

State: CO

# **STATE PLAN FOR INDEPENDENT LIVING (SPIL)**

## **Chapter 1, Title VII of the Rehabilitation Act of 1973, as Amended**

**STATE INDEPENDENT LIVING SERVICES (SILS) PROGRAM  
PART B**

**CENTERS FOR INDEPENDENT LIVING (CIL) PROGRAM  
PART C**

**FISCAL YEARS 2017-2019**

Effective Date: October 1, 2016

OMB NUMBER: 1820-0527

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## **PART I: Assurances**

State of: Colorado

### **Section 1: Legal Basis and Certifications**

- 1.1 The designated State unit (DSU) eligible to submit the State Plan for Independent Living (SPIL or the plan) and authorized under State law to perform the functions of the State under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs is Colorado Department of Labor and Employment/Division of Vocational Rehabilitation/Office of Independent Living (insert name of DSU). *34 CFR 76.104(a)(1) and (2); 34 CFR 364.22(a)*
- 1.2 The separate State agency eligible to submit the plan and authorized under State law to provide vocational rehabilitation (VR) services to individuals who are blind is N/A (insert name of separate State agency). Indicate N/A if not applicable. *34 CFR 76.104(a)(1) and (2); 34 CFR 364.20(d) and 364.22(c)*
- 1.3 The Statewide Independent Living Council (SILC) that meets the requirements of section 705 of the Act and is authorized to perform the functions outlined in section 705(c) of the Act in the State is Colorado Statewide Independent Living Council (insert name of SILC). *34 CFR 364.21(a)*
- 1.4 The DSU and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, and the SILC are authorized to jointly develop, sign and submit this SPIL on behalf of the State, and have adopted or otherwise formally approved the State Plan for Independent Living. *34 CFR 76.104(a)(7); 34 CFR 364.20(c) and (d)*
- 1.5 The DSU, and, if applicable, the separate State agency authorized to provide VR services to individuals who are blind, may legally carry out each provision of the plan and will comply with all applicable Federal statutes and regulations in effect with respect to the three-year period it receives funding under the SPIL. *34 CFR 76.104; 34 CFR 80.11(c)*
- 1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law. *34 CFR 76.104(a)(4) and (8)*
- 1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is Steve Anton, Director Division of Vocational Rehabilitation (Name, title of DSU director) and N/A (Name, title of separate State agency director, if applicable). *34 CFR 76.104(a)(5) and (6)*

## **Section 2: SPIL Development**

- 2.1 The plan shall be reviewed and revised not less than once every three years, to ensure the existence of appropriate planning, financial support and coordination, and other assistance to appropriately address, on a statewide and comprehensive basis, the needs in the State for:
- The provision of State independent living services;
  - The development and support of a statewide network of centers for independent living; and
  - Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities. *34 CFR 364.20(f)*
- 2.2 The DSE and SILC conduct public meetings to provide all segments of the public, including interested groups, organizations and individuals, an opportunity to comment on the State plan prior to its submission to the Commissioner and on any revisions to the approved State plan. *34 CFR 364.20(g)(1)*
- 2.3 The DSE and SILC establish and maintain a written description of procedures for conducting public meetings in accordance with the following requirements. The DSU and SILC shall provide:
- appropriate and sufficient notice of the public meetings (that is, at least 30 days prior to the public meeting through various media available to the general public, such as newspapers and public service announcements, and through specific contacts with appropriate constituency groups and organizations identified by the DSU and SILC);
  - reasonable accommodation to individuals with disabilities who rely on alternative modes of communication in the conduct of the public meetings, including providing sign language interpreters and audio-loops; and
  - public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication. *34 CFR 364.20(g)(2)*
- 2.4 At the public meetings to develop the State plan, the DSE and SILC identify those provisions in the SPIL that are State-imposed requirements beyond what would be required to comply with the regulations in 34 CFR parts 364, 365, 366, and 367. *34 CFR 364.20(h)*
- 2.5 The DSE will seek to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under a project funded under chapter 2 of title VII of the Act and that the DSU determines to be effective. *34 CFR 364.28*
- 2.6 The DSE and SILC actively consult, as appropriate, in the development of the State plan with the director of the Client Assistance Program (CAP) authorized under section 112 of the Act. *34 CFR 364.20(e)*

### **Section 3: Independent Living Services**

- 3.1 The State, directly or through grants or contracts, will provide IL services with Federal, State, or other funds. *34 CFR 364.43(b)*
- 3.2 Independent living services shall be provided to individuals with significant disabilities in accordance with an independent living plan mutually agreed upon by an appropriate staff member of the service provider and the individual, unless the individual signs a waiver stating that such a plan is unnecessary. *34 CFR 364.43(c)*
- 3.3 All service providers will use formats that are accessible to notify individuals seeking or receiving IL services under chapter 1 of title VII about:
- the availability of the CAP authorized by section 112 of the Act;
  - the purposes of the services provided under the CAP; and
  - how to contact the CAP. *34 CFR 364.30*
- 3.4 Participating service providers meet all applicable State licensure or certification requirements. *34 CFR 365.31(c)*

### **Section 4: Eligibility**

- 4.1 Any individual with a significant disability, as defined in 34 CFR 364.4(b), is eligible for IL services under the SILS and CIL programs authorized under chapter 1 of title VII of the Act. Any individual may seek information about IL services under these programs and request referral to other services and programs for individuals with significant disabilities, as appropriate. The determination of an individual's eligibility for IL services under the SILS and CIL programs meets the requirements of 34 CFR 364.51. *34 CFR 364.40(a), (b) and (c)*
- 4.2 Service providers apply eligibility requirements without regard to age, color, creed, gender, national origin, race, religion or type of significant disability of the individual applying for IL services. *34 CFR 364.41(a)*
- 4.3 Service providers do not impose any State or local residence requirement that excludes any individual who is present in the State and who is otherwise eligible for IL services from receiving IL services. *34 CFR 364.41(b)*

### **Section 5: Staffing Requirements**

- 5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. *34 CFR 364.23(a)*
- 5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:
- with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices,

Braille or audio tapes, and who apply for or receive IL services under title VII of the Act; and

- in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act. *34 CFR 364.23(b)*

5.3 Service providers establish and maintain a program of staff development for all classes of positions involved in providing IL services and, if appropriate, in administering the CIL program. The staff development programs emphasize improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy. *34 CFR 364.24*

5.4 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will take affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act. *34 CFR 364.31*

#### **Section 6: Fiscal Control and Fund Accounting**

6.1 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will comply with applicable EDGAR fiscal and accounting requirements and will adopt those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for those funds. *34 CFR 364.34*

#### **Section 7: Recordkeeping, Access and Reporting**

7.1 In addition to complying with applicable EDGAR recordkeeping requirements, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will maintain records that fully disclose and document:

- the amount and disposition by the recipient of that financial assistance;
- The total cost of the project or undertaking in connection with which the financial assistance is given or used;
- the amount of that portion of the cost of the project or undertaking supplied by other sources;
- compliance with the requirements of chapter 1 of title VII of the Act and Part 364 of the regulations; and
- other information that the Commissioner determines to be appropriate to facilitate an effective audit. *34 CFR 364.35(a) and (b)*

7.2 With respect to the records that are required by *34 CFR 364.35*, all recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will submit reports that the Commissioner determines to be appropriate. *34 CFR 364.36*

7.3 All recipients of financial assistance under parts B and C of chapter 1 of title VII of the Act will provide access to the Commissioner and the Comptroller General, or any of their duly

authorized representatives, to the records listed in 34 CFR 364.37 for the purpose of conducting audits, examinations, and compliance reviews. 34 CFR 364.37

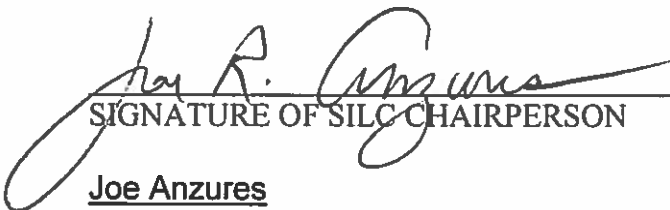
**Section 8: Protection, Use, and Release of Personal Information**


8.1 Each service provider will adopt and implement policies and procedures to safeguard the confidentiality of all personal information, including photographs and lists of names in accordance with the requirements of 34 CFR 364.56(a)(1-6). 34 CFR 364.56(a)

**Section 9: Signatures**

After having carefully reviewed all of the assurances in sections 1 - 8 of this SPIL, the undersigned hereby affirm that the State of Colorado is in compliance and will remain in compliance with the aforementioned assurances during 10/2016 – 09/2019 (specify the three-year period covered by this SPIL).

