

COLORADO STATE PLAN FOR INDEPENDENT LIVING (SPIL)

Subchapter B –Independent Living Services

Subchapter C - Centers for Independent Living

State: Colorado

Fiscal Years: 2021-2023

Effective Date: October 1, 2020

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number (OMB 0985-0044). Public reporting burden for this collection of information is estimated to average 240 hours per response, including time for gathering and maintaining the data needed and completing and reviewing the collection of information. The obligation to respond to this collection is required to receive financial assistance (Title VII of the Rehabilitation Act of 1973, as amended).

Executive Summary

The SILC held strategic planning during the previous SPIL and developed new mission and vision statements:

Mission: “Paving the pathways to full participation for the community of people with disabilities served by Colorado’s centers for independent living.”

Vision: 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.

In alignment with both of these, the 2021-2023 SPIL is focused on:

- 1) Developing a strong and effective IL Network,
- 2) Increasing the Colorado Centers for Independent Living influence in state and national systems advocacy efforts to ensure public policies represent all members of the disability community, and
- 3) Increasing outreach, community education and employment efforts, and
- 4) Exploring whether to become a 723 state.

These goals will include several objectives and indicators of success, including:

- Increase partnerships and communication with state government agencies
- Active engagement and involvement in the development of rules, statutes, and other policy documents with a focus on housing, transportation, community living, accessibility.
- Provide educational opportunities in local communities to increase recognition that a civil and independent life for people with is seen by all as normal, attainable, and not an undue cost or burden to society.
- Continue with the Youth Leadership Forum (YLF) while additionally exploring the possibility of: 1. Holding a virtual YLF; 2 Holding a hybrid of virtual/in-person YLF(s); 3. Adding another location in the western/central area of the state.
- Education activities on what it would mean to be a 723 state

We'll know we are moving toward success when:

- Meetings between designated state agencies and IL Network increase from as needed (current state) to quarterly.
- CIL Network will provide at least one non-partisan education/training (to county clerks and consumers) on consumers’ right to vote prior to each local, state and national election. (Education/training may be provided directly by the CIL Network, or another partner agency)
- The CIL Network will highlight successes of peer models at least quarterly through newsletters, websites, testimonials shared with community partners.
- The YLF will be expanded, including the hiring of a YLF Coordinator, increased opportunities for virtual/hybrid YLFs, and a second location added when the YLF is in person, focusing on the Western area of CO.
- A decision is made on whether to be a 722 or a 723 state.

The 2021-2023 State Plan for Independent Living also includes:

- A chart of services currently being provided by the existing CILs as well as a description of their service areas.
- A financial plan showing current resources and their uses and a chart with detailed uses of the federal and state funds governed by this plan.
- An outreach plan detailing activities to be implemented to reach out both statewide and unserved/underserved populations.
- A detailed evaluation plan to monitor, review and evaluate the implementation of this plan.

The Statewide Independent Living Council (SILC), Centers for Independent Living, and the Designated State Entity (CO Division of Vocational Rehabilitation/Office of Independent Living Services) will continue to work closely with each other to collaborate on opportunities to maximize resources to support community life for people with disabilities.

The SILC has broad statewide representation, which provides opportunities for coordination. The SILC and full CIL Network participate in many collaborations at the state level, ensuring CILs are maximized and the IL philosophy is infused throughout CO.

The last sections of the plan focus on legal assurances and authorities as well as the signatures of the SILC Chairperson and the Director of the Designated State Entity agreeing to comply with them. In addition, the signatures of the SILC Chairperson and the CIL Directors agreeing to the content of the plan and authorizing its submission to the Administration for Community Living, US Department of Health and Human Services.

It is not anticipated that all the goals and objectives can be achieved in the three years covered by this plan. We've heard from our partners and consumers that access to a CIL is critical and our goals and objectives reflect increasing these opportunities. The SPIL team included CIL Directors, the SILC, the DSE and input from our stakeholders to continue to build our CIL Network.

Section 1: Goals, Objectives and Activities

1.1 Mission

Mission of the Independent Living Network and the SPIL.

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."

Vision: 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.

1.2 Goals

Goals of the IL Network for the three-year period of the plan.

Colorado's Independent Living Partners (DSE, SILC, and the Statewide Network of Independent Living Centers) commit the next three years to:

- Developing a strong and effective IL Network,

- Increasing the Colorado Centers for Independent Living influence in state and national systems advocacy efforts to ensure public policies represent all members of the disability community, and
- Increasing outreach, community education and employment efforts.
- Making a decision on becoming a 723 state or remaining a 722 state.

1.3 Objectives

Objectives for the three-year period of the plan – including geographic scope, desired outcomes, target dates, and indicators. Including compatibility with the purpose of Title VII, Chapter 1.

1. Developing a strong and effective IL Network Objectives:

1. Increase partnerships and communication with state government agencies:
 - i. Improve effective communication with leaders of state agencies and boards, including: HCPF, DOLA, CDHS and CDLE/DVR to coordinate membership on committees and relevant stakeholder groups.
 - ii. Invite targeted representatives to serve on the SILC or appropriate SILC Committees.
 - iii. Quarterly meetings between designated representatives of above agencies and IL Network, including the SILC, will occur.

Indicators:

- a. Meetings between designated state agencies and IL Network increase from as needed (current state) to quarterly.
- b. Regular and consistent dissemination of information and resources to consumers and stakeholders results in:
 - i. Consumers increased ability to navigate systems
 - ii. Systems are viewed by consumers as more user friendly
 - iii. More timely services

2. Increase the Colorado Centers for Independent Living influence in state and national systems advocacy efforts to ensure public policies represent all members of the disability community.

Objectives:

1. Active engagement and involvement in the development of rules, statutes, and other policy documents with a focus on housing, transportation, community living, accessibility.
2. Ensure statewide policies are designed to equitably benefit both urban and rural communities.
3. Give consumers the tools and resources to lead system advocacy efforts.
4. Support consumers in civic engagement such as voting.
5. Ensure statewide policies do not include implicit bias against people of color or other multiply marginalized communities.

Indicators:

- a. CIL Network will provide at least one non-partisan education/training (to county clerks and consumers) on consumers' right to vote prior to each local, state and national election. (Education/training may be provided directly by the CIL Network, or another partner agency)
- b. Tools for systems advocacy will be made available through various means (including dissemination through websites, social media, hard copy) and ensuring tools are available in a variety of accessible formats, and updated as needed at least yearly.
- c. At least one statewide training a year will occur focused on intersectional equity to promote equitable practices when developing public policies. (Training may be provided directly by the CIL Network or through another partner agency)
- d. Current policy issues will be now be tracked through consistent and regular outreach with state agencies and stakeholder meetings, ensuring that a CIL Network member is present at relevant meetings to provide input on policy issues.

