

APPLICATION FOR FEDERAL ASSISTANCE

Applicant: Nebraska Department of Health and Human Services
Division of Children and Family Services
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Employer ID # 47-0491233
DUNS # 808819957

Title of Project: Children's Justice Act CFDA 93.643

Area Affected: Statewide

Dates: Start-October 1, 2013
End-September 30, 2014

Estimated Funding: \$136,695

To the best of my knowledge and belief, all data in this application is true and correct. The governing body of the applicant has duly authorized the document and the applicant will comply with the attached assurances if the assistance is awarded.

Authorized Representative: Thomas D. Pristow, Director
Division of Children and Family Services
Nebraska Department of Health and Human Services
(402)471-1878

Thomas D. Pristow
Signature

by Vicki Maca
Deputy Director

May 30, 2013

Children's Justice Act Application

Introduction:

The Department of Health and Human Services, Division of Children and Family Services (CFS), shares the goals of the Children's Justice Act (CJA) in improving our response to reports of abuse and neglect. In 2010 the Division of Children and Family Services (CFS) centralized the Intake process to improve the consistency in screening of reports of abuse and neglect. Centralizing the Intake staff allows for more efficient training and ongoing monitoring and immediate feedback to CFS staff. In 2012, CFS adopted Structured Decision Making® for Intake use. This allows for increased consistency with information gathering and decision making. CFS continues to support the services and resources provided by the Child Advocacy Centers and their facilitation of the multidisciplinary team process for child abuse and neglect investigations. We believe that our goals and continuous improvement activities are consistent with the intent of the Children's Justice Act.

Over the past five years, CFS has experienced many changes which include restructuring. Nebraska has been able to evaluate all programs and is now focused on ensuring that they are structured to support the agency's goals and direction.

The Governor's Commission for the Protection of Children has served as the Nebraska State Task Force. The Commission is comprised of child welfare partners from numerous disciplines and also serves as one of the three Nebraska Citizen Review Panels. These dual roles have resulted in confusion about the information required from Governor's Commission members to satisfy the intent of CJA regulations. We also now understand that a Citizen Review Panel and the CJA Task Force should be separate and distinct commissions with separate and distinct roles. CFS is in the process of role clarification and intends to have this work completed by July 31, 2013.

Nebraska submitted a State Task Force three year assessment and recommendations in 2010 utilizing reports and recommendations prepared by our three Citizen Review Panels. The reports contained valid observations and recommendations related to CJA activities. Based on our understanding of the CJA Task Force requirements, Nebraska has decided to create a new CJA Task Force.

We are creating a separate CJA State Task Force which will assess practice and create new and improved analysis and recommendations for the three year period 2014-2016. We believe this will provide Nebraska a more comprehensive assessment of child welfare case practice. The newly created CJA Task Force will have no other oversight responsibility, and will be able to bring a different perspective, more focused review, and subsequent recommendations.

Task Force Development

A. CJA Task Force Coordinator: The new CJA Task Force coordinator will assure that the State Task Force comprehensively:

1. Reviews and evaluates State investigative, administrative, and the civil and criminal judicial handling of cases of child abuse and neglect, including child sexual abuse and exploitation, as well as cases involving suspected child maltreatment related fatalities and cases involving a potential combination of jurisdictions, such as intrastate, interstate, Federal-State, and State-Tribal; and
 2. Makes policy and training recommendations in each of the categories described in Section 107(e) of the Act. The Task Force may make other comments and recommendations they consider relevant and useful.
- B. Membership will be selected from child welfare partners across the state not currently serving in similar capacities. In addition to representatives on the list of required members, we are asking that three members be selected from the state/community at large, perhaps representing advocates for persons in poverty; persons working with the refugee populations; tribal representatives; and members of the faith community.
- C. Task Force committee meetings will be held at least quarterly, with the assessment and three year plan recommendations expected for submission with the May 2014 report.
- D. The Task Force will develop recommendations focusing on three specific categories identified in the Program Instruction:
1. Investigative, administrative, and judicial handling of cases of child abuse and neglect, including child sexual abuse and exploitation, as well as cases involving suspected child maltreatment related to fatalities and cases involving a potential combination of jurisdictions, such as interstate, Federal-State, and State-Tribal, in a manner which reduces the additional trauma to the child victim and the victim's family and which also ensures procedural fairness to the accused;
 2. Experimental, model and demonstration programs for testing innovative approaches and techniques which may improve the prompt and successful resolution of civil and criminal court proceedings or enhance the effectiveness of judicial and administrative action in child abuse and neglect cases, particularly child sexual abuse and exploitation cases, including the enhancement of performance of court-appointed attorneys and guardians ad litem for children, and which also ensure procedural fairness to the accused; and
 3. Reform of State laws, ordinances, regulations, protocols and procedures to provide comprehensive protection for children from abuse, including sexual abuse and exploitation, while ensuring fairness to all affected persons.
- E. Nebraska has focused effort and resources to improve the assessment and investigation of suspected child abuse and neglect cases, including cases of suspected child sexual abuse and exploitation, in a manner that limits additional trauma to the child and the child's family (see section on Child Advocacy Centers). Nebraska is working with the state Child Death Review Team to accurately review and count numbers of child deaths resulting from abuse or neglect or where abuse or neglect may have contributed to the child's death. We are also working to improve the assessment and investigation of cases of suspected child abuse and/or neglect related fatalities.

