

STATE OF COLORADO

Office of the Child's Representative

1300 Broadway, Suite 320
Denver, Colorado 80203
Phone: (303) 860-1517
Fax: (303) 860-1735
www.coloradochildrep.org



Linda Weinerman
Executive Director

July 29, 2016

Stephanie Villafuerte
Office of the Child Protection Ombudsman
1300 Broadway, Suite 340
Denver, CO 80203

As a state agency, the Office of the Child's Representative works with case workers, supervisors and administrators in all sixty four counties in child welfare proceedings. Guardians ad litem, adoptive families and adoption advocates have continued to report a lack of consistency and transparency in the manner in which counties handle adoption assistance negotiations and agreements. This issue has been identified by the Ombudsman as an area of concern since the office began in 2010. Although the Ombudsman Office had previously identified the issue as one of two Special Projects in its 2013 report, the problems continue. I am requesting a formal investigation into this matter.

As you know, adoption is a permanency goal that is given preference in our statutory scheme as it provides permanency for the child and an ultimate resolution of a child welfare case where reunification with a parent is not possible. Families who are adopting a special needs child through the child welfare system are eligible for an adoption subsidy at a rate of no more than what the child would receive if he/she were in foster care (Social Security Act, section 473 (a)(3) (https://www.ssa.gov/OP_Home/ssact/title04/0473.htm)). The purpose of the adoption assistance program is to achieve permanency for special needs children by removing barriers to their adoption (Rule 7.306.44 B). The amount of the subsidy is determined through a negotiation between the adoptive parents and the County Department of Human Services considering the circumstances of the adopting parents and the needs of the child being adopted.

Unfortunately given our County administered child welfare system in Colorado there is no consistency in the manner in which adoption assistance negotiations occur or the rate of the subsidy offered, if any. The issues include: families being advised that they are not eligible for an adoption assistance subsidy prior to the negotiation occurring; families being provided with incorrect information during the adoption assistance negotiation; and subsidy rates that are widely disparate for children similarly situated. Most concerning is a sense both amongst advocates and families that a handful of Counties have intimated during the negotiation process that the family may not be the appropriate placement for the child where a family does not agree with the offered adoption assistance. Each of these issues is addressed below:

1. Inaccurate information provided to families concerning the negotiation process, eligibility for an adoption assistance agreement and the services covered by the agreement, including the following:

- a. Presentation of the child and conducting the subsidy negotiation on the same day which is clearly not consistent with Volume 7 Regulations. In one case in Otero County, the County conducted the subsidy negotiation in court, on the day of the adoption! The family, although in disagreement with the offer, agreed to the rate so that their child's adoption (16 yr. old) would not be postponed.
- b. Informing families that the adoption assistance agreement must be renewed every three years (the regulatory language is that the agreement must be **reviewed** every three years, and in the case of Title IV-e subsidies, cannot be changed without agreement of the parents).
- c. GALs and advocates report that in multiple cases, adoptive families are advised that the agreement does not include items such as day care/child care and respite, even though the rules specifically include these in the list of covered expenses eligible as case services that can be included in the agreement. Families in Arapahoe County continue to be told that day care cannot be included in agreements, despite clarification on this issue by the CDHS Adoption Administrator, and the required revision of their written adoption assistance policy to remove this language. Other counties stating this position to families include, but are probably not limited to, Adams, Jefferson, and Pueblo. For example, in a December 2015 letter to a pre-adoptive family during the adoption assistance negotiation process, Pueblo County DSS states, "Please be informed that day care costs can't be considered in negotiating adoption assistance," and in an April 2015 email to a pre-adoptive family, Adams County states, "We are unable to cover childcare expenses through adoption assistance or use case services money to reimburse for childcare expenses."

Some families have been inaccurately informed that other services included under Case Services (e.g., therapeutic services for children requiring specialized therapy) can also not be included as part of the assistance agreement.

Case services are referred to in a general manner in several of the county policies, but the policies do not document specifically what these services are.

- d. Counties erroneously informing families that adoption assistance can only be used to cover the special needs of a child, despite federal and state regulatory language, and a 2013 ALJ decision in SHS 2013-0373 (Christina Beck and John Beck v Arapahoe County Department of Human Services), which states that assistance agreements must include consideration of a child's ordinary needs and family circumstances.

In fact, Adams County forwards emails to pre-adoptive families, stating "If the time comes in the future for a renegotiation, the children's **special needs** are what are

taken into consideration for an increase in rate and **daily needs** will not be considered as reason for an increase in rate.”

