
**Indiana Title IV-E Child Welfare
Waiver Demonstration Project**

Final Evaluation Report

Executive Summary

**Prepared for
Division of Family and Children
Family and Social Service Administration
State of Indiana**

**Prepared by
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September 2003

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Introduction

The Department of Health and Human Services, under Section 1130 of the Social Security Act, approved the State of Indiana's request for a waiver on July 18, 1997 to operate a statewide child welfare demonstration project. Implementation of the IV-E-FC project was begun on January 1, 1998, administered and operated by the Indiana Division of Family and Children (DFC) of the Family and Social Service Administration (FSSA). The demonstration project ran five full years (60 months) through December 31, 2002.

Purpose. The Indiana Child Welfare Waiver Demonstration was designed to provide home and community-based alternatives to group and institutional care and to insure children are protected in safer environments with supportive services. Its focus was on reducing out-of-home placements through the provision of intensive services to families and children and, when placements were made, on expediting family reunification. A particular goal of the waiver was reducing the use of out-of-state residential facilities and its accompanying disruption to families and high costs to taxpayers. The project was envisioned as both a more cost effective response to child abuse and neglect and adolescent delinquency and one that was expected to lead to improved family functioning and child well-being.

Population. The pool of children allowed to be served under the waiver and targeted by the state included: 1) children identified through the agency's Child in Need of Services (CHINS) placement process; 2) children involved in substantiated reports of child physical abuse, sexual abuse, and neglect; 3) adjudicated delinquent children; and 4) other children identified as being "at risk" of abuse, neglect, or delinquency. The terms and conditions of the Indiana waiver effectively permitted any child being served by DFC to be selected for waiver services, within the limits of the slots made available to a particular county.

Evaluation. In December 1998, FSSA contracted with the Institute of Applied Research (IAR) of St. Louis, Missouri to plan and conduct an evaluation of the demonstration. The evaluation was composed of three distinct but related studies: a process study that examined the implementation of the demonstration project and utilization of the waiver; an impact study that focused on outcomes and changes in the lives of children and families as a result of the waiver; and a study of the cost effectiveness of the demonstration.

Major data sources for the evaluation included extractions from the Indiana Child Welfare Information System (ICWIS); detailed case-specific information collected from CPS workers on a sample of cases; cost information collected from county bookkeepers on a second sample of cases; site visits to county offices coupled with interviews of OFC staff and other stakeholders; surveys of county OFC administrators at the beginning, mid-point and end of the demonstration; surveys of CPS workers and community stakeholders within communities in the first year of the demonstration and again at its conclusion; surveys and interviews with waiver and control-group families throughout the demonstration; interviews with state-level and regional administrators of DFC; and a review of a wide variety of documentary material.

The process and impact studies, while each distinct, overlapped in a number of critical ways, including research methods, data collection and analysis. In addition, because the process study yielded information pertaining to variations in the program across the state, differences in the intervention or treatment being assessed in the impact study, the two studies became integrally linked. The impact study was quasi-experimental in design. Variations in the program represented differences in the experimental treatment. Findings from the process study about these variations were therefore introduced into outcome analyses in the impact study.

The nature of the waiver demonstration project in Indiana (its statewide character and the broad discretion given to counties in the assignment of cases to the waiver) precluded the random assignment of experimental and control cases as well as the selection of comparison cases from areas of the state not participating in the waiver. The issue of control cases, as a result, was addressed through a process of case matching in which evaluators matched each child assigned to a waiver slot with a corresponding non-waiver child. This process yielded a control group of non-waiver children comparable to the experimental group children assigned to the waiver on a set of available demographic, geographic and case-related variables.

