



## Memorandum

Date . AUG 20 1996

From June Gibbs Brown  
Inspector General *June G Brown*

Subject Allocation of Title IV-E Training Costs -  
Illinois Department of Children and Family Services  
(A-05-96-00013)

To Mary Jo Bane  
Assistant Secretary for  
Children and Families .

This memorandum is to alert you to the issuance on August 22, 1996 of our final audit report. A copy is attached.

This will be the second of two reports issued to the Illinois Department of Children and Family Services (DCFS) on title IV-E training costs. We excluded the allocation issue from our prior report on title IV-E training costs (CIN: A-05-95-00022, dated February 29, 1996) because the allocation of these costs was the subject of a DCFS appeal to the Department of Health and Human Services' (HHS) Departmental Appeals Board (DAB). The DCFS filed the appeal because it believed the allocation methodology which the HHS Division of Cost Allocation sought to impose was inconsistent with the Adoption Assistance and Child Welfare Act (which established the title IV-E program) and applicable regulations. The State agency also believed the use of this methodology was not required by Administration for Children and Families (ACF) policy guidelines. In its August 1995 decision the DAB concluded that joint training costs should be allocated to all benefiting programs.

The State Agency's procedures for handling joint training costs were contrary to the requirements of Office of Management and Budget Circular A-87, which states that:

"A plan for allocation of costs will be required to support the distribution of any joint costs related to the grant program. . . ."

The circular further states that:

"A cost is allocable to a particular cost objective to the extent of benefits received by such objective. "

The State's practice was also contrary to ACF policy which requires that such costs be allocated between the Federal and State Foster Care programs in an equitable manner.

As a result of our reallocation of the joint training costs, we determined that the title IV-E program was overcharged by over \$5.8 million (Federal Share) during the period January 1, 1992 through December 31, 1994.

In a written response to our draft report, the DCFS generally agreed with the methodology used to compute the overcharges. However, it does not agree that the financial adjustment should be retroactive to January 1, 1992, the beginning of our audit period. The effective date of the adjustment is an issue that will be resolved in the State agency's appeal of a May 1996 disallowance letter that was issued to it by the Regional ACF.

The Regional ACF issued a disallowance letter to DCFS for approximately \$12 million in response to the August 1995 DAB decision which remanded the ACF to calculate unallowable title IV-E training claims affecting the period April 1, 1989 through June 30, 1995. The ACF's disallowance not only precedes and encompasses our audit period, it also extends the period of disallowance. In the disallowance letter, ACF stated its decision to require reimbursement of the \$12 million was based on the fact that DCFS was officially notified of title IV-E training policies in a disallowance letter which it had received in June 1989.

If you have any questions, please call me or have your staff contact John A. Ferris, Assistant Inspector General for Administrations of Children, Family, and Aging Audits, at (202) 619-1175. Please provide us with information on any additional actions taken on the recommendations within 60 days of the report issue date .

Attachment

**Department of Health and Human Services**

**OFFICE OF  
INSPECTOR GENERAL**

**ALLOCATION OF TITLE IV-E  
TRAINING COSTS  
ILLINOIS DEPARTMENT OF CHILDREN  
AND FAMILY SERVICES**



**JUNE GIBBS BROWN  
Inspector General**

**AUGUST 1996  
CIN: A-05-96-00013**



DEPARTMENT OF HEALTH AND HUMAN SERVICES

REGION V  
105 W. ADAMS ST  
CHICAGO, ILLINOIS 60603.6201

OFFICE OF  
INSPECTOR GENERAL

Common Identification No. : A-05-96-00013

Jess McDonald, Director  
Illinois Department of Children  
and Family Services  
406 East Monroe Street  
Springfield, Illinois 62701

Dear Mr. McDonald:

Enclosed for your information and use are two **copies** of the Department of **Health** and Human Services, Office of Inspector General audit report entitled, "**Allocation** of Title IV-E Training costs. "

**Final** determination as to actions taken on all matters reported **will be** made by the **HHS** action official. We request **that** you respond to **the** HHS official within 30 days from **the** date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the **final** determination. **It** should be directed to: Regional Administrator, Administration for Children and Families, Region V, 105 West Adams Street, **20th Floor, Chicago, Illinois 60603.**

In accordance with the principles of the Freedom of Information Act (Public Law 90-23), Office of Inspector General audit reports issued to the Department's grantees and contractors are made available, **if** requested, to **members** of the press and general public, to the extent information contained therein is not subject to exemptions in the Act, which the Department chooses to **exercise** (See 45 CFR Part 5) .

