Using Fiscal Data to Inform a State's Part C Allocation Methodology

January 2016

Maureen Greer
Jamie Kilpatrick
Katy McCullough
Kellen Reid
The DaSy Center

DaSy
The Center for IDEA Early Childhood Data Systems

This document was developed by members of the DaSy Finance workgroup through collaboration with the Early Childhood Technical Assistance Center (ECTA). We would like to acknowledge and thank the IDEA Infant & Toddler Coordinators Association (ITCA) Finance Committee for their review and input. We also thank ITCA, ECTA, and the National Center for Systemic Improvement (NCSI) for laying the foundation for this document through material presented as part of the ITCA Fiscal Initiative. We also want to thank the Washington Part C program for providing a state example used in this brief.

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U.S. Office of Special
Education Programs

January 2016

Suggested citation:
Greer, M., Kilpatrick, J., McCullough, K., & Reid, K. (2016). *Using fiscal data to inform a state's Part C allocation methodology*. Menlo Park, CA: SRI International.

Contents

This is the third in a series of documents developed by the DaSy Center on using fiscal data in the management of a state's Part C system. Additional documents in this series cover information on understanding and using fiscal data elements and budget development and management.

Introduction

Using Fiscal Data to Inform a State's Part C Allocation Methodology is designed to provide state Part C staff with guidance on using fiscal data to analyze and revise their allocation methodology. The information is organized into four major sections:

    i.   Overview of Allocation Methods

    ii.   Using Fiscal Data to Assess Equitability of the Current Allocation Methodology to Meet the Needs of the Part C System

    iii.   Steps for Making Reallocation Decisions and Informing Selection

    iv.   Moving Forward with Implementing a Plan

In a general sense, an allocation methodology dictates how limited resources are distributed in any number of scenarios where an unambiguous decision is made about who will receive what portion of those resources. More specifically, for the purpose of this document:

Allocation methodology is the process–including practices, strategies, procedures, and policies–used by Part C state staff to equitably distribute funds to meet the needs of the system, including the children and families served.[1]

An **equitable distribution** is a prudent, fair, and transparent method of allocating funds.[2]

Even as this definition gives us some common ground, the intrinsic differences across states, Part C programs (e.g., lead agency, funding sources), and even personnel titles (e.g., early interventionists, ABA specialists) generate significant differences in "the process," "equitability," "funds," and "system needs."

Framework connection: In the Finance component of the ECTA System Framework (ECTA, 2015) Quality Indicator FN4 describes the use of fiscal data to manage the budget by state and regional and/or local system entities, including the use of fiscal data to inform budget development and adjustment and re-distribution of funds and resources based on service and program needs.

Many factors can prompt revisions to your state's allocation methodology, including infusion of additional funds, reduction in available funds, identified inequities across local programs, or political pressure to revisit the process. Given that the resources and needs of any state's early intervention program are dynamic, changes in available resources and/or needs necessitate a strategic reallocation of the most readily modifiable variable—available resources. Amidst the numerous and unpredictable factors affecting the needs of your system, it is vital for state Part C staff to be familiar with the fiscal data they have available—and how to use those data—to make informed, transparent decisions about the allocation of these resources.

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[1] Allocation Methodology definition adapted from ECTA FW Subcomponent 4, QI FN4: http://ectacenter.org/sysframe/component-finance.asp

[2] Equitable distribution methodology definition adapted from ECTA FW Glossary: http://ectacenter.org/sysframe/glossary.asp#Equitably_Allocate

Examples of fiscal data that can inform your allocation methodology are all-revenue sources versus costs by program, by provider, or by demographics. Figure 1 shows the types of programmatic and policy questions that can be addressed with access to and proper use of these data in the context of a well-developed understanding of allocation methodology. As one thing builds upon another, you may begin to appreciate how the value of your state's Part C allocation methodology is inextricably and directly related to the quality of its budget and, by extension, the quality of the state's fiscal data.

High-quality data, in particular, also better inform an allocation method vis-à-vis equitability, where quality is in the consistent application and use of fiscal data definitions (as through data dictionaries) such that components like indirect costs across local programs have the same definition, making that cost comparable across programs. In fact, use of standardized language, access to a suitable array of fiscal data, knowledge of proper analysis techniques, and an appropriate reallocation methodology represent the full arsenal of information and skills needed to maximize Part C dollars, identify service shortfalls, and calculate the effects of changes to the existing allocation methodology.

