

**Memorandum****MAY 13 1992**

Date

From

Richard P. Kusserow
Inspector General*Bryan Mitchell*
F012

Subject

Audit of Cash and Medical Assistance Under the Refugee
Resettlement Program in the State of Florida
(A-04-91-00010)

To

Jo Anne B. Barnhart
Assistant Secretary for
Children and Families

This is to alert you to the issuance on May 15, 1992, of our final report. A copy of the report is attached.

The primary objective of the review was to determine the appropriateness of cash assistance payments made by the Florida Department of Health and Rehabilitative Services (HRS) during the period February 1, 1988 through July 31, 1990. However, we also determined whether refugees received medical assistance after their eligibility had expired.

The HRS made cash and medical assistance payments to refugees who were not eligible for assistance. Federal regulations limit the period refugees are eligible for cash and medical assistance under the Refugee Resettlement program (RRP). Additionally, HRS provided assistance under the RRP to some recipients who were not refugees.

The HRS did not have edits in its computerized payment system to identify refugees whose eligibility period had expired. Instead, HRS relied on its local offices to identify the refugees' eligibility period and provide notification to stop assistance payments. These notifications were not always provided timely to HRS. As a result, \$488,362 was paid to ineligible refugees under the Refugee Cash Assistance program and \$199,769 was paid to ineligible refugees under the Aid to Families with Dependent Children program. In addition, these ineligible refugees received medical assistance of \$287,309 under the Refugee Medical Assistance program and \$136,910 under Medicaid.

We are recommending procedural changes to improve HRS' administration of the RRP. We are also recommending that HRS make financial adjustments of \$1,112,350 for the ineligible cash and medical assistance payments. The HRS

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agreed to make certain procedural changes. However, HRS believed that its new computer system would preclude the need for edits in the current system. Furthermore, HRS believed the overpayments should be reduced because sufficient time was not allowed to implement Federal policy changes. The HRS also stated that a tolerance rate for errors should be allowed that would further reduce the identified overpayment.

Neither regulation nor policies of the awarding agency provide for a grace period for implementation of changes or a tolerance rate for errors. The notification of changes to eligibility periods are sent to States in advance of the effective date. If HRS did not have sufficient time to implement a change, it should have notified the awarding agency. The HRS did not provide any evidence to show that it notified the awarding agency that changes to the eligibility periods could not be made timely.

For further information contact:
Emil A. Trefzger, Jr.
Regional Inspector General
for Audit Services, Region IV
FTS: 841-6229

Attachment

Department of Health and Human Services

**OFFICE OF
INSPECTOR GENERAL**

**AUDIT OF CASH AND MEDICAL
ASSISTANCE UNDER THE REFUGEE
SETTLEMENT PROGRAM IN THE STATE
OF FLORIDA**



**Richard P. Kusserow
INSPECTOR GENERAL**

A-04-91-00010



REGION IV
P.O. BOX 2047
ATLANTA, GEORGIA 30301

Common Identification Number
A-04-91-00010

Mr. Robert B. Williams
Secretary
Department of Health and Rehabilitative Services
1317 Winewood Boulevard
Tallahassee, Florida 32399-0700

Dear Secretary Williams:

This report provides you with the results of our audit of cash and medical assistance under the Refugee Resettlement program (RRP) in the State of Florida. The primary objective of our review was to determine the appropriateness of cash assistance payments made by the Florida Department of Health and Rehabilitative Services (HRS) during the period February 1, 1988 through July 31, 1990. However, we also determined whether refugees received medical assistance after their eligibility had expired.

The HRS made cash and medical assistance payments to refugees who were not eligible for assistance. Federal regulations limit the period refugees are eligible for cash and medical assistance under the RRP. Additionally, HRS provided assistance under the RRP to some recipients who were not refugees.

The HRS did not have edits in its computerized payment system to identify refugees whose eligibility period had expired. Instead, HRS relied on its local offices to identify the refugees' eligibility period and provide notification to stop assistance payments. These notifications were not always provided timely to HRS. As a result, \$488,362 was paid to ineligible refugees under the Refugee Cash Assistance program (RCA) and \$199,769 was paid to ineligible refugees under the Aid to Families with Dependent Children (AFDC) program. In addition, these ineligible refugees received medical assistance of \$287,309 under the Refugee Medical Assistance (RMA) program and \$136,910 under Medicaid.

We are recommending procedural changes to improve HRS' administration of the RRP. We are also recommending that HRS make financial adjustments of \$1,112,350 for the ineligible cash and medical assistance payments. The HRS agreed to make certain procedural changes. However, HRS believed that its new computer

system would preclude the need for edits in the current system. Furthermore, HRS believed the overpayments should be reduced because sufficient time was not allowed to implement Federal policy changes. The HRS also stated that a tolerance rate for errors should be allowed that would further reduce the identified overpayment. The complete text of the HRS response is included as Appendix A.

Background

The Refugee Act of 1980, Public Law 96-212, established the Office of Refugee Resettlement (ORR) and authorized cash and medical assistance to refugees residing in the United States. The ORR is a part of the Administration for Children and Families (ACF), formerly the Family Support Administration.

Under the RRP, ORR reimburses States for up to 100 percent of cash and medical assistance provided to refugees during the 36-month period beginning with the first month the refugee entered the United States. For refugees who are eligible for federally funded programs such as AFDC and Medicaid, ORR reimburse States for the nonfederal share of the costs of these programs. If the refugees were not eligible under existing Federal programs, assistance was provided under ORR's RCA and RMA programs, which reimburses 100 percent of the costs.

Effective April 1982, the Refugee Act was amended to reduce the period of eligibility under the RCA/RMA programs to the first 18 months that a refugee is in the United States. However, after the first 18 months refugees could seek continued assistance under an existing State or local general assistance program for which they were eligible. Since Florida did not have a State assistance program, refugees not eligible under a Federal assistance program like AFDC received assistance only during their first 18 months in the United States.

Effective March 1, 1986, the 36-month eligibility period was reduced to 31 months to implement the provisions of Public Law 99-177, the Balanced Budget and Emergency Deficit Control Act of 1985. Effective February 1, 1988, the 31-month maximum eligibility period was reduced to 24 months according to the provisions of Public Law 100-202, Continuing Resolution of Fiscal Year 1988. These reductions in eligibility period only affected those refugees eligible for Federal assistance programs like AFDC. Refugees eligible for RCA and RMA continued to receive assistance during their first 18 months in the United States.

Effective October 1, 1988, the 18-month time limitation was reduced to 12 months. This change only affected the RCA and RMA programs. Refugees eligible for Federal assistance programs continued to receive assistance during their first 24 months.

Effective January 1, 1990 Federal reimbursement to States for Federal assistance payments to refugees was reduced to 4 months to comply with funding limitations of the Department of Health and Human Services appropriation for Fiscal Year 1990 (H.R.3566). This funding limitation did not affect the RCA and RMA programs.

Scope

Our review was performed in accordance with generally accepted Government auditing standards. The objective of our review was to determine the appropriateness of cash assistance payments made by the (HRS). We also determined whether refugees received medical assistance after their eligibility had expired.

We limited consideration of the internal control structure and instead, performed substantive audit tests to determine the allowability of cash assistance paid to RRP recipients. Our review included RCA and AFDC cash assistance payments made to RRP recipients during the period February 1, 1988 through July 31, 1990. We identified 4,158 refugees who received \$5,112,361 in RCA, and 475 refugees who received \$717,389 in AFDC during this period. The payments we reviewed were made to refugees whose eligibility to participate in the program had expired.

To identify the universe of RRP cash assistance recipients after their period of eligibility had expired, we obtained a computer tape from the Florida State Auditor General, Division of Public Assistance Fraud (DPAF). The tape contained cash assistance payments to refugees during the period February 1, 1988 through July 31, 1990.

Because the DPAF tape did not contain the recipients' date of entry (DOE) into the country, we used the HRS Office of Economic Services' Assistance Payment System (APS) records to obtain recipients' DOE. We obtained a computer tape of the APS records for refugees who received cash assistance payments during the period February 1, 1988 through July 31, 1990.

Using the data contained in the APS computer tapes, we determined the cases in which payments occurred past the refugees' period of eligibility. We computed the period of eligibility for each case in the universe, using the DOE and the applicable Federal eligibility periods. We compared the date of each payment to the period of eligibility, and identified those payments made after the period of eligibility had expired.

Our review of medical assistance overpayments was limited to determining if recipients of ineligible cash assistance payments were also receiving medical assistance after their eligibility in

the RRP had expired. We provided the HRS Medicaid office with the names and dates the refugees became ineligible for RRP assistance. The HRS Medicaid office gave us the medical assistance paid after the recipients' eligibility period. We verified the validity of the medical payments with judgmental tests of information contained in the HRS files.

Our review was conducted primarily at the HRS offices in Tallahassee and Miami, Florida. Our audit work was conducted during the period February 1991 through June 1991. On December 9, 1991, an exit conference was held with HRS officials to discuss the draft report.

RESULTS OF AUDIT

The HRS provided cash and medical assistance to refugees after their period of eligibility expired. These payments were not detected because the HRS did not have adequate edits to identify the expiration of the eligibility periods. There were also instances where the recipient was not a refugee.

