 1.5 of the SPIL.

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

<u>Michigan Rehabilitation Services</u> will serve as the entity in <u>Michigan</u> to receive, administer, and account for funds made available to the state under Title VII, Chapter 1, Part B of the Act on behalf of the State. (Sec. 704(c))

#### 4.1 DSE Responsibilities

- (1) receive, account for, and disburse funds received by the State under this chapter based on the plan;
- (2) provide administrative support services for a program under Part B, and a program under Part C in a case in which the program is administered by the State under section 723;
- (3) keep such records and afford such access to such records as the Administrator finds to be necessary with respect to the programs;
- (4) submit such additional information or provide such assurances as the Administrator may require with respect to the programs; and
- (5) retain not more than 5 percent of the funds received by the State for any fiscal year under Part B. for the performance of the services outlined in paragraphs (1) through (4).

#### 4.2 Grant Process & Distribution of Funds

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

The Program Enhancement Division (PED) of Michigan Rehabilitation Services (DSE) has created a process for soliciting continuation funding proposals for both subchapter B and State of Michigan Funding. All proposals are submitted in a format approved by the department. Each submitted proposal must contain adherence to all contract stipulations, state/federal requirements and include both a workplan with measurable targets and a budget which is reasonable, allowable and allocable.

MRS contract and financial staff will review each proposal on the following:

- Evaluation of a comprehensive risk assessment which includes a scoring matrix ranking based upon review of submitted annual audit reports, adherence to all report deadlines, financial solvency of the grantee, and previous work plan performance.
- Review of grantee submitted financial documentation to ensure budgeting of funding is reasonable, allowable and applicable per 2 CFR 200 requirements.
- Review and approval of grantee measurable work targets as part of the submitted work plan.

Proposals for new awards will be processed based upon the same method, with the exception of evaluation, to determine if the proposal needs to go out for public bidding. If a new proposal requires a public bidding, a review team will be created comprised of DSE, SILC and other required membership.

Grant agreements between MRS and the individual CILs provide certification of a wide array of applicable grant requirements and assurances, including fiscal control and fund source accounting assurances. Adherence by the CILs to this certification is verified through MRS review of the CILs annual certified financial reviews/audits, including follow-up on CIL response to significant recommendations made by the financial reviewer/auditor.

For its state IL program, the Michigan Bureau of Services for Blind People (BSBP) undertakes fiscal control and fund accounting requirements which are in accord with federal, state, and departmental policies and procedures.

4.3 Oversight Process for Part B Funds
The oversight process to be followed by the DSE.

The Program Enhancement Division (PED) of Michigan Rehabilitation Services (DSE) is the oversight division for both Subchapter B and funding allocated by the State of Michigan for Independent Living services. The oversite process is based upon 2 CFR 200 and Michigan law. These processes include:

#### Post-Award:

- All requests for reimbursement are reviewed and placed into a financial dashboard. PED staff then verify to ensure all costs are not out of normal spending patterns and are not beyond contracted amounts. Any questions/discrepancies are addressed prior to payment.
- Monthly, staff from PED review all supporting documentation for a grantee's reimbursement request. CIL reviews are conducted by the PED monthly with one CIL being chosen per month for review and their monthly financial statements for review are chosen at random from previously submitted statements of expenditures. The intent of the review is to ensure all reimbursed expenses adhere to 2 CFR 200 requirements. If areas of non-compliance are discovered, a corrective action plan will be initiated.
- Quarterly, PED staff will perform an on-site monitoring visit of a grantee receiving subchapter B or state funding. This review is conducted using both the ACL on-site guide for program and financial adherence and the PED on-site checklist for state

- funding. A report is generated for the grantee and presented to their board of directors. If areas of non-compliance are discovered, a corrective action plan will be initiated.
- Quarterly, PED staff will review grantee work plan targets to ensure contracted services are being provided. Any deviation from the approved contract will be addressed with the grantee. If necessary, a corrective action plan may be initiated.

