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Details:

(FORM UPDATED: 08/11/2010)

WISCONSIN STATE LEGISLATURE ... PUBLIC HEARING - COMMITTEE RECORDS

2007-08

(session year)

Assembly

(Assembly, Senate or Joint)

Committee on ... Elections and Constitutional Law (AC-ECL)

COMMITTEE NOTICES ...

- Committee Reports ... **CR**
- Executive Sessions ... **ES**
- Public Hearings ... **PH**
- Record of Comm. Proceedings ... **RCP**

INFORMATION COLLECTED BY COMMITTEE FOR AND AGAINST PROPOSAL

- Appointments ... **Appt**
- Clearinghouse Rules ... **CRule**
- Hearing Records ... bills and resolutions
 - (**ab** = Assembly Bill) (**ar** = Assembly Resolution) (**ajr** = Assembly Joint Resolution)
 - (**sb** = Senate Bill) (**sr** = Senate Resolution) (**sjr** = Senate Joint Resolution)
- Miscellaneous ... **Misc**

Governor's Small Business Regulatory Review Board

May 29, 2007

Secretary Roberta Gassman
Department of Workforce Development
201 E. Washington Avenue
P.O. Box 7946
Madison WI 53702

Re: DWD – 56 Child Care Subsidy Rates
CR 07-030 – Wisconsin Administrative Register No. 616

Dear Secretary Gassman:

Wisconsin 2004 Act 145 created the Small Business Regulatory Review Board (SBRRB) to serve as a voice for small businesses as defined in Wis. Stats. 227.114(1). The SBRRB's statutory authority for review of new rules is contained in 227.14(2g) and for emergency rules in 227.24(3m). The SBRRB respectfully submits this letter to the Wisconsin Department of Workforce Development (DWD) following the SBRRB's review of DWD – 56 Child Care Subsidy Rates. The SBRRB's comment on this rule are based on the testimony heard by both representatives of DWD and the child care industry at the board's May 14, 2007 meeting.

Rules come before the SBRRB in a number of ways. Often the department or agency promulgating a rule determines that the rule will have a significant economic impact on a substantial number of small businesses and seeks SBRRB's comment on its analysis. In this case, DWD did not believe that such an economic impact existed. Representatives of affected industries may also bring rules before the SBRRB where they believe that a department's analysis of economic impact is lacking in some regard. As noted above, that is the situation with DWD – 56, Child Care Subsidy Rates.

The function of the SBRRB is to assure each regulatory agency's compliance with the statutory administrative rulemaking requirements relating to small businesses economic impacts contained in Chapter 227. DWD published the emergency rule on January 22, 2007 as a result of the substantial deficit projected in the child care subsidy program for fiscal year ending 2006-2007.

The SBRRB understands that the rule was promulgated to address the budget shortfall. The need to address the shortfall and the mechanism for doing so, are policy matters beyond the purview of the SBRRB. The SBRRB is only concerned with determining whether DWD considered the impact of the rule on small businesses.

The SBRRB provides the following submission to DWD based on a majority vote of the members:

1. The analytical approach and methodologies used by the DWD in making its determination that the rule would not have a significant impact on a substantial number of small businesses was lacking.

The SBRRB heard testimony from child care providers and other representatives of the industry questioning whether DWD had performed a thorough analysis of the rule's economic impact on small business. Additionally, the SBRRB also heard from representatives of DWD explaining DWD's position that the rule would not have a significant economic impact on a substantial number of small businesses. The SBRRB concurs with the child care industry that the shortcoming of DWD's analysis was its focus on statewide figures and averages rather than a focus of the child care subsidy rate freeze for each of the four rate zones. In DWD's analysis of the rule's economic impact, DWD divided the total estimated cost savings from implementation of the rule by the total number of statewide small businesses in order to estimate the average loss of revenue to each small business. This form of analysis ignores the fact that small businesses in different rate zones would lose revenue at different rates, and thus would be impacted at varying levels.

2. The DWD should re-evaluate the methodology and data sources it used in its initial analysis.

The SBRRB understands that additional resources (including other child care market surveys) are available which may have provided additional information to DWD to permit it to more thoroughly analyze the impact of the rule on small business. The SBRRB is not predetermining the outcome of this re-evaluation. If alternative sources of data are less reliable than those used by DWD, the SBRRB can accept that conclusion as long as it is based on a thoughtful and an objective analysis. If the DWD determines that these alternative sources provide for a more thorough analysis than that originally was done by DWD. The DWD should conduct the analysis and provide a response to the SBRRB's comments by June 30, 2007. A copy of this report should also be provided to the legislature with the final rule draft as required in Wis. Stats. 227.19(3)(g).

In conclusion, it is the intention of the SBRRB not to delay any agency's rulemaking process but to ensure the impact of this rule, or any rule, is thoroughly and accurately analyzed by the Department. The SBRRB looks forward to the receipt of the DWD's response by June 30, 2007.

As Chairman of the SBRRB, I appreciate DWD's willingness to study the effects of this rule on small business so that DWD, the SBRRB and the legislature can have an accurate picture of how small businesses will be affected by this rule.

Sincerely,



Richard E. Petershack, Chairman
Governor's Small Business Regulatory Review Board

Cc: Ron Sklansky, Joint Legislative Council
Nicholas Alexander, Strategic Analyst, AFSCME
Janel Hines, Executive Assistant, DWD
Laura Saterfield, Section Chief, Child Care Section
Jennifer Jirschele, Small Business Regulatory Coordinator, DWD ✓
Carol Dunn, Small Business Ombudsman, Commerce



Governor's Small Business Regulatory Review Board

July 19, 2007

Secretary Roberta Gassman
Department of Workforce Development
201 E. Washington Avenue
P.O. Box 7946
Madison WI 53702

Re: DWD – 56 Child Care Subsidy Rates
CR 07-030 – Wisconsin Administrative Register No. 616

Dear Secretary Gassman:

On behalf of the Small Business Regulatory Review Board I acknowledge receipt of your response to the Board's request for additional analysis of the small business impact of DWD – 56 Child Care Subsidy Rates.

I think you will agree that the analysis performed at the request of the Small Business Regulatory Review Board provides a much clearer picture of the department's reasoning and assumptions regarding the small business economic impact than the analysis that was prepared for the Notice of Hearing. The five page response is a significant improvement in the department's efforts to provide a methodology to support their determination of the economic impact of this rule on small business. The department's response reiterates the position of those persons testifying before the Board that the subsidy rate freeze will indeed have a greater impact on Milwaukee County child care providers. It is this type of small business economic impact analysis that is a keystone in any agency's decision-making process. I believe the Milwaukee County child care providers would have had a better understanding of their projected revenue loss had this form of analysis been provided in the Notice of Hearing. In turn, the department would have received an increased number of comments from these child care providers who represent 43.29% of the statewide total of child care subsidy.

I understand and accept that your agency is unable to provide a regional impact due to the lack of intra-state regional data that is both reliable and translatable by region. In future rulemaking in which the department lacks the necessary data to make an accurate determination regarding economic impact, it is advisable that the department err on the side of caution in assessing the impact of the rule on small business. In addition, the Board encourages the department to make their determinations about economic impacts known at the time of Notice of Hearing. In doing so, the voice of small business can be heard during the public comment period. As the childcare industry ripples through the rest of Wisconsin's economy in creating jobs and boosting the business economies of the retail and service sectors, we need to hear the voice of Wisconsin's child care providers during the public comment period.

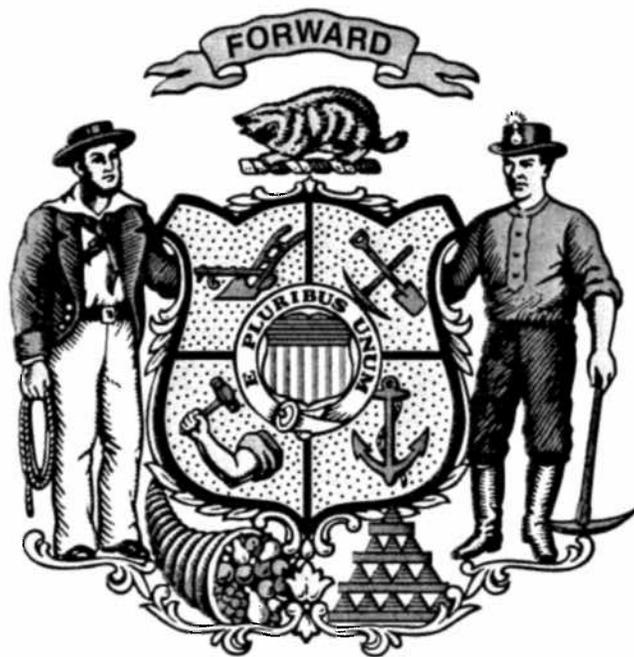
The Board looks forward to future review and comment on rules impacting small business. On behalf of the Board, I thank you for response to the Board's comments on DWD 56 – Child Care Subsidy Rates.

Sincerely



Richard E. Petershack, Chairman
Governor's Small Business Regulatory Review Board

Cc: Ron Sklansky, Joint Legislative Council
Ed Rathman, Strategic Analyst, AFSCME
Janel Hines, Executive Assistant, DWD
Laura Saterfield, Section Chief, Child Care Section
Jennifer Jirschele, Small Business Regulatory Coordinator, DWD ✓
Small Business Regulatory Review Board Members
Carol Dunn, Small Business Ombudsman, Commerce



Hearing Summary

Proposed Rules Relating to Child Care Rates DWD 56 CR 007-030

Date?

A public hearing was held in Madison on May 7, 2007.

