

Office of Independent Living (OILP) Monitoring Overview: SILCs and DSEs

Overview

ACL monitors Statewide Independent Living Councils (SILCs) and Designated State Entities (DSEs) as a key component of ensuring adherence to the SILC Indicators and DSE Assurances. This monitoring is grounded in Title VII of the Rehabilitation Act ([29 U.S.C. § 796c](#)), implementing regulations at [45 C.F.R. Part 1329](#), and federal grant requirements at [2 C.F.R. Part 200](#). Under this statutory framework, functioning SILCs and State Plans for Independent Living (SPILs) are required for Centers for Independent Living (CILs) and States to receive Title VII Part B and Part C funds. For Title VII, Part B funds distributed by the DSE, ACL monitoring focuses on the DSE's administration and oversight responsibilities rather than direct monitoring of Part B-funded CILs. SILC/DSE monitoring focuses on four core areas: statutory role integrity, SPIL implementation, fiscal stewardship, and effective statewide coordination. The purpose of this document is to provide SILC/DSE with the framework for the monitoring process.:

Purpose of SILC/DSE Monitoring

- Assess compliance with statutory and regulatory requirements;
- Monitor outcomes achieved;
- Reinforce distinct statutory and regulatory roles of SILCs (29 U.S.C. § 796c(c); 45 C.F.R. § 1329.16) and DSEs (29 U.S.C. § 796c(d); 45 C.F.R. § 1329.11);
- Evaluate alignment of SILC and DSE activities with the approved SPIL (29 U.S.C. § 796c(a); 45 C.F.R. § 1329.17);
- Identify governance, fiscal, and administrative risks; and
- Provide training and technical assistance (T&TA) to support sustainable statewide independent living networks.

Triggers for SILC/DSE Monitoring

- Concerns identified through routine oversight (e.g., SPIL implementation issues, role confusion, ILS PPR reporting deficiencies);
- External complaints or referrals supported by sufficient information to warrant further review (sources remain confidential); Governance concerns, including SILC composition, appointments, or conflict-of-interest issues;
- Fiscal risks such as delayed payments, unresolved audit findings, or expiring funds;
- Breakdowns in SILC – DSE – CIL coordination affecting SPIL implementation; and
- Prior findings or incomplete corrective actions.

Monitoring Results & Findings

- Observations: Areas for T&TA, or improvement that do not constitute non-compliance.
- Compliance Findings: Documented determinations of non-compliance requiring corrective action under 45 C.F.R. § 1329.7 and applicable provisions of 2 C.F.R. Part 200.329.

Overview of SILC/DSE Monitoring Process and Estimated Timeline

Step	Action	Description	Timeline
1	Monitoring Notification	ACL notifies SILC Chair and/or DSE leadership, identifies basis for review, and schedules introductory meeting.	Planned or risk triggered (Initiated as part of planned oversight or based on identified risk factors)
2	Introductory Meeting	Review purpose, statutory roles, SPIL alignment, scope, and documentation requests.	Based on availability
3	Information Request & Review	SILC/DSE submit documentation; ACL reviews for statutory compliance, fiscal integrity, and SPIL alignment.	Up to 6 weeks (may vary based on complexity and responsiveness)
4	Findings Discussion	Discussion of observations and/or compliance findings and next steps.	Within 2 weeks of review
5	CAP Development (if needed)	Development of Corrective Action Plan with timelines and responsible parties.	Generally within 30 days
6	CAP Approval	ACL reviews and approves CAP or requests revisions.	Within 30 days of submission
7	CAP Monitoring	Ongoing updates and technical assistance.	Every 30–90 days
8	Closure	ACL issues written notification when monitoring and CAP requirements are complete.	Varies by complexity

Toolkit

- [ACL: Statewide Independent Living Council](#)
- [SILC Indicators and DSE Assurances](#)
- [State Plan for Independent Living \(SPIL\)](#)
- [45 C.F.R. Part 1329 IL Regulations](#)
- [2 C.F.R. Part 200 Uniform Guidance](#)
- [Independent Living Training & Technical Assistance \(IL T&TA\) Center](#)