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Employment First Advisory Partnership: Expanding Employment Outcomes for Coloradans with Disabilities

Initial Report of the Strategic Plan

To Colorado's General Assembly

Report and recommendations in collaboration with the following Colorado Departments: Education, Health Care Policy and Financing, Higher Education, Human Services and Labor and Employment

COLORADO
Department of Labor and Employment
Division of Vocational Rehabilitation

Introduction from Senators John Kefalas and Owen Hill--

To Committee of Reference Members of the 71st Colorado General Assembly and the Community at Large:

We are pleased to submit this preliminary report from the Employment First Advisory Partnership (EFAP) to the committee of reference members of the 71st Colorado General Assembly and the community at large. Pursuant to C.R.S. 8-84-303 (7) (a), this document provides a summary of the initial work achieved by the EFAP and their policy recommendations concerning employment first, evidence-based practices for people with disabilities.

This report originates from the methodical work of the EFAP and the three working committees – Training and Cultural Transformation; Barrier Busting, Process and Education Improvement; and Interagency, Infrastructure and Labor Force. The EFAP process is intentionally inclusive and represents the input of agencies, community-based organizations, individuals, families and businesses that participated with their expertise, ideas and personal stories.

The legislative intent of SB16-077 was to advance effective and efficient collaboration among state agencies to increase competitive integrated employment opportunities for persons with disabilities through comprehensive employment first policies. As articulated in the legislative declaration, eighty-five percent of adults with intellectual and developmental disabilities are either unemployed or underemployed due to employment barriers and disincentives, despite their ability, desire, and willingness to work in the community. This is the problem we are seeking to solve.

Meaningful work is important to all working-age individuals, including persons with disabilities, and public policy to increase competitive integrated employment must promote best practices regarding youth transitions, employer engagement, service system enhancements, and training and supports for persons with disabilities and those delivering services and support. Furthermore, we wish to achieve these goals without adding to government bureaucracy and by focusing on free-market principles that can guide employers to use innovative methods for employing persons with disabilities.

Promoting employment first policies and competitive integrated employment benefits people with disabilities and the state of Colorado because more people entering the workforce contribute to the tax base, and opportunities for meaningful and gainful work lessen dependence on Medicaid and other public assistance. The bottom line is that employment first policies support the self-worth and dignity of people with disabilities who are gainfully employed and working alongside people without disabilities. This effort and these recommendations are about best practices that support all people to be fully engaged and contributing members of our communities.

Respectfully,

Senator John Kefalas (SD-14)
Senator Owen Hill (SD-10)

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Executive Summary

In states embracing an Employment First approach, employment in the general workforce is the first and preferred outcome in the provision of publicly funded services for all working age citizens with disabilities, regardless of level of disability. "Employment First" refers to state systems change initiatives resulting in increased employment outcomes for people with disabilities.

Senate Bill 16-077, "Employment First For Persons With Disabilities: Concerning a collaborative multi-agency approach to increasing competitive integrated employment opportunities for persons with disabilities, and, in connection therewith, advancing an employment first policy," establishes the state's commitment to improving employment outcomes for Colorado citizens with disabilities. The legislation creates an Employment First Advisory Partnership (EFAP) tasked with making recommendations to the General Assembly and five state agencies to implement an Employment First framework in Colorado. This document represents the initial report and strategic plan related to that effort.

Employment First is based upon the premise that all people, including people with the most significant disabilities, are capable of full participation in employment and community life.

Report recommendations impact all EFAP agency partners which includes the Colorado Departments of:

- Labor and Employment (CDLE)
- Health Care Policy and Financing (HCPF)
- Education (CDE)
- Human Services (CDHS), and
- Higher Education (CDHE)

Included are proposed changes to departmental practices and structures, as well as consideration of innovative pilot projects and creation of an office to coordinate statewide Employment First efforts. The eight recommendations are summarized as follows:

1. Produce data for all applicable EFAP agency partners that allow measurement of Colorado's progress toward compliance with federal law requiring people with disabilities receive state-funded services in integrated settings (all EFAP agency partners).
2. Implement department-wide Employment First policies and practices (CDLE, HCPF, CDE).
3. Implement a training plan for state service providers on evidence-based practice to expand employment outcomes, in conjunction with employer-led initiatives and networks (all EFAP agency partners).

