

Coordination and Delivery of Senior Services in Idaho

Follow-up Report
February 2012

Office of Performance Evaluations
Idaho Legislature



Report 12-05F

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Follow-up Report

Executive Summary

We evaluated the delivery of senior services in Idaho and released a report in 2011 with 11 recommendations. We made ten recommendations to the commission and the AAAs and one recommendation to the Legislature.

The Idaho Commission on Aging has recently experienced a significant amount of employee turnover. More than half of the full-time staff at the commission have been in their positions less than a year, including the administrator, deputy administrator, and fiscal officer. As a result, the implementation of most of our recommendations has been understandably delayed. Despite this delay, the commission concurs with most of our recommendations and has taken preliminary steps to implement many of them.

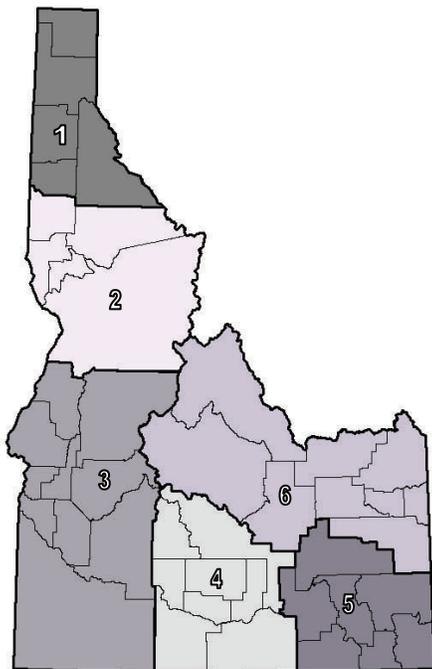
The six area agencies on aging (AAAs) have also begun to address many of our recommendations as they work with the commission and providers to deliver services to Idaho's aging population. For example, Areas I, II, III, and VI have moved closer to standardizing reimbursement rates for services like congregate and home-delivered meals, transportation, homemaker, and respite.¹

Overview of Initial Report

In February 2011, we issued a report on the coordination and delivery of senior services in Idaho. The report outlined the role of the US Administration on Aging, the Idaho Commission on Aging, the area agencies on aging (AAA), and local providers in delivering services to seniors. Idaho's six AAAs are listed in exhibit 1. We reviewed services such as congregate and home-delivered meals, transportation, homemaker, and respite.

¹ Areas IV and V had previously standardized their reimbursement rates.

EXHIBIT 1 AREA AGENCY ON AGING REGIONAL MAP



1. Area Agency on Aging of North Idaho
(North Idaho College)
2. North Central Idaho Area Agency on Aging
(Community Action Partnership)
3. Southwest Idaho Area Agency on Aging
(Sage Community Resources)
4. Office on Aging, Area IV
(College of Southern Idaho)
5. Area Agency on Aging for Southeast Idaho
(Southeast Idaho Council of Governments)
6. Area VI Agency on Aging
(Eastern Idaho Community Action Partnership)

Source: Information provided by the Idaho Commission on Aging.

Our initial evaluation had six major findings:

- Beginning in fiscal year 2011, the commission's formula has redistributed state funds among the AAAs differently than in the past
- State and federal funding for senior services only covers a portion of the total costs
- Reimbursement rates varies by service and by area
- Nutrition and transportation services have declined
- The commission's performance measures do not reflect the role of the AAAs in providing senior services
- Planning for the future requires statewide collaboration among the commission, the AAAs, and service providers

We made recommendations to improve oversight, streamline business practices, and plan for the sustainability of senior centers in the future. This follow-up review assesses the progress made by the commission and the AAAs in implementing our recommendations.

Implementation of Recommendations

The initial report had ten recommendations primarily directed toward the collaborative work between the commission and the AAAs. We also had one recommendation for the Legislature.

The status of each recommendation was determined by the following definitions:

- **Implemented:** the agency has measurably met the recommendation's intent
- **Addressed:** the agency has taken an approach that diverged from the recommendation but has still met the recommendation's intent
- **In process:** the agency has begun to measurably address the recommendation's intent
- **Not implemented:** the agency has not begun to measurably address the recommendation's intent

Our assessment of the commission's and the AAAs' efforts are as follows:

- One recommendation has been implemented
- One recommendation has been addressed
- Eight recommendations are in process
- One recommendation has not been implemented

The commission had several personnel changes in 2010 and 2011. Of the twelve full-time staff, seven individuals are new to the commission, including the administrator, deputy administrator, and the fiscal officer. These personnel changes understandably delayed the implementation of many of the recommendations.

