

0985-0043 Public Comment and ACL Response Table

Comment From	Section	Public Comment	ACL Response
Ore. SILC ED Brooke Wilson	Cover page	“missing the [P]aperwork [R]eduction [A]ct paragraph”	The PBS is included on the final Instrument and Instructions.
Ore. SILC ED Brooke Wilson	Table of contents	Instrument’s table of contents “may be off including ‘Error! Bookmark not defined’”	There was no evidence of this error or a similar error. ACL will monitor for this and make corrections where they are needed.
Ore. SILC ED Brooke Wilson	Table of contents	Instructions’ “table of contents’ Section F – Sex no longer matches the instrument. Should read ‘Sexual Orientation and Gender Identity.’”	ACL is correcting this error.
Ore. SILC ED Brooke Wilson	Glossary	“Core Services does not include transition” whereas “‘Independent Living Core Services’ lists all 5”	ACL is revising to define “core services” the same as “independent living core services”
Ore. SILC ED Brooke Wilson	Glossary	“formatting errors including underlined words, indents off”	ACL is revising to resolve these errors.
Stephanie Jensen at Wyo. Dept. of Workforce Services Division of Vocational Rehabilitation	Subpart I – Administrative Data, Section A – Sources and Amounts of Funds and Resources	“Title VII, Ch. 2 funds should be removed”	ACL is replacing the prior questions with the table with the SPIL to ensure consistency.
Jeremy Morris and National	Subpart I – Administrative	“Section A should be revised and modeled	ACL is revising.

Council on Independent Living (NCIL) (separately made this comment)	Data, Section A – Sources and Amounts of Funds and Resources	after the financial table in the State Plan for Independent Living, as shown below”	
Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section A – Sources and Amounts of Funds and Resources, Item 1 – All Federal Funds	“We have included I&E here . . . , will this be moved/changed?”	This will be included in the new table that is consistent with the financial table in the SPIL.
Jeremy Morris and NCIL and Idaho SILC ED Mel Leviton (separately asked same question)	Subpart I – Administrative Data, Section A – Sources and Amounts of Funds and Resources, Item 7 – Total State Funds Allotted to Support CIL Operations	Is the same funding amount supposed to be reported in “Item 2(E) and again in Item 7?”	New table included that is consistent with the SPIL financial table.
Idaho SILC ED Mel Leviton	Subpart I – Administrative Data, Section A – Sources and Amounts of Funds and Resources, Item 7 – Total State Funds Allotted to Support CIL Operations	“Why is this not included in the table?”	New table included that is consistent with the SPIL financial table
Idaho SILC ED Mel Leviton	Subpart I – Administrative Data, Section A – Sources and Amounts of Funds and Resources, Item 7 – Total State Funds Allotted to	“Where do subrecipients provide that number when it comes directly from the state?”	New table included that is consistent with the SPIL financial table

	Support CIL Operations		
Idaho SILC ED Mel Leviton	Subpart I - Administrative Data	"Revise Items 1-8 to mirror the financial table in the State Plan"	ACL is revising.
Idaho SILC ED Mel Leviton	Subpart I - Administrative Data	"Add a section/item for the DSE to account for I&E resources provided to the SILC to ensure sufficient resources"	New table included that is consistent with the SPIL financial table
Ore. SILC ED Brooke Wilson	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources, Item 2 - Other Government Funds	"Do we still include IL general funds and state match funds here?"	New table included that is consistent with the SPIL financial table that separates these out
Ore. SILC ED Brooke Wilson and Stephanie Jensen of Wyo. VR	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources	"Why are Item 7 & 8 not in the table?"	New table included that is consistent with the SPIL financial table
Jeremy Morris and NCIL (separately asked same question)	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources, Item 7 - Total State Funds Allotted to Support CIL Operations	Does this exclude the required state match?	New table included that is consistent with the SPIL financial table
Ore. SILC ED Brooke Wilson	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources, Item 7 - Total State	"Could create another line within Item 2."	New table included that is consistent with the SPIL financial table

