

# HUMAN SERVICES AND EDUCATION

## INTRODUCTION

Every county in the United States administers and funds part of the cost of strengthening communities and protecting and enhancing families. The Human Services and Education Committee of the National Association of Counties (NACo) exists to support counties in this work. The role of counties varies widely from state to state, but human services and health expenditures are among the largest parts of county budgets.

NACo supports a broad, comprehensive array of services for families, children, individuals with disabilities and the elderly. Social services, public health, preventive services for children and youth, early childhood development, parent education and support, childcare, and other programs that encourage and support families also strengthen communities throughout our country.

Poverty is a national problem and requires a national solution. Federal efforts to reform public assistance must recognize that poverty is influenced by national economic factors that are not within the control of local or state governments.

Families in poverty usually need support services to become self-sufficient. Education and job training, childcare, Medicaid, mental health and substance use disorder coverage, housing, transportation, veterans services claims representation and work programs are supports that often involve counties. Federal requirements in these programs should be flexible and coordinated with local partners to provide a seamless range of services.

Programs mandated by the federal government should be fully federally funded. It is important that new programs do not duplicate existing state and local efforts; the federal government also must provide adequate time to implement major changes to prevent disruptions in program delivery.

New federal programs should be integrated with an appropriate, existing administrative delivery system. Congress should encourage coordination with state and local governments when seeking citizen input, such as advisory committees to oversee program development, so that there is no duplication of state and local coordinating efforts.

NACo believes decisions on laws and regulations should be made using data and measurable outcomes. Scrutinizing existing and proposed mandates using these standards will help reduce unnecessary and unfunded mandates, streamline government, and use limited resources effectively, which will benefit clients and constituents alike. NACo urges the federal government to ask these key questions when considering changes:

- Was comprehensive data used to define the problem and desired outcome?
- Were experts who administer the affected programs engaged?
- Will it streamline or add layers of bureaucracy?
- Is it redundant or inefficient?
- Are current local staffing levels sufficient to comply with additional requirements?
- Will we be able to measure the outcomes to be achieved by this change?
- Is there adequate federal funding to pay for all direct local costs?
- Are there other models that may provide better outcomes?
- Have local elected officials been consulted?
- Has there been collaboration between federal, state, and local agencies?
- Does it limit local and state flexibility to be responsive to community needs?

Counties are the front-line providers of basic social services; we seek to achieve an appropriate blend of local administrative flexibility and federal and state standards to provide a basic level of assistance for children and families.

## **SELF-SUFFICIENCY PROGRAMS**

Self-sufficiency programs are meant to be a temporary safety net for families and individuals who are experiencing unemployment, underemployment or have other barriers to self-sufficiency.

- A. Block Grants for Entitlement Programs:** NACo believes that the federal government should be responsible for adequately funding its entitlement programs. NACo opposes mandatory block grants and funding caps for federal assistance programs such as SNAP, Medicaid, and Foster Care. Capped block grants in these programs would shift the full cost of program growth and inflation to states and counties. NACo also opposes reductions in administrative funding for these programs that would result in unfunded mandates to counties and states.
- B. Block Grants for Categorical Programs:** NACo recognizes strong county government as an essential component and partner in the effective operation of national-state-local human services programs. Local governments are often best equipped to administer human services programs, and therefore must be assured an effective role in the development and implementation of federal programs.

NACo supports consolidating existing categorical grant programs in order to reduce complexity and improve flexibility and program delivery at the local level. Human services block grants must follow the following principles:

- Programs should be controlled by elected county officials responsible directly to the taxpayers.
  - Federal block grant proposals must be developed in close consultation with county officials.
  - Federal block grant funds for health and social services programs should be allocated directly to counties where an existing service delivery system is in place.
  - States must be required to plan jointly with county officials and to publish program plans for review and comments.
  - Where direct funding is not available, states must be required to pass through maximum dollars to counties.
  - Reasonable transition time should be allowed to move from categorical grants to block grants, including sufficient time to adjust county and state laws, budgets, and administrative procedures.
  - There must be an absolute reduction in federal mandates and regulations, and increased flexibility and simplicity in program administration.
  - No matching funds should be required of local governments.
  - No maintenance of effort should be required. State and local government laws and procedures governing spending should apply to block grants.
- C. Temporary Assistance for Needy Families (TANF):** The success of TANF depends on counties' flexibility to target local needs and support participants' work activities. Without that flexibility and the funding to implement it, the working families who are struggling toward self-sufficiency will lose supportive services and many will fall back on cash assistance. Welfare reform is an ongoing process of supporting working families in gaining self-sufficiency, not a one-time removal of families from the welfare rolls.

Many TANF participants who find work continue to need assistance with job retention, transportation, counseling and other support services such as child care and health care. Additionally, TANF funding must be able to react quickly to economic downturns and other emerging issues by having unallocated reserves that states can tap quickly.

1. **Funding:** TANF should have an annual inflation increase, including the supplemental grants for high-growth states. The TANF state entitlement block grant structure should be maintained without carve-outs or set-asides. The funding level for the TANF Contingency Fund should be increased. NACo supports new funding for research and dissemination of information on family formation.
2. **Flexibility:** States, counties, and Native American tribes should be permitted to spend carryover funds on any allowable use of TANF. This would include transferring funds to the CCDBG and SSBG.
3. **Participation Requirements and Work Activities:** NACo opposes arbitrary and counterproductive work and participation requirements and supports a strong county role in mutually negotiated outcome measures in which states are judged by their progress toward achieving these goals. NACo supports greater flexibility in the TANF work requirements in order to allow counties and states to meet the individual needs of their caseloads. These include, but are not limited to, the following:
  - A 50 percent work participation rate for two-parent and single parent families;
  - Thirty hours of work a week for two-parent and single parent families;
  - At the very least, the 12 activities included in the original TANF law;
  - Allowing individuals who are participating in substance abuse or mental health treatment, and domestic violence services to count those activities as work;
  - Continuing to exclude victims of domestic abuse and mothers with young children from the participation requirement;
  - At least twelve weeks of thirty hours per week a year for job search and job readiness activities;
  - Twenty-four months for vocational education to a higher percentage of the caseload;
  - Allowing more than 10 hours a week of basic skills and education training to count as work activities and allowing these hours to count toward work participation rates;
  - Removing teen parents from the 20 percent vocational education limit;
  - Exempting relatives who are caring for a child who would otherwise be in foster care from the work requirements and the time limit;
  - Allowing vocational education and high school equivalency programs to count towards the work participation rates;
  - Exempting adults who are the primary caregivers of a disabled family member from the work requirements; and
  - Allowing a parent providing child care in a two-parent family to count toward the work requirement.
4. **Time Limits:** For time-limited assistance to be successful, it must be accompanied by adequate federal and state funding for a wide continuum of supportive services that will help families move toward self-sufficiency. NACo supports preserving and increasing state flexibility in administering the federal time limits. This includes allowing states to discount months in which the recipient participates in work and/or specific work activities, including substance-use disorder treatment, behavioral health and domestic violence services in compliance with their employability plan; and eliminating child care, transportation, and housing from the definition of assistance.

