

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

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

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

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

**FISCAL YEARS 2008 - 2010**

**Effective Date: October 1, 2007**

## **TABLE OF CONTENTS**

### Part I: Assurances

- Section 1 Legal Basis and Certifications
- Section 2 SPIL Development
- Section 3: Independent Living Services
- Section 4: Eligibility
- Section 5: Staffing
- Section 6: Fiscal Control and Fund Accounting
- Section 7: Record-Keeping, Access and Reporting
- Section 8: Protection, Use and Release of Personal Information
- Section 9: Signatures

### Part II: Narrative

- Section 1: Goals, Objectives and Activities
- Section 2: Scope, Extent and Arrangements of Services
- Section 3: Design for the Statewide Network of Centers
- Section 4: Designated State Unit (DSU)
- Section 5: Statewide Independent Living Council (SILC)
- Section 6: Service Provider Requirements
- Section 7: Evaluation
- Section 8: State-Imposed Requirements (If applicable)

## PART I: Assurances

State of: Colorado

### Section 1: Legal Basis and Certifications

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

### Section 2: SPIL Development

- 2.1 The plan shall be reviewed and revised not less than once every three years, to ensure the existence of appropriate planning, financial support and coordination, and other assistance to appropriately address, on a statewide and comprehensive basis, the needs in the State for:

- (A) The provision of State independent living services;
- (B) The development and support of a statewide network of centers for independent living; and
- (C) Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities. *34 CFR 364.20(f)*

2.2 The 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. *34 CFR 20(g)(1)*

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:

- i. Appropriate and sufficient notice of the public meetings (that is, at least 30 days prior to the public meeting through various media available to the general public, such as newspapers and public service announcements, and through specific contacts with appropriate constituency groups and organizations identified by the DSU and SILC);
- ii. 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
- iii. Public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication. *34 CFR 364.20(g)(2)*

2.4 At the public meetings to develop the State plan, the 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. *34 CFR 364.20(h)*

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. *34 CFR 364.28*

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. *34 CFR 364.20(e)*

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

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

### **Section 4: Eligibility**

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

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

- 5.1 Service provider staff includes personnel who are specialists in the development and provision of IL services and in the development and support of centers. *34 CFR 364.23(a)*
- 5.2 To the maximum extent feasible, a service provider makes available personnel able to communicate:

(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 who apply for or receive IL services under title VII of the Act 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. *34 CFR 364.23(b)*

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

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

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

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

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

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

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

7.2 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 with respect to the records that are required by *34 CFR 364.35* and *.36*

7.3 All recipients of financial assistance under parts B and C of chapter 1 and chapter 2 of title VII of the Act will provide access to the Commissioner and the Comptroller General, or any of their duly authorized representatives, to the records listed in 34 CFR 364.37 for the purpose of conducting audits, examinations and compliance reviews. *34 CFR 364.37*

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

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

**Section 9: Signatures**

After having carefully reviewed all of the assurance in sections 1 – 8 of this SPIL, the undersigned hereby affirm that the State of Colorado is in compliance and will remain in compliance with the aforementioned assurances during the three-year period of this SPIL.

The effective date of this SPIL is:

---

SIGNATURE OF SILC CHAIRPERSON	DATE
-------------------------------	------

**Terrance Turner**  
NAME OF SILC CHAIRPERSON

---

SIGNATURE OF DSU DIRECTOR	DATE
---------------------------	------

**Nancy Smith, Director, Division of Vocational Rehabilitation**  
NAME AND TITLE OF DSU DIRECTOR

---

SIGNATURE OF DIRECTOR OF THE SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND	DATE
----------------------------------------------------------------------------------	------

NA  
NAME AND TITLE OF THE DIRECTOR OF THE SEPARATE STATE AGENCY FOR INDIVIDUALS WHO ARE BLIND

## **Part II: Narrative**

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

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

1.1A 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.

**The CILs and the SILC work together to fulfill the SILC's mission which is, "To use the collective power and legal mandate of the independent living movement to develop and secure public policies that ensure civil rights and expand options for all persons with disabilities in every aspect of life." To that end, the goals and objectives of this SPIL will continue to expand options for people with disabilities in Colorado. The four goals are:**

- 1. Creating an infrastructure to support the activities of the SILC.**
- 2. Educating public policy makers and others about disability issues**
- 3. Setting up opportunities for community organizing and community participation**
- 4. Supporting the state independent living center system.**

**These goals were developed in collaboration with the Association of Colorado Centers for Independent living, and reflect their objectives as well as those of the SILC. In addition to the four core services, our collaborative identified key service issues affecting consumers in Colorado. The four goals listed above were established to further identify, define, and address these significant issues. By doing so, it is our hope to increase services in the identified areas. The list, ranked by priorities determined by the ACCIL:**

**Based on current (2007) needs -**

- Housing – the lack of affordable, accessible, integrated housing impacts nursing home transition and community integration.**
- Transportation – much of Colorado is rural; the lack of accessible public transportation creates a substantial barrier for rural consumers.**
- Employment- as government assistance diminishes or remains static, the cost of living (especially housing) increases significantly. CILs are taking a more active role in employment opportunities for people with disabilities in support of more complete community integration.**
- Quality Attendant Care (personal assistance) – in addition to improving attendant care, CILs are advocating for more consumer-directed attendant services.**
- Immigration (people are required to go in person for papers and this can be difficult for a person with a severe disability)**
- Lack of disability support services/Lack of awareness of ADA requirements in rural areas of the state**



- **Youth Transition - CILs need to reach youth while they are still in school so that an independent living plan can be part of the transition process.**
- **Client Assistance Program's weak advocacy role for consumers of ILCs/lack of deaf services in ILCs**
- **Election reform that does not take away newly acquired voting access**
- **Changing the attitudes of staff at the Single Entry Points (SEP)**
- **Cultural Competency (need a good basic definition and strategies for CILs to become culturally competent)**
- Emergency Preparedness for people with disabilities (What do the counties have in their Emergency Preparedness plans for helping people with disabilities?)
- Assistive Technology services at CILs (new requirement on 704 reports)

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

**Goal 1: Creating an infrastructure to support the SILC**

1. The SILC will define, negotiate and implement its autonomy from the DVR (its designated state unit). Specific issues include budgeting and fundraising, disbursing funds and purchasing services and equipment, hiring, supervising and terminating staff, the SILC's advocacy role and its ability to speak directly to the Governor and other state policy makers.  
(Year 1 and 2)
  - The SILC will direct SILC Coordinator to research other SILCs and present different models at a SILC retreat addressing the four issues above and any others.
  - After a decision has been made, a white paper will be written to detail the proposed implementation to be approved by vote of the SILC and a meeting will be held to negotiate with the director of DVR.
  - SILC members and the SILC Coordinator will then implement the agreement.

*Success Indicators:*

- *Research on various options for SILC structure and produce white paper*
- *Hold a retreat for SILC members*
- *Develop a Memorandum of Understand between the SILC and the DSU on how the relationship will continue*

*Outcomes:*

- *Discussion about 501 c 3 status will be finished*
- *Relationship with DSU will improve.*

2. The SILC will have contact with the Colorado disability community in order to better understand its needs. (Annually)
  - Hold meetings around the state so that members gain an understanding of the

issues affecting that region and consumers have an opportunity to speak to the SILC.

