



Requests to Improve Colorado’s Early Intervention Services

According to the Centers for Disease Control and Prevention, about one in six children in the U.S. have one or more developmental disabilities or delays. Early Intervention (EI) services provide support to infants and toddlers, from birth through two years of age, who have developmental delays or disabilities or are at risk for developmental disabilities. These services enhance a child’s development in the areas of cognition, speech, communication, physical and motor development, vision, hearing, social and emotional development, and self-help skills. EI services are currently provided through Colorado’s 20 Community Centered Boards and administered through the Department of Human Services Office of Early Childhood. This year, program administration will be transferred to the new Department of Early Childhood.

The Department of Human Services’ most recent Annual Report of Early Intervention Services demonstrated Colorado’s EI program’s continuing success in serving children and families:

- Ninety-eight percent (98%) of children with significant delays in development who received EI services in FY 2019-20 showed improvement in their acquisition and use of knowledge and skills (motor, cognition, speech, language, etc.).
- Ninety-seven percent (97%) of parents participating in EI services reported that the services helped their family to help their children develop and learn.
- Fifty percent (50%) of the children who exited EI services in FY 2019-20 did not go on to need preschool special education services.

This report and others demonstrate the significant return on investment of EI services through decreased need for other services and increased success in school, the workplace, and community later in life. In fact, a report from the Federal Reserve Bank of Minneapolis revealed EI programs as “economic development initiatives that should be at the top of economic lists for local and state governments.” This report found an \$8 return for every dollar invested in EI and estimated that 80% of the benefits were directly applicable to society in general because of more efficient use of school services and less use of criminal justice and other public systems. Because of the significant positive impact EI has on children and families and, in turn, the fiscal savings it creates, investing in the program’s long-term sustainability is critical.

Colorado’s EI program is experiencing a time of significant change with increasing demands on providers, service coordinators, and program administrators. At the same time, the program is under-funded to adequately support a quality workforce and the growth in the number of children and families referred. Alliance believes the following strategies will help to ensure sufficient funding and reduce administrative overhead to improve the program’s long-term sustainability.

Restore and Maintain Inclusive Eligibility Criteria

Alliance understood the need to limit eligibility to preserve the program during the pandemic, but we were pleased that the General Assembly approved additional funding to return eligibility to pre-pandemic levels in 2022. Colorado’s inclusive eligibility criteria has long made it a national leader, and given the return on investment of EI services, serving as many children with delays and disabilities as possible makes good fiscal sense. The Department should implement the

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intent of the legislature by revising regulations to reinstate pre-pandemic eligibility, making all children with a 25% developmental delay in any one of the five developmental domains eligible for EI services.

Keep Pace with Annual Caseload Growth

The Department's annual caseload growth estimates have failed to keep pace with actual program growth because they have historically been based on prior-year caseloads rather than future-focused growth projections, which are typically higher. This creates a perpetual deficit in funded caseload compared to actual growth. This methodology also fails to account for market trends in compensation that impact CCBs' ability to hire and retain enough skilled EI professionals to serve eligible children. Workforce shortages exacerbated by the pandemic have brought to light the importance of fully funding caseload growth to recruit and retain enough qualified staff.

The resulting lack of funding hinders Colorado's ability to serve all eligible children for two reasons. First, funding is not sufficient to enroll and serve all newly eligible children. Because federal EI rules mandate that states enroll all eligible children and prohibit waiting lists, this poses a risk to maintaining federal approval. Second, insufficient funding prevents CCBs from hiring and retaining enough staff to serve existing and new enrollees. Without enough staff, eligible children won't be able to access the quality services they need regardless of established eligibility criteria.

The General Assembly has indicated its intent to better keep pace with annual EI caseload growth through issuance of a Legislative Request for Information directing the Department to submit an annual report to the JBC. To address these issues and fulfill legislative intent, the Department should incorporate the following into its caseload calculations: (1) population growth data from the State Demography Office to more accurately project enrollment growth, and (2) market data from CCBs on required salaries and benefits for EI positions. Further, midyear caseload adjustments should be made during the General Assembly's supplemental budget process to ensure adequate resources to serve all eligible children.

Allow Contract Flexibility to Meet Workforce Challenges

Currently, EI contracts require CCBs to get approval for every change they make in their compensation structures for EI staff and potentially for any changes in staffing. This requirement creates unnecessary administrative burden for both CCBs and the Department, as well as delays in hiring and recruitment efforts. This is also a departure from other contracts between state agencies and private entities. CCBs should have the flexibility to make decisions about staff compensation so long as they remain within their overall budget allocation. The Department should eliminate this contract requirement, freeing up time and resources at both the CCB and the Department, which is especially important at a time when our system is navigating changes to EI Evaluations and expanded services.

Make Timely Payments

For many years, CCBs have experienced delays in payment for EI services already delivered. This has resulted in CCBs having to dip into savings or credit to cover their costs while they await payment. Delayed payment has obvious implications on CCBs' ability to hire and retain EI staff and the stability of their organizations. The Department should take all necessary steps to ensure timely payment of services.

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