
Performance Audit of the
Social Services Division

September 7, 2021

Final Report



OBJECTIVE

To assess the extent of regard for economy, efficiency and effectiveness within services provided to vulnerable residents by the Social Services Division.

BACKGROUND

The Social Services Division has 88 staff including 10 supervisory staff that provide a range of services to the unemployed, homeless, seniors and disabled. Monthly payments are made to participants of the Ontario Works (OW) program. Other support services provided include temporary shelter for the homeless, assistance for funeral services as well as the assessment and development of employment skills. Their financial impacts are shown below in Tables 1 and 2.

Table 1 – Summary of Revenues and Expenses (\$ Millions)

	Dec 31 2017		Dec 31 2018		Dec 31 2019		Dec 31 2020		June 30 2021	
	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual
Grants/Subsidies	(38.0)	(39.7)	(40.2)	(41.6)	(41.1)	(42.9)	(41.5)	(44.2)	(17.2)	(21.0)
Other	(1.4)	(0.8)	(1.3)	(0.7)	(1.2)	(0.7)	(1.2)	(0.8)	(0.6)	(0.3)
Total Revenues	(39.4)	(40.5)	(41.5)	(42.3)	(42.3)	(43.6)	(42.7)	(45.0)	(17.8)	(21.3)
Grants/Transfers	28.0	29.0	28.9	30.0	30.3	31.6	30.2	31.1	12.0	12.5
Salaries & Benefits	8.2	7.9	8.1	7.8	7.7	7.5	8.1	7.1	4.0	3.2
Purchases & Contract Services	7.8	7.0	8.4	7.8	8.0	7.4	7.9	8.4	3.9	5.2
Internal Recoveries	1.7	1.9	1.6	1.7	1.6	1.8	1.8	1.8	1.0	1.0
Materials & Energy	0.4	0.2	0.4	0.2	0.4	0.2	0.4	0.5	0.2	0.1
Total Expenses	46.1	46.0	47.4	47.5	48.0	48.5	48.4	48.9	21.1	22.0
Net Expenses	6.7	5.5	5.9	5.2	5.7	4.9	5.7	3.9	3.3	0.7

Table 2 – Net Expenses by Program (\$ 000s)

	Dec 31 2017		Dec 31 2018		Dec 31 2019		Dec 31 2020		June 30 2021	
	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual
Ontario Works	5,949	4,800	5,038	4,495	4,896	3,846	4,896	2,987	2,888	2,511
Shelter & Homelessness	537	502	609	493	569	849	585	565	304	(1,967)
Funeral Assistance	253	227	220	257	229	252	249	331	135	199
Homemaker	3	0	3	0	3	0	3	0	2	0
Total Expense	6,742	5,529	5,870	5,245	5,697	4,947	5,733	3,883	3,329	743

METHODOLOGY & SCOPE

This audit included interviews of staff, analysis of policies, procedures, reports and tests of controls for the period January 1, 2017 to June 30, 2021 but excluded Children Services.

EXECUTIVE SUMMARY

Since 2017, Social Services staff have managed overall program budgets effectively while maintaining or increasing levels of service. Notwithstanding, this audit indicated that the full costs of delivery need to be assigned to specific programs to ensure that cost pressures that arise can be identified and managed. Performance targets for each program that reflect better practices in similar municipalities should also be developed so progress against them can be monitored and reported to Council at least annually.

AUDIT STANDARDS

We conducted our audit in accordance with Generally Accepted Government Auditing Standards which require that we adequately plan audits; properly supervise staff; obtain sufficient, appropriate evidence to provide a reasonable basis for audit findings and conclusions; and document audits. For further information regarding this report, please contact Ron Foster at the City of Greater Sudbury at 705-674-4455 extension 4402 or via email at ron.foster@greatersudbury.ca

OBSERVATIONS AND ACTION PLANS

1. Ontario Works (OW) Program and Ontario Disability Support Program

The Social Services Division solely delivers the Ontario Works (OW) program in the City of Greater Sudbury which is supported by the Ministry of Community and Social Services. There are 47 municipalities and District Social Services Administration Boards and 101 First Nation designated delivery agents for the OW program.

