

April 6, 2005

To: The Honorable Denise Moreno Ducheny  
Chairwoman, Senate Budget Subcommittee No. 3

Honorable Members  
Senate Budget Subcommittee No. 3

From: Frank J. Mecca, Executive Director

Re: **Child Welfare Workload Standards and Funding  
Analysis (SB 2030)—CONCERNS**

The County Welfare Directors Association of California (CWDA) appreciates the interest of the Legislative Analyst's Office (LAO) in the important issue of workload standards in the Child Welfare Services (CWS) program. However, we have some concerns with their recent analysis which describes the state's progress towards implementing the recommendations of the SB 2030 Child Welfare Services Workload Study. Specifically, we believe their analysis overstates the progress made towards meeting the recommended minimum workload standards in the program.

In 1998, the Legislature passed and the Governor signed SB 2030 (Costa), directing the Department of Social Services (CDSS) to commission a study of workload standards in child welfare. The legislation represented a response to growing concerns over increasing workloads in child welfare, thereby overburdening social workers and threatening the ability of county child welfare agencies to meet its federal and state mandates in serving children and families impacted by abuse and neglect.

The resulting study findings confirmed what many believed—that existing child welfare budgeting standards, based on 1984 workload considerations, were outdated and inadequate. The SB 2030 Child Welfare Workload Study then established minimum and optimal caseload standards and compared these to baseline standards in place at that time. Remarkably, the findings revealed that California's child welfare workload standards were roughly *double* the recommended *minimum* level recommended by the study in many program components. The contractor commissioned to perform the study also found that the state was even further away from funding the "optimal" workload, or those standards that would be required to implement best practices known at that time.

Subsequent legislation required the development of a plan to implement the findings of the SB 2030 Workload Study. This plan was released June 2002; however, budget constraints have since prevented the state from allocating sufficient funding to implement the study's recommendations even to the *minimum* level recommended. In the meantime, to partially mitigate workload concerns and resulting impact to children and families, the Legislature and Governor have provided CWS some augmentation funding to help alleviate local child welfare workloads.

**LAO Analysis Misses Key Variables:**

The LAO analysis states that California has made "*significant progress*" towards meeting the *minimum* recommended SB 2030 workload standards since the study's release in April 2000. Their analysis takes into account CWS augmentation funds, "hold harmless" funding added to the base allocation, and funding provided in support of children living with non-related legal guardians.

However, the LAO analysis uses a hypothetical standard of what caseloads should be per program component—a caseload yardstick—and compares this to the total amount budgeted in the CWS program—a budgeting yardstick. Our concern with this type of analysis is the "apples to oranges" comparison of individualized case ratios on one hand, compared to the cost of operating the CWS program and delivering appropriate and necessary services on the other hand. We know that counties use CWS funding for other vital functions, in addition to case-carrying workers, to serve children and families in this program.

Therefore, we believe there are several factors that the LAO analysis misses in determining the state's progress towards meeting the SB 2030 recommended workload standards in CWS. For example, the LAO analysis assumes that all FTE's are case carrying social workers in each program component. We believe this misses a significant number of non-case carrying workers, particularly specialty workers. In many counties, this includes specialty workers to perform enhanced relative searches and approvals, foster parent recruitment and retention, and implementation of best practices such as Team Decision Making (TDM) and Family Group Decision Making processes.

In addition, the State has failed to include a cost of doing business adjustment since fiscal year 2000/01, despite the fact that local bargaining agreements usually include such increases. These additional costs, at an average of 4% - 5% per year, have been absorbed completely by local county governments. Failure to account for the underfunding of direct costs has the result of significantly overstating the state's progress toward SB 2030 implementation—by at least one third.

Furthermore, recent federal and state mandates have increased the complexity and amount of daily social work activities. The federal Adoption and Safe Family Act (ASFA) and California's Child Welfare System Improvement and Accountability Act (AB 636, Statutes of 2001) have resulted in new efforts to improve CWS outcomes across all service components, without sufficient new funding to support these efforts. For example, county performance is now measured by outcomes and indicators that include recurrence of abuse, number of foster care placement moves experienced by children, length of time to permanency, and siblings placed together. In response, counties have redirected staff from case-carrying activities towards other activities designed to achieve desired outcomes. These activities include increased planning and collaboration with community partners, enhanced prevention and early intervention efforts, utilization of research-based tools such as Structured Decision Making, and supports to foster parents and adoptive homes to maintain stable placements.

Other costs not considered in the LAO analysis include additional costs for direct services and ancillary services. Federal and state funding for direct services fails to cover the cost of services that are necessary to help families meet their case plan objectives in order to safely reunify with their children, maintain stable placements, and improve child well-being. Examples of additional direct services include as dependency drug court, enhanced visitation services, drug testing, respite care for caregivers, and mental health services for foster children.

**CWDA Survey of 10 Large Counties:**

CWDA is in the process of collecting and analyzing data from the state's ten largest counties (based on CWS caseload) and will provide its findings to the Legislature shortly. Overall, CWDA believes that the LAO's analysis of budgeting methodology does not accurately reflect actual county practices. Preliminary findings are bearing out our concerns. For example, Orange County uses nearly 30% of its allocation to support non-case carrying workers or provide additional direct services to children and families.

**Proposed Legislation To Track Progress:**

CWDA supports the LAO recommendation for legislation to require annual reports to the Legislature of the State's progress towards implementation of the SB 2030 Child Welfare Workload Study recommendations. We believe an annual report would provide policy makers with timely information for consideration during the state budget process. However, the report must also consider the additional factors not identified by the SB 2030 study to reflect actual costs of providing child welfare services, including the cost of doing business, unfunded or underfunded legislative mandates, and direct services. CWDA can work with legislative staff to craft the appropriate language to reflect these issues.

UC Davis/CPPR Report of Child Welfare Budgeting Issues  
Appendix B

CWS Workload Standards (SB 2030)  
April 6, 2005  
Page 4

Again, CWDA will provide additional information based on responses to our county survey later this month. In the meantime, please contact me if you have any questions.

Thank you for your consideration of our concerns.

cc: Anastasia Dotson, Consultant, Senate Budget and Fiscal Review Committee  
Eric Swanson, Consultant, Senate Republican Fiscal Office  
Terri Delgadillo, Deputy Secretary, Health and Human Services Agency  
Fran Mueller, Department of Finance  
Todd Bland, Legislative Analyst's Office  
Dennis Boyle, Director, Department of Social Services  
Kelly Brooks, CSAC  
County Caucus