	Funds Allotted to Support CIL Operations		
Jeremy Morris and NCIL and Idaho SILC ED Mel Leviton (separately asked this same question)	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources, Item 8 - Total Section 110 (I&E Funds)	"Is this still included in Item 1(D)?"	New table included that is consistent with the SPIL financial table
Ore. SILC ED Brooke Wilson	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources, Item 8 - Total Section 110 (I&E Funds)	"Could create another line within Item 1."	New table included that is consistent with the SPIL financial table
Ore. SILC ED Brooke Wilson and Stephanie Jensen of Wyo. VR both made this comment	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources	"Items 7 and 8 should be included in the table."	New table included that is consistent with the SPIL financial table
Ore. SILC ED Brooke Wilson	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources	"It goes 1. 2. 3. Item 7?"	New table included that is consistent with the SPIL financial table.
Ore. SILC ED Brooke Wilson	Subpart I - Administrative Data, Section A - Sources and Amounts of Funds and Resources	"Define each item 1-8."	New table included that is consistent with the SPIL financial table and the information is provided in the ILS instructions that mirrors the SPIL instructions.

Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section A – Sources and Amounts of Funds and Resources	“Will we report these funding sources in both places?”	New table included that is consistent with the SPIL financial table
Jeremy Morris	Subpart I – Administrative Data	“There is a need to have a section for the DSE to report how they ensure the SILC has been provided necessary and sufficient resources.”	ACL is replacing the prior questions with the financial table to show what was planned to be allocated in the SPIL versus what was allocated to confirm they met the SPIL requirements.
Jeremy Morris	Subpart I – Administrative Data	“DSE should also have a section where they respond to how they have not interfered with the operation of the SILC. “Section should have some form of review of complying with the assurances.”	This revision will be addressed in the 30- day comment period in response to meetings with the stakeholders.
Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section B – Distribution of Title VII, Chapter 1, Part B Funds	“New #9 within the table – \$ is missing in funding columns.”	New table included to replace the prior financial questions that is consistent with the SPIL financial table
Jeremy Morris, NCIL, and Stephanie Jensen of Wyo. VR separately made this comment	Subpart I – Administrative Data, Section C – Grants or Contracts Used to Distribute Title VII, Chapter 1, Part B Funds	“Designated in SPIL as Underserved/ Unserved Area? – Some CILs receive a Part B grant to serve both a served and an unserved area. A simple Yes/No to this area could be misleading”	ACL is revising the Instructions to address this comment.
Ore. SILC ED	Subpart I –	“Designated in SPIL as	ACL revised; revisions

Brooke Wilson	Administrative Data, Section C – Grants or Contracts Used to Distribute Title VII, Chapter 1, Part B Funds	Underserved/ Unserved area? (Yes/No) – Two separate questions may better capture data. - “... Underserved?” - “Unserved?”	appear in 30-day FRN package.
Idaho SILC ED Mel Leviton	Subpart I – Administrative Data, Section C – Grants or Contracts Used to Distribute Title VII, Chapter 1, Part B Funds	“Designated in the SPIL as Underserved/ unserved Area? (Yes/No) – What is the point of this question?”	ACL is revising to remove this question.
Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section C – Grants or Contracts Used to Distribute Title VII, Chapter 1, Part B Funds	“Changes to the table – removing consumer eligibility determined by DSE or provider – Ensuring consumer control is IL philosophy.”	This question does not provide information on whether the provider or the DSE is following IL philosophy, so we are removing it.
Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section C – Grants or Contracts Used to Distribute Title VII, Chapter 1, Part B Funds	“What do we plan to do with this information? Will this be tracked year to year? Within each CIL PPR[,] data is captured on counties served. Will SILC/DSE use CIL PPR data to complete?”	ACL is revising to remove counties.
Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section E	“title doesn’t match in instrument”	ACL is changing so they are consistent.
Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section E	“(Copies of monitoring reports should be mailed to your program officer).’ – This is new language and should be highlighted or something.”	ACL is underlining the language.

Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section E	“New for CILs that only receive part B money, describe how it is confirmed that they meet the definition of a CIL May strain the relationship between CILs, SILC and DSE”	The DSE is required to ensure proper disbursement of funds and if the plan is to distribute Part B to a CIL they are justified in confirming the program is indeed a CIL by the definition in statute.
Ore. SILC ED Brooke Wilson	Subpart I – Administrative Data, Section F	“Typo of an extra period on 3rd line”	ACL is fixing this typo.
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“(1) and (2) – Enter the number of consumers served.... Now has more than 1 and 2 options. Review for accuracy to match instrument.”	ACL is revising to match the Instrument.
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“New – Table for Gender Identity”	ACL appreciates the comment and is not revising in response.
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“New – more than just Male or Female – YAY!!!”	ACL appreciates the comment and is not revising in response.
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of	“Total of genders (Male+Female=Total	The table does not require the total to

	Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	CSRs) use to be required. No totals in the new tables. To encourage people to answer these questions totals should not be required to match.”	match; these questions are optional for all respondents.
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“What is the purpose of collecting this information?” (asked about both sexual orientation & gender identity and new table for sexual orientation)	Executive Order 14075 directs Federal agencies to promote inclusive and responsible Federal data collection practices to advance equity and full inclusion for LGBTQI+ individuals and requires that the Federal government use evidence and data to measure and address the disparities that LGBTQI+ individuals, families, and households face, while safeguarding privacy, security, and civil rights.
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Suggest removing ‘That is, not gay or lesbian.’”	The questions align with recommendations from the National Academies of Sciences, Engineering, and Medicine’s (NASEM’s) recent report, “Measuring Sex, Gender Identity, and Sexual Orientation.” These items have been

			cognitively tested and performed well.
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Will totals be required to match?”	The totals are not required to match; these questions are optional for all respondents.
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Will training be provided to CIL staff at all levels?”	This question requires no revision because training CIL staff is outside this PPR’s scope.
Ore. SILC ED Brooke Wilson and	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“The sexual orientation and gender identity changes will require new questions to be asked. Training for staff on how to ask these questions. This data is not currently collected everywhere, there will need to be changes throughout the data collection process before accurate reporting can be done.”	This question requires no revision because training CIL staff is outside this PPR’s scope.
Idaho SILC ED Mel Leviton	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“How will staff be trained to respect cultural and generational differences? . . . Will staff be trained to respect the language usage of the community . . . ? If they have little or no experience with the Spanish speaking	The answers to these questions are outside this PPR’s scope.

		community, will they even know this is an area they should let others lead?"	
Jeremy Morris	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Great addition to not be set as a binary”	ACL appreciates the comment and is not revising in response.
Jeremy Morris	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“It might be more effective to have the Male, Female, Other or Self Identified, and Prefer not to disclose.”	The questions align with recommendations from the National Academies of Sciences, Engineering, and Medicine’s (NASEM’s) recent report, “Measuring Sex, Gender Identity, and Sexual Orientation.” These items have been cognitively tested and performed well.
Idaho SILC ED Mel Leviton	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Why not use the language currently in the US Census?”	These questions align with the questions in the U.S. Census Bureau’s Household Pulse Survey. They are based on the recommendations from the National Academies of Sciences, Engineering, and Medicine’s (NASEM’s) recent report, “Measuring

