

REQUEST FOR PUBLIC COMMENT

Public comment period: June 29, 2022, through August 13, 2022, at 5:00 p.m. MDT (45-calendar days)

Send comments to: Joelle Brouner, MPA Executive Director, Colorado Developmental Disabilities Council, by emailing joelle.brouner@state.co.us

The Opportunity to Comment

Seeking comment on: The Colorado Developmental Disabilities Council (CDDC) is seeking comment from the public regarding proposed updates to its FFY 2022-2026 Five-Year Plan. Each year in August, Developmental Disabilities Councils may update these plans. In this update the CDDC is incorporating changes suggested by our peers and the program officer from the US Department of Health and Human Services, Administration on Disability, Administration for Community Living. The proposed changes are listed in the table directly below.

To learn more about:

- The CDDC
- The role of the five-year plan in the Council’s work
- Why the plan matters
- Plan elements, and
- Plan Requirements

please scroll down the page below the table.

Current Language	Proposed Change to Language	Requested By	Rationale
<i>Objective 2.3</i> — By 2026, 150 members of families including single parents, two-parent extended, intergenerational, or foster families with students with IDD (pre-K through grade 12) will be educated in and using current best practice tools to	<i>Objective 2.3</i> — By 2026, <i>to address targeted disparity</i> , 150 members of families including single parents, two-parent extended, intergenerational, or foster families <i>Spanish-speaking parents, guardians or family members with</i>	Peer reviewers and the CDDC program officer	A Developmental Disabilities Council are required to address a targeted disparity in their five-year plan. Disparity means a difference, or a gap between how one group of people are treated and how another group is treated.

<p>advocate effectively for Individualized Education Plans that demonstrate progress toward personalized, self-determined goals, objectives and strategies and incorporate educational best practices in planning and outcome.</p>	<p><i>students with IDD (pre-K through grade 12) in Denver or Aurora Public Schools</i>, will be educated in and using current best practice tools to advocate effectively for Individualized Education Plans that demonstrate progress toward personalized, self-determined goals, objectives and strategies and incorporate educational best practices in planning and outcome.</p>		<p>The Colorado Dept. of Education reports data about the rates of students who graduate from high school in four years. These rates are available by race. The two student populations with the widest disparity in graduation rates are “American Indians” at 64.5% compared with their “Asian” peers who graduate at the highest rate, 91.5. Seventy-six percent of “Hispanic” students have the second greatest disparity at 74.2 %, a 17.3% between their four-year graduation rate and their “Asian” peers.</p> <p>According to the US Census, “American Indians” comprise 1.1% of the state population, whereas, “Hispanics” make up 18.7%. Based on the aim to impact more people the CDDC decided to focus on reducing the four-year graduation rate among Hispanics with intellectual or developmental disabilities.</p> <p>This choice consistent with feedback from</p>
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			<p>those who responded to the Council’s survey of unmet needs in Spanish, of whom, 95.6% indicated a need for culturally and linguistically appropriate education on developing and advocating for individual education plans.</p> <p>The CDDC is seeking to provide this information to families with students in Aurora and Denver Public Schools because data from the Colorado Department of Education indicates that these districts serve the most Spanish-speaking families.</p>
<p>Objective 3.1— By 2023, the Council will develop, convene, and resource a statewide coalition comprised of people with IDD, people with other disabilities, their family members, and other strategic partners to drive broader implementation of policies and practices consistent with the Olmstead Decision², as well as support the Colorado Statewide Transition Plan³.</p>	<p>Objective 3.1— By 20236, together with partners the Council will develop, convene, and resource a statewide coalition comprised of people with IDD, people with other disabilities, their family members, and other strategic partners to drive broader implementation of policies and practices consistent with the Olmstead Decision²; as well as support the Colorado Statewide</p>	<p>The CDDC</p>	<ol style="list-style-type: none"> 1. Since the submission of the plan on September 30, 2021, the US Dept. of Justice found Colorado out of compliance with Olmstead. 2. COVID May delay implementation of the Settings Rule. 3. The proliferation of numerous housing work groups leaves the previous language

