

State Plan for Independent Living (SPIL) for Colorado for 2017-2019

General Information

Designated Agency Identification

State: Colorado

Agency: Colorado Division of Vocational Rehabilitation

Plan for: 2017-2019

Submitted in fiscal year: 2016

View grant [90IS0064-01](#) in the Grant Award screen.

Part I: Assurances

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.

Colorado Department of Labor & Employment/Division of Vocational Rehabilitation/Office of IL

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.

N/A

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.

Colorado Statewide Independent Living Council

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 SPIL. Yes

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. Yes

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. Yes

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, Interim Director Division of Vocational Rehabilitation.

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;
- 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.

Yes

2.2 The DSU 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. Yes

2.3 The DSU 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;
- 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.

Yes

2.4 At the public meetings to develop the State plan, the DSU 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. Yes

2.5 The DSU 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. Yes

2.6 The DSU 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. Yes

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 Yes

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. Yes

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.

Yes

3.4 Participating service providers meet all applicable State licensure or certification requirements. Yes

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. Yes

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. Yes

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. Yes

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. Yes

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, 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.

Yes

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. Yes

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. Yes

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. Yes

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.

Yes

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. Yes

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. Yes

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). Yes

Section 9: Signatures

As the authorized signatories, we will sign, date and retain in the files of the state agency(ies) and the Statewide Independent Living Council the Part I: Assurances, 1-8, and the separate Certification of Lobbying forms ED-80-0013 (available in [MS Word](#) and [PDF](#) formats) for the state independent living program (Part B) and the centers for independent living program (Part C).

The effective date of this SPIL is October 1, 2016.

Section 9: Signature for SILC Chairperson

Name Joe Anzures

Title SILC Chair

Signed? Yes

Date signed 06/03/2016

Section 9: Signature for DSU Director

Name Steve Anton

Title Interim Director Division of Vocational Rehabilitation

Signed? Yes

Date signed 06/03/2016

Section 9: Signature for Separate State Agency for Individuals Who Are Blind

Is there a Separate State Agency for Individuals Who Are Blind? No

Name

Title

Signed? No

Date signed

Part II: Narrative: Section 1 - Goals, Objectives and Activities

Section 1: Goals, Objectives and Activities

1.1 Goals and Mission

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.

Goal Name:Improve SILC effectiveness

Goal Description:

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.

Goal Name:Increase SILC member knowledge base

Goal Description:

Increase the knowledge base of SILC members on IL Philosophy, history, barriers, and challenges, funding sources, and avenues of change.

Goal Name:Increase the capacity of the CILs

Goal Description:

Increase the capacity of the Centers for Independent Living to provide more services to more consumers through funding development, training, outreach, and partnerships

1.2 Objectives

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

Goal(s) from Section 1.1	Objective to be achieved	Time frame start date	Time frame end date
Improve SILC effectiveness	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.	07/01/2017	09/30/2018
Improve SILC effectiveness	Complete assessments (i.e., Snap-Shot, SWOT) to determine SILC needs. Through the mail and at meetings.	10/01/2016	04/01/2017
Improve SILC effectiveness	<p>Conduct strategic planning to include:</p> <ul style="list-style-type: none"> · Long-range operational goals & objectives · Outcome measures · Evaluation · Staffing · Responsibilities · Increasing membership 	06/01/2016	09/30/2017

	<ul style="list-style-type: none"> · Technology (video conferencing) <p>* Website and other digital accessibility</p>		
Improve SILC effectiveness	<p>Develop an overall resource plan/fundraising plan in line with state regulations and WIOA, to address:</p> <ul style="list-style-type: none"> · Structural options like incorporation as a 501(c)3 · Whether there is a possibility of contracting with DVR as a non-for-profit · Joining the Colorado Alliance for Independent Living (CAIL) to collaborate on projects · Unrestricted funds for food at meetings <p>Fundraising</p>	06/01/2016	07/01/2017
Improve SILC effectiveness	<p>The SILC will develop immediate plans for:</p> <ul style="list-style-type: none"> · Up to 6 meetings per year, in rotation around the state · A local meet & greet the evening before each SILC meeting · Meetings focused on action as well as reports <p>Including Centers in SILC meetings</p>	06/01/2016	10/31/2016
Improve SILC effectiveness	<p>The SILC will develop a master calendar that includes:</p> <ul style="list-style-type: none"> · Goals on this SPIL · Tracking current SPIL goals · Timeline for the next SPIL 	10/01/2016	09/30/2018