3. Increase outreach, community education and employment efforts.

Objectives:

1. Engage local communities to recognize, respect and understand the strengths and needs of the disability members in those communities (these needs can include accessible housing, accessible and available transportation).
2. Provide educational opportunities in local communities to increase recognition that a civil and independent life for people with is seen by all as normal, attainable, and not an undue cost or burden to society.
3. Educate communities on peer models and their success.
4. Increase employment opportunities for youth and people with disabilities.
5. Continue with the Youth Leadership Forum and expand if possible, both through virtual/hybrid options, and add another location in the western/central area of the state.

Indicators:

- a. The CIL Network will provide at least quarterly educational opportunities in local communities (these can include posting white papers on Network websites, webinars, facilitated training, etc.).
- b. The CIL Network will highlight successes of peer models at least quarterly through newsletters, websites, testimonials shared with community partners.
- c. The CIL Network will explore and implement expanded remote technology to reach more people with disabilities.
- d. The CIL Network will expand employment opportunities, including those for youth with disabilities, by expanding fee for service and contract opportunities for pre-employment transition services.
- e. The SILC will hire an Executive Director of the SILC who will initiate the possible expansion of YLF to include hiring a YLF Coordinator and in conjunction with the Executive Director, will continue with the Youth Leadership Forum (YLF) while additionally exploring the possibility of: 1. Holding a virtual YLF; 2 Holding a hybrid of virtual/in-person YLF(s); 3. Adding another location in the western/central area of the state.

4. Making a decision on becoming a 723 state or remaining a 722 state

Objectives:

1. Education activities on what it would mean to be a 723 state
2. Hold facilitated team-building session(s) that includes the SILC, all nine (9) Centers for Independent Living and the Colorado Office of Independent Living Services (the Office) staff to determine approach that will develop the following:
 - i. Pros and cons of being a 723 state verses a 722 state
 - ii. Determine the process for making a decision
 - iii. If we make the decision to be a 723 state, what steps need to occur to implement

Indicators:

- a. The State of Colorado will become a 723 state or,
- b. The State of Colorado remains a 722 state

1.4 Evaluation

Methods and processes the SILC will use to evaluate the effectiveness of the SPIL including timelines and evaluation of satisfaction of individuals with disabilities.

Narrative: To facilitate the SILC's duty to monitor, review, and evaluate the implementation of the State plan, the CO IL Network (CILs, SILC, and DSE) agrees to the evaluation plan as described below.

An ad hoc committee of the SILC will evaluate the effectiveness of the SPIL and CIL consumer satisfaction levels through:

- Conducting quarterly Survey Monkeys (this can be done through phoning a random sample of consumers and partners each quarter and the interviewer in-putting answers into Survey Monkey and through posting of a Survey Monkey on SILC and CIL websites for consumers and partners to access directly),
- Outreach to all CIL Directors quarterly to receive updates on relevant objectives,
- Facilitating yearly focus groups in various areas of the state to gather input from CIL consumers, partners, and stakeholders on the effectiveness of the SPIL goals,
- Reviewing PPRs each year (and monthly progress reports each quarter) to identify areas of success or continued barriers in serving targeted geographic areas, unserved and underserved populations, and
- A yearly report will be generated from above evaluation steps; report will be distributed and reviewed with CIL Directors and full SILC. This will allow the SILC to identify any issues that would indicate the need to adjust the SPIL in response to the evaluation results. Through consultation with the CILS, a decision can then be made as to whether a SPIL amendment should be developed.

1.5 Financial Plan

Sources, uses of, and efforts to coordinate funding to be used to accomplish the SPIL Goals and Objectives. Process for grants/contracts, selection of grantees, and distribution of funds to facilitate effective operations and provision of services.

Note: Deviation from this projected budget plan may require a technical amendment.

Notes regarding Sources:

- Other Federal Funds include, but are not limited to, title I funds available under section 101(a)(18) of the Act, Social Security payments, funding from Housing and Urban Development, and funding received from other Federal programs such as the Work Incentives Planning and Assistance (WIPA) program.
- Non-Federal Funds include, but are not limited to, State and local government funds as well as nongovernment funds from individual donors, foundations, corporations and community organizations. State government funds include matching funds in compliance with section 712(b) of the Act, general revenue funds and funds made available through other State programs such as Medicaid reimbursements, Aging and Developmental Disabilities Councils, etc.

Fiscal Year(s): 2021, 2022, 2023					
Sources	Projected Funding Amounts and Uses				
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities	Retained by DSE for Administrative costs (applies only to Part B funding)
Title VII Funds	\$101,615	0	\$1,477,362	0	
Chapter 1, Part B (including state match)	\$101,615	0	\$220,166	0	\$16,935
Chapter 1, Part C	0	0	\$1,257,196	0	
Other Federal Funds	\$63,776	0	\$249,866		
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$37,776	0	0	0	
Social Security Reimbursement	0	0	0	0	
Other: CARES Act Funding			\$1,215,013		
Other	\$30,000 (FY2020-21 only)	0	\$249,866	0	

Non-Federal Funds (include the match amount in non-federal funds)	\$30,224	0	\$6,800,847	0	
State Funds	\$10,224	0	\$6,800,847	0	
Other	\$20,000	0	0	0	

Narrative: All Part B funds are extrapolated from FY 2020 allotment. Chapter C funds taken directly from ACL website. Section 101 (Innovation and Expansion) is calculated by 78.7% of \$48,000 DSE I&E funds. Other: \$30,000 is a contract with the CO DD Planning Council for the YLF and \$249,866 is the yearly amount for the 5 CILs participating in the SEEKS grant as well as 2019 PPR amount for other federal funds. Non Federal Funds: \$6,800,847 includes Part B match funds from the CILS and 10% match of received Part B funds of \$1,693. State funds of **\$10,224 is the State Match** for the \$48,000 of I&E funds. Additionally, the \$6,800,847 is the SFY 2020 allotment amount. Other amount includes \$5,000 anonymous donation to send youth to APRIL Conference and \$15,000 donated to assist the SILC in becoming a 501c3. These other amounts are for FY2021 only.

Under other Federal funds, the \$1,215,013 identified in General CIL Operations is CIL CARES Act funding. Estimated CIL CARES Act funding amounts for 2020-2021 per each center are provided in the chart below.

CIL	CARES Act Funding	Proposed Services
Center for Independence	\$271,633	Technology to better connect satellite offices with main; improved building security and health safety (including PPE); increase board of directors technology access and admin support; increase case management staff in all offices for benefits counseling, employment and integration; create upper management position to oversee satellite office staff and outcomes; partner with food banks and emergency support personnel to address COVID-19 impacts.
Connections for Independent Living	\$123,549	Technology/equipment for staff and consumers, consumer and remote activities, safe operations (including PPE, etc), and other
Atlantis (office based)	\$240,046	Disaster preparedness coordinator, technology for

		remote services for consumers and staff, care kits including PPE, etc, cash assistance for rent and utilities, partnering with local food banks
Atlantis (mobile)	\$225,747	Disaster preparedness coordinator, technology for remote services for consumers and staff, care kits including PPE, partnership with food banks, pilot to provide hotel rooms when moving individuals out of nursing home transition facilities to quarantine for a min. of 2 weeks while services and housing is arranged, provide sleeping bags to those experiencing homelessness so they don't need to enter a shelter where risk of exposure to COVID-19 is higher.
Center for People with Disabilities	\$234,600	Services to support preventing, preparing and responding to COVID-19
Center for Disabilities (Center Toward Self Reliance)	\$119,437	Assist youth who have been affected by shuttering of schools to maintain educational requirements, collaborate with the Veterans Administration to support and provide services to veterans who have been impacted by job loss or lack of response to their job skills, assist elderly in lessening the impact of COVID-19, enhance services to deaf/blind population as they have been greatly impacted, provide more support for those transitioning from nursing homes.

