April 2, 2018

Dear Commissioner Crossdale,

The Children's Agenda applauds Monroe County's Department of Human Services for the time and thought that County staff put into developing the 2018-2023 Child & Family Services Plan. While expansive, multi-year plans can be burdensome to staff, they also offer an opportunity to engage in strategic planning, identify areas needing improvement, and help communicate the Department's priorities to the community it serves.

We also commend the County for holding the public hearing at Monroe Community College on March 20th and being open to comments, questions, and suggestions from different stakeholders in the community. Transparency can be challenging given the sensitive nature of much of DHS's work, but County leadership were responsive to questions from The Children's Agenda and others that day. The presentations from department heads were informative and reflected the thoughtful way staff approach their work. Broader community input, generated by greater County publicizing of this public hearing, would have helped create a more responsive plan and increased community trust and support for DHS.

Overall Comments

In that spirit of openness and transparency, we suggest that DHS commit to holding a similar annual forum each year. Agency leadership could share accomplishments and challenges from the prior year, and identify and explain priorities for the upcoming period. Engaging service providers, advocates, parents, and other interested community members will help explain DHS's important role in Monroe County, build trust with different constituencies, and ultimately help improve the services and supports the County offers to children and families. A more collaborative and trusting relationship between DHS and different community stakeholders could yield positive outcomes down the road.

For example, at the forum on March 20th, a number of people mentioned the work Allegheny County, Pennsylvania has done to develop and implement an algorithm that predicts the likelihood of abuse and neglect, and the risk to a child, for cases called into a the child abuse hotline. That model is extremely impressive, and the child welfare leaders in that community have been ahead of the curve in terms of determining how to use data to support practice.

But what led to that predictive analytics model is the engagement of Allegheny County's child welfare leadership with the resources and skills present in the greater Pittsburgh community. The colleges and universities in that region were longtime partners with DHS, and had developed trusting and collaborative relationship with the County. For years, the Allegheny County Department of Human Services has shared data and internal reports on its website, and makes an effort to be transparent with the community. This history and

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ongoing transparency is the foundation that allowed the County and local partners to collaborate to develop this predictive algorithm.

Monroe County should strive to do something similar. Obviously, New York State social services law and HIPAA rightfully protect the confidentiality of DHS clients, but there is still a great deal that Monroe County can share with the community, along with greater partnerships it can develop with local institutions.

We also have specific comments about two components of the Child & Family Services Plan, detailed below.

Child Care

The Children's Agenda commends Monroe County for continuing to implement a number of key improvements to the operation of the County's child care subsidy system. This includes the 12 month re-certification, allowing receipt of the subsidy up to 200% of the poverty threshold, and paying for absences. We also support the 10% differential paid to national accredited child care programs. All of these policies work to improve accessibility to high quality child care for working families.

However, between multiple funding streams (including facilitated enrollment and the Upstate Revitalization Initiative funds), growing Pre-K programs for three and four year-olds, new federal regulations, several high profile child care centers closing, and a declining number of licensed family child care providers in Monroe County, the early child care and education system in Monroe County (like many other places) appears to be under a great deal of upheaval and distress.

Given all of these changes occurring to the child care system in Monroe County, we believe the County should convene a standing Child Care Workgroup. This group would be tasked with creating a stronger partnership between the County, providers, and the early childhood community to improve communication and problem solving around the administration of the child care subsidy program. We believe there are four major goals this workgroup could be tasked with:

1) Develop a plan to optimize scarce resources by integrating child care funding with other early childhood programs such as Pre-K, summer learning, and after school programs;
2) Share information, data, and perspectives on the state of child care services in Monroe County;
3) Help the community better understand the County's procedures and priorities;
4) When appropriate, engage the community to inform state and federal policies in alignment with County priorities.

Participants in this Child Care Workgroup would include leadership from the Department of Human Services, a cross-section of the child care provider community, representatives from the business community, advocates, philanthropy, city and other school districts, and the early childhood community.

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Specific Recommendations

We were pleased to learn that the County has been accepting child care subsidy applications since February of 2017. We have heard conflicting information from providers and parents about the availability of subsidies, and it is our sense that there is broad confusion in the community about the state of child care and child care assistance in the county. This, again, points to the need for a cross-sector Child Care Workgroup, as proposed above. Given that we are in the 13th month of open subsidy applications, a recent federal appropriation that expanded the Child Care and Development Block Grant, and state budget directives regarding the use of federal funds, we believe the County should take several concrete steps to make child care more affordable and accessible to more Monroe County working families:-

- Allow PA recipients and low income families enrolled in a bachelor's degree program to receive child care subsidies;
- Allow dislocated workers enrolled in a training program to receive child care subsidies;
- Reduce the family share from 35% of all earnings above the poverty threshold to 30% or 25%. This would reduce parent fees, incentivize enrollment, and make child care more affordable to low-income working families receiving the subsidy.

