

**State: COLORADO**

**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 2011-2013**

Effective Date: October 1, 2010

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## PART I: Assurances

State of: **COLORADO**

### Section 1: Legal Basis and Certifications

- 1.1 The designated State unit (DSU) eligible to submit the State Plan for Independent Living (SPIL or the plan) and authorized under State law to perform the functions of the State under the State Independent Living Services (SILS) and Centers for Independent Living (CIL) programs is **Colorado Division of Vocational Rehabilitation**.<sup>34 CFR 76.104(a)(1) and (2); 34 CFR 364.22(a)</sup>
- 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 NA (insert name of separate State agency). Indicate N/A if not applicable. <sup>34 CFR 76.104(a)(1) and (2); 34 CFR 364.20(d) and 364.22(c)</sup>
- 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 SILC**. <sup>34 CFR 364.21(a)</sup>
- 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. <sup>34 CFR 76.104(a)(7); 34 CFR 364.20(c) and (d)</sup>
- 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. <sup>34 CFR 76.104; 34 CFR 80.11(c)</sup>
- 1.6 The SPIL is the basis for State operation and administration of the program. All provisions of the SPIL are consistent with State law. <sup>34 CFR 76.104(a)(4) and (8)</sup>
- 1.7 The representative of the DSU and, if applicable, of the separate State agency authorized to provide VR services to individuals who are blind, who has the authority under State law to receive, hold, and disburse Federal funds made available under the SPIL and to submit the SPIL jointly with the SILC chairperson is **Nancy Smith, DVR Director** and NA (Name, title of separate State agency director, if applicable). <sup>34 CFR 76.104(a)(5) and (6)</sup>

### Section 2: SPIL Development

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

- The development and support of a statewide network of centers for independent living; and
  - Working relationships between programs providing independent living services and independent living centers, the vocational rehabilitation program established under title I, and other programs providing services for individuals with disabilities. *34 CFR 364.20(f)*
- 2.2 The 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 364.20(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:
- appropriate and sufficient notice of the public meetings (that is, at least 30 days prior to the public meeting through various media available to the general public, such as newspapers and public service announcements, and through specific contacts with appropriate constituency groups and organizations identified by the DSU and SILC);
  - reasonable accommodation to individuals with disabilities who rely on alternative modes of communication in the conduct of the public meetings, including providing sign language interpreters and audio-loops; and
  - public meeting notices, written material provided prior to or at the public meetings, and the approved State plan in accessible formats for individuals who rely on alternative modes of communication. *34 CFR 364.20(g)(2)*
- 2.4 At the public meetings to develop the State plan, the 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:
- the availability of the CAP authorized by section 112 of the Act;
  - the purposes of the services provided under the CAP; and
  - how to contact the CAP. *34 CFR 364.30*
- 3.4 Participating service providers meet all applicable State licensure or certification requirements. *34 CFR 365.31(c)*

### **Section 4: Eligibility**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Section 9: Signatures**

After having carefully reviewed all of the assurances in sections 1 - 8 of this SPIL, the undersigned hereby affirm that the State of **Colorado** is in compliance and will remain in compliance with the aforementioned assurances during **federal fiscal years 2011, 2012, and 2013.**

The effective date of this SPIL is October 1, 2010 (year)

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SIGNATURE OF SILC CHAIRPERSON

DATE

Julia Beems

NAME OF SILC CHAIRPERSON

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SIGNATURE OF DSU DIRECTOR

DATE

Nancy Smith, Director, Division of Vocational Rehabilitation

NAME AND TITLE OF DSU DIRECTOR

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

DATE

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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)

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

#### MISSION

**Colorado offers equal and full participation in professional and community life to all people with disabilities. We recognize the value of all people, and acknowledge their rights to dignity, freedom and inclusion. We support a cross-disability, multicultural and disability justice perspective that promotes consumer control. We believe that the application of independent living philosophy and the delivery of independent living services create an environment that supports the potential of all Coloradoans.\***

*\*inspired by the mission statement of the Silicon Valley Independent Living Center.*

#### GOALS

- 1. The SILC, DSU, and ACCIL work together to support the delivery of IL services to all eligible consumers.**
- 2. Coloradoans with disabilities have access to basic needs: housing, transportation, employment, and healthcare.**
- 3. The SILC, DSU, and ACCIL work together to increase awareness of and access to independent living services for the unserved and underserved populations identified in the statewide needs assessment.**
- 4. IL consumers have access to appropriate technology.**

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

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

- 1. The SILC, DSU, and ACCIL work together to support the delivery of IL services to all eligible consumers.**

**Objective 1.a:** The SILC will host a meeting, inviting RSA, to review roles and responsibilities of the SILC, DSU, and ACCIL in order to clarify appropriate activities intended to support services for IL consumers. (Year one)



**Activity (SILC):** Schedule meeting

- a. determine availability of RSA
- b. set the meeting date
- c. determine meeting agenda

**Outcome Measure:** All parties will acknowledge their roles and demonstrate mutual respect.

**Objective 1.b:** The DSU will ensure the delivery of the four core services of advocacy, IL skills training, peer support and information and referral. (ongoing)

**Activity:** The DSU will review monthly IL reports and use data to chart trends in services, outreach, and program growth. (ongoing)

**Activity:** The DSU will provide a quarterly state of the network report to the SILC and ACCIL and make the report available on the SILC website. (ongoing)

**Activity:** The SILC, DSU and ACCIL will review definitions currently being used for service data collection (704 Report) in order to ensure consistency in reporting. Natural venues such as SILC or ACCIL meetings may be used, as well as teleconferences. (ongoing)

**Activity:** The SILC, DSU and ACCIL will review state IL Rules, considering changes that enhance service delivery. This review will occur over time, possibly led by a work group of members from each organization. Rule changes require public hearings before implementation. (year one)

**Outcome Measure:** More consistent 704 Report data.

**Objective 1.c:** The SILC, DSU, and ACCIL use data collected in the statewide needs assessment to explore current and future coverage and funding of CIL catchment areas. (year one)

**Activity:** The SILC, DSU and ACCIL will review the IL network:

- a. review of catchment areas (year two)
- b. review of current funding and exploration of new funding formulas (year two)
- c. determine guidelines for creation of new center(s) and expansion by branch offices (year two)
- d. determine best practice standards (year three)

**Outcome Measure:** All Colorado counties receive IL services. Information will be tracked from 704 Reports.

## **2. Coloradoans with disabilities have access to basic needs: housing, transportation,**

## **employment, and healthcare.**

**Objective 2.a:** The SILC will expand collaboration with other state and local agencies to reduce duplication of services. (ongoing)

**Activity:** The SILC will collect a comprehensive list of services provided at each IL center. (year one)

**Activity:** The SILC will explore gaps in disability services in local communities. (year two)

**Activity:** If resources become available, the SILC and DSU will develop RFPs to address gaps in services. (year three)

**Outcome Measure:** A comparison will be made between information gathered and the latest Needs Assessment and consumer surveys.