	<ul style="list-style-type: none"> · New Survey · Retreats · Membership terms · Trainings · Committee meetings <p>Events</p>		
Increase SILC member knowledge base	Complete training needs-assessment, through the mail and at meetings.	10/01/2017	04/01/2017
Increase SILC member knowledge base	<p>Develop an annual training plan that includes content & materials. We will address:</p> <ul style="list-style-type: none"> · Boards & Commissions Training · Initial orientation and onboarding (3 months) · Responsibilities · Acronyms · Visiting the IL Centers · Regular State & WIOA regulation training · Staffing · Using ILRU & APRIL · Smooth as SILC · Operations Manual · Involving CIL staff & directors · Regular in-person training · User training on technology · Training needs of the overall IL community 	10/01/2016	10/01/2017

	Annual training of the SILC by the IL Cross-Training Group		
Increase the capacity of the CILs	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.	10/01/2016	09/30/2019
Increase the capacity of the CILs	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.	10/01/2016	10/01/2018
Increase the capacity of the CILs	The SILC Public Policy Committee will collect & develop fact sheets, educational issue briefs and resource instructions for Centers to use when issues arise. Collect from The IC, CCDC, The Arc, etc.	10/01/2016	09/30/2019

1.2 Objectives

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.

- Identify the populations to be designated for targeted outreach efforts

Deaf & Hard of Hearing, Youth, Nursing home residents, Rural areas, Native & Minority, ESL, Mental Illness

- Identify the geographic areas (i.e., communities) in which the targeted populations reside

Rural/Frontier Counties below, Statewide Jackson Clear Creek Sedgwick Yuma Kit Carson Rio Blanco Morgan Phillips Alamosa Cheyenne Eagle Logan Washington Costilla Kiowa Pitkin San Juan Rio Grande Huerfano Crowley Gunnison Ouray Saguache Las Animas Bent San Miguel Hinsdale Custer Elbert Prowers Dolores Mineral Conejos Lincoln Chaffee Lake Park Gilpin

- Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed

Population & Geo. Area	Addressing Needs	Cost
<p>Deaf/HOH</p> <p>Statewide</p>	<p>Goal: Increase the number of Deaf/HOH consumers being served per CIL, by compiling and implementing best practices to promote culturally & linguistically language competent services</p> <p>Within the SPIL period we will:</p> <ol style="list-style-type: none"> 1. Revisit information that was assembled through a \$10,000.00 grant from the Colorado Commission for Deaf/HOH in 2011. 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). 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. 4. Disseminate results of research and best practices to all Centers and/or place on SILC website. <p>Outcome: 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.</p> <p>The goal is important to us and we want to work toward it if we can find the resources.</p>
<p>Youth</p> <p>Statewide</p>	<p>Goal: 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"> 1) SILC Youth Committee will research nationwide best practices for youth transition & youth IL services & summarize their findings in a white paper. If needed, a statewide plan to improve youth programs and services will be developed. 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 volunteers for the SILC and attend statewide and national meetings and conferences representing Colorado youth with significant disabilities. 	<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 & 1 national conference , plus \$10,000 for a 2 day forum, travel for 20-40 youth to Denver (split with CILs), & meeting space. We have only \$14,250</p>

