

Topic/Issue	Comment	ACL Response
General	Replace “ILA” with “ACL” everywhere.	ACL is using “ACL” throughout the Instructions and Instrument.
	“Reduce repetition”	ACL is not revising in reaction to this comment because the Instructions and Instrument do not repeat except as necessary.
	There were multiple comments to phrase the Instructions consistently with the Instrument.	ACL is not revising in reaction to these comments because the Instructions are phrased as consistently with the Instrument as is necessary.
Time estimate	“The time estimate on the cover page appears to be underestimated given the time it takes to collect data to evaluate the effectiveness of the plan’s implementation, including consumer satisfaction.”	ACL is leaving the time estimate as is for the same reason that ACL originally used this estimate.
Accessibility	Many aspects of the Instrument and Instructions are not accessible to many people who use screen readers.	ACL will work with the people who render the Instrument and Instructions in ACLReporting to ensure that the interactive Instrument and Instructions in ACLReporting are accessible to people who use screen readers.
Technical assistance	Do not include hyperlinks.	ACL is deleting the hyperlinks.
	Do not name the technical-assistance provider.	ACL is deleting the technical-assistance provider’s name.
Executive summary	Include suggestions such as: 1) who is the originator of this document. 2) Who is the intended audience. 3) Intended purpose of the document. 4) What will be learned as a result of reading this document. 5) What characteristics should be in the SPIL in light of this document. 6) Contact Information for questions, and responses.	ACL is not adding these kinds of suggestions because “summarize” is self-explanatory.
Background	Rephrase “SILC and CIL directors should be partners”	ACL is not rephrasing this statement because it clearly conveys what ACL

	to “SILC and CIL directors are partners.”	means.
Instructions as opposed to example; Instructions as opposed to Instrument	There were multiple comments about explicitly distinguishing instructions from examples.	ACL will work with the people who render the Instrument and Instructions in ACLR to convey what is instructions and what is examples.
	There were multiple suggestions to include text from the Instructions in the Instrument and/or more explicitly explain things.	ACL is not revising in reaction to these comments because repeating text from the Instructions in the Instrument would be redundant.
Definitions	Include, as a subsection, definitions of the federal government agencies that play key roles in the independent-living network.	ACL is not adding definitions of federal government agencies because that would not clarify the Instrument and Instructions.
	Add a definitions of “eligible agency,” “IL network,” “disability” (and add information about which disabilities are served), “designated service unit,” “Administration for Community Living,” “non-federal funds,” “SILC Resource Plan,” “Other SPIL Activities,” “General CIL Operations”	ACL is not adding these definitions because they would not be helpful and/or would be policymaking.
	Include underserved disability populations in the definition of “unserved and underserved groups or populations”	ACL is leaving this definition as is because it allows states to include underserved disability populations (and, therefore, does not need this addition).
	“Statewideness occurs a variety of times in the text but is not defined.”	ACL is not adding a definition of “statewideness” because only one definition makes sense in the context of the Instrument and Instructions, so adding a definition would not clarify the Instrument and Instructions.
	Define “state match” to state that the required match is 10% of the expenditures (as opposed to 10% of the appropriation).	ACL is defining “state match” to state that the required match is 10% of the expenditures (as opposed to 10% of the appropriation).

SPIL Development	Add, “Additional SILC Members, SILC staff, and as appropriate CIL staff should also be engaged in the process of the Development of the SPIL, at the direction of the SILC chairperson and CIL directors respectively.”	ACL is not adding this statement because the Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act ([the Act], P.L. 113-128) does not require SILCs to have staff.
	“Clarify that States are required to gather public input prior to development of the SPIL and prior to development of SPIL amendments”	ACL is not clarifying this issue because the Instrument and Instructions explain this issue as clearly as necessary.
	Clarify when is the Office of Independent Living Programs project officer the point of contact (and mention standardized response times for this PO) and when is the DSE the point of contact.	ACL is not clarifying these issues because the IL network needs to distinguish the OILP PO as a point of contact and the DSE as a point of contact at more-concrete levels of abstraction than the SPIL Instrument and Instructions, and because OILP needs to internally resolve issues of PO response times (as opposed to resolving these issues in the SPIL Instrument and Instructions).
	Add “. . . including the use of input and feedback received.” to last sentence.	ACL is adding this text to this section’s last sentence.
	Add collaboration with the DSE	ACL is not revising in reaction to this comment because collaboration with the DSE is not required.
	Omit “optional” from the label of the checklist for SPIL development.	ACL is not revising in reaction to this comment (because the items in this checklist are optional).
	“SPIL Planning Table could use at least one example row.”	ACL is not revising in reaction to this comment (because an example row would not be necessary and would not be helpful).
	Label the SPIL Planning Table “Appendix C”	ACL is labelling the SPIL Planning Table “Appendix C”
Nonresidential CILs	Does housing for people with disabilities that is owned by a nonprofit organization that is owned by the same parent organization as—and neither shares funding sources with, nor controls, nor is	ACL is not revising according to this question because ACL needs to answer this question on the basis of more information than is now available.

