

Child Protection Updated Formula

Children and Family Services Administration

December 2016

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I. Executive summary

Laws of Minnesota 2015, Chapter 71, require the Minnesota Department of Human Services (department) to evaluate the Child Protection Grant Allocation formula in Minnesota Statutes, section 256M.41, and recommend an updated equitable distribution formula beginning in fiscal year 2018.

Background and context information related to county child protection funding, expenditures, staffing and performance are provided.

Recommendations

Department staff recommend that:

- Contingent on the legislature giving the commissioner of human services authority to direct investments in county child protection performance improvement, the legislature should eliminate the 20 percent Child Protection Grant Allocation performance withhold and fully appropriate 100 percent of the funds to counties in July of each year using the existing formula.
- 2. The legislature authorize the commissioner to set child protection measures and standards.
- 3. The legislature authorize the commissioner to require an under-performing county to demonstrate that it has designated sufficient funds and implemented a reasonable strategy to improve performance, including the provision of a performance improvement plan and additional remedies identified by the commissioner.
- 4. The legislature should authorize the commissioner to re-direct up to twenty percent of funds under this section toward the program improvement plan for a county not meeting criteria and not demonstrating significant improvement.
- 5. Further discussions with tribes that formally take on child protection responsibilities under Minnesota Statutes 256.01, subd. 14(b), be conducted as to whether such tribes:
 - Should be included in the state allocation process and related performance requirements, or
 - The current appropriation under Minnesota Statutes 256E.28 of \$75,000 per eligible tribe be increased to a value reflective of the formula.

II. Legislation

Laws of Minnesota 2015, Chapter 71, article 1:

Sec. 124. Child Protection Updated Formula.

The commissioner of human services shall evaluate the formulas in Minnesota Statutes, section 256M.41, and recommend an updated equitable distribution formula beginning in fiscal year 2018, for funding child protection staffing and expanded services to counties and tribes, taking into consideration any relief to counties and tribes for child welfare and foster care costs, additional tribes delivering social services, and any other relevant information that should be considered in developing a new distribution formula. The commissioner shall report to the legislative committees having jurisdiction over child protection issues by December 15, 2016.

III. Introduction

This report is prepared for the Minnesota Legislature pursuant to Laws of Minnesota 2015, Chapter 71, which directed the commissioner of the Minnesota Department of Human Services to evaluate the Child Protection Grant Allocation formula in Minnesota Statutes, section 256M.41, and recommend an updated equitable distribution formula beginning in fiscal year 2018. This includes funding for child protection staffing and expanded services to counties and tribes, taking into consideration relief to counties and tribes for child welfare and foster care costs, additional tribes delivering social services, and other relevant information that should be considered in developing a new distribution formula. This legislatively-required report is due December 15, 2016.

A related report is due January 2018, per Minnesota Statutes 256M.41, subd. 3(c), which requires the commissioner to work with stakeholders and the Human Services Performance Council under section 402A.16 to develop recommendations for specific outcome measures that counties should meet in order to receive performance funds withheld, and include in those recommendations a determination as to whether performance measures should be modified or phased out. This work has not yet begun, and any decisions made by the legislature based on this 2016 report that impact either the performance withhold or the performance measures will impact the 2018 report.

Background and context on the current status and recent trends of county spending on child welfare staffing and services are provided, as well as options and recommendations for changes to the Child Protection Allocation formula.

A. Background

As described in the Governor's Task Force on the Protection of Children (Task Force) Final Report and Recommendations (March 2015), funding for child welfare services in Minnesota has relied primarily on county local property tax dollars (54 percent) and federal dollars (27 percent). The aggregate state share of child welfare costs has been 14 percent, one of the two lowest state shares in the country.

In reviewing Minnesota's historic trends, the Task Force noted that there was a significant reduction of \$41.8 million in annual funding from all sources of revenue when comparing 2013 to funding levels available to county agencies for child welfare activities in 2002. The heavy reliance on local property tax revenues has likely contributed to the wide variation in levels of county activities and provision of services.

One charge to the Task Force was to assess the adequacy of resources for child protection and identify what would be needed to implement its recommendations. Subsequent to the Task Force's review of current and past levels of financial resources available to support county implementation of child welfare services to children and families, the work group on resources analyzed projected cost estimates to implement preliminary recommendations and determined that current levels of funding are not adequate to address and improve provision of child welfare services.

Those cost estimates focused on:

- County staffing to carry out the additional responsibilities outlined in the recommendations
- Additional potential services necessary to support children and families as a result of changes in screening, assessment, etc.
- Additional state oversight.

Some criteria in the report suggested that the legislature consider:

- Increasing funding for county staffing to carry out additional case work responsibilities (i.e., county child protection workers, supervisors, and case aides)
- Funds be targeted to children and families in the child protection system while supporting state-wide consistency in provision of services
- Improving balance among federal, state and local funding shares, and
- Funding and fiscal incentives be directed toward outcomes at the child level.

During the 2015 legislative session, \$23,350,000 was appropriated annually to the Minnesota Department of Human Services (department) for allocation to county agencies for child protection staffing and services under Minnesota Statutes 256M.41. [See statute in Appendix A] The intent of the legislation was to improve current child protection worker caseloads so that more timely case work would occur to support children in need of protection. County agencies are prohibited from supplanting existing county funds with the funds appropriated; funds received must be used to address additional staffing for child protection or expand child protection services. [A list of child welfare services purchased by counties and county staffing activities in child welfare is in Appendix B]

Minnesota Statutes 256M.41, subd. 1, requires that the commissioner annually allocate state funds to each county board in an amount determined according to the following formula:

- Fifty percent must be distributed on the basis of the child population residing in the county as determined by the most recent data of the state demographer
- Twenty-five percent must be distributed on the basis of the number of screened in reports of child maltreatment under sections 626.556 and 626.5561, and in the county as determined by the most recent data of the commissioner and
- Twenty-five percent must be distributed on the basis of the number of open child protection case management cases in the county as determined by the most recent data of the commissioner.

The statute specifies that no county be awarded an allocation of less than \$75,000 per year.

In addition to the allocation method, the statute also requires that the commission of human services determine whether counties met performance standards before providing the entire allocation annually.

County agencies receive 80 percent of their full allocation in July each year. However, 20 percent of the full allocation is retained until it is determined in January of the next calendar year that the agency met two requirements in the

previous calendar year. If the requirements are met, the remaining 20 percent is distributed in February. If requirements are not met, those remaining funds are re-distributed to county agencies meeting requirements.

The two performance measures are:

- Timely face-to-face contact with alleged child victims. Ten percent of a county agency's full allocation is withheld until the department determines if an agency met the performance outcome threshold of 90 percent based on face-to-face contact with alleged child victims. To receive the performance allocation, county child protection workers must have timely face-to-face contact with at least 90 percent of all alleged child victims of screened in maltreatment reports. The face-to-face contact with child and primary caregiver must occur immediately if sexual abuse or substantial child endangerment is alleged and within five calendar days for all other reports.
- Monthly caseworker visits. Ten percent of a county agency's full allocation is withheld until the department determines if an agency met the performance outcome threshold of 90 percent based on monthly face-to-face visits by case managers. To receive the performance allocation, the total number of visits made by caseworkers on a monthly basis to children in foster care and children receiving child protection services while residing in their home, must be at least 90 percent of the total number of such visits that would occur if every child were visited once per month. Note: For 2015 only, the legislature required that the department apply the standard only to monthly foster care visits, and not to visits to children residing in their home.