- SILC members will visit CILs in the area of the meeting, when possible.
- Create processes for holding public hearings and disseminating materials as needed through out the three year period. (*Year 1 for process*)
- Distribute notices of meetings and minutes as appropriate (specifics in SILC Operating Manual)

*Success Indicators:*

- *Schedule of SILC meetings will reflect travel to communities where there is a CIL and provide time for SILC members to visit the Center.*
- *SILC agenda will include a public comment period in every agenda*
- *Agendas will be posted on the SILC website*
- *SILC Policies and Procedures will detail how agendas, minutes and other communication will be disseminated widely.*

*Outcomes:*

- *Better understanding by SILC members of the community that each CIL serves*
- *Improved relationship between SILC and each CIL*
- *Coloradoans with disabilities will be better able to communicate with the SILC and find out about the business of the SILC at any given time.*

3. The SILC values understanding and being a part of the national disability conversation.
  - Each year the Resource Development committee will budget for at least 2 SILC members to travel to the SILC Congress.
  - If funds are available the SILC will consider sending representatives to the NCIL and APRIL conferences.

*Success Indicators:*

- *SILC budget will show funds that will be spent to send SILC members to the SILC Congress and other conferences*
- *SILC agenda will reflect presentations from Conference attendees so that SILC members can learn more about the national agenda*

*Outcomes:*

- *SILC members are kept abreast of new developments in the field*
  - *Individual members who go to conferences receive more information to use in a leadership position*
4. Revamp committees to reflect the goals of the SILC and review at least yearly. (*to be implemented in Year 1 with annual review thereafter*)
    - All committees shall have a written description of purpose and goals and shall make reports on activities to the SILC as needed
      - State Plan Committee shall oversee the writing of the SPIL and monitor its implementation.
      - Membership committee will create and implement a process to recruit,

- interview and recommend new members for Governor’s consideration.
- Public Policy committee will recommend 2 to 3 issues a year for the SILC to learn about, provide or arrange for a briefing on the issue and invite appropriate state public policy makers to present on the issue at SILC meeting. Committee will write or oversee the writing of policy briefs on the subject that will be shared with consumers, CILS and other disability organizations.

*Success Indicators:*

- *Regular meetings are held by the State Plan committee to review the SPIL*
- *Reports to the SILC are reflected on the SILC agenda and in the minutes.*
- *A Public Policy committee is set up with members*
- *In the first year there will be one public policy issue brief and meeting as reflected in the SILC agenda and minutes.*

*Outcomes:*

- *SILC members will have a better understanding of the SPIL and the ongoing activities*
- *SILC staff will be able to manage the activities of the SPIL with oversight from the State plan committee*
- *The SILC will have been involved in at least one education/advocacy issue impacting people with disabilities*
- *A state program will better serve its consumers with disabilities as a result of meeting with the SILC.*

5. Update by-laws to reflect changes in the way the SILC operates (*1<sup>st</sup> Update in year 1 and then every other year as needed*)
  - *Appoint ad hoc committee to update bylaws as needed.*

*Success Indicators:*

- *Ad Hoc committee created and meetings held (minutes)*
- *Updated bylaws voted on before the end of the first year*

*Outcome*

- *SILC operates more efficiently within the rules established by the updated by-laws.*
6. Investigate various means of electronic communication and implement a system for disseminating information, delivering training and working on projects more effectively and efficiently.
    - *SILC website (Year 1)*
    - *Virtual Conference room (Year 2)*
    - *Web casts (Year 3)*

*Success Indicators:*

- *Having a website up and running by the end of the first year*
- *Making a decision about if and how to use a virtual conference room by the end of the second year.*
- *Deciding as to whether or not web casts would be beneficial by the end of the third year.*

*If so, provide one web cast in that year.*

*Outcome:*

- *SILC uses more up to date and accessible technology to communicate with others.*

7. Provide training to SILC members on the role and responsibilities of the SILC, IL history and philosophy, issues

facing the CILs and issues facing Coloradoans with disabilities. *(Annually)*

- Membership committee to oversee orientation of new members.

*Success Indicators:*

- *SILC Agenda will show when training was provided and by whom on what topic.*
- *90% of SILC members will have received the training*

*Outcome:*

- *SILC members who understand their role, the SILC's role, CIL's role and have knowledge of disability issues that are "hot" in Colorado*

**Goal 2: Educating Public Policy Makers and others about disability issues. (Advocacy/Public Policy)**

The SILC has the ability to invite public policy makers to come and talk with SILC members and the disability community about disability policy issues.

1. Add non voting representatives from state agencies that serve individuals with disabilities. *(Annually)*
  - SILC will recruit a representative from State agencies such as Colorado Department of Education (Special Education), AT Partners-the State Tech Act program, Division of Mental Health, HCPF, Division of Housing, Transportation, and the State Emergency Preparedness Program to join the SILC as non voting members.

*Success Indicators:*

- *The SILC membership roster will show at least 2 new state agency representatives as non voting members by the end of the first year*

*Outcome:*

- *New agency reps will be able to improve their programs ability to serve persons with disabilities.*

2. Using the list of issues generated by the CIL directors in January 2007 (which shall be updated annually), and additional issues identified during public hearings, the SILC will pick 2 issues each year about which to educate public policy makers. (See end of document for 2007 list) *(Begins Year 1 with 1 issue while setting up the committee, review process and policy brief template)*

- The Public Policy Committee will oversee the production of a policy brief for each of the issues it works on. This will be produced by a policy analyst/writer will detail the problem, the goal to be obtained and possibly offer solutions. The SILC will develop and implement an approval process

for distribution of the policy briefs.

- These briefs will be distributed prior to the meeting through the SILC website, CIL and DVR channels. It is important that consumers have access to these briefs.
- The SILC will receive a written brief and orientation on the issue and the agency that impacts that issue prior to the meeting with that agency executive.
- At the full SILC meeting, which is open to the public, the agency policy maker involved in the issue will be invited to discuss it. These meetings will be publicized so that CIL staff and consumers and other disability advocates can participate.
- The goal of the meeting will be to educate the policy maker about the impacts of the program, policy or legislation on people with disabilities.

*Success Indicators:*

- *A policy brief (issue brief) will be developed and circulated the first year (years 2 and 3 will have 2 briefs) on a topic to be selected from the list at the end of this document.*
- *The SILC agenda will reflect time for training SILC members on the issue and a meeting with the state public policy person who can impact the issue.*
- *Community members will be present at the meeting where the training and presentation will occur*

*Outcomes:*

- *Better educated SILC members and members of the disability community*
- *Public policy makers will receive a written document detailing the issue and possible solutions*
- *Public policy makers and/or program staff will create better services for people with disabilities based on the mutual discussions.*

3. Develop and implement a process to provide input to the Governor and Legislators on the impact of policies and programs on people with disabilities. *(Year 1)*
  - Once this process has been agreed upon and implemented, it will be the role of the Public Policy Committee to organize the training, invite the speaker and oversee the writing of the policy brief.
  - This committee will also be responsible for researching and recommending policy positions for the SILC to vote on and writing the advocacy/education letter communicating that position to appropriate policy makers.

*Success Indicators:*

- *Written Policy and Procedure on how to formally provide input to Governor and Legislators*
- *At least one formal communication to policy makers will be sent each year.*

*Outcome*

- *Governor and Legislators will have input on how their decisions might impact Coloradans with disabilities and make better decisions.*

4. Advocate, with the Governor, State Legislators and Community Leaders for the

Department of Education to strongly encourage local school districts to collaborate with local centers to allow access to students with disabilities, particularly students receiving services under Section 504.

*(Begin in Year 2)*

*Success Indicators:*

- *Meeting with State Department of Education to talk about how to allow CILs to access students with disabilities.*
- *All CILs have access to students with disabilities before they leave high school.*

*Outcome:*

- *High School students with disabilities (both those in special ed and mainstreamed) will have an opportunity to meet their CIL staff and learn about programs to help them transition more successfully.*

### **Goal 3: Community Organizing/Community Participation**

The SILC cannot accomplish very much alone - it is a part of a dynamic Colorado advocacy community. It can help connect that community through a community organizing approach. Such an approach, using the CILS and electronic technology, can encourage and support community participation.