**Objective 2.b:** The SILC will gather information to promote community organizing for major disability issues in order to build local capacities for service delivery in those areas. (ongoing)

**Activity:** The SILC will host a monthly teleconference for IL staff, designated by CIL directors, and invite the participation of relevant agency representatives of the topic area. (ongoing)

**Activity:** The SILC will develop separate list serves for housing, transportation, employment, and healthcare. (ongoing)

**Activity:** The teleconference advocacy groups will identify possibilities for social change and community organizing in the areas of housing, transportation, employment, and healthcare. (ongoing)

**Activity:** The teleconference advocacy groups will work with the SILC public policy committee to develop informational briefs on the statewide impact of deficiencies in housing, transportation, employment, and healthcare for people with disabilities. Issue briefs will be posted on the SILC website. (ongoing)

**Outcome Measures:** Visits to website will be tracked. Web-based statewide surveys will inquire about increased access to areas addressed.

**Objective 2.c:** As part of the planning for network expansion, the SILC will provide access to “hot topic” training opportunities for SILC and IL staff by creating a Training and Technical Assistance resource area on the SILC website. In this area, there will be links to appropriate on-line training developed by reliable sources across the country and chosen by the SILC for their suitability. (ongoing)

**Activity:** The SILC will conduct a survey of the SILC and IL staff to identify any emerging training needs. (ongoing)

**Activity:** The SILC will provide access to “just in time” training modules on the SILC website. (ongoing)

**Outcome Measures:** Visits to website will be tracked. Use of training module will be tracked and a survey to evaluate usefulness of training opportunities will be conducted.

**Objective 2.d:** The SILC will solicit public feedback on access to basic needs and make that information available to the IL network for help in identifying service gaps and developing collaborative partnerships with other local agencies. (ongoing)

**Activity:** The SILC will develop a web-based survey system to collect data. (year two)

**Outcome Measures:** The accumulated information will provide the basis for the creation of the next SPIL.

**3. The SILC, DSU, and ACCIL work together to increase awareness of and access to independent living services for the unserved and underserved populations identified in the statewide needs assessment.**

**Objective 3.a:** The SILC, DSU and ACCIL will develop a unified message to use in marketing and advertising the availability of IL services. (year one)

**Activity:** The SILC, DSU and ACCIL will determine key audiences. (year one)

**Activity:** The SILC, DSU and ACCIL will develop key points or focus areas. (year one)

**Activity:** The SILC, DSU and ACCIL will determine most appropriate marketing methods – traditional and social. (year one)

**Activity:** The SILC will implement the marketing plan by providing marketing materials for IL centers to individualize for their local community.

**Outcome Measures:** Increased activity on SILC website. Increased number of consumers on 704 Report.

**Objective 3.b:** The SILC, DSU and ACCIL will use needs assessment data and 704 Reports to determine priorities for outreach. (ongoing)

**Activity:** The SILC, DSU and ACCIL will compare needs assessment data with 704 Reports

from all 10 centers to identify the size and location of specific unserved or underserved populations within each CIL catchment area. (ongoing)

**Outcome Measures:** outreach will be conducted in areas identified. An increase in the number of consumers in the underserved populations will increase on the 704 Report.

**Objective 3.c:** The SILC will encourage the development of cultural competency for the purpose of outreach and services to the following populations: (ongoing, based on objective 3.b)

- African American
- Deaf and hard of hearing
- Hispanic
- Native American
- Rural
- Youth

**Activity:** The SILC will identify community leaders for each unserved/underserved population. (ongoing, based on objective 3.b)

**Activity:** The SILC will enlist the help of community leaders to work with CILs to develop culturally appropriate staff training materials and outreach strategies. (ongoing)

**Activity:** The SILC will use the website to provide access to culturally appropriate materials identified or created by community leaders. (ongoing)

**Outcome Measures:** Increased numbers of ethnic and disability minorities will be documented on 704 Report.

**Objective 3.d:** The SILC will encourage IL centers to use the expertise of community leaders for training staff in cultural competence, and in developing outreach strategies and materials. (ongoing)

Outcome Measures: Increased number of ethnic minorities documented on 704 Report

#### **4. IL consumers have access to appropriate technology.**

**Objective 4.a:** The SILC will encourage the inclusion of assistive technology in independent living. (ongoing)

**Activity:** The SILC will include assistive technology information on the SILC website. (ongoing)

**Activity:** The SILC will provide web links to funding resources for AT. (ongoing)

**Objective 4.b:** The SILC will facilitate collaboration with the AT Network to develop skills and strategies for inclusion of assistive technology in IL services. (ongoing)

**Activity:** The SILC will collect materials showing the success of existing AT Network partnerships, including consumer testimonies about increased independence and make this information available on the SILC website. (year one)

**Activity:** The SILC will post free AT Network training opportunities on the SILC website. (ongoing)

- Needs assessment
- Funding
- Device demonstrations
- Learning Labs

**Objective 4.c:** The SILC will monitor the accessibility of voting options and locations across Colorado. (ongoing)

**Activity:** The SILC will gather information annually from the HAVA Program and make the information available on the SILC website. (ongoing)

**Objective 4.d:** The SILC will gain an understanding of the availability, affordability, and accessibility of broadband services across Colorado. (ongoing)

**Activity:** The SILC will gather information from the governor's IT office on the availability of broadband services across Colorado and make available on the SILC website.

**Activity:** The SILC will educate policy makers about disability accommodations necessary for broadband access (issue brief). (year two)

**Objective 4.e:** The SILC will monitor access to telecommunication options across Colorado including the telecommunications equipment distribution program. (ongoing)

**Activity:** The SILC will gather information from the disability community regarding access to, and acquisition of accessible telecommunications equipment for individuals, and make available on SILC website. (ongoing)

**Outcome Measures:** (for all objectives of this goal) Website activity will be tracked. Web-based surveys will assess increased knowledge and access to information.

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.