The effective date of this SPIL is October 1, 2016 (year)

  
\_\_\_\_\_  
SIGNATURE OF SILC CHAIRPERSON 6/3/2016  
DATE  
Joe Anzures  
NAME OF SILC CHAIRPERSON

  
\_\_\_\_\_  
SIGNATURE OF DSU DIRECTOR 6-3-16  
DATE  
Steve Anton, Director of the Division of Vocational Rehabilitation  
NAME AND TITLE OF DSU DIRECTOR

N/A  
SIGNATURE OF DIRECTOR OF THE SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND DATE

N/A  
NAME AND TITLE OF THE DIRECTOR OF THE SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND DATE

**Part II: Narrative**

**Section 1: Goals, Objectives and Activities**

**1.1 Goals and Mission – 34 CFR 364.42(b)(1)**

Describe the overall goals and mission of the State's IL programs and services. The SPIL must address the goals and mission of both the SILS and the CIL programs, including those of the State agency for individuals who are blind as they relate to the parts of the SPIL administered by that agency.

The mission of the Colorado SILC is "Paving the pathways to full participation for the community of people with disabilities served by Colorado's centers for independent living." The Colorado Statewide Independent Living Council (SILC) envisions a Colorado that offers equal and full participation in professional and community life to all people with disabilities.

Colorado's Independent Living Partners (DSE, SILC, and the Statewide Network of Independent Living Centers) commit the next three years to improving the effectiveness of the SILC, increase the knowledge base of SILC members, increasing the capacity of the CILs, and addressing unmet needs within the state.

**1.2 Objectives – 34 CFR 364.42(a)(1) and (d); 34 CFR 364.32; 34 CFR 364.33**

1.2A Specify the objectives to be achieved and the time frame for achieving them.

Goal	Objectives	Time Frames	Cost
<p>Improve SILC effectiveness.</p>	<p>On or before 7/1/2017 have an avenue to gather information from CILs and SILC members to determine the effectiveness of CILs permanent placement in CDLE/DVR/OIL, based on criteria developed during our first year at CDLE. Strategize on next steps to determine if there are advocacy efforts that can be done to improve the relationship or its effectiveness. If not, outline strategy and needed steps to prepare for a departmental move if applicable.</p>	<p>On or before 07/01/17, we will begin discussions regarding another move if applicable.</p>	<p>No cost – Centers would cover the cost of legislation</p>
	<p>Complete assessments (i.e., Snap-Shot, SWOT) to determine SILC needs. Through the mail and at meetings.</p>	<p>By 04/01/17</p>	<p>\$200 to gather information via US mail and for collating</p>



Goal	Objectives	Time Frames	Cost
<p>Improve SILC effectiveness, continued.</p>	<p>Conduct strategic planning to include:</p> <ul style="list-style-type: none"> <li>• Long-range operational goals &amp; objectives</li> <li>• Outcome measures</li> <li>• Evaluation</li> <li>• Staffing</li> <li>• Responsibilities</li> <li>• Increasing membership</li> <li>• Technology (video conferencing)</li> <li>• Website and other digital accessibility</li> </ul>	<p>At SILC Retreat 06/2017</p>	<p>We feel we might need \$500 for materials &amp; \$6,000 for a Facilitator &amp; facility for a 2 day event, But we have only \$5,000 budgeted unless we can find other resources.</p>
	<p>Develop an overall resource plan/fundraising plan in line with state regulations and WIOA, to address:</p> <ul style="list-style-type: none"> <li>• Structural options like incorporation as a 501(c)3</li> <li>• Whether there is a possibility of contracting with DVR as a non-for-profit</li> <li>• Joining the Colorado Alliance for Independent Living (CAIL) to collaborate on projects</li> <li>• Unrestricted funds for food at meetings</li> <li>• Fundraising</li> </ul>	<p>We will assign a committee to determine the technicalities and pros &amp; cons, look at models in other states. By 10/01/17 at a regular meeting we will decide to pursue or abandon non-profit incorporation.</p>	<p>No additional cost for decision. May need \$700 for incorporation during year 2.</p>
	<p>The SILC will develop immediate plans for:</p> <ul style="list-style-type: none"> <li>• Up to 6 meetings per year, in rotation around the state</li> <li>• A local meet &amp; greet the evening before each SILC meeting</li> <li>• Meetings focused on action as well as reports</li> <li>• Including Centers in SILC meetings</li> </ul>	<p>By 10/31/2016</p>	<p>\$40,000/year for the meetings &amp; the retreat, based on prior expenses and adding a little for inflation.</p>
	<p>The SILC will develop a master calendar that includes:</p> <ul style="list-style-type: none"> <li>• Goals on this SPIL</li> <li>• Tracking current SPIL goals</li> </ul>	<p>Tracking System by 12/01/16</p>	<p>No cost for calendar</p>

Goal	Objectives	Time Frames	Cost
Improve SILC effectiveness, continued.	<ul style="list-style-type: none"> <li>• Timeline for the next SPIL</li> <li>• New Survey</li> <li>• Retreats</li> <li>• Membership terms</li> <li>• Trainings</li> <li>• Committee meetings</li> <li>• Events</li> </ul>	<p>Timeline by 02/01/17</p> <p>Survey by 10/18</p>	\$3,000 for survey
Increase SILC member knowledge base	Complete training needs-assessment, through the mail and at meetings.	By 04/01/17	No cost
	<p>Develop an annual training plan that includes content &amp; materials. We will address:</p> <ul style="list-style-type: none"> <li>• Boards &amp; Commissions Training</li> <li>• Initial orientation and onboarding (3 months)</li> <li>• Responsibilities</li> <li>• Acronyms</li> <li>• Visiting the IL Centers</li> <li>• Regular State &amp; WIOA regulation training</li> <li>• Staffing</li> <li>• Using ILRU &amp; APRIL</li> <li>• Smooth as SILC</li> <li>• Operations Manual</li> <li>• Involving CIL staff &amp; directors</li> <li>• Regular in-person training</li> <li>• User training on technology</li> <li>• Training needs of the overall IL community</li> <li>• Annual training of the SILC by the IL Cross-Training Group</li> </ul>	<p>Training Committee</p> <p>Plan by 08/01/17</p> <p>Implement by 10/01/17</p>	We feel that \$15,000 is needed over three years for training, but we can budget only \$3,500 for year 1, \$2,500 for year 2, and \$3,500 for year 3 unless we can come up with other resources.

Goal	Objectives	Time Frames	Cost
<p>Increase the capacity of the CILs.</p>	<p>The SILC will hold an annual IL conference event in Denver, providing travel assistance to people with disabilities from around the state. Costs will be kept down by using ILRU and local resources, including collaboration with the CILs, CCDC and other state disability organizations.</p>	<p>Using the Training or another SILC committee, possibly collaborating with other organizations, hold a conference in year 3, and decide how often we can hold future conferences.</p>	<p>\$6,000 for a conference &amp; Scholarships would be best, but our budget is for \$4,000 without other resources. CILs will pay to send their own staff. This goal will also be contingent on partnering with CILs and other organizations.</p>
	<p>The SILC will develop a portable fully accessible Disability Rights Movement/IL History exhibit to have on display, and for the Centers to borrow for events. Atlantis may be a resource for this.</p>	<p>10/01/2018</p>	<p>We would like to spend \$10-15,000, but have only \$5,000 budgeted. This is important and we want to work toward it if we can find the resources.</p>
	<p>The SILC Public Policy Committee will collect &amp; develop fact sheets, educational issue briefs and resource instructions for Centers to use when issues arise. Collect from The IC, CCDC, The Arc, etc.</p>	<p>Ongoing throughout SPIL cycle</p>	<p>We would like \$10,000 over 3 years for the SILC to produce these, but we have only \$4,050 budgeted.</p>

1.2B Describe the steps planned regarding outreach to populations in the State that are unserved or underserved by programs under title VII, including minority groups and urban and rural populations. This section of the SPIL must:

- Identify the populations to be designated for targeted outreach efforts;
  - Identify the geographic areas (i.e., communities) in which the targeted populations reside; and
  - Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed.
- \*\* Please note that this section addresses the needs found in our survey. \*\*

