

Department of Human Services CSL Reduction List

DEPARTMENT OF HUMAN SERVICES

Current Service Level Budget 2,560,416,359 418,647,985 3,607,750,362 6,586,814,706 7,460 7,358.14

Positions FTE

Priority	DIVISION	Reduction Description	GF	OF	FF	TF	BUDGET-POS	BUDGET FTE	Impact of Reduction on Services and Outcomes	Effective Date
1	Agency Wide	Agency Wide Reductions due to the \$28 million in statewide Management reduction target in 2011-13	(4,287,304)	(1,842,995)	(4,519,804)	(10,650,103)	(58)	(56.20)	Effective 7/1/13 position was taken as part of an LFO reduction. Package 081 May 2012 E-Board action.	7/1/2013
2	APD	K Plan Option - In-Home	\$(29,173,206)	\$-	\$29,173,206	\$-	-	-	No impact is anticipated.	7/1/2013
3	APD	K Plan Option - Community Facilities	\$(33,981,384)	\$-	\$33,981,384	\$-	-	-	No impact is anticipated.	7/1/2013
4	APD	Reinstate MFP	\$(770,180)	\$-	\$770,180	\$-	-	-	No impact is anticipated.	7/1/2013
5	APD	Reinstate NF Rates and Provider Tax	\$(18,724,663)	\$53,588,250	\$58,078,096	\$92,941,683	-	-	No impact is anticipated.	7/1/2014
6	APD	Decrease Nursing Facility Caseload	\$(19,043,254)	\$(1,826,568)	\$(35,594,637)	\$(56,464,459)	-	-	APD believes it can continue to decrease its nursing facility caseload below forecasted levels with continued diversion and transition efforts. Consumers are generally more satisfied with the home/ community based care placements received. However, continued decreasing caseloads threaten financial solvency of nursing facilities dependent upon Medicaid residents.	7/1/2013
7	SS	TANF - Continue Income Limit for Non-Needy Caretaker Relative families	\$(6,838,272)			\$(6,838,272)	-	-	This action maintains a TANF income limit of 185% of FPL for non-needy caretaker relative households (e.g. grandparents or other relatives caring for children in absence of parent). Prior to this action, the income of non-needy caretaker relatives was disregarded in determining eligibility for the TANF program. The income standard, now set at 185% of the FPL, means that approximately 1,650 families are not eligible for TANF cash assistance. These families can no longer rely on TANF to meet the needs of the children in their care and supervision and likely have had to rely on other resources. This reduction will reduce the amount of state expenditures that count toward its MOE obligations for TANF.	7/1/2013
8	SS	TANF - Continue "Job Quit" Penalty	\$(910,234)			\$(910,234)	-	-	This action maintains the requirement which makes families ineligible for TANF when the adult applying for TANF cash assistance, separates from his/her most recent job without good cause. Families ineligible for TANF due to job separation without good cause cannot access TANF for 120 days from the date of the job separation. This reduction effects an average of 25 cases per month.	7/1/2013
9	SS	ERDC - Continue Self Employment Closure	\$(1,971,022)			\$(1,971,022)	-	-	This action continues closed access to the Employment Related Day Care program to those families where the adult has declared they are self-employed. The ERDC Program helps working parents with an income below 185% of the Federal Poverty Level to access quality child care. (Many self-employed clients work in their home, and have more flexibility in working around children's schedules and in dealing with child care issues than those who are not self-employed.) This reduction effects an average of 155 cases per month.	7/1/2013
10	SS	ERDC - Continue Increased Co-Pay	\$(3,414,691)			\$(3,414,691)	-	-	This action maintains higher co-pays for families in the ERDC program. This action impacts low-income families' who have recently transitioned to employment from TANF. This reduction increased these families' chances of not being able to afford child care, putting their job at risk and limit the families' ability to find and keep stable, quality child care.	7/1/2013
11	SS	TANF - Continue Up Front Eligibility	\$(3,079,764)			\$(3,079,764)	-	-	This action maintains two additional eligibility requirements consisting of an employability assessment and JOBS orientation as a condition of TANF eligibility. Clients are required (unless otherwise exempt) to assist in the assessment of the individual's skills and work readiness and to attend an orientation (group or one-on-one) to develop an initial case plan. Refusal to assist the department in initial assessment, results in denial of TANF benefits. Individuals retain the right to decline screening for alcohol and drug, learning disabilities, mental health, and physical health related issues. This reduction effects an average of 328 cases per month.	7/1/2013