The AAA directors told us that communication and the working relationship between the commission and the AAAs have improved significantly with the new administration and staff at the commission. One AAA director said that the commission has been more proactive in working with the AAAs and is involving the AAAs in the decision-making process when applicable.

Reviewing Funding Distribution

Recommendation 3.1: *The commission has only recently begun implementing its formula for distributing state funds. However, given the impact the state formula will have on each area, the commission should collaborate with the AAAs to analyze how shifts in funding are affecting service delivery. If necessary, we encourage the commission to subsequently seek ways to minimize potential negative impacts.*

The commission implemented a new formula in fiscal year 2011 for the distribution of state funds. Although the new formula standardized the method of allocating state funds among all six AAAs, it was a significant departure from the previous method and reduced funding levels to several AAAs. This recommendation encouraged the commission to work with those AAAs to minimize negative impacts.

The commission plans to review the funding methodology, looking specifically at aligning weighting categories with federal requirements. The formula is weighted to include factors such as senior populations living in poverty or alone, the number of senior racial minorities, and seniors living in rural communities. Commission officials have been collaborating with the AAAs to standardize the priority of services and have made changes to the program manuals. They hope to complete this process by March 2012.

According to several AAA directors, including the Area I director whose funding increased as a result of the new formula, the delivery of services continues to be a challenge. One AAA director had to eliminate three positions as a result of the shifts in funding. Another AAA director noted that the distribution of funds is secondary to the larger issue of insufficient funds. According to the AAAs directors, budget cuts in the past several years have increased the number of seniors on waiting lists—three areas have waiting lists for homemaker and respite services, and four areas have waiting lists for case management services. At the end of 2011, 888 individuals were on waiting lists throughout the state. Exhibit 2 shows that the majority of these seniors were living in areas I and III.

Status: This recommendation is **in process**.

EXHIBIT 2 NUMBER OF SENIORS ON WAITING LISTS, BY AREA

	Homemaker	Respite	Case Management
Area I	46	52	104
Area II	0	0	39
Area III	96	0	476
Area IV	0	2	0
Area V	8	5	60
Area VI	0	0	0
Total	150	59	679

Source: Analysis of data provided by the six area agencies on aging as of December 31, 2011.

Clarifying Manuals, Contracts, and Agreements

We made four recommendations to the commission and the AAAs to clarify manuals, contracts, and agreements. These clarifications will improve oversight, ensure consistency in contracting language, and correctly apply the use of state funds.

Commission Manuals

Recommendation 4.1: *To ensure all AAAs and providers spend state funds appropriately according to state law, the commission should add clarifying language to its manuals to specify how state funds can be used and for which services.*

Federal funding of senior services through the Older Americans Act allows for flexibility in supporting a wide range of services; however, Idaho Code specifies that state funds can only be used for the direct delivery of certain services and cannot be used for program administration or information and assistance. Because service providers are not required to track state and federal funds separately, the AAAs and the commission have difficulty ensuring that state funds are properly spent only on the direct delivery of services. Implementing this recommendation will give the AAAs and service providers specific language in their policy manuals and contracts to clearly outline the proper use of state funds.

By April 2012, the commission plans to incorporate specific language in the policy manuals, the AAAs agreements, and the state plan to address the authorization and funding distribution for each program. After the state plan is completed, the commission will submit it to the US Administration on Aging for approval in June 2012. The commission indicates it will continue to review accounting and reporting practices to ensure state funds are spent on allowable programs.

Status: This recommendation is **in process**.

AAA Contracts

Recommendation 4.2: *When necessary, each AAA should add clarifying contract language to ensure providers use state funds appropriately according to state law. In those instances when providers are delivering services that are not eligible for state funds, each AAA should modify its accounting practices to require providers to record state and federal expenditures separately.*

The AAAs' use of subcontractors caused difficulties in tracking federal and state funds separately—a challenge primarily in Area III. Implementing this recommendation will put clarifying language in the AAAs' contracts with

providers to ensure that providers do not unintentionally use state funds for ineligible services.

The AAAs have indicated that changes to contracting language and accounting practices are not necessary for two reasons: (1) the contracted services did not require separate reporting of state and federal funds, and (2) the AAAs have monitoring practices in place for both services and expenditures.