Section 2: Scope, Extent and Arrangements of Services

2.1 Services

Services to be provided to persons with significant disabilities that promote full access to community life including geographic scope, determination of eligibility and state wideness.

Independent living services	Provided using Part B (check to indicate yes)	Provided using other funds (check to indicate yes; do not list the other funds)	Entity that provides (specify CIL, DSE, or the other entity)
Core Independent Living Services, as required: <ul style="list-style-type: none"> – Information and referral – IL skills training – Peer counseling – Individual and systems advocacy – Transition services including: <ul style="list-style-type: none"> ▪ Transition from nursing homes & other institutions ▪ Diversion from institutions ▪ Transition of youth (who were eligible for an IEP) to post-secondary life 	Yes	Yes	CILs
Counseling services, including psychological, psychotherapeutic, and related services	Yes	Yes	CILs
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 disabilities) Note: CILs are not allowed to own or operate housing.	Yes	Yes	CILs
Rehabilitation technology	Yes	Yes	CILs
Mobility training	Yes	Yes	CILs
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	Yes	Yes	CILs
Personal assistance services, including attendant care and the training of personnel providing such services	Yes	Yes	CILs
Surveys, directories and other activities to identify appropriate housing, recreation opportunities, and accessible transportation, and other support services	Yes	Yes	CILs
Consumer information programs on rehabilitation and independent living 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	Yes	Yes	CILs
Education and training necessary for living in the community and participating in community activities	Yes	Yes	CILs

Independent living services	Provided using Part B (check to indicate yes)	Provided using other funds (check to indicate yes; do not list the other funds)	Entity that provides (specify CIL, DSE, or the other entity)
Supported living Note: CILs are not allowed to own or operate housing.	Yes	Yes	CILs
Transportation, including referral and assistance for such transportation and training in the use of public transportation vehicles and systems	Yes	Yes	CILs
Physical rehabilitation	Yes	Yes	CILs
Therapeutic treatment	Yes	Yes	CILs
Provision of needed prostheses and other appliances and devices	Yes	Yes	CILs
Individual and group social and recreational services	Yes	Yes	CILs
Training to develop skills specifically designed for youths who are individuals with disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options	Yes	Yes	CILs
Services for children	Yes	Yes	CILs
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 disabilities	Yes	Yes	CILS
Appropriate preventive services to decrease the need of individuals with disabilities for similar services in the future	Yes	Yes	CILS
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	Yes	Yes	CILs
Such other services as may be necessary and not inconsistent with the Act	Yes	Yes	CILs

2.2 Outreach

Definition of Unserved and Underserved:

How services will be made available to populations that are unserved/underserved by Part B and Part C (including minority groups and urban and rural populations) and how outreach will be conducted.

Definitions:

Unserved and underserved definition: populations of individuals who are not being served through a CIL, or receive significantly fewer services by the CIL network. *This information is drawn from monthly reports of the CILSs, PPRs as well as a survey conducted by the SILC in 2019.*

Targeted Geographic Areas: defined as counties that had 15 or fewer individual served for the year in 2019 (*this information is drawn from monthly/annual reports and PPRs as well as a survey conducted by the SILC in 2019*).

Archuleta, Bent, Chaffee, Cheyenne, Clear Creek, Conejos, Crowley, Custer, Dolores, Elbert, Gilpin, Hindsdale, Huerfano, Jackson, Kiowa, Kit Carson, Lake, Mineral, Ouray, Park, Phillips, Rio Blanco, Saguache, San Juan, San Miguel, Sedgewick, Washington and Yuma.

Outreach to Geographic Areas: CIL Network will explore creative ways to develop satellite offices in rural areas – could be sharing office space with another agency. Once trust and relationships have been developed, ensuring on-going services are received through such means as appropriate, including video and tele conferences.

Underserved age groups: consumers under 5 are the least served age group with 25 served statewide; 6 - 24 are also underserved (462) in the CIL network (*as determined by the PPR*).

Outreach to underserved age groups:

HS youth with disabilities: CILs are continuing to provide increased outreach to youth in schools, such as through 2 successful YLFs; continuing and expanding services to youth in schools through fee for services pre-employment transition services.

Under 5: To increase CILs service to consumers under five (5) years of age, CILs will outreach to pre-kindergarten programs, Colorado Development Disabilities Council, schools, hospitals and other organizations that would connect CIL staff with families of toddlers that have disabilities with the result of expanding services to toddlers with disabilities and their families.

Underserved disabilities: Consumers with cognitive, mental/emotional, hearing and vision disabilities receive fewer services statewide (*as determined by the PPR*).

Outreach:

Hearing: CIL staff who serve this population will continue with quarterly meetings to share best practices, outreach ideas, and create communication opportunities for those with hearing disabilities. Medicaid recipients who are hearing impaired also meet quarterly to discuss services.

Mental/Emotional: Staff do not feel adequately trained to serve this population. CIL Network will explore avenues of training (could be through Office of Behavioral Health, SAMSA, Peer Organizations/Agencies, etc.), such as how to work with an individual with a significant mental illness, explore peer mentoring training for these populations.

Vision: CIL Network will outreach with the Colorado School for the Deaf and Blind, DVR's Blind and Low Vision Unit, to let these agencies share information that CILs can offer; increase peer groups for consumers with low vision and blindness.

Cognitive: Staff do not feel adequately trained to serve this population. CIL Network will explore avenues of training (could be through HCPF, ARCs, Autism Society, etc.), such as how to work with individuals with a variety of different cognitive disabilities; explore peer mentoring training for these populations.

2.3 Coordination

Plans for coordination of services and cooperation among programs and organizations that support community life for persons with disabilities.

Narrative: In order to increase awareness and understanding of the work of the CILS, and increase partnerships with state government, the IL Network will have effective communication with leaders of organizations that have an impact on our consumers. We will target HCPF, DOLA (DOH), Emergency Management, DVR, and DHS to coordinate membership on committees and stakeholder groups, invite targeted representatives to be on the SILC, and propose quarterly meetings between the leads of each department and the IL Network.

The SILC and full IL Network will continue to outreach to, and coordinate with, other state boards, councils and agencies with a focus on disabilities, including:

- DD Planning Council
- Mindsource (Brain Injury)
- Behavioral Health Planning Council
- State Rehabilitation Council
- Office of Employment First
- APSE
- Division of Vocational Rehabilitation
- Local Workforce Centers
- Local high schools and post-secondary entities
- The Colorado Advisory Council for Persons with Disability
- The Rocky Mountain ADA 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.
- State Youth Council
- State Workforce Development 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, 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

The SILC, CILS and DSE have a yearly planning retreat; the DSE has a representative on the SILC, and the SILC has a representative on the SRC. This allows for clear communication throughout the year. The SILC coordinates closely with the DD Planning Council in facilitating the yearly YLF.