NACo supports the twenty percent hardship exemption and the family violence exemption from the TANF time limit. Victims of sexual assault should be added to this exemption. States should be allowed to lift the lifetime ban on TANF eligibility for individual family members with drug felony convictions.

5. **Maintenance of Effort:** Current law is unclear on the ability of states to supplant existing funding with federal TANF funds, and under what circumstances a state may use federal funds to increase existing state-funded programs. Once a state or county spends its Maintenance of Effort (MoE) for a given fiscal year, it should be able to draw down its full allocation of federal TANF dollars for that year at any time. Unspent funds should not be applied against future allocations. Obligated funds should be treated and

reported as spent. The supplantation provisions must be clarified so that replacement of state dollars with federal dollars is strictly prohibited, but allow using federal dollars to increase the coverage or availability of a state program above current state spending levels.

6. **Teen Parents:** Teen parents in particular are at great risk of long-term welfare dependence. Teen parents should be required to pursue their high school education or GED. Alternative education should be provided when needed and waivers should be developed for special circumstances. The education system should make the necessary provisions to provide needed child care, counseling and other supportive services for teen parents. NACo supports alternatives that would encourage teenage parents to live with their parents or other responsible adults, and fund enhanced case management and independent living arrangements.
  7. **Program Coordination:** An integrated workforce development system should be encouraged by giving counties greater flexibility to coordinate programs and blend funds.
  8. **Family Promotion:** TANF already has the flexibility for states to promote marriage and family formation. Any new incentive programs aimed at marriage promotion must be funded with new money, and should not be carved out of TANF. NACo opposes penalties associated with marriage promotion outcomes. NACo supports funding and disseminating further research on these subjects.
  9. **Partial Credit:** Many families, particularly those with special needs, struggle to meet their work participation requirements. Under current law, no credit is given for these families, even if they fall short by as little as one hour. Counties and states should be allowed to apply partial credit for the hours that these families participate.
  10. **Phasing-Out Benefits:** A single dollar increase in TANF's Income Reporting Threshold can make a family ineligible for benefits and can serve as a disincentive to work. Counties and states should be allowed to gradually phase-out cash benefits as the family's income increases.
- D. Supplemental Nutrition Assistance Program (SNAP):** The SNAP program provides nutrition assistance funding to low income families and individuals to support better support healthy and adequate eating habits. SNAP is critical to struggling families and has proven to be one of the most countercyclical federal programs because benefits can reach families quickly during economic downturns as well as natural disasters. The program serves diverse populations with a wide range of needs, and is administered by counties in a variety of states across the country. NACo supports moving a SNAP reauthorization in conjunction with a reauthorization of the Farm Bill.
1. **Program and Funding Structure:** NACo supports the current SNAP entitlement program and funding structure, including maintaining the 50 percent federal administrative match for states given that counties contribute to the administrative costs of the SNAP program in many county-administered states. SNAP should not be block granted, since such a policy change would place additional strain on both recipients and state and local governments. As the introductory statement states, SNAP is indeed a very responsive countercyclical program, as evidenced by the large increases in SNAP participants during the great recession in the late 2000's and early 2010's. Block granting would seriously undermine that responsiveness, leaving struggling families with less access to food and further weakening the economy since SNAP families redeem their benefits quickly and locally. Moreover, counties would see shifts in costs to support those households if the already low benefit is reduced under a block grant.
  2. **Streamlining SNAP**
    - a. **Administratively and Across Programs:** NACo encourages Congress to increase the options available to state and local administrative bodies in streamlining applications and administrative

processes. Local social services departments see many individuals and families that are eligible for multiple programs, but requirements are often slightly different for each program, generating significant work for staff and applicants alike. All states should be allowed to seamlessly enroll Supplemental Security Income (SSI) participants in the SNAP program. In general, as additional programs are streamlined, barriers to entry for participants should be reduced, and Congress and states should not make the most restrictive elements of each program the qualifications required for approval.

- b. For Recipients:** Congress and the U.S. Department of Agriculture Food and Nutrition Service (FNS) should work to reduce “churn” – the rolling of recipients on and off of the program – in the SNAP program, which can be a burden for recipients and administrators alike. Administration and application processes should be simplified to allow individuals reapplying for benefits to enter a streamlined process, reducing the time between application and receiving benefits while also reducing administrative costs.
- 3. Importance to Children:** Proper nutrition is crucial to high quality early childhood development goals and ensures children are mentally and physically prepared to learn when entering school. SNAP benefits for families should be at an adequate level so that all children have healthy diets.
- 4. Work Requirements and Time Limits:** NACo opposes arbitrary and counterproductive work and participation requirements and supports a strong county role in mutually negotiated outcome measures in which states are judged by their progress toward achieving agreed upon goals. NACo supports greater flexibility in the SNAP work requirements in order to allow counties and states to meet the individual needs of their caseloads.
  - a. SNAP Employment and Training (SNAP E&T) Program:** NACo supports enabling individuals to find and secure long-term employment and encourages Congress to acknowledge the reality that for time-limited assistance to be successful, it must be accompanied by adequate federal and state funding for a wide range of supportive services. The SNAP E&T program should receive more realistic funding levels from the federal government to ensure states and counties have the proper resources to assist individuals in finding work and remaining employed, including increasing the reimbursement rate, since SNAP E&T is an employment program. SNAP E&T should also be further integrated with existing workforce programs at the federal, state and local level, including local workforce development boards.
  - b. Able-Bodied Adults Without Dependents (ABAWDs):** In addition to the increased reimbursement rates for employment programs, NACo supports lengthening the time limit for ABAWDs and making the work requirements more flexible. Often, rapid attachment employment programs are short term, and individuals who find work do not remain employed because they have not developed the required skills. Allowing for increased training and an extended time limit would make employment goals more realistic. Additionally, NACo supports a tax incentive for employers who hire ABAWD SNAP participants for 20 hours or more each month, which could be increased based on the number of ABAWD participants hired. NACo also supports allowing counties in county-administered states to apply for a waiver for the ABAWD time limits if the state does not apply for a state-wide or partial waiver.
- 5. Disqualifications:** Lifetime disqualification from the SNAP program can have a lasting effect not just on the individual, but also on his or her family. NACo supports additional flexibility in disqualification determinations for states and local governments. NACo also supports lifting the lifetime ban on individuals with felony drug convictions in all states.

