SOUTH CAROLINA COMMISSION ON DISABILITIES AND SPECIAL NEEDS

MINUTES

February 19, 2015

The South Carolina Commission on Disabilities and Special Needs met on Thursday, February 19, 2015, at 10:00 A.M. at the Department of Disabilities and Special Needs Central Office, 3440 Harden Street Extension, Columbia, South Carolina.

The following were in attendance:

COMMISSION

<u>Present</u>: Christine Sharp, Chairperson Fred Lynn, Vice Chairman Eva Ravenel, Secretary Bill Danielson Katherine Davis Katherine Finley (Via Teleconference) Harvey Shiver

DDSN Administrative Staff

Dr. Buscemi, State Director; Mrs. Susan Beck, Associate State Director, Policy; Mr. David Goodell, Associate State Director, Operations; Mr. Tom Waring, Associate State Director, Administration; Mrs. Tana Vanderbilt, General Counsel (For other Administrative Staff see Attachment 1 – Sign In Sheet).

<u>Guests</u>

(See Attachment 1 Sign-In Sheet)

Coastal Regional Center (via videoconference)

(See Attachment 2 Sign-In Sheet)

Pee Dee Regional Center (via videoconference)

(No one in attendance)

Whitten Regional Center (via videoconference)

(See Attachment 4 Sign-In Sheet)

York County DSN Board (via videoconference)

(See Attachment 5 York County Sign-In Sheet

February 19, 2015 DDSN Commission Meeting Minutes Page 2 of 5

News Release of Meeting

Chairperson Christine Sharp called the meeting to order and Commissioner Eva Ravenel read a statement of announcement about the meeting that was mailed to the appropriate media, interested persons, and posted at the Central Office and on the website in accordance with the Freedom of Information Act.

Invocation

Chairperson Christine Sharp gave the invocation.

Adoption of the Agenda

The Commission adopted the February 19, 2015 Meeting Agenda by unanimous consent. (Attachment A)

Approval of the Minutes of the January 15, 2015 Commission Meetings

The Commission approved the January 15, 2015 Commission Meeting minutes by unanimous consent.

Public Input

Ms. Kathleen Roberts of Newberry, SC spoke on behalf of the Whitten Center Parents' Club.

Commissioners' Update

Commissioner Katherine Davis spoke of an event in her district.

ABLE Legislation

Dr. Buscemi spoke of the federal ABLE Act that will allow people with disabilities to establish special accounts where they could save money to pay for education, health care, transportation, housing and other expenses without jeopardizing their Medicaid eligibility. She shared a summary of the ABLE Act that was provided by the NASDDDS organization and included in DDSN's presentation to the House Ways and Means Healthcare Subcommittee. Each state has to pass this act for it to go into effect. Representative Murrell Smith, Chairman of the House Ways and Means Healthcare Subcommittee, will be introducing the state legislation necessary to implement in South Carolina. We hope to get the South Carolina version adopted in the current legislative session. We will share when it does officially pass. (Attachment B) February 19, 2015 DDSN Commission Meeting Minutes Page 3 of 5

Waiting List Progress Report

Mrs. Susan Beck stated the report was revised to provide a better description of information. She gave a detailed update on the Intellectual Disability/Related Disabilities, Community Supports, the Head and Spinal Cord Waiting List, and the Critical Needs List. She stated that we are making a lot of progress with enrollments. (Attachment C)

Dr. Buscemi spoke of the steps between the milestones and staff are looking at potential bottlenecks. Individuals on the waiting list will be contacted by DDSN in an attempt to better understand the status of people waiting for services. The percentage of duplicated names has increased since last year which is positive from a family perspective. Case Managers and Care Coordinators are placing individuals on the list which means we are reaching more people.

Budget Update

Mr. Tom Waring gave an update on the budget priorities for 2016 that came out of the House Ways & Means Healthcare Subcommittee this morning. DDSN was appropriated six of the nine priorities with the following funding:

Waiting List Reduction - \$6,400,000 Transition to Less Restrictive Residential Settings - \$850,000 Post-acute Rehabilitation- \$500,000 Provider MDE - \$2,000,000 Respite Services - \$1,000,000 Nursing Care Quality - \$500,000

Autism Services - \$1,500,000 (nonrecurring) Special Family Resource - \$15,000 (nonrecurring)

Mr. Waring stated this funding of \$12,785,000 is very positive. The funding recommendations of the House Healthcare Subcommittee will next go to the full House. DDSN is scheduled to present to the Senate Finance Health and Human Services Subcommittee on March 11, 2015.

