Process for SPIL Formulation under WIOA

September 10, 2015

Presented by Ann McDaniel and Brad Williams

>> TIM FUCHS: Good afternoon, everybody. This is Tim Fuchs with the National Council on Independent Living. I want to welcome you all to newest CIL-Net webinar on the process for SPIL formation under WIOA. Today's presentation is brought to you by the IL-Net training and technical assistance program for CILs and SILCs. The IL-net is operated among a partnership among ILRU in Houston, Texas, NCIL here in Washington, D.C., and APRIL in north lower Arkansas and support is provided by the administration on community living at the US Department of Health and Human Services.   
So as always, we are recording today's call so that we can archive it on ILRU's website. That will be available in the on demand section in 48 hours, usually much sooner.   
And we are going to break several times during today's call to take your questions. For those of you that have done these calls, before you know there's a few ways to ask questions. I will review those quickly now and then I will remind you each time we take a Q&A break. So if you are on the webinar, as most of you are, you can type your question in the chat box. So you type your question out in the text box, under the list of attendees and hit enter. And you can do that any time during the call, and we'll just wait to address them during the Q&A breaks.   
If you have a technical issue, we will probably respond to you separately so that we can save the Q&A breaks for content-related questions.   
If you are on the full screen CART/captioning, that's the ccproductions link that was in the email. There's a chat box there as well. I'm logged in and you can ask your questions there any time.   
And then finally, if you are only on the phone today or if you are calling in and you prefer to ask your question live, you can press star pound during our Q&A breaks and that will put you in the queue to ask the question. Again, that's star pound and I will remind you each of those instructions each time we break.   
Okay. I also want to mention the PowerPoint. Obviously if you are on the webinar, that will display automatically, if you are only on the phone, or you have the full screen CART, then you will want to make sure that you have a copy of the power point handy. The electronic version was sent to you in that same confirmation email that you received with the connection instructions. If you don't have that handy for any reason, you can always email me at Tim@NCIL.org. And I will send a copy to you. Regardless of how he get, it you are definitely going to want the PowerPoint open for today's call. It will make it a lot easier to follow along with.   
At the end of the PowerPoint, there's a link to the evaluation form. The evaluations are very short but we take them seriously. It only takes a few minutes to fill out. If you are in a small group, that's great but we ask that each of you will, each individual that's participating today share your thoughts on the webinar so we can continue to improve these and give you all what you need.   
Also, one of you so that completes and evaluation will be selected to win a $25 Amazon gift card. Not a bad ROI on 30 seconds or a minute of your time to tell us what you thought. So don't forget that.   
Okay. With that, that's it for my housekeeping instructions.   
I want to turn it over to our presenters for today and with us, we have two tried and true SILC directors, tried and true SILC Net presenters. I want to welcome Ann McDaniel and Brad Williams back with us today. Ann, of course is the executive director of the West Virginia Statewide Independent Living Council. Brad is the executive director of New York's Statewide Independent Living Council.   
Both of them have long -- well, I shouldn't say longstanding but comprehensive and proven processes for developing the SPIL with input from around the state and have been really keeping their ear -- not just ear to the rail but also doing a lot of work on WIOA and the impact that it's had on SPIL formulation. And so I'm just so thrilled that they made time in their busy schedules to put together this presentation for you all today.   
And Brad and Ann, thank you so much for your work on this over the last few months. I will turn it over to Ann and I will go to slide 3 to get us started. Ann.   
>> ANN McDANIEL: Thank you, Tim.   
First thing that I would point out to you guys is while we do have WIOA and it does make some differences, particularly for centers and for SILCs, we don't have any guidance or regulation yet and so what we are going to start with for you guys today is looking at exactly what the law says about the development of the state plan, and the requirements for the state plan.   
Knowing that we will be getting regulations and hopefully guidance and perhaps a new preprint for what the SPIL ought to look like, but today we are going to start with what we know today which is what the law says.   
So the section of the law that deals with the State Plan for Independent Living is Section 704, and I have tried to put in specific references so that you can go back and look at what the law says under these specific sections, so you don't have to just take my word for it. But some of the requirements that are in there now for the State Plan for Independent Living include the joint development of the plan, which is not new, because many of you know if you have worked on a plan before, that it had to be jointly developed by the SILC and the designated state unit then. Now it has to be jointly developed by the SILC and the Centers for Independent Living in the state. So that's new.   
Many centers have probably never been involved in the SPIL development process. Hopefully many have at least provided comments and I know that in some states, including my state, the centers have always been involved in the process for developing our SPIL.   
The other thing that's in the law, along with joint development, is that you can't develop it until you have gotten publish input from individuals with disabilities. So that's a piece we'll talk more about, how you go about getting that public input.   
Also in Section 704, it talks about who has to sign this plan. It has to be signed by the chairperson of the SILC on behalf of the SILC, which means the SILC has to authorize the chairperson to do that. So they have to have seen and understood and agreed with what's in there in order to give that authority to the chairperson.   
The director of the DSE, which is the designated state entity, and not less than 51% of the directors of the centers for independent living in the state.   
Next slide.   
There has to be periodic review and revision of the plan, not less than every three years. Clearly, that gives you the option of reviewing it far more frequently than that, and a revision can be submitted at any time, as long as the signers agree that a revision should be submitted. The same process applied to revisions or amendments to a SPIL that apply in the original process of developing and approving and signing the SPIL.   
So the SPIL has to also include a way to address or needs to consider the needs in the state for the provision of independent living services, the development and the support of a statewide network of Centers for Independent Living, and if you already have what you consider to be a statewide network, this section would be where you would talk about are there unserved, underserved areas? Are there things that need to be done differently? Does the network need to continue to be built? Does it need more capacity? Those kinds of things.   
And you also have to consider the working relationships and the collaborations between the centers for independent living, programs that provide independent living services, and other community-based organizations and entities.   
The next section is talking about the submission of the plan, and the date of submission has to be 90 days before the completion date of the preceding plan. So the year we are in right now, we are entering October 1, the last year of the current three-year State Plan for Independent Living. That year, in September 30th of 2016 -- so 90 days before then is June the 30th of 2016. So that's when the new state plan will be due, based on what the law says, regardless of what comes out in regulation and guidance, we can know that the due date will be that 90 days prior to the completion of the previous plan.   
Next slide.   
We also have to consider statewideness in our plans. We have to have strategies for providing independent living services. On a statewide basis to the greatest extent possible. Now, remember that this plan basically is funded by the part B dollars, which is now sub part B, I think. So you specifically have to look at what you are going to do with part B dollars and what services that are going to be provided and how you can do that on a statewide basis to the greatest extent possible.   