4. Implement a communication plan with messaging describing available services that support the achievement of successful employment outcomes for people with disabilities, including those with the most significant disabilities, which targets employers, educators, people with disabilities and their families (CDLE).
5. Create an Office of Employment First to coordinate cross-departmental efforts to implement Employment First policies, regulations and practices (Colorado).
6. Develop appropriate funding structures that will increase employment service and support capacity (all EFAP agency partners).
7. Design and coordinate locally-based pilot projects to demonstrate the expansion of employment outcomes for people with disabilities through best-practice employment services and supports implementation (all EFAP agency partners).
8. Become a "model employer" for Colorado citizens with disabilities (Colorado).

The recommendations section is followed by background information and several appendices that include EFAP Recommendations at a glance, implementation strategies, a terminology glossary, an annotated bibliography and Colorado's authorizing Employment First legislation.

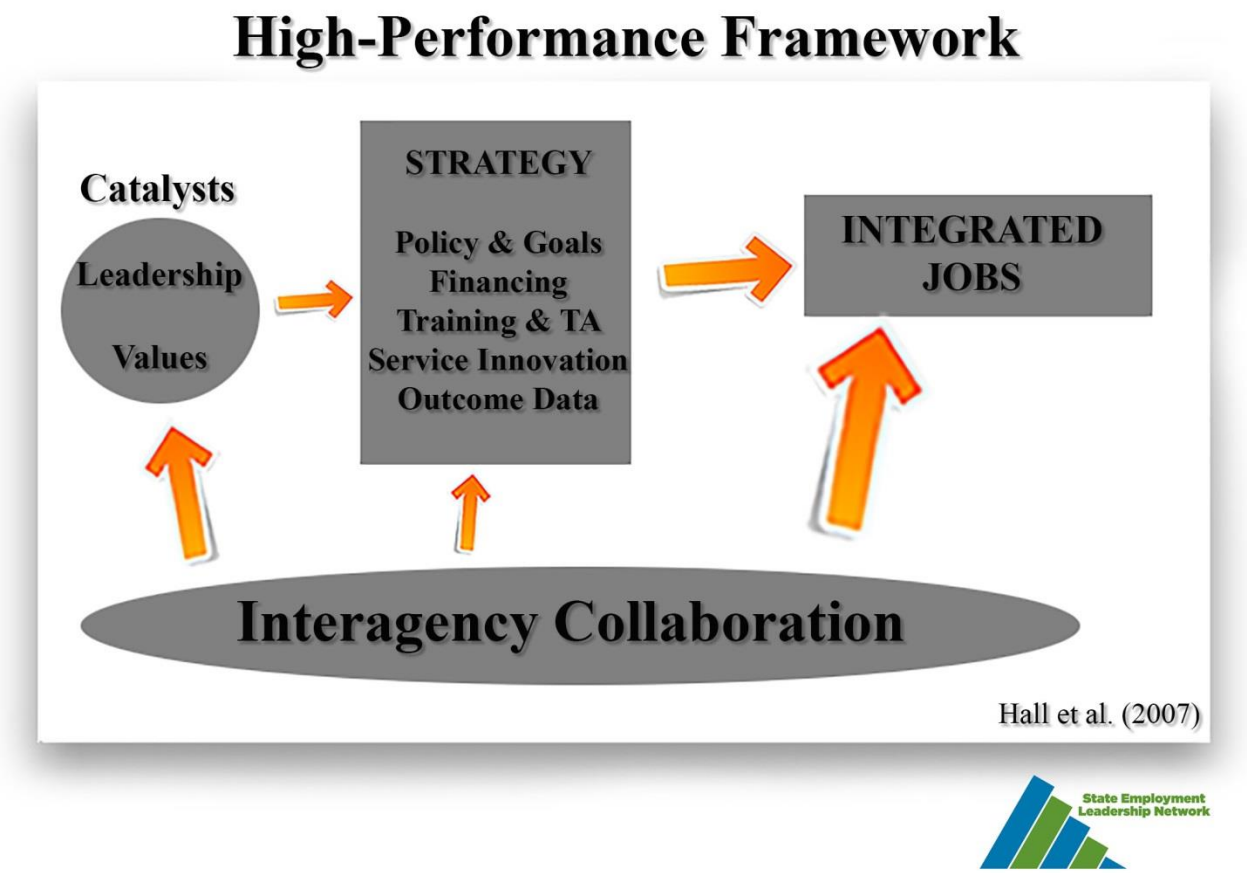
What is Employment First?