- e. Families are informed prior to the adoption assistance negotiation that their child will not qualify for any adoption assistance other than Medicaid (dormant subsidy). Because these comments are made outside of the negotiation process – generally by the foster worker vs. the subsidy caseworker – they clearly do not take into account the needs of the child or circumstances of the family. In Larimer county as an example, the county forwards a form letter to the adoptive family with an “offer” for a dormant (Medicaid only) adoption assistance (see Attachment A). The family is advised they may accept or reject that offer. If the family rejects that offer, they are asked to complete an Initial Review Child/Family Questionnaire and provide documentation of the child’s needs. By initiating the process with no specific information about the special needs of the child and never advising the adoptive parents that the adoption assistance agreement involves a negotiation between the county and the family, the process does not appear to be conducted in good faith.
2. There is no consistency in adoption assistance rates: Some counties choose to “cap” the amount of the payment they will offer regardless of the needs of the child and circumstances of the adoptive family. This issue was identified as problematic eleven years ago in an ALJ decision in 2005, SHS 2005-0398 (Armstrong v Jefferson Department of Human Services). In that case, the county offered a subsidy equal to an arbitrarily established cap which was substantially below the foster care rate the family had received to address the children’s significant special needs. Although the ALJ found that the county may set a cap on subsidy rates under Section 7.306.42.F.2, the ALJ and the Office of Appeals in upholding the decision, referred concerns to the Colorado Department of Human Services. Those concerns included how the low subsidy amounts undercut the stated purpose of the Adoption Assistance program, which is to achieve permanency for special needs children by removing barriers to their adoption, and the impact of an arbitrary cap on the county’s ability to individually tailor adoption assistance agreements to the needs of the children. Because of the artificially capped rate imposed by Jefferson County in the above case, the children did not receive permanency because the family was not able to adopt the children (children remained with family in foster care).

Las Animas County recently requested that one of their foster families adopt a sibling group of four in their care (family also included one adopted child, and four birth children). The family felt strongly that the siblings needed to remain together, but they were very clear in discussions and meetings with the County that, based on family circumstances and the foster children’s needs, the adoption subsidies would have to be similar to the children’s foster care rates. Only after termination of parental rights did the County inform the family that the maximum subsidy rate was capped in their subsidy policy, and that there were *no circumstances in the written policy that would allow exceptions to the cap*; this would have resulted in a decrease from foster care to subsidy rates of approximately \$330/mo. for two children, and \$550/mo. for the other two siblings. After filing for a fair hearing, and subpoenaing the State Adoption Administrator, the County agreed to appropriate rates for the children, and the family is in the process of finalizing. In this case, the County *violated their*

own written adoption subsidy policy; if they had not, the family – despite being selected as the appropriate adoptive family for this sibling group of four – could not have adopted the children. This would have required additional costs to the county for locating an adoptive family(ies), additional move(s) for the children, and, given their behavioral and mental health issues, the probability of splitting the sibling group. In a recent case in Larimer County, a child with Keyairie Syndrome was receiving \$2400 per month in foster care support. The county offered \$200 per month as an adoption subsidy. Ultimately the family hired an attorney to represent them in the adoption assistance negotiation and reached a subsidy settlement of \$1000 per month, an amount less than 50% of the foster care rate the child had received.

Information on a County's specific adoption assistance policy is available online at <https://sites.google.com/a/state.co.us/cdhs-dcw/data-accountability/adoption-assistance-policy>. (see Attachment B) Currently, forty-two Counties provide information on their policies while twenty-two or roughly a third of Counties do not. Of the forty-two Counties who make this information available, eight do not artificially cap the adoption assistance rate. Amongst the thirty-four Counties that do set an artificial cap on the assistance rate, the rates vary widely. The cap in Logan County is \$900 per month while the cap in Grand-Jackson County is \$250 per month. It is difficult to understand how a special needs child in a rural county such as Grand County could receive a little more than a quarter of the adoption assistance per month compared to a similarly situated child in another rural County. Similarly, a family who adopts a special needs child in Denver may receive up to \$500 per month but should that family move across the County line to Arapahoe County, the maximum rate they could receive is only \$361 per month.

Equally concerning is the disparity amongst counties in the percentage of dormant adoption assistance agreements (Medicaid-only) compared to the number of adoption assistance agreements that include financial support. Attachment C charts the average monthly adoption assistance rate and the number of dormant only adoption assistance agreements by County from 2008 through 2014. The comparisons by County are striking. As an example, Mesa County provided adoption assistance agreements, including monthly subsidies, to all 37 families who adopted in SFY 2014 at an average cost of \$388 per month. The number of dormant adoption assistance agreements between 2008 and 2014 in Mesa County is consistently a small fraction of the total number of adoption assistance provided for special needs children, dropping to 0% in 2014. Conversely, Larimer County provided adoption assistance agreements that included monthly subsidies to only three of 33 families who adopted in 2014, at an average cost of \$9 per month. At the same time, the number of dormant agreements in Larimer County has steadily increased from 2011 to 2014 such that they comprise 91% of all adoption assistance agreements in 2014. . Clearly particular Counties have illustrated concerning trends in regards to subsidy rates and the percentage of dormant adoption assistance agreements. Counties such as Mesa, El Paso, Pueblo and Denver have historically had few dormant adoption assistance agreements compared to agreements that include financial support for special needs children. Counties such as Larimer, Arapahoe, Jefferson and Weld however have demonstrated a trend toward offering only dormant adoption assistance. This appears to be a reflection of County policy and not a reflection of the circumstances of the family and special needs of individual children.