B. Recent trends in child protection cases

There has been a rapid rise in the number of children involved with child protection during the past two years.

- There was a 50 percent increase in the number of accepted maltreatment reports requiring an assessment or investigative response (from 4,979 reports in Q1 2014, to 7,484 in Q1 2016)
- A 49 percent increase in the number of child protection ongoing cases opened (from 1,252 cases opened in Q1 2014, to 1,861 in Q1 2016) and
- A 39 percent increase in the number of children in out-of-home care who require face-to-face contact by a caseworker (from 16,393 children in Q1 2014, to 22,852 children in Q1 2016).

The following graphic from the department's "Minnesota's Child Maltreatment Report 2015" provides trend data on accepted victims and reports in Minnesota over the past several years.

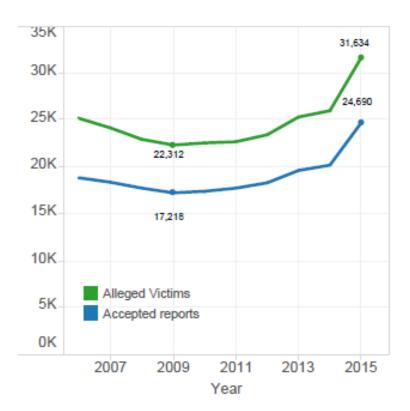


Figure 1: Trends of accepted reports and alleged victims, 2006 – 2015

As revealed in Figure 1, the number of accepted reports and alleged victims with at least one report has been on the rise, particularly since the Governor's Task Force on Child Protection issued its recommendations. This includes the:

- Most recent year saw a 22.4 percent increase in reports from 2014, and a 21.8 percent increase in alleged victims with at least one report
- Increase in reports means increased caseloads for a child protection system that is still funded at 2002 levels.

Additional public scrutiny, media attention and changes in statutes related to child protection, may all be a factor in this increase. As evidence of this change, the number of maltreatment reports being received from community members (both mandated and non-mandated reporters) has shown a steep increase since 2014. Additionally, the percent of maltreatment reports being accepted for further assessment has also increased (from 29.5 percent in 2014 to 33.2 percent in 2015).

C. Child protection staffing

Recent research by the University of Minnesota finds that case workers in Minnesota are feeling the strains of high caseloads. [Piescher, LaLiberte, and Goodenough, 2016] The state ultimately holds responsibility for the safety, permanency, and well-being of children in Minnesota yet local agencies hold a greater burden of paying for the cost of child welfare. This heavy reliance on the decisions of local financing leads to unpredictability and volatility in the investment of the child welfare workforce, causing great variability in local agencies' ability to meet performance standards set by federal and state governments.

The Governor's Task Force on the Protection of Children recommended a caseload ratio of 10 to one for child protection workers and eight to one for supervisors.

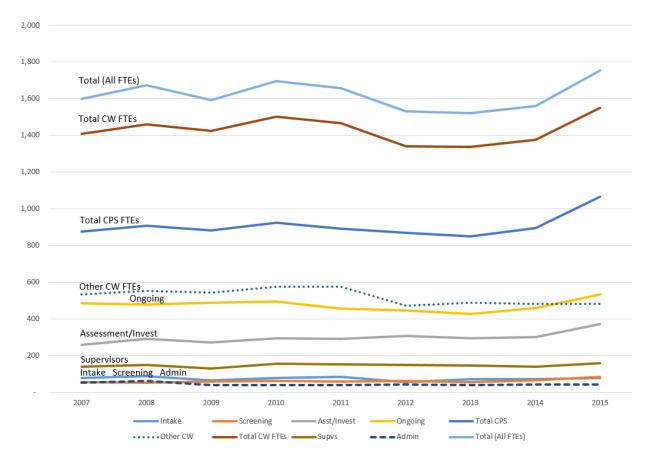


Figure 2: Child protection staffing: federal fiscal year 2007 – 2015

Definitions

Intake: Accepting phone calls, letters, electronic mail, facsimile (fax) or in-person reports of alleged child maltreatment, whether from mandated or voluntary reporters, and recording reporter's concerns.

Screening: Determining whether a reporter's concerns meet statutory definitions for alleged child maltreatment, the immediacy of response needed, the type of response that is most appropriate (family assessment or investigative), and/or the staff unit or member available and most appropriate to respond.

Assessment and investigation: Determining whether child maltreatment occurred and/or whether services are needed, including Family Assessment activities.

Ongoing child protective services: Services provided after the assessment and/or investigation process is completed which are intended to prevent or reduce the likelihood of maltreatment or its recurrence, including Family Assessment case management services. These services may include case management, with or without out-of-home placements and with or without court system involvement.

Other child welfare services: Child welfare services provided without a report of alleged child maltreatment. This includes the entire range of services, both out-of-home care and home-based services provided by staff, intended to enhance family functioning. Child welfare services do not include supportive services solely for the purpose(s) of enhancing the care of children with special emotional (ED/SED) or developmental (DD) needs.

Source: Child protection workforce survey of full-time equivalents for National Child Abuse and Neglect Data Systems

Table 1: Child Protection Positions by Federal Fiscal Year

Activity	2007	2008	2009	2010	2011	2012	2013	2014	2015
Intake	77	87	64	77	83	55	71	71	78
Screening	55	51	60	62	60	63	56	65	84
Asst/Invest	259	292	272	293	291	306	294	300	371
Ongoing	485	478	487	493	457	445	428	459	534
Total CPS	876	908	883	925	891	869	849	895	1,067
Other CW	532	553	543	576	575	471	487	481	483
Total CW FTEs	1,408	1,461	1,426	1,501	1,466	1,340	1,336	1,376	1,550
Supvs	138	149	130	157	151	150	147	140	160
Admin	52	63	38	38	40	41	39	43	44
Total (All FTEs)	1,598	1,673	1,594	1,696	1,657	1,531	1,522	1,559	1,754
% Total CPS to Total (All FTEs)	55%	54%	55%	55%	54%	57%	56%	57%	61%
% Total CPS to Total CW	62%	62%	62%	62%	61%	65%	64%	65%	69%
% Total CW to Total (All FTEs)	88%	87%	89%	89%	88%	88%	88%	88%	88%
% Supvs/Admin to Total (All FT	12%	13%	11%	11%	12%	12%	12%	12%	12%
% Supvs to Total CW FTEs	10%	10%	9%	10%	10%	11%	11%	10%	10%

Source: Child protection workforce survey of full-time equivalents for National Child Abuse and Neglect Data Systems

D. Child welfare expenditures and revenues

The following chart represents the statewide child welfare expenditures by category over the most recent 11 quarters and reflect a rapid rise in expenditures. [See Appendix C for a table of actual expenditures.] These expenditures reflect county spending on these categories from both local, state, federal and miscellaneous revenue sources.