6. **Phasing-out of benefits:** Recipients of federal benefits programs often face a financial “cliff” as they gain employment – the boundary line at which point individuals or families lose benefits given their rise in income. NACo urges Congress to consider gradual phase outs of certain programs, including SNAP, to ease the transition from benefits to income, especially for families.
  7. **Rural Solutions:** NACo urges Congress and the Food and Nutrition Service to pursue solutions that address the specific obstacles rural communities face in ensuring access to food and healthy eating habits in rural areas, which often lack access to healthy food options. States with large rural populations and rural counties should be afforded additional flexibility in the administration of the SNAP program to help combat these challenges.
  8. **Use of Technology:** Among federal benefits programs, SNAP is already a leader in innovation and simplification of benefits, including the use of SNAP EBT cards. The federal government should continue to play a leading role in developing technology that makes program administration more seamless. By pioneering advances at the federal level, the program would be streamlined in states and local jurisdictions across the country.
  9. **Program Integrity:** NACo supports the goals of maintaining low levels of fraud and error rates within the SNAP program. Counties believe that a federal commitment to streamlining the program, increased technological advances, and additional flexibility to eliminate systemic program issues (including program churn) will help achieve this goal.
- E. **Supplemental Security Income (SSI):** SSI benefits and resource limits have not kept pace with inflation. A significant number of persons, including the homeless, who are potentially eligible for the program, do not participate. Congress and the administration should:
- Consider the impact that changes to SSI will have on county general assistance and indigent health care programs;
  - Provide benefits to individuals who receive care in county-owned residential facilities;
  - Reevaluate payment levels to ensure SSI recipients are provided with an adequate standard of living;
  - Reevaluate the asset limit to reflect inflation;
  - Simplify and expedite the application and eligibility process; and
  - Fully fund and expand SSI outreach programs.
- F. **Earned Income Tax Credit:** The Earned Income Tax Credit (EITC) has significantly boosted the incomes of low-income working families. According to Census Bureau data, the EITC helps move more children out of poverty than any other program. NACo supports changes to the EITC structure that increase the number of eligible families and provide higher benefit amounts.

## CHILDREN’S SERVICES

- A. **Early Childhood Education and Development:** The importance of the early years in child development is well documented. Quality prenatal services, health care, nutrition, and pre-school education are essential to the healthy development of a child. Early intervention and prevention programs, particularly home visitation programs, produce numerous advantages. Children who participate in early childhood development programs record outstanding developmental progress and greater success in the future. Other advantages include early detection of health and learning problems, higher educational achievement, preventing juvenile delinquency, lower crime rates, greater parental involvement in school programs, and reduced teen pregnancy rates. Consequently, best practices demonstrate investment in early childhood development programs reduces the need for chronic health care services, utilization of child welfare programs, juvenile justice measures and public assistance. NACo supports federal initiatives to help counties develop and expand these voluntary early

childhood and parent education programs. They include:

- **Head Start/Early Head Start:** Congress should provide adequate funding for comprehensive programs such as Head Start/Early Head Start, to ensure that needed educational, nutritional, and social services are available to disadvantaged pre-school children, including children with disabilities. Early Head Start, in particular, deserves stronger support so that infants, toddlers and their caregivers can take advantage of the program's continuum of services at an earlier age.
- **Educational Coordination:** NACo supports strengthened coordination of state and federal pre-school programs with county agencies that provide related services to children and their families. NACo further supports coordination between child care programs and Head Start to allow for full-day, continuous care at a single location. Better coordination and follow-up with schools are needed to ensure that the gains made by Head Start are not lost in future years.
- **Nutrition and Food Support:** Adequate nutrition not only prevents serious health problems, but also helps children improve their ability to learn. The Supplemental Nutrition Assistance Program (SNAP) and the Feeding Program for Women, Infants, and Children (WIC) are valuable components of the continuum of services needed to ensure children's physical and mental development. NACo therefore opposes further cuts to SNAP and supports continued expansion of WIC.

**B. Child Welfare Services:** The child's natural family has the primary right and responsibility to provide each child a safe and nurturing environment. Society must provide the necessary services and supports to safeguard and enhance the ability of all families to fulfill this essential role. Failing this, it becomes society's responsibility to provide for expeditious, alternative arrangements that are permanent and meet the child's physical, mental, and emotional needs. The societal response works best when governments at all levels collaborate in their efforts to restore children and families to health and wholeness.

In many states child welfare, substance use disorder treatment, behavioral health and services to individuals with developmental delays/disabilities are administered by counties, yet the various systems fail to operate collaboratively. Consequently, children suffer. Children whose parents struggle with chemical dependencies also suffer from substance use disorder and health problems. States and counties often are able to provide treatment to only a fraction of these parents and children. Access to adequate and timely services is even more difficult to obtain for children and youth with co-occurring conditions such as developmental delays and disabilities. NACo supports funding for new partnerships among federal, state and local child welfare and substance use disorder agencies. NACo further supports increased federal funding for school and community-based behavioral health, developmental and substance use disorder and services for children and youth. Counties must be involved in the planning and implementation process and must be eligible for direct funding.

NACo believes that systems that protect abused and neglected children should be based on a continuum of care, including a broad array of preventive services. When out-of-home care is necessary, kinship placements must be thoroughly explored before a child is placed into foster care. Counties should be afforded flexibility in designing services that best meet the needs of their children and communities.