			Sex, Gender Identity, and Sexual Orientation.” These items have been cognitively tested and performed well.
Idaho SILC ED Mel Leviton	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“I am concerned with how out-of-touch the questions are to the realities of cultural difference, i.e.: (4) Number of individuals who identify as two-spirit.”	The questions align with recommendations from the National Academies of Sciences, Engineering, and Medicine’s (NASEM’s) recent report, “Measuring Sex, Gender Identity, and Sexual Orientation.” These items have been cognitively tested and performed well.
Jeremy Morris and NCIL (separately made this comment)	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Whitehouse guidance around collecting SOGI information . . . implies that the collection of SOGI information is to be done via surveys [T]his would be . . . required”	Executive Order 14075 directs Federal agencies to promote inclusive and responsible Federal data collection practices to advance equity and full inclusion for LGBTQI+ individuals and requires that the Federal government use evidence and data to measure and address the disparities that LGBTQI+ individuals, families, and households face, while safeguarding privacy, security, and

			civil rights.
Jeremy Morris	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“There may be some concern that adding SOGI questions to a survey will cause respondents to . . . abandon the survey . . . impact to consumers . . . is unclear”	Studies cited by the National Academies of Sciences, Engineering, and Medicine’s (NASEM’s) recent report, “Measuring Sex, Gender Identity, and Sexual Orientation” indicate that, as measured by item nonresponse, sex assigned at birth and gender identity are an order of magnitude less sensitive than other common demographic questions.
NCIL and Jeremy Morris both asked this question	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Research to date has illustrated the difficulty in translating SOGI terms . . . Will ACL be providing the translation services?”	There are Spanish-language versions of these questions currently available. ACL does not currently have recommended best questions for languages other than English and Spanish and will be providing future.
Idaho SILC ED Mel Leviton	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual	“How will the sexual identify, gender identity (SOGI [sic.]) questions be presented or translated for those whose language is not English?”	ACL will provide Spanish-language versions of these questions. ACL does not currently have recommended best

	Orientation and Gender Identity		questions for languages other than English and Spanish and will be providing future.
NCIL and Jeremy Morris both made this comment	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“proposed revision forces the consumer to select one option. This practice further goes against the Whitehouse [sic.] guidance of ‘design elements that improve data quality: . . . multiple response options . . . prevents forcing respondents to choose between multiple applicable”	The questions align with recommendations from the National Academies of Sciences, Engineering, and Medicine’s (NASEM’s) recent report, “Measuring Sex, Gender Identity, and Sexual Orientation.” These items have been cognitively tested and performed well.
Jeremy Morris	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Whithouse [sic.] guidance includes information about when the survey question is not answered”	These questions are optional for all respondents.
Idaho SILC ED Mel Leviton	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“I suggest . . . Male, Female or Other. Leave space for people to elaborate if they choose “I’d suggest a similar narrowing of terms under the heading of sexual identity”	The questions align with recommendations from the National Academies of Sciences, Engineering, and Medicine’s (NASEM’s) recent report, “Measuring Sex, Gender Identity, and Sexual Orientation.” These

			items have been cognitively tested and performed well.
NCIL, Jeremy Morris, and Tri-County ILC Deputy Director Tami Gaugler made this comment	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	<p>“Typically, this type of . . . data is collected and maintained separate from an individual[']s data ACL provides no guidance on this matter, . . . the reporting instrument . . . would lead CILs to identify this as part of the consumer’s file Mandatory collection from CILs with staff that are not trained properly or given the tools and information . . . risk causing harm” that may include harm to individuals on the basis of their sexual orientation or gender identity and may include using this information to justify withholding funding from CILs</p>	Executive Order 14075 directs Federal agencies to promote inclusive and responsible Federal data collection practices to advance equity and full inclusion for LGBTQI+ individuals and requires that the Federal government use evidence and data to measure and address the disparities that LGBTQI+ individuals, families, and households face, while safeguarding privacy, security, and civil rights.
Idaho SILC ED Mel Leviton	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	<p>“How will [sexual orientation and gender identity] be safeguarded?”</p> <p>“How will CIL staff be trained to ask the questions, especially CIL staff who are a product of the community where they live and may be overtly or covertly biased against people who identify with terms outside of male and female?”</p>	Executive Order 14075 directs Federal agencies to promote inclusive and responsible Federal data collection practices to advance equity and full inclusion for LGBTQI+ individuals and requires that the Federal government use evidence and data to measure and address the disparities that