There are ongoing efforts to improve the investigation and prosecution of cases of child

abuse and neglect, including child sexual abuse and exploitation in collaboration with the courts through the Nebraska Supreme Court initiative called Through the Eyes of the Child. This initiative is endorsed on the state level by the Chief Justice of the Nebraska Supreme Court, and has local teams directed by local lead judges. The goal of this network of local teams is to improve practice at the local court level, while the state network strives to provide consistency in practice across the state. Team members include the judiciary, CFS staff, local attorneys, mental health and chemical dependency professionals, educators, Tribal representatives, foster parents and former foster youth, other child advocacy groups and community members. In addition to focusing on practice improvements, the Through the Eyes of the Child network also sponsors an annual Children's Summit conference to bring stakeholders together in order to share information from local initiatives and provide vision from across the state.

Nebraska is supportive of any interest the State Task Force has on the assessment and investigation of cases involving children with disabilities or serious health related problems who are suspected victims of child abuse or neglect. This has not been a primary focus in Nebraska, but CFS is interested in recommendations that the State Task Force has in this topic.

- F. Nebraska will support the development of a CJA specific task force by allocating funds to support a part time coordinator position and to support quarterly meetings, reimbursing members for mileage, lodging, meeting room rental and similar expenses necessary to support this Task Force.

Performance Report

The CJA Task Force (Governor's Commission for the Protection of Children) continues to identify areas needing improvement around screening and investigating reports of child abuse and neglect. In response to the recommendations, CFS continues to improve the intake process. Recommendations included:

- A. **Clarifying responsibilities on new intakes, especially for intakes on cases open for ongoing services.**

DHHS response: Using the Structured Decision Making® developed for intake, all intakes that meet the criteria to be accepted for assessment/investigation will be accepted and assigned to a CFS Specialist for contact with the family. Intakes that do not meet the screening criteria and are open for ongoing services will receive a response from the CFS Specialist or contractor's ongoing worker already assigned to the family.

- B. **Mandate that the Hotline worker include an explanation as to why allegations are not accepted for assessment; review previous assessments with unfounded findings; send notification to the appropriate county attorney in recently closed court cases if a new intake is received on the family; and accept for assessment as a new intake any report that follows a series of unaccepted reports on ongoing cases where it appears the safety plan is not working appropriately.**

DHHS response: CFS has provided direction to Hotline Staff on many of the recommendations outlined and have conducted Quality Assurance activities to monitor those tasks and improve performance. Based on information gathered from Quality Assurance reviews and anecdotal reports from individuals approved to review intakes, the following

improvements have been made: Hotline staff are now clearly documenting the reason a report is not accepted for assessment. In situations of reports on ongoing cases, Hotline staff are contacting the ongoing worker and others with knowledge of the case to determine if the safety issues are being adequately addressed. If the CFS Specialist cannot articulate a workable safety plan, the case is accepted and assigned to an Initial Assessment CFS Specialist for reassessment. Contacts with the worker and collaterals are documented in the intake narrative.