12	SS	TANF - Continue Pre-SSI/SSDI Enhanced Rate Reduction	\$(2,351,103)			\$(2,351,103)	-	-	This action maintains the State Family Pre-SSI/SSDI cash assistance grant at the same benefit levels as the TANF program. Prior to this reduction, families in the Pre-SSI/SSDI program received an enhanced payment which helped encourage parents with disabilities to apply for federal Supplemental Security Income benefits, taking them off of TANF. This reduction eliminated the enhanced grant resulting in fewer resources for individuals with disabilities. This reduction has impacted these families' ability to get needed medical supplies and other needs due to lower income. This reduction effects an average of 693 cases per month.	7/1/2013
13	SS	Post TANF - Continue Program Suspension	\$(3,046,627)			\$(3,046,627)	-	-	This action maintains the suspension of the Post TANF program which until April 2012, provided \$50 per month for up to one year to families transitioning from TANF to employment in order to support their families basic needs. While receiving these payments, the employment of these parents counted towards the federal work participation requirements. The Post TANF program helped ease the financial "cliff" as adults receiving TANF begin new jobs. Eliminating funding for Post TANF payments has had a negative effect on Oregon's federal work participation rates. This action also reduces the amount of state expenditures that count toward the TANF MOE obligations. This action affected approximately 2000 families.	7/1/2013
14	SS	SS - Reduce Inflation from Budget Build	\$(4,097,180)		\$(6,532,978)	\$(10,630,158)	-	-	Providers will not see any changes in funding available and less services will be available for programs.	7/1/2013
15	APD	Eliminate Inflation	\$(12,924,798)	\$(43,753)	\$(21,603,880)	\$(34,572,431)	-	-	For the most part, providers serving individuals in the Department's Aging and People with Disability programs have not had a COLA since July 2008. At the completion of this biennium, the total period without increases will be five years. Eliminating the COLA will stretch that time period to seven years. Medicaid access to long term care settings may be compromised as the private pay market improves.	10/1/2013

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16	DD	Eliminate Standard Inflation for all DD Programs	\$ (11,655,900)	\$ (783,592)	\$ (18,732,851)	\$ (31,172,343)			Effective 7/1/13 Eliminate COLA for all program areas in the developmental disability community based service system. Since 2001 there has only been one biennium where COLA was applied to services and program costs (07-09) The majority of costs in programs are staff related. There have been significant increases in insurance costs, and other general operating costs. Minimum wage has increased by statute and programs that used to pay well above minimum wage are now paying at or little above minimum wage. All of this results in unstable work force and general instability of provider organizations with the possible results in increase abuse and health/safety concerns.	
17	CW Adoptions	Adoptions: Eliminate Post Adoption Services program, impacting supports for over 400 adoptive and guardianship families each year. (IV-B portion of budget)	\$ (77,432)	\$ (57)	\$ (260,351)	\$ (337,840)			DHS's post adoption services program provides services to adoptive and guardianship families who provide permanent homes for DHS children. These services enhance the stability and functioning of adoptive and guardianship families and their children through the provision of a support network that includes information and referral services, consultation services in response to imminent and current adoptive family crises, support groups, and training. In the federal fiscal year ending September, 2011, the post adoption services contractor (ORPARC) provided 1,619 initial and follow up contacts with families, 34 reported crisis or disruption related services, and training to 718 individuals. Families who adopt special needs children must receive adequate and competent support to help sustain their placements. Eliminating the post adoption services program is a potential disincentive for families to adopt special needs children and it will potentially increase the number of children returning to foster care or residential treatment because families in crisis will be unable to receive the support and advocacy they need within their homes. The 1,619 initial and follow up contacts with the post adoption services program will be deferred to branch offices who neither have the staff to respond, nor the expertise and competency to provide the needed services and advocacy for these families.	
18	CW Adoptions	Adoptions: Eliminate Inflation from CSL Package 31 and 32	\$ (1,670,988)	\$ (22,729)	\$ (1,779,282)	\$ (3,472,999)			This eliminates the standard, professional services, and medical inflation taken on the base at CSL packages 31 and 32.	