The cost effectiveness study was designed around samples of waiver and control group cases and utilized an internet-based data collection procedure that collected financial data from county bookkeepers. In this evaluation, the cost neutrality and cost-effectiveness analyses were completely separate and distinct. The methodology for determining cost neutrality utilized historical data and national growth figures combined with costs associated with all waiver and all non-waiver cases—non-waiver cases were not limited to matched control cases. Neither the methods nor the data used for the cost-effectiveness study and the cost-neutrality analysis overlap to any usable degree.

Process Study

Planning. While counties were given broad latitude in the design, development and operation of the waiver in their localities, their plans were required to conform to parameters laid down by DFC. The state’s original waiver application to HHS was developed with help from an interagency working group. Individual counties, in turn, were required to convene their own planning group to develop an inter-agency agreement and implementation plan. The plan specified the population targeted for services, the services to be provided, and the collaboration expected among key county institutions and agencies. This last requirement was viewed as an important aspect of the demonstration in Indiana and, in most counties, was built upon existing inter-agency collaboratives. The role of county judges was particularly critical because the legal charge for assignment of children to the waiver group resided with Circuit Court Judges.

Waiver Utilization. During the five-year demonstration period, the number of unduplicated children assigned to the waiver was 5,277. A cap of 4,000 children at any one time was placed on the waiver in Indiana. Actual waiver usage fell well below this figure. Throughout the five-year period, the average daily number of waiver children was 1,112. It rose from 641 during the first year to 1,348 during the fifth year. While the number of cases assigned to the waiver fell below what was permitted under the terms and conditions, this primarily involved cases of families who met title IVE eligibility criteria. Over the course of the demonstration, there were more cases assigned to the waiver that involved families who were not eligible for IVE services (2,985) than families who met IVE eligibility criteria (2,292).

Program Variations. Given the statewide nature of the demonstration, and the flexibility granted to counties in the design of the program to fit local conditions and priorities, it was not surprising to find significant variations in the way the waiver was approached from one county to another. While there were many similarities in the waiver plans of a large number of counties, due mainly to the prototype plan provided by DFC, there were also important differences in their focus. There were differences in the types of cases targeted, services emphasized and inter-agency agreements entered into. There were differences as well in the composition, strengths and histories of the county collaboratives that formed the basis of most planning groups. Counties also varied considerably in how much they used the waiver. Many of the counties with high usage figures requested and were given additional slots from low usage counties.

“Early Implementers.” Responding to this reality, by the second year of the project, evaluators began distinguishing certain counties as “early implementers” when

compared to other counties. The distinction was based on a number of key indicators, including utilization of slots that had been allocated, specificity of targeting or prioritizing cases, and utilization of a specific approach to intervention or case planning, among others. The recognition of certain counties as early implementers had implications for the evaluation of the project. From the perspective of the research design, program variations represented differences in the “experimental treatment” being evaluated. There were essential assumptions in that design— that the flexibility allowed through the waiver would result in new or different types of case planning, new or different menus of services, and/or new or different modes of service delivery that would be available to cases assigned to the waiver but not to non-waiver cases approached in the traditional manner. Only on this basis would one expect to detect outcome differences between waiver and matched comparison cases. Where these elements of the program were undeveloped or not fully implemented, case-specific experimental effects could not reasonably be expected. Accordingly, this distinction was integrated into the impact study and analyses.

“Program Counties.” As the waiver progressed, many of the counties identified as early implementers continued to operate active waiver programs that utilized a high percentage of their slots and remained faithful to the intensive services model originally envisioned by the state. There were other counties that had been initially designated as early implementers that did not use the waiver as much as early plans suggested they might or, in their operations, focused primarily on fiscal rather than programmatic opportunities provided by the demonstration. At the same time, there were counties that, after a more measured start, made above average use of the waiver and, importantly, focused on the programmatic opportunities the waiver provided and maintained a high degree of fidelity to the intensive services model and the primary purposes of the demonstration. These counties saw the waiver as much more than a new way to pay for the same thing.