The DSE maintains records that fully disclose and document all grant information. In addition, all Michigan CILs sign grant agreements accepting responsibility for maintenance of and access to the cited records which fully disclose and document the information listed in 45 CFR 364.35

CILs and SILC sign grant agreements with MRS assuring they will submit annual performance and financial reports and their annual PPR reports to the Administration on Community Living

The Requirements and Assurances signed by CILs and SILC for their MRS grants certify that access will be provided to any duly authorized DSE representative for the purpose of conducting audits, examinations and compliance reviews the information listed in 45 CFR 364.37.

4.4 Administration and Staffing

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

The Designated State Entity (DSE) is Michigan Rehabilitation Services and, as such, is responsible for the administration of the Title VII, Part B funds. Michigan Rehabilitation Services (MRS) has the responsibility of administering state funds, Social Security Reimbursement Funds, and Title VII, Part B funds through contracts with the Centers for Independent Living.

## Explain how the DSE will demonstrate that not more than 5% of Part B appropriations (including state match) will be used on administrative costs:

MRS, acting as the DSE for Michigan currently does not keep any of the subchapter B funding for administration of the Independent Living Program, but reserves the right to retain up to 5% of the subchapter B funding as described in Section 704 c(5) of the Act amended by WIOA. Demonstration of the amounts is documented via the annual PPR submission showing the distribution of Part B funding.

## When DSE employees serve as staff to the SILC, describe how the SILC will hire, fire and supervise such staff:

The DSE does not provide direct staff support to the SILC. SILC is being staffed by employees hired by the Council through its non-profit corporation. The DSE primarily provides administrative support in the form of grant technical assistance, grant monitoring and administering state and federal resources for SILC and the CILs.

Describe how the DSE will assure that such staff will not be assigned to other projects/activities that would create a conflict of interest with their SILC responsibilities: The DSE does not provide direct staff support to the SILC, which avoids the creation of a conflict of interest with the DSE. The MiSILC corporation can hire/fire/supervise its own staff who are directly responsible to the SILC. Additionally, SILC council members are vetted for conflict of interest through the appointment process and annual conflict of interest disclosures.

#### 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

## State law, regulation, rule, or policy relating to the DSE's administration or operation of IL programs:

Through the CIL contracts with the DSE, all CIL grantees are required to utilize the NetCIL Database system to record services, community activities and the funding sources which apply to each. Personal Activity Reports (PARs), created by the database system, are required for each CIL and are submitted for review in Section 4.3 post award compliance activities to demonstrate actual work completed.

## Rule or policy implementing any Federal law, regulation, or guideline that is beyond what would be required to comply with 45 CFR 1329:

There is no requirement imposed in the SPIL beyond what would be required for compliance with 45 CFR 1329.

## How will the DSE will ensure compliance with state-imposed requirements without restricting the autonomy of the SILC in fulfilling its duties, authorities, and responsibilities:

The state-imposed requirement for the CILs to utilize NetCil is not imposed on the SILC. This allows the DSE to ensure compliance with the state-imposed requirement without restricting the autonomy of the SILC in fulfilling its duties, authorities, and responsibilities.

#### 4.6 722 vs. 723 State

#### Check one:

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

#### 4.7 723 States

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

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

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

#### 5.1 Establishment of SILC

How the SILC is established and SILC autonomy is assured.

#### **Established:**

The Michigan SILC was created and established in 1994 by Executive Order No. 1994-21, subsequently amended by Executive Orders No. 2007-49, 2016-11, and 2020-130. The Michigan SILC functions independently of any state agency, including the DSE, and is placed within the Office of the Governor so that it is not housed within any state agency. The Michigan SILC is an independent entity of state government and is not part of or subordinate to any state agency. The Michigan SILC has a non-profit corporation that provides staffing and operational services to the Council.

#### **Autonomy:**

The Michigan SILC is established exclusively to fulfill the applicable provisions of the Rehabilitation Act. The Michigan SILC is an independent entity of state government and is not part of or subordinate to any state agency.

The DSE administers grant funds for the Michigan SILC's operations. Operations for the Michigan SILC are autonomous from the DSE. The Michigan SILC Finance Committee prepares an annual budget that is approved and monitored by the full Council on a quarterly basis and is negotiated with the DSE.