1. Network with and support the work of NCIL and APRIL on the national level through memberships, attending conferences and disseminating their materials to CILS and SILC members. *(Annually)*

*Success Measures:*

- *SILC members will receive information from national associations on a regular basis via email and reports from members traveling to conferences*

*Outcome:*

- *Level of awareness of national issues will increase among SILC members and CIL staff.*
- 2. Develop, implement and set aside funds to support a policy that describes the criteria for SILC funding of travel for training for SILC members and others working in CILs. *(Year 1)*
  - Executive committee will draft policy to be voted on by full SILC
  - Resource Development Committee will budget funds for this purpose

*Success Indicators:*

- *Research what is allowed and write a policy on the criteria and process that the SILC will use to decide on funding travel and training for SILC members and CIL staff*
- *Set aside funding in annual budget for such requests*

*Outcomes:*

- *Quicker decisions around funding travel for training*
- *Spending down the SILC budget in an effective and efficient manner*
- *More SILC members and CIL staff receive training*

- SILC will disseminate information about the availability of funds each year along with the application process. This information will be available on the SILC website.

*Success Indicators:*

- *Once policy and process is in place at least two announcements of availability of funding (if available) will be sent to SILC members and CIL staff*
- *Notice will be posted on web site*

*Outcomes:*

- *More SILC members and CIL staff will be able to apply for funds to travel for training*
- *Knowledge of field issues will increase among SILC members and CIL staff*

3. Develop a statewide systems change network.

- SILC will work with the ACCIL to develop opportunities for centers to obtain training on community organizing around issues affecting people with disabilities. These systems change efforts will be organized around the issues identified in *Section 1.1*, but may also address rising issues locally, statewide, and nationally that are relevant to full community integration of people with disabilities. *(Annually)*
- Provide a link on the web site to Centers that have started organizing consumers in their catchment areas. Position papers, community organization project reports and training materials will be posted on the SILC website. *(Year 1 and ongoing)*
- In their meetings around the state, SILC will encourage local attendees to become part of the local Center's community organizing efforts. *(As soon as participating CILs are ready)*

*Success Indicators-by the end of the three year SPIL*

- *At least three CILs will have joined together to create a systems change network in Colorado*
- *At least three training sessions for systems change activities will be provided*
- *The participating centers will have an agreed upon advocacy agenda with activities and outcomes*
- *Consumers will be testifying at hearings locally and at the State Legislature*

*Outcomes:*

- *A model for cooperative systems change activities will be in place to encourage the other 7 CILs in Colorado to participate*
- *Consumers and policy makers will better understand the issues and potential solutions because of training from the participating CILs and the issue briefs provided by the network.*
- *Access and integration for Coloradoans with disabilities will improve in the three communities of the participating CILs.*

4. Youth Leadership Development.

- As an APRIL member, SILC will obtain youth leadership development materials.

*(Year 1 and on going)*

- SILC will start a Youth Leadership Development committee to explore how to best utilize the materials from APRIL and other organizations pertaining to involving and integrating youth with disabilities into the SILC's systems change efforts. *(Year 1)*

*Success Indicators:*

- *Youth leadership materials will be sent to all 10 CILs by the end of the first year of the SPIL*
- *The Youth Leadership committee which has already been formed will have more members and work with key staff in the DVR Youth Transition department to create a way to draw in more youth with disabilities to CILS and the SILC by the end of the SPIL period*
- *The SILC will collaborate in at least one youth related event during the course of the SPIL*

*Outcomes*

- *At least 3 CILs will have specific youth related services/programs in their Centers*
- *Youth with disabilities will have somewhere outside of school to get information about transition and life as an adult with a disability*
- *The SILC will be better able to include the youth perspective in its planning*

**Goal 4: Supporting the State Independent Living Center System**

The SILC is charged with developing the vision of the IL system in Colorado. It oversees that vision; communicating it to the Governor, State Legislators and Public Policy makers as well as to DVR and consumers around the state. It changes the vision based on information received from needs assessments, trends in service delivery and input through public hearings, etc. It looks ahead for challenges and opportunities that may impact the system.

1. The SILC will ensure that the mandated four core services will continue to be provided throughout the IL network, using the new quarterly report provide by the DSU .
2. The SILC will support and participate in discussions around creating a statewide data reporting system for the CILS. *(DVR responsible for this goal and time lines)*

*Success Indicators:*

- *Resource Development Committee will meet with representatives from ACCIL to hear how the Centers are doing in selecting software during the first year*
- *If all CILs agree on a software package (condition set by the designated state unit), the SILC will write a letter supporting the request for funding to purchase the software for all 10 CILS to the Colorado Joint Budget Committee*
- *At the time of the development of this SPIL, the DVR budget for 2008 had already been set. However, the IL Program Coordinator has created a justification document, and if funds can be found (and other conditions met), this plan can move forward. If there is not funding in the first year, the SILC and the IL Program Coordinator will advocate for funding during the next year's budget process.*



- *At least 8 of 10 CILs will purchase or obtain software to collect their service data*

*Outcomes:*

- *Colorado will have more accurate CIL service data to see how the CILs are doing in serving their communities*
- *Centers will be able to see how they compare to their peers in delivering services*
- *Centers will be able to look at their own data for gaps in services*

3. The SILC will receive and review quarterly reports of services delivered by CILs including the 704 Report. (*Year 1*)

- This information will be provided the Colorado IL coordinator's office.
- Reviewing the quarterly reports will be a standard part of each regularly scheduled SILC meeting.
- Members will look for trends in service delivery and make recommendations accordingly.

*Success Indicator:*

- *A report will be emailed out or distributed quarterly to SILC members starting with the October, 2008 new fiscal year. This report will contain service information from at least 8 of the CILs, to start.*

*Outcomes:*

- *The SILC will be able to get a sense of services and gaps in services by looking at the quarterly CIL activities/service report*
- *The SILC will have better information to determine needs that should be addressed in the IL system*
- *The SILC will be able to have ongoing information about the IL network's consistency with the SPIL.*

4. The SILC will engage in a statewide needs assessment process to determine unmet needs and unserved or underserved areas in the state so that the next SPIL will be based on specific data collected in a systematic way. (*Year 2 and 3*)

- The SILC and the IL Program Coordinator will present this budget item for the second year of the SPIL.
- The SILC Coordinator will research other states' needs assessments, communicate with DVR and other state agencies as appropriate to determine the estimated costs and collect surveys/methods for uncovering unmet needs.
- This information will be presented to the Executive Committee and shared as background information with the full SILC. The Executive Committee, working with representatives from ACCIL will put together a scope of services for the needs assessment.
- A needs assessment should include both qualitative methods such as focus groups and interviews with key informants, and a quantitative method such as a survey to gather information in a Participatory Action Research manner. It will be critical to not only assess the needs of consumers being served by the CILs, but also seeking out those who could be served in unserved or underserved communities to ensure the CILs begin to include those consumers statewide.

- The previous SPIL identified the deaf and hard of hearing population, rural and mountain consumers, and the Native American population as under served. Outreach efforts have begun and will be reported on in the 704 Report. However, it became evident that a thorough needs assessment will be necessary to identify issues unique to these and other under served populations.
- The Resource Development Committee will develop a budget based on the research provided by the SILC Consultant.
- Funding for the needs assessment will be secured.
- The SILC Coordinator will write a “bid document” and receive proposals.
- The Executive Committee and representatives from ACCIL will review the proposals and make a recommendation to the full SILC.
- The contractor will be engaged and begin the work.
- The SILC Coordinator will supervise the contractor. A joint ad hoc committee of the SILC and ACCIL will provide advice and oversight.