We identified 928 refugees who potentially received \$542,119 in refugee cash assistance after their period of eligibility had expired, and 138 AFDC eligible refugees who potentially received \$103,196 in cash assistance after their period of eligibility had expired. To verify the validity of the potentially ineligible payments, we compared the DOE in the computerized files to the DOE in the recipient's case folder. In addition, we identified 1,587 recipients of RCA and 213 recipients of AFDC cash assistance with no DOE in the computerized APS. After obtaining the DOE from HRS for 1,290 of the 1,587 recipients of RCA and 162 of the 213 recipients of AFDC cash assistance, we identified the ineligible payments received by these refugees. The HRS did not provide us with DOEs for the remaining 297 recipients of RCA and the 51 recipients of AFDC cash assistance.

Our validation disclosed several instances where the ineligible payments had been intercepted by HRS and cancelled before being issued to the recipients. Since the cancellation information was available in the DPAF tape, we used this tape to eliminate the potentially ineligible payments which had been subsequently cancelled. After eliminating the cancelled payments and identifying additional ineligible payments, we determined that cash and medical assistance of \$1,112,350 was improperly charged to the RRP.

We are recommending that the \$1,112,350 be refunded to the RRP and that HRS make procedural changes to improve the administration of the refugee program.

REFUGEE CASH AND MEDICAL ASSISTANCE

The HRS made cash assistance payments and provided medical assistance to 759 recipients who were not eligible for RCA because they were not refugees, they should have been funded by the AFDC program or their period of eligibility had expired. Effective April 1, 1982 Federal regulations established a period of eligibility for RCA and RMA of 18 months. Effective October 1, 1988, the period of eligibility was reduced to 12 months.

Our review disclosed that the RCA paid to these ineligible recipients was \$488,362. The \$488,362 includes \$484,548 paid to recipients during our audit period of February 1, 1988 to July 31, 1990. The remaining \$3,814 of the \$488,362 represents improper payments some recipients received subsequent to our audit period. The refugees whose eligibility for cash assistance expired also received \$287,309 in RMA after their eligibility period.

AFDC CASH ASSISTANCE AND MEDICAID

The HRS claimed reimbursement from ORR for the nonfederal share of AFDC and Medicaid payments provided to 250 refugees who were not eligible under the RRP because they were not refugees, they should have been funded by the RCA program or their period of eligibility had expired. The period of eligibility established by Federal regulations for refugees eligible for cash and medical assistance from AFDC and Medicaid was 36 months from the DOE into the country. This period was reduced to 31 months in March 1988, to 24 months in February 1988, and finally, to 4 months effective January 1, 1990.

The HRS claimed reimbursement for \$199,769 in AFDC payments (nonfederal share) made to recipients who were ineligible for assistance under the RRP. The \$199,769 includes \$172,333 paid to recipients during our audit period of February 1, 1988 to July 31, 1990. The remaining \$27,436 of the \$199,769 represents improper payments some recipients received prior to or subsequent to our audit period. The HRS also claimed \$136,910 in reimbursements from ORR for medical assistance provided to refugees whose eligibility period under the RRP had expired.

The RCA and AFDC cash assistance payments to ineligible refugees occurred because HRS did not have edits in its computerized payment system to identify refugees whose eligibility period expired. Instead, HRS relied on its local offices to identify refugees' eligibility period and provide notification that payments should be discontinued. However, this procedure was not reliable as the local offices were not notified timely by HRS when the refugees' eligibility period was changed by Federal

regulations. Furthermore, local offices did not always take timely action to notify HRS that refugees should be removed from the RRP.

In summary, \$1,112,350 in cash and medical assistance payments were ineligible under the RRP because the payments were made after the refugees' periods of eligibility had expired.

Recommendations

We recommend that HRS:

- Establish procedures to insure that future changes in the eligibility period are implemented timely.
- Ensure that workers at the local offices understand the importance of timely action regarding the removal of ineligible RRP recipients.
- Implement an edit in the computerized payment system to delete recipients from the RRP when their eligibility expires.
- Make a financial adjustment of \$1,112,350 for cash and medical assistance for the ineligible refugees.
- Determine the date of entry for the remaining 297 RCA and 51 AFDC recipients with no DOE in the computerized payment system. Identify ineligible cash and medical assistance for these refugees and make appropriate financial adjustments.

State Agency Comments

The HRS comments to the report are summarized as follows and are in the same sequence as our recommendations.

- The HRS concurred, in part, to establish procedures to ensure that changes in eligibility periods are implemented timely. However, HRS believed time should be allowed to accomplish tasks inherent to Federal policy changes. The HRS felt that States should be given 90 days from notification of a policy change to implement the revised policy.

- The HRS proposed actions to ensure workers at the local offices understand the importance of timely action regarding the removal of ineligible recipients from payment files.
- The HRS did not agree to implement an edit in its computerized payment system to delete recipients from the files when their eligibility expired. The HRS believed that a new computer system, scheduled for full implementation by April 1, 1992, would provide sufficient alert to caseworkers of cases nearing the last month of eligibility. The alert could not be cleared until the condition was resolved.
- The HRS did not concur with our recommendation to make a financial adjustment of \$1,112,350. The HRS contended that not enough time was allowed by HHS to implement policy changes and that a tolerance rate needed to be established as exists for other programs. The HRS believed that a 90-day period should be given to implement the changes followed by a "held harmless from error" period of a minimum of 2 months. Payments made to recipients after their eligibility had expired during these periods were identified by HRS and subtracted from the \$1,112,350. The HRS also disagreed that payments which were outside the original audit period should be refunded. In total, HRS proposed reductions of \$301,379 in the recommended audit disallowance. The HRS did not identify the related medical costs, but stated that analogous reductions should be made to the same cases identified during the two grace periods requested.
- The HRS concurred that the date of entry should be provided for the cases. The HRS disagreed with the number of cases the draft audit report identified as not having a date of entry.

OIG Response

Our response addresses each comment by HRS in the same order as above.

- A 90-day grace period for implementation of changes is not provided by regulations or by policies of the awarding agency. The notification of changes to eligibility periods are sent to States in advance of the effective date. If HRS did not have sufficient time to implement a change, it should have notified the

awarding agency at that time. The HRS did not provide any evidence to show that it notified the awarding agency that changes to the eligibility periods could not be made timely.

- The actions proposed by HRS appear to be adequate.
- Until the new computer system described by HRS is fully implemented, we can not evaluate its effectiveness.
- The refugee program does not provide a 90-day grace period or a 2-month "held harmless from error" period. Therefore, we do not agree that the amount recommended for financial adjustment should be revised. Regarding amounts we identified outside the audit period, HRS did not give an explanation of why the amounts should not be refunded. These payments were associated with the same recipients identified in our review. Because the recipient received the ineligible payments before or after the time frames specified as the audit period does not relieve HRS from its responsibility for making payments to eligible recipients. Likewise, HRS is not relieved from its liability when ineligible payments are made.
- The draft report was revised to change the number of cases without a date of entry. The RCA cases were revised from 333 to 297 and the AFDC cases from 54 to 51.

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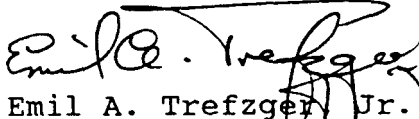
We request that you respond to the below named HHS action official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

In accordance with the principles of the Freedom of Information Act (Public Law 90-23), the Office of Inspector General, Office of Audit Services reports 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.

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If you have any questions, please contact John Drake of my staff at (404) 331-2446. To facilitate identification, please refer to the above Common Identification Number in all correspondence relating to this report.

Sincerely yours,



Emil A. Trefzger Jr.
Regional Inspector General
for Audit Services, Region IV

Direct Reply to:

Director, Florida Office ORR
P.O. Box 140188
Coral Gables, Florida 33114

cc:

Mr. Charles L. Lester
Auditor General
State of Florida
P.O. Box 1735
Tallahassee, Florida 32302



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

December 19, 1991

Mr. Emil A. Trefzger, Jr.
Regional Inspector General
for Audit Services
Region IV
P. O. Box 2047
Atlanta, Georgia 30301

Common Identification No. A-04-91-00010

Dear Mr. Trefzger:

Attached are our responses to the preliminary and tentative findings and recommendations made in the draft audit report of the Refugee Cash and Medical Assistance program in the State of Florida. Comments are provided for each recommendation. These responses have been prepared within the extension period provided in your October 17, 1991 letter to Nancy Wittenberg of my staff.

The exit conference should be scheduled with Nancy Wittenberg, Refugee Programs Administrator for HRS. She can be reached at (904) 488-3791. If I may be of further assistance, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Robert Williams', written over the typed name and title.

Robert Williams
Secretary

STATE OF FLORIDA
Department of Health and Rehabilitative Services
Responses to Recommendations in the HHS
Refugee Cash and Medical Assistance Program Audit Report

Audit Period
February 1, 1988 through July 31, 1990

HHS Recommendation #1: Establish procedures to ensure future changes in the eligibility period are implemented timely.