19	CW Substitute Care	Substitute Care: Eliminate Inflation from CSL Package 31 and 32	\$ (2,736,226)	\$ (307,024)	\$ (2,073,928)	\$ (5,117,178)			This eliminates the standard, professional services, and medical inflation taken on the base at CSL packages 31 and 32.	
20	CW Child Safety	Child Safety: Eliminate Inflation from CSL Package 31 and 32	\$ (473,740)	\$ (113,082)	\$ (1,059,310)	\$ (1,646,132)			This eliminates the standard, professional services, and medical inflation taken on the base at CSL packages 31 and 32.	
21	DD	Eliminate Medical Inflation for all DD Programs	\$ (178,162)	\$ -	\$ (287,009)	\$ (465,171)			Effective 7/1/13 Eliminate COLA for all program areas in the developmental disability community based service system. Since 2001 there has only been one biennium where COLA was applied to services and program costs (07-09) The majority of costs in programs are staff related. There have been significant increases in insurance costs, and other general operating costs. Minimum wage has increased by statute and programs that used to pay well above minimum wage are now paying at or little above minimum wage. All of this results in unstable work force and general instability of provider organizations with the possible results in increase abuse and health/safety concerns.	
22	DD	Eliminate Fairview Housing Trust Fund	\$ (6,000,000)	\$ 6,000,000		\$ -			Effective 7/1/13 Eliminates options to help families and individuals with I/DD remove housing barriers by funding things such as ramps, accessible bathing options, and other housing modifications. Requires a statute change.	
23	CW Child Safety	Child Safety: Reduce ISRS budget by 15%, eliminating in-home supports for approximately 390 abused children each year.	\$ (1,126,580)	\$ (29,048)	\$ (1,656,876)	\$ (2,812,504)			This reduction to contracted ISRS will impact child welfare's ability to: 1) safely keep children at home; 2) return children home in a timely manner; and 3) provide the family supports and services to ensure children aren't re-abused and don't re-enter the foster care system. This reduction is estimated to impact approximately 390 children each year who will now need to enter foster care rather than safely stay at home, or return home, to their parents. This reduction will impact the department's ability to meet Indian Child Welfare Act and other court-ordered requirements. In addition to increased costs in foster care, there will be an increase in costs to courts, defense attorneys, Citizen Review Boards, and others involved in the dependency system. Finally, contractors who provide these services will be impacted and may lay off staff.	
24	CW Child Safety	Child Safety: Reduce ISRS budget by another 15%, eliminating in-home supports for an additional 861 abused/neglected children and their families each year (second reduction to this program).	\$ (1,126,580)	\$ (29,048)	\$ (1,656,876)	\$ (2,812,504)			This second reduction to contracted ISRS will further erode child welfare's ability to: 1) safely keep children at home; 2) return children home in a timely manner; and 3) provide the family supports and services to ensure children aren't re-abused and don't re-enter the foster care system. This reduction is estimated to impact an additional 876 children each year who will now need to enter foster care rather than safely stay at home, or return home, to their parents. This reduction will impact the department's ability to meet Indian Child Welfare Act and other court-ordered requirements. This reduction will also mean more "no reasonable efforts" or "failure to meet active efforts for ICWA children" findings by the courts, which would impact federal funding for Oregon's foster care (out-of-home care) program. In addition to increased costs in foster care, there will be an increase in costs to courts, defense attorneys, Citizen Review Boards, and others involved in the dependency system. Finally, contractors who provide these services will be impacted and may lay off staff.	
25	DD	Eliminate the Family Support Program	\$ (2,062,412)			\$ (2,062,412)			Effective 7/1/13 This program provides small amount of support that goes a long way to helping family with care of child with developmental disability. Approximately 1,000 children and their families will lose service as a result of this program elimination.	

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26	DD	Eliminate the Family to Family Program	\$ (600,000)			\$ (600,000)			Effective 7/1/13 1. Eliminate Family to Family Networks. This program began in 2012 after 2011 made significant reductions in the Family Support Program. The funding (\$600K) supports four networks. The work already accomplished by these groups includes family training, identification of local resources, and general support from one family to another. The networks leverage parent time and local resources in an effort to provide support at no cost to DHS/DD.	