*Success Indicators:*

- *Funding will be provided to conduct the survey*
- *A consultant(s) will be hired to do the assessment*
- *A committee of SILC members and CIL staff will be set up to work together with the consultant so that the statewide needs assessment is more likely to succeed*
- *A written report on the results of the needs assessment will be completed before the SILC starts work on the next SPIL*

*Outcomes*

- *The SILC, CILs and other state/local programs serving people with disabilities will have data on the needs of persons with disabilities living in Colorado*
  - *100% of CILs in Colorado will use the data in the program planning activities*
  - *The Colorado Joint Budget Committee will use the needs assessment data to help it make decisions about funding for CILs and other disability-related programs*
5. The SILC will develop and implement a process by which it can purchase services for the projects and activities it cannot accomplish without assistance. *(Year 1)*
- The Resource Development committee will develop a purchasing process.
  - This will be managed by the SILC Coordinator who will put out notices and accept proposals.
  - When awarding funds, a committee made of SILC members who are not affiliated with any CIL, and DVR staff will recommend awardees to the SILC or will make the determination.

*Success Indicators:*

- *After negotiations with the DSU, a written policy on how the SILC uses its state dollars for purchasing services will be developed and implemented within the first year*
- *The SILC will successfully contract out for web page design and hosting*

*Outcomes:*

- *This process will increase the autonomy of the SILC from the DSU*
  - *The SILC will be able to secure the services it needs to conduct its business and communicate its activities to the wider community*
6. The SILC will support increased funding for the CILS in whatever way it can. (*On-going*)

*Success Indicator:*

- *The SILC will provide letters of support for increased CIL funding, as a system, upon request from ACCIL.*

*Outcomes:*

- *Increased positive regard from the CILs*
- *Better understanding of the funding issues the CILs face*
- *More funds for the CILs!*

7. Enhancing the quality of services to consumers and thus improving outcomes for consumers is extremely important to the SILC. Providing training to CILs' staff and board members is a vital key to that improvement. Funds to provide training and consultation to enhance CILs services and effectiveness will be made available. The SILC could elect to provide specific training statewide as well. Funding will also be set aside to send individuals to conferences and training sessions that will increase the quality and effectiveness of services to consumers or the Center or to the SILC overall. (*Year 1*)

- To determine training needs, the SILC will use the training and technical assistance table from the 704 Report, as well as requests for specific training needs the centers may have due to changes in personnel or local community needs.
- The Resource Development Committee working with the DVR will develop a process for application.
- CILs' application for these funds must state the goal of the training and how such training or consulting will be provided. Evaluations of the training should be shared with the SILC in a report sent after the training. Centers can apply individually or in regions and it is expected that any training provided will be open to other CILs, as appropriate.
- The SILC Coordinator will distribute the application and receive proposals. The applications should also be on the SILC website.
- A committee made up of non CIL affiliated SILC members and DVR staff will review and recommend (or make the decision).
- Funds for CILS should be distributed by reimbursement.
- DVR will handle distribution of funds.

*Success Indicators*

- *After negotiations with the DSU, a written policy and process will be created and implemented that details how training funds shall be applied for and awarded within the first year*

- *A committee of non CIL SILC members and DVR staff will be set up and orientation provided within the first year*
  - *100% of the training funds set aside in each year's budget (SPIL) will be expended*
8. The SILC will encourage and promote networking and peer support among program staff across the CILs. Activities to support this objective could include state or regional conferences for CIL staff and consumers, networking meetings (including training) for staff doing specific jobs (i.e., peer support counselors, IL skills trainers, program managers to name a few) across the region or state, as well as electronic communications between staff members doing the same work. *(Year 2 and 3)*
- *A portion of the SILC training funds will be used to provide regional training contingent upon training needs not met by the implementation of Goal 4.7. As in the previous SPIL, the SILC has found that the most effective trainings are developed as needs arise in our various geographical locations. The training to be offered will correspond to the issues identified in Section 1.1, and identified by RSA in the 704 Report.*
  - *The Executive Committee, in conjunction with the Resource Development Committee, will direct the SILC Coordinator to work with ACCIL to develop networking opportunities for CIL staff, using a variety of methods.*

#### *Success Indicators*

- *At least two statewide networking events will take place in years 2 and 3, using telecommunications tools such as captioned audio conferences or email and virtual conference room technology in which at least 6 CILs will participate*
- *At least two regional training sessions will occur (pending available funding) in different parts of the state and at least 3 CILs will participate.*

#### *Outcomes*

- *At least 5 CILs will allow staff to participate in networking events using telecommunications tools*
- *At least 3 staff from at least 5 CILs will participate in regional training*
- *Consumer satisfaction survey results will positively increase by 10 at at least three of the CILs participating in networking and training.*

#### 2007 Issues include:

- Housing
- Transportation
- Employment
- Quality Attendant Care (personal assistance)
- Immigration (people are required to go in person for papers and this can be difficult for a person with a severe disability)
- Lack of disability support services/Lack of awareness of ADA requirements in rural areas of the state
- Youth Transition
- Client Assistance Program's weak advocacy role for consumers of

ILCs/lack of deaf services in ILCs

- Election reform that does not take away newly acquired voting access
- Changing the attitudes of staff at the Single Entry Points (SEP)
- Cultural Competency (need a good basic definition and strategies for CILs to become culturally competent)
- Emergency Preparedness for people with disabilities (What do the counties have in their Emergency Preparedness plans for helping people with disabilities?)
- Assistive Technology services at CILs (new requirement on 704 reports)

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

- Identify the populations to be designated for targeted outreach efforts;
- Identify the geographic areas (i.e., communities) in which the targeted populations reside; and
- Describe how the needs of individuals with significant disabilities from minority group backgrounds will be addressed.

**In 2006, Colorado CILs began receiving an increase in state general fund dollars for the purpose of outreach activities and service provision in unserved and underserved areas. The ACCIL divided the unattached counties among all ten centers with the agreement that if any center was approached from services outside the designated catchment area, they would provide the requested service when possible, and also refer the consumer to the CIL designated to serve his or her county.**

**Using these new funds, two centers have opened new satellite offices. At least three other centers have hired “traveling” staff to cover rural territory. All ten have started new networking with related agencies in the additional counties, including submitting funding proposals to county and municipal governments.**

**Colorado is geographically diverse and in many areas, sparsely populated. We continue to work to expand services to people with disabilities on the Eastern Plains and in the mountain communities that are remote mountain communities.**

**In the previous SPIL, a task force was developed to determine the needs of the deaf and hard of hearing population. The results and recommendations were presented to the SILC in January 2007. A new work group has been formed to implement as many of the recommendations as possible. The deaf community has requested that each CIL hire an Independent Living Specialist who is deaf and culturally competent. At this time, there is no funding available that would not take away from CIL’s cross-disability service. The work group is looking into alternate funding sources, including the possible re-establishment of a state supported Deaf Commission. Deficiencies in effective communication, another of the task force finding, are being addressed also. A three part**

series in the Colorado Independent newsletter over the next four months is providing information on effective communication to CIL staff and DVR counselors. The work group has already met with key agencies to request that the Public Utilities Commission surcharge on land line telephone service be used to subsidize high-speed internet (for video relay service) for low income people who are deaf or hard of hearing.

Another target population identified in previous SPILs is our Native American population. There are two reservations in Colorado, the Southern Ute and the Mountain Ute. Both are located in hard to reach areas, and both have unique cultural biases about disability services. The SILC invited the Tribal VR directors to present at a SILC meeting. So far, we have hosted the representative from the Southern Ute tribe. She has agreed to provide cultural training to the SILC and CIL staff (date pending). After the training, SILC and CIL representatives will hold public forums on both reservations.

In the second year of this SPIL, the SILC will conduct a Needs Assessment to gather new information about unserved and underserved populations. Funding for this Needs Assessment will be requested from the DSU during budget negotiations in March 2008. In addition, the Colorado DBTAC has offered in-kind services that will be determined based on the amount allocated to the SILC. As a preliminary study, the IL Program Coordinator has created a survey that will be sent to each county's Social Service contact (at no cost) to assess whether the remote counties have received adequate outreach from the centers.