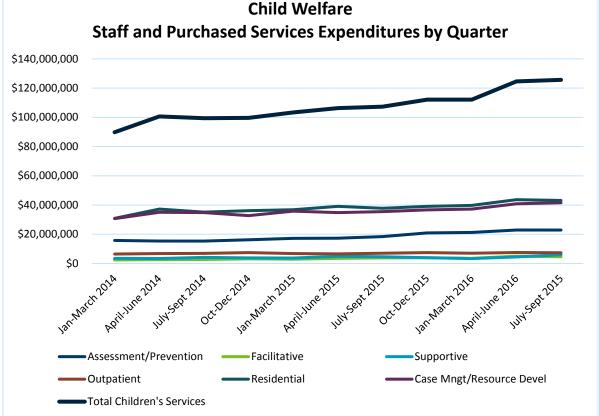
Total calendar year expenditures for these activities have increased as follows:

- CY 2013: \$387,469,364
- CY 2014: \$390,050,946 (0.7% increase from prior year)
- CY 2015: \$429,137,161 (10.0% increase from prior year)

If the first three quarters of CY 2016 actual expenditures were prorated to reflect an entire year, CY 2016 would be at least \$483 million. (13 percent increase from prior year).

Child Welfare Staff and Purchased Services Expenditures by Quarter

Figure 3: Chart of child welfare expenditures: January 2014 - September 2016



Source: Minnesota Department of Human Services, Social Services Expenditure and Grant Reconciliation Report (SEAGR). Details expenditures and units of service by individual Budgeting, Reporting and Accounting for Social Services (BRASS) service codes for each program. Manual of Services and Definitions for the Minnesota Standard Social Service Classification Structure. Social Services Information System (SSIS) uses BRASS codes as basis for tracking county social service activity. See Appendix C for actual quarterly expenditures by category.

The following chart represents the statewide child welfare revenues by revenue source as identified in the Social Services Expenditure and Grant Reconciliation Report (SEAGR). For purposes of this analysis, state categorical revenues and state appropriations for the Vulnerable Children and Adult Act apportioned for child welfare services were combined. As well, federal categorical revenues and the federal Social Services Block Grant apportioned for child welfare services were combined.

Table 1: Child welfare revenue sources by calendar year

Revenue	CY 2012	CY 2013	CY 2014	CY 2015	Prorated CY 2016*	
County	\$202,683,556	\$208,823,068	\$205,153,309	\$214,747,354	\$234,172,793	
Federal	\$97,576,422	\$103,939,036	\$102,084,451	\$107,188,127	\$117,136,174	
State	\$56,052,927	\$56,350,689	\$67,518,997	\$89,550,049	\$112,816,196	
Misc	\$17,621,412	\$18,356,571	\$15,294,189	\$17,651,631	\$18,943,563	
Total	\$373,934,317	\$387,469,364	\$390,050,946	\$429,137,161	\$483,068,725	
Percentage						
County	54%	54%	53%	50%	48%	
Federal	26%	27%	26%	25%	24%	
State	15%	15%	17%	21%	23%	
Misc	5%	5%	4%	4%	4%	
Total	100%	100%	100%	100%	100%	

^{*}Footnote: Prorated CY 2016 represents first three quarters of actual data and estimated fourth quarter.

Unlike many states, Minnesota has a heavy reliance on local property tax revenues to support child welfare expenditures and that is still occurring in spite of the recent state appropriations for child protection staffing and services.

Based on a review of both the number of reports of child abuse and neglect, the change in county staffing, and the increased expenditures in child protection activities, department staff observes that additional state allocations provided to counties in the 2015 session may not be sufficient to provide county workers with reasonable caseloads and be responsive to children, given the recent rapid increase in the number of children coming into the child protection system, as well as additional service dollars needed to support families in crisis. Additional state funds for child abuse prevention activities should also be considered.

E. Vulnerable Children and Adults Act

It should be noted that counties also receive other state and federal funds under Minnesota Statutes 256M. [See statute in Appendix A] The 2011 Minnesota Legislature created the Vulnerable Children and Adults Act (VCA), establishing a fund to address the needs of vulnerable children and adults. This act revised and renamed the previous Children and Community Services Act [2011 Laws of Minnesota, First Special Session, Chapter 9] and the legislature decreased state appropriations during this conversion.

Counties currently receive annual VCA allocations of \$55.8 million in state appropriations and \$30 million in federal Title XX funds under the Social Security Act. Services are to be provided or arranged for by county boards for vulnerable children and adults under Minnesota Statutes 260C (child protection), 626.556 (reporting of maltreatment of minors), 626.5561 (reporting of prenatal exposure to controlled substances), and 626.557 (reporting of maltreatment of vulnerable adults), who experience dependency, abuse or neglect, and services for family members to support those individuals. They do not include services under the public assistance programs known as the Minnesota Family Investment Program, Minnesota Supplemental Aid, Medical Assistance, General Assistance, General Assistance, Medical Care, MinnesotaCare or Community Health.

The VCA allocation formula under 256M.40 to counties is based on the following factors:

- 75 percent on basis of county share in calendar year 2012
- 5 percent on number of persons residing in the county
- 10 percent on number of vulnerable children that are subjects of reports under chapter 260C and sections 626.556 and 626.5561, and in the county
- 10 percent on number of vulnerable adults that are subjects of reports under section 626.557 in the county.

By law, the commissioner of human services is precluded from changing the formula under 256M.40 or recommending a change to the legislature without public review and input.

F. Performance management

The legislature has a process to address county performance. The 2009 legislature passed the State-County Results, Accountability and Service Delivery Reform Act [Minnesota Statutes Chapter 402A], which established a Steering Committee on Performance and Outcome Reforms. The committee's purpose was to establish a list of essential human services (mandated by federal or state government), as well as to establish minimum outcome standards for those services and to develop a uniform data collection and review process.

The steering committee presented recommendations to the legislature in December 2012, authorized by the legislature during the 2013 session. Minnesota Statutes, section 402A.14, establishes "a performance management system for essential human services ... that includes initial performance measures and standards consistent with the recommendations of the steering committee."

Human Services Performance Council

The Human Services Performance Council was authorized by the 2013 Minnesota Legislature as part of establishment of a performance management system for human services. The work of the council is to advise the commissioner of the Minnesota Department of Human Services on the implementation and operation of the human services performance management system, including county performance management and departmental procedures, and to provide annual reviews and reports to the legislature related to human services performance management. [Minnesota Statutes, section 402A.15].

Under the Act, the commissioner has power to remedy failure to meet performance outcomes. If the commissioner determines that a county is deficient in achieving minimum performance thresholds for a specific essential human services program, the commissioner may impose the following remedies and adjust state and federal program allocations accordingly:

- Voluntary incorporation of the administration and operation of the specific essential human services program with another county
- Mandatory incorporation of the administration and operation of the specific essential human services program with another county or
- Transfer of authority for program administration and operation of the specific essential human services program to the commissioner.

Before imposing any remedies, the commissioner must notify county that it must submit a performance improvement plan if it:

- Does not meet the minimum performance threshold for a measure or
- Has a performance disparity for a racial or ethnic subgroup, even if the county or service delivery authority met the threshold for the overall population.

The county may negotiate the terms of a performance improvement plan with the commissioner.

When the department determines that a county does not meet the minimum performance threshold for a given measure, the commissioner must advise the county that fiscal penalties may result if performance does not improve. The department must offer technical assistance to the county. Within 30 days of the initial advisement from the department, the county may claim, and the department may approve, an extenuating circumstance that relieves the county of any further remedy.