Status: The AAAs have reviewed their accounting and reporting practices to ensure state and federal funds are spent appropriately and have determined that changes to their contracting language or accounting practices are not necessary. As a result, this recommendation has been **addressed**.

Subcontractor Agreements

Recommendation 4.3: *Through the course of its statewide monitoring, the commission should ensure contracts have appropriate clarifying language and that state funds are only spent on allowable services, particularly when subcontractors are used.*

Implementing this recommendation will strengthen the commission's contract language, ensuring that requirements for state funding are adhered to not only by the AAAs but also by providers who subcontract for delivery of services with state funds.

The commission has agreed to review its contract language with the AAAs during its on-site reviews in spring 2012. If necessary, the commission will issue corrective action plans to bring the AAAs into compliance as required by Idaho Administrative Code, and it will strengthen the contract language for state and federal procurement practices. The commission has already clarified the Area III agreement on third party procurement and contracting practices.

The commission has also indicated that it will clarify language for subcontractors in an addendum to the AAA agreements and will require the AAAs to include the addendum language in their contracts with subcontractors. The commission will review third party contracts in spring 2012.

Status: This recommendation is **in process**.

Elderly Opportunity Agency

Recommendation 4.4: *To ensure all centers have a clear understanding of the Elderly Opportunity Agency's use of reimbursements, the AAA in Area III should require EOA to add clarifying language to its contracts with centers that explains how reimbursements are pooled among all participants.*

The Elderly Opportunity Agency (EOA) was one of the few AAA contractors that subcontracted to deliver congregate and home-delivered meals and transportation services, using a subcontracting method that was significantly different from other subcontracting models. Instead of directly reimbursing each senior center according to the number of meals or transportation trips the centers provided, EOA pooled the reimbursements and provided staffing to help administer the meal and transportation programs at all senior centers.

We were unable to determine the formula that EOA used to distribute funds to senior centers, but we found the reimbursement method affected centers unequally. Senior centers with a large number of meal participants received less value from EOA in the form of staffing and other services than they would have received if they were reimbursed for the number of meals they provided. Centers with a smaller number of meal participants received more value. In our initial review of subcontracts between EOA and its senior centers, we found the contracts did not clarify that reimbursements for meals at senior centers were pooled, and some center reimbursements were used to support other centers.

We recommended that Area III require EOA to add clarifying language to its contract with senior centers to highlight its method of pooling reimbursements. In July 2011, Area III added the following language to its current EOA contract:

1. Pursuant to recommendation 4.4 of the Office of Performance Evaluations' report *Coordination and Delivery of Senior Services in Idaho*, dated February 2011:
 - a. EOA shall add clarifying language to each Memorandum of Understanding (MOU) with providers/centers that explains how reimbursement is pooled among all of the providers.
 - b. Such language shall be provided to Area Agency for approval prior to its addition to the MOU.
 - c. Any MOU entered into with a provider/center shall not be considered valid unless it contains the clarifying language referred to in subparagraph a above.

Since entering into this new contract, Area III has requested updated subcontracts from EOA with its senior centers. EOA sent Area III revised contract language which attempts to explain to senior centers how funds are distributed. We reviewed the proposed language from EOA with Area III staff, and we do not believe that the language clearly communicates to the senior centers how funding is distributed. Area III intends to terminate its contract with EOA if the correct revisions are not incorporated into EOA's contracts with senior centers.

Status: This recommendation is **in process**.

Standardizing Reimbursement Rates

Recommendation 5.1: *We encourage the AAAs to continue their efforts to standardize reimbursement rates and identify any providers that are reimbursed at a much higher or lower rate than the area average. Once those providers are identified, each AAA should determine the factors used in setting rates within its region and consider decreasing variations in an effort to have a more uniform reimbursement process.*

In our initial evaluation, we found that the AAAs reported different reimbursement rates for similar services. The rates varied among providers in the same region and among providers in other regions. The commission does not set statewide reimbursement rates, rather each AAA sets its own.

Even before our initial evaluation, several AAAs standardized some reimbursement rates for services within their regions including congregate and home-delivered meals, transportation, homemaker, and respite. We recommended the AAAs continue to evaluate reimbursement rates within their regions and either reduce the variation in reimbursement rates or articulate the criteria used for varying rates.

