Schedule 13
Change Request for FY 08-09 Budget Request Cycle

Decision Item FY 08-09 ☑ Base Reduction Item FY 08-09 ☐ Supplemental FY 07-08 ☐ Budget Request Amendment FY 08-09 ☐

Request Title: Ongoing CBMS Change Appropriation
Department: Human Services
Priority Number: 15

Dept. Approval by: Reginald Jeffers **Date:** 10/17/07
OSPB Approval: [signature] **Date:** 10/22/07 for 11/1/07

	Fund	1 Prior-Year Actual FY 06-07	2 Appropriation FY 07-08	3 Supplemental Request FY 07-08	4 Total Revised Request FY 07-08	5 Base Request FY 08-09	6 Decision/ Base Reduction FY 08-09	7 November 1 Request FY 08-09	8 Budget Amendment FY 08-09	9 Total Revised Request FY 08-09	10 Change from Base (Column 5) FY 09-10
Total of All Line Items	Total	21,719,443	25,024,815	0	25,024,815	22,890,897	2,838,755	25,729,652	0	25,729,652	2,838,755
	FTE	39.6	35.1	0.0	35.1	47.1	0.0	47.1	0.0	47.1	0.0
	GF	3,488,396	3,881,864	0	3,881,864	3,549,492	0	3,549,492	0	3,549,492	0
	GFE	0	0	0	0	0	0	0	0	0	0
	CF	1,721,826	1,985,945	0	1,985,945	1,814,833	0	1,814,833	0	1,814,833	0
	CFE	7,479,759	8,718,855	0	8,718,855	7,975,468	0	7,975,468	0	7,975,468	0
	FF	9,029,462	10,438,151	0	10,438,151	9,551,104	2,838,755	12,389,859	0	12,389,859	2,838,755
	MCF	7,480,245	8,716,030	0	8,716,030	7,975,468	0	7,975,468	0	7,975,468	0
	MGF	4,365,127	4,021,332	0	4,021,332	3,679,429	0	3,679,429	0	3,679,429	0
	NGF	7,853,523	4,021,332	0	4,021,332	7,228,921	0	7,228,921	0	7,228,921	0
(2) Office of Information Technology Services, Colorado Benefits Management System	Total	21,719,443	25,024,815	0	25,024,815	22,890,897	2,838,755	25,729,652	0	25,729,652	2,838,755
	FTE	39.6	35.1	0.0	35.1	47.1	0.0	47.1	0.0	47.1	0.0
	GF	3,488,396	3,881,864	0	3,881,864	3,549,492	0	3,549,492	0	3,549,492	0
	GFE			0	0		0	0	0	0	0
	CF	1,721,826	1,985,945	0	1,985,945	1,814,833	0	1,814,833	0	1,814,833	0
	CFE	7,479,759	8,718,855	0	8,718,855	7,975,468	0	7,975,468	0	7,975,468	0
	FF	9,029,462	10,438,151	0	10,438,151	9,551,104	2,838,755	12,389,859	0	12,389,859	2,838,755
	MCF	7,480,245	8,716,030	0	8,716,030	7,975,468	0	7,975,468	0	7,975,468	0
	MGF	4,365,127	4,021,332	0	4,021,332	3,679,429	0	3,679,429	0	3,679,429	0
	NGF	7,853,523	4,021,332	0	4,021,332	7,228,921	0	7,228,921	0	7,228,921	0

Letternote revised text: $2,838,755 TANF federal funds represents funds held in the Colorado Works Long-Term Reserve
Cash Fund name/number, Federal Fund Grant name: TANF
IT Request: ☑ Yes ☐ No
Request Affects Other Departments: ☐ Yes ☑ No **If Yes, List Other Departments Here:**

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CHANGE REQUEST for FY 08-09 BUDGET REQUEST CYCLE

Department:	Human Services
Priority Number:	15
Change Request Title:	Ongoing CBMS Change Appropriation

SELECT ONE (click on box):
☒ Decision Item FY 08-09
☐ Base Reduction Item FY 08-09
☐ Supplemental Request FY 07-08
☐ Budget Request Amendment FY 08-09

SELECT ONE (click on box):
Supplemental or Budget Request Amendment Criterion:
☒ Not a Supplemental or Budget Request Amendment
☐ An emergency
☐ A technical error which has a substantial effect on the operation of the program
☐ New data resulting in substantial changes in funding needs
☐ Unforeseen contingency such as a significant workload change

Short Summary of Request:

The Division requests $2,838,755 in ongoing federal Temporary Assistance for Needy Families (TANF) funds spending authority for the Colorado Works program to fund system changes in the Colorado Benefits Management System (CBMS). These funds will be used to serve a purpose of TANF, that is, to build system changes that will better facilitate the statewide implementation of the Colorado Works program. If the funds go unspent, they revert to the Long-Term Reserve pursuant to section 26-2-721 C.R.S. (2007).

