**SILC Composition**

**Presented by Mike Bachhuber**

**September 14, 2016**

 >> TIM FUCHS: Hi, everyone. This is Tim Fuchs with the National Council On Independent Living and I want to welcome you to today's on-demand presentation, SILC composition. Today's presentation is being brought to you by SILC Training and Technical Assistance Center, the SILC TATA center is operated through a partnership with ILRU, NCIL and APRIL with support provided by the Administration On Community Living. This is part of a series for SILCs that we're offering this September, and we are holding a live Q&A call for this and our other SILC topics at 2:00 p.m. eastern on September 28th. So if you're listening to this presentation before that date, I hope you'll go to NCIL's website and sign up for that. That's a free call. And I hope that you'll join.

 I'm going to turn it over now to our presenter for today, Mike Bachhuber, to go ahead and get us started on SILC composition. Mike is, of course, Executive Director of the Independent Living Council of Wisconsin. I'll go ahead to slide 3 and turn it over to Mike. Mike?

 >> MIKE BACHHUBER: Thanks, Tim. So in putting this presentation together we developed the following objectives for what we are going to talk about. First, we want you to know what the federal law requires for composition of statewide Independent Living councils. Second, we would like you to know how states implement the federal requirements. Third, what ongoing issues SILCs and states frequently face regarding SILC composition, including recruitment, orientation and outreach. And last, what are some effective practices for responding to those issues. I'm going to move to slide 4.

 We wanted to start with the legal framework for SILC composition. As with most of what we do as a Statewide Independent Living Council, the starting point is Title VII, chapter 1 of the Rehabilitation Act of 1973 as amended. This law, as you know, governs our federal Independent Living programs, both the state or Part B program, and the Centers for Independent Living, or Part C program. The law was most recently amended two years ago. Public law 113, 128 are the Workforce Innovation and Opportunity Act. There also can be federal agency regulations and other documents to provide guidance.

 I'm going to move to slide 5. So as most of the folks on this call should know, the department of Health and Human Services has not issued final regulations as of September 2016. We do expect that they will be finalized probably not before too long, so some of you watching this presentation and listening to it may actually have seen final regulations by the time you get to this presentation. In the meantime, though, we're looking at proposed regulations, proposed standards and indicators, and there's been one other item of guidance that the Administration On Community Living has issued since they've taken over the program a year ago. Amendments to the Rehabilitation Act supersede the old education department regulations. Those were located at 34 Code of Federal Regulations, CFRs, but until the department of Health and Human Services regulations are finalized, the old education department regulations may provide guidance, except where they were specifically overruled by an

amendment to the act.

 On other topics, those regulations have effect until withdrawn or replaced by department of health and human service regulations.

 I'm going to move ahead to slide 6. So other types of guidance that we have, when RSA was administering the program up until 2015, they had issued several guidance documents, including technical assistance circular 13-01 and Technical Advisory Circular 14-01. And ILRU has posted both of them on their web page. The link is on the bottom of this slide.

 The circular 14-01 provides guidance on federal requirements governing the Statewide Independent Living Councils and so there's a lot of information in that guidance that's relevant to these presentations. The guidance restates a number of legal requirements relating to SILCs and interprets a few areas the agency recognized as problems. We've also included a link to Technical Advisory Circular 13-01, and that was a more general guidance on what the duties of SILCs were prior to the 2014 amendments to the Rehabilitation Act.

 I'm going to go ahead to slide 7. So the bottom line above the Rehabilitation Act, the regulations and other guidance, the starting point is that states must have a council. This appears first in the section of the statute that deals with the statewide plan for Independent Living, section 704(b), but then there's section 705 which provides all of the legal requirements or most of the legal requirements relating to Statewide Independent Living Councils. Section 705(a) actually says to be he will jibl to receive financial assistance under this chapter each state shall establish and maintain a Statewide Independent Living Council. The "and maintain" language was added in 2014. And I think it makes it clear that just setting up the council in the first place is not satisfactory. The way the state implements the other more specific rules has to be done in a way that allows the council to maintain its ability to function.