There may being that your state has enough centers for independent living to cover the state, and you can talk about all of the services that are provided, but if you don't have enough funding to do statewide services you do have to talk about what you are doing to try to get there and to use that funding to the greatest extent that you can to do something statewide.   
The second -- the next thing that has to be considered in your plan is the Statewide Independent Living Council. Your plan has to describe the establishment of the SILC and how the SILC is located, you know, where it's located, how it's structured and it also has to include, pardon me, a plan for funding the administrative costs of the SILC or the SILC resource plan is what we call it. That's what it's called in the law, in another place, the SILC resource plan. That has to be included in your state plan.   
And then we have to include the designation of the state entity that's going to administer the funds. And what the law says is the plan shall designate a state entity of such state referred to in this title as the designated state entity as the agency that on behalf of the state shall and there's a list of things that the DSE has to do.   
Next slide.   
And that list includes: Receive, account for and disburse the funds received by the state under this chapter based open the plan. That's the part B dollars.   
Provide administrative support services for a program under part B, and a program under part C in a case in which the program is administered by the state under Section 723, and we'll talk more about that in a little bit.   
Keep such records afford such access to such records as the administrator of ACL, because that's the administrator that they are talking about, finds to be necessary with respect to the programs.   
Submit such additional information or provide such assurances as the administrator may require with respect to the program, and retain not more than 5% of the funds received by the state for any fiscal year under part B for the performance of the services outlined in paragraphs 1 through 4, which are a through d on this slide.   
Next slide.   
So we have pretty clear comprehensive list of what the responsibilities of the designated state entity are. We know that they have responsibility for receiving, administrating and reporting about the money, but how is the DSE supposed to indicate their agreement to fulfill these responsibilities?   
Our interpretation broadly are at the national level, independent living has been, that their significant on the plan indicates their agreement to fulfill those responsibilities. We have had some other information come out from RSA that -- not RSA -- pardon me! Old habits die hard. From the administration on community living and the Independent Living Administration, that the signature of the DSE indicates their agreement with the plan.   
We haven't gotten any further guidance about how they are supposed to indicate their agreement to you fulfill the responsibilities of the DSE and I anticipate that as we get additional guidance and the regulations when they come out, that this will be a bit clearer to us than it is now.   
Next slide.   
So also the state plan has to include objectives. We have to specify what objectives we hope to achieve under this plan. We have to have timelines established to achieve those objectives. We have to explain how the objectives are consistent with and further the purpose of the chapter. And that's way back in the very beginning of Title 7, Section 701 is the purpose statement of Title 7 and if you are not familiar with, that you really ought to look it up. I can tell you that the purpose statement has changed very, very minorly in the new version of the law. So if you have the old version of the law, go back and look at that purpose statement. Because that's the kind of thing you are supposed to be trying to achieve with the funds that are provided that are governed by this plan. So you want to know what it says.   
We have to think about what independent living services will be provided. There's a section about that. They have to be provided to individuals with significant disabilities. They have to be consistent with the rest of the plan. You know, how are the services going to build into the overall objectives of the plan? They need to be consistent. You have to keep the service provision in mind as you are looking at your own kinds of objectives and vice versa.   
Next slide.   
You have to deal with the scope and the arrangement of services, meaning what independent living services are going to be provided? Who is going to provide it? How are they going to provide them? Where are they going to provide them? As you are looking at who is eligible who makes sense to provide independent living services, what entities out there are there that can do them consistent with the intent of the law? Where are they going to be provided, meaning what part of the state are you going to use this funding to try to serve, when you consider it in collaboration with the other services that are being currently provided by your centers for independent living with other sources of money, you want to organize all of this so that it makes sense and you are not duplicating things and that kind of thing.   
Then you also have to talk about your network. The network of Centers for Independent Living that comply with Section 725, Section 725 of the act is the part that talks about in order to be a Center for Independent Living, and to be eligible to receive funding to be a Center for Independent Living, you have to have -- you have to meet these standards and assurances that are laid out in the law.   
And your network then is to consider having enough Centers for Independent Living to fully cover your state, that all comply with those standards and assurances and you have to lay out what your design -- set forth your design for the establishment of a statewide network of centers. If you don't already have a statewide network that comply with those standards and assurances, but also think about if you have enough centers to technically cover your state, are they really covering the state? What is unserved? What is underserved? Do they have the capacity to do all of that? And lay all of that out in your design for a network of centers.   
Next slide.   
Okay. Let's return to this concept of a 723 state. I don't know how many of you have heard the terminology or are familiar with it or understand it, so I thought we would talk a bit about that, to make sure you do understand.   
Okay. Section 722 is the section that talked about Centers for Independent Living, and what centers have to do and the funding that will go to centers. Section 723. Comes into play when a state provides more state funding for independent living than the federal funding that is provided. And the state elects to be a 723 state. If the state elected to be a 723 state, then the part C funding for the operations of Centers for Independent Living actually is awarded to the state and the state then grants it out to the centers to operate on.   
So if the state is eligible and elects to be a 723 state, then the plan has to talk about the policies and the practices and procedures for being a 723 state. And that govern how they are going to award grants of that funding to the centers for independent living to operate centers and how are they going to provide oversight of the centers to assure that the centers are in compliance with Section 725 and are really centers and are doing what they have been given funding to do.   
So there's a big difference between a 722 state, where there's more state -- there's more federal money than there is state money. Therefore the part C grants go directly from the federal government to the nonprofit centers for independent living. The federal government is responsible for monitoring those centers and providing oversight. And a 723 state, where the funding goes to the state entity, the designated state entity, and they then have responsibility for awarding the grants and doing the oversight, and you have to be really clear in your state plan if you are a 723 state how that's going to happen because the whole point of a state plan and a SILC is for that funding that comes to the state for independent living to be consumer controlled and for people with disabilities to have a role in deciding what's going to happen with, it how it's going to be used and what it's going to be used for. So in a 723 state, it's even more important to be clear about that in your state plan.   
Next slide.   
Now, beyond that, you have to talk about cooperation, coordination and working relationships among various entities. One of the things that changed in this section of the law is that it used to specifically say we had to coordinate with the state rehabilitation council. It doesn't say that anymore. It doesn't say you can't coordinate and cooperate with them and have a working relationship. It just doesn't specify them anymore.   
But we have to maximize those working relationships amongst the SILC and the centers for independent living and the designated state entity, and others like state agencies or entities that are represented on the SILC.   
If you have a variety of ex officio members on your SILC representing different state agencies, you need to consider how this whole cooperation coordination working relationship is going to work beyond just them having a seat on your council.   
Other councils that address the needs and issues of specific disability populations and that can include the state rehab council but it specifically is talking about the developmental disabilities council, if you have a council for behavioral health or mental health, any other commissioned for the deaf and hard of hearing, anything that's disability specific that exists in your state, you want to have working relationships with them.   
