

FISCAL YEAR 2009-10 NEEDS-BASED PLAN AND BUDGET GUIDELINE COMMENTS

SUBJECT	DPW CONSIDERATION AND REVIEW/RESPONSE
General Questions	
Do required organizational charts count towards the 10-page limit?	No. They are not counted towards the limit. The page limit applies only to the narrative portion.
The Needs-Based Plan and Budget (NBPB) Bulletin is silent as to the recommendations of the Philadelphia Expert Panel. If the county is still targeting expedited response times, will that be supported by the Department?	If a county has identified an increased response time protocol for specific populations (age, type of referral, etc.), the county can highlight it in the County Specific Circumstances part of the narrative and details in Adjustments to Expenditure narratives, as warranted. All adjustments will be reviewed to determine the level of funding approval.
Each year, there are issues regarding cost center definitions. Counties need uniformity and clear definitions of what goes into each cost center.	Agreed.
Under what circumstances will Aftercare be supported?	It can be looked at as part of State Reintegration or Older Adolescent Initiative and could also be part of the Pennsylvania Promising Practices (PPP).
How should counties proceed with a re-entry possible for youth over age 18?	The only way youth over age 18 can re-enter is to change the law. Potentially, OCYF may need to look at this from a "discharge" verses "trial separation" from placement.
Data Packages	
Is there any way to pull re-entry removing the eight (8) day children?	The data will be made available to counties in the coming weeks; HZA is completing the data supplements pertaining to placement rates and case-level data for all 15 CFSR measures.
Is the data case specific and will a child show up as re-entering?	The data within the packages is aggregate and does not track one child longitudinally. The Adoption and Foster Care Analysis and Reporting System (AFCARS) data tracks individual children and will show re-entries for each child within each period.
If a county is looking at reviewing Shared Case Management (SCM) and having more children with SCM, how will that affect data information?	Information on how to track SCM youth in AFCARS will be included in the Shared Case Responsibility bulletin that is being drafted by OCYF. The impact on the counties' AFCARS data will depend on how they are currently using SCM and how it is currently being reported in AFCARS. The impact that changes in a county's shared case population may have on the permanency outcomes, either positive or negative, will depend on circumstances of the individual cases that are a part of the measures. The reunification, placement stability and re-entry measures are the ones that may be the most affected by changes in the shared case population.

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Policy Changes - Page 12	
When will the Safety Bulletin be completed?	Soon. OCYF is sensitive to increased financial needs on counties with policy changes but we all need to be conscientious in review of presenting how much money is needed.
Funding Issues - Page 16	
On Quality Assurance for Title IV-E, does the county need to address SCM in this section?	Yes, anything regarding Title IV-E should be addressed. The draft SCM bulletin will be sent out within 30 days for review and comment and is not expected to result in more kids.
If the Title IV-E amounts in submissions are not accepted and changed by OCYF, does the county need to submit a new Assurance of Compliance?	The county will only need to resubmit the Assurance of Compliance if the local amount increases.
Child and Family Service Review - Page 16	
Does the county need to address all of the Child and Family Service Review (CFSR) outcomes?	Counties must address Re-entry, Reunification and Timelines to Adoption. If a county does poorly in any other outcome, it must be addressed. If a county does exceptionally well in any other outcome, the county may want to address this as well. Particularly if the county plans for either Evidence-Based Practice (EBP)/PPP/or additional Act 148 funds are tied to the continuation of this success.
Pennsylvania Promising Practices - Page 18	
If a county is considering identifying a current program as a PPP and moves out of the budget to be funded differently, what will the state/county match be?	The reimbursement will be determined in the FY 2009-10 budget negotiations. It will not be more than a 80/20 state/county match as if in NBB, but the goal would be to be able to fund it at a higher reimbursement rate.
Can county identified PPPs be a new service?	The county defines what they want to be funded as a PPP. It can be something already in the NBB or it can be new. If a PPP serves both dependent and delinquent, the county can still have one additional program (two per county). The program must be outcome-based and have clearly defined measures to collect data. The program must also be tied to a reduction of out of home care. The goal is to have 134 PPPs by August 1, 2008.
Do we need to do an adjustment to remove monies associated with PPP or do we just identify it in the Needs-Based Budget (NBB) Plan submission?	For FY 2009-10, if there is a PPP that you wish to be considered for funding by special grant, the county needs to address both in narrative and in an adjustment. If the request for grant funding is denied, the adjustment will be denied and the monies will remain in the NBB.