 The act also defines who appoints members in section 705(b), and in most states that's going to be the Governor, but it does provide that in a state where state law vests authority for administration of the activity carried out under the act in an entity other than the Governor the chief officer of that entity may appoint members, and so there's a few states -- and when we talk about activities under the act, remember that most of the provisions in the Rehabilitation Act actually refer to the Vocational Rehabilitation program. So in some states they have a board of education or similar entity that administers the Rehabilitation Act activities and that's what that language refers to in those states that board of education or other authority will be making the appointments. I'm going to be moving ahead to slide 8. The act also sets appointment standards. So the principal language is in section 705(b) 1. The appointing authority shall select members after slis take

recommendations from representatives of organizations representing a broad range of individuals with disabilities and organizations interested in individuals with disabilities. So this is the first area where I think I want to go a little bit ahead and we'll talk about this more later, but one of the duties of the SILC is to advocate related to the specified duties of the SILC, and I would recommend, I think it's the best practice, that when staff for SILC starts and when any new term of Governor or other appointing authority begins you're going to want to set up a meeting with the staff for the appointing authority who handles appointments, because this is something that you'll find -- especially where the appointing authority is the Governor. The Governor may have dozens or even hundreds of boards, commissions and other types of committees that they make appointments for, and so they may not be able to actually do this soliciting of recommendations by themselves. So by setting up

an appointment, one of the things you want to talk about is how the SILC can and should make sure that this happens.

 The act also sets out requirements for the composition of SILC in section 705(b). There's a section on who must be included as members of SILCs, what additional members may be appointed to the SILC, what the qualifications for SILC members are, and what the terms of office are.

 I'm going to move ahead to slide 9. So for the mandatory members, the council must include among its voting members at least one director of a Center for Independent Living chosen by the directors of Centers for Independent Living within the state. Note the language "chosen by." So the best practice there is that the directors of the centers within your state get together through some kind of process and they will choose which member will represent them. In some states it could be more than one director of a center. That will be determined by the statute or executive order which sets up your council as to how many members of the council will represent the Centers for Independent Living in the state, but there has to be at least one, and that director or directors are chosen by all of the directors of the centers within the state. Now, they still need to be appointed by the Governor or other appointing authority. So I really wanted to highlight those two different pieces of

language that we have to work with. The appointed by and the chosen by. So once the directors have chosen their representative or representatives, then either the centers or the SILC staff can convey that -- the name of that director or directors to the appointing authority to make sure that they actually get appointed then.

 So there was also prior to 2014 a provision for another type of mandatory voting member. That was replaced in 2014. So now the inquiry goes: Are there more than one or -- are there one or more Centers for Independent Living run by, or in conjunction with, the Governorring bodies of American Indian tribes located on federal or state reservations in your state. We understand as of 2016 there's only one or two states where that occurs. But the administration on community living has also done a request for proposals to develop more centers to serve tribes in your states. So when you're watching or listening to this presentation, that answer might be a little different than it is as I'm giving it here in 2016. If there are one or more centers run in conjunction with a tribe, then at least one representative of the directors of those centers has to be appointed to the council. I'm going to move ahead to slide 10. So there's also language about nonvoting

mandatory members. The council must include as ex officio nonvoting members a representative of the designated state entity and representatives from state agencies that provide services for individuals with disabilities. It doesn't say all state agencies that provide services. So this is going to have to be a matter that is decided within your state which agencies are actually represented on the council. It probably will have been included in the statute or executive order setting up the council in the first place. If the council and the centers believe that the current representation of state agencies is not correct for where you're at at a given point in time, then you can advocate to get that changed, so in some states, for instance, you may decide that you want to add a representative of the state housing agency to be represented. Then that has to be included -- in most states that will have to be included in the statute or executive order setting up the council. There's

also language about other members that can be appointed to the SILCs, and it specifically talks about other representatives from Centers for Independent Living, individuals with disabilities, parents and guardians of individuals with disabilities, advocates, business representatives, service provider representatives, or other appropriate individuals. And, again, there will be a certain amount of discretion at the state level as to who might be included and ultimately the appointing authority, the Governor or other appointing authority will make the decision about who sits on the council. I'm going to move ahead to slide 11. So the act does specifically state what are the qualifications for council members. They must provide statewide representation. They must represent a broad range of individuals with disabilities from diverse backgrounds, they must be knowledgeable about Centers for Independent Living and Independent Living Services, and a majority of them must

be persons who are individuals with disabilities as defined in the ADA and who are not employed by any state agency or Center for Independent Living. The how you're going to ensure statewide representation is something that deserves some discussion within your council. We have looked at a couple different criteria, the primary one is is there someone on the council from each of the service areas for the Centers for Independent Living within our state?. And the council does try to find out who all the applicants for membership are and get involved prior to the appointments process. That again is one of the things that you have to work out with the staff for your appointing authority because when members are appointed they should meet the qualifications, and the council is in the best position to assure that. So the broad range of individuals from diverse backgrounds. The best practice, I think, is to both look at type of disability and insuring that all the major types