HRS Response #1: We concur, in part. Policy changes relative to the Refugee Assistance Program (RAP) are processed in the policy development section for Aid to Families with Dependent Children (AFDC), RAP and AFDC-related Medicaid. The bureau chief administering these programs personally tracks all assignments of this nature. Overdue lists are periodically generated and status reports required for overdue assignments. This process has the components necessary to ensure timely completion of future policy changes. However, even this process will be unsuccessful if sufficient time is not provided for the state agency to react to policy changes. Time must be allowed to accomplish the various tasks inherent to federal policy changes. These tasks include but are certainly not limited to:

- o reviewing and analyzing the federal regulations;
- o researching and identifying changes to the Florida Statutes;
- o developing the new or revised policy and rules;
- o preparing implementation instructions and training material if necessary;
- o identifying necessary system changes;
- o completing system reprogramming and acceptance testing;
- o identify cases affected by the change, printing and distributing the manual changes; and
- o provide training to line staff.

Therefore, given the administrative tasks involved with even the simplest policy change, states should be given a minimum of 90 days from notification of a policy change to implement the new or revised policy. It is impossible to successfully accomplish mandated changes without a grace period. Less time unnecessarily burdens the state with inadequate preparation and implementation time.

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Page 2

A 90 day grace period is not an arbitrary or capricious figure. This time frame is based on our experience with the policy implementation in the AFDC program. In fact, for policy changes in the AFDC program it is the exception and not the rule that time periods of less than three months are provided to accomplish changes in federal policy.

HHS Recommendation #2: Ensure that workers at the local offices understand the importance of timely action regarding the removal of ineligible RAP recipients.

HHS Response #2: We concur. To assist the Public Assistance Specialist (PAS) at a local level in understanding the importance of timely action, including the removal of ineligible RAP recipients, we propose a trifold action:

- o to provide the experienced PAS with a fact sheet/instructional guide. This form will reiterate information both on how to complete the FLORIDA alerts which are tied to time limited benefits, and explain the consequences the state faces for non compliance;
- o to ensure that this information is included and stressed in the pre-service training packages which are currently being developed at headquarters to train new staff; and
- o to expand the step in the current operational monitoring plan which addresses issues related to the termination of time limited benefits. Technical assistance and RAP case monitoring, by appropriate headquarters staff will continue to focus on unit specific procedures for ensuring that timely actions, relative to terminations, are carried out. The on-site technical visits will be expanded to include a meeting involving line staff and will specifically address this issue. Local commentary on how to improve procedures to better serve the clients will be welcomed, taken into consideration and passed on to the appropriate local level authorities.

HHS Recommendation #3: Implement an edit in the computerized payment system to delete recipients from RAP when their eligibility expires.

HRS Response #3: We do not concur. The State of Florida is currently in the process of implementing a new state of the art, integrated computer system known as FLORIDA (Florida On-line Recipient Integrated Data Access). This system allows application and eligibility determinations for multiple programs including AFDC, RAP, Medicaid (both family and adult related) and Food Stamps. The eligibility process is conducted within a single interview by the same public assistance specialist (PAS).

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To accomplish this task, each specialist has a terminal for on line access. FLORIDA is currently fully operational in five of the state's 11 districts. Full implementation is currently scheduled for April 1, 1992.

In this system, case management is accomplished, in part, by preset electronic messages to individual case workers, called alerts. Alerts are prioritized by the system and notify a user of required action, new case information, or changes in policy. Additionally, alerts are generated to advise staff that a case is approaching its last month of time limited benefits. These alerts are case specific and are tied to the worker of the case. Alerts are set up in advance of an anticipated date of change and appear on the PAS' screen several weeks prior to the date the action is to be effective. Alerts cannot be cleared off the system unless the condition causing the alert has been resolved. Alerts not acted upon in a timely manner are forwarded to the Public Assistance Supervisor's screen for appropriate remediation.

This process will, given time, aid in reducing the problem of untimely actions. It is our intent, however, to monitor this system closely. If we find that actions are not being processed timely under the new environment, we will re-address the issue. However, it seems premature to assume that this system will not resolve the issue at hand.

HHS Recommendation #4: Make a financial adjustment of \$1,112,152 for cash and medical assistance for the ineligible refugees.

HRS Response #4: We do not concur. It is our contention that:

- A) not enough lag time is allowed by HHS for the state to implement policy changes in a timely and accurate manners;
- B) a tolerance rate needs to be formulated as exists for other programs.

In regards to issue "A" above:

1) There is no grace period allowed for such implementation; for example, an HHS change received in HRS on 9/11/91 entitled "Refugee Program CMA Policy and Funding in FY 1992" was required to be implemented by 10/1/91, allowing scant time for review and analysis, interpretation, FLORIDA system and manual changes, development of implementation instructions, training of staff, reprogramming of the system, identification of cases affected and client notification when appropriate, and the requesting of ad hoc reports.

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2) Following a change in federal policy, no provisions are allowed in the RAP program to provide for a moratorium on errors. A moratorium is a reasonable period of time for which the state is held harmless for errors associated with a recent change in federal policy. This is, however, an accepted practice provided for both, the AFDC and Food Stamp programs.

While there is not a standard moratorium on errors when new policy is promulgated, states can request a moratorium based on circumstances which might prevent them from implementing new policy. Additionally, Quality Control (QC) has the option of establishing "modified QC procedures" to give states time to address typical error rates which may occur as a result of implementation of a regulation. Examples of this are the Declaration of Citizenship requirements, monthly reporting procedures and unemployed parent regulations. The initial monthly reporting regulations which were implemented in FFY 1985 yet were not counted as a QC payment error until FFY 1986. A twelve month moratorium was allowed for the unemployed parent regulations. The initial twelve month moratorium for the Declaration of Citizenship has been replaced by modified reporting procedures which continue to block fiscal liability. The length of a moratorium appears to vary depending on the complexity and difficulties associated with operationalizing the federal policy changes.

Based on the above information, we recommend that a minimum of three full months following receipt of policy changes be allowed for implementation, followed by a minimum of two months "held harmless from error" period. Expectation of full and accurate implementation in a lesser time frame is arbitrary and unreasonable.

A review of our records indicates that had the state been allowed a reasonable time for implementation as set forth in the above guidelines, our potential overpayment of \$1,112,152 would have been reduced by \$248,085. Thirteen percent of \$153,329 of three full months from the date of the policy change to implement the revised policy. An additional \$94,756 or 8.5% could have been avoided if an appropriate moratorium were provided.

Additionally, we disagree that a financial adjustment should be made for any cases found to be ineligible outside the audit time period. Cases cited outside the audit period account for cash payments of \$40,117 for AFDC and ineligible medical assistance of \$136,910. Furthermore, RCA cases cited outside the audit period resulted in a charge to the state of \$13,177 cash payments and \$287,309 in medical assistance. Total adjustments for cash payments outside the audit period are \$53,294.

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The following figures depict a more realistic account of the state's true fiscal liability as a result of the subject audit. No adjustments to the Medicaid overpayment are cited as we were unable to separately identify the medical expenditures for cases outside the audit period.

Ineligible Payments

RCA (CASH)	AFDC (CASH)
488,362 (1)	199,571 (1)
<u>-13,177</u> (2)	<u>-40,117</u> (2)
475,185	159,454
<u>-84,527</u> (3)	<u>-68,802</u> (3)
390,658	90,652
<u>-66,857</u> (4)	<u>-27,899</u> (4)
323,801 (5)	62,753 (5)

- (1) Represents the department's liability for cash overpayments as stated in the Draft Audit Report of the Refugee Program.
- (2) Represents cash overpayments discovered for the time frames outside the audit period. This figure should be removed from the stated fiscal liability since it occurred outside the 2/1/88 - 7/31/90 audit period.
- (3) Represents cash overpayments which occurred during the three month grace period. As stated earlier, this grace period is necessary in order to provide adequate implementation time. (see Attachment I)
- (4) Represents cash overpayments which occurred during a two month moratorium period which should follow mandatory policy changes of the nature cited in this audit period. (see Attachment I)
- (5) Thus, the department's overall fiscal liability of \$687,933 for cash payments is reduced by \$301,379. Adjustments to Medicaid expenditures could not be separately identified due to the quality of the Medicaid expenditures printout. However, analogous reductions to the Medicaid expenditures should be made for cases cited during the grace and moratorium period as well as those cases cited outside the audit period.

In regard to issue "B" above:

In the RAP program, no tolerance rate has been established by HHS as exists in other programs, such as AFDC, Medicaid and food stamps. Repayment is expected on every case with no margin for error allowed as is standard practice elsewhere. In addition, implementation and completion procedures seem to vary from year to year rather than follow a standardized pattern.

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The RAP program should follow the same type of implementation and quality control procedures which are currently used in the related AFDC program. A tolerance level for error rate should be established, and the states should not be held accountable for payment errors falling below that tolerance level. In addition, ongoing monitoring using or closely mirroring AFDC quality control procedures should be established using a valid sampling methodology. Deviation from this procedure should not take place except as provided for in standardized guidelines.

Had this been the case and the recent audit conducted according to sound monitoring practices and a tolerance level established and applied, the state would have been alerted at an earlier date to potential problems. This would have enabled HRS to correct these problems thus lowering the number of errors and funds "overissued". In addition, the state would have been held harmless for cases which fell under the established tolerance level.

HHS Recommendation #5: Determine the date of entry (DOE) for the remaining 333 RCA 54 AFDC recipients with no DOE in the computerized payment system. Identify ineligible cash and medical assistance for these refugees and make appropriate financial adjustments.

