

The Impact of Courts on Society: Residency Requirements for Welfare Benefits As a Case Study

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I. INTRODUCTION

Legal scholars have evidenced a widespread interest in examining the impact of courts upon the social system.¹ Although there is considerable difficulty in isolating and measuring a law's impact,² many of the efforts to date have been encouraging.³ A key finding in this impact research is that court decisions have varying effects. This suggests that a mechanistic view of legal impact is inaccurate. Change in society is not easily brought about by change in the law.⁴

The elimination of durational residency requirements⁵ for the receipt of welfare assistance in Illinois affords an excellent opportunity to examine the above thesis. The importance of wel-

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¹One of the most recent and comprehensive studies of this nature is S. WASBY, *THE IMPACT OF THE UNITED STATES SUPREME COURT: SOME PERSPECTIVES* (1970).

²See Feeley, *Power, Impact, and the Supreme Court*, in *THE IMPACT OF SUPREME COURT DECISIONS* 218-29 (2d ed. 1973).

³See C. SHELDON, *THE AMERICAN JUDICIAL PROCESS: MODELS AND APPROACHES* 127-63 (1974).

⁴Stumpf & Turpen, *Law, Poverty and Change*, 2 *POLICY STUDIES J.* 195 (1974).

⁵Residency requirement elimination is a particularly useful area for impact study since the data allow for a comparison of migration both before and after its occurrence. In addition, the data are found in a time series rather than only at one point in time. Time series data are very rare in research concerning the impact of a change in the law. See SHELDON, *supra* note 3, at 160-61.

fare residency requirement decisions is underscored by one of the leading legal impact scholars, Stephen L. Wasby. In a recent article on welfare law, Wasby states that the elimination of residency requirements could be considered one of the most significant welfare law decisions.⁶ In Illinois, durational residency requirements were declared unconstitutional in *Johnson v. Robinson*.⁷ *Johnson* was one of several cases striking down residency requirements and its result was affirmed by the United States Supreme Court in *Shapiro v. Thompson*.⁸ In *Shapiro*, the Supreme Court held that the imposition of durational residency requirements for the purpose of inhibiting migration of indigents into a state constituted a constitutionally impermissible restriction of the right to travel⁹ and established invidious discrimination which denied equal protection.¹⁰ This decision has been the focus of criticism by state and local governmental officials ever since it was handed down in 1969. Officials of state governments have argued that without residency requirements the fiscal integrity of states offering relatively high welfare payments would be jeopardized. They have expressed fear that without residency requirements those urban, industrial states with high benefits would be swamped by an influx of needy persons seeking higher levels of welfare benefits.

For example, Vice-President Rockefeller, as Governor of New York, argued that the absence of residency requirements would precipitate the migration of low income individuals to New York from states with lower paying welfare programs.¹¹ Robert H. Finch, who was Secretary of the Department of Health, Education, and Welfare when *Shapiro* was decided, predicted that the decision would make national welfare standards "inevitable."¹² He added that: "To say that [*Shapiro*] will have a substantial impact on federal and state budgets is a massive understatement."¹³ The New York City Commissioner of Social Services argued that the city received a disproportionate share of the nation's welfare burden because it did not have a durational residency requirement.¹⁴ An Associated Press survey of welfare directors in states that had durational residency requirements prior to *Shapiro* found widespread concern that the decision would spur

⁶Wasby, *The Supreme Court as Enunciator of Welfare Policy*, 2 POLICY STUDIES J. 205 (1974).

⁷296 F. Supp. 1165 (N.D. Ill. 1967), *aff'd*, 394 U.S. 847 (1969).

⁸394 U.S. 618 (1969).

⁹*Id.* at 634.

¹⁰*Id.* at 627.

¹¹N.Y. Times, Jan. 30, 1969, at 20, col. 4.

¹²N.Y. Times, Apr. 22, 1969, at 1, cols. 6-7.