of disability are represented on the council, as well as more traditional diversity -- looking at more traditional diversity. So do you have different racial and ethnic groups represented on the council? Do you have both men and women represented on the council? You might want to look at what kind of mix of age groups are represented on the council. You probably want to look at whether you have a mix of people that represents urban, suburban and rural members that is commensurate for your state. And those are things that the council is in a much better position to look at and assess than your appointing authority maybe. The knowledgeable about Centers for Independent Living and Independent Living Services, I think it's important that you find people who at least have some kind of a basic understanding about what Independent Living is about, but this is also something that as long as you have a good orientation and training program you can make sure that members are knowledgeable at the point they're appointed and as you go along.

 The next slide goes into a little bit more detail about the majority requirement. So I'm going to move to slide 12. The law includes two separate consumer majority requirements. The first one, the one I referenced above, requires that a majority of all members be individuals with disabilities. The second requirement requires that a majority of the voting members be individuals with disabilities. And both of the requirements say that they not only must be people with disabilities but they also must not be employed by a state agency or Center for Independent Living. That's an issue that a number of states have gotten into trouble with. So it's something that we need to pay attention to to determine whether someone is employed by a state agency or a center you want to look at who pays the member. If they're paid by a state agency or a center, then they're an employee of the state agency or center. You also need to look at who controls the member's work. If a state agency

or the center controls the details of the member's work, then you should consider them to be an employee of the state agency or the center. And there may be some special circumstances. So we had an applicant, for instance, who was a student employee of a state college and weren't sure whrp person might qualify as an employee of a state agency. So we contacted our IL liaison and asked for an opinion on that, and the response that we got was if they're a student employee, we don't have to consider them to be a state agency employee, but if they're a regular employee of a State University, then they should be considered an employee of the state agency. So there may be kind of a few other weird circumstances like that that you may come in contact from time to time, but that's the best guidance that we can give as of now. And so I'm going to move on to slide 13.

 The act also prescribes terms of appointment for members. So terms of appointment are for three years, except that a member appointed to fill a vacancy occurring prior to the expiration of a term for which a predecessor was appointed shall be appointed for the remainder of such term. So that oftentimes happens in Wisconsin, and I know it happens in other states where the appointing authority is sometimes behind the curve on making appointments. So a term might expire first or someone may resign and then someone else is appointed to fill that term. In a case where a person resigns and has time left on their term, then the successor should initially be appointed to the same term for the remainder of the same term, and then in addition can be appointed to two more full three-year terms. There was also language in the act about initial appointments for when a SILC is first created. That generally will not be something that comes into play in too many states looking forward.

 Next slide is number 14. The general rule in the act is that vacancies are filled in the same manner as the original appointment. The vacancy shall not affect the power of the remaining members to execute the duties of the council. The appointing authority may also delegate the authority to fill vacancies to the remaining voting members of the council after making the original appointment. That's something that the Rehabilitation Act allows. Your state law may not allow that. So that's another thing that you may want to have a discussion with your appointing authority about.

 Slide 15. The law was amended in 2014 to allow the CIL director's representative to be appointed for more than two consecutive full terms if there's only one center in the state. In all other cases a person may only be appointed to two consecutive three-year terms. Now, this is where I go back to the guidance from RSA technical assistance circular 14-01. When RSA was admin strange the IL program this they would often be asked when can someone be reappointed when previously appointed to the council? The guidance they gave that once you've served your two full consecutive terms you may be reappointed after a meaningful break in service when a new vacancy for which the member eligible becomes available, but only after the appointing authority makes the necessary appointments to replace the former member and fills all of their vacancies for which that member may be eligible. So basically they want to make sure that states don't try to game the term limits by

appointing someone to the council after a very short break in service. This will generally require that a person is off the council for a year or more before they're reappointed. But it will depend on the number of vacancies that exist at the time that the member terms off and other factors related to appointments. They can go back to that technical assistance circular if you have questions. And I will move on to slide 16. So this gets back to the point I raised a couple of times now, that knowing the appointing authority in your state is important. If you're new working with the SILC, you probably want to try to set up an appointment with the appointment staff for the Governor or other appointing authority as soon as possible. Only the appointing authority can make appointments, but they have discretion. So they don't have to appoint any particular person. Best practice is for the council to make recommendations for appointment, and when you make

