



September 24, 2012

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Dear Ms. Gay and Mr. Blake:

Colorado Counties Inc. reiterates our support of mandatory reporting for at-risk adults as long as it is fully funded.

We recognize that the SB12-78 Task Force is at a critical point in their decision making and policy recommendations. Many of those decisions will fiscally impact the state and counties. We are writing to register our concerns about the Task Force's ability to accurately and defensibly identify the cost of these decisions in terms of their impact to county departments of human services and county law enforcement.

SB 12-78 charged the task force with estimating the costs, including workload impacts, to be incurred by the state department, as well as the county departments and law enforcement agencies, resulting from the implementation of mandatory reporting in Colorado. We appreciate the opportunity to review data already collected in other states based on workload studies or post-implementation analysis that they conducted for themselves, as well as recommended national APS standards. However, we do need to urge caution in the use of other states' quantitative data since many of those states implemented mandatory reporting before the baby boomer population reached retirement age, which significantly affects the impact of this mandate. Additionally, the state-to-state variations in populations subject to mandatory reporting, the classes of mandatory reporters, and the expectations regarding the use of the system are all material differences that dramatically affect both the cost and ultimate success of a Colorado proposal and the applicability of national standards for adult protective services.

As an example, one critical component needed to determine workload impacts is caseload per caseworker. Adult Protective Services (APS) workers carry an average of 31 cases per worker statewide with caseworkers in the 10 large counties carrying an average of 34 cases. The National Adult Protective Services Association recommends a caseload ratio of 25:1. Recognizing the limits of nationally recommended standard ratios, county cost estimates must include a data justified caseload for Colorado.

As the administrators of APS in Colorado, counties have the front line responsibility for delivering and assisting vulnerable adults. We are statutorily required to have trained APS caseworkers evaluate and investigate reports, arrange for protective services and provide on-going case management. The skills necessary to meet these statutory requirements are acquired, in large part, through state sponsored training; an essential component to achieving the goals set forth in CRS 26-3.1-301(1)(d).

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Another consideration is that APS uses the Colorado Benefit Management System (CBMS) to track and make payments. CBMS was not built to allow APS caseworkers to record and track client health, safety, welfare and intervention data. Because of this, Colorado lacks the ability to track trends in client needs and analyze the outcomes of APS intervention.

Our workloads will increase when mandatory reporting for elders and/or at-risk adults is implemented. Our County Department of Human Services will receive more reports and there will be an expectation from the community that we have been given the resources to protect elders and/or at-risk adults. If those community expectations are not met due to insufficient resources counties will undoubtedly be the first to hear about it.

We are committed to seeing mandatory reporting for at-risk adults succeed. In order for it to succeed, we have to address shortcomings in our current APS system as well as address the new costs associated with implementing mandatory reporting. Failing to do so sets our communities up for false expectations. It also reaffirms our concerns that a report is simply a report and does not result in the services needed to actually help protect this vulnerable population.

Ultimately, if the costs to our county departments and law enforcement agencies are not accurately and defensibly determined and a sustainable, state revenue source is not identified, it is very likely that CCI members will oppose the implementation of mandatory reporting as an unfunded mandate.

We appreciate the work and commitment of the SB12-78 Task Force and look forward to their final report.

Sincerely,



Nancy Sharpe  
Arapahoe County Commissioner



Jack Hilbert  
CCI President  
Douglas County Commissioner