And then other public and private entities determined appropriate by the SILC. So that takes -- you know, that's a good place to spend some of your energy is looking at what are all of thos entities that are out there that we could, or should and are working with and how can we maximize that in the way we write our state plan?   
Next slide.   
You have to talk about the coordination of services. You are going to talk about what services are going to be provided under this plan. We already said you were going to do that. But you want to make sure that those services are coordinated with and really compliment other services that are being provided to make sure you don't have duplication with other programs, whether it's federally funded, state funded or locally funded. So you want to spend some time looking at what is already out there before you decide you are going to put a service or a service provider or a service network within your state plan.   
And you also have to talk about the coordination between the federal and the state sources of funding. If you have centers for independent living that are federally funded, and you have centers for independent living -- oh, federal funding can part C funding and/or part B funding to fund your centers. If you have state funding, that's funding Centers for Independent Living. If you have any of those sources that are specifically funding independent living services, well, how are you going to coordinate all of that, so that it all makes sense and you are not duplicating but you are building on what others are doing.   
Next slide.   
Then you have to have a section that talks about outreach and the steps that you will take to outreach to unserved population and underserved populations and those could and should include minority groups, urban areas, urban populations, rural populations, and somebody asked me recently how do you define unserved and underserved?   
And I really think it's based on what's going on in your state. You have to figure out what's unserved and what's underserved based on what's being provided in your state, and what areas of your state are served and what populations of your state are served. So that's something you need to take some time to look at, and spend some time defining so that you can include that in this section of your state plan, where you talk about how you are going to do your outreach.   
And then you also have to talk about the requirements for the service providers. There's specific requirements in the law that you have to ensure that the folks who are providing the services under this state plan are in compliance with. And those are included in Section 704 of your -- of the workforce improvement and opportunity act and innovation and opportunity, pardon me.   
They are in Section 704 (A) (3) it talks about the service providers. So that's something that you should look at as well as your looking at what you need to make sure you address in your plan. And if you don't include this section, you know, you probably won't get it approved. You probably have to go back and make sure that you made sure that you addressed it.   
Next slide. You have to have a whole section on evaluation. And I can't feature that that is not going to be in the new materials that come out from ACL because the law requires that you have a section on evaluation and it has to be -- you have to include your method and when and how you are going to do your evaluation, and the effectiveness -- you have to look at the effectiveness of the plan in meeting the objectives that you have laid out and consumer satisfaction.   
So you are really looking at, have we achieved the objectives that we laid out in the plan and is achieving those objectives actually resulting in the outcome that we anticipated would result? Which means a change in the lives of the people with disabilities who are being served.   
And then you also have to talk in your plan about how your plan is going to promote full access to community life. And that is a very broad concept. So you really have to look at the objectives that we have laid out and the outreach plan that we have laid out and the services that we have laid out. Are those actually going to promote full access to community life by the people who are served by the plan?   
Next slide.   
Then if you move on looking at what the law says about the SILC and the SILC's role in the development of the state plan, we are now looking the Section 705 (C) of the law and that includes the duties of the SILC, and it lays out specifically what the SILC is supposed to do. The first duty of the SILC is to develop the State Plan for Independent Living. Now, obviously, you don't do that by yourself, but it is the SILC's duty. It's the SILC's responsibility to make sure it gets done and that it's done in a way that complies with the requirements under Section 704. It also includes this section includes the authorities of the SILC, which is something brand new. We never had authorities before. We had duties that were kind of restrictive and now we have authorities that allow us to do additional things and particularly with this plan we are all getting ready to develop, you want to look at the SILC duties and authorities. They are very different than they were before. So what do you need to put in the plan that's different?   
You know, we have always been told that the SILC doesn't implement the plan, but I have been told and I'm fairly certain that this is correct, that if you want to do the things that are now authorities, which means you can choose to do them or not, you better put it in the state plan that that's what you will do because that's where you lay that out.   
This is something new and different that we haven't done before. So we all need to make sure that we take the time to look at those authorities. One is that we are going to work with the centers to coordinate the services with public and private entities. One is that we are going to conduct resource development activities. One is the catch-all authority is to perform other functions consistent with the purpose of the chapter, and comparable to other functions described in this subsection as the council determines to be appropriate. As you go back to that purpose statement in Section 701, that's a much broader catchment of things that the SILC can look at to say, well, what could we do that would help achieve this purpose?   
So you want to take the time to really look at that. The one thing you have to be very cautious about is that there is now a specific limitation on SILCs, and the limitation is that SILCs cannot provide services directly to individuals with disabilities and they can't manage services. So it still keeps it clear that for the service part of the plan, the SILC is not the one doing the implementing. And we want to make sure that we don't get caught up in some way of doing that.   
And additionally, the SILC has to develop the state plan jointly with the Centers for Independent Living. We have to monitor, review, and evaluate the implementation of the plan, and we talked a bit about what needs to be in you're evaluation section of the plan but that's a really important role of the SILC is to do the monitoring review and evaluation of the implementation of the plan, not of the service providers that are implementing the plan but of the implementation as in what are the outcomes and are we achieving what you are trying to achieve and then we have to submit reports to the administrator and any other information that the administrator may request of us.   
Next slide.   
I thought that's where we were. Questions, Tim.   
>> TIM FUCHS: It sure is. Okay. So, again, you can ask your questions by typing in the chat box or you can do the same on the full screen CART or you can push star pound if you are on the phone. We have some questions rolling in now. I will start on the web and then we'll go to the phone. Peter is wondering where do we find the list of the new authorities?   
>> ANN McDANIEL: The authorities are in Section 705, Section (C) (2). (C) starts out with functions and number 1 is duties and then Section 2 is authorities in Section 705 of the act.   
>> TIM FUCHS: Great. The next question is on the phone. Let's get that line open. And caller, you can go ahead.   
>> PARTICIPANT: Am I talking now?   
>> TIM FUCHS: Yep.   
>> PARTICIPANT: I had a question, as far as the joint development of the SPIL, is the state no longer involved in that?   
>> ANN McDANIEL: That's nothing that prohibited state from being involved in that but under the law the required people are the SILC and the centers for independent living in the state. You are certainly welcome to involve anybody else you want to involve, including the DSU or the DSE, if they are not the same entity or anybody else that you want to include. They are just not required to be involved.   
>> PARTICIPANT: Okay. Now, should I ask my other question too or not?   
>> ANN McDANIEL: Why not?   
>> PARTICIPANT: I'm working at 722 versus 723, in a situation with the 723 state, does that mean that the state is paying -- literally paying more money than -- and I'm thinking why would they? In other words if state can get -- if you can get federal money, why wouldn't you pay more money?   
