

Protocol for Requesting Risk Pool Funding

State Fiscal Year 2019-2020

This Protocol for Requesting Risk Pool Funding for state fiscal year 2019-2020 outlines the process by which Community-Based Care Lead Agencies may apply for potential funding from the Risk Pool appropriation provided in the General Appropriations Act.

The establishment of a statewide risk pool program, administered by the Department, serves to manage and share the financial risks associated with the Community-Based Care (CBC) model for child welfare services in Florida. Should factors outside of a Lead Agency's control (e.g., shifts in the number of children in care, increase in the number of very difficult populations, or a change in the characteristics of the children and families served) cause costs to rise, potentially impeding the Lead Agency's ability to provide ongoing quality services for all children and families served, section 409.990(7), F.S., (Exhibit A) provides qualified Lead Agencies with access to petition for relief from the risk pool in an effort to avoid lead agency failure.

Section 1: Eligibility criteria

Proviso language contained in Specific Appropriation 326 of the General Appropriations Act for state fiscal year 2019-2020 requires the Department to conduct a comprehensive, multi-year review of the revenues, expenditures, and financial position of all CBCs for the most recent two consecutive fiscal years (SFY 2017-2018 and 2018-2019).

To simplify the risk pool process and minimize duplication in requests for data and information, the risk pool protocol will rely significantly on the extensive data used to develop financial viability plans and to support the ongoing monitoring of all CBCs for financial stability and programmatic performance.

A CBC is eligible to apply for risk pool funds in state fiscal year 2019-2020 if they meet the following criteria:

- The CBC projects an end of fiscal year deficit, inclusive of any carry forward deficit.
- The CBC will submit a SFY 2019-2020 Plan to Achieve Financial Viability to the Department's Office of CBC/ME Financial Accountability.
- The CBC has implemented its SFY 2018-2019 Financial Viability Plan with a high degree of fidelity.

Section 2: Application submission process

In addition to the CBC's Financial Viability Plan, a CBC seeking risk pool funds must submit to the Department by **September 13, 2019**, the "Risk Pool Funding Application SFY 2019-2020."

Applications will be reviewed and prioritized in two phases. Phase I is intended for CBCs that are projecting a current year core deficit in excess of their expected available funds. Phase II, subject to funding availability, may provide an additional opportunity in Q3 to make a case to be considered for risk pool funding.

Applications will be reviewed with all available cost/expenditure data and all other supporting documentation, including the CBC's Financial Viability Plan. Department personnel, upon request, may review additional records related to this Application for potential funding resolutions.

- 1.1 The CBC should consult with their Regional Managing Director (RMD) regarding their Risk Pool Funding Application and forward their application to the Office of CBC/ME Financial Accountability (OFA), and cc: their contract manager and RMD. **This step shall be accomplished no later than September 13, 2019.**
- 1.2 If the CBC and RMD cannot reach agreement on their application, they may call Patricia Medlock, Assistant Secretary for Child Welfare.
- 1.3 The review of all Risk Pool Funding Applications will be governed by a peer review process led by the Assistant Secretary for Child Welfare and subject to the approval of the Secretary of the Department of Children and Families. The Peer Review Committee will be selected and facilitated by the Assistant Secretary for Child Welfare and will include, but not be limited to, the following members (or their designees):
 - (a) Two (2) Executive Directors (ED) or Chief Executive Officers (CEO) from non-applicant Lead Agencies; and
 - (b) One (1) Chief Financial Officer from a non-applicant Lead Agency.
- 1.4 The Peer Review Committee will:
 - (a) Review, analyze, and discuss the application.
 - (b) Verify the accuracy of the data being reported by the Lead Agency.
 - (c) Conduct an on-site, fact-finding visit as deemed necessary to confirm input and analysis from the applying Lead Agency (visits to sites are not required if visited in the last 24 months - final determination to be made by the Secretary and Deputy Secretary).
 - (d) Assess need for immediate technical assistance regarding budget development/management, and determine if continued on-site technical assistance is appropriate. In these cases, the Peer Review Committee will serve as the coordinating entity for the provision of technical assistance.