If there are no extenuating circumstances, a county must submit a performance improvement plan to the commissioner within 60 days of the initial advisement from the department. The term of the performance improvement plan must be two years, and the plan must include a target level for improvement for each measure that did not meet the minimum performance threshold. The commissioner must approve the performance improvement plan within 60 days of submittal.

The department must monitor the performance improvement plan for two years. After two years, if a county meets the minimum performance threshold, there is no further remedy. If a county fails to meet the minimum performance

threshold, but meets the improvement target in the performance improvement plan, it must modify the performance improvement plan for further improvement and the department shall continue to monitor the plan.

If, after two years of monitoring, a county fails to meet both the minimum performance threshold and the improvement target identified in the performance improvement plan, the next step of the remedies process may be invoked. This phase of remedies may include:

- Fiscal penalties for a county that do not exceed 1 percent of it's human services expenditures and negotiated in the performance improvement plan, based on what is needed to improve outcomes. Counties must reinvest the amount of a fiscal penalty into the essential human services program that was underperforming. A county shall not be required to pay more than three fiscal penalties in a year and
- Provision of technical assistance by department staff to a county that is targeted to address the specific performance issues.

The commissioner shall continue monitoring the performance improvement plan for a third year.

If, after the third year of monitoring, a county meets the minimum performance threshold, there is no further remedy. If a county fails to meet the minimum performance threshold, but meets the improvement target for the performance improvement plan, it shall modify the performance improvement plan for further improvement and the department shall continue to monitor the plan.

If, after the third year of monitoring, a county fails to meet the minimum performance threshold and the improvement target identified in the performance improvement plan, the Human Services Performance Council shall review the situation and recommend a course of action to the commissioner.

If the commissioner has determined that a program has a balanced set of program measures and a county is subject to fiscal penalties for more than one-half of the measures for that program, the commissioner may apply further remedies as described above.

G. Performance indicators

The following graphics provide state trend data and county-by-county data on the two performance measures. Updated information is on the Child Welfare Data Dashboard.

Figure 4: Four-year trend on timeliness, 2013-2016 (thru October 2016)

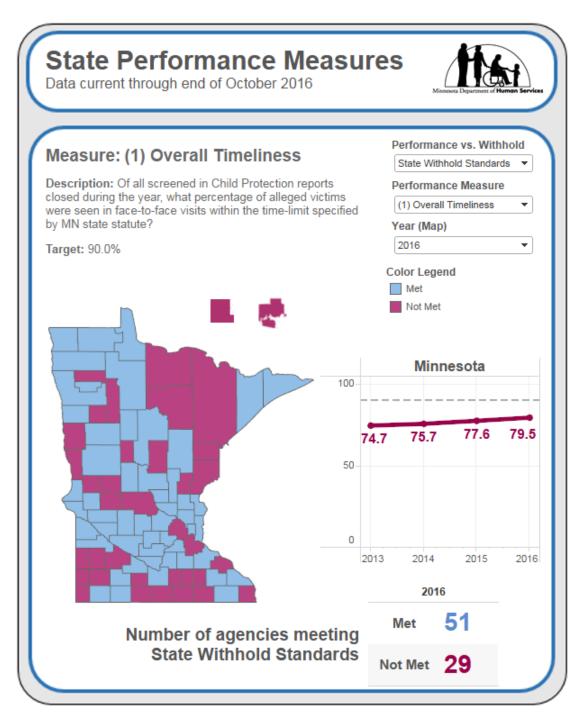
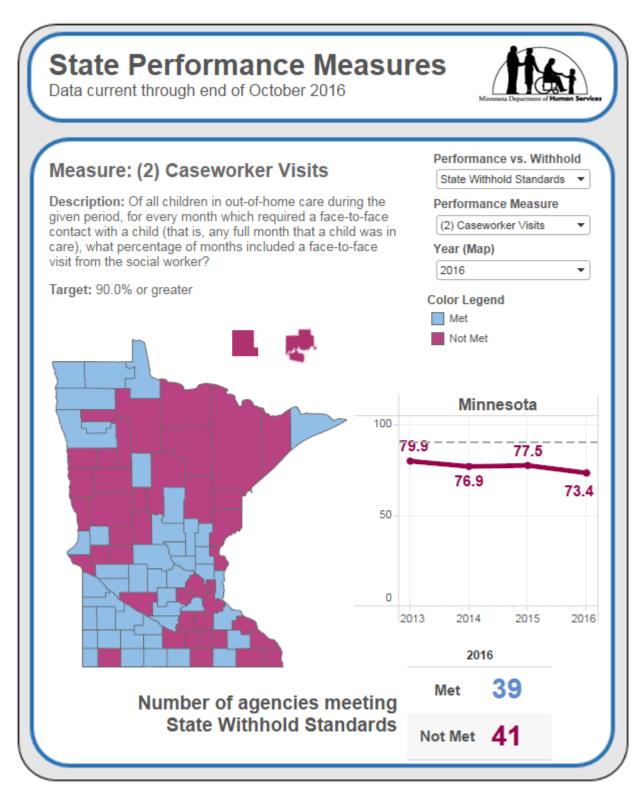


Figure 5: Four-year trend on monthly case worker visits, 2013-2016 (thru October 2016)



As can be seen, steady improvement on timeliness has occurred but there has been a drop in performance for monthly case worker visits.

IV. Alternatives to existing formula

Several options for consideration by the legislature in updating the Child Protection Grant Allocation formula under 256M.41, include:

- Modify performance requirements
- Review allocation model
- Review guaranteed floor
- Allocate funds to tribes who provide child protection services as well as to counties.

Department staff reviewed options and possible modifications for the formula, worked with representatives of the Minnesota Association of County Social Services Administrators (MACSSA) and tribal representatives, to analyze the current formula, and discussed options and decision points for consideration.

A. Modify performance requirements

Considerations regarding modification of performance requirements include:

a. Performance withhold requirements could be eliminated.

County agency staff have indicated that they have several concerns with the current withhold requirements, including:

- They can't rely on receiving 20 percent of the allocation, making it difficult to hire permanent staff with the funds.
- There are unique situations that impact the data and vary by county.
- Data quality is impacted by available time for county workers to input data due to caseloads and the number of new requirements.
- The state-county data system needs improvement.
- Counties need time to hire and train new staff so that performance can be improved.
- County management also needs time to understand and adopt the new changes in law and practice guides as a result of Task Force recommendations.

Advocates may be concerned about whether outcomes would improve without the focus on performance requirements. If county performance isn't incentivized to see children in a timely and regular manner, child safety may be compromised.

The legislature could consider giving the commissioner of human services more authority to direct the county agency use of the child protection funds and to require program improvement plans to address poor performance on child protection measures.

b. The performance withhold measures could be modified.

County agencies have requested that the monthly caseworker visits standard continue the limitation applied in 2015 only. Namely, that the standard applies only to monthly foster care visits, and not to visits to children residing in their home. This recommendation was included in the governor's Health and Human Services budget bill in 2016, Senate File 3332, but was not adopted. County agency staff have been concerned that the measure is difficult to operationalize given the complexity of cases, circumstances, variability across counties, and lack of transparency to track the measure over time.