3. Adoptive families are intentionally intimidated during the adoption assistance negotiation process. GALs in both Arapahoe and Denver have reported that adoptive families are actively discouraged from requesting any adoption assistance. GALs report that families have been overtly shamed for asking for financial assistance to adopt. In several instances, adoptive parents who do not agree on the offered adoption assistance are told they may not be the “right fit” for the child and efforts are made by the county to locate an alternative placement.

In a recent Larimer County case, a child was placed in a pre-adoptive home in May 2011; parental rights were terminated and all appeals completed more than two years later in August 2013. The pre-adoptive mother received subsidy paperwork in October 2013 identifying her as the adoptive parent for the child – diligent searches had been conducted on all possible kinship placements in the previous two years. Between October of 2013 (offer of a dormant subsidy, without any prior meeting or discussion with the parent) and June 2016, Larimer made four separate subsidy offers. The parent disagreed with the first two offers, and requested a fair hearing in December 2013. The County requested postponement of the first two scheduled fair hearings, a setting phone conference with the Administrative Judge in order to identify a third fair hearing date, and conducted a conference call with Appellant and Appellant’s advocate to discuss the assistance offers. During this entire 8-mo. period, the County never indicated any concerns about the child’s pre-adoptive placement; in fact, the Larimer County foster care recertification for the parent, completed 2/11/14, stated that: “... [child’s caseworker] and the treatment team are concerned that removing [child] from [pre-adoptive] home could result in irreparable damage to [child’s] ability to attach to another parent. The treatment team, and [pre-adoptive parent] believe that it would be detrimental to [child] to remove her from [pre-adoptive parent’s] home.” However, one week prior to the third fair hearing, scheduled for June 2014, and three years after placement of the child in the home, Larimer County informed the Administrative Law Judge that,

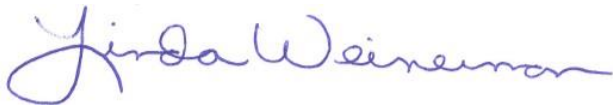
“The Larimer County Department of Human Services has not yet completed an assessment as to whether any family placement options remain for the child that is the subject of this adoption subsidy request. Until family placement/adoption options have been exhausted, the Larimer County Department of Human Services as Guardian/Custodian cannot consent to adoption of the child with the Appellant...”

Because of this action, the pre-adoptive parent was obligated to retain an attorney to fight for adoption of the child. After two years of hearings and discussions, the child’s adoption was finalized in June of this year.

Special needs children who come into the child welfare system and who cannot return to their families are absolutely the most vulnerable of Colorado’s citizens. The families who step forward to adopt these children need to be respected and supported during the adoption assistance negotiation process. At a minimum, families deserve to have a clear understanding of the process, an opportunity to negotiate in good faith based upon the needs of the child and their circumstances, and a written document detailing what costs may be included in the adoption agreement. Although Colorado is a County administered child welfare system, the significant differences in the manner in which Counties approach adoption agreements rises to the level of an equal protection issue for special needs children in Colorado.

I am happy to provide additional information to you as well as contact information for adoptive families, adoption advocates and guardians ad litem who can provide relevant information in specific cases. Thank you in advance for your help in addressing this systemic problem.

Sincerely,

A handwritten signature in blue ink that reads "Linda Weinerman". The signature is fluid and cursive, with the first name "Linda" being more prominent than the last name "Weinerman".

Linda Weinerman
Executive Director

ATTACHMENT A

DEPARTMENT OF HUMAN SERVICES

CHILDREN, YOUTH & FAMILY DIVISION

2555 Midpoint Drive, Suite F
Fort Collins, Colorado 80525
(970) 498-6900
Fax (970) 498-6966



October 27, 2014

Re: Adoption Assistance offer for [REDACTED]

Dear [REDACTED]

Your caseworker has informed me that your case is ready to proceed to adoption. The first step in this process is to put the Adoption Assistance (Subsidy) in place. A subsidy is intended to help reduce or remove financial barriers to the adoption of children with special needs. Subsidy funds are not intended to cover the routine expected costs associated with raising a child. The amount of a subsidy is based upon the original barriers to adoption, the special needs of the child, the circumstances of the adoptive parent(s), and the need to purchase services that are not available through Medicaid or in the community at low cost or free of charge while considering the financial situation of adoptive parent(s). Each subsidy is developed for a specific child with that child's special needs in mind. After review of the case, the Larimer County Department of Human Services would like to offer you all of the following in Adoption Assistance:

- A Dormant/Medicaid only subsidy that entitles your child to Medicaid health benefits through age 18. If, from age 18 to age 21, your child continues to live in Colorado, the Medicaid benefits can continue until their 21st birthday, at which time, the Medicaid benefit through the Adoption Assistance program will end.
- Reimbursement of out-of-pocket expenses that are directly related to the adoption of the child, up to a maximum of \$800.00 per child. Examples of such out-of-pocket expenses are the court fee to file the adoption petition, the fee associated with the new birth certificates). This reimbursement of up to \$800.00 will be provided after receipts are submitted to Department for such out-of-pocket expenses.