			LGBTQI+ individuals, families, and households face, while safeguarding privacy, security, and civil rights.
Idaho SILC ED Mel Leviton	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“I’m unclear on the point of extensive questions. What will be done with this information, i.e., how will it be aggregated and for what purpose?”	Executive Order 14075 directs Federal agencies to promote inclusive and responsible Federal data collection practices to advance equity and full inclusion for LGBTQI+ individuals and requires that the Federal government use evidence and data to measure and address the disparities that LGBTQI+ individuals, families, and households face, while safeguarding privacy, security, and civil rights.
Ore. SILC ED Brooke Wilson and Idaho SILC ED Mel Leviton both asked this question	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section F – Sexual Orientation and Gender Identity	“Questions like this may cause consumers to retreat or remove themselves from CIL service.”	Studies cited by the National Academies of Sciences, Engineering, and Medicine’s (NASEM’s) recent report, “Measuring Sex, Gender Identity, and Sexual Orientation” indicate that, as measured by item nonresponse, sex assigned at birth and gender identity are

			<p>an order of magnitude less sensitive</p> <p>than other common demographic questions.</p>
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section G – Race and Ethnicity	“remove ‘Sub-Chapter’ – insert ‘Part’”	ACL is replacing “Sub-Chapter” with “Part”
NCIL and Jeremy Morris both made this comment	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section G – Race and Ethnicity	“OMB Guidance does include . . . adding ‘Middle Eastern or North African’”	ACL is retaining to allow comparison with Census categories
Ore. SILC ED Brooke Wilson	Subpart II – Number and Types of Individuals with Significant Disabilities Receiving Services, Section G – Race and Ethnicity	“Suggest keeping” option of “Two or more races”	On (7), ACL added to the instrument “Two or more races”
Ore. SILC ED Brooke Wilson and Idaho SILC ED Mel Leviton both made this comment	Subpart III – Individual Services and Achievements Funded through Title VII, Chapter 1, Part B Funds, Section A – Individual Services and Achievements	“With the recent focus on transition services[,] why do we not include ‘Institutional Transition’ in the table/list?”	It’s listed as a goal. Services for institution relocation include Housing, PA services, IL skills training, etc...
Ore. SILC ED Brooke Wilson	Subpart III – Individual Services	“review formatting”	The formatting is

	and Achievements Funded through Title VII, Chapter 1, Part B Funds, Section B – Increased Independence and Community Integration		appropriate as it is.
Ore. SILC ED Brooke Wilson	Subpart III – Individual Services and Achievements Funded through Title VII, Chapter 1, Part B Funds, Section B – Increased Independence and Community Integration	Will letter L, which is labeled “Other,” “be an expandable table?”	Yes, as there will be text required.
Ore. SILC ED Brooke Wilson	Subpart III – Individual Services and Achievements Funded through Title VII, Chapter 1, Part B Funds, Section B – Increased Independence and Community Integration	“Will it have character limits?”	No
Ore. SILC ED Brooke Wilson	Subpart III – Individual Services and Achievements Funded through Title VII, Chapter 1, Part B Funds, Section C – Additional Information Concerning Individual Services	“word or character count . . . would be helpful”	It’s not included, so ACL doesn’t limit success stories or barriers.