SILC operates with funding under state grants and agreements with SILC staff employed through its private, 501(c) (3) corporation MiSILC. The membership of the MiSILC Corporation is comprised of voting council members. The MiSILC Corporation board service terms match the terms of Governor appointment dates to the Council to ensure the Council is independently in control of its own resources independent of the Office of the Governor.

The SILC Executive Director is supervised and evaluated by the SILC. The Executive Director is an Ex-Officio non-voting member of the MiSILC Corporation. Operationally, additional SILC staff work under supervision of the SILC Executive Director to coordinate efforts carrying out commitments of the SPIL.

#### 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.

Process used to develop the Resource Plan.

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

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

In order for SILC to fulfill all duties and authorities, SILC's resource plan includes: \$110,018 of Chapter 1, Part B funds, \$269,503 of Innovation and Expansion funds, and \$70,000 of state IL funds. In-kind administrative support is provided by the DSE in the form of technical assistance and grant oversight.

SILC resources will be used specifically for the following expenses:

- SILC staffing, office occupancy, communications, supplies, insurance, professional fees
  including accounting and audit services, equipment, NetCIL database licensing, and
  professional memberships;
- SPIL support costs for SILC members to fulfill their statutory duties including trainings, travel, accommodations, public meetings, public hearings, advocacy, surveys, outreach, SILC member costs to attend a joint IL summit with the CIL network, and up to \$5,000 to support a Michigan Youth Leadership Summit;
- SPIL costs of up to \$40,000 for a SILC statewide outreach initiative;
- SPIL costs of up to \$10,000 to conduct consumer satisfaction and stakeholder surveys;

SILC administrative support is provided by two SILC staff members who are not state employees and are employed by SILC through the SILC's non-profit corporation. The DSE does not provide direct staff support to the SILC. The DSE primarily provides in-kind administrative support in the form of grant technical assistance, grant monitoring and administering state and federal resources for SILC and the CILs.

The SILC Resource plan is developed in collaboration with DSE. Annually, the budget is developed after a comprehensive evaluation of the necessary resources to fulfill the mission of SILC, the implementation of the SPIL, and the cost of operations is completed. The draft budget is then presented to the Council for approval. Once the Council approves budget it is presented to the DSE for review, negotiation and approval. The resource plan is created during the 2<sup>nd</sup> quarter of the fiscal year and presented to the DSE in June of each year.

The SILC delegates day-to-day operations to the SILC staff that are responsible to ensure the proper expenditure of funding under the SILC resource plan. This occurs by:

- Yearly audits of SILC finances by an outside auditing firm.
- Adherence to the contact requirements with MRS/BSBP
- Monthly financial reports to the Executive Committee and SILC Treasurer.
- Quarterly presentation of a financial report to the council
- Compliance with SILC financial policies
- Financial Contract with CPA firm to ensure proper allocation and financial documentation.

All contracts are evaluated to ensure there are no conditions or requirements which compromise the independence of SILC. Legal opinion is obtained if there is any question of SILCs independence being compromised.

SILC resource and work plans are constructed to be reliant on the contracted resources in existence during the State Plan period. SILC staff continually evaluates and presents cost savings options to the council and DSE in order to stay within the approved resource plan.

The process utilized by the DSE to ensure timely disbursement of funds for the SILC resource plan and CILs is achieved by following State of Michigan's administration guidelines for standard of promptness in payment. Upon receipt for reimbursement from the SILC, the DSE has 10 days to process and reimburse SILC and CILs for allowable expenses. This allows for uninterrupted operations and effectiveness. SILC utilizes an electronic accounting system with built in checks and balances and separation of staff duties to mitigate financial risk. All invoices are verified and uploaded into the system prior to authorization for payment.