**During the most recent SPIL cycle, a statewide needs assessment was conducted. A demographic study was done by the National Disability Statistics division of NIDRR; a qualitative study was done by contract with professional researchers; and a directory was compiled of statewide disability-specific organizations. The needs assessment pointed out that nearly all Coloradoans with disabilities are currently underserved due to the geographic diversity of the state and the limited resources of the ten centers for independent living.**

**Within those parameters, the demographic study was compared with the demographic section of the 704 Report to determine the populations most in need. As stated in SPIL goal 3, these are:**

- African American
- Deaf and hard of hearing
- Hispanic
- Native American
- Rural
- Youth

**Although the African-American and Hispanic populations fare well in most metro areas of the state, they are under-represented in rural and mountain communities and in Larimer county. The Native American population is primarily located in the southwest corner of the state where our smallest CIL operates just outside one of the reservations. There are about ten counties on the Eastern Plains and in the mountain area that receive little, or no, IL services. Some of these counties are designated as “frontier,” having populations of less than 1,000. The deaf and hard of hearing community and our youth with disabilities have expressed their desire for better access to IL services through focus groups and public comment.**

**The SILC is starting outreach efforts by becoming members of ethnic Chambers of Commerce to demonstrate sincerity in reaching those populations. Through those affiliations, contacts will be made to assist in developing culturally competent trainings that will be offered to CILs for use in their outreach.**

**The information collected on disability-specific organizations will be used to hold focus groups at annual meetings of those organizations throughout the period of the SPIL. We hope to collect better information about the needs of people with significant disabilities who are not receiving adequate service, and use that information to assist the centers in the development of programs and services that will attract the attention of those populations.**

**The SILC hopes to recruit a member who is already involved with youth with disabilities. Other new recruits will hopefully represent ethnic minorities and under-represented disabilities.**

**Using information gathered in Goal 4, the SILC, DSU and ACCIL will explore using internet and other technologies to reach potential consumers in frontier counties.**

**As information, trainings, and materials are gathered, all will be made available on the SILC website so that centers can make use of whatever is most appropriate for their outreach needs.**

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

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

1.3A Financial Plan Tables

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

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

**Year 1**

<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	\$282,983		
Chapter 1, Part C			\$1,003,796	
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$48,500			
Other (ARRA)		\$220,000	\$273,363	
<b>Non-Federal</b>				

<b>Funds</b>				
State Funds		\$1,457,604		
Other				

**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	\$50,000	\$282,983		
Chapter 1, Part C			1,052,152	
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				
<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$69,500			
Other (ARRA)			\$273,363	
<b>Non-Federal Funds</b>				
State Funds		\$1,457,604		
Other				

**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	\$52,000	\$282,983		
Chapter 1, Part C			1,052,152	
Chapter 2, OIB (only those provided by the OIB grantee to further a SPIL objective)				



<b>Other Federal Funds</b>				
Sec. 101(a)(18) of the Act (Innovation and Expansion)	\$66,000			
Other (ARRA)			\$273,363	
<b>Non-Federal Funds</b>				
State Funds		\$1,457,604		
Other				

### 1.3B Financial Plan Narratives

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

**The ten centers for independent living receive funding through the CILCS program described below. These funds ensure the delivery of core services described in the SPIL objectives. Many objectives of this SPIL are supported by the SILC. The SILC Coordinator, paid from Part B funds, oversees the SILC’s implementation of the objectives. The SILC’s operating budget is used to maintain the SILC website which plays a significant role in meeting most objectives. The SILC also provides funds for monthly teleconferences described in the community organizing objectives.**

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

**Currently, Part B funds provide \$30,000 for a SILC Coordinator. The remaining Part B funds are combined with the State General Fund allocation to support the Colorado Independent Living Core Services (CILCS) program. These funds are allocated to all ten Colorado centers for independent living, six Part C centers and four state funded centers. There are two components to the allocation. State General Funds are divided equally among all 10 centers. Part B funds are allocated based on a three-tier system developed to offset the disparities in Part C and local funding. This allocation process is described in the State IL Rules. In order to receive CILCS funding, all centers must be currently certified in compliance with State IL Rules.**

**State General Funds for each center are approximately \$145,760.**

**Part B funds are distributed as follows:**

*Tier 1* includes centers which will each receive 3.06% of the total amount of Part B funds available .

**Atlantis, CPWD**

*Tier 2* includes centers which will each receive 9.89% of the total amount of Part B funds available.

**CSIC, CFI, DCIL and DRS**

*Tier 3* includes centers which will each receive 13.58% of available Part B funds.

## **ILC Craig, SWCI, Connections, and CFD**

**Additionally, during the first year of the SPIL, the four centers that receive no Part C funds ( Disabled Resource Services, Colorado Springs Independence Center, Independent Life Center, Southwest Center for Independence), will each receive \$55,000 in Part B ARRA funds. All four centers have submitted work plans for Capacity Building, one of three service areas approved by the SILC and DSU for Part B ARRA expenditures. The six Part C centers (Atlantis Community, Center for Disabilities, Center for Independence, Center for People with Disabilities, Connections for Independent Living, Disability Center for Independent Living) will receive \$273,363 annually in ARRA funds. The distribution of these funds parallels the percentage of the total Part C funding currently received by each Part C center in the regular annual allocation.**

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

**Not applicable.**

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

**Subsequent to conversations with RSA during Colorado DVR's monitoring visit, it is likely that a new funding allocation process will be implemented during the course of this SPIL. The centers included in each tier of the tiered system are based on information available in 2002. The allocation process is included in Colorado's State IL Rules and does not allow for changes without a change in IL Rule. In addition, billing and payment for the CILCS program does not allow for determining which services are performed using Part B dollars and which are linked to state funding. The change in the IL Rules and the subsequent changes in the funding process will take nearly a year to implement. These changes will be linked to the objectives of this plan that involve provision of services to unserved and underserved populations. We are aware that a SPIL amendment will be necessary to move forward with a new allocation process.**

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

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

**The objectives of this SPIL rely heavily on consumer control and consumer participation. The primary areas of focus were identified through a statewide needs assessment that included current IL consumers, potential consumers, and key informants. Further objectives were developed with the input of IL directors and consumers. The areas of concentration identified are consistent with services listed in Chapter 1, and can be carried out via the independent living program structure. In addition to reinforcing the four core services, the SPIL objectives require collaboration of all parties, including other**

**organizations that serve people with disabilities.**

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.

**A review of the IL work plans in the most recent 704 Reports show a major concern for consumer access to basic needs in today's economy. It was also clear that collaboration has become more necessary than ever before. As to the underserved populations to be targeted, these are populations that centers have consistently designated as hard to reach. It is our expectation that our SPIL objectives will help us develop outreach methods that can be used across the state to get to these hard to reach consumers.**

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

Describe the steps that will be taken to maximize the cooperation, coordination and working relationships among the SILS program, the SILC, and centers; the DSU, other State agencies represented on the SILC and other councils that address the needs of specific disability populations and issues; and other public and private entities determined to be appropriate by the SILC.

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

**The SILC and DSU recognize the need for increased cooperation and collaboration to achieve the goals and objectives of the plan. There is a plan in place to hold a meeting before the beginning of the new federal fiscal year to discuss the roles of the SILC, DSU and Association of Colorado Centers for Independent Living (ACCIL) and to develop ways to improve ongoing communications. We plan to work more closely with both the Colorado Commission for the Deaf and the Colorado Commission for People who are Blind or Visually Impaired to gain a better understanding of the most appropriate outreach and services. The Colorado Cross Disability Coalition (CCDC) will play a role in helping us connect advocacy groups across the state to develop more effective means of community organizing. Assistive Technology Partners will be key in reaching our goal for access to technology. We will also be working closely with the Area Agencies on Aging and the ADRCs in reaching out to our aging population with disabilities. The recent statewide needs assessment included the development of a directory of statewide disability-specific organizations that was used for scheduling key informant interviews, and will be used to forge better relationships with those groups over the period of the SPIL.**

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.