Midyear Financial Update

Mr. Tom Waring gave a detailed update of DDSN's financial position. As of December 31, 2014, the cash balance is \$130,536,037 and the agency's estimated position for June 30, 2015 is \$6,646,994.

Mr. Waring gave a detailed update of the FY 2014-2015 Spending Plan that was approved by the Commission September 25, 2014. Mr. Waring stated that DDSN is on target to meet its financial obligations and is staying in line with the spending plan the Commission previously approved. He noted that the agency is in a solid financial position. (Attachment C)

February 19, 2015 DDSN Commission Meeting Minutes Page 4 of 5

Dr. Buscemi spoke of the CLOUD project. DDSN will continue to use the present consultant but wanted others to be able to provide this service which requires a Request for Proposal. DDSN wants to keep the process open and inclusive so other providers can participate in providing the service as per the model or submit their own version of a model for DDSN's approval.

Dr. Buscemi spoke of the sprinkler system issue for residential development. She stated that existing homes do not have to have a sprinkler system but for new development residential sprinklers are required. She is reaching out to her counterparts in other states to find out how they handle the issue. The CLOUD homes do not have to have a sprinkler system, as the state fire marshal is not involved in the inspection of CLOUD facilities. DDSN is looking at what this means for other homes. We want to be sensitive to community inclusion and safety for the consumers.

NASDDDS Update

Dr. Buscemi spoke of the meeting in Baltimore, Maryland she and other NASDDDS Board Members had with top CMS leadership to discuss issues with the HCBS Final Rule being the main topic. It was very clear that CMS was unaware of different levels of communication. CMS acknowledged they were sending different messages and will work on improving the communication. Some states were told they could not use residential size as criteria to determine compliance with the HCBS Final Rule. States were worried about this allowing systems to go backwards to the time when large numbers of individuals were served in each residential program. Dr. Buscemi stated that NASDDDS and several other national organizations are in the process of writing a joint statement regarding this subject.

Recognition of Commissioner Harvey Shiver

Chairperson Christine Sharp presented Commissioner Harvey Shiver with a plaque recognizing him for his exemplary commitment, leadership, dedication, and advocacy as commissioner representing the sixth congressional district of the South Carolina Commission on Disabilities and Special Needs. Mr. Shiver stated he will remain a big supporter for the most vulnerable individuals of the state even though he will no longer be on the Commission.

State Director's Report

Dr. Buscemi reported that staff that moved downstairs during the renovation of the top floor have moved back upstairs. The renovation of the first floor should be complete by late April or early May.

Dr. Buscemi spoke of the memo she sent to the provider network calling for artwork from the consumers to display in the common areas of the building. A committee will be assigned to select the art that will be displayed. She also reached out to Special Arts asking providers to conduct an art project in addition to the call for art initiative. Dr. Buscemi stated that the training for providers and staff at the recently held Therap Conference was very well received. She received very positive feedback. Additional training for the providers will be provided.

The statewide appointment of Gary Lemel to replace Commissioner Katherine Finley was read across the Senate desk on February 3, 2015. Commissioner Finley will continue to represent the fifth Congressional District until Mr. Lemel is confirmed by the Senate.

Executive Session

On motion of Commissioner Fred Lynn, seconded and passed, the Commission entered into Executive Session to discuss contractual matters.

Enter into Public Session

The Commission entered into Public Session. It was noted that no action was taken in the Executive Session.

Next Regular Meeting Date

Chairperson Christine Sharp announced the next regular Commission Meeting is scheduled for Thursday, March 19, 2015 with the starting time to be determined. The meeting will be held at the DDSN Central Office.

Adjournment

With no further business, Chairperson Christine Sharp adjourned the meeting.

Submitted by,

Sandra J. Delaney

Approved:

Commissioner Eva Ravenel Secretary

SC COMMISSION ON DISABILITIES ANI Commission Meetin

Attachment 1

February 19, 2015

Guest Registration Sheet

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Attachment 4

SC COMMISSION ON DISABILITIES AND Commission Meeting February 19, 2015

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Attachment A

SOUTH CAROLINA COMMISSION ON DISABILITIES AI

AGENDA

South Carolina Department of Disabilities and Special Needs 3440 Harden Street Extension Conference Room 251 Columbia, South Carolina

February 19, 2015

10:00 A.M.