By the final year of the demonstration it was possible to distinguish a group of 25 counties firmly established at the high end of the active-use and model-fidelity spectra. These counties augmented their child protection programs in specific ways to take advantage of opportunities presented by the waiver. Frequently this involved expanding ongoing, local initiatives, most often focused on community-based and in-home services. It often involved new initiatives to bring needed services to children who would not have otherwise received them. Virtually always, it involved finding new ways to increase the nature and extent of available services aimed at avoiding or shortening out-of-home placements. Distinguishing counties along these two dimensions—active utilization and model fidelity—resulted in the recognition of fundamental program variations that were

interpreted as differences in the experimental treatment being studied in this evaluation. As was the case with the earlier designation of “early implementing” counties, this final distinction among counties in the development and operation of their waiver programs was introduced into process, impact and cost analyses to better understand the effects of the waiver when implemented more fully and with greater fidelity to the original vision.

Attitudes and Perspectives. At the conclusion of the demonstration period, a large majority of county OFC administrators, including all who used the waiver extensively and many who used it more sparingly, held a positive attitude toward the waiver and wanted to see it continued. Three out of four reported that the waiver meant that some children and families received services they would not have otherwise received and nearly 8 in 10 believed that the waiver’s flexibility improved service effectiveness. Administrators and case managers from counties identified as “program counties” tended to use the waiver more and also tended to be more positive about it. In addition, community stakeholders from program counties were more likely to be knowledgeable of the waiver, to report that it led to new service opportunities and improved working relationships with the OFC, and to want to see it continued.

A large number of county administrators reported specific positive changes to their child protection programs as a result of the waiver. This included improved services to families with children at risk of placement, a decrease in use of out-of-home placement, an increase in home-based and community-based services, a perceived increase in satisfaction among families assigned to the waiver, and improved services to families with children in placement settings.

Many OFC administrators and family case managers indicated a need for additional training related to the waiver. About half of the case managers surveyed believed that insufficient training had lessened the effectiveness of the waiver in their county. A majority of workers indicated that the waiver had not had any substantial effect on their workload, caseload size or job-related stress.

Planning Partners. In some counties, individuals from key community agencies and institutions who had been involved as waiver planning partners continued to play a central role in the waiver project, although this was the less common situation across the state. In a majority of counties the involvement of planning partners in the waiver quickly diminished after the planning phase ended, and many hopes for a revitalized relationship between the OFC and schools or other community agencies went unrealized. At the same time, half of the community stakeholders surveyed at the end of the demonstration reported that a collaborative agreement had been developed between their

office and the local OFC. And, exemplary models of community wrap-around teams were developed or strengthened because of the demonstration. For their part, Juvenile Judges had an ongoing and mandated role in the waiver as they had the legal charge for assigning children to the waiver. A solid majority of administrators reported having no difficulties with Juvenile Court over the waiver, and only a small number indicated that Juvenile authorities represented a major problem for them in utilizing the waiver.

Impact Study

The impact study focused on determining whether certain improved outcomes for children and families resulted from the implementation of the waiver. Impact analyses included the comparison of all waiver and matched non-waiver cases, comparison of study samples of waiver and matched non-waiver cases on which more detailed data was obtained, and comparison of waiver cases in program counties with their matched non-waiver cases. These latter analyses were most useful in determining the effects of the waiver in situations in which it was more fully utilized.

Impact analyses found the waiver to be positively associated with certain immediate experiences of the child and his or her family. This included increased services, increased community-based services, increased family-oriented services, placement avoidance, shortened length of time in placement, increased reunification, improved educational experiences, and increased family satisfaction. While statistically significant, such differences between waiver and non-waiver cases were often modest and sometimes found only when cases from program counties were compared with their matched non-waiver cases. Statistically significant differences were not found in more remote outcomes, such as recurrence of child abuse and neglect or subsequent placement episodes, although statistical trends were sometimes found.