27	SS	TANF - Time Limit 48 Months	\$ (134,978)			\$ (134,978)			This action establishes a 48 month time limit for TANF receipt for the entire family unless a hardship exemption exists. The current Oregon time limit is 60 months and state statute allows for only the adults needs to be removed from TANF once the 60 month limitation has been reached and the family has no hardship exemption. Oregon's policy provides for the children in the home to continue to receive TANF. This action will require each family be reviewed at 48 months of TANF receipt to determine whether a hardship exemption exists. For families where no hardship exists the entire case would close. Some families may see an increase in SNAP benefits as cash benefits end. Ending TANF cash benefits may result in family instability and homelessness. Families would have to rely on other community based safety net programs which have already experienced increased demand. It is not anticipated any families will reach the 48 month time limit in the 2011-13 biennium unless they come from another state and the accrued time (alone or in combination with Oregon accrued time) equals to or exceeds 48 months. This action requires an amendment to ORS 412.079. This reduction would effect an average of 26 cases per month.	10/1/2013
28	SS	ERDC - Reduce caseload cap from 8,500 to an average of 8,000	\$ (5,716,410)			\$ (5,716,410)			Caseload cap is currently 8,500; this would reduce to an average of 8,000. Increase in TANF cases may make it very difficult to get at desired level. This reduction continues the elimination of child care supports for all parents with incomes under 185% of poverty, limiting those supports to only TANF families transitioning to employment. This reduction will further impact the ability of parents to maintain employment, the ability of child care providers to provide care and be employed, and the quality of child care children receive. This reduction will impact family child care providers, child care centers, Early Head Start/Head Start and after-school programs and may increase the number of children left home without an appropriate provider. This would affect 1590 providers. This reduction will reduce the amount of state expenditures that count toward its MOE obligations. ERDC is mainly funded by CCDF federal dollars through an Interagency Agreement with DHS and The Oregon Employment Department (OED). OED has expressed concern about this reduction to DHS.	10/1/2013
29	VR	Reduce Client Service by 10%	\$ (1,664,876)	\$ (232,522)	\$ (6,539,545)	\$ (8,436,943)			The proposed reduction would result in a 21% decrease in case services, forcing the creation of a waitlist. Nearly 5,600 individuals would not get services including youth served under third-party agreements with local school districts. This would jeopardize the match dollars that these agreements provide thus further reducing the program budget. Small specialized vendors who rely on the program for revenue would experience a sharp drop in income. Additionally this will impact the ability of the program to meet the required Maintenance of Effort resulting in a reduction in federal funds available, and resulting in the program reinstating the Order of Selection. OVRs with out an investment above the Current Service level is at risk of reinstating the Order of Selection.	7/1/2013
30	DD	Reduce all Comprehensive Provider Rates by 4%	\$ (13,169,702)	\$ (249,093)	\$ (21,944,108)	\$ (35,362,902)			Effective 10/1/13 Reduce all provider rates by 4%. This would be an across the board reduction of rates for all DD service providers in the comprehensive system, for children and adults.	
31	DD	Reduce Brokerage Administration by 4%	\$ (150,146)	\$ -	\$ (230,468)	\$ (380,614)			Effective 10/1/13 Reduce the administrative budget of Support Service Brokerages by 4%. This reduction in combination with that taken in the 11-13 biennium will total a 10% reduction in the administration budget. There are 13 Support Service Brokerages serving over 7,300 adults with developmental disabilities. Along with general administration, these resources pay for Personal Agent services, and required specialized administrative functions such as fiscal intermediary services that allow for the paying of other direct services (personal support workers, job related services, caregiver respite, etc.) needed by program participants. This reduction is an equivalent of 1.58 FTE.	
32	DD	Reduce Brokerage TCM by 8%	\$ (899,935)	\$ -	\$ (1,474,256)	\$ (2,374,191)			Effective 9/1/2013 This reduction will reduce Targeted Case Management rates for both Community Developmental Disability Programs (CDDP's) Support Service Brokerages by 8%. Targeted Case Managers are responsible for service coordination for over 20,000 children and adults enrolled in the service system for people with developmental disabilities. The case loads of case managers will increase which will compromise the ability of CDDPs and Brokerages to fulfill their case management responsibilities. Case managers will have to prioritize client health and safety concerns over other required responsibilities and could jeopardize Medicaid compliance assurances and this source of federal funding for the service.	

