Program Narrative

System Description: Structure and Function of the Juvenile Justice System

The Idaho Juvenile Corrections Act of 1995 was based on the philosophy of the Balanced Approach, addressing juvenile offending by focusing on community protection, offender accountability and competency development in the context of the offender, the victim, and the community. The Act encompasses day treatment, community programs, observation and assessment programs, probation services, secure facilities, after-care, and assistance to counties for juvenile offenders not committed to the custody of the department of juvenile corrections. The Idaho juvenile justice system is based on the concept that juveniles are developmentally different than adults and require a different approach. Idaho's system is responsive to issues of mental illness, traumatic experience, and gender.

The Idaho juvenile justice system is bifurcated between county and state governments. Idaho has a unified state court system and the state also administers juvenile correction facilities. Prosecution, indigent defense, probation, and detention are all county functions.

Analysis of juvenile delinquency problems (youth crime) and needs

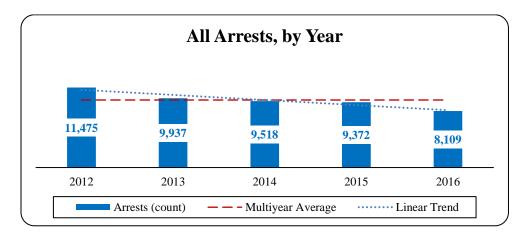
Idaho is a vast state covering over 82,000 square miles with a total population of only 1.7 million. On average, Idaho has only 20 people per square mile compared to the national average of 91. Idaho was the fastest growing state in 2017 with a growth rate of 2.2%. Median income for households in Idaho is 11% below the national average.

Unless otherwise cited, the information in this crime analysis comes from Begic & McDonald (2018). *Analysis of 2012-2016 Idaho juvenile arrest data, including incidences*Page | 1

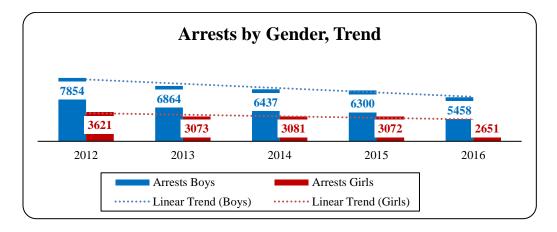
of petitions, commitments to IDJC, and detention bookings. Boise, ID: Center for Health Policy, Boise State University. The full analysis is attached in Appendix A.

Arrests

The 10-17 year-old population in Idaho increased over 5% from 2012 – 2016, however juvenile arrests declined over 29% in that same time period.

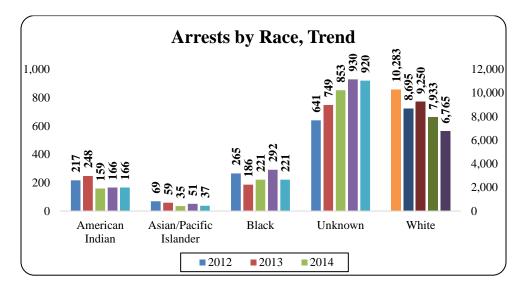


Whereas the overall rates at which boys and girls were arrested remained relatively stable over the years, the overall reduction in the number of arrests from 2012 to 2016 was greater for boys (30.5%; average annual reduction rate was 6.1%) than girls (26.8%; average annual rate of reduction was 5.4%).



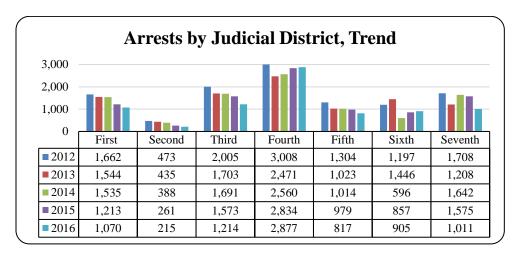
The rate at which juveniles from each racial group were arrested evidenced an overall decrease from 2012 to 2016 (see Figure 3). The only exception was the $Page \mid 2$

"Unknown" group, which evidenced an overall increase of 43.5% (average annual increase was 8.7%) in the rate of arrests over the same period.

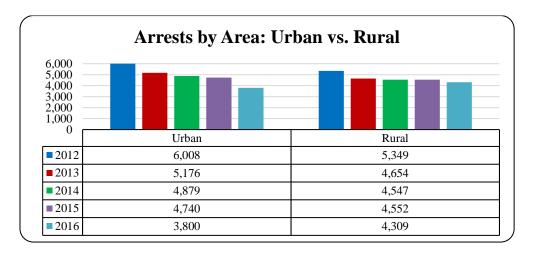


Juveniles of non-Hispanic origin accounted for nearly 75% of all arrests, with juveniles of Hispanic origin accounting for just over 15%. Ethnicity was unknown in 10% of all arrests, and a total of 17 arrests for which ethnicity was not recorded were excluded from this analysis.

