



July 8, 2019

To: Michelle Barnes, ED of CO Dept of Human Services
From: Alliance
Re: Early Intervention Services & Funding
CC: Mary Anne Snyder, Mary Alice Cohen and Christy Scott, CDHS Office of Early Childhood

Dear Director Barnes,

Congratulations on your new role as Executive Director of the Colorado Department of Human Services. We are very excited to get to know you better and explore opportunities to support our mutual goal of improving services for vulnerable populations in Colorado. On behalf of the 17 Community-Centered Boards (CCBs) who are currently Alliance members, I am reaching out to begin what we hope will be a long-time, collaborative relationship to serve children in need of early intervention (EI) services in Colorado.

To support that effort, I am requesting a meeting with you and a couple of our CCB members to discuss some of our collective EI successes, the unprecedented growth we've seen in the state, and some of the challenges we have faced offering services to this population over the past few years.

As a quick review: EI provides developmental supports and services to children birth through three years of age, who have special developmental needs. These services can help improve a child's ability to develop and learn. They can also help parents and family members learn ways to support and promote a child's development, within the family's activities and community life. EI teams are supported by the twenty CCBs in Colorado who cover non-overlapping geographic areas. EI teams are typically comprised of a collaborative group of physical, occupational, speech, and behavioral therapists, developmental interventionists and nutritionists who work together to come up with the most effective treatment plans for the infants and children they serve. The value of these services for families in Colorado cannot be overstated. More than 50% of all children who receive EI services do not go on to need special education services in schools nor additional developmental supports from the state later in life. Colorado's CCBs are honored to play such an important role in early childhood development on behalf of the state.

However, while we have enjoyed a thoughtful working relationship with DHS' Office of Early Childhood (OEC) staff for many years, we continue to struggle with on-going funding and payment issues year after year. In past years we've all strived to work together to overcome the recurring funding issues to ensure there's no delay in EI services nor a waitlist for kids to receive this critical support, which would immediately put federal funding for this work at risk. Unfortunately, more recently, we have noticed a significant drop-off in what was once a productive back and forth communication effort between our two agencies. Previously, OEC hosted regular meetings for OEC and CCB delegates to discuss on-going issues, but those meetings ceased about a year ago. Similarly, OEC staff had once faithfully attended our Alliance forums to provide updates, allow important questions and answer opportunities, and solution-based discussions; unfortunately, in the last year, OEC staff have only attended two of our ten forums, with the last one attended in February. We recognize it can be difficult for busy state staff to attend these meetings each month so we have also asked for someone to call into our meetings or provide written updates when attendance is not possible, but that has not proven successful either. I think we can all agree children receiving services are best supported when collaborative, open communication is prioritized by all entities. If the Alliance monthly forums are not the most effective means for your staff to communicate with CCBs on these important issues, we are certainly open to other pathways for achieving productive, transparent dialogue once again.

To date, the lack of communication between OEC and Alliance (and Alliance members) has resulted in concerns and confusion in several areas that we would appreciate your support in addressing:

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

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- **FY2018-2019 EI Budget & Payments:** We have heard from CCBs that the department has not finished reconciling EI billing for services delivered after December 2018 using the new methodology the Department proposed last year. If that is the case, there is a six-month lag in determining the adequacy of funds in the existing appropriation. In the past, when it has become clear that funds were running short, CCBs have experienced a slowing or even stopping of payments from the Department for services rendered leaving CCBs with a budget hole for funds paid out to contractors and staff. For this reason, the adequacy of the allocation has become increasingly important to CCBs which makes the lack of up-to-date reconciliation particularly concerning. In addition, since the department has been slow to make recent payments using the new funding methodology, some CCBs have had to dip into their reserves to mitigate disruption in cash flow due to these delays.
- **FY2019-2020 Budget & Contracts:** Given the delayed reconciliation of the FY18-19 EI payments, it comes as no surprise that, as of July 1st, 2019 (the beginning of the fiscal year), all twenty CCBs were technically no longer under contract to execute EI services since the department had yet to issue contracts or option letters for the upcoming FYE 6/30/2020. While the contract extensions have now been received, no communication was included to explain this delay. Much like the state of Colorado, the majority of CCBs operate on a July 1 fiscal year and must construct new budgets for approval by their Boards of Directors long before the start of the year. Delayed contracts and lack of communication makes it difficult to navigate this important process.
- **Early Intervention Evaluations (EIE) workgroup from HB18-1333:** Last year the General Assembly passed a bill instructing the state to do the following: “ON OR BEFORE JUNE 30, 2019, THE DEPARTMENT AND THE DEPARTMENT OF EDUCATION SHALL REPORT TO THE JOINT BUDGET COMMITTEE CONCERNING THE AGREEMENT, INCLUDING RECOMMENDATIONS FOR THE ADMINISTRATION OF EARLY INTERVENTION EVALUATIONS.” Unfortunately, it does not appear that the recommendations in the report thus far will include who or what entity/ies will be administering EIE. Given CCBs are one of the likely entities expected to take over some or all EIE activities, the CCBs are reasonably concerned they may experience similar communication and funding issues with EI evaluations as has occurred with other EI services.

As you have surely learned in your new position, early intervention services play a critical role in our state’s overall goals to improve the health and well-being of families and to reduce long-term costs to the state. Not only is EI a clear winner in the ‘return on investment’ category of policy development, but it also fits squarely into the important Two-Generation Approach that guides DHS’ service delivery model. We are optimistic you share our admiration for the importance of these services and are as eager to resolve our communication and payment issues as quickly as we are. Under your new leadership, we are confident we can find a solution that will enhance the sustainability of these services for years to come.

Thank you very much for your time and consideration. I will await a response regarding our request for a meeting to take place as soon as possible. As always, Alliance is ready and willing to partner with DHS to help strengthen the supports and services for children and adults with IDD.

Sincerely,

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