<b>Population &amp; Geographic Area</b>	<b>Addressing Needs</b>	<b>Cost</b>
Deaf/HOH Statewide	<p><b>Goal:</b> Increase the number of Deaf/HOH consumers being served per CIL, by compiling and implementing best practices to promote culturally &amp; linguistically language competent services</p> <p>Within the SPIL period we will:</p> <ol style="list-style-type: none"> <li>1. Revisit information that was assembled through a \$10,000.00 grant from the Colorado Commission for Deaf/HOH in 2011.</li> <li>2. Participants from current established group of Center staff will determine what information is current (such as the # of individuals from the last Census in 2010 per CIL area).</li> <li>3. Group will utilize existing research and gather additional information needed to identify and compile best practices that will decrease needs/barriers/obstacles in their community.</li> <li>4. Disseminate results of research and best practices to all Centers and/or place on SILC website.</li> </ol> <p><b>Outcome:</b> People who are Deaf or HOH have access to communication so they can receive services from the Centers</p>	<p>As it will cost \$1,000/meeting for Interpreters, we feel \$4,000/year is appropriate, but we have funds for only \$4,000 in year 1, \$3,250 in year 2, and \$3,500 in year 3 – unless we find other resources. This goal will also be contingent on partnering with the CILs. The goal is important to us and we want to work toward it if we can find the resources.</p>

Population & Geographic Area	Addressing Needs	Cost
Youth  Statewide	<p><b>Goal:</b> To increase services for the youth to promote self-advocacy, leadership and successful transition to work.</p> <p>Within the SPIL period we will:</p> <ol style="list-style-type: none"> <li>1) SILC Youth Committee will research nationwide best practices for youth transition &amp; youth IL services &amp; summarize their findings in a white paper. If needed, a statewide plan to improve youth programs and services will be developed.</li> <li>2) Committee will develop Youth Advisory Council (YAC), by getting representation from each region, defining the structure of the YAC, and assigning three youth to serve as ex officio members of the SILC and attend statewide and national meetings and conferences representing Colorado youth with significant disabilities.</li> <li>3) Conduct a statewide IL Youth Leadership Forum beginning in FY-18 and, if successful, continue it annually thereafter.</li> </ol> <p><b>Outcome:</b> Youth with disabilities have increased capacity to advocate on their own behalf and become our future leaders.</p>	<p>We would like to spend \$10,000 for 1 in-person meeting, 3 youth to attend 2 SILC meetings, ½ cost (50-50 w/ CILs) of 3 youth to attend 1 state &amp; 1 national conference , plus \$10,000 for a 2 day forum, travel for 20-40 youth to Denver (split with CILs), &amp; meeting space. We have only \$14,250 budgeted, so it is important to find more funding.</p>
Rural  As defined by state demographer for SGF funding formula	<p><b>Goal:</b> Provide more comprehensive services to people with disabilities in rural Colorado.</p> <p>Within the SPIL period we will:</p> <ol style="list-style-type: none"> <li>1. Establish a regular meeting comprised of CIL staff that serve the rural areas of each CIL catchment area to brainstorm ideas that will increase services in those areas.</li> <li>2. Look specifically at systems advocacy and barrier removal.</li> <li>3. Assemble a best practices document based on research findings.</li> </ol> <p><b>Outcome:</b> People with disabilities living in rural areas have equal access to services as those living in urban or suburban areas.</p>	<p>Conference calls only – no additional expense</p>

<b>Population &amp; Geographic Area</b>	<b>Addressing Needs</b>	<b>Cost</b>
<p>Nursing Homes</p> <p>Statewide</p>	<p><b>Goal:</b> To increase options for alternatives to living in a nursing home.</p> <p>Within the SPIL period we will:</p> <ol style="list-style-type: none"> <li>1. Advocate for increased affordable integrated accessible housing for people who want to live in the community.</li> <li>2. Advocate for Universal Design and Visitability in all construction</li> <li>3. Research the # of people in local SNFs that meet eligibility requirements and identify barriers to determine specific advocacy needs in that region. Each area/CIL will advocate locally per the identified local issues and as a collective group for statewide issues</li> <li>4. Support people who have goals to maintain family integrity</li> <li>5. The Public Policy Committee, a new White Paper Committee, or an ad hoc Transition Committee will write an issue brief, using information from the Regional Transition Committees, which identifies the statewide issues and has a call to action.</li> <li>6. Compare the statewide successful transition numbers at the beginning and end of this SPIL cycle.</li> </ol> <p><b>Outcome:</b> People with disabilities live in the community</p>	<p>\$50/month for video conference calls (\$600/year)</p>
<p>Native &amp; Minority, ESL, Mental Illness</p> <p>Statewide</p>	<p><b>Goal:</b> Gather research data on Native &amp; Minority, ESL and Psychiatric Illness to assist with goal planning process for upcoming SPIL</p> <ol style="list-style-type: none"> <li>1. SPIL Committee will do as a function of gathering needs assessment information.</li> <li>2. SPIL Committee to include these steps as a part of preparing for the 2019-2021 SPIL</li> </ol> <p><b>Outcome:</b> The next SPIL cycle has goals in these areas</p>	<p>Conference calls only – no additional expense</p>

1.3 Financial Plan – 34 CFR 364.42(a)(2) and (3); 34 CFR 364.29

Describe in sections 1.3A and 1.3B, below, the financial plan for the use of Federal and non-Federal funds to meet the SPIL objectives.

### 1.3A Financial Plan Tables

Complete the financial plan tables covering years 1, 2 and 3 of this SPIL. For each funding source, provide estimated dollar amounts anticipated for the applicable uses. The financial plan table should include only those funding sources and amounts that are intended to support one or more of the objectives identified in section 1.2 of the SPIL. To the extent possible, the tables and narratives must reflect the applicable financial information from centers for independent living. Refer to the SPIL Instructions for additional information about completing the financial tables and narratives.

– Insert additional rows for the specific funding sources and amounts expected within the categories of Other Federal Funds and Non-Federal Funds.

#### Year 1 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B	40,750.00	0	249,332.50	0
Title VII Funds - Chapter 1, Part C	0	0	1,042,727.00	0
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)	0	0	0	0
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	48,000.00	0	0	0
Other Federal Funds - Other	0	0	0	0
Non-Federal Funds -State Funds	0	0	6,831,645.00	0
Non-Federal Funds - Other	0	0	0	0

#### Year 2 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B	40,750.00	0	249,332.50	0
Title VII Funds - Chapter 1, Part C	0	0	1,042,727.00	0
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)	0	0	0	0
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	48,000.00	0	0	0
Other Federal Funds - Other	0	0	0	0
Non-Federal Funds -State Funds	0	0	6,831,645.00	0
Non-Federal Funds - Other	0	0	0	0

#### Year 3 - Approximate Funding Amounts and Uses

Sources	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
Title VII Funds - Chapter 1, Part B	40,750.00	0	249,332.50	0
Title VII Funds - Chapter 1, Part C	0	0	1,042,727.00	0
Title VII Funds - Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)	0	0	0	0
Other Federal Funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	48,000.00	0	0	0
Other Federal Funds - Other	0	0	0	0
Non-Federal Funds -State Funds	0	0	6,831,645.00	0
Non-Federal Funds - Other	0	0	0	0

### 1.3B Financial Plan Narratives

Part B and Innovation and Expansion Funds will be used to fund the resource plan for the SILC. The SILC's annual budget will define how the SILC Resource Plan will be utilized to meet the SPIL goals, SILC goals, and SILC Staff support.

Center operations will be funded through Chapter 1, Parts B and C funds, in addition to State General Funds.

These funds are allocated to Certified Colorado centers for independent living, consisting of five Part C centers and four state funded centers. State General Funds provide a base of \$600,000 for each Center, and any additional SGF are allocated based on an agreed on formula. Part B funds have been allocated based on a five-tier system developed to offset the disparities in Part C and local funding, but we may re-look at that given our new State General Funds award. This allocation process is described in the CO IL Program's Procedures Manual; State IL Rules provide guidance on determining the allocation committee and developing the formula. In order to receive SILS funding, all centers must be currently certified in compliance with Title VII, Section 725 of the Federal Act, as defined in 34 CFR 366.60.

1.3B(1) Specify how the part B, part C and chapter 2 (Older Blind) funds, if applicable, will further the SPIL objectives.

The Part B funds will be combined with the Sec 101 Innovation and Expansion funds to be able to support the SILC Resource plan and the annual SILC budget.

1.3B(2) Describe efforts to coordinate Federal and State funding for centers and IL services, including the amounts, sources and purposes of the funding to be coordinated.

State General Funds (SGF) make up the majority of funding for the Centers for Independent Living (CILs) in Colorado. The State Legislature has appropriated \$6,831,945.00 for IL services. Each CIL receives a base funding amount no less than \$600,000 per center. The base funding is derived from an equal division of the base funds of \$6,001,945.00. Each CIL then receives an allocation from the \$830,000



appropriation for additional factors attributed to a funding formula which is found in State rules, 9.207.3.