¹³*Id.*

¹⁴*Id.* at 22, cols. 7-8.

increased migration of the poor from low-benefit to high-benefit states.¹⁵

The same arguments have continually been advanced and have been paralleled by legislation.¹⁶ New York, for example, enacted into law a one-year residency requirement which was to be effective for a five-year "emergency period" after the state's administration had argued that such a requirement was essential to the state's "economic and social viability."¹⁷ This statute was enjoined after it had been in force only one month, and later it was declared unconstitutional.¹⁸ The district court refused to accept the state's argument that a "compelling governmental interest" was involved. A similar bill was approved overwhelmingly by the Illinois General Assembly,¹⁹ although it subsequently was vetoed by the state's governor, who doubted its constitutionality.²⁰ Similar efforts in other states, when successfully enacted into law, also have been struck down by the courts.²¹

¹⁵*Id.*

¹⁶*See, e.g.*, NEWSWEEK, July 26, 1971, at 31; N.Y. Times, June 9, 1971, at 1, col. 5; *id.*, June 24, 1971, at 27, cols. 2-5.

¹⁷N.Y. Acts of 1971, ch. 606.

¹⁸*Lopez v. Wyman*, 329 F. Supp. 483 (W.D.N.Y. 1971), *aff'd*, 404 U.S. 1055 (1972). A temporary injunction was granted on July 12, 1971, until the cause could be heard by a three-judge court. On August 9, 1971, the three-judge court found the statute in violation of the equal protection clause of the fourteenth amendment and permanently enjoined enforcement. The Supreme Court affirmed without opinion.

¹⁹Ill. S. 1225, 77th Gen. Assembly, 1st Sess. (1971) (passed in the Senate 51 to 4 and in the House 111 to 45).

²⁰1971 *Final Legislative Synopsis and Digest of the Seventy-Seventh General Assembly, First Session* 451. The governor's veto was overridden in the Senate, but similar efforts in the House failed. *Id.*

²¹CONN. GEN. STAT. ANN. § 17-82p (Supp. 1974) established a five-year emergency period during which the state would require a one-year residency for eligibility for public assistance and care. The residency requirement could not be justified on the basis of economy and was held unconstitutional on its face. *Rivera v. Dunn*, 329 F. Supp. 554 (D. Conn. 1971), *aff'd*, 404 U.S. 1054 (1972).

A Rhode Island statute which denied public assistance of any kind to persons who had not resided in the state for at least one year was declared unconstitutional as violative of the fourteenth amendment to the United States Constitution, notwithstanding a legislative finding that the requirement was based on economic factors. *Besaw v. Affleck*, 1 CCH 1972 Pov. L. REP. ¶ 1115.303 (D.R.I. Nov. 11, 1971).

In Massachusetts an advisory opinion by the Massachusetts Supreme Judicial Court held that enactment of a bill to establish a one-year residency requirement with a preamble setting forth emergency reasons for the enactment would violate the fourteenth amendment to the United States Constitution. Opinion of Justices to House of Representatives (Mass. 1971).

The Oregon Attorney General entered an opinion stating that imposition of a residency requirement of less than one year would violate the Supreme

Officials who favor durational residency requirements appear to rely on an implicit set of propositions about human behavior which would include the following:

- (1) There is a direct, causal relationship between the level of welfare payments in a state and the direction of migration by indigents such that the latter move from low-payment to high-payment states to receive higher welfare payments.
- (2) The use of durational residency requirements discourages migration by indigents to high welfare benefit states.

II. AN EMPIRICAL EXAMINATION OF THE EFFECT OF RESIDENCY REQUIREMENTS

While it seems doubtful that residency requirements will be successfully reinstated, it remains important to understand what the effects of residency requirements were. Negative consequences attend the failure to answer the question of whether the elimination of durational residency requirements actually resulted in a burden on the welfare systems of certain states. These negative consequences include (1) lack of knowledge of the effect of law upon society, (2) lack of an appreciation of the complexity and dynamics of law, and (3) continued confusion regarding the validity of arguments that residency requirements are useful tools of welfare administration.²² In order to test the effects of residency requirements, the Illinois welfare program is used as a case study. Illinois is a large industrial state with high welfare benefits in comparison to neighboring states, so it should be an ideal unit for a residency requirement impact study.²³

If residency requirements have an impact on migration, one would expect that the proportion of Illinois' welfare recipients with less than one year's residency before receiving benefits would have increased after the removal of the state's durational residency requirement in February of 1968.²⁴ This conclusion

Court's holding in *Shapiro v. Thompson*, 394 U.S. 618 (1969). ORE. ATT'Y GEN. OP. 6638 (1969).