Employment First is:

- The prioritization of employment as the first and preferred outcome for all working-age persons with disabilities, regardless of level of disability;
- Based upon the premise that all people, including people with the most significant disabilities, are capable of full participation in employment and community life;
- A state-level systems change framework resulting in increased, successful employment outcomes for people with disabilities;
- The alignment of employment-related policies, service delivery practices, and service funding structures between state agencies;
- Employment as defined by Work Force Innovation and Opportunity Act[i] language describing Competitive Integrated Employment (employment within businesses typically found in the community with regular compensation, the same opportunities for advancement and interaction with nondisabled coworkers to the same extent as other employees in comparable positions interact, i.e., a fully integrated workplace).

Presently there are 46 states with some type of Employment First-focused effort. At least 33 of these states have an official state policy, stating that employment in the community is the first and preferred service option for people with disabilities.[ii] Employment First is seen as an innovative framework utilized by state governments to improve employment

outcomes for people with disabilities.[iii] Central to the national Employment First movement is the premise that all individuals with disabilities, including those with the most significant disabilities, are capable of full participation in the workforce.[iv] Success of the national Employment First policy initiative requires that research-based, best practice employment technologies, best exemplified by supported and customized employment,[v] are implemented. Customized employment provides for negotiated job duties, schedule and location that match a job seeker's unique interests, skills and contributions to an employer's needs. This provides a structure within which any person can be employed with appropriate accommodations and supports. Further, these employment technologies have been found to be cost-efficient from the tax payer's perspective, returning approximately $1.46 for each dollar of taxpayers' cost as compared to more traditional programs.[vi]



Recommendations

All recommendations within this report are contingent upon additional research and analysis, funding, appropriate legislative authority, and federal approval. Additionally, all timelines are subject to reasonable, planned adjustments as identified by the State Rehabilitation Council and state agency

partners. In order to ensure the success of these initiatives state Agencies must work closely with external stakeholders to inform how these recommendations are implemented. All work should be done transparently with community partners.

Recommendation 1

Produce data for all applicable EFAP agency partners that allow measurement of Colorado's progress toward compliance with federal law requiring people with disabilities receive state-funded services in integrated settings, consistent with Olmstead v. L.C.

1.-A Develop a system to track employment outcomes and day service participation for Coloradans with significant disabilities and produce an annual report to the Colorado General Assembly consistent with CRS 25.5-10-204 (1) (g) (III).

1.-B. Consistent with states responding to recent Olmstead concerns,[vii] set specific numerical annual competitive integrated employment (CIE) goals for Home and Community Base Services (HCBS) participants.

1.-C. Modify as appropriate, policy service rates, rules and regulations for Medicaid Home and Community Based Services (HCBS) community connections services to enable people supported by HCBS waivers to obtain inclusive community opportunities available to all citizens.

1.-D. Review Home and Community Based Services (HCBS) Medicaid waiver program Prevocational Service definition[viii] to disallow segregated or congregate implementation characteristics, within the framework of the CMS Final Setting Rule[ix] and U.S. Department of Justice guidance to states on its application to state employment services[x].

1.-E. Modify Colorado's Community Living Plan: Colorado's Response to the Olmstead Decision[xi] to include sections that address employment segregation and provide guidance consistent with the Centers for Medicare and Medicaid Services (CMS) Final Setting Rule and the previously referenced Community Living Advisory(CLAG) report. The Employment First Advisory Partnership (EFAP) will provide strategic support to provide recommended changes.

Recommendation 2

Implement department-wide Employment First policies and practices.

I. Prepare students and youth with disabilities for the world of work through CDE

2.-A. Develop practices that reflect a presumption that all persons with significant disabilities are capable of full participation in competitive integrated employment and community life and promote a vision and a culture throughout CDE and all Local Education Agencies (LEA's), to cultivate best practices by educators that result in the outcomes of individual competitive employment or enrollment in post-secondary options.

2.-B. Implement a process to evaluate the current state of technology practices within the K-12 setting, identify best practices, determine gaps in education, postsecondary settings, and employment systems and make recommendations to improve access to technology for all students with disabilities transitioning to postsecondary and employment.

