



Colorado Opioid Abatement Council (COAC)

Review Committee

Meeting Minutes #20

September 22nd, 2025
4:00p– 5:00pm

Appointees: Terrence Gordon, Miles Lucero, Aaron Miltenberger, Andy Kerr

DOL Staff: Jack Patterson, Christian Dykson, Jamie Feld

Guests:

Welcome and Introductions

The meeting was opened by ORU staff, who greeted members and kicked off the meeting.

ORU staff noted that the agenda included review and approval of the July meeting minutes, consideration of September 15 regional funding requests, discussion of Infrastructure Share Round 4 materials, and an initial discussion regarding indirect cost caps.

Meeting Minutes Approval

The committee reviewed the July meeting minutes.

After confirming that there were no requested changes to the minutes, the committee moved to approve the July 28, 2025 meeting minutes as presented.

Aaron Miltenberger moved to approve the July 2025 meeting minutes

Terrence Gordon seconded

Unanimously approved

September 15th Funding Requests

ORU staff then presented the September 15 funding requests from seven regions: 1, 6, 9, 14, 17, 18, and 19. Using a slide deck and an accompanying Excel file, ORU staff explained that the committee's responsibility was to verify that the regional allocations aligned with the MOU and national settlement requirements by ensuring that funds were directed only to approved purposes.

ORU staff clarified that for some regions, including Regions 1 and 14, the requested amendments occurred alongside rollover actions, meaning the slides displayed updated, high-level allocation totals rather than purely new, discrete amounts. Region 1 (Northwest) requested approximately \$27,925 for projected spending of about \$921,000 through 2026; Region 6 (Boulder) requested just over \$2 million, bringing its projected spending to approximately \$4.55 million; Region 9 (Arapahoe) submitted a corrective request for \$85K tied to over-rolled funds from its 2022–2024 plan; Region 14 requested approximately \$778,000; Region 17 (SWORD) requested approximately \$751,000 focused largely on supportive recovery housing and housing assistance; Region 18 (San Luis Valley) requested approximately \$254,000, with the largest share directed to services for people involved in the criminal justice system; and Region 19 (Southeast) requested about \$3.5 million, with funds allocated across several high-level approved categories such as recovery services, prevention, and treatment.

Aaron Miltenberger raised concerns about Region 1’s allocation in the “infrastructure or staffing at government or non-profit agencies” category, specifically around avoiding supplanting and the broad wording of that approved purpose. ORU staff acknowledged that this category had been interpreted broadly by some regions, including facilitation and care coordination services, and agreed that it remained an area where process guidance and clarity could continue to be refined.

Recommendations to Release Funds

Following the presentation, the committee moved to formal actions on the regional funding recommendations.

Andy Kerr moved that the committee recommend the release of funds to Regions 1, 6, 9, 14, and 17.

Terrence Gordon seconded the motion.

Unanimously approved

Andy Kerr moved to recommend the release of funds to Region 18.

Miles Lucero seconded the motion.

Unanimously approved with Aaron Miltenberger abstaining

Terrence Gordon moved to recommend the release of funds to Region 19.

Aaron Miltenberger seconded the motion.

Unanimously approved with Miles Lucero abstaining

Collectively, these actions resulted in the committee recommending just under \$7.5 million in funding across the seven regions, which ORU staff stated would be forwarded to the full COAC for consideration at the October 2 meeting.

Infrastructure Share Round 4

ORU staff described a set of proposed process improvements and application updates for Round 4 of the Infrastructure Share intended to respond to lessons learned in previous rounds and feedback from evaluators and COAC members. These changes included expanding public office-hours sessions from one to four to better support first-time and new applicants, adopting Salesforce as the official portal for application submission to reduce staff time and streamline document management, and increasing the total number of evaluators to reduce individual reviewer workload.

ORU staff also recommended modifying narrative questions so that applicants would more clearly describe how their proposed projects would serve underserved, rural, and disproportionately impacted communities, how implementing organizations were embedded in those communities, and how they would design and use evaluation and data-collection strategies. They explained that, instead of requiring applicants to select standardized OSPRI indicators as in Round 3, the new approach would allow greater flexibility—especially for capital projects—while still ensuring that applicants thoughtfully articulated their evaluation logic and metrics.