Ontario Works combines financial assistance and employment assistance to help persons in temporary financial need move toward sustainable employment and independence. Eligibility for financial assistance and the amount of assistance paid is based on a financial assessment and participation in employment assistance activities. In order to receive financial assistance, recipients are required to enter into a monitored participation agreement that includes an individualized employment plan.

Two of the caseworkers in Social Services have a specialized caseload of OW clients that are medically unable to work. These caseworkers assist these individuals with applications for the Ontario Disability Support Program (ODSP). Clients that meet the eligibility criteria for a disability grant are transferred to the local ODSP office. Payments for ODSP recipients go through the local ODSP which is managed separately by staff of the Ministry of Community and Social Services.

Table 3 below provides the financial impacts of the OW program.

Table 3 – OW Program Revenues and Expenditures (\$ Millions)

	Dec 31 2017		Dec 31 2018		Dec 31 2019		Dec 31 2020		June 30 2021	
	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual
Grants & Subsidies	(34.88)	(36.64)	(36.79)	(38.03)	(37.63)	(39.68)	(37.84)	(39.56)	(14.90)	(14.79)
Other Revenues	(0.99)	(0.60)	(0.89)	(0.47)	(0.87)	(0.43)	(0.80)	(0.52)	(0.21)	(0.19)
Total Revenues	(35.87)	(37.24)	(37.68)	(38.50)	(38.50)	(40.11)	(38.64)	(40.08)	(15.11)	(14.98)
Grants Disbursed	27.65	28.81	28.55	29.58	29.83	31.08	29.76	30.48	11.08	12.19
Salaries & Benefits	8.20	7.85	8.08	7.79	7.78	7.54	7.99	6.97	4.03	3.16
Purchases & Contract Services	3.83	3.33	4.07	3.66	3.74	3.26	3.56	3.23	1.64	0.90
Internal Recoveries	1.74	1.85	1.62	1.76	1.65	1.85	1.84	1.89	1.05	1.02
Other Expenses	0.40	0.20	0.40	0.20	0.39	0.23	0.39	0.50	0.20	0.22
Total Expenses	41.82	42.04	42.72	42.99	43.39	43.96	43.54	43.07	18.00	17.49
Net Expense	5.95	4.80	5.04	4.49	4.89	3.85	4.90	2.99	2.89	2.51

The pandemic resulted in a reduction of caseload for the OW program as many people were eligible for higher amounts from the Canada Emergency Response Benefit program. Social Services staff managed program delivery costs in 2020 and 2021 by not filling several vacant positions. Staff have also initiated steps to permanently eliminate the Employment Counselor classification in preparation for the transition to the Provincial Employment Service Transformation in 2023.

Tables 4 and 5 identify performance indicators and metrics for the City as well as some relevant comparators.

Table 4 – OW Program Performance Indicators

Performance Indicator	2017	2018	2019	2020	June 30 2021
Average Monthly Employment Earnings per Case					
Performance - CGS	\$711.83	\$771.41	\$794.59	\$1,016.91*	\$1,004.83*
Provincial Target for CGS	\$697.47	\$726.42	\$799.31	No target during COVID-19	
Performance - Thunder Bay	\$755.52	\$737.89	\$733.85	\$687.88	\$656.55
Performance – SS Marie	756.18	\$856.07	\$886.31	\$815.76	\$791.82
Percentage Caseload with Employment Earnings					
Performance - CGS	10.85%	10.40%	10.10%	7.94%	6.74%
Provincial Target for CGS	10.70%	10.70%	10.72%	No target during COVID-19	
Performance - Thunder Bay	10.67%	11.21%	10.83%	7.52%	6.45%
Performance – SS Marie	16.78%	15.19%	14.95%	10.24%	9.16%
Percentage of Terminations Exiting to Employment					
Performance - CGS	8.30%	9.86%	17.89%	18.71%	14.06%
Provincial Target for CGS	10.69%	10.69%	10.69%	No target during COVID-19	
Performance - Thunder Bay	9.42%	NA	19.81%	17.69%	16.81%
Performance – SS Marie	16.82%	15.04%	22.56%	19.42%	17.45%
Percent of Caseload Exiting at Month-End to Employment					
Performance - CGS	0.53%	0.63%	1.06%	0.77%	0.38%
Provincial Target for CGS	0.69%	0.69%	0.69%	No target during COVID-19	
Performance - Thunder Bay	0.62%	Not Avail	1.17%	0.96%	0.82%
Performance – SS Marie	0.93%	0.80%	1.32%	0.85%	0.70%

*The increased employment earnings reflects CERB benefits.