If you ACCEPT the Adoption Assistance that is offered above, please send me an email at pbondarust@larimer.org and indicate to me that you accept the offer listed above. We will then schedule a meeting to sign subsidy paperwork.

If you REJECT the Adoption Assistance offered above, please send me an email stating your intent to reject the above offered subsidy and reason for your rejection. I will also need you to complete the Initial Review Child/Family Questionnaire (attached) and return it to me along with the documentation listed on the form.

If you have any questions about this offer or the process, please do not hesitate to contact me, so that we can discuss this and make sure that you fully understand what is being offered and/or needed from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Pam Bonda Rust", is written over the word "Sincerely,".

Pam Bonda Rust
Adoption Subsidy Coordinator
Larimer County Department of Human Services
cc: Adoption Assistance file

ATTACHMENT A

Initial Review

Child/Family Questionnaire

Please fill out completely

Today's Date:	
Child's First Name:	Child's Last Name:
DOB:	Age:
School Name:	Child's Grade:
School Address:	School Phone #:
Physician Name:	Physician's Phone #:
Physician's Address:	Date First Seen:
Therapist Name:	Therapist's Phone #:
Therapist's Address:	Date First Seen:
Other:	Phone #:
Address:	Date First Seen:
Parent First Name:	Parent Last Name:
Physical Address:	
Mailing Address: (<input type="checkbox"/> Same as Physical)	
Parent First Name:	Parent Last Name:
Physical Address:	
Mailing Address: (<input type="checkbox"/> Same as Physical)	

The following supporting documentation must be submitted for all subsidy requests (subsidy review will not begin until all requested documentation is received) ;

- A release of information for all of the above named agencies/individuals must be provided to the Larimer Count Department of Human Services. The Department may contact any of the agencies listed above to obtain additional information.
- Educational records including IEP, 504 Plan, attendance records, grade reports, a statement from teachers or school counselor
- Mental Health or Psychological Evaluations that have been completed
- If your child is currently seeing a counselor or therapist; a current treatment plan documenting your child's diagnosis, progress reports, and documentation of goals and progress, including a summary of the child's participation and engagement in the service.
- If the subsidy request is for a child's medical condition please submit medical records, reports and evaluations
- A copy of your tax returns from the prior year
- A detailed budget of monthly income and expenses for your family including but not limited to; earned and unearned income, housing costs, food expenses, clothing, household items, dining out, utility bills, phone, auto expenses, gas, membership fees, credit card payments, vacation expenses, medical, children activities and school related expenses.

Please provide a detailed response to each of the following questions: (you may attach additional pages, if needed)

1. Describe your child's special needs.

2. Please describe what services are currently in place to meet these needs? What resources are you using to provide these services?

ATTACHMENT A

3. Are there additional services that you are unable to provide to your child at this time that are needed? What are the current barriers to accessing these services?
4. What community resources or Medicaid resources have you utilized to assist in meeting your child's special needs?
5. Please describe your child's academic successes, struggles, and their current status in school.
6. Please describe your child's current medical health (physical health). Is your child receiving any specialized treatment that is not currently covered under Medicaid or Private Insurance?
7. Has your child been diagnosed with a mental health disorder? Is your child currently prescribed medications to help treat or address the symptoms of their diagnosis? If so, what are they currently prescribed?
8. Please describe your child's peer relationships including a summary of their interpersonal skills, ability to communicate with others, and their ability to resolve conflict.
9. Is your child currently receiving therapeutic services (i.e. counseling or mental health therapy)? If so, please describe what goals are being addressed as part of this service. Is your child, participating and engaged in the service? What is the frequency in which these services are provided?
10. Please describe the out of pocket expenses you are currently expending for your child's special needs? Please be specific and you should not include funds used to meet the basic daily needs for your child (i.e., food, clothing, school expenses, housing, social or recreational activities).
11. Please provide any additional information that you would like to add regarding your child and their special needs or your family's circumstances.
12. Based on the information provided above, please provide a statement outlining your request for subsidy for your child. Please be specific regarding the dollar amount requested and how these funds would be utilized to meet your child's special needs.