**There are objectives and activities in this SPIL that drive us toward more collaboration and less duplication. Funds for the SILS program are used for core services that are rarely offered by non- IL organizations. The OIB funds are used on four contract priorities developed to promote independent living and avoid duplicate existing services for blind and visually impaired seniors.**

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 none at this time.**

**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: 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			
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	

<b>Table 2.1A: 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 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	X	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
Training to develop skills specifically designed for youths who are individuals with significant disabilities to promote self-awareness and esteem, develop advocacy and self-empowerment skills, and explore career options			
Services for children with significant disabilities			
Services under other Federal, State, or local programs designed to provide resources, training, counseling, or other assistance of substantial benefit in enhancing the independence, productivity, and quality of life of individuals with significant disabilities		X	X
Appropriate preventive services to decrease the need of individuals with significant disabilities for similar services in the future			X

<b>Table 2.1A: 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>
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.

**The SILC, DSU and ACCIL are working together to reach out to unserved and underserved populations as described earlier. The expectation is that new service areas will emerge as we work through the outreach plan. For instance, a “Deaf Ambassador Program” has been proposed by a member of the Colorado Commission for the Deaf and Hard of Hearing. Members of that commission would act as liaisons between potential consumers and their local IL center, providing up-front interpreting for introductions and intakes. As we reach out to other populations, similar ideas are expected to emerge.**

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

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

Indicate N/A if not applicable.

NA

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

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

**Not applicable.**

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.

NA

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

### 3.1 Existing Network – 34 CFR 364.25

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

**All ten centers for independent living provide cross-disability services. Depending on their location within the state, underserved populations include: people who are deaf, people of color, youth, and people with disabilities in extremely rural communities. All counties of the state have been divided among the ten centers in a plan created by the Association of Colorado Centers for Independent Living (ACCIL).**

#### **PART C CENTERS:**

**Atlantis Community, Inc., Denver  
Center for Disabilities, Pueblo  
Center for Independence, Grand Junction  
Center for People with Disabilities, Boulder  
Connections for Independent Living, Greeley  
Disability Center for Independent Living, Denver**

#### **STATE-FUNDED CENTERS**

**Colorado Springs Independence Center, Colorado Springs  
Disabled Resource Services, Fort Collins  
Independent Life Center, Craig  
Southwest Center for Independence, Durango**

### 3.2 Expansion of Network – 34 CFR 364.25

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

**Our statewide needs assessment shows that all areas of the state are underfunded. The virtual application of a data-driven funding formula has provided good information about the costs associated with each catchment area. As stated in the Goals section, the catchment areas will be reviewed and possibly restructured for better coverage. At this time, the SILC, DSU and ACCIL are investigating whether the state is best served by opening new centers, or by encouraging existing centers to open well-staffed branch offices in areas identified as unserved/underserved.**

**Of primary concern is the large number of southern counties served by only two centers. Also, there are no centers located on the Eastern Plains, and although several centers attempt to provide service, the area is thinly populated and spread out over many miles. We are investigating unique solutions to serving this hard to reach population.**

**If additional funding becomes available, during this SPIL cycle, it will be used to further the existing centers' ability to serve the unserved/underserved populations in their**

**catchment areas. Although establishing a new center is not entirely out of the question, that decision will be based on the outcome of jointly reviewing the needs assessment and reviewing the current catchment areas. The decision to open a new center could not be made without the expectation of ongoing funds of at least \$300,000 per year.**

3.3 Section 723 States Only – 34 CFR 364.39

**NA**

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: Designated State Unit (DSU)**

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

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

**The DSU employs a .5 FTE Program Assistant to provide support to the SILC. 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 provides, by contract, a SILC Coordinator responsible for supporting the SILC in achieving the goals and objectives of the state plan. The job description is revised 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 quarterly newsletter is produced and distributed to all parties.**

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

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

5.1 Resource plan – 34 CFR 364.21(i)

5.1A Describe the resource plan prepared by the SILC in conjunction with the DSU for the provision of resources, including staff and personnel, made available under parts B and C of



chapter 1 of title VII, section 101(a)(18) of the Act, and from other public and private sources that may be necessary to carry out the functions of the SILC identified in section 705(c). The description must address the three years of this SPIL.

The SILC Resource plan is funded through two sources: Division of Vocational Rehabilitation and Part B under Title VII of the Rehabilitation Act. Under the General fund, the SILC has received \$48,500 annually for at least two SPILs or six years. These funds are used to support the operating expenses of the SILC. In addition the SILC receives \$30,000 from Part B which funds the part time coordinator who is a consultant on contract. This amount has not changed over at least two SPIL cycles either.

The SILC does not have an office or office related expenses except those that are incurred by the DSU on the SILC's behalf. The consultant works from his/her own space and uses his/her personal laptop and other equipment. Much of the work is done by committee using teleconferencing and at the 4-5 formal meetings that the SILC conducts in various parts of the state.

The SILC Finance committee met in Colorado Springs to set the budget for the next three year cycle of the SPIL. While the first year is based on the same numbers, in year 2 and 3 we are requesting additional funds to continue and expand our work on behalf of Coloradoans with disabilities.

### **Year 1**

#### **Personnel**

##### **Consultant**

**\$30,000**

The contract consultant will remain a part time consultant at \$30,000 annually. This amount will cover consultants time (20 hours a week), office expenses and work related travel OTHER than travel to formal SILC meetings. Travel to formal SILC meetings will be covered in the operating budget.

##### **Administrative Support**

**in-kind**

A part time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings and paying the bills of the SILC. The Division of Vocational Rehabilitation provides administrative support through its existing staff.

##### **Total Personnel**

**\$30,000**

#### **Operating Expenses**

##### **Professional Services**

**\$11,000**

This line item is made up of three expenses. First, a new contract to maintain the SILC's website will be awarded by October 1, 2010. It is anticipated to cost \$5000 for that annual service.

Second, the SILC has engaged the services of a communications consultant to help the SILC, DSU and the state CIL association to develop a unified message about Independent Living as a part of our outreach to unserved and underserved communities. That contractor has developed a plan of action during the previous SPIL. Under this new SPIL cycle she will continue to work with the three entities to implement the plan. This year's cost for the communications consultant

is projected to be \$3000.

Third, the SILC has begun an effective issue brief advocacy project that entails researching, discussing and writing issue briefs on issues that affect the disability community in Colorado. The Public Policy Committee uses the services of a professional, disability-based writer to produce 2-3 issue briefs a year. This year the SILC anticipates three briefs at a cost of \$3000.