²²In the spring of 1972 the authors mailed a questionnaire to each of Illinois' 101 welfare supervisors. Seventy of the supervisors returned the questionnaire. Fifty-six percent of the respondents agreed that some type of durational residency requirement is "absolutely necessary for the effective administration of welfare funds." Only thirty-one percent of the respondents believed that a durational residency test is "a useless tool for the administration of welfare benefits."

²³See generally ILLINOIS INSTITUTE FOR SOCIAL POLICY, WELFARE IN ILLINOIS: A BACKGROUND REPORT (1972).

²⁴Illinois was enjoined by the United States District Court for the Northern District from enforcing any residency requirements in its welfare

follows since only potential migrants, not current residents of Illinois, would have been discouraged by the durational residency requirement from seeking welfare benefits. Thus, once the disincentive was removed, migration should have increased, resulting in an increase in the proportion of migrant welfare recipients to non-migrant recipients.

In order to test this aspect of residency requirement impact, data were obtained for Illinois' two major welfare programs, Aid to Dependent Children (ADC) and Aid to the Aged, Blind and Disabled (AABD).²⁵ Data from June 1965 to June 1972 were used. This time frame was selected in order to provide a quasi-experimental time series analysis. This type of time series analysis is desirable since results of such a design are more trustworthy than results of a traditional after-the-fact impact analysis.²⁶ In addition, the choice of such a time frame is particularly desirable for this study for two reasons. First, it is well known that there tends to be a lag time between an initial decision to migrate and actual migration.²⁷ While it commonly has been believed that migration would occur immediately after the elimination of residency requirements, further reflection suggests that some time lag would occur. Since a time lag in the decision to migrate is often a matter of months rather than years,²⁸ a time series analysis which covers four years after the elimination of residency requirements should detect a lag time in the decision to migrate. Secondly, in measuring the effect of an event, it becomes more difficult to control for outside influences as the time from the event increases. One can be more certain that the impact of an event being measured is an accurate measure of impact

programs after February 13, 1968. *Johnson v. Robinson*, 269 F. Supp. 1165 (N.D. Ill. 1967), *aff'd*, 394 U.S. 847 (1969). See note 7 *supra* and accompanying text.

²⁵These data were abstracted from yearly summaries prepared by the Illinois Department of Public Aid. Overlapping two-year categories are utilized in Figures 1 and 2 and in Table 2 so that these data can be compared for periods before and after the elimination of the state's durational residency requirement. At the time Illinois' durational residency requirement was removed, only Illinois and New York provided benefits which met 100 percent of the basic needs of a family of four. California was providing 91 percent of these needs. U.S. NEWS AND WORLD REPORT, May 5, 1969, at 33.

²⁶D. CAMPBELL & J. STANLEY, EXPERIMENTAL AND QUASI-EXPERIMENTAL DESIGNS FOR RESEARCH 37-43 (1966).

²⁷Greenwood, *Lagged Response in the Decision to Migrate*, 10 J. REGIONAL SCI. 375 (1970).

²⁸ABT CORPORATION, THE CAUSES OF RURAL TO URBAN MIGRATION AMONG THE POOR 22-35 (1970).

if one can measure immediately after the event.²⁹ For this reason, measurement of the impact of durational residency requirements stops with 1972. Measurement after 1972 could be made, though there is no theoretical reason to believe the findings would be different from pre-1972 findings. Lag time has already been accounted for in the period measured which ends in 1972. In a methodological sense, the determination of causation becomes more tenuous for each time period after the elimination of residency requirements. Thus, even by the time period of June 1971 through June 1972, the determination that residency requirement elimination has caused migration is subject to considerable debate and criticism. The link of causation between residency requirement elimination and migration would be extremely weak in later time periods.³⁰