ATTACHMENT B

Colorado Counties with Capped Subsidy Rates*

County	Capped Subsidy Rate?	Approx. Capped (Max) Rate/mo. (0-10 yrs.)	Exceptions to Capped Rate?
Archuleta			
Delta			
Elbert			
Fremont			
Garfield			
Lincoln			
Montrose			
Yuma			
Adams	y	\$371.00 (\$12.20/d)	y
Alamosa	y	\$349.20 (\$11.64/d)	y
Arapahoe	y	\$361.05 (\$11.87/d)	y
Boulder	y	\$380.00 (\$12.49/d)	y
Broomfield	y	\$369.00 (\$12.13/d)	?
Chaffee	y	\$348.87 (\$11.47/d)	?
Cheyenne	y	\$375.00 (\$12.50/d)	N
Denver	y	\$500.00	y
Douglas	y	\$354.05 (\$11.64/d)	?
Eagle	y	\$371.00 (\$12.38/d)	y
El Paso	y	\$370.00 (\$12.17/d)	y
Grand-Jackson	y	\$250.00	N
Gunnison-Hinsdale	y	State's basic foster care maintenance rate	y
Jefferson	y	\$349.00	N
Kit Carson	y	\$375.00 (\$12.50/d)	N
Lake	y	\$349.00	y
La Plata	y	\$359.22 (\$11.81/d)	N
Larimer	y	\$349.00	N
Las Animas	y	State/County certified foster care maintenance rate	N
Logan	y	\$900.00	
Mesa	y	½ foster care rate	y
Moffat	y	\$300.00	y
Montezuma	y	\$369.00	N
Morgan	y	\$349.20 (\$11.64/d)	y
Otero	y	\$400.00	N
Park	y	State foster care rate	y
Prowers	y	\$361.09 (\$11.87/d)	y
Pueblo	y	\$359.00	y
Sedgwick	y	\$354.30 (\$11.81/d)	N

ATTACHMENT B

Summit	y	\$500.00	N
Teller	y	\$380.-1000. (dependent upon level-of-care)	y
Weld	y	County Basic Maintenance Rate	N
Baca	NA		
Bent	NA		
Clear Creek	NA		
Conejos	NA		
Costilla	NA		
Crowley	NA		
Custer	NA		
Dolores	NA		
Gilpin	NA		
Huerfano	NA		
Kiowa	NA		
Mineral	NA		
Ouray	NA		
Phillips	NA		
Pitkin	NA		
Rio Blanco	NA		
Rio Grande	NA		
Routt	NA		
Saguache	NA		
San Juan	NA		
San Miguel	NA		
Washington	NA		

* - Based on electronic adoption assistance policies from CDHS website accessed on 06.24.16:
<https://sites.google.com/a/state.co.us/cdhs-dcw/data-accountability/adoption-assistance-policy>
County does NOT impose artificial cap on subsidy rate (families can negotiate adoption subsidy rate up to foster care rate child receiving in foster care, less \$20 respite reimbursement)
 NA – Not Available

ATTACHMENT B

County-Specific Exceptions to Capped Subsidy Rates

Adams

- Children determined to be sexual offenders and assessed to be at a high risk of reoffending
- Children who have had repeated adoption disruptions
- Children who have a history of repeated placement in residential treatment level of care
- Children who have had multiple placements in psychiatric care

Alamosa

Exceptions may be made at the discretion of the Director of Alamosa County Department of Social Services

Arapahoe

- Severely medically fragile
- Sexual offenders assessed to be at high risk for re-offending
- Previous adoption disruption or dissolution
- History of repeated placements in a residential or psychiatric treatment level of care

Boulder

Exceptions may be made at the discretion of the Director of Boulder County Department of Housing and Human Services

Broomfield

All needs above the maintenance rate must be clearly documented by a third party prior to adoption finalization.

Chaffee

The Department will not provide adoption assistance to a child that is greater than the amount that was paid for a child while in foster care or if he/she were in a county certified foster home in the case of no-pay kin.

Denver

Any amount paid above \$500 requires approval from the Director of the Family & Children's Division

Douglas

At the Department's discretion, an allowance may be applied for severe physically or developmentally disabled children. The allowance may not exceed \$250 and is in addition to the monthly adoption assistance payment.

Eagle

If the county department and the family agree that the above maximum allowable rate is not sufficient to meet all of the criteria for adoption assistance, the request for a higher amount can be taken to the director/administrator/team for approval of a rate higher than those listed above.