1. **Foster Care, Kinship Care, Guardianship and Adoption Assistance:** a variety of foster care situations should be available and sufficiently funded to provide for the differing needs of children. NACo strongly opposes block grants and/or funding caps in the federal Foster Care program. NACo strongly supports the following:
  - Modernizing the eligibility determination system by linking federal foster care eligibility from the 1996 Aid to Families with Dependent Children (AFDC) income eligibility standards and developing a financing system that responds to a child's imminent risk of abuse or neglect;
  - Acknowledging the role that counties play in the foster care and child welfare system by consulting county officials in the development and implementation of legislation at the federal and state level;

- Enhancing county and state flexibility to provide supportive services for children and their families, including preventing unnecessary removal from the home and enhancing outcomes for children;
- Using Title IV-E funds for subsidized kinship guardianship and kinship post-guardianship services both prospectively and retroactively;
- Allowing Medicaid to cover more than life threatening care for dependent, abused, and neglected undocumented children in state custody. At a minimum, rehabilitation and targeted case management associated with abused or neglected children; and medical care required by federal policy pertaining to foster children should be covered;
- Allowing counties and states to include reunification and post-reunification services within the definition of IV-E Foster Care maintenance payments;
- Allowing IV-E Adoption Assistance funds to be used for post-adoption services for adopted children as well as subsidies;
- Government owned/operated residential treatment programs of more than 25 beds in size should be treated on an equal basis as similar not-for-profit and for-profit facilities, and should be eligible for Title IV-E reimbursement;
- Allowing states and counties to use IV-E funds to provide services for children placed in non-IV-E settings that prevent children from being placed in foster care;
- Allowing states and counties to use IV-E funds to provide prevention, pre-placement and early intervention services for children who are determined to be candidates for foster care.
- Allowing child welfare staff to conduct visits through computer technology, rather than in-person, with older youth (over 18 years of age) in extended foster care who are attending college out of state or connecting with relatives.

NACo strongly opposes block grants and/or funding caps in the federal Foster Care program because they would undermine counties' ability to ensure the health and safety of our most vulnerable children. If Congress adopts a capped allocation rather than continue to operate under an open-ended entitlement, NACo recommends the following basic principles:

- There must be adequate funding available through the duration of the grant;
  - Training and welfare information systems must remain separate from the flexibility proposal;
  - States should be required to maintain their current level of effort in child welfare;
  - Emergency funds should be flexible and broad enough to allow access by sub-state regions with sudden caseload increases;
  - Foster care children must remain categorically eligible for Medicaid;
  - States that opt to receive the capped allocation must be allowed to opt back into the open-ended entitlement at any time;
  - States should be able to negotiate the funding baseline for a block grant with the federal government;
  - States should be allowed to retain the current flexibility to negotiate waivers for localities; and
  - State associations of counties, in states where counties operate child welfare systems, must be consulted and state legislatures must have the right to approve a state's request to opt into the capped allocation system.
2. **Foster Youth:** Research shows that children aging out of foster care generally have poor outcomes. NACo urges a national "call to action" to raise awareness of the issues faced by children aging out of the foster care system. Additionally, NACo supports the following measures to improve outcomes for youth aging out of foster care:
- Enable disabled youth receiving federal foster care payments to immediately receive SSI benefits when leaving the foster care system;



- Enhance federal funding for workforce development, housing, health care, independent living programs, mental health, substance abuse services, and transitional services; and
- Coordinate and align resources between human services and workforce development to ensure completion of secondary education, gainful sustainable employment and/or post-secondary occupational training.

**3. Training and Administration of Foster Care, Kinship Care, Guardianship and a Adoption Assistance:**

Proper administrative support for these programs is essential to ensure children's continued well-being. NACo opposes any attempt to cap the Title IV-E administrative reimbursement for foster homes and social worker case management costs as an unwarranted cost shift to counties and states. States and counties also need to be given adequate time and resources to implement new requirements such as more frequent case reviews and automation of records and systems.

Staff training should be reimbursed at 75 percent regardless of the proportion of children in a state who are eligible for federal IV-E Foster Care maintenance and Adoption Assistance program payments.

Additionally, states should have the flexibility to use IV-E funds for cross-agency training of child welfare staff and other public and private agencies that work with these children, including substance abuse, mental health, education, juvenile justice, probation, and welfare agencies. Training funds should also be provided for foster parents, kinship care and guardianship care providers, and adoptive parents.

**4. Child Protective Services:** Federal policy must ensure local capacity and flexibility for immediate response to reports of child abuse and must provide a coordinated, comprehensive services systems that are designed to protect children and restore family functioning. NACo supports the development of an outcomes-based child protection system through a series of benchmarks developed at the local level that will monitor a community's progress based on its socio-economic needs and priorities.

**C. Child Care:** High-quality child care services are needed to ensure that we meet the developmental needs of children. Child care policies must recognize that the majority of mothers with young children are employed at least during a portion of the child's early years. Federal support for child care should be available to all public assistance recipients who need it while participating in employment, education, or training. Funding for the Child Care and Development Block Grant must be increased to meet the needs of eligible families, while maintaining the funding and flexibility in TANF.

Federally funded childcare should be available to working parents as they leave public assistance and should continue to be available on a fee scale based on their ability to pay. In the very least there should be enough federal child care funds to ensure that quality services are available to families with incomes of up to 225 percent of the federal poverty level and for families that leave TANF. Financial support should be made available for infant care, child care for children with special needs, children in foster care, and child care during non-traditional hours when needed.

Public child care resources such as licensing and monitoring of providers, information and referral, and assistance in selecting appropriate care, should be available to all, without regard to income or resources. State and local licensing laws should be carefully monitored to ensure adequacy of facilities and caretakers.

Employers should be given increased financial incentives to provide child care for their employees on site or as a benefit. The Dependent and Child Care Tax Credit should be made refundable.

**D. Child Support:** It is the right of every child to be supported by his or her parents. NACo supports the federal Title IV-D Child Support Enforcement program as a cost-effective means of ensuring that right. NACo supports providing federal financial incentives to states that opt to pass-through a higher percentage of child support collections to families on public assistance. NACo urges Congress to permanently restore the

ability of counties and states to draw additional federal match dollars from the reinvestment of child support incentive payments. County-administered child support programs should be allowed to retain the full application fee for cases where the custodial parent is not receiving cash assistance by identifying it as an administrative cost rather than as program income.

NACo supports removing the cap on the Child Support Incentive Fund and supports maintaining the 66 percent reimbursement rate for administrative costs and the 90 percent rate for genetic testing. NACo supports programs that assist non-custodial parents to be appropriately involved in the lives of their children financially and emotionally. Any new child support enforcement mandates must be accompanied by enhanced federal reimbursement.