Table 5 – Performance Metrics for ODSP and OW Program

	2017	2018	2019	2020	June 30 2021
OW Caseload – CGS	3,401	3,409	3,439	3,347	2,708
% of ODSP Caseload to OW Caseload - CGS	188%	194%	195%	199%	242%
% of ODSP Caseload to OW Caseload - Prov.	147%	155%	161%	188%	201%
Number of Caseworkers in CGS	39	39	42	42	42
Average OW Caseload per Caseworker in CGS	87	87	82	83	65
Caseload/Caseworker – Provincial Guideline	90 to 120				
OW Response Time in Days - CGS	2.3	2.3	2.5	2.4	4.0
OW Response Time in Days - Province	4.8	3.9	3.9	4.0	3.2
Number of Applicants for ODSP	4,144	5,624	4,375	1,847	687
Number of Successful ODSP Applicants in CGS	411	287	226	172	92

Recommendations

- i. Performance targets should be developed to ensure continuous improvements in program delivery. These targets should include better practices from similar municipalities.
- ii. Employment counselors should explore the suitability of OW recipients for seasonal jobs at the City.

Management Response and Action Plan

- i. *Performance targets that are used by the Province are currently being reported quarterly through the CAO performance report. We agree with the recommendation and will review practices from similar municipalities to include in semi-annual reporting to the Community Services Committee.*
- ii. *The Children and Social Services Division will explore further opportunities for seasonal jobs at the City. The Division already has had some success with this in the past with the training of Personal Support Workers for placements and eventual career opportunities with Pioneer Manor.*

2. Homelessness & Shelter Programs

Social Services provides emergency shelter for homeless youth, men, women and families using a number external service providers such as Cedar Place and the Canadian Mental Health Association. To meet the need for space caused by the pandemic and the closure of the Foyer Notre Dame, an 'overlay facility' was opened to provide night shelters. The province has provided enhanced levels of funding for these programs to support physical distancing during the pandemic. Table 6 identifies the financial impact of these programs.

Table 6 - Shelter and Homelessness Revenues and Expenses (\$ Millions)

	Dec 31 2017		Dec 31 2018		Dec 31 2019		Dec 31 2020		June 30 2021	
	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual
Grants & Subsidies	(3.01)	(2.99)	(3.26)	(3.44)	(3.39)	(3.18)	(3.50)	(4.52)	(2.24)	(6.12)
Other	(0.19)	(0.0)	(0.19)	(0.0)	(0.19)	(0)	(0.20)	(0.03)	(0.25)	(0.02)
Total Revenues	(3.20)	(2.99)	(3.45)	(3.44)	(3.58)	(3.18)	(3.70)	(4.55)	(2.49)	(6.14)
Grants Disbursed	0.04	0.03	0.04	0.09	0.13	0.12	0.12	0.12	0.63	0.06
Salaries & Benefits	0	0	0	0	0	0.01	0.09	0.14	0.05	0.02
Purchases & Contract Services	3.69	3.47	4.03	3.88	4.11	3.99	4.17	4.93	2.15	4.11
Internal Recoveries	0.01	(0.01)	(0.01)	(0.04)	(0.09)	(0.09)	(0.09)	(0.07)	(0.04)	(0.02)
Total Expenses	3.74	3.49	4.06	3.93	4.15	4.03	4.29	5.12	2.79	4.17
Net Expenses	0.54	0.50	0.61	0.49	0.57	0.85	0.59	0.57	0.30	(1.97)

Table 7 – MBCan Performance Indicators for Emergency Shelters

Criteria	2017		2018		2019		2020
	CGS	Median*	CGS	Median*	CGS	Median*	CGS
Length of Stay in Days:							
Adults and Children	16.3	12.7	17.3	14.2	13.3	13.3	4.9
Singles	15.4	10.4	14.5	11.0	11.8	11.8	4.4
Families	22.5	24.9	27.8	42.9	28.5	45.4	24.0

Average Number of Beds Available per Night per 100,000 Population	39.6	40.4	39.6	40.2	39.6	39.6	37.8
Direct Cost of Emergency Shelter program per 100,000 of population	\$1,011	\$610	\$983	\$746	\$986	\$761	\$996
Average Nightly Bed Occupancy Rate	60%	96%	64%	95%	64%	93%	73%

