

Wisconsin's Targeted Safety Support Funds

Program and Fiscal Guide for Tribes: January 2020-December 2020

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Funding Purpose and Goals:

Purpose:

Wisconsin's Targeted Safety Support Funding (TSSF) reduces trauma to children by keeping children safe with their families, providing support and resources to build on family strengths, preventing future maltreatment and supporting reunification planning to prevent re-entry.

Primary Goal:

The primary goal of the Targeted Safety Support Funding is to keep families intact by:

- Increasing parental protective capacities
- Decreasing out-of-home placements
- Helping families develop formal and informal supports
- Reducing maltreatment to children
- Supporting reunification planning to prevent re-entry

General Requirements:

- Data and information must be tracked to support eligibility requirements, demonstrate fidelity to practice requirements, and support Targeted Safety Support payment to the agency.
- Cost reporting must be submitted monthly. See [Cost Reporting](#) section for more information.

Funding Description:

The use of Targeted Safety Support Funds are appropriate when the tribe determines that a child is unsafe but Danger Threats can be controlled in the home through planning services. Families may be served with Targeted Safety Support Funds if these conditions exist at any time in the case process.

Targeted Safety Support Funds are guided and administered in accordance with:

- Wisconsin Children's Code (Chapter 48) or similar tribal law
- Wisconsin's [Child Protective Services Safety Intervention Standards](#) or similar tribal policies
- Wisconsin's [Child Protective Services Access and Initial Assessment Standards](#) or similar tribal policies
- Wisconsin's [Ongoing Services Standards](#) or similar tribal policies
- [Federal Temporary Assistance for Needy Families \(TANF\) laws and regulations](#)
- DCF's Allowable Cost Policy Manual

Targeted Safety Support Funds (TSSF) are available to counties and tribes to serve families when children are assessed unsafe and at-risk of removal from their home or are being returned home with the need to control safety through planning and services. Agencies provide intensive services to keep children safe while keeping the family intact. Targeted Safety Support Funds have been made available to agencies to better ensure access to vital funding, particularly during the critical phases of the child protective services casework process. During these key times, such as in the course of conducting an assessment or shortly before and after a child's reunification with his

or her family, Targeted Safety Support Funds are available for agencies to be reimbursed the cost of select services that may be used to control safety through planning and services.

While agencies can determine the appropriate enrollment period in Targeted Safety Support Funds based on the family's identified needs, these needs, and the corresponding agency response to these immediate needs, must be part of the family being served to control safety through planning and services. While total enrollment length is individualized at the agency's discretion for each child enrolled, due to TANF requirements and restrictions, reimbursement for certain service provisions will be constricted to a four-month time limit. These time-restricted services are concrete services generally used for short-term stabilization. If the agency determines that the services are still needed to mitigate a safety threat past the four-month reimbursable time limit, the agency is responsible for those service costs. Further information regarding this is found in the [Allowable Services](#) section of this manual.

Eligibility and Enrollment Requirements:

Eligibility is related to case characteristics. A child is eligible to be enrolled into TSSF if the requirements outlined below are met.

To qualify for TSSF the following is required:

- The case is a Child Protective Services case or the case is open with the tribe's Indian Child Welfare department.
- The child must be at risk of removal from the home.
- The Tribe must track and report on outcomes for cases involved in TSSF. Outcomes will include if there were new referrals on the case and if the children went into OHC following the TSSF Program closure. Tracking can be submitted by email or fax.

If a Tribe determines that it would be appropriate to enroll a child/ren in TSSF, the Tribe is responsible for internally tracking start and end dates.

A child reunified on a trial-reunification is eligible for TSSF if there is an active, approved Protective Plan or Safety Plan in place (Present or Impending Danger Threats are identified) and it is documented in eWiSACWIS.

Enrollment Process:

- The Tribe identifies children who would benefit from TSSF; child is unsafe but safety can be controlled in their home through planning and services.
- If a Tribe has a question on eligibility, please reach out to the Program Coordinator prior to enrolling the child.

Enrollment Closure:

- If a Tribe determines a child is no longer in need of TSSF or is no longer eligible, the agency is responsible for tracking the closing of the program enrollment on the outcome and cost reporting sheet (see Cost Reporting/Outcome Tracking for below). Children are not automatically disenrolled after a set time period.

