



October 6, 2016

The Honorable Shaun Donovan  
Director  
Office of Management and Budget  
Executive Office of the President  
725 17th Street, NW  
Washington, DC 20503

Dear Director Donovan:

On behalf of the Child Welfare League of America, we urge you to advise the President to request funds in the President's fiscal year 2018 budget to address a number of important child welfare funding priorities that can help to address the child welfare continuum from prevention to intervention, placement and permanency.

We believe the following proposals are important to enhancing the well-being of children by addressing child abuse treatment, prevention and other critical child welfare needs. This request focuses on the discretionary budget.

*CAPTA (the Child Abuse Prevention and Treatment Act) State Grants*

We request that within the Child Abuse Prevention and Treatment Act (CAPTA) you increase funding for the state grants from the **current \$25 million to \$50 million**.

This is a modest increase but one we hope will set a new trend. The 2010 reauthorization of CAPTA (PL 111-320) required that if funding exceeds the FY 2009 funding level by \$3 million then the base grant for each state will increase to \$150,000 from the current total of \$50,000 per state. This funding to \$50 million will help exceed this minimum funding base and more adequately address the many important and critical requirements directed by CAPTA including requirements around legal representation, mandatory reporting of child abuse, and implementation of plans of safe care plans for infants exposed to alcohol and other substances—now expanded as part of the Comprehensive Addiction and Recovery Act (CARA).

CARA highlights a more recent uptick but not a new challenge throughout the history of CAPTA, the challenges provided by substance use.

HHS highlighted some of these challenges in their FY 2016 justification: in FY 2010, states reported that 6.5 percent of children with a substantiated or indicated reports were found to be victims of another substantiated or indicated reports within six months. In FY 2011 there was a slight increase in the rate from 6.5 percent to 6.7 percent in FY 2012, then 6.3 percent in FY 2013, meeting targets for each of those years. In FY 2014 the percentage of victims experiencing repeat maltreatment again rose to 6.5 percent, which did not meet the target of 6.1

percent. “We expect these indicators may increase as the opioid epidemic spreads. We feel this lends support to such an increase, at the very least.

In addition to these challenges, the recent set of recommendations by the Commission to Eliminate Child Abuse and Neglect Fatalities included a number of proposals regarding strategies to reduce fatalities. CAPTA state grants offer the first most significant strategy to begin to address a more comprehensive set of community-based solutions to this urgent need.

#### *CAPTA Discretionary Grants*

We request that within the Child Abuse Prevention and Treatment Act (CAPTA) you increase funding for the discretionary grants from the ***current \$33 million to \$66 million***.

Child Abuse Discretionary Activities account funds research and demonstration grants and contracts that build the evidence base for child welfare programs. It funds research regarding the identification and treatment of child abuse and neglect, and investigative, administrative and judicial procedures. It also funds projects, training, technical assistance; and can help evaluate methods and procedures to prevent and treat child abuse and neglect.

This funding stream provides important support to on-going supports including the National Child Abuse and Neglect Data System (NCANDS) Child Welfare Information Gateway, a national quality improvement center on infant-toddler court teams and other technical assistance and research that can build a better child protection system and greater initiatives to prevent child abuse and neglect.

Once again the Commission to Eliminate Child Abuse and Neglect Fatalities included a number of recommendations and these discretionary, research and technical assistance funds can assist in the first steps to implement their recommendations. We would highlight just a few recommendations of how these CAPTA funds could be effectively used to begin the implementation:

- Sharing data electronically and in real time across key state and local stakeholders.
- Review the screening tools and methodologies states use especially when reports involve child three and younger
- Accountability and training of mandatory reporters
- Greater and coordinated data for American Indian and Alaskan Native populations
- Strategies to address the disproportionate impact and involvement within the CPS of minority populations

This request is based not on the full need, or range of recommendations by the Commission but is instead envisioned as an initial small step. This funding could also assist in the implementation of care plans for infants exposed to substances. Such action would be consistent with both the Commission work and the CARA.