HRS Response #5: While we concur that the date of entry must be provided for all requested cases, we disagree with the number of cases reported as still outstanding. Our research indicated that significantly fewer cases are outstanding than reported in the audit findings. Our largest district office reports working directly with the federal auditor to provide requested dates of entry for a multitude of cases. These transactions were accomplished without headquarters record keeping, as such we are unable to definitively ascertain which 333 RCA cases and 54 AFDC cases of the original 1806 cases appear to be outstanding. We have requested a list from the auditors identifying the above referenced cases. As soon as this list is received, action will be taken to obtain any dates of entry still outstanding.

12-Dec-91 XMONTH

AFDC REFUGEE PROGRAM
 31 TO 24 MONTH POLICY

ENTRY DATE	31 MONTHS		24 MONTHS		GRACE PERIOD		MORATORIUM PERIOD	
	DATE	MONTHS	DATE	MONTHS	DATE	MONTHS	DATE	MONTHS
AUG 85	FEB 88	JAN 88	FEB 88	JAN 88	FEB 88	JAN 88	FEB 88	JAN 88
SEP 85	MAR 88	JAN 88	MAR 88	JAN 88	MAR 88	JAN 88	MAR 88	JAN 88
OCT 85	APR 88	JAN 88	APR 88	JAN 88	APR 88	JAN 88	APR 88	JAN 88
NOV 85	MAY 88	JAN 88	MAY 88	JAN 88	MAY 88	JAN 88	MAY 88	JAN 88
DEC 85	JUN 88	JAN 88	JUN 88	JAN 88	JUN 88	JAN 88	JUN 88	JAN 88
JAN 86	JUL 88	JAN 88	JUL 88	JAN 88	JUL 88	JAN 88	JUL 88	JAN 88
FEB 86	AUG 88	FEB 88	AUG 88	FEB 88	AUG 88	FEB 88	AUG 88	FEB 88
MAR 86	SEP 88	MAR 88	SEP 88	MAR 88	SEP 88	MAR 88	SEP 88	MAR 88
APR 86	OCT 88	APR 88	OCT 88	APR 88	OCT 88	APR 88	OCT 88	APR 88
MAY 86	NOV 88	MAY 88	NOV 88	MAY 88	NOV 88	MAY 88	NOV 88	MAY 88

XXXXXX
 XXXXXX
 XXXXXX

16-Dec-91 TIMELIMIT

Special Refugee Report

Costs Associated with Insufficient Lead Time for Policy Changes

3. General Assistance-Refugee Eligibility Period from 18 months to 12 months effective 10-1-90

Family Number	Name	Entry Date	Grace Period		Moratorium		Total
			Oct 88	wov 88	Dec 88	Jan a9	
172856001	*	6/87	275.00				275.00
172856501		6/87	156.00				156.00
172857801		6/87	156.00				156.00
172857901		6/87	275.00				275.00
172858101		6/87	156.00				156.00
172858501		6/87	156.00				156.00
172858701		6/87	275.00				275.00
172859001		6/87	211.00				211.00
172859301		6/87	156.00				156.00
172859401		6/87	211.00				211.00
172860001		6/87	211.00				211.00
172860101		6/87	87.00				87.00
172860401		6/87	211.00				211.00
172860801		6/87	156.00				156.00
172861001		6/87	211.00				211.00
172861301		6/87	156.00				156.00
172861501		7/87	324.00	324.00			648.00
172861601		6/87	211.00				211.00
172362001		7/87	156.00	156.00			312.00
172362701		7/87	211.00	211.00			422.00
172862901		6/87	211.00				211.00
172863201		7/87	156.00	156.00			312.00
172863701		6/87	156.00				156.00
172863801		7/87	211.00	211.00			422.00
172864301		6/87	156.00				156.00
172864501		6/87	211.00				211.00
172864601		7/87	156.00	156.00			312.00
172864701		7/87	156.00	156.00			312.00
172864901		6/87	156.00				156.00
1722865201		6/87	211.00				211.00
172865501		7/87	156.00	156.00			312.00
172865801		6/87	156.00				156.00
172865901		6/87	156.00				156.00
172366001		7/87	156.30	156.00			312.00
172866101		7/87	324.00	324.00			as. 00
na66201		7/87	275.00	275.00			550.00
172866301		7/87	211.00	211.00			422.00
172866401		7/87	156.00	156.00			312.00
172866601		6/87	156.00				156.00
172866801		6/87	156.00				156.00
na67001		7/87	211.00	211.00			422.00
172867301		6/87	156.00				156.00
172867401		6/87	324.00				324.00
172867501		7/87	156.00				156.00
172868001		7/87	156.00	156.00			312.00
172868501		7/87	156.00	156.00			312.00
172868601		7/87	156.00	156.00			312.00
172968801		8/87	156.00	156.00	156.00		468.00
172869001		6/87	156.00				156.00

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16-Dec-91 TIMELIMIT

Special Refugee Report

Costs Associated with Insufficient Lead Time for Policy Changes

172869101.	*	7/87	156.00				156.00
172869601		8/87	324.00	324.00	324.00		972.00
172869801		6/87	156.00				156.00
172870001		6/87	156.00				156.00
172870101		7/87	156.00	156.00			312.00
172870401		8/87	211.00	211.00	211.00		633.00
172870501		8/87	211.00	211.00	211.00		633.00
172870601		9/87	156.00	156.00	156.00	163.00	631.00
172870701		8/87	156.00				156.00
172870801		8/87	156.00	156.00	156.00		468.00
172871001		9/87	156.00	156.10	156.00	163.00	631.00
172871201~		7/87	156.00	156.00			312.00
172871~01		7/87	156.00	156.00			312.00
172871701		9/87	324.00	324.00	324.00	338.00	1,310.00
372871801		8/87	156.00	156.00	156.00		468.00
172872101		8/87	211.00	211.00	211.00		633.00
172872301		9/87	211.00	211.00		220.00	642.00
172872601		9/87	211.00	211.00	211.00	220.00	853.00
172872701		8/87	156.00	156.00	156.00		468.00
172873501		9/87	211.00	211.00	211.00	220.00	853.00
172875101		8/87	156.00	156.00	156.00		468.00
172874301		9/87	324.00	324.00	324.00	338.00	1,310.00
172875201		9/87	156.00	156.00	156.00	163.00	631.00
172875301		9/87	324.00	324.00	324.00	338.00	1,310.00
172875401		9/87	275.00	275.00	275.00	287.00	1,112.00
172875701		7/87	211.00	211.00			422.00
172875801		7/87	156.00	156.00			312.00
172875901		7/87	156.00	156.00			312.00
172876001		9/87	156.00	156.00	156.00	163.00	631.00
172876301		10/87	156.00	156.00	156.00	163.00	631.00
172876801		6/87	211.00				211.00
172877101		9/87	275.00	275.00	275.00	287.00	1,112.00
172877601		10/87	156.00	156.00	156.00		468.00
172877901		6/87	156.00				156.00
172878001		9/87	156.00	156.00	156.00	163.00	631.00
172878101		9/87	211.00	211.00	211.00	220.00	853.00
172878201		9/87	156.00	156.00	156.00	163.00	631.00
172878301		10/87	156.00	156.00	156.00	163.00	631.00
172878401		9/87	375.00	375.00	375.00	391.00	1,516.00
172878601		9/87	156.00	156.00	156.00	163.00	631.00
172878801		10/87	156.00	156.00	156.00		468.00
172879001		10/87	156.00	156.00	156.00		468.00
172879101		10/87	275.00	275.00	275.00	287.00	1,112.00
172879301		10/87	275.00	275.00	275.00	287.00	1,112.00
172880101		7/87	275.00	275.00			550.00
172880301		9/87	156.00	156.00	156.00	163.00	631.00
172880601		9/87	156.00	156.00	156.00	163.00	631.00
172880801		10/87	275.00	275.00	275.00	287.00	1,112.00
172881001		10/87	156.00	156.00	156.00	163.00	631.00
172881201		9/87	211.00	211.00	211.00	220.00	an.00
172881301		10/87	156.00	156.00	156.00	163.00	631.00
172881801		9/87	156.00	156.00	156.00	163.00	631.00
172881901		9/87	211.00	211.00	211.00	220.00	853.00
172882201		11/87		211.00	211.00	220.00	642.00