- The following reasons may result in a closure:
 - The child is determined to be safe in-home with no continued services necessary to ensure safety.
 - Safety can no longer be assured through in-home planning and an out of home placement is necessary.
 - The tribe is closing the family's child welfare case.
 - Funding resources for service provision are no longer determined to be needed to support safety.

Allocation Award Structure:

Participating agencies are awarded Targeted Safety Support Funds by the Department of Children and Families through an application process. Funds are made available to counties in two separate allocations (January-April/May-December) to serve all enrolled children.

To accommodate variance in timing between the TANF funding cycle and the state fiscal year, the award is broken into two funding allocations, totaling the full award amount. Each agency will be awarded a January-April allocation, and a May-December allocation within their contract. Funds are available to cover associated costs for enrolled children in that given program period (January-April/May-December). **Funds not spent from the January-April allocation will not be able to be utilized after April 30th.** Due to this allocation split, it will be important for agencies to be mindful of their allocation balance to ensure that funds are not left unutilized. Allocation balances can be checked on the **Contract Balance Report**: <https://dcfsparc.wisconsin.gov/reports/contract-balance> If you have any questions regarding viewing your agency's contract allocation balances, please contact DCF Finance: DCFFinanceGrants@wisconsin.gov

Allowable Services Overview:

Program expenditures must be reasonable, necessary, and provide a direct benefit to the children and families enrolled in the program. Unallowable costs include those not directly related to program needs, as well as certain costs that are explicitly unallowable per Chapter IV of the Department's [Allowable Cost Policy Manual](#). Please note that many of the explicitly unallowable costs in DCF's Allowable Cost Manual refer to *agency* costs, and do not necessarily apply to *client* costs. Cost categories such as "goods and services for personal use" and "personal housing and living expenses" are allowable if they can be justified as helping the family manage child(ren) safety. Individual purchases that are not allowed in the Allowable Cost Policy Manual and/or are in excess of \$2,000.00 require the Department's approval. Please send requests regarding these kinds of purchases to: DCFTSSF@wisconsin.gov.

Considerations for approving expenditures:

- Is this expenditure meaningfully related to maintaining safety of the child and/or children in the home?
- Is there a plan to make the service or assistance sustainable for the family beyond the unsafe and at-risk of removal from home period?

- Do the supervisor and financial manager approve the use of state funding in this way?

Families participating in the TSSF Program may also be participating in Children’s Long-Term Support (CLTS). This is allowable so long as expenditures reported on the quarterly Cost Reporting form reflect **child welfare** case management and paid service costs that directly support meeting the needs and achieving the goals of the family as articulated in the case plan. In addition, Cost Reporting must reflect the **net cost** incurred by the agency for the provision of these services.

Allowable Services Background Information:

In addition to the above guidelines, TSSF also contains provisions for allowable costs as dictated by TANF funding requirements. Only services from these allowable service categories will be paid for with Targeted Safety Support Funding. Per TANF requirements, reimbursement for medical services is unallowable. Any costs that are incurred by local agencies for this purpose, i.e. to address needs identified for an enrolled child in the family’s Safety or Protective Plan, can be reported by the agency as Match. For the purpose of this service area, the following definitions apply:

- **Medical Services**, which cannot be reimbursed under this program, are services provided by a medical professional, such as a doctor, nurse, psychiatrist or other medical provider.
- **Non-Medical Services**, which can be reimbursed under this program if they fall within the allowable services categories below, are services that are provided by anyone outside of the medical profession, such as a counselor, social worker, psychologist, or personal care worker (if the service is Medicaid billable this should continue to be billed first. Services provided by a medical professional, such as doctor or a nurse or other medical provider are unallowable)

In addition to the above provision, there is a subset of allowable services in TSSF that will be time-limited for purposes of TSSF reimbursement from DCF. These service areas include the following:

- Food and Clothing Services
- Housing Assistance
- Transportation
- Household Support
- Recreational Activities
- Daycare
- Respite

Time-Limited Resources listed above may be provided, but reimbursement under TSSF is limited to four months. Any costs that are incurred by local agencies for this purpose, i.e. to address needs identified for an enrolled child in the family’s Safety or Protective Plan, that are beyond four months in duration, can be reported by the agency as Match.

