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Public Hearing:
Performance Oversight Hearing
Office of the Ombudsperson for Children

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Introduction

Good morning, Chairperson Lewis George, and members of the Committee. My name is Leah Castelaz. I am a Policy Attorney at Children's Law Center and a resident of the District. Children's Law Center believes every child should grow up with a strong foundation of family, health and education and live in a world free from poverty, trauma, racism and other forms of oppression. Our more than 100 staff – together with DC children and families, community partners and pro bono attorneys – use the law to solve children's urgent problems today and improve the systems that will affect their lives tomorrow. Since our founding in 1996, we have reached more than 50,000 children and families directly and multiplied our impact by advocating for city-wide solutions that benefit hundreds of thousands more.

Thank you for the opportunity to testify today regarding the performance of the Office of the Ombudsperson for Children over the last year. Each year, Children's Law Center attorneys serve as guardians-ad-litem for several hundred children in foster care and protective supervision – over half of all children in the care and custody of the Child and Family Services Agency (CFSA). As a result, we see firsthand how children and families who are involved in the child welfare system struggle to achieve stability – often because CFSA and its sister agencies are unable to meet their needs. Our clients and their families frequently experience excessive delays to accessing appropriate behavioral

health services, face unmet educational needs, and struggle to find affordable, suitable housing.³

The Ombudsperson for Children is designed to play a critical role in addressing these on-going concerns by enabling the Council to exercise effective oversight of DC's child welfare system – a system that encompasses many agencies beyond just CFSA.⁴ The Office also receives resident complaints regarding their experiences with the child welfare system and seeks to efficiently and effectively resolve those complaints by investigating relevant agencies and providing targeted recommendations to solve ongoing day-to-day problems.⁵ Finally, the Ombudsperson is responsible for identifying trends and systemic issues impacting children in care and providing recommendations to better the system as a whole and improve interagency communication and coordination.⁶

Over the past year, the Office has continued the process of establishing itself – with a focus on staffing, developing its infrastructure and operating procedures, and building relationships within the government and the community. Although the Office suffered some setbacks in this first full year of operations, the Office made significant progress in carving out its role as a critical resource for CFSA-involved children and families. Our testimony today will address: (1) the Office's accomplishments over the past year and the support needed to ensure continued success; and (2) the Office's second annual report, which gives us some insight into how to improve coordination and delivery of services

for CFSA-involved children and families and serves as a solid foundation from which to expand future reporting by the Office.

Despite Missing a Critical Role on the Leadership Team, the Office of the Ombudsperson for Children Saw Many Accomplishments in its First Full Year

Fiscal Year 2023 was the first full fiscal year for the Office of the Ombudsperson for Children. Although we were disappointed by the early departure of the inaugural Ombudsperson in March 2023, we appreciated her work to set up the Office including hiring of then Chief Deputy Ombudsperson, Petrina Jones-Jesz, and the Deputy CFSA Ombudsperson, William Thomas. Ms. Jones-Jesz stepped into the leadership role of the Acting Ombudsperson for Children at a time of great activity including community engagement efforts, going live with the complaint form, establishing permanent, physical office space, and hiring the two Ombuds analyst positions.

We would like to highlight a few key areas of success the Office has had over the last year. First, the Office made significant efforts to do outreach to the community to share the mission and goals of the Office. The Office met with different organizations across the District including a presentation to Children's Law Center guardian-ad litem program. Being community facing is a critical component to help DC residents see the Office as a tool to help resolve concerns and issues arising in the child welfare system.

Second, we applaud the strong working relationship the Office has developed with agencies like CFSA and the Department of Youth Services (DYRS).8 The work of the Ombudsperson to resolve complaints and provide solutions must be done in partnership

with DC government agencies. The Ombudsperson sits in a position that allows the Office to understand governmental agencies' roles in the lives of DC families and children, address interagency coordination, and build relationships with all agencies involved in the District's child welfare system.