269 people commented or registered against the proposed rules
0 commented in support of the proposed rules
3 observed for information only

The following commented or registered against the proposed rules:

1. Richard Abelson, Executive Director
AFSME District Council 48
Shorewood
2. Nicholas Alexander, Research Analyst
Child Care Providers Together/AFSCME
Madison
3. George Hagenauer, Acting Director
4-C Community Coordinated Child Care, Inc.
Springdel Township
4. Oma Vic McMurray
Madison
5. Sherry Bishop
Arcadia
6. Silke O'Donnell
Madison
7. Genniene Lovelace-Michel
Sauk City
8. Earlean Collier
Milwaukee
9. Towanda Ford
Milwaukee
10. Brenda Daniel Czacak
Merrill
11. Virginia Pratt
Milwaukee
12. Patricia Wooldridge
Oregon
13. Julie Shackelford
Berlin
14. Mary Bankhead
Milwaukee
15. Sharon Garcia
Beaver Dam
16. Bonnie Schultz
Stone Lake
17. Carolyn Klinglesmith
Madison
18. Billie Holzer
Trempealeau
19. Patricia Miller
Fond du Lac
20. ShonDa Morgan
Milwaukee
21. Delores Neal
Milwaukee
22. Rita Wagner
Blair
23. Michelle Gunther
Melrose
24. Tina Lee
Taylor

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| 25. Jennifer Hessler
Blair | 26. Denise Doerr
Eltrick |
| 27. Travis Pellowsk
Blair | 28. Brent Miller
Hixton |
| 29. Jeanene Bishop
Ettrick | 30. Amber Smith
Blair |
| 31. Joe Stevens
Whitehall | 32. Wade Noren
Ettrick |
| 33. Kelly Wilson
Taylor | 34. Amy Ready
Blair |
| 35. Justin Shramek
Blair | 36. Jessica Ellingson
Black River Falls |
| 37. Debra Belanger
Mosinee | 38. Danna Schroeder
DeForest |
| 39. Pamela Lake
Stevens Point | 40. Myra Stumlin-Oyer
LaCrosse |
| 41. Michelle Hansen
LaCrosse | 42. Charlotte Randolph
Milwaukee |
| 43. Lapricia Hooks
Milwaukee | 44. Cari Swensen
Arpin |
| 45. Sarah Koeshall
Madison | 46. Roxann Zastrow
Algoma |
| 47. Theresa Hutchinson
Milwaukee | 48. Tanisha Boston
Milwaukee |
| 49. Dorothy Hopkins
Milwaukee | 50. Heather Long
Milwaukee |
| 51. Beverly Spiva
Milwaukee | 52. Debra Taylor
Milwaukee |
| 53. Barbara Kelley
Milwaukee | 54. Alisha Jordan
Milwaukee |
| 55. Angelina Zapata
Milwaukee | 56. Ethel Glass
Milwaukee |
| 57. Andrea Edwards
Milwaukee | 58. Dora Martinez
Milwaukee |
| 59. Sonia Ruiz
Milwaukee | 60. Denita Sublett
Milwaukee |

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|--------------------------------------|---|
| 61. Quasheba Knight
Milwaukee | 62. Jerrica Bluntson
Milwaukee |
| 63. Shantrel Lockett
Milwaukee | 64. Carmen Mudd
Milwaukee |
| 65. Twana Kingbryant
Milwaukee | 66. Tarina Ruffin
Milwaukee |
| 67. Barbara Crawford
Milwaukee | 68. Ebony Oglesby
Milwaukee |
| 69. Tammy Schultz
Brookfield | 70. Kathryn Wahl
New Berlin |
| 71. Angela Sepulveda
Madison | 72. Brandee Crabb
Madison |
| 73. Nancy Bradley
Madison | 74. Kelly Murphy
DeForest |
| 75. Lanae Pete
Fitchburg | 76. Sue McNamara
Monona |
| 77. Stacy Dyson
DeForest | 78. Emily Curtis
Mount Horeb |
| 79. Edna Young
Racine | 80. Linda Yarbrough
Racine |
| 81. Kevin Kaleck
Kenosha | 82. Sue Kaleck
Kenosha |
| 83. Norma Merten
Kenosha | 84. Sheryl Sabur
Kenosha |
| 85. Judith Edwards
Beloit | 86. Debbie Litzler
Beloit |
| 87. Kathryn Wu
Janesville | 88. Michelle Staver
Janesville |
| 89. Betty Christianson
Janesville | 90. Joan Schneider
Sauk City |
| 91. Jane Beloungy
Prairie du Sac | 92. Charles Wilson
Reedsburg |
| 93. Lisa Witt
Reedsburg | 94. Stephanie Scholz
Richland Center |
| 95. Linda Bowe
Chippewa Falls | 96. Sandy Schley-Zelm
Chippewa Falls |

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| 97. Wanda Goyette
LaCrosse | 98. Wanda Marick
LaCrosse |
| 99. Julinna Canik
Park Falls | 100. Deborah Rucinski
Wisconsin Rapids |
| 101. Vicki Voth
Eau Claire | 102. Sheila Gerrits
Chippewa Falls |
| 103. Julie Cox
Brodhead | 104. Vonda Lange
Piatteville |
| 105. Joanne Esser
Oconomowoc | 106. Stephanie Colvin
Watertown |
| 107. Amy Mustache
Hayward | 108. Heidi Bignell
Durand |
| 109. Tammy Cooper
Ladysmith | 110. Kelly Kuhn
Port Edwards |
| 111. Sandra Nicolini
Adams | 112. Stacy Olds
Nekoosa |
| 113. Suzne Brooks
Green Bay | 114. Tammy Dannhoff
Oshkosh |
| 115. Becki Schillinger
Ashland | 116. Jammie Schiller
Pittsville |
| 117. Jayme Prein
Colby | 118. Jolene Dankemeyer
Port Edwards |
| 119. Amanda Blaskowski
Marshfield | 120. Nicole Kersten
Wausau |
| 121. Tracy Williams
Omro | 122. Rebecca Kirkpatrick
Shullsburg |
| 123. Nicole Galbreath
Nekoosa | 124. Jeannie Reinhardt
Arkansaw |
| 125. Brenda Danielczak
Merrill | 126. Nancy Smazal
Waupaca |
| 127. Shawn Lesperance
Manitowoc | 128. Pam Clark
Wautoma |
| 129. Katherine Johnson
Almond | 130. Gina Vitale
Tomahawk |
| 131. Valerie Steger
Berlin | 132. Carrie Falk
Berlin |

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| 133. Jodi Knutson
Nekoosa | 134. Jennifer Rodriguez
Independence |
| 135. Holly Blumke | 136. Demere Kentry |
| 137. Bertile Cotton | 138. LaToya Hardy |
| 139. Angela Arnetton | 140. Irene Colburn |
| 141. Grant Ebnetter | 142. Phetsamone Olk |
| 143. Kelly Gomez | 144. Allan Legler |
| 145. David Steger | 146. Sarah Klawitter |
| 147. Amanda Shakelford | 148. Karen Homan |
| 149. Rochelle Newman | 150. Emily Hefko |
| 151. Anthony Pulera | 152. Della Daniel |
| 153. Lillie Daniel | 154. Louise Pulera |
| 155. Katie Burzynski | 156. Cathy Brown |
| 157. Renee Solis | 158. Kristina Steiner |
| 159. Kara NeVearux | 160. Nicole Brantner |
| 161. Laura Knaapen | 162. Nancy Kopach |
| 163. Corey Baas | 164. Heather Nanke |
| 165. Lisa Backman | 166. Joe Knaapen |
| 167. Ruthie Jines | 168. Terry Dubinsky |
| 169. Tina Bidlingmaier | 170. Sherri Schulner |
| 171. Linda Hoff | 172. Sandra Worachek |
| 173. Tara Holm | 174. Cheryl Dura |
| 175. Josephine Davis | 176. Shauna Prather |
| 177. Tammy Maki | 178. Sandra Schley-Zelm |
| 179. Tina Greeley | 180. Riley McNurlin |
| 181. Annette Louis | 182. Janice Shelby |
| 183. Sandie Granger | 184. Tammy Harris |

- 185.M. Binkley
- 187.Amanda Wertz
- 189.Monica Benoit
- 191.Nicole Hoover
- 193.John Miller
- 195.Melissa Meade
- 197.Sheryl Ann Stovall-Sabur
- 199.Jason Foster
- 201.Melissa Miller
- 203.K. Perkins
- 205.Debbie Bland
- 207.Christina Murray
- 209.Carolyn Mathers
- 211.Kathline Jones
- 213.Terese Kolodzieg
- 215.Megan Bongarten
- 217.Gabriella Wade
- 219.Bertha SoJozono
- 221.Adriana Anghel
- 223.Grace Amandes
- 225.Lauren Casaccio
- 227.Miriam Carey
- 229.Robert Ralph
- 231.Katherine Connor
- 233.Ginger Cervantez
- 235.Kathleen Jensen
- 237.Diane Baskette
- 186.A. Schramm
- 188.Jamie Hill
- 190.Helena Fenters
- 192.Andrea Miller
- 194.Meloney Green
- 196.Molly Calderon
- 198.Jamella Jackson
- 200.Morgan Williams
- 202.Reginald Handy
- 204.Kathy Travis
- 206.Terese Hopkins
- 208.Joseph Daly
- 210.Mollie Firestone
- 212.Clara Rose Thornton
- 214.Susan Ewald
- 216.Julia Boebel
- 218.Margie Omotosho
- 220.Katherine Lane
- 222.Tim Griffin
- 224.Susie An
- 226.Diane Connolly
- 228.Thomas Wuellner
- 230.Atao Kochi
- 232.Kerri Kratochvil
- 234.Chul Kam
- 236.Peggy Dinkel
- 238.Nahrinj Shamoon

239. Mary Cunningham	240. Sandra Lawrence
241. T. Holland	242. Renee Tawa
243. Erica Battaglia	244. Jennifer Goldfarb
245. Charles Aloy	246. Sara Allen
247. Fidelina Manvis	248. Johnny Powell
249. Nick Adam	250. Brooke Williams
251. Keith Browne	252. Barb Domala
253. Maureen Thul	254. Karim Babur
255. Jacqu Day	256. Paula Williams
257. Norma Barker	258. Linda Varnell
259. Reader Gatson	260. Gloria Clark
261. Earline Gates	262. Persheeka Stoval
263. Helena Steele	264. Mickel Stovall
265. Breshenda Wade	266. Lavetta Arringta
267. Rejennia Adams	268. Elena Gruzten
269. Duanna Gamell	

The following observed for information only:

Brenda Mahnke
Beaver Dam

Jeani Meehan, KinderCare Director
Madison

Aisha Salleh, AFSCME
Milwaukee

Summary of comments by child care providers, parents, and other supporters listed above as #4 to #269

- We oppose the emergency order freezing 2007 reimbursement rates at 2006 levels.
- We are dedicated to providing the highest quality of care. These increased reimbursements are necessary to cover the costs of providing the highest quality of care.
- If the scope of the budget deficit would have been acknowledged much earlier than it was, less harmful initiatives could have been developed.
- DWD should develop deficit reduction plans that do not balance the budget on the backs of providers and the children and families that Wisconsin Shares is supposed to support. If reimbursement rates are frozen, a significant number of providers may be forced out of business. Remaining providers may have to stop caring for Wisconsin Shares children.
- If high quality providers can't afford to keep Wisconsin Shares children, the children will wind up in lower quality settings. These children need high quality care.
- Parents have difficulty paying an increased copayment.
- There should be more money for child care.

Department response: In January, the Department estimated that the child care program would have a fiscal year deficit of \$46 million. The deficit issues are due to flat federal funding, rising caseload, and increased provider costs. In April, the Legislature appropriated an additional \$30 million for the program in 2007 Wisconsin Act 5. The emergency rule has been instrumental in the Department's ability to address the remaining \$16 million deficit. Moving into state fiscal year 2008, the Department continues to be challenged with potential deficit issues for the child care program. The rule provides that provider rates will not be adjusted for calendar 2007 to continue to address the deficit issues. Further funding issues will be determined by the Legislature.

The Department does not have authority to set rates based on quality of care, other than the 10% rate enhancement for accredited providers. Rates are based on the provider's level of regulation.

The Department does not control how much money is appropriated for child care.

Richard Abelson, AFSCME

Wisconsin Child Care Providers Together/AFSCME represents over 7,000 family child care providers and AFSCME Local 255 has represented child care workers in several centers for over 30 years.