All six AAAs have continued their efforts to standardize reimbursement rates. As shown in the appendix, the range of rates has generally decreased for congregate and home-delivered meals, transportation, homemaker, and respite services. In addition, all of the AAAs have made progress in decreasing the level of variation within their region, and several regions have standardized their reimbursement rates with no variation by service. Area III decreased the level of variation in all five services. Areas I, II, IV, V, and VI standardized rates for homemaker and respite services, and Areas IV and V had previously standardized rates.

We asked the AAA directors to justify why some providers of services within an region are awarded different reimbursement rates. One AAA director told us the difference in rates for homemaker services was to compensate providers who work in rural areas, which are difficult to serve. Another AAA director cited that meal reimbursement rates were affected by distance from major retail centers and by population sizes. In Area III, respite services are provided with a voucher program. Case managers work with seniors to determine the correct level of care needed, and reimbursements are standardized by the level of care provided.

Status: This recommendation is **implemented**.

Establishing More Comprehensive Financial Reviews

Recommendation 6.1: *The commission should conduct a more comprehensive financial review to allow the AAAs and the commission to improve financial practices statewide. This review could also resolve discrepancies in the data maintained by the commission, as well as the data reported to the Administration on Aging.*

In our initial evaluation, we found discrepancies between the monthly expenditure reports of the AAAs and the quarterly reports the commission gave to the US Administration on Aging. We highlighted several oversight and reporting requirements that the commission and the AAAs needed to perform to ensure data and fiscal accuracy, including fiscal reviews and on-site programmatic reviews.

We recommended that the fiscal review process be reevaluated to improve financial practices statewide. The commission concurs with this recommendation and plans to develop a review plan and begin on-site reviews in March 2012. The commission believes that some of the financial discrepancies we found were a result of different accounting methods. The commission has changed its accounting method from accrual to cash to align with the accounting method used by the US Administration on Aging.

Status: This recommendation is **in process**.

Ensuring Data Quality

Recommendation 6.2: *The commission should build on its role of ensuring data quality and consistency by consolidating data management software licenses and bringing all users to a comparable level of functionality within the current web-based system. In addition, the commission should sponsor more statewide trainings on the use of the web-based system and the importance of comprehensive data management.*

The commission and AAAs use a web-based reporting system for data management and federal reporting. At the time of our initial evaluation, the commission and each AAA had separate license agreements with the software vendor, as well as different data tracking software capabilities. We recommended consolidating the software licenses with the commission to maximize benefits and improve processes in two areas:

- Ensure that all AAAs have similar software capabilities and functionality, allowing for advanced analysis and reporting of data.
- Ensure that training for the AAAs could be coordinated statewide. We found that many users of the current system either had not received any formal training or were unaware of the total functionality of the system.

We confirmed with the software vendor that consolidating the licenses would have a minimal increase in the total licensing costs and could allow for flexibility by the AAAs that wished to add functionality above the state minimum capabilities.

In 2011, the commission consolidated software licenses but later reverted them to an agency-specific administrative and billing model. The commission cited several challenges that arose when the licenses were consolidated, including a lack of customer support, user license issues, the AAAs complaints with service, and billing and contract issues. Although the commission has not sponsored any statewide trainings, it plans to review how the AAAs' data is collected and reported during its on-site reviews in March 2012.

Status: This recommendation is **in process**.

Expanding Annual Reporting and Performance Measures

Recommendation 7.1: *To provide the Legislature with more comprehensive information on statewide senior services and to better track the use of state funds, the commission should expand its performance measures to include the total number and types of senior services that are provided each year. In addition, the commission should work with each AAA to identify area-specific performance measures and include that information in its annual report.*

In our initial report, we discussed the inconsistencies between what the commission reported to the US Administration on Aging and what it reported to the Governor in its annual report. The information in the annual report lacked crucial information about the performance of the AAAs and the services provided throughout the state to seniors in need. Likewise, the commission's performance measures to the Legislature lacked information on the services provided to seniors and did not accurately reflect the work performed throughout the state in collaboration with the AAAs. This recommendation encouraged the inclusion of the coordinated work done with the AAAs in the commission's performance measures and annual report.

In its 2011 annual report, the commission reported on the services provided by the AAAs. The report included the number of services delivered for congregate and home delivered meals, homemaker, respite, case management, information and assistance, adult protection, and ombudsman services. The commission has indicated in its performance measurement report for fiscal year 2013 that it is in the process of revising performance measures.

Status: This recommendation is **in process**.