Table 1 shows that during the period from June 1965 to June 1972 there was a statewide average yearly increase of 19.3 percent in the number of ADC cases, with only the 1966 data evidencing a decrease in either the entire state's or Cook County's total caseload.³¹ The number of AABD cases, however, substantially increased only during 1971 and 1972.³²

Notwithstanding the overall increases in the absolute number of ADC cases from 1965 to 1972, Figure 1 shows that the

²⁹CAMPBELL & STANLEY, *supra* note 26, at 37-43; SHELDON, *supra* note 3, at 160-61; WASBY, *supra* note 1, at 41-42; Levine, *Methodological Concerns in Studying Supreme Court Efficacy*, 4 LAW & SOC'Y REV. 589-90 (1970). For a general discussion of method, see S. NAGEL, *THE LEGAL PROCESS FROM A BEHAVIORAL PERSPECTIVE* 12-28 (1969).

³⁰See authorities cited at note 29 *supra*.

³¹The categories presented are for ADC "combined cases," which are ADC cases receiving both assistance and medical care, and likewise for AABD cases eligible to receive both assistance and medical care. The theoretical justification for use of these categories is based upon the migration literature which suggests that migrants are full-fledged poor persons, rather than people merely seeking medical care.

³²The increase in the total costs of welfare in Illinois has been substantial. If all ADC expenditures and expenditures for medical care are included, the cost figures are as follows:

<i>Year</i>	<i>Total State ADC Expenditures</i>	<i>Cook County ADC Expenditures</i>
1963	\$140,849,668	\$105,025,188
1964	133,238,192	99,488,691
1965	140,649,229	104,210,746
1966	143,678,106	106,168,048
1967	152,809,612	113,680,676
1968	190,681,910	140,954,954
1969	240,671,726	179,509,698
1970	311,724,620	232,516,074
1971	476,556,598	350,216,165
1972	652,651,349	484,496,947

percentage of ADC recipients who have migrated to Illinois and have become welfare recipients within one year of their migration to the state has remained remarkably constant, both for the state as a whole and for Cook County alone. Migrants represented 3.2 percent of total recipients statewide for the period from June 1964 to June 1966, two years prior to the elimination of Illinois' one-year durational residency requirement. This is the same percentage which resulted for the latest time period of June 1970 through June 1972. Cook County, when considered separately for these two time periods, represented an increase of only 0.3 percent in the number of in-migrants. The latter figure is especially important because many critics of the *Shapiro* decision believed that, if an in-migration occurred, it would disproportionately be an in-migration to metropolitan areas such as Chicago.³³ The Cook County figures suggest otherwise, showing increases and decreases in the percentage of in-migrants which closely parallel those for the entire state, except for the most recent time period of June 1970 to June 1972. Figure 1 shows that in-migration into Cook County rose one half of one percent during that two-year period, whereas statewide in-migration decreased slightly. Neither set of data provides much support for those who would predict that the courts have had an impact on migration by eliminating residency requirements. Believers in a significant court impact would have predicted a sharp increase in the percentage of migrant welfare recipients. Although both Cook County and the entire State of Illinois experienced incremental increases of 1.1 percent or less during the first three of the four time periods after the elimination of durational residency requirements, only the statewide percentage ever exceeded

The increases in AABD expenditures are also significant:

<i>Year</i>	<i>Total State AABD Expenditures</i>	<i>Cook County AABD Expenditures</i>
1963	\$100,694,319	\$ 57,203,878
1964	96,974,641	54,801,081
1965	101,148,261	56,821,290
1966	113,817,940	61,872,434
1967	116,013,960	63,720,962
1968	165,411,897	77,748,853
1969	188,858,757	94,006,523
1970	199,957,913	108,169,605
1971	261,843,063	146,773,047
1972	356,020,590	220,517,750