- C. **Fully assess any concerns that do not rise to the level of a new accepted intake; identify a specific location for documentation of any actions taken on these open cases; and improve timeliness of documentation.**

DHHS response: Supervisors continue to work with staff about documenting their actions in response to screened out intakes on their open cases. Changes are pending to the computer documentation system to add additional narrative locations. Timeliness of documentation has improved, but will continue to be a focus of local office supervisors.

- D. **Local supervisors should review all screened out intakes.**

DHHS response: Policy requires that all screened out intakes are reviewed by Intake supervisors within three days. These intakes are also provided to Law Enforcement for their consideration. The Quality Assurance Review includes a random sample of screened out and accepted intakes to determine that intakes are correctly accepted, the priority is accurate to provide timely response based on safety, and that correct decisions are made. While there may be advantages for local supervisors to review the screened out intakes because of their knowledge of families in their communities, it has not been feasible to do so.

- E. **Training on findings is needed.**

DHHS response: The Department agreed with this recommendation and has initiated a workgroup composed of local service area and Central Office staff, training unit staff, and a Department attorney to address this issue. Concerns are being identified and recommendations will be developed. Training will also be developed based on the recommendations. This issue will not be easily resolved, and may require legislative changes.

- F. **DHHS should increase communication with prosecutors and county attorneys.**

DHHS response: Legislation passed in the 2012 legislative session requires improved communication between the legal system and DHHS staff through the investigative and treatment team process. Additional case reviews by team members are required resulting in greater information sharing. Additionally, Service Area Administrators continue to work to enhance relationships with their local county attorneys and courts.

- G. **Child Advocacy Center coordinators should continue to review 4+ screened out intake reports.**

DHHS response: Additional resources were provided by the Legislature in order for this project to continue. The Child Advocacy Centers are now reviewing cases that have two or more consecutive screened out reports of child abuse or neglect.

CJA funds from last year's grant supported the following activities:

- A. **Nebraska Children and Families Foundation for the support of the Court Appointed Special Advocate (CASA) program. \$39,687**

Funding CASA supports the investigation and prosecution of cases of child abuse and neglect, including child sexual abuse and exploitation by providing a child advocate,

especially in areas of the state where guardians ad litem are not always available. This program allows there to be a voice in the court representing the child and brings a different perspective of the child's situation to the attention of the court. CASA's are there to support the child if the child's testimony is needed, and to help the child understand the legal and child welfare processes.

The Nebraska CASA program served 1,326 children in 22 local programs across 36 counties in the state. The Nebraska program supports and trains 634 volunteers. CASA volunteers provide a committed and consistent voice for children in the juvenile court system. Research indicates that children with CASA representatives have more services ordered and provided; have fewer foster home placements and appear less likely to reenter the foster care system once their case is closed. Children with a CASA volunteer reportedly spend an average of four fewer months in out of home care.

While such funding met the CJA goals, this year, we are asking CASA to provide a proposal for funding that is more closely aligned with Department initiatives, as well as with the intent of the CJA grant. The proposal will be reviewed and decision made if CJA funds can support the request.

B. Nebraska Alliance of Child Advocacy Centers \$63,322

The Nebraska Alliance of Child Advocacy Centers is comprised of the seven accredited Child Advocacy Centers located across Nebraska. The Alliance provides training across the state in child abuse and neglect related topics such as investigative procedures, successful prosecution, roles and responsibilities, child development and family dynamics, recognition of abuse and neglect, and mandatory reporting responsibilities. During calendar year 2012, a total of 8,524 professionals received training in child abuse and neglect issues, a 5% increase from 2011. Professionals trained included Child Advocacy Center employees (5%), child welfare staff (12%), law enforcement (4%), legal (2%), medical (14%), mental health (15%), school personnel (22%), and others (26%). Three hundred sixty-five trainings were provided in state and 16 were held out of state. Attached is the 2012 Training Report from the Nebraska Alliance of Child Advocacy Centers

C. Child Advocacy Centers \$30,614

Child Advocacy Centers serve abused children through a comprehensive approach to services for victims and their families. Child Advocacy Centers facilitate coordination of investigation and intervention services by bringing together professionals and agencies as a multidisciplinary team to create a child focused approach to child abuse cases. Key components of each child advocacy center include forensic interviewing, medical evaluations, advocacy and support, therapeutic intervention, case review and tracking. The goal is to reduce the number of interviews of the child, and to provide a "one stop" location for necessary services and interventions.

