

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

ILLINOIS COLLABORATION ON YOUTH, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2016 CH 6172
)	
BRUCE RAUNER, GOVERNOR OF ILLINOIS, in his)	
official capacity, <i>et al.</i> ,)	
)	
Defendants.)	

AFFIDAVIT OF ARLENE HAPPACH

1. My name is Arlene Happach.
2. I am the Chief Operations Officer (COO) of Children's Home + Aid.
3. Children's Home + Aid is a leading child and family service agency in Illinois.

For more than 130 years, we have linked children to a network of opportunity and care. We serve more than 40,000 children and families each year across Illinois.

4. As COO, I am responsible for supervising all of these operations, and I am familiar with the services we provide and the funding sources that support these services.

5. Much of the state funding received by Children's Home + Aid comes from the Illinois Department of Children & Family Services, and - despite the Governor's veto of the General Assembly's appropriations bills - is being paid to us due to a court order.

6. However, we have five separate contracts from the Illinois Department of Human Services (DHS) for which we are not getting funding. During fiscal year 2016, DHS has not paid Children's Home + Aid for the services we perform under those contracts.

7. As a result, three youth services programs that we provide have already been shut down or are in imminent danger of being shut down. We have also had to entirely stop serving 170 youth and 36 families under these three programs.

8. In addition, we have laid off 37 staff members and have been unable to full 10 more positions. If funding is not forthcoming, we will soon lay off another 40 staff.

9. The first of our programs that has been harmed by the missing funding is Comprehensive Community-Based Youth Services (CCBYS), which we have provided in the Englewood community in Chicago and in the Metro East community, outside of St. Louis.

10. CCBYS is committed to ensuring the safety and wellbeing of youth who have left home. The program works to reconcile these youth and their families. If there needs to be a cooling off period, we find the teenagers a safe place to stay. We also connect them with mental health counseling, and serve as liaisons to schools, teachers, probation officers, and police.

11. Based on the fact that DHS has not funded the programs in fiscal year 2016, we were forced to shut down the entire program in Englewood. We served approximately 100 youth a year via that program.

12. When a CCBYS program is shut down, the youth who previously received services tend to end up in more acute situations, as their families begin to lock them out of their homes. We expect many of our formerly-served Englewood youth to end up in the system – in the Department of Children and Family Services, or detained in the juvenile justice system.

13. The Metro EAST CCBYS program has not yet been shut down, but only because we shifted money from other sources. This money will not last much longer: if funding is not forthcoming from DHS, we will have to shut down the Metro East program at the end of June, 2016. The Metro East program is very large – in fiscal year 2015, we served approximately 350 youth in the program.

14. In addition, when we are forced to lay off staff, as we have in both Englewood and Metro East, it will be difficult if not impossible to find replacements at a later date, if funding is restored.

15. Moreover, our staff members take time to develop valuable and meaningful relationships in the community, which allows them to provide quality service. In Englewood, for example, we had staff with deep ties to Englewood.

16. These programs only function because police in the communities served know to call us when they come into contact with runaway teenagers.

17. Because of these realities, once we wind down a CCBYS program, as we have done in Englewood, we are not able to easily reestablish the program once funding is restored.

18. We have no expectation that we will be able to restore the CCBYS program in Englewood even if we eventually receive funding for the services we have already provided.

19. Similarly, if we are forced to shut down our Metro East CCBYS program, as we will have to do within months if funds are not forthcoming, we expect that we will never be able to reconstitute the program.

20. The second program at risk of imminent and irreparable injury is Healthy Families Illinois.

21. Through Healthy Families Illinois, we furnish home visits to new mothers who have been identified as being at risk of DCFS contact in the future.

22. Due to the lack of funding from DHS, this program is currently running at half our typical staffing level, and only serving half our normal number of clients. We have had to drop 16 clients, and have had to lay off a staff member and leave another staff position unfilled.

23. Moreover, we are unable to give to any of our clients or community members the education services that are normally outreach for this program. This informational and educational programming in the community makes potential clients and referral sources aware of the program's existence. Not being able to do this outreach, we receive many fewer clients; the program will dwindle and eventually cease to be relevant.

24. As a result, the longer we go without funding, we not only risk having to shut the program down entirely, but the program becomes less sustainable and will take longer to reestablish if funding is restored, if it is possible to reestablish it at all.

25. The final program at risk of dissolution is Redeploy Illinois, which helps nonviolent juvenile offenders avoid incarceration. We offer counseling, job placement, family therapy, and other services to keep these kids out of the justice system.

26. Redeploy Illinois is noted for being highly effective – studies show that it has reduced youth incarceration by 50% and saved the state of Illinois tens of millions of dollars.

27. Redeploy Illinois is offered on a county-by-county basis by different organizations around the state; we offer the program in four Metro East counties. Only one organization provides these services in each county. Thus, if we are forced to shut down our programs, the juveniles in our served counties will have no such program.

28. Redeploy Illinois works because our highly-trained staff have - over a period of years - developed relationships with judges and prosecutors on the one hand, and community members on the other hand. If we have to shut down Redeploy Illinois, if and when funding is restored, these complex relationships will have to be rebuilt before any organization - Children's Home + Aid, or another group – can provide services again.

29. We have streamlined our provision of these services due to the lack of DHS funding. For instance, we reduced our staffing for the CCBYS program by about a third. We are only able to keep our services at this reduced capacity because of financial assistance from other organizations, including United Way.

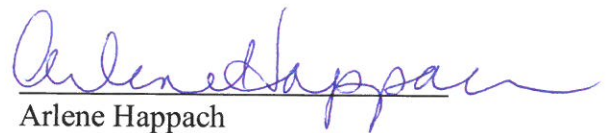
30. In addition, we have deferred maintenance on our buildings, limited travel and consulting help, and stopped funding our staff member's 401(k)s. No matter how much we reduce costs and shut down programs, however, our fixed costs – such as building costs – remain. Moreover, those deferred expenses will come back to cost us more money later.

31. Turnover amongst our staff is now incredibly high, as they search for work in industries that are more stable.

32. DHS has continued to demand performance by Children's Home + Aid under our contracts with them, even though we are receiving no funding from them. For example, DHS regularly requests reports from the organization regarding the outcome of the services performed.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Dated: 5/23/16


Arlene Hapbach