- (e) Make a final recommendation to the Secretary upon the completion of all required site visits, regarding approval or disapproval of the application. Recommendations for approval will include:
- i. Amount of funding and mix of funds to be made available.
 - ii. Limitations or requirements on use of additional funding that are linked to correction of factors that caused the shortfall.
 - iii. Any follow-up actions or additional documentation needed from the Lead Agency or Region.
 - iv. Rating for both Family Support Services and Safety Management Services.
 - v. Report on technical assistance activities completed and remaining, and/or recommendations for future technical assistance.
 - vi. Access to the risk pool.

1.5 If at the end of the year, a Lead Agency that received assistance from the Risk Pool concludes with a surplus, the Department reserves the right to require the Lead Agency to refund the Department the relative portion of the surplus that was accumulated as a result of the awarded risk pool funds.

Risk Pool Funding Application SFY 2019-2020

Please complete all items, sign and date the application, consult with your Regional Managing Director, and submit electronically to the Office of CBC/ME Financial Accountability (OFA).

Lead Agency Name: FamiliesFirst Network of Lakeview Center, Inc.

Region: [Click here to enter text.](#)

Contract No.: AJ495

Address: 1221 W Lakeview Avenue, Pensacola, FL 32501

Lead Agency Contact: Mark Jones

Phone No.: (850) 453-7745

Contract Manager: Lisa Carden

Phone No.: (850) 483-6676

This request is being submitted in response to a projected deficit at 6/30/2020 inclusive of all currently available funding.

Financials:

- 1) State the amount of funding requested from Risk Pool funds and the amount of the projected deficit at the end of Fiscal Year 2019-2020:
Projected Deficit: **\$950,000**
Amount of Risk Pool Funds Requested: **\$950,000**
- 2) Confirm that the amount of funding requested would be fully expended during Fiscal Year 2019-2020: Yes No
- 3) State specifically how the Lead Agency would qualify for Risk Pool funds based upon the requirements in s. 409.990(7), F.S. (Appendix A):
Removal rates for children entering into care in Fiscal Year 18-19 showed a slight decrease of removals of 836 children from the previous year count of 965 children removed. However, one of the four counties, namely Escambia County, showed an increase in removals leading to a 50 percent increase in out of home care in Escambia County rising from 500 children to 750 children. In addition to the increase in Escambia County, FFN also saw a significant increase in children served in-home from the previous fiscal year. In FY18-19 we served 858 children compared to 687 from the previous fiscal year which also contributed to the need to hire additional case managers as noted in question 5. Please refer to attached charts.
- 4) How do you propose to use these funds to address or correct the underlying cause of the shortfall?

FFN has implemented a process to identify gaps in prevention and diversion services throughout the four county areas. FFN Leadership is working with each county to determine utilization of services on both the prevention side as well as post re-unification services. There is an opportunity to enhance prevention/diversion services in at least two of the counties namely Okaloosa and Walton County. The needed services will provide 24 hour response access to families in crisis and will provide both concrete and safety services. The services in the two county areas will assist in reducing removals into foster care and lead to reduction in overall out of home care.

FFN has also launched a major faith based foster home recruitment initiative. This initiative will commence in Escambia County in September 2019 and will branch out to the other three counties over the next six months. The purpose of this project called Fostering through Faith Coalition is to recruit and support foster parents in order to build capacity. FFN intends to begin to step children out of group care once capacity has increased and will focus on children aged twelve and under. This capacity will allow us to reduce group care costs by at least 25% or \$1,000,000.