To facilitate identification, please **cite** Common Identification Number (**CIN**) A-OS-96-00013 in all correspondence relating to this report .

Sincerely,

Paul Swanson  
Regional Inspector General  
for Audit Services

Enclosures



SUBJECT : Letter Report on the Allocation of Title IV-E Training Costs Illinois Department of Children and Family Services Springfield, Illinois Common Identification No. A-05-96-00013

TO: Jess McDonald, Director  
"Illinois Department of Children and Family Services  
406 East Monroe Street  
Springfield, Illinois 62701

This report provides you with the results of our review of the allocation of training costs claimed by the Illinois Department of Children and Family Services (State agency) under the Title IV-E Foster Care and Adoption Assistance programs. The audit objective was to determine whether the State agency properly allocated joint training costs between Title IV-E and other benefiting programs.

The State agency provides or contracts for various types of training for its employees, foster and adoptive parents, and other providers of foster care. Although this training also benefitted other State programs, the State agency charged the costs entirely to Title IV-E. As a result, the Department of Health and Human Services (HHS), Division of Cost Allocation (DCA), disapproved the State agency's cost allocation plan.

When we commenced our audit of Title IV-E training costs, the allocation of these costs was the subject of an appeal to the HHS Departmental Appeals Board (DAB). Because of the appeal, we excluded the allocation issue from our prior report on Title IV-E training costs (CIN: A-05-95-00022, dated February 29, 1996) which covered the other areas of our review. In its decision on the appeal issue, the DAB concluded that the joint training costs should be allocated to all benefiting programs. Based on the DAB's decision, we computed the overcharges to Title IV-E and are summarizing the results of our review in this separate report.

The State agency had not allocated joint training costs to all of the benefiting programs. We re-allocated these costs to all benefiting programs and determined that \$8,283,904 (Federal share - \$5,812,360) was improperly claimed during the period January 1, 1992 through December 31, 1994.

We are recommending that the State agency:

- make a financial adjustment of \$8,283,904 (Federal share \$5,812,360) to the Title IV-E program, and
- . develop and implement a cost allocation plan for distributing training costs to all benefiting programs.

In its written response to our draft report, the State agency concurred that an allocation factor, based on Title IV-E eligibility ratios, should be applied to joint training costs. However, it did not agree that the computed adjustment should be retroactive to January 1, 1992. The effective date that the costs were required to be allocated to all benefiting programs is the subject of an appeal between the State and the Administration for Children and Families (ACF). The State agency is working with DCA to obtain an approved cost allocation plan for distributing future training costs to all benefiting programs. The State agency's comments are included as an attachment to this report.

## **INTRODUCTION**

### **BACKGROUND**

In 1980, the Adoption Assistance and Child Welfare Act (Act), Public Law 96-272, established the Title IV-E program - Federal Payments for Foster Care and Adoption Assistance. Under Section 474 of the Act, States are entitled to Federal financial participation (FFP) to cover the cost of training State personnel to administer the Title IV-E program. Section 474 provides for Federal reimbursement at the enhanced rate of 75 percent for training expenditures.

The Title IV-E program is administered at the Federal level by the HHS/ACF. At the State level, the Illinois Department of Children and Family Services (State agency) is responsible for administering the Title IV-E program.

During the period January 1, 1992 through December 31, 1994, the State agency claimed Title IV-E training costs totaling approximately \$32.3 million (Federal share - \$24.3 million). The State agency submits quarterly claims to ACF for the reimbursement of Title IV-E training costs relating to foster care and adoption assistance. These claims also identify the case count of Title IV-E eligible children as well as the total of all children under the responsibility of the State agency. Each quarter the State agency uses these case counts to compute Title IV-E eligibility ratios expressed as percentages.