those recommendations to make it clear why that candidate should be appointed because in most circumstances you should treat the appointing authority as someone you need to convince that this person is not only qualified for appointment but also that they're the best candidate for appointment. And in many cases you're going to be having several people -- several vacancies to fill at the same time, so you probably will be recommending several candidates to the appointing authority. The SILC must advocate to ensure that members are appointed to meet the qualifications requirements. I think that it's also very good for SILCs to go beyond what the law actually requires for qualifications and try to treat this almost as if you were hiring someone. Can you rely on that person to show up for meetings, not just to show up for meetings, but to participate in meetings and to read information that councilmembers share in between meetings or that stair shares with councilmembers in between

meetings so that when you have the discussion at the council meeting they're reasonably informed about the topic. And so we do that by actually having an interview of applicants. Once we know that someone applies for the council to have an opportunity to make sure that they understand what kind of time commitment we're talking about, give them an opportunity to ask questions. So, again, going above and beyond the qualifications in the law as to whether this person might be a councilmember who will actually move the project of the SILC forward. In technical assistance circular 13-01, RSA wrote that the act and its implementing regulations do not preclude the SILC from using its federal funds to engage in forms of advocacy that flow directly from the SILC's fulfillment of its statutory duties. And so I think it's pretty easy extension from that guidance that the SILC has to work with the appointing authority around appointments and ensuring that applicants are

qualified before they're appointed is certainly in the best interests of the SILC and the SILC is certainly in a better position to do that in most cases than your appointing authority will be. So set up meetings with the staff who process appointments. If the staff changes or when the appointing authority changes, you're probably going to want to set up meetings at that time as well. Find out what kind of application process they require, how you can interact with that, can they send you names and contact information for applicants when they receive them in case it's not someone that you're familiar with. You also want to ask what other rules around appointments your appointing authority is going to follow, and there will be a great difference in those rules not only from state to state but even in the same state when you have a different administration in power, the practices they follow are going to be different.

 So I'm going to move ahead to slide 17. Does the appointing authority have procedures to solicit recommendations from representatives of organizations? That's certainly one of the questions to include in that kind of conversation. If not, the SILC should develop and follow those procedures. Whom in organizations do you work with? Review the language in your SPIL arnd outreach and Coordination of Services. So if the outreach plan in your State Plan for Independent Living identifies certain types of minorities or disability groups as underserved, if your plan for the network of centers identifies parts of the state that are not well served by existing centers, or in other parts of the plan where it talks about how the IL program is going to coordinate with other programs serving people with disabilities in this state, if you've identified organizations through there, those are among the organizations you would want to interact with when you have vacancies that you want to

fill. Almost certainly almost all the time that's going to involve the centers. Having a good relationship with your centers and asking for their help when you have vacancies to serve is certainly a best practice. In fact, since council members are supposed to be individuals who are knowledgeable about Independent Living Services and Centers for Independent Living, someone who is either a current or past board member of a center is probably going to be your ideal candidate for the council. And remember, the consumer majority requirement talks about employees of Centers for Independent Living not counting towards the consumer majority requirement, but it doesn't talk about board members from Centers for Independent Living. So definitely want to reach out to them. Centers also often have newsletters and/or web pages or social media presence where they can help you recruit. They also are generally going to be knowledgeable with other organizations in their service areas that

provide services to people with disabilities or at least knowledgeable about people with disabilities.

 And so the bottom line is to just ensure that you consummit with a broad range of organizations as you're recruiting candidates.

 I'm going to move ahead to slide 18. So this is something that you may know as of -- has proposed standards and indicators for statewide Independent Living councils. The 2014 amendments to the act required the administration to do that, and hopefully at some point in the near future those standards and indicators will be finalized. But Proposed Indicator 1.1 specifically says that the SILC will develop a method for recruiting applicants and receiving applications consistent with the Independent Living philosophy and the requirements of the law. How that works in your state is going to depend on how the appointing authority goes about their part of the process. So, again, that's a topic that you need to bring to the table when you have your meeting with staff for the appointing authority. How can you do this? What part of it will the appointing authority do? What part of it will the SILC do? But to make sure that everything that needs to be done will get done.