Population & Geo. Area	Addressing Needs	Cost
	<p>3) Conduct a statewide IL Youth Leadership Forum beginning in FY-18 and, if successful, continue it annually thereafter.</p> <p>Outcome: Youth with disabilities have increased capacity to advocate on their own behalf and become our future leaders.</p>	<p>budgeted, so it is important to find more funding.</p>
<p>Rural - 47 of Colorado's 64 counties are designated as rural or frontier by the US census. This SPIL is focused on both (1) areas where people must travel more than ½ hour by car to reach services, and (2) the counties on the map on page 27 of this document that show 10 or fewer people receiving IL services.</p>	<p>Goal: 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"> 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. 2. Look specifically at systems advocacy and barrier removal. 3. Assemble a best practices document based on research findings. <p>Outcome: 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>
<p>Nursing Homes</p> <p>Statewide</p>	<p>Goal: 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"> 1. Advocate for increased affordable integrated accessible housing for people who want to live in the community. 2. Advocate for Universal Design and Visitability in all construction 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 	<p>\$50/month for video conference calls</p> <p>(\$600/year)</p>

Population & Geo. Area	Addressing Needs	Cost
	<p>4. Support people who have goals to maintain family integrity</p> <p>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.</p> <p>6. Compare the statewide successful transition numbers at the beginning and end of this SPIL cycle.</p> <p>Outcome: People with disabilities live in the community</p>	
<p>Native & Minority, ESL, Mental Illness</p> <p>Statewide</p>	<p>Goal: Gather research data on Native & Minority, ESL and Psychiatric Illness to assist with goal planning process for upcoming SPIL</p> <p>1. SPIL Committee will gather data as a function of gathering needs assessment information.</p> <p>2. SPIL Committee to include these steps as a part of preparing for the 2019-2021 SPIL</p> <p>3. CILs will continue to do outreach, and seek and compare best practices while working with these groups</p> <p>Outcome: The next SPIL cycle has goals in these areas</p>	<p>Conference calls only – no additional expense.</p> <p>Direct Support Meetings at CILs' expense</p>

1.3 Financial Plan

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.

Year 1 - 2017 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	78891		211191	
Title VII Funds Chapter 1, Part C			1042727	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	48000			
Other Federal funds - other				
Non-Federal funds - State funds			6831645	
Non-Federal funds - Other				
Total	126891	0	8085563	0

Year 2 - 2018 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	91605		198478	
Title VII Funds Chapter 1, Part C			1042727	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	48000			
Other Federal funds - other				

Non-Federal funds - State funds			6831645	
Non-Federal funds - Other				
Total	139605	0	8072850	0

Year 3 - 2019 Approximate funding amounts and uses

Sources	SILC resource plan	IL services	General CIL operations	Other SPIL activities
Title VII Funds				
Title VII Funds Chapter 1, Part B	91605		198478	
Title VII Funds Chapter 1, Part C			1042727	
Title VII Funds Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
Other Federal funds - Sec. 101(a)(18) of the Act (Innovation and Expansion)	48000			
Other Federal funds - other				
Non-Federal funds - State funds			6831645	
Non-Federal funds - Other				
Total	139605	0	8072850	0

1.3B Financial Plan Narratives

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

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.

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
 - o Atlantis

- Tier 2: 6.39% of available Part B funds

- o Center for Independence

- o Center for People with Disabilities

- Tier 3: 10.39% of available Part B funds

- o The Independence Center

- Tier 4: 13.39% of available Part B funds

- o Center for Disabilities

- o Connections for Independence

- Tier 5: 15.39% of available Part B funds

- o Disabled Resource Services

- o Northwest Colorado Center for Independence

- o 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 Office of Independent Living provides in-kind services and consultation about allowable expenses and accounts payable. Until we get a SILC Coordinator, that office also provides organization of meetings around the state, and secretarial duties.

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

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

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.

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.
 - Department of Health and Human Services
 - Department of Education Transition Services
 - State Coordinating Council on Transportation
 - High School Transition Programs; the School-to-Work Alliance Program; State Youth Council
 - Colorado Commission for the Deaf and Hard of Hearing
 - El Grupo Vida, ethnic chambers of commerce (Native American, Hispanic, African American, Pacific Islanders), the 121 Program
 - 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

1.6 Coordination of Services

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, 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

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.