#### 5.3 Maintenance of SILC

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

#### **Recruitment and Appointing Authority**

Members of the SILC are appointed by the Governor of the State of Michigan. When vacancies arise, the SILC recruits potential members considering factors of significant disability, disability type, geographic representation, ethnicity, and background knowledge of Independent Living. When individuals apply, the SILC reviews the applications submitted and will send a letter to the Governor with either a recommendation to appoint or a recommendation to not appoint for a given reason. The State ensures SILC is established and operational and appointments are made in a timely manner in several ways. The DSE is an ex-officio member of the council and attends all meetings. The DSE's council membership allows for direct interaction with the council's business operations and affords the DSE with knowledge of SILC's status and compliance. Contracts with the SILC and the DSE for resources also contain a quarterly reporting requirement on all SILC standards and indicators. The State ensures SILC has sufficient resources to fulfill its statutory duties though annual budget negotiations.

SILC has an ongoing relationship with the Governor's Appointments Office and provides guidance on regulatory requirements for SILC composition and candidates for potential appointment to the Council. SILC maintains an appointments log to ensure regulatory composition requirements and regularly communicates term limits and reappointment dates to the Appointments Office to ensure SILC vacancies are filled in a timely manner. SILC was created by Executive Order and the Council is placed within the Governor's office to ensure that it is independent of any state department and has the autonomy necessary to fulfill its duties and authorities as evidenced in the Executive Order. SILC staffing is achieved through the SILC's non-profit corporation acting as the employer of record for SILC staff where the Executive Director and a Director of Operations provide administrative and operational support to the SILC in carrying out SILC's regulatory requirements. Through a resource plan collaborative process with the SILC, the DSE ensures that the SILC has the capacity to fulfill its statutory duties and authorities.

#### Staffing of SILC

The SILC Executive Director, consistent with state law, is managed, supervised, and evaluated by the appointed SILC Members. The other staff of SILC is managed, evaluated, and supervised by the Executive Director in accordance with the approved SILC personnel policies. Personnel policies of SILC are approved and reviewed periodically by the SILC.

#### **SILC Operations**

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

- SILC Bylaws
- Member Policies and Procedures
- Fiscal Policies and Procedures
- Personnel Policies

#### Section 6: Legal Basis and Certifications

#### 6.1 <u>Designated State Entity (DSE)</u>

The state entity/agency designated to receive and distribute funding, as directed by the SPIL, under Title VII, Part B of the Act is <u>Michigan Rehabilitation Services</u>. Authorized representative of the DSE Tina Fullerton Title Bureau Director.

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

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

- Sarah Peurakoski, Executive Director, Superior Alliance for Independent Living
- Jim Moore, Executive Director, Disability Network Northern Michigan
- Diane Fleser, Executive Director, Disability Network West Michigan
- Rick Diamond, Executive Director, Disability Network Lakeshore
- Joel Cooper, Executive Director, Disability Network South West Michigan and Disability Network South West Michigan Berrien/Cass
- Dave Bulkowski, Executive Director, Disability Advocates of Kent County
- Kelly Pelong, Executive Director, Disability Network Mid-Michigan
- Mark Pierce, Executive Director, Disability Network Capital Area
- Luke Zelley, Executive Director, The Disability Network
- Jon Hart, Executive Director, disAbility Connections Inc.
- Alex Gossage, Interim Executive Director, Ann Arbor Center for Independent Living
- Kelly Winn, Executive Director, Disability Network Oakland/Macomb
- Lori Hill, Executive Director, Disability Network Wayne County/Detroit
- Laura Steele, Executive Director, Blue Water Center for Independent Living

#### 6.4 <u>Authorizations</u>

- 6.4.a. The SILC is authorized to submit the SPIL to the Independent Living Administration, Administration for Community Living. Yes (Yes/No)
- 6.4.b. The SILC and CILs may legally carryout each provision of the SPIL. Yes (Yes/No)
- 6.4.c. State/DSE operation and administration of the program is authorized by the SPIL. Yes (Yes/No)

#### **Section 7: DSE Assurances**

<u>Tina Fullerton</u> acting on behalf of the DSE <u>Michigan Rehabilitation Services</u> located at <u>P.O. Box</u> 30010, <u>Lansing</u>, <u>MI 48909</u>, 517-342-3342, <u>FullertonT@michigan.gov</u> 45 CFR 1329.11 assures that:

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

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

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

<u>Tina Fullerton, Bureau Director, Michigan Rehabilitation Services</u> Name and Title of DSE director/authorized representative