There are currently five CILs that receive Part C funds. There is an additional Part C grant for metro Denver which will be going to competitive bid process in the next year.

Part B funds are allocated based on a five-tier system developed to offset the disparities in Part C and local funding. The Federal Part B Funds are distributed to the DSE for the 5% Administrative allowance, \$40,750.00 to the SILC Resource plan. The remainder is distributed to the CILs on a Tier system:

- Tier 1: 3.89% of available Part B funds
  - Atlantis
- Tier 2: 6.39% of available Part B funds
  - Center for Independence
  - Center for People with Disabilities
- Tier 3: 10.39% of available Part B funds
  - The Independence Center
- Tier 4: 13.39% of available Part B funds
  - Center for Disabilities
  - Connections for Independence
- Tier 5: 15.39% of available Part B funds
  - Disabled Resource Services
  - Northwest Colorado Center for Independence
  - Southwest Center for Independence

1.3B(3) Describe any in-kind resources including plant, equipment or services to be provided in support of the SILC resource plan, IL services, general CIL operations and/or other SPIL objectives.

The Colorado SILC owns a teleconference phone, a video teleconference device, laptop, a projector for meetings, and a banner.

1.3B(4) Provide any additional information about the financial plan, as appropriate.

We must reach consensus about how we will organize the SILC (i.e., incorporating as a 501(c)3 ) as soon as is possible so that we can work on getting money for a full time Coordinator. We have concerns about the seeming "Catch 22" of DVR funding restrictions. The SILC Allocations Committee had concerns about having deliverables before asking the CILs for any more money, and about ensuring that we keep the lines clear to ensure that neither DVR or the CILS are running the SILC.

1.4 Compatibility with Chapter 1 of Title VII and the CIL Work Plans – 34 CFR 364.42(c) and (e)

1.4A Describe how the SPIL objectives are consistent with and further the purpose of chapter 1 of title VII of the Act as stated in section 701 of the Act and 34 CFR 364.2.

The objectives of this SPIL include developing a foundation of service provision for the next three years based on assessing IL service needs and the development of an outreach plan tailored to meet the needs of un- and underserved populations around the State. Information from consumers and other key stakeholders will be collected through different mechanisms that take into account accessibility preferences and the rural and frontier natures of significant portions of the State. The viability of the IL network will be supported through fundraising opportunities on a statewide-basis supporting the provision of the five core services. Relationship-building between youth and the ILCs will foster the development of youth leaders in the state. The objectives included in Colorado's SPIL were developed with the input of Center directors, consumers, and other IL stakeholders—accomplishing them will require collaborative relationships amongst all of the parties listed in 34 CFR 364.2.

### **Advocacy Objectives:**

#### Deinstitutionalization -

- Maximizing integration and full inclusion of individuals with significant disabilities into mainstream society and the community of choice.

#### Americans with Disabilities Act -

- Promoting self-help and self-determination of individuals with disabilities through greater knowledge and understanding of rights for equal access and working together to achieve individual and systems advocacy for full inclusion.

### **Networking & Collaboration Objectives:**

#### Statewide Conference on Disabilities –

- Improving working relationships between the SILC, CILs, and numerous other entities by collaborating to explore the possibility of holding a state-wide conference on disability issues through which IL philosophy can be promoted and peer support can be engendered.
- The SILC will work with DVR and the No Wrong Door (NWD) project as appropriate in order to ensure that CILs aren't left out of the NWD process.

### **Education/Outreach Objectives:**

#### Youth -

- Recruiting and training youth through a peer mentorship model to develop knowledge, experience and self-advocacy skills.
- Creating sustained belief in and practice of the IL philosophy including peer mentoring, self-empowerment and independence.

#### Legislators -

- Continue to increase correspondence and collaboration with legislators, particularly Joint Budget Committee members, and state officials to raise awareness and appreciation for IL in Colorado. Educate legislators and state officials about the community-impact benefits and cost savings of IL services in an effort to solidify understanding and support for what we do and how we do it.

### IL Funding Objectives -

- Expand IL resources and funding opportunities through shared best practices, tools and techniques.
- Support the statewide network of CILs through sharing the expenses on collaborative efforts.

### IL Support Objectives -

- Increase knowledge about disability, Independent Living, the philosophy of self-direction, and the value of and benefit to people with disabilities, their families and friends, and society in general that the highest level of independence possible brings
- Promote the philosophy of Independent Living
- Facilitate access to technical assistance opportunities (e.g. ILRU, APRIL, NCIL) to improve and expand implementation of IL philosophy in CILs, grass roots IL groups, partner and other agencies, and in the personal lives of people with disabilities.
- Maximize opportunities for individuals with significant disabilities to educate mainstream society as part of a larger effort to maintain the highest level of independence and productivity possible.

### Leadership -

- Enhancing the IL philosophy by working to ensure future leaders learn self-determination, and empowerment skills and can then advocate for equal access and full inclusion of individuals with significant disabilities in society.
- Encourage and mentor grass root IL leaders, utilizing a peer support model.
- Sustaining the IL movement through education and peer mentoring so all the tenets of IL will continue to be practiced by leaders with significant disabilities in various parts of the state

1.4B Describe how, in developing the SPIL objectives, the DSU and the SILC considered and incorporated, where appropriate, the priorities and objectives established by centers for independent living under section 725(c)(4) of the Act.

The DSE gathers, reads and compares the work plans from each center's 704 report. The state compiles the 704 for the Part B Centers and submits it to the Feds. The complete Colorado 704 incorporates the complete 704s from all Part B and Part C Centers. IL Center directors participate and comment at SILC meetings about gaps and issues. The DSE Representative, 6 IL Center staff, and members of the SILC participated in the SPIL Committee.

1.5 Cooperation, Coordination, and Working Relationships Among Various Entities – 34 CFR 364.26 Describe the steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC, and centers; the DSU, other State agencies represented on the SILC and other councils that address the needs of specific disability populations and issues; and other public and private entities determined to be appropriate by the SILC.

- The description must identify the entities with which the DSU and the SILC will cooperate and coordinate.

The Current DSE (DVR within the Colorado Department of Labor and Employment), the SILC, and the network of Colorado CILs have a strong, collaborative working relationship based on open communication and coordinated efforts.

- The IL Program Coordinator (ILPC) participates in conference calls and meetings with the network. A representative of the SILC attends monthly State Rehabilitation Council (SRC) meetings and provides SILC updates to the SRC, and SRC updates to the SILC.
- A CIL Liaison is a voting member of the SILC, and the SILC Chair attends meetings of the association of Centers.
- The IL Program Coordinator provides a DVR update to the SILC's executive committee and to the full SILC at SILC meetings to share information on the agency and to provide a forum for questions, expressions of concerns and sharing of information.
- The CO SILC is a member of the National Council on Independent Living and the Association of Programs for Rural Independent Living.

Other state and community organizations that the SILC either has working relationships with or will be seeking:

- The Colorado Developmental Disabilities Council
- The Colorado Advisory Council for Persons with Disability
- The Rocky Mountain Americans with Disabilities Technical Assistance Center
- Area Agency on Aging and Adult Resources
- The Colorado Commission for the Deaf and Hard of Hearing
- The Colorado Assistive Technology Program
- The Veteran's Administration
- The Client Assistance Program
- DOLA/Division of Housing
- State Medicaid Agency (Health Care Policy and Financing), specifically CTS, the Colorado Community Choice Act, and the Medicaid Buy-In for Working Adults with Disabilities.
- The Colorado ASPIRE grant part of the Social Security Administration's (SSA) PROMISE grant working with youth between the ages of 14 and 18 and their families who are receiving SSA funding.
- State Youth Council
- Colorado Commission for the Deaf and Hard of Hearing
- Rural and frontier social service agencies, mental health providers, and DVR Counselors, Area Agencies on Aging and Aging, No Wrong Door Regional Pilot Sites, other organizations and agencies addressing the needs of consumers with significant disabilities.
- Long Term Care, including the Colorado Living Advisory Group and the Regional Care Collaborative Organization

## 1.6 Coordination of Services – 34 CFR 364.27

Describe how IL services funded under chapter 1 of title VII of the Act will be coordinated with and complement other services to avoid unnecessary duplication with other Federal, State, and local programs, including the OIB program authorized by chapter 2 of title VII of the Act, that provide IL- or VR-related services.