Nebraska has seven Child Advocacy Centers, all of which are fully accredited by the National Alliance of Child Advocacy Centers. Located across the state, centers include:

- Bridge of Hope in North Platte
- Capstone in Scottsbluff
- Central Nebraska Child Advocacy Center in Grand Island

- Lincoln Child Advocacy Center in Lincoln
- Family Advocacy Network in Kearney
- Northeast Nebraska Child Advocacy Center in Norfolk
- Project Harmony in Omaha

Child Advocacy Centers have been used consistently in situations of child sexual abuse since their development. Over the last three years there has been an emphasis on using center services more often in cases of serious physical injury, domestic violence and child death cases. Hotline staff have been trained to identify situations when it is appropriate for child advocacy center involvement and consultation. The computer system has been modified to provide a statement on the Intake Worksheet when the need for a Child Advocacy Center has been identified. Additionally, Child Advocacy Center coordinators facilitate weekly, monthly or quarterly multi-disciplinary team meetings to review cases and address systems issues. Teams are now functioning to include all 93 Nebraska counties.

In calendar year 2012, forensic interviews were conducted with 3,516 alleged child victims of abuse or neglect. Medical exams were provided to 1,033 children. Victim advocacy services were provided to 8,679 child victims and their siblings. Child Advocacy Center staff facilitated over 10,809 multi-disciplinary case reviews.

In the 2012 Legislative session, a bill was passed which provided additional funding for Child Advocacy Centers to expand their case review process. Child Advocacy Centers across Nebraska are now reviewing non-court involved child abuse and neglect cases to assure that children in cases without court oversight are receiving necessary services.

D. Attendance at the Children’s Justice Act Annual Conference: \$2,500

Travel and per diem expenses for two Nebraska representatives attendance at the annual conference was estimated to be approximately \$2,500.

Proposed Use of Requested Funding FY2014

As Nebraska supports the CJA Task Force three year plan, we will continue to work to strengthen the work and support the Child Advocacy Centers in their role of training and providing support and investigative expertise in child sexual abuse/assault, domestic violence, serious injuries and child death cases.

A. State Task Force Coordinator \$25,000

Funding will be used for the State Task Force Coordinator’s time in planning and organizing meetings, meeting room costs, travel and expenses for participants as described in Section A Task Force Development.

B. Nebraska Alliance of Child Advocacy Centers \$60,000

The Nebraska Alliance of Child Advocacy Centers serves two primary functions: 1) to arrange and provide training to professionals working with issues of child abuse and neglect and (2) to coordinate the multidisciplinary teams. Multidisciplinary teams are comprised of county attorneys, law enforcement, Department staff, medical providers, and others as needed. Training has a significant impact on the recognition, response and treatment of child

abuse in Nebraska. In addition, training is an opportunity to impact the multidisciplinary approach to child abuse investigations, facilitate communication between professional groups, and increase the capacity of each organization to better respond. These have been the objectives of previous expenditures and the number of professionals trained on a yearly basis demonstrates the success of this partnership.

Each Child Advocacy Center has a coordinator who facilitates the multidisciplinary teams to ensure information sharing on critical child abuse investigations and treatment. As a result of case coordination, the Child Advocacy Centers have become instrumental at identifying training needs of local team members.

The Nebraska Alliance will have a full time coordinator who will provide technical assistance to the Alliance and members including facilitation of meetings, organizational technical assistance and grant writing. This coordinator will assist regional Child Advocacy Centers in identifying training needs, and in developing an individual training plan for the counties they serve. The coordinator will also prepare quarterly activity and financial reports.

Objectives:

- Increased opportunities for professionals and community members to participate in child abuse/neglect and safety/risk related trainings. At least 10 trainings will be offered annually in each of the seven Child Advocacy Centers areas of responsibility.
- Increased knowledge of child abuse and neglect dynamics to improved investigations of child abuse allegations. Ninety percent of trainings offered will address agency roles in investigating allegations and assessing safety and risk.

Budget: Funds will be used for partial payment of training costs which include coordination and administrative support, training materials and presenter costs, and occupancy.

Training Evaluation Feedback: An evaluation form will be completed by participants for all trainings provided by the Child Advocacy Centers. Feedback from participants will be used by the Alliance to improve the training offered and to identify additional training needs.