In our previous audit of Title IV-E training costs, we found that the State agency had claimed training costs that were ineligible for reasons unrelated to the allocation issues of the appeal. The allocability of joint training costs was deferred and excluded from that audit report pending the results of the DAB appeal.

### **SCOPE**

Our audit was conducted in accordance with generally accepted government auditing standards. This review was part of a nationwide audit of training activities conducted at State agencies administering Federal programs. The objective of our audit was to determine whether training costs were properly allocated between the Federal Title IV-E and the State's foster care and adoption programs.

Based on the State agency's appeal and the DAB's decision, our review focused on developing a methodology to properly allocate Title IV-E joint training costs. We adjusted our calculations to take into consideration the unallowable and unsupported costs reported in our prior audit report (CIN: A-05-95-00022) .

To accomplish our objective, "we reviewed Federal regulations, ACF program guidelines, and DAB decisions. We discussed the objective of our review with ACF and DCA regional officials to develop a mutually agreeable methodology for allocating costs to benefiting programs. We agreed to use the percentage ratio of Title IV-E eligible children to the total foster care and adoption cases included on the quarterly claims as the allocation basis for our calculations. We did not review the propriety of the State agency's computation of the Title IV-E eligibility percentages, nor did we consider the allocability and propriety of the training activities, topics, and course content. Our review was conducted at the State agency during the period December 1995 through May 1996.

### **RESULTS OF REVIEW**

The State agency did not allocate costs to all benefiting programs as required by Office of Management and Budget (OMB) Circular A-87 and ACF Policy Announcements. As a result, costs of \$8,283,904 (Federal share - \$5,812,360) were improperly claimed under the Title IV-E program during the period January 1, 1992 through December 31, 1994.

According to Attachment A, Section C.3.a of OMB Circular A-87, costs of goods or services are chargeable to a particular cost objective in accordance with relative benefits received. Furthermore, ACF issued three policy announcements (ACYF-PA-87-05; ACYF-PA-90-01; ACF-IM-91-15) dealing with the allocation of

foster care and adoption assistance costs. These announcements stated that training costs must be allocated among all benefiting programs.

In December 1994, the State agency filed an appeal with the DAB because DCA had formally disapproved their Title IV-E cost allocation plan relating to the allocation of training costs. The primary issues of the appeal dealt with the types of activities allowable as Title IV-E training and the allocation of joint training costs exclusively to the Title IV-E program. The State agency contended that costs determined to be directly related to the purpose of Title IV-E are allocable 100 percent to that program, regardless of whether there might be some incidental or collateral benefit to other programs. They argued that the allocation methodology which DCA sought to impose was inconsistent with the Act and applicable regulations, and was not required by ACF's policy guidelines.

To the contrary, the DAB decision dated August 3, 1995, stated that the State agency's position has no merit. The State agency acknowledged that its foster care training also benefits children who do not meet the Title IV-E eligibility requirements. The DAB concluded that joint training costs must be allocated to all benefiting programs and suggested the use of an eligibility ratio to allocate joint administrative costs among programs. Thus, each program is charged only its allocable costs based on benefits received.

We summarized the State agency's quarterly claims that were submitted to ACF for reimbursement of Title IV-E training costs. We adjusted these claims for the unallowable and unsupported costs disclosed in our prior audit. The remaining costs were allocated between the Title IV-E and other programs using the Title IV-E eligibility rates reported by the State agency on its quarterly claims. The results of our allocation are summarized as follows.