 The Proposed Indicator 1.3 indicated that at least annually the SILC Wilford a list of qualified, knowledgeable and diverse candidates for appointment to the SILC to the appropriate appointing authority for consideration. And so in most states the terms of office for councilmembers expire at the same time for several members. You want to make sure that you have applicants and have had a chance to review applicants prior to the expiration of those terms. That's the best practice. Any time you have a vacancy you'll also want to be recruiting candidates, making recommendations and submitting them to the appointing authority. And because of that, one of the things you'll probably find out is that you always need to be recruiting candidates because you never know when you're going to have a vacancy and you don't want to be in the position where you have a vacancy and you don't have someone to fill that so you have to go through recruitment before you can do any kind of screening

for qualifications, then do the screening, and then submit it to the appointing authority and they will do their process which oftentimes includes their own review of the candidates. For instance, in Wisconsin we know that they do a criminal background check before they appoint people. We know that they also do a more thorough investigation than this -- than just that. We're not always clear exactly what's involved with their investigation, but you should expect that just because you make a recommendation you're not necessarily going to get the appointment right away unless you've developed that kind of relationship with the appointing authority. At any rate, having candidates at the ready will prevent you from having long gaps in service where seats remain vacant for a long period of time.

 When forwarding candidates, the best practice is to explain what you've done around recruitment, including what organizations and how solicited and how the recommended candidates are qualified.

 I'm going to move ahead to slide 19. The SILC should identify potential vacancies will before they occur. SILCs should identify where it is weak with respect to statewide representation and diversity, looking at underserved groups, and the SILC should take affirmative steps to strengthen those weak areas and identify other areas for targeted recruitment. I'm going to move ahead to slide 20.

 So when you're trying to figure out how you're going to get all of this done, what do you -- what does the Governor or other appointing authority ask on their application? Because in most states they are going to have their own application process and you want to know what's on that application. If there are issues that you think you need to know about in order to ensure that people are qualified and that the diversity of your state is represented on the council, you may want to ask additional questions, and some of the things you may want to put on a questionnaire, for instance, is how the applicant will help with diversity, what does the applicant know about Independent Living Services and Independent Living Centers. You may want to consider interviewing applicants. How are they qualified? And not just how do they meet the legal requirements for qualifications for members but just from a common sense, are they going to help the council do its work? Do they have experience

with organizations? Have they been a strong advocate for the needs of people with disabilities? There may be all kinds of things you want to know related to qualifications. You want to know what kind of relationships, and I don't mean personal relationships there, but what kind of relationships with their Center for Independent Living and other disability organizations do they have? What kind of experience do they have? Do they understand what the expectations for councilmembers are and are they able to assure you that they'll be able to help with the council's work?

 I'm going to move to slide 21. And from time to time you're still going to have issues maintaining the composition of your SILC, and I will fess that sometimes we've sometimes had those gaps between someone leaving the council and people being appointed to fill more than one vacancy. When that happens you need to be honest with what you're actually doing at your council with respect to recruitment, screening and recommendation and appointments and making adjustments as appropriate. The solutions of course, are going to depend on where the problems exist. Some of the things to look at are whether both staff and councilmembers are engaged in recruitment screening and recommendation and frankly how do you include the centers for independent loving in your state in recruitment, screening and recommendation for councilmembers? Remember the centers and the designated state entity are partners in making the IL programs work. If you need it, ask for their help. As I've

mentioned eferl times, the centers can do all kinds of things to help, but so can your designated state entity. And know your IL liaison because there are some things they can do to help you if you're having trouble recruiting. So, for instance, we have had a number of open seats in the last year, and we were having trouble getting appointments through our Governor, and working with ILA they wrote a letter that raised the seriousness of making appointments to our designated state entity, and then we were able to make sure that that message was also conveyed to the Governor's office, and it's helped in getting appointments through.

 I'm going to move to slide 22. So the ILA's Proposed Indicator 1.5 says that the SILC provides each newly appointed member with an orientation, including orientation regarding IL philosophy, prior to participation at meetings and voting. And so, again, this is going to go back to qualifications. There are those minimum legal qualifications of whether someone is knowledgeable about Independent Living Services and Independent Living Centers. There are all kinds of other issues that are qualified because when you're working with a SILC you have to be able to manage your SILC budget. You have to be able to supervise your SILC staff. You need to have a good process for development of a SPIL that meets all the requirements. You have to have process in place to evaluate the SPIL. So there are all of those SILC duties and authorities. There are knowledge pieces related to that that you want to be represented on the SILC, and that requires that you do training.