	<p>Transition Plan increase understanding of competitive integrated employment, and or integrated housing among Coloradans of all backgrounds with intellectual and developmental disabilities and their families.</p>		<p>potentially redundant and narrow</p>
<p><i>Objective 3.2</i>— By 2024, the Council and its partners will develop an advocacy curriculum and train a minimum of 50 self-advocates and family members about using the Olmstead Decision and the Colorado Transition Plan to increase inclusion and integration of Coloradans with IDD in housing and employment.</p>	<p><i>Objective 3.2</i>— By 2024-2026, the Council and its partners will increase the capacity of self-advocates and family members of all backgrounds, to effectively advocate to live and work in inclusive, integrated environments. about using the Olmstead Decision and the Colorado Transition Plan to increase inclusion and integration of Coloradans with IDD</p>	<p>The CDDC</p>	<ol style="list-style-type: none"> 1. Since the submission of the plan on September 30, 2021, the US Dept. of Justice found Colorado out of compliance with Olmstead. 2. COVID May delay implementation of the Settings Rule. 3. The proliferation of numerous housing work groups leaves the previous language potentially redundant and narrow
<p><i>Objective 3.3</i>— By 2025, the Council and its partners will mobilize self-advocates and family members who completed the training (cited in 3.2, above) to</p>	<p><i>Objective 3.3</i>— By 2025 2026 the Council and its partners will mobilize self-advocates and family members who completed the training</p>	<p>The CDDC</p>	<ol style="list-style-type: none"> 1. Since the submission of the plan on September 30, 2021, the US Dept. of Justice found Colorado out of compliance with Olmstead.

<p>advocate for the implementation of the recommendations proposed by the coalition (cited in 3.1, above).</p>	<p>(cited in 3.2, above) to advocate for the implementation of the recommendations proposed by the coalition (cited in 3.1, above). advance changes to policies, practices, or systems that increase opportunities for Coloradans with intellectual or developmental disabilities to live and work in inclusive, integrated environments.</p>		<p>2. COVID May delay implementation of the Settings Rule.</p> <p>3. The proliferation of numerous housing work groups leaves the previous language potentially redundant and narrow</p>
<p>Additional language</p>	<p>Goal Five—Between 2022-2026, the Colorado Developmental Disabilities Council and its partners will address emerging issues that impede capacity of families and Coloradans with intellectual or developmental disabilities to experience inclusion, integration, or opportunities to participate in all aspects of life within the community at-large.</p>	<p>Peer reviewers and the CDDC program officer.</p>	<p>To create a place in our plan for work to address emerging issues.</p>
<p>Additional language</p>	<p>Objective 5.2—By 2026, undertake advocacy to address emerging issues that influence the capacity of families and Coloradans with intellectual or</p>	<p>Peer reviewers and the CDDC program officer.</p>	<p>To create a place in our plan for work to address emerging issues.</p>

	developmental disabilities to experience inclusion, integration, or opportunities to participate in all aspects of life within the community at-large.		
Additional language	Objective 5.2—By 2026, undertake capacity-building activities to address emerging issues that impede opportunities of families and Coloradans with intellectual or developmental disabilities to experience inclusion, integration, or opportunities to participate in all aspects of life within the community at-large.	Peer reviewers and the CDDC program officer	To create a place in our plan for work to address emerging issues.
	Objective 5.3—By 2026, undertake systems change to address emerging issues that impede the capacity of families and Coloradans with intellectual or developmental disabilities to experience inclusion, integration, or opportunities to participate in all aspects of life within the community at-large.	Peer reviewers and the CDDC program officer.	To create a place in our plan for work to address emerging issues.

What is the Colorado Developmental Disabilities Council?

Background:

The CDDC is a board of 23, volunteer members. The Governor appoints CDDC members. Sixty percent of the CDDC's membership are people with intellectual or developmental disabilities, or are parents, immediate family members, or legal guardians of individuals with these (federally defined) disabilities. There are two laws that allow the CDDC to operate, a federal law, P.L. 106-402 (the Developmental Disabilities Assistance and Bill of Rights Act), and a state law, C.R. S. 27-10.5-201.

What does the Colorado Developmental Disabilities Council do?

The mission of the CDDC is to advocate for system change by promoting meaningful, person-centered participation, self-determination, and inclusion for all individuals with developmental disabilities.

The CDDC's primary responsibilities are to:

1. Understand unmet needs of Coloradans with intellectual and developmental disabilities and families.
2. Create a plan to meet some of those needs
3. Use time, federal funds, and partnerships (over five years) to put the plan in action.
4. Increase inclusion, integration, self-determination, and opportunities for Coloradans with intellectual, and developmental disabilities to participate in all aspects of community life.

What is the Five-Year Plan, and why does it matter?

The plan identifies the unmet needs of Coloradans with intellectual and developmental disabilities and their families. It serves as an agreement between the Colorado Developmental Disabilities Council, the US Dept. of Health and Human Services, Administration for Community Living, and Coloradans with intellectual and

developmental disabilities and their families about how resources, advocacy, capacity-building, and systems change efforts will meet some of those needs. The plan matters because it provides information about what to expect from the Council.

What is the Policy of the United States, and What Does the Plan Have to Do with It?