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33	DD	Reduce Comprehensive TCM by 8%	\$ (1,728,884)	\$ -	\$ (2,709,303)	\$ (4,438,187)			Effective 9/1/2013 This reduction will reduce Targeted Case Management rates for both Community Developmental Disability Programs (CDDP's) Support Service Brokerages by 8%. Targeted Case Managers are responsible for service coordination for over 20,000 children and adults enrolled in the service system for people with developmental disabilities. The case loads of case managers will increase which will compromise the ability of CDDPs and Brokerages to fulfill their case management responsibilities. Case managers will have to prioritize client health and safety concerns over other required responsibilities and could jeopardize Medicaid compliance assurances and this source of federal funding for the service.	
34	CW Child Safety	Child Safety: Remove all GF from ISRS, further reducing the program's capacity by 73% and eliminating services to an additional 4,962 children. This removes the remaining GF in the program budget after the two 15% reductions above.	\$ (5,257,372)			\$ (5,257,372)			This third reduction to contracted ISRS will further erode child welfare's ability to: 1) safely keep children at home; 2) return children home in a timely manner; and 3) provide the family supports and services to ensure children aren't re-abused and don't re-enter the foster care system. This reduction is estimated to impact an additional 4,950 children each year who will now need to enter foster care rather than safely stay at home, or return home, to their parents. This reduction will impact the department's ability to meet Indian Child Welfare Act and other court-ordered requirements. In addition to increased costs in foster care, there will be an increase in costs to courts, defense attorneys, Citizen Review Boards, and others involved in the dependency system. Finally, contractors who provide these services will be impacted and may lay off staff.	
35	** CW - Child Safety	Child Safety: Eliminate ISRS. This eliminates the program fully and moves the SSBG federal revenues freed up due to the elimination of FBS to Personal Services in the Field to achieve GF savings.	\$ -	\$ (135,557)	\$ (7,732,088)	\$ (7,867,645)			Elimination of the ISRS program would mean that Oregon's child welfare program no longer has any resources dedicated to in-home supports for parents. This means more children will have to come into foster care (rather than stay with parents to address the issues that brought them to the attention of child welfare) and that fewer children will be able to leave foster care to go home to their parents, because there will be no services to support their safe return home. Oregon's safe and equitable foster care reduction goals will not be achievable with this reduction. This reduction will also mean more "no reasonable efforts" or "failure to meet active efforts for ICWA children" findings by the courts, which would impact federal funding for Oregon's foster care (out-of-home care) program. In addition to increased costs in foster care, there will be an increase in costs to courts, defense attorneys, Citizen Review Boards, and others involved in the dependency system. Finally, contractors who provide these services will be impacted and may lay off staff.	
36	** CW Delivery	Reduce the General Fund for Personal Services in Child Welfare Delivery by \$7.4M replacing it with SSBG given up in ** ISRS line above. (#37)	\$ (7,469,399)		\$ 7,469,399	\$ -			This reduction replaces General Funds with SSBG Federal Funds reduced in line 12 with the elimination of ISRS.	
37	CW Child Safety	Child Safety: Reduce Strengthening, Preserving, & Reunifying Families (SPRF) budget by 10%.	\$ (1,199,764)		\$ (1,780,091)	\$ (2,979,855)			Strengthening, Preserving and Reunifying Families programs provide a broad array of services that are designed to allow children to remain safely with their parents while the issues that are challenging the family are addressed, to keep children and parents connected when children must enter foster care, and to facilitate a quicker return to parental custody. A reduction in these services will impact the Department's ability to implement these programs in additional counties and will result in more children coming into care and staying longer periods of time.	
38	DD	Eliminate all Non Work Individuals from SE54 and applicable SE53 services	\$ (11,704,749)	\$ -	\$ (18,984,158)	\$ (30,688,907)			Effective 10/1/13 This reduction will reduce Alternative to Employment Services (ATE) services and associated transportation services to approximately 1300 adults with developmental disabilities not engaged in paid work or services planned to obtain paid work. The individuals losing services would have no "day services". Currently service for community inclusion or other non-work related supports provide meaningful activities away from a person's home. People who do not have structured activities outside their home could have increased mal-adaptive behaviors and be exited from their residential programs - resulting in possible moves from their community or increased placement in nursing homes, psychiatric hospitals or state operated community programs all at increased costs.	
39	DD	Eliminate all Individuals from SE54 and applicable SE53 services	\$ (16,917,713)	\$ -	\$ (27,853,683)	\$ (44,771,396)			Effective 10/1/13 This reduction is offset by an allowance to the residential providers of \$100/day per number of days the individuals was authorized to Non Work or Work and includes additional reductions for the transportation provided to take these clients to their 54 providers.	