	<u>Adjusted Claims (1)</u>	<u>Title IV-E Ineligible costs</u>	<u>FFP Rate</u>	<u>Federal Share</u>
Foster Care	\$24,289,855	\$6,600,141	75%	\$4,950,106
Adoption Assistance	312,533 33,193	81,490 9,038	75% 50%	61,118 4,519
Non-Training (2)	<u>5,812,206</u>	<u>1,593,235</u>	50%	<u>796,617</u>
Total	<u>\$30,447,787</u>	<u>\$8,283,904</u>		<u>\$5,812,360</u>

- (1) To preclude a duplication of questioned costs, we have adjusted the training claims for the unallowable and unsupported costs disclosed in our prior audit.
- (2) Foster parent recruitment and indirect costs were claimed as training costs at 75 percent FFP. In our prior audit, we recommended a financial adjustment to reduce the claim from 75 percent to 50 percent FFP. The non-training costs claimed at 50 percent also needed to be allocated to all benefiting programs.

The overclaim resulted primarily from the State agency's incorrect interpretation of Federal regulations. The DAB decision makes clear that joint training costs must be allocated to all benefiting programs.

### **RECOMMENDATIONS**

We recommend the State agency:

- make a financial adjustment of \$8,283,904 (FFP \$5,812,360) to the Title IV-E program, and
- develop and implement a cost allocation plan for distributing training costs to all benefiting programs.

**STATE AGENCY COMMENTS.** In a written response dated June 11, 1996, the State agency concurred that, based on DAB Decision No-1530, an allocation factor should be applied to joint training costs to distribute them to all benefiting programs. It also concurred in our recommendation that it develop and implement a cost allocation plan for distributing future training costs. The State agency, however, did not agree that the financial adjustment should be retroactive to January 1, 1992, the beginning of our audit period, since DCA did not disapprove its Cost Allocation Plan until December 21, 1992. In addition, the State agency listed additional adjustments that should be considered in the calculation of the dollar amount of the recommended audit adjustment.

The State agency noted that the ACF has issued a disallowance letter, based primarily on the DAB Decision, for approximately \$12 million covering the extended period April 1, 1989 through June 30, 1995. The ACF disallowance, which also includes the joint training cost "allocation issue covered in this report, is being appealed based primarily on the State's disagreement over the effective date that the costs were required to be allocated to all benefiting programs.

In a subsequent letter dated June 24, 1996, the State agency provided a schedule showing its calculation of eligible and

ineligible training costs which they re-allocated based on the Title IV-E eligibility rates in effect during the audit period. The schedule determined that the Federal share of the recommended financial adjustment should be \$5,812,360 instead of the \$5,877,586 shown in our draft audit report. For a detailed breakout of the adjustment by quarter,- refer to the Schedule attached to the State agency's response.

**OAS RESPONSE.** Based on the additional information provided by the State agency, we agree that the proper adjustment should be \$5,812,360 and have changed the amounts in this final report to correspond with the State's calculations. Our report covers the audit period January 1, 1992 through December 31, 1994. The ACF disallowance letter extends the adjustment period retroactively to April 1, 1989. The State agency, in turn, contends that the earliest effective date of the adjustment should be December 21, 1992. The effective date is an issue that will be resolved in the State agency's appeal of ACF's disallowance letter. Although the State is appealing ACF's disallowance, the amount of the financial adjustment was determined based on the methodology prescribed in the DAB decision. For the periods subsequent to June 30, 1995, the State agency has been claiming joint training costs based on Title IV-E participation rates in accordance with the DAB decision. It is in the process of working with DCA to revise the cost allocation plan.

ATTACHMENT

STATE AGENCY'S RESPONSE  
TO DRAFT REPORT



STATE OF ILLINOIS

JESS McDONALD  
DIRECTOR

**DEPARTMENT OF  
CHILDREN AND FAMILY SERVICES**

406 EAST MONROE  
SPRINGFIELD, ILLINOIS 62701

217/785-2509  
217/524-3715 TDD/TTY

June 11, 1996

Common Identification No.: A-05-96-00013

Mr. Victor Schmitt, Senior Auditor  
HHS - OIG Office of Audit Services  
Illinois Business Center  
400 West Monroe, Suite 204B  
Springfield, Illinois 62704

Dear Mr. Schmitt:

We have reviewed the draft report of your review of our allocation of Title IV-E training costs dated March 1996 and provide the following comments. -

**ALLOCATION OF TRAINING COSTS**

The State agency had not allocated joint training costs to all of the benefiting programs.