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special Refugee Report

Costs Associated with Insufficient Lead Time for Policy Changes

172882301	*	11/87	156.00	156.00	163.00	475.00
172882501		11/87	211.00	211.00	220.00	642.00
172882601		11/87	156.00	156.00	163.00	475.00
172882801		11/87	156.00	156.00	163.00	475.00
172883001		7/87	211.00	211.00		422.00
172883301		9/87	275.00	275.00	275.00	287.00
172883401		10/87	156.00	156.00	156.00	163.00
172883501		9/87	156.00	156.00	156.00	163.00
172883701		11/87		211.00	211.00	220.00
172883801		7/87	156.00	156.00		312.00
172883901		11/87		156.00	156.00	163.00
172884001		11/87		156.00	156.00	163.30
172884401		12/87			211.00	220.00
172884501		8/87	156.00	156.00	156.00	163.00
172884701		11/87		156.00	156.00	163.00
172884901		9/87	156.00	156.00	156.00	163.00
172885001		12/87			275.00	287.00
172885101		11/87		18.00	18.00	27.00
172885601		9/87	156.00	156.00	156.00	163.00
172885701		10/87	211.00	211.00	211.00	220.00
172885801		9/87	211.00	211.00	211.00	220.00
172886101		1/88				163.00
172886201		1/88				163.00
172886301		1/88				163.00
172887001		1/88				220.00
172887201		12/87			211.00	220.00
172887301		1/88				163.00
172887601		12/87			211.00	220.00
172887701		7/87	275.00	275.00		550.00
172887801		11/87		156.00	156.00	163.00
172888001		8/87	156.00	156.00	156.00	163.00
172888301		1/88				163.00
172888401		7/87	156.00	156.00		312.00
172888501		1/88				163.00
172888601		1/88				163.00
172888701		12/87			156.00	163.00
172888901		7/87	156.00	156.00		312.00
172889001		1/88				163.00
172889201		12/87			156.00	163.00
172889301		8/87	156.00	156.00	156.00	163.00
172889801		12/87			324.00	338.00
na90301		9/87	156.00	156.00	156.00	163.00
172890401		9/87	275.00	275.00	275.00	287.00
in890501		1/88				220.00
172891901		12/87			156.00	163.00
in892001		9/87	156.00	156.00	156.00	163.00
172892901		1/88				163.00
172893301		1/88				220.00
172893501		8/87	211.00	211.00	211.00	220.00
172893601		7/87	87.00	87.00		174.00
172893701		10/87	275.00	275.00	275.00	287.00
172894101		7/87	324.00	324.00		648.00
172894401		6/87	275.00			275.00
172894701		11/87		211.00	211.00	220.00

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Special Refugee Report

Costs Associated With Insufficient Lead Time for Policy Changes

172894801	12/87			275.00	287.00	562.00
172895801	9/87	156.00	156.00	156.00	163.00	631.00
172901301	12/87			156.00	163.00	319.00
172902301	11/87		156.00	156.00	163.00	475.00
172903101	12/87			156.00	163.00	319.00
172903301	12/87			156.00	163.00	319.00
172903501	7/87	156.00	156.00			312.00
172904701	9/87	211.00	211.00	211.00	220.00	853.00
172906101	10/87	156.00	156.00	156.00	163.00	631.00
172906401	9/87	211.00	211.00	211.00	220.00	853.00
172908001	11/87		156.00	156.00	163.00	475.00
172910501	12/87			156.00	163.00	319.00
172910701	11/87		156.00	156.00	163.00	475.00
172913001	10/87	156.00	156.00	156.00	163.00	631.00
172913401	1/88				163.00	163.00
172916801	12/87			156.00	163.00	319.00
172918201	10/87		156.00	156.00	163.00	475.00
220214101	7/87	274.00	274.00			548.00
220214201	7/87	156.00	156.00			312.00
220214501	9/87	156.00	156.00	156.00	163.00	631.00
220214601	9/87	156.00	156.00	156.00	163.00	631.00
220214701	8/87	211.00	211.00	156.00		578.00
220214901	8/87	211.00	211.00	211.00		633.00
220215201	9/87	275.00	275.00	275.00	273.00	1,098.00
220215301	9/87	156.00	156.00	156.00	163.00	631.00
220215501	9/87	156.00	156.00			312.00
220216801	8/87		211.00	211.00		422.00
220217401	9/87	156.00	156.00	156.00		468.00
225488801	6/87	156.00				156.00
225491401	7/87	324.00	324.00			648.00
225492201	6/87	156.00				156.00
225492701	8/87	156.00	156.00			312.00
225492801	8/87	275.00	275.00	275.00	287.00	1,112.00
225493001	8/87	156.00	156.00	156.00	163.00	631.00
225493101	8/87	156.00	156.00	156.00	163.00	631.00
225493201	9/87	156.00	156.00			312.00
225493401	9/87	324.00				324.00
225493601	9/87	156.30				156.00
225494001	9/87	156.30	156.00	156.00	163.00	631.00
225494201	8/87	375.00	375.00	375.00		1,125.00
225494301	7/87	211.00	211.00			422.00
225494601	9/87	156.00	156.00	156.00	163.00	631.00
225494701	9/87	211.00	211.00	211.00	220.00	853.00
226041301	6/87	156.00				156.00
226483601	8/87	423.00	423.00	423.00		1,269.00
226483801	8/87	211.00	211.00	211.00		633.00
226484101	9/87	156.00	156.00			312.00
226486201	9/87	156.00	156.00	156.00	163.00	631.00
226486701	9/87	156.00	156.00	156.00	163.00	631.00
226486901	9/87	211.00	211.00	211.00	220.00	853.00
226490801	1/88				163.00	163.00
227922001	7/87	156.00	156.00			312.00
227929101	9/87	156.00	156.00	156.00	163.00	631.00
227929301	10/87	375.30	375.00	375.00	391.00	1,516.00

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16-Dec-91 TIMELIMIT

special Refugee Report

Costs Associated with Insufficient Lead Time for Policy Changes

229565801	*	6/87	156.00					156.00
229568901		8/87	156.00	156.00	156.00			468.00
229569401		8/87	156.00	156.00	156.00			468.00
229569501		8/87	156.00	156.00	156.00			468.00
229569601		8/87	156.00	156.00	156.00			468.00
229598301		12/87			156.00			156.00
229689701		9/87	273.00	274.00				547.00
229980101		8/87	156.00	156.00	156.00			468.00
229983601		9/87	423.00	423.00	423.00	442.00		1,711.00
229992601		9/87	156.00	156.00	156.00	163.00		631.00
230000001		9/87	324.00	275.00	275.00	287.00		1,161.00
230014701		8/87	467.00	467.00	467.00			1,401.00
230260701		8/87	156.00	156.00	156.00			468.00
230261801		9/87	156.00	156.00	156.00	163.00		631.00
230257301		9/87	444.00	424.00	484.00	505.00		1,917.00
230268601		9/87	156.00	156.00	156.00	163.00		631.00
230268701		9/87	275.00	324.00	324.00	338.00		1,261.00
230270101		9/87	467.00	467.00	467.00	488.00		1,889.00
230270201		9/87	375.00	375.00	375.00	391.00		1,516.00
230270701		9/87	324.00					324.00
230271301		9/87	156.00	156.00	156.00	163.00		631.00
230271401		9/87	156.00	156.00	156.00	163.00		631.00
230272701		9/87	156.00	156.00	156.00	163.00		631.00
230277601		9/87	156.00	156.30	156.00	163.00		631.00
231577601		9/87	156.00	156.00	156.00	163.00		631.00
231577701		9/87	156.00	156.00	156.00	163.00		631.00
231578101		9/87	156.00	156.00				312.00
233578201		9/87	156.00	156.00	156.00	163.00		631.00
231578301		9/87	156.00	156.00	156.00	163.00		631.00
231578601		9/87	324.00	324.00	324.00	338.00		1,310.00
231579701		11/87		275.00	275.00	287.00		837.00
231581301		1/88				391.00		391.00
231580401		1/88				391.00		391.00
231581301		1/88				287.00		287.00
231581601		1/88				163.00		163.00
231581701		9/87	324.00	324.00	324.00	338.00		1,310.00
231581901		1/88				220.00		220.00
231582101		1/88				163.00		163.00
231582401		1/88				220.00		220.00
231582901		1/88				163.00		163.00
231584001		12/ a7			275.00	287.00		562.00
231584801		1/88				163.00		163.00
231855801		9/87	156.00	156.00	156.00	163.00		631.00
231857501		7/87	156.00	156.00				312.00
231857601		7/87	156.00	156.00				312.00
231859601		7/87	423.00	423.00				846.00
231986001		9/87	70.00	70.00	70.00	86.00		296.00
231986301		7/87	211.00	211.00				422.00
231989301		9/87	156.00	156.00				312.00
232475701		6/87	156.00					156.00
232553501		8/87	275.00					275.00
232797801		8/87	156.00	156.00				312.00
233008301		7/87	467.00	467.00				934.00
234663301		10/87	156.00	156.00	156.00	163.00		631.00

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.16-Dec-91 TIMELIMIT

Special Refugee Report

Costs Associated with Insufficient Lead Time for Policy Changes

Case Number	Date	Cost 1	Cost 2	Cost 3	Cost 4	Cost 5
235799001	11/87		156.00	156.00	163.00	Us. 00
236337701	11/87		156.00			156.00
237321001	9/87	156.00	156.00	156.00	163.00	631.00
237321101	9/87	156.00	156.00	156.00	163.00	631.00
237323401	9/87	423.00	423.00	423.00		1,269.00
237327001	11/87		156.00	156.00	163.00	475.00
237470401	11/87		275.00	275.00	287.00	837.00
238997201	9/87	156.00	156.00	156.00	163.00	631.00
241209901	12/87			323.00	337.00	660.00
241326401	1/88				163.00	163.00
251335101	9/87	156.00	156.00	156.00	163.00	631.00
241336101	12/87			35.00	338.00	373.00
241585901	9/87	156.00	156.00	156.00	163.00	631.00
242845401	12/87			156.00	163.00	319.00
242865601	12/87			156.00	163.00	319.00
243673401	9/87	156.00	156.00	156.00	163.00	631.00
243779701	9/87	156.00	156.00	156.00	163.00	631.00
247124001	9/87	156.00	156.00			312.00
247343701	9/87	156.00	156.00	156.00	163.00	631.00
249277701	7/87	156.00	156.00			312.00
249880801	8/87	156.00	156.00			312.00
249880901	8/87	156.00	156.00			312.00
249883401	11/87		211.00	211.00	220.00	at. 00
302069701	1/88				163.00	163.00
304103001	9/87	156.00	156.00	156.00	287.00	755.00
304106901	1/88				163.00	163.00
304795701	9/87	156.00		156.00	163.00	475.00
305472701	8/87			156.00		156.00
307600401	9/87	156.00	156.00	156.00	163.00	631.00
310782101	1/88				163.00	163.00
310783901	12/87			156.00	163.00	319.00
311285901	1/88				163.00	163.00
330328002	1/88				338.00	338.00

Total Dollars	44,768.00	39,759.00	33,023.00	33,834.00	151,384.00
Client Count	298		66,857		

84,527

66,857

* Individual's names have been deleted from this response -in accordance with the provisions of the Privacy Act.