Finally, over the last year the Office has built its internal capacity to move forward the day-to-day operations. This has included working with the Office of the Chief Technology Officer (OCTO) to develop the complaints form, website, and administrative database for the Office. Recognizing a need for multiple ways for residents to contact the Office, the Ombudsperson has established permanent Offices near a metro station, setup an office within CFSA, and ensured a working complaint form, email, and phone for residents to utilize. Finally, the Office hired two Ombuds analyst positions to help investigate complaints and move forward solutions for DC children and families. 11

We applaud the work done thus far, and we are very glad that the role of the Ombudsperson for Children is now permanently filled by Ms. Jones-Jesz. ¹² We now ask the Office as well as this Committee to turn to hiring the now vacant position of the Chief Deputy Ombudsperson for Children. Without securing a full leadership team in the Office, the roles and duties defined in the enacting legislation cannot be meaningfully fulfilled. ¹³

We, therefore, appreciate that the Office has been transparent in needing more support to meet all their legislative mandates and their own Office's goals. Moving

forward with hiring a new Chief Deputy Ombudsperson sooner rather than later will ensure the Office can continue to build on its already significant work and continue to focus on more systemic efforts.

The Ombudsperson will need to continue to hire to increase its capacity to support child welfare involved children and families. During FY2023, the Office hired two Ombuds analysts to begin to support with complaints, investigations, and recommendations. Additionally, in FY2024 the Office received additional funding from the Committee on Facilities and Family Services to hire a legal analyst. Unfortunately, in FY2024 one of the Ombuds analyst has left their position. Therefore, over the course of this year the Office will need to hire for three positions. These positions all play a critical role in the work of the Ombudsperson especially as the Office moves into its second full year and becomes more established in its practices, procedures, mission, and vision.

The Ombudsperson for Children Annual Report Provides Important Insights into the District's Child Welfare System

Per the enacting legislation, the Office is required to provide an annual report to the Council to assist with effective oversight of the child welfare system. ¹⁶ The report builds on the reporting the Center for the Study of Social Policy ("CSSP") which used to perform as the court-appointed monitor for *LaShawn A. v. Bowser* ("LaShawn") – a federal class action lawsuit filed in 1989 on behalf of abused and neglected children in the District of Columbia. ¹⁷ For years, CSSP issued regular public reports on the agency's

performance on an array of issues including child protective services investigations, the appropriateness of foster care placements, and provisions on health care access.¹⁸

The second annual report from the Office of the Ombudsperson for Children examines similar issues as well as explores new areas to ultimately understand how the District can improve the coordination and delivery of services to children in care. Specifically, the Ombudsperson report provides: (1) an overview of office implementation; (2) complaint operations and trend analysis; (3) CFSA-specific data on placement stability and access to behavioral health services for children and youth in care; (4) crossover youth data; and (5) summary of case recommendations and findings. These categories provide helpful insight into both the Office's operations and complaint process while also exploring CFSA and its sister agencies' data. The second annual report serves as a solid foundation from which to expand future reporting on the full child welfare system.

The Annual Report Gives Insight into the Office of the Ombudsperson for Children's Complaint Process Including Investigation Timeliness, Trends Analysis, and Recommendations

The report provides critical insight into how the Office is establishing itself in the first year and moving forward a significant piece of its work – fielding and resolving complaints from child welfare involved children and families. ¹⁹ Specifically, the report provides the number, general sources and origins of complaints, the nature of complaints made, the methods by which complaints were received, and the timeliness of closure. ²⁰ Complaints appear to be addressed in a timely manner. The policy for the

completion of cases is within 45 business days, and the average time for a completed case was 52 days in FY2023.²¹ While the average lags behind the Office's policy, we appreciate the thoroughness and care which the Office is taking to ensure a full investigation that results in solutions and recommendations to alleviate similar issues in the future.²²

The report's qualitative information regarding the nature of the complaints received reflect some of the same concerns Children's Law Center has for our own clients including placement, kin caregiver supports, and safety measures.²³ We understand from our own work how the concerns highlighted in the report can be persistent and challenging to address. We are, therefore, glad to hear the Office is leaving cases open if the recommendations submitted are not implemented.²⁴ Ensuring that there are immediate solutions as well as systemic reforms is a critical piece of the Office, and we appreciate their establishment of mechanisms to ensure this goal is met.

Although the selected example cases and recommendations included in the report are instructive, it may be more helpful for future reports to include all cases with recommendations. For example, the Washington State Office of the Family and Children's Ombuds reports provide summaries of their findings for each complaint that culminated in adverse findings both in ongoing and past actions by the agency or agencies involved in the child welfare system.²⁵

Additionally, it may be helpful to explore recommendations that the Ombudsperson has made to other agencies. Currently, the case examples reported are focused on CFSA's role and provide recommendations for improvement to CFSA practice and procedure. However, there may be cases where another agency is better suited to help a family. As the Office continues to build relationships and grow its work, it will be helpful to understand where other agencies should and could intervene and support a child welfare-involved family. We, however, are encouraged by the Office's progress over the past year and hope that outreach to other government agencies will grow and so will the recommendations across agencies.

