



November 18, 2019

The Honorable Chuck Grassley
United States Senate
135 Hart Senate Office Building
Washington, DC 20510

The Honorable Ron Wyden
United States Senate
221 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Danny Davis
United States House of Representatives
2159 Rayburn House Office Building
Washington, DC 20515

The Honorable Jackie Walorski
United States House of Representatives
419 Cannon House Office Building
Washington, DC 20515

Dear Chairman Grassley, Ranking Member Wyden, Chairman Davis and Ranking Member Walorski,

The National Association of Counties (NACo) and the 3,069 counties we represent thank you for your leadership in introducing the *Family First Transition Act* (S. 2777/H.R. 4980). We commend you for taking action to provide critical and flexible funding as we work to implement the child welfare reforms enacted under the [Family First Prevention Services Act](#) (FFPSA, PL 115-123).

Across the country, counties are on the front lines of delivering support services to prevent abuse and neglect of our nation's children. While most states operate child welfare systems, twelve states either delegate or share child welfare administration with county agencies. In these states, counties use Title IV-E waivers to support services meant to prevent abuse and neglect or encourage the placement of children in family foster care settings when appropriate. In fact, many counties utilizing Title IV-E waivers are leading the way in reducing the use of congregate care and preventing children and families from entering or reentering the foster care system.

Under FFPSA, counties may now use Title IV-E funds for child welfare and foster care prevention services. However, the legislation did not extend Title IV-E waiver authorities, limiting prevention service flexibility for states and counties currently reforming child welfare systems through these waivers. By providing FFPSA transition and two-year waiver funding, the *Family First Transition Act* will prevent funding losses that would critically disrupt child welfare services in states and counties shifting to the new foster care model.

Counties welcome the fact that beyond these additional resources, the *Family First Transition Act* creates a delayed phase-in for the "well-supported" requirement within FFPSA for prevention services, which will offer us important flexibility to proceed with existing, evidence-based foster care prevention programs. Together these changes to FFPSA will help counties ensure we are providing the possible outcomes for the children and families interacting with our child welfare systems.

We thank you for your ongoing leadership on this transformative improvement to our nation's child welfare system. As counties look to leverage these important new resources for our residents, the *Family First Transition Act* will be instrumental to successfully implementing the reforms under FFPSA.

If you have any questions, please contact NACo Associate Legislative Director Rachel Merker (rmerker@naco.org).

Sincerely,

A handwritten signature in black ink that reads "Matthew D. Chase". The signature is written in a cursive style with a large, prominent loop at the beginning of the first name.

Matthew D. Chase
Executive Director
National Association of Counties

CC: Members of the U.S. House Ways and Means Committee

CC: Members of the U.S. Senate Finance Committee

CC: Members of the Congressional Foster Youth Caucus