16-Dec-91 TIMELIMIT

special Refugee Report
Costs Associated with Insufficient Lead Time for Policy Changes

2. AFOC-Refugee Eligibility Period from 24 months to 4 months effective 1-1-90

Family Number	Name	Entry Date	Grace Period		Moratorium		Total
			Jan 90	Feb 90	Mar 90	Apr 90	
231582301	*	2/88	225.00				225.00
231586201		4/88	294.00	294.00	294.00		882.00
231587501		4/88	22s.00	22s.00			450.00
240597501		3/88	400.00	400.00			800.00
249887901		3/89	167.00	167.00			334.00
249889601		2/89	247.00	247.00			494.00
300673401		9/88	225.00				22s.00
302065401		5/88	167.00	225.00			392.00
302066501		6/88	294.00	294.00	294.00	294.00	1,176.00
302069301		2/88	22s.00				225.00
304100301		6/88	225.00				22s.00
304101401		5/88	225.00	225.00	225.00	22s.00	900.00
304103901		7/88		22s.00			225.00
304105701		6/88	105.00	45.00			150.00
304108501		6/88	29.00	29.00			58.00
304-09901		5/88	294.00	294.00			588.00
306259301		9/88	225.00	225.00			450.00
306268901		9/88	22s.00	225.00			450.00
307411301		9/88	225.00				225.00
307600601		4/88	274.00	274.00			548.00
307605301		7/88	225.00	225.00			450.00
307609601		9/88	225.00	225.00			450.00
307880401		8/88	225.00	225.00			450.00
307882301		6/88	225.00	225.00	22s.00	22s.00	900.00
307883601		9/88	225.00	225.00			450.00
307884001		6/88	225.00	225.00			450.00
307885001		7/88	294.00	294.00	294.00		882.00
307885101		9/88	225.00	225.00			450.00
307885501		9/88	155.00	22s.00			380.00
307888401		9/88	160.00				160.00
307889701		9/88	225.00	225.00			450.00
308675201		11/88	167.00	167.30			334.30
310581501		9/88	294.00				294.00
310583201		9/88	22s.00	225.00			450.00
310585201		9/88	225.00	225.00			450.00
310585801		9/88	294.00	294.00			588.00
310586601		9/88	346.00	346.00	346.00		1,038.00
310781601		9/88	294.00				294.00
310783701		9/88	225.00	225.00	225.00		675.00
310784701		7/88	167.00	167.00			334.00
310785601		5/88	225.00	225.00			450.00
310786401		m a	225.00				225.00
310786601		6/88	22s.10	225.00	225.00	225.00	900.00
310786901		9/88	22s.00	22s.00			450.00
310787801		11/88	225.00	225.00	225.00		675.00
310788101		9/88	225.00	225.00	225.00		675.00
310788401		9/88	225.00	225.00	225.00		675.00

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Special Refugee Report

Costs Associated with Insufficient Lead Time for Policy Changes

311295801	*	12/88	280.00					280.00
311644601		3/89	225.00	225.00				450.00
312190901		1 1/88	167.00	167.00	167.00			501.00
312191301		11/88	294.00	294.00				588.00
312191601		12/88	225.00					225.00
312191701		6/88	225.00	225.00				450.00
312192001		9/88	346.00					346.00
312192601		5/88	244.00					244.00
312192801		11/88	225.00	225.00	225.00			675.00
312192901		7/88	167.00	167.00	167.00	167.00		668.00
312193101		11/88	225.00					225.00
312193401		11/88	225.00	225.00	225.00	225.00		900.00
312193501		11/88	225.00	225.00	225.00	225.00		900.00
312194301		11/88	225.00	225.00	225.00	225.00		900.00
312195601		1/89	294.00	294.00	294.00			882.00
312197401		1/89	225.00	225.00				450.00
312197601		11/88	167.00	167.00				334.00
312198901		11/88	225.00	225.00				450.00
312199101		1/89		38.00				38.00
312199301		8/88	97.00	97.00				194.00
313437101		12/88	214.00					214.00
313911301		1/89	225.00	us. 00				450.00
314071301		2/89		225.00	225.00	225.00		675.00
314377701		3/89	294.00	294.00	294.00	294.00		1,176.00
314378201		3/89	167.00	167.00	167.00	167.00		668.00
315069501		11/88	225.00	225.00	225.00	225.00		900.00
316250301		9/88	iii.00					iii.00
316253401		3/89	167.00					167.00
316253901		10/88	346.00					346.00
316254601		7/88	225.00	225.00				450.00
316254901		8/88	294.00	294.00				588.00
3 16256001		3/89	225.00	225.00				450.00
316256801		4/89	294.00	294.00				588.00
316256901		4/89	225.00	225.00				450.00
316257301		3/89	225.00	225.00				450.00
316258701		3/89	294.00	294.00				588.00
317245601		10/88	167.00	167.00				334.00
317283701		4/89	225.00	225.00				450.00
317900501		7/89	167.00					167.00
318203001		5/89	225.00	225.00				450.00
319687901		3/89	294.00					294.00
321441201		c/a9	225.00	225.00				450.00
321441901		5/89	225.00	225.00				450.00
321442101		3/89		225.00				225.00
321443301		5/89	91.00	91.00				182.00
321701101		3/89	225.00	225.00				450.00
321701201		4/89	225.00	225.00				450.00
321701701		6/89	167.00	167.00				334.00
321702001		5/89	225.00	225.00				450.00
321702201		6/89	167.00	167.00				334.00
321702401		3/89		294.00				294.00
321705 101		7/88	155.00	155.00				310.00
321705501		5/89	346.00	346.00	346.00			1,038.00
321707501		3/89	225.00					225.00

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Special Refugee Report

Costs Associated with Insufficient Lead Time for Policy Changes

321708701	*	5/89	225.00	225.00	225.00	225.00	900.00
321709501		9/88	294.00	294.00	294.00		882.00
321709601		4/89	225.00	225.00	225.00	225.00	900.00
321920201		3/89	239.00				239.00
321960301		2/89	225.00				225.00
324738901		8/89	225.00	225.00			450.00
326132201		12/88	167.00	167.00			334.00
326830501		6/89	400.00	400.00	400.00		1,200.00
326832101		5/89	225.00				225.00
326832701		4/89	225.00	225.00	225.00		675.00
326833601		6/89	215.00	215.00	215.00	215.00	860.00
326834001		6/89	225.00	225.00			450.00
326834601		6/89	225.00				225.00
326835101		5/89	225.00	225.00	225.00	225.00	900.00
326836901		5/89	225.00	225.00	225.00	225.00	900.00
326838401		6/89	346.00	346.00	346.00	346.00	1,384.00
326838901		6/89	225.00	225.00	225.00		675.00
326839001		7/89	225.00	225.00	225.00		675.00
327051401		8/89	225.00	225.00			450.00
327052501		3/89	225.00	225.00			450.00
327053801		7/89	54.00	86.00			140.00
327054101		7/89	294.00	294.00	294.00	294.00	1,176.00
327056001		7/89	225.00				225.00
327058401		8/89	225.00				225.00
327059301		a/a9	294.00	294.00			588.00
327059401		1/89	346.00				346.00
327059801		7/89	294.00				294.00
327595001		10/89		294.00			294.00
328441301		9/89	225.00				225.00
328442801		9/89	225.00				225.00
328443601		4/89	225.00				225.00
320447501		9/89	225.00	225.00	336.00	225.00	1,011.00
328447701		9/89	225.00				225.00
328448301		12/89				225.00	225.00
328449701		9/89	225.00				225.00
328450001		9/89	225.00	225.00			450.00
330219601		9/89		500.00	500.00	500.00	1,500.00
330221301		10/89			167.00	167.00	334.00
330221401		10/89			167.00	167.00	334.00
330221801		5/89		346.00	346.00	346.00	1,038.00
331349301		8/89	225.00	225.00	225.00	225.00	900.00
332989401		9/89	294.00	294.00	225.00	225.00	1,038.00
335149401		9/89				225.00	225.00
336131601		9/89	225.00	225.00			450.00
336132101		9/89	225.00	225.00			450.00
336132601		8/89	225.00	225.00			450.00
336135101		9/89	225.00	225.00			450.00
336137201		8/89	225.00	225.00			450.00
336137501		9/89	167.00	167.00			334.00
336137801		9/89	125.00				125.00
336138401		9/89	294.00	294.00			588.00
336138601		3/89		225.00			225.00
336139301		9/89	185.00	185.00			370.00
336139601		9/89	294.00	294.00	294.00		882.00