- 5) Please attach a narrative explaining how the deficit occurred, what steps have been taken to address the cause(s), and how the Lead Agency will work within its allocated core funding in the future. The narrative should not exceed five pages.
- There are two primary causes that have contributed to the deficit that we are currently facing. The first driver is the increase in out of home care in Escambia County which today is approximately 750 children. Due to the increase of children coming into care in Escambia County, FFN hired an additional 15 case managers, 3 unit supervisors, and 3 family support workers. The costs of these additional staff exceed \$1,000,000 in salaries and benefits alone. Also, there was an increase of 171 children served in-home in Fiscal Year 2018-2019 compared to FY2017-2018 which necessitated need for additional case management positions. This additional expense does not include the housing cost of these children in care. The second driver, as reported earlier, FFN Leadership is looking to fortify prevention/diversion services to ensure that all four counties have appropriate alternatives to shelter care. They are also working with the GAL and judiciary as well as Children's Legal Services on a Home for the Holidays project in order to expedite permanency wherever possible through wraparound services. The goal of this process is to return children home earlier on if the safety factors have been mitigated. FFN is currently at 13.5 months average to permanency. These efforts are aimed at reducing this average to less than 12 months.
- FFN is probably short 75-100 foster homes throughout the four county areas in order to meet the current need. Due to the lack of traditional options over the past couple of years FFN has utilized group care. As stated above many of these children are aged 12 and under and FFN will begin stepping these children into traditional foster care once the Fostering through Faith ministry begins to see results. The cost of group care tends to be between four to five times higher than the cost of traditional foster care. This has led to a deficit of at least \$1,000,000. Based on the above noted drivers we have realized a deficit of over \$2,000,000. During the recent budget exercise which included other program efficiencies we were able to reduce this \$2,000,000 deficit from Fiscal Year 2018-2019 down to \$950,000 projected deficit in Fiscal Year 2019-2020. FFN has several

initiatives that we are implementing that are intended to reduce costs across the organization and allow for FFN to be financial viable with the core funding allocation.

Lead Agency Name: FamiliesFirst Network of Lakeview Center, Inc.

Region: Circuit 1

Contract No.: AJ495

Lead Agency CEO/ED Name: M. Allison Hill

Please confirm the following:

The Lead Agency will submit a SFY 2019-2020 Financial Viability Plan.

Yes No


The Lead Agency has actively worked its SFY 2018-2019 Financial Viability Plan.

Yes No

Did the Lead Agency receive Risk Pool funding in SFY 2018-2019?

Yes No

If Yes, please attach a status update on the recommendations made by the Risk Pool Committee.



Lead Agency CEO/ED Signature

9/13/19
Date

CFO

Exhibit A

Section 409.990(7), Florida Statutes:

(a) The department, in consultation with the Florida Coalition for Children, Inc., shall develop and implement a community-based care risk pool initiative to mitigate the financial risk to eligible lead agencies. This initiative must include:

1. A risk pool application and protocol developed by the department which outlines submission criteria, including, but not limited to, financial and program management, descriptive data requirements, and timeframes for submission of applications. Requests for funding from risk pool applicants must be based on relevant and verifiable service trends and changes that have occurred during the current fiscal year. The application must confirm that expenditure of approved risk pool funds by the lead agency will be completed within the current fiscal year.

2. A risk pool peer review committee, appointed by the secretary and consisting of department staff and representatives from at least three nonapplicant lead agencies, which reviews and assesses all risk pool applications. Upon completion of each application review, the peer review committee shall report its findings and recommendations to the secretary, providing, at a minimum, the following information:

- a. Justification for the specific funding amount required by the risk pool applicant based on the current year's service trend data, including validation that the applicant's financial need was caused by circumstances beyond the control of the lead agency management;

- b. Verification that the proposed use of risk pool funds meets at least one of the purposes specified in paragraph (c); and

- c. Evidence of technical assistance provided in an effort to avoid the need to access the risk pool and recommendations for technical assistance to the lead agency to ensure that risk pool funds are expended effectively and that the agency's need for future risk pool funding is diminished.

(b) Upon approval by the secretary of a risk pool application, the department may request funds from the risk pool in accordance with s. 216.181(6)(a).