This document will further discuss the importance of analyzing your state's allocation methodology, the questions that fiscal data can help to answer during that process, the types of data that can inform an analysis of allocation methodology, and present an approach for assessing and ultimately making data-informed decisions about how to revise your allocation methodology.
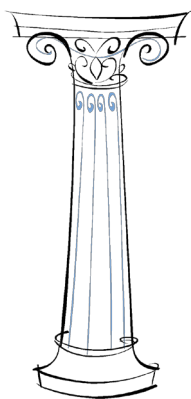
Figure 1. Allocation Methodology's Important Programmatic Questions

1. What is the current allocation methodology that is in place?
2. Is the current allocation methodology meeting the service needs of children and families? The administrative costs of the system? Both?
3. If not, what fiscal data are available to identify the gaps/shortfalls and the excess (e.g., by geographic distribution, demographics, etc.)?
4. Based on the fiscal data available, what budget impact might occur by revising the allocation methodology to a new formula versus retaining the existing methodology?
5. How does a state mitigate any negative repercussions that may result from implementation of a reallocation methodology barring any additional influx of funds?

I. Overview of Allocation Methods

As states begin the process of examining their existing allocation methodology, the first step is to recognize the structure of their state Part C system and the process that is used to move funding from the lead agency to the local provider network. It is important to identify the unique organization of each state Part C system and how funding for services and infrastructure works at the state and local levels. However, regardless of state structure and payment methodology, each state should determine which fiscal data elements are useful for equitably allocating funds.

State Part C system infrastructure can be generally categorized by one of the following types:

✳ Programs/agencies are responsible for all eligible children from referral through transition in an assigned regional or local catchment area. Services are provided by staff of the entity or contractors hired by the entity.

✳ Programs/agencies are responsible for referral to initial IFSP development including service coordination in an assigned regional or local catchment area. Services are paid for through a statewide central reimbursement system that pays providers/practitioners.

✳ State employs staff who work at the state, regional, or local level and provide services. State may also hire contractors to supplement.

✻ Multiple state agencies and their regional/local counterparts are responsible for the services children receive based on either eligibility criteria or on a specific service type.

There is no single way to allocate funds that all states should use. The mechanism each state uses to fund infrastructure expenses as well as child and family services varies significantly as documented below:

✻ A majority of states use contracts and grants to fund local programs.

✻ Some states use a centralized billing process (sometimes referred to as a "Pay and Chase" model).

✻ Other states reimburse using a fee-for-service mechanism or cost reimbursement.

✻ Some states combine mechanisms (e.g., a contract that is drawn down by fee-for-service) in funding local programs.

States may employ more than one payment mechanism when supporting infrastructure activities as opposed to direct services. States may use a grant/contract to support local administrative functions and use a centralized billing process for direct services. For most states, the payment mechanism is historic in nature and reflects payment practices that existed when the Part C system was developed.

Data elements your state can consider when allocating funds

Historic growth and expenditure patterns are the most common data elements used to inform allocation methodologies, regardless of the state structure and payment methodology. Your consideration of additional fiscal data elements and external local funding sources will improve the value of your state's Part C allocation methodology.

In a 2014 Finance Survey conducted by the IDEA Infant and Toddler Coordinators Association (ITCA), the most common data elements identified by states used to inform their allocation methodologies were number of children served in previous years, historic growth patterns, and historic expenditure patterns. While historic expenditure is a relevant factor, rewarding higher expenditures without examining the other data elements can send the message that the more you spend in the current funding cycle, the more you will get in the next funding cycle.

Appropriate fiscal data elements to consider in order to maximize Part C dollars include:

✻ demographics of each region,

✻ the utilization of Medicaid or commercial insurance, and

✻ population growth.

Other types of data elements that states could use to inform their allocation methodologies are presented in Figure 2.

While the lead agency can only directly control the allocation

> **Figure 2. Potential Data Elements**
>
> - Geography
> - Birth Rate
> - Poverty Rate
> - Population Growth
> - Public and Commercial Insurance Utilization
> - Other Program Eligibilities
> - Homelessness
> - CAPTA Referrals
> - Premature Births
> - Private Fund Sources

of funds for which they have primary responsibility, the lead agency should consider the other revenue available through other funding sources and whether or not those funds are being fully accessed. A region that has significant public insurance participation will not need as much supplemental state funding. Likewise a region that has significant commercial insurance utilization will need less state/federal funding.