Advocates may be concerned that children's safety is at stake if they aren't seen in a regular manner by county social workers to assess the conditions of family homes.

As such, the legislature could consider giving the commissioner of human services more authority to select the child protection measures and the standards.

c. Performance funds could be fully distributed in July each year with the base allocations.

County agency staff have indicated it would be more beneficial to have the funds upfront to support staff costs; accounting and auditing gets more difficult when performance funds fall in the next calendar year.

Options include:

- 1. One approach would be for the department to award the full allocation in July to a county and claw back that portion of the performance withhold that a county agency did not achieve in the next year's allocation.
- 2. Another approach would be to require a fiscal penalty of a certain amount (e.g., a fixed amount or a percentage of the allocation) of local funds if a particular measure was not achieved.
- 3. A third consideration is to require a county agency to provide an additional county match of a like size for any measure where it has not achieved performance standards.

County representatives suggested that the department use the existing processes and penalties outlined under Minnesota Statutes 402A (State-County Results, Accountability and Service Delivery Reform Act) rather than create a separate process.

The legislature could consider giving the commissioner of human services more authority to re-direct up to twenty percent of funds toward a program improvement plan for a county not meeting criteria and not demonstrating significant improvement.

B. Review allocation model

The current formula weighting is as follows:

- 50 percent on child population
- 25 percent on screened-in reports of child maltreatment and
- 25 percent on open child protection case management cases.

These factors take into consideration the underlying population of children who may come to the attention of the county agency, those children who are determined to have been abused or neglected, and children who require ongoing monitoring and support.

There appears to be general support of the factors and weighting of the factors for purposes of the funds in discussions with county representatives. One larger county representative suggested removing the child population measure to focus on the presenting issues of intake and case management, but the child population measure stabilizes the allocations from year to year. Smaller county agencies who have relatively large changes in screened in reports and open child protection cases from year to year would not have the stable funding source necessary to assure a full-time permanent child protection staff. It was reflected in discussions with county representatives that it would be difficult to achieve consensus on any new formula changes given the variety of county demographic characteristics, tax capacity and child protection cases across Minnesota. Without additional funds, a different formula would just move funds among county agencies, creating different "winners" and "losers."

C. Review guaranteed floor

The legislature could either eliminate or change the value of the guaranteed floor. Twenty-eight small county agencies benefited from the guaranteed floor requirements, which permitted them to hire the equivalent of a full-time child protection worker to address the additional requirements implemented by the legislature. The department has not heard of county agency concerns with the adoption of the guaranteed floor as part of the requirements: County representatives from smaller counties appreciated the ability to hire at least one new child protection worker, which has allowed them to have back-up staff and a second set of eyes on cases, when needed.

D. Allocate funds to tribes who provide child protection services

Both Leech Lake Band of Ojibwe and White Earth Nation are part of the American Indian Child Welfare Initiative under Minnesota Statutes 256.01, subd. 14b. [American Indian child welfare projects] Each of these tribes has taken on responsibility for tribal delivery of child welfare services to American Indian children and their parents and custodians living on the reservation. State appropriated grants of \$4.75 million annually are currently divided among the participating tribes to support the projects. These are fixed appropriations and a formula is not used to determine the annual appropriation.

The commissioner has authority to solicit and determine which tribes may participate in the Initiative. Currently, Mille Lacs Band and Red Lake Band of Ojibwe have received legislatively-appropriated one-time state planning grants of \$400,000 each for potential inclusion in the American Indian Child Welfare Initiative.

The Child Protection Grant allocation formula under 256M.41 could be modified to include allocations to tribes participating in the American Indian Child Welfare Initiative. Currently, under Minnesota Statutes 256E.28, subd. 7, tribes participating in the American Indian Child Welfare projects each are awarded \$75,000 annually to assist in carrying out the additional child protection requirements enacted by the legislature. This represents a value comparable to the county guaranteed floor under 256M.41.

Tribal representatives from White Earth suggested that if the county allocation were applied to them they would have received more than the \$75,000 allocated by the legislature. Using data from 2015, the department estimates that White Earth would have received \$134,000 and Leech Lake \$108,000, if the county allocation applied to both tribes. However, if performance requirements also applied to the two tribes, they would not have received the full amount for the year given their performance on the two measures.

In discussion with county representatives, they requested that additional funds be allocated to tribes for these purposes under Minnesota Statutes 256E.28, subd. 7, rather than be incorporated into the existing formula and appropriation since county representatives believe the state is not fully funding the staffing necessary to carry out the recent legislative changes on county child protection requirements.

V. Report recommendations

After review and consideration, department staff recommends the following:

- Contingent on the legislature giving the commissioner of human services authority to direct investments in
 county child protection performance improvement, the legislature should eliminate the 20 percent child
 protection grant allocation performance withhold and fully appropriate 100 percent of the funds to counties
 in July of each year using the existing formula.
- The legislature should authorize the commissioner to require an under-performing county to demonstrate
 that it has designated sufficient funds and implemented a reasonable strategy to improve performance,
 including the provision of a performance improvement plan and additional remedies identified by the
 commissioner.
- The legislature should authorize the commissioner to re-direct up to twenty percent of funds under this
 section toward the program improvement plan for a county not meeting criteria and not demonstrating
 significant improvement.

Department staff do not recommend making any changes to the existing formula:

- Fifty percent distributed on the basis of the child population residing in the county
- Twenty-five percent distributed on the basis of the number of screened in reports of child maltreatment in the county and
- Twenty-five percent distributed on the basis of the number of open child protection case management cases in the county.

These factors take into consideration the underlying population of children who may come to the attention of county and tribal agencies, those children who are determined to have been abused or neglected, and children who require ongoing monitoring and support. Having child population as a component provides stability to the year-to-year allocations.

By removing the performance withhold requirements, county agencies will have specific appropriations each year that they can count on when staffing and purchasing services for affected children and their families. Department staff recognizes that county agencies currently provide the greatest share of revenues through their local property tax to support child welfare expenditures.

Based on a review of both the number of reports of child abuse and neglect, the change in county staffing, and the increased expenditures in child protection activities, department staff observes that the additional state allocations provided to counties in the 2015 session may not be sufficient to provide county workers with reasonable caseloads and be responsive to children, given the recent rapid increase in the number of children coming into the child protection system, as well as additional service dollars needed to support families in crisis.

While recognizing that county performance cannot be improved easily or quickly, given the immediate need to respond to allegations of child maltreatment and to the care of children in the child protection system, the commissioner should be given authority to require an under-performing county to demonstrate that it has

designated sufficient funds and implemented a reasonable strategy to improve performance, including the provision of a performance improvement plan and additional remedies identified by the commissioner.

In addition, department staff also recommends that further discussions with tribes that formally take on child protection responsibilities under Minnesota Statutes 256.01, subd. 14(b), be conducted as to whether such tribes:

- Should be included in the state allocation process and related performance requirements, or
- The current appropriation under Minnesota Statutes 256E.28 of \$75,000 per eligible tribe be increased to a value reflective of the formula.