- The planning processes described in Section 1.5 above contribute to the coordination of services as a result of clear communication between the different agencies and organizations who provide support to mutual clientele. Through establishing a clear awareness of who does what and how we can best work together, with a focus on the perspective of the consumer, we are able to effectively leverage the capacity of our efforts through collaboration. The tasks, duties and responsibilities of the SILC Coordinator are specifically designed to facilitate sharing of information in order to support service coordination.
- The Colorado SILC has collected needs assessment data on ethnically diverse minority populations (see section 1.5 above) as well as people with disabilities living in rural and frontier areas. The needs assessment data collected provides information to guide what services would best be provided by CILs in which areas of the state, some areas housing assistance is identified, other areas transportation services for people with disabilities is lacking, etc. The Colorado SILC will conduct future needs assessments that consider what partner agencies and organizations are addressing to avoid duplication of services or unnecessary competition in lieu of effective partnerships.
- The Colorado SILC will continue efforts to foster consistent and effective communication, coordination and collaboration with partner organizations and agencies, this will be manifest in cooperative agreements, memorandums of understanding, inter-agency agreements and the dissemination of topic related issue briefs to spread the word about statewide IL efforts and initiatives. Please see section 1.5 above for a list of partner organizations, as well as advisory board and council participation which affect the IL plan for service provision and coordination as it relates to the SPIL.
- Whenever evidence of duplication of services is identified, CILs will work to coordinate and facilitate information and assistance services to connect people with the partner agency or organization providing such services. This includes working with our Aging and Disability Resource Coalition partners, Regional Collaborative Care Organizations, No Wrong Door sites, and other groups.
- The SILC will work with and support CILs in Colorado to access technical assistance and support from the Association of Programs for Rural Independent Living (APRIL) to address coordination of services in rural areas of the state.

## 1.7 Independent Living Services for Individuals who are Older Blind – 34 CFR 364.28

Describe how the DSU seeks to incorporate into, and describe in, the State plan any new methods or approaches for the provision of IL services to older individuals who are blind that are developed under the Older Individuals who are Blind program and that the DSU determines to be effective.

Services will be coordinated with providers who have Older Individuals who are Blind (OIB) contracts in a manner that leverages capacity through collaboration and coordinates services around the people we serve.

## Section 2: Scope, Extent, and Arrangements of Services

### 2.1 Scope and Extent – 34 CFR 364.42(b)(2)(3); 34 CFR 364.43(b); 34 CFR 364.59(b)

2.1A Check the appropriate boxes in the SPIL Instrument table indicating the types of IL services to be provided to meet the objectives identified in section 1.2 of this SPIL, and whether the services will be provided by the CILs or by the DSU (directly and/or through contract or grant).

Table 2.1A: Independent living services

Table 2.1A: Independent living services	Provided by the DSE (directly)	Provided by the DSE (through contract and/or grant)	Provided by the CILs (Not through DSE contracts/grants)
Core Independent Living Services, as follows:			
- Information and referral	-	✓	✓
- IL skills training	-	✓	✓
- Peer counseling	-	✓	✓
- Individual and systems advocacy	-	✓	✓
- Transitions & Diversion	-	✓	✓
Counseling services, including psychological, psychotherapeutic, and related services	-	-	-
Services related to securing housing or shelter, including services related to community group living, and supportive of the purposes of this Act and of the titles of this Act, and adaptive housing services (including appropriate accommodations to and modifications of any space used to serve, or occupied by, individuals with significant disabilities)	-	✓	✓
Rehabilitation technology	✓	-	-
Mobility training	-	✓	✓
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	-	✓	✓
Personal assistance services, including attendant care and the training of personnel providing such services	-	-	✓

Table 2.1A: Independent living services	Provided by the DSE (directly)	Provided by the DSE (through contract and/or grant)	Provided by the CILs (Not through DSE contracts/grants)
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	-	✓	Some
Consumer information programs on rehabilitation and IL services available under this Act, especially for minorities and other individuals with disabilities who have traditionally been unserved or underserved by programs under this Act	-	✓	✓
Education and training necessary for living in the community and participating in community activities	-	✓	✓
Supported living	-	-	-
Transportation, including referral and assistance for such transportation	-	-	Referral & assistance
Physical rehabilitation	-	-	-
Therapeutic treatment	-	-	-
Provision of needed prostheses and other appliances and devices	-	-	-
Individual and group social and recreational services	-	✓	✓
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	-	✓	✓
Services for children with significant disabilities	-	✓	✓
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities	-	✓	✓
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	-	✓	✓
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	-	✓	✓
Other necessary services not inconsistent with the Act	-	✓	✓

2.1B Describe any service provision priorities, including types of services or populations, established for meeting the SPIL objectives identified in section 1.2.

- Designated State Entity – The SILC and CILs in Colorado will work to facilitate an adequately staffed home in state government that supports IL services statewide, provides for more autonomy through an IL office in state government and represents the interests of IL by providing a voice at the tables at the state level.
- CIL staff effectiveness and knowledge base – The SILC will work with the CILs to facilitate opportunities for CIL staff to cross-train and share best practices around particular positions, activities, tools, resources, techniques, etc.
- Youth – The SILC will work with the CILs to facilitate the sharing of best practices around youth transition services and raise awareness of the availability of this service by conducting outreach to partner organizations who work with youth.
- Resources – The SILC will develop an operations manual for SILC members that includes an orientation and description of duties, tasks and responsibilities

2.1C If the State allows service providers to charge consumers for the cost of services or to consider the ability of individual consumers to pay for the cost of IL services, specify the types of IL services for which costs may be charged and for which a financial need test may be applied, and describe how the State will ensure that:

- Any consideration of financial need is applied uniformly so that all individuals who are eligible for IL services are treated equally; and
- Written policies and consumer documentation required by 34 CFR 364.59(d) will be kept by the service provider.

Indicate N/A if not applicable.

N/A

## 2.2 Arrangements for State-Provided Services – 34 CFR 364.43(d) and (e)

2.2A If the DSU will provide any of the IL services identified in section 2.1A through grants or contractual arrangements with third parties, describe such arrangements.

The DSE does not provide IL services directly, but uses the state contracting system to contract with the network of IL Centers for the provision of the five core IL services and any others identified by consumers. The contracts are the funding vehicles through which State General and Part B funds flow to support the general operations of the Center.

2.2B If the State contracts with or awards a grant to a center for the general operation of the center, describe how the State will ensure that the determination of an individual's eligibility for services from that center shall be delegated to the center.

Recipients of funding must be state-certified and comply with the requirements of Title VII Chapter 1, Part C regulations. Eligibility for IL services is determined by individual CILs per Colorado State Rules.



### Section 3: Design for the Statewide Network of Centers

#### 3.1 Existing Network – 34 CFR 364.25

Provide an overview of the existing network of centers, including non-Part C-funded centers that comply with the standards and assurances in section 725 (b) and (c) of the Act, and the geographic areas and populations currently served by the centers.

All certified Centers in Colorado are a part of the statewide network that serves all 64 counties with Part B and State General Funds. Only 5 are Part C CILs and they cover 36 of the 64 counties. The network provides cross disability services and, depending upon their location within the state, their underserved consumers may include: Deaf and hard of hearing, people of color, youth, people living in nursing homes, seniors with vision loss, rural and frontier counties, people who don't speak English, and/or people with mental illness.