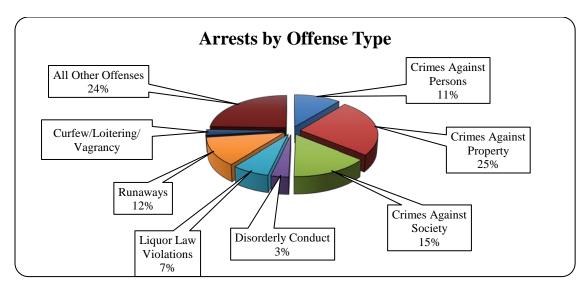
The analysis of arrests by judicial districts revealed that the greatest proportion of arrests across all years occurred in the Fourth Judicial District (overall, nearly 29% of all arrests occurred in this judicial district). The lowest proportion of arrests across all years occurred in the Second Judicial District (less than 4%).

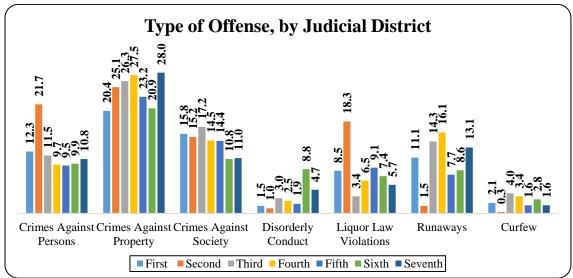


Overall, the proportions of arrests were nearly evenly split between the urban (just over 51% of all arrests occurred in the eight urban counties) and the rural. Although a steady decline in the numbers of arrests was observed in both urban and rural areas over the years, the overall rate of reduction from 2012 to 2016 was nearly twice as high in the urban areas (36.8%; average annual rate of reduction was 7.4%) than the rural areas (19.4%; average annual rate of reduction was 3.9%) of the state (nearly 49% of all arrests occurred in the remaining rural counties) areas.

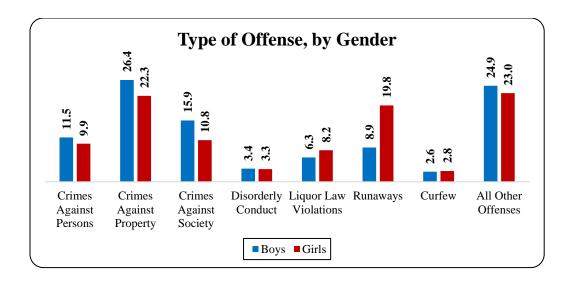


Classification of offenses utilized by the Idaho State Police was used for the purposes of the analysis of arrests by offense type. As seen below in Table 8 and Figure 8, arrests for type "A" offenses (crimes against person, property, or society) accounted for approximately half of all arrests, with arrests for crimes against persons occurring with the greatest frequency (approximately 25% of all arrests were for crimes against persons). If arrests for offenses classified as "all other offenses" are excluded (over 24% of all arrests), the single most frequently occurring type "B" offense for which juveniles were arrested was runaway (over 12% of all arrests were for runaways).

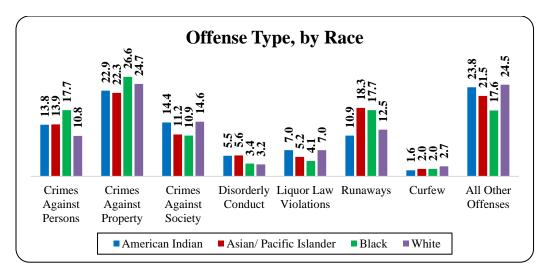


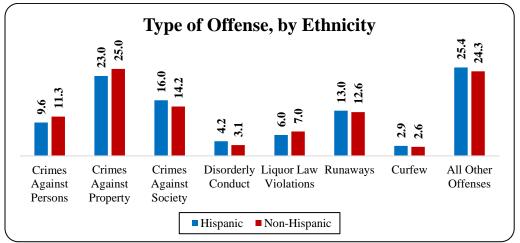


Boys were more frequently arrested for crimes against property (over 26%; compared to over 22% for girls), all other offenses (just under 25%; compared to 23% for girls), crimes against society (just under 16%; compared to nearly 11% for girls), and crimes against persons (nearly 12%; compared to just under 10% for girls), whereas girls were arrested considerably more frequently for runaways (nearly 20%; compared to just under 9% for boys) and somewhat more frequently for liquor law violations (over 8%; compared to over 6% for boys). The proportions of arrests for disorderly conduct and curfew violations were very similar for boys and girls (both at approximately 3%).