*Community-Based Prevention grants (CB-CAP)*

We also ask for a doubling of funding for a small but important community-based child abuse and neglect prevention program, the Community-Based Prevention grants (CB-CAP) ***an increase to \$80 million.***

Under the Community-Based Child Abuse Prevention (CBCAP), funds are allocated to state lead agencies to fund community child abuse and neglect prevention activities. Funds to strengthen and support families to prevent child abuse and neglect before it occurs. Prevention of child abuse before it happens is the first and a very important part of the child welfare continuum of services that include prevention, intervention, placement and permanency.

The CBCAP program was reauthorized as part of the CAPTA Reauthorization Act of 2010. Seventy percent of a state's grant amount is calculated on the basis of the number of children under 18 in the state, with a minimum award of \$200,000 per state. Importantly, the remaining part of the grant distributed to the states based on the amount leveraged by the state from private, state, or other non-federal sources and directed through the state lead agency in the preceding fiscal year for community-based child abuse prevention services.

Due to the opioid epidemic there is an even greater need for this underfunded part of the child welfare continuum of care.

Prevent Child Abuse America estimates that implementing effective policies and strategies to prevent child abuse and neglect can save taxpayers \$80 billion per year. The Centers for Disease Control and Prevention determined that the lifetime estimated costs of child abuse totaled \$124 billion and that the cost to one individual survivor was over \$210,000. The cost of doing nothing incurs direct costs in the future for foster care services, hospitalization, mental health treatment, and law enforcement. Indirect costs include loss of productivity, as well as expenditures related to chronic health problems, special education, and the criminal justice system.

As noted by HHS in the 2016 justification, "...national data indicate that parental substance abuse and housing instability is on the rise and has contributed to an increase of abuse and neglect, particularly among infants and young children. In fact, parental drug abuse was reported as a circumstance of removal in 8.5 percent more cases nationwide in FY 2014 than in FY 2013. Inadequate housing was reported as a circumstance of removal in 9.7 percent more cases in FY 2014 as compared to FY 2013."

CWLA urges you to use this critical program as an important strategy to prevent child abuse.

*Title IV-B*

CWLA urges you to ***restore funding to \$281 million*** for the preventive and protective services funded by the Title IV-B, Child Welfare Services (CWS). At this writing Congress has not yet extended this important program and we expect that situation will be rectified by the time next year's budget is submitted.

These funds provide a range of child protection and intervention services. This flexible child welfare fund may assist states in a number of areas but recent information suggests that states spend 41 percent of these funds on child protective services. Funding for this program continues its steady decline from 1995 when appropriations provided \$295 million. This request would restore funding to the FY 2012 level of \$281 million from the FY 2014 level of \$268 million.

#### *Promoting Safe and Stable Families (PSSF)*

This program, similar to CWS, has not yet been reauthorized at the time of this request. In addition, Congress has not yet addressed your request for 2016 to assist building tribal lands capacity. Regardless of what Congress decides we urge you to continue this request **to provide an additional \$20 million through PSSF** to assist tribal consortia and tribal governments to build capacity in addressing child abuse prevention and treatment services.

#### *Adoptions*

It is possible or even likely that when the final appropriations are approved for 2017 it will be at the FY 2016 level of \$38 million. We join with others in the adoption community in asking that for a one-time increase to replace a shortfall in the Adoption/Kinship Incentive fund. We ask that you go above the current Administration request of level **funding of \$38 million by increasing this total to \$66 million in 2017.**

In FY 2015, when HHS awarded the annual adoption incentives, the awards were much less than the fifty states had earned. The awards are based on increased adoptions and kinship placements that took place in previous federal fiscal year. Total FY 15 funding awarded was \$18 million despite the appropriations of \$38 million. The \$18 million awarded was only 38 percent of what states should have been awarded meaning that the total should have been closer to \$45 to \$46 million. Since last summer states were made whole by taking from FY 2016, this assures another shortfall heading into FY 2017.

Since the incentive fund was created under the Adoption and Safe Families Act (ASFA), HHS has been able to adjust for a lack of full funding in one year by taking from the following year's appropriations. In the beginning years Congress would recognize this and provide an extra amount of appropriation that attempted to address both the shortfall as well as the new year's awards. Congress has stopped appropriating funds in this way and in recent years has been cutting the fund from its high of approximately \$43 million to the current total of \$38 million.

