



# BOARD OF SUPERVISORS

**Keith Carson**  
**Supervisor, 5<sup>th</sup> District**

July 05, 2016

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

The Honorable Barbara Boxer  
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:

I write today concerning S. 3065, the Family First Prevention Services Act and ask that you oppose the legislation as currently drafted. Although Alameda County strongly supports the intent of the legislation to prevent children from being placed in foster care by providing at-risk families with early-intervention services, the bill would negatively impact Alameda County's ability to serve these youth.

According to analyses done by the California Department of Social Services (CDSS) and the County Welfare Directors Association of California (CWDA), several provisions of S. 3065 would conflict with State law, as well as certain federal mandates overlaying California's foster care reforms. As a result, if enacted in its current form, the legislation would ultimately make State and local Continuum of Care (CCR) implementation efforts more costly, complex, and unduly burdensome.

As currently drafted, the bill could restrict Alameda County's ability to effectively serve abused and neglected children. S. 3065 would greatly improve a state's ability to maintain children safely in their homes through its authorization of Foster Care Prevention Services and Programs, yet these provisions have the unintended consequence of limiting access to critical resources and services impacting reunification and family maintenance efforts, as well as the stabilization and treatment of high-end populations of youth including young people recovering from extensive trauma experienced through commercial sexual exploitation.

Additionally, S. 3065 could eliminate Federal funding reimbursements for several successful programs, such as the Transitional Housing Placement Program, which provides housing and services for foster children ages 16 and older. This program has been very successful in Alameda County assisting youth as they prepare for independence, and providing a placement home with services that is often better suited than a foster home or other setting to meet the needs of many transition age youth including youth who have been sexually exploited. The bill could also make some children ineligible for federal foster care benefits and includes onerous out-of-home placement requirements that would hinder Alameda County's efforts to implement the state's CCR. Time limitations on Qualified Residential Treatment Programs and their placements in particular pose a challenge to populations of youth, including sexually exploited children, who are likely to require additional treatment before transitioning to a family home.

Although I strongly support the intent of the legislation, I ask that the above concerns be addressed before the Senate takes up the legislation.

Sincerely,

Keith Carson  
Supervisor, Fifth District  
Chair, Personnel Administration & Legislation Committee