	or Achievements		
Ore. SILC ED Brooke Wilson and Idaho SILC ED Mel Leviton both asked this question	Subpart IV – Outreach and Coordination – Community Outreach	“Do we use SPIL definitions for unserved & underserved?”	Yes.
Ore. SILC ED Brooke Wilson	Subpart IV – Outreach and Coordination – Community Outreach	“Missing Outreach Efforts and description”	ACL is revising this section.
Ore. SILC ED Brooke Wilson	Subpart IV – Outreach and Coordination – Community Outreach	“Activity type (column 2) paragraph states ‘OILP has chosen to highlight four activity types listed above. However respondents are expected to include all community outreach activities to unserved or underserved group’ – Will the table allow for text not a drop down menu?”	ACL is revising this section.
Ore. SILC ED Brooke Wilson	Subpart IV – Outreach and Coordination – Community Outreach	Will the table “create double reporting – Part C CILs submit this information in their PPR as well.”	ACL is revising this section to remove this table.
Ore. SILC ED Brooke Wilson	Subpart IV – Outreach and Coordination – Community Outreach	“How will the SILC & DSE who are responsible for submitting the ILS PPR get this information from the Part C CILs?”	ACL is revising this section.
Ore. SILC ED Brooke Wilson	Subpart IV – Outreach and Coordination – Community Outreach	“No longer collecting hours spent[,] which may cause issues for states who have used this in the past”	States may request grantees to track hours spent separately from this PPR, so ACL is not

			revising in response to this comment.
NCIL	Subpart IV - Outreach and Coordination - Community Outreach	"sample table has the activity type of community ed/outreach, which isn't an option."	ACL is revising this section.
NCIL	Subpart IV - Outreach and Coordination - Community Outreach	"examples in the table don't describe outreach efforts"	ACL is revising this section.
NCIL and Jeremy Morris both made this comment	Subpart IV - Outreach and Coordination - Community Outreach	"example table is incomplete"	ACL is revising this section.
Stephanie Jensen of Wyo. VR	Subpart IV - Outreach and Coordination, Section A - Community Outreach	"'ornames' should be 'or names'"	ACL is revising this section.
Jeremy Morris and NCIL	Subpart IV - Outreach and Coordination - Community Outreach, Section A - Community Outreach	"outreach" was removed as an activity type; does that mean that "systemic advocacy" is now a type of outreach?	ACL is revising this section.
Idaho SILC ED Mel Leviton	Subpart IV - Outreach and Coordination, Section A - Community Outreach	"Remove Outreach as it doesn't match the language in the SPIL instrument"	ACL is revising this section.
Jeremy Morris	Subpart IV - Outreach and Coordination, Section A -	"The examples in the table aren't . . . describing outreach"	ACL is revising this section.

	Community Outreach		
Jeremy Morris and Idaho SILC ED Mel Leviton both made this comment	Subpart IV - Outreach and Coordination, Section A - Community Outreach	"The sample table . . . isn't complete to show exactly what was meant."; the table is confusing	ACL is revising this section.
Jeremy Morris and NCIL both made this comment	Subpart IV - Outreach and Coordination, Section A - Community Outreach	This "section will also have all CILs[,] even ones with only Part C [funding,] having to report."	ACL is revising this section.
Jeremy Morris and NCIL both made this comment	Subpart IV - Outreach and Coordination, Section A - Community Outreach	"sets the expectation that there will be objectives in Section 2.2 of the State Plan to be reported on the ILS PPR. So the SPIL Instrument and Instructions will need to be updated"	ACL is revising this section.
Jeremy Morris and NCIL both made this comment	Subpart IV - Outreach and Coordination, Section A - Community Outreach	"If section is being changed to mirror . . . the Section 2.2 of the SPIL, this should then be changed to a narrative section similar to the ILS PPR Section B - Working Relationships among Various Entities."	ACL is revising this section.
Jeremy Morris	Subpart IV - Outreach and Coordination, Section A - Community Outreach	"proposed change significantly increases the reporting burden."	ACL is revising this section.
Idaho SILC ED Mel Leviton	Subpart IV - Outreach and Coordination, Section A -	"How will we collect CIL information and differentiate it from what CILs put on their Part C	ACL is revising this section.