According to the Developmental Disabilities Assistance and Bill of Rights Act (the law), 42 USC 150001 (c) (1-) it is the policy of the United States that:

“(c) POLICY.—It is the policy of the United States that all programs, projects, and activities receiving assistance under this title shall be carried out in a manner consistent with the principles that—

(1) individuals with developmental disabilities, including those with the most severe developmental disabilities, are capable of self-determination, independence, productivity, and integration and inclusion in all facets of community life, but often require the provision of community services, individualized supports, and other forms of assistance;

(2) individuals with developmental disabilities and their families have competencies, capabilities, and personal goals that should be recognized, supported, and encouraged, and any assistance to such individuals should be provided in an individualized manner, consistent with the unique strengths, resources, priorities, concerns, abilities, and capabilities of such individuals;

(3) individuals with developmental disabilities and their families are the primary decisionmakers regarding the services and supports such individuals and their families receive, including regarding choosing where the individuals live from available options, and play decisionmaking roles in

policies and programs that affect the lives of such individuals and their families;

(4) services, supports, and other assistance should be provided in a manner that demonstrates respect for individual dignity, personal preferences, and cultural differences; (5) specific efforts must be made to ensure that individuals with developmental disabilities from racial and ethnic minority backgrounds and their families enjoy increased and meaningful opportunities to access and use community services, individualized supports, and other forms of assistance available to other individuals with developmental disabilities and their families;”

There is work to do before the policy of the United States and the reality of people with intellectual and developmental disabilities and their families match. Developmental Disabilities Councils exist to make life as inclusive and integrated as the policy says it can be. The plan provides information about how we will improve things.

Elements of the Plan, Information About Plan Development

At 42 USC 15024 (a) the law requires all Developmental Disabilities Councils to make a strategic plan every five years. The law requires the plan to address some of the unmet needs of people with intellectual and disabilities and their families. The goals, objectives and plan activities seek to narrow the gap between policy and the realities of people with these disabilities in Colorado.

From October 2020 through February 2021, the Council collected survey responses in Spanish and English from people with intellectual and developmental disabilities and their families to learn which unmet needs are most important to meet. There were also three listening sessions to provide another way to offer input. We received 579 survey responses, of which 23 were in Spanish. Excluding

Council members and staff 34 members of the public provided input during listening sessions.

The plan includes several parts:

Part of the Plan	Purpose
Comprehensive Review and Analysis	This prepares the reader to understand what makes life for people with intellectual and developmental disabilities in Colorado similar and different than it is for their peers in other states and territories by providing data and explaining the services and supports available as well as the needs that are not met. It should also make a case for why the Colorado Developmental Disabilities Council selected certain issues to address with time, partnership, and other resources.
Goals and Objectives	Goals and objectives identify the issues the Council will use resources to address from October 1, 2021, and September 30, 2026. Objectives break those big topics into smaller topics.
Annual Work Plan	The work plan includes activities the Council will support to accomplish objectives and goals. It is updated annually.
Evaluation Plan	Explains the Colorado Developmental Disabilities Council will know if the activities are accomplishing the goals and activities.
Logic Model	A graphic or chart that shows a relationship between Council resources; the advocacy, capacity-building, and systems change activities, and what we intend to accomplish.

The Developmental Disabilities Assistance Bill of Rights Act and technical assistance memoranda specify required plan content. The five-year plan should address the unmet needs of unserved or underserved Coloradans with intellectual and developmental disabilities to increase inclusion, integration, self-determination, and participation in all aspects of community life.

Plan Requirements	Explanation
Annual work required under each goal	The Council must lead or sponsor work to make progress on a minimum of one objective per goal annually.
Demonstrate Council functions	The plan must include advocacy, capacity-building, and systems-change work.
Collaborative work with specific organizations	The Developmental Disabilities Assistance Bill

	of Rights Act establishes ongoing relationships between Councils, the Protection & Advocacy Systems, and University Centers for Excellence in Developmental Disabilities (i.e. Disability Law Colorado and JFK Partners)
Leadership development training	Council must provide these activities for people with intellectual and developmental disabilities, parents, guardians, and immediate family members.
Increase statewide capacity for self-advocacy	Each year support an organization with a statewide presence, led by people with developmental disabilities to increase self-advocacy
Support people with intellect for people with intellectual and developmental disabilities to teach peers	Include work that empowers people with developmental disabilities to train peers.
Support people with developmental disabilities to participate in cross cultural coalitions	The term cross-cultural coalition is not defined.
Reduce a targeted disparity	Reducing an inequity by finding a specific example (supported by data and corroborated with other information) of one group of people with intellectual or developmental disabilities with similar experiences of disability, receiving fewer supports or services than another group of their peers with due to another characteristic. Other characteristics include but are not limited to class, gender, race, sexual orientation, immigration status).

The Colorado Developmental Disabilities Council submitted a draft 2022-2026 plan to the US Dept. of Health and Human Services, Administration for Community Living on September 30, 2021. The submission was reviewed by peers and program officers. The feedback received from these reviews are reflected in the proposed changes.

Thank you for your time, comments, and interest in the work of the Colorado Developmental Disabilities Council.