>> ANN McDANIEL: You still do get the federal money as well. It's the instance where the state is providing even more money than the feds are providing. So you have a federal pot of money under part C and a federal part money under part B and then if you have state funding for independent living that exceeds those amounts, then the state has the option of being a 723 state. And so there are a lot of states where there's significant amount of state funding invested in independent living.   
At this point, there are only two states that are operating as 723 states that have elected to do that and those are Massachusetts and Minnesota.   
>> PARTICIPANT: Okay. Thank you.   
>> BRAD WILLIAMS: And this is Brad. I will add further comment on the participation of the DSE in the process in two more slides.   
>> PARTICIPANT: Okay. Thank you.   
>> TIM FUCHS: Great. Thanks Lori.   
So, again, you can type your questions in the chat box or hit star pound on the phone. I will give about 30 more seconds before we move on just to make sure that we don't miss anyone.   
Okay. Here's a question from Matt. Matt asks: If the 51% of CILs and includes both state and federally funded CILs?   
>> ANN McDANIEL: We do not have clear guidance on this. I expect that the regulations and any guidance provided around SPIL development will address this. At this point, I would say the one thing we know for sure is that it will have to be centers that are in compliance with Section 725. But in terms of their funding source, we do not have guidance or direction or regulation on that yet. I anticipate we will, though.   
>> TIM FUCHS: Okay. Great. Thanks, Ann.   
All right. I don't see any further questions. We are going to have three more Q&A breaks, including at the very end of the call. So for now, I'm going to go ahead to slide 17 and turn it over to Brad.   
>> BRAD WILLIAMS: Okay. Steps to formulate the SPIL. Identify tasks that must be accomplished, prioritize the tasks, establish timeline for completing these tasks and then work backwards from this submission deadline which we have established as June 30th, 2016 and allow adequate time for each step.   
Now in New York, we call in the SPIL formulation process, and we have a document with major steps with timelines.   
If you go to the N YSILC website, www.NYSILC.org, at the top of the page is our public notice and at the end is a link for our SPIL formulation materials. Which includes the SPIL formulation process, this updated timeline that I'm referring to is the first item. And then there's a facilitation outline in current spill objectives but it gives you an idea of what we are talking about here.   
Next panel.   
Identify who will develop the SPIL. This SPIL team, I mean, there's many potential individuals, the SILC chairperson, other SILC members, and as Ann had mentioned earlier, I mean, it is a definition based on each state. Is it CIL directors or is it federal CIL directors? In New York state, we determined it to be federal CIL directors, okay? That's because when we discussed this, and we made a determination, we looked at it as centers for independent living.   
When you looked at our state plan, we have a designation of centers for independent living which are federally funded and state funded Centers for Independent Living. The way they separate them, state centers are service Centers for Independent Living, who do not comply with 725 regs versus Centers for Independent Living which -- who do comply with 725 regs. It's a determination at that point without the guidance each state is going to have to make and that's the one we chose to make.   
So for, us it's going to be federal CIL directors. Other CIL representatives, the staff, the SILC staff, the director, other staff, and should the DSE be included?   
Well, in New York, our state plan or our SPIL committee serves this purpose and during SPIL formulation and development and both DSE members are on the SPIL committee. We also happen to have emeritus members on the committee as well. We feel they serve an excellent, you know, role.   
So at the bottom of this panel, see the note and the link about the ACL guidance about the selection of designated state entity. That might help provide some guidance at this time.   
Next panel.   
Identify the DSE. What process will be used? Evaluate potential DSEs. Negotiate with them. Research state requirements for establishing the DSE and then reach agreement. Do what is appropriate in your state. In New York, we have it boiled down to two questions. What state agency is best to serve as DSE October 1st, 2016? And what state agency is best to serve as the DSE of the future?   
If a DSE is not in place October 1st, 2016, you are going to have some issues. So you have to think through several considerations. It's going to be different in each state, but hopefully, you know, you have been going through this and this is how we are going to do it, and we're going to kind of pose these two questions during the public forums and get the feedback and then we are going to take this information and use it and put that in our SPIL, our draft SPIL because that's what we are going to put forward, and that's what we are projecting, that we are going to need in a transitional way a DSE that's ready October 1st, 2016. So we have an effective plan and then potentially we could need a DSE for the future. That's the way it's going to work for us, and I think everyone has to do what's going to work for them.   
Next panel.   
Elicit public input. Identify methods for soliciting this public input. There are different ways of doing that. We have listed them down there, surveys, focus groups, public forums, facilitated public meetings, other. You compile all public input and you put it all together.   
New York needs assessment priorities are used with public input priorities to validate the content of the SPIL during development.   
Next panel.   
And then you draft the SPIL. Identify all tasks to be completed, divide the work among the team. I mean, do you use a committee to do the work or are you like the lone drafter?   
Do you have consultants to assist you with specific sections or tasks? Perhaps some of the work can be accomplished on the more boiler plate sections in advance. Perhaps some of the sections just need verification or updating, okay, and they can be delegated out. Okay?   
Try to devise the best way to approach drafting your SPIL with the talent and the resources available. And Ann in the previous section went over new sections, Sections that we are going to have to consider and we're probably going to have to develop new. So maybe you can make notes of or we will have to consider statewideness or some of these other new areas, and we're going to have to develop narratives related to them. So there might be, you know, ways of delegating assignments to all of these new areas. All of these things have to be taken into consideration.   
Next panel.   
What do you want to accomplish? For the objectives, be specific. Make sure the objectives are measurable. Include indicators of progress and/or achievement. I highly recommend you work with a consultant or someone knowledgeable with the logic model.   
If you haven't already been able to do this, someone, you know, who knows the evaluation process. You know, outcomes and targets will then be connected in Section 7 of the SPIL, and Ann had made reference to this. You know, remember that SILCs not only jointly develops but then views, monitors and evaluates the progress of the SPIL.   
Next panel.   
What services will be provided. What services are currently provided? Consider unmet needs. Listen to public input. You know, what can you realistically do? In New York, our SPIL committee reviews needs assessment and public input priorities. Then we meet weekly to reach consensus on the key elements of the draft SPIL. It really comes down to what is realistic with the available resources?   
Next panel.   
Who will provide the services? Who is currently providing them? Who can provide the identified services and then all must meet the requirements in Section 704 (M) I have to be honest, I mean, in this -- citing this reference, Ann and I worked on this. Ann did a lot of work on this webinar. I had to even go back after 16 years and connect to this. I mean, Section 704 relates to the state plan and (M) identifies requirements such as one, notifying the CAT program, two, affirmative action to employ qualified individuals with disabilities, I believe that's Section 503. Three adopting fiscal controls. And four, it's a wide variety of items related to maintaining records. That's what also connects to Section 6 of the state plan.   
