

**Statewide Independent Living Council  
State Plan for Independent Living (SPIL) 2025-2027**

**3.2 Expansion and Adjustment of Network**

Plan and priorities for use of funds, by funding source, including Part B funds, Part C funds, State funds, and other funds, whether current, increased, or one-time funding, and methodology for distribution of funds. Use of funds to build capacity of existing Centers, establish new Centers, and/or increase the statewide reach of the Network. (Follow the instructions in Title VII, Part C of the Rehabilitation Act of 1973, as amended.)

*Provide a detailed description of the plans for expanding, building, and/or adjusting the statewide network of CILs based on increased funding, new funding, one time funding, or cuts in funding, including but not limited to:*

- *Definition of served, unserved, and underserved.*
- *Minimum funding level for a Center and formula/plan for distribution of funds to ensure that each Center receives at least the minimum.*
- *Priorities for establishment of new CIL(s).*
- *Action/process for distribution of funds relinquished or removed from a Center and/or if a Center closes.*
- *Plan to build capacity of existing CILs and/or expand statewide reach by establishing branch offices and/or satellites of existing CILs.*
- *Plan/formula for distribution of new funds (Part B, Part C, one-time funds, etc.).*
- *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. State the needed change(s) as concretely and succinctly as possible. Include*
  - *CILs included in the change*
  - *New counties/areas assigned to (or removed from) involved CILs*
  - *Changes in funding or state “no funding changes needed”*
  - *Temporary changes (if applicable) Other (if applicable)*

*Remember: The SPIL may be amended by agreement of the SILC and majority of the CILs, when needed. If details are not specific enough, there could be significant delays in the distribution of new funding.*

Served, unserved and underserved were defined by the IL Network through the analysis of existing consumer service data, consumer surveys, listening sessions, focus groups, needs assessments and direct observation. The IL Network reviewed data and other information as outlined in Section 2.2. and agreed that all 66 counties

and Tribal Nations are served in SD; there is no unserved area; and there are no unserved populations in the state.

The IL Network defines the entire state of SD as underserved due to limited resources. The IL Network will focus on efforts to improve service delivery to individuals with disabilities who are Native American, Hispanic/Latino, African American/Black, Asian/Asian American, and other minority groups that are increasing in the state. The IL Network identified objectives to better serve individuals with disabilities in the identified counties with .20% or less served of the counties' total population as an underserved population (noted in Section 2.2).

The IL Network agrees that the minimum funding level established for a CIL is the amount of Part C funds awarded by the Department of Health and Human Services, Administration for Community Living, Independent Living Program to each CIL. The priority is to use available funds to support the existing Part C CILs (ILC North, ILC South, ILC Native American, and WRIL) at the level of funding of the previous year.

Part C funds are divided between the two existing centers according to a formula established by ACL. The FY 2023 Part C Funding Awards identified that ILC received a total of \$809,025 in Part C funds from ACL (IL South/ \$596,091, IL North/\$45,160 and IL Native American/\$167,774), which equates to 74% of the total Part C funds. WRIL receives a total of \$285,972 from ACL in Part C funds, which equates to 26% of the total Part C funds coming to SD. WRIL serves 16 counties and ILC serves 50 counties along with the nine Tribal Nations. This corresponds to ILC serving 74% of the counties in the state and WRIL serving 26% of the counties. When looking at the total number of consumers served during a one-year period, this number showed that ILC served 78% of total consumers served and WRIL served 22% of the total served.

The IL Network agrees that the minimum funding level for a CIL in South Dakota is estimated to be \$250,000. Establishing a new CIL in SD is NOT a priority for the IL Network. Should increases to funding be designated for establishment of a new CIL, a significant portion of that funding would be spent on overhead and infrastructure. The current CILs maintain offices in major population centers across the state and have additional staff designated to serve outlying counties/areas. The CILs administer multiple programs and services with various funding sources that carry a portion of fixed overhead costs. Increases in funding to existing CILs would directly contribute to increased staff and consumer services.