Planning for a statewide IL conference continues to bring together all these networks, as well as inviting other entities that serve and advocate for people with disabilities.

Section 3: Network of Centers

3.1 Existing Centers

Current Centers for Independent Living including: legal name, geographic area and counties served, and source(s) of funding. Oversight process, by source of funds, and oversight entity.

Narrative: 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.

Legal Name	Counties Served and Funding Sources	Oversight Process	Oversight Entity	SPIL Signatory (Yes/No)
<i>Atlantis Community</i>	State General Funds State Formula Match Part B Arapahoe, Denver, Douglas, Elbert, Clear Creek, Adams, Jefferson (shared with CPWD) Part C: Arapahoe, Denver, Douglas, Elbert, Clear Creek, Jefferson (shared w/ CPWD), Adams (shared with CPWD) CARES Act Funding	Submit PPR to ACL/OILP, within 30 days submit to DSE after due date to federal government	ACL/OILP	
<i>Center for Disabilities (dba Center Toward Self Reliance)</i>	State General Funds State Formula Match Part B: Alamosa, Bent, Conejos, Costilla, Mineral, Rio Grande, Saguache Part C: Baca, Bent, Crowley, Custer, Fremont, Huerfano, Kiowa, Las Animas, Otero, Prowers, Pueblo CARES Act Funding	Contract for Part B CILS requires submit PPR to DSE by October 31 st . Part C: Submit PPR to ACL/OILP, within 30 days submit to DSE after due date to federal government	DSE and ACL/OILP	
<i>Center for Independence</i>	State General Funds State Formula Match Part B: Chaffee Part C: Delta, Eagle, Garfield, Grand, Gunnison, Hinsdale, Lake, Mesa, Montrose, Ouray, Pitkin, San Miguel CARES Act Funding	Contract for Part B CILS requires submit PPR to DSE by October 31 st . Part C: Submit PPR to ACL/OILP, within 30 days submit to DSE	DSE and ACL/OILP	

<i>Center for People with Disabilities</i>	State General Funds State Formula Match Part B: Broomfield, Gilpin, Jefferson (shared with Atlantis) Part C: Adams (shared w/ Atlantis), Boulder, Weld (shared w/ Connections) CARES Act Funding	Contract for Part B CILS requires submit PPR to DSE by October 31 st . Part C: Submit PPR to ACL/OILP, within 30 days submit to DSE	DSE and ACL/OILP	
<i>Connections for Independence</i>	State General Funds State Formula Match Part B: Logan, Phillips, Sedgewick Part C: Larimer, Logan, Washington, Weld (shared w/ CPWD), Yuma CARES Act Funding	Contract for Part B CILS requires submit PPR to DSE by October 31 st . Part C: Submit PPR to ACL/OILP, within 30 days submit to DSE	DSE and ACL/OILP	
<i>Colorado Springs Independence Center</i>	State General Funds State Formula Match Part B: Cheyenne, El Paso, Kit Carson, Lincoln, Park, Teller	Contract for Part B CILS requires submit PPR to DSE by October 31 st .	DSE and ACL/OILP	
<i>Disabled Resource Services</i>	State General Funds State Formula Match Part B: Jackson, Larimer	Contract for Part B CILS requires submit PPR to DSE by October 31 st .	DSE and ACL/OILP	
<i>Northwest Colorado Center for Independence</i>	State General Funds State Formula Match Part B: Grand, Moffat, Rio Blanco, Routt, Summit	Contract for Part B CILS requires submit PPR to DSE by October 31 st .	DSE and ACL/OILP	
<i>Southwest Center for Independence</i>	State General Funds State Formula Match Part B: Archuleta, Dolores, La Plata, Montezuma, San Juan	Contract for Part B CILS requires submit PPR to DSE by October 31 st .	DSE and ACL/OILP	

Note: DSE provides on-going fiscal/financial monitoring, either on site or desk audits for all CILs. DSE monitors compliance with the Rehab Act standards and indicators and WIOA relevant regulations. SILC and DSE create program performance report and DSE submits.

3.2 Expansion and Adjustment of Network

Plan and priorities for use of funds, by funding source, including Part B funds, Part C funds, State funds, and other funds, whether current, increased, or one-time funding, and methodology for distribution of funds. Use of funds to build capacity of existing Centers, establish new Centers, and/or increase state wideeness of Network.

Definition of served, unserved, and underserved:

Unserved and underserved definition: populations of individuals who are not being served through a CIL, or receive significantly fewer services by the CIL network. *This information is drawn from monthly reports of the CILSs, PPRs as well as a survey conducted by the SILC in 2019.*

Targeted Geographic Areas: defined as counties that had 15 or fewer individual served for the year in 2019 (*this information is drawn from annual reports and PPRs as well as a survey conducted by the SILC in 2019*).

Minimum funding level for a Center and formula/plan for distribution of funds to ensure that each Center receives at least the minimum.

State General Funds (SGF) make up the majority of funding for the Centers for Independent Living (CILs) in Colorado. The State Legislature passed a bill SB 15-240 that provides **each Certified CIL receives a base funding amount not less than \$600,000 per center**. For any amount of State General Funds above the base for each CIL, it is distributed in accordance to the funding formula agreed to by the CILs that address additional factors attributed to a funding formula which is found in State rules, 9.207.3.

9.207.3 STATE ALLOCATION FOR DELIVERY OF INDEPENDENT LIVING SERVICES

A. *The Block Distribution of state moneys to independent living centers.*

(A) *A base amount of not less than six hundred thousand dollars; and*

(B) *Other factors agreed to by the independent living centers, which may include a per capita adjustment, a per county adjustment, or other adjustments.*

B. *Certified Centers for Independent Living will be allocated General Funds in addition to their base amount of General Funds with a weighted formula that divides County disability population, plus County population, and Land Area by population to determine for each County. The resulting figure is the amount which each CIL will receive.*

Specific calculations of the formula are:

A. *1st assign each Colorado County a score of: 40% x (County 16-64 Disability Population/State 1664 Disability Population)*

B. *2nd add the weighted score of: 20% x (County 65+ Population/State 65+ Population)*

C. *3rd add the weighted score of: 40% x (County Quantile Average of Land Area/Population)*

D. *4th multiply this score of each County by the available funds;*

E. *5th divide it by 100.*

F. *6th sum up all the County scores from within each CIL's catchment area.*

CILS whose catchment areas share a County shall report to the Department, how they will allocate County scores between them. If these CILS do not reach an agreement, the Department shall determine and document the allocation of County scores between the CILS.

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. 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.

Match for Part B funds: The 10% match for the part B funds is established by the Centers for Independent Living through the contracts with the DSE. The DSE requires the CIL contractors provide proof and verification of the 10% Part B match. The CILs provide match at 14.62% to cover the Part B funds used by the SILC. The DSE provides match using State General Funds for their 5%.