II. Champion Employment First policy and practice through CDLE

2.-C. Develop practices that reflect a presumption that all persons with disabilities are capable of working in competitive integrated employment if they choose to do so and ensure that options for competitive integrated employment with appropriate supports are explored before consideration of segregated activities consistent with 8-84-302 (b), pertaining to CDLE.

III. Embrace Employment First policy and practice through State Agencies

2.-D. Develop practices that reflect a presumption that all persons with disabilities are capable of working in competitive integrated employment if they choose to do so and ensure that options for competitive integrated employment with appropriate supports are explored before consideration of segregated activities consistent with CRS 25.5-10-204 (1), (g), (I), pertaining to HCPF.

2.-E. Expand Supported Employment services to all Colorado Adult HCBS Medicaid waiver programs and align service definitions, consistent with the CLAG report.[xii]

2.-F Expand access to Colorado's Medicaid Buy-In for Working Adults with Disabilities[xiii] to all HCBS Medicaid waiver program working age adults.

<u>Recommendation 3</u>

Implement a training plan for state-contracted service providers on evidence-based practice to expand employment outcomes, in conjunction with employer-led initiatives and networks.

3.-A: Require ongoing training and/or certification on job development and related topics for supported employment providers designed to enhance the quality of services and knowledge of employees, in collaboration with organizations like the Washington Initiative on Supported Employment (WISE), Coaching, Training and Transformation LLC, formerly the Center for Technical Assistance and Training (CTAT), the Colorado Association of People Supporting Employment First (COAPSE), mental health centers, and others engaging in training.

3.-B: Obtain resources and technical assistance to develop programming that establishes more robust partnerships between supported employment stakeholders and the public workforce system.

3-C: Develop a statewide and local Business Leadership Network(s) or a like model for Colorado to expand employee recruitment programs for individuals with disabilities, working within existing employer-led initiatives (i.e. Sector Partnerships, Industry Intermediaries), based on business needs, and incorporating libraries and community colleges

3.-D: Develop and promote self-employment opportunities, both full- and part-time, with youth and adults.

3.-E: Increase access to implement the Individual Placement and Support (IPS) model across all interested EFAP agencies to include all people with disabilities and align with the Governor's Vision 2018 that IPS is implemented at all Colorado Community Mental Health Centers.

Recommendation 4

Implement a communication plan with messaging describing available services that support the achievement of successful employment outcomes for people with disabilities, including those with the most significant disabilities, which targets employers, educators, people with disabilities and their families.

Detailed Recommendation:

Allocate sufficient funding to the State Rehabilitation Council to develop and implement a communications plan on Employment First Policies for state agencies, educational entities, and civic organizations promoting the concept and value of competitive, integrated employment, and resulting in enrolling more individuals and families in employment initiatives.

Recommendation 5

Create an Office of Employment First to coordinate cross-departmental efforts to implement Employment First policies, regulations and practices.

5.-A. Create an Office of Employment First to implement, in consultation with the State Rehabilitation Council, a cross departmental process within EFAP Agency Partners to identify state policy, regulation and practice within the five state partner agencies that present barriers to Employment First implementation and develop strategies to remove those barriers and align policy, regulation and practice between EFAP Agency Partners as described within 8-84-303. The departments shall report their suggestions to the EFAP for inclusion in the annual report to the legislature.

5.-B. Explore funding options to provide dedicated staffing that will be assigned to Employment First policy and practice implementation for each EFAP partner (HCPF, CDLE, CDHS, CDE, CDHE) and reassign staff or hire additional staff for this function as appropriate.

5.-C. Increase funding to the EFAP Agency Partners to increase capacity and expertise for public benefits planning resources accessible to all Colorado communities so that the employment barrier associated with fear of benefit loss is reduced. Consistent with the CLAG[xiv] report, increase the number of and training for Community Work Incentive Coordinators (CWICs) and leverage the SOAR model[xv]

5.-D. Create the infrastructure for autonomous peer-run employment support services through commitment of funding, development of billing mechanisms and services through one of the EFAP Agency Partners

Recommendation 6

Develop appropriate funding structures that will increase employment service and support capacity for people with disabilities within Colorado to successfully align service outcomes with the definition of Competitive Integrated Employment (CIE) within the Workforce Innovation and Opportunity Act (WIOA)[xvi].

