

October 12, 2023

The Honorable Jason Smith  
Chairman  
House Committee on Ways and Means  
1011 Longworth HOB  
Washington, DC 20515

The Honorable Richard Neal  
Ranking Member  
House Committee on Ways and Means  
372 Cannon HOB  
Washington, DC 20515

The Honorable Darin LaHood  
Chairman  
Subcommittee on Work and Welfare  
1424 Longworth HOB  
Washington, DC 20515

The Honorable Daniel Davis  
Ranking Member  
Subcommittee on Work and Welfare  
2159 Rayburn HOB  
Washington, DC 20515

Dear Chairman Smith, Subcommittee Chairman LaHood, Ranking Member Neal, and Ranking Member of the Subcommittee Davis,

On behalf of the American Public Human Services Association (APHSA), a bipartisan membership association representing state and local human services agencies, and its affiliate the National Association of Public Child Welfare Administrators (NAPCWA), we extend our sincere appreciation for the opportunity to contribute to the conversation regarding Title IV-B of the Social Security Act. APHSA is dedicated to advancing the well-being of all individuals and families by promoting innovative, effective, and efficient policies and practices in human services.

We are grateful for the Committee's commitment to modernizing the child welfare system and promoting the well-being of our nation's children. The recent hearing on *"Modernizing Child Welfare to Protect Vulnerable Children"* held on September 28, 2023, highlighted the urgent need for Congress to address the reauthorization of Title IV-B. The funds allocated under Title IV-B play a pivotal role for state, local and tribal child welfare agencies in providing vital and diverse supports to children and families. Importantly, the flexibility within Title IV-B offers child welfare agencies the ability to support the well-being of children and families beyond the narrow confines of Title IV-E, the primary source of federal child welfare funding. While Title IV-E addresses the needs of children in foster care, adoptive families, and children at imminent risk of foster care, Title IV-B plays a crucial role in proactive, upstream interventions that can prevent children from entering foster care and support families directly. A comprehensive and effective child welfare system must strike a balance between preventing family crises and providing essential support for children when foster care is required.

The testimonies presented during the hearing, notably Tracy Gruber's, Executive Director of Utah's Department of Health and Human Services, provided a stark portrayal of the challenges confronting child welfare agencies across the nation. The challenges articulated by Ms. Gruber are compounded by complex and antiquated funding structures. The intricacies of Title IV-B funding, while crucial, often create complexities that hinder the efficiency and impact these funds could have for families. Specifically, Ms. Gruber emphasized the necessity for increased flexibility in fund utilization. The limitations in the use of funding currently in place often limit agencies' ability to adapt swiftly to the unique and evolving needs of the families they serve. This lack of flexibility not only impedes the agencies' responsiveness but also hampers their capacity to provide tailored, effective support to children and families.

Furthermore, Ms. Gruber highlighted the need for streamlined reporting requirements. The existing bureaucratic processes, while intended to ensure accountability, often result in an overwhelming administrative burden for child welfare agencies. Simplifying and optimizing these reporting mechanisms would not only enhance accountability but also free up valuable time and resources. These resources, once redirected toward direct services, could significantly increase the impact of services for countless families. Addressing these structural challenges and fostering increased flexibility and efficiency within Title IV-B funding mechanisms are pivotal steps toward ensuring the stability and well-being for children and their families across the nation. Addressing these challenges requires a comprehensive reauthorization of Title IV-B.

We urge the Committee to consider the following key points in the reauthorization process:

✓ **Enhance Operational Efficiency:**

The current web of statutory requirements and funding structures creates substantial challenges for agencies on the ground. By simplifying Title IV-B, significant improvements in operational efficiency can be achieved. Streamlining the processes will ensure that the funds reach the families who need them promptly.

✓ **Alleviate Administrative Burden:**

Excessive and complex administrative tasks divert valuable resources away from families. A comprehensive reauthorization should focus on alleviating the administrative burden and simplifying reporting requirements, allowing agencies to dedicate more time and resources to providing direct services to children and families or invest in the workforce. Implementing transparent reporting mechanisms will enable better tracking of the allocation and utilization of funds, ensuring that they are directed where they are needed most. Congress should partner with ACF to review and improve IV-B reporting requirements and processes, aligning them with other federal child welfare programs.

✓ **Expand Flexibility in Fund Utilization:**

Flexibility is key to addressing the unique needs of diverse communities. By providing agencies with increased flexibility in utilizing IV-B funding, Congress is fostering a more adaptable and responsive approach. The freedom to allocate funds flexibly and adjust investment levels empowers child welfare agencies to create interventions precisely attuned to the unique needs of the families they serve. This tailored approach directly enhances child well-being and safety.

✓ **Increase Total Funding**

To fully realize the potential of Title IV-B, increased funding is paramount. Adequate financial resources empower child welfare agencies to expand outreach, intervene preventively, and strengthen community services. Enhanced funding facilitates comprehensive training for professionals, ensuring a high standard of care. Additionally, it fuels innovation, driving initiatives that can revolutionize child welfare practices. Advocating for increased funding isn't just a fiscal necessity; it's an investment in the future well-being of vulnerable children and families, amplifying the impact of Title IV-B and ensuring a robust support system.

We urge the Committee to consider these points and pass a comprehensive reauthorization of Title IV-B that is responsive to the needs of children, families, and the agencies dedicated to serving them. By simplifying Title IV-B and addressing the concerns raised, agencies can be empowered to fulfill their vital mission effectively. Thank you for your unwavering dedication to sound policymaking and your commitment to the well-being of families nationwide. We eagerly anticipate the positive impact of your efforts to comprehensively reauthorize Title IV-B and we stand ready to support and partner in any way we can. For more information, please contact, Meg Dygert at [mdygert@aphsa.org](mailto:mdygert@aphsa.org) or (202) 823-3200.

Sincerely,

Vannessa L. Dorantes, LMSW



Commissioner  
Connecticut Department of Children & Families  
Chair, National Association of Public Child Welfare Administrators