El Paso

- Children who have a permanent physical and/or mental disability resulting in complete incapacitation and total dependence for survival
- Children who are severely medically fragile...
- Children determined to be sexual offenders and assessed to be at a high risk for re-offending
- Children who have a history of repeated placements in residential treatment level of care
- Children who have had multiple placements in psychiatric care
- Children who have previous disrupted adoptions due to severe behavioral or emotional problems

ATTACHMENT B

Gunnison-Hinsdale

- Children who have a permanent physical and/or mental disability resulting in complete incapacitation and total dependence for survival
- Children who are severely medically fragile...
- Children determined to be sexual offenders and assessed to be at a high risk for re-offending
- Children who have a history of repeated placements in residential treatment level of care
- Children who have had multiple placements in psychiatric care
- Children who have previous disrupted adoptions due to severe behavioral or emotional problems

Lake

Examples include severe and profound mental retardation, pervasive developmental disorder, Autism, Aspergers [Asperger's?], Fragile X and medically fragile infants.

Mesa

In situations where the child has chronic and severe physical, emotional or developmental disabilities that are documented by a physician or other professional, a higher rate may be negotiated with the Department.

Moffat

There may be further review of specific expenses which could increase that amount [the capped rate of \$300/mo.]

Morgan

The Department will not provide a subsidy to a child that is greater than the amount paid for the child's foster care.

Park

A child will not receive more in Adoption Assistance than they received as a foster child.

Prowers

The Department will not provide a subsidy to a child that is greater than the amount paid for a child if he/she were in a county certified foster home.

Pueblo

"An additional subsidy allowance will be added for the adoption of sibling groups. This will be in the form of \$50.00 added to the subsidy of each sibling. Pueblo County Department of Social Services reserves the right to make exceptions to the adoption subsidy based on extreme special needs of a child at the discretion of the county director."

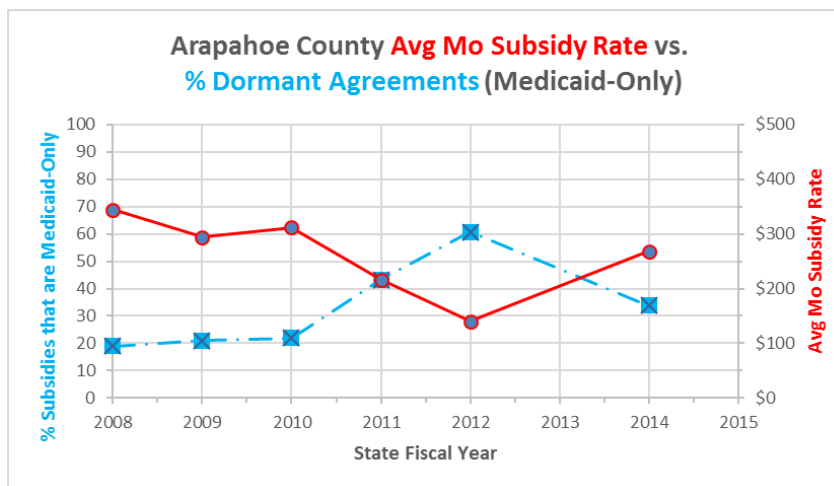
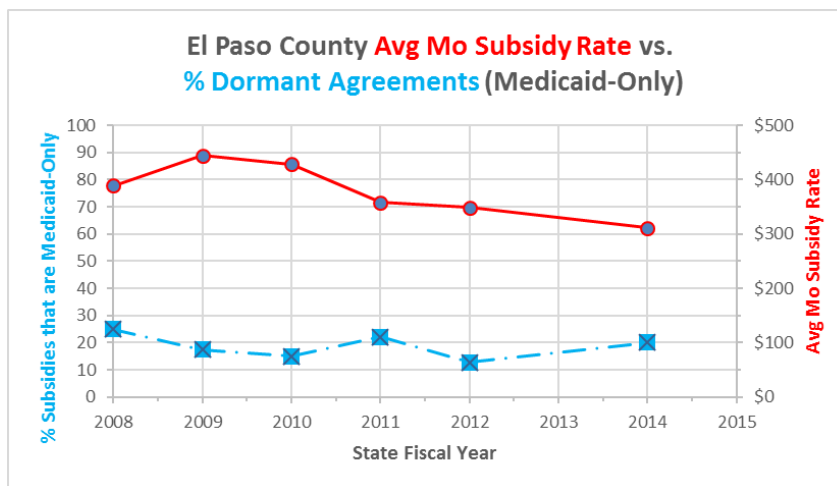
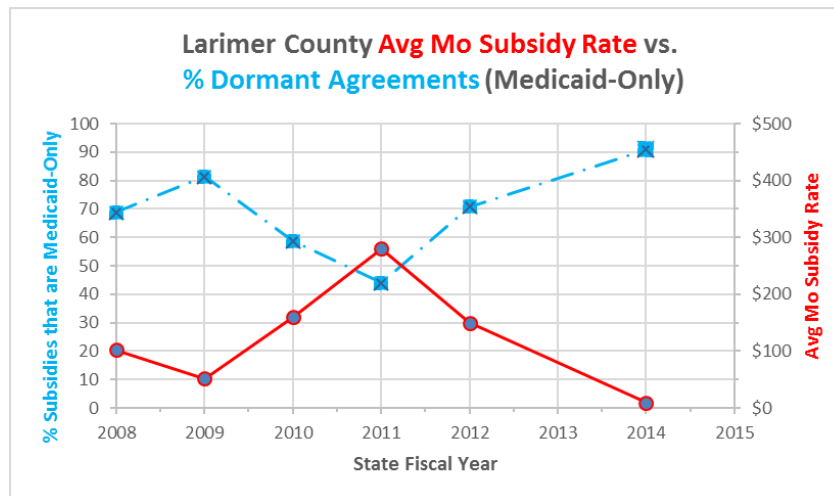
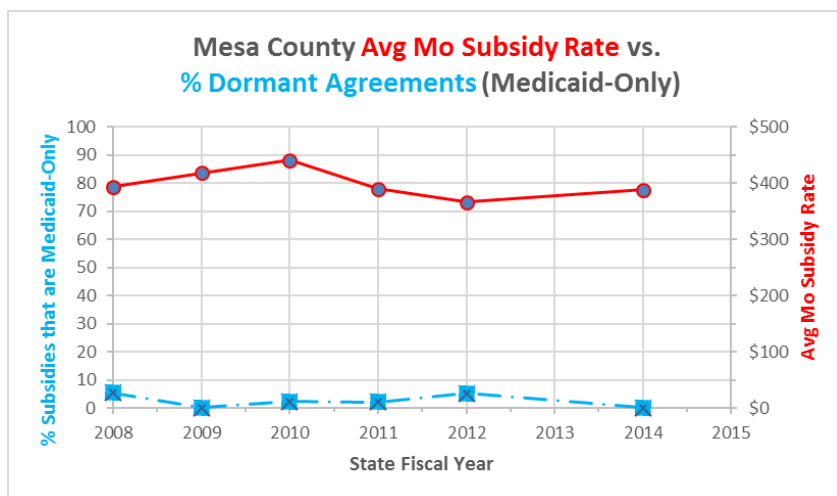
Teller