Part B Formula:

As stated above, the CO CILS provide a match of 14.62% of Part B Funds to the SILC. The formula for the remaining 65% is distributed to the following CILs in this manner:

Atlantis: 3.89%

Center for Disabilities (Center Toward Self-Reliance): 13.39%

Center for Independence: 6.39%

Connections for Independent Living: 13.39%

Center for People with Disabilities: 6.39%

Colorado Springs Independent Living Center: 10.39%

Disabled Resource Services: 15.39%

Northwest CO Center for Independence: 15.39%

Southwest Center for Independence: 15.39%

Priorities for establishment of new CIL(s).

In exploration of becoming a 723 state, the CO CIL Network will look at county distribution currently in place to determine best coverage areas; should there be areas where limited services are available in certain counties, these areas/counties will be prioritized for the future establishment of a new CIL. Currently, the CIL network in Colorado serves all 64 Colorado Counties. The Colorado Division of Vocational Rehabilitation Rules Section 9.203.3 APPLICATION, CERTIFICATION AND RE-CERTIFICATION OF CENTERS [Eff. 4/1/13] demonstrates the steps necessary in establishing a new certified Center for Independent Living.

Action/process for distribution of funds relinquished or removed from a Center and/or if a Center closes.

In the case of a CIL closure, the rules established by the Colorado Division of Vocational Rehabilitation will be followed. The Colorado Division of Vocational Rehabilitation Rules: **9.207.2 INDEPENDENT LIVING ALLOCATIONS COMMITTEE [Rev. eff. 4/1/13] identifies the process for determining the distribution of funds relinquished or removed from a CIL.**

- A. The SILC, CIL Network, and DVR shall participate in an Independent Living Allocation Committee. The Chairperson of the SILC shall make the appointment of two members who are advocates for individuals with disabilities and are not affiliated with CILs. The CILs Network shall appoint two individuals. The Director of DVR will appoint two individuals. The total number of allocation committee members shall equal six, two from each group.
- B. The Independent Living Allocations Committee will work to establish criteria for allocating funds from the State General Fund for Independent Living and Federal Part B funds.
- C. All funding formulas submitted by the allocation committee shall be in compliance with State fiscal rules and regulations, current Federal and State laws and regulations, including annotations and footnotes in appropriations, and the State Plan for Independent Living.
- D. DVR/OIL will ensure that the Independent Living Allocations Committee participates in any change of funding allocation that is in DVR/OIL procedures. The final decision of how to allocate funds is the responsibility of DVR/OIL.

Plan to build capacity of existing CILs and/or expand state wideness by establishing branch offices and/or satellites of existing CILs.

The CO CIL Network will explore creative ways to develop satellite offices in rural areas, including sharing office space with another agency. Once trust and relationships have been developed, ensuring on-going services are received through such means as appropriate, including video and tele conferences.

Plan/formula for distribution of new funds (Part B, Part C, one-time funds, etc.)

Funds above the determined amount of the regular Part C allocation, the formula for Part B, and the SGF base will be used, providing:

- a. For Part B Funds: DSE receives 5%; SILC receives 30% with the remaining 65% distributed according to the Part B formula (attached)
- b. State General fund is distributed according to the formula described in Colorado Division of Vocational Rehabilitation rules section: 9.207.3

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). The funding source requirements will be followed.

CILs may independently apply for funding sources; CO's CIL Network has a best practice of collaborating with the DSE for seeking further funding sources that will benefit all centers. The CIL Directors and DSE meet monthly to discuss potential funding opportunities.

CARES Act: CIL CARES Act funding is direct between ACL and each CIL. The potential use of these funds extends through 9/30/21.

- During times of emergency situations, the CO SILC, the DSE and the CIL network will respond to the critical needs of Coloradoans with disabilities in their identified service areas and then work collaboratively in impacted areas outside of their direct control. The Federal CIL's will follow the guidance provided by ACL's 2018 Disaster Services Policy, found [here](#). The CILs will utilize this policy as applicable.

Plan/formula for adjusting distribution of funds when cut/reduced

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. (Formula for part b applies for state general funds; formulas need to be revisited when next census data is released) *The DSE has sought guidance from the attorney general to determine what will occur should the **state general fund** be decreased, reducing the \$600K to each CIL. As necessary, when adjusting the distribution of funds when cut/reduced, the rules established by the Colorado Division of Vocational Rehabilitation will be followed (9.207.2 INDEPENDENT LIVING ALLOCATIONS COMMITTEE)*

Plan for changes to Center service areas and/or funding levels to accommodate expansion and/or adjustment of the Network. State the needed change(s) as concretely and succinctly as possible.

Currently there is no plan for changes to center service areas – as 723 exploration continues and there is a decision to become a 723 State then the issue of new service catchment areas may be determined and the SPIL will be amended.

In general, the CO IL Network has continued plans to partner closely with DVR to provide and expand pre-employment transition services on a contract or fee for service basis. The SILC looks to become a 501c3 which will also allow for expansion of services throughout the state.

Section 4: Designated State Entity

The Colorado Department of Labor and Employment, Division of Vocational Rehabilitation, Office of Independent Living Services

Section 4: Designated State Entity

The Colorado Department of Labor and Employment, Division of Vocational Rehabilitation, Office of Independent Living Services will serve as the entity in Colorado designated to receive, administer, and account for funds made available to the state under Title VII, Chapter 1, Part B of the Act on behalf of the State.

4.1 DSE Responsibilities:

- (1) Receive, account for, and disburse funds received by the State under this chapter based on the plan;
- (2) Provide administrative support services for a program under Part B, and a program under Part C in a case in which the program is administered by the State under section 723;
- (3) Keep such records and afford such access to such records as the Administrator finds to be necessary with respect to the programs;
- (4) Submit such additional information or provide such assurances as the Administrator may require with respect to the programs; and
- (5) Retain not more than 5 percent of the funds received by the State for any fiscal year under Part B for the performance of the services outlined in paragraphs (1) through (4).

1. The DSE acknowledges its role as the fiscal intermediary to receive, account for and disburse funds received by the State to support Independent Living Services in the State.
2. The DSE must make timely and prompt payments to Subchapter B funded SILCs and CILs:
 - a) When the reimbursement method is used, the DSE must make a payment within 30 calendar days after receipt of the billing, unless the agency or pass-through entity reasonably believes the request to be improper;
 - b) When necessary, the DSE will advance payments to Subchapter B funded SILCs and CILs to cover its estimated disbursement needs for an initial period generally geared to the mutually agreed upon disbursing cycle;
 - c) The DSE will accept requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as necessary when electronic transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r);
3. The DSE will abide by SILC determination of whether the SILC wants to utilize DSE staff;
 - a) If the SILC informs the DSE that the SILC wants to utilize DSE staff, the DSE assures that management of such staff with regard to activities and functions performed for the SILC is the sole responsibility of the SILC in accordance with Section 705(e)(3) of the Act.
4. The DSE will assure that the agency keeps appropriate records, in accordance with federal and State law, and provides access to records by the federal funding agency upon request;
5. The DSE assures that the SILC is established as an autonomous entity within the State as required in Section 1329.14 of the WIOA regulations (45 CFR 1329.14);
6. The DSE will not interfere with the business or operations of the SILC that include but are not limited to:
 - a) Expenditure of federal funds,
 - b) Meeting schedules and agendas,
 - c) SILC board business,
 - d) Voting actions of the SILC Board,
 - e) Personnel actions,
 - f) Allowable travel,
 - g) Trainings.