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<p>Is there a possibility that Special Grant funding will run out? If so, how do we get the money back into the NBB?</p>	<p>OCYF cannot comment on the likelihood of future funding, but services identified to be funded through the special grants, Evidence-Based Practice (EBP) or PPP, are Act 148 reimbursable services and the process to pick funding back up through NBB would be done as grant pick ups.</p>
<p>Can one of the PPPs be an outcome-based program but not a blue print program?</p>	<p>Blue print programs will have their own grant funding, 95/5 state/local match (Multi-Systemic Therapy (MST), Family Functional Therapy (FFT), Family Group Decision Making (FGDM), Multidimensional Treatment Foster Care (MDTFC), Family Funding and Family Development Credentialing). PPPs are for the other types of programs that counties may have developed with good outcomes that they want to propose for special funding consideration in FY 2009-10.</p>
<p>Our county has been working with OCYF and a University regarding George Junior Preventative Aftercare to identify their program as an EBP. Would this automatically be rolled into a special grant or do we need to identify it as one of the PPPs? Would we be able to choose two practices in addition to this one?</p>	<p>At this time, per the NBPB Bulletin, it is not one of the EBPs for FY 2009-10, so the county would need to request it for consideration as a PPP. Counties are limited to two practices, one for dependent youth and one for delinquent youth.</p>
<p>PPPs - Do the programs need to be "Promising Practices" as nationally noted/labeled as such or can they be a county originated or selected practice?</p>	<p>Our effort to create our PPPs is for the county to choose programs they believe to be a Promising Practice. The county must identify what it is, how it is delivered, to whom it is deliver and the outcomes.</p>
<p>If a program fails, does the money have to be given back?</p>	<p>Absolutely not, there are trials and errors expected. What works in one county does not work in all counties. This also gives the provider incentive to provide services.</p>

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EBP versus PPP, what is the difference?	<p>EBP is published and researched. EBP currently includes FFT, Nurse Family Partnership (NFP), MDTFC and MST and in Pennsylvania, we have added FGDM. In FY 2009-10 we are also adding Family Finding and Family Development Credentialing. NFP is only funded through the Office of Child Development and Early Learning.</p> <p>PPP is not University-Based and is not tested. PPP should be outcome-based and county-specific. There are two PPPs per county, one dependent program and one delinquent program. Counties need a concrete description; i.e., what are the services, how are they delivered, expected outcomes. The program must have clearly defined measures to collect data and must also be tied to a reduction of out-of-home care.</p>
The NBPB Bulletin states that the county "may" submit two programs to be considered for PPPs. We can either submit or not. If there is no submission, are there consequences?	The county does not have to submit. No requirements, just no special funding.
The NBPB Bulletin refers to a need for a corresponding drop in placement days. What if it is a prevention error?	<p>If keeping kids and families out of the system completely, then it is appropriate as the practice is meeting the intent which is to decrease our dependence on placement.</p> <p><u>Acceptable</u>: A human service program at school in a county to drop the number of referrals to the agency. In 2002, the school generated 100 referrals and 50 kids were placed (each year data). The county implements the service with a projected expectation of numbers to go down.</p> <p><u>Unacceptable</u>: Same scenario as above but in a school setting where there is no historical data. Why implementing the service?</p>
Can the research/outcome be a penetration rate to the adult system, target re-arrests, etc.?	Goals and outcomes should be simple for year one. The county can project to see outcomes in FY 2010-11. The outcomes do not need to be in FY 2009-10 as that may be too soon to see outcomes. The scenario presented may be too complex to tackle in the first year.
Juvenile Justice Programs geared towards Competency Development to increase educational needs, etc., can these be outcomes for PPPs?	Yes, the county defines their outcomes for PPPs.