Detailed Recommendation:

Analyze supported employment funding structures within CDLE and HCPF and make recommendations to assure rates and other state agency support are sufficient to encourage service providers to expand capacity for competitive integrated employment services and supports to Colorado citizens with disabilities.

Recommendation 7

Design and coordinate locally-based pilot projects to demonstrate the expansion of employment outcomes for people with disabilities through best-practice employment services and supports implementation.

Detailed Recommendation:
Provide funding to create and implement up to three pilot programs statewide in 2018 to demonstrate the systematic expansion of competitive integrated employment outcomes through the use of supported employment models such as Individualized Placement Services (IPS), training in customized employment and technical assistance with collaboration between the workforce system, the Division of Vocational Rehabilitation (DVR) and HCPF.

Recommendation 8

Become a "model employer" for Colorado citizens with disabilities.

8.-A. Make recommendations for changes to Colorado Revised Statutes that require the State of Colorado to serve as a model employer of individuals with disabilities consistent with the "Colorado Hires" recommendation of the Community Living Advisory Group (CLAG) Report.[xvii]

8.-B. Implement C.R.S. 27-10.5-902 State Employment Program for Persons with Developmental Disabilities[xviii]

The Employment First Advisory Partnership

Senate Bill 16-077 (Employment First for People with Disabilities)[xix] created an Employment First Advisory Partnership (EFAP) whose mission is to develop a strategic plan which will expand competitive integrated employment outcomes for people with disabilities through Employment First policies and practices within state government. Consistent with legislative direction, the make-up of stakeholders participating in the Employment First Advisory Partnership has been diverse in experience, expertise and background.

The strategic plan recommendations attempt to ensure that the primary objective and preferred outcome of publicly-funded services is competitive integrated employment for working-age people with disabilities. Competitive Integrated Employment (CIE) is paid work in a typical community business with the same benefits and opportunity to interact with nondisabled coworkers as any other employee. CIE specifically rejects the notion that people with disabilities need special employment models that tend to segregate, congregate and/or socially isolate an employee from others in the work environment.

Employment First Background

Colorado has long been seen as a national leader in disability policy and practice. In 1978 a group of 19 Colorado citizens engaged in non-violent civil disobedience, blocking two Regional Transportation District buses at the corner of Broadway and Colfax in Denver, to bring attention to the lack of accessible public transportation.[xx] This effort by members of Denver's Atlantis Community led to the creation of ADAPT, one of the nation's most respected disability rights organizations. This action sparked the disability rights movement, ultimately leading to passage of the Americans with Disabilities Act (ADA) in 1990. Shortly after, when 1915(c) waivers became available to states in the early eighties, Colorado obtained approval for the second and sixth waivers granted by the Centers for Medicare and Medicaid Services (CMS).[xxi] Colorado's early adoption of Home and Community Based Services (HCBS) provided alternatives to segregated institutional services for people with disabilities. In the nineties when the Colorado Division for Developmental Disabilities supported 50% of individuals served statewide in integrated employment settings, Colorado was once more identified as a leading state in the disability arena.[xxii]