NACo opposes private sector access to child support data and enforcement tools.

NACo supports legislation that creates a corrective action plan for states that have been unable to implement federal child support requirements; restricts penalties to corrective action plan non-compliance; and allows alternative systems configurations that provide expanded local flexibility for automated child support payments.

NACo supports legislation to streamline the international enforcement of child support obligations of parents who live outside the United States.

## **SERVICES TO OLDER AMERICANS**

Between 2011 and 2030 the 78 million individuals who were born between 1946 and 1964 will reach the age of 65. This means that the number of older adults in the U.S. will more than double. Not only will there be significantly higher numbers of the elderly, they will also be living longer. Individuals over the age of 85 are already the fastest growing sector of the population. At the same time, the number of working age people is only increasing by 20 percent and there will be fewer workers to support the retired population.

NACo supports a continuum of care for the elderly that provides supportive services to assist older persons remain active, productive and independent. These services would include adult day care, transportation, respite care, housing alternatives, caregiver training, support groups, in-home support services, family counseling, daily money management, public conservatorship and guardianship services, as well as chore services, personal care, skilled nursing care, and long-term care.

NACo supports federal policies that recognize the role and responsibilities of county government in assuring necessary and effective services for the elderly, including community-based and long-term care services. Federal policy should recognize that these costs have increased, and should support, facilitate and provide adequate federal funding for county implementation of these ever increasing costs and responsibilities.

**A. Older Americans Act:** NACo supports the Older Americans Act's goal of developing a coordinated program of services and opportunities for our older citizens. The Act should provide maximum flexibility for county governments to target resources to address the needs of the elderly in their community. Congress should fully fund the programs authorized under this legislation. Congress should expand and improve access to daily nutrition and meal services, respite care, home care services, adult day care, services to family caregivers, information and referral services, and research.

The changes in the aging population require better planning and targeting of health and human services programs. NACo urges the federal government to assist states and counties by funding in-depth needs assessments to determine the real needs of the elderly in their community and the adequacy of existing services and gaps in delivery.

- B. Long-Term Care:** County government has a long, established role as a provider, purchaser, administrator and/or contractor for long-term health care. Services should be provided in the least restrictive environment meeting the individual's needs.

Additional flexibility should be provided in Medicare, Medicaid, Veterans' Services, and other federal programs to encourage and enable the expansion of community-based care and assisted living facilities as a means of avoiding unnecessary institutional care.

Informal caregivers should be given support and provided incentives to encourage them to continue to provide support for those in need of services.

Rural counties have a higher percentage of senior citizens than urban counties, but they are less likely than their urban counterparts to have access to in-home and community-based services. NACo supports efforts to expand these programs in rural areas.

- C. Adult Protective Services:** Adult Protective Services (APS) vary widely among states and generally cover neglect, self-neglect and fiduciary and physical abuse of the elderly and disabled adults. In many states, counties have the responsibility for APS. Unfortunately, there are no clear data on the incidence of elder abuse and neglect nationwide although some studies suggest that almost 11 percent of people ages 60 and older faced some form of elder abuse and a 2009 report by the MetLife Mature Market Institute and the National Committee for the Prevention of Elder Abuse estimates that seniors lose at least \$2.5 billion each year to financial abuse. There is insufficient national information on the victims and perpetrators of abuse or evidence-based best practices. The Elder Justice Act (EJA) is the first federal program designed to combat abuse, neglect and exploitation of older adults. The program was authorized at \$777 million over four years but has yet to be funded. Counties in many states are responsible for adult protective services. NACo therefore supports full funding for the EJA and a federal research strategy.
- D. Social Security:** As the providers of last resort for health and social services, counties have an interest in preserving the benefits received by the nation's most vulnerable populations. Social Security benefits prevent poverty for people of all ages. NACo urges Congress, as it reforms Social Security, to protect the financial security of current and future Social Security beneficiaries, especially low-income individuals, the disabled and surviving spouses and children.

## **SOCIAL SERVICES**

There must be a human services program designed to achieve the full objectives of encouraging self-support, self-reliance, strengthening of family life and the protection of children and adults. The broad range of supportive social services needed to strengthen the community and family structure should emerge at the local level from a federal-state-county partnership that provides for maximum flexibility at the county level.

These services should be administered at the local level and adequately funded at the federal and state levels. States should be required to pass through to counties the majority of the state's share of federal funds. To ensure this pass-through, a limit should be placed on the amount states can retain for administrative or other purposes.

- A. Social Services Block Grant (SSBG):** SSBG is used by many counties for a variety of programs, such as adult protection, child care for children with special needs, child welfare, and child abuse prevention. In some cases, such as adult protection, this is the only source of fund for these services.

SSBG statutory funding has dwindled over the years from a level above \$3.1 billion to its current level of \$1.7 billion, which in reality is lower because it is affected by sequester cuts in 2013. NACo supports restoring the program to the highest level possible. Additionally, NACo strongly supports continued flexibility in the SSBG

program and maintaining the authority to transfer up to ten percent of TANF funds to SSBG. This flexibility enables states and counties to use the program to meet their specific local needs and goals.

- B. Services to Individuals with Disabilities:** Counties recognize that the objectives of encouraging self-support, self-reliance, strengthening of family life, and protective services apply equally to the physically, mentally, and developmentally disabled. NACo supports federal action that will promote these objectives by removing categorical restrictions that inhibit comprehensive planning and delivery of services to the disabled.

NACo supports federal action that increases incentives for deinstitutionalization and encourages and funds the expansion of community-based services, including the necessary individual and program financial support, to prevent reinstitutionalization. NACo supports equal opportunity for individuals with disabilities in all aspects of American life. Federal funding is necessary to supplement local efforts to achieve program and facility accessibility and equal employment opportunity.

- C. Community Action Agencies:** Through its boards involving the public sector, the private sector, and the community, the Community Services Block Grant (CSBG) represents a unique and effective partnership with counties, states, federal government and community organizations. NACo strongly supports full funding for CSBG.

- D. Domestic Violence:** Domestic violence is a major social problem not only because of its high incidence, but also because of its pervasive and self-perpetuating nature. The problem affects not only spouses, but also individuals in a wide range of living arrangements, including children, senior citizens, and those with developmental problems.