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Evidence-Based Practices - Page 18, 23	
How can counties get increased funding for EBP in FY 2008-09?	The county must submit a letter to Mr. Richard J. Gold, Deputy Secretary for Children, Youth and Families, requesting consideration for additional funding for FY 2008-09 or to be considered for grant funding in FY 2008-09 (if you did not have any identified). Like the mid/end of the year, reconciliation of Statewide Adoption Network SWAN funds or end of fiscal year Act 148 funds, there may be opportunity for funding if other counties do not expend their grant funds but the only way to know the county is interested in additional funds would be through a letter.
How do counties request additional funding for Family Group Decision Making (FGDM) in FY 2009-10? How do counties invoice for funds approved in FY 2008-09?	No EBP funds for FY 2009-10 should be requested through NBPB. Additional instructions will be forthcoming on invoicing procedures for FY 2008-09 Special Grants.
Can counties get more information on Family Development Credentialing and Family Funding? Will resources be provided so counties can review what their needs may be?	Both services are part of the AOPC Roundtable discussions and part of the initiative to be discussed.
If a county intends to become one of the selected counties for the AOPC initiative, should this be addressed in the NBPB?	The county should reference this in the budget planning summary. If the county is going to also request funds for any of the initiatives outside the AOPC, the county should not do that through the NBPB, but separately.
George Junior may become an FFT site.	FFT is an EBP that should be funded for FY 2009-10 through the grant process. Other types of programs may be considered for FY 2009-10 as a PPP.
EBP monies not taken out as a special grant for FY 2008-09, how do the counties get it in FY 2009-10?	For FY 2009-10, it should be designated. Do an adjustment for FY 2009-10 removing it and ask for it as an EBP.
When will counties have the process for requesting EBP in FY 2009-10? The NBPB Bulletin states instructions to follow under separate correspondence.	No separate instructions are forthcoming for requesting EBP in FY 2009-10. The request needs to be put in the NBB narrative. How much money is being request, who is receiving the service, who is providing the service, what is the service, etc. An adjustment will need to be done to remove the funding from the NBB expenditures for FY 2009-10, as you are requesting it to be funded outside the NBB (if a county did not have special funding in FY 2008-09 and have FY 2008-09 expenditures). If the county had EBP monies in FY 2007-08, an adjustment to reduce or eliminate those monies needs to be done for the implementation year.

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Continued funding: (1) How do the counties get additional money? and (2) How do the counties get it back into the NBB if special funding is no longer needed?	The Legislature sees the total OCYF monies, not just the NBB. The funding is in OCYF's total budget and is never removed. Special grants have never been decreased.
Can this funding (special grant) be used for start up costs and the gap time between referrals and approvals?	Special grants: (1) can be used for start up costs and includes gap time for referral and Medical Assistance (MA) pick up; (2) can include non-MA eligible kids and kids who were determined to not meet medical necessity; and (3) include kids who have no diagnosis but could fit the service. The county needs to keep a central record for audit purposes (EVS or youth summary, etc.).
Multi-Systematic Therapy (MST) - If the county has a grant for FY 2008-09 and still want to use the grant in in FY 2009-10, does the county still need to show it in the NBB since it will be a special grant need? If so, where?	Yes, put it in the NBB Planning Summary Narrative. Describe service levels in the NBB for both FY 2008-09 and FY 2009-2010 and the funding levels for each year.
If the county has special grant funding for EBP in FY 2008-09 but during the year the county spends more than the funding, can the county use NBB Act 148 funds?	Yes, with the regular NBB reimbursement rate and/or at the end of the year if there are special grant funds remaining, they can be made available at that reimbursement rate.
If MST is through a Pennsylvania Commission on Crime and Delinquency (PCCD) Grant versus an EBP Grant, what does the county need to do to get the MST into the special grant funding?	The county should spend PCCD monies first and look to MA or OCYF for funding once grant dollars end.
Can a PCCD Grant with limitations also be supplemented with EBP funding?	Yes.
Can start up costs be funded?	Yes. One to two years can be program funded.
If a special grant was approved for MST, does the county have to expend it on MST or can the county use it as FGDM or another EBP during the year if circumstances change in the county and the county cannot expend as planned?	Submit a request for consideration to Mr. Richard J. Gold, Deputy Secretary for Children, Youth and Families. The request should list the reasons why and be approved/signed by by the County Commissioners, JPO, Judge, OCYF and the Office of Mental Health and Substance Abuse Services (OMHSAS). For FY 2009-10 it can be used in the NBB.
If an increased EBP request is not approved, will the Department put an adjustment in to create monies for the NBB?	Yes.

