

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 06, 2014 2:38:34 PM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 06, 2014 1:41 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 6, 2014 - 13:41

Agency: DEPARTMENT FAMILY AND PROTECTIVE SERVICES DFPS

First Name: Carolyn

Last Name: Simpson

Title: Director, Success By 6

Organization you are affiliated with: Lubbock Area United Way

City: Lubbock

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or  
Opposed:

ISSUE 6

Staff Reports comments and Recommendations- supporting:

- Preventing poor outcomes is always preferable to the incalculable costs associated with child death or injury or broken homes, the intensive intervention of foster care and the ongoing effects of trauma on people's lives. (Prevention has been shown to have longer and more effective outcomes than intervention and is more cost effective.)
- The Legislature created Alternative Response in 2013 as a flexible response system to address certain less serious cases by working with the family and providing services, instead of conducting a traditional investigation. DFPS has not yet implemented Alternative Response, but the agency expects CPS caseworkers will make referrals to certain prevention programs, particularly those that offer home visitation and other forms of parent education to reduce further risk to children (It is important to provide state funding to support prevention programs where referrals are made to).
- DFPS has not demonstrated the level of commitment needed to reflect its clear responsibility for prevention and early intervention efforts.
- DFPS currently has no unified, consistent strategy for prevention services and cannot be sure it is targeting the state's most pressing needs or using funds most effectively.
- Require DFPS to develop a comprehensive strategic plan for its prevention and early intervention programs
  - o Proactively involve stakeholders and communities in the planning process – this should include stakeholder meetings in all regions and particularly in regions where the rate of occurrence of abuse & neglect is significantly above the state average. ( It appears that regions with high rates of occurrence were ignored for funding over a very few unproven programs in a very few counties without any stakeholder input)

- o Provide support for existing community based prevention efforts.

Staff Report comments and Recommendations-opposing:

- While home visitation programs lead to a number of positive outcomes, research has shown these types of programs, such as HHSC's Nurse Family Partnership and Home Instruction for Parents of Preschool Youngsters (HIPPPY) to be the single best interventions for preventing child abuse and neglect.
- o Research source is not cited – significant studies exist showing alternative evidence based home visitation programs are equally or significantly as effective. NFP is limited to first time mothers less than 26 weeks pregnant – so the scope of client base it can serve is limited and may not necessarily match the demographics of needs in communities where a high rate of abuse and neglect is present. ( Parents as Teachers is a strong evidenced based program with the ability to serve more clients at a much lower cost than NPF or HIPPPY with excellent outcomes. HIPPPY and NPF should not be considered as the “single best interventions for preventing child abuse and neglect”.)

Any Alternative or New Recommendations on This Agency:

The report cites in 2013, the Legislature restored funding for prevention, adding \$26.8 million for the biennium, including funding two new programs:

- The health and well-being of children should not be political. It does appear, however, that consistency is lacking within DFPS for equitable funding.
- What is not stated in the report is that the allocation of this funding is particularly restrictive, with \$16 million reserved for Project HOPES serving only eight counties in the entire state.
- Funding for 2014-2015 has reduced the total number of counties receiving prevention funding.
- In several regions, counties with the highest rate of occurrence of abuse and neglect are receiving no funding at all. For instant in Region 1 – the largest in the state in terms of counties, only one out of 42 counties is receiving funding. Region 1 has the second highest rate of occurrence of abuse and neglect in the state.
- A significant number of counties receiving funding have rates of occurrence below the state average.
- Expansion funding, should not come at the cost of inadequate funding for existing prevention efforts in the State.
- Overall, DFPS funding appears to have been a “hit or miss” process with no attention to data or effectiveness of existing programs.

My Comment Will Be Made Public: I agree