Children living in violent homes, whether victims or witnesses, frequently become abusive parents and/or mates themselves. Domestic violence is often associated with the development of other social and emotional problems. Treatment of the problem often involves temporary respite and permanent community resources to shelter victims. However, federal funding is insufficient.

The federal government should fund domestic violence programs that permit counties and communities to develop resources and services to protect family members and prevent family violence, improve staff training, and link programs in the health, behavioral health, self-sufficiency, child welfare, criminal justice, law enforcement, and social service systems for effective treatment and prevention of domestic violence.

- E. Energy Assistance for Low Income Persons:** NACo recognizes the need for a comprehensive energy assistance, weatherization, and conservation program with sufficient federal funding and incentives so that the cost burden does not fall on county government.

Eligibility criteria should include renters. It should not discriminate against single-person households and should not be limited to persons eligible for other federal programs. At the same time, every effort should be made to coordinate with other programs in order to simplify the application and eligibility program.

Congress has not always appropriated emergency or contingency funds for the Low Income Home Energy Assistance Program (LIHEAP). There needs to be a fund that addresses sudden situations such as fluctuations in energy costs, natural disasters and extreme weather conditions.

- F. Assistance for the Homeless:** NACo recognizes the need for a comprehensive national policy to end homelessness and poverty. A significant federal commitment is necessary to meet the growing need for services, including housing, mental health services, and substance abuse treatment to ensure that the burden for providing care and assistance to the homeless does not fall disproportionately upon counties. NACo endorses the federal strategic plan to prevent and end homelessness; especially the commitment for greater cooperation among federal agencies and the special attention being paid to veterans, families, and youth.

- G. Veterans' Services:** NACo strongly supports full funding to qualified veterans for educational, housing, and medical costs. County Veterans Service Officers, who are employed by counties, work to secure benefits for veterans by collaborating with the U.S. Department of Veterans Affairs (VA), state Departments of Veterans Affairs and Veterans Service Organizations. NACo endorses sustained federal financial support for CVSOs providing these benefits services. Benefits generated by CVSOs are not limited to individual veterans and often provide cost savings to local governments and revenue that goes back into the local economy. NACo endorses increased investments in solutions to veteran homelessness, and encourages both the Administration and Congress to continue to increase the resources targeted to end homelessness among veterans through programs such as the Veterans Affairs Supported Housing (HUD-VASH) program, Supportive Services for Veterans Families (SSVF), and the Grants and Per Diem program. NACo supports a process that is responsive to the needs of veterans and their families, provides appropriate information, and facilitates administrative services.
- H. National and Community Service:** The Corporation for National and Community Service (CNCS) and the programs it funds such as VISTA, Foster Grandparents, AmeriCorps and Senior Corps help youth and senior citizens become involved in the community and provide volunteer services to millions of Americans. NACo supports full funding for CNCS.

## **LEGAL IMMIGRANTS, MIGRANTS, REFUGEES AND UNDOCUMENTED INDIVIDUALS**

Legal immigrants, refugees, undocumented individuals, and others enter and remain in this country as a result of federal action or inaction. The heavy fiscal burden that is placed upon local governments is the direct result of national immigration policies or the lack of enforcement of immigration policies. It is imperative that be an ongoing consultation process on immigration issues with NACo and other national organizations representing state and local governments.

**A. Comprehensive Immigration Reform:** NACo urges Congress and the President to enact comprehensive immigration reform legislation that:

- Provides for uniform enforcement of all existing laws;
- Secures our borders;
- Includes a national strategy for coordination among federal, state, local and tribal authorities;
- Establishes a sensible and orderly guest worker program;
- Imposes no unfunded mandates on state and local governments;
- Includes no mandates on counties to enforce immigration laws;
- Preserves the eligibility of legal non-citizens for federally-funded health benefits and provides a sustainable funding stream to counties for their cost of providing health services to legal non-citizens who are denied federally-funded health benefits;
- Establishes an earned path to citizenship that includes registering, background checks, demonstrating employment, learning English and civics, paying back taxes and fees that may be required;
- Improves and simplifies the current legal immigration system; and
- Provides green cards for science, technology, engineering and mathematics students who have received a graduate degree from American universities.

**A. Services:** Counties traditionally provide health, self-sufficiency programs and social services to persons residing within their boundaries, regardless of their legal status. Since immigration is a federal responsibility, the full cost, including administrative costs, of any services or assistance to non-citizens should be paid by the federal government rather than by county and state governments.

The 1996 welfare reform law limited refugee eligibility for SSI to seven years. NACo strongly supports restoring full SSI eligibility to refugees.

In addition to reimbursing county governments for costs incurred in assisting legal immigrants, refugees, undocumented individuals, and others, the federal government should strengthen its enforcement efforts to control illegal immigration.

- C. Refugee Program:** Refugees should be resettled in a manner that minimizes their concentration into a few counties. When making decisions to admit new refugees into the country, the U.S. State Department should give advance notice of those decisions to the states and counties that are most likely to be affected by the refugee resettlement.

There should be a permanent federal refugee program with uniform policies for all refugee groups and with sufficient federal funds to provide assistance during resettlement. Refugee resettlement funding has deteriorated over the years from 36 months to eight months of assistance. Federal funding should continue at the 100 percent reimbursement level for financial assistance, medical care, social services, employment services, and education until refugees reach a reasonable level of self-sufficiency.

It is critical that funding formulas respond not just to the challenges that state and local governments face at the point of initial resettlement. Secondary migration needs to be addressed through accurate data and funding that follows the refugee.

The federal government should develop contingency plans, in consultation with state and local elected officials, for mass asylum situations in which the U.S. is the country of first asylum. The legal status and rights of applicants for asylum and their eligibility for federal assistance must be clear and consistent.

The federal government must increase its dialogue with and accountability to state and local governments. NACo opposes any proposal that would transfer funds needed by states and counties for refugee assistance to resettlement agencies without proper state and county consultation and agreement. States and counties should have the flexibility to use refugee employment services for hard to serve populations who have been in the U.S. more than five years.

- A. Unaccompanied Children Crossing the Border:** NACo calls on the Administration and Congress to ensure that adequate federal funds are appropriated to shelter and provide care, including medical assistance, to unaccompanied children crossing the border and to ensure that the costs of the care provided to these children are not transferred to counties.

## **EDUCATION**

Education is key to the success of our economy and our ability to attract businesses to our communities. Furthermore, our quality of life is directly related to a quality education in our schools.