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

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

1.3A Financial Plan Tables

Complete the financial plan tables covering years 1, 2 and 3 of this SPIL. The first column in each of the tables lists the potential SPIL funding sources. The four other columns represent the potential uses of funds. For each funding source, provide estimated dollar amounts anticipated for the applicable uses. To the extent possible, the tables and narratives must reflect the applicable financial information from centers for independent living. Refer to the SPIL Instructions for additional information about completing the financial tables and narratives.

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

**Year 1**

<b>Sources</b>	<b>Approximate Funding Amounts and Uses</b>			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
<b>Title VII Funds</b>				

Chapter 1, Part B	30,000		275,000	
Chapter 1, Part C			921,000	
Chapter 2, Individuals Who are Older Blind		406,000		
<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other			952,300	
<b>Non-Federal Funds</b>				
State Funds	48,500	1,445,000		
Other			860,000	

**Year 2**

<b>Sources</b>	<b>Approximate Funding Amounts and Uses</b>			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
<b>Title VII Funds</b>				
Chapter 1, Part B	30,000		275,000	
Chapter 1, Part C			921,000	
Chapter 2, Individuals Who are Older Blind		406,000		
<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other			952,300	
<b>Non-Federal Funds</b>				
State Funds	82,480	1,500,000		50,000
Other			860,000	

**Year 3**

<b>Sources</b>	<b>Approximate Funding Amounts and Uses</b>			
	SILC Resource Plan	IL Services	General CIL Operations	Other SPIL Activities
<b>Title VII Funds</b>				
Chapter 1, Part B	30,000		275,000	
Chapter 1, Part C			921,000	
Chapter 2, Individuals Who are Older Blind		355,000		
<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)				
Other			952,300	
<b>Non-Federal Funds</b>				
State Funds	81,980	1,500,000		10,000
Other			860,000	

### 1.3B Financial Plan Narratives

1.3B(1) 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.

**The DSU coordinates and distributes Title VII Part B funds and State General Funds in accordance with the following State Independent Living Rule:**

#### **9.218.1 State Allocation [Eff. 7/1/00]**

**The state shall allocate funds to centers that participate in the CILCS program. Funds to be allocated include funds appropriated in the Appropriation Bill for Independent Living Services. The allocation represents the maximum amount of funds that a center may be reimbursed under the CILCS program.**

#### **9.218.2 Components of the Allocation for Each Center [Rev. eff. 7/1/05]**

**The allocation for each center shall be based on two components:**

- A. Component 1: a fixed amount that is the same for each center.**
- B. Component 2: an amount that may vary for each center based on the four core**



services and the professional judgment of the SILC and the provider association. It is further the intent to provide the most support to centers that have the fewest resources to use for the provision of core independent living services.

### **9.218.3 Determining the Amount Allocated for Each Center [Rev. eff. 7/1/05]**

The amount allocated for each center for the State Fiscal Year is based on the amount of State General Funds and Federal funds available for disbursement during each year.

#### **A. Component 1**

1. The amount that shall be allocated for Component 1 (see Section 9.218.2) shall equal the amount of State General Funds divided by the number of centers that apply for funding under the CILCS in accordance with Section 9.217.3. This amount will consist of the State General Fund for Independent Living to be divided equally among the number of centers that apply for funding under the CILCS program.

2. If the total amount of funds to be allocated increases or decreases during a fiscal year, the following formula shall take place:

a. An increase in the State General Fund for Independent Living for the CILCS program shall be distributed equally by the number of centers that apply for funding under the CILCS in accordance with Section 9.217.3.

b. If the total amount of funds in the State General Fund for Independent Living for the CILCS program decreases, the amount to be allocated to each center that applies for funding shall be equal to the amount available for allocation divided by the number of centers that apply for funding.

#### **B. Component 2**

The amount to be allocated for Component 2 (see Section 9.218.2) shall be equal to funds allocated to the State of Colorado from the federal government under Part B of the Act. Each center that applies for funding under the CILCS program in accordance with Section 9.217.3 shall receive a level of additional support of funding based on the four core services and the professional judgment of the SILC and the provider association; and, it is further the intent to provide the most support to centers who have the fewest resources to use for the provision of core independent living services. The tiered system for allocation of funding is as follows:

1. Tier I includes centers which will each receive 3.06% of the total amount available for Component 2. (Atlantis, CPWD)

2. Tier II includes centers which will each receive 9.89% of the total amount available for Component 2. (CSIC, CFI, and DRS)

3. Tier III includes centers which will each receive 13.58% for Component 2. (ILC Craig, SWCI, Connections, and CFD)

4. If one or more centers do not apply for funding, the amount that would have been allocated to those centers shall be allocated to the centers in Tier Group I, II, or III that applied for funding. Each center's allocation shall be

increased by an amount proportional to the percent for the center's tier.

**C. Direct Federal Funds**

Some centers receive funds directly from the Federal government under Part C of the Rehabilitation Act of 1973, as amended. The total amount allocated to independent living centers in Colorado may increase from one Federal fiscal year to the next. The Federal government identifies the increases in two categories:

1. a portion for a cost of living adjustment; and,
2. A portion for other than a cost of living adjustment.

**D. Each Center for Independent Living (CILS) in the state is entitled to an equal share of an increase in the Part C funding after the cost of living allocations have been distributed to those centers that receive Part C funding, until such time that each center's base budget, consisting of State General Funds and Part C funds specifically allotted for the operational support of Centers for Independent Living in Colorado, is \$250,000 for each center. The following allocation procedure shall apply:**

**The DSU distributes and provides oversight for Title VII Chapter 2 OIB funds. The funds are distributed in a three year cycle, to vendors throughout the state, following a competitive Request for Proposal process administered by the State Procurement Office.**

**In each of the three years of the financial table, the \$860,000 in the “other” category represents the aggregate of foundation, corporate, and individual fundraising of all ten centers for the purpose of providing independent living services. The amount shown represents revenue targets and usual amounts of “other” income. Therefore, this funding is not guaranteed.**

**1.3B(2) 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 SILC is hoping to partner with Rocky Mountain DBTAC for a statewide needs assessment in the second year of the SPIL. Though not confirmed, it is possible that the DBTAC involvement will be in-kind.

1.3B(3) Provide any additional information about the financial plan, as appropriate.

**The following SILC Budget Narrative describes many of the steps the SILC is taking to build a strong infrastructure and assert its autonomy:**

**Draft Budget Justification: Statewide Independent Living Council**

**This budget justification covers the new three year State Independent Living Plan budgets. The first year, 08 funding remains the same as it has for several years: \$48,500. While some expenditures have shifted, the amount remains the same. However, in budget years 09 and 10, things begin to change as the SILC rebuilds its infrastructure to be more effective in meeting its mission. The SILC will request a budget increase from DVR during**

the March 2008 budget planning session for DVR. Although funds have not been guaranteed, the relationship with DVR has improved from previous years, and DVR acknowledges the serious effort being made by the SILC to improve the state's IL network. The SILC has been able to clearly communicate its goals to DVR and to keep the CILs and DVR informed of its work in a bi-monthly newsletter. All budget increases above the current \$48,500 are contingent upon DVR awarding the increase. Goal areas that are contingent on the increased funding will be revised and submitted to RSA for approval if additional funds are not granted.

The SILC's mission is "To use the collective power and legal mandate of the independent living movement to develop and secure public policies that ensure civil rights and expand options for all persons with disabilities in every aspect of life." The SILC works with the 10 Centers for Independent Living and the Division of Vocational Rehabilitation to create the federally required State Independent Living Plan and then oversees it. The SILC also provides advocacy and education to state public policy makers about state policies that impact Coloradoans with disabilities. The Gubernatorial appointed board representative of all disabilities and across the geographic area of Colorado. Currently we have 15 members and are encouraged to have 23 members.