We oppose this rule change that would freeze maximum reimbursement rates and believe that rates should be adjusted according to the results of the market survey done in 2006. The survey showed only 7 counties out of 78 counties and tribes where market rates did not rise. These rising rates reflect the rising costs of providing care.

We believe that the rate increases would be substantially higher if the data collection process were improved. DWD has identified concerns about data collection, including inaccurate provider data reporting, inaccurate local agency data entry, providers submitting hourly rates instead of weekly rates, providers submitting part-time rates instead of full-time rates, private pay family information not provided, and low return rate for the survey. We believe the low rate

of return is a particular problem because providers who do not participate in Wisconsin Shares are less likely to fill out the survey. Also, various fees may not be reflected in the survey.

The ability and willingness of providers to provide subsidized care is directed affected by the reimbursement rates. If subsidized children are going to receive care that is comparable to nonsubsidized children, the reimbursement rates must keep pace with market rates.

Department response: The annual child care rate survey is administered by local agencies and is funded as part of their Child Care Administration Contract. These agencies print the Department-prepared survey, mail it to providers, collect the responses, and forward the results to the Department. The Department has long discussed both internally and with the larger child care community, the shortcomings of the annual rate survey. The concerns center on the following factors:

- Response rates. Counties and tribes are actively encouraged to work for a response rate of at least 80 percent. However, there is a great deal of variability from county to county. In Milwaukee County, for 2005, 977 surveys were sent to family providers and 653 were returned for a response rate of 67 percent.
- Number of useable responses. Not all responses are eligible for inclusion in the rate survey. To be included, a response must indicate that at least 25 percent of children served are private pay. This requirement is necessary so the survey is more accurately assessing the private pay market, which is the price structure the program seeks to support. In 2005, of the 653 surveys returned from Milwaukee County family providers, only 108 met this threshold.
- Lack of verification that providers actually charge the rates they indicate on the survey. Providers have vested interest in over-reporting rates to increase the maximum county rates.
- Lack of verification that parents actually pay the rates that providers indicate on the survey. The program is intended to assist low income working parents in accessing the same regulated care that moderate income parents can purchase. We do not know what moderate income parents are paying for child care.
- Concern that, in some areas of the state, the subsidy is such a large share of the market that the subsidy is actually setting the market rate and middle income parents cannot afford to buy regulated care in those markets.

In short, the annual market rate survey has flaws; however, at this point, it is the most reliable data available.

Provider rates will be adjusted to the annual market rate survey when budget limitations allow. Provider rates will not be adjusted for calendar year 2007.

Nicholas Alexander, AFSCME

We believe the rate freeze will have a significant impact on a substantial number of child care businesses. The reimbursement rates are determined by a system of zones that reflect the percentage of the population that lives in an urban area. The most urban zone, Group D, contains over 65% of all children served by Wisconsin Shares and over 65% of child care small businesses participating in the program. The average 2006 market rate in Group D increased by 7.4% from 2006 to 2007.

In the analysis to the proposed rule, the Department states that the rule would not have a significant economic impact on a substantial number of small businesses. To make this

determination, the Department divided the total estimated cost savings from implementation by the total number of child care small businesses statewide to estimate the loss of revenue to each child care small business. The average decreased revenue from the child care subsidy program to a provider due to not increasing the child care subsidy maximum rates is \$1,080 or 2.8%. The percentage decrease in overall revenue to a provider will be significantly less than 2.8% due to revenue from private pay families and copayments from families receiving child care assistance. According to the UW-Extension's Wisconsin Child Care Research Partnership in 2001, there were 190,000 young children in out-of-home regulated child care, of whom 40,000 (21%) were funded by the subsidy. On average, we would expect providers, including those who are small businesses, to experience a decrease in overall revenue of about 0.5%.

The Department's analysis does not take into account small businesses in different rates zones would lose revenue and produce cost savings at different rates. We believe the rule will have a significant economic impact on a substantial number of small businesses and urge the Department to do a full analysis of that impact.

Department response: The Department's report to the Small Business Regulatory Review Board dated June 29, 2007, is attached.

George Hagenauer, Dane County 4-C

Setting an inaccurate maximum reimbursement rate causes deficits in local program budgets. In group centers, those deficits are often passed through to private pay families. This increases the rates for all and in future years also increases the maximum reimbursement rate via the formula. A rate freeze will not benefit the state in sustaining affordable care for its children.

Mr. Hagenauer submitted additional comments on the child care program that are not directly related to this rule. The Department is reviewing the comments and will take them under advisement.

Department response: The Department agrees that not adjusting rates this year may lead to a larger than average increase when rates are next adjusted.

Department of Workforce Development
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P.O. Box 7946
Madison, WI 53707-7946
Telephone: (608) 266-3131
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State of Wisconsin
Department of Workforce Development
Jim Doyle, Governor
Roberta Gassman, Secretary

June 29, 2007

Mr. Richard E. Petershack, Chairman
Governor's Small Business Regulatory Review Board
c/o Wisconsin Department of Commerce Small Business Ombudsman
201 W. Washington Avenue, 5th Floor
Madison, WI 53707

Dear Mr. Petershack:

This is in response to your May 29, 2007 letter requesting a response by June 30, 2007.

On May 14, 2007, the Department met with the Small Business Regulatory Review Board regarding emergency and proposed permanent rules related child care subsidy maximum rates. The amendment to DWD 56, labeled CR 07-030, suspends a provision in DWD 56 that would have required a maximum rate increase for calendar year 2007. As you note in your letter, the Department took the action to freeze rates for calendar year 2007 in January, in light of projected deficits of \$46 million for the current state fiscal year, and a structural deficit in the program moving into the next biennium. If the deficit is not resolved, the program could cease operation at the point that authorized funds are fully expended.

In its analysis of the impact of the proposed rule, the Department indicated that the rule "will affect small businesses but will not have a significant economic impact on a substantial number of small businesses." This statement rested on the Department's definitions adopted at the direction of the Small Business Regulatory Review Board. The pertinent definitions are:

"Significant economic impact" means the rule increases overall expenses of small businesses by more than 5% per year or the rule decreases overall revenue of small businesses by more than 5% per year.

"Substantial number" means more than 25% of the businesses affected by the scope of the rule.

Because the rule does not, in the Department's estimation, exceed the threshold of decreasing revenue by more than 5% for more than 25% of the state's regulated child care businesses, small or large, the Department was not required to prepare an analysis of economic data discussing how regulated child care businesses would be impacted and the regulatory steps the Department would take to reduce that impact.

1) In your letter of May 29, you indicate that you believe the Department erred in focusing on statewide figures and averages rather than a focus on the child care subsidy rate freeze for each of the four rate zones.

If we assume that the proposed amendment saves money and, as you request, produce a region-by-region analysis of the impact of those savings, we have very few tools for describing, much less analyzing, the impact. This results from the fact that we lack intra-state regional data on the non-subsidized portion of the regulated child care industry, which constitutes an estimated 79 percent of the industry. Lacking these data, the Department cannot provide a 4-region analysis of impact on the industry.

We can discuss the distribution of the change in program spending that would have occurred if there were sufficient funding available to provide the increase identified in current law.

Attached is Table 1 entitled "Draft Changes to 2006 Maximum County Rates". The table draws from the county and tribe-administered 2006 rate survey. This table shows the possible county-by-county, and age-group-by age-group changes to average maximum county rates that would have occurred had rate increases gone into effect. These rate changes are then summarized into a county-by-county "Average Increase". A few comments from these data are:

- The highest average percentage increase would have occurred in Grant County, a Region B county. However, since Grant County has very few children utilizing the subsidy (579 in 2006), and a relatively low average cost per child (\$1500.60 in 2006--\$1803 below the state average of \$3303.61), the likely cost to the program and benefit to providers and the county would have been minimal compared to larger counties with higher 2006 costs and higher numbers of children. We do not believe that there would be a significant economic impact on a substantial number of small child care businesses in Grant County.
- Some counties would have experienced a decrease in average rates, led by Green Lake with an average decrease of 8.56 percent.
- An increase in maximum county rates may or may not be followed by an increase in provider prices. If parents are choosing providers whose prices are lower than the maximum county rates, an increase in maximum county rates will not initiate an increase subsidy payments.
- The county average is created for discussion and comparison purposes; it has no meaning in calculating reimbursements since rates are age-specific. The actual costs to the program are driven more by the number of children in each rate grouping than by the average county cost.

Attached are a series of tables (Tables 2 through 6) drawn from 2006 expenditure reports. They are an attempt to look at the impact of a rate freeze on Region D, since we can agree with the representatives of organized family child care providers that any "savings" from the proposed amendments will come from the providers and regions that would have seen the greatest growth in revenue under the rate survey, and that those providers are concentrated in Region D. We can infer the following from these tables:

- In terms of total payments, 9 of the top 10 local jurisdictions receiving Wisconsin Shares Child Care Subsidy funding are counties in Region D (Table 2)
- In Regions A, B, and C, the percentage of the state's subsidized children exceeds the percentage of the state's subsidy dollars. Region D has a smaller percentage of the state's subsidized children than subsidy dollars: (Tables 3 and 4):
 - Region A: Six percent of subsidized children and 3 percent of subsidy dollars;
 - Region B: Nine percent of subsidized children and 5 percent of subsidy dollars;
 - Region C: Thirteen percent of subsidized children and 9 percent of subsidy dollars;
 - Region D: Seventy-two percent of subsidized children and 82 percent of subsidy dollars.
- Region D is similar to the rest of the state in the proportion of subsidy dollars paid to the various types of child care providers. In both Region D and Wisconsin as a whole, 67 percent of funds are paid to Licensed Group Child Care programs.
- Region D differs from the rest of the state by having more subsidized children per participating provider. See Table 6.

The only difference between Region D and other regions suggesting a greater impact on Region D from a freeze in the Maximum County rates is that Region D has more children on the subsidy per participating provider. This suggests that Region D providers who serve subsidized children may get a greater proportion of their revenue from families on the subsidy. This conclusion cannot be firmly

established, since we do not have data on the overall size of the regional market and the relative capacities of providers in the regional market.

Broader Market Issue—School Lunch Data

Data on the School Lunch Program may be analyzed to infer the availability of a private child care market. The existence of a private market would mean that the impact on a provider's revenue from this rate freeze would be less than the regional "savings" rates, since the subsidy would be a smaller part of the provider's customer base.

The Department of Public Instruction collects data on participation in free and reduced school lunches by school and county. Income eligibility for the program School Lunch program is very similar to income eligibility for the Child Care Subsidy. A summary of the information for the 2005-2006 school year is shown in Table 7. That table shows that, 30 % of students participate in free and reduced lunches. Region B and C have participation rates below the statewide average (28% and 23 % respectively). Regions A and D have rates slightly higher than the statewide average (34% and 33%, respectively). A higher rate would indicate that more children were eligible for and participating in this income-tested program and could relate to a smaller private pay child care market. Table 8 shows that, within Region D, only Milwaukee County exceeds the statewide average by more than two percentage points.

This suggests that, outside of Milwaukee County, many families with children would need to participate in a private pay child care market. In turn, we would expect that providers are obtaining some substantial portion of their revenue from private pay customers.