**Travel** **\$15,000**

This line item is used to pay for the travel of SILC members and the Coordinator to formal SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per diem costs.

**Meetings** **\$5000**

This line item pays for the meeting costs such as room rental, food costs for the all day meetings, telephone line and speaker phone rentals as well as projector costs as needed.

**Program Accommodations** **\$5000**

This line item funds disability based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings.

**Operating Costs** **\$7000**

The bulk of this line item, \$6000 is used to pay for the conference calls that the committees use to accomplish their work. We also anticipate printing up several major issue briefs for distribution for \$1000.

**Training funds** **\$1,000**

These funds will be used to provide training for SILC members and others, primarily through teleconference training provided through the SILCNet. These training sessions are geared toward SILC issues and Center service issues. Where possible, the SILC intends to either provide a link to or copy training through the website so that it is widely available to SILC members, Center staff and others.

**Conferences** **\$3000**

The SILC prefers to send two people to the SILC Congress and NCIL conferences but our state fiscal policy dictates that, at this time, we can only send one. It is beneficial to send both the SILC Coordinator and the Chair. However, we will send one to each conference. The SILC Congress is being held in Orlando and projected to cost \$1000. The NCIL conference is in DC and also projected to cost \$2000.

**Dues** **\$ 500**

This line item is to pay for dues in such organizations as NCIL and minority chambers of commerce.

**Miscellaneous** **-0-**

The SILC does not anticipate any miscellaneous costs at this time.

**Needs Assessment****\$1000**

The SILC has determined that the work of collecting information on un and underserved communities and their needs should occur across the span of the three year SPIL instead of just the third year. This year the SILC will host up to 2 focus groups in un or underserved geographic or disability specific areas. The SILC also anticipates using Internet-based, accessible survey software to gather information from a variety of other respondents that are involved in independent living.

**Total Operating Costs for Year 1****\$48,500****YEAR 2**

This year the SILC anticipates having a full time SILC Coordinator, increase professional services, add new members which will increase travel and meeting costs, send more people to conferences and, if funds are available, offer requests for proposals for small grants to fill gaps in services across the state.

**Personnel****SILC Coordinator****\$50,000**

This position will remain a contract position but the expectation is that the consultant will go to full time at \$50,000. The SILC expects that this person will attend meetings in Denver and be the “face of the SILC.” In addition, he/she will develop content for the SILC website, assist with the development of additional issue briefs, conduct on going needs assessment activities and support additional SILC committees/workgroups on specific issues such as emergency preparedness, housing, assistive technology, transportation and access to basic services such as food and emergency/temporary housing.

**Administrative Assistant****in-kind**

A part time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings and paying the bills of the SILC. The Division of Vocational Rehabilitation provides administrative support through its existing staff.

**Total Personnel****\$50,000****Operating Expenses****Professional Services****\$23,000**

This line item is made up of four expenses. First, we anticipate a migration to a new website that focuses on Independent Living rather than just the SILC or the ACCIL. Information from those two websites will be combined along with information from the DSU to showcase IL in Colorado. This is a part of the communications plan and is projected to cost \$7500.

Second, the SILC anticipates continuing the contract with a communications consultant to help the SILC, DSU and the state CIL association to disseminate a unified message about

Independent Living as a part of our outreach to unserved and underserved communities. All three entities will be involved and work together toward this goal. This year's cost for the communications consultant is projected to be \$7500.

Third, the SILC anticipates continuing an effective issue brief advocacy project that entails researching, discussing and writing issue briefs on issues that affect the disability community in Colorado. The Public Policy Committee uses the services of a professional, disability-based writer to produce 2-3 issue briefs a year. This year the SILC anticipates three new briefs at a cost of \$3000.

Forth, during this year, the SILC will work with the ACCIL and the DSU to review and refine the catchment areas of the CILs. A consultant to facilitate the meetings, pull together research and make preliminary recommendations will be needed at a cost of \$5000.

**Travel** **\$18,000**

The SILC intends to increase the membership of the SILC to include several un or under-represented geographic areas and/or disability groups. *The number of members should grow from 12 to 15.* This line item is used to pay for the travel of SILC members and the Coordinator to formal SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per diem costs.

**Meetings** **\$5000**

This line item pays for the meeting costs such as room rental, food costs for the all day meetings, telephone line, speaker phone, projector or other rental costs as needed.

**Program Accommodations** **\$5000**

This line item funds disability based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings. This year's budget has increased by \$1000 in anticipation of at least three new members.

**Operating Costs** **\$7000**

The bulk of this line item, \$6000 is used to pay for the conference calls that the committees use to accomplish their work. We also anticipate printing up several major issue briefs for distribution for \$1000. The SILC does not anticipate an increase in this line item from last year.

**Training funds** **\$1,500**

These funds will be used to provide training for SILC members and others, primarily through teleconference training provided through the SILCNet. These training sessions are geared toward SILC issues and Center service issues. Where possible, the SILC intends to either provide a link to or copy training through the website so that it is widely available to SILC members, Center staff and others. This line item has increased by \$500 from Year 1 to include training for new members.

**Conferences** **\$6000**

The SILC prefers to send two people to the SILC Congress and NCIL conferences as it is beneficial to send both the SILC Coordinator and the Chair. In Year 2, the SILC anticipates that the Governor will lift travel restrictions to allow this. The SILC Congress is projected to cost \$3000 (two people). The NCIL conference is in DC and also projected to cost \$3000 (two people).

**Dues** **\$1000**

This line item is to pay for dues in such organizations as NCIL or APRIL. In addition, this year the SILC anticipates joining and participating in two of three minority chambers of commerce in order to learn about those communities, educate about the SILC’s mission and recruit for new members from those communities.

**Miscellaneous** **\$1000**

This line item covers unanticipated costs.

**Needs Assessment** **\$2000**

The SILC has determined that the work of collecting information on unserved and underserved communities and their needs should occur across the span of the three year SPIL instead of just the third year. This year the SILC will host up to 3 focus groups in un or underserved geographic or disability specific areas. The SILC also anticipates using Internet-based, accessible survey software to gather information from a variety of other respondents that are involved in independent living.

**Total Operating Costs for Year 2** **\$69,500**

**YEAR 3**

This year the SILC anticipates having a full time administrative assistant to assist the SILC Coordinator in fulfilling the goals of the council. Professional Services should decrease as the website and unified messaging projects costs decrease after start up. In addition, travel expenses could rise due to increased pricing. The Needs Assessment line item will go up to cover costs of research for the next SPIL. Development of the next SPIL will add some costs as well.

**Personnel**

**SILC Coordinator** **\$52,000**

This position will remain a full time contract position and if performance warrants it, the SILC anticipates providing a raise of \$2,000. The SILC expects that this person will attend meetings in Denver and be the “face of the SILC.” In addition, he/she will develop content for the SILC website, assist with the development of additional issue briefs, conduct on going needs assessment activities and support additional SILC committees/workgroups on specific issues such as emergency preparedness, housing, assistive technology, transportation and access to basic services such as food and emergency/temporary housing.