A discussion of how to analyze budget management data is contained in the document *Use of Data for Fiscal Management of State Part C Systems*. By doing this, the lead agency can begin to understand utilization patterns and make informed decisions on allocation methods.

 * Examine research-based information in order to identify the strategies and practices that would best address their needs,
 * Communicate the goals and strategies in their plan to all stakeholders,
 * Evaluate the effectiveness of programs, and
 * Maintain ongoing feedback loops to consistently address local service needs.

State early intervention leaders thereby support and promote the use of comparable fiscal and programmatic data that identify local service needs while informing an ongoing assessment of the equitability of the current allocation methodology.

III. Steps for Making Reallocation Decisions

When aspects of the current allocation methodology are ineffective, your state Part C program can begin developing a new methodology to better meet the needs of the system, including children and families. An effective process includes establishing a stakeholder team, identifying a vision, considering allocation elements and their accuracy, and garnering support for change.

> *Framework connection:* In the Finance component of the ECTA System Framework (ECTA 2015) Quality Indicator FN7 illustrates the elements of quality necessary to equitably allocate funds to meet the needs of the system, including the use of geographic and demographic data, supporting the implementation of evidence-based practices, and the method being predictable and transparent to stakeholders.

Process

Establishing a Stakeholder Team

Revising an allocation methodology frequently means redistributing funds. Without the addition of any new funding, some entities will receive more funds per the new formula while others will receive fewer. Using a team of stakeholders to review potential allocation data elements and determine a methodology that they consider to be equitable is an effective way to mitigate the negative repercussions of the newly selected methodology. Stakeholders who are knowledgeable about programmatic and fiscal issues provide insight into programmatic impact and can be effective supporters for establishing buy-in across levels of the system.

Identifying a Vision to Guide the Process

Once established, the stakeholder team should develop a vision or guiding principles to inform the selection of a new allocation methodology. The vision should be derived from the inadequacies identified in the current methodology and should strive to more equitably allocate funds in a manner that relies on accurate data to predict need and capacity across receiving entities. Stakeholders should measure the narrowing and/or selection of potential allocation data elements against the identified vision or guiding principles. Only elements that align with the vision should be included.

Allocation Data Elements to Consider

The stakeholder team decides which combination of allocation data elements to put together to calculate the percentage of the total allocation to be received by each programmatic entity. Potential data elements to consider in a given allocation methodology are listed in Figure 2. The stakeholder team can use analyses such as a cost study or rate study to inform this process, or refer to fiscal data pulled together from various resources for this purpose.

Allocation formulas can be simple or complex. Formulas can appear to be neutral and rational because they are mathematical in nature, but for them to be equitable, the state stakeholder team should compare the level of need with availability of additional revenue and resources (or capacity) within each local entity. This can be tricky as your state stakeholder team strives to find a balance between providing more support for localities with fewer available funding sources and 'penalizing' communities for having access to local funds.

Figure 3 shows a sample template of the allocation data elements your state stakeholder team might consider for each local entity. The data elements chosen may, in part, depend on your state's system of payments and the various revenue sources accessed. By depicting the fiscal data in this manner, your state would identify variations in need (actual and potential) across local entities and capacity (available resources) across local entities to meet that need. While this type of analysis can be done for the previous year, a multi-year scan will be more predictive of trends in both need and capacity over time.

Figure 3.   Sample Template of Allocation Data Elements

Region/Entity	Need			Capacity					
	Birth Rate*	Number of children served	Population Growth Rate*	Medicaid Eligible*	Medicaid Revenue	Annual Private Insurance Revenue	Annual Family Fees Collected	Other Annual Local Revenue	In-Kind Contributions from Other Early Care and Education Programs
1. Valley									
2. Highlands									
3. Coast									

* As a percentage of EI population within a defined geographic area.

Based on a review of these data elements in Figure 3, your state can explore a methodology that takes into consideration regional differences, providing weight to elements that are most predictive of need and capacity. For example, a state that bills Medicaid and private insurance for early intervention services may find that revenue generated on behalf of children covered by private insurance is not as substantial as revenue generated through Medicaid. Therefore, your state may determine that regions with a higher percentage of children with private insurance should receive a higher allocation than regions with a higher percentage of Medicaid-eligible children, in order to assure more equitable resources across regions to cover the costs of services. State fiscal staff will be vital in this type of analysis, as your state considers various combinations.

