Statewide Independent Living Council

Guidance for Responsible Practices for SILC Support

This guidance is intended to support SILC staff in maintaining a safe, secure, and accountable office environment. By following these procedures, SILC support staff helps minimize the risk of theft or misuse of resources, ensure ethical and responsible purchasing, and uphold compliance with all relevant federal, state, and other applicable regulations.

SILC staff is expected to:

- Minimize the possibility of theft or misuse of property, funds, and information
- Follow ethical, responsible, and reasonable purchasing procedures
- Limit purchases to items that are necessary for carrying out SILC programs and services
- Ensure all expenditures are clearly linked to the appropriate program or supporting service
- Comply with federal, state, and other applicable regulations related to procurement and office conduct

These guidelines are designed to protect the integrity of SILC operations, promote transparency, and ensure the proper use of public and private funds entrusted to the organization.

Background Information

The Division of Rehabilitation Services (Designated State Entity or DSE) maintains a contractual agreement with Black Hills Special Services Cooperative (BHSSC) to provide administrative and support services to the Statewide Independent Living Council (SILC). BHSSC (Contractor) provides the necessary staff to carry out SILC functions. The Contractor is an independent contractor and not an officer, agent, or employee of the State of South Dakota.

Duties and Responsibilities: The agreement outlines that SILC staff will be directed by the SILC Chairperson and SILC members to perform the following duties:

- Make all arrangements for regular and special meetings of the SILC.
- Make payment for services at rates allowable by the Executive Branch of State Government.
- Handle all correspondence including minutes, public notices, letters, press releases and special reports.
- Assist the SILC in developing and submitting an annual budget request to the DSE and monitor its current year’s expenditures.

    - Monitors SILC expenditures on a monthly basis, reports on expenditures in categories of staff travel, member travel, CIL staff training, meeting expenses, and strategic planning at SILC meetings.
    - Provide the SILC with requested expenditure information at such a time when they are preparing to submit an annual budget request in support of their activities to the DSE.
    - Assist the SILC in determining the level of staff support needed to carry out the specified activities under the contract.
- Provide staff support for SILC committees.
- In consultation with the SILC Chair and members, schedule, promote and conduct community forums to obtain public comment for the SPIL.
- At the direction of the signatories, assist with developing the SPIL.
- Assist the SILC and DSE in preparing the annual Program Performance Report.
- Report at Executive committee or SILC meetings as requested with other reports as required by federal law and regulations.
- Make travel and lodging arrangements for SILC members traveling on Council business and make payment for allowable costs, at rates allowable for the Executive Branch of State Government.
    - Make necessary arrangements for SILC approved business and to meet members' identified needs. Process payments for SILC member participation in Council approved functions, using appropriate rates per SD Administrative Rules and policies. Payments may cover services such as drivers, personal attendants, or childcare, if needed to support participation in SILC activities.
- Make arrangements and process payment for allowable costs for CIL staff training activities supported by the SILC.
- Provide other administrative duties as directed by the SILC Chair and the SILC Executive Committee to carry out SILC activities between meetings.

The contract contains budget items to provide financial support to the SILC utilizing Part B funds for: SILC member travel, SILC staff travel, CIL staff training, SILC meeting expenses, and the SILC Strategic Planning item.

Recordkeeping Requirements
BHSSC agrees to maintain all records necessary for proper program operation, including applications, eligibility determinations (if applicable), service provision, administrative costs, and other data required for state reporting and accountability. These records will be retained for six years after the agreement ends, or longer if an audit is pending and the State provides notice.

Contractor - BHSSC Organizational Management Processes (information not outlined in the agreement)

Black Hills Special Services Cooperative (BHSSC), established in 1980 under South Dakota Codified Law 13-37, is a public educational cooperative governed by an elected Board of Directors. The Executive Director and Business Manager oversee the BHSSC daily operations and ensure alignment and direction provided by the Board.

BHSSC adheres to standard and accepted accounting procedures, which include but are not limited to: Payroll processing, Vendor payments, Payroll withholdings, Workers' compensation management, Employee leave tracking, Monitoring and reporting of monthly expenditures.

SILC Expenditure and Reimbursement Process
Monthly Preparation and Internal Review

1. **Preparation of Expenditures**
   - Monthly SILC expenditures are prepared by BHSSC accounting/bookkeeping staff.
2. **Internal SILC Review**
   - All SILC-related expenditures are reviewed and approved by SILC staff and their direct supervisor.
3. **Security Controls**
   - SILC staff does not have access to blank checks, issued checks, or cash to ensure financial safeguards.
4. **Submission to BHSSC Board**
   - All SILC-related bills are included in the financial reports submitted to the BHSSC Board for review and approval on a monthly basis.
5. **Approval by BHSSC Board**
   - The Board reviews and approves monthly financial reports and associated expenditures.
6. **Processing by BHSSC Accounting**
   - Once approved, the BHSSC accounting/bookkeeping team processes all payments and reimbursement documentation.

Purchase Orders (PO's)
SILC staff completes and submits Purchase Orders to the area business office manager for services such as interpreter services. The PO outlines the program/grant (BVR/SILC), employee name, date of service, item purchasing, and vendor related information. The office manager enters this information into the Web Link system; it is given a PO number, and it requires approval by a BHSSC Division Director. SILC staff utilizes the DSE established Service Rate Fees, established annually, for interpreter services, personal attendant services and driver fees.

Credit Card Purchases
SILC staff has access to utilizing a BHSSC credit card. SILC staff must obtain permission from the BHSSC Division of Health and Human Services Director for the

purchase or payment of allowable costs/expenses related to the normal operation of programs/services of the SILC.

The BHSSC Division Director obtains the receipt or other documentation for all credit card purchases, and this information is provided to BHSSC accounting/bookkeeping staff. The credit card has been utilized to process payment for a SILC member/SILC staff registration fees for training/conferences and to renew the SILC's Zoom subscription.

Time and Attendance Records
SILC staff is required to complete, sign and submit time sheets for actual time worked. Timesheets must be signed by SILC staff and their supervisor.

BHSSC utilizes iSolved Timeforce, a mobile application that all employees utilize to ensure accurate time tracking and attendance management. SILC staff enters days worked and this information is reviewed and approved monthly by their direct supervisor. After approval, the BHSSC business office staff prepares and processes payroll utilizing direct deposit.

Division of Rehabilitation Services/DSE – Fiscal Management & Role
The DSE receives, disburses and accounts for Part B and VR I & E funds in accordance with the SPIL. Oversight includes ensuring expenditures are allowable, reasonable, and allocable under federal and state regulations.

The DSE must comply with State fiscal responsibilities when distributing funds through contractual relationships. Contracts over $50,000 need to go through a Request for Proposal Process for professional services; SB162 – State Board of Internal Code and 2 CFR Section 200.330 Federal Pass Through Funds.

There are no additional state-imposed requirements that limit, interfere with, or alter the SILC's autonomy in fulfilling its duties, authorities, and responsibilities.

Payment and Reimbursement: The DSE utilizes the following steps to ensure timely payment/reimbursement:

Payment and Reimbursement Process

1. **Submission to DSE:** BHSSC business office submits reimbursement to DSE
2. **DSE Independent Living Program Specialist Review**
    - The Independent Living Program Specialist reviews the reimbursement request to ensure all costs are allowable under program guidelines.
3. **Submission to DHS Fiscal Office**

    - After Program Specialist approval, the reimbursement request is forwarded to the Department of Human Services (DHS) Fiscal Office for further review.
4. **Final State Review**
    - The State Auditor’s Office performs the final review and processes the reimbursement. Reimbursement is issued electronically.