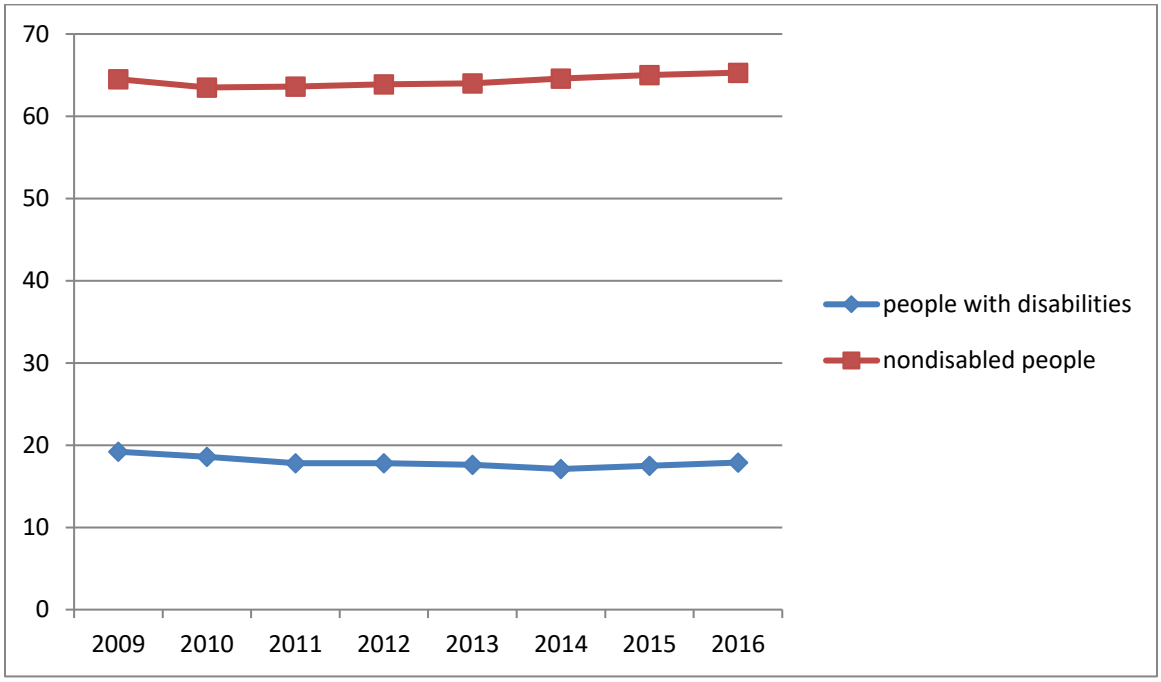
> Employment First is the prioritization of employment as the first and preferred outcome for all working-age persons with disabilities, regardless of level of disability.

Over the last several decades people with disabilities have experienced expanded civil rights and societal inclusion. While employment is not a right per se, the Americans with Disabilities Act (ADA) provides access to employment, free of disability-related discrimination, for qualified individuals with disabilities. Many felt that Title II of the ADA (which prohibits employment discrimination on the basis of disability and requires reasonable accommodation for disabled applicants) would result in significantly greater numbers of people with disabilities in the U.S. workforce. This has not been the case. In

fact, it appears the ADA may have reduced employment opportunities for individuals with disabilities.[xxiii] Recent Bureau of Labor Statistics (BLS) data bear out concerning, ongoing disparities between people with disabilities and the nondisabled when it comes to U.S. workforce unemployment and participation.

A concerning statistic involves employment for people with disabilities compared to employment of the nondisabled population. BLS data indicate that only 17.5% of U.S. citizens with disabilities are employed while 65% of the U.S. nondisabled population for the United States were employed in 2016[xxiv]. What explains these significant statistical differences?

Employment Population Ratio 1



Recent employment-related enforcement of the Supreme Court's Olmstead Ruling may provide insight into the issue. Olmstead requires that states eliminate unnecessary segregation of persons with disabilities and ensure that persons with disabilities receive services in the most integrated setting appropriate to their needs.[xxv] According to a 2016 statement by the Civil Rights Division of the U.S. Department of Justice (DOJ) "many individuals with disabilities who receive employment and day services that are planned, funded, and administered by state and local governments continue unnecessarily to receive services, and spend the majority of their daytime hours, in segregated settings." State-sponsored employment segregation has been an ongoing and pernicious problem in the vast majority of states for decades. State-administered employment programs can remedy

Olmstead violations through "system-wide capacity-building, transition, and ongoing support based on measurable goals, outcomes, and timelines."[xxvi] It follows that systems change supported by Employment First implementation efforts may protect states from potentially costly litigation.

For example, in 2014 DOJ entered into the first statewide settlement agreement with Rhode Island to address the rights of 3,250 people with disabilities to receive state-funded employment and daytime services in the broader community rather than in segregated sheltered workshops and facility-based day programs.[xxvii] A year later a similar agreement between Justice and Oregon resolved a class action claim impacting approximately 7,000 Oregonians with intellectual and developmental disabilities who could and wanted to work in typical employment settings in the community. It was found that Oregon's state-funded employment services system unnecessarily placed people with I/DD in, or at risk of entering sheltered workshops and segregated day programs instead of in integrated jobs in the community, in violation of the ADA.[xxviii] Colorado demographics in the use of segregated employment and day programs are similar to Rhode Island and Oregon. While the primary intent of Colorado's Employment First legislation is to expand employment opportunity for Coloradans with disabilities, it is also to establish policy as part of the state's plan to address federal case law, relating to providing disability services in an integrated setting.[xxix]

Colorado's Employment First Advisory Partnership represents a multi-disciplinary state team with a focus on implementing the Employment First approach with fidelity through the alignment of policies, coordination of resources, and updating of service delivery models to facilitate increased integrated employment outcomes for people with disabilities, including people with the most significant disabilities. On behalf of the Employment First Advisory Partnership we trust you will find this initial report useful. We look forward to the ongoing collaborative process of building on these recommendations to assure Colorado citizens with disabilities have enhanced opportunity to secure meaningful employment.