40	APD	Reduce Assisted Living Facility rates to \$1,950	\$ (4,411,361)	\$ -	\$ (9,587,959)	\$ (13,999,320)	-	-	For the most part, providers serving individuals in the Department's Aging and People with Disability programs have not had a COLA since July 2008. At the completion of this biennium, the total period without increases will be five years. Decreasing rates paid to Assisted Living Facilities may threaten Medicaid access as the private pay market improves.	10/1/2013
41	CW Child Safety	Child Safety: Further Reduce Strengthening, Preserving, & Reunifying Families (SPRF) up to 30% of the budget.	\$ (2,399,527)		\$ (3,560,182)	\$ (5,959,709)			Strengthening, Preserving and Reunifying Families programs provide a broad array of services that are designed to allow children to remain safely with their parents while the issues that are challenging the family are addressed, to keep children and parents connected when children must enter foster care, and to facilitate a quicker return to parental custody. A reduction in these services will impact the Department's ability to implement these programs in additional counties and will result in more children coming into care and staying longer periods of time.	

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42	CW Child Safety	Child Safety: Further Reduce Strengthening, Preserving, & Reunifying Families (SPRF) up to 50% of the budget.	\$ (2,399,527)		\$ (3,560,182)	\$ (5,959,709)			Strengthening, Preserving and Reunifying Families programs provide a broad array of services that are designed to allow children to remain safely with their parents while the issues that are challenging the family are addressed, to keep children and parents connected when children must enter foster care, and to facilitate a quicker return to parental custody. A reduction in these services will impact the Department's ability to implement these programs in additional counties and will result in more children coming into care and staying longer periods of time.	
43	DD	Eliminate Long Term In Home Supports for Kids SE151	\$ (1,142,861)	\$ -	\$ (1,903,270)	\$ (3,046,131)			Effective 10/1/12. This reduction will eliminate the service of long term in-home supports for children with developmental disabilities. This program serves approximately 152 children and their families by providing in their home supports such as in-home staffing by personal support workers, behavior consultation, respite for family caregivers, etc. The purpose is to provide services to insure the child can stay in their family home and avoid more costly out of home services or return the child to their family home from an out of home service placement. Because these children must be in a crisis status to get these in-home services, it is expected that without these services the children will require out of home services on a long term basis.	
44	DD	Eliminate Long Term In Home Supports for CUIS SE145	\$ (8,064,747)	\$ (5,867)	\$ (12,481,126)	\$ (20,551,740)	(22)	(22.00)	Effective 10/1/13 Elimination of the three Model Waivers that support children with medical and behavioral needs who live at home. This reduction will eliminate services to 356 children and their families. These waivers are used as an alternative to children living in hospitals, nursing homes or foster care. It is assumed that 80% of these children would move to one of the three settings mentioned above if in home staff and nursing were not available because of this funding elimination.	
45	Agency Wide	Forego Other Funds used for local match and/or Reduce DHS programs		\$ (95,832,114)		\$ (95,832,114)			DHS is statutorily required to provide reduction options totaling 10% of CSL for each fund type. This reduction would be accomplished through a series of action including eliminating local match of federal funds and reductions to programs across DHS that are funded by Other Funds. This is not specific as it will depend on which Other Fund funding sources would be reduced as to the exact reduction. Loss of local match would reduce local provider programs who have expenditures that are legally matched with federal funds. This assumes there is no General Fund backfill available.	
46	Agency Wide	Forego Federal Funds and Reduce DHS programs			\$ (274,149,101)	\$ (274,149,101)			DHS is statutorily required to provide reduction options totaling 10% of CSL for each fund type. This reduction would be accomplished through a series of program reductions depending on which federal funding sources are being reduced. This is a real possibility based on the current federal sequestration rules. However, this action is not specific as it will depend on which Federal funding sources would be reduced as to the program needing reduction. This reduction assumes there is no general fund backfill for these reductions.	

TOTAL REDUCTIONS	(256,753,652)	(41,864,798)	(360,775,036)	(659,393,487)	(80)	(78.20)
Reduction % from CSL target	-10.03%	-10.00%	-10.00%	-10.01%		
diff	(256,041,636)	(41,864,799)	(360,775,036)	(658,681,471)		
	712,016	(0)	0	712,016		