Ultimately, the legislature will need to determine whether the formula should be modified to address:

- "Actual need" for staffing and services as indicated by factors such as number of reports of child maltreatment, child maltreatment determinations, foster care placements, complexities in caseload, disparities in caseload, caseload sizes, etc.
- "Potential need" as indicated by factors such as number of children in county, children in poverty, reports of child maltreatment, etc.
- "Lack of available resources" as indicated by factors such as net tax capacity, property tax limits, percentage share of available state and federal funding, etc.
- "Performance" as indicated by data on relevant measures to incentivize particular behavior by county agencies.

The legislature will also need the formula to provide a relatively stable allocation to county agencies (and tribal agencies) over time so that the agencies can predict and count on funding that allows for a stable child protection workforce in order to address the immediate need to respond to allegations of child maltreatment and to the care of children in the child protection system.

VI. Appendix A: Existing legislation

[Note: See section 256M.41 for Child Protection Grant Allocation language]

2015 Minnesota Statutes 256M Vulnerable Children and Adults Act

256M.01 CITATION.

Sections 256M.01 to 256M.80 may be cited as the "Vulnerable Children and Adults Act." This act establishes a fund to address the needs of vulnerable children and adults within each county in accordance with a service plan entered into by the board of county commissioners of each county and the commissioner.

256M.10 DEFINITIONS.

Subdivision 1. **Scope**. For the purposes of sections 256M.01 to 256M.80, the terms defined in this section have the meanings given them.

- Subd. 2. **Vulnerable children and adults services**. (a) "Vulnerable children and adults services" means services provided or arranged for by county boards for vulnerable children under chapter 260C, and sections626.556 and 626.5561, and adults under section 626.557 who experience dependency, abuse, or neglect, as well as services for family members to support those individuals. These services may be provided by professionals or nonprofessionals, including the person's natural supports in the community. For the purpose of this chapter, "vulnerable children" means children and adolescents.
- (b) Vulnerable children and adults services do not include services under the public assistance programs known as the Minnesota family investment program, Minnesota supplemental aid, medical assistance, general assistance, general assistance medical care, MinnesotaCare, or community health services.
- Subd. 3. Commissioner. "Commissioner" means the commissioner of human services.
- Subd. 4. County board. "County board" means the board of county commissioners in each county.
- Subd. 5. [Repealed, 1Sp2011 c 9 art 1 s 35]
- Subd. 6. **Human Services Board**. "Human Services Board" means a board established under section 402.02; Laws 1974, chapter 293; or Laws 1976, chapter 340.

256M.20 DUTIES OF COMMISSIONER OF HUMAN SERVICES.

Subdivision 1. **General supervision**. Each year the commissioner shall allocate funds to each county with an approved service plan according to section 256M.40 and service plans under section 256M.30. The funds shall be used to address the needs of vulnerable children and adults. The commissioner, in consultation with counties, shall provide technical assistance and evaluate county performance in achieving outcomes.

Subd. 2. Additional duties. The commissioner shall:

- (1) provide necessary information and assistance to each county for establishing baselines and desired improvements on safety, permanency, and well-being for vulnerable children and adults;
- (2) provide training, technical assistance, and other supports to each county board to assist in needs assessment, planning, implementation, and monitoring of outcomes and service quality;
- (3) use data collection, evaluation of service outcomes, and the review and approval of county service plans to supervise county performance in the delivery of services;
- (4) specify requirements for reports, including fiscal reports to account for funds distributed;
- (5) request waivers from federal programs as necessary to implement this section; and
- (6) have authority under sections 14.055 and 14.056 to grant a variance to existing state rules as needed to eliminate barriers to achieving desired outcomes.
- Subd. 3. **Sanctions**. The commissioner shall establish and maintain a monitoring program designed to reduce the possibility of noncompliance with federal laws, regulations, and performance standards that may result in federal fiscal sanctions. If a county is not complying with federal law or federal regulation and the noncompliance may result in federal fiscal sanctions, the commissioner may withhold a portion of the county's share of state and federal funds for that program. The amount withheld must be equal to the percentage difference between the level of compliance maintained by the county and the level of compliance required by the federal regulations, multiplied by the county's share of state and federal funds for the program. The state and federal funds may be withheld until the county is found to be in compliance with all federal laws or federal regulations applicable to the program. If a county remains out of compliance for more than six consecutive months, the commissioner may reallocate the withheld funds to counties that are in compliance with the federal regulations.
- Subd. 4. **Corrective action procedure**. The commissioner must comply with the following procedures when reducing county funds under subdivision 3.
- (a) The commissioner shall notify the county, by certified mail, of the statute, rule, federal law, or federal regulation with which the county has not complied.
- (b) The commissioner shall give the county 30 days to demonstrate to the commissioner that the county is in compliance with the statute, rule, federal law, or federal regulation cited in the notice or to develop a corrective action plan to address the problem. Upon request from the county, the commissioner shall provide technical assistance to the county in developing a corrective action plan. The county shall have 30 days from the date the technical assistance is provided to develop the corrective action plan.
- (c) The commissioner shall take no further action if the county demonstrates compliance with the statute, rule, federal law, or federal regulation cited in the notice.
- (d) The commissioner shall review and approve or disapprove the corrective action plan within 30 days after the commissioner receives the corrective action plan.
- (e) If the commissioner approves the corrective action plan submitted by the county, the county has 90days after the date of approval to implement the corrective action plan.

(f) If the county fails to demonstrate compliance or fails to implement the corrective action plan approved by the commissioner, the commissioner may reduce the county's share of state or federal funds according to subdivision 3.

256M.30 SERVICE PLAN.

Subdivision 1. **Service plan submitted to commissioner**. Effective January 1, 2012, each county must have a service plan approved by the commissioner in order to receive funds. Counties may submit multicounty or regional service plans. Plans must be updated as needed to reflect current county policy and procedures regarding requirements and use of funds under this chapter.

- Subd. 2. **Contents**. The service plan shall be completed in a form prescribed by the commissioner. The plan must include:
- (1) a statement of the needs of the vulnerable children and adults who experience the conditions defined in section 256M.10, subdivision 2, paragraph (a), and strengths and resources available in the community to address those needs;
- (2) strategies the county will pursue to achieve the performance targets. Strategies must include specification of how funds under this section and other community resources will be used to achieve desired performance targets;
- (3) a description of the county's process to solicit public input and a summary of that input;
- (4) performance targets on statewide indicators for each county to measure outcomes of vulnerable children and adult's safety, permanency, and well-being. The commissioner shall consult with counties and other stakeholders to develop these indicators and collect baseline data to inform the establishment of individual county performance targets for the 2012-2013 biennium and subsequent years; and
- (5) a budget for services to be provided with funds under this section.
- Subd. 3. [Repealed by amendment, 1Sp2011 c 9 art 1 s 25]
- Subd. 4. **Information**. The commissioner shall provide each county with information and technical assistance needed to complete the service plan, including: information on child and adult safety, permanency, and well-being in the county; comparisons with other counties; baseline performance on outcome measures; and promising program practices.
- Subd. 5. Timelines. The service plan must be submitted to the commissioner by October 15, 2011.
- Subd. 6. **Public comment**. The county board must determine how citizens in the county will participate in the development of the service plan and provide opportunities for such participation. The county must allow a period of no less than 30 days prior to the submission of the plan to the commissioner to solicit comments from the public on the contents of the plan.
- Subd. 7. **Commissioner's responsibilities**. The commissioner must inform the county if the service plan has been approved. If the service plan is not approved, the commissioner must inform the county of any revisions needed for approval.