Part II: Narrative: Section 2 - Scope, Extent, and Arrangements of Services

2.1 Scope and Extent

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	Provided by the DSU (directly)	Provided by the DSU (through contract and/or grant)	Provided by the CILs (Not through DSU contracts/grants)
Core Independent Living Services - Information and referral	No	Yes	Yes
Core Independent Living Services - IL skills training	No	Yes	Yes
Core Independent Living Services - Peer counseling	No	Yes	Yes
Core Independent Living Services - Individual and systems advocacy	No	Yes	Yes
Counseling services, including psychological, psychotherapeutic, and related services	No	Yes	Yes
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)	No	Yes	No
Rehabilitation technology	Yes	No	No
Mobility training	No	Yes	Yes
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services	No	Yes	Yes

Personal assistance services, including attendant care and the training of personnel providing such services	No	Yes	Yes
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services	No	Yes	Yes
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	No	Yes	Yes
Education and training necessary for living in the community and participating in community activities	No	Yes	Yes
Supported living	No	Yes	Yes
Transportation, including referral and assistance for such transportation	No	Yes	Yes
Physical rehabilitation	No	Yes	Yes
Therapeutic treatment	No	Yes	Yes
Provision of needed prostheses and other appliances and devices	No	Yes	Yes
Individual and group social and recreational services	No	Yes	Yes
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	No	Yes	Yes
Services for children with significant disabilities	No	Yes	Yes
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	No	Yes	Yes

Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future	No	Yes	Yes
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities	No	Yes	Yes
Other necessary services not inconsistent with the Act	No	Yes	Yes

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.

- 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.

2.2 Arrangements for State-Provided Services

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.

Part II: Narrative: Section 3 - Design for the Statewide Network of Centers

3.1 Existing Network

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.

CENTER	PART B	Part C
Atlantis Community, Inc., Denver	1) Adams (share w/ CPWD) 2) Arapahoe 3) Denver 4) Douglas 5) Jefferson (share w/ CPWD)	1) Adams 2) Arapahoe 3) Denver 4) Douglas 5) Jefferson 6) Elbert
Center for Disabilities, Pueblo SPIL Signatory	1) Alamosa 2) Baca 3) Bent 4) Conejos 5) Costilla 6) Crowley	1) Baca 2) Bent 3) Crowley 4) Custer 5) Fremont 6) Huerfano

CENTER	PART B	Part C
	<ul style="list-style-type: none"> 7) Custer 8) Fremont 9) Huerfano 10) Kiowa 11) Las Animas 12) Mineral 13) Otero 14) Pueblo 15) Prowers 16) Rio Grande 17) Saguache 	<ul style="list-style-type: none"> 7) Kiowa 8) Las Animas 9) Otero 10) Prowers 11) Pueblo
<p>Center for Independence, Grand Junction SPIL Signatory</p>	<ul style="list-style-type: none"> 1) Delta 2) Chaffee 3) Eagle 4) Garfield 5) Gunnison 6) Hinsdale 7) Lake 8) Mesa 9) Montrose 10) Ouray 	<ul style="list-style-type: none"> 1) Delta 2) Eagle 3) Garfield 4) Grand 5) Gunnison 6) Hinsdale 7) Lake 8) Mesa 9) Montrose 10) Ouray

CENTER	PART B	Part C
	11) Pitkin 12) San Miguel	11) Pitkin 12) San Miguel
Center for People with Disabilities, Boulder SPIL Signatory	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 SPIL Signatory	1) Cheyenne 2) El Paso 3) Kit Carson 4) Lincoln 5) Park 6) Teller	n/a
Disabled Resource Services, Fort Collins SPIL Signatory	1) Jackson 2) Larimer	n/a

CENTER	PART B	Part C
Northwest CO Center for Independence, Steamboat SPIL Signatory	1) Grand 2) Moffat 3) Rio Blanco 4) Routt 5) Summit	n/a
Southwest Center for Independence, Durango SPIL Signatory	1) Archuleta 2) Dolores 3) La Plata 4) Montezuma 5) San Juan	n/a

3.2 Expansion of Network

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).

The table below is of counties where 10 or less people were served 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.