	Community Outreach	PPR?"	
Ore. SILC ED Brooke Wilson	Subpart IV – Outreach and Coordination, Section B – Working Relationships among Various Entities	“Extra comma in 4th line of the paragraph”	ACL is deleting this extra comma.
Jeremy Morris and NCIL both made this comment	Subpart IV – Outreach and Coordination, Section B – Working Relationships among Various Entities	“Should be renamed ‘Coordination’ to match the language in the SPIL.”	ACL is revising this section.
Stephanie Jensen of Wyo. VR	Subpart V – Statewide Independent Living Council, Section A – Composition and Appointment	“The new second column for Individuals with a disability is good since someone could have a disability and fill a different appointment category.”	ACL appreciates this comment and is not revising in response.
Jeremy Morris and Ore. SILC ED Brooke Wilson and Idaho SILC ED Mel Leviton made this comment	Subpart V – Statewide Independent Living Council, Section A – Composition and Appointment	“Composition requirement chart was removed. This chart should be included”	ACL is revising this section.
NCIL	Subpart V – Statewide Independent Living Council, Section A – Composition and Appointment	“should ask how recommendations for [SILC] appointment are submitted to appointing authority and by whom”	ACL is adding Item 4 that allows them to share any barriers they have encountered meeting SILC Composition requirements.
Jeremy Morris and Ore. SILC ED Brooke	Subpart V – Statewide Independent Living	“There should be another Item in this section about the communication with	ACL is adding Item 4 that allows them to share any barriers

Wilson and Idaho SILC ED Mel Leviton made this comment	Council, Section A - Composition and Appointment	the Appointing Authority where SILCs can address who the appointing authority is, who is the contact person, how the SILC provides input, and if there are barriers to getting appointments.”	they have encountered meeting SILC Composition requirements.
Idaho SILC ED Mel Leviton	Subpart V – Statewide Independent Living Council, Section A - Composition and Appointment	<p>“Include a section to discuss barriers and success to appointment in working with the appointing authority.</p> <p>“Include a section for SILCs to write how they are working to maintain or reestablish compliance with composition.”</p>	ACL is adding Item 4 that is optional but allows respondents to share any barriers they have encountered meeting SILC Composition requirements.
Jeremy Morris and Ore. SILC ED Brooke Wilson both made this comment	Subpart V – Statewide Independent Living Council, Section A - Composition and Appointment	“should address recruitment of SILC members”	ACL is adding Item 4 that is optional but allows recipients to share any barriers they have encountered meeting SILC Composition requirements.
Jeremy Morris and Ore. SILC ED Brooke Wilson both made this comment	Subpart V – Statewide Independent Living Council, Section A - Composition and Appointment	“Narrative section should be included for if a SILC is not in compliance with composition requirements.”	ACL is adding Item 4 that is optional but allows recipients to describe the appointment process and share any barriers they have encountered meeting SILC Composition requirements.

NCIL and Ore. SILC ED Brooke Wilson separately made this comment	Subpart V – Statewide Independent Living Council, Section A - Composition and Appointment	“PPR should ask how SILC autonomy is assured in selection, management, and evaluation processes of DSE staff assigned to SILC”	Language added to instructions to assure staff provided by DSE are under the authority of the SILC.
Stephanie Jensen at Wyo. VR	Subpart V – Statewide Independent Living Council, Section B – SILC Membership Qualifications	States “board” when it means “broad”	ACL is correcting this typo.
Jeremy Morris	Subpart V – Statewide Independent Living Council, Section B – SILC Membership Qualifications	“Knowledge about IL Section in Item 3 should include language about how the SILC maintains a training plan for the SILC members and how that work is completed.”	ACL is adding this to the instructions under Item 3.
NCIL	Subpart V – Statewide Independent Living Council, Section C – SILC Staffing and Support	“There is a need to record implementation of SILC written policies and procedures as stated in indicators.”	ACL is adding an optional section relating to SILC indicators and barriers to meeting them.
Jeremy Morris and Ore. SILC ED Brooke Wilson both made this comment	Subpart V – Statewide Independent Living Council, Section C	“Item 2 should specify how, if the SILC uses DSE support, the SILC has authority of the DSE staff. “Item 3 should be created to address SILC Autonomy.”	ACL is adding to the instructions “and how the SILC maintains authority over that staff.”
NCIL	Subpart V – Statewide Independent Living Council, Section C	“Need space to record contact person for appointing authority and how and when the SILC communicates with [that person]”	Addressed in prior comment

