



July 7, 2020

To: Members of the Colorado Human Services Board
Cc: Colorado Department of Human Services, Office of Early Childhood
From: Josh Rael, Executive Director & Matt VanAuken, President
Re: **Emergency Early Intervention Rule Changes**

Dear Members of the Human Services Board,

Alliance is the statewide, non-profit association of Community Centered Boards (CCBs) and Program Approved Service Agencies supporting children and adults with intellectual and developmental disabilities and delays across Colorado. Our membership includes all 20 of Colorado's CCBs, which provide service coordination and, in some cases, therapy services for Colorado's Early Intervention (EI) program. This program provides critical services to children with developmental delays or disabilities and their families from birth to age three. These supports help children develop to their full potential and may decrease the need for additional services later in life.

A number of studies have found significant return-on-investment from EI services, as many programs demonstrate significant cost savings to other services, such as Part B Special Education, that eligible children may access later in life. While results vary, one program studied returned \$7.10 in savings for every \$1 invested, and, overall, the research suggests that the societal benefits of early intervention exceed the costs.

The COVID-19 pandemic has had drastic impacts on our state budget. The emergency rule before you outlines a policy change that will narrow eligibility for the program in order to address the EI program's financial challenges. At this time, Alliance is not opposing the emergency rule, but we do wish to voice our grave concerns about the impact this rule will have on Colorado families.

Colorado has been a national leader in providing Early Intervention services, and we are saddened to see the state taking a step back by curbing eligibility. This decision will affect thousands of Colorado families – approximately 2,200 annually – whose children won't have the chance to develop to their full potential through EI services. As such, we urge the Office of Early Childhood and the Human Services Board to consider the following in tandem with this rulemaking:

- Ensure that EI evaluation teams can seamlessly connect families whose children will no longer be eligible with alternative resources;
- Revisit the narrowing of eligibility after six months and again after one year post-adoption to determine whether eligibility can be broadened and whether the cost savings in EI was merely a cost shifting or deferment to other statewide services;

- Collect data about costs that will be shifted to other programs as a result of this change, such as increases to Part B Special Education services provided in schools and other long-term services and supports; and
- Collect data to evaluate whether children present to Part B Special Education in the future with more delays and more significant delays due to this narrowing of eligibility.

In these tragic and uncertain times, Alliance is committed to continuing to work with the Office of Early Childhood to ensure that the Early Intervention program continues to provide quality supports to as many Colorado families as possible.

Sincerely,



Josh Rael, JD, MPA
Executive Director
jrael@alliancecolorado.org



Matt VanAuken
President
m.vanauken@dpcolo.org

Alliance is a statewide association of Community Centered Boards (CCBs) and Program Approved Service Agencies (PASAs) that provide services and supports to individuals with intellectual and developmental disabilities.

Alliance members serve over 10,000 individuals with IDD and employ 3,200 DSPs and case managers throughout Colorado.
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