Background and Appropriation History:

Increased federal oversight of the State program requires increased State oversight of county programs. As a result, the Division will continue to need to make ongoing adjustments to CBMS to accommodate better data management that will facilitate more efficient county supervision and State compliance with federal regulations.

The General Assembly approved a SFY 2007 supplemental request for $100,000 and a SFY 2008 budget amendment for $250,000 in federal TANF spending authority to fund system changes due to TANF reauthorization in CBMS. In addressing these changes, it

became obvious to the program that the funding authorized was not adequate to fund all of the changes required by the Deficit Reduction Act (DRA), and thus, that an ongoing appropriation is necessary.

Currently, the program has 41 pending change requests totaling about $2,838,755 that may not be built due to a lack of funds. See the Calculations for Request section that provides a representative list with a high-level order of magnitude cost estimate for these changes. This list does not represent significant future change requests mandated by legislative and programmatic changes proposed for SFY 2009 and beyond.

General Description of Request:

Federal reauthorization of the TANF program means higher performance standards for states, both in terms of work participation and work verification. The interim final rule issued by the federal government regarding the reauthorization of the TANF program (45 CFR, Parts 261 - 265) requires that states develop a work verification plan that details the states' plans to verify that the work participation being reported is well-documented and accurate. For Colorado's devolved TANF program, this means a need for increased State supervision of county administration of the program. In addition, TANF reauthorization requires that states meet a 50% work participation rate. As of July 31, 2007, the year to date average all-family work participation rate for Colorado was about 27 percent. If the State fails to meet federal work participation and work verification requirements, the State could incur significant financial penalties.

The federal government continues to clarify the new regulations that govern the reauthorized TANF program. In particular, the federal government has very recently provided feedback on the State's work verification plan. Some of the feedback requires substantial system changes in CBMS. The federal government has indicated that if these changes are not made, the State's work verification procedures will not be accepted and penalties may result.

This request seeks ongoing spending authority for the Colorado Works program to fund system changes in CBMS. Examples of such system changes include the following:

a. Programming changes to facilitate data validation procedures to ensure complete and accurate data reporting to the federal government. The federal government has indicated that states should not plan to continue to rely on federal staff to eliminate data inconsistencies in their federal work participation reports.
b. Programming changes to correct data inconsistencies that are revealed through the data validation process noted above.
c. Reports to assist counties in complying with work verification procedures. Counties need accurate reports to be able to manage their own internal controls so that the counties can be accountable for their data and work participation rates, in much the same way that the State is accountable to the federal government for statewide data and work participation rates.
d. Reports that select cases for State supervisory and county second stage supervisory case file review.
e. Programming changes to refine the existing Numerator Denominator report provided to the counties to more closely match the federal methodology for calculating work participation rates.
f. Programming changes to refine the logic and prevent errors in federal reporting based on continued clarification from the federal government regarding requirements.
g. Programming changes to allow more accurate reporting regarding work eligible individuals and appropriate work activities.
h. A report that extracts a subset of cases subject to work participation requirements.
i. Programming changes that bring the State into compliance with recent federal guidance on the Food Stamps deeming provision.
j. Anticipated additional programming changes and reports as required by ongoing federal interpretation of work participation and verification requirements.

This request should be added to the Colorado Benefits Management System (CBMS) line in the Office of Information Technology Services. The line should be footnoted to clarify

that these funds are to be spent only on TANF projects that support TANF purposes, and are not to be intermingled with funds appropriated based on the funding calculator. If the funds go unspent, they revert to the Long-Term Reserve pursuant to section 26-2-721, C.R.S.