Committee members discussed the implications of these changes, particularly around capacity and organizational status. Aaron Miltenberger expressed interest in ensuring that implementing organizations

were established entities or working under the fiscal sponsorship of established organizations, especially given the scale and multi-year nature of infrastructure grants. ORU staff noted that the application would now explicitly ask whether implementing organizations were registered with the Secretary of State and in good standing, and would also collect annual operating budgets and funding sources.

Terrence Gordon emphasized that the evaluation process already required reviewers to assess organizational capacity and suggested that guidance to applicants highlight expectations around track record, time in existence, and demonstrated accomplishments. ORU staff agreed that the changes aimed to balance openness to new partnerships with protections to promote accountability and organizational stability.

ORU staff next previewed the proposed funding range for Infrastructure Share Round 4. They recommended that the COAC consider authorizing between \$8 million and \$12 million in awards, explaining that the infrastructure share fund balance remained strong and continued to receive annual payments, that application volume had increased from fewer than 15 applications in early rounds to 43 eligible applications in Round 3, and that reductions in federal and state funding had increased demand for funding for behavioral health organizations.

In tandem with the overall funding range, ORU staff proposed adjusting the maximum recommended award size. They suggested setting a maximum request amount of \$750,000 per application, up from \$500,000 in previous rounds, to better support capital-intensive initiatives and to align with similar state-share practices. Staff clarified that this would function as a “soft cap”: applications could technically request more than \$750,000 if they provided advance notice and justification, consistent with the approach used in earlier rounds. Aaron Miltenberger commented that the written language should clearly distinguish between a maximum and a flexible cap so that applicants did not find the guidance contradictory, while Commissioner Kerr expressed support for maintaining flexibility and observed that sophisticated applicants would likely contact staff if considering a request above the stated maximum.

ORU staff then presented proposed revisions to the scoring rubric used by the evaluation committee. They described a new “application profile” section that would appear at the top of each evaluation packet, summarizing the request amount, implementing organizations, geographic profile, and standardized county-level indicators of need for easy reference by reviewers. ORU staff also outlined additional scoring criteria meant to mirror the funding priorities previously adopted in the infrastructure share policy.

These included questions about whether applications demonstrated collaboration among regional opioid abatement councils, local governments, and state agencies; whether funding requests aligned with or supplemented other opioid-related funding streams or provided match or in-kind contributions; the degree to which projects served underserved, rural, and disproportionately impacted communities; whether applicants had made meaningful efforts to engage regional councils; and the quality of program strategy, evaluation plans, and data-collection methods. ORU staff noted that existing weighting of rubric sections reflected prior practice but could be revisited.

Indirect Costs

ORU staff led a discussion on indirect costs for Infrastructure Share awards. They explained that while the MOU clearly capped administrative costs at 10% of allocations, it did not explicitly address indirect costs, and that historically administrative and indirect costs had not been fully distinguished. ORU staff presented a comparison of other states’ approaches and outlined three options: a 5% cap, a 10% cap, or a 15% cap (aligned with the federal de minimis standard). Staff recommended a 10% indirect cost cap as a middle-ground that reflected common practice in other states, fell below the federal de minimis rate, and still preserved a strong focus on directing funds to direct services.

Committee members expressed differing views. Terrence Gordon indicated that he would favor a lower cap, such as 5%, to maximize the proportion of funds going directly to programming, and stated that he did not believe a lower threshold would deter applicants from seeking funds. Aaron Miltenberger advocated for the

10% option, emphasizing that rural organizations often face higher per-unit administrative costs due to a lack of economies of scale and that realistic support for indirect expenses is important for sustainability and compliance.

ORU staff also discussed options for defining the base used to calculate indirect costs, including limiting the base to personnel costs rather than total costs for capital-heavy projects, and noted that some states treat certain typical indirect expenses as direct costs under clearly defined guidance. Finally, ORU staff recommended that the COAC not recognize federally negotiated indirect cost rates, which can be significantly higher than 15%, to avoid disproportionate overhead and inequities between applicants.

The Committee agreed to bringing these questions to the full COAC for determination.

Public Comment

No public comments were made.

Adjourn