Next panel.   
How will the part B money be used? Or how is it currently being used?   
You know, we take this back just a little bit, you know this is an ongoing process when you develop a state plan and then you review and monitor it and evaluate it. It's an ongoing cycle, right? And you evaluate it because you want to look at how things are going. And what is -- what is working, what's not working. So that's why you want to look at your current SPIL. You want to evaluate it in order to see, you know -- see what the results are and what is, in terms of the current objectives, going well.   
So you need to do that, even that's why when I made reference to our materials, what we posts, we put down the information, if you do check that out, the current SPIL objectives and actually the status of them, which I think is something that is useful.   
How much of the funding will be needed for each objective and/or service and what can you realistically do with the funding available?   
This is where the final priorities get reconciled with the available resources.   
Next panel.   
Okay. The statewide network of CILs. What is the existing network? How many CILs do you have? Where are they located? What are their service areas?   
I mean, this is often connected to Section 3.1 of the SPIL, the existing network.   
It's often a matter of how you want to work with this. You can maybe take what's in your current plan and try to update and verify the information. Anything to try to, you know, obtain information, any method that you have might have to -- to produce the results. Maybe in your needs assessment, but then you get down to a question such as what are the unserved areas, where new CILs or satellites are needed, where the current capacity to establish a CIL satellite, in an identified area or how much funding would be needed. Perhaps that might shift to something like where we have a facilitation outline set of questions where we go out to a session, or a public hearing and we try to obtain input. You have to decide what you have available to you and where you might be able to gain useful information. You are utilizing the methods that you have available to you. Ways that you can get the feedback that you need to help you get the useful information for your network.   
Next panel.   
And this is really an expansion of this same topic. It's the statewide network of CILs, what is the minimum funding for existing CILs or the minimum funding level to start a new CIL and then the design of an ideal network. Are the current CILs service areas realistic? Prioritize where to put a new CIL or satellite, or new funding with received, prioritize where, and how to use it and how will it be distributed?   
That kind of segues into Section 3.2 of the SPIL and, again, you might want to decide how you can best obtain information or feedback during your open period. Can you get it online? Do you do it through a survey? Do you use some type facilitation outline?   
If you just ask for open comments, you will get open comments, but if there's a way that you can structure or facilitate some line of questioning, you might get feedback in this way, along some of the lines of three questions that will help you to -- to get some really targeted results along these lines that will help you to get information that will provide, I think, better results towards the network, because otherwise, you are just trying to design to the best of your ability. So, you know, hopefully you can get this, you know, and find it utilizing the methods that are available to you. So next panel.   
SILC resource plan. What amount is needed? What funding is currently being used? What can potential DSEs bring to the SILC resource plan? And then if part B funds are used, then you have a new requirement with a 30% kind of mark where it says do not use more than 30% unless you can justify why more than 30% is required.   
And what additional sources of funding are available?   
Basically the more proactive you can be with your SILC resource plan needs, the greater the likelihood you will achieve your desired result. If you wait until the end of the process to address the SILC resource plan, you are just going to end up getting what's left.   
Maybe what you should do if you are looking at this whole process is to look at your committee structure. If you have -- if you are starting off with a state plan committee, and the state plan standing committee is engaged in numerous activities in terms -- in terms the entire state plan and they are already looking at everything else that we have already discussed, they very well could think, you know, oh, God, we have to do the SILC resource plan. Perhaps you have a finance committee. The finance committee could pick up the SILC resource plan, identify the overall -- the total need and then work from there. And maybe once they have the total need, they can start addressing the 30% question. Is it less than 30% is? It more and then maybe start justifying, you know, if it's more the rationale for that.   
Perhaps if the DSE is still vocational rehabilitation, they could start having discussions about -- if INE funds are not currently on the table, you know, supplementing the funds with I & E funds. There's many things that they could do.   
And something that Ann had talked about previously, if you want to do resource development, it is now an authority. However, it must be in the SPIL, and you have to develop a process of how to approach it. You know, you are going to have someone start to draft that. Do you want to recommend that the SILC has a development committee? A development committee that defines a resource development, a general resource development plan consistent with mission, that sets you on a path forward? These are the types of things you are going to have to consider and move forward with.   
Next panel>> TIM FUCHS: Okay. That's our next Q&A break. All right. So one more time, if you have a question, you can press star pound. To ask a question on the phone, or you can type your question in the chat.   
We are waiting to see if any questions come in. I just want to highlight Dana, during the presentation asked if there was a basic logic model that ILRU or NCIL recommends and logic models really need to be developed from the ground up, but we spent a lot of time on outcome measures, and even specific to the SPIL, and so there in the chat, on the webinar, you might see that Sharon and I mentioned that on the on demand piece of ILRU's website, which is kind of a one-stop for all of the archives of different IL-Net trainings that SPIL -- developing an outcomes focused SPIL in three parts is really a great place to start.   
So I just thought that was a good question and didn't want that to be missed.   
It looks like we have a phone question that's come in.   
So let's go to the phone and caller, we'll open up your line. You can go ahead.   
>> PARTICIPANT: Hi. On the -- are we going to -- is there going to be, like, a table of contents that we can look at when we want to develop the SPIL, talking about all of these new sections and everything? It seems like --   
>> BRAD WILLIAMS: Well, I had heard, of course, this is at the NCIL conference, what I had heard is that the -- the SPIL template is going to remain the same, because there's not enough time to change anything, and we would get guidance of how to incorporate these new sections and where to put them.   
>> PARTICIPANT: Okay.   
>> BRAD WILLIAMS: But that's unofficial. That's unofficial and until we receive something, you know, that's official, that's what we should do. So what we should do is we should plan for these things to the best of our abilities, and then wait for the official word to come to us. Right?   
And I think that's best that any of us can do is that, you know, for like a section an statewideness, kind of plan for something like that and then just wait to receive some kind of correspondence that tells us where to insert it and then if there's anything more that accompanies it, then we can make an adjustment and then know where to insert it, and similar things would go, like for authorities.   
Like some of us want to do some of these optional items, see if we get any more guidance about how to structure them and say I want to do resource development. You heard how I might want to even structure it, and see if I need to do anything more, and then see where I might need to insert it.   
Does that make sense?   
>> PARTICIPANT: Yeah.   
>> BRAD WILLIAMS: Okay.   
>> PARTICIPANT: Then there was something about the state being involved with the plan or there was a slide, should the DSE be involved and was that with -- I can't remember exactly what it was, but the question was --   
>> BRAD WILLIAMS: Yes, I think we are in this similar kind of vacuum, you know, on some of these issues.   