Assisting Senior Centers

Recommendation 7.2: *The commission and the AAAs should partner to assist senior centers in meeting the needs of seniors in local communities, including understanding reasons for decline in center participation. This assistance could come in the form of a statewide conference, additional training manuals, or guidance throughout the accreditation process.*

In our initial evaluation, we found that although center participation was declining, centers continued to be the primary source for meals served to seniors in need. Many seniors do not access centers in a way that aligned with previous generations, which creates challenges for the centers in attracting new members. Because of the important role senior centers play in providing meals in both congregate and home-delivered settings, this recommendation was designed to create statewide collaboration to maintain the relevancy of senior centers.

The AAAs continue to help senior centers understand the reasons for decline in participation and advise them about best practices and strategies for revitalization. For example, Area V is reviewing the business plans of its centers, and Area I and Area III held workshops in 2011 with local centers. Areas V and VI also reported holding quarterly meetings with center managers. Area IV has distributed information on national best practices to its centers and has provided training opportunities to senior center board members. Unfortunately, the AAA director in Area VI noted that two centers terminated their nutrition programs during the past year because of low program participation.

In addition to the work being done by the AAAs, the commission has enhanced some of the tools on its website to provide seniors with more information about center locations and available services. The commission plans to partner with the AAAs to collect and analyze data to better understand the reasons for declines in center participation.

The commission has recently worked with the US Administration on Aging, Feeding America, and the Idaho Food Bank to provide senior centers in Idaho with more than 500,000 pounds of food.² The commission is also collaborating with these organizations to revise nutrition manuals used by the commission and the AAAs.

Status: Because the AAAs and commission have not yet created a statewide partnership to provide training and other types of guidance, this recommendation is **in process**.

² Feeding America is a national charity that works to reduce hunger.

Amending Statute to Provide More Flexibility

Recommendation 7.3: *As the state continues its implementation of the Aging and Disability Resource Connections (ADRC), the Legislature should consider modifying statute to allow the AAAs to use state funds for additional senior services, such as the information and assistance program.*

The commission has developed a web-based information and assistance initiative called the Aging and Disability Resource Connections (ADRC), designed to streamline long-term services and support across several agencies for older adults and adults with disabilities. The ADRC is a federally funded initiative but grants are gradually being phased out. In the commission's fiscal year 2013 budget, it requested \$3,700 in one-time general fund money and \$55,000 in one-time federal funds. The commission plans to pass \$44,900 of the one-time funds to the AAAs for the implementation of the ADRC.

We recommended that the commission work with the Legislature to determine whether services such as the ADRC, information and assistance, and other services not listed in the Idaho Senior Service Act should be included to give AAAs more flexibility in funding programs and services, particularly information and assistance. Including this service would more closely align the state with the federal funding framework for allowable senior services. The commission, however, disagrees with this recommendation and believes that the AAAs have enough flexibility within the federal funding they receive to provide information and assistance.

Status: This recommendation is **not implemented**.

Appendix

Change in the Range of Reimbursement Rates by Area

Area I

	Contract Year	Reimbursement Range (\$)	Variation (\$)
Congregate meals	2009	2.80–4.16	1.36
	2012	3.25–3.80	0.55
Home-delivered meals	2009	3.00–6.00	3.00
	2012	3.50–5.00	1.50
Transportation	2009	5.35–6.00	0.65
	2012	4.00–5.00	1.00
Homemaker	2009	15.00	0.00
	2012	15.00	0.00
Respite	2009	7.00–15.50	8.50
	2012	7.00–15.50	8.50

Area II

	Contract Year	Reimbursement Range (\$)	Variation (\$)
Congregate meals	2009	1.28–2.18	0.90
	2012	1.81–2.38	0.57
Home-delivered meals	2009	2.63–2.78	0.15
	2012	3.32–3.56	0.24
Transportation ^a	2009	12.80	0.00
	2012		
Homemaker	2009	14.00	0.00
	2012	14.00	0.00
Respite	2009	14.00	0.00
	2012	14.00 ^b	0.00

^a Transportation services are not currently provided.

^b One provider was excluded from the analysis because its reimbursement rate is calculated per day rather than per hour.

