



August 16, 2011

Honorable Geoff Davis
Chairman
Subcommittee on Human Resources
1102 Longworth
Washington, DC 20515

Honorable Lloyd Doggett
Ranking Member
Subcommittee on Human Resources
1106 Longworth
Washington, DC 20515

Dear Chairman and Ranking Member:

On behalf of the Child Welfare League of America (CWLA) and our public and private member agencies that work directly with abused, neglected, and vulnerable children, youth, and their families, this letter is in support of the “Child and Family Services Extension & Enhancement Act” (HR 2790) to reauthorize Title IV-B of the Social Security Act. CWLA members are located in all fifty states and provide a range of child welfare services from prevention to placement and permanency services including child protection, family support and preservation, adoptions foster care, kinship care, and treatment services provided in residential settings. As a non-profit leadership and membership-based child welfare organization, CWLA is committed to engaging people everywhere in ensuring that all children and youth have the support that they need to grow into healthy contributing members of society.

Part I, Child Welfare Services (CWS) provides critical flexible funding for a broad range of services designed to support, preserve, and/or reunite children and their families. While we know that prevention services are underfunded, in light of current austerity we acknowledge that the maintenance of this program’s \$325 million authorization is positive. However, with the expectation of further cuts to discretionary funding levels over the next decade, it is critical to reiterate within this context that vulnerable children and families should be held harmless in all budget balancing strategies.

State Child Welfare Services Plans serve as a lynchpin for the continuum of strategies designed to prevent and ameliorate maltreatment. Through requirements encompassing case reviews, permanency planning, program development, agency administration, and systems collaboration activities, fundamental protections and core service provision is ensured for the vulnerable populations served with these funds. CWLA commends the subcommittee for strengthening these plans. H.R. 2790 requires the plans to respond to identified emotional trauma needs associated with maltreatment and removal, strengthens oversight of prescription medication monitoring protocols, and encourages activities to reduce time in foster care and address developmental needs especially for children younger than five.

Part II, Promoting Safe and Stable Families (PSSF) is an important funding stream for the operation of specific service categories. Though services overlap, the four specified categories in PSSF create important distinctions in types of families in need. The additional targeted activities bring attention



and resources to pressing needs including caseworker visits, substance abuse, court improvement, and mentoring for children of prisoners. CWLA supports the way that HR 2790 maintains this structure. While we see a need for additional resources, here again, we recognize the nation's strained financial condition. Therefore, we appreciate the continuation of \$200 million in discretionary funds and the room appropriators have to fully fund the program. In recognition of the difficulty of increasing funding, we think it is an important step that HR 2790 amends the reporting requirements to Congress to include actual spending in addition to planned spending by service category. We believe that increased tracking of these funds will further reveal that they are supporting necessary and effective programs for vulnerable children and families.

Courts are an integral component of the child welfare system, providing pivotal decisions of maltreatment findings and approval of permanency changes. PSSF is one of the few places in child welfare law where funding is provided for the courts. We understand that the decrease in court funding is due to Congressional Budget Office (CBO) accounting methods, but would encourage reinstatement of these funds in recognition of the need for strong courts. As opposed to weakening the program, we support its expansion to enable implementation of successful models in every state. At the same time, we support the way HR 2790 bolsters court improvement plans by clarifying that they should include requirements related to concurrent planning and the ability to bypass reunification efforts in certain egregious situations.

CWLA applauds the enhancement of the substance abuse and mentoring grants under HR 2790. Because all children affected by parental substance abuse, regardless of the particular substance used, deserve assistance, CWLA strongly agrees with the removal of the provision giving greater weight to applicants addressing methamphetamine abuse specifically. Mentoring studies show strong evidence in enhancing resiliency by improving many of the same behavior and developmental disruptions that result from a parent's incarceration. Therefore, we are in strong support of the reauthorization of the discretionary Mentoring Children of Prisoners grants through 2016, despite its lack of funding in FY2011.

CWLA welcomes HR 2790's addition of a section addressing data standardization and improved data matching. We understand that the administration has undertaken efforts in this direction and appreciate the recognition in both branches of government of the critical importance of sharing information across systems. CWLA is also very pleased to see the changes HR 2790 makes to IV-E of the Social Security Act, including the clarification of the educational stability requirement for children in care and the requirement for states to document savings from the de-link of adoption assistance payments. Furthermore, we support the related requirement to document spending on post-adoption services. This is a strong recognition of the importance of supporting lasting permanency.

Finally, CWLA supports the inclusion of the study on recruiting and supporting foster parents, adoptive parents, and kin caregivers. It is fundamental that we ensure the best possible interim care and permanency resources for maltreated children. To do so, those new parents and caretakers must be well prepared to provide stable homes for children. In this way, the inclusion of the study could be improved by explicitly looking at the state of training on child development and trauma-informed



care in the same way that respite care is currently included. Parents' ability to address behavioral problems resulting from trauma and developmental trajectories are important factors in the ultimate placement and permanency stability for children. Just as important as learning about the kind of supports offered to caregivers is the quality of the support that is given. For example, trainer credentials would be important measures to specifically request.

In moving forward, there are a few areas in which we think the legislation could be improved. While recognizing the many demands on caseworker's time, we do not think it is appropriate to weaken case worker visit requirements. We urge the committee to remove this provision. Monthly visitation is a critical means of ensuring the safety of children and providing needed supports to address treatment and daily care needs. Difficulties meeting this goal would be better addressed by reducing caseloads. Furthermore, we are concerned about the feasibility of accurately documenting the number of visits without a specified time frame and worry that without such clarification the requirement could become meaningless.

Finally, critical topics and special populations deserving of further attention and exploration, including disproportionality, kinship, siblings, tribal-state coordination, and older youth, could be better surveyed through additional data requirements and state plan requirements under CWS. Furthermore, under PSSF, the range of preservation and reunification services should specify mental health and substance abuse services for parents for the same reasons special grants are included as a targeted funding activity under PSSF. In addition, tribal Court Improvement Programs should be available to tribes who administer either Title IV-B or Title IV-E because of legal requirements like judicial determinations that necessitate fully operational dependency court systems.

CWLA appreciates your leadership in crafting this important legislation. HR 2790 makes positive improvements to IV-B and IV-E of the Social Security Act and we look forward to working with you on ways to further strengthen it during this opportunity for reauthorization. If you have any follow up questions, feel free to contact Sean Hughes, Director of Congressional Affairs at SHughes@cwla.org/202-590-8772 or Suzanne Ayer, Policy Associate at Sayer@cwla.org/202-688-4178.

Sincerely,

A handwritten signature in black ink that reads "Christine James Brown". The signature is written in a cursive, flowing style.

Christine James-Brown
President/CEO

Cc: Chair and Ranking Member of full committee and members of Subcommittee for Human Resources