Chairperson Christine Sharp

Commissioner Eva Ravenel

Commissioner Harvey Shiver

- 1. Call to Order
- 2. Welcome Notice of Meeting Statement
- 3. Invocation
- 4. Introduction of Guests
- 5. Adoption of Agenda
- 6. Approval of the Minutes of the January 15, 2015 Commission Meeting
- 7. Public Input
- 8. Commissioners' Update
- 9. Business:
 - A. ABLE LegislationDr. Beverly BuscemiB. Waiting List Progress ReportMrs. Susan BeckC. Budget UpdateMr. Tom WaringD. Midyear Financial UpdateMr. Tom WaringE. NASDDDS UpdateDr. Beverly BuscemiF. Recognition of Commissioner Harvey ShiverChairperson Christine Sharp
- 10. State Director's Report
- 11. Executive Session
- 12. Next Meeting Date (March 19, 2015 at DDSN Central Office)
- 13. Adjournment

PLEASE SILENCE CELL PHONES DURING THE MEETING. THANK YOU.

Commissioners

Dr. Beverly Buscemi

Achieving a Better Life Experience (ABLE) Act Division B of Public Law 113-295, December 19, 2014



OVERVIEW

The Stephen Beck, Jr., Achieving a Better Life Experience Act¹ (ABLE) Act was signed into law on December 19, 2014 after many years of advocacy and bipartisan work in both the House and Senate. The law allows eligible individuals with disabilities the ability to establish "ABLE accounts" for qualified beneficiaries that resemble the qualified tuition programs, often called "529 accounts", that have been established under that section of the tax code since 1996. The new ABLE accounts will allow more individual choice and control over spending on qualified disability expenses and limited investment decisions, while protecting eligibility for Medicaid, Supplemental Security Income, and other important federal benefits for people with disabilities. Without these accounts, many people with disabilities have very limited avenues to save and allow for further independence.

A Form of 529 Account: The ABLE Act creates a new Section 529A establishing new taxfavored Qualified ABLE Programs in the Internal Revenue Code. The ABLE Program accounts are intended to be easy to open and available in any state, although each state will need to take action to make the accounts available to its residents. Assets in an ABLE account and distributions from the account for qualifying expenses would be disregarded or receive special treatment when determining the beneficiary's eligibility for most federal means-tested benefits.

Key Characteristics of ABLE Accounts:

- An eligible individual may have **one ABLE account**, which must be established in the state in which he resides (or in a state that provides ABLE account services for his home state).
- Any person, such as a family member, friend, or the person with a disability, may contribute to an ABLE account for an eligible beneficiary.
- An ABLE account may not receive **annual contributions** exceeding the annual gift-tax exemption (\$14,000 in 2015). A state must also ensure that aggregate contributions to an ABLE account do not exceed the state-based limits for 529 accounts.
- Eligibility An eligible individual is a person (1) who is entitled to benefits on the basis of disability or blindness under the Supplemental Security Income (SSI) program or under the Social Security disability, retirement, and survivors program OR (2) who submits certification that meets the criteria for a disability certification (to be further defined in regulations). An eligible individual's disability must have occurred before the age 26.
- **Designated Beneficiary** The eligible individual who established the ABLE account and who is the owner of the account is the "designated beneficiary".
- **Qualified disability expenses** are any expenses made for the benefit of the designated beneficiary and related to his/her disability, including: education, housing,

¹ After Stephen Beck's death in December 2014, the law was named to honor him, a parent from northern Virginia who helped conceive and develop the ABLE Act and who worked tirelessly for its passage.

transportation, employment training and support, assistive technology and personal support services, health, prevention and wellness, financial management and administrative services, legal fees, expenses for oversight and monitoring, funeral and burial expenses, and other expenses, which are approved by the Secretary of the Treasury under regulations.

- **Tax treatment** Earnings on an ABLE account and distributions from the account for qualified disability expenses do not count as taxable income of the contributor or the eligible beneficiary. Contributions to an ABLE account must be made in cash from the contributor's after-tax income.
- **Roll-Overs** Assets in an ABLE account may be rolled over without penalty into another ABLE account for either the designated beneficiary (for instance, when moving to another state) or any of the beneficiary's qualifying family members.