Consequences if Not Funded:

If this request is not funded, the program will continue to request spending authority to fund CBMS changes every year from the General Assembly through decision item and supplemental requests. This option is undesirable as it may take up to a year between the time that a need is identified and spending authority is available. Costs can rise significantly during that time, but more importantly, the State can be subject to sanction. Rather, if this request is granted the Department can act quickly on required system changes with ongoing spending authority. The purpose of this request is to prepare the Department for those system changes imposed upon it, especially by the federal government, of which initially very little detail or notice is provided.

If the State is not able to more efficiently manage and report data, it is at risk for several federal sanctions. If the State fails to meet federal requirements for work participation, the State could be penalized in the first year for up to five percent, or $7.5 million, of the State's $149 million block grant. The State is required to make up for this reduction in its block grant with State or local funds. This means an additional $7.5 million in State or local funds, for a total penalty in the first year of $15 million. In subsequent years of noncompliance, the penalty can go up to as much as 21 percent of the State's block grant.

If the State fails to meet federal requirements for work verification, the State could be penalized in the first year for up to one percent, or $1.5 million, of the State's $149 million block grant. The State is required to make up for this reduction in its block grant with State or local funds. This means an additional $1.5 million in State or local funds, for a total penalty in the first year of $3 million. In subsequent years of noncompliance, the penalty goes up to two percent in the second year, three percent in the third, and so forth.

If the State fails to meet both federal work participation and verification requirements, the State could be penalized for a total amount of up to $18 million in the first year.

Calculations for Request:

Summary of Request FY 08-09	Total Funds	General Fund	Cash Fund	Cash Funds Exempt	Federal Funds
Total Request	$2,838,755				$2,838,755
(2) Office of Information Technology Colorado Benefits Management System (CBMS)	$2,838,755				$2,838,755

COLORADO WORKS OOMs FOR CRs FOR FY 08-09

		EDS OOM HOURS	STATE OOM	EDS COSTS
1924	CW New Funding Type			$171,600
	Automated Calculation of Work Activity Hours	300	$20,000	$45,000
	Work Activity Summary Report	300	$20,000	$45,000
2001	CBMS Maintain Participant Activities Screen-Activity Tab	300	$20,000	$45,000
2005	Modifications to the Numerator/Denominator Report	450	$30,000	$67,500
	Changes to the Federal Sample Report	450	$30,000	$67,500
DT Changes	Adding and Deleting Activities from 24-month check DT		$7,100	
1804	Changes to FLSA			$67,902
DT Changes	Extra Paycheck		$7,100	
1802	TANF Clock	300		$45,000
2000	WFD Client-Report Mirroring Employment First Active Client List	450	$30,000	$67,500
2004	Non-Compliant Edit	450	$30,000	$67,500
791937	2nd Month not Calculated Correctly		$7,100	
777787	Move Late Reported Earnings Logic		$7,100	

798950	Add Not Cooperating w/ Eligible Logic to Child Only Cases		$7,100	
755211	Terminated Income		$7,100	
644	Participation Status Field in WP Track (Issue 4161)	450	$30,000	$67,500
672	4 New Data Elements in ES0005N to Display Workforce Development Clocks	450	$30,000	$67,500
769	Real Property Date Listed For Sale	50	$3,000	$7,500
824	Job Attached (CW DTs)	50	$3,000	$7,500
825	Ethnicity Tab (CW DTs)		$3,000	$8,158
831	Collect Individual Residence Detail (CW DTs)	50	$3,000	$7,500
832	Data Collection Wrap Up and Application Initiation Wrap Up (CW DTs)	450	$30,000	$67,500
833	Maintain Work Program Participation (CW DTs)	50	$3,000	$7,500
835	Collect Domestic Abuse Detail, DC1113N (CW DTs)	50	$3,000	$7,500
908	Add Legacy Activity Codes Into CBMS for Workforce Development	50	$3,000	$7,500
928	ES0017 - Workforce Development End Date Does Not Close Case	450	$30,000	$67,500
1168	CW Indv_Asst Records	450	$30,000	$67,500
1212	Periodic Reporting Report	50	$3,000	$7,500
1740	Allow Non-System Determined Claims For Workforce Development	450	$30,000	$67,500
1802	TANF Clock	450	$30,000	$67,500
1803	Locking Down DC 3405 Once Authorization Has Occurred		$3,000	$4,620
1804	Changes to FSLA		$30,000	$67,902
1829	ACSES Non-Cooperation Interface posting changes		$3,000	$9,900
1830	MSRs changing to No Change System			$12,833
1836	2/07 II Verifications		$3,000	$9,240
1984	DEFECT - error in the BI0060S program	50	$3,000	$7,500
1990	Modify WorkForce Development Employment Activity Profile by County report	50	$3,000	$7,500
2006	Changes to In the Home Y/N	450	$30,000	$67,500
	Date Advance Environment		$100,000	$700,000
	Lock down Sanction Screens	450	$30,000	$67,500