In practice, if an agency creates a Safety Plan and a child is enrolled in the TSSF, that family may receive services across multiple cost reporting categories. For example, a family could be receiving **housing assistance** (Time-Limited Resources), **respite** (Time-Limited Resources), and **case management services** (Unlimited Resources) under this Safety Plan. There is no time limit on the period that this child can be

enrolled in TSSF if they meet all other enrollment requirements. This child can be enrolled for over four months, but the agency may only submit for reimbursement of costs for the Time-Limited Resources for a four-month window during their enrollment period. If in the above example, respite and housing assistance continues to be a necessary service beyond four-months to ensure safety on this plan, the agency would be responsible for the cost of that service but could report those expenditures as match. Please see the [Cost Report Example](#), for an explanation of how to report this service mix.

As with other state and federal funding sources and allocations, counties are be responsible for tracking and documenting this information internally and for purposes of TSSF, will continue to track enrollments and report costs in SPARC. No exceptions may be granted to extend reimbursement for the time-limited services beyond four months. DCF recognizes the complexity that accompanies the above funding requirements and will be continuing its evaluation of the resulting business and programmatic implications through ongoing feedback from agencies.

Allowable Services: TSSF Service Categories

The following service categories can be funded by TSSF when included on a Protective Plan or Safety Plan. Services can be provided by either formal or informal supports. Both formal and informal supports can be paid for using this funding. As part of the application process, agencies indicate how much of their award they intended to spend in each category. This is used as a tool to help agencies identify areas of spending and as a means for agencies, as well as DCF, to evaluate spending changes/needs.

The Two Cost Reporting Categories are:

- 1. Time-Limited Resources (Four Months)**
- 2. Unlimited Resources (Can Exceed Four Month Timeframe)**

Examples of services that may be included in a plan that are eligible for reimbursement, including those that are subject to a four-month limitation, can be found below. Services that are not included below will need to be approved by the Program Coordinator for reimbursement, as allowable under state and federal law. The services listed below tie directly back to Service/Activity as identified on the family's Safety or Protective Plan.

- 1. Time-Limited Resources (Four Months)**
 - a. Food/Clothing Services: Services to connect a family with food and/or clothing that are necessary to control for safety.
 - b. Housing Assistance: Emergency assistance to help families access safe housing when it is necessary to control for safety. This includes providing rent or a stay in a hotel.
 - c. Transportation: This may include bus passes, gas vouchers, taxis, professional drivers, and providing rides to family members to access services identified on a protective plan or safety plan.
 - d. Household Support: Assistance from the agency in obtaining services or household items needed to maintain safety. This includes but is not limited to utility assistance and household items including car seats, safety gates, door alarms, and safety monitors, etc. as well as repairs to the home so that it is safe.

- e. Recreational Activities: Any activities a child or parent participates in during times of separation to control for safety. This could include having a mentor take a child or parent out of the home for periods of time.
- f. Daycare: The paid care of a child by a person other than the child's legal guardians or custodians to create separation between the children and their caregivers and control for safety. This includes both payment to established centers and informal supports.
- g. Respite: Respite services include services such as temporary care for children to relieve a primary caregiver who may be experiencing severe distress or who may be in a state of crisis. This may be used in circumstances where the accumulation of caregiving responsibilities results in threats to safety.

2. Unlimited Resources (These resources do not have a four-month TANF time-limit. They can be submitted for reimbursement if used on a Safety or Protective Plan throughout period of enrollment and meet all other allowable cost requirements.)