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15-Dec-91 TIMELIMIT

Special Refugee Report

costs	Associated	with Insufficient lead	Time for	Policy Changes				
336140001	*		9/89	225.00	225.00			450.00
338198801			10/89		544.00	544.00	544.00	1,632.00
338282901			11/89			153.00	153.00	306.00
338550601			8/89		225.00			225.00
338550701			9/89		225.00	225.00	225.00	675.00
338551101			10/89		400.00			400.00
338551701			9/89	294.00				294.00
338552501			9/89	294.00	294.00			588.00
338554501			7/89	294.00	294.00			588.00
338554901			9/89	22s .00				22s .00
338555201			10/89		22s .00			22s .00
338556301			5/89	294.00	294.00			588.00
338556501			11/89			294.00	294.00	588.00
338556801			5/89	225.00	225.00			450.00
338557101			9/89		225.00	22s .00	22s .00	675.00
339104501			12/89				346.00	346.00
339674001			11/89			22s .00	22s .00	450.00
339676001			12/89				167.00	167.00
339682101			11/89			225.00	225.00	450.00
33968300 1			11/89			225.00	225.00	450.00
339683801			11/89			22s .00	22s .00	450.00
339684101			10/89		22s .00	22s .00	22s .00	675.00
339686201			11/89			294.00	294.00	588.00
340274101			5/89		346.00	346.00	346.00	1,038.00
340859101			12/89				225.00	225.00
				-----		-----	
Total Dollars				34,386.00	30,558.00	14,178.00	10,726.00	89,843.00
Client Count				180				
				64,944		24,904		

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12-Dec-91 XMONTHI
AFDC REFUGEE PROGRAM
24 TO 4 MONTH POLICY