Services to Families. The evaluation found that significantly more services were delivered in waiver cases and the pattern of services shifted toward those that promote family stability. Waiver cases received significantly more family preservation services, individual counseling, childcare and respite care, help with basic household needs, and special education services. In addition, differences were large and approaching statistical significance for homemaker services, and for marital, family or group counseling. A greater percentage of control children had clothing and supplies in placement because more control children were in placement and for longer periods of time.

The emphasis on utilizing Title IVE funding to avert placement of children or to shorten the length of placement produced a shift toward services oriented to maintaining

family stability. Most of the areas of difference between the waiver and control groups refer to services to families while a child was in the home—FPS, homemaker, childcare, respite care, recreational. Others, such as help in getting financial or medical assistance, were family-oriented. In addition, waiver families received significantly more community-based services overall.

Significant differences were found when the reports of waiver families from program counties were compared with those of all control families. Differences in the provision of parenting instruction, support groups, emergency food, recreational services for children, clothing and household goods, homemaker and home management services, and taking children to activities were all statistically significant. Major exceptions were medical and dental care, public assistance services, job training and employment services, and legal services.

Placement Avoidance. The number of children placed in out-of-home care (foster and institutional) declined each month during the demonstration. There were 10,139 children in placement in the month of January 1997 (a year before the waiver program began). This number fell to 9,377 children by December 2002. At the same time, a growing number of children were assigned to the waiver during the demonstration who were not in out-of-home placement. For the last month of the demonstration this figure was 1,143. The proportion of waiver children in program counties who were never placed while assigned to the waiver was 45.6 percent compared with 38.0 percent of the matched non-waiver children, a statistically significant difference.

Out-of-State Placement. The rate of children in placement settings outside the state of Indiana declined steadily during the demonstration from 45 per 1,000 in January 1998 to 25 per 1,000 in December 2002. Among waiver children removed and placed outside their homes in program counties, 1.5 percent were placed out-of-state compared to 3.3 percent of control children, a statistically significant difference and one that suggests that some portion of the decline in statewide rates of children in out-of-state placement was due to the waiver.

Distance from Home to Placement Setting. Placing children relatively close to their natural homes facilitates visitation of children with their parents and in this sense is thought to increase the likelihood of reunification. One of the state's waiver goals, therefore, was to reduce the distance between placement settings and homes of natural families. The monthly average distance from home to placement setting for all placed children at the beginning of the waiver was 57 miles and declined to 44 miles at the end of the demonstration. The average distance of placed waiver children in program

counties was 22.2 miles compared to 26.3 miles for matched control children. Although in the expected direction, this difference was not statistically significant.

Length of Placement. Length of placement, or a placement episode, refers to the period from removal to outcome, whether the outcome is reunification, adoption, guardianship, or independent living. A child may be in the care of one or several different placement providers during this period. Length of placement was calculated in days for all waiver and matched control children during their “target case.” The target case refers to the case that brought the child into the study population. For the waiver child it was the case in which he or she was first assigned to a waiver slot.

Within program counties, mean length of placement for all waiver children who were removed from their homes was 290 days compared with 316 days for matched control children. This difference was a statistical trend. Among sample cases, controlling for risk and severity of child abuse and neglect, severity of delinquency, and age of child, the mean length of placement for waiver children was 271 days and for control children it was 319 days. (These differences applied only to the portion of waiver children whose placement had begun during the waiver demonstration and not to children already in placement before the waiver began.) The relative reduction in length of placement of waiver children in program counties compared with their control counterparts was 8.2 percent. In the study sample, controlling for relevant differences among children and families, the relative reduction in length of placement due to the waiver was 15.0 percent.

Outcomes of Placement. The outcome at the conclusion of out-of-home placement reflects the final order of the juvenile or family court for the child.

Reunification. Children who were both placed and assigned to waiver slots were reunified with their parents significantly more often than control children: 76.7 percent of waiver children were reunified either with the original caretaker or with a non-custodial parent compared to 66.0 percent of control children.