Signature	Date

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

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

#### 8.1 Assurances

<u>Aaron Andres</u> acting on behalf of the SILC <u>Michigan Statewide Independent Living Council</u> located at 901 E. Mt. Hope, Suite #221, Lansing, MI 48910, 833-808-74523, aaron@misilc.org 45 CFR 1329.14 assures that:

- (1) The SILC regularly (not less than annually) provides the appointing authority recommendations for eligible appointments;
- (2) The SILC is composed of the requisite members set forth in the Act;<sup>1</sup>
- (3) The SILC terms of appointment adhere to the Act;<sup>1</sup>
- (4) The SILC is not established as an entity within a State agency in accordance with 45 CFR Sec. 1329.14(b);

- (5) The SILC will make the determination of whether it wants to utilize DSE staff to carry out the functions of the SILC;
  - a. The SILC must inform the DSE if it chooses to utilize DSE staff;
  - b. The SILC assumes management and responsibility of such staff with regard to activities and functions performed for the SILC in accordance with the Act.<sup>1</sup>
- (6) The SILC shall ensure all program activities are accessible to people with disabilities;
- (7) The State Plan shall provide assurances that the designated State entity, any other agency, office, or entity of the State will not interfere with operations of the SILC, except as provided by law and regulation and;
- (8) The SILC actively consults with unserved and underserved populations in urban and rural areas that include, indigenous populations as appropriate for State Plan development as described in Sec. 713(b)(7) the Act regarding Authorized Uses of Funds.<sup>1</sup>

#### 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) STATEWIDE INDEPENDENT LIVING COUNCIL INDICATORS. –

- (1) SILC written policies and procedures must include:
  - a. A method for recruiting members, reviewing applications, and regularly providing recommendations for eligible appointments to the appointing authority;
  - b. A method for identifying and resolving actual or potential disputes and conflicts of interest that are in compliance with State and federal law;
  - c. A process to hold public meetings and meet regularly as prescribed in 45 CFR 1329.15(a)(3);
  - d. A process and timelines for advance notice to the public of SILC meetings in compliance with State and federal law and 45 CFR 1329.15(a)(3);
  - e. A process and timeline for advance notice to the public for SILC "Executive Session" meetings, that are closed to the public, that follow applicable federal and State laws:
    - i. "Executive Session" meetings should be rare and only take place to discuss confidential SILC issues such as but not limited to staffing.
    - ii. Agendas for "Executive Session" meetings must be made available to the public, although personal identifiable information regarding SILC staff shall not be included;
  - f. A process and timelines for the public to request reasonable accommodations to participate during a public Council meeting;

- g. A method for developing, seeking and incorporating public input into, monitoring, reviewing and evaluating implementation of the State Plan as required in 45 CFR 1329.17; and
- h. A process to verify centers for independent living are eligible to sign the State Plan in compliance with 45 CFR 1329.17(d)(2)(iii).
- (2) The SILC maintains regular communication with the appointing authority to ensure efficiency and timeliness of the appointment process.
- (3) The SILC maintains individual training plans for members that adhere to the SILC Training and Technical Assistance Center's SILC training curriculum.
- (4) The SILC receives public input into the development of the State Plan for Independent Living in accordance with 45 CFR 1329.17(f) ensuring:
  - a. Adequate documentation of the State Plan development process, including but not limited to, a written process setting forth how input will be gathered from the state's centers for independent living and people with disabilities throughout the state, and the process for how the information collected is considered.
  - b. All meetings regarding State Plan development and review are open to the public and provides advance notice of such meetings in accordance with existing State and federal laws and 45 CFR 1329.17(f)(2)(i)-(ii);
  - c. Meetings seeking public input regarding the State Plan provides advance notice of such meetings in accordance with existing State and federal laws, and 45 CFR 1329.17(f)(2)(i);
  - d. Public meeting locations, where public input is being taken, are accessible to all people with disabilities, including, but not limited to:
    - i. proximity to public transportation,
    - ii. physical accessibility, and
    - iii. effective communication and accommodations that include auxiliary aids and services, necessary to make the meeting accessible to all people with disabilities.
  - e. Materials available electronically must be 508 compliant and, upon request, available in alternative and accessible format including other commonly spoken languages.
- (5) The SILC monitors, reviews and evaluates the State Plan in accordance with 45 CFR 1329.15(a)(2) ensuring:
  - a. Timely identification of revisions needed due to any material change in State law, state organization, policy or agency operations that affect the administration of the State Plan approved by the Administration for Community Living.
- (6) The SILC State Plan resource plan includes:
  - a. Sufficient funds received from:
    - i. Title VII, Part B funds;