Next, the stakeholder team can compare selected combinations of data elements from which to base the allocation formula to historical expenditure patterns by regional program or entity over time. The team can then see which combinations are the best fit of capacity of resources to meet the need across regions or entities statewide. As mentioned earlier, it is important to examine other data elements in conjunction with historic expenditure patterns (e.g., IFSP outcomes as well as services authorized and delivered) in order to obtain a more complete understanding of program practices by region/entity and not simply reward higher expenditures with a higher allocation of funds. State administrators should be tracking expenditures by regional program or provider to look for expenditure patterns and service trends that may influence the allocation methodology.

A State Example: Washington

Washington State recently revised its allocation formula due to several factors including the results of a recent cost study, emergency requests for additional funds, changes in population demographics, and revisions to the state's System of Payments policies. Over the course of several stakeholder meetings the state ended up using two primary data elements: a base rate per county and a per child rate (multiplied by the cumulative count of children served in the previous year) to arrive at an allocation per catchment area. While regional differences in revenue were not included in the calculation, variance in the number of counties included in the catchment area and the number of children served were addressed.

A spreadsheet depicting Washington's revised funding formula and phase-in plan related to Example 1 can be found in the appendix of this document.

Figure 4. Example of a Revised Allocation Methodology Scenario and Calculation: The State of Washington

Example 1. State of Washington's Reallocation
Scenario
The state of Washington revisited its allocation formula in 2014. Per input from stakeholders, the state maintained the priority to keep the formula simple and transparent. They started with the total amount ($7.5 million) as a base allocation to be divided by county (39 in the state) in an effort to address variance in the number of counties covered by service catchment area. They then ran various percentage calculations of the total amount to be used as the base allocation in an effort to ensure that larger counties would not disproportionally benefit while smaller counties remained stable. The most equitable was a calculation of 8% of the total to be used as the base calculation per county (using a higher percentage would harm smaller counties), which established a flat base rate of $15,385. The resulting total base amongst all the counties served is $600,000. For service areas serving more than one county, the base would be half, double, or triple the flat base rate of $15,385 (15,385 base x # of counties served). The remainder of the funds available are then divided by the cumulative count of children served in the previous year (as identified by the number of IFSPs) to arrive at a per child allocation for each service area. This is then added to the base calculation for the service area.
Calculation
Step 1: Determine Base for the 39 Counties

The equitable base calculation per county is the "equitable" percentage of the total amount available to be used per county and provides the base allocation per county in dollars. In this example, Service Area A covers 4 counties. Each county gets a base of $15,385. Because Service Area A has more than one county, the base allocation is $15,385 x 4 counties, or $61,540.	$\$7{,}500{,}000 \times 8\%\ per\ county$ $= \$15{,}385\ per\ county$ $\mathbf{\$15{,}385 \times 4\ counties = \$61{,}540}$

Step 2: Determine Per IFSP	
The per IFSP calculation is the total dollar amount available less the total base allocation for all counties divided by the cumulative count of children served for the previous year. This calculation provides the allocation amount per IFSP in dollars.	$\dfrac{\$7{,}500{,}000 - \$600{,}000}{12{,}550\ children\ per\ year}$ $= \$550\ per\ IFSP\ per\ year$

Step 3: Determine Total IFSP for Each Service Area	
This calculation is the product of the dollars per IFSP per year, multiplied by the number of children served during this period by service area. The result is the total dollar amount based upon the per IFSP funding for each service area in a given time period. Here, the $550 per IFSP per year is multiplied by the number of children served during this period by Service Area A ($550 x # of children served)	$550 *per IFSP per year* $\times$ 709 *children per year* = $389,950 *for Service Area A*
Step 4: Base plus IFSP per Service Area	
This calculation is the sum of the base allocation and the total IFSP funding for each service area to provide the dollars (i.e., allocation amount) to give each contractor for each contract. In the example, the base allocation for Service Area A ($15,385 per county x 4 counties) is added to the total IFSP funding for Service Area A ($550 x 709 children).	$61,540 + $389,950 = $452,490 *Total Allocation*

Garnering Support for Change

As your state revises its allocation methodology, the team of stakeholders, including families, provides a sounding board about whether or not the state is being successful in meeting its vision in revising the allocation methodology. This input can be facilitated in various ways, such as continuing to refer to the vision throughout the analysis process, soliciting input from team members based on their specific knowledge and expertise, and seeking additional input from topical experts not represented on the stakeholder team. Additional input may also be sought through State Interagency Coordinating Council (SICC) membership, community meetings, and public hearings. The stakeholder team also should be intentional, consistent, and transparent in messaging to the public, and in sharing the vision and rationale for the change.