- a. Social Supports: Supportive resources by family, friends, neighbors, coworkers, or others used to control for safety threats. Social connection and emotional support are an appropriate safety response for a parent whose isolation and unmet emotional needs result in threats to child safety. This is only an appropriate safety response if the planned connection and support has an immediate impact on the parent's behavior toward the child.
- b. Supervision/Observation: Supervision and observation may involve informal or formal providers whose primary focus is to oversee interactions between parents/caregivers and children and intervene if safety threats arise. Informal providers, such as friends, neighbors or relatives, may be especially effective for providing supervision during critical times of day when safety threats may become active and result in harm to the child. For example, this could include observing/supervising a parent at bed time if this has been identified as a critical time for the family. Formal providers may include, but are not limited to: in-home safety teams, agency paraprofessionals, other contracted workers, and CPS workers. Payment for supervision and observation can be made to both formal and informal supports.
- c. Basic Home Management: Controlling for safety by assisting with budgeting, household schedules, and daily tasks or any other activities needed to maintain a household.
- d. Unique Child Condition Service: Services used to address safety issues specific to one child in the family that may be related to a special need or circumstance.
- e. Basic Parenting Assistance: Parenting involves compensating for the parent's inability to perform basic parenting and other life skills that affect child safety. It could include basic functions such as like feeding, bathing, and supervision or more specialized modeling to learn to care for a child's specific non-medical physical wellbeing and psycho-social needs. The provider is responsible for seeing that these functions are performed.
- f. In-Home Health Support: Providers that assist the family in non-medical services that support the health of the family members to control for safety issues. This includes modeling for the family how to provide care for the child. If services are eligible for Medicaid funding, Medicaid should be billed first.
- g. Crisis Services (Non-Medical): Crisis stabilization or diversion services specifically focused on safety intervention. This could be related to AODA, emergency mental

health care or other family stressors. If services are eligible for Medicaid funding, Medicaid should be billed first.

Control is the primary function in all contacts with the family that are contained in the Protective or Safety Plan. Assuring child safety is always the priority for these services. Change services may be included only if they do not detract from this primary goal. If it is determined that control and child safety can be fully maintained during a visit the following change services may also be provided. Change services are focused on transition to safety and independence or a case plan in Ongoing Services.

The following services can be funded by TSSF when offered in relation to safety management or the provision of safety related services. The below categories may not be on a Protective or Safety Plan but will be reflected in monthly cost reporting. Please note, these are considered Unlimited Resources and should be submitted on that cost-reporting line.

- h. Mental Health and AODA Services (Non-Medical): Counseling or other non-medical therapeutic services that focus on increasing protective parental capacities to eliminate the identified safety threats in the home. This service may only be provided if safety can be fully maintained and may never compromise child safety. TSSF should be used to fund these services if using TSSF funds would allow for the service to begin sooner or would not otherwise be funded through MA or insurance.
- i. Parenting Education: Parenting education is provided to teach parents appropriate parenting techniques and is used to enhance parental protective capacities. This service may only be provided if safety can be fully maintained and may never compromise child safety. If safety is a concern during parenting education the provider must be willing to provide the needed service to the child. For example, the provider must step in and provide food to the child if the parent is unable or unwilling to do so.
- j. Case Management Services: Working with families, youth, children, providers and others for provision of tasks and activities to support, develop, implement, monitor, and manage Protective and Safety Plans.

Cost Reporting

The Tribe will report actual program costs in SPARC on a monthly basis. Costs for enrolled children to ensure safety in-home can be submitted for reimbursement under TSSF within the confines of the allowable program services described above. Spending will be captured across the two cost-reporting categories and one match category.

DCF will reimburse actual program costs monthly on SPARC, up to the allocated award amount. Total reimbursement cannot exceed the total allocation amount nor exceed the total reported actual program costs. The TSSF award can be used flexibly by the agency on all enrolled children, within the confines of the allocation, allowable cost parameters, and applicable Time-Limited Resources. Under previous In-Home Safety Services models, agencies were awarded a number of slots and a related dollar amount based on \$36/day or \$1,100/month for up to four months per child. This has been eliminated from the

TSSF model with agencies able to receive reimbursement on allowable costs up to their allocation award limit.

Sparc Lines:

Time-Limited Resources: 3632A

Unlimited Resources: 3632B

Match: 9632

DCF Reimburses on: 3632

The Department recognizes that each county and tribe will have its own methodology for calculating an hourly rate for child welfare case management staff, and integrating the extra effort required to support TSSF cases into its staffing plan. For auditing purposes, the Department requires participating TSSF counties and tribes to annually describe that methodology ([Appendix C](#)). Agencies must keep this methodology on file.

Local Agency Match:

In accordance with Wis. Stat. 49.175(1)(t), TSSF require a 9.89% agency match for the receipt of funding. Agencies should report TSSF match costs in SPARC on line 9632. Match costs could include TSSF-eligible services not already reported on lines 3632A/3632B, including costs for time-limited resources that exceed the 4-month window, and costs for medical services which are not reimbursable under this program. The agency will have to maintain an audit trail to support the match costs reported.

At the end of the contract term, if the required match amount has not been met, a takeback will occur.