Vision

The Colorado Employment First Advisory Partnership (EFAP) envisions every person with a disability who wants to work can work and receive competitive wages, regardless of the level of disability they experience.

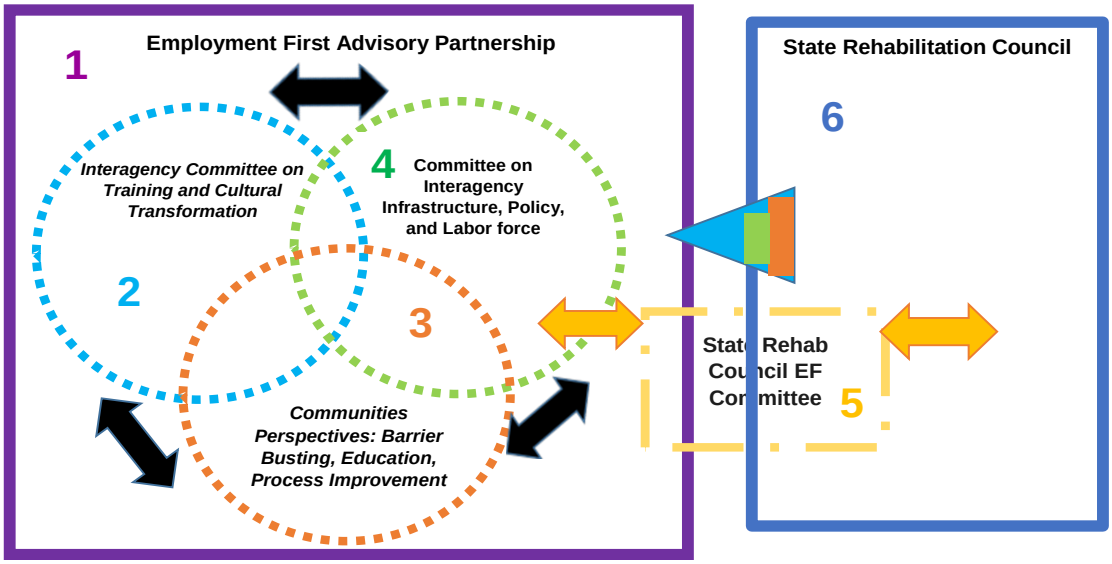
EFAP Structure

After setting this vision, the EFAP determined that it is best achieved through three distinct, yet interconnected focus areas. These focus areas became the three working committees of the partnership that analyzed data and crafted the initial recommendations for change. In July and August of 2017 committee members further refined recommendations through documented suggestions which were collectively considered during full EFAP meetings. The committee focus areas are:

- **Training and Cultural Transformation**
    - This committee identified training/ knowledge gaps among agency staff and vendors (excluding K-12 and higher education) and develops solutions that result in service provider transformation and employer engagement.
    - The Training and Cultural Transformation Committee conducted a survey of providers to assess existing training gaps and scanned policies and practices in other states to understand the current barriers to success in Colorado. The survey revealed that the majority of supported employment providers responded that further training in competencies including: job development, work place supports, benefits planning, supported employment, discovery and long term supports would enhance their abilities to perform their jobs in finding employment for individuals with significant and most significant disabilities.
    - The committee has developed detailed recommendations and suggested strategies that can be explored in Appendix One to this report. Specific models utilized by other states, including Washington, Oregon, and Wyoming, have been identified as viable examples for use in Colorado. These models are discussed in detail in Appendix Two.

- **Barrier Busting, Education, and Process Improvement**
    - This committee identified and developed solutions to key barriers to CIE, pre-vocational services, school to work transition and the training/ knowledge gaps among people with disabilities & families.