Recommendation.

We are recommending that the State agency:

- make a financial adjustment of \$8,355,271 (Federal share \$5,877,586) to the Title IV-E program, and

Response.

In May 1996, the Department of Children and Family Services (DCFS) received a disallowance letter from the Administration for Children and Families (ACF) amounting to approximately \$12 million for the period April 1, 1989 through June 30, 1995. Included in this disallowance was the issue of applying an allocation factor to training costs. Therefore, this audit and the disallowance clearly overlap each other. The Department has appealed this disallowance and; therefore, our response to the audit is subject to our response to the disallowance.

Without prejudice to our legal rights, we concur that based on DAB number 1530, issued on August 3, 1995, an allocation factor should be applied to joint training costs. However, we do not agree with the dollar amount of this adjustment or that this adjustment should be retroactive, to January 1, 1992.

Illinois had submitted a proposed cost allocation plan (CAP) on January 24, 1989 which was

never approved or disapproved. Then, on May 12, 1992, Illinois submitted a revised, proposed CAP which DCA disapproved on December 21, 1992. Those proposed CAPS provided for a method of allocating training costs that conformed with statutes, the State Plan, all existing regulations, and prior decisions of the DAB. Until DCA actually disapproved Illinois' proposed CAP, DCA had discretion to approve Illinois' allocation method. DCA had not disapproved the State's allocation method, had not acted within the time period prescribed by its own rules, had not given the State clear notice that its method was **unacceptable**, and had not notified the State that it could not submit claims in accord with its proposed plan or that such claims would be disallowed. DCFS had continued to submit claims relying in good faith on its reasonable interpretation of the state regulations and pertinent facts. Therefore, HHS should not be permitted to seek adjustments for any period prior to August 3, 1995, when Decision 1530 was issued, or, at the earliest December 21, 1992.

Also, notwithstanding the issue of notice discussed in the previous paragraph, we would not agree with the dollar amount of the adjustment to be made for the following reasons:

1. Additional adjustments have been made in subsequent claims related to the training costs claimed during the audit period.
2. The current quarter's eligibility rates were inappropriately applied to prior quarter costs.
3. A \$60,013 negative prior quarter adjustment in the quarter ended June 30, 1993 claim was incorrectly shown as a positive adjustment.

Therefore, the federal share of the adjustment should have been calculated as \$5,794,586 instead of \$5,877,586 (see attachment).

#### Recommendation.

- develop and implement a cost allocation plan for distributing training costs to all benefiting programs.

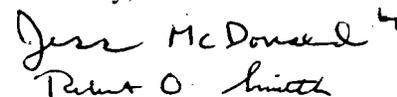
#### Response.

We concur. Illinois is in the process of working with DCA to obtain an approved CAP and will make additional amendments as necessary.

#### CONCLUSION

If you have questions or comments related to the matters presented, please contact Francis L. Kauzlarich at 217-785-2564.

Sincerely,



Jess McDonald, Director



STATE OF ILLINOIS

JESS McDONALD  
DIRECTOR

**DEPARTMENT OF  
CHILDREN AND FAMILY SERVICES**

406 EAST MONROE  
SPRINGFIELD, ILLINOIS 62701

217/785-2509  
217/524-3715 TDD/TTY

June 24, 1996

Common Identification No.: A-05-96-000 13

Mr. Victor Schmitt, Senior Auditor  
HHS - OIG Office of Audit Services  
Illinois Business Center  
400 West Monroe, Suite 204B  
Springfield, Illinois 62704

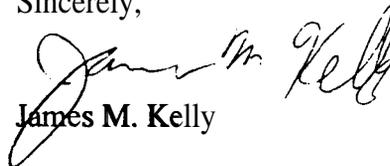
Dear Mr. Schmitt:

As per our conversation earlier today, I am attaching a revised schedule of allocation of training costs using Title IV-E eligibility rates for the January 1992- December 1994 period. The schedule in question had previously served as an attachment to the letter to you dated June 11, 1996. As with the original schedule, this revised schedule is being provided only to demonstrate that the Department does not agree with the dollar amount of adjustment calculated, notwithstanding the issues in the previous letter.