The subsidy rates listed above can be increased for children with medical needs, based on level of need of child.

An additional subsidy allowance will be added for the adoption of sibling groups. This will be in the form of \$50.00 added to the subsidy of each sibling.

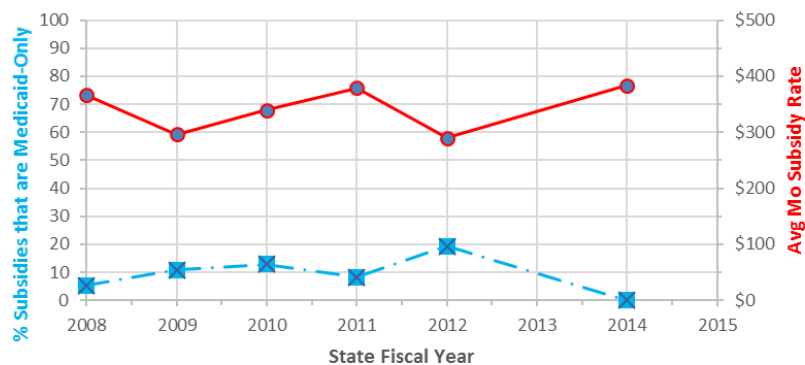
Teller County Department of Social Services reserves the right to make exceptions to the adoption subsidy based on extreme special needs of a child at the discretion of the county director.