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If a county wants to use MST/FFT and a Managed Care Organization (MCO) is not willing to enroll a new provider, what should be done?.	(1) The Community Care Behavioral Health (CCBH) capacity rate did not include these services, so OCYF will fund as not part of the MCO organization. CCBH 27 should use OCYF funding. OMHSAS is negotiating the 2009 capacity rate and services will be included. (2) MST/FFT are not a CCBH group but the MCO states they cannot find a proficer to come on board. If this is the case, notify Mr. Richard J. Gold, Deputy Secretary for Children, Youth and Families as the MCO contract requires them to find providers.
How should a county document CCBH has no service/new enrollment and the use of Act 148 funds?	A letter from the MCO regarding the provider not being in the MCO plan.
What if not part of MCO, how does the county obtain funding?	The county needs to work to make sure that when the cap rate is negotiated, the county's needed services are included. Negotiations should be completed at the local level.
What counties are using Multidimensional Treatment Foster Care (MDTFC) and who are their service providers?	Blair County/Cumberland County - NHS Lehigh County/Northampton County - Children's Home of Reading Venango County - County is providing directly. Erie County - Harborcreek York County - Children's Home of York
MDTFC certification can take up to 18 months.	Start up costs are funded.
If county staff provide FGDM or MDTFC services, can they be grant funded or is it limited to purchased services?	In FY 2008-09, it was limited to purchased services.
State Reintegration Program - Page 19	
Please clarify the amount to use per child for State Reintegration Program (SRP) costs in a budget adjustment.	It is a 80/20 funding split in the counseling delinquent cost center at \$20.36 daily with a 6-month average length of program.

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Document Maintenance for Residential Providers - Page 19	
Why is the process of providers maintaining child-specific data in a central spot part of the county/provider contract included in the NBPB? Will data reports be provided to counties, how frequently? If the contract has already been sent out, will the county need to complete an addendum to include this information?	The county holds the contract with the providers. The information being requested feeds into the goals set for and by the providers. The information will help the county identify program effectiveness and identify where the county wants to place their youth. The bulletin is silent as to how the information compiled will be disseminated. The county should consider what would be beneficial to the county and make that part of the contractual requirements. If the contract has already been sent, there will have to be a contract amendment/addendum, effective July 1, 2008.
For a provider to accept a referral, can the youth be put on a waiting list?	For a provider to note an acceptance of a referral, the child must be admitted into the residential facility no later than two (2) weeks from the notice of acceptance.
Please clarify who needs to track each child referral for service. The county or the provider?	The provider must track.
The county has concerns that kids are on "waiting lists" due to a no-eject/no-reject mandate. The list gets longer and longer so that providers can achieve a 100 percent acceptance rate.	Nothing in the NBPB speaks to no-eject/no-reject. The NBPB is working to clarify that stats are acceptable.
The NBPB Bulletin lists contract language. Are counties supposed to include this language into their contracts with providers?	Yes.
Older Adolescent Initiative/Independent Living Initiative - Page 19	
Is it OCYF's expectation to keep youth after high school? In college?	Absolutely. Transition age outcomes are very important. Counties will be evaluated on meeting these goals.
Can the county keep a child that is over age 18, graduated and not continuing their education but is not ready to be on their own?	Ask your region. If issues exist, they can be discussed.
Goals for County Agencies - Page 20	
Do the goals for county agencies include child and youth (C&Y) and juvenile probation office (JPO) youth?	Yes.
Is it all JPO youth or only those being served through Act 148 funds?	All JPO youth. These goals are a measure of the county's services as well as the services the county purchases for youth.
Are counties tracking AFCARS eligible kids or all youth in regards to tracking new adjudications/re-offenders?	All youth.

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For the goal related to re-abuse upon discharge from placement, is the county only tracking if a child who was victim of child abuse was placed and re-abused upon returning home? Is the county also tracking if a child was abused upon return home whose reason for placement was not prior abuse? If the county is only looking at children who were subjects of abuse prior to entering care, part of the population may be missing.	Counties should be tracking all children and youth. Any child discharged on or after July 1, 2008 (regardless of the reason why they were in care) must be tracked/recorded regarding any new report of child abuse at six- and 12-month intervals after discharge.
The JCMS Program puts out outcomes. Can it be attached to the NBPB as part of the county's outcomes?	The county can choose to but the county needs to discuss what they mean for the county and not just give numbers. It will count towards the ten-page limit.
Goals for Residential Providers - Page 21	
Regarding the provider outcomes that begin July 1, 2008, there is concern that the providers will not be able to track a child or provide information that is required. What conversation/discussion occurred with providers about this requirement? Why not suggest that providers begin to track this information instead of forcing it on them?	Goals for providers has been an ongoing process since last year's NBPB process, so this requirement is not new. The goals have been refined.
Do the residential goals also apply to Youth Development Centers/Youth Forestry Camps (YDCs/YFCs)?	YDCs/YFCs must accept a court referral. Admissions/discharges are determined by court orders, not the Department of Public Welfare. Furthermore, OCYF maintains a record of all arrests and restraints for youth in the YDCs/YFCs.
Do goals for residential providers need to be addressed in the NBPB or is this a contract issue?	This is a mandatory contract issue that does not need to be addressed in the NBPB.
If the county has a child in placement and regulations state that the child needs to be seen by a physician/dentist and insurance will not cover because the child was recently seen, should the county be paying the bill?	Please see Policy Clarification 3700-07-03, dated May 25, 2007, that addresses this issue. The policy clarification will be reissued.
Schedule of Existing Purchased Services - Page 21	
On page 21 of the NBPB Bulletin it asks counties to identify the four (4) largest purchased providers: two (2) in-home, one (1) community-based and one (1) institutional. By the term "largest," is the county to assume in terms of dollars expended and not the number of kids served? And by "schedule of existing purchased services," does that include Agency provided services (like agency provided foster care) or only actual purchased via contract service providers?	The largest provider does refer to providers in terms of dollars expended. Existing purchased services refers to contracted purchased services.

