

**Talking Points for Joint Subcommittee for Health and
Human Resources Oversight
November 29, 2017 – 10:00
House Committee Room, Pocahontas Building**

Chairman Jones and Members of the Joint Subcommittee:

Thank you for inviting testimony on this very important issue and thank you for allowing me to speak with you today. I am Mary Biggs and I'm a member of the Montgomery County Board of Supervisors. I'm also the immediate past president of the Virginia Association of Counties and a member of the State Executive Council for CSA.

I'd like to say at the outset that local governments want what is best for the children and families that we serve in CSA. We make significant financial and administrative contributions to both CSA and K-12 education. In 2016, localities spent approximately \$127 million for CSA service costs alone. During the same year, localities spent \$3.9 billion above the required local effort for K-12 education. We recognize the need to invest in children and their future for our communities' sake. However, we share the concern about the rising cost of certain services provided through CSA, in particular the private day placements for special education.

Local representatives have been involved in the conversations on this topic over the past several years, and have expressed serious concern about proposals that have been under consideration that would make major changes to the structure of CSA. We view CSA as a state-local partnership and we would

be strongly opposed to any changes to the program that would limit the state's participation. We appreciate that your staff will be continuing to work on this issue in the months ahead and would like to take this opportunity to offer for your consideration some suggestions on areas for possible exploration.

Metrics. One of the recommendations from last year's work group was for private providers, the Department of Education, and local school divisions to work to identify some evidence-based metrics that could be used to determine what progress children in private day placements are making, both in academics and in managing challenging behaviors. It may be beneficial for some of these metrics, particularly regarding behavior, to be used as goals in a student's IEP so that parents, providers, and the student him- or herself knows what goals need to be met in order to transition back to the local school division.

Assistance with contracting. Some CSA coordinators, especially those in smaller jurisdictions with smaller caseloads, believe that they do not place a high-enough volume of children to be able to negotiate rates with providers. Localities would be interested in exploring an arrangement in which the state could negotiate some contracts with providers, and localities could then purchase off those agreements on more favorable terms than they might be able to negotiate individually.

CSA wrap-around funds. Last year, the State and Local Advisory Team (SLAT) did some research on awareness and use of these funds, which may be used for services in the home

and community for a student with a disability, when the needs associated with that disability extend beyond the school setting and threaten the child's ability to remain in the home, community, or school setting. Such services may include in-home counseling, Applied Behavior Analysis, and mentoring, and could help a child stay in his/her local school division, for example, by funding behavioral health aides before and after school. SLAT's survey indicated that localities do not always avail themselves of these funds because the process for requesting and expending them is cumbersome and the overall amount available is capped. In addition, the match rate for these services was increased in FY 2014, resulting in a higher local match rate than what is required for other community-based services. Both the Commission on Youth and the State Executive Council have been supportive of revisiting that decision, and we would echo that view.

Support for serving children with higher-level needs in local school divisions. Finally, and most importantly, local governments understand that some children's needs are so significant that they cannot be met within the local school division and that for those children, private placements are the best option. However, localities are interested in local school divisions being able to bolster their offerings so that they can serve some children who otherwise would be candidates for private placements. Right now, a locality offering additional supportive services beyond SOQ-recognized staffing generally must do so with its own resources, but once a child is placed outside the school division, state CSA funds are permitted to share those costs. We would be interested in revisiting the DOE guidance on the ability to use CSA funds to serve children in

their local public schools, and would also be interested in other creative approaches to allowing more regional collaboration among school divisions.

In closing, we thank you for your engagement on this important topic, and we stand ready to assist you and your staff in your further deliberations. Thank you for your consideration.