



**COUNTY OF LAKE
BOARD OF SUPERVISORS**

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June 7, 2022

David Kilgore, Director
CA Department of Child Support Services
P.O. Box 419064
Rancho Cordova, CA 95741-9064

RE: Budget Allocation Methodology and Level of Effort Study

Dear Director Kilgore,

First, on behalf of the Lake County Board of Supervisors, I want to thank you and your Department for your constant efforts to ensure vulnerable California children have access to the resources and tools they need to fulfill their potential. The County of Lake and our Department of Child Support Services share your commitment, and it is a privilege to partner with you to support the well-being of every resident.

Our Board is aware a new Level of Effort (LOE) Study will take place in the coming year. We appreciate the LOE is a vital tool in establishing funding for each County's Child Support Services Department.

This new LOE is needed to implement the Federal Final Rule [*specifically, 45 CFR 303.4(b) (2) and 45 CFR 302.56 (c) (1) (iii) which changed California Family Code 17404.1, 17430 and 17432*], and we look forward to it addressing small county issues. A Budget Allocation Methodology that ensures our funding mirrors cost increases is also essential to the continuity of County-level operations.

However, due to long-standing issues with the funding methodology, we cannot wait for the LOE study to be completed. Additional funding is needed *now*.

As you are aware, the current LOE, completed in 2018, treats all counties, "the same." While this may seem "fair," on its face, it significantly disadvantages smaller counties and the children and families we serve.

Large counties have economies of scale smaller counties do not. For example, management and attorneys are included in the case-to-staff ratio. This means small counties have far fewer caseworker staff to divide cases among. In Lake County, with under 20 dedicated full-time equivalents, one person accessing medical or personal leave means a staffing shortage of greater than 5%. While we do our best to cover in the event of short-term absences, extended leaves disrupt service to a greater extent than we find acceptable.

Base funding *must* be provided, to ensure smaller counties can continuously provide the same level of service as our more populous counterparts.

Electronic Data Processing (EDP) funding has not been reevaluated for many years. Insufficient funding harms all counties, because expenses over the EDP funded amount must be supplemented with Administrative dollars. This compromises staffing capacity in other areas. In Lake County, EDP funding covers less than half of our relevant costs. Funding is regularly drawn from other portions of our budget. As a rural, impoverished county, with discretionary funding levels that fall profoundly short of more affluent California counties, the effects of this constant shuffling are severe.

Smaller counties, like Lake, with lesser ongoing staff capacity, routinely face challenges planning for long-term needs, as management staff must be hands-on in the day-to-day work of our departments. Fluctuations in available discretionary revenues due to under-funding of federally mandated and/or State-administered programs materially exacerbate these threats to our business continuity and effectiveness.

Our Board recognizes the Department of Child Support Services is a State- and Federally-mandated program charged with the complex and vitally important role of ensuring counties can provide child support services to our residents.

When child support agencies are not adequately funded, we must choose what services we can provide and what services we can no longer offer our customers. This inevitably leads to inequitable outcomes that frustrate broader statewide and federal objectives.

The County of Lake is committed to ensuring we continue to provide services at the highest level possible. Based on the present funding methodologies, we anticipate a significant General Fund investment will be required for Fiscal Years 2022-23 through 2024-25 to sustain our Child Support Services Department. Such obligations will continue or increase until adequate funding is allocated.

Our Board does not believe it is the intent of our esteemed State and Federal leaders to burden under-resourced communities in this manner.

As a resolution, we ask that small counties be funded at a level that will allow us to provide the same level of service to our customers as larger counties that benefit from economies of scale.

If the California Department of Child Support Services waits for parity to happen among all counties, with the current funding model, small counties will shrink to the point they may not be able to recover.

Instead, please take immediate action to adjust funding allocations, so all California children and families can receive the Child Support services they need and deserve.

Respectfully submitted,

Eddie Crandell, Chair

Cc: State Senator Mike McGuire; Assemblymember Cecilia Aguiar-Curry; Congressman Mike Thompson