			$661,600.00	$2,177,155.00
note: where EDS hours are blank CBMS already had a cost on file				**TOTAL**
				$2,838,755.00

Assumptions for Calculations: The list above was provided by CBMS and EDS and represents a high-level order of magnitude cost estimate for current Colorado Works system changes. This total does not represent significant future change requests mandated by legislative and programmatic changes proposed for SFY 2009 and beyond. In subsequent years, the Department would use the ongoing spending authority to keep up with demand for new change requests.

Impact on Other Government Agencies: This request does not have a direct fiscal impact on other government agencies.

Cost Benefit Analysis:

Cost	**Benefit**
Federal funds impact: $$2,838,755 The $$2,838,755 in appropriations will be funded with dollars held in the Colorado Works Long-Term Reserve.	The State can avoid possible penalties as much as $18 million in the first year. Counties will be able to ensure to the State that their data is accurate and that they have proper internal controls in place. In turn, the State will be able to make the same claim to the federal government. If the State cannot make this assurance to the federal government, the State may incur financial penalties. The State will likely save dollars if it is able to expedite the time it takes to secure spending authority and define the details of the Change Request. An additional benefit will be that the program will be able to better manage data and to understand the TANF caseload.

Implementation Schedule:

Task	Month/Year
Internal Research/Planning Period	April – June 2008
Start-Up Date	July 2008

Statutory and Federal Authority:

Colorado Works Program Act (1997), Section 26-2-712, C.R.S. (2007)

26-2-712. State department duties - authority.

(1) **Plan submission.** The state department shall submit and amend as necessary a plan to the secretary of the federal department of health and human services that is consistent with the provisions of this part 7 and the personal responsibility and work opportunity reconciliation act.

(2) **County block grant allocation.** (a) The state department shall allocate the amount of moneys that shall be provided to a county as a county block grant for the purposes of a county's administration and implementation of the works program pursuant to the formulas described in section 26-2-714.

(b) Except as provided in section 26-2-720, the county block grant shall represent the total amount that a county shall receive from the state for the administration and implementation of the Colorado works program.

(3) **Maintenance of effort.** The state department shall monitor the state's progress toward meeting the levels of spending required under the federal law and section 26-2-713.

(4) **Performance measurements.** (a) The state department shall develop performance goals and a formula for measuring a county's progress toward meeting such performance goals in administering and implementing the works program with county block grants. The state department shall provide data gathered on behalf of each county to the general assembly on a quarterly basis regarding employment- and training-related performance measures for the works program. Such data shall include wages earned by works program participants upon leaving the program, job retention rates, and other related information.

Such data shall be provided through the state department's computerized systems, if available. Counties shall not be required to provide additional manual or computerized systems to gather such data. The state department shall work with the Colorado office of workforce development to gather data on works program participants who participate in training and job placement programs offered by workforce development boards and the result of such participation. Such data shall be provided to the state auditor's office on at least an annual basis as a part of the works program audit pursuant to section 26-2-723.

(b) The formula may be based upon the formula developed by the secretary of the federal department of health and human services after consultation with the national governors' association and the American public welfare association for measuring states' performance under the TANF block grants.

(5) **Oversight.** In connection with overseeing the works program, the state department shall have the specific duties to:

(a) Oversee the implementation of the works program statewide and, in connection with such oversight, develop standardized forms, in addition to the reporting form described in subsection (6) of this section, for the counties' use in streamlining the application process, delivery of services, and tracking of participants;

(b) Monitor the state's progress in meeting the work participation requirements set forth in the personal responsibility and work opportunity reconciliation act;

(c) Establish a process to implement the provisions for regionalization set forth in section 26-2-718 pursuant to which any combination of county departments may be approved by the state department to administer and implement the works program pursuant to the provisions of this part 7;