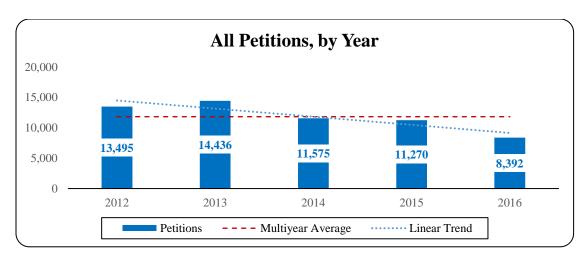
Overall, Blacks (nearly 18%) were arrested more frequently for crimes against persons than juveniles from any other racial group. Whites and American Indians (nearly 15% and over 14%, respectfully) were arrested more frequently for crimes against society than American Indians (just over 11%) and Blacks (just under 11%). American Indians and Asians/Pacific Islanders (nearly 6% each) were arrested with somewhat greater frequency for disorderly conduct than either Blacks or Whites (approximately 3% each). American Indians and Whites (7% each) were arrested for liquor law violations with somewhat greater frequency than Asians/Pacific Islanders or Blacks (just over 5% and just over 4%, respectively), and American Indians Asians/Pacific Islanders and Blacks (approximately 18% each) were arrested more frequently for runaways than either Whites (nearly 13%) or American Indians (just under 11%). No notable differences were observed in terms of arrests for curfew violations.

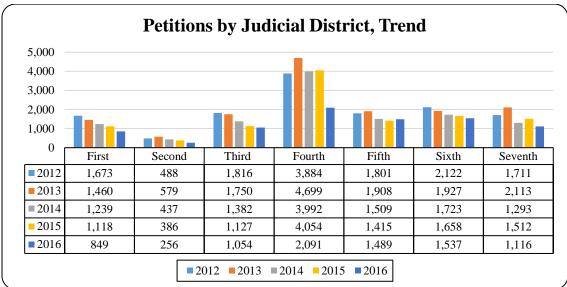




Petitions

A total of 59,168 petitions were documented between 2012 and 2016. The greatest proportion of petitions was documented in 2013 (nearly 32%), and the lowest proportion was documented in 2016 (just over 4%). An overall reduction in the number of petitions from 2012 to 2016 was observed for each of the seven judicial districts (see Figure 34). However, notable variations were observed both within each judicial district (particularly in the Fourth, Fifth, and Seventh judicial districts) as well as in the overall rates of reduction in the number of petitions across individual judicial districts.



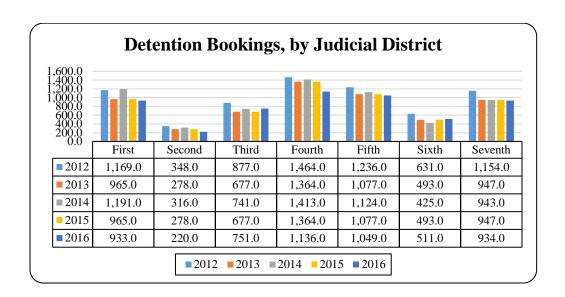


Detention

The analysis of detention bookings by judicial districts revealed that the greatest proportion of bookings across all years occurred in the Fourth Judicial District (overall, over 22% of all bookings occurred in this judicial district). The lowest proportion of detention bookings across all years occurred in the Second Judicial District (less than 5%). The remaining judicial districts accounted for anywhere between 9% and 18% of all bookings.

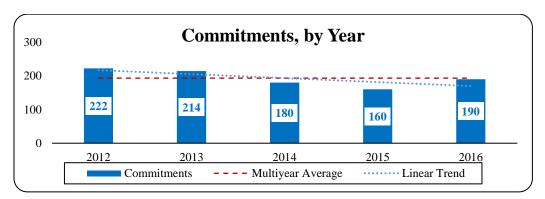
When proportions of bookings were examined across racial/ethnic groups, it was observed that the proportion of juveniles who were White decreased from 2012 to 2013 (a reduction of 15.2%), and then remained relatively steady over the remainder of the years. Similarly, the proportion of juveniles who were American Indians also decreased in the same period (a reduction of 40.3%). On the other hand, the proportion of Hispanics considerably increased in the same period (an increase of 140.9% from 2012 to 2013), remaining relatively steady between 2013 and 2016. The activities in this plan with DMC will provide the critical information to begin assessing the increase in Hispanic youth and target an area for priority.

Although the percentages of boys and girls who were detained varied somewhat across individual years, boys were booked at a significantly greater rate than girls both in each individual year as well as across all years (nearly 73% of all bookings were of boys, and approximately 27% were of girls).

