

The Comprehensive Services Act for At-Risk Youth and Families: Comments to the Hanger Commission

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Chairman Hanger and members of the Commission, good morning and welcome to Fairfax County. On behalf of the members of the Fairfax-Falls Church Community Policy and Management Team I want thank you for coming to our community. We believe in the collaboration of state and local governments to address the very difficult issues faced by our families, their children, and our child-serving systems.

Just last week First Lady Anne Holton visited Fairfax to discuss with CPMT members and judges the work of the Council on Reform (CORE). With twelve other counties and cities, Fairfax County is engaged with the First Lady and the Office of the Secretary of Health and Human Resources to reform the child welfare system and improve outcomes for children in foster care. Specifically, CORE seeks to reduce the use of residential and group home care, increase the number of youth exiting foster care to permanency and expand family-based care. In the spirit of partnership within CORE the County and State are pursuing a voluntary agreement to identify the steps that each will take to achieve those goals. While the initiative seems to be off to a good start, much work is yet to be done.

In Fairfax we recognize the challenge of effectively serving at-risk youth and families with increasingly limited resources. To that end, one step we have taken is forming a local work group of public agency managers and private provider representatives charged with enhancing our system of care to serve more youth in the community and achieve better outcomes. That group is addressing the implementation of intensive care coordination and the promulgation of evidence-based practices, among many other issues. As recommendations are developed we will continue to work with the state as a partner, through CORE and other avenues, to explore any system changes necessary for improved outcomes and cost containment.

Another local challenge is responding to the newly defined CSA mandate created by the December 2006 Virginia Attorney General opinion on foster care services for youth meeting Child in Need of Services (CHINS) criteria. The new mandate appears to have been successful in diverting youth from foster care, but has broadened the eligibility for and access to funding for residential treatment. Last year seventeen youth from our community were placed out of their homes and into residential care through the new CHINS-foster care prevention mandate at a cost of \$856,000 in FY 2008. Even if the number of these placements and the associated costs do not increase, the local cost in FY 2009 for these youth will be over half a million dollars.

Additionally, implementing the new state-local residential match rates at the same time as the newly imposed mandate increases localities' fiscal exposure if costs continue to rise. To remedy this unintended consequence, the General Assembly should reduce the local match rate for congregate care, particularly for the new CHINS mandate.

As I mentioned Fairfax is working with providers to develop community services able to serve our youth who are currently in residential. The new CSA community-based match rate is an important tool in helping to accomplish that goal. We urge the General Assembly to maintain

the community-based match rate, and to extend it to the full range of community-based treatment, placement and educational services.

Intensive care coordination is another important and necessary tool for serving at-risk youth in the community. Individualized, strength-based care coordination is a common element of successful local systems of care around the country. While here in Fairfax we have a strong working partnership with our CSB on this project, the state requirement that designates CSBs as the preferred provider limits necessary local flexibility in choosing services and providers in order to meet their responsibility for serving at-risk children and youth. We do not support state requirements that specific services be provided to specific categories of youth, or the use of specific providers. The likely result of such requirements would be inconsistent and ineffective local implementation.

I am currently serving on a DMHMRSAS work group to promote and guide implementation of intensive care coordination throughout the Commonwealth. Considerable research has shown that there are common elements to effective intensive care coordination. The state can support successful implementation of that service through a robust state-wide system of training, coaching, and technical assistance to localities.

As you are probably aware, prudent administration and oversight of CSA requires a significant amount of administrative work, including routine collection, compilation, and submission of data on every youth served. It has been well documented that the current state allocation to local governments to support these activities is significantly below local costs. Additional funding for local administrative costs would lead to increased efficiency and effectiveness.

The implementation of last winter's General Assembly changes to CSA illustrates the need to place it within the purview of the Administrative Process Act. We encourage you to take such action. The Administration issued three sets of proposed guidelines for public comment. As "guidelines" rather than "regulations," the A.P.A required 60-day public comment period does not apply. All three comment periods were less than 30 days, including one which allowed only eight working days to respond. That is too little time for localities or stakeholder associations to coordinate a comprehensive response on guidelines which regulate the expenditure of hundreds of millions of state and local dollars across multiple agencies and systems.

Another step to enhance the partnership between the state and localities would be revising the structure of the State Executive Council to better mirror the shared state and local government role in CSA administration. The SEC is responsible for 22 separate powers and duties related to the programmatic and fiscal policies of CSA. A stronger representation of local governments that have the direct responsibility to select and purchase CSA funded services would improve policy making overall. Our suggestion is that a third local government representative be added to the SEC.

In closing, let me again thank you for holding a Commission meeting in Northern Virginia and specifically in Fairfax County. The Fairfax-Falls Church CPMT remains committed to partnering with the state in continually improving our ability to effectively and efficiently serve at-risk youth and their families in our community and throughout the Commonwealth.