



Comments on the Sunset Advisory Commission Staff Report on the Texas Department of Family and Protective Services

Texans Care for Children is a statewide nonpartisan, nonprofit advocacy organization dedicated exclusively to improving the wellbeing of Texas children. We look to our broad base of community-based experts—our partners and members throughout the state who together represent thousands of Texas children—to inform our work and help us in developing our legislative agenda. We also co-convene various stakeholder groups which bring together a wide range of organizations, families, and advocates around our areas of focus: early opportunity; infant, child, and maternal health; children’s mental well-being; child welfare; and juvenile justice.

The following comments address **Issue 6** of the Department of Family and Protective Services Staff Report (“DFPS Should Elevate the Importance of Its Prevention and Early Intervention Efforts and Better Use Existing Data to Evaluate Program Effectiveness”).

Recommendations 6.2: Transfer the Nurse Family Partnership Program to DFPS

Recommendation 6.3: Direct HHSC to work with DFPS to transfer the federally funded Texas Home Visiting Program to DFPS

Texans Care for Children does not support the transfer of the Nurse Family Partnership Program and the Texas Home Visiting Program to DFPS. Listed below are concerns regarding this transfer:

- **As programs designed to improve child and family outcomes across a wide range of domains, Nurse Family Partnership and Texas Home Visiting programs are best located under the direction of the Health and Human Services Commission.** Although prevention of child abuse and neglect is a central component of many home visiting programs, home visiting also targets areas including improvements in pregnancy outcomes, family self-sufficiency, parenting practices, school readiness, and early detection of developmental delays, among other domains. Some home visiting programs are designed such that reductions in child abuse and neglect are one of their primary measurable outcomes. The Sunset staff report’s prioritization of child abuse and neglect outcomes over other

home visiting outcomes may signify a troubling future under DFPS, where precedence for outcomes related to child abuse and neglect could overshadow the many other positive results of home visiting interventions. As an agency with oversight of the entire health and human services system, HHSC remains best suited to address home visiting's holistic approach to child and family wellbeing.

- **In light of the substantial challenges DFPS must overcome to strengthen its current prevention and early intervention programs, the Department is not positioned to house Texas Home Visiting and the Nurse Family Partnership.** The Sunset report does important work in identifying weaknesses in DFPS's current prevention efforts, including its lack of a unified, consistent strategy for prevention services, its inadequate use of data to inform its decisions and demonstrate outcomes to the Legislature and the public, and its historic emphasis on prevention as a contracting function rather than as a true program within DFPS. These are important issues for the agency to address, and underscore why DFPS is not currently positioned to lead one of the most important prevention programs in the state.
- **DFPS's de-prioritization of prevention efforts in the face of other budget demands may leave home visiting programs vulnerable under the agency's administration.** As the Sunset staff report observes of DFPS, "Prevention has long suffered from a lack of prioritization within the agency, relegated to a purely contracting function within the Purchased Client Services division of CPS," and "The program has suffered from significant funding reductions in times of budget austerity, particularly in 2003 and 2011." Ideally, DFPS will continue improving its current prevention efforts, as the Sunset report recommends, but uncertainty remains regarding how DFPS will react to future budgetary pressures on its prevention programs. Conversely, HHSC has been working successfully to develop its home visiting infrastructure and develop early childhood comprehensive systems (ECCS) within the state.
- **The success of home visiting under the direction of HHSC is strong evidence for why it should remain within the agency.** Under HHSC, home visiting in Texas has witnessed substantial expansion and increased funding at both the state and federal level. With its more extensive experience handling state and federal funding contracts, HHSC remains better suited to maximize funding opportunities to ensure the stability of the state's home visiting system. HHSC has developed the expertise to administer home visiting, and providers report satisfaction with and support for HHSC's handling of home visiting and emphasis on integrating early childhood service systems.

Respectfully,

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