IV. Moving Forward with a Plan

Once the revised allocation methodology has been determined, the state must develop a plan for implementation. The plan should include:

✴ Potential strategies to minimize the negative impact on those entities likely to face a reduction based on the new allocation methodology, e.g., phase in the reduction over the course of 1–4 years, depending on how much the entity stands to lose according to the new calculation. (See Example 1 for an example of Washington's Phase-in Plan.)

✴ Tracking fiscal data throughout the course of the first year and beyond and reviewing those data with the stakeholder team. This review will determine the extent to which the new allocation methodology is proving to be equitable in meeting the needs of the local entities, and if not, why not.

✴ A review and revision of the allocation methodology, as necessary, based upon available data.

✴ Intentional alignment of the revised methodology with the overall plan for developing and sustaining the Part C finance system. (For more details go to A Framework for Developing and Sustaining a Part C Finance System: http://ectacenter.org/~pdfs/pubs/nnotes23.pdf.)

Conclusion

The importance of a transparent process for analyzing the impact of any proposed change in a state's allocation methodology is paramount. Including stakeholders in the discussion provides an opportunity for multiple perspectives that can be incorporated into the final decision. The lead agency can only control the allocation of funds for which they have primary responsibility. For some states with limited fiscal resources, the only funds the lead agency may control may be federal Part C. Other states with more expansive funding may be looking at responsibility for allocating multiple fund sources.

Clear principles and a data-informed, defensible methodology should guide allocation decisions because any discussion of a change in the existing allocation methodology may be fraught with anxiety and fear. The change from what is known to the unknown, especially in the absence of new funding, creates tension among providers because there will inevitably be provider agencies that receive more and others who will receive less funding. However, when your state uses fiscal data in combination with the processes and protocols defined in this spotlight, you can ensure funding allocation that equitably meets local system needs. Below is a summation of the steps to consider:

* Have a clearly articulated vision to guide revisions to your allocation methodology.
* Get buy-in from stakeholders for the vision to help guide the deliberations regarding which elements to include in the proposed methodology.
* Use fiscal and program data to review equitability of any proposed formula. This review should include consideration of qualitative as well as quantitative data.
* Once there is consensus on a new formula, consider the timing of implementation.
  * Analyze which providers will be hurt by the revised formula so you can determine whether the new formula should be phased in to minimize any dramatic changes.
  * Identify ways to support individual providers who are negatively impacted by the reallocation, so the state can keep maintain the participation of these providers.

Implications for data system design and enhancements needed to conduct analyses to determine an equitable allocation methodology can be informed by the Data System Framework. The subcomponent on System Design and Development (SD) specifies the data elements and features needed to support accountability, program improvement and program operations. The elements are divided into three primary categories; child level, service provider level and local early intervention program level (including fiscal data on funds budgeted and expended in total and by revenue source).

> *Framework connection:* The System Design and Development (SD) subcomponent of the Data System Framework Quality Indicator SD4 specifies the types of fiscal and program data elements needed to support accountability, program improvement and program operations. The Data Use (DU) subcomponent Quality Indicator DU5 addresses how state and local staff can use data to inform decisions.

For more information on the critical role of fiscal data for Part C systems, and how fiscal data can be used to answer key policy questions, see the DaSy publication available on the DaSy website *Understanding and Using Fiscal Data: A Guide for Part C State Staff*. For an in-depth look at the integral role of fiscal data in budget development and management, see the DaSy publication available on the DaSy website *Use of Data for Fiscal Management of State Part C Systems*.

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Appendix:
Revised Funding Formula Four Year Plan