Termination of Parental Rights. Among cases that were opened after the start of the demonstration, the time from the start of placement to the beginning of the TPR process was significantly longer in waiver cases (mean of 688 days) than in matched control cases (mean of 620 days). Since there were more family reunifications in waiver cases, this difference may reflect the additional time and effort taken to reunify these families. This may be reflected as well in the frequency of TPRs, which occurred in 7.4

percent of waiver cases and 10.3 percent of control cases. (In program counties TPR occurred in 5.7 percent of waiver cases and 9.3 percent of control cases.)

Adoption. While a greater percentage of waiver children were reunified, cases in which alternative permanent situations were not required, a significantly greater percentage of control children were placed with prospective adoptive parents: waiver, 3.4 percent; control, 7.1 percent. The mean number of days from removal to adoption was slightly less for waiver cases (763 days) than control (798 days) but the difference was not statistically significant.

Independent Living. There was interest at the initiation of the evaluation in whether the waiver might have an effect on the independent living program in the state. However, only a handful of program county children were found in the state data system for whom a placement was categorized as independent living, too few to permit any analysis. A larger set of children who were in foster or residential care beginning at about age 15 years began to receive independent living *services*. Among cases in the sample, where service information was sought directly from the case manager, 3.1 percent of control children versus 2.5 percent of waiver children were placed in transitional living programs, and 8.4 percent of control children versus 8.7 percent of waiver children had been enrolled in life-skills training. Neither of these differences was statistically significant.

Subsequent Placement. Subsequent placement refers to any new removal of a child after the end of the target case, whether or not the child had been removed during the target case. To control for differences in time between the end of the target case and the end of data collection or the child's 18th birthday (the opportunity period for placement recurrence) the subsequent placement measure was calculated as a ratio to the number of days of opportunity as a standard score. Children who were placed during the target case or during an earlier case were more likely to be placed again during the opportunity period, regardless of whether they were assigned to the waiver or not. No differences were found between waiver and control children when the opportunity period was taken into account.

Recurrence of Child Abuse and Neglect. Another important measure of long-term effects of child welfare programs is recurrence of child abuse and neglect reports and of substantiated investigations. The measurement of program recurrence began after the conclusion of the target case and like the analysis of placement recurrence, took into account the opportunity period for new reports, as well. No differences were found between waiver and control cases in the raw proportions of new reports or substantiations

nor in the proportions when opportunity periods were taken into account. This was true for all types of reports, as well as for the general categories of neglect, physical abuse, sexual abuse and multiple types within the same report. Furthermore, no differences were found between waiver and control cases when specific types of child abuse and neglect were examined within these general categories.

School Performance. School performance has been taken as an important indicator of child well-being and a measure of improvement in the development of children. Overall, a higher percent of school-age children assigned to the waiver were in school (91.1 percent) than were control school-age children (83.6 percent) at case closure. This difference was most noticeable for children adjudicated delinquent: 87.0 percent of delinquent youths in waiver cases were in school at case closure compared with 71.6 percent of their control counterparts. Among CA/N children, the difference was very small. Among all waiver children in the study population who were 17 and older, 24.7 percent were not attending school at the close of the case compared with 40.0 percent of all matched control children. Among CA/N youths in this older age group, 23.3 percent of those assigned to the waiver were not in school while the percent for older control youths was 37.0 percent. Among delinquent youths the difference was again somewhat greater, with 25.4 percent of waiver youths not in school compared with 41.9 percent of control youths.

Family Satisfaction. When responses of all waiver families providing feedback on satisfaction indices were compared with all control families, no significant differences were found. Within program counties, however, waiver families were more likely to report that their children were better off because of the involvement of the child protection agency and were somewhat more likely to report that they were involved in decisions made about their case.