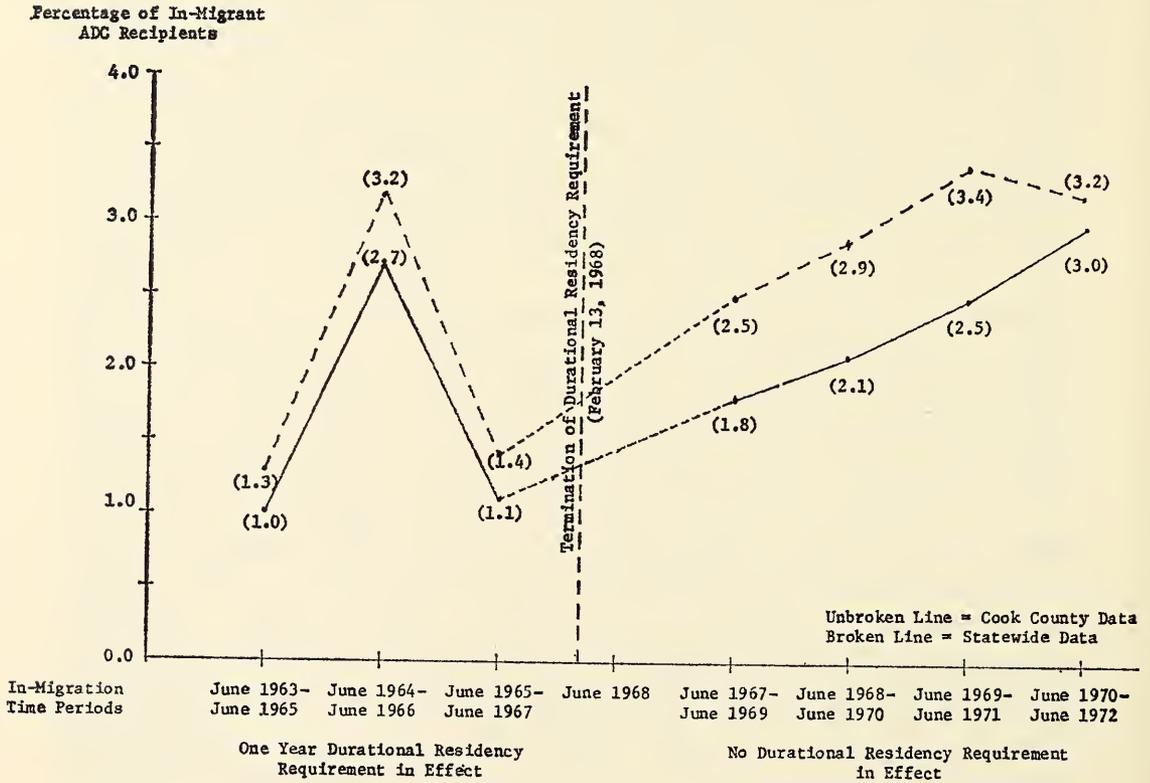
Data supplied by Illinois Department of Public Aid.

³³Migration patterns have tended to be to the most urbanized areas of a state. See G. GROH, *THE BLACK MIGRATION: THE JOURNEY TO URBAN AMERICA* (1972).

the highest pre-elimination percentage from June 1964 to June 1966, and then only by 0.2 percent.

Figure 1

Percentage of Migrant ADC Recipients for Illinois and Cook County Before and After the Elimination of Illinois' Durational Residency Requirement



Interestingly, in regard to the June 1964 to June 1966 time frame, there is no known reason for the increase in in-migration. One Illinois welfare official asserted that the increase was likely a random one.³⁴ If this thesis is correct, it follows that all increases in in-migration after the elimination of residency requirements might be random or at least the result of broad social and economic patterns not attributable to the elimination of residency requirements.