Thus despite earning \$45 million last year states received \$18 million. That shortfall has been made up from the FY 2016 awards but it likely means that the new awards released in October of this year are likely to be limited to no more than \$10 million.

#### *The Adoption Opportunities Act*

CWLA requests a restoration of **funding for the Adoption Opportunities Act to \$40.5 million.** This is a slight increase that will restore funding to its 2015 funding level from the total of \$39 million in FY 2016.

The Adoption Opportunities program funds grants and contracts to promote adoptions with a particular emphasis on recruitment of minority populations and adoption of older children in foster care. There are more than 103,000 in the foster care waiting to be adopted.

As noted by HHS in last year's budget justification, "...as of September 30, 2015, 24,874 foster children previously photo-listed on the initiative's website had been reported as placed in permanent, adoptive homes. That number is projected to reach 25,000 by the end of the first quarter of 2016. Each month during FY 2015, the initiative averaged 4.2 million page views and more than 500,000 daily unique visitors to the AdoptUSKids website, in addition to an average of 1,886 inquiries per month via phone, email, web inquiry and chat regarding adoption of children from foster care, including those who are registered on the site. In FY 2015 an average of 168 new families per month with approved home studies registered on the website and became active users to search for children who may fit well into their families. Approximately 4,021 child or sibling group specific inquiries were made each month by registered families to the child's case manager via the website in FY 2015. The reach of the campaign is extended through a variety of social media channels, including Facebook (with an average weekly reach of approximately 170,000 people), Twitter, and YouTube."

#### *The Child Welfare Workforce*

As Congress prepares to finish appropriations this December it is likely they will not act on the Administration budget proposal and legislative requests in the vital area of child welfare workforce development. Although this is not within the discretionary category of spending we include it here because it is such an important challenge. CWLA asks that the next budget once again include a similar request to highlight the need for an increase in the supply and training of the child welfare workforce:

A proposal to allow the use of Title IV-E funding for BSW/MSW education. This proposal allows states to directly charge the costs of education to receive a BSW or MSW to the title IV-E program.

Title IV-E training funds is currently available for long-term training costs, including payments for persons preparing for employment or actually employed by the title IV-E agency. This proposal would eliminate the need for states to determine how much of a worker caseload is dedicated to IV-E eligible foster children and instead let states charge training costs regardless of the makeup of the caseload.

The current structure is called, "cost allocation." That means that before a state can apply a federal match of 75 percent in the training of public and private agency child welfare workers they must determine how much of that workers time is spent to assist children who are eligible for Title IV-E foster care and/or adoption assistance. The Administration proposal would do away with this complicated and sometimes discouraging process.

This proposal would be tied to obtaining either a BSW or MSW for title IV-E agency caseworkers, including contracted staff, with foster care administrative responsibilities, or persons preparing for such employment. By eliminating the allocation of costs it is hoped that

the proposal will decrease the financial burden and incentivize states and encourage them to support more caseworkers in obtaining BSW or MSW degrees.

The proposal includes a time-in-service requirement for recipients of this support.

In addition, the Administration proposed an enhanced Title IV-E match for caseworkers meeting this higher education standard. Citing recognized research that a better educated workforce will result in positive permanency outcomes for children in foster care and children who are at-risk of entering foster care, the proposal would encourage states to enhanced the workforce through this higher federal match rate for caseworkers with BSW or MSW degrees.

Thank you for your attention to our request. Your dedicated advocacy in support of programs to protect children and prevent child abuse and neglect helps to focus constructive public policies on these important issues. We hope we can count on your leadership to provide the resources needed to stem the tide of child maltreatment. If you would like additional information, please contact John Sciamanna, Vice President, Public Policy at 410-533-5857 or [jsciamanna@cwla.org](mailto:jsciamanna@cwla.org)

Again, many thanks for your advocacy on behalf of children.

Sincerely,

A handwritten signature in cursive script that reads "Christine James Brown".

Christine James-Brown  
President/CEO, Child Welfare League of America