C. Nebraska Child Advocacy Centers \$35,748

Nebraska will use CJA funds to continue to support the seven accredited child advocacy centers located across the state. As described above, the Child Advocacy Centers are used for most sexual assault cases. Staff are utilizing the Child Advocacy Centers more frequently for serious physical abuse cases, domestic violence situations, and child fatality and near fatality cases.

Objectives: **1)** To provide a “one stop” child friendly facility in which interviews of alleged child victims can be conducted and videotaped, provide medical evaluations and treatment, and provide emotional support for victims, siblings and the non-offending parent; **2)** To facilitate multidisciplinary team response for children alleged to be child victims of abuse and neglect.

Budget: Funding will provide partial support to Child Advocacy Centers to provide forensic interviews, medical exams, and advocacy for victims, siblings and non-offending parents.

Evaluation Feedback: Monthly reports of services are provided. Centers will do periodic satisfaction surveys with families, law enforcement, county attorneys and others involved in cases of abuse or neglect.

D. Child Death Investigation Training \$10,000

Nebraska will use CJA funds to contract with a former law enforcement officer to provide comprehensive training in child death investigations to local law enforcement agencies across the state. The Attorney General's Office developed a child death investigation protocol and documentation form that was distributed to law enforcement agencies, but did not have funding to provide regional training to officers. Currently, use of the protocol and form is very low. Local law enforcement training budgets are limited, and instances of child death are infrequent in rural areas, resulting in the fact that many officers have had little or no training or experience in investigating child deaths. Regional trainings will be provided in Omaha, Lincoln, Norfolk, Grand Island, North Platte and Scottsbluff to serve the entire state. It is anticipated that the trainings would be provided in one six hour day. Law enforcement officers are now required to earn continuing education credits and it is expected that these trainings will be well attended. The Nebraska Law Enforcement Academy will post announcements about the training opportunities on their website, and it is expected that local law enforcement agencies will host these training events at no cost.

Objectives: 1) Provide training in child death investigations to local law enforcement officers across Nebraska; 2) Provide training on the Attorney General's Child Death protocol and form.

Budget: Funding will be used for curriculum development, compensation, hotels, food and mileage for trainer(s).

Evaluation Feedback: Participants will complete an evaluation form at the end of each training session to assess quality of training provided and to identify areas for improvement.

E. Court Appointed Special Advocates (CASA) in Nebraska \$5,947

The CASA program will help reduce the amount of time children who are in the court system due to abuse and neglect spend in out of home care. Research indicates a child without a CASA volunteer spends on average over eight months longer in foster care. Other studies indicate that a child with a CASA volunteer is more likely to find a safe, permanent home; more likely to be adopted, half as likely to re-enter foster care; substantially less likely to spend time in long-term foster care; and more likely to have a plan for permanence. CASA volunteers improve representation of children; reduce the time needed by lawyers; are more likely than paid attorneys to file written reports; are highly effective in having their recommendations adopted by the court; and in nine categories were rated more highly than attorneys by judges surveyed.

Objectives: 1) Increase the amount of volunteers serving abuse and neglected children in the court system in Douglas County. 2) Increase the amount of volunteers serving abused and neglected children in the court system in Sarpy County. 3) Increase the amount of volunteers serving abused and neglected children in the court system in Lancaster County.

Budget: Funding will provide partial support for Volunteer Coordinators (3 at .5 FTE \$46,800). (The CASA Program has \$50,544 in kind support for benefits, taxes, office space, equipment and supplies.)

Evaluation Feedback: Outcomes will be judged based on the number of new volunteers recruited and trained and the number of additional children served.

Task Force Review:

Nebraska will use the State Task Force to review the reports from each of the projects funded with CJA dollars to assure that each activity furthers implementation of Task Force recommendations.