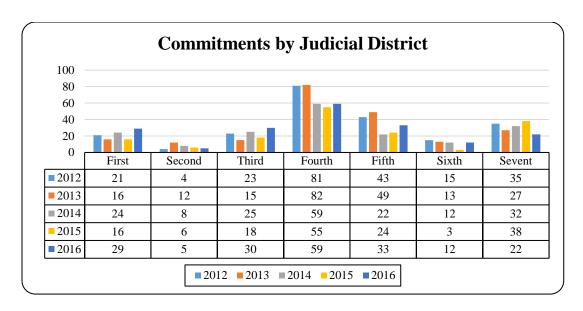


State Commitment

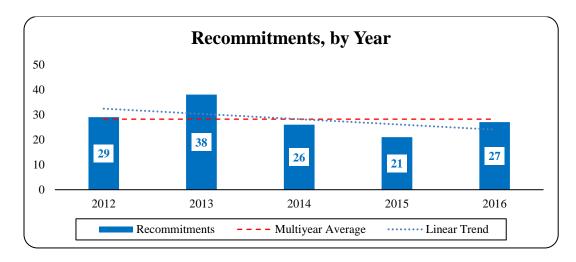
Although an overall decline is observed in the rate of commitments (overall reduction in the rate was 14.4%; average annual rate of change was 2.9%), a deviation in the trend was evidenced in 2016; whereas a steady decline was observed from 2012 to 2015, the number of commitments suddenly increased in 2016. The numbers of commitments varied greatly across the years within each judicial district. Whereas the Seventh (overall rate of change from 2012 to 2016 was 37.1%), Fourth (27.2%), Fifth (23.3%) and Sixth (20.0%) judicial districts evidenced a reduction in the overall rates of commitments, the First, Third and Second judicial districts evidenced an overall increase in the rate of commitments in the same period (38.1%, 30.4%, and 25.0%, respectively). When the numbers of commitments and the numbers of recommitments were compared, it was observed that the numbers of commitments were consistently and considerably higher than the numbers of recommitments (Figure 40). Likewise, the numbers of releases were consistently and considerably higher than the numbers of recommitments. On the other hand, the numbers of commitments and releases were generally similar across the years, with some variations. Whereas the numbers of commitments and releases were nearly identical in 2012 and 2013, the numbers of releases exceeded the numbers of commitments in 2014 and 2015; conversely, the numbers of commitments surpassed the numbers of releases in 2016.



Page | 10



The number of juveniles released from state commitment and then recommitted has remained relatively stable with fluxuations in individual years. The fact the trend is relative flat lends to the priority of improving reintegration services.



Education Systems

Graduation rates in the state are increasing, however virtual and alternative schools have the lowest graduation rates. The Idaho State Department of Education is investing in a new system of support called the STAT team to serve schools with low graduation rates.

According to data in the Idaho Incident Based Reporting System, simple assault and narcotic crime represent a notably larger percentage of school-based crimes than non-school based crimes. ¹ Females, American Indians, and Black students are overrepresented as the victims of school-based crime.

School Resource Officers (SRO) play a critical role in many school districts throughout the state with nearly 63% of primary and secondary schools having access to SRO's. The presence of an SRO in rural agencies is linked with higher rates of suspensions and referrals to law enforcement than agencies without SRO's, however the ratio of time spent on essential elements of SRO duties: educating, mentoring, enforcing; is also related to these rates.² Schools and SRO's are actively learning and employing restorative justice techniques as alternatives to suspension and referral to the juvenile justice system. The activities in this plan under compliance monitoring and restorative justice seek to empower schools and law enforcement to create systemic improvements.

Juveniles committed to state custody increased skills in reading and math averaging growth of more than 2 grade levels. Over 87% of all students demonstrated improvements. Educational milestones included 43% of juveniles earning G.E.D. certifications, 22% high school diplomas, 66% workplace certificates, and 10% college credits.³

¹ Idaho State Police, School Based Law Enforcement in Idaho, 2016

² Ibid

³ Idaho Department of Juvenile Corrections

Parent Engagement

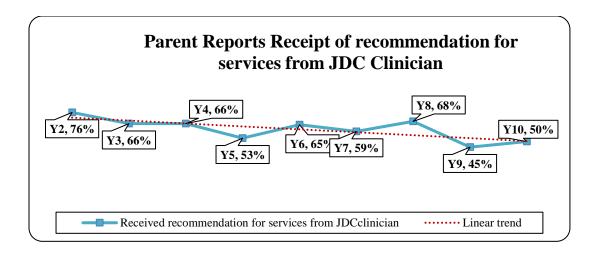
Parent engagement is critical to the success of juvenile offenders. The average for parent participation in staffings for juveniles in state custody is approximately 70% ranging from low 60's to 100% over the past 8 years.