Federal Treatment of ABLE Account Under Means-Tested Programs, Including Supplemental Security Income & Medicaid:

- Means-Tested Programs generally Assets in an ABLE account and distributions from the account for qualified disability expenses would be disregarded when determining the designated beneficiary's eligibility for most federal means-tested benefits.
- Supplemental Security Income (SSI): For SSI, only the first \$100,000 in an ABLE account will be disregarded. Assets above \$100,000 will count as resources under SSI. In addition, if the designated beneficiary's ABLE account balance exceeds \$100,000, the individual's SSI benefits will not be terminated, but instead will be suspended until such time as the individual's resources fall below \$100,000. Further, it is intended that distributions expended for housing purposes will receive the same treatment which all housing costs paid by outside sources receive.
- Medicaid Eligibility: A beneficiary will not lose eligibility for Medicaid based on the assets held in their ABLE account, even during the time that SSI benefits are suspended (as described above for an account with over \$100,000).
- Medicaid Payback Provision: Subject to certain limits and upon the state's filing of a claim for payment, any assets remaining in an ABLE account upon the death of the qualified beneficiary must be used to reimburse the state for Medicaid payments it made on behalf of the beneficiary. The amount of any Medicaid payback is calculated based on amounts paid by Medicaid after the creation of the ABLE Account and shall exclude amounts paid by the beneficiary as premiums to a Medicaid buy-in program.

How Soon Will ABLE Accounts Be Available?

- Federal Regulations: The Secretary of the Treasury is required to issue regulations or other necessary guidance within six months of enactment of the law, which would require such regulations and/or guidance to be available by mid-June 2015.
- State Decisions: Each state will need to decide whether to offer a qualified ABLE program to its residents, and, if so, the state will need to decide whether the program will be state-run; whether to select another entity, such as a financial services firm, to run the program; or whether to contract with another state to allow its own residents to use the qualified ABLE program of another state.

ABLE Act Becomes Law

The US Senate voted 76 to 16 to approve the Stephen Beck, Jr. Achieving a Better Life Experience (ABLE) Act as part of a package of tax measures on December 16, 2014. The legislation, first introduced in 2006, passed the House the week before and has been signed by President Obama. Stephen Beck, Jr. was a longtime proponent of the legislation who died on the eve of its passage; Congress added his name to the bill to recognize his dedicated advocacy.

The ABLE Act would allow people with disabilities to establish special accounts where they could save money to pay for education, health care, transportation, housing and other expenses. Individuals could deposit up to \$14,000 annually under current gift-tax limitations and accrue as much as \$100,000 without risking eligibility for Social Security, Medicaid, and other government programs. Each person may only have one ABLE account and to qualify a person must have a condition that occurred before the age of 26.

ABLE accounts follow all the requirements and regulations of a traditional 529 qualified tuition program. ABLE account funds can be spent on "Qualified Disability Expenses," which include:

- Education including tuition for preschool thru post-secondary education, books, supplies, and educational materials related to such education, tutors, and special education services.
- Housing Expenses for a primary residence, including rent, purchase of a primary residence or an interest in a primary residence, mortgage payments, home improvements and modifications, maintenance and repairs, real property taxes, and utility charges.
- Transportation Expenses for transportation, including the use of mass transit, the purchase or modification of vehicles, and moving expenses.
- Employment Support Expenses related to obtaining and maintaining employment, including job related training, assistive technology, and personal assistance supports.
- Health Prevention and Wellness: Expenses for health and wellness, including premiums for health insurance, mental health, medical, vision, and dental expenses, habilitation and rehabilitation services, durable medical equipment, therapy, respite care, long term services and supports, nutritional management, communication services and devices, adaptive equipment, assistive technology, and personal assistance.
- Other Approved Expenses Any other expenses which are approved by the Secretary under regulations and consistent with the purposes of this section.
- Assistive Technology and Personal Support Expenses for assistive technology and personal support.
- Miscellaneous Expenses Financial management and administrative services, legal fees, expenses for oversight, monitoring, or funeral and burial

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SC Department of Disabilities and Special Ne

