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May 12, 2020

Transmitted Via Email to:
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North Dakota Department of Human Services
Children and Family Services Division
Attn: Title IV-E Prevention Plan
600 E. Boulevard Ave., Dept. 325
Bismarck, ND 58505-025

Dear Department of Human Services,

Lutheran Social Services is grateful to the state for its early adoption of the Families First Prevention Services Act and the collaborative nature the Department of Human Services has brought to the creation of the 2020-2024 Title IV-E Prevention Services and Program Plan. In particular, we appreciate the inclusion of private non-profit providers throughout the plan. The array of supports and services that surround child welfare is broad and thorough. We are thankful for this effort.

Comments:

Page 4: Introduction. This is an impressive illustration of the broad array of supports and services that surround child welfare, and how it is inclusive of private providers such as LSSND.

Page 6: In the area of Motivational Interviewing we appreciate that the state plan recognizes the need to include private providers in the effort to “train up” motivational interviewing. It is key.

Page 10: Version of Book or Manual. The third sentence should read; “This approved adaptation will **also** be implemented with this plan.” This will clarify that both the regular Healthy Families as well as the adaptation will be implemented.

Page 20: Within the Evaluation process including Quarterly Meetings we would recognize this is an active and on-going process, and again to include contracted vendors in these processes helps to have strong and engaged partnerships between the public and private sectors.

Page 20: Evaluation Design. LSSND would recommend that Kinship Navigator Support programs be added to this list. Even though at this time the Clearing Bureau has not yet identified any reviewed programs that are well-supported or supported, it is hoped that approaches will be added over time that meet the criteria and can be adopted. By indicating it as an allowable service to be added once programs are identified would pave the way for adaptation. The LSSND report to DHS provided in October 2019 following a development grant provides information relevant to this proposed plan. Kinship care supports are much needed and critical to the well-being of children in North Dakota.

Page 31: In the second paragraph, does the term “child welfare worker” within this context imply private providers as well, who may be engaged in direct delivery of services, or only those who may be referral workers?

Page 32: In the section, Provider Responsibility. When possible, the on-going assessments called for related to safety and risk that are already an on-going and recognized part of the well-supported and supported programs should be accepted as those reports, so as not to over-burden the families with additional measures.

Page 34: LSSND appreciates the sentence, “Key to successful frontline staff is solid, competent supervision.” Consider adding language around the importance of reflective supervision as opposed to just administrative and clinical forms of supervision.

Page 35: The reference to specific agencies, PATH of ND and Adults Adopting Special Kids (AASK), does not seem appropriate when other agencies are likewise required to participate in the training.

Additionally, North Dakota’s training curriculum could be further strengthened and demonstrate the importance of public private partnerships in the delivery of services to children and families if there were a companion overview (i.e., a brief model of training) that could be consistently provided and adopted by all who are contracted to provide services. This companion training could be webinar based and have a simple end goal of better alignment and partnership between referring workers and private providers.

Page 37: Section 9. The second paragraph. LSSND would recommend the definition of a candidate for foster care read: “A candidate for foster care is a child who is at risk of out of home placement **and/or** has an active case plan to maintain the child in the child’s home.”

Pages 37-38: Characteristics for Eligibility. This is a great list, that would qualify many families. However, again it makes us question the use of the word “and” in the definition of a candidate. We particularly appreciate the definition in Item #9 because so many families are involved in multiple formalized systems. It would be good to lessen the burden of involvement in too many.

Page 43: Appendix D. Eligibility Referral: There is no mention in this section that a candidate must have an active case plan to be eligible.

Page 44: Appendix E; Title IV-E Process Flow: LSSND would appreciate clarification on who can submit a referral in the web-based system, and additionally how the family is or is not involved in this process. Do they know? Do they have consent?

Page 45: Candidacy IV-E Federal Regulations. #6: This statement would make it appear as though there has to be an open case. We wish that there would be preventative opportunities made available to families at risk without an open case.

Technical and Format Suggestions:

Page 7: We would suggest listing the programs alphabetically unless there is a particular hierarchical order required.

Page 20: Within the listing of Prioritized Interventions the Healthy Families title is misspelled. Health needs a “y” added.

Page 22: There should be a space separating the Parents as Teachers section from the Healthy Families America section.

In conclusion, we thank the Department for its partnership and forward thinking in early adoption of the Families First Prevention Services Act. The work in development of this plan has been thoughtful and inclusive, and we are most appreciative. Lutheran Social Services looks forward to continuing this good work with so many others, providing North Dakota families and children with foundations of support, strength and resilience.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Monson', with a long horizontal line extending to the right.

Eric Monson
Interim President and CEO
Lutheran Social Services of North Dakota
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