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

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

Aaron Andres	
Name of SILC chairperson	
Signature	Date

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

#### **Section 9: Signatures**

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

The effective date of this SPIL is October 1, 2020 (year)		
SIGNATURE OF SILC CHAIRPERSON	DATE	
Aaron Andres		

#### NAME OF SILC CHAIRPERSON

Superior Alliance for Independent Living	
NAME OF CENTER FOR INDEPEN	NDENT LIVING (CIL)
SIGNATURE OF CIL DIRECTOR	DATE
Sarah Peurakoski	
NAME OF CIL DIRECTOR	
Disability Network of Northern Michigan	
NAME OF CENTER FOR INDEPEN	NDENT LIVING (CIL)
SIGNATURE OF CIL DIRECTOR	DATE
	2112
James Moore	
NAME OF CIL DIRECTOR	
Disability Network West Michigan	
NAME OF CENTER FOR INDEPEN	NDENT LIVING (CIL)
SIGNATURE OF CIL DIRECTOR	DATE
Diane Fleser	
NAME OF CIL DIRECTOR	
Disability Network Lakeshore	
NAME OF CENTER FOR INDEPEN	NDENT LIVING (CIL)
SIGNATURE OF CIL DIRECTOR	DATE
Rick Diamond	
NAME OF CIL DIRECTOR	
Disability Network Southwest Michigan and Disability	Network Southwest Michigan/Berrien
and Cass	
NAME OF CENTER FOR INDEPENDENT LIVING (	CIL)
SIGNATURE OF CIL DIRECTOR	DATE
. 10	
Joel Cooper	

#### NAME OF CIL DIRECTOR

Disability Advocates of Kent County NAME OF CENTER FOR INDEPENDENT LIVING (CIL)	
THINE OF CENTER FOR INDEPENDENT ENTING (CIE)	
SIGNATURE OF CIL DIRECTOR	DATE
<u>Dave Bulkowski</u> NAME OF CIL DIRECTOR	
Disability Network of Mid-Michigan	
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)	
SIGNATURE OF CIL DIRECTOR	DATE
Kelly PeLong NAME OF CIL DIRECTOR	
Disability Network Capitol Area NAME OF CENTER FOR INDEPENDENT LIVING (CIL)	
SIGNATURE OF CIL DIRECTOR	DATE
Mark Pierce NAME OF CIL DIRECTOR	
The Disability Network NAME OF CENTER FOR INDEPENDENT LIVING (CIL)	-
SIGNATURE OF CIL DIRECTOR	DATE
Luke Zelley NAME OF CIL DIRECTOR	
disability Connections Inc.  NAME OF CENTER FOR INDEPENDENT LIVING (CIL)	
SIGNATURE OF CIL DIRECTOR	DATE
Jon Hart NAME OF CIL DIRECTOR	

Ann Arbor Center for Independent Living		
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)		
SIGNATURE OF CIL DIRECTOR	DATE	
Alex Gossage		
NAME OF CIL DIRECTOR		
Disability Network Oakland and Macomb		
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)		
SIGNATURE OF CIL DIRECTOR	DATE	
Kelly Winn		
NAME OF CIL DIRECTOR		
Disability Network Wayne County		
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)		
SIGNATURE OF CIL DIRECTOR	DATE	
Lori Hill		
NAME OF CIL DIRECTOR		
Bluewater Center for Independent Living		
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)		
SIGNATURE OF CIL DIRECTOR	DATE	
Laura Steele		
NAME OF CIL DIRECTOR		

(INSERT ADDITIONAL CILS AS NEEDED)

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