Some of that you're going to want to do through orientation and information about IL philosophies, IL services and IL centers certainly ought to be part of that orientation before someone has to vote as a member of the council, but you're also going to want to have some kind of ongoing training in order to ensure that council members have the knowledge they need to make the decisions that SILCs need to do. In your training and orientation you want to provide information on SILC duties and authorities. You want to provide information on the standards and indicators, because they're very good information about what the Independent Living Administration expects every SILC to do. You want to consider including Independent Living history, information about IL services and centers. What does your SPIL say about the programs in your state and the SILC functions. You want to make sure that councilmembers have familiarity with the SPIL, especially newer members who weren't involved in

development of whichever SPIL is your current SPIL.

 Another area that every SILC ought to address is ethical rules. So in the act there's language about avoiding conflicts of interest between your staff and the designated state entity. There's the rule about the consumer majority that requires exclusion of state and center employees that from consumer majority, which is arguably a conflict of interest rule. When you look at the federal Uniform Guidance you're going to see an expectation in a federal program that councilmembers who serve as a board and staff avoid conflicts of interest. You may have state laws that require councilmembers to follow certain ethical rules. And you can't expect councilmembers to follow those rules if they're not aware of them. So that should be part of your curricula. You also need to make sure that they know about some of the nuts and bolts of operations. So for most of your councilmembers they're probably going to need expenses reimburse to do participate in your meetings. How does that

work? What kind of forms do you require? So you want to include that in your training and orientation as well.

 Going to move to the next slide 23. We wanted to make sure that you're all aware that there's a national training and technical assistance project for SILCs. This particular presentation is part of that, but there are all kinds of training materials, webinars, video recordings, a directory of SILCs and CILs at ILRU.org or SILCnet.org. And I want to underline that directory of SILCs and CILs. One of the things you will find out is that staff of SILCs in other states can be one of your best resources when you have issues. Not mentioned on this page, but there has been an annual training activity called SILC Congress in January for -- I believe it's over 20 years now. Also a good resource for SILCs for training in how to do your job as well as networking, how to meet your peers in other states. There's a SILCspeak peer technical assistance telephone call the first Thursday of every month for SILC staff and members. And we have an email for Sharon Finney for

anyone interested in participating. There are also BLOGs with answers to commonly asked questions at IL NET-TA.org and there's a SILC connection Facebook page. Facebook.com/SILCconnection.

 And go to the next one. Lost track of the numbers here. There's peer mentoring, individualized SILC-to-SILC sharing sponsored by SILC-NET. And if you are interested in that, contact Mary Olson at APRIL. Her email is in the slideshow. There are intensive support and assistance with compliance questions that Paula McElwee at ILRU can help you with, and again her email is a link in the slideshow here. There's also information about upcoming webinars and on-location trainings. Contact Tim Fuchs at NCIL. And his address, his email address, is also in the slide.

 I'm going to move to the next page. If you have questions, when I have time available, I'm happy to provide technical assistance to people from around the country. I'm at the Independent Living Council of Wisconsin. My email address is mikeb@ilck.org and our phone number is 608-256-9257.

 I'll move to slide 26. And I think, Tim, you cover this one?

 >> TIM FUCHS: Sure. I will introduce the evaluation. Thanks for walking through the resources, Mike. I appreciate that. I just want to, before we close, I just want to confirm, there's really no wrong person to reach out to. All of us, all of those folks listed there at ILRU, at APRIL, here at NCIL, we all have roles for not just organizing trainings but also technical assistance for SILCs. Give us a buzz, write us an email and we'll point you in the right direction to get some help.

 Like Mike said here on slide 26 therein ea evaluation form. Please take a minute to let us know of what you thought of the on-demand presentation, what you liked, what we could do better and don't forget about that live Q&A call on the 28th. We've had on-demand presentations this month as part of this series on SILC authorities, on the SILC Resource Plan in the SPIL, on the SPIL planning cycle itself. Of course, today's presentation on SILC composition. And also on coordination of SILC activities in cooperation -- and cooperation with the CILs and other state agencies. So take a look at those. Sign up for the live Q&A call on the 28th and let us know what else we can help you with. Okay. With that, we are done for today's on-demand presentation. Mike, a really great job with this. I really appreciate you taking the time to do this for us, to put together the slideshow and to present this for the SILCs. Nice job. And everyone, have a wonderful afternoon. Thanks,

bye-bye.

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