



## Colorado Opioid Abatement Council (COAC)

### Administrative Committee

#### Meeting #31

August 5<sup>th</sup>, 2025  
2:00p– 3:00pm

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**Appointees:** Nancy Rodgers, Dave Frank, Lori Laske, Aaron Miltenberger

**DOL Staff:** Jamie Feld, Jack Patterson, Christian Dykson

**Guests:**

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#### Welcome and Introductions

Nancy Rodgers initiated the session with welcomes and introductions. The Committee moved to approve the July 2025 meeting minutes.

*Dave Frank moved to approve the July 2025 meeting minutes*

*Nancy Rodgers seconded*

*Unanimously approved*

#### Infrastructure Share Funding Priorities

ORU Staff presented proposed updates to the Infrastructure Share funding priorities. The Committee discussed and agreed to: add a new priority emphasizing rural, underserved, and disproportionately impacted regions or communities; strike the prior “repeat funding” priority to avoid penalizing entities previously funded and to keep policy relevant over the 18-year distribution period; consolidate the multi-regional and regional collaboration priorities into a single, broader collaboration priority (recognizing a spectrum from non-regional to statewide efforts); and merge matching/supplementation priorities since supplementation of opioid funds functions as match.

Members deliberated on whether priority points should focus on applications “from” impacted communities versus those that “serve” them. Perspectives highlighted the value of embedded organizations as well as the desire to not disincentivize qualified providers based outside target areas, equity considerations for regions with fewer grant writing resources, and the practicality of assessing “competency to serve” without creating a burdensome rubric. After discussion, the Committee finalized the language:

*“Applications that serve underserved, rural, and/or disproportionately impacted regions or communities of Colorado. Applications from such regions or communities will be given higher priority.”*

The Committee agreed to forward the revised priorities to the full COAC; ORU Staff noted they would lead explanations with Committee members available to support.

#### Infrastructure Share Policy

ORU Staff summarized policy revisions intended to align terminology with the MOU, clarify definitions, and remove unnecessary language. The Committee supported the updates and agreed to recommend the policy—incorporating the finalized funding-priority language—to the full COAC for adoption at its Thursday meeting, with a clean version reflecting the agreed edits to be shared.

### **Contingency Funds & Plan Compliance**

Due to time constraints, the Committee tabled this agenda item.

### **Indirect Costs**

ORU Staff presented draft guidance distinguishing administrative costs from indirect costs. The Committee affirmed that administrative costs (e.g., grant management, reporting, legal) are only those incurred because of the opioid settlement funds and remain capped at 10% under the MOU; costs that would have been incurred regardless are not allowable as administrative. Indirect costs were discussed as organizational costs not readily assignable to a single project (e.g., facilities operations, maintenance, depreciation, certain admin staff salaries, office materials), with the caveat that classification can vary by accounting structure; examples were noted as illustrative rather than absolute.

ORU Staff clarified that regions and local governments may not claim a blanket indirect rate against their total allocation as “administrative costs”; administrative costs must be direct, substantiated expenditures. The Committee agreed that indirect costs can be allowable within programmatic or administrative activities if reasonable, necessary, and reported as part of the relevant funded program (rather than as separate administrative costs) and reaffirmed that supplantation is prohibited.

Members reviewed current regional practices (e.g., separate caps for admin and indirect) and several potential approaches for the Infrastructure Share Round 4 funding opportunity (e.g., collective caps, references to federal “de minimis,” recognition of federally negotiated rates, and using a Modified Total Direct Cost base that excludes capital). To reduce confusion and ensure clear alignment with the MOU, the Committee favored a simple standard: administrative costs capped at 10% and indirect costs capped at 10% (for a practical combined ceiling of 20%), to simplify communication and definitions.

ORU Staff were asked to refine the FAQs and guidance accordingly, seek additional legal review, and bring an updated proposal to the October COAC meeting.

### **Capital Assets**

Due to time constraints, the Committee tabled this agenda item.

### **Post Expenditure Reporting Update**

ORU Staff reported that responses to the recent post-expenditure reporting communication were generally smooth. Boulder acknowledged receipt and confirmed no additional expenditures. Region 3 disclosed a 2025 K9 contract outside Exhibit E; this disclosure was brought to the Review Committee and will be discussed by the full COAC at its Thursday meeting to determine next steps.

### **Public Comment**

No public comments were made.

### **Adjourn**