*Appendix—cont'd***Area III**

	Contract Year	Reimbursement Range (\$)	Variation (\$)
Congregate meals	2009	2.08–2.90	0.82
	2012	2.90	0.00
Home-delivered meals	2009	2.40–3.95	1.55
	2012	3.95	0.00
Transportation	2009	2.50–5.86	3.36
	2012	3.00	0.00
Homemaker	2009	13.75–20.00	6.25
	2012	14.35 ^a	0.00
Respite	2009	9.17–25.00 ^b	15.83
	2012	10.00–25.00 ^b	15.00

^a Two providers were excluded from the analysis because they are reimbursed at a different rate for serving a rural, hard-to-serve location.

^b Area III uses a tiered voucher system for respite services. Rates are standardized within each tier.

Area IV

	Contract Year	Reimbursement Range (\$)	Variation (\$)
Congregate meals	2009	1.60–4.80	3.20
	2012	1.50–4.70	3.20
Home-delivered meals	2009	1.60–4.75	3.15
	2012	1.50–4.65	3.15
Transportation	2009	4.00 ^a	0.00
	2012	4.00 ^a	0.00
Homemaker	2009	14.50	0.00
	2012	14.50	0.00
Respite	2009	12.00	0.00
	2012	12.00	0.00

^a Transportation providers were excluded from the analysis because they are reimbursed per mile instead of per one-way trip. The per mile reimbursement rate is standardized within the area.

Appendix—cont'd

Area V

	Contract Year	Reimbursement Range (\$)	Variation (\$)
Congregate meals	2009	1.75	0.00
	2012	2.00	0.00
Home-delivered meals	2009	2.00	0.00
	2012	2.25	0.00
Transportation	2009	1.80–3.65	1.85
	2012	3.45–3.57	0.12
Homemaker	2009	15.00	0.00
	2012	15.00	0.00
Respite	2009	15.00	0.00
	2012	15.00	0.00

Area VI

	Contract Year	Reimbursement Range (\$)	Variation (\$)
Congregate meals	2009	1.10–1.90	0.80
	2012	1.10–1.90	0.80
Home-delivered meals	2009	2.00–2.70	0.70
	2012	2.00–2.50	0.50
Transportation ^a	2009		
	2012		
Homemaker	2009	13.00–14.00	1.00
	2012	13.00	0.00
Respite	2009	10.00	0.00
	2012	10.00	0.00

^a Transportation services are not provided.

Source: Analysis of data provided by the six area agencies on aging.

Office of Performance Evaluations Reports, 2009–Present

Publication numbers ending with “F” are follow-up reports of previous evaluations. Publication numbers ending with three letters are federal mandate reviews—the letters indicate the legislative committee that requested the report.

Pub. #	Report Title	Date Released
09-01	Public Education Funding in Idaho	January 2009
09-02F	Higher Education Residency Requirements	January 2009
09-03	Idaho Transportation Department Performance Audit	January 2009
09-04	Feasibility of School District Services Consolidation	February 2009
09-05F	School District Administration and Oversight	February 2009
09-06F	Use of Average Daily Attendance in Public Education Funding	February 2009
09-07F	Child Welfare Caseload Management	February 2009
09-08F	Public Education Technology Initiatives	February 2009
09-09F	Management in the Department of Health and Welfare	March 2009
09-10F	Governance of Information Technology and Public Safety Communications	April 2009
10-01	Operational Efficiencies in Idaho’s Prison System	January 2010
10-02	Increasing Efficiencies in Idaho's Parole Process	February 2010
10-03F	Use of Average Daily Attendance in Public Education	March 2010
10-04	Governance of EMS Agencies in Idaho	November 2010
10-05F	Governance of Information Technology and Public Safety Communications	November 2010
11-01	Distribution and Sale of Liquor in Idaho	January 2011
11-02	Coordination and Delivery of Senior Services in Idaho	February 2011
11-03F	Increasing Efficiencies in Idaho’s Parole Process	February 2011
11-04F	Idaho Transportation Department Performance Audit	March 2011
11-05	Delays in Medicaid Claims Processing	March 2011
11-06	Higher Education Funding Equity	November 2011
11-07	End-Stage Renal Disease Program	November 2011
11-08F	Distribution and Sale of Liquor in Idaho	November 2011
12-01	Reducing Barriers to Postsecondary Education	January 2012
12-02F	Delays in Medicaid Claims Processing	January 2012
12-03	Lottery Operations and Charitable Gaming	February 2012
12-04	Establishing an Efficiency Commission	February 2012
12-05F	Coordination and Delivery of Senior Services in Idaho	February 2012
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