ATTACHMENT C

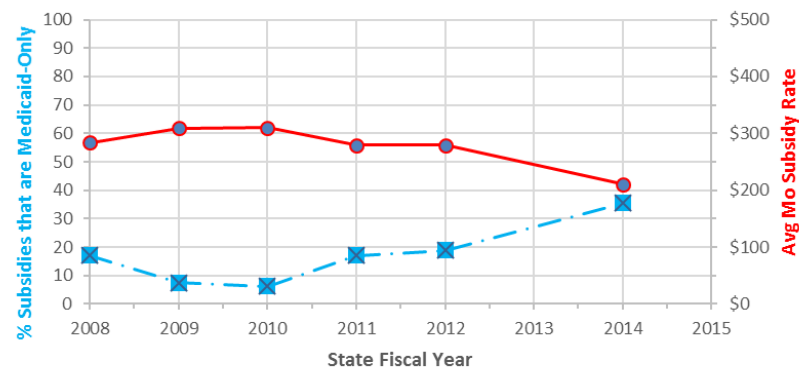


ATTACHMENT C

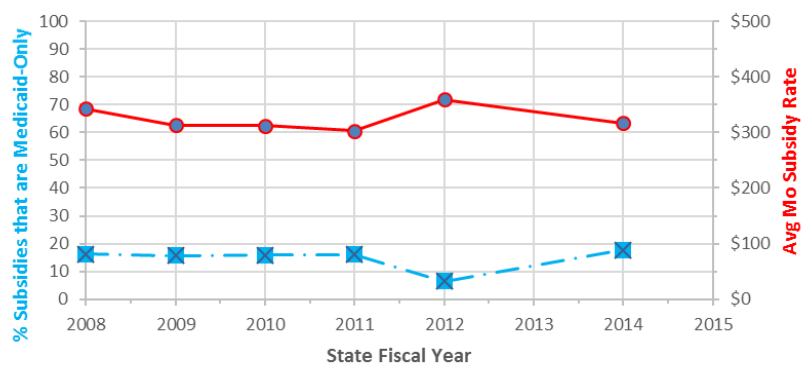
**Pueblo County Avg Mo Subsidy Rate vs.
% Dormant Agreements (Medicaid-Only)**



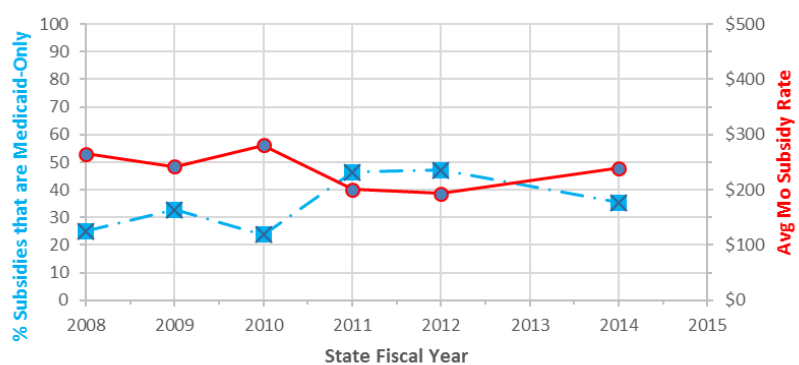
**Jefferson County Avg Mo Subsidy Rate vs.
% Dormant Agreements (Medicaid-Only)**



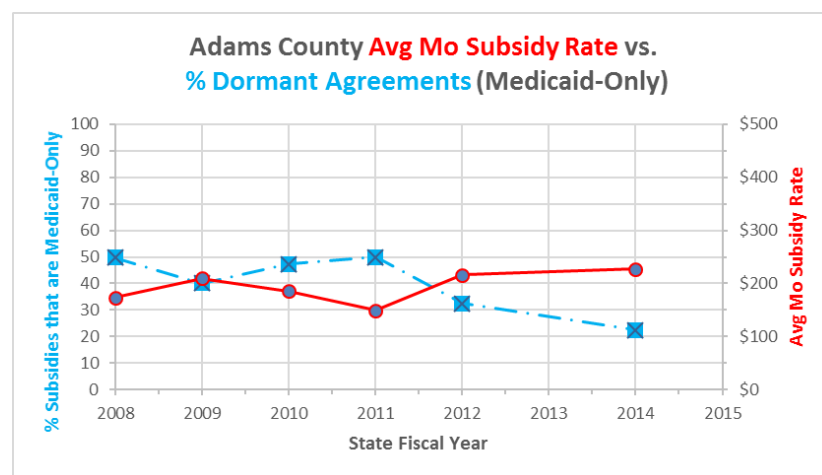
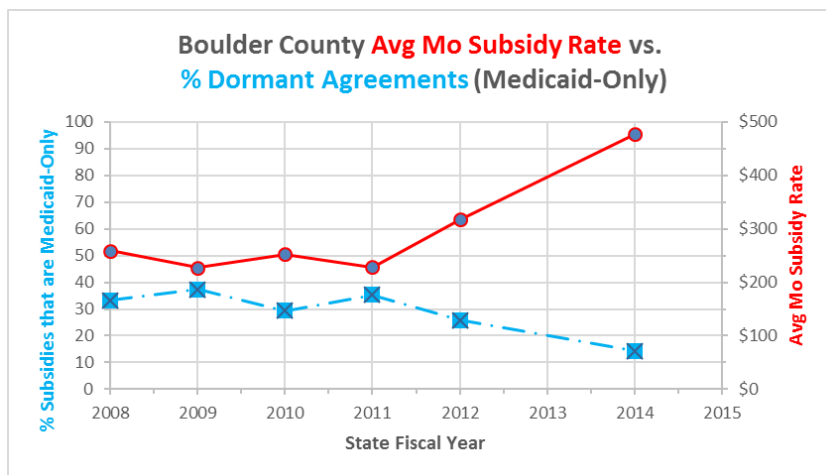
**Denver County Avg Mo Subsidy Rate vs.
% Dormant Agreements (Medicaid-Only)**



**Weld County Avg Mo Subsidy Rate vs.
% Dormant Agreements (Medicaid-Only)**



ATTACHMENT C



ATTACHMENT C

