

Dear Mr. Whitley,

The Nevada Children's Commission welcomes the chance to provide input on the Division of Child and Family Services (DCFS) budget priorities to address the needs of children who are involved with the Family Court System. The Commission has identified the area of Behavioral Healthcare as an overarching need that cuts across the Child Welfare and Juvenile Delinquency systems in Nevada, as youth with intensive behavioral health needs are at increased risk of involvement with these courts. As a result, the bulk of the Children's Commission's recommendations for funding priorities are centered on behavioral health services. The regional Children's Mental Health Consortia, the Nevada Behavioral Health Commission, and the DCFS Children's System of Care workgroups have engaged in extensive strategic planning efforts which greatly informed the development of the proposed priorities outlined below.

**Priority One: Expand behavioral health services for youth that focus on keeping families together and providing intensive services in local communities.**

The Commission recognizes that youth in the child welfare and juvenile justice systems have higher prevalence rates of serious mental health conditions than youth who are not system involved. Parents are often faced with having to relinquish custody of their child in order to access needed behavioral health services. The symptoms of some behavioral health conditions can also lead to a child's arrest, lengthy time in secure detention and probation supervision within the juvenile justice system. Lack of availability of intensive community-based services or local treatment centers result in an overreliance on placements out of the child's home community. For children who require out of home placement, intensive home-based treatment is necessary to achieve a successful return to family life. DCFS has committed to a family-centered System of Care approach to provide tiered service coordination accompanied by a strong service array to support youth and families in the least restrictive setting. The expansion of the System of Care will lead to less children entering the child welfare and juvenile justice system and more effective care for those children who do. We offer the following recommendations towards these ends.

- Establish a DCFS Assessment Unit to implement a "No Wrong Door" approach for entry in the Children's System of Care. This unit would provide a coordinated assessment for youth who are at risk of out of home placement with a focus on developing intensive community-based plans of care that promote youth remaining with their family whenever possible.
- Expand wraparound and intensive service coordination services to support youth remaining in their home communities.
- Address staff turnover in the Wraparound In Nevada program to include position reclassifications to bring Wraparound facilitators' salaries in line with similar positions in the community.
- Develop specialized assessment, wraparound, and service coordination approaches to specifically support vulnerable youth with Intellectual Disabilities, Autism, Co-Occurring Substance Use, and trauma related to Commercial Sexual Exploitation.

- Expand Wraparound and Service Coordination for youth placed in residential centers to promote family engagement in treatment and comprehensive services when youth return home.
- Expand Family Support Services so that each wraparound and service coordination team is supported by family/peer support services.
- Expand access to respite services for parents and foster parents who are raising youth with serious emotional disturbance.
- Develop short-term (45-60 days) residential services to provide medication stabilization, crisis resolution, family therapy, and intensive wraparound services to facilitate a child's safe return home. This level of care could be achieved by reopening existing Desert Willow beds, expanding Adolescent Treatment Center in Reno and/or recruiting private providers.

**Priority Two: Develop service arrays in each jurisdiction to support implementation of the Family First Prevention Services Act.**

Child Welfare Agencies will be implementing the Family First Prevention Services Act (FFPSA) as outlined by the federal government. FFPSA places limits on the use of congregate care unless the facility meets the high standards to become Qualified Residential Treatment Programs. FFPSA also focuses on preventing youth from entering foster care and focusing on timely reunification while assuring child safety. The Commission suggests the following priorities:

- Develop an infrastructure to identify and support the implementation of evidence-based practices that meet the unique needs of each jurisdiction. This infrastructure could be accomplished with State positions or in a public private partnership.
- Explore innovative approaches to support enhanced foster care services for youth with specialized needs (e.g. youth with Autism and/or Intellectual Disabilities, youth returning from residential care, youth who have been sexually exploited).

Thank you for considering the priorities described above. We are aware that they constitute a tall order which cannot be accomplished without significant funding. We would welcome the chance to have further discussion regarding prioritizing efforts for this and future budgets.