



WILL LIGHTBOURNE
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES



EDMUND G. BROWN JR.
GOVERNOR

June 29, 2016



The Honorable Dianne Feinstein
United States Senate
331 Hart Senate Office Building
Washington, DC 20510

The Honorable Barbara Boxer
United States Senate
112 Hart Senate Office Building
Washington, DC 20510

RE: The Family First Prevention Services Act of 2016, S. 3065

Dear Senator Feinstein and Senator Boxer:



The California Department of Social Services, the County Welfare Directors Association of California, the Chief Probation Officers of California, and the California State Association of Counties are writing to formally request a temporary hold on S. 3065, the Family First Prevention Services Act. We make this request in order to allow sufficient time for California's concerns with the Act as currently drafted to be addressed without jeopardizing its passage.

The Act is a very forward-thinking piece of legislation, and we strongly support its intent and applaud the leadership of the authors. The Act is in most ways aligned with California's Continuum of Care Reform (CCR) effort, which is already underway and has identical goals of reshaping how the child welfare system supports families providing home-based care, rather than using congregate care placements for foster youth. It also cracks open the door for expanded federal funding for prevention services. These are ground-breaking steps forward.

As with anything important and complex, there are inadvertent errors and unintended consequences. Unfortunately, there are a few provisions of this massive and historic legislation that will have significant unintended consequences for California's efforts to continue its aligned reforms. Our concerns mirror those expressed by several other states that, with California, represent over one-third of the nation's foster youth population.

Some have suggested that we seek amendments through legislation next year, or that our concerns could be resolved through regulation and administrative interpretation of the Act once passed. However, our shared concerns are significant enough that we believe they need to be addressed by technical amendments aligned with the Act's intent, and that it is appropriate and timely to address them now. Given the uncertainty of an election year and potential changes in leadership, we seek assurance that the Act will achieve its potential and not impede reforms underway in California to improve the lives of our most vulnerable children and families.

We therefore respectfully request that our Senators place a temporary hold on the bill to allow these concerns to be addressed quickly, so as not to jeopardize passage of the Act in this Congressional Session.



Sincerely,



WILL LIGHTBOURNE
Director
California Department of Social Services



FRANK MECCA
Executive Director
County Welfare Directors Association of California



KAREN A. PANK
Executive Director
Chief Probation Officers of California



MATT CATE
Executive Director
California State Association of Counties