(c) The purposes for which the community-based care risk pool shall be used include:

1. Significant changes in the number or composition of clients eligible to receive services.

2. Significant changes in the services that are eligible for reimbursement.

3. Continuity of care in the event of failure, discontinuance of service, or financial misconduct by a lead agency.

4. Significant changes in the mix of available funds.

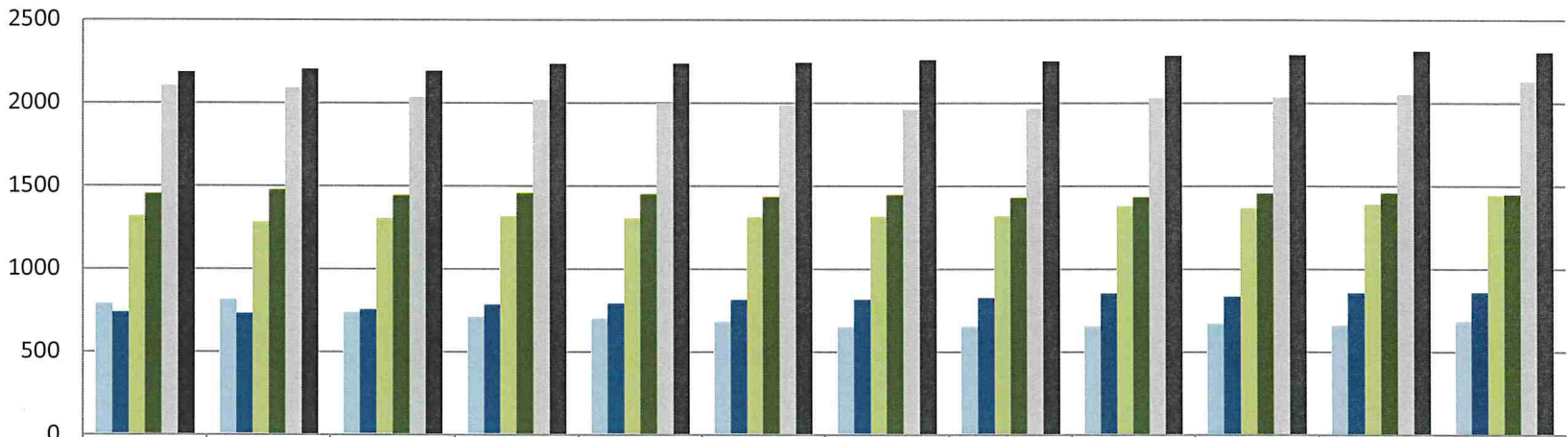
(d) The department may also request in its annual legislative budget request, and the Governor may recommend, that the funding necessary to effect paragraph (c) be appropriated to the department. In addition, the department may request the allocation of funds from the community-based care risk pool in accordance with s. 216.181(6)(a). Funds from the pool may be used to match available federal dollars.

1. Such funds shall constitute partial security for contract performance by lead agencies and shall be used to offset the need for a performance bond.

2. The department may separately require a bond to mitigate the financial consequences of potential acts of malfeasance or misfeasance or criminal violations by the service provider.

A potential result of an ongoing upward trend in removals over the past several years without a matching increase in community resources, is an increase in the number of children being served at one time by Families First Network.

Children Receiving Services
Comparing SFY 17-18 and SFY 18-19
 Source: DCF Dashboard



	July	August	September	October	November	December	January	February	March	April	May	June
SFY 17-18 In Home	788	813	734	707	698	679	648	651	653	670	661	687
SFY 18-19 In Home	735	728	751	781	789	811	812	823	852	833	855	858
SFY 17-18 OHC	1315	1278	1301	1312	1301	1308	1312	1315	1377	1365	1390	1445
SFY 18-19 OHC	1450	1475	1442	1454	1448	1432	1446	1428	1432	1455	1458	1448
SFY 17-18 Total	2103	2091	2035	2019	1999	1987	1960	1966	2030	2035	2051	2132
SFY 18-19 Total	2185	2203	2193	2235	2237	2243	2258	2251	2284	2288	2313	2306

For State Fiscal Year 2018, Circuit One did see a drop in overall removals. However, the removals still are part of an overall upward trend.