Cost Study

Data collection for cost effectiveness was designed around samples of waiver and control group cases rather than the entire population. Children were sampled from the first two and a half years of the program (from January 1998 through June 2000). Expenditures on each child and the child's family were tracked for 24 months after the case began for that child. These included all expenditures for the child, whether the child was in placement or not, and all expenditures for the caretakers or the family as a whole. However, placement costs for siblings were excluded.

Because the impact analysis focused largely on program counties, the most appropriate cost information for the was analysis was that reported by bookkeepers from

these same counties. Expenditures were reported within the following general accounting areas: child welfare services, out of home placements - foster homes, out of home placements – institutions, out of home placements - therapeutic foster homes, medicaid rehabilitation option payment, miscellaneous cost of wards, preservation services, independent living, and adoption services. The average expenditure from all sources per waiver child in program counties during the 24-month period after the case began was \$12,614 compared to \$11,123 for non-waiver children.

Outcome Measures. In a cost-effectiveness analysis, it is necessary to measure program costs and one or more measures of effectiveness. Measures of effectiveness in the context of an impact analysis refer to differences in desired outcomes between the experimental and control groups. The results of cost-effectiveness analyses are ratios of costs to effectiveness. Programs can be cost effective in two ways. Either effectiveness can be improved while costs are maintained at similar levels or effectiveness may remain unchanged or only slightly changed while costs are reduced. While either type of change may produce a corresponding change in cost-effectiveness ratios, the former is more likely in waiver programs where cost neutrality is a goal. Four outcomes were chosen for cost-effectiveness analysis: placement avoidance, out-of-state placement avoidance, reduced days in placement, and increased reunification with family.

Cost-Effectiveness. The ratio of costs to outcomes was lower in waiver cases for three of the four measures, placement avoidance, length of placement, and reunification. The figures for two years were: 1) Placement avoidance: waiver costs, \$27,662; control costs, \$29,271. 2) Reduction in length of placement: waiver costs, \$17,950; control costs, \$19,756. 3) Reunification: waiver costs, \$16,446; control costs, \$16,853. The ratio of costs to outcomes was higher for avoidance of out-of-state placement: waiver, \$12,806; control, \$11,503. This analysis applies only to the counties in which it was felt that the waiver was being actively used in ways that were most faithful to the intensive services model originally envisioned by the state (program counties). It can be thought of as an analysis that may be applied to the entire state in the future when all local offices have implemented more active waiver programs.

Conclusions and Recommendations

Why was the waiver not used more? There appear to be a number of factors that are part of the answer to this question. 1) In the view of many county OFC administrators, welfare reform and the relatively healthy economy in the early years of the demonstration reduced the pool of IVE eligible families. 2) For various reasons, many counties decided themselves to restrict the waiver to specific case types. In certain

counties this limited the potential pool of waiver candidates to a very small subset of child abuse/neglect or delinquency cases. 3) There was a persistent confusion about the waiver in some counties and among some CPS staffs throughout much of the demonstration due to insufficient training and support. Some of this had to do with the waiver as a new service program and some with required accounting and reporting procedures. 4) While administrators from certain counties served as sources of technical assistance to other counties, there was limited overall cross-county or cross-region communication about the waiver and its usage. There were relatively few structured opportunities, especially below the administrative level, for staffs to learn about exemplary practices in other locations or how particular problems were successfully dealt with. 5) The juggling of slots and capped expenditure limits slowed waiver assignment in some locations. 6) The process of reimbursing counties for waiver expenditures restricted waiver use in counties with significant financial problems. 7) The pool of IVE-eligible families may have been less than what had been anticipated at the start of the demonstration but, beyond this, the full pool of eligible families appears not to have been known to most case managers at a time when this information might have influenced case planning because eligibility determination was typically not done until after placement or assignment to the waiver. 8) Finally, it is always the case that administrators of any sort vary in their willingness or inclination to accept and adopt a new idea, product, or service. The waiver was no exception. For various reasons certain county administrators appeared to have been more predisposed to the waiver, recognizing its potential benefits as exceeding its costs in time and effort, while others remained either more skeptical of it, satisfied with their existing CPS, or were unwilling or unable to take the time needed to fully implement the new program.