Broader Market Issue—Milwaukee County:

Many have spoken to the lack of a private pay child care market in Milwaukee County. There is research on the issue in addition to evidence from the School Lunch Program. In 1999, John Pawasarat and Lois Quinn of UW-Milwaukee's Employment and Training Institute indicated that subsidy rates were higher in Milwaukee, even without the co-payment, than providers were charging unsubsidized families. The study is named "Impact of Welfare Reform on Child Care Subsidies in Milwaukee County: 1996-1999." Since then, maximum subsidy rates have increased regularly without reference to economic forces. There are a number of providers who serve only children on the subsidy. This phenomenon poses great challenges for the Department in surveying providers to find the true private market rate in Milwaukee County. It also leaves many concerned that moderate income parents are unable to purchase regulated child care in Milwaukee County. The 2006 average cost per subsidized child served for Milwaukee County was \$4,227.07, which is \$923.46 above the state average. See Table 2.

Milwaukee County also shows a greater concentration of subsidized children among participating providers. Table 6 shows that, statewide, there are 13 children per participating provider. Region D shows 17 children per participating provider. Within Region D, Milwaukee County shows 23 subsidized children per participating provider location.

While Milwaukee County providers, like providers statewide, continue to be free to set their prices without regard to the maximum subsidy rates affected by CR 07-030, the fact is that their overall revenue will be more directly impacted by these amendments than those of most providers, family and group, in the state. Consequently, the Department agrees that, in Milwaukee County, a rate freeze in Wisconsin Shares will have an impact on overall provider revenues, large and small, that is not likely to be cushioned by revenues from the private pay market. While providers can raise rates beyond the

maximum rates covered by the subsidy and require parents to pay the difference, many parents will make cost-conscious choice to seek less expensive care.

For purposes of this analysis, then, the Department agrees that most regulated child care providers in Milwaukee will experience a lost revenue increase as a result of this rule. Many of those providers have a large number of children whose child care fees are largely paid by the Wisconsin Shares Child Care Subsidy. Very few of those providers have a substantial number of private pay families. Those providers may see a loss in revenue growth approaching the savings from this rule. Based on the annual market rate survey, **the average loss of subsidy revenue growth will be 1.77% for Milwaukee County providers whose entire client base is children from families receiving the Wisconsin Shares Child Care Subsidy, assuming that the providers do not charge the families an additional amount. See Table 1. If we factor in information regarding the proportion of children in each age group and care type in 2006, we see an average loss of subsidy revenue growth of 4.79% for Milwaukee County licensed family providers as a result of the rate freeze. See Table 9.**

Broader Market Issue—Dane County: Unlike Milwaukee County, Dane County is believed to have a substantial private child care market. Average costs per child in 2006 in Dane County were \$3,895.51, which is \$591.91 above the statewide average. This belief is supported by School Lunch Program data that shows that schools in Dane County report that 22 percent of enrolled students participate in free and reduced price lunches. This compares to 30 percent statewide, suggesting that Dane County has a lower proportion of families eligible for Wisconsin Shares than does Wisconsin as a whole. Finally, Dane County providers participating in the subsidy care for an average of 12 subsidized children. Based on the annual market rate survey, **the average loss of subsidy revenue growth will be 3.75% for Dane County providers whose entire client base is children from families receiving the Wisconsin Shares Child Care Subsidy, assuming that the providers do not charge the families an additional amount. See Table 1. If we factor in information regarding the proportion of children in each age group and care type in 2006, we see an average loss of subsidy revenue growth of 4.05% for Dane County licensed family providers as a result of the rate freeze. See Table 9.**

Broader Market Issue—Region D:

Like Dane County, the remaining Region D counties (Brown, Eau Claire, Kenosha, La Crosse, Racine, Rock, Waukesha, and Winnebago) appear to have private pay child care markets. This is based on the School Lunch Program data for schools in the respective counties. See Table 8. There are no similar data for the Oneida Tribe. In each of these counties, the average cost per child is below the state average. The number of subsidized children per participating location does not exceed 17 for any of these counties.

Based on this analysis, the Department continues to assert that the rule change does not create a significant economic impact on a substantial number of businesses. That statement is carried through Region D as well as Wisconsin as a whole.

2) The SBRRB also indicated in its letter that there are additional information sources that the Department could use to permit a more thorough analysis of the impact of the rule on small business. The letter further indicated that, if alternative sources of data are less reliable than those used by DWD, the SBRRB can accept that conclusion.

The annual child care rate survey is administered by local agencies (counties and tribes) and is funded as part of their Child Care Administration Contract. These agencies print the Department-prepared survey, mail it to providers, collect the responses, and forward the results to the Department.

The Department has long discussed, both internally and with the larger child care community, the shortcomings of the annual rate survey. The concerns center on the following factors:

- a. Response rates. Counties and tribes are actively encouraged to work for a response rate of at least 80 percent. However, there is a great deal of variability from county to county. In Milwaukee County, for 2005, 977 surveys were sent to family providers and 653 were returned for a response rate of 67 percent.
- b. Number of useable responses. Not all responses are eligible for inclusion in the rate survey. To be included, a response must indicate that at least 25 percent of children served are private pay. This requirement is intended to get at the private pay market, which is the price structure the program seeks to support. In 2005, of the 653 surveys returned from Milwaukee County family providers, only 108 met this threshold.
- c. Lack of verification that providers actually charge the rates they indicate on the survey. Providers have vested interest in over-reporting rates to increase the maximum county rates.
- d. Lack of verification that parents actually pay the rates that providers indicate on the survey. The program is intended to assist low income working parents in accessing the same regulated care that moderate income parents can purchase. We do not know what moderate income parents are paying for child care.
- e. Concern that, in some areas of the state, the subsidy is such a large share of the market that the subsidy is actually setting the market rate and middle income parents cannot afford to buy regulated care in those markets.

To date, neither the Legislature nor the Department has invested in survey re-design to meet the above concerns. Moving the annual rate survey from counties and tribes to other entities, or substantially re-designing the content would require amendment to DWD 56.06.

In short, the survey has flaws. At this point, however, the annual market rate survey appears to be the most reliable data available for its purpose, since it is the only data gathered on a statewide basis. In preparing this response, the Department asked the Resource and Referral Agencies servicing Dane County and Milwaukee County for advice on rate data. Both agencies responded that the information could be developed, but at a cost. It is not currently available. Data currently collected and developed by each Child Care Resource and Referral Agency for planning purposes are not readily translatable into rate data suitable for comparison from region to region.

In preparing this response, the Department reviewed Section 227.114, Wis. Stats. We note that, if there is a finding of a significant effect on a substantial number of small businesses, the Department is to consider a number of steps for reducing the regulatory impact of the rule on small businesses. Since this rule does not create or change regulatory requirements for businesses, none of the steps regulatory outlined in s.227.114(2) appear relevant.

Mr. Richard E. Petershock
June 29, 2007
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Thank you for the opportunity to respond to the Small Business Regulatory Review Board.

Sincerely,

A handwritten signature in black ink, appearing to read "Roberta Gassman", written in a cursive style with a long horizontal flourish extending to the right.

Roberta Gassman
Secretary

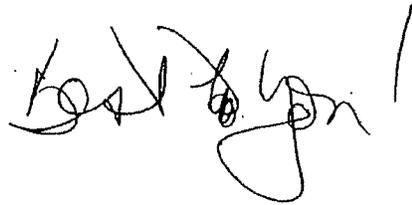
A handwritten note in black ink that says "Best to you!" written in a cursive style.