A recruitment brochure has been developed and a recruitment plan is in place to fill vacancies to comply with geographic, ethnic, and disability status positions in the executive order. Currently, five applications are being reviewed, all of them from applicants outside the Denver-Metro area. The expected increase in SILC membership may require an additional budget request for meeting expenses due to the SILC's commitment to have a statewide presence, offering public comment opportunities in many locations around the state.

#### **Personnel**

In budget year '08 and carrying over to '10, the SILC is requesting to make its SILC Coordinator full time at a proposed salary of \$50,000. The salary amount was determined based on the median pay for state employees and the relative salaries of Colorado non-profit executive directors. The additional \$20,000 budget request will be allocated from state general funds awarded to DVR.

The SILC has had a difficult time meeting its mission effectively without staff. Given that this is an all volunteer board made up of people who work, it is very difficult to rely on them for research, writing documents, setting up meetings and providing the day to day leadership to move the SILC agenda forward. This position is extremely important as the glue that holds the Council together. This is doubly true when the Chairperson becomes incapacitated, as happens from time to time. Currently the position is titled SILC Trainer/Advocate and is a Part B contract that the DVR holds for the SILC and is funded at \$30,000.

Travel for SILC meetings will increase by \$3000 in 09 to allow for more members and/or increase in members to attend our meetings. In 08 we increased the number of meetings from 4 to 6 and carry that forward in 09 and 10. Given the state plan activities that we

have planned for this three-year cycle, we need more time to meet. A number of years ago, the SILC did meet 6 times a year and was deemed more effective as a result. We are requesting the additional dollars to support more members and/or hotel cost increases in 09 and 10. The SILC travel budget for meetings will go from \$12,000 in 08 to \$15,000 in 09 and \$18,000 in 10.

Meeting costs refer to the costs for the actual meeting such as catering, room rental and equipment. In 08 we project the cost of a meeting to be \$450 based on our recent meeting history. In 09 and 10 we increased the cost by \$50 per meeting each year. So the annual budget for this line item goes from \$2700 to \$3300 over the three year period.

Program Accommodations allow us to provide sign language interpreting for the deaf and hard of hearing, personal assistance for those attending the meeting who are severely disabled and may need assistance with eating, toileting and handling paper during the meeting. This is conservatively budgeted at \$300 a meeting for 08 and rises up to \$500 per meeting in 10. If we have a deaf Council member the cost for interpreting will rise significantly and we will need to supplement costs from another line item.

Operating costs include teleconferencing which is one of the main ways the Council gets its work done in between meetings. There are up to 6 committees that meet and work on SILC priorities with the SILC Coordinator. Some meet monthly and some meet only as needed. In 08 we anticipate \$4800 for teleconference costs. However, in 09 and 10 we will be trying to use the virtual conference room through the Rocky Mountain Disability and Technical Assistance Center (RMDBTAC). They have offered to host our calls for free. This takes some technical savvy so we will be working with our members to get them up to speed on using the Internet for virtual meetings. This is how we hope to reduce our operating costs from \$7080 in 08 to \$5080 in 10.

Training Funds provides funding for one of the most fundamental goals of the SILC, enhancing the services provided by the Centers for Independent Living so that outcomes are better for consumers with disabilities and their families. In 08 we propose to provide each CIL with up to \$1000 in Technical Assistance funds that they must apply for, justify the need and report on the outcome of such TA. In 09, we have decreased this line item to \$5000 since we will be sending CIL staff to a regional independent living conference that year. However in both 09 and 10 we want to provide training and technical assistance to CILS who are participating in the Systems change network. So we have kept \$5000 in the 09 budget and increased the 10 budget to \$20,000.

The Systems change network will provide information and training first to CIL staff then to consumer in the local community (including youth) that will empower them to participate in state and local public policy discussions and decisions that impact people with disabilities. This training, sometimes called leadership training, will include such things as how state agencies work, conducting successful meetings, community organizing and public speaking, among other things. The SILC can put out policy briefs to the network, conduct discussions by teleconference or Internet and educate policy makers and consumers. The SILC will also create opportunities for dialogue between people with

disabilities, CIL staff and state agencies.

To do these sorts of activities requires researching the issues, discussing them, writing a brief and disseminating it as well as all the interpersonal skills in collaborating and educating others. The Systems Change Network training will be focusing on that goal in 09 and 10, which is why funds are left in that line item in 09 and significantly increased in 10.

Attendance at conferences is important to stay abreast of what is happening in other states, nationally and in our field. The SILC is putting \$8000 for travel and registration for 2 SILC members to travel to the SILC Congress, our national organization as well as the National Council on Independent Living and the Association of Programs for Rural Independent Living. Also we have put aside some funds for SILC members and CIL staff to apply to attend out of town conferences on topics that will improve the effectiveness of the SILC or CIL. The SILC plans to send at least one SILC member to the SILC Congress, NCIL, and APRIL. A policy is being developed to determine the value of other conferences and trainings and determine who is eligible to attend if SILC funds permit. This line remains at \$8000 for 09 and is proposed to be increased in 10 to \$9000 to cover increased travel costs.

Special Projects is a new line item for the SILC. There is one new project and two returning projects. The Statewide Needs assessment is estimated to cost \$50,000 in the 09 budget year. The projected cost is based on the costs incurred by other states (California spent \$100,000 for a needs assessment nearly 10 years ago).

Supporting sending the CILs' staff and SILC members to the next regional IL conference is also in 09 and projected to cost \$20,000. This amount is similar to what the SILC has spent in the past for a statewide conference. Evaluation of those conferences by CIL staff and SILC members determined that they were less effective than the opportunities provided by a regional conference.

Finally, the SILC will need to hold public hearings for the next three year plan in 10 at a projected cost of \$10000.

The Colorado IL network has identified unserved and underserved populations in the past from a small number of public hearings, public forums, and hearsay evidence. We have been targeting the deaf and hard of hearing population, rural consumers, Native Americans, and monolingual Spanish-speaking consumers. Although these populations have traditionally been underserved, there is a need to further explore the real needs of all people with disabilities in Colorado. The statewide needs assessment will be the first of its kind in the memory (and records) of those working in the network today. It can be used to determine where and who we are not providing independent living services as well as how we might do a better job of serving those who do get our services. From this information, the SILC can do a better job of developing the IL plan for the State and Centers can better target their funds and services. The Joint Budget Committee can better see where there are gaps and responsibly increase funding to the CILS when new funds are available. We have estimated the cost for a complete needs assessment to be \$50,000. This will include

focus groups in key areas across the state, a paper and pen/Internet survey as well as key informants interviews and an analysis of public data about the prevalence of disability in Colorado as well as the public benefits they use.

The Regional IL Conference is hosted every other year in a state within our 6 state federal region. In 07 the conference is being hosted in Wyoming and the SILC is spending approximately \$20,000 to send SILC members and CIL staff and consumers to the two day conference in Casper WY. With a conference this large, national speakers come in to share what is happening in the national disability policy discussion. CILs and other disability related programs share best practices across the region. It is a terrific opportunity to get our staff and consumers together as well as learn about how others do the same work we do, perhaps more effectively or efficiently. The next conference will be in 09 and we have budgeted another \$20,000 for that project.

Finally, three years from now, we will need to be holding new public hearings across the state about the SILC's next three year plan. We anticipate that costs will run about \$10,000 for those hearings.

#### **Addendum**

The benefit for the State for increasing the personnel funds for the SILC will be a much more functional State IL Council that will be better able to manage its funds, oversee the work of the IL network and provide advocacy leadership and training opportunities for people with disabilities. The State is much more likely to get its money's worth from a volunteer board if a high level staff person is attached to it. The benefit for consumers is that they will get information about public policies that impact them, they will get better services from their local CIL as technical assistance and training opportunities enhance their centers. Finally, there could be more integration and access for people with all types of disabilities across Colorado. The SILC should play an important role in advocating for true inclusion of our community in to the life and fabric of Colorado.