Summary of Findings and Conclusions. The results of the process study indicate that many counties made good use of the waiver during the demonstration, operating strong intensive services programs that were integrated into their broader child protection systems. Some of these counties were very active in utilizing their waiver slots while others used fewer of the slots available to them. There were a number of counties with exemplary waiver programs, who used the waiver to strengthen local inter-agency collaboratives and/or found innovative ways to provide services that reduced or shortened out-of-home placement of children. At the same time there were also some counties that made limited or minimal use of the new program. And, many counties had difficulty identifying as many eligible and appropriate cases as had been anticipated at the start of the demonstration. At the conclusion of the demonstration period, a large majority of county OFC county administrators, including all who used the waiver extensively and many who used it more sparingly, held a positive attitude toward the waiver and wanted to see it continued.

The impact study found positive outcomes associated with the waiver that were statistically significant in a number of areas. These included increased services, increased community-based services, increased family-oriented services, placement avoidance, shortened length of time in placement, increased reunification, improved educational experiences, and increased family satisfaction. These results are all proximate outcomes, that is, outcomes that are associated with the immediate experiences of the child and family in the target case. The evaluation did not detect differences in *more remote outcomes*, such as child abuse and neglect recurrence or subsequent placement episodes

With respect to findings of the cost-effectiveness study, the exact dollar figures are not as relevant in the present analysis as the relative similarity of costs. If costs per child are close and the demonstration results in more positive outcomes, the demonstration will be more cost-effective as well. The increases in cost-effectiveness in three of the four outcome measures were modest in size as was the decrease in the fourth. The primary issue for cost-effectiveness as regards the waiver is not the exact dollar and cents difference attributable to waiver and control group outcomes. Rather, it is whether improved outcomes for children and families can be accomplished for the similar or reduced costs. This analysis suggests that this was the case in Indiana and argues for continuation of the waiver program under the provisions for program improvement suggested by process and impact study results.

Recommendations. The process study found that utilization of the waiver during the demonstration varied considerably across the state, both in regards to how much it was used and how it was used. The outcome study found that the waiver achieved a number of its goals during the demonstration but that its impact, while positive, was relatively modest and realized mostly within counties that utilized the waiver more actively and with greater fidelity to the intensive services model. Accordingly, recommendations have been provided that suggest steps the state might take to build upon the positive findings of the demonstration in order to increase the use of the waiver in ways that are likely to achieve improved outcomes for children and families. The following list is a summary of these recommendations:

- Provide increased and more pro-active monitoring and oversight of county waiver programs.
- Ensure that clear, concise guidelines are provided to counties on how the waiver may and may not be used.

- Review all reporting and accounting procedures and, where possible, clarify and simplify them.
- Provide on-going training to county administrators, family case managers and bookkeepers.
- Make more technical assistance and support available to counties to assist them on an individual, as-needed basis. Ensure that counties know whom to contact for specific programmatic, financial or reporting questions or problems.
- Identify specific counties that are greatly underutilizing the waiver, especially those with high rates of child poverty, for special technical assistance and support.
- Provide structured opportunities for county administrative and field staffs to share waiver experiences, positive and negative, so that they may learn from one another.
- Provide structured opportunities for counties to learn about exemplary programs and best practices that have been identified in other parts of the state or in other states.
- Insist that counties with highly restrictive waiver programs review and justify their plans.
- Consider whether the existing practice of allocating waiver slots and capping slot expenditures should be replaced with another device for managing waiver assignments and expenditures.
- Examine the possibility of establishing some method for identifying IVE eligible families at a point in time when this knowledge can impact case planning and decision-making.
- Consider how key community stakeholders may be kept better informed about the waiver.