**Administrative Assistant** **in-kind**

A full time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings, paying the bills of the SILC and will assist with the development of

content with the website and assist with providing minutes support to the committees. The Division of Vocational Rehabilitation provides administrative support through its existing staff.

**Total Personnel** **\$52,000**

**Operating Expenses**

**Professional Services** **\$15,500**

This line item goes back to three expenses. First, we anticipate that the website maintenance will go to a maintenance level after the start up costs that were covered in Year 2. This is a part of the on-going communications plan and is projected to go back to a cost of \$5000.

Second, the SILC anticipates continuing the contract with a communications consultant to help the SILC, DSU and the state CIL association to disseminate a unified message about Independent Living as a part of our outreach to unserved and underserved communities. All three entities will be involved and work together toward this goal. The third year's cost for the communications consultant is projected to be \$7500.

Third, the SILC anticipates continuing an effective issue brief advocacy project that entails researching, discussing and writing issue briefs on issues that affect the disability community in Colorado. The Public Policy Committee uses the services of a professional, disability-based writer to produce 2-3 issue briefs a year. This year the SILC anticipates three new briefs at a cost of \$3000. This cost has remained the same across the cycle of the 2010-2012 SPIL.

**Travel** **\$20,000**

The SILC intends to increase the membership of the SILC to include several unserved or under-represented geographic areas and/or disability groups. The number of members should grow from 15 to 17 and cost of travel may increase. This line item is used to pay for the travel of SILC members and the Coordinator to formal SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per diem costs.

**Meetings** **\$5000**

This line item pays for the meeting costs such as room rental, food costs for the all day meetings, telephone line and speaker phone rentals as well as projector costs as needed.

**Program Accommodations** **\$5000**

This line item funds disability based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings.

**Operating Costs** **\$7000**

The bulk of this line item, \$6000 is used to pay for the conference calls that the committees use to accomplish their work. We also anticipate printing up several major issue briefs for distribution for \$1000. The SILC does not anticipate an increase in this line item from the past

two years.

**Training funds**

**\$1,500**

These funds will be used to provide training for SILC members and others, primarily through teleconference training provided through the SILCNet. These training sessions are geared toward SILC issues and Center service issues. Where possible, the SILC intends to either provide a link to or copy training through the website so that it is widely available to SILC members, Center staff and others. This line item has increased by \$500 from Year 1 to include training for new members.

**Conferences**

**\$6000**

The SILC prefers to send two people to the SILC Congress and NCIL conferences as it is beneficial to send both the SILC Coordinator and the Chair. In Year 3, the SILC anticipates that the Governor will continue to allow out of state travel. The SILC Congress is projected to cost \$3000 (two people). The NCIL conference is in DC and also projected to cost \$3000 (two people).

**Dues**

**\$1000**

This line item is to pay for dues in such organizations as NCIL or APRIL. In addition, this year the SILC anticipates joining and participating in two of three minority chambers of commerce in order to learn about those communities, educate about the SILC's mission and recruit for new members from those communities.

**Miscellaneous**

**\$1000**

This line item covers unanticipated costs.

**Needs Assessment**

**\$3000**

The SILC has determined that the work of collecting information on un and underserved communities and their needs should occur across the span of the three year SPIL instead of just the third year. In this third year the SILC will host up to 4 focus groups in un or underserved geographic or disability specific areas to get input for the new SPIL. The SILC also anticipates using Internet-based, accessible survey software to gather information from a variety of other respondents that are involved in independent living.

**State Plan Costs**

**\$1000**

This line item will cover the costs of extra outreach and communication around the development of the new SPIL.

**Special Projects**

Should funding become available, the SILC would activate two special projects.

The SILC Resource plan is funded through two sources: Division of Vocational Rehabilitation and Part B under Title VII of the Rehabilitation Act. Under the General fund, the SILC has received \$48,500 annually for at least two SPILs or six years. These funds are used to support the operating expenses of the SILC. In addition the SILC receives \$30,000 from Part B which funds the part time coordinator who is a consultant on contract. This amount has not changed over at least two SPIL cycles either.

The SILC does not have an office or office related expenses except those that are incurred by the

DSU on the SILC's behalf. The consultant works from his/her own space and uses his/her personal laptop and other equipment. Much of the work is done by committee using teleconferencing and at the 4-5 formal meetings that the SILC conducts in various parts of the state.

The SILC Finance committee met in Colorado Springs to set the budget for the next three year cycle of the SPIL. While the first year is based on the same numbers, in year 2 and 3 we are requesting additional funds to continue and expand our work on behalf of Coloradoans with disabilities.

## **Year 1**

### **Personnel**

#### **Consultant**

**\$30,000**

The contract consultant will remain a part time consultant at \$30,000 annually. This amount will cover consultants time (20 hours a week), office expenses and work related travel OTHER than travel to formal SILC meetings. Travel to formal SILC meetings will be covered in the operating budget.

#### **Administrative Support**

**in-kind**

A part time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings and paying the bills of the SILC. The Division of Vocational Rehabilitation provides administrative support through its existing staff.

#### **Total Personnel**

**\$30,000**

### **Operating Expenses**

#### **Professional Services**

**\$11,000**

This line item is made up of three expenses. First, a new contract to maintain the SILC's website will be awarded by October 1, 2010. It is anticipated to cost \$5000 for that annual service.

Second, the SILC has engaged the services of a communications consultant to help the SILC, DSU and the state CIL association to develop a unified message about Independent Living as a part of our outreach to unserved and underserved communities. That contractor has developed a plan of action during the previous SPIL. Under this new SPIL cycle she will continue to work with the three entities to implement the plan. This year's cost for the communications consultant is projected to be \$3000.

Third, the SILC has begun an effective issue brief advocacy project that entails researching, discussing and writing issue briefs on issues that affect the disability community in Colorado. The Public Policy Committee uses the services of a professional, disability-based writer to produce 2-3 issue briefs a year. This year the SILC anticipates three briefs at a cost of \$3000.

#### **Travel**

**\$15,000**

This line item is used to pay for the travel of SILC members and the Coordinator to formal SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per diem costs.



**Meetings** **\$5000**  
This line item pays for the meeting costs such as room rental, food costs for the all day meetings, telephone line and speaker phone rentals as well as projector costs as needed.

**Program Accommodations** **\$5000**  
This line item funds disability based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings.

**Operating Costs** **\$7000**  
The bulk of this line item, \$6000 is used to pay for the conference calls that the committees use to accomplish their work. We also anticipate printing up several major issue briefs for distribution for \$1000.