Jul-17	50	Jul-18	80
Aug-17	56	Aug-18	107
Sep-17	83	Sep-18	45
Oct-17	83	Oct-18	78
Nov-17	63	Nov-18	53
Dec-17	65	Dec-18	44
Jan-18	79	Jan-19	77
Feb-18	82	Feb-19	51
Mar-18	134	Mar-19	58
Apr-18	61	Apr-19	89
May-18	100	May-19	92
Jun-18	109	Jun-19	62
SFY 17-18	965	SFY 18-19	836

Status Updates on Risk Pool Application

1. FFN understands that the Risk Pool funding is a stop gap resource to mitigate unanticipated changes in the number of clients served. As noted earlier, FFN Leadership is working with community partners in order to maximize front end service options and is also working with GAL and judiciary partners in order to increase timely permanency for children in our care. These efforts are meant to “right size the organization.” The goal is to decrease out of home care by 15% within 12 months as well as to reduce children in licensed group care by 50%. FFN believes that this “right sizing” will allow the organization to be financially viable in the upcoming fiscal year.
2. Safety Management Services (SMS) are intended to manage safety threats and reduce risk of child maltreatments identified by the CPI by locating formal safety supports. SMS are available for investigations prior to the completion of an Investigative Family Functioning Assessment (FFA) and up to 30 days with a focus that child safety is non-negotiable, but the paths chosen to reach the safety goal are many and unique to the individual family dynamics.
FFN In-Home Non-Judicial (IHNJ), structured after the FAST model utilized by Family Support Services of North Florida, provides services when a family has consented to accept intensive supervision and services aimed at stabilizing the family home. The purpose of IHNJ services is to ensure the protection of unsafe children who have experienced abuse or neglect so that they can safely remain in the home. The program provides services for 6-12 months depending on the service needs of the family. Initially FFN started with one unit per service area with the exception of Navarre and Walton County. Due to growth in 2019, we added a second fully staffed unit in Escambia County as well as a unit in Walton County. In September 2019 there are 6 units serving 441 children with in-home safety plans compared to 3 units serving 202 children in September 2017.
3. See above regarding Faith Based initiative. Children will be stepped out of residential group care with an initial focus on children twelve and under.
4. FFN definitely has a high percentage of placement moves which is having an effect on performance and permanency for children. There appears to be two drivers contributing to this challenge. The first driver is the lack of an assessment center where children can be placed on a short term basis in order to receive trauma focused interventions as well as to establish a functional assessment to determine the best long term placement options for each child. FFN Leadership is working with Lakeview Behavioral Health Leadership to open an assessment center in the near future. The center will allow us to make the best placement the first time and will reduce placement disruptions in the future.
The second driver as noted above is placement capacity. We anticipate being able to overcome this challenge through the Faith Based Initiative noted above. We will begin in Escambia County which demonstrates the highest need for foster homes at this time.
5. FFN Leadership is working to fortify prevention/diversion services in all four counties. As reported earlier, they are also working to increase traditional foster care options to decrease children in residential group care. FFN has established a solid foundation with

its Kinship Care Program which will allow us the opportunity to utilize Kinship as a viable option to reduce the number of children going into licensed care.

6. FFN Leadership is working with the judiciary and other community partners to establish efficiencies in the dependency process to decrease length of stay in foster care. One such example noted above is the partnership with the GAL and CLS called "Home for the Holidays". FFN is also looking at the array of after care services post re-unification to reduce the rate of re-abuse seen after re-unification. FFN is currently working with the local DCF leadership to assist with moving the adoption process along in a timelier manner. DCF Interim Regional Managing Director, Courtney Stanford, has offered help to FFN to assist in moving cases that are pending adoption to finalization. Currently there are about 100 children in this status that need to be finalized.