The DSE will fully cooperate with the SILC in the nomination and appointment process for the SILC in the state.

4.2 Grant Process & Distribution of Funds

Grant processes, policies, and procedures to be followed by the DSE in the awarding of grants of Part B funds.

DSE follows the State's procurement rules in awarding contracts with the Centers for Independent Living in Colorado. The DSE executes contracts with the CILs to distribute both Part B funding and State General Funds. The DSE follows the funding formulas for Part B and

State General Funds respectively for each contract awarded to a CIL. The DSE rule under the Colorado Division of Vocational Rehabilitation, Independent Living Services: 9.200 address topics related to Certifying a Center for Independent Living; allocation of funds; and, a description of an allocation committee. To have an executed contract, CILs need to be certified by the state in accordance to the standards and indicators laid out in the Rehab Act. The state, along with a peer reviewer (CIL Director), conduct certification visits at a minimum of every three years, but may perform a visit when extenuating circumstances exist. The contracts are awarded based on the catchment area served. Annual fiscal desk audits occur with all CILs, conducted by state and DSE. The state requires that each contractor submit an interim progress report, annual progress report, and evaluation after each contract is completed. This process is the same for continuing funding as well as any new contracts. When a continuing resolution for federal funds is in place, the formula described previously is utilized.

4.3 Oversight Process for Part B Funds

The oversight process to be followed by the DSE.

The DSE follows state procurement rules for executing a contract related to Part B funds. The DSE follows federal uniform guidance in processing allowable reimbursements requested by a Center for Independent Living. The DSE conducts annual fiscal audits with each Center for Independent Living to ensure compliance with federal uniform guidance. The DSE hosts monthly financial manager calls with the CILs to answer any questions regarding expenditure of funds and budgeting. Additionally, the DSE conducts and requires CIL certification following the assurances and indicators outlines in the Rehabilitation Act of 1973 as amended. CIL certification is a requirement for the State to enter into a contract with State and federal funds in the provision of Independent Living Services.

4.4 Administration and Staffing

Administrative and staffing support provided by the DSE.

The 5% of the Part B appropriation is monitored by the Office of Independent Living Services and the Chief Financial Officer at DVR, and as such, does not draw down more than 5% of Part B appropriation. The remaining Part B funds are then distributed to the CO SILC (30%), and 65% are then distributed to the Part B CILs as designated by formula. The 5% administration costs are specifically used to serve as the fiscal sponsor of the SILC and oversee contracts with the CILs. The Office of Independent Living Services is primarily funded through state general funds and these funds are used to match Part B dollars. The Office of Independent Living Services will provide its budget quarterly to the SILC and CIL Directors.

When DSE employees serve as staff to the SILC, describe how the SILC will hire, fire, and supervise such staff.

The SILC and DSE conduct weekly meetings to discuss administrative requests, ensuring that administrative tasks are occurring in a satisfactory manner to the SILC. The SILC practices its autonomy of this issue through the regular meetings with DSE staff, directing DSE staff to perform specific tasks, such as submitting travel requests, other cost reimbursements, and providing regular input to DSE as needed. The CO SILC does not contract with the DSE for staffing support nor provide direct supervision to DSE staff. SILC supervision of administrative

tasks are conducted during the weekly meeting. The SILC chair meets individually with the DSE employee as necessary. When the CO SILC has formally become a 501c3, the Executive Director of the SILC will provide direct supervision, hiring and firing to clerical support for the SILC. The SILC Chairperson, with input from the SILC Executive Committee, will supervise the Executive Director.

Describe how the DSE will assure that such staff will not be assigned to other projects/activities that would create a conflict of interest with their SILC responsibilities.

DSE staff are not a member of the SILC, not voting members of SILC so there is no conflict of interest with the SILC. See above. The DSE has an official ex-officio member serving on the SILC (non-voting member), outside of the staff performing SILC related to cost reimbursements and other related tasks.

4.5 State Imposed Requirements

State-imposed requirements contained in the provisions of this SPIL including:

- State law, regulation, rule, or policy relating to the DSE’s administration or operation of IL programs
- Rule or policy implementing any Federal law, regulation, or guideline that is beyond what would be required to comply with 45 CFR 1329
- That limits, expands, or alters requirements for the SPIL

The State of CO requires an executive order to be in place for the SILC, this executive order mirrors all requirements for the Act and IL regulations. While the State serves as a fiscal sponsor of the SILC, the SILC must follow state procurement rules. As a contractor with the State (once 501c3 status obtained), the SILC must still abide by federal uniform guidance.

4.6 722 vs. 723 State

Check one: *To indicate which applies to your state*

722 (if checked, will move to Section 5)

723 (if checked, will move to Section 4.7)

Section 5: Statewide Independent Living Council (SILC)

5.1 Establishment of SILC

How the SILC is established and SILC autonomy is assured.

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.

Per the Executive Order, the SILC can meet up to six (6) 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 is currently considered a non-profit in Colorado and is finalizing IRS paperwork to become 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.

5.2 SILC Resource Plan

Resources (including necessary and sufficient funding, staff/administrative support, and in-kind), by funding source and amount, for SILC to fulfill all duties and authorities.ⁱⁱⁱ

Sources and amounts of funding – The CO SILC receives 30% of Part B funds, approximately \$101,615 each year. The DSE provides \$48,000 in I&E funds yearly. As the SILC finalizes becoming a 501 c 3, continued focus on resource development will occur. *These funding amounts are necessary and sufficient to ensure the capacity of the SILC to fulfill all the duties and selected authorities (section 705 (c) of the Act).*

Staff/administrative support – Currently, the SILC does not have staff or administrative support. There is currently money in the SILC Budget for an Executive Director and plans to contract with an Executive Director are currently occurring at the writing of the SPIL. The DSE provides some administrative support to the SILC. The SILC also benefits from volunteers and peer counselors in the operation of the yearly Youth Leadership Forum.

Process used to develop the Resource Plan.

For Part B Funds, an allocation committee, with reps from CILs, DSE and SILC determine the formula for distribution.

Process for disbursement of funds to facilitate effective operations of SILC.

The Resource Plan is dependent upon the SILC budget and the full SILC votes on the budget. Weekly meetings occur between the SILC and the DSE to discuss expenditures of the SILC. The DSE has committed resources to monitor expenses and disbursement of funds, while the SILC provides information and guidance, remaining fully autonomous. A monthly budget is reviewed with the SILC executive committee and the DSE to monitor Resource Plan and SILC Budget. The DSE does not include and requirements for the Resource Plan that may compromise the independence of the SILC. Any proposed expenditures outside of the budget must be approved by the SILC and the budget adjusted accordingly.