TABLE I

COUNTY NAME	GpRate0to2	GpRate2to3	GpRate4to5	GpRate6plus	FmRate0to2	FmRate2to3	FmRate4to5	FmRate6plus
ADAMS	27.60%	32.29%	26.78%	26.78%	9.09%	-4.55%	-9.09%	-4.31%
ASHLAND	-3.95%	-10.34%	-5.30%	-11.64%	-4.58%	2.27%	0.00%	0.00%
BARRON	-0.83%	0.00%	-4.31%	1.01%	-4.35%	-4.55%	-4.55%	-4.55%
BAYFIELD	-11.59%	-8.80%	-5.00%	-1.24%	12.00%	9.09%	0.00%	0.00%
BROWN	-1.84%	-2.80%	0.34%	3.80%	-2.10%	-4.55%	-1.19%	2.36%
BUFFALO	-9.09%	9.09%	9.09%	9.09%	-11.11%	-2.73%	-4.55%	-4.55%
BURNETT	1.45%	-4.76%	-4.76%	-20.83%	19.05%	18.18%	18.18%	18.18%
CALLUMET	4.68%	-9.09%	-8.50%	-2.10%	0.00%	-3.70%	-3.70%	-7.69%
CHIPPEWA	-2.47%	2.07%	2.14%	11.54%	-4.58%	0.00%	4.17%	4.17%
CLARK	23.97%	25.54%	29.19%	29.19%	-9.09%	-9.09%	-14.55%	-18.18%
COLUMBIA	14.20%	17.24%	10.71%	16.92%	3.05%	4.00%	8.33%	8.33%
CRAWFORD	0.36%	1.17%	-0.02%	-0.02%	-0.76%	0.00%	0.00%	12.27%
DANE	16.36%	15.00%	13.99%	8.57%	18.42%	13.96%	20.00%	15.87%
DODGE	8.02%	6.78%	0.00%	1.48%	16.67%	12.00%	16.67%	16.23%
DOOR	-2.47%	0.00%	-3.57%	3.85%	16.32%	8.80%	13.33%	12.50%
DOUGLAS	-8.82%	-13.88%	-10.87%	-5.30%	-10.00%	-7.41%	-7.41%	0.00%
DUNN	11.89%	0.00%	1.82%	11.57%	10.69%	0.00%	4.17%	4.17%
EAU CLAIRE	0.88%	-3.26%	-4.64%	-2.10%	-5.05%	-9.09%	-9.09%	-9.09%
FLORENCE	20.92%	21.53%	18.52%	19.05%	11.11%	11.11%	11.11%	11.11%
FOND DU LAC	-9.16%	-3.20%	-1.82%	-8.18%	-9.09%	-1.19%	-1.19%	0.66%
FOREST	-9.09%	-9.09%	-9.09%	-9.09%	11.11%	11.11%	1.85%	11.11%
GRANT	0.58%	0.58%	1.36%	5.05%	2.27%	2.27%	2.27%	2.27%
GREEN	-3.51%	-3.78%	-3.57%	3.85%	3.05%	0.00%	4.17%	4.17%
GREEN LAKE	-6.80%	-6.90%	-9.81%	-11.54%	3.05%	-15.20%	-13.33%	-18.33%
IOWA	-13.04%	10.49%	15.09%	20.10%	8.00%	13.64%	13.64%	13.64%
IRON	-9.09%	-9.09%	-27.27%	-27.27%	66.67%	0.00%	4.17%	4.17%
JACKSON	-5.84%	-8.76%	-8.76%	-14.24%	12.23%	13.64%	26.26%	26.26%
JEFFERSON	-4.88%	-3.70%	-2.20%	-0.83%	0.00%	8.52%	3.70%	7.69%
JUNEAU	19.57%	26.44%	23.02%	23.02%	-3.03%	-9.09%	-9.09%	-9.09%
KENOSHA	-5.02%	-5.50%	-3.41%	-0.29%	0.00%	0.00%	0.00%	3.23%
KEWAUNEE	3.62%	7.20%	3.33%	7.83%	-4.04%	-5.45%	-5.45%	-5.45%
LACROSSE	10.18%	-2.10%	-2.10%	-7.87%	-5.59%	-5.30%	-5.14%	3.90%
LAFAYETTE	-4.96%	-4.31%	-4.31%	-4.31%	0.00%	-9.09%	-9.09%	-9.09%
LANGLADE	-1.23%	-6.90%	-6.93%	-1.82%	3.05%	-8.00%	-8.33%	-8.33%
LINCOLN	0.08%	6.95%	8.81%	4.55%	-3.70%	0.00%	0.00%	0.00%
MANITOWOC	-3.03%	-2.36%	-2.36%	-6.90%	-9.09%	-3.70%	-7.41%	-3.85%
MARATHON	23.81%	6.08%	7.84%	11.11%	0.00%	3.70%	0.00%	0.00%
MARINETTE	-1.82%	-4.96%	-4.96%	-4.96%	10.69%	3.90%	3.90%	3.90%
MARQUETTE	-10.14%	-10.40%	-16.87%	-21.74%	-4.00%	-17.70%	-17.70%	-17.70%
MENOMINEE	-9.09%	0.00%	-4.17%	-4.36%	0.00%	11.11%	4.55%	0.00%
MILWAUKEE	11.64%	10.00%	8.89%	11.43%	5.28%	2.86%	9.09%	12.90%
MONROE	4.88%	7.81%	0.92%	0.00%	-14.12%	-13.42%	-13.42%	-9.09%
OCONTA	14.58%	8.00%	5.83%	10.43%	0.00%	9.09%	4.55%	-4.55%
ONEIDA	-1.23%	-5.45%	-0.83%	-0.83%	11.11%	3.90%	-0.43%	-0.43%
OUTAGAMIE	10.58%	12.73%	13.07%	13.78%	8.00%	7.41%	3.70%	3.85%
OZAUKEE	7.15%	16.11%	16.83%	17.24%	17.85%	14.38%	17.85%	17.85%
PEPIN	12.32%	4.49%	0.00%	4.36%	0.00%	2.27%	2.27%	2.27%
PIERCE	9.88%	15.88%	1.43%	-3.85%	3.05%	0.00%	4.17%	0.00%
POLK	6.07%	16.00%	8.33%	13.04%	0.00%	4.63%	4.63%	4.63%
PORTAGE	-0.53%	3.03%	4.58%	3.45%	-3.33%	7.41%	7.41%	3.85%
PRICE	-5.14%	-4.00%	-4.55%	-4.55%	0.00%	0.00%	0.00%	0.00%
RACINE	-4.43%	-1.07%	-8.82%	-4.79%	-0.83%	-2.86%	0.00%	6.45%
RICHLAND	-7.22%	-5.45%	-5.45%	0.00%	-8.40%	13.64%	13.64%	13.64%
ROCK	-3.80%	1.33%	-9.09%	-5.84%	-5.78%	-9.09%	-9.09%	-12.48%
RUSK	-9.09%	-9.09%	-9.09%	-9.09%	-9.09%	2.27%	2.27%	2.27%
SAUK	-7.41%	-1.59%	-6.25%	0.00%	7.53%	7.14%	11.11%	11.11%
SAWYER	-31.82%	-16.08%	-30.07%	-20.65%	-10.00%	-8.33%	-8.33%	-3.85%
SHAWANO	10.87%	19.82%	14.83%	14.83%	0.00%	13.64%	13.64%	13.64%
SHEBOYGAN	36.23%	36.00%	20.83%	22.81%	12.00%	27.27%	27.27%	27.27%
ST CROIX	5.82%	8.48%	15.38%	16.59%	10.00%	11.11%	11.11%	11.54%
TAYLOR	-9.09%	-8.00%	-4.17%	0.00%	0.00%	0.00%	0.00%	0.00%
TREMPEALEAU	6.06%	-0.83%	0.00%	4.36%	-4.00%	0.00%	0.00%	0.00%
VERNON	5.07%	-0.43%	-0.43%	0.00%	-4.55%	-9.09%	-9.09%	-13.64%
VILAS	25.00%	7.44%	4.55%	2.17%	4.00%	-1.24%	0.00%	0.00%
WALWORTH	2.96%	8.33%	7.32%	8.18%	-8.67%	0.00%	0.00%	3.85%
WASHBURN	-2.17%	-4.00%	-8.33%	-9.08%	0.00%	0.00%	0.00%	0.00%
WASHINGTON	5.82%	3.03%	1.31%	-3.45%	8.33%	16.87%	11.11%	15.38%
WAUKESHA	4.31%	5.50%	5.56%	9.14%	3.18%	2.86%	6.06%	10.97%
WAUPACA	-2.36%	-6.90%	11.57%	11.57%	3.31%	0.00%	0.00%	5.26%
WAUSHARA	2.90%	9.60%	10.00%	0.00%	0.00%	5.45%	4.55%	2.27%
WINNEBAGO	-9.88%	-0.93%	-5.55%	-5.33%	-9.09%	-5.72%	-2.10%	-5.59%
WOOD	-4.55%	2.55%	-2.55%	1.52%	-1.82%	-1.19%	-1.19%	-5.14%
Statewide %	1.91%	2.59%	1.02%	2.07%	2.22%	1.78%	1.95%	2.49%
Region D %	1.82%	1.64%	-0.49%	0.69%	-0.36%	-1.69%	0.85%	2.85%

Table 2
2006 Expenditures by County or Tribe

	Rate Region	Total Receipts Rank	2006 Expenditures for Jurisdiction Residents	Percent of Statewide Total	Authorized Children in 2006	Percent of Statewide Total	Cost/child	+/- State Average
Red Cliff Tribe	A	79	\$ 22,622.00	0.01%	46	0.05%	\$ 491.78	(\$2,811.82)
Stockbridge-Munsee		78	\$ 34,418.00	0.01%	35	0.04%	\$ 983.37	(\$2,320.24)
Sokaogon	A	77	\$ 73,467.00	0.02%	36	0.04%	\$ 2,040.75	(\$1,262.86)
Pepin	A	76	\$ 97,732.00	0.03%	56	0.06%	\$ 1,745.21	(\$1,558.39)
Florence	A	75	\$ 106,642.00	0.03%	56	0.06%	\$ 1,904.32	(\$1,399.29)
Menominee	A	74	\$ 128,903.00	0.04%	116	0.12%	\$ 1,111.23	(\$2,192.37)
Iron	B	73	\$ 155,930.00	0.05%	92	0.10%	\$ 1,694.89	(\$1,608.72)
Lac Du Flambeau	A	72	\$ 185,104.00	0.06%	161	0.17%	\$ 1,149.71	(\$2,153.89)
Vilas	A	71	\$ 193,628.00	0.06%	134	0.14%	\$ 1,444.99	(\$1,858.62)
Bayfield	A	70	\$ 202,480.00	0.06%	144	0.15%	\$ 1,406.11	(\$1,897.50)
Lafayette	A	69	\$ 211,854.00	0.07%	122	0.13%	\$ 1,736.51	(\$1,567.10)
Buffalo	A	68	\$ 212,914.00	0.07%	121	0.13%	\$ 1,759.62	(\$1,543.99)
Bad River	B	67	\$ 228,116.00	0.07%	130	0.14%	\$ 1,754.74	(\$1,548.87)
Jackson	B	66	\$ 250,455.00	0.08%	150	0.16%	\$ 1,669.70	(\$1,633.91)
Adams	A	65	\$ 251,644.00	0.08%	178	0.19%	\$ 1,413.73	(\$1,889.88)
Washburn	A	64	\$ 256,010.00	0.08%	179	0.19%	\$ 1,430.22	(\$1,873.38)
Taylor	A	63	\$ 264,043.00	0.08%	198	0.21%	\$ 1,333.55	(\$1,970.06)
Forest	A	62	\$ 264,791.00	0.08%	145	0.15%	\$ 1,826.14	(\$1,477.46)
Vernon	A	61	\$ 264,835.00	0.08%	200	0.21%	\$ 1,324.18	(\$1,979.43)
Clark	A	60	\$ 285,832.00	0.09%	187	0.20%	\$ 1,528.51	(\$1,775.09)
Rusk	B	59	\$ 291,024.00	0.09%	183	0.19%	\$ 1,590.30	(\$1,713.31)
Burnett	A	58	\$ 291,196.00	0.09%	177	0.19%	\$ 1,645.18	(\$1,658.43)
Price	A	57	\$ 297,127.00	0.09%	174	0.18%	\$ 1,707.63	(\$1,595.98)
Iowa	A	56	\$ 297,518.00	0.09%	196	0.21%	\$ 1,517.95	(\$1,785.66)
Crawford	B	55	\$ 312,334.00	0.10%	205	0.21%	\$ 1,523.58	(\$1,780.03)
Dunn	B	54	\$ 316,379.00	0.10%	227	0.24%	\$ 1,393.74	(\$1,909.87)
Waushara	A	53	\$ 324,496.00	0.10%	229	0.24%	\$ 1,417.01	(\$1,886.59)
Kewaunee	A	52	\$ 328,013.00	0.10%	174	0.18%	\$ 1,885.13	(\$1,418.47)
Marquette	A	51	\$ 337,011.00	0.11%	215	0.23%	\$ 1,567.49	(\$1,736.11)
Juneau	A	50	\$ 343,018.00	0.11%	228	0.24%	\$ 1,504.46	(\$1,799.14)
Green Lake	B	49	\$ 364,306.00	0.12%	196	0.21%	\$ 1,858.70	(\$1,444.90)
Richland	B	48	\$ 389,586.00	0.12%	215	0.23%	\$ 1,812.03	(\$1,491.58)
Marinette	B	47	\$ 405,200.00	0.13%	340	0.36%	\$ 1,191.76	(\$2,111.84)
Polk	A	46	\$ 558,377.00	0.18%	376	0.39%	\$ 1,485.05	(\$1,818.56)
Lincoln	B	45	\$ 584,638.00	0.19%	323	0.34%	\$ 1,810.02	(\$1,493.58)
Pierce	B	44	\$ 593,807.00	0.19%	264	0.28%	\$ 2,249.27	(\$1,054.34)
Langlade	B	43	\$ 601,333.00	0.19%	323	0.34%	\$ 1,861.71	(\$1,441.89)
Door	B	42	\$ 630,890.00	0.20%	274	0.29%	\$ 2,302.52	(\$1,001.09)
Grant	B	41	\$ 690,277.00	0.22%	460	0.48%	\$ 1,500.60	(\$1,803.00)
Trempealeau	A	40	\$ 719,014.00	0.23%	403	0.42%	\$ 1,784.15	(\$1,519.45)
Ashland	B	39	\$ 739,501.00	0.23%	363	0.38%	\$ 2,037.19	(\$1,266.41)
Barron	B	38	\$ 762,195.00	0.24%	477	0.50%	\$ 1,597.89	(\$1,705.71)
Shawano	A	37	\$ 764,853.00	0.24%	442	0.46%	\$ 1,730.44	(\$1,573.17)
Waupaca	B	36	\$ 774,207.00	0.25%	394	0.41%	\$ 1,964.99	(\$1,338.61)
Monroe	B	35	\$ 794,405.00	0.25%	436	0.46%	\$ 1,822.03	(\$1,481.58)
Oneida Tribe	D	34	\$ 850,045.00	0.27%	334	0.35%	\$ 2,545.04	(\$758.56)