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Medical Assistance Services - Page 22	
A physician does a forensic evaluation which includes an extensive medical exam and interview for a county. Can it be funded through OCYF?	Yes, through Child Protective Services Forensic Evaluation.
If a child has private insurance deductible and the family has medical needs and claims financial hardship, what can the county do? Example: referral of a child to a therapist who bills private insurance which required the deductible to be paid first and the family states they cannot afford the deductible and ask the county for assistance.	Ask the family to seek a waiver from the insurance company to waive the deductible. If the insurance company refuses and the agency can obtain a copy of the denial from the insurance company, OCYF can fund.
What should a county do if they have a family that needs counseling (parents) and the family has an outstanding debt for non-payment of co-payments and the provider refuses to see them?	Pay the co-payment. It is cheaper than potential placement.
Independent Living Grant - Page 22, Appendix 10	
What will the minimum age be for requesting Independent Living (IL) funding? Chafee guidelines are age 16, but other discussions identify age 14. For IL funds in addition to Chafee, what is the minimum age limit?	For proposed special grants, the minimum age limit is 14.
How does the county account for case management for youth who are in IL placements that are not providing IL services but are the youth's caseworker?	Staff salaries and benefits for caseworkers for youth who receive IL services will be invoiced in the cost center in which placement costs are invoiced.
No expenditures must remain in Supervised Independent Living (SIL) cost centers but instructions say room and board costs are not part of IL. Where should the county put these costs if not in the SIL cost centers?	In the Community-Based Residential cost centers.
Are the IL forms that are part of the Excel Workbook new?	These are the forms for the IL Grant. The counties' NBPB requests for IL services will be in addition to the counties requests for Chafee IL funds.
Counties with IL grants have just detailed their information for FY 2008-09. Can the county use this information and identify it in the NBPB for FY 2009-10? Chafee monies have been the same or decreasing for 17 years. Can the county detail what they want in addition to the NBPB?	The NBPB has been one way to supplement the program with the decreasing Chafee grant or other needs. The county does not have to redo information for prior years. For FY 2007-08, DPW will be giving back Chafee monies. It is very discouraging when there are so many unmet needs for youth.
The NBPB Bulletin says IL money for FY 2009-10 is to be requested through the NBPB process (Appendix 10).	Counties should look at the difference in base versus special grants. OCYF is asking counties to identify IL services (not placement costs) distinctly. Few counties requested additional money in FY 2008-09. the base will be mandated services and county staff and then special grants may be given.