NOTE: Pursuant to 45 CFR 1329.15(c)(4), the DSE may not include any conditions or requirements in the SILC Resource Plan that may compromise the independence of the SILC.

5.3 Maintenance of SILC

How State will maintain the SILC over the course of the SPIL.^{iv}

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

Indicate who makes appointments to the SILC, how the State ensures that the SILC composition and qualification requirements are met, how the chair is selected, how term limits are maintained, and how SILC vacancies are filled.

Describe how the specific SILC staffing requirements listed in the SPIL Instrument will be addressed. Concisely describe or cite relevant written policies, procedures, by-laws, technical assistance and monitoring activities or other practices.

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.

SILC Membership Process:

- 1) Interested individual completes pre-application, which can be found on the CO SILC website.
- 2) DSE SILC liaison distributes pre-application to members of the SILC Membership Committee.
- 3) An interview is then coordinated with the DSE SILC liaison and the chair of the Membership Committee.
- 4) The Membership Committee interviews prospective applicant.
- 5) Membership Committee discusses applicant and makes recommendation for membership on the SILC.
- 6) Candidate is then invited to attend the next SILC meeting.
- 7) Membership committee recommends candidate for membership during the SILC meeting.
- 8) At that meeting, full SILC votes on candidate.
- 9) After SILC meeting, candidate completes the full Boards and Commission application.
- 10) Completed application is submitted to the SILC liaison from the Governor's Boards and Commission office.
- 11) SILC liaison drafts recommendation letter, routes through the Colorado Department of Labor and Employment for approval, then submits application to the Governor's Boards and Commission office.

- 12) Governor approval is given, both candidate and SILC liaison are notified.
- 13) New member now attends future SILC meetings.

Section 6: Legal Basis & Certifications

6.1 Designated State Entity (DSE)

The state entity/agency designated to receive and distribute funding, as directed by the SPIL, under Title VII, Part B of the Act is The Colorado Department of Labor and Employment, Division of Vocational Rehabilitation, Office of Independent Living Services.

Authorized representative of the DSE: Kristin Corish, Director, Division of Vocational Rehabilitation.

6.2 Statewide Independent Living Council (SILC)

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: **The Colorado Statewide Independent Living Council.**

Centers for Independent Living (CILs):

The Centers for Independent Living (CILs) eligible to sign the SPIL, a minimum of 51% whom must sign prior to submission, are:

- Atlantis Community
- Center for Independence
- Center for People with Disabilities
- Center Toward Self Reliance
- SW Center for Independence
- Connections for Independent Living
- The Independence Center
- Disabled Resources Center
- NW Colorado Center for Independence

6.4 Authorizations

6.4.a. The SILC is authorized to submit the SPIL to the Independent Living Administration, Administration for Community Living. **Yes** (Yes/No)

6.4.b. The SILC and CILs may legally carryout each provision of the SPIL. **Yes** (Yes/No)

6.4.c. State/DSE operation and administration of the program is authorized by the SPIL.

Yes (Yes/No)

Section 7: DSE Assurances

Kristin Corash, Director, Division of Vocational Rehabilitation acting on behalf of the DSE
Colorado Department of Labor and Employment/Division of Vocational Rehabilitation

located at 633 17th St, Suite 1501, Denver, CO 303-318-8568 _____ 45 CFR 1329.11
assures that:

- 7.1. The DSE acknowledges its role on behalf of the State, as the fiscal intermediary to receive, account for, and disburse funds received by the State to support Independent Living Services in the State based on the plan;
- 7.2. The DSE will assure that the agency keeps appropriate records, in accordance with federal and state law, and provides access to records by the federal funding agency upon request;
- 7.3. The DSE will not retain more than 5 percent of the funds received by the State for any fiscal year under Part B for administrative expenses;¹
- 7.4. The DSE assures that the SILC is established as an autonomous entity within the State as required in 45 CFR 1329.14;
- 7.5. The DSE will not interfere with the business or operations of the SILC that include but are not limited to:
 1. Expenditure of federal funds
 2. Meeting schedules and agendas
 3. SILC board business
 4. Voting actions of the SILC board
 5. Personnel actions
 6. Allowable travel
 7. Trainings
- 7.6. The DSE will abide by SILC determination of whether the SILC wants to utilize DSE staff:
 1. If the SILC informs the DSE that the SILC wants to utilize DSE staff, the DSE assures that management of such staff with regard to activities and functions performed for the SILC is the sole responsibility of the SILC in accordance with Sec. 705(e)(3) of the Act (Sec. 705(e)(3), 29 U.S.C.796d(e)(3)).
- 7.7. The DSE will fully cooperate with the SILC in the nomination and appointment process for the SILC in the State;
- 7.8. The DSE shall make timely and prompt payments to Part B funded SILCs and CILs:
 1. When the reimbursement method is used, the DSE must make a payment within 30 calendar days after receipt of the billing, unless the agency or pass-through entity reasonably believes the request to be improper;
 2. When necessary, the DSE will advance payments to Part B funded SILCs and CILs to cover its estimated disbursement needs for an initial period generally geared to the mutually agreed upon disbursing cycle; and
 3. The DSE will accept requests for advance payments and reimbursements at least monthly when electronic fund transfers are not used, and as often as necessary when electronic fund transfers are used, in accordance with the provisions of the Electronic Fund Transfer Act (15 U.S.C. 1693-1693r).

The signature below indicates this entity/agency's agreement to: serve as the DSE and fulfill all the responsibilities in Sec. 704(c) of the Act; affirm the State will comply with the

aforementioned assurances during the three-year period of this SPIL; and develop, with the SILC, and ensure that the SILC resource plan is necessary and sufficient (in compliance with section 8, indicator (6) below) for the SILC to fulfill its statutory duties and authorities under Sec. 705(c) of the Act, consistent with the approved SPIL.¹

Kristin Corash, Director, Division of Vocational Rehabilitation, Colorado Department of Labor and Employment

Name and Title of DSE director/authorized representative

Signature

Date

Electronic signature may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.