256M.40 GRANT ALLOCATION.

Subdivision 1. **Formula**. The commissioner shall allocate state funds appropriated under this chapter to each county board on a calendar year basis in an amount determined according to the formula in paragraphs (a) to (e).

- (a) For calendar years 2011 and 2012, the commissioner shall allocate available funds to each county in proportion to that county's share in calendar year 2010.
- (b) For calendar year 2013 and each calendar year thereafter, the commissioner shall allocate available funds to each county as follows:
- (1) 75 percent must be distributed on the basis of the county share in calendar year 2012;
- (2) five percent must be distributed on the basis of the number of persons residing in the county as determined by the most recent data of the state demographer;
- (3) ten percent must be distributed on the basis of the number of vulnerable children that are subjects of reports under chapter 260C and sections 626.556 and 626.5561, and in the county as determined by the most recent data of the commissioner; and
- (4) ten percent must be distributed on the basis of the number of vulnerable adults that are subjects of reports under section 626.557 in the county as determined by the most recent data of the commissioner.
- (c) The commissioner is precluded from changing the formula under this subdivision or recommending a change to the legislature without public review and input.
- Subd. 2. [Repealed, 1Sp2005 c 4 art 3 s 20]
- Subd. 3. **Payments**. Calendar year allocations under subdivision 1 shall be paid to counties on or before July 10 of each year.

256M.41 CHILD PROTECTION GRANT ALLOCATION.

Subdivision 1. Formula for county staffing funds. (a) The commissioner shall allocate state funds appropriated under this section to each county board on a calendar year basis in an amount determined according to the following formula:

- (1) 50 percent must be distributed on the basis of the child population residing in the county as determined by the most recent data of the state demographer;
- (2) 25 percent must be distributed on the basis of the number of screened-in reports of child maltreatment under sections 626.556 and 626.5561, and in the county as determined by the most recent data of the commissioner; and
- (3) 25 percent must be distributed on the basis of the number of open child protection case management cases in the county as determined by the most recent data of the commissioner.
- (b) Notwithstanding this subdivision, no county shall be awarded an allocation of less than \$75,000.

- Subd. 2. **Prohibition on supplanting existing funds**. Funds received under this section must be used to address staffing for child protection or expand child protection services. Funds must not be used to supplant current county expenditures for these purposes.
- Subd. 3. **Payments based on performance**. (a) The commissioner shall make payments under this section to each county board on a calendar year basis in an amount determined under paragraph (b).
- (b) Calendar year allocations under subdivision 1 shall be paid to counties in the following manner:
- (1) 80 percent of the allocation as determined in subdivision 1 must be paid to counties on or before July 10 of each year;
- (2) ten percent of the allocation shall be withheld until the commissioner determines if the county has met the performance outcome threshold of 90 percent based on face-to-face contact with alleged child victims. In order to receive the performance allocation, the county child protection workers must have a timely face-to-face contact with at least 90 percent of all alleged child victims of screened-in maltreatment reports. The standard requires that each initial face-to-face contact occur consistent with timelines defined in section626.556, subdivision 10, paragraph (i). The commissioner shall make threshold determinations in January of each year and payments to counties meeting the performance outcome threshold shall occur in February of each year. Any withheld funds from this appropriation for counties that do not meet this requirement shall be reallocated by the commissioner to those counties meeting the requirement; and
- (3) ten percent of the allocation shall be withheld until the commissioner determines that the county has met the performance outcome threshold of 90 percent based on face-to-face visits by the case manager. In order to receive the performance allocation, the total number of visits made by caseworkers on a monthly basis to children in foster care and children receiving child protection services while residing in their home must be at least 90 percent of the total number of such visits that would occur if every child were visited once per month. The commissioner shall make such determinations in January of each year and payments to counties meeting the performance outcome threshold shall occur in February of each year. Any withheld funds from this appropriation for counties that do not meet this requirement shall be reallocated by the commissioner to those counties meeting the requirement. For 2015, the commissioner shall only apply the standard for monthly foster care visits.
- (c) The commissioner shall work with stakeholders and the Human Services Performance Council under section 402A.16 to develop recommendations for specific outcome measures that counties should meet in order to receive funds withheld under paragraph (b), and include in those recommendations a determination as to whether the performance measures under paragraph (b) should be modified or phased out. The commissioner shall report the recommendations to the legislative committees having jurisdiction over child protection issues by January 1, 2018.

256M.50 FEDERAL GRANT ALLOCATION.

In federal fiscal year 2012 and subsequent years, money for social services received from the federal government to reimburse counties for social service expenditures according to title XX of the Social Security Act shall be allocated to each county according to section 256M.40, except for funds allocated for administrative purposes and migrant day care. Title XX funds must not be used for any expenditures prohibited by section 2005 of the Social Security Act and

all federal certification requirements under title XX must be met by counties receiving title XX funds under this chapter.

256M.60 DUTIES OF COUNTY BOARDS.

Subdivision 1. **Responsibilities**. The county board of each county shall be responsible for administration and funding of services as defined in section 256M.10, subdivision 1. Each county board shall singly or in combination with other county boards use funds available to the county under Laws 2003, First Special Session chapter 14, to carry out these responsibilities.

- Subd. 2. [Repealed, 1Sp2011 c 9 art 1 s 35]
- Subd. 3. Reports. The county board shall provide necessary reports and data as required by the commissioner.
- Subd. 4. **Contracts for services**. The county board may contract with a human services board, a multicounty board established by a joint powers agreement, other political subdivisions, a children's mental health collaborative, a family services collaborative, or private organizations in discharging its duties.
- Subd. 5. **Exemption from liability**. The state of Minnesota, the county boards, or the agencies acting on behalf of the county boards in the implementation and administration of children and community services shall not be liable for damages, injuries, or liabilities sustained through the purchase of services by the individual, the individual's family, or the authorized representative under this section.
- Subd. 6. **Fees for services**. The county board may establish a schedule of fees based upon clients' ability to pay to be charged to recipients of children and community services. Payment, in whole or in part, for services may be accepted from any person except that no fee may be charged to persons or families whose adjusted gross household income is below the federal poverty level. When services are provided to any person, including a recipient of aids administered by the federal, state, or county government, payment of any charges due may be billed to and accepted from a public assistance agency or from any public or private corporation.

256M.70 FISCAL LIMITATIONS.

Subdivision 1. [Repealed, 1Sp2011 c 9 art 1 s 35]

- Subd. 2. **Identification of services to be provided**. If a county has made reasonable efforts to provide services according to the service plan under section 256M.30, but funds appropriated for purposes of sections256M.01 to 256M.80 are insufficient, then the county may limit services that do not meet the following criteria while giving the highest funding priority to clauses (1) and (2):
- (1) services needed to protect individuals from maltreatment, abuse, and neglect;
- (2) emergency and crisis services needed to protect clients from physical, emotional, or psychological harm
- (3) services that maintain a person in the person's home or least restrictive setting;
- (4) assessment of persons applying for services and referral to appropriate services when necessary; and

(5) public guardianship services.

Subd. 3. **Denial, reduction, or termination of services due to fiscal limitations**. Before a county denies, reduces, or terminates services to an individual due to fiscal limitations, the county must meet the requirements in this section. The county must notify the individual and the individual's guardian in writing of the reason for the denial, reduction, or termination of services and must inform the individual and the individual's guardian in writing that the county will, upon request, meet to discuss alternatives before services are terminated or reduced.