The main revision to the schedule was the removal of adjustments which related to training costs claimed during the audit period but that were adjusted in quarters after December 31, 1994. It should be noted that even though these subsequent adjustments are not reflected in the schedule, they would have an affect on the training adjustment.

If you have any questions, please call me at 785-2560.

Sincerely,

  
James M. Kelly

cc: Francis L. Kauzlarich  
Angela Long

Illinois Department of Children and Family Services

5/24/96

Allocation of Training Costs Using Title IV-E Eligibility Rates  
January 1992- December 1994

----- Prior Period Adjustments claimed from 01/01/92-12/31/94 -----

	06/30/90	09/30/90	12/31/90	03/31/91	06/30/91	09/30/91	12/31/91	03/31/92	06/30/92	09/30/92	12/31/92	03/31/93	06/30/93	09/30/93	12/31/93	03/31/94	06/30/94	09/30/94	12/31/94	
<b>Foster Care</b>																				
costs @75%	7,392.28	7,694.58	29,243.45	35,600.56	77,983.60	0.00	0.00	1,237,118.77	1,428,574.92	2,045,115.88	1,157,038.02	1,237,283.23	1,101,242.61	3,803,190.29	1,272,233.66	2,249,894.26	2,417,586.29	<b>4,794,333.85</b>	1,366,326.57	24,269,656.62
Eligibility Rate	77.760%	<b>77.314%</b>	77.310%	77.266%	76.975%	77.611%	% 76.917%	<b>79.908%</b>	82.430%	73.9s4%	73.040%	72.741%	71.823%	71.949%	72.311%	72.363%	70.333%	70.374%	71.541%	
Eligible Costs	5,746.24	5,946.99	22,606.11	27,514.5	60,027.56	0.00	0.00	966,558.87	1,177,574.31	1,513,263.04	<b>845,100.57</b>	900,012.19	790,945.46	2,736,357.36	919,964.66	1,628,640.56	1,700,360.97	<b>3,373,964.50</b>	993,224.14	
Ineligible Costs	<b>1,644.04</b>	1,745.59	6,635.34	6,085.60	17,955.72	0.00	0.00	248,581.90	251,040.61	531,652.54	311,937.45	337,271.04	310,297.13	<b>1,066,832.91</b>	352,266.78	621,353.30	717,225.32	1,420,369.35	395,104.43	
FFP @75%	1,233.03	1,309.19	4,976.50	<b>6,064.20</b>	13,458.79	0.00	0.00	1,554,214.3	186,250.46	396,669.63	233,953.09	252,953.28	232,722.65	600,124.68	264,201.58	466,014.97	537,916.99	<b>1,065,277.01</b>	296,326.32	4,950,106.01
<b>Costs @50%</b>																				
costs @50%	0.00	<b>0.00</b>	<b>0.00</b>	0.00	<b>0.00</b>	76,737.79	96,247.26	191,967.00	226,274.03	648,071.00	169,963.63	194,740.00	<b>185,450.00</b>	483,703.31	<b>609,566.00</b>	61,386.56	<b>896,333.00</b>	<b>1,234,539.30</b>	160,726.00	5,612,205.85
Eligibility Rate	77.760%	<b>77.314%</b>	77.310%	77.266%	76.975%	77.611%	% 76.917%	79.906%	82.430%	<b>73.994%</b>	73.040%	72.741%	71.823%	71.949%	<b>72.311%</b>	72.363%	70.333%	70.374%	71.541%	
Eligible Costs	<b>0.00</b>	0.00	0.00	0.00	0.00	61,266.66	75,955.45	153,395.59	186,166.26	479,533.66	124,156.04	141,655.62	133,195.75	346,019.69	440,763.27	444,334.31	630,417.69	668,794.69	129,294.62	