	controlled by—the CIL violate the requirement that CILs be nonresidential?	
Signatures	The paragraph immediately after the heading “SPIL Development” ought to state that the DSE is required to sign the SPIL.	ACL is not adding this text because this addition would be redundant.
	Explain why the DSE is required to sign the PPR.	ACL is not adding this text because that would be redundant.
Amendments	There were multiple comments asking ACL to clarify the amendment process.	ACL is not clarifying the amendment process because the Instrument and Instructions are as clear and as helpful as necessary.
	“include timeframes at each step that ACL has to respond or take action”	ACL is not adding timeframes because ACL does not want to imply that ACL needs to be involved in each step of the amendment process.
Goals and objectives	“(state)ians” is confusing	ACL is leaving this phrasing as is because this phrasing is easy to follow.
	Add “but are not required to” to the Instructions 1.3 Objectives’ statement that “ <i>Objectives may include specific amounts and sources of funding to be used for an objective or activity.</i> ”	ACL is not adding this text because it would be redundant.
Services	Clarify that services are to be provided to people with significant disabilities to be consistent with the purpose of IL.	ACL is adding “significant” to the first sentence of Instructions section 2.1 Services (so that the sentence is “Services to be provided to persons with significant disabilities that promote full access to community life including geographic scope, determination of eligibility and statewideness.”).
	Do not list services other than the five core services; do not list these services differently from how the Rehab Act lists them.	ACL is listing the exact services that the Rehabilitation Act lists—no more, no fewer—exactly as the Act lists them.
	Relabel the “Provided using Subchapter B” column “Provided using Subchapter B funds” and specify the funding sources that this column means to include or	ACL is keeping the current phrasing because it clearly conveys what it needs to convey.

	exclude.	
	“Add below the table: <i>‘Provide a narrative to explain why any entities other than CILs will be providing IL services.’</i> ” And add instruction to describe how entities other than CILs will provide services.	ACL is not adding these instructions because ACL does not want IL networks to think that why an entity other than a CIL is providing a service matters to ACL. And an instruction to describe how other entities provide such services would be redundant.
	There were multiple comments about clarifying which columns in the chart of services are for checking yes or no and which columns are for specifying entities.	ACL is explicitly stating which columns in the chart of services are for checking yes or no and which columns are for specifying entities.
	“Add the Note ‘CILs are not allowed to own or operate housing.’ To the service ‘Supported living’”	ACL is not adding this note because the Instrument and Instructions adequately explain this requirement elsewhere.
	Rephrase “Identify steps to be taken regarding outreach . . .” to “Identify steps to be taken regarding statewide outreach . . .”	ACL is revising according to this comment because this revision is consistent with the Rehabilitation Act’s phrasing.
	Add the following Instrument language to the Instructions. “Identify steps to be taken regarding outreach to populations that are unserved or underserved by programs that are funded under Title VII, including minority groups and urban and rural populations.”	ACL is not adding this language because it would be redundant.
	Add, to the Instructions, “For any network changes to Subchapter C distribution and/or service area, all CILs within the state and SILC must be in agreement to the changes.”	ACL is not adding this statement because it would be a requirement that neither the Rehabilitation Act nor the regulations support.
	In the Instructions section 2.2 Outreach, delete “and subchapter C” from “How services will be made available to populations that	ACL is not deleting the reference to “Part C” because ACL means to include Part C for the same reason that ACL includes Part B.