Local education systems affect all segments of the community and are critical to the success of many programs operated by counties. Regardless of the specific funding arrangements between counties and school districts, they share a common tax base and are both faced with limited resources.

- A. Elementary and Secondary Education:** Although states have the primary responsibility for elementary and secondary education, it is in the national interest and merits continued federal financial support. NACo urges Congress to substantially amend the Elementary and Secondary Education Act to grant greater local flexibility in the use of student achievement measures, the design of interventions for schools not making Adequate Yearly Progress and to address the individual needs of students with disabilities and students of English as a Second Language. NACo strongly urges Congress to fully fund the law so that states and local education agencies (LEAs) can implement all aspects of the law. Congress should provide increased funding to assist local communities in meeting regulations designed to eliminate discrimination.

NACo supports the current method of disbursement of funds LEAs and does not support the use of vouchers and policies such as tuition tax credits that would provide an unfair competitive advantage to private schools and erode support for public schools.

Bullying and harassment interfere with students' ability to achieve higher academic standards and can lead to even greater school safety problems. NACo urges the federal government provide school districts with the tools and resources they need to ensure that all students feel safe within their schools.

NACo supports the development of partnerships between schools, counties, local organizations and state and federal partners to support children from military families.

1. **Health Services in Schools:** Medicaid program should reimburse states, local governments and LEAs for health and behavioral health services provided in schools. This reimbursement should include direct services such as medical appointments and therapies and administrative services such as outreach and care coordination activities.
2. **Impacted Areas:** Congress must recognize the burdens placed on communities that have a large number of federal employees and facilities and must continue to provide federal aid to meet the extra costs involved in educating the children of federal employees.
3. **Education for Children with Disabilities:** NACo supports the goal of available free public education to all children with disabilities. Congress must keep the federal commitment to ensure full funding for the Individuals with Disabilities Education Act so that states and LEAs can meet the law's requirements.
4. **After-School Programs:** County governments run a variety of programs such as after school day care, mentoring/tutoring and recreational programs. Programs such as the 21<sup>st</sup> Century Community Learning Centers should be available directly to counties.
5. **School Construction:** NACo supports efforts to establish federal incentives that will help state and local governments finance school repair, renovation, modernization, and construction projects and facilitate the development of community services for children and families in school buildings.

**B. Adult, Career and Technical Education:** The federal government should place increased emphasis on the promotion of career technical programs across the secondary and post-secondary educational spectrum. These programs should respond to the needs of the local economy and should be coordinated with local self-sufficiency and job training programs. Congress should provide adequate funding for adult education, including English as a Second Language programs.

**C. Higher Education and Financial Aid:** According to the American Association of Community Colleges, there are 986 public community colleges nationwide and local funds provide 17 percent of their revenues. Additionally, several local governments fund four-year colleges. Pell Grants play a significant role in community college financial aid due to their lower tuition and higher percentage of low-income students. NACo therefore believes that Pell Grants and federally backed student loan programs are vital if this nation is to preserve equal educational opportunity and receive the benefit of the fully developed talents of the younger generation. Loans and grants should be based on economic need and require reasonable levels of self-help.

NACo also supports veterans' and their dependents' utilization of GI Bill education benefits and policies to assist them in accessing courses to obtain a degree. Additionally, NACo supports continued funding for veterans' vocational rehabilitation and apprenticeship opportunities.

**D. Science, Technology, Engineering and Mathematics (STEM) Education:** STEM-related jobs are expected to grow by 17 percent over the next decade, with 60 percent of those jobs requiring college degrees or higher, yet the U.S. is not attracting enough students into those fields. NACo strongly supports efforts to improve STEM

education, including health sciences, at all levels of the educational continuum. These efforts should include attracting more STEM teachers to rural elementary and secondary schools and encouraging groups that are underrepresented in the field to pursue STEM education, particularly women, African Americans and Latinos.

## **HUMAN SERVICES AND EDUCATION RESOLUTIONS**

### **Resolution on Early Childhood Development**

**Issue:** Increased funding for early childhood development

**Adopted Policy:** The National Association of Counties (NACo) supports legislation to increase investments in high quality early childhood development, including greater coordination among pre-school programs in schools and county run programs such as home visitation, child wellness, Head Start, Early Head Start and high quality childcare. Additionally, NACo supports legislation to fully fund early intervention entitlements through the Office of Special Education programs.

**Adopted | July 16, 2018**

### **Resolution Supporting Two-Generation Efforts to Reduce Poverty**

**Issue:** Poverty is a national problem and requires a national solution. In order to combat the harmful impacts of intergenerational poverty, federal, state and local partners should promote new methods of addressing these issues.

**Adopted Policy:** The National Association of Counties (NACo) encourages the federal government to pursue policies that support and enable state and local jurisdictions to coordinate a two-generation approach to combat poverty. Federal efforts to reform public assistance must recognize that poverty is influenced by national economic factors that are not within the control of local or state governments, and that local and state governments are best positioned to help their citizens when federal programs are flexible and support all generations within a family.

**Adopted | July 16, 2018**

### **Resolution to Enact the DREAM Act or Similar Legislation**

**Issue:** The National Association of Counties (NACo) should support the Development, Relief, and Education for Alien Minors (DREAM) Act or similar legislation.

**Adopted Policy:** The National Association of Counties (NACo) calls upon Congress and the president to enact the DREAM Act or similar legislation that, without imposing costs on counties, would allow certain undocumented immigrants who entered the country as children to attain legal status if they pass background checks, demonstrate good moral character and meet education requirements.

**Adopted | July 16, 2018**



## **Resolution to Fully Fund and Update the Temporary Assistance for Needy Families (TANF) Program**

**Issue:** The Temporary Assistance for Needy Families (TANF) program expires at the end of the fiscal year. The House Ways and Means Committee has adopted a partisan, five-year reauthorization entitled the Jobs and Opportunity with Benefits and Services (JOBS) for Success Act (H.R. 5861).