**The median is for the 10 municipalities which participated in the MBCan study.*

In 2018, staff engaged consultants to conduct a review of the shelter system in Greater Sudbury to receive recommendations towards establishing a modernized shelter system. In February 2019, the consultants recommended a number of changes to refocus the shelter program to improve occupancy rates in the four shelters that were funded by the City. These recommendations could not be implemented due to the unexpected closure of one of these shelters and the need for opening of the Canadian Mental Health Association’s year-round shelter in April 2019 and the subsequent pandemic.

Recommendations

- i. The costs of internal support services used to deliver the homelessness and shelter programs need to be allocated to this program to properly reflect the total costs of this program.
- ii. Following the pandemic, review the recommendations of the consultants to determine if there continue to be opportunities to improve the effectiveness of the shelter program.
- iii. Develop performance targets for the external providers of homelessness and shelter services and monitor their performance against these targets.

Management Response and Action Plan

- i. *Some of the costs associated with Homelessness services make up part of the Ontario Works service contract with the Province. The overall costs of providing these services such as wages and administrative costs dedicated to homelessness and shelter programs are recorded in MBNCan performance measure HSTL220. We will work with Finance staff to update the reporting of costs for these programs.*
- ii. *A review of the recommendations of the consultants for the shelter system will be completed to look for further opportunities to improve the effectiveness of the shelter program.*
- iii. *Performance targets for external providers will be developed with input from shelter system partners. Reporting has already been updated with the introduction of HIFIS 4.0 and will form part of a new dashboard system once the coordinated access system is up and running.*

3. Funeral Assistance Program

The City provides eligible residents with assistance for funeral costs. For “shareable funerals” the City makes a financial contribution after obtaining an assignment from the estate and any CPP/OW benefit to which the deceased may be entitled. For “non-shareable” funerals, the City pays the full costs.

To address the rising costs for funeral services, some municipalities have capped individual funeral benefits at \$2,500 while others have issued competitive purchasing. To manage the rising costs for funeral services, staff recommended that the City of Greater Sudbury approve a competitive process for funeral services as outlined in a report entitled "Social Services - Discretionary Benefits Update". While this motion was defeated

by Council on August 12, 2020, Council did not approve a maximum fee for funeral assistance which has been as much as \$6,148 per individual in the past several years.

Table 8 identifies the City's cost of funeral assistance for adults. Table 9 summarizes the average cost per funeral. Table 10 illustrates the growing financial impact of the funeral assistance program.

Table 8 – Funeral Assistance for Adults

Service Type		2017	2018	2019	2020	June 30 2021
Cremation with Service	Low \$	2,708	1,529	2,086	2,642	1,409
	High \$	6,099	6,148	4,660	5,585	4,427
Direct Cremation	Low \$	2,084	2,085	2,086	2,053	2,766
	High \$	5,535	4,659	4,660	4,722	5,492
Burial with Service	Low \$	4,115	4,159	3,990	4,013	4,206
	High \$	4,932	5,034	4,533	4,801	4,627
Direct Burial	Low \$	-	2,420	2,478	2,147	1,953
	High\$	5,338	3,805	4,056	4,056	-

Table 9 – Average Cost of Funerals

	2017	2018	2019	2020	June 30 2021
Cost of Funerals	\$226,537	\$257,132	\$252,055	\$331,574	\$198,588
Number of Funerals	107	120	136	182	86
Avg Cost per Funeral	\$2,117	\$2,143	\$1,853	\$1,822	\$2,309

Table 10 - Funeral Assistance Revenues & Expenses (\$ 000s)

	Dec 31 2017		Dec 31 2018		Dec 31 2019		Dec 31 2020		June 30 2021	
	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual
Total Revenues	(203)	(160)	(203)	(182)	(203)	(220)	(223)	(314)	(111)	(132)
Purchases and Contract Services	89	70.0	107	92	107	64	118	133	54	76
Transfer Payments	367	291	316	322	325	380	354	497	192	244
Int'l Recoveries	0	26	0	25	0	28	0	16	0	11
Total Expenses	456	387	423	439	432	472	472	646	246	331
Net Expense	253	227	220	257	229	252	249	332	135	199

Recommendations:

- i. Staff should recommend a maximum for funeral assistance benefits per individual within the discretionary rate chart that is provided to the Community Services Committee and Council for approval.
- ii. Report to Council at least annually on the number of funerals and cost of funeral assistance.

