

14 January 2021

Dear Rep. Zulkosky & Committee Members of HSS,

Thank you for hosting the hearing on the bifurcation of the Office of Children Services (OCS) on Wednesday, January 13<sup>th</sup>. As the President/CEO of the Alaska Children's Trust, please accept this letter to be included with the testimony.

KIDS COUNT Alaska shows the number and rate of children who are confirmed by OCS as victims of abuse and neglect fluctuated over the last decade with the count of victims ranging from between 2,430 (2013) and 3,489 (2009) while the rate fluctuated between 13 and 19 per 100,000 over the past decade. In 2019, there were nearly 3,200 substantiated cases, with almost the same number of children in foster care. Children between the ages of birth and age 4 comprise the largest proportion of total child maltreatment case at 41 percent. Followed by ages 5 to 10 at 35 percent. Our most vulnerable children being harmed the most.

The most common form of maltreatment is neglect. Among children who were confirmed as victims of maltreatment in 2018, 77 percent were victims of neglect, 26 percent of emotional abuse, 16 percent physical abuse, 8 percent sexual abuse, and 3 percent medical neglect. These percentages add up to be greater than 100 percent because a child can be the subject of more than one maltreatment incident. And we know Alaska Natives represent over 50 percent of the total maltreatment cases and children in foster care.

The cost of child abuse and neglect is substantial. In a report, soon to be released by Alaska Children's Trust, we determined the overall cost to Alaska. Child abuse and neglect causes detrimental effects to victims that often last a lifetime. These effects not only diminish the health and quality of life of the child, but also impose costs on society through increased expenditures on health care, child welfare, criminal justice, education, as well as lost workforce productivity. Based on the number of unique victims of child abuse and neglect in Alaska in 2019 (3,139), the total cost of fatal and non-fatal child abuse and neglect was \$710 million.

Data shows Alaska has been faced with this brutal epidemic for over a decade. Child abuse and neglect has had a major negative impact on the lives of children and families, and Alaska's overall budget. As the statewide organization focused on the prevention of child abuse and neglect, ACT is happy to see the Department of Health & Social Services (DHSS) is exploring how to make OCS as effective and successful possible to address these alarming trends. However, we have concerns on how and what has been proposed by DHSS. Our concerns are:

# 100% Focus on Downstream

The work of OCS is tertiary prevention – focused on people who are have already been abused. A key factor that is impacting OCS's ability to be effective is the sheer volume of children and families that go through the system on an annual basis. The system cannot handle the volume, resulting in many of the issues DHSS uses to justify the bifurcation. Bifurcation will not change these numbers - it most likely will do the opposite.



To make OCS more effective, we need to reduce the number of children and families who enter the system. We need early intervention and upstream investments today.

Labeling one of the new divisions, "Early Intervention", and their role being focused on investigations, is an inaccurate title. True early intervention would allow us to reach children and families sooner and hopefully mitigate the need for OCS intervention, resulting in healthier children and major cost savings.

## Lack of Stakeholder Engagement

The Child Welfare System (i.e., OCS) is complex. To effectively and equitably restructure a system that is complex and has a major impact on children and families' lives, it is vital we include stakeholder voices. Of our knowledge, no stakeholders were consulted on the proposed bifurcation plan. Stakeholders have first-hand experience and understanding of not only the child welfare system, but more importantly, what upstream intervention(s) could have occurred to prevent OCS involvement. Stakeholders should include current and past children in foster care and families of the OCS system, tribal entities, partner organizations, and OCS frontline staff.

# **Creates Additional Barriers for Families**

Creating another department creates one more system a family needs to navigate. Families are already struggling to navigate the various systems within DHSS, let alone OCS. To add one more system may cause an additional barrier to families being successful to reunify with their children and exit the OCS system.

## Erodes Trust

One of the reasons shared by DHSS for the bifurcation is the lack of trust families have towards OCS. Trust is earned over time. When a family only receives support after they have been identified as a "bad parent" resulting in OCS intervention, the family's trust of the system is not surprisingly low. As a state, if we institute concrete, upstream supports for families, it will allow trust to developed early on.

# Lack of Data Utilization

The work of Dr. Jared Parrish, Senior Epidemiologist at DHSS, and his team have done a tremendous job of pulling state data together that outlines what puts a family at greatest risk of entering the OCS system. Other research shows the amount of family recidivism and the potential burden it places on OCS. It appears these sources of data are not being utilized in determining how best to restructure Alaska's child welfare system.

### **Poor Communication**

The proposed change to OCS is still extremely vague. It is positive to see DHSS have in-depth conversations with tribal partners. However, these same conversations have not occurred with their non-tribal entities. Almost all these partners heard about the proposed change through the "grapevine" versus DHSS or OCS. Most of us, like the legislators, have a ton of questions but cannot obtain answers. The longer people are left without answers, the quicker the already fragile relationships that exist between DHSS and the community will erode.



It is our hope this and the other testimony you received will encourage DHSS to alaska childred rethink how they are approaching the restructuring of OCS and incorporate the concerns and ideas they have received. Thank you for this opportunity to contribute to this important conversation.

Sincerely,

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Trevor J. Storrs President/CEO