Lakeview Center / Families First Network

Fiscal Year 2019 - Quarterly Report

	Actual First Quarter	Actual Second Quarter	Actual Third Quarter	Actual Fourth Quarter	Total
Revenue					
CBC State Revenue (AJ495 Only)*	12,306,464	12,306,464	12,442,645	14,782,694	51,838,268
CBC State Revenue (Adoption Incentive)	-	-	10,500	200	10,700
Parent Café State Revenue	37,100	37,100	37,100	37,100	148,400
Wendy's Wonderful Kids Grant	23,454	(196)	12,774	-	36,032
CBC Foundation Grant	5,091	11,005	10,609	11,220	37,926
Other Revenue**	149	172	125	150	595
Total Revenue	12,372,258	12,354,546	12,513,752	14,831,364	52,071,920
Expenses					
Salaries & Wages	2,809,220	3,073,125	3,050,123	3,219,312	12,151,780
Benefits	958,539	857,256	900,051	900,389	3,616,235
Total Personnel Costs	3,767,759	3,930,381	3,950,173	4,119,701	15,768,014
Building Occupancy	256,263	260,082	261,656	260,502	1,038,503
Professional Services	115,901	101,548	112,036	101,485	430,971
Adoption Legal Fees (MP000)	50,000	101,000	58,800	62,000	271,800
Total Professional Services	165,901	202,548	170,836	163,485	702,771
Travel	291,022	258,658	251,026	326,789	1,127,494
Equipment	21,165	138,457	51,538	121,900	333,060
Subcontracted Services	-	-	-	-	-
Wraparound	449,656	484,983	480,269	508,960	1,923,868
In-Home Support	373,901	326,564	372,096	362,615	1,435,176
IFPR	67,191	41,539	56,012	60,017	224,759
Family Care	12,533	19,769	17,562	23,612	73,474
Foster Home Development	104,262	149,739	169,210	202,578	625,789
Adoption Support Team	120,710	120,983	103,434	118,363	463,489
Visitation	22,704	22,704	22,704	22,704	90,816
Independent Living	386,759	419,121	422,014	406,744	1,634,637
Sub-provider Training	-	5,117	30,342	27,577	63,036
Training	67,852	67,852	67,852	67,852	271,407
100806-	44,270	48,430	62,392	49,479	204,572
Shelter and Residential	1,480,441	1,535,767	1,404,605	1,770,790	6,191,604
Foster care Subsidies	974,872	927,014	1,018,824	1,071,715	3,992,425
Adoption Subsidies	3,256,091	3,318,089	3,334,848	3,459,421	13,368,449
Respite	8,279	4,185	4,155	2,325	18,944
Other	89,961	51,786	122,265	240,910	504,922
Total Subcontracted Services	7,459,481	7,543,643	7,688,583	8,395,661	31,087,368
Insurance	58,792	45,192	48,969	45,366	198,319
Operating Supplies	318,431	319,054	262,794	270,644	1,170,922
Total Direct Expenses	12,338,813	12,698,015	12,685,575	13,704,048	51,426,452
Support Costs	7,607	14,188	13,795	14,221	49,812
Administrative Costs	473,183	371,683	326,114	379,279	1,550,260
Total Expenses	12,819,603	13,083,887	13,025,484	14,097,549	53,026,523
Non - Allowable Costs***	126,376	77,557	97,054	42,154	343,141
Total Allowable Expenditures to AJ495	12,693,228	13,006,330	12,928,430	14,055,394	52,683,382
FY17-18 Carryforward Deficit (AJ495)	2,667				
FY18-19 Generated Carryforward/(Deficit) (AJ495)	(386,764)	(699,865)	(485,785)	727,300	(845,114)

Total FY18-19 Carryforward/(Deficit) (842,447) **d**

**includes grant & contribution revenue

Additional IL Funds based on current expenses/budget
FY18/19 Risk Pool Dollars (45,394)

***includes other expenses not related to AJ495

Projected carryforward/(Deficit) (887,841)

a Includes expenses related to behavioral foster care and the Parent Café grant

b Total MAS expenses are a combination of adoption subsidies and adoption legal fees.

c Includes Medical and Pharmacy expenses, Purchase of Service, Clothing Allowances, and Other operating expenses.

d Carryforward/(Deficit)