256M.80 PROGRAM EVALUATION.

Subdivision 1. **County evaluation**. Each county shall submit to the commissioner data from the past calendar year on the outcomes and performance indicators in the service plan. The commissioner shall prescribe standard methods to be used by the counties in providing the data. The data shall be submitted no later than March 1 of each year.

Subd. 2. **Statewide evaluation**. Six months after the end of the first full calendar year and annually thereafter, the commissioner shall make public the counties' progress in improving the outcomes of vulnerable children and adults related to safety, permanency, and well-being.

VII. Appendix B: Child welfare staffing and service activities

County Staffing Activities in Child Welfare

Assessment and prevention services

- Child protection investigation
- Child welfare assessment
- Concurrent planning assessment
- Family assessment response
- Information and referral
- Long term care consultation
- Parent support outreach assessment

Outpatient services

- Family assessment response services
- Family group decision making
- Parent support outreach services
- Services for concurrent permanency planning

Case management/resource development

- Adoptions
- Family assessment case management
- General case management
- Specialized case management
- Licensing and resource development

Child Welfare Services Purchased by Counties

Facilitative services

- Court-related services/activities
- Health-related services
- Interpreter services
- Mental health screening
- Transportation

Supportive services

- Adolescent life skills training
- Consumer support grant
- Educational assistance
- Environmental accessibility adaptations
- Family support grant program
- Home-based support services
- Homemaking services
- Housing services
- · Independent living skills
- Legal services
- Social and recreational

Outpatient services

- Approved pilot projects
- Family assessment response services
- Family group decision making
- Family-based counseling services
- Family-based crisis services
- Family-based life management skills
- Group counseling
- Individual counseling
- Parent support outreach services
- Services for concurrent permanency planning

Residential services

- Child family foster care
- Child shelter
- Children's group residential care
- Correctional facilities
- Detention
- Relative custody assistance
- Respite care
- Supervised independent living (18 -21)
- Treatment foster care

Appendix C: Child welfare expenditures

Calendar Year Quarter by Quarter Statewide SEAGR Expenditure Comparisons for Child Welfare Services

	Jan-March 2014	April-June 2014	July-Sept 2014	Oct-Dec 2014	Jan-March 2015	April-June 2015	July-Sept 2015	Oct-Dec 2015	Jan-March 2016	April-June 2016	July-Sept 2016
Purchased Services											
Assessment/Prevention	\$399,991	\$611,126	\$638,432	\$638,278	\$409,716	\$699,326	\$647,595	\$747,298	\$595,949	\$765,998	\$816,707
Facilitative	\$1,834,148	\$2,049,072	\$2,218,655	\$2,580,827	\$2,383,151	\$2,928,314	\$3,168,139	\$3,312,868	\$2,746,220	\$4,158,666	\$3,598,030
Supportive	\$1,917,572	\$1,917,672	\$2,644,405	\$2,257,447	\$2,097,541	\$3,369,134	\$2,956,827	\$2,143,205	\$1,307,933	\$2,150,663	\$3,637,868
Outpatient	\$4,017,470	\$4,331,590	\$4,488,782	\$4,890,785	\$4,328,831	\$4,363,154	\$4,603,046	\$4,940,470	\$4,628,531	\$4,889,924	\$4,765,466
Residential	\$30,892,818	\$37,278,870	\$35,182,993	\$36,173,370	\$36,802,735	\$39,131,657	\$37,767,889	\$39,134,041	\$39,645,704	\$43,609,037	\$43,128,767
Case Management	\$2,347,818	\$6,595,138	\$6,305,216	\$4,484,704	\$5,405,220	\$4,977,433	\$4,852,911	\$4,014,847	\$4,855,373	\$5,423,884	\$4,815,657
Total	\$41,409,817	\$52,783,468	\$51,478,483	\$51,025,411	\$51,427,194	\$55,469,018	\$53,996,407	\$54,292,729	\$53,779,710	\$60,998,172	\$60,762,495
Staff Costs											
Assessment/Prevention	\$15,380,328	\$14,756,834	\$14,740,890	\$15,553,270	\$16,820,869	\$16,627,911	\$17,768,927	\$20,130,811	\$20,628,858	\$22,146,494	\$22,081,154
Facilitative	\$620,609	\$628,580	\$566,072	\$621,378	\$634,522	\$634,919	\$720,456	\$657,177	\$799,163	\$873,673	\$1,002,767
Supportive	\$1,584,913	\$1,508,922	\$1,566,285	\$1,589,988	\$1,610,815	\$1,590,502	\$1,655,904	\$1,790,418	\$2,065,414	\$2,340,741	\$2,360,715
Outpatient	\$2,458,571	\$2,508,038	\$2,482,035	\$2,560,431	\$2,467,891	\$2,205,097	\$2,436,328	\$2,517,157	\$2,397,444	\$2,646,352	\$2,625,510
Residential	\$0	\$0	\$0	\$0	\$0	\$0	\$39,396	\$0	\$60,214	\$64,143	\$64,412
Case Management	\$28,349,601	\$28,413,280	\$28,533,534	\$28,292,307	\$30,385,839	\$29,822,874	\$30,640,443	\$32,694,121	\$32,363,643	\$35,478,942	\$36,761,528
Total	\$48,394,022	\$47,815,654	\$47,888,816	\$48,617,374	\$51,919,936	\$50,881,303	\$53,261,454	\$57,789,684	\$58,314,736	\$63,550,345	\$64,896,086
Total Combined											
Assessment/Prevention	\$15,780,319	\$15,367,960	\$15,379,322	\$16,191,548	\$17,230,585	\$17,327,237	\$18,416,522	\$20,878,109	\$21,224,807	\$22,912,492	\$22,897,861
Facilitative	\$2,454,757	\$2,677,652	\$2,784,727	\$3,202,205	\$3,017,673	\$3,563,233	\$3,888,595	\$3,970,045	\$3,545,383	\$5,032,339	\$4,600,797
Supportive	\$3,502,485	\$3,426,594	\$4,210,690	\$3,847,435	\$3,708,356	\$4,959,636	\$4,612,731	\$3,933,623	\$3,373,347	\$4,491,404	\$5,998,583
Outpatient	\$6,476,041	\$6,839,628	\$6,970,817	\$7,451,216	\$6,796,722	\$6,568,251	\$7,039,374	\$7,457,627	\$7,025,975	\$7,536,276	\$7,390,976
Residential	\$30,892,818	\$37,278,870	\$35,182,993	\$36,173,370	\$36,802,735	\$39,131,657	\$37,807,285	\$39,134,041	\$39,705,918	\$43,673,180	\$43,193,179
Case Management	\$30,697,419	\$35,008,418	\$34,838,750	\$32,777,011	\$35,791,059	\$34,800,307	\$35,493,354	\$36,708,968	\$37,219,016	\$40,902,826	\$41,577,185
Total	\$89,803,839	\$100,599,122	\$99,367,299	\$99,642,785	\$103,347,130	\$106,350,321	\$107,257,861	\$112,082,413	\$112,094,446	\$124,548,517	\$125,658,581