Management Response and Action Plan

Staff will bring the historical rate chart forward for Council approval. We will report annually to the Community Services Committee on funeral costs along with the entire discretionary services envelope of funding from the Province.

4. Homemaker Program

Homemaker initiatives are provided to seniors at the Ukrainian Seniors Centre and are paid for with grants from the Ministry of Health and Long Term Care. This is a flow-through program that is managed by the City for no cost. Table 11 summarizes the financial impact of this program.

Table 11 - Homemaker Program Revenues and Expenses (\$ 000s)

	Dec 31 2017		Dec 31 2018		Dec 31 2019		Dec 31 2020		June 30 2021	
	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual
Grants	(130)	(119)	(130)	(119)	(130)	(119)	(130)	(119)	(49)	(80)
Other Revenues	(30)	(30)	(30)	(30)	(30)	(30)	(30)	(30)	(14)	(15)
Total Revenues	(160)	(149)	(160)	(149)	(160)	(149)	160	(149)	(63)	(95)
Purch/Contracts	163	149	163	149	163	149	163	149	61	95
Net Expenses	3	0	3	0	3	0	3	0	2	0

Recommendation:

Report to Council at least annually on the performance of this program.

Management Response and Action Plan

The City acts as a flow through for this particular grant from the Ministry of Health and Long Term Care and we will include information on the program as part of the proposed semi-annual reporting to the Community Services Committee.

Table 12– Summary of Significant Risks

Risk	Total No. of Risks	Risks (Before Controls)			Residual Risks (After Controls)		
		High (15 to 25)	Med (9 to 14.99)	Low (1 to 8.99)	High (15 to 25)	Med (9 to 14.99)	Low (1 to 8.99)
Reputation (R)	1	1	0	0	0	0	1
Operational (O)	5	5	0	0	0	2	3
Financial (F)	3	3	0	0	0	2	1
Legal (L)	1	1	0	0	0	0	1
TOTAL	10	10	0	0	0	4	6

Table 13 – Significant Risks

Risk	Description of Risk	Inherent Risk	Residual Risk*
F1/O1	Services may not be provided with due regard for value for money.	20	12
F2	Program revenues may be insufficient to sustain the services.	22	12
O5	Service delivery may not be adequately monitored or controlled.	20	12
F3/O2	Purchases may not be in accordance with the City’s Purchasing By-law.	18	8
O3	Access controls over confidential information may be inadequate.	15	8
O4/R1	Program delivery issues may arise which could damage the City’s reputation.	15	8
L1	Legal and regulatory obligations may not be managed effectively.	15	8

* Eliminating residual risks (risks after controls) is not cost-effective.