**Adopted Policy:** The National Association of Counties (NACo) supports a reauthorization of the Temporary Assistance for Needy Families (TANF) program to provide greater state and county flexibility to create and provide services that support families and help move them off welfare, including allowing more flexibility in TANF program design such as allowing higher education to count as work; realistic time limits on education; and allowing states to use TANF funds to support post-secondary educational expenses. NACo supports congressional efforts to measure client outcomes instead of administrative processes, but is concerned that Workforce Innovations and Opportunity Act (WIOA) metrics may not be the best benchmarks to determine programmatic success. NACo urges Congress to, at a minimum, retain and enhance state flexibility to use TANF funds for subsidized employment. Given the demonstrated success of TANF subsidized employment programs, NACo urges Congress to increase funding for those programs but not at the expense of existing funding for the TANF block grant or contingency fund. Given that Congress has not increased the \$16.5 billion TANF program since its enactment in 1996, NACo urges Congress to ensure that reauthorization includes a provision increasing TANF funds annually at an amount commensurate with the rate of inflation. NACo supports continuing the ability of states to transfer up to ten percent of their TANF block grant to the Social Services Block Grant in order to address locally-identified needs, such as responding to the opioid crisis. NACo further supports continued ability of states to directly utilize TANF block grant funds for child care expenses for families. Additionally, NACo urges transparency regarding the use of TANF block grant and state “maintenance of effort” (MOE) funds.

**Adopted | July 16, 2018**

## **Resolution to Oppose the Proposed Changes to the Supplemental Nutrition Assistance Program (SNAP) in the House Farm Bill**

**Issue:** The House Agriculture and Nutrition Act of 2018 (H.R. 2) would make sweeping changes to the Supplemental Nutrition Assistance Program (SNAP) by increasing work requirements and penalties for non-compliance, as well as restricting state and county administrative flexibility in determining benefit eligibility. SNAP is a critical, often short-term support for families and has proven to be one of the most effective countercyclical federal programs because benefits reach families quickly during economic downturns as well as natural disasters.

**Adopted Policy:** The National Association of Counties (NACo) opposes provisions in the Agriculture and Nutrition Act (H.R. 2) that would terminate Supplemental Nutrition Assistance Program (SNAP) benefits for families currently eligible for the program and increase county administrative complexity in operating SNAP.

**Adopted | July 16, 2018**

## **Resolution Urging Congress and the Administration to Maintain County Child Welfare Flexibility and Funding**

**Issue:** In February 2018, Congress passed and President Trump signed into law the Family First Prevention Services Act (FFPSA). The new law provides new federal entitlement funding for optional foster care prevention services meeting stringent best practice benchmarks and will create new federal requirements relating to congregate (group home) care that would reduce federal IV-E reimbursement and shift costs to states and counties. The FFPSA did not extend federal IV-E waivers slated to expire on September 30, 2019.

**Adopted Policy:** The National Association of Counties (NACo) urges the Trump Administration to provide administrative flexibility in the Family First Prevention Services Act (FFPSA) to minimize the anticipated cost-shifts to states and counties that will occur by denying FFPSA Title IV-E eligibility to children who would remain eligible for state or county-funded foster care and adoption assistance. Congress should also provide states and counties with sufficient flexibility to serve and protect abused and neglected children as done currently under some state laws. NACo further urges that Congress amend and/or the administration mitigate the law's proscriptive provisions intended to reduce the use of congregate care so that states and counties already proceeding with similar efforts may continue to do so. Additionally, Congress should extend federal IV-E waiver authority through September 30, 2024 unless comprehensive child welfare finance reform that reflects NACo's priorities is passed and implemented before waivers expire.

**Adopted | July 16, 2018**

## **Resolution to Address Sexual Abuse in Families**

**Issue:** Resources and education to prevent sexual abuse in families

**Adopted Policy:** The National Association of Counties (NACo) urges the U.S. Department of Health and Human Services' (HHS) Office of the Administration for Children and Families' (ACF) Children's Bureau to focus prevention money through, but not limited to, the Family First Prevention Services Act (FFPSA) for victims of sexual abuse, including commercially sexually exploited children, with evidence-based trauma informed care. NACo further supports programs, research and monitoring systems that prevent child abuse and neglect in families while ensuring that children who are victims receive treatment and care.

**Adopted | July 16, 2018**

## **Resolution in Support of Strengthening Military and Veteran Caregiver Programs**

**Issue:** Support for strengthening military and veteran caregiver programs

**Adopted Policy:** The National Association of Counties (NACo) urges Congress to pass legislation that would strengthen services, including caregiver, financial planning and legal services, under the U.S. Department of Veterans Affairs' (VA) military and caregiver programs. Additionally, NACo supports the enhancement of special compensation for members of the Armed Forces or veterans who require assistance in everyday life.

**Adopted | July 16, 2018**

## **INTERIM POLICY RESOLUTIONS**

### **Resolution to Minimize the Negative Impact of Immigration Enforcement on Families and Children**

**Issue:** The need to carry out enforcement of immigration law in a manner that does not increase reliance on local social safety-net services or increase administrative costs for counties.

**Adopted Policy:** The National Association of Counties (NACo) urges the federal government to carry out its enforcement of immigration law in a manner that minimizes negative impacts on families and children and does not increase reliance on local social safety-net services or create new demands and administrative costs for counties.

**Adopted | March 4, 2019**

### **Resolution to Oppose the Proposed Rule Further Restricting the Ability of States to Request Waivers to Modify Supplemental Nutrition Assistance Program (SNAP) Work Requirements for Single Individuals**

**Issue:** The U.S. Department of Agriculture (USDA) has issued a notice of proposed rulemaking (NPRM) that would change the criteria and calculations of state waivers for the Supplemental Nutrition Assistance Program (SNAP) program.

**Adopted Policy:** The National Association of County (NACo) urges USDA to modify substantially the proposed rule on SNAP waivers. NACo supports the continued ability of states to request statewide waivers, as well as the current flexibility states have when grouping counties subject to a waiver. NACo supports greater flexibility to allow able-bodied adults without dependents (ABAWDs) to receive SNAP benefits as they find jobs, including increasing federal support and administrative flexibility in administering SNAP Employment and Training (E&T) programs. Finally, NACo supports a change in the waiver process to allow counties to apply for an ABAWD waiver if a state does not apply for a state-wide or partial waiver.

**Adopted | March 4, 2019**

### **Resolution to Maintain Current Levels of Legal Migration**

**Issue:** The health of our economy and communities and our economic growth as counties depends on a robust legal immigration system.

**Adopted Policy:** The National Association of Counties (NACo) supports legislative or regulatory proposals that at least maintain current statutory legal immigration levels and opposes any efforts that would significantly reduce legal immigration to the United States.

**Adopted | March 4, 2018**