I think we are beginning to move towards -- you know, it's the law kind of says one thing. The guidance is beginning to say another. So there's reference to the guidance and people who were at the NCIL conference were hearing that on this particular issue you are talking about is that, well, you know, involvement of the DSE and the DSE with the ability to sign. You know, we are waiting to hear on the guidance. So when this doubt, contact -- contact the ACL.   
>> PARTICIPANT: But if the money is coming through the DSE, the money person should be at the table. How could they not be?   
>> BRAD WILLIAMS: Right. And then I think it's a state item. Because a lot of the things -- and Ann gave a webinar in July about relationships. A lot of -- any time you have a -- you know, here it is, this is about formulating and developing a plan based on partners and any time that that is the reality, it's based on relationships. Okay? And between the partners. So it's probably a very wise thing to make sure that you have working relationships with your partners.   
>> PARTICIPANT: Yeah. Because ultimately, they are going to be held accountable in the money is not spent correctly because the money is coming through them, right?   
>> BRAD WILLIAMS: Right.   
>> PARTICIPANT: So they have to be at the table, period. I don't know how they couldn't be.   
>> BRAD WILLIAMS: Yeah, I mean you want to have communication -- I mean, there's many things that you want to have happen and you want to have working relationships going no matter who the partner is, and communication going and -- it doesn't say that you can't have differences, and you can't disagree on things and you -- you know, but at the same time, you have to be able to work through.   
>> PARTICIPANT: Collaboration.   
>> BRAD WILLIAMS: Yeah.   
>> PARTICIPANT: Okay. Thank you.   
>> BRAD WILLIAMS: Mm-hmm.   
>> TIM FUCHS: Okay. Thanks, Lori. Thanks, Brad.   
Brad, help me with this next question. One of our web participants asks: The resource plan, if it needs more than 30% part B really needs to -- in response to the objectives in the SPIL. We know what part B and the resource plan are but I'm not sure if you can help dicipher that question on the screen there.   
>> BRAD WILLIAMS: Right. Right. What happens is it's 30% is in relation to the total part B allocation, I believe, is the clarification. The comment is so that we make the clarification online to everyone that it's 30% of the total part B allocation. So whatever it is, your total -- your state's total part B allocation is, the SILC's resource plan -- total part B amount can't exceed 30% of your state's total amount. Okay?   
So if your state's total amount is $1 million, then it can't be -- then your SILC resource plan can't be more than 30% of $1 million. Right? That's what we are saying.   
>> ANN McDANIEL: And this is Ann, unless you justify in your plan why this needs to be more than 30.   
>> BRAD WILLIAMS: Correct.   
>> ANN McDANIEL: And the question here also talks about tying it to the objectives but the SILC resource plan is all about the SILC having the resources it needs to fulfill its duties and whatever authorities this is going to implement. And you want to make sure that you outline those in the plan, what authorities you are going no go for, but remember that we don't know where that's going to go yet, whether it's going to go in objectives or whether it's going to go somewhere else. Maybe it's going to be in the resource plan, we don't know. But we know we need to be prepared to provide that information and hopefully we are going to get guidance about exactly where it ought to be plugged in.   
>> TIM FUCHS: Okay. Great. Well, thanks for clarifying.   
Okay. Just in the interest of time here, I will go ahead to slide 30, and turn it back over to Ann and, again, we will have more Q&A breaks in the call today.   
>> ANN McDANIEL: Okay. Cool. So when we're looking they steps these we are recommending you go through in order to develop your plan, Brad's taken you through a lot of the beginning of the process and now we are to the point where we need to develop a fuel first draft of the plan. Your first full draft of this SPIL, what is that going to be. You have to identify who will stay responsibility for the team that's been working on it, into the SPIL format, into one document. Brad suggested you may want to have subcommittees that are working on specific sections and you are going to divide up the tasks and the responsibilities.   
Well, this is the point at which all of that needs to be pulled together into a state plan. So who is going to do that part? And it's up to the team to decide that.   
And then the full team really has to look at that whole draft, once it's all been merged into one document, then the team needs to review it and make sure that all the work is there, and everything we agreed upon has been captured, and that this draft plan really does say what we meant for it to say.   
This is your first full draft of your State Plan for Independent Living.   
Next slide.   
So once you have that draft, this is another point at which you have to get input from other people. So you have to put your draft out for public comment and you have to solicit feedback on that draft. You can't just say, oh, here's our draft. Let us know what you think. You have to actively solicit feedback. So you have to decide how you are going to do that. What formats are you going to use to solicit that feedback and to accept feedback and comments on your draft?   
First of all, you know you want to get feedback from the team, the whole team, and all of their constituencies. So the members of the SILC, not just the SILC members who are on the SPIL writing team, but the whole SILC needs to have an opportunity to give feedback on the draft. The centers for independent living, not just the directors that are on the team, but the staff and the board members and the consumers of the centers need to have an opportunity to give you feedback and you need to solicit that feedback. And your designated state entity is another place you need to solicit feedback.   
You need to think about what mechanisms you will need to do that.   
Next slide.   
Next slide.   
So are you going to have public meetings? Are you going to do some kind of online format? You can post your plan online but are you going to set up some kind of mechanism online for people to be able to review it and provide input and comment and feedback on that draft? Are there other ways you can do that? Do you want to have focus groups? Do you want to have surveys? How are you going to do it? Who is going to do it? Those are things that your team needs to Kaz part of the planning process.   
And then, of course, you will need to provide notice to the public, that comments are being accepted, that the draft is available, you are looking for comments and give people a deadline to get the feedback to you, because then you have a framework for putting all of that together and taking it back to the team for your final look at what the SPIL ought to include.   
Next slide.   
Once you have done all of that, you've got all of your comments, all of your feedback. You want to pull that all together and this whole SPIL team needs to review.   
It consider all the comments that have been received. Are there any revisions that need to be made to this draft in response to the comments that you have received. What are they? What very visions are needed? And how are you going to get those made?   
And then once you have done all of that, you have a final draft, and this is the draft that everybody is going to consider for approval. So it has to be provided to the full team, the writing team of the state plan, to the full membership of the SILC, to the centers for independent living, and to designated state entity.   
Next slide.   
So what's the process going to be for getting approval? For the Centers for Independent Living to provide approval, the network of centers identified in the plan need to be included in that process. There has to be a process for the centers to review that final draft. And then there has to be a process for centers to indicate their agreement and/or their concerns. Because, remember, you have to vat leaf 51% of the directors of those centers to sign your plan. So you need a process for how the centers are going to actually approve it before they sign it. Next slide.   