(d) Establish statewide goals and monitor the state's progress toward meeting such goals for the reduction in the incidence of out-of-wedlock pregnancies;

(e) Monitor the counties' provision of basic assistance grants pursuant to section 26-2-709 and, if necessary due to increased caseloads or economic downturns, do the following to assure that the basic assistance grant is provided in a consistent manner statewide:

(I) Grant funds to one or more counties from the short-term works emergency fund administered pursuant to section 26-2-720; or

(II) If no funds administered pursuant to section 26-2-720 are available:

(A) Request supplemental appropriations from the general assembly, including but not limited to an appropriation from the long-term works reserve fund created pursuant to section 26-2-721; or

(B) Reduce the county block grant of any county that maintains funds in a county reserve account pursuant to section 26-2-714 (5) in order that moneys may be made available to one or more counties to avoid the need to reduce or eliminate the basic assistance grant statewide. If the state department makes a reduction in a county's reserve account pursuant to this sub-subparagraph (B), the state department shall increase such county's block grant for the following fiscal year by the amount of the reduction authorized pursuant to this sub-subparagraph (B); or

(III) After taking the actions described in subparagraphs (I) and (II) of this paragraph (e), take any actions necessary to reduce the costs of, or reduce or eliminate, the basic assistance grant statewide.

(6) **Reporting.** (a) The state department shall develop a uniform reporting form for the counties to use in order to fulfill the reporting requirements set forth in section 26-2-717.

(b) The state department shall develop a request for proposal pursuant to the provisions of section 26-2-719 to award a contract or contracts to an entity or entities to satisfy the reporting requirements set forth in section 26-2-717.

(c) In the event that the state department is not able to award a contract pursuant to the provisions of paragraph (b) of this subsection (6), it shall develop procedures to ensure that the state complies with the reporting requirements set forth in section 26-2-717.

(7) **Case management.** The state department shall develop training for case workers so that they are knowledgeable and may assist participants in:

(a) Identifying goals, including work activities, time frames for achieving self-sufficiency, and the means required to meet these benchmarks;

(b) Obtaining supportive services such as mental health counseling, substance abuse counseling, life skills training, and money management or parenting classes;

(c) Utilizing the family's existing strengths;

(d) Providing ongoing support and assistance to the family in overcoming barriers to training and employment; and

(e) Monitoring the progress of the family toward attaining self-sufficiency.

Final Rule for the TANF Program (1999), 45 CFR Part 261, Subpart E

Subpart E—What Penalties Apply to States Related to Work Requirements?
§ 261.50 What happens if a State fails to meet the participation rates?
(a) If we determine that a State did not achieve one of the required minimum work participation rates, we must reduce the SFAG payable to the State.
(b)(1) If there was no penalty for the preceding fiscal year, the base penalty for the current fiscal year is five percent of the adjusted SFAG.
(2) For each consecutive year that the State is subject to a penalty under this part, we will increase the amount of the base penalty by two percentage points over the previous year's penalty. However, the penalty can never exceed 21 percent of the State's adjusted SFAG.
(c) We impose a penalty by reducing the SFAG payable for the fiscal year that immediately follows our final determination that a State is subject to a penalty and our final determination of the penalty amount.
(d) In accordance with the procedures specified at § 262.4 of this chapter, a State may dispute our determination that it is subject to a penalty.

§ 262.1 What penalties apply to States?
(a) We will assess fiscal penalties against States under circumstances defined in parts 261 through 265 of this chapter. The penalties are:
(1) A penalty of the amount by which a State misused its TANF funds;
(2) An additional penalty of five percent of the adjusted SFAG if such misuse was intentional;
(3) A penalty of four percent of the adjusted SFAG for each quarter a State fails to submit an accurate, complete and timely required report;
(4) A penalty of up to 21 percent of the adjusted SFAG for failure to satisfy the minimum participation rates;
(5) A penalty of no more than two percent of the adjusted SFAG for failure to participate in IEVS;