Jackson	Clear Creek	Sedgwick	Yuma	Kit Carson
Rio Blanco	Morgan	Phillips	Alamosa	Cheyenne
Eagle	Logan	Washington	Costilla	Kiowa
Pitkin	San Juan	Rio Grande	Huerfano	Crowley
Gunnison	Ouray	Saguache	Las Animas	Bent

San Miguel	Hinsdale	Custer	Elbert	Prowers
Dolores	Mineral	Conejos	Lincoln	Chaffee
Lake	Park	Gilpin		

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. They determined that a rural CIL would have an average cost of \$227,991. When adjusted for inflation in 2016 that would be \$324,485 (source of inflation calculator: data.bls.gov); an urban CIL's annual cost would average \$272,231. When adjusted for inflation in 2016 that would be \$387,449.

It is expected that any start-up CIL, whether it is established by federal or state funds, would require similar funding levels to provide services as required under Title VII, Part C. In Colorado we found, and the State Legislature has agreed, that each CIL needs a \$600,000 base in order to provide quality services throughout our large rural and frontier catchment areas.

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. Four of the nine Colorado Centers receive only Part B and State funding. 39 of the 64 counties do not receive Part C funding.

Frontier		Rural		Urban
Bent	Mineral	Alamosa	Larimer	
Cheyenne	Moffat	Archuleta	Logan	
Costilla	Rio Blanco	Broomfield	Montezuma	
Dolores	Saguache	Chaffee	Park	
Jackson	San Juan	Conejos	Phillips	
Kit Carson	Sedgewick	El Paso	Rio Grande	
Lincoln		Gilpin	Routt	
		Grand	Summit	
		La Plata	Teller	

The Center for Disabilities, out of Pueblo, serves the most counties and many of the most rural counties. That area and the Part B-only Centers should be given preference for any new Part C funding. During the course of this three-year plan, the SILC, the CILs, the DSE, and community stakeholders will review and identify unserved areas to designate where one new Part C Center with adequate funding should be located.

In the interim, 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

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

Part II: Narrative: Section 4 - Designated State Unit (DSU)

4.1 Administrative Support Services

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.

As of 07/01/16 the DSE employs a 1.0 FTE to serve as the state's IL Program Coordinator. The ILPC attends all SILC meetings and provides technical assistance on allowable expenses. The new IL Program Manager at the DSE will provide oversight of the SILC's contract. The Colorado Office of Independent Living (COIL) will work within the network of Centers to provide monitoring, oversight, and technical assistance. The COIL promotes collaboration between the Centers, the SILC, and the DSE. One of our goals noted above is to determine a structure for the SILC that can include fundraising to contract with or hire an independent conflict-free SILC Coordinator.

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

N/A

Part II: Narrative: Section 5 - Statewide Independent Living Council (SILC)

5.1 Resource plan

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 more information click the icon.

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.

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

- Non-inclusion of conditions or requirements in the SILC resource plan that may compromise the independence of the SILC.

The SILC remains very aware of and safeguards its independence. Nothing in the resource plan jeopardizes its autonomy.

- Reliance, to the maximum extent possible, on the use of resources in existence during the period of implementation of the State plan.

Furthermore, the resource plan reflects prudent planning for operational needs, while taking into account full use of available resources

5.2 Establishment and Placement

Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies. Refer to the SPIL Instructions for more information about completing this section.

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

Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b). Refer to the SPIL Instructions for more information about completing this section.

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

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.

Part II: Narrative: Section 6 - Service Provider Requirements

Describe how the following service provider requirements will be met:

6.1 Staffing

- 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

- 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

- 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

- 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

- 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

- 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

- 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.

Part II: Narrative: 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.

Section 7: Evaluation

Goal(s) and the related Objective(s) from Section 1	Method that will be used to evaluate
Improve SILC effectiveness Increase SILC member knowledge base Increase the capacity of the CILs	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.

Part II: Narrative: Section 8 - State-Imposed Requirements

8 State-Imposed Requirements

Identify any State-imposed requirements contained in the provisions of this SPIL.

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