Same thing with the SILCs. The SILC has to sign it. They have to give authority to the chairperson to do that. So what process are you going to use for your SILC to review that draft? Obviously all the SILC members are going to have to be provided with a copy of the draft. I strongly recommend that the draft be discussed at a full SILC meeting, so that everybody has an opportunity to say what they think and have conversations and get clarification so that they can decide what they think is this -- is this what they think it ought to say. You need to have all the volunteering members of your SILC vote on whether or not you need to vote. And you need to authorize your chairperson to sign the state plan on their behalf. If they have agreed, yep, we approve this, then they have to give authority not chairperson to actually sign it.   
Next slide.   
You need to get a process in place for securing signatures. This can be tricking, depending how many crenellers you have in your state, and where your chairperson lives. They have to sign it at the direction of the SILC. So when and where is that going to happen? At least 51% of the center directors in the network identified in the SPIL has to sign it. So what is the process going to be for doing that, to make sure you have all of those signatures on hand? How many center directors are allowed to sign it? Can you have them all sign it if they all agree on it? Can you only have 51% sign it? We don't know. That's something we need to pay attention as guidance comes out.   
But you know you have to have at least 51%. So you have to make sure that you have a process to get those signatures secured and then the director of the DSE has to sign it.   
So you have to make sure that you have a process to get that signature secured. Some people say what if they say they agree, do you have to have a hard copy the signature? Traditionally the state plan, you have to verify that you have the hard copies of signatures on hand, that you could provide them to the commissioner of RSA then, and to the administrator of ACL now. If they say they want to see the signatures, you have to show them the signatures.   
You have to find a way to have the signatures in hand and in a format that can be provided. Next slide.   
Okay. This one we don't know all the answers to this yet, but actually the process of submitting the SPIL, we are going to have to see what comes down by way of guidance and mechanism to do this, but who is actually going to do the submission? We've been doing submission electronically. The person who actually sits down at the computer to do that has to have the authority no do that and the ability to log on to the system to do that. Is there going to be a system? With don't know. We know the RSA system is not there anymore and probably shouldn't be in. That's fine but how is ACL going to do this? So who will do the submission and what's the process going to be like? We don't know.   
And who is going to have access to that process, we don't know. This is all stuff we have to wait for guidance on. But as Brad said, we pretty much have to move forward with writing a state plan. We United States the format we go. We make sure that we include all the things. When the guidance comes we know where they are and we can plug them in. The same thing with this process. We don't know what it will be yet but had has to be ready to be submitted and then when we are told how, who, and when, we will submit it. So we have to move forward on that assumption.   
Next slide. We are to questions again. We are getting short on time!   
>> TIM FUCHS: A bit. We can get through it, though.   
Dana has the next question. Ann, does the SPIL require memorandums of agreement between the different organizations?   
>> ANN McDANIEL: The SPIL has not in the past required that. The law doesn't require that. I don't know what the regulation and the guidance from ACL is going to be around that. There's nothing that prohibits you from having memorandums of agreement. So if that's something that your team thinks is important, there's no reason you can't do that. It's currently not required and it's another one of those things we have to wait and see what we get in terms of regulation and guidance to see if that's going to change.   
>> TIM FUCHS: Okay. Great. Thanks.   
I'm just going to give about 10 more seconds here to see if any more questions come in because we are a little bit short on time and we are going to have a final Q&A at the end as well.   
Okay. I don't see anything on the phone and I don't see anyone typing. So Brad, I'm going to turn it over to you.   
>> BRAD WILLIAMS: Nope.   
>> TIM FUCHS: Oh, I'm sorry. I forgot about 39 to 42. Okay. Ann, I will let you continue on slide 39, how about that?   
>> ANN McDANIEL: That's fine. We will spend a little bit of time here. We will talk specifically about what we are doing in West Virginia in terms of process. Next slide.   
We have a team. It's established. It's been meeting. We had a meeting today. We have three members of our SILC on there. We have the former chairperson of our SILC on there because she was interested. We have all the center for independent living directors in the state on there, and they all get part C grants in addition to some part B funding. We have the DSU liaison and I'm specifically saying DSU because we haven't specified into our state plan who our DSE is going to be. I think it will be the entity that serves at DSU for the vocational rehabilitation program and I want to be really clear that the DSE is not a new name for DSU. The DSU still exists under the vocational rehabilitation section of the law, and still required to exist and going to continue to exist unless the law changes. So that's who our previous entity to receive and administer the funding is. We are including them at the table and as we have the conversation about DSE, they will be a part of that conversation.   
I don't think we are going to be selecting someone else at this point. And the SILC executive director is part of the team, that's me and I'm including the rest of my staff on the team because I think it helps them to have a better understanding of what we do and why we do it, particularly as we move forward looking at these new duties and authorities and what are we going to do differently from here on out? I want to make sure that they are at the table and have buy-in from the very beginning.   
Next slide.   
Our timeline has been established. You have it in front of you. I don't really think I need to read the whole thing to you. But basically we have got a team. We've got -- we will be holding public forums and we have the plan for that in place. We will start drafting content in October. Our intent will be to have a draft to all the partners, including the SILC, the full SILC in February and then we'll have another period of gathering public feedback and comment. And get that thing finished up and ready for approval. It will be my goal for the SILC to approve it at their June meeting which will be June 1st. And then I will hopefully within a couple of week's time be able to secure all the signatures. At the same time that we are going through the processes, I'm going to have to make sure that the centers are going through whatever process they are going to go through, to approve the plan, and the DSE is going through a process to approve the plan so that by June 15th, I can get all of signatures secured.   
Our final deadline to have it ready and start to submit it to the feds is June 22nd and that's because in past experience, it we have to do it in an online mechanism, it tends to get really bogged down, the closer you get to the due date. So I try to start early and get mine in so I can get it done in one day instead of it taking me a week because of the system being bogged down.   
Next slide.   
Additional things that we have done, I told you we have dates and locations for all of our public forums. We have interpreters on hold for all of our public forums. We have a council member and myself scheduled to be at each one of those meetings to facilitate and record all the comments that we receive. And we actually today went over the results of our most recent consumer satisfaction survey and whatever needs information we have on hand, unmet needs so that we can consider all of that as we move forward with development.   
Next slide.   
Brad, it's back to you.   
>> BRAD WILLIAMS: All right. Thank you, Ann. So I'm going to do a similar thing where I will just summarize what we have here. So the first bullet is SPIL evaluation. So that's where you start off. And, you know, this is where you identify objectives that are doing well, that are kind of average, and the ones that are having difficulty, because, you know, that's important information going forward. And it's also going to be one of the documents that is in your SPIL formulation material. So you get into the second bullet and that's about the needs assessment committee, NAC as it's developing, what it's going to be, it's a process to develop the next report which we are heavily engaged in that right now.   