Table 2
2006 Expenditures by County or Tribe

	Rate Region	Total Receipts Rank	2006 Expenditures for Jurisdiction Residents	Percent of Statewide Total	Authorized Children in 2006	Percent of Statewide Total	Cost/child	+/- State Average
Sawyer	A	33	\$ 850,429.00	0.27%	485	0.51%	\$ 1,753.46	(\$1,550.14)
St. Croix	B	32	\$ 855,948.00	0.27%	380	0.40%	\$ 2,252.49	(\$1,051.11)
Calumet	C	31	\$ 856,632.00	0.27%	339	0.36%	\$ 2,526.94	(\$776.67)
Green	B	30	\$ 915,603.00	0.29%	385	0.40%	\$ 2,378.19	(\$925.42)
Oconto	A	29	\$ 951,503.00	0.30%	455	0.48%	\$ 2,091.22	(\$1,212.39)
Columbia	B	28	\$ 982,884.00	0.31%	451	0.47%	\$ 2,179.34	(\$1,124.26)
Oneida	B	27	\$ 1,044,820.00	0.33%	414	0.43%	\$ 2,523.72	(\$779.89)
Sauk	C	26	\$ 1,201,400.00	0.38%	549	0.58%	\$ 2,188.34	(\$1,115.26)
Manitowoc	C	25	\$ 1,239,327.00	0.39%	577	0.61%	\$ 2,147.88	(\$1,155.73)
Walworth	C	24	\$ 1,394,114.00	0.44%	698	0.73%	\$ 1,997.30	(\$1,306.31)
Jefferson	C	23	\$ 1,409,186.00	0.45%	644	0.68%	\$ 2,188.18	(\$1,115.43)
Douglas	C	22	\$ 1,553,275.00	0.49%	672	0.70%	\$ 2,311.42	(\$992.19)
Ozaukee	C	21	\$ 1,828,758.00	0.58%	606	0.64%	\$ 3,017.75	(\$285.85)
Sheboygan	C	20	\$ 1,913,954.00	0.61%	847	0.89%	\$ 2,259.69	(\$1,043.92)
Portage	C	19	\$ 1,930,315.00	0.61%	808	0.85%	\$ 2,389.00	(\$914.60)
Chippewa	B	18	\$ 2,049,933.00	0.65%	874	0.92%	\$ 2,345.46	(\$958.15)
Fond du Lac	C	17	\$ 2,105,844.00	0.67%	1115	1.17%	\$ 1,888.65	(\$1,414.96)
Dodge	B	16	\$ 2,225,031.00	0.71%	1028	1.08%	\$ 2,164.43	(\$1,139.18)
Wood	C	15	\$ 2,390,790.00	0.76%	1219	1.28%	\$ 1,961.27	(\$1,342.34)
Washington	C	14	\$ 3,023,612.00	0.96%	1142	1.20%	\$ 2,647.65	(\$655.96)
La Crosse	D	13	\$ 3,750,165.00	1.19%	1629	1.71%	\$ 2,302.13	(\$1,001.48)
Marathon	C	12	\$ 4,143,087.00	1.32%	1667	1.75%	\$ 2,485.36	(\$818.25)
Eau Claire	D	11	\$ 4,168,112.00	1.32%	1519	1.59%	\$ 2,743.98	(\$559.62)
Outagamie	C	10	\$ 4,493,774.00	1.43%	1684	1.77%	\$ 2,668.51	(\$635.09)
Winnebago	D	9	\$ 5,700,510.00	1.81%	2061	2.16%	\$ 2,765.90	(\$537.71)
Rock	D	8	\$ 6,619,876.00	2.10%	2487	2.59%	\$ 2,683.37	(\$620.24)
Brown	D	7	\$ 8,334,296.00	2.65%	3060	3.21%	\$ 2,723.63	(\$579.98)
Waukesha	D	6	\$ 8,453,154.00	2.68%	2590	2.72%	\$ 3,263.77	(\$39.84)
Racine	D	4	\$ 10,494,771.00	3.33%	3621	3.80%	\$ 2,898.31	(\$405.30)
Kenosha	D	3	\$ 12,061,584.00	3.83%	3679	3.86%	\$ 3,278.50	(\$25.11)
Dane	D	2	\$ 24,545,638.00	7.79%	6301	6.61%	\$ 3,895.51	\$591.91
Milwaukee	D	1	\$ 174,484,821.00	55.39%	41278	43.29%	\$ 4,227.07	\$923.46
Wisconsin			\$ 315,025,316.00	100.00%	95358	100.00%	\$ 3,303.61	

**Table 3
2006 Expenditures Rate Region**

	Rate Region	Total Receipts Rank	2006 Expenditures for Jurisdiction Residents	Percent of Statewide Total	Authorized Children In 2006	Percent of Statewide Total	Cost/child	Regional Totals
Red Cliff Tribe	A	78	\$ 22,622.00	0.01%	46	0.05%	\$ 491.78	
Sokaogon	A	77	\$ 73,467.00	0.02%	36	0.04%	\$ 2,040.75	
Pepin	A	76	\$ 97,732.00	0.03%	56	0.06%	\$ 1,745.21	
Florence	A	75	\$ 106,642.00	0.03%	56	0.06%	\$ 1,904.32	
Menominee	A	74	\$ 128,903.00	0.04%	116	0.12%	\$ 1,111.23	
Lac Du Flambeau	A	73	\$ 185,104.00	0.06%	161	0.17%	\$ 1,149.71	
Vilas	A	72	\$ 193,628.00	0.06%	134	0.14%	\$ 1,444.99	
Bayfield	A	71	\$ 202,480.00	0.06%	144	0.15%	\$ 1,406.11	
Lafayette	A	70	\$ 211,854.00	0.07%	122	0.13%	\$ 1,736.51	
Buffalo	A	69	\$ 212,914.00	0.07%	121	0.13%	\$ 1,759.62	
Adams	A	68	\$ 251,644.00	0.08%	178	0.19%	\$ 1,413.73	
Washburn	A	67	\$ 256,010.00	0.08%	179	0.19%	\$ 1,430.22	
Taylor	A	66	\$ 264,043.00	0.08%	198	0.21%	\$ 1,333.55	
Forest	A	65	\$ 264,791.00	0.08%	145	0.15%	\$ 1,826.14	
Vernon	A	64	\$ 264,835.00	0.08%	200	0.21%	\$ 1,324.18	
Clark	A	63	\$ 285,832.00	0.09%	187	0.20%	\$ 1,528.51	
Burnett	A	62	\$ 291,196.00	0.09%	177	0.19%	\$ 1,645.18	
Price	A	61	\$ 297,127.00	0.09%	174	0.18%	\$ 1,707.63	
Iowa	A	60	\$ 297,518.00	0.09%	196	0.21%	\$ 1,517.95	
Waushara	A	59	\$ 324,496.00	0.10%	229	0.24%	\$ 1,417.01	
Kewaunee	A	58	\$ 328,013.00	0.10%	174	0.18%	\$ 1,885.13	
Marquette	A	57	\$ 337,011.00	0.11%	215	0.23%	\$ 1,567.49	
Juneau	A	56	\$ 343,018.00	0.11%	228	0.24%	\$ 1,504.46	
Polk	A	55	\$ 558,377.00	0.18%	376	0.39%	\$ 1,485.05	
Trempealeau	A	54	\$ 719,014.00	0.23%	403	0.42%	\$ 1,784.15	
Shawano	A	53	\$ 764,853.00	0.24%	442	0.46%	\$ 1,730.44	
Sawyer	A	52	\$ 850,429.00	0.27%	485	0.51%	\$ 1,753.46	
Oconto	A	51	\$ 951,503.00	0.30%	455	0.48%	\$ 2,091.22	\$ 9,085,056
Iron	B	50	\$ 155,930.00	0.05%	92	0.10%	\$ 1,694.89	3%
Bad River	B	49	\$ 228,116.00	0.07%	130	0.14%	\$ 1,754.74	
Jackson	B	48	\$ 250,455.00	0.08%	150	0.16%	\$ 1,669.70	
Rusk	B	47	\$ 291,024.00	0.09%	183	0.19%	\$ 1,590.30	
Crawford	B	46	\$ 312,334.00	0.10%	205	0.21%	\$ 1,523.58	
Dunn	B	45	\$ 316,379.00	0.10%	227	0.24%	\$ 1,393.74	
Green Lake	B	44	\$ 364,306.00	0.12%	196	0.21%	\$ 1,858.70	
Richland	B	43	\$ 389,586.00	0.12%	215	0.23%	\$ 1,812.03	
Marinette	B	42	\$ 405,200.00	0.13%	340	0.36%	\$ 1,191.76	
Lincoln	B	41	\$ 584,638.00	0.19%	323	0.34%	\$ 1,810.02	
Pierce	B	40	\$ 593,807.00	0.19%	264	0.28%	\$ 2,249.27	
Langlade	B	39	\$ 601,333.00	0.19%	323	0.34%	\$ 1,861.71	
Door	B	38	\$ 630,890.00	0.20%	274	0.29%	\$ 2,302.52	
Grant	B	37	\$ 690,277.00	0.22%	460	0.48%	\$ 1,500.60	
Ashland	B	36	\$ 739,501.00	0.23%	363	0.38%	\$ 2,037.19	
Barron	B	35	\$ 762,195.00	0.24%	477	0.50%	\$ 1,597.89	
Waupaca	B	34	\$ 774,207.00	0.25%	394	0.41%	\$ 1,964.99	
Monroe	B	33	\$ 794,405.00	0.25%	436	0.46%	\$ 1,822.03	
St. Croix	B	32	\$ 855,948.00	0.27%	380	0.40%	\$ 2,252.49	
Green	B	31	\$ 915,603.00	0.29%	385	0.40%	\$ 2,378.19	