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Should IL also include delinquent youth, Shared Case Management Only or others as well?	IL is applicable to all delinquent youth.
If a county had IL staff as part of the existing NBPB base, should staff come out of the 850 form and an adjustment be done to remove salary and benefit cost from the budget?	Counties are advised to remove staff from the NBPB base and the staff form.
If a county wants to finance first and last months rent, heating costs, etc., does the county put in this section of the NBPB? This was asked in relation to IL as well as the Housing Initiative.	It might be funded in a special grant. Also, for families counties are working with the ability to provide good in home services with partnerships with local housing authorities may eliminate the need for placements of children. Anything that is not a mandated service may be picked up in special grants.
Regarding IL/Housing, can counties provide services to youth under supervision with JPOs who are not delinquent in a special grant?	Yes.
Chafee Foster Care Independence Program (CFCIP) eligibility - All forms K through L for IL do not include space for youth who are excluded from CFCIP eligibility. How do counties account for the expenses to serve these children?	Beginning on page 98 are the service areas A through K. Counties are to input the forms with estimates to be served and some narrative information. They also input fiscal information (amounts/services). Counties can include the non-CFCIP eligible count and population in the narrative portion of each service area.
Information Technology Grant - Page 22	
When will counties receive their Information Technology (IT) allocations?	The funding is a 60/40 split but OCYF is working on drawing down Title IV-E Administration and still working on allocations. Counties should see allocations within two (2) weeks.
If the IT allocation is not funded at the level requested, can counties appeal?	Yes.
Nurse Family Partnership - Page 22	
The county needs clarification regarding the Nurse Family Partnership (NFP).	The county must provide information to OCYF on the status of the provider obtaining a 10 percent local match. If the county is willing to fund this local match, they can do so but not through the NBPB. When OCDEL received funding from OCYF's budget, their contracts are with providers at 90 percent funding and the provider has to produce the local match.

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Assessment Tool - Page 23	
What is the Assessment Tool?	OCYF, OMHSAS and the Juvenile Judges' Commission work with a list of screening tools that would work for all three (3) systems. Counties can decide if they want to use a specific tool in their county. Countywide costs are to be addressed in a narrative. The state bears the costs of training.
Trend Data Worksheets	
Regarding the Adoption Assistance and Placement Data Chart, if a child leaves care and comes back within a year do you only count them once?	Yes, page 11 of the NBPB Bulletin clearly states to count children one time per cost center but you can count the same child in multiple cost centers. The total days in care (regardless if one placement or multiple placement episodes) will be counted.
The following pertains to the "Trend Data" worksheets: (1) when printing from the NBPB, we encountered an error that almost caused us the inability to print; (2) one of the lines sets the "print quality" to 300 in the code (actually it is on two lines), the program would crash on these lines and prevent printing; (3) it is not generally necessary to set a value for print quality as most printer's defaults will handle this. By removing the two lines we were able to continue printing. You may want to remove these lines for future distributions of the file(s).	When OCYF conducted test prints using print macros on the "trend data" worksheet, no errors occurred.
Legal Representation Costs for Juveniles in Delinquent Proceeding (LRCJDP) Worksheet	
On the LRCJDP Worksheet the column "Cost Category" is defined as "list the appropriate cost." I'm not sure what that means; could you please give an example?	Cost Category should be defined as "list the appropriate cost center." The last word was omitted I the bulletin.
Many counties have questions about the FY 2008-09 and FY 2009-10 legal costs form and process to fund public defender costs to represent delinquent. (1) What legal costs can be paid by county C&Y/JPO? (2) What type of audit trail or approval for expenses is needed especially if the employee part of the public defender staff? (3) Is a Memorandum of Understanding needed, what would it cover, and who should prepare and sign the document? (4) Are there prohibited costs that C&Y/JPO cannot pay?	(1) Public Defender costs are only for legal representation of youth in dependency and delinquency court and parents in dependency court. (2) The same as for any unit in a larger organization. (3) If the service is for court and a contract is in place with C&Y, then an intergovernmental MOU is required. The county prepares and determines the signers. (4) The question is not worded in a way that it can be understood.
Can counties pay for legal representation for parents?	Yes, the bulletin from 1983 is being rescinded. Legal fees will be reimbursable costs.

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<p>How should counties classify Legal Services Costs for Delinquent Youth if the county has never previously funded it?</p>	<p>Classify as a "U" for Utilization Increase.</p>
<p>State Transition Grant (STG) Error</p>	
<p>In the "VERY IMPORTANT - FY 2009-2010 NBPB Program Change" email of June 13, 2008 regarding the revenue adjustment for STG funds, this is what is occurring in the program:</p> <p>Adjustments were made in program income to remove the same amount each of the three years. In year one, the STG income is the only income we received; however, because our costs are increasing each of the next two (2) years, the STG adjustment is not removing the entire amount of program income. This seems to be an error, as we receive no other program income in this cost code, the balance should be \$0. the email says to take the same amount our each year, but shouldn't I be able to make different adjustments each year to bring the balance in the Counseling/Delinquent cost code to \$0?</p>	<p>Agreed. Counties will need to modify their adjustments in Implementation Year and Needs-Based year to bring the balance to \$0.</p>