#### **1.4 Compatibility with Title VII and the CIL Work plans – 34 CFR 364.42(c) and (e)**

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

**The SPIL objectives create new opportunities for people with disabilities to become involved with the policies that lead to access and integration. The issues identified by the ACCIL in the SPIL meetings, and their individual work plans provided us with the emerging priorities of systems change (housing, transportation, etc.) and the need to make independent living more available to youth.**

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.

**After collecting and reviewing the work plans of all ten CILs, the SILC met with the Association of Colorado Centers for Independent Living (ACCIL) to further discuss the priorities of each geographical region. These priorities were used to draft the four goals. A series of weekly meetings were set up to hammer out the appropriate objectives. SILC members, CIL directors, and DSU representatives attended these meetings. The targeted service areas are listed in Section 1.1. Objectives, indicators, and outcomes appear with each state plan goal.**

#### 1.5 Cooperation, Coordination, and Working Relationships Among Various Entities – 34 CFR 364.26

Describe the steps that will be taken to maximize the cooperation, coordination and working relationships among:

- a) The SILS program, the SILC, and centers; and
- b) The DSU, other State agencies represented on the SILC, 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.

**As part of the creation of the goals and objectives of the SPIL, we identified key entities that were missing from the SILC. The membership committee has been tasked with recruiting non-voting members who represent targeted state agencies that provide services to people with disabilities such as: Colorado Department of Special Education, AT Partners, Division of Mental Health, Department of Healthcare Policy and Financing, Division of Housing, Department of Transportation, State Emergency Preparedness, and the Native American 121 Program. In addition, the SRC and SILC will communicate on a regular basis through the designated SILC/SRC member. As stated in the SPIL goals and objectives, at least one representative from these agencies will be invited to attend each SILC meeting for the purpose of mutual understanding and developing stronger collaborative relationships. Where consistent with the executive order, individuals from some of these agencies may be recruited as SILC members.**

#### 1.6 Coordination of Services – 34 CFR 364.27

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

**Formal systems are in place to help us avoid duplication of services across the state. The DSU carefully considers each center’s work plan, looking for any inappropriate or unnecessary use of resources. Monthly billing for IL services includes details of services provided. In addition, the DSU visits each CIL at least once a year, and engages in a formal**

site review for each center every three years.

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

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

**There are seven OIB contracts in place in Colorado, all services are provided by Colorado CILs during this SPIL cycle. Contracts were awarded based on a proposal process that required well-defined IL services in addition to typical OIB services. The OIB vendors are spread throughout the state, and even with very limited funds, centers holding the grants are doing outreach into underserved populations and developing methods to reach as many people as possible.**

**The OIB program is subject to the same monitoring as the core services program. Consumers must have an Independent Living Plan and all other typical CSR requirements. A monthly report, based on 7OB data is required of OIB providers, along with the consumer service notes each month. OIB files are reviewed during the annual site visit, and when possible, the IL Program Coordinator attends OIB peer groups or other OIB activities.**

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

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

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

<b>Table 2.1A(1): Independent living services</b>	<b>Provided by the DSU (directly)</b>	<b>Provided by the DSU (through contract and/or grant)</b>	<b>Provided by the CILs (Not through DSU contracts/ grants)</b>
Core Independent Living Services, as follows:			
- Information and referral		x	x
- IL skills training		x	x
- Peer counseling		X	x
- Individual and systems advocacy		x	x
Counseling services, including psychological, psychotherapeutic, and related services			



<b>Table 2.1A(1): Independent living services</b>	<b>Provided by the DSU (directly)</b>	<b>Provided by the DSU (through contract and/or grant)</b>	<b>Provided by the CILs (Not through DSU contracts/ grants)</b>
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)			x
Rehabilitation technology			
Mobility training		x	x
Services and training for individuals with cognitive and sensory disabilities, including life skills training, and interpreter and reader services		x	x
Personal assistance services, including attendant care and the training of personnel providing such services			x
Surveys, directories and other activities to identify appropriate housing, recreation, accessible transportation and other support services			x
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		x	x
Education and training necessary for living in the community and participating in community activities		x	x
Supported living			
Transportation, including referral and assistance for such transportation		x	x
Physical rehabilitation			
Therapeutic treatment			
Provision of needed prostheses and other appliances and devices			
Individual and group social and recreational services		x	x

<b>Table 2.1A(1): Independent living services</b>	<b>Provided by the DSU (directly)</b>	<b>Provided by the DSU (through contract and/or grant)</b>	<b>Provided by the CILs (Not through DSU contracts/ grants)</b>
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		x	x
Services for children with significant disabilities			
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities			
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future		x	x
Community awareness programs to enhance the understanding and integration into society of individuals with disabilities		x	x
Other necessary services not inconsistent with the Act		x	x

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

**Our goals do not reflect service priorities.**

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:

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

Indicate N/A if not applicable.

N/A

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

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

**The DSU administers Part B funds to four CILs. All ten centers receive state general funds for the provision of core services. The DSU contracts on a local DVR office basis with six centers for the provision of employment services. Seven CILs have OIB contracts that are administered by the DSU.**

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.

**DVR examines CSRs during regular site reviews and monitoring visits to determine the CILs compliance with the Act. During these visits, the IL Program Coordinator meets with some consumers to observe whether the cross-disability compliance indicator is being met.**

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

#### 3.1 Existing Network – 34 CFR 364.25

3.1A 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.

**There are ten certified centers for independent living in Colorado. Part C CILs include: Atlantis Community, Inc., Denver; Disability Center for Independent Living (DCIL), Denver; Center for People With Disabilities (CPWD), Boulder; Disabled Resource Services (DRS), Fort Collins; Connections for Independent Living, Greeley; Center for Disabilities (CFD), Pueblo; and Center for Independence (CFI), Grand Junction.**

**Non Part C (Part B only) centers include: Independent Life Center (ILC), Craig; Colorado Springs Independence Center (CSIC), Colorado Springs; and Southwest Center for Independence (SWCI), Durango.**

**CPWD operates a satellite office in Longmont, DRS runs a satellite in Loveland, DCIL has a branch office at the Aurora Mental Health Center, CFD has recently opened a satellite office in Alamosa, and CFI opened a satellite office in Montrose. All ten centers belong to the Association of Colorado Centers for Independent Living (ACCIL), and the CILs are well represented on the SILC. In recent years, this network has shown solidarity in statewide advocacy issues as well as in their work with the SILC and DSU to expand state funding for independent living.**

#### 3.2 Expansion of Network – 34 CFR 364.25

3.2A 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).

**An agreement was made between the ACCIL and the SILC that no new centers would be established until the base funding level of all centers reached at least \$250,000, an amount considered necessary for stabilization. In the ongoing effort to make this happen, the ACCIL, SILC, and DSU advocated with the State Joint Budget Committee for increased funding which was allocated in SFY06. With these funds, the network of centers agreed to develop strategies for serving consumers in previously unserved and underserved geographic areas. A number of new strategies are being employed to reach these populations, including: itinerant staff, placement of staff, on defined days of the week, in small town social service offices; outreach through electronic networks and videoconferencing; and feasibility studies for opening satellite offices. The centers have also agreed to serve any consumer in any part of the state if contacted by the consumer. The work that the centers have done over the past year has led to the conclusion that a formal Needs Assessment is warranted to ensure that all areas of the state are receiving adequate and appropriate services.**

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

N/A

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.

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.