	are unserved/underserved by Subchapter B and Subchapter C”	
	There were multiple comments about explicitly stating the relationship between the outreach part of the SPIL and CILs’ outreach plans.	ACL is rephrasing the Instrument and Instructions to explicitly indicate that the outreach part of the SPIL is supposed to be separate from, coordinated with, and not a replacement for, CILs’ outreach plans.
	Rephrase the Outreach Instructions from “subchapter B and subchapter C” to “Title VII.”	ACL is rephrasing to Part B and Part C because those are the programs that ACL means for outreach to pertain to.
	Clarify whether the Outreach Instructions mean for the state to define “unserved” and “underserved” differently from the Definitions section.	ACL is not clarifying because ACL the Instructions and Definitions clearly indicate how to apply the definitions.
Existing network	In Instructions for chart of CILs, specify where to list CILs that do not provide core services.	ACL is not specifying where to list CILs that do not provide core services because ACL does not mean for this chart to include entities that call themselves CILs but do not provide core services.
	Add a column for whether a given entity is a SPIL signatory.	ACL will work with the people who render the Instrument and Instructions in ACLReporting to provide a convenient means of specifying whether a given entity is a SPIL signatory.
	Add a column for “sources of funding”	ACL is not adding a column for “sources of funding.”
	“Move the following text to the Instructions: ‘(e.g., subchapter B, subchapter C, state funds, etc.)’”	ACL is not revising according to this comment because this text provides examples, and, therefore, belongs in the Instrument.
	Label the table “ <i>Example</i> ” and include it in the Instrument	ACL is labeling the table “ <i>Example</i> ”; ACL is working with the people who render the Instrument and Instructions in ACLReporting to conveniently provide the table as a template.
	Describe changes to service areas in 3.1 Existing Centers (as opposed to 3.2 Expansion and Adjustment of Network).	ACL is not revising in reaction to this comment.
Expansion and adjustment of	Explicitly state whether states are required “to	ACL is not revising in reaction to this comment because the Instructions

network	provide a formula and plan to bring each Center to a min funding base funding level.”	adequately explain this requirement.
	Require all CILs in the state and the SILC to approve all network changes.	ACL is not requiring unanimous approval because neither the Rehabilitation Act nor the regulations require it and because it would be unnecessary.
	Add “areas” to “served, unserved, and underserved”	ACL is not revising in reaction to this comment because the Rehabilitation Act and the regulations do not limit “served, unserved, and underserved” to areas (as opposed to demographic groups).
	Add “language concerning rural and underserved areas and what is expected.”	ACL is not revising in reaction to this comment because ACL means for the people who draft a SPIL to specify rural and underserved areas and to specify plans for them.
Financial plan	There were multiple comments about the Instructions as opposed to the Instrument.	ACL is not revising according to these comments because the Instructions and the Instrument contain what they need to contain without being redundant.
	There were multiple comments about section 1.3A Financial Plan tables as opposed to 1.4 Financial plan.	ACL is combining 1.3A Financial Plan tables and 1.4 Financial plan into a section numbered 1.4 and titled “Financial plan.”
	Add separate line (in the Instructions) for subchapter B State match—a formula is provided, and it will provide a distinction between the two.	ACL is adding, to the Instructions and not to the Instrument, “The SPIL needs to specify, ‘\$X is associated with state match.’” because this addition clarifies what is Part B state match.
	Clarify whether to calculate state match using Part B and C funds only or all federal funds.	ACL is not revising in reaction to this comment because the Instrument and Instructions explain this issue as well as they can.
	There were multiple comments about rephrasing “Social Security payments” to “Social Security Reimbursement payments”	ACL is not rephrasing “Social Security payments” because this term is self-explanatory.
	Include “contractors” in the list of “non-Federal Funds” in the Instructions 1.3A Financial Plan Tables.	ACL is not including “contractors” in this list because contractors are not a source of non-federal funds.