Section 8: Statewide Independent Living Council (SILC) Assurances and Indicators of Minimum Compliance

8.1 Assurances

Joan LaBelle, CO SILC Chair, acting on behalf of the CO SILC, located at _____ 633 17th Street, Suite 1501, Denver, CO 80202, joan.labelle@coloradosilc.org or j.labelle@disabledresourceservices.org, 45 CFR 1329.14 assures that:

- (1) The SILC regularly (not less than annually) provides the appointing authority recommendations for eligible appointments;
- (2) The SILC is composed of the requisite members set forth in the Act;¹
- (3) The SILC terms of appointment adhere to the Act;¹
- (4) The SILC is not established as an entity within a State agency in accordance with 45 CFR Sec. 1329.14(b);
- (5) The SILC will make the determination of whether it wants to utilize DSE staff to carry out the functions of the SILC;
 - a. The SILC must inform the DSE if it chooses to utilize DSE staff;
 - b. The SILC assumes management and responsibility of such staff with regard to activities and functions performed for the SILC in accordance with the Act.¹
- (6) The SILC shall ensure all program activities are accessible to people with disabilities;
- (7) The State Plan shall provide assurances that the designated State entity, any other agency, office, or entity of the State will not interfere with operations of the SILC, except as provided by law and regulation and;
- (8) The SILC actively consults with unserved and underserved populations in urban and rural areas that include, indigenous populations as appropriate for State Plan development as described in Sec. 713(b)(7) the Act regarding Authorized Uses of Funds.¹

Section 8.2 Indicators of Minimum Compliance

Indicators of minimum compliance for Statewide Independent Living Councils (SILC) as required by the Rehabilitation Act (Section 706(b), 29 U.S.C. Sec 796d-1(b)), as amended and supported

by 45 CFR 1329.14-1329.16; and Assurances for Designated State Entities (DSE) as permitted by Section 704(c)(4) of the Rehabilitation Act (29 U.S.C. Sec. 796c(c)(4)), as amended.

(a) STATEWIDE INDEPENDENT LIVING COUNCIL INDICATORS.

- (1) SILC written policies and procedures must include:
 - a. A method for recruiting members, reviewing applications, and regularly providing recommendations for eligible appointments to the appointing authority;
 - b. A method for identifying and resolving actual or potential disputes and conflicts of interest that are in compliance with State and federal law;
 - c. A process to hold public meetings and meet regularly as prescribed in 45 CFR 1329.15(a)(3);
 - d. A process and timelines for advance notice to the public of SILC meetings in compliance with State and federal law and 45 CFR 1329.15(a)(3);
 - e. A process and timeline for advance notice to the public for SILC “Executive Session” meetings, that are closed to the public, that follow applicable federal and State laws;
 - i. “Executive Session” meetings should be rare and only take place to discuss confidential SILC issues such as but not limited to staffing.
 - ii. Agendas for “Executive Session” meetings must be made available to the public, although personal identifiable information regarding SILC staff shall not be included;
 - f. A process and timelines for the public to request reasonable accommodations to participate during a public Council meeting;
 - g. A method for developing, seeking and incorporating public input into, monitoring, reviewing and evaluating implementation of the State Plan as required in 45 CFR 1329.17; and
 - h. A process to verify centers for independent living are eligible to sign the State Plan in compliance with 45 CFR 1329.17(d)(2)(iii).
- (2) The SILC maintains regular communication with the appointing authority to ensure efficiency and timeliness of the appointment process.
- (3) The SILC maintains individual training plans for members that adhere to the SILC Training and Technical Assistance Center’s SILC training curriculum.
- (4) The SILC receives public input into the development of the State Plan for Independent Living in accordance with 45 CFR 1329.17(f) ensuring:
 - a. Adequate documentation of the State Plan development process, including but not limited to, a written process setting forth how input will be gathered from the state’s centers for independent living and individuals with disabilities throughout the state, and the process for how the information collected is considered.
 - b. All meetings regarding State Plan development and review are open to the public and provides advance notice of such meetings in accordance with existing State and federal laws and 45 CFR 1329.17(f)(2)(i)-(ii);

- c. Meetings seeking public input regarding the State Plan provides advance notice of such meetings in accordance with existing State and federal laws, and 45 CFR 1329.17(f)(2)(i);
 - d. Public meeting locations, where public input is being taken, are accessible to all people with disabilities, including, but not limited to:
 - i. proximity to public transportation,
 - ii. physical accessibility, and
 - iii. effective communication and accommodations that include auxiliary aids and services, necessary to make the meeting accessible to all people with disabilities.
 - e. Materials available electronically must be 508 compliant and, upon request, available in alternative and accessible format including other commonly spoken languages.
- (5) The SILC monitors, reviews and evaluates the State Plan in accordance with 45 CFR 1329.15(a)(2) ensuring:
- a. Timely identification of revisions needed due to any material change in State law, state organization, policy or agency operations that affect the administration of the State Plan approved by the Administration for Community Living.
- (6) The SILC State Plan resource plan includes:
- a. Sufficient funds received from:
 - i. Title VII, Part B funds;
 - 1. If the resource plan includes Title VII, Part B funds, the State Plan provides justification of the percentage of Part B funds to be used if the percentage exceeds 30 percent of Title VII, Part B funds received by the State;
 - ii. Funds for innovation and expansion activities under Sec. 101(a)(18) of the Act, 29 U.S.C. Sec. 721(a)(18), as applicable;
 - iii. Other public and private sources.
 - b. The funds needed to support:
 - i. Staff/personnel;
 - ii. Operating expenses;
 - iii. Council compensation and expenses;
 - iv. Meeting expenses including meeting space, alternate formats, interpreters, and other accommodations;
 - v. Resources to attend and/or secure training and conferences for staff and council members and;
 - vi. Other costs as appropriate.

The signature below indicates the SILC's agreement to comply with the aforementioned assurances and indicators:

Joan LaBelle _____
 Name of SILC chairperson

Signature

Date

Electronic signature may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.

Section 9: Signatures

The signatures below are of the SILC chairperson and at least 51 percent of the directors of the centers for independent living listed in section 6.3. These signatures indicate that the CO SILC and the Centers for Independent Living in the state agree with and intend to fully implement this SPIL’s content. These signatures also indicate that this SPIL is complete and ready for submission to the Independent Living Administration, Administration for Community Living, U.S. Department of Health and Human Services.

The effective date of this SPIL is October 1, 2020

SIGNATURE OF SILC CHAIRPERSON DATE

Joan LaBelle
NAME OF SILC CHAIRPERSON

Center for Independence
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR DATE

Linda Taylor
NAME OF CIL DIRECTOR

Atlantis Community
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

Candie Burnham
SIGNATURE OF CIL DIRECTOR DATE

Maria Stepanyan
NAME OF CIL DIRECTOR

Center for People with Disabilities
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR DATE

Rochelle Mitchell-Miller
NAME OF CIL DIRECTOR

Connections for Independent Living
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR DATE

Bill Edwards
NAME OF CIL DIRECTOR

Center for Disabilities (dba Center Toward Self Reliance)
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR DATE

Ian Engle
NAME OF CIL DIRECTOR

Northwest CO Center for Independence
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR DATE

Martha Mason
NAME OF CIL DIRECTOR

Southwest Center for Independence
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR DATE

Joan LaBelle
NAME OF CIL DIRECTOR

Disabled Resource Services
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR DATE

Carrie Schillinger
NAME OF CIL DIRECTOR

The Independence Center
NAME OF CENTER FOR INDEPENDENT LIVING (CIL)

SIGNATURE OF CIL DIRECTOR

DATE

Electronic signatures may be used for the purposes of submission, but hard copy of signature must be kept on file by the SILC.

i Sec. 704(c).

ii 45 CFR 1329.17(g).

iii Sec. 704(b), sec. 705(e), 45 CFR 1329.12(b)(2) and 1329.15 (c)(1)-(6).

iv 45CFR 1329.14(a) & (b) and 1329.12(b)(2)