Lakeview Center / Families First Network

Fiscal Year 2020 - Quarterly Report

	Actual/Projected First Quarter	Projected Second Quarter	Projected Third Quarter	Projected Fourth Quarter	Total
Revenue					
CBC State Revenue (AJ495 Only)*	13,354,343	13,354,343	13,354,343	13,354,344	53,417,374
CBC State Revenue (Adoption Incentive)	293,281	-	-	-	293,281
Parent Café State Revenue	37,100	37,100	-	-	74,200 a
Wendy's Wonderful Kids Grant	-	-	-	-	-
CBC Foundation Grant	6,895	6,457	-	-	13,352
Other Revenue**	146	147	125	137	555
Total Revenue	13,691,766	13,398,047	13,354,468	13,354,481	53,798,762
Expenses					
Salaries & Wages	3,196,238	3,198,826	3,157,560	3,157,559	12,710,183
Benefits	826,668	872,938	868,356	868,356	3,436,318
Total Personnel Costs	4,022,906	4,071,764	4,025,916	4,025,915	16,146,501
Building Occupancy	280,576	282,713	283,709	282,713	1,129,709
Professional Services	93,632	106,646	106,646	106,646	413,569
Adoption Legal Fees (MP000)	81,584	81,999	81,999	81,999	327,581 b
Total Professional Services	175,216	188,645	188,645	188,645	741,150
Travel	308,582	304,252	299,252	301,752	1,213,838
Equipment	114,184	104,147	103,147	101,647	423,126
Subcontracted Services	-	-	-	-	-
Wraparound	462,806	478,093	474,093	476,093	1,891,083
Safety Management	347,814	344,684	340,684	342,684	1,375,866
IFPR	60,602	59,084	58,084	57,584	235,355
Family Care	10,283	18,391	18,391	18,391	65,457
Foster Home Development	155,610	181,950	181,950	176,950	696,460
Adoption Support Team	122,431	125,746	124,746	122,746	495,670
Visitation	24,604	25,554	25,554	25,554	101,266
Independent Living	434,408	482,181	477,513	477,438	1,871,539
Sub-provider Training	7,494	9,726	9,226	8,726	35,171
Training	67,852	67,852	67,852	75,760	279,315
100806-	72,522	72,528	72,528	72,528	290,106
Shelter and Residential	1,809,903	1,312,622	1,244,720	1,191,084	5,558,328
Foster care Subsidies	1,036,620	1,156,115	1,098,541	1,051,993	4,343,269
Adoption Subsidies	3,466,480	3,504,659	3,466,670	3,466,670	13,904,478 b
Respite	4,951	3,839	3,798	3,798	16,386
Other	65,178	82,698	82,698	82,698	313,272 a
Total Subcontracted Services	8,149,558	7,925,722	7,747,047	7,650,696	31,473,023
Insurance	46,777	47,678	47,678	47,678	189,811
Operating Supplies	318,659	256,834	256,834	256,834	1,089,162 c
Total Direct Expenses	13,416,457	13,181,756	12,952,228	12,855,881	52,406,322
Support Costs	13,820	14,339	14,326	14,293	56,778
Administrative Costs	395,127	395,317	400,080	400,162	1,590,686
Total Expenses	13,825,404	13,591,412	13,366,635	13,270,336	54,053,786
Non - Allowable Costs***	355,177	75,000	75,000	75,000	580,177
Total Allowable Expenditures to AJ495	13,470,227	13,516,412	13,291,635	13,195,336	53,473,609
FY18-19 Carryforward Deficit (AJ495)	(887,841)	-	-	-	-
FY19-20 Generated Carryforward/(Deficit) (AJ495)	(115,883)	(162,068)	62,709	159,007	(56,235)
			Total FY19-20 Carryforward/(Deficit)	(944,076)	

**includes grant & contribution revenue

***includes other expenses not related to AJ495

Projected carryforward/(Deficit) (944,076)

- a** Includes expenses related to behavioral foster care and the Parent Café grant
- b** Total MAS expenses are a combination of adoption subsidies and adoption legal fees.
- c** Includes Medical and Pharmacy expenses, Purchase of Service, Clothing Allowances, and Other operating expenses.