## **Section 4: DSU**

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

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

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

**The DSU employs a .5 FTE solely for administrative assistance to the SILC. This person is supervised by the DSU but, for the most part, takes direction from the SILC Chair. Duties include: arranging SILC meetings, reimbursing SILC members for travel and other meeting expenses, paying SILC bills and tracking SILC expenditures, providing a monthly financial report, maintaining the SILC roster, distributing meeting notices, and other duties as assigned.**

**The DSU also contracts with a non-profit to provide a SILC Coordinator responsible for supporting the SILC in achieving the goals and objectives of the state plan. The job description is modified every three years to ensure that the person hired for this position**

will meet the needs of the SILC.

**The DSU employs an FTE to serve as the state's Independent Living Program Coordinator. This person is the designated liaison with the SILC, attending all SILC meetings and providing technical assistance. The role of the ILPC with the network of centers includes monitoring, oversight, and technical assistance. The ILPC promotes collaboration between the centers, SILC, and DSU. Among other collaborative efforts, a bi-monthly newsletter is produced and distributed to all parties.**

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

## **Section 5: SILC**

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

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

**During this three year SPIL cycle the SILC will be rebuilding its infrastructure and processes as well as taking on several new projects. The first year's operating budget will be \$48,500 (State general fund) and its personnel budget will be \$45,000 (Part B and DVR funds) for a total of \$93,500. The second and third year's increases will most likely come from the State's general fund and in kind donations from other state organizations that have an interest in IL matters. The total budgets for those years fluctuate with special projects that will have a beginning and an end.**

**The personnel budget is funded through Part B (\$30,000 for SILC Coordinator and \$15,000 from DVR general fund for administrative support). The operating budget will provide funds for up to six SILC meetings, three of which will be at CIL locations. The goal is to visit all 10 CILS over the three year cycle of this SPIL. Between \$15,000 and \$18,000 has been budgeted for that purpose. Additionally, \$10,000 or up to \$1000 per center will be available for Technical Assistance grants that the CILs can individually or jointly apply for. These funds will be used to enhance services and the effectiveness of CILs. Funds for conferences including SILC Congress, APRIL Conference and NCIL conference have been allocated so that 2 people can attend each one. Another \$3000 has been set aside to help CIL staff and SILC members travel to out of town conferences or training that will directly benefit the CIL, the SILC and/or services to consumers. Operating costs also include funds for committee teleconferences, postage, printing, etc. Finally, this SPIL budget contains a Professional Services line item to allow for a Web designer/maintenance contract and a graphic designer to put together a print template for materials such as policy briefs that the SILC intends to disseminate for advocacy purposes.**

**The second year of the SPIL will see the SILC Coordinator go to full time (\$50,000 proposed salary) and a comprehensive statewide needs assessment (approximately \$50,000). We are anticipating that the Rocky Mountain Disability and Business Technical Assistance Center and the state's grant funded Tech Act program will contribute to the costs of this as well as the State. In 2009, there will be another regional IL conference so funds will be targeted to help CIL staff and SILC members attend that conference, which occurs every other year.**

**In the third year, costs for producing the next state plan including public hearing costs will be included. Throughout the three year span, we will be looking to spend unused dollars on creating networking opportunities for CIL staff beyond the directors. This might include regional and state meetings for specific groups of staff as well as email and web connections. Our goal is to create a strong, supportive network for all CIL staff with their counterparts across the state.**

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.

**The duties of the SILC Treasure as stated in Section VI F of the by-laws include oversight of the resource plan, monitoring expenditures, providing financial statements to SILC members, and chairing a Resource Management Committee that assists in oversight and helps to plan the SILC budget.**

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

**The resource plan supports the autonomy of the SILC.**

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

**The resource plan was developed jointly by the Resource Management Committee and the DSU. The DSU has agreed to advocate for additional state funding for the second and third years of the plan in order to advance the growth and autonomy of the SILC, and provide funding for a Needs Assessment. If these funds are not allocated, the SILC can carry out all other goals and objectives of the SPIL by reverting to the first year budget amount of \$48,500, and by soliciting in-kind assistance and available technical assistance relevant to the financial growth of the SILC.**

5.2 Establishment and Placement – 34 CFR 364.21(a)

5.2A Describe how the establishment and placement of the SILC ensures its independence with respect to the DSU and all other State agencies.

**The Colorado SILC was established under Senate Bill 97-141. It is an autonomous body**

**with control of its finances for which the DSU is the fiduciary agent. The SILC is awarded a budget amount by DVR, 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, then appointments are made by the governor. The DSU 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 at different locations around the state, often hosted by CILs. Committee meetings are usually accomplished by conference call. The SILC staff person is supervised by the SILC chair and is typically a subcontractor of a non-profit and is not directed by the DSU in any way. The IL Program Coordinator for the DSU is an ex-officio, non-voting member of the SILC.**

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

5.3A Describe the process used by the State to appoint members to the SILC who meet the composition requirements in section 705(b).

**The Colorado SILC, follows all mandates set out in Section 705 of the Rehabilitation Act of 1973, as amended. The Executive Order creating the Colorado SILC provides for 23 seats on the SILC. These must be filled in accordance with Section 705. The SILC By-Law reflect 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 ensures 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 seat 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.**

### 5.4 Staffing – 34 CFR 364.21(j)

5.4A 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.

**The SILC does not currently employ or supervise staff.**

- 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 primary SILC support, the SILC Coordinator, is under contract outside the DSU, and receives direction from the SILC chair. The administrative support .5 FTE provided by the DSU has no other duties than those necessary for the operation of the SILC.**

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

Describe how the following service provider requirements will be met:

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

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

**The DSU monitors all ten 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 DSU 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 DSU distributes training materials and notices of training opportunities supplied by the Region 8 ILNet Coordinator. The SILC, in the resource plan for this SPIL, has allocated funds to provide training and conference participation for CIL staff.**

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

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

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



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

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

#### 6.3 Record-Keeping, Access and Reporting – 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37

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

**All contracts for independent living services and OIB services between the DSU and the CILs require assurances of record keeping in compliance with federal requirements. The DSU 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

**The DSU receives and reviews the annual performance reports of all ten 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 DSU provides access to such documents to any duly authorized entity.**

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

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

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

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

**Information and referral continues to be a core service of all CILs, and is available to eligible consumers 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.**

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

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

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

**No eligible consumer is excluded due to residence requirements.**

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

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

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

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

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

**A document describing access to CAP services in the most appropriate format for the consumer is issued during the IL intake, and a signed copy becomes part of the consumer service record.**

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

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

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

## **Section 7: Evaluation**

7.1A Describe the method that will be used to periodically evaluate the effectiveness of the plan in meeting the objectives established in Section 1. The description must include the State's evaluation of satisfaction by individuals with significant disabilities who have participated in the program. *34 CFR 364.38*

**This state plan was created with the input of consumers, CILs, the DSU, and the SILC, collaborating successfully for the first time in recent history. The evaluation of the plan will be equal to the deliberate thoughtfulness that created it.**

**The SILC's State Plan Committee is charged with reviewing all SPIL goals and objectives at least quarterly. The SILC has requested, and will be provided, quarterly reports from the ten CILs in similar format to the 704 annual performance report, to identify trends in services and categories of consumers and whether services are consistent with the SPIL. The DSU will monitor the centers based on compliance with the SPIL, and will ensure that CILs meet their requirement to conduct an annual consumer satisfaction survey. All parties, working together, will use the Needs Assessment called for in this SPIL to evaluate the efficacy of services, the need for new services, and the degree to which our outreach efforts are bringing services to the unserved and underserved populations. Data collected will result in more relevant goals and objectives in the next SPIL, or revisions and amendments to this one.**

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

8.1A Identify any State-imposed requirements contained in the provisions of this SPIL.

Indicate N/A if not applicable.

**In the distribution of state general funds, centers are required to select two services, in addition to the four core services, to be reported in the monthly billing process.**

**Colorado is currently drafting legislation requiring that people receiving state funded services must present documentation of their legal presence in the United States in order to establish eligibility for services. There is some confusion about whether or not centers can serve eligible consumers, without proper documentation, with federal funds.**