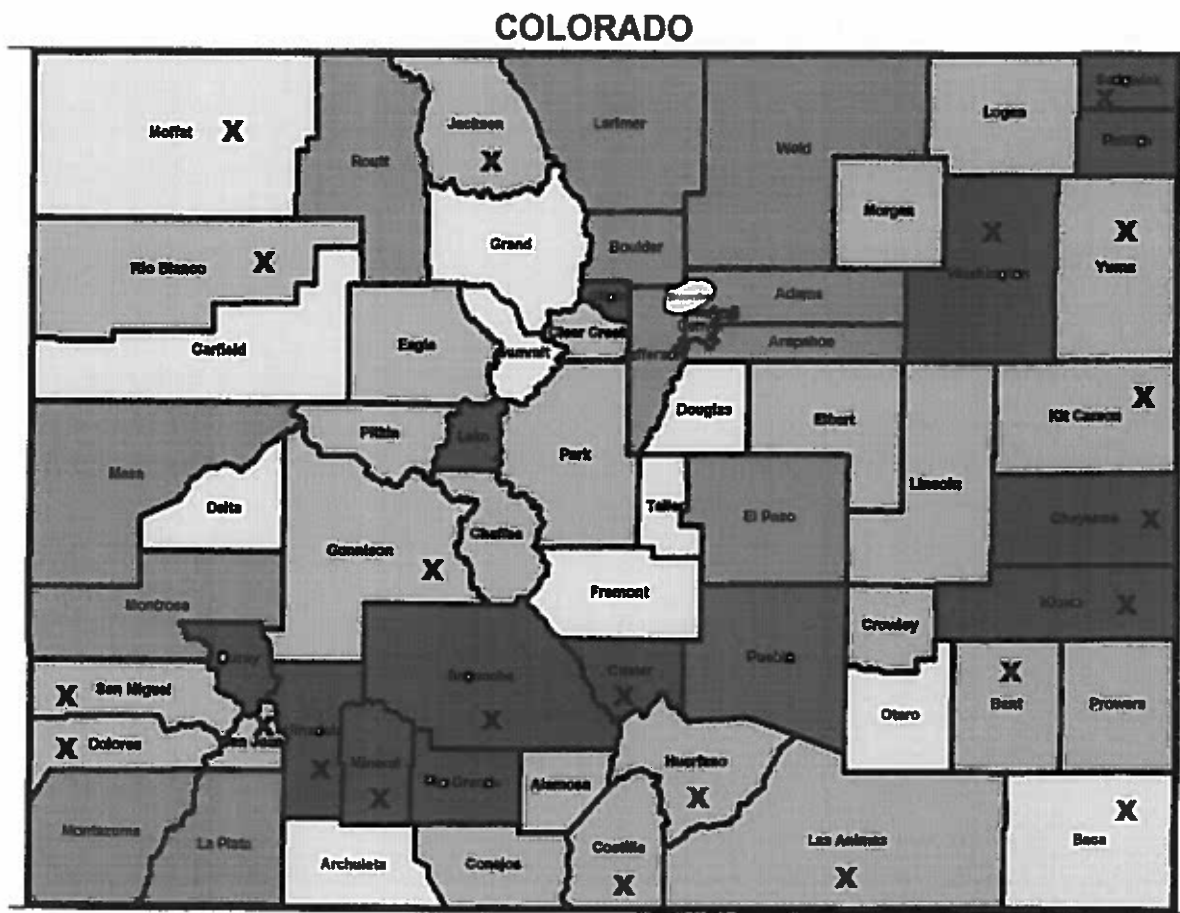
Please see the table below for a description of the network.

CENTER	PART B	Part C
Atlantis Community, Inc., Denver	<ul style="list-style-type: none"> <li>1) Adams (share w/ CPWD)</li> <li>2) Arapahoe</li> <li>3) Denver</li> <li>4) Douglas</li> <li>5) Jefferson (share w/ CPWD)</li> </ul>	<ul style="list-style-type: none"> <li>1) Adams</li> <li>2) Arapahoe</li> <li>3) Denver</li> <li>4) Douglas</li> <li>5) Jefferson</li> <li>6) Elbert</li> </ul>
Center for Disabilities, Pueblo	<ul style="list-style-type: none"> <li>1) Alamosa</li> <li>2) Baca</li> <li>3) Bent</li> <li>4) Conejos</li> <li>5) Costilla</li> <li>6) Crowley</li> <li>7) Custer</li> <li>8) Fremont</li> <li>9) Huerfano</li> <li>10) Kiowa</li> <li>11) Las Animas</li> <li>12) Mineral</li> <li>13) Otero</li> <li>14) Pueblo</li> <li>15) Prowers</li> <li>16) Rio Grande</li> <li>17) Saguache</li> </ul>	<ul style="list-style-type: none"> <li>1) Baca</li> <li>2) Bent</li> <li>3) Crowley</li> <li>4) Custer</li> <li>5) Fremont</li> <li>6) Huerfano</li> <li>7) Kiowa</li> <li>8) Las Animas</li> <li>9) Otero</li> <li>10) Prowers</li> <li>11) Pueblo</li> </ul>

CENTER	PART B	Part C
Center for Independence, Grand Junction	1) Delta 2) Chaffee 3) Eagle 4) Garfield 5) Gunnison 6) Hinsdale 7) Lake 8) Mesa 9) Montrose 10) Ouray 11) Pitkin 12) San Miguel	1) Delta 2) Eagle 3) Garfield 4) Grand 5) Gunnison 6) Hinsdale 7) Lake 8) Mesa 9) Montrose 10) Ouray 11) Pitkin 12) San Miguel
Center for People with Disabilities, Boulder	1) Adams (share w/ Atlantis) 2) Boulder 3) Broomfield 4) Gilpin 5) Jefferson (share w/ Atlantis)	1) Adams (share w/ Atlantis) 2) Boulder 3) Weld (share w/Connections)
Connections for Independence, Greeley	1) Logan 2) Morgan 3) Phillips 4) Sedgewick 5) Washington 6) Weld 7) Yuma	1) Larimer 2) Morgan 3) Washington 4) Weld (share w/ CPWD) 5) Yuma
Colorado Springs Independence Center dba The Independence Center, CO Springs	1) Cheyenne 2) El Paso 3) Kit Carson 4) Lincoln 5) Park 6) Teller	n/a
Disabled Resource Services, Fort Collins	1) Jackson 2) Larimer	n/a
Northwest CO Center for Independence, Steamboat	1) Grand 2) Moffat 3) Rio Blanco 4) Routt 5) Summit	n/a
Southwest Center for Independence, Durango	1) Archuleta 2) Dolores 3) La Plata 4) Montezuma 5) San Juan	n/a

### 3.2 Expansion of Network – 34 CFR 364.25

Describe the design for the further expansion of the network, including identification of the unserved and underserved areas in the State and the order of priority for serving these areas as additional funding becomes available (beyond the required cost-of-living increase).



<b>0</b>	<b>Red</b>	<b>101 - 500</b>	<b>Blue</b>
<b>1 - 10</b>	<b>Orange</b>	<b>501 - 1000</b>	<b>Indigo</b>
<b>11 - 50</b>	<b>Yellow</b>	<b>1000+</b>	<b>Violet</b>
<b>51 - 100</b>	<b>Green</b>	<b>X</b>	<b>23 Frontier Counties</b>

The above map is of the number of people served in each county 03/2016 – 02/2017, which includes the recently defunct Mile High Independent Living Center. We do not anticipate that the same areas will remain un-served or underserved with our new State General Funds Allocation, but we do acknowledge that many areas of Colorado are difficult to serve because of high mountain passes and the frontier nature of much of the state.

All of Colorado’s 64 counties lie within the service area of either a Part C or non-Part C Center; 18 counties are within the service areas of the state’s 4 non-Part C

Centers, however, a study the SILC and the network of Centers for Independent Living demonstrates a continued need across the state.

### **Underserved Counties and Populations**

There is a high percentage of underserved areas within the existing network of CILs in Colorado. A recent report compiled by the information submitted by the CILs for monthly reporting show nine (9) counties without a single service. There are seventeen (17) counties that have less than 5 individuals receiving services. Although these are predominantly rural and frontier counties, the urban CILs also find populations are not being served as resources are scarce.

### **Expansion of Network**

Efforts to expand and strengthen the network of CILs in Colorado will involve working closely with state and federal entities toward the allocation of additional funding for the establishment and operation of the CILs. Should funding become available, a competitive process will be conducted which will define criteria for selection. Priority will be given to applicants with a 51% cross-disability board in place, that have filed for incorporation and obtained a 501(c)(3) tax exempt status and can demonstrate compliance with the six (6) Standards and Indicators. Such applicants will be in the best position to initiate the core services of a Center for Independent Living.

### **Strengthening the Network of Current CILs**

In addition to adding CILs to the network of current CILs, the SILC and DSE are committed to pursuing increased funding that will allow for financial support to bring existing CILs up to a baseline level determined by a joint consensus of the SILC, DSE and network of existing CILs. Funding will also be pursued to expand the capacity of CILs to reach underserved populations within the existing service areas.

### **Funding Requirement of a New CIL**

The Independent Living Research Utilization program conducted a nationwide study in 1999 of urban and rural CILs to determine the minimum budget for a CIL. They assumed a typical start-up CIL would need an Executive Director, a bookkeeper, a secretary and two (2) Independent Living Advisors to meet the Title VII, Part C requirements. While we are not guaranteed to get it in State General Funds, in Colorado we have decided that any new Center will require a minimum of \$600,000 in base funding in order to provide quality services throughout our large rural and frontier catchment areas. Part B & C funding don't come close to providing the money for a new Center. In order to receive SILS funding, all centers must be currently certified in compliance with Title VII, Section 725 of the Federal Act, as defined in 34 CFR 366.60.