Reported match should exclude costs reimbursed by Target Safety Support Funds, and costs reported on CFA lines 3561, 3681, and 9681.

Cost Reporting Example

The TSSF example given above indicates a family is receiving **housing assistance** (Time-Limited Resources), **respite** (Time-Limited Resources), and **case management services** (Unrestricted Resources), and **psychiatric consultation** (Non-reimbursable) per their Safety Plan.

If housing assistance is needed for three months, while case management, respite, and psychiatric consultation are needed for six months, here is how those costs would be reported:

Service	Type	SPARC line	SPARC line
		Months 1-4	Months 5-6
Housing (3 months)	Time limited (TL)	3632A (TL)	n/a

Case Management (6 months)	Unlimited (UL)	3632B (UL)	3632B (UL)
Respite (6 months)	Time limited (TL)	3632A(TL)	9632 (Match)
Psychiatric Consult (6 months)	Non-reimbursable	9632 (Match)	9632 (Match)

Sub- Contracting Requirements:

TSSF can be used to purchase services from contracted providers. In the case of contracted providers, the county is responsible for ensuring that there is no delegation of responsibility of safety assessment, documentation, planning, or case closure activities to the contracted provider. Agencies will be asked as part of their regular reporting to DCF to indicate if the agency is contracting out any service provision for TSSF and how the agency monitors the services provided by contractors.

Please note, contracted providers are required to provide to the agency cost reporting information that aligns with service cost centers detailed in [Appendix C](#).

Contract Monitoring:

During the application process, each agency will identify measurable outcomes to track for TSSF. Agencies will submit an estimate of how the TSSF award would be spent across the two-cost reporting categories. Agencies will be required to report on this information, as well as population served at specific intervals. Agencies will submit an initial report following the initial six months with the TSSF using the Target Safety Support Funds Report. An annual report is needed at the end of the calendar year. A copy of the report is attached to this document as [Appendix D](#).

The Program Coordinator will review SPARC data, Agency Eligibility data and other program information periodically. Technical Assistance calls will be scheduled as needed to better understand population served and program needs.

Appendices:

[A. Targeted Safety Support Funds FAQ](#)

[B. Contact Information](#)

[C. TSSF Case Management Staffing Plan](#)

[D. TSSF Report \(6 and 12 Months\)](#)

Appendix A: Targeted Safety Support Funds FAQ

Q1: Are there time limits to how long a family or child can be served with Targeted Support Funds?

Previously, there were stipulations regarding how long a family could receive services with these funds. There is no longer a four-month enrollment window and a child may be enrolled for three months or twelve months at the agency's discretion if all enrollment/eligibility requirements are met. However, in order to remain within TANF compliance, certain services within the enrollment period are limited for reimbursement to a four-month window. Agencies are responsible for determining the best use of their funds and enrolling/disenrolling children. Agencies will be reporting to DCF at periodic intervals regarding their costs, children served and average length of time in the program, amongst others. DCF will be monitoring and evaluating this periodically and will provide technical assistance or follow up calls with counties who may need additional support in maximizing this funding stream.

Q2: Is Match still required?

Yes, in accordance with [Wis. Stat. § 49.175\(1\)\(t\)](#), Targeted Safety Support Funds requires a 9.89% agency match.

Q3: What happens if a county or tribe budgeted less for one category than was needed?

As part of the application process, agencies estimated how much of their award would be spent in each of the two spending categories. Agencies are able to adjust their estimated spending without additional approval from the Program Coordinator but must be able to speak to what they learned about the use of their funds on the Targeted Safety Support Funds Report.

Q4: Do children who have been reunified qualify for Targeted Safety Support Funds?

Children who have been in out of home care but have returned home qualify for Targeted Support Funds if they meet the eligibility criteria. To qualify for Targeted Safety Support Funds, the tribe must determine that a child is unsafe but Danger Threats can be controlled in the home through planning services. Families may be served with Targeted Safety Support Funds if these conditions exist at any time in the case process.

Q5. Can Targeted Safety Support Funds be used for cases on the Alternative Response Pathway?

Yes, this would be appropriate if a child meets the eligibility requirements. The case must have confirmed Danger Threats and the children must be assessed as unsafe.

Q7. What reporting requirements exist for counties?

Agencies will submit an initial report following the initial six months with the Targeted Safety Support Funds using the Target Safety Support Funds Report. An annual report is needed at the end of the calendar year.