**Training funds** **\$1,000**  
These funds will be used to provide training for SILC members and others, primarily through teleconference training provided through the SILCNet. These training sessions are geared toward SILC issues and Center service issues. Where possible, the SILC intends to either provide a link to or copy training through the website so that it is widely available to SILC members, Center staff and others.

**Conferences** **\$3000**  
The SILC prefers to send two people to the SILC Congress and NCIL conferences but our state fiscal policy dictates that, at this time, we can only send one. It is beneficial to send both the SILC Coordinator and the Chair. However, we will send one to each conference. The SILC Congress is being held in Orlando and projected to cost \$1000. The NCIL conference is in DC and also projected to cost \$2000.

**Dues** **\$ 500**  
This line item is to pay for dues in such organizations as NCIL and minority chambers of commerce.

**Miscellaneous** **-0-**  
The SILC does not anticipate any miscellaneous costs at this time.

**Needs Assessment** **\$1000**  
The SILC has determined that the work of collecting information on un and underserved communities and their needs should occur across the span of the three year SPIL instead of just the third year. This year the SILC will host up to 2 focus groups in un or underserved geographic or disability specific areas. The SILC also anticipates using Internet-based, accessible survey software to gather information from a variety of other respondents that are involved in independent living.

**Total Operating Costs for Year 1** **\$48,500**

## **YEAR 2**

This year the SILC anticipates having a full time SILC Coordinator, increase professional services, add new members which will increase travel and meeting costs, send more people to conferences and, if funds are available, offer requests for proposals for small grants to fill gaps in services across the state.

### **Personnel**

#### **SILC Coordinator**

**\$50,000**

This position will remain a contract position but the expectation is that the consultant will go to full time at \$50,000. The SILC expects that this person will attend meetings in Denver and be the “face of the SILC.” In addition, he/she will develop content for the SILC website, assist with the development of additional issue briefs, conduct on going needs assessment activities and support additional SILC committees/workgroups on specific issues such as emergency preparedness, housing, assistive technology, transportation and access to basic services such as food and emergency/temporary housing.

#### **Administrative Assistant**

**in-kind**

A part time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings and paying the bills of the SILC. The Division of Vocational Rehabilitation provides administrative support through its existing staff.

#### **Total Personnel**

**\$50,000**

### **Operating Expenses**

#### **Professional Services**

**\$23,000**

This line item is made up of four expenses. First, we anticipate a migration to a new website that focuses on Independent Living rather than just the SILC or the ACCIL. Information from those two websites will be combined along with information from the DSU to showcase IL in Colorado. This is a part of the communications plan and is projected to cost \$7500.

Second, the SILC anticipates continuing the contract with a communications consultant to help the SILC, DSU and the state CIL association to disseminate a unified message about Independent Living as a part of our outreach to unserved and underserved communities. All three entities will be involved and work together toward this goal. This year’s cost for the communications consultant is projected to be \$7500.

Third, the SILC anticipates continuing an effective issue brief advocacy project that entails researching, discussing and writing issue briefs on issues that affect the disability community in Colorado. The Public Policy Committee uses the services of a professional, disability-based writer to produce 2-3 issue briefs a year. This year the SILC anticipates three new briefs at a cost of \$3000.

Forth, during this year, the SILC will work with the ACCIL and the DSU to review and refine the catchment areas of the CILs. A consultant to facilitate the meetings, pull together research

and make preliminary recommendations will be needed at a cost of \$5000.

**Travel** **\$18,000**

The SILC intends to increase the membership of the SILC to include several un or under-represented geographic areas and/or disability groups. *The number of members should grow from 12 to 15.* This line item is used to pay for the travel of SILC members and the Coordinator to formal SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per diem costs.

**Meetings** **\$5000**

This line item pays for the meeting costs such as room rental, food costs for the all day meetings, telephone line, speaker phone, projector or other rental costs as needed.

**Program Accommodations** **\$5000**

This line item funds disability based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings. This year's budget has increased by \$1000 in anticipation of at least three new members.

**Operating Costs** **\$7000**

The bulk of this line item, \$6000 is used to pay for the conference calls that the committees use to accomplish their work. We also anticipate printing up several major issue briefs for distribution for \$1000. The SILC does not anticipate an increase in this line item from last year.

**Training funds** **\$1,500**

These funds will be used to provide training for SILC members and others, primarily through teleconference training provided through the SILCNet. These training sessions are geared toward SILC issues and Center service issues. Where possible, the SILC intends to either provide a link to or copy training through the website so that it is widely available to SILC members, Center staff and others. This line item has increased by \$500 from Year 1 to include training for new members.

**Conferences** **\$6000**

The SILC prefers to send two people to the SILC Congress and NCIL conferences as it is beneficial to send both the SILC Coordinator and the Chair. In Year 2, the SILC anticipates that the Governor will lift travel restrictions to allow this. The SILC Congress is projected to cost \$3000 (two people). The NCIL conference is in DC and also projected to cost \$3000 (two people).

**Dues** **\$1000**

This line item is to pay for dues in such organizations as NCIL or APRIL. In addition, this year the SILC anticipates joining and participating in two of three minority chambers of commerce in order to learn about those communities, educate about the SILC's mission and recruit for new members from those communities.

**Miscellaneous** **\$1000**

This line item covers unanticipated costs.

**Needs Assessment** **\$2000**

The SILC has determined that the work of collecting information on unserved and underserved communities and their needs should occur across the span of the three year SPIL instead of just the third year. This year the SILC will host up to 3 focus groups in un or underserved geographic or disability specific areas. The SILC also anticipates using Internet-based, accessible survey software to gather information from a variety of other respondents that are involved in independent living.

**Total Operating Costs for Year 2** **\$69,500**

**YEAR 3**

This year the SILC anticipates having a full time administrative assistant to assist the SILC Coordinator in fulfilling the goals of the council. Professional Services should decrease as the website and unified messaging projects costs decrease after start up. In addition, travel expenses could rise due to increased pricing. The Needs Assessment line item will go up to cover costs of research for the next SPIL. Development of the next SPIL will add some costs as well.

**Personnel**

**SILC Coordinator** **\$52,000**

This position will remain a full time contract position and if performance warrants it, the SILC anticipates providing a raise of \$2,000. The SILC expects that this person will attend meetings in Denver and be the “face of the SILC.” In addition, he/she will develop content for the SILC website, assist with the development of additional issue briefs, conduct on going needs assessment activities and support additional SILC committees/workgroups on specific issues such as emergency preparedness, housing, assistive technology, transportation and access to basic services such as food and emergency/temporary housing.

**Administrative Assistant** **in-kind**

A full time administrative assistant will provide services to the SILC. This person is responsible for setting up meetings, paying the bills of the SILC and will assist with the development of content with the website and assist with providing minutes support to the committees. The Division of Vocational Rehabilitation provides administrative support through its existing staff.