REVISED FUNDING FORMULA FOUR YEAR PLAN
"SAMPLE" PHASE IN PLAN AND REDUCTION IN ANNUAL ALLOCATION

Counties Served	8%	2013-2014 Cumulative Counts	Per IFSP	Projected FFY 15 Allotments	FFY14 Allotments	Reduction/Increases	Percent Reduction/Increase	Year 1	FFY15	Year 2	FFY16	Year 3	FFY17	Year 4	FFY18
1	15,385	93	51,150	66,535	136,670	(70,135)	-51%	(17,534)	119,136	(17,534)	101,603	(17,534)	84,069	(17,534)	66,535
4	61,540	709	389,950	451,490	521,549	(70,059)	-13%	(17,515)	504,034	(17,515)	486,520	(17,515)	469,005	(17,515)	451,490
2	30,770	553	304,150	334,920	383,750	(48,830)	-13%	(12,208)	371,543	(12,208)	359,335	(12,208)	347,128	(12,208)	334,920
1	15,385	1388	763,400	778,785	824,665	(45,880)	-6%	(15,293)	809,372	(15,293)	794,078	(15,293)	778,785		778,785
1	15,385	584	321,200	336,585	376,091	(39,506)	-11%	(13,169)	362,922	(13,169)	349,754	(13,169)	336,585		336,585
1	15,385	137	75,350	90,735	128,847	(38,112)	-30%	(12,704)	116,143	(12,704)	103,439	(12,704)	90,735		90,735
1	15,385	157	86,350	101,735	138,499	(36,764)	-27%	(12,255)	126,244	(12,255)	113,990	(12,255)	101,735		101,735
2	30,770	227	124,850	155,620	176,975	(21,355)	-12%	(10,678)	166,298	(10,678)	155,620		155,620		155,620
1	15,385	98	53,900	69,285	89,631	(20,346)	-23%	(6,782)	82,849	(6,782)	76,067	(6,782)	69,285		69,285
2	30,770	247	135,850	166,620	182,458	(15,838)	-9%	(7,919)	174,539	(7,919)	166,620		166,620		166,620
1	15,385	1003	551,650	567,035	579,890	(12,855)	-2%	(12,855)	567,035		567,035		567,035		567,035
3	46,155	60	33,000	79,155	85,970	(6,815)	-8%	(3,408)	82,563	(3,408)	79,155		79,155		79,155
1	15,385	11	6,050	21,435	27,945	(6,510)	-23%	(2,170)	25,775	(2,170)	23,605	(2,170)	21,435		21,435
1	15,385	8	4,400	19,785	24,554	(4,769)	-19%	(2,385)	22,170	(2,385)	19,785		19,785		19,785
1	15,385	24	13,200	28,585	30,326	(1,741)	-6%	(1,741)	28,585		28,585		28,585		28,585
						(439,515)		(148,613)	3,559,207	(134,017)	3,425,190	(109,629)	3,315,561	(47,256)	3,268,305
1	15,385	81	44,550	59,935	59,386	549	1%	549	59,935		59,935		59,935		59,935
1	15,385	9	4,950	20,335	17,945	2,390	13%	2,390	20,335		20,335		20,335		20,335
1	15,385	43	23,650	39,035	33,267	5,768	17%	5,768	39,035		39,035		39,035		39,035
1.5	23,078	730	401,500	424,578	411,529	13,049	3%	6,524	418,053	6,524	424,578		424,578		424,578
1	15,385	61	33,550	48,935	34,026	14,909	44%	7,455	41,481	7,455	48,935		48,935		48,935
1	15,385	128	70,400	85,785	67,000	18,785	28%	9,393	76,393	9,393	85,785		85,785		85,785
2.5	38,463	597	328,350	366,813	346,991	19,822	6%	6,607	353,598	6,607	360,205	6,607	366,813		366,813
2	30,770	67	36,850	67,620	44,519	23,101	52%	11,551	56,070	11,551	67,620		67,620		67,620
1	15,385	123	67,650	83,035	56,519	26,516	47%	8,839	65,358	8,839	74,196	8,839	83,035		83,035
1	15,385	158	86,900	102,285	68,301	33,984	50%	11,328	79,629	11,328	90,957	11,328	102,285		102,285
1	15,385	351	193,050	208,435	170,223	38,212	22%	12,737	182,960	12,737	195,698	12,737	208,435		208,435
1	15,385	3418	1,879,900	1,895,285	1,812,591	82,694	5%	20,674	1,833,265	20,674	1,853,938	20,674	1,874,612	20,674	1,895,285
1	15,385	1485	816,750	832,135	741,022	91,113	12%	22,778	763,800	22,778	786,579	22,778	809,357	22,778	832,135
39	600,015	12,550	6,902,500	7,502,515	7,571,139	370,891		126,592	3,989,911	117,885	4,107,795	82,963	4,190,758	43,452	4,234,210
				7,502,515						7,549,118					7,502,515

$	7,500,000	8%	Percentage Breakdown		Total	IECC	6,000
Max Base Rate	600,000		100%	15,385 per county		7,555,118
Base Difference	-15		50%	7,692 half county		
IFSP TOTAL	6,899,985					
PER IFSP	550					
FLAT BASE RATE	15,385					
COUNTIES	39					