Waiting List	Number of Individuals	Consumer/Fam	ily Determination	Number of Individuals
	Removed from Waiting Lists	Number of individuals Enrolled in a Waiver	Number of Individuals Opted for Other Services/ Determined Ineligible	Services are Pending
Intellectual Disability/Related Disabilities	1,076	372	249	455
Community Supports	1,705	376	647	682
Head and Spinal Cord Injury	431	192	52	187
		940	948	
Total	3,212	1.	888	1,324

Waiting List Reduction Efforts As of January 31, 2015

Waiting List *	Number of Individuals Added Between July 1, 2014 and January 31, 2015	Number of Individuals Waiting as of January 31, 2015
Intellectual Disability/Related Disabilities	1,018	5,328
Community Supports	1,016	3,501
Total	2,034	8,829

* There is no longer a Head and Spinal Cord Injury (HASCI) Waiver waiting list.

** Approximately 30 percent of 8,829 are duplicated names.

South Carolina Department Of Disabilities & Special Needs As Of January 31, 2015

Service List	12/31/14	Added	Removed	01/31/15
Critical Needs	68	56	47	77
Pervasive Developmental Disorder Program	1428	94	71	1451
Intellectual Disability and Related Disabilities Waiver	5238	151	61	5328
Community Supports Waiver	3503	147	149	3501
Head and Spinal Cord Injury Waiver	0	15	15	0

Report Date: 2/10/14

FINANCIAL POSITION ANALYSIS - OPERATING FUNDS FYE 2015 AS OF 12/31/2014

	State Fund Revenue (Appropriations)	Earned Medicald Revenue	Other Revenue & One-Time Carryforward	Federal and Restricted Funds	Total
Activity through 12/31/2014					
Revenue	\$208,636,869,00	\$191,008,768.00	\$2,357,241.00	(\$39,467.00)	5401,973,411.00
Carryforward	\$822,002.00	\$5,048,773.00	\$332,978.00	\$355,110.00	\$7,558,863.00
Personal Services Expense	(\$22,987,707.00)	(\$3,166,365.00)		(\$130,004.00)	(\$26,284,076.00)
Fringe & Benefit Expense	(\$9,313,837.00)	(\$7,295,200.00)		(\$50,271.00)	(\$16,659,308.00)
Other Operating Expense	(\$50,918,152.00)	(\$185,008,078.00)	(\$119,067.00)	(\$7,556.00)	(\$236,052,853.00)
Balance as of 12/31/2014 per Financial System	\$126,239,175.00	\$1,587,898.00	\$2,581,152.00	\$127,812.00	\$130,536,037.00
Projected activity 01/01/2015 through 05/30/2015					
Revenue		\$159,173,973.33	\$2,300,000.00	\$306,826.00	\$151,780,799.33
Personal Sarvices Expense	(\$22,987,707.00)	(\$3,166,365.00)		(\$130,004.00)	(\$26,284,076.00)
Fringe & Benefit Expense	(\$9,313,837.00)	(\$7,295,200.00)		(\$50,271.00)	(\$16,659,308.00)
Other Operating Expense	(\$93,918,152.00)	(\$144,600,306.33)	(\$4,000,000.00)	(\$8,000.00)	(\$242,726,458.33)
Estimated Position as of 06/30/2015	\$19,479.00	\$5,500,000.00	\$\$81,152.00	\$246,363.00	\$6,646,994.00