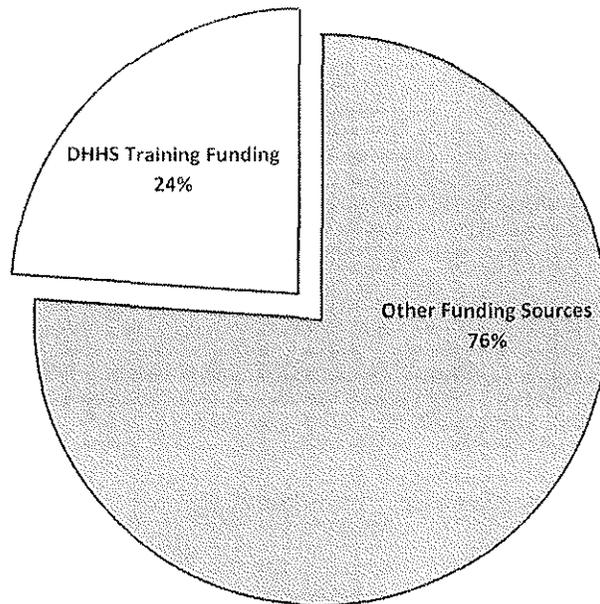
Nebraska believes that the above initiatives are closely aligned with the goals of CJA grant funding and will continue our efforts to improve Nebraska's response to allegations of child abuse and neglect.

2012 Training Report

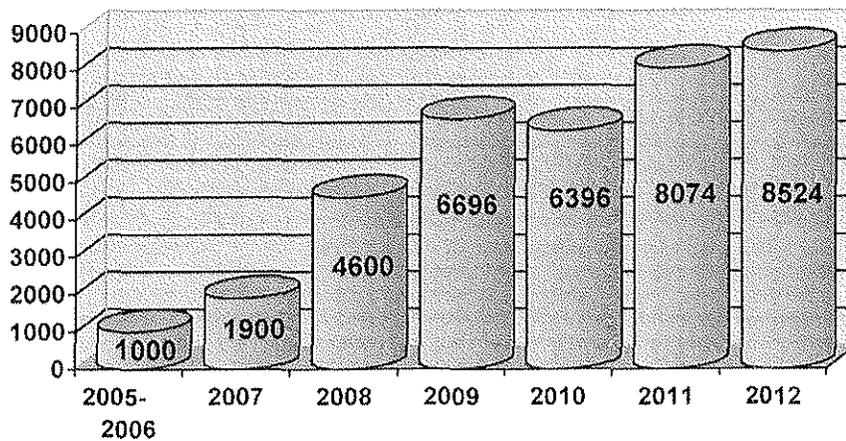
During 2012, the DHHS training contract helped support funding for approximately 2,050 professionals or 24% of those trained.

The CACs provided 381 trainings. 365 of the trainings were held within the state and 16 were held out of state. A total of 8,524 professionals were trained. 5,781 professionals (68%) of the professionals were trained by Project Harmony. 1,022 professionals (12%) of them were trained by the Lincoln Child Advocacy Center.

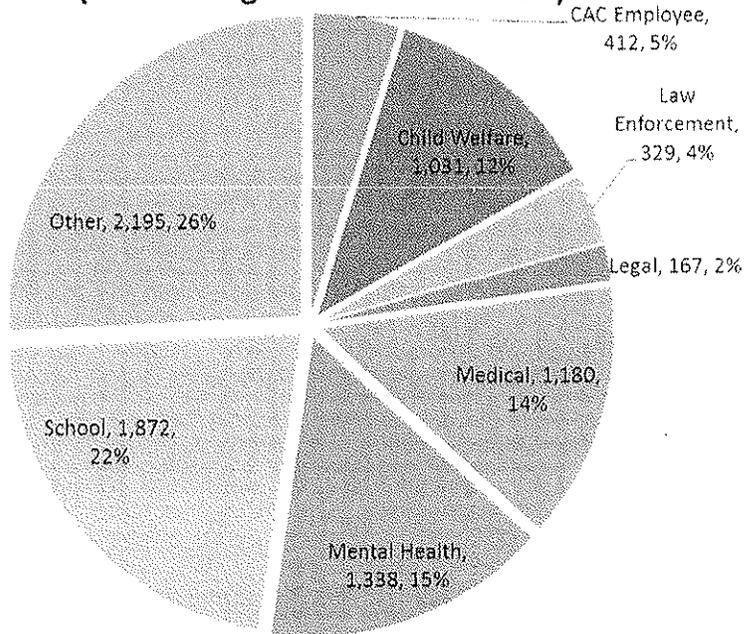
Training Funding Utilized by CACs in 2012