- **Interagency Infrastructure, Policy, and Labor Force**
    - This committee identified unnecessary, inefficient, or conflicting rules and regulations and develops solutions for cross systems policy and funding alignment that result in service capacity building, with consideration of Olmstead and data issues.



Links to Appendixes

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APPENDIX FIVE: EFAP Recommendations at a glance

APPENDIX SIX: Employment First Advisory Partnership

[i] U.S. Department of Labor. WIOA Resource Page. Accessed August 13, 2017 from: https://www.doleta.gov/wioa/
[ii] Association of People Supporting Employment First (2017). SELN Employment First Resource List. Accessed October 19, 2017 at: http://apse.org/employment-first/resources/
[iii] National Task Force on Workforce Development for People with Disabilities (2016). *Work Matters: A Framework for States on Workforce Development for People with Disabilities.* The Council of State Governments & National Conference of State Legislatures. Washington D.C. Accessed August 14, 2017 from: http://www.ncsl.org/Portals/1/Documents/employ/Work_Matters_Report.pdf.
[iv] LEAD Center (2015) Employment First Technical Brief #1: Connecting the Dots: Using Federal Policy to Promote Employment First Systems Change Efforts. Accessed July 15, 2017 from: http://www.leadcenter.org/system/files/resource/downloadable_version/Employment_First_Technical_Brief__1_0.pdf
[v] *Customized employment* means competitive integrated employment, for an individual with a significant disability, that is— (i) Based on an individualized determination of the unique strengths, needs, and interests of the individual with a significant disability; (ii) Designed to meet the specific abilities of the individual with a significant disability and the business needs of the employer; and (iii) Carried out through flexible strategies, such as— (A) Job exploration by the individual; and (B) Working with an employer to facilitate placement, including— (*1*) Customizing a job description based on current employer needs or on previously unidentified and unmet employer needs; (*2*) Developing a set of job duties, a work schedule and job arrangement, and specifics of supervision (including performance evaluation and review), and determining a job location; (*3*) Using a professional representative chosen by the individual, or if elected self-representation, to work with an employer to facilitate placement; and (*4*) Providing services and supports at the job location. Federal Register Vol. 81, No. 161, August 19, 2016. Accessed on April 27, 2017 at: https://www.gpo.gov/fdsys/pkg/FR-2016-08-19/pdf/2016-15980.pdf
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[vii] See Settlement Agreement, *United States v. Rhode Island and the City of Providence*, 1:13-cv-00442 (D.R.I. June 13, 2013); Consent Decree, *United States v. Rhode Island*, 1:14-cv-00175 (D.R.I. April 9, 2014); Consent Decree, *Lane v. Brown* (formerly *Lane v. Kitzhaber*), 12-cv-00138 (D. Or. Sept. 8, 2015), available at https://www.ada.gov/olmstead/olmstead_enforcement.htm
[viii] Prevocational Service Definition. Application for a 1915(c) Home and Community-Based Services Waiver (p. 56). Colorado Department of Health Care policy and Financing. Accessed April 27, 2017 at: https://www.colorado.gov/pacific/sites/default/files/HCBS-SLS%20Waiver%20Application.pdf
[ix] CMS HCBS Final Setting Rule Press Release. Accessed June 7, 2017 at: https://www.cms.gov/Newsroom/MediaReleaseDatabase/Fact-sheets/2014-Fact-sheets-items/2014-01-10-2.html
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[xiii] Health First Colorado Buy-In Program for Working Age Adults. Accessed April 27, 2017 at: https://www.colorado.gov/hcpf/medicaidbuyinprograms
[xiv] *Community Living Advisory Group (CLAG) Report: Final Recommendations, September 2014*. Colorado Department of Health Care Policy and Financing. Employment recommendations: pp. 26-31. Accessed on April 26,

2017 at:
https://www.colorado.gov/pacific/sites/default/files/Community_Living_Advisory_Group_Final_Report_09-30-14.pdf

[xv] [xv] SOAR (SSDI/SSI Outreach, Access and Recovery) administered by the Colorado Disability Benefits Support Program. Accessed on July 24, 2017 at: https://soarworks.prainc.com/states/Colorado

[xvi] See note 33.

[xvii] *Community Living Advisory Group (CLAG) Report: Final Recommendations, September 2014*. Colorado Department of Health Care Policy and Financing. Employment recommendations: pp. 26-31. Accessed on April 26, 2017 at:
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