## Funding Priorities

The priorities for the designation of additional funds will be determined by a consensus between the SILC, DSE and network of existing CILs. The following will be used to determine allocations:

1. *Funds Below Regular Allocation:* Funds under the determined amount of the regular Part C allocation, the formula for Part B, or the SGF base of \$600,000 (or other funds that include a provision for continuation), will be used to bring additional money to existing CILs. Funds will be distributed based on the order of greatest need. Greatest need will be determined by consensus of the SILC, DSE and network of existing CILs.
2. *Funds Above Regular Allocation:* Funds above the determined amount of the regular Part C allocation, the formula for Part B, and the SGF base will be used to establish a new CIL, providing:
  - a. An identified need by consensus of the SILC, DSE and networking of current CILs, exists, **AND**
  - b. It will not jeopardize the Part C funding of existing CILs, **AND**
  - c. It will not impact the abilities of current CILs to provide the core services.
3. *Short Term Funding:* Funds that are short term in nature and do not have a provision for ongoing sustainability will be used for special projects, or to expand the capacity of existing CILs, with an emphasis on underserved populations (as defined previously through consensus of the SILC, DSE and existing network of CILs). Applicable funding will use the defined funding formulas.

## Closing of a Center for Independent Living

In the event that a Center funded by Title VII, Part B or C should close, the SILC, DSE and the existing network of CILs will coordinate, and reach by consensus, the distribution of funds previously allocated to the closed CIL. Should such funds remain available for the State, funding will be distributed according to the established funding formula. Of note, however, is that the areas and populations previously served by the now closed CIL will be considered unserved (except by counties served dually by another CIL) for purposes of determining priorities previously mentioned. When a Part C Center closes, the ILA will issue an RFP to compete for services in the same service area.

### 3.3 Section 723 States Only – 34 CFR 364.39

3.3A If the State follows an order of priorities for allocating funds among centers within a State that is different from what is outlined in 34 CFR 366.22, describe the alternate order of priority that the DSU director and the SILC chair have agreed upon. Indicate N/A if not applicable.

N/A

3.3B Describe how the State policies, practices and procedures governing the awarding of grants to centers and the oversight of these centers are consistent with 34 CFR 366.37 and 366.38.

N/A

## **Section 4: Designated State Unit (DSU)**

### **4.1 Administrative Support Services – 34 CFR 364.4; 34 CFR 364.22(b)**

4.1A Describe the administrative support services to be provided by the DSU for the SILS (Part B) program and, if the State is a Section 723 State, for the CIL (Part C) program.

- Refer to the SPIL Instructions for additional information about administrative support services.

The DSE employs a .50 FTE to serve as the state’s IL Program Coordinator. This person attends all SILC meetings and provides technical assistance. The role of the ILPC with the network of Centers includes monitoring, oversight, and technical assistance. The ILPC promotes collaboration between the Centers, the SILC, and the DSE.

4.1B Describe other DSE arrangements for the administration of the IL program, if any.

N/A

## **Section 5: Statewide Independent Living Council (SILC)**

### **5.1 Resource plan – 34 CFR 364.21(i)**

5.1A Describe the resource plan prepared by the SILC in conjunction with the DSU for the provision of resources, including staff and personnel, made available under parts B and C of chapter 1 of title VII, section 101(a)(18) of the Act, and from other public and private sources that may be necessary to carry out the functions of the SILC identified in section 705(c). The description must address the three years of this SPIL.

- Refer to the SPIL Instructions for more information about completing this section.

For the duration of this state plan, the primary support for the SILC will be an annual grant from Title VII, Part B of the Rehabilitation Act of 1973, as amended and administered by the DSE. The SILC has an approved budget for the expenditure of these funds. Ten percent of the proposed expenditures can be reclassified by the SILC without the need for an amendment. The budget can be revised by mutual agreement of the SILC and DSE. The proposed budget is contingent on available funds.

5.1B Describe how the following SILC resource plan requirements will be addressed:

- The SILC’s responsibility for the proper expenditure of funds and use of resources that it receives under the resource plan.
- Non-inclusion of conditions or requirements in the SILC resource plan that may compromise the independence of the SILC.
- Reliance, to the maximum extent possible, on the use of resources in existence during the period of implementation of the State plan.

Proper use of fiscal resources is routinely monitored. This includes: review of SILC billings for reimbursement, discussion of budget status at quarterly SILC meetings, and compliance with established protocols should budget changes be requested.

The SILC remains very aware of and safeguards its independence. Nothing in the resource plan jeopardizes its autonomy. Furthermore, the resource plan reflects prudent planning for operational needs, while taking into account full use of available resources

### 5.2 Establishment and Placement – 34 CFR 364.21(a)

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies.

The Colorado SILC was established following revisions to the Rehabilitation Act of 1973, as amended in 1992, under Senate Bill 97-141. It is an autonomous body with control of its finances for which the DSE is the fiduciary agent. The SILC is awarded a budget amount by DVR and the Centers, but creates its own line item allocations and makes its own decisions about expenditures. Members are appointed by the governor through the state's Boards and Commissions office. The SILC has a process in place for recruiting, interviewing, and choosing new SILC members. Recommendations are made to Boards and Commissions, and appointments are made by the governor. The DSE plays no part in membership or financial decisions other than ensuring compliance with state fiscal rules and the executive order that established the Colorado SILC.

The SILC meets five to six times per year at different locations around the state in order to hear public comment, be visible in the community, expend the travel budget as equitably as possible, and acquaint SILC members with Colorado's CILs. Committee meetings are usually accomplished by conference call.

The SILC, as part of its Resource Plan, is researching the viability of becoming a private, non-profit 501(c)(3) organization that functions as a fully autonomous entity. In this capacity the SILC may lease an office, retain staff, conduct daily activities and administer both public and private funds. Funding for the SILC originates with the Administration for Community Living. Those funds are then granted to the SILC by the DSE. Becoming a 501(c)(3) will also allow for additional funds to be raised from other sources, both public and private, to accomplish its mission.

While the SILC has a very effective collaborative working relationship with its DSE and other state agencies, the organization is recognized and operates as an independent entity with autonomy in its daily operations, development and implementation of the SPIL and advocacy for Independent Living issues for Coloradans with disabilities.

### 5.3 Appointment and Composition – 34 CFR 364.21(b) – (f)

Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b).

The Colorado SILC, follows all mandates set out in Section 705 of the Rehabilitation Act of 1973, as amended. These slots must be filled in accordance with Section 705. The SILC By-Law reflects the same composition.

Although the SILC reviews applications and makes recommendations for membership, the final membership decision is made by the Governor as applications are presented by the State Boards and Commissions office. Boards and Commissions acknowledge the necessity of compliance with Section 705 and the Executive Order in regard to SILC composition. New members can only be added if they do not adversely affect the balance of a majority of people with disabilities who are not state or CIL employees. It is also the responsibility of that office to determine which slot is to be filled, and whether the member fills the remainder of an existing term or the full term of a vacancy. SILC By-Laws reflect Section 705 and the Executive Order as to the term limits of two full three year terms for any SILC member.

The DSE is included in this process by an internal memo that includes the entirety of information to be forwarded to Boards and Commissions.

#### 5.4 Staffing – 34 CFR 364.21(j)

Describe how the following SILC staffing requirements will be met:

- SILC supervision and evaluation, consistent with State law, of its staff and other personnel as may be necessary to carry out its functions.

\$29,000 in Part B funds are allocated to contract with a part time SILC Coordinator beginning October, 2016, and \$30,000 beginning October, 2018.

The Coordinator will provide support for holding meetings throughout the state, and for organizing the goals and objectives in this plan. The DSE's IL Program Coordinator assists the SILC with anything that requires access to the state accounting system, or required contracts or agreements with the state.

This is where resource planning will be imperative for the SILC. If money becomes available the SILC will have a full time Coordinator. Even with the Joint Budget Committee setting aside \$356,000.00 for Office for Independent Living staff at the Colorado Department of Labor and Employment (CDLE), if we use that money to pay a Coordinator, the person would be an employee of DVR. The SILC can either prioritize becoming a 501(c)3 so we can hire our own FT Coordinator/Director or we will have to look at how we can divert the monies another way. The Legislature has put aside money for a new Office of Independent Living under DVR and Colorado Department of Labor and Employment. We need to find a way to make the Coordinator full time, but without funneling additional money through the Office of Independent Living, because then the person would have to be an actual employee of DVR. While it might be good to have administrative access to a state employee, most of us feel the autonomy is more important, and we will need to have these discussions.

We must reach consensus about how we will organize the SILC (i.e., incorporating as a 501(c)3 ) as soon as is possible so that we can work on getting money for a full time Coordinator. We have concerns about the seeming "Catch 22" of DVR funding restrictions. The SILC Allocations Committee had concerns about having deliverables before asking the CILs for any more Part B money, and about ensuring that we keep the lines clear to ensure that neither DVR nor the CILS are running the SILC



- Non-assignment of duties to SILC staff and other personnel made available by the DSU, or any other State agency or office, that would create a conflict of interest while assisting the SILC in carrying out its duties.