Impact	Services	Technology	People	Strategic	Legal/Reputational	Financial
Very Minor (1)	<ul style="list-style-type: none"> • Less than 90% of service objectives achieved. 	<ul style="list-style-type: none"> • Minor performance issues or lack of availability of secondary systems or data loss or corruption. 	<ul style="list-style-type: none"> • Minor reportable employee injury. • Increase in number of union grievances. 	<ul style="list-style-type: none"> • Minor instances of actions that are at odds with strategic priorities. 	<ul style="list-style-type: none"> • Small amount of negative media coverage or complaints to City. • Non-lasting damage or no reputational damage • Theft or Fraud under \$1,000. 	<ul style="list-style-type: none"> • Uninsured loss, cost overruns or fines < \$10K • Insured loss < \$100K • Loss of replaceable asset.
Minor (2)	<ul style="list-style-type: none"> • Less than 75% of service objectives achieved. • Unable to perform non-essential service. 	<ul style="list-style-type: none"> • Performance or availability issues with secondary systems or data loss or corruption • Disclosure of non-confidential but embarrassing information. 	<ul style="list-style-type: none"> • Reportable employee injury. • Loss of key staff but able to recruit competent replacements • Significant increase (>10%) in number of union grievances. 	<ul style="list-style-type: none"> • Instances of actions at odds with strategic priorities. 	<ul style="list-style-type: none"> • Complaints elevated to the Director level. • Short-term repairable damage to City's reputation • Public outcry for discipline of employee. • Moderate amount of negative media coverage • Theft or Fraud of \$1,000 to \$10,000. 	<ul style="list-style-type: none"> • Uninsured loss, cost overruns or fines of \$10K to \$100K • Insured loss < \$100K - \$1M • Inefficient processes • City's actions result in reduced economic development.
Moderate (3)	<ul style="list-style-type: none"> • Less than 60% of service objectives achieved. • Unable to perform essential service but alternatives exist. 	<ul style="list-style-type: none"> • Disruptions or performance issues with significant systems or data loss or corruption • Recoverable data loss from an important system. • Minor disclosure of confidential information. 	<ul style="list-style-type: none"> • Multiple employee injuries or long-term disability from one incident. • Inability to retain or attract competent staff. • Increase in stress leave, sick leave or WCB claims. • Work-to-rule union disagreement or short-term strike. 	<ul style="list-style-type: none"> • Numerous actions are at odds with strategic priorities. 	<ul style="list-style-type: none"> • Public/media outcry for removal of management • Long-term damage to City's reputation • Citizen satisfaction survey indicates unacceptable performance. • Complaints elevated to Council level. • Results inconsistent with commitments made to citizens • Theft or Fraud under \$100,000. 	<ul style="list-style-type: none"> • Uninsured loss, cost overruns or fines of >\$100K to \$1M • Insured loss >\$1M to \$10M • Having to delay payments to contractors/suppliers. • >20% current demands cannot be services with existing and approved infrastructure. • City's actions results in lost revenue for significant number of City businesses.

Impact	Services	Technology	People	Strategic	Legal/Reputational	Financial
Major (4)	<ul style="list-style-type: none"> • Less than 45% of service objectives achieved. • Unable to perform an essential service where no alternative exists. 	<ul style="list-style-type: none"> • Unrecoverable loss or corruption of data from an important system • Unavailability or major performance issues with significant systems • Disclosure of sensitive or confidential information 	<ul style="list-style-type: none"> • Serious injury of one or more employees • Legal judgment against the City in workplace matter. • Turnover of key employees • Sustained strike of services. 	<ul style="list-style-type: none"> • Numerous actions are significantly at odds with the strategic priorities. 	<ul style="list-style-type: none"> • Public/media outcry for change in CAO or Council • Public or senior officials charged or convicted • Legal judgment against the City in a workplace matter • Integrity breach resulting in decreased trust in City Council or Administration. • Theft or Fraud >\$100,000 	<ul style="list-style-type: none"> • Uninsured loss, cost overruns or fines of >\$1M - \$10M • Insured loss of >\$10M - \$100M • Unable to pay employees and contractors on a time. • Failure to maintain financial capacity to support current demands. • City's actions impair local economic conditions.
Extreme (5)	<ul style="list-style-type: none"> • Less than 30% of service objectives achieved. • Unable to perform several essential services where no alternatives exist. 	<ul style="list-style-type: none"> • Unrecoverable loss or corruption of data from a critical system • Unavailability of critical systems • Major disclosure of sensitive or confidential information 	<ul style="list-style-type: none"> • Death of an employee • Major legal judgment against the City in workplace matter. • Significant turnover of key employees with ELT • Sustained strike of key services 	<ul style="list-style-type: none"> • Many actions are significantly at odds with the strategic priorities. 	<ul style="list-style-type: none"> • Public/media outcry for change in CAO or Council • Senior officials criminally charged or convicted • Severe legal judgment against the City in a workplace matter • Major integrity breach resulting in complete loss of trust in City Council or Administration. • Theft/Fraud >\$1,000,000 	<ul style="list-style-type: none"> • Uninsured loss, cost overruns or fines >\$10M • Insured loss > \$100M • File for bankruptcy • Failure to maintain financial capacity to support current demands. • City's actions significantly impair local economic conditions.

Likelihood	Unlikely (1)	Possible (2)	Probable (3)	Likely (4)	Very Likely (5)
	Less than 20%	>20% but < 40%	>40% but < 60%	>60% but < 80%	80% or more
	Less frequent than every 10 years	May occur in the next 2 years	Will occur this year or next year at least once	May occur regularly this year	Will occur within months may reoccur often