Similar data for AABD, shown in Figure 2, even more sharply contradict the view of significant court impact. Figure 2 shows that, in fact, a slight decrease in the percentage of migrant AABD recipients occurred, both statewide and for Cook County alone, after the elimination of Illinois' durational residency requirement. During the three most recent post-elimination measures, this percentage has risen an average of 0.7 percent per year, suggesting

³⁴Telephone interview with Mr. David Keil, Bureau of Research and Statistics, Illinois Department of Public Aid, Springfield, Illinois, August 2, 1974.

that an in-migration may have occurred during those time periods. But whether this increase can be attributed solely to an absence of a durational residency requirement is questionable in view of the initial decrease which occurred during the first two-year post-elimination measures.³⁵

Figure 2

Percentage of Migrant AABD Recipients for Illinois and Cook County Before and After the Elimination of Illinois' Durational Residency Requirement

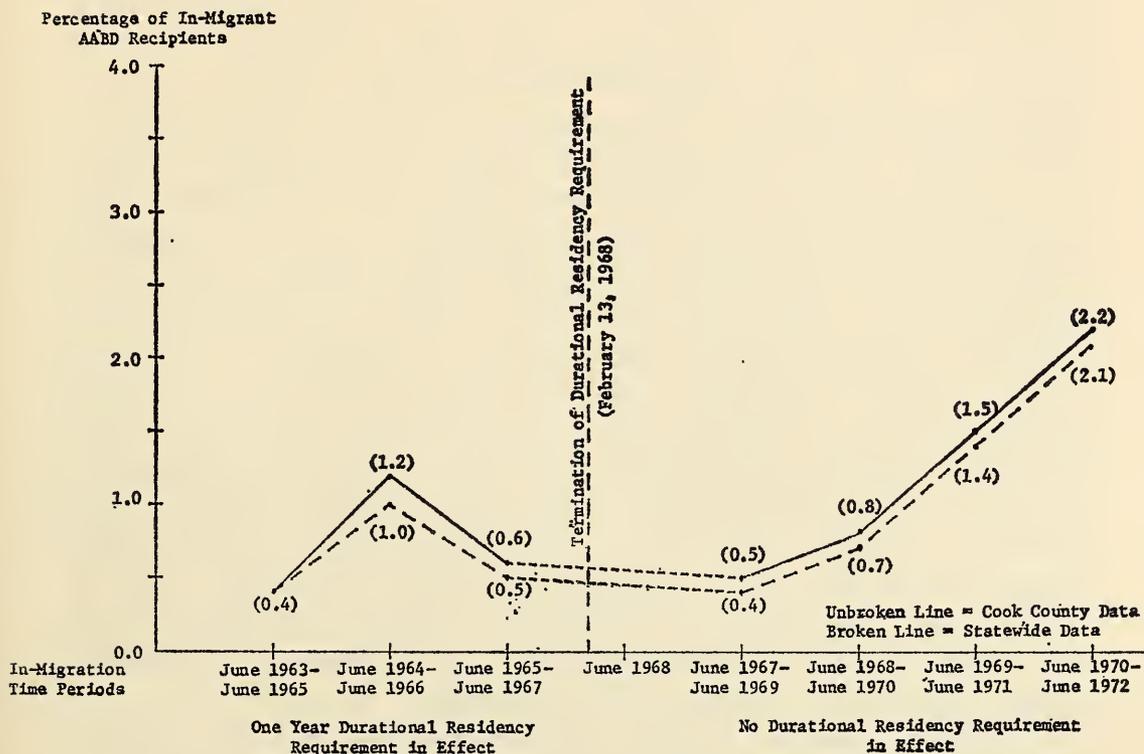


Table 2 provides particularly useful information on the migration impact of the elimination of durational residency requirements. It shows that even if the slight increases in migration proportions depicted in Figures 1 and 2 are attributed solely to the elimination of residency requirements, the decision has had little effect on increased migration. Of course, Illinois' in-migra-

³⁵The possibility of error caused by the absence of a control group with which to make this determination is partly obviated here by the utilization of three before and four after measures, thus diminishing the likelihood that the results were produced by intervening variables. For comments on the weaknesses and strengths of designs such as the one presented here, see Campbell & Ross, *The Connecticut Crackdown on Speeding: Time-Series Data in Quasi-Experimental Analysis*, 3 LAW & SOC'Y REV. 33 (1968); Lempert, *Strategies of Research Design in the Legal Impact Study: The Control of Plausible Rival Hypotheses*, 1 LAW & SOC'Y REV. 111 (1966); Ross, *The British Law on Drinking and Driving*, 60 A.B.A.J. 694 (1974). See also CAMPBELL & STANLEY, *supra* note 26, at 37-43.

tion might best be explained as migration for purposes other than merely obtaining higher welfare benefits.³⁶ Thus, an attribution of all migration to residency requirements is particularly striking because, even then, only a slight impact is shown.