Q8. What if a family continues to need a service, but it is not allowable to submit for reimbursement as it has been over the four-month timeframe?

Agencies are responsible for ensuring safety management for a family, regardless of the timeframe. If a family continues to need a service as part of a Safety or Protective Plan to mitigate a danger threat, the agency would be responsible for that service but could submit this expense as their agency 'match'.

Appendix B: Contact Information

For questions related to TSSF, please contact Coordinator:

DCFTSSF@wisconsin.gov

608-422-6960

Appendix C: TSSF Case Management Staffing Cost Plan

County/Tribe: _____

Fiscal Year: 2020

The Department recognizes that each county and tribe will have its own methodology for calculating an hourly rate for child welfare case management staff, and integrating the extra effort required to support TSSF cases into its staffing plan. For auditing purposes, the Department requires participating TSSF counties and tribes to annually describe that methodology by responding to the following questions. Please retain documentation to support these calculations and make available as needed.

1. Please provide the hourly rate (or range of rates) for child welfare staff that will be used as the basis for reporting case management staffing costs on line 604 (Case Management Services)

\$____/hour; (or) Between \$____ and \$____/hour.

2. Briefly describe the methodology used to develop this case management rate. Is it based on the CLTS methodology using child welfare staff as the basis for rate calculation, or some other case management rate methodology?

3. Are Agency Management, Support, and Overhead (AMSO) costs included in the case management hourly rate? _____

- If so, what percentage of the hourly rate is AMSO? _____
- If not, will you be reporting AMSO on the separate AMSO line? _____

If you are allocating AMSO based on FTE, what is the estimated AMSO cost per FTE? _____

How frequently are AMSO costs determined/re-calculated? _____

4. Will your county or tribe be reporting retroactive adjustments to the rate(s) listed in question #1 or the AMSO costs in question 3? If so, when and on what basis?

**Please retain a copy of this plan for your county's financial records.*

Appendix D: TSSF Report Template EXAMPLE

Please note a fillable template will be distributed for completion. This template is meant to give guidance as to the type of information that will be requested by DCF

CONTACT INFORMATION	
County	
Address	
County Director	
Email	
Telephone Number	
TSSF Coordinator	
Email	
Telephone Number	
TARGETED SAFETY SUPPORT FUNDS	
2020 Award	\$

Cost Reporting

Using your information entered in SPARC for cost-reporting, fill out the following information showing cost reporting by category.

Cost Reporting:	
Time-Limited Resources	\$
Unlimited Resources	\$
Total Amount Submitted Via SPARC (with supported costs)	\$

1. If you experienced any underspending of the Targeted Safety Support Funds, please explain in detail the reason for the underspending. For 6-month Reporting, please consider current rate of spending within the allocation time period and anticipated use of funds. *Please note this information may be used in future allocation of award.*

2. What percentage of allocated funds were used on time-limited services within the required four-month time allotment? Please explain how your agency monitored the time-limited nature of these services to ensure compliance with the contracting requirements for this award. Were there any challenges or barriers that arose? If yes, how were they mitigated?

3. Using the Outcomes/Enrollments Report found in eWiSACWIS, complete the following data. The report should be run for the entire reporting period.

Total # of children served	# of children ages 0-5 served	# of children 6-12 served	# of children 13+ served	Total # of families served	Average Length of Service	# of Allegations on TSSF cases	# of Substantiations on TSSF cases

5. Please list the 3 key outcomes identified on the initial application that were measured in regards to Targeted Safety Support.

Outcomes identified must be SMART (specific, measurable, achievable, relevant, and time-bound) and able to aid in determine effectiveness of fund use.

Key Outcome 1:

Key Outcome 2:

Key Outcome 3:

6. Report on any findings or progress related to the above listed outcomes. Explain how you tracked the above outcomes. Please consider both quantitative and qualitative sources in your response, as well as county factors or strategies that may be influencing the key outcomes.

Key Outcome 1:

Key Outcome 2:

Key Outcome 3:

7. Are there any changes that are being made to use of Targeted Safety Support Funds based on this information?

8. Does your agency use Targeted Safety Support Funds to purchase contracted services? If so, who does your agency contract with and what services are provided?

9. How does your agency monitor the services provided by the contractor?