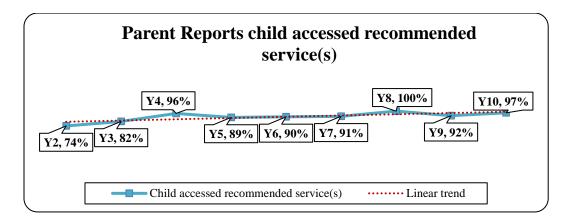
The Detention Clinician project evaluation recorded surveys of parents for youth served in the program over a 9-year period. A survey of parents of recently released juveniles who had been given at least one provisional diagnosis of a MH or SA problem by the JDC clinician while detained in the JDC was conducted in all evaluation years. Part of the protocol used by JDC clinicians is to provide each provisionally diagnosed juvenile who was being released with at least one recommendation for services, and then to follow up with each juvenile's parent by telephone 15-45 days after release.

Despite the fact 100% of the parents received a report from the clinician regarding recommended services when the juvenile was released from the facility, less than half recall receiving such recommendations. Of those parents acknowledging they received recommendations, over 90% reported the juvenile accessed services. These dynamics highlight the importance of parent engagement.⁴

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⁴ McDonald and Begic, Parent Survey Data 2018



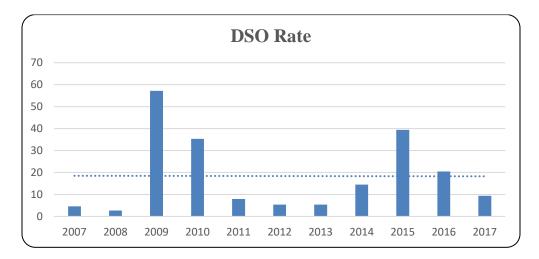


Core Requirements of the JJDPA

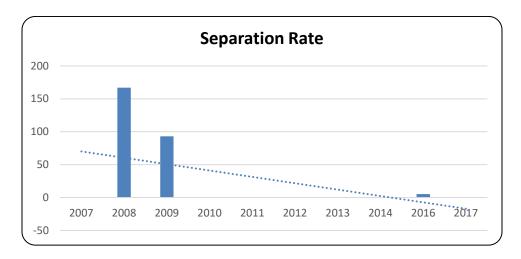
Idaho has participated in the Juvenile Justice and Delinquency Prevention Act since 1975. There was just one year during this time that the state was not in compliance with all four core requirements. The state will again be out of compliance with the Deinstitutionalization of Status Offenders requirement this year, but it should be noted that the state would have been in compliance under previous standards. The state's commitment to ensuring the protections of the JJDPA is absolute.

A ten year review shows the rate of violations of the Deinstitutionalization of Status Offenders (DSO) requirement shows a relatively flat trend. Spikes in violations in

specific years were the result of changes in policy and projections and not necessarily increases in the numbers of violations.⁵



The state maintains compliance with the Separation requirement. The following graph shows the ten year trend. Data for 2015 was omitted due to changes in policy guidance that led to anomalous information vastly differing from all other years of reporting.

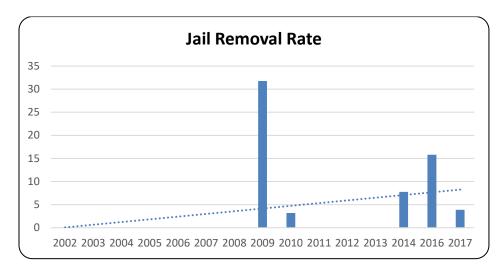


The state has fluctuated with the jail removal rate as guidance around programs such as scared straight varied in different years. Projection methods to account for non-

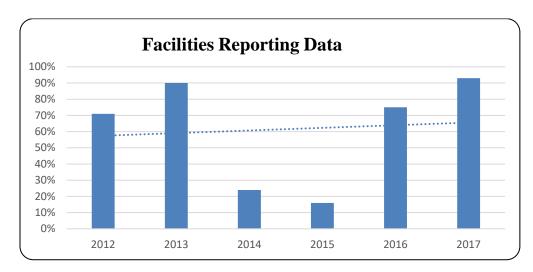
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⁵ Idaho Department of Juvenile Corrections Page | 15

reporting facilities also impacted the state's rate in some years. The state achieved a 97% reporting rate for the 2017 compliance report.



The state collects information from facilities that could temporarily house juveniles to monitor compliance with core requirements. The state reduced efforts to collect data in some years pending resolution of draft rules and regulations and interpretations of existing rules. As mentioned earlier, the state received data from 95% of facilities required to report for the 2017 reporting period.⁶