In the event that a Part C grant to a CIL is relinquished or removed, or if a CIL closes, the unused funding would be subject to the competitive discretionary grant process established by ACL/OILP and made available to existing and prospective new CILs. This grant process would re-establish a new center in the vacated area. If there are no fundable applicants, then the funds would be distributed to the other CILs proportionate to their current Part C award to serve their current service areas. The vacated area

would remain unserved by Part C funds and the DSE could reallocate the Part B funds and other funds to cover this unserved area to the existing CILs to cover the unserved area.

In order for a CIL to receive state funds, they must be in compliance with the federal Rehabilitation Act Standards and Indicators and other applicable federal regulations; and, be in compliance with their financial contracts with the state agency (DSE), which includes the State of South Dakota's fiscal requirements. If the DSE determines that a current CIL who contracts with the DSE is no longer eligible (not meeting the state contract requirements), or if a CIL relinquishes state funds, those state funds can be redistributed proportionately to the remaining CILs who are eligible to contract with.

The IL Network has not identified a need to develop a plan for expanding the existing network of CILs. It has identified the reality that even though the entire population has access to some level of IL services, the same scope of services may not be available to persons in all portions of the state. As noted earlier, the two CILs maintain offices in major population centers across the state and have additional staff designated to serve outlying counties.

The CILs administer multiple programs and services with various funding sources that carry a portion of fixed overhead costs. Increases in funding to existing CILs would directly contribute to increased staffing and consumer services. ILC maintains offices in nine communities and WRIL maintains offices in 3 communities. Each CIL examines its own staffing needs based upon various demographics, and each makes the determination of the need to relocate FTEs to different locations of the state to better serve the changing needs of participants.

Challenges in operating a CIL in SD includes overcoming the distance between communities, reaching consumers in underserved areas, as well as seasonal elements (winter, blizzards, flooding, tornadoes) and the impact of these elements (washed out/impassable roads or bridges).

Currently, the CILs have staff offices located in numerous locations in their respective service areas and satellite offices. If sufficient additional funding were to become available, the most productive use of those funds to expand the CIL network capacity would be to add additional staff and/or satellite offices, depending upon the strategic plan of each CIL.

Distribution of state and other funds to the CILs will be determined by the following:

- Each center has a target number of units that is based on the total funds received divided by a service unit rate. If the center has shown an inability to meet or exceed their target units without acceptable justification, this can impact future increases of funding.

- The DSE is responsible for accounting for services. If program evaluations are sub-standard, this can impact future funding.
- If the center is providing services to an acceptable degree, the funding is at least equal to the previous year's Part B funds for that center. If inflationary increases are approved, those are distributed by a similar ratio.
- Centers that meet or exceed service unit targets and are in good standing; centers may obtain additional funding if it is available.
- If a center consistently fails to effectively provide IL services as evidenced by poor evaluations, the inability to reach service targets, failed attempts at corrective action, and unwillingness to accept technical assistance, the Part C funding is the minimal funding level.

Three funding sources currently support the provision of independent living services in the state: Title VII/Part C; Title VII/Part B; and funds from the DSE (Section 101/Innovation and Expansion, Social Security Reimbursement, and other funds).

The IL Network agrees that if new funds (Part B, Part C, one-time funds, etc.) are made available to the CILs, that the additional funds be distributed to all existing CILs (ILC South, ILC North, ILC Native American, and WRIL) proportionate to their current funding in order to maintain or increase the level of services in their respective areas. Potential increases in funding to the existing CILs would directly contribute to increased staffing and consumer services.

The IL Network Partners agree that in the event that plan/formula for adjusting the distribution of funds are cut/reduced including Part C, other federal or non-federal funds; this will be absorbed by the existing CIL proportionate to the prior totals received by the CIL.

The IL Network agrees that IL services are available throughout the entire state. The CILs service areas will remain the same for the duration of this SPIL. If additional funding becomes available, CILs will utilize funds to enhance operations in their current service areas.

If the need arises to examine the areas served by each CIL in the future, i.e., reassign a county/counties, or Tribal Nation(s) to a different CIL; this will involve a meeting of the IL Network. Discussion points will include the county/area to be assigned/reassigned, and whether there will be any changes required for the distribution of Part B funds. Agreement will be obtained from each CIL director before moving forward. The DSE will be involved with these discussions because possible changes might impact the level of Part B funds split among the CILs. Any changes to a CIL service area will be detailed and agreed upon by the SILC, CILs and DSE in a SPIL amendment.