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FY 2014-2015 Spending Plan - Approved by DDSN Commission 9-25-14					na se versión a record and a series a second a s
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		\$7,589,267		\$3,934,484	\$3,654,783
Residential Services		\$215,920,625		\$215,920,625	0S
		\$57,087,742		\$\$7,087,742	\$
		\$41,977,718		\$41.977,778	
Service Coordination	• • • • • • • • • • • • • • • • • • •	\$16,386,646		\$16,386,646	
		\$19,314,656		\$19,314,656	
		\$9,461,376		\$9,461,376	
		\$1,326,814	ni Ale and a second sec	\$1,326,814	
Special Service Contracts (RFP)		\$235,000		\$235,000	
Regional Centers/Community Program Services		\$95,176,986		\$46,525,338	548.651.648
		\$464,476,830		\$412,170,399	\$52,306,431
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Residential Services:					
1. Movement of individuals from Regional Centers	vouvoiver point and and and a second a se		\$5,000,000	\$1,213,648	\$3,786,352
2. Critical / Crisis Response					
3. Autism. Beds Vacated	25 Placements Due to Turnover - from base	\$1,685,500		\$676,460	\$809,040
b. 101: Beds Vacated	255 Placements Due to Turnover - from base	\$17,192,100	kadar i	\$9,034,280	\$8,157,820
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3. Alternative Residential Placements					
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Head & Spinal Cord Injury					
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2. HASCI Waiver - Expansion	300 Waiver Stots Expansion from DHHS Commitment		\$8,998,200	\$4,229,154	\$4,769,046
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1. NA ROBIE DA VANNE AUGUSTER 1. NA ROBIE DA VANNE MARKAMANANANANANANANANANANANANANANANANANANA		\$688,480		\$264,800	\$423,680
a version for the second s 3. PDS Properties	11.1.2. Waiwei Siois Expansion from FJ IS New Funding		\$1,324,000	S1.324,000	95
of the second secon	400 Stots through Attrition - from base	\$13.159.600		\$2,764,164	45 205 22
			n de companya de la c		
1. Family Support At Home Services					אני אנאני איזיינייזיייזיייזיייזייייזיייי
a. D/RD Walver - Attriction	64 Waiver Stots through Attrition - from base	\$677,888		\$529,600	\$148.288
b. D/RD Walver - Expansion	660 Waiver Slots Expansion from FY 15 New Funding		\$6.990.720	S6.990.720	os
c. CS Walver - Attrition	S92 Waiver Slots through Attrition - from base	\$6,221,920		\$2,144,040	\$4,077,880
d. CS Waiver - Expansion	615 Walver Slots Expansion from FY 15 New Funding		\$6,463,650	\$6,463,650	os
2. Consolidated State Service Package	Expansion and Conversion to New State Service Model - from FY 15 New Funding		\$3,454,500	\$2,365,356	\$1,089,144

FY 2014-2015 Spending Plan - Approved by DDSN Commission 9-25-14			~	•	
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Financiai Proisections for Fiscal Yaav 2015.		Base Expenditures as of July 1, 2014	Commitments after buy 1, 2014	Committed or Expended as of	Balance to be Completed by
Statewide Initiatives:		from round	fspuna lessel	14/11/14	a/su/15
Perronal Services and Employer Fringe Benefit Increase	non min - rips / in a province in the second state and the second s	opone in antiparticular and the second second second second provide a second second second second second second	Section and contract and contract is a section of the section of t		ologilis oslada parma do bossila
in and a second second second second and a second second second second second second second second second secon	2% Pay increase for Employees and Employer Health insurance increase		\$11,445,981	\$11,445,981	\$
Administrative Initiatives					
ertal Disabilities Software	Cletchonic Documentation. Reporting and Communication Software		MM X65	COAR TKN	VIC DCL7
	Employment Screening - Whitten Regional Center		\$12,500	South Commonwear	8
generation of the fraction of the second	Required Maintenance, Health/Safety Upgrades, Technology Needs	\$2,800,000		52 282 632	CCU (223)
2. Regional Centers	Capital Projects Debt Service Funding - Approved by Commission April 2014	\$2,997,000		\$	\$2,997,000
Other Oas-Time Funds Utilization					
o or other states of the state	version of the second se		ASM MM	UN ESCS	CAN LECS
2. Lander University - Proviso 118.16 (and	Lander University Therapeutic Equestrian Center - Burton Center		COLORY SECOND	Manahadagara	000010000
			\$1.150.000	\$	8 9
4. Special Needs Park - Savannah's Playground - Myrtte Beach - Proviso 118.16 Sava	rationamente construction and constructi		SPINICE	\$200,000	Ş
	and and Day Program.		\$100.000	\$100,000	\$
6. Community Providers Funding	intrastructure Needs - Approved by Commission July 2014		\$750.000	\$750,000	
		\$518.096.310	\$63.435.151	\$480.121.479	\$101,409,982
			CERE PARA		
			1001000		145-156-1865
2,475,000 -	Expended through 12/31/14: 5772,550				anados sedanan ina ana sa sa sa sa sa
Greenwood Genetic Center Autism Research: In accordance with the Proviso, funds must be un	funds must be unencumbered from the PDD program. If has been determined that only 5253 AVI can be made available for this aurone a	S263 OVI cao ha made	availahla foc this o		