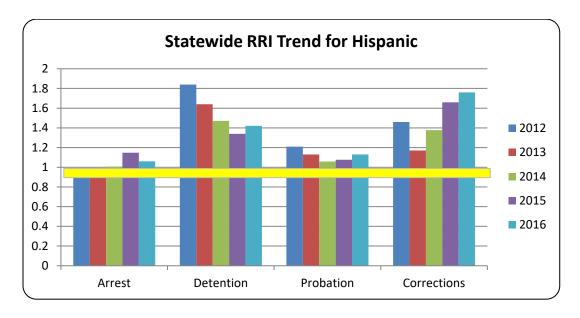


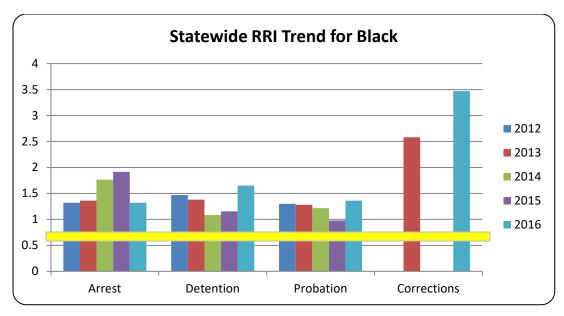
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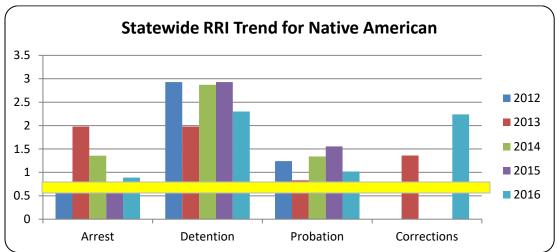
⁶ Ibid

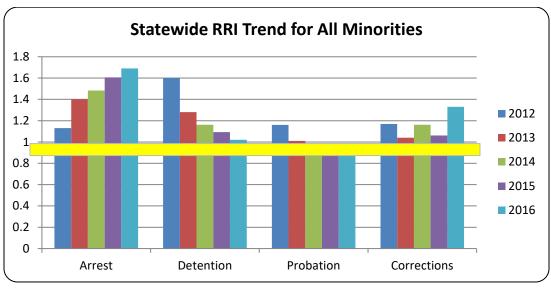
Disproportionate Minority Contact

Idaho monitors activities at various points in the juvenile justice system to identify and investigate any possible instances of overrepresentation of specific populations. Factors impacting possible overrepresentation are highly localized in Idaho due to the structure of the system. Small population numbers impact statistical analysis and can lead to large changes in Relative Rate Index (RRI) data from year to year. The state engages with communities where RRI data indicates an opportunity for further investigation and partners to perform assessment, strategic planning, and system improvements.









Goals and Objectives

The goals of the Idaho State Plan were informed by community forums led by local Juvenile Justice Councils. The Idaho State Advisory Group (SAG) identified and prioritized common elements within the Council plans. The goals of the plan are listed in order of priority as follows:

Goal #1: Idaho is in compliance with DSO standards. (Title II Purpose Area 20,Deinstitutionalization of Status Offenders)

Objective A: Reduce DSO violations by enhancing partnerships and developing effective alternatives to secure confinement.

Goal #2: Idaho is in compliance with the Core Requirements of the JJDP Act. (Title II Purpose Area 19, Compliance Monitoring)

Objective A: Gather data from at least 85% of facilities required to report.

Objective B: Increase the number of jurisdictions in compliance.

Goal #3: Idaho maintains a juvenile justice system that is fair and impartial to all populations. (Title II Purpose Area 21, Disproportionate Minority Contact)

Objective A: Complete implementation phase in Bingham County.

Objective B: Begin evaluation for Bingham County project.

Objective C: Identify another community for targeted activities.

Goal #4: The Idaho juvenile justice system employs youth/adult partnerships to inform systemic improvements. (Title II Purpose Area 27, Juvenile Justice System Improvement)

Objective A: Develop an orientation and application process so the Idaho Juvenile

Justice Youth Committee is effective, aware, and sustainable.

Members know their role and are actively involved.

Objective B: Implement a survey of youth in custody.

Objective C: Implement Youth/Adult Partnerships and create online modules.

Goal #5: District and Tribal Juvenile Justice Councils champion effective approaches based on dynamics of local communities. (Title II Purpose Area 27, Juvenile Justice System Improvement; and Title II Purpose Area 24, Indian Tribe Programs)

Objective A: Support Juvenile Justice Action Plans through resources, coordination and technical assistance.

Goal #6: Restorative Justice Practices are employed in families, schools, and youth service systems. (Title II Purpose Area 27, Juvenile Justice System Improvement)

Objective A: Identify current Restorative Justice Practices across the state.

Objective B: Continue implementation of effective approaches.

Goal #7: Youth will experience successful reintegration into their communities following placement in state custody. (Title II Purpose Area 27, Juvenile Justice System Improvement)

Objective A: Improve family engagement and collaboration.

Objective B: Develop improvements in programming and processes.

Objective B: Support implementation of effective Restorative Justice Practices.

Goal #8: Effectively engage and invite families into collaborative process to enhance positive youth outcomes. (Title II Purpose Area 27, Juvenile Justice System Improvement)

Objective A: Review and analyze current family engagement activities.

Objective B: Support effective approaches and implement pilot projects.

