

Cynthia Coffman, Esq.  
Attorney General of the State of Colorado  
Ralph L. Carr Colorado Judicial Center  
1300 Broadway, 10<sup>th</sup> Floor  
Denver, Colorado 80203

November 17, 2015

Re: Master Plan of Conversion, Total Community Options, Inc. d/b/a InnovAge

Dear Attorney General Coffman:

The undersigned organizations and individuals have an interest in ensuring that the charitable purpose for which InnovAge was originally created is preserved for the benefit of the community. As nonprofit organizations working on behalf of Colorado health care consumers, people with disabilities, people with chronic illnesses and the elderly, we are deeply concerned about the impact of the planned InnovAge conversion from nonprofit to for-profit status on the vulnerable, elderly and disabled individuals InnovAge serves. Further, we are concerned that the information provided in the Master Plan of Conversion (Conversion Plan) about the future conversion foundation, is not sufficient for us to understand the plans for proposed conversion foundation and whether it will satisfactorily continue the charitable purpose of the former nonprofit and maximize the benefit to the community.

Therefore, the undersigned organizations respectfully request the following information regarding the InnovAge Plan of Conversion (Conversion Plan):

- 1) Information regarding the intended mission statement for the conversion foundation.
- 2) Any draft by-laws or articles of incorporation for the planned conversion foundation.
- 3) Details for how the community board will be selected and appointed.

Additionally, we believe this conversion represents an important opportunity to set high standards for the protection of the community interest. We request that a public hearing that allows members of the community to be heard should be scheduled for the following reasons:

- 1) The proceeds of this conversion are considerable, and the distribution of proceeds should be subject to community input;
- 2) The population InnovAge serves is vulnerable,
- 3) This is the first nonprofit to for-profit conversion of a provider of Program for All Inclusive Care for the Elderly services, we request that the Attorney General create an opportunity for public hearing.

Sincerely,

Adela Flores-Brennan  
Executive Director  
Colorado Consumer Health Initiative

Eileen Doherty, MS  
Executive Director  
Colorado Gerontological Society

M. Jean Nofles

Linda Skafien  
Executive Director  
The Arc of Adams County

Julie Reiskin  
Executive Director  
Colorado Cross-Disability Coalition