Deeper Analysis and Recommendations for Systemic Improvements Should Be the Focus of Future Reports

The annual report also provides some important distilled data from CFSA, specifically the report looks at: (1) placement stability; (2) hospitalizations and placements in residential treatment facilities; and (3) access to behavioral health services for both children and families. ²⁶ All data collected by the Office is critical for continued oversight and monitoring of the child welfare system as a whole. We would, however, like to see future reports take the data analysis further towards identifying system issues and potential solutions.

For placement stability the Office helpfully reported the FY2023 number of placements moves for children in care.²⁷ Of the 588 placement moves reported by the Office for FY2023, 372 moves were considered disruptions.²⁸ The Office also shared a

list of reasons for disruptions.²⁹ The report, however, did not provide the number of children that experience each type of disruption, identify the specific types of placements (i.e., specialized placements like professional resource parents), or provide specific case details that would help to better understand the needs of children and youth who do disrupt from a placement. Disrupting from a placement is destabilizing and has been found to lead to delayed permanency, academic difficulties, and challenges developing meaningful attachments.³⁰ We, therefore, need to understand at a more granular level why disruptions happen and what investments can be made to end further disruptions for foster children and youth and help them to achieve placement stability.

As for both children in care as well as in-home cases, the data reported by the Ombudsperson provides a high-level look into how children, youth, and families are being connected with behavioral health services in the District. The report, however, does not expand on the data to show existing barriers to access. From our clients' own experiences, they frequently struggle to access some of the most basic behavioral health services our system should be able to provide them.³¹ Details on the barriers to referrals to services as well as actually receiving services would help paint a clearer picture of how child welfare-involved children, youth, and families access the public behavioral health system. Understanding more clearly the intersection between CFSA and DBH

behavioral health services is crucial for providing meaningful insight on the necessary interagency coordination to ensure timely access to appropriate services.

Good Progress was Made on Crossover Youth Data Collection, but Needs to be Expanded to Ensure it Captures the Entire Population

We appreciate the Office's significant efforts to collect information on crossover youth in the District given the obstacles including differing data collection process by CFSA and DYRS as well as confidentiality concerns of juvenile records which limited full data collection. We commend the Office's persistence and ongoing collaboration with both agencies to establish an entry level of data for the District's crossover youth population.³²

There are, however, ample opportunities for the report to expand on this data.

First, we would like to be clear that the data collected by the Office reflects only dualjacketed youth, which are a subsection of crossover youth. Dual-jacketed youth
represent youth who are simultaneously involved in both the juvenile legal system
(delinquency) and the child welfare system.³³ Crossover youth are children who
experience both the foster care system and the juvenile legal system even if at separate
times.³⁴ It is important that the proper population is captured in the data reporting as to
not erroneously overlook those youth who are not involved in the systems at the same
time but are still experiencing significant barriers to stability due to their current or
previous involvement in either the juvenile legal system or child welfare. Crossover

youth too often roll from one system to the next and face more barriers than youth involved in only one system.³⁵

The dual-jacketed data the Office was able to obtain is difficult to understand and lacks analysis of the experiences of the youth involved in both systems. We know from our own data that, over 40 percent of Children's Law Center crossover youth clients experienced placement issues or problems with receiving services from CFSA due to their juvenile or adult criminal legal system involvement. We, unfortunately, were not able to decipher this level of detail from the current reporting by the Office. We understand there were significant barriers to obtaining even the high-level data that is reported, and therefore, look forward to working with the Office and this Committee to remove those barriers and strengthen the crossover youth section of the report.

Conclusion

In the first full year the Ombudsperson has undertaken significant work to establish the office by making connections in both the community and with governmental partners to improve interagency coordination and navigation through the full child welfare system.³⁷ This role will continue to be important as CFSA continues its work to transform from the child welfare system into the child well-being system through its Keeping DC Families Together Initiative.³⁸ We support CFSA's underlying goal of prevention, but we must ensure there are proper guardrails to ensure child safety and

well-being. The Ombudsperson can help identify where those guardrails are working and where they are not.

Moreover, interagency coordination of DC social programs is needed now more than ever with the relaunched 211 Warmline. The 211 Warmline, which soft launched in October 2023, is a partnership between CFSA and the Office of Unified Communications (OUC) to serve