	Switch the reference to 4.2 in “justification must be included in section 4.2” to 5.2.	ACL is fixing this error as suggested.
	There were multiple comments about states repurposing Part B and Part C funds.	ACL is not revising in reaction to these comments because the Instrument and Instructions adequately address these issues to the fullest extent appropriate.
	Require SILC and CILs “to provide administrative costs to ensure full transparency”	ACL is not requiring SILC and CILs to provide administrative costs because ACL lacks authority for such a requirement.
	Revise to accommodate complying with state policies that forbid expenditures that the SPIL lists. Or limit “Process for grants/contracts, selection of grantees, and distribution of funds to facilitate effective operations and provision of services” to subchapter B and C funds.	ACL is not revising in reaction to this comment because the SPIL Instrument and Instructions is not an appropriate venue for resolving this issue.
	There were multiple comments about the Instrument as opposed to the Instructions and about more explicitly instructing people and asking for more explanation.	ACL is not revising in reaction to these comments because the Instructions and Instrument adequately explain what they need to explain, and repeating explanations in the Instructions and Instrument would be redundant.
	Delete, from the Instructions 1.4 Financial Plan, “every agency . . . that funds an entity is responsible for fiscal and budgetary oversight”	ACL is keeping this statement because ACL thinks that this statement is necessary.
	“The column, ‘Retained by DSE for Administrative costs’ is good, but it is only needed for the ‘Chapter 1, Subchapter B’ row.”	ACL is blacking out this column for all rows except the “Chapter 1, Part B” row.
Designated State Entity	Clarify who (e.g., DSE) will draft this section.	ACL is not revising in reaction to this comment because the required collaboration is self-explanatory.
	There were multiple comments about explaining things more clearly.	ACL is not revising in reaction to these comments because the explanations are as clear as necessary.

	There were multiple comments about typos.	ACL is correcting the typos that people commented about.
	Revise Instructions 4.3 Oversight Process for Part B funds “ <i>Subchapter B (when no Subchapter C is used) oversight by DSE</i> ” from “ <i>received</i> ” to “ <i>used.</i> ”	ACL is revising according to this comment because this comment is in accordance with the Rehabilitation Act.
	Revise Instructions 4.3 Oversight Process for Part B funds from “Other funds” to “Other funds included in 1.4 Financial Plan”	ACL is revising according to this comment because this revision is clearer.
	In Instructions 4.4 Administration and Staffing, rephrase “ <i>5% of the Subchapter B appropriation will be used on administrative costs</i> ” to “ <i>5% of the total Subchapter B appropriation (including state match).</i> ”	ACL is revising in reaction to this comment because this revision clarifies the state match.
	Omit 4.4 Administration and Staffing.	ACL is not revising in reaction to this comment because this section is necessary.
	In “4.5 State Imposed Requirements” (in both the Instrument and Instructions) do not underline “That limits, expands, . . .” (or, retain the underlining and state the reason for it)	ACL is not revising according to this comment because this underlining is necessary for emphasis.
	In 4.2 723 States, delete the reference to Part C funds.	ACL is keeping this reference to Part C funds because ACL is concerned with Part C funds.
Resource plan	Consistently use the term “SILC Resource Plan”	ACL is consistently using the term “SILC Resource Plan”
722 versus 723	There were multiple comments about typos.	ACL is correcting the typos.
SILC	There were multiple comments about recommending that the SILC provide a detailed budget and allowing and that the SILC explicitly state whether it will engage in resource	ACL is not adding such recommendations because they would be redundant.

	development.	
	Add, to Instructions 5.2 SILC Resource Plan, a reference to DSE Assurances 5(d)(2)	ACL is not adding such a reference because DSE Assurances 5(d)(2) is self-explanatory.
	There were multiple comments about adding a section for the SILC to indicate authorities.	ACL is not adding a section for the SILC to indicate authorities because that would be redundant.
	Rephrase the requirement of the state ensuring that the SILC composition requirements are met to the SILC ensuring that these requirements are met.	ACL is not revising in reaction to this comment because the state is responsible for establishing and maintaining the SILC.
	Use establishment language from the law as opposed to “. . . not part of any state agency.”	ACL is not revising in reaction to this comment because establishment language from the law cannot adequately substitute for “. . . not part of any state agency.”
	Include a workflow chart.	ACL is not revising in reaction to this comment because a workflow chart would not be very helpful and would be difficult to make accessible.
	Explicitly clarify that SILC and CILs are grantees.	ACL is not revising in reaction to this comment because SILCs are not grantees.
Network participation	Add to Section 1, under “SPIL Development,” “Additional SILC Members, SILC staff, and as appropriate CIL staff should also be engaged in the process of the Development of the SPIL, and entire IL Network at the direction of the SILC chairperson and CIL directors respectively.”	ACL is not revising in reaction to this comment because SILCs are not required to have staff.
Evaluation	There were multiple comments about rephrasing “Evaluation Plan” to “SPIL Evaluation Plan”	ACL is rephrasing “Evaluation Plan” to “SPIL Evaluation Plan” everywhere.
	Clarify that the table does not consist of two distinct parts.	ACL will tell the people who will render the Instrument and Instructions in ACLR to avoid confusion about a two-part table.
	Rephrase “Evaluation plan is intended to measure how well the activities in the plan	ACL is not revising in reaction to this comment because this comment would not clarify or improve the Instructions or