If one assumes that in-migration should remain at a steady level both before and after the elimination of residency requirements, the average percentage of in-migrants prior to the elimination of residency requirements can be used as an estimate of the percentage of in-migrants after the elimination of residency requirements. Thus, for state-wide ADC, one might expect 1.97% of the post-residency requirement elimination recipients to be in-migrants. The actual percentages for each post-residency requirement elimination two-year time frame were 2.5%, 2.9%, 3.4%, and 3.2%. These figures suggest some increase in in-migration after the elimination of residency requirements, but the absolute differences between the actual migration figures and the migration figures which were estimated from the pre-residency requirement elimination are small. For the two-year period from 1967 through 1969, the total statewide ADC increase in in-migration which can be attributed to residency requirement elimination was only 738 persons or .5% of total cases for that time period. For 1968 through 1970, the total statewide ADC increase in in-migration was 1,583 (.9% of total cases). For 1969 through 1971, the ADC statewide increase was 3,428 (1.4% of total cases), and for 1970 through 1972, the ADC statewide increase was 3,950 (1.2% of total cases). At most, the elimination of residency requirements can account for an average increase in ADC statewide migration of only about 1% of total ADC recipients.

Table 2 presents similar figures showing that the elimination of residency requirements can account for only a small percentage of total migration to Cook County for ADC benefits. A maximum of .2% (200 persons) to 1.4% (3,227 persons) of total Cook County cases could be said to have migrated due to residency requirement elimination. The average percentage of recipients for Cook County which may be attributable to residency requirement elimination is .8% of all Cook County's ADC recipients.

Table 2 also shows that for AABD the percentage of total recipients who may have migrated as a result of residency requirement elimination is small. Indeed, for the statewide AABD recipients, there were 341 fewer migrants to Illinois than might

³⁶Note, *Durational Residency Requirements and the Mass Migration Theory: Getting to the Heart of the Current Welfare Dilemma*, 11 WM. & MARY L. REV. 472 (1969). See also DeJong & Donnelly, *Public Welfare and Migration*, SOCIAL SCI. Q. 329 (1973).

be estimated from the average percentage of in-migrants prior to the elimination of residency requirements. In the three other two-year periods, a maximum of .1% to 1.5% of statewide AABD cases may have migrated due to residency requirement elimination.

For Cook County AABD migration, 192 fewer persons migrated than was estimated by the pre-residency requirement elimination average of in-migrants. A maximum of between .1% (63 persons) and 1.5% (2,004 persons) of total AABD Cook County cases may have migrated as a result of residency requirement elimination.

III. CONCLUSIONS

The actual impact of the elimination of Illinois' durational residency requirement upon in-migration has been slight. No sudden upsurge of in-migration occurred in Illinois after the elimination of the durational residency requirement in February, 1968. In-migration, to the extent that it has occurred, may likely be the result of a variety of factors, particularly the economic prosperity of the state.³⁷ Even if the entire increase in welfare migration could be attributed to the elimination of the state's durational residency requirement, this increase does not appear great enough to support the commonly held view that the "welfare crisis" is a direct consequence of the elimination of durational residency requirements.³⁸

It is noteworthy that the resultant gap between the facts and the myth of welfare migration in Illinois has resulted in legislation which the former Governor of Illinois believed was contrary to the Federal Constitution. Consequently, it is hoped that this research will engender further studies to assess the impact of law on society. Only when the myths and realities of the impact of laws are laid bare can lawmakers confidently develop laws which are relevant to societal needs.