(6) A penalty of no more than five percent of the adjusted SFAG for failure to enforce penalties on recipients who are not cooperating with the State Child Support Enforcement (IV–D) agency; loan amount, plus interest, for failure to repay a Federal loan;
(8) A penalty equal to the amount by which a State fails to meet its basic MOE requirement;
(9) A penalty of five percent of the adjusted SFAG for failure to comply with the five-year limit on Federal assistance;
(10) A penalty equal to the amount of contingency funds that were received but were not remitted for a fiscal year, if the State fails to maintain 100 percent of historic State expenditures in that fiscal year;
(11) A penalty of no more than five percent of the adjusted SFAG for the failure to maintain assistance to an adult single custodial parent who cannot obtain child care for a child under age six;
(12) A penalty of no more than two percent of the adjusted SFAG plus the amount a State has failed to expend of its own funds to replace the reduction to its SFAG due to the assessment of penalties in this section in the immediately succeeding fiscal year;
(13) A penalty equal to the amount of the State's Welfare-to-Work formula grant for failure to meet its basic MOE requirement during a year in which it receives the formula grant; and (14) A penalty of not less than one percent and not more than five percent of the adjusted SFAG for failure to impose penalties properly against individuals who refuse to engage in required work in accordance with section 407 of the Act.
(b) In the event of multiple penalties for a fiscal year, we will add all applicable penalty percentages together. We will then assess the penalty amount against the adjusted SFAG that would have been payable to the State if we had assessed no penalties. As a final step, we will subtract other (fixed) penalty amounts from the adjusted SFAG.
(c)(1) We will take the penalties specified in paragraphs (a)(1), (a)(2) and (a)(7) of this section by reducing the SFAG payable for the quarter that immediately follows our final decision.
(2) We will take the penalties specified in paragraphs (a)(3), (a)(4), (a)(5), (a)(6), (a)(8), (a)(9), (a)(10), (a)(11), (a)(12), (a)(13), and (a)(14) of this section by reducing the SFAG payable for the fiscal year that immediately follows our final decision.

(d) When imposing the penalties in paragraph (a) of this section, the total reduction in an affected State's quarterly SFAG amount must not exceed 25 percent. If this 25-percent limit prevents the recovery of the full penalty amount imposed on a State during a quarter or a fiscal year, as appropriate, we will apply the remaining amount of the penalty to the SFAG payable for the immediately succeeding quarter until we recover the full penalty amount.
(e)(1) In the immediately succeeding fiscal year, a State must expend additional State funds to replace any reduction in the SFAG resulting from penalties.
(2) The State must document compliance with this replacement provision on its TANF Financial Report (or Territorial Financial Report).

Interim Final Rule for the TANF Program (2006), 45 CFR Part 261.65

§ 261.65 Under what circumstances will we impose a work verification penalty for failure to submit a work verification plan or for failure to maintain adequate procedures to ensure a consistent measurement of the work participation rate?
(a) We will take action to impose a penalty under § 262.1(a)(15) of this chapter if:
(1) The requirements under §§ 261.64(a) and (b) have not been met; or
(2) We determine that the State has not maintained adequate documentation, verification, or internal control procedures to ensure the accuracy of the data used in calculating the work participation rates.
(b) If a State fails to submit an interim or complete Work Verification Plan by the due dates in § 261.64(a), we will reduce the SFAG payable for the immediately succeeding fiscal year by five percent of the adjusted SFAG.
(c) If a State fails to maintain adequate internal controls to ensure a consistent measurement of work participation, we will reduce the adjusted SFAG by the following percentages for a fiscal year:
(1) One percent for the first year;
(2) Two percent for the second year;
(3) Three percent for the third year; (4) Four percent for the fourth year; and
(5) Five percent for the fifth and subsequent years.

(d) If a State complies with the requirements in this subpart for two consecutive years, then any penalty imposed for subsequent failures will begin anew, as described in paragraph (c) of this section.
(e) If we take action to impose a penalty under §§ 261.64(b) or (c), we will reduce the SFAG payable for the immediately succeeding fiscal year.

Performance Measures:

Program	Performance Measure	Outcome	FY-2005-06	FY-2006-07	FY-2007-08	FY-2008-09
			Actual	Actual	Current	Request
Colorado Works Program	Increase actual work participation rates for each federal fiscal year in order to meet mandated federal rates and improve client and family independence and self-sufficiency.	Benchmark	25.00%	35.00%	40.00%	45.00%
		Actual	25.00%	N/A		

Workload Indicators:

Program	Workload Indicator	FY 2005-06	FY 2006-07	FY 2007-08	FY 2008-09
		Actual	Actual	Current	Request
Colorado Works Program	Number of State Management Reviews conducted per year.	7	15	16	16