ENTRY DATE	24 MONTHS	4 MONTHS	GRACE PERIOD JAN 90 FEB 90	MORATORIUM PERIOD MAR 90 APR 90
FEB 88	JAN 90	DEC 89	X	X
MAR 88	FEB 90	DEC 89	X	X
APR 88	MAR 90	DEC 89	X	X
MAY 88	APR 90	DEC 89	X	X
JUN 88	MAY 90	DEC 89	X	X
JUL 88	JUN 90	DEC 89	X	X
AUG 88	JUL 90	DEC 89	X	X
SEPT 88	AUG 90	DEC 89	X	X
OCT 88	SEPT 90	DEC 89	X	X
NOV 88	OCT 90	DEC 89	X	X
DEC 88	NOV 90	DEC 89	X	X
JAN 89	DEC 90	DEC 89	X	X
FEB 89	JAN 91	DEC 89	X	X
MAR 89	FEB 91	DEC 89	X	X
APR 89	MAR 91	DEC 89	X	X
MAY 89	APR 91	DEC 89	X	X
JUN 89	MAY 91	DEC 89	X	X
JUL 89	JUN 91	DEC 89	X	X
AUG 89	JUL 91	DEC 89	X	X
SEPT 89	AUG 91	DEC 89	X	X
OCT 89	SEPT 91	DEC 89	X	X
NOV 89	OCT 91	DEC 89	X	X
DEC 89	NOV 91	DEC 89	X	X
JAN 90	DEC 91	DEC 89	X	X
FEB 90	JAN 92	DEC 89	X	X
MAR 90	FEB 92	DEC 89	X	X
APR 90	MAR 92	DEC 89	X	X
MAY 90	APR 92	DEC 89	X	X
JUN 90	MAY 92	DEC 89	X	X
JUL 90	JUN 92	DEC 89	X	X
AUG 90	JUL 92	DEC 89	X	X
SEPT 90	AUG 92	DEC 89	X	X
OCT 90	SEPT 92	DEC 89	X	X
NOV 90	OCT 92	DEC 89	X	X
DEC 90	NOV 92	DEC 89	X	X
JAN 91	DEC 92	DEC 89	X	X
FEB 91	JAN 93	DEC 89	X	X
MAR 91	FEB 93	DEC 89	X	X
APR 91	MAR 93	DEC 89	X	X
MAY 91	APR 93	DEC 89	X	X
JUN 91	MAY 93	DEC 89	X	X
JUL 91	JUN 93	DEC 89	X	X
AUG 91	JUL 93	DEC 89	X	X
SEPT 91	AUG 93	DEC 89	X	X
OCT 91	SEPT 93	DEC 89	X	X
NOV 91	OCT 93	DEC 89	X	X
DEC 91	NOV 93	DEC 89	X	X
JAN 92	DEC 93	DEC 89	X	X
FEB 92	JAN 94	DEC 89	X	X
MAR 92	FEB 94	DEC 89	X	X
APR 92	MAR 94	DEC 89	X	X
MAY 92	APR 94	DEC 89	X	X
JUN 92	MAY 94	DEC 89	X	X
JUL 92	JUN 94	DEC 89	X	X
AUG 92	JUL 94	DEC 89	X	X
SEPT 92	AUG 94	DEC 89	X	X
OCT 92	SEPT 94	DEC 89	X	X
NOV 92	OCT 94	DEC 89	X	X
DEC 92	NOV 94	DEC 89	X	X
JAN 93	DEC 94	DEC 89	X	X
FEB 93	JAN 95	DEC 89	X	X
MAR 93	FEB 95	DEC 89	X	X
APR 93	MAR 95	DEC 89	X	X
MAY 93	APR 95	DEC 89	X	X
JUN 93	MAY 95	DEC 89	X	X
JUL 93	JUN 95	DEC 89	X	X
AUG 93	JUL 95	DEC 89	X	X
SEPT 93	AUG 95	DEC 89	X	X
OCT 93	SEPT 95	DEC 89	X	X
NOV 93	OCT 95	DEC 89	X	X
DEC 93	NOV 95	DEC 89	X	X
JAN 94	DEC 95	DEC 89	X	X
FEB 94	JAN 96	DEC 89	X	X
MAR 94	FEB 96	DEC 89	X	X
APR 94	MAR 96	DEC 89	X	X
MAY 94	APR 96	DEC 89	X	X
JUN 94	MAY 96	DEC 89	X	X
JUL 94	JUN 96	DEC 89	X	X
AUG 94	JUL 96	DEC 89	X	X
SEPT 94	AUG 96	DEC 89	X	X
OCT 94	SEPT 96	DEC 89	X	X
NOV 94	OCT 96	DEC 89	X	X
DEC 94	NOV 96	DEC 89	X	X
JAN 95	DEC 96	DEC 89	X	X
FEB 95	JAN 97	DEC 89	X	X
MAR 95	FEB 97	DEC 89	X	X
APR 95	MAR 97	DEC 89	X	X
MAY 95	APR 97	DEC 89	X	X
JUN 95	MAY 97	DEC 89	X	X
JUL 95	JUN 97	DEC 89	X	X
AUG 95	JUL 97	DEC 89	X	X
SEPT 95	AUG 97	DEC 89	X	X
OCT 95	SEPT 97	DEC 89	X	X
NOV 95	OCT 97	DEC 89	X	X
DEC 95	NOV 97	DEC 89	X	X
JAN 96	DEC 97	DEC 89	X	X
FEB 96	JAN 98	DEC 89	X	X
MAR 96	FEB 98	DEC 89	X	X
APR 96	MAR 98	DEC 89	X	X
MAY 96	APR 98	DEC 89	X	X
JUN 96	MAY 98	DEC 89	X	X
JUL 96	JUN 98	DEC 89	X	X
AUG 96	JUL 98	DEC 89	X	X
SEPT 96	AUG 98	DEC 89	X	X
OCT 96	SEPT 98	DEC 89	X	X
NOV 96	OCT 98	DEC 89	X	X
DEC 96	NOV 98	DEC 89	X	X
JAN 97	DEC 98	DEC 89	X	X
FEB 97	JAN 99	DEC 89	X	X
MAR 97	FEB 99	DEC 89	X	X
APR 97	MAR 99	DEC 89	X	X
MAY 97	APR 99	DEC 89	X	X
JUN 97	MAY 99	DEC 89	X	X
JUL 97	JUN 99	DEC 89	X	X
AUG 97	JUL 99	DEC 89	X	X
SEPT 97	AUG 99	DEC 89	X	X
OCT 97	SEPT 99	DEC 89	X	X
NOV 97	OCT 99	DEC 89	X	X
DEC 97	NOV 99	DEC 89	X	X
JAN 98	DEC 99	DEC 89	X	X
FEB 98	JAN 00	DEC 89	X	X
MAR 98	FEB 00	DEC 89	X	X
APR 98	MAR 00	DEC 89	X	X
MAY 98	APR 00	DEC 89	X	X
JUN 98	MAY 00	DEC 89	X	X
JUL 98	JUN 00	DEC 89	X	X
AUG 98	JUL 00	DEC 89	X	X
SEPT 98	AUG 00	DEC 89	X	X
OCT 98	SEPT 00	DEC 89	X	X
NOV 98	OCT 00	DEC 89	X	X
DEC 98	NOV 00	DEC 89	X	X
JAN 99	DEC 00	DEC 89	X	X
FEB 99	JAN 01	DEC 89	X	X
MAR 99	FEB 01	DEC 89	X	X
APR 99	MAR 01	DEC 89	X	X
MAY 99	APR 01	DEC 89	X	X
JUN 99	MAY 01	DEC 89	X	X
JUL 99	JUN 01	DEC 89	X	X
AUG 99	JUL 01	DEC 89	X	X
SEPT 99	AUG 01	DEC 89	X	X
OCT 99	SEPT 01	DEC 89	X	X
NOV 99	OCT 01	DEC 89	X	X
DEC 99	NOV 01	DEC 89	X	X
JAN 00	DEC 01	DEC 89	X	X
FEB 00	JAN 02	DEC 89	X	X
MAR 00	FEB 02	DEC 89	X	X
APR 00	MAR 02	DEC 89	X	X
MAY 00	APR 02	DEC 89	X	X
JUN 00	MAY 02	DEC 89	X	X
JUL 00	JUN 02	DEC 89	X	X
AUG 00	JUL 02	DEC 89	X	X
SEPT 00	AUG 02	DEC 89	X	X
OCT 00	SEPT 02	DEC 89	X	X
NOV 00	OCT 02	DEC 89	X	X
DEC 00	NOV 02	DEC 89	X	X
JAN 01	DEC 02	DEC 89	X	X
FEB 01	JAN 03	DEC 89	X	X
MAR 01	FEB 03	DEC 89	X	X
APR 01	MAR 03	DEC 89	X	X
MAY 01	APR 03	DEC 89	X	X
JUN 01	MAY 03	DEC 89	X	X
JUL 01	JUN 03	DEC 89	X	X
AUG 01	JUL 03	DEC 89	X	X
SEPT 01	AUG 03	DEC 89	X	X
OCT 01	SEPT 03	DEC 89	X	X
NOV 01	OCT 03	DEC 89	X	X
DEC 01	NOV 03	DEC 89	X	X
JAN 02	DEC 03	DEC 89	X	X
FEB 02	JAN 04	DEC 89	X	X
MAR 02	FEB 04	DEC 89	X	X
APR 02	MAR 04	DEC 89	X	X
MAY 02	APR 04	DEC 89	X	X
JUN 02	MAY 04	DEC 89	X	X
JUL 02	JUN 04	DEC 89	X	X
AUG 02	JUL 04	DEC 89	X	X
SEPT 02	AUG 04	DEC 89	X	X
OCT 02	SEPT 04	DEC 89	X	X
NOV 02	OCT 04	DEC 89	X	X
DEC 02	NOV 04	DEC 89	X	X
JAN 03	DEC 04	DEC 89	X	X
FEB 03	JAN 05	DEC 89	X	X
MAR 03	FEB 05	DEC 89	X	X
APR 03	MAR 05	DEC 89	X	X
MAY 03	APR 05	DEC 89	X	X
JUN 03	MAY 05	DEC 89	X	X
JUL 03	JUN 05	DEC 89	X	X
AUG 03	JUL 05	DEC 89	X	X
SEPT 03	AUG 05	DEC 89	X	X
OCT 03	SEPT 05	DEC 89	X	X
NOV 03	OCT 05	DEC 89	X	X
DEC 03	NOV 05	DEC 89	X	X
JAN 04	DEC 05	DEC 89	X	X
FEB 04	JAN 06	DEC 89	X	X
MAR 04	FEB 06	DEC 89	X	X
APR 04	MAR 06	DEC 89	X	X
MAY 04	APR 06	DEC 89	X	X
JUN 04	MAY 06	DEC 89	X	X
JUL 04	JUN 06	DEC 89	X	X
AUG 04	JUL 06	DEC 89	X	X
SEPT 04	AUG 06	DEC 89	X	X
OCT 04	SEPT 06	DEC 89	X	X
NOV 04	OCT 06	DEC 89	X	X
DEC 04	NOV 06	DEC 89	X	X
JAN 05	DEC 06	DEC 89	X	X
FEB 05	JAN 07	DEC 89	X	X
MAR 05	FEB 07	DEC 89	X	X
APR 05	MAR 07	DEC 89	X	X
MAY 05	APR 07	DEC 89	X	X
JUN 05	MAY 07	DEC 89	X	X
JUL 05	JUN 07	DEC 89	X	X
AUG 05	JUL 07	DEC 89	X	X
SEPT 05	AUG 07	DEC 89	X	X
OCT 05	SEPT 07	DEC 89	X	X
NOV 05	OCT 07	DEC 89	X	X
DEC 05	NOV 07	DEC 89	X	X
JAN 06	DEC 07	DEC 89	X	X
FEB 06	JAN 08	DEC 89	X	X
MAR 06	FEB 08	DEC 89	X	X
APR 06	MAR 08	DEC 89	X	X
MAY 06	APR 08	DEC 89	X	X
JUN 06	MAY 08	DEC 89	X	X
JUL 06	JUN 08	DEC 89	X	X
AUG 06	JUL 08	DEC 89	X	X
SEPT 06	AUG 08	DEC 89	X	X
OCT 06	SEPT 08	DEC 89	X	X
NOV 06	OCT 08	DEC 89	X	X
DEC 06	NOV 08	DEC 89	X	X
JAN 07	DEC 08	DEC 89	X	X
FEB 07	JAN 09	DEC 89	X	X
MAR 07	FEB 09	DEC 89	X	X
APR 07	MAR 09	DEC 89	X	X
MAY 07	APR 09	DEC 89	X	X
JUN 07	MAY 09	DEC 89	X	X
JUL 07	JUN 09	DEC 89	X	X
AUG 07	JUL 09	DEC 89	X	X
SEPT 07	AUG 09	DEC 89	X	X
OCT 07	SEPT 09	DEC 89	X	X
NOV 07	OCT 09	DEC 89	X	X
DEC 07	NOV 09	DEC 89	X	X
JAN 08	DEC 09	DEC 89	X	X
FEB 08	JAN 10	DEC 89	X	X
MAR 08	FEB 10	DEC 89	X	X
APR 08	MAR 10	DEC 89	X	X
MAY 08	APR 10	DEC 89	X	X
JUN 08	MAY 10	DEC 89	X	X
JUL 08	JUN 10	DEC 89	X	X
AUG 08	JUL 10	DEC 89	X	X
SEPT 08	AUG 10	DEC 89	X	X
OCT 08	SEPT 10	DEC 89	X	X
NOV 08	OCT 10	DEC 89	X	X
DEC 08	NOV 10	DEC 89	X	X
JAN 09	DEC 10	DEC 89	X	X
FEB 09	JAN 11	DEC 89	X	X
MAR 09	FEB 11	DEC 89	X	X
APR 09	MAR 11	DEC 89	X	X
MAY 09	APR 11	DEC 89	X	X
JUN 09	MAY 11	DEC 89	X	X
JUL 09	JUN 11	DEC 89	X	X
AUG 09	JUL 11	DEC 89	X	X
SEPT 09	AUG 11	DEC 89	X	X
OCT 09	SEPT 11	DEC 89	X	X
NOV 09	OCT 11	DEC 89	X	X
DEC 09	NOV 11	DEC 89	X	X
JAN 10	DEC 11	DEC 89	X	X
FEB 10	JAN 12	DEC 89	X	X
MAR 10	FEB 12	DEC 89	X	X
APR 10	MAR 12	DEC 89	X	X
MAY 10	APR 12	DEC 89	X	X
JUN 10	MAY 12	DEC 89	X	X
JUL 10	JUN 12	DEC 89	X	X
AUG 10	JUL 12	DEC 89	X	X
SEPT 10	AUG 12	DEC 89	X	X
OCT 10	SEPT 12	DEC 89	X	X
NOV 10	OCT 12	DEC 89	X	X
DEC 10	NOV 12	DEC 89	X	X
JAN 11	DEC 12	DEC 89	X	X
FEB 11	JAN 13	DEC 89	X	X
MAR 11	FEB 13	DEC 89	X	X
APR 11	MAR 13	DEC 89	X	X
MAY 11	APR 13	DEC 89	X	X
JUN 11	MAY 13	DEC 89	X	X
JUL 11	JUN 13	DEC 89	X	X
AUG 11	JUL 13	DEC 89	X	X
SEPT 11	AUG 13	DEC 89	X	X
OCT 11	SEPT 13	DEC 89	X	X
NOV 11	OCT 13	DEC 89		

16-Dec-91 TIMELIMIT

Special Refugee Report
Costs Associated with Insufficient Lead Time for Policy Changes

1. AFDC-Refugee Eligibility Period from 31 months to 24 months effective 2-1-88

Family Number	Name	Entry Date	Grace Period		Xoratorium		Total
			Feb 88	Mar 88	Apr 88	May 88	
182727801	*	9/85	211.00				211.00
182728001		9/85	180.00				180.00
205898001		11/85	467.00	467.00			934.00
208382701		4/86			275.00	275.00	550.00
208852401		12/85	375.00				375.00
208857601		1/86	324.00	324.00	324.00		972.00
210006501		1/86	275.00	275.00	275.00	275.00	1,100.00
210343101		3/86		324.00	324.00	324.00	972.00
211735201		3/86		324.00	324.00	324.00	972.00
223534401		10/85	156.00	156.00			312.00
232668001		5/86				275.00	275.00
Total Dol tars			1,988.00	1,870.00	1,522.00	1,473.00	6,853.00
Client Count			11				
			3858			2995	

* Individual's names have been deleted from this response in accordance with the provisions of the Privacy Act.

G.P	M.
64,944	24,904
<u>3858</u>	<u>2995</u>
68,802	27,899