Only further research on the impact of law can fully examine the impact of law on society, but this research must close with a disturbing note. *Shapiro v. Thompson* was viewed as a major victory for law reformers.³⁹ Yet the effect of the decision on migration of poor persons was minimal. This research strongly suggests that law is not necessarily a major cause of societal change. Human migration at least does not significantly depend on legislation which places economic obstacles in the path of poor migrants. Behavior is instead much more complex than the commonly held notion that change in law causes change in behavior.

³⁷See authorities cited note 36 *supra*.

³⁸See authorities cited note 36 *supra*.

³⁹Wasby, *supra* note 6, at 205-10.

Appendix

Table 1 Number of ADC and AABD Cases in Illinois 1965-1972*

	<i>ADC Cases Statewide</i>	<i>Percentage Change</i>	<i>ADC Cases Cook County</i>	<i>Percentage Change</i>
June 1965	55,014	—	38,795	—
June 1966	52,238	(5.0%)	37,201	4.1%
June 1967	54,083	3.5%	38,740	(4.1%)
June 1968	64,112	18.6%	46,026	18.8%
June 1969	75,187	17.3%	54,167	17.7%
June 1970	95,099	26.5%	67,579	24.8%
June 1971	144,604	52.1%	103,415	53.0%
June 1972	176,598	22.1%	127,044	22.8%

	<i>AABD Cases Statewide</i>	<i>Percentage Change</i>	<i>AABD Cases Cook County</i>	<i>Percentage Change</i>
June 1965	86,636	—	46,425	—
June 1966	74,515	(14.0%)	41,026	(11.6%)
June 1967	70,933	(4.8%)	39,640	(3.4%)
June 1968	72,652	2.4%	40,773	2.9%
June 1969	75,629	4.1%	42,643	4.6%
June 1970	80,787	6.8%	46,172	8.3%
June 1971	92,592	14.6%	58,456	26.6%
June 1972	113,732	22.8%	77,915	33.3%

*Source: Illinois Department of Public Aid, Springfield, Illinois
() denotes negative

Table 2 Absolute and Estimated Migration in Illinois **

<i>Statewide ADC</i>	1967-69	1968-70	1969-71	1970-72
Total cases	139,299	170,286	239,703	321,202
Actual % in-migration	2.5%	2.9%	3.4%	3.2%
Estimated % in-migration	1.97%	1.97%	1.97%	1.97%
Actual in-migration	3,482	4,938	8,150	10,278
Estimated in-migration	2,744	3,355	4,722	6,328
Difference between actual and estimated in-migration	738	1,583	3,428	3,950
Difference between actual and estimated in-migration as a percentage of total cases	.5%	.9%	1.4%	1.2%
 <i>Cook County ADC</i>				
Total cases	100,193	121,746	170,994	230,459
Actual % in-migration	1.8%	2.1%	2.5%	3.0%
Estimated % in-migration	1.6%	1.6%	1.6%	1.6%
Actual in-migration	1,803	2,557	4,275	6,914
Estimated in-migration	1,603	1,948	2,736	3,687
Difference between actual and estimated in-migration	200	609	1,539	3,227
Difference between actual and estimated in-migration as a percentage of total cases	.2%	.5%	.9%	1.4%

Statewide AABD

Total cases	148,281	156,416	173,379	206,324
Actual % in-migration	.4%	.7%	1.4%	2.1%
Estimated % in-migration	.63%	.63%	.63%	.63%
Actual in-migration	593	1,095	2,427	4,333
Estimated in-migration	934	985	1,092	1,300
Difference between actual and estimated in-migration	(341)	110	1,335	3,033
Difference between actual and estimated in-migration as a percentage of total cases	(.2%)	.1%	.8%	1.5%

Cook County AABD

Total cases	83,416	88,815	104,628	136,371
Actual % in-migration	.5%	.8%	1.5%	2.2%
Estimated % in-migration	.73%	.73%	.73%	.73%
Actual in-migration	417	711	1,569	3,000
Estimated in-migration	609	648	764	996
Difference between actual and estimated in-migration	(192)	63	85	2,004
Difference between actual and estimated in-migration as a percentage of total cases	(.2%)	.1%	.8%	1.5%

** Source: Calculated from Table 1 and Figures 1 and 2.

() denotes negative