**Total Personnel** **\$52,000**

**Operating Expenses**

**Professional Services** **\$15,500**

This line item goes back to three expenses. First, we anticipate that the website maintenance will go to a maintenance level after the start up costs that were covered in Year 2. This is a part of the on-going communications plan and is projected to go back to a cost of \$5000.

Second, the SILC anticipates continuing the contract with a communications consultant to help the SILC, DSU and the state CIL association to disseminate a unified message about Independent Living as a part of our outreach to unserved and underserved communities. All three entities will be involved and work together toward this goal. The third year's cost for the communications consultant is projected to be \$7500.

Third, the SILC anticipates continuing an effective issue brief advocacy project that entails researching, discussing and writing issue briefs on issues that affect the disability community in Colorado. The Public Policy Committee uses the services of a professional, disability-based writer to produce 2-3 issue briefs a year. This year the SILC anticipates three new briefs at a cost of \$3000. This cost has remained the same across the cycle of the 2010-2012 SPIL.

**Travel**

**\$20,000**

The SILC intends to increase the membership of the SILC to include several unserved or under-represented geographic areas and/or disability groups. The number of members should grow from 15 to 17 and cost of travel may increase. This line item is used to pay for the travel of SILC members and the Coordinator to formal SILC meetings held across the state. It is also used to pay for committees, focus groups and outreach meetings that SILC members attend across the state. Costs include mileage and other travel costs (cab, train, bus, van, and on rare occasions air travel); hotel charges; and per diem costs.

**Meetings**

**\$5000**

This line item pays for the meeting costs such as room rental, food costs for the all day meetings, telephone line and speaker phone rentals as well as projector costs as needed.

**Program Accommodations**

**\$5000**

This line item funds disability based accommodations needed by members or other participants to fully participate in our meetings both face to face and by telephone. Costs include sign language interpreters, alternate print and personal assistance needs to travel and participate in SILC meetings.

**Operating Costs**

**\$7000**

The bulk of this line item, \$6000 is used to pay for the conference calls that the committees use to accomplish their work. We also anticipate printing up several major issue briefs for distribution for \$1000. The SILC does not anticipate an increase in this line item from the past two years.

**Training funds**

**\$1,500**

These funds will be used to provide training for SILC members and others, primarily through teleconference training provided through the SILCNet. These training sessions are geared toward SILC issues and Center service issues. Where possible, the SILC intends to either provide a link to or copy training through the website so that it is widely available to SILC members, Center staff and others. This line item has increased by \$500 from Year 1 to include training for new members.

**Conferences**

**\$6000**

The SILC prefers to send two people to the SILC Congress and NCIL conferences as it is

beneficial to send both the SILC Coordinator and the Chair. In Year 3, the SILC anticipates that the Governor will continue to allow out of state travel. The SILC Congress is projected to cost \$3000 (two people). The NCIL conference is in DC and also projected to cost \$3000 (two people).

**Dues**

**\$1000**

This line item is to pay for dues in such organizations as NCIL or APRIL. In addition, this year the SILC anticipates joining and participating in two of three minority chambers of commerce in order to learn about those communities, educate about the SILC's mission and recruit for new members from those communities.

**Miscellaneous**

**\$1000**

This line item covers unanticipated costs.

**Needs Assessment**

**\$3000**

The SILC has determined that the work of collecting information on un and underserved communities and their needs should occur across the span of the three year SPIL instead of just the third year. In this third year the SILC will host up to 4 focus groups in un or underserved geographic or disability specific areas to get input for the new SPIL. The SILC also anticipates using Internet-based, accessible survey software to gather information from a variety of other respondents that are involved in independent living.

**State Plan Costs**

**\$1000**

This line item will cover the costs of extra outreach and communication around the development of the new SPIL.

**Special Projects**

Should funding become available, the SILC would activate two special projects.

1. Put out requests for proposals (RFPs) for meeting gaps in services, (examples include: deaf ambassador program, local transportation advocacy, food bank access and community organizing) in specific communities across the state. These RFPs would range from \$1000 to \$7,500 or more, depending on funds, and would be available to individuals, community groups and Centers.
2. Telephone survey of representative sample of persons with disabilities in Colorado to inquire about disability impacts and needs, community access and work issues. Projected cost: \$20-30K

**Total Operating Costs for Year 3**  
*(without special projects)*

**\$66,000**

1. Put out requests for proposals (RFPs) for meeting gaps in services, (examples include: deaf ambassador program, local transportation advocacy, food bank access and community organizing) in specific communities across the state. These RFPs would range from \$1000 to \$7,500 or more, depending on funds, and would be available to individuals, community groups and Centers.

2. Telephone survey of representative sample of persons with disabilities in Colorado to inquire about disability impacts and needs, community access and work issues. Projected cost: \$20-30K

**Total Operating Costs for Year 3**  
*(without special projects)*

**\$66,000**

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 SILC finance committee develops an annual line item budget, allocating adequate resources for meeting expenses, training, conferences, and meeting objectives of the SPIL. The budget is reviewed monthly by the finance committee, chaired by the SILC treasurer. A report of expenditures is furnished by the DSU Program Assistant. The finance committee looks at year-to-date expenditures, percentages spent in each line item, and makes recommendations to the executive committee about any adjustments that should be made. The SILC treasurer gives a financial report at general SILC meetings, and members are provided with a copy of the report.**

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

**The SILC has discretion over its budget, within the parameters of state fiscal rules.**

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

**The SILC carefully considers its responsibilities within the SPIL when developing its budget. Because the SILC is not a non-profit and the state constitution does not allow organizations within state government to raise or receive outside funds, the SILC has no choice but to manage its resources.**

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

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

**The Colorado SILC was established 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)

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 reflects the same composition.**

**Although the SILC reviews applications and makes recommendations for membership, the final membership decision is made by the Governor, as applications are presented by the State Boards and Commissions office. Boards and Commissions 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)

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 Coordinator is currently a sub-contractor of a contractor paid by the DSU. The SILC Coordinator works independently from a location other than the DSU, and is supervised by the SILC Chair.**

- 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 DSU provides the assistance of a .5FTE Program Assistant, as well as technical assistance from the Independent Living Program Coordinator who serves as SILC liaison for the DSU.**

## **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 SILC, in the resource plan for this SPIL, has allocated funds to provide training 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 Recordkeeping, Access and Reporting – 34 CFR 364.35; 34 CFR 364.36; 34 CFR 364.37

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

**All contracts for independent living services 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

**Based on contractual agreement and state IL Rules, 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**

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

**The SILC SPIL Committee meets quarterly to evaluate the progress of SPIL objectives and activities. In the last SPIL, the SILC achieved the objective of developing a website. During this SPIL, the goals and objectives of the SPIL will be posted on the website, accompanied by progress reports. In addition, the SILC will use the website to post surveys that will reach consumers across the state. These surveys will provide information about**

**how the SPIL is working for those individuals, and will help the SILC and DSU collect information that can be used in the next SPIL cycle.**

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

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

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