	make progress in achieving the objectives and subsequently the goals and mission” to “Evaluation plan is intended to measure how well the activities in the plan make progress in achieving the objectives and desired outcomes, and subsequently the goals and mission”	Instrument.
	Do not require the Evaluation plan to “ <i>describe how the SILC will . . . incorporate information from the CILs’ most recently available Program Performance Reports</i> ”	ACL is not revising according to this comment because this description is necessary.
	Clarify the apparent contradiction between “Compliance of CILs receiving Subchapter B funds for general operations is the responsibility of the DSE with respect to Subchapter B funding” and “Subchapter C (alone or in combination with Subchapter B or other funds)	ACL is not revising according to this comment because these two sentences do not contradict each other.
	Omit “[<i>this is the statute’s language</i>]” from the sentence that starts with “ <i>To facilitate the SILC’s duty to monitor,</i> ”	ACL is not revising according to this comment because this text is necessary.
	Require all responsible parties listed to agree to the assigned data collection and defined responsibilities.	ACL is not revising according to this comment because such a revision would be redundant.
Legal Basis and Certifications	Move the contents of this section to <ul style="list-style-type: none"> • DSE contents to the section 4 (DSE) • SILC contents to section 5 (SILC) • CIL contents to section 3 (CILs) 	ACL is not revising according to this comment because this section serves its purpose.
DSE Assurances	There were multiple	ACL is not revising according to these

	comments about adding more explanation about who must sign and what the signatures must mean.	comments because this this paragraph is adequately explanatory as it is.
SILC Assurances and Indicators of Minimum Compliance	There were multiple comments suggesting adding more explanation.	ACL is not revising according to these comments because more explanation would be redundant.
	Truncate the sentence that starts with “All meetings regarding the State Plan development and review are open to the public” immediately after “public.”	ACL is not revising according to this comment because this sentence uses the same phrasing that the standards and indicators use.
	Do not cite 45 CFR 1329.17(f)(2)(i)-(ii) to refer to SILC meetings.	ACL is not revising according to this comment because this part of the Instructions and Instrument is necessary.
Conceptual Chain	Label it “Appendix D”	ACL is labeling the conceptual chain “Appendix D”
Submittal	Specify that the SPIL must be submitted to ACL by the SILC.	ACL is rephrasing this sentence to, “The SILC must submit the SPIL to ACL.”
	There were multiple suggestions to clarify the DSE’s signature and what it means.	ACL is not revising in reaction to these comments (because the requirement of a DSE signature is adequately explained).
Review and approval	Add a definition of “ACL administrator”	ACL is not revising in reaction to this comment (because the Rehab Act defines “administrator” as “ACL administrator”).
	Include appeals process	ACL is not revising in reaction to this comment because ACL lacks the authority to include an appeals process.
irrelevant	There were multiple suggestions to further emphasize necessary services.	ACL is not revising in reaction to these comments because the Instructions and Instrument adequately emphasize services.
	Oppose all comments that the Neb. SILC made.	ACL is not revising in reaction to this comment because it is inappropriate.
	Do not follow the medical model of disability.	ACL is not revising in reaction to this comment because ACL lacks the authority to revise at so high a level of abstraction.
	There were multiple suggestions to omit endnotes and/or footnotes.	ACL is not revising in reaction to these comments because ACL thinks that the endnotes are necessary.