The SILC Coordinator contracts with the state to serve the SILC. If the SILC decides to become 501(c)3 we could contract with the State and contract or hire our own staff. The SILC Coordinator works independently from a location other than the DSE, and is supervised by the SILC Chair.

## **Section 6: Service Provider Requirements**

Describe how the following service provider requirements will be met:

### **6.1 Staffing – 34 CFR 364.23; 34 CFR 364.24; 34 CFR 364.31**

- Inclusion of personnel who are specialists in the development and provision of IL services and in the development and support of centers.

The DSE monitors the centers for independent living, making sure that services are being provided by qualified staff in compliance with 34 CFR 354.23.

- Availability, to the maximum extent feasible, of personnel able to communicate (1) with individuals with significant disabilities who rely on alternative modes of communication, such as manual communication, nonverbal communication devices, Braille, or audio tapes and (2) in the native languages of individuals with significant disabilities whose English proficiency is limited and who apply for or receive IL services under title VII of the Act.

In addition to typical monitoring and site reviews, the DSE reviews the centers' 704 reports and takes note of each center's ability to communicate in appropriate alternative formats.

- Establishment and maintenance of a program of staff development for all classes of positions involved in providing IL services and, where appropriate, in administering the CIL program, improving the skills of staff directly responsible for the provision of IL services, including knowledge of and practice in the IL philosophy.

The DSE and RSA review the centers' 704 reports and take note of training needs.

- Affirmative action to employ and advance in employment qualified individuals with significant disabilities on the same terms and conditions required with respect to the employment of individuals with disabilities under section 503 of the Act.

All Colorado Centers for Independent Living must have a non-discrimination policy. Centers must also comply with the federal mandate that at least 51% of a center's staff be people with significant disabilities.

## 6.2 Fiscal Control and Fund Accounting – 34 CFR 364.34

- Adoption of those fiscal control and fund accounting procedures as may be necessary to ensure the proper disbursement of and accounting for funds made available through parts B and C of chapter 1 of title VII of the Act, in addition to complying with applicable EDGAR fiscal and accounting requirements.

The DSE requires that all certified centers meet these fiscal requirements and monitors accordingly.

## 6.3 Recordkeeping, Access and Reporting – 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37

- Maintenance of records that fully disclose and document the information listed in 34 CFR 364.35.

All contracts for independent living services between the DSE and the CILs require assurances of record keeping in compliance with federal requirements. The DSE audits consumer service records as a typical element of a site review.

- Submission of annual performance and financial reports, and any other reports that the Secretary determines to be appropriate

Based on contractual agreement and state IL Rules, the DSE receives and reviews the annual performance reports of all of the centers for independent living.

- Access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, for the purpose of conducting audits, examinations, and compliance reviews, to the information listed in 34 CFR 364.37.

The DSE provides access to such documents to any duly authorized entity.

## 6.4 Eligibility – 34 CFR 364.40; 34 CFR 364.41

- Eligibility of any individual with a significant disability, as defined in 34 CFR 364.4(b), for IL services under the SILS and CIL programs.

Any individual with a significant disability is eligible for independent living services as described in this document.

- Ability of any individual to seek information about IL services under these programs and to request referral to other services and programs for individuals with significant disabilities.

Information and referral continues to be a core service of all CILs, and is available to eligible consumers and the general public upon request.

- Determination of an individual's eligibility for IL services under the SILS and CIL programs in a manner that meets the requirements of 34 CFR 364.51.

To be deemed eligible for services, an individual must declare that he or she has a significant disability that limits an activity of daily living and impedes his or her ability to live independently in the community. There are 3 ways to determine eligibility: self-disclosure, staff observation and medical records.

- Application of eligibility requirements without regard to age, color, creed, gender, national origin, race, religion, or type of significant disability of the individual applying for IL services.

All eligible consumers are served without regard to age, color, creed, gender, national origin, race, religion, or type of significant disability

- Non-exclusion from receiving IL services of any individual who is present in the State and who is otherwise eligible for IL services, based on the imposition of any State or local residence requirement.

No eligible consumer is excluded due to residence requirements.

#### 6.5 Independent Living Plans – 34 CFR 364.43(c)

- Provision of IL services in accordance with an IL plan complying with Sec. 364.52 and mutually agreed upon by the individuals with significant disabilities and the appropriate service provider staff unless the individual signs a waiver stating that an IL plan is unnecessary.

Independent Living Plans, with goals and objectives mutually agreed upon, must be included in the consumer service record, and must be updated as necessary.

#### 6.6 Client Assistance Program (CAP) Information – 34 CFR 364.30

- Use of accessible formats to notify individuals seeking or receiving IL services under chapter 1 of title VII about the availability of the CAP program, the purposes of the services provided under the CAP, and how to contact the CAP.

A document describing access to CAP services in the most appropriate format for the consumer is issued during the IL intake, and a signed copy becomes part of the consumer service record. CAP information must also be issued at plan development and at case closure.

#### 6.7 Protection, Use and Release of Personal Information – 34 CFR 364.56(a)

- Adoption and implementation of policies and procedures meeting the requirements of 34 CFR 364.56(a), to safeguard the confidentiality of all personal information, including photographs and lists of names.

A confidentiality agreement is a standard part of the IL intake process, and a signed document is included in the consumer service record. Contracts with the DSE require compliance with CFR 364.56(a) and additionally require compliance with HIPAA if any medical information becomes part of the consumer's file. The confidentiality policy is examined at the annual site review, and the use of the facility is observed and questions are asked regarding the location of confidential discussions between consumer and CIL staff.

### **Section 7: Evaluation**

Describe the method that will be used to periodically evaluate the effectiveness of the plan in meeting the objectives established in Section 1. The description must include the State's evaluation of satisfaction by individuals with significant disabilities who have participated in the program. 34 CFR 364.38

The SILC SPIL Committee meets monthly to evaluate the progress of SPIL objectives and activities. Goals and objectives of the SPIL will be posted on the SILC website accompanied by progress reports. In addition, the SILC will use the website to post surveys that will reach consumers across the state. These surveys will provide information about how the SPIL is working for those individuals, and will help the SILC and DSE collect information that can be used in the next SPIL cycle.

### **Section 8: State-Imposed Requirements**

Identify any State-imposed requirements contained in the provisions of this SPIL. Indicate N/A if not applicable. 34 CFR 364.20(h)

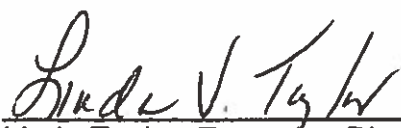
Operations of the SILC are constricted by state regulations governing the operations of state agencies including Boards and Commissions, reports required, accounting practices, funding mechanisms, procurement rules, allowable expenses, personnel policies, and travel reimbursement.

Candie Dalton, Executive Director of the Atlantis Community DATE



6/3/2014

Larry Williams, Executive Director of the Center For Disabilities DATE



6/3/16

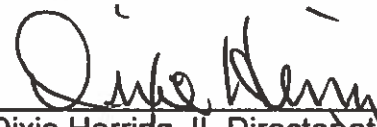
Linda Taylor, Executive Director of the Center For Independence DATE

Patricia Ziegler, Executive Director of Connections for Independent Living DATE



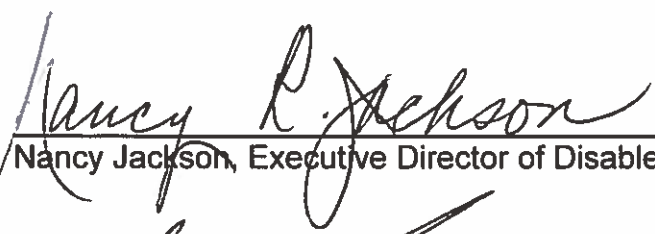
6/3/16

David Robinson, Executive Director of the Center for People With Disabilities DATE



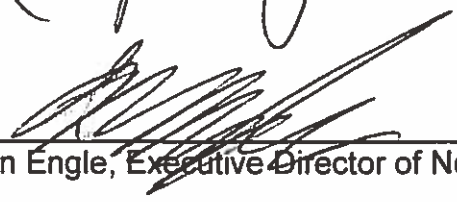
6/3/16

Dixie Herring, IL Director of The Independence Center DATE



6-3-16

Nancy Jackson, Executive Director of Disabled Resource Services DATE



6/3/16

Ian Engle, Executive Director of North West Colorado Center for Independence DATE



06/03/2016

Martha Mason, Executive Director of South West Center for Independence DATE