Implementation (Activities and Services)

Idaho will employ a strategy of local control with statewide accountability. District and Tribal Councils will be allocated funds to implement their individual action plans. Specific activities for Councils include provision of training and technical assistance for stakeholders, collaborative system improvement projects, pilot projects, and youth/adult partnerships.

The SAG engages ad-hoc committees to oversee projects resulting from combinations of units of local government. These projects include training of trainers on evidence-based practices, training for juvenile justice professionals, pilot projects, and youth/adult partnerships. Compliance and DMC activities include data collection and analysis, training and technical assistance, oversight and monitoring, and program implementation. Administrative Activities to reach the goals and objectives of the statewide plan are:

- Perform compliance monitoring activities
 - Identify strategies to secure data from facilities

- Provide training and technical assistance
- Perform monitoring and oversight
- Develop an incentive program for adult lockups
- Conduct quarterly meetings of the State Advisory Group
 - Receive updates from Councils and Committees
 - Determine plan modifications as needed
 - Make budgetary decisions
 - Oversee training or project activities
- Conduct at least 6 Council meetings per year in each District
 - Implement Action Plans
 - Assign workgroups and monitor progress
- Conduct at least 4 Tribal Council meetings annually
 - Implement Action Plans
 - Assign workgroups and monitor progress
- Support quarterly and ad-hoc meetings for committees
 - Implement Action Plans
 - Assign workgroups and monitor progress
 - Make recommendations to the State Advisory Group

Population-specific plans

Gender Specific Services

A recent survey including responses from 16 counties and 4 regional detention facilities indicated nearly 30% have gender-specific programs in place currently. Respondents in very rural areas noted the lack of services in general as a challenge.

Programming for females includes Girls Circle, Our Girls, and Girls Empowered. Boys Council was noted as a primary gender-specific program for males. Survey respondents indicated needs for trauma-informed programming, healthy relationship and domestic violence programs, and male and female-specific groups.

Gender-specific services are supported with the Title II grant in Idaho through the local Council Action Plans. Councils determine the needs of the juveniles at a local community level and support system improvements to meet those needs.

The state engages in other efforts outside the Title II grant to meet the needs of juveniles through gender-specific services. The Detention Clinician program is supporting the implementation of Arise gender-specific programming in detention facilities throughout the state. IDJC administers the Community Incentive Program which provides resources for services to individual juveniles based on their unique characteristics – the funding follows each juvenile. Finally, juveniles in state custody are afforded a variety of gender-specific services and support through programming, staff training, medical care, and PREA protections.

Services in Rural Areas

The vast majority of Idaho can be considered rural or frontier. Every aspect of the Title II plan accommodates and considers the needs of rural communities and activities that service their unique needs. First and foremost, the state plan serves rural communities through the activities of local District and Tribal Juvenile Justice Councils. Each Council includes representatives throughout the jurisdictions and collaboratively develop and implement plans that service the local needs.

The state also supports services in rural areas outside the Title II grant. The Community Incentive Project provides resources to counties and tribes to purchase services for individual juveniles. This program also provides resources to transport providers and/or juveniles and their families to access services. Finally, the department employs Liaisons who dedicate their time to local stakeholders to identify needs and bridge gaps in services.

Mental Health Services

Within the Title II grant, mental health services would be addressed within the District and Tribal Council Action Plans. The SAG did not identify mental health services as a priority in this plan because Idaho is undergoing a massive transformation of the children's mental health system and our sister agency, the Idaho Department of Health and Welfare, is coordinating major systemic changes.

IDJC supports mental health services for juvenile offenders outside the Title II grant through the Community Incentive Program. This program is separated into three distinct funding streams: Mental Health, Reintegration, and Community Incentive. The Mental Health funding stream fills gaps in services to treat juvenile offenders within their communities who have mental health issues. This is supplemental to the services within the child welfare system and Medicaid.

Consultation with units of local government

Idaho is a bifurcated system and relies heavily on cooperation and collaboration. The collaborative culture created by the Juvenile Corrections Act is centered on open communication and partnership. Within this Title II plan, activities of the State Advisory

Group and District and Tribal Councils are the primary means of consultation. The SAG is comprised of individuals representing units of local government, professional associations, tribes, and other organizations. Members enable an open exchange of ideas and plans. District and Tribal Councils include membership from the counties and tribes within the specific jurisdictions. Plans are developed and implemented to supplement and enhance local efforts. IDJC employs Liaisons to communicate directly with units of local government to ensure state/county/tribal partnerships are vibrant and effective. IDJC consulted with the Idaho County of Juvenile Justice Administrators on the plan to address any concerns. All of these resources were used in the development of this plan and will be involved in the implementation of activities.