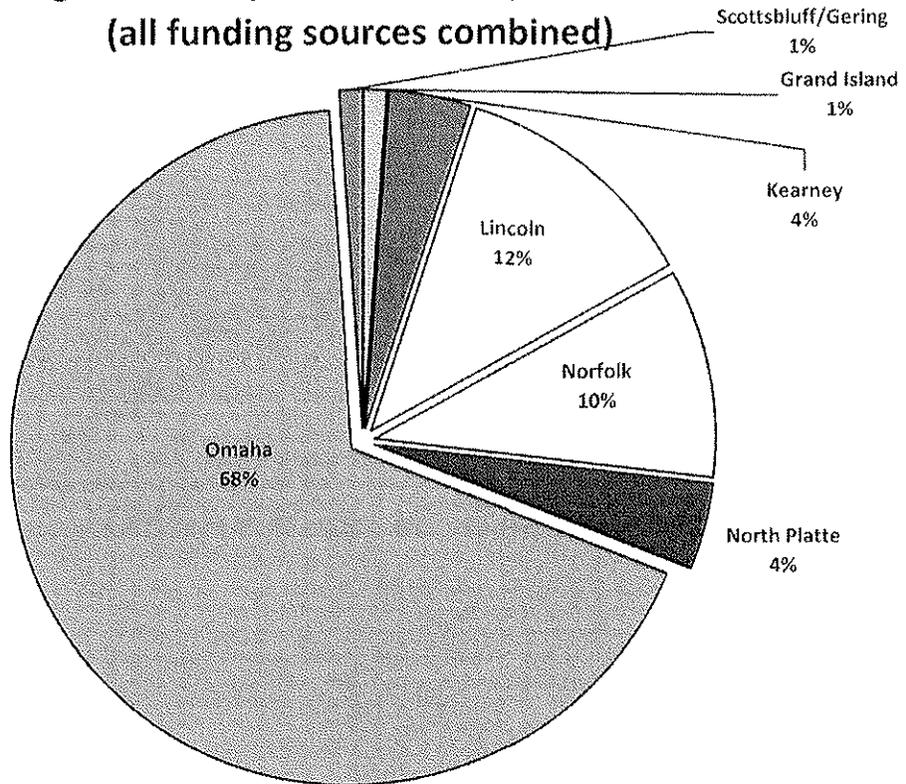
Total Nebraska Professionals Trained by CACs (all funding sources combined)



**Types of Professionals Trained
in 2012 by the CACs
(all funding sources combined)**



**Percentage of Participants Trained by Each CAC in 2012
(all funding sources combined)**





Dave Heineman
Governor

STATE OF NEBRASKA

OFFICE OF THE GOVERNOR
P.O. Box 94848 • Lincoln, Nebraska 68509-4848
Phone: (402) 471-2244 • dave.heineman@nebraska.gov

May 31, 2013

Bryan Samuels, Commissioner
Administration on Children, Youth and Families
1250 Maryland Avenue, S.W., 8th Floor
Washington, DC 20024

Dear Commissioner Samuels:

Following please find the required certifications for Nebraska's application for the Children's Justice Act Funds.

1. The State received the FY 2011 child abuse and neglect Basic State Grant and continues to comply with the requirements stipulated in Section 106(b) of the Act; and
2. The State has maintained a State multidisciplinary task force on children's justice; and
3. The State has adopted or continues to progress in adopting recommendations of the State Task Force or a comparable alternative to such recommendations; and
4. The State will make such reports to the Secretary as may reasonably be required, including an annual report on how assistance received under this program was expended throughout the State, with particular attention to the areas described in paragraphs (1) through (3) of Section 107(a); and
5. The State will maintain and provide access to records relating to activities under CJA; and
6. The State will participate in at least one federally initiated CJA meeting each year that the grant is in effect and are authorized to use grant funds to cover travel and per diem expenses for two CJA representatives (CJA Coordinator and Task Force Chairperson) to attend the meeting.

If you have any questions, please contact Suzanne Schied at (402) 471-9245 or Suzanne.schied@nebraska.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dave Heineman".

Dave Heineman
Governor

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated fund have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of an Federal loan, the entering into of any cooperative agreement and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying" in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, US. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Signature

Thomas D. Prustow

Director

Division of Children and Family Services

Nebraska Department of Health and Human Services,

by Vicki Maca

Deputy Director