Ineligible Costs	0.00	0.00	0.00	<b>0.00</b>	0.00	17,471.13	<b>20,291.81</b>	36,570.01	40,107.74	168,537.34	45,827.59	53,064.16	52,254.25	135,683.62	168,782.73	169,531.25	265,915.11	365,744.61	51,433.38	
FFP @50%	<b>0.00</b>	0.00	0.00	<b>0.00</b>	0.00	6,735.56	10,145.90	19,285.00	20,053.67	64,266.67	22,913.79	25,542.09	26,127.12	67,641.61	64,391.36	64,765.63	132,957.56	162,672.31	25,716.69	71,617.37
<b>Adoption</b>																				
costs @75%	0.00	0.00	0.00	<b>0.00</b>	0.00	0.00	<b>0.00</b>	19,027.27	0.00	<b>0.00</b>	13,323.62	9,145.03	12,716.66	10,501.79	<b>53,311.99</b>	75,117.17	27,135.70	17,043.30	75,210.23	312,532.98
Eligibility Rate	56.340%	60.082%	60.430%	61.656%	62.359%	63.573%	64.766%	65.965%	<b>66.984%</b>	66.320%	69.521%	69.990%	70.639%	72.641%	73.633%	75.131%	73.255%	74.163%	76.914%	
Eligible Costs	0.00	0.00	<b>0.00</b>	<b>0.00</b>	0.00	0.00	<b>0.00</b>	12,555.14	0.00	<b>0.00</b>	9,262.65	<b>6,400.61</b>	<b>9,008.37</b>	7,649.61	<b>39,361.64</b>	58,436.28	19,878.26	12,643.23	57,647.20	
Ineligible Costs	0.00	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	0.00	0.00	6,472.13	<b>0.00</b>	0.00	4,060.97	2,744.42	3,708.31	2,652.18	13,950.15	16,660.69	7,257.44	4,400.07	17,363.03	
FFP @75%	0.00	0.00	0.00	0.00	<b>0.00</b>	0.00	0.00	4,654.09	<b>0.00</b>	<b>0.00</b>	3,045.73	2,056.32	2,761.23	2,139.14	10,462.61	14,010.67	5,443.06	3,300.05	13,022.26	61,117.19
<b>Costs @50%</b>																				
costs @50%	<b>0.00</b>	0.00	<b>0.00</b>	0.00	<b>0.00</b>	0.00	0.00	3,373.71	0.00	0.00	2,416.63	0.00	2,397.23	<b>0.00</b>	9,297.40	6,566.94	3,460.75	3,275.69	0.00	33,192.55
Eligibility Rate	58.340%	60.082%	60.430%	61.656%	62.359%	63.573%	64.766%	65.985%	66.984%	66.320%	69.521%	<b>69.990%</b>	69.993%	72.641%	73.633%	75.131%	73.255%	74.163%	76.914%	
Eligible Costs	0.03	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	2,226.14	0.00	<b>0.00</b>	1,661.46	0.00	1,677.82	0.00	6,364.55	6,736.45	2,535.17	2,430.55	0.00	
Ineligible Costs	0.00	<b>0.00</b>	0.00	0.00	0.00	0.00	0.00	<b>1,147.57</b>	0.00	0.00	737.17	<b>0.00</b>	719.41	<b>0.00</b>	2,432.65	2,230.49	925.56	645.74	0.00	
FFP @50%	0.00	<b>0.00</b>	0.00	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	0.00	573.76	<b>0.00</b>	0.00	368.59	0.00	359.70	0.00	1,216.43	1,115.24	462.79	422.67	0.00	4,519.40
<b>Total FFP</b>	1,233.03	1,309.19	4,976.50	6,064.20	13,466.79	6,735.56	10,145.90	211,134.31	206,304.33	463,156.30	260,281.19	281,553.68	261,990.91	870,105.62	360,271.99	<b>565,906.51</b>	676,762.42	1,251,872.24	335,067.29	5,612,359.96

"It should be noted that adjustments made in subsequent quarters to quarters in the audit period are NOT reflected in these figures.

Audit Finding 5,877,566.00  
Difference (65,226.02)