If you go back to the N YSILC website, the second item on the home page is the link to the survey, the consumer survey. I mean, it's four questions. And one of the questions asks about a lot of the needs, the consumer needs and the consumer survey is still active. There's also a survey to assess center needs and that is out to the center network. And that's going right through the end of September.   
It's important, the needs assessment, you know, report that comes out, because it identifies priority needs, unserved, underserved geographic areas and target populations. They will directly connect the sections of the state plan, 1.2b, 2.1b, and 3.1.   
Then the SPIL committee does the outreach materials. I already commented on that. You can see those materials at the top of our home page.   
And then receiving the public input, we are doing it now. I mean, next week, we start off with our state association and we facilitate a session and you can look at that public notice and see where we are going to be. We utilize the facilitation outline that helps to solicit the comment for all the different types of methods. We received over 500 comments last cycle.   
Next panel.   
And then, you know, the needs assessment report will be finalized going into November. We will take that, and the SPIL committee going November to December look at the public input and the needs assessment priorities identifies final priorities, objectives in funding. They will meet weekly, for each consensus and key elements of the draft SPIL.   
Now, this is where this changes. That last bullet doesn't apply anymore. This has changed. In January of 2016, we are going to draft a SPIL with assistance from our consultants and like our committee. In February of 2016, we are going to post and receive comments on the draft SPIL. It will include -- it will include a webinar event at one accessible location. We will review comments for friends and make adjustments.   
Next panel.   
So the previous two steps were impacted by the changes and so the new steps concerning WIOA, very a couple of adjustments here. So January is when we draft the SPIL. February is when we were going to have our webinar event and advanced process and then it gets back to what's the process that's kind of stated here. March is when the federal CIL directors review and approve the draft SPIL. April is when the SILC reviews and approves the draft SPIL. April -- or what's left of April through May is the technical review of the draft SPIL, and I hope you all realize that this is an evolving process that requires planning, but, you know, within an ability to make adjustments, when necessary.   
Next panel.   
And the partners then sign, you know, the SILC chair, the federal CIL directors and the DSE and then the DSE affirms their administrative duties and on, and transmitted to ACL by the June 30th, and then remember, you know, August, September, we review drafts, SPIL with ACL possible negotiations and technical edits. Hopefully we get that new SPIL approved by ACL by October.   
Next panel.   
What did we have to add or revise related to the SPIL formulation process? You know, it's review of the draft SPIL with the IL network partners in the webinar event, the January drafting process, February review comment period. A federal CIL director voting process, an arbitration process if necessary and any additional time and flexibility.   
Tim, I'm going to turn it over to you.   
>> TIM FUCHS: Sounds good. Thanks, Brad. So I talked to Brad and Ann at the beginning of the call. I'm clicking to slide 50 here which is their contact information, but I just wanted to add that last Q&A session so that you all had a chance to ask questions before we finish up today.   
I know Matt was wondering, Brad, if you all in New York would be willing to make your facilitation outline available? Is that something that is possible to share with other states?   
>> BRAD WILLIAMS: Yes, that if you go to www.nysilc.org, at the top of the home page is our public notice. You go to -- you get to the end of the public notice and there are two links, first link is the SPIL's formulation materials. Click on that link and you will get, like, three different items. The first item is our SPIL formulation process, but the second item is the facilitation outline.   
>> TIM FUCHS: Great. Thanks Brad. That's perfect.   
Okay. Great. Well, thanks to Brad for sort of breezing through that last section so we had some time. So if you all have other questions, please fire away. We still got three minutes left. Again, you can press star pound on the phone or type your question out.   
And, Brad, Dana is wondering about that online survey. Is that available at nysilc.org?   
>> BRAD WILLIAMS: Yes, first the facilitation, the SPIL formulation materials, the second link is so people can directly send us comments and then after that, is the Survey Monkey survey with a link to a Word version so that people do not care for, you know, Survey Monkey for whatever reason, including access, even though they've, you know, improved greatly. They can send it into us. So, yes, that's the next item is the consumer survey for New Yorkers with disability.   
Someone could check it out if you wanted to click on it. First the messaging and then click on it and then print it out, if they wanted to see the questions.   
>> ANN McDANIEL: If they wanted to borrow it and use it. That's what I'm thinking.   
>> TIM FUCHS: Dana says thank you, Brad. That's very comprehensive. Indeed, it is. And that's great. I know you guys have a history of sharing your SPIL process and documents on your website and it's really helpful. I know you do it for those in your own state, but it's great for other SILCs that are looking to borrow and learn.   
>> BRAD WILLIAMS: Right. And we have some excellent consultants that help us. Alan Krieger, who is our evaluator, also assists with us our needs assessment.   
>> TIM FUCHS: Great. Okay. It looks like there's a question on the phone and I think this is going to have to be our last question for the day but I will give instructions on how you can ask follow-up questions. Let's go to the phone for now.   
>> PARTICIPANT: I'm clicking on the evaluation and I'm having trouble accessing it.   
>> BRAD WILLIAMS: Which, are you talking about our SPIL evaluation?   
>> PARTICIPANT: I'm talking about the one -- let's see, click -- it says click the link below to complete an evaluation of this program. It says survey gizmo, webinar evaluation.   
>> TIM FUCHS: Oh, well, I'm not sure what's going on, Lori, but I will be happy to send you a copy of that link and if you have any problem, I can send you a Word version of the document.   
>> PARTICIPANT: That's great. Thank you so much. I appreciate that.   
>> TIM FUCHS: Sure thing. Sure thing. It looks like some others are having trouble with it as well. So we'll check that out and resend it and if there's a technical problem with the link, we will send a new link and/or a word version.   
Okay. I'm going to go ahead -- well, let me stay on this slide for a moment, Ann and Brad have both been generous enough to explain their contact information, if you all have questions.   
I want to just remind you of all of my information as well. My email is very simple. It's my first name, Tim@NCIL.org. And that's a big part of our role at IL-Net, those of us at the NCIL and the ILRU and the APRIL offices when these webinars are over to keep -- to answer any questions you all have as you sort of digest and implement what you have learned.   
So please do reach out if you have any follow-up questions, you know, which it be later today or months from now, we would love to hear from you.   
Here is the evaluation form.   
It sounds like some folks might have had trouble accessing this. I just checked it and I was able to it open it on my machine. We will look into it regardless. It's after 4:30. Let me wrap up. Thank you to all of you for joining us. I hope it's helpful as Ann said and you know, some of this will depend on the regs and we will be looking at, that and that will likely be a big part of our work in 2016 is to help dissect and analyze and work with those, to see what impact they will have, so be on the lookout for that.   
Ann and Brad, thank you so much for another great presentation today. Thanks to all of you for taking time out of your busy schedules to be with us. Have a wonderful afternoon.   
We'll talk to you soon. Bye-bye.

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