Table 3
2006 Expenditures Rate Region

	Rate Region	Total Receipts Rank	2006 Expenditures for Jurisdiction Residents	Percent of Statewide Total	Authorized Children In 2006	Percent of Statewide Total	Cost/child	Regional Totals
Columbia	B	30	\$ 982,884.00	0.31%	451	0.47%	\$ 2,179.34	
Oneida	B	29	\$ 1,044,820.00	0.33%	414	0.43%	\$ 2,523.72	
Chippewa	B	28	\$ 2,049,933.00	0.65%	874	0.92%	\$ 2,345.46	
Dodge	B	27	\$ 2,225,031.00	0.71%	1028	1.08%	\$ 2,164.43	\$ 16,958,802
Calumet	C	26	\$ 856,632.00	0.27%	339	0.36%	\$ 2,526.94	5%
Sauk	C	25	\$ 1,201,400.00	0.38%	549	0.58%	\$ 2,188.34	
Manitowoc	C	24	\$ 1,239,327.00	0.39%	577	0.61%	\$ 2,147.88	
Walworth	C	23	\$ 1,394,114.00	0.44%	698	0.73%	\$ 1,997.30	
Jefferson	C	22	\$ 1,409,186.00	0.45%	644	0.68%	\$ 2,188.18	
Douglas	C	21	\$ 1,553,275.00	0.49%	672	0.70%	\$ 2,311.42	
Ozaukee	C	20	\$ 1,828,758.00	0.58%	606	0.64%	\$ 3,017.75	
Sheboygan	C	19	\$ 1,913,954.00	0.61%	847	0.89%	\$ 2,259.69	
Portage	C	18	\$ 1,930,315.00	0.61%	808	0.85%	\$ 2,389.00	
Fond du Lac	C	17	\$ 2,105,844.00	0.67%	1115	1.17%	\$ 1,888.65	
Wood	C	16	\$ 2,390,790.00	0.76%	1219	1.28%	\$ 1,961.27	
Washington	C	15	\$ 3,023,612.00	0.96%	1142	1.20%	\$ 2,647.65	
Marathon	C	14	\$ 4,143,087.00	1.32%	1667	1.75%	\$ 2,485.36	
Outagamie	C	13	\$ 4,493,774.00	1.43%	1684	1.77%	\$ 2,668.51	\$ 29,484,068
Oneida Tribe	D	12	\$ 850,045.00	0.27%	334	0.35%	\$ 2,545.04	9%
La Crosse	D	11	\$ 3,750,165.00	1.19%	1629	1.71%	\$ 2,302.13	
Eau Claire	D	10	\$ 4,168,112.00	1.32%	1519	1.59%	\$ 2,743.98	
Winnebago	D	9	\$ 5,700,510.00	1.81%	2061	2.16%	\$ 2,765.90	
Rock	D	8	\$ 6,619,876.00	2.10%	2467	2.59%	\$ 2,683.37	
Brown	D	7	\$ 8,334,296.00	2.65%	3060	3.21%	\$ 2,723.63	
Waukesha	D	6	\$ 8,453,154.00	2.68%	2590	2.72%	\$ 3,263.77	
Racine	D	5	\$ 10,494,771.00	3.33%	3621	3.80%	\$ 2,898.31	
Kenosha	D	3	\$ 12,061,584.00	3.83%	3679	3.86%	\$ 3,278.50	
Dane	D	2	\$ 24,545,638.00	7.79%	6301	6.61%	\$ 3,895.51	
Milwaukee	D	1	\$ 174,484,821.00	55.39%	41278	43.29%	\$ 4,227.07	\$ 259,462,972
Stockbridge-Munsee		1	\$ 34,418.00	0.01%	35	0.04%	\$ 983.37	82%
Wisconsin			\$ 315,025,316.00	100.00%	95358	100.00%	\$ 3,303.61	

Table 4
2006 Authorized Children by Rate Region

	Rate Region	2006 Expenditures for Jurisdiction Residents	Percent of Statewide Total	Authorized Children in 2006	Percent of Statewide Total	Cost/chlld	Regional Totals
Sokaogon	A	\$ 73,467.00	0.02%	36	0.04%	\$ 2,040.75	
Red Cliff Tribe	A	\$ 22,622.00	0.01%	46	0.05%	\$ 491.78	
Pepin	A	\$ 97,732.00	0.03%	56	0.06%	\$ 1,745.21	
Florence	A	\$ 106,642.00	0.03%	56	0.06%	\$ 1,904.32	
Menominee	A	\$ 128,903.00	0.04%	116	0.12%	\$ 1,111.23	
Buffalo	A	\$ 212,914.00	0.07%	121	0.13%	\$ 1,759.62	
Lafayette	A	\$ 211,854.00	0.07%	122	0.13%	\$ 1,736.51	
Vilas	A	\$ 193,628.00	0.06%	134	0.14%	\$ 1,444.99	
Bayfield	A	\$ 202,480.00	0.06%	144	0.15%	\$ 1,406.11	
Forest	A	\$ 264,791.00	0.08%	145	0.15%	\$ 1,826.14	
Lac Du Flambeau	A	\$ 185,104.00	0.06%	161	0.17%	\$ 1,149.71	
Price	A	\$ 297,127.00	0.09%	174	0.18%	\$ 1,707.63	
Kewaunee	A	\$ 328,013.00	0.10%	174	0.18%	\$ 1,885.13	
Burnett	A	\$ 291,196.00	0.09%	177	0.19%	\$ 1,645.18	
Adams	A	\$ 251,644.00	0.08%	178	0.19%	\$ 1,413.73	
Washburn	A	\$ 256,010.00	0.08%	179	0.19%	\$ 1,430.22	
Clark	A	\$ 285,832.00	0.09%	187	0.20%	\$ 1,528.51	
Iowa	A	\$ 297,518.00	0.09%	196	0.21%	\$ 1,517.95	
Taylor	A	\$ 264,043.00	0.08%	198	0.21%	\$ 1,333.55	
Vernon	A	\$ 264,835.00	0.08%	200	0.21%	\$ 1,324.18	
Marquette	A	\$ 337,011.00	0.11%	215	0.23%	\$ 1,567.49	
Juneau	A	\$ 343,018.00	0.11%	228	0.24%	\$ 1,504.46	
Waushara	A	\$ 324,496.00	0.10%	229	0.24%	\$ 1,417.01	
Polk	A	\$ 558,377.00	0.18%	376	0.39%	\$ 1,485.05	
Trempealeau	A	\$ 719,014.00	0.23%	403	0.42%	\$ 1,784.15	
Shawano	A	\$ 764,853.00	0.24%	442	0.46%	\$ 1,730.44	
Oconto	A	\$ 951,503.00	0.30%	455	0.48%	\$ 2,091.22	
Sawyer	A	\$ 850,429.00	0.27%	485	0.51%	\$ 1,753.46	5,633
Iron	B	\$ 155,930.00	0.05%	92	0.10%	\$ 1,694.89	6%
Bad River	B	\$ 228,116.00	0.07%	130	0.14%	\$ 1,754.74	
Jackson	B	\$ 250,455.00	0.08%	150	0.16%	\$ 1,669.70	
Rusk	B	\$ 291,024.00	0.09%	183	0.19%	\$ 1,590.30	
Green Lake	B	\$ 364,306.00	0.12%	196	0.21%	\$ 1,858.70	
Crawford	B	\$ 312,334.00	0.10%	205	0.21%	\$ 1,523.58	
Richland	B	\$ 389,586.00	0.12%	215	0.23%	\$ 1,812.03	
Dunn	B	\$ 316,379.00	0.10%	227	0.24%	\$ 1,393.74	
Pierce	B	\$ 593,807.00	0.19%	264	0.28%	\$ 2,249.27	
Door	B	\$ 630,890.00	0.20%	274	0.29%	\$ 2,302.52	
Lincoln	B	\$ 584,638.00	0.19%	323	0.34%	\$ 1,810.02	
Langlade	B	\$ 601,333.00	0.19%	323	0.34%	\$ 1,861.71	
Marinette	B	\$ 405,200.00	0.13%	340	0.36%	\$ 1,191.76	
Ashland	B	\$ 739,501.00	0.23%	363	0.38%	\$ 2,037.19	
St. Croix	B	\$ 855,948.00	0.27%	380	0.40%	\$ 2,252.49	
Green	B	\$ 915,603.00	0.29%	385	0.40%	\$ 2,378.19	
Waupaca	B	\$ 774,207.00	0.25%	394	0.41%	\$ 1,964.99	
Oneida	B	\$ 1,044,820.00	0.33%	414	0.43%	\$ 2,523.72	
Monroe	B	\$ 794,405.00	0.25%	436	0.46%	\$ 1,822.03	

Table 4
2006 Authorized Children by Rate Region

	Rate Region	2006 Expenditures for Jurisdiction Residents	Percent of Statewide Total	Authorized Children in 2006	Percent of Statewide Total	Cost/child	Regional Totals
Columbia	B	\$ 982,884.00	0.31%	451	0.47%	\$ 2,179.34	
Grant	B	\$ 690,277.00	0.22%	460	0.48%	\$ 1,500.60	
Barron	B	\$ 762,195.00	0.24%	477	0.50%	\$ 1,597.89	
Chippewa	B	\$ 2,049,933.00	0.65%	874	0.92%	\$ 2,345.46	
Dodge	B	\$ 2,225,031.00	0.71%	1028	1.08%	\$ 2,164.43	8,584
Calumet	C	\$ 856,632.00	0.27%	339	0.36%	\$ 2,526.94	9%
Sauk	C	\$ 1,201,400.00	0.38%	549	0.58%	\$ 2,188.34	
Manitowoc	C	\$ 1,239,327.00	0.39%	577	0.61%	\$ 2,147.88	
Ozaukee	C	\$ 1,828,758.00	0.58%	606	0.64%	\$ 3,017.75	
Jefferson	C	\$ 1,409,186.00	0.45%	644	0.68%	\$ 2,188.18	
Douglas	C	\$ 1,553,275.00	0.49%	672	0.70%	\$ 2,311.42	
Walworth	C	\$ 1,394,114.00	0.44%	698	0.73%	\$ 1,997.30	
Portage	C	\$ 1,930,315.00	0.61%	808	0.85%	\$ 2,389.00	
Sheboygan	C	\$ 1,913,954.00	0.61%	847	0.89%	\$ 2,259.69	
Fond du Lac	C	\$ 2,105,844.00	0.67%	1115	1.17%	\$ 1,888.65	
Washington	C	\$ 3,023,612.00	0.96%	1142	1.20%	\$ 2,647.65	
Wood	C	\$ 2,390,790.00	0.76%	1219	1.28%	\$ 1,961.27	
Marathon	C	\$ 4,143,087.00	1.32%	1667	1.75%	\$ 2,485.36	
Outagamie	C	\$ 4,493,774.00	1.43%	1684	1.77%	\$ 2,668.51	12,567
Oneida Tribe	D	\$ 850,045.00	0.27%	334	0.35%	\$ 2,545.04	13%
Eau Claire	D	\$ 4,168,112.00	1.32%	1519	1.59%	\$ 2,743.98	
La Crosse	D	\$ 3,750,165.00	1.19%	1629	1.71%	\$ 2,302.13	
Winnebago	D	\$ 5,700,510.00	1.81%	2061	2.16%	\$ 2,765.90	
Rock	D	\$ 6,619,876.00	2.10%	2467	2.59%	\$ 2,683.37	
Waukesha	D	\$ 8,453,154.00	2.68%	2590	2.72%	\$ 3,263.77	
Brown	D	\$ 8,334,296.00	2.65%	3060	3.21%	\$ 2,723.63	
Racine	D	\$ 10,494,771.00	3.33%	3621	3.80%	\$ 2,898.31	
Kenosha	D	\$ 12,061,584.00	3.83%	3679	3.86%	\$ 3,278.50	
Dane	D	\$ 24,545,638.00	7.79%	6301	6.61%	\$ 3,895.51	
Milwaukee	D	\$ 174,484,821.00	55.39%	41278	43.29%	\$ 4,227.07	68,539
Stockbridge-Munsee		\$ 34,418.00	0.01%	35	0.04%	\$ 983.37	72%
Wisconsin		\$ 315,025,316.00	100.00%	95358	100.00%	\$ 3,303.61	