Idaho SILC ED Mel Leviton and NCIL both made this comment	Subpart V – Statewide Independent Living Council, Section C	“Not ALL SILCs have and [sic.] Executive Director”	ACL is adding clarifying language, “if applicable” after SILC executive director
Idaho SILC ED Mel Leviton	Subpart V – Statewide Independent Living Council, Section D – Grants or Contracts for Purposes Other than Providing IL Services or for the General Operation of Centers	“Allow opportunities to discuss how evaluations might evolve.”	That would be outside the appropriate scope of this PPR.
Stephanie Jensen of Wyo. VR and Ore. SILC ED Brooke Wilson both made this comment	Subpart V – Statewide Independent Living Council, Section E – Training and Technical Assistance Needs	“‘Training and Technical Assistance Need- Workforce Investment Act of 1998’ needs to be removed and possibly replaced with ‘Workforce Innovation and Opportunity Act.’ ‘704 Reports’ needs to be replace with ‘Program Performance Reports.’”	ACL is revising this section.
Stephanie Jensen of Wyo. VR	Subpart V – Statewide Independent Living Council, Section E – Training and Technical Assistance Needs	“The CIL Executive Directorship Skills Building and First-Line CIL Supervisor Skills Building should be removed. The Section with topics on CIL Board of Directors should be removed.”	ACL is keeping them because they pertain to Part B CILs.
Stephanie Jensen of Wyo. VR	Subpart V – Statewide Independent Living Council, Section E – Training and Technical Assistance Needs	“‘Implementation (monitor & review) of SPIL’ should be ‘Monitor, review, and evaluation of implementation of SPIL’”	Revision made.
Jeremy Morris	Subpart VI – State	“An Item should be	Added clarifying

and Ore. SILC ED Brooke Wilson both made this comment	Plan for Independent Living (SPIL) Comparison and Updates, Other Accomplishments and Challenges of the Reporting Year, Section A - Comparison of Reporting Year Activities with the SPIL	added to ask about how the Evaluation Plan of the SPIL is being followed. “An item should be added to address the satisfaction of consumers as required in the Evaluation Plan of the SPIL.”	language to the instrument.
NCIL	Subpart VI - State Plan for Independent Living (SPIL) Comparison and Updates, Other Accomplishments and Challenges of the Reporting Year, Section B - Significant Activities and Accomplishments	“Additional information is needed . . . on . . . [how] “Public meeting locations . . . are accessible to all people with disabilities”	ACL is adding clarifying language, “include people with disabilities” under Subpart V, Section C, Item 1 because that is where public meetings is described.
NCIL	Subpart VI - State Plan for Independent Living (SPIL) Comparison and Updates, Other Accomplishments and Challenges of the Reporting Year, Section B - Significant Activities and Accomplishments	“Additional information is needed . . . on . . . Materials available electronically must be 508 compliant and, upon request, available in alternative and accessible format including other commonly spoken languages”	Added under Public Meeting requirements
NCIL	Subpart VI - State Plan for Independent Living (SPIL) Comparison and Updates, Other Accomplishments and Challenges of	“SILC State Plan resource plan . . . needs [to be] beefed up [to ask]” a. how negotiations were conducted b. all sources and	Adding funding challenges under Substantial Challenges section.

	the Reporting Year, Section B - Significant Activities and Accomplishments	amounts of funds c. whether the SILC considers the total amount sufficient, and, if not, then why	
NCIL	Subpart VI - State Plan for Independent Living (SIL) Comparison and Updates, Other Accomplishments and Challenges of the Reporting Year, Section D - Grants or Contracts for Purposes Other than Providing IL Services or for the General Operation of Centers	"DSE should have to explain in the PPR how [DSE] [ensures] that [it] (and all other state agencies, offers, and entities) do not interfere with the operations of the SILC"	ACL is including DSE assurances.