Formula Grants Program Staff

The Grants Unit of the Community Operations and Program Services (COPS) Division manage the Formula Grants program. All staff are paid with state funding allocated to the department through state general funds. The IDJC Grants Unit manages the following programs:

- Title II Formula Grant
- Community Incentive Project
- Detention Clinician Program

Alan F. Miller, Juvenile Justice Specialist 80% of time dedicated to Title II

Duties: Support the SAG and oversee the development and implementation the state plan. Provide technical assistance to communities and supervise staff.

Jose Martinez, Program Specialist 10% of time dedicated to Title II

Duties: Develop grants, monitor, evaluate and report grant activities and provide training and technical assistance to users. Manage community incentive programs and the detention clinician project.

Lisa Stoner, Grants/Contracts Specialist 40% of time dedicated to Title II

Duties: Evaluate grant and contract applications and provide grant coordination and oversight, and provide technical assistance to stakeholders and sub-grantees.

Katherine Brain, Administrative Assistant 40% of time dedicated to Title II

Duties: Perform a wide variety of support functions and apply detailed program knowledge in developing program records and collecting information and provide liaison between management and other organizational units.

Chelsea Newton, Program Specialist

100% of time dedicated to Title II

Duties: Monitor compliance with the JJDPA core requirements. Develop policies and procedures, train stakeholders, monitor facilities, oversee compliance projects, develop action plans, and write reports. This position also coordinates DMC activities.

4. Plans for Compliance

Idaho submitted data and information on the Compliance and DMC plans on the online compliance reporting tool.

5. Statutory Requirements see Appendix I

6. Plan for Collecting the Data Required for this Solicitation's Performance Measures

The IDJC is committed to the collection and analysis of valid data to evaluate and improve juvenile justice programming. The IDJC requires sub-grantees to collect data on all performance measures required by OJJDP so there are consistent measures across funding streams. Sub-grantees may track additional measures relevant to local stakeholders. All sub-grantees follow the guidelines described below:

- Grant applicants are informed of data collection responsibilities in the application process and describe a strategy to meet these responsibilities.
- Grant reviewers verify proposed strategies are achievable and effective. Preaward negotiations or special conditions are implemented as needed.
- 3. IDJC staff provides training to all new grantees.
- 4. Grant recipients submit data to IDJC on a quarterly basis.
- IDJC staff review quarterly reports, verify data, and provide technical assistance to grantees to ensure valid data.
- IDJC staff enters data into the DCTAT reporting system annually to ensure consistent reporting across sub-grantees.

Projects managed by the state include evaluation components from the outset. All projects have specific performance measures and the process described above is adapted and used for internal control.

2018 Idaho 3-Year Plan Priorities

Organization	Priority Area	Description
Idaho Juvenile Justice Commission	Core Protections of the JJDP Act	DSO, Jail Removal, Separation
	DMC	Assessment/Intervention
	System Improvement / Training/Collaboration	Councils, Youth Voice, Reintegration, RJP
	Family Engagement	FGDM, Diversion, Reintegration
Tribal Council	Research and recommendations	Information sharing, census of tribal youth
	Developing Tribal Assets	Youth Voice, UNITY
District 1 Council	Developing Appropriate Resources	Independent living, community/family engagement, transportation
	Collaboration/Communication	Young offenders, patience, education system
District 2 Council	Parenting Skills	Technology, Substance Abuse, Parenting Facilitators
	Mentoring	Mentoring programs, Rural Areas
District 3 Council	Early System Supports and Approaches	Mentoring, RJ in schools
	Collaboration	Forum for information sharing, Council development
District 4 Council	Reintegration	Family engagement and support
	Family Engagement	Design 8-hour curriculum with POST
	Prevention and Collaboration	Educational forums, parenting pilot program
District 5 Council	Early System Supports and Approaches	School Success, Restorative Diversion practices
	System and Service Collaboration	Resource Inventory, Training, Forums
District 6 Council	Pathways to Delinquency	Early childhood programs, Council development
	Positive Youth Outcomes	Evidence-based programs, RJ in schools, Trauma informed practices
District 7 Council	Resource Development	Restorative Practices in schools
	Reintegration	Data, education, stakeholder engagement
	Collaboration	Council outreach and recruitment
Idaho Department of Juvenile Corrections	Evidence-based Practices	Length of stay, successful completion, family involvement
	Competency Development	Coping skills, education, reintegration
	Well-Structured System	Collaboration, training, quality improvement
	Strengthen Department	Leadership, staff/juvenile needs, data

Attachments:

- 1. Appendix A Crime Data Analysis
- 2. Appendix B Budget Form and Budget Description
- 3. Appendix C Waiver Request
- 4. Appendix D SAG Roster
- 5. Appendix E Disclosure of Pending Applications
- 6. Appendix F Research Integrity
- 7. Appendix G Financial Capacity
- 8. Appendix H Disclosure of Lobbying Activities
- 9. Appendix I Statutory Requirements
- 10. Appendix J State Contact Information