Table 5
Dollars by Provider Type for Region D and Wisconsin

	Dollars by Provider Type										Unregulat ed	Total
	Licensed Group	Public School	Cert School	Age	Licensed Family	Regular Certifield	In-Home Reg. Certifield	Provisionality Certified	In-Home Prov. Certified	Unregulat ed		
Brown	\$ 8,001,207	\$ 4,132	\$ -	\$ -	\$ 171,800	\$ 107,210	\$ 319	\$ 49,628	\$ -	\$ -	\$ -	\$ 8,334,296
Dane	\$ 18,048,219	\$ 234,424	\$ 6,073	\$ 2,517,078	\$ 3,148,418	\$ 26,411	\$ 561,654	\$ 3,361	\$ -	\$ -	\$ -	\$ 24,545,638
Eau Claire	\$ 2,798,279	\$ 193	\$ -	\$ 801,804	\$ 480,484	\$ 1,036	\$ 85,778	\$ -	\$ -	\$ 538	\$ -	\$ 4,168,112
Kenosha	\$ 8,320,700	\$ 163,289	\$ 1,625	\$ 1,136,410	\$ 2,033,946	\$ -	\$ 397,732	\$ 7,694	\$ 188	\$ -	\$ -	\$ 12,061,584
La Crosse	\$ 2,315,272	\$ 209	\$ -	\$ 675,983	\$ 563,571	\$ 101,267	\$ 70,410	\$ 23,454	\$ -	\$ -	\$ -	\$ 3,750,166
Milwaukee	\$ 109,432,270	\$ 3,529,141	\$ 505,714	\$ 49,299,383	\$ 10,993,771	\$ -	\$ 717,162	\$ 7,379	\$ -	\$ -	\$ -	\$ 174,484,820
Racine	\$ 5,872,938	\$ 462	\$ 9,511	\$ 1,045,495	\$ 3,151,201	\$ -	\$ 415,165	\$ -	\$ -	\$ -	\$ -	\$ 10,494,772
Rock	\$ 5,058,223	\$ 568	\$ -	\$ 1,160,948	\$ 363,774	\$ -	\$ 36,362	\$ -	\$ -	\$ -	\$ -	\$ 6,619,875
Waukesha	\$ 7,786,131	\$ 3,667	\$ -	\$ 427,338	\$ 225,530	\$ -	\$ 10,487	\$ -	\$ -	\$ -	\$ -	\$ 8,453,153
Winnebago	\$ 5,129,045	\$ 7,766	\$ -	\$ 334,142	\$ 137,835	\$ 26,514	\$ 53,370	\$ 11,838	\$ -	\$ -	\$ -	\$ 5,700,510
Oneida Tribe	\$ 815,080	\$ -	\$ -	\$ 3,653	\$ 10,971	\$ -	\$ 20,341	\$ -	\$ -	\$ -	\$ -	\$ 850,045
Wisconsin	\$ 210,949,702	\$ 4,313,759	\$ 556,473	\$ 67,439,534	\$ 27,502,347	\$ 236,390	\$ 3,778,649	\$ 245,765	\$ 2,700	\$ -	\$ -	\$ 315,025,319
	66.96%	1.37%	0.18%	21.41%	8.73%	0.08%	1.20%	0.08%	0.00%	0.00%	0.00%	
Region D	\$ 173,577,364	\$ 3,943,851	\$ 522,923	\$ 57,574,034	\$ 21,216,711	\$ 155,547	\$ 2,418,089	\$ 53,726	\$ 726	\$ -	\$ -	\$ 259,462,971
	66.90%	1.52%	0.20%	22.19%	8.18%	0.06%	0.93%	0.02%	0.00%	0.00%	0.00%	

Table 6

Number of Subsidized Children per Participating Provider Location

	Total
Brown	16.90
Dane	12.21
Eau Claire	10.31
Kenosha	15.33
La Crosse	8.56
Milwaukee	23.17
Racine	9.01
Rock	12.51
Waukesha	9.28
Winnebago	11.25
Oneida Tribe	7.25
Wisconsin	12.62
Region D	16.62

Table 7

Wisconsin School Free/Reduced Eligibility Data for School Fiscal Year 2006, by County								
County	Enrollment	Free-Reduced Count	Rate Region	Enrollment	Free-Reduced Count	%F/R	% of Statewide Enrollment	% of Statewide F/R
Adams	1990	1163	A					
Bayfield	1871	793	A					
Buffalo	2292	553	A					
Burnett	2190	1069	A					
Clark	5355	1972	A					
Florence	589	223	A					
Forest	1813	798	A					
Iowa	3689	690	A					
Juneau	4071	1670	A					
Kewaunee	3283	505	A					
Lafayette	3038	717	A					
Marquette	2056	766	A					
Menominee	906	737	A					
Oconto	4877	1359	A					
Pepin	1417	384	A					
Polk	8000	2227	A					
Price	2215	689	A					
Sawyer	2353	1042	A					
Shawano	6115	1953	A					
Taylor	3101	944	A					
Trempealeau	5761	1647	A					
Vernon	4337	1399	A					
Vilas	2624	1074	A					
Washburn	2699	1081	A					
Waushara	2957	1316	A	79599	26771	34%	9%	10%
Ashland	2942	1455	B					
Barron	7526	2518	B					
Chippewa	8754	2687	B					
Columbia	9033	1788	B					
Crawford	2395	908	B					
Dodge	8093	1888	B					
Door	3920	894	B					
Dunn	5754	1797	B					
Grant	7354	2299	B					
Green	5806	977	B					
Green Lake	3167	780	B					
Iron	865	380	B					
Jackson	3218	1141	B					
Langlade	3321	1441	B					
Lincoln	4724	1238	B					
Marinette	6591	2488	B					
Monroe	6834	2426	B					
Oneida	5067	1581	B					
Pierce	7181	1150	B					
Richland	1738	511	B					
Rusk	2411	1206	B					

Table 7

Wisconsin School Free/Reduced Eligibility Data for School Fiscal Year 2006, by County								
County	Enrollment	Free-Reduced Count	Rate Region	Enrollment	Free-Reduced Count	%F/R	% of Statewide Enrollment	% of Statewide F/R
Saint Croix	12449	1618	B					
Waupaca	9821	2577	B	128964	35748	28%	15%	14%
Calumet	3915	659	C					
Douglas	6517	2487	C					
Fond du lac	15281	3684	C					
Jefferson	11808	2637	C					
Manitowoc	11573	2652	C					
Marathon	18808	5136	C					
Outagamie	31508	6629	C					
Ozaukee	12265	910	C					
Portage	9246	2362	C					
Sauk	11490	2831	C					
Sheboygan	18743	4708	C					
Walworth	15605	4070	C					
Washington	18639	2416	C					
Wood	13201	3619	C	198599	44800	23%	23%	17%
Brown	40147	11514	D					
Dane	64597	14358	D					
Eau Claire	13253	3955	D					
Kenosha	29532	9450	D					
LaCrosse	15160	4367	D					
Milwaukee	141639	76369	D					
Racine	30322	9185	D					
Rock	27969	8703	D					
Waukesha	60858	5802	D					
Winnebago	23027	5817	D	446504	149520	33%	52%	58%
	853666	256839				30%		

Table 8

School Free/Reduced Eligibility Data for School Fiscal Year 2006, 1					
County	Enrollment	Free-Reduced Count	%F/R	% of Region D Enrollment	% of Region D F/R
Brown	40147	11514	29%	9%	8%
Dane	64597	14358	22%	14%	10%
Eau Claire	13253	3955	30%	3%	3%
Kenosha	29532	9450	32%	7%	6%
LaCrosse	15160	4367	29%	3%	3%
Milwaukee	141639	76369	54%	32%	51%
Racine	30322	9185	30%	7%	6%
Rock	27969	8703	31%	6%	6%
Waukesha	60858	5802	10%	14%	4%
Winnebago	23027	5817	25%	5%	4%
Statewide	853666	256839	30%		
Region D	446504	149520	33%		

Table 9
Lost Revenue Increase with
Age Group Factors
for Dane and Milwaukee Counties

Dane County Licensed Family Providers

	Age Group				
	< 2	2 - 3	4 - 5	6+	
# of Children by age in Lfam Dane	115	153	153	176	597
% split of age groups	19.26%	25.63%	25.63%	29.48%	
2006 Rate	\$190.00	\$175.50	\$165.00	\$157.50	
2007 Market Rate	\$195.00	\$180.00	\$175.00	\$165.00	
Diff in \$	\$5.00	\$4.50	\$10.00	\$7.50	
Diff in %	2.63%	2.56%	6.06%	4.76%	
2006 % split of revenue by age group	21.49%	26.41%	24.83%	27.27%	
2006 Revenue by Age group	\$540,966	\$664,794	\$625,020	\$686,297	
New Revenue based on % inc by age group	\$555,202	\$681,840	\$662,900	\$718,978	\$2,618,921
Lfam 2006 \$\$ in Dane	\$2,517,078	\$2,517,078	\$2,517,078	\$2,517,078	\$2,517,078
Potential Revenues with Increased Rates in 2007				\$101,843	
Potential % Increase in Revenue				4.05%	
	\$21,850.00	\$26,851.50	\$25,245.00	\$27,720.00	101666.5

Milwaukee County Licensed Family Providers

	Age Group				
	< 2	2 - 3	4 - 5	6+	
# of Children by age in Lfam Dane	2310	2158	2158	4746	11371
% split of age groups	20.31%	18.97%	18.97%	41.74%	
2006 Rate	\$190.00	\$175.00	\$165.00	\$155.00	
2007 Market Rate	\$195.00	\$180.00	\$175.00	\$165.00	
Diff in \$	\$5.00	\$5.00	\$10.00	\$10.00	
Diff in %	2.63%	2.86%	6.06%	6.45%	
2006 % split of revenue by age group	23.00%	19.79%	18.66%	38.55%	
2006 Revenue by Age group	\$11,339,933	\$9,755,146	\$9,197,709	\$19,006,596	
New Revenue based on % inc by age group	\$11,638,352	\$10,033,864	\$9,755,146	\$20,232,828	\$51,660,190
Lfam 2006 \$\$ in Dane	\$49,299,383	\$49,299,383	\$49,299,383	\$49,299,383	\$49,299,383
Potential Revenues with Increased Rates in 2007				\$2,360,807	
Potential % Increase in Revenue				4.79%	
	\$438,900.00	\$377,562.50	\$355,987.50	\$735,630.00	1908080