Finally, while the County has not closed applications for child care subsidies in over a year, we believe that establishing a waiting list is the fairest way to manage periods of scarce child care subsidy funds. The County should commit to always accepting applications, and use the waiting list to determine who should next receive the subsidy when funds become available. This would reduce confusion in the community, reduce the need to publicize whether the County is accepting applications or not, and provide information about the level of need in the community.

Child Welfare

The Children's Agenda was pleased to see that the strategies outlined in the County's Comprehensive Eight Point Plan for Child Protective Services were articulated more thoroughly in this document. We are particularly mindful of the need to increase and retain staff, and the multiple activities needed to ensure that staff have the training and supervisory support to effectively carry out their critically important work. We also agree that, given Monroe County's CFSR measures, reducing repeat maltreatment and shortening time to permanency for children placed in foster care should be important priorities for DHS over the next five years. We support DHS's strategies to increase timely permanency, and have a suggestion to improve the County's work to reduce recurrence of abuse and neglect.

Repeat Maltreatment

As a community, we must focus on preventing abuse and neglect from happening in the first place, by using proven approaches like evidence-based home visitation programs. But if children have been maltreated, our priority must shift to ensuring that they are safe, cared-for, and in permanent, loving homes. This requires an effective CPS staff with manageable workloads, sufficient training, and supportive supervision, as outlined in

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Monroe County's plan. But it also requires effective preventive service interventions that can work with parents to build on that family's strengths. Strong ties to community based organizations can also give families the support they need once CPS and preventive services have discontinued. Monroe County's improvement plan places a heavy emphasis on strengthening CPS, which is necessary, but not sufficient to dramatically reduce recurrences of maltreatment. Expanded preventive services and a robust system for referrals to community-based services are also critically important.

Families First Prevention Services Act (FFPSA)

The FFPSA was enacted in February of 2018 as part of the federal Bipartisan Budget Act and contains significant changes to the way child welfare services are funded by the federal government. Specifically, mental health, substance use prevention and treatment, and in home preventive services will be reimbursable under Title IV-E funding (under certain conditions). This is positive, although New York State already funds most of those activities through the uncapped preventive services match, so the impact in Monroe County could be limited.

More significantly to Monroe County, the FFPSA creates incentives for children to be placed in family-based foster care settings rather than congregate care placements. The law sets strict assessment and documentation requirements for children placed in residential care, and withholds federal reimbursement if a 30 day assessment is not completed on time. It also requires that all residential facilities meet certain standards, including accreditation. This is particularly significant to Monroe County because if Monroe County were a state, it would have one of the highest shares of children in residential care in the nation. While the number and share of children in residential care has declined considerably in the County in recent years, at 24%, the County's share is almost double the national figure of 13%.

Monroe County should begin preparing for the implementation of the FFPSA immediately, and The Children's Agenda believes this preparation should be reflected in this 5 year plan or the next annual update. The FFPSA will be disruptive to New York State, and it is the responsibility of counties to ensure that this disruptiveness is positive, rather than harmful. This law could result in the recruitment and retention of more kinship and therapeutic foster homes for teens along with high quality residential care for those children who need it, or it could result in significantly higher costs for residential care for Monroe County taxpayers.

Raise the Age and Juvenile Justice

Given that Raise the Age implementation begins in October 2018, we believe that there should be more detail in the plan regarding County preparations for this change. The impact of bringing 16 and 17-year-olds into the juvenile justice system will have far-reaching impacts on the community, including youth, families, courts, law enforcement, probation, schools, and both prevention and alternatives-to-detention services. The transition will be more effective if everyone affected by it understands and supports it well in advance of implementation.

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Conclusion

We look forward to continuing to work with you and your team to improve outcomes and services for children in Monroe County, and hope that the comments and recommendations detailed in this letter are helpful as you finalize your Child and Family Services Plan. Please feel free to contact me at pete@thechildrensagenda.org or 585-256-2620 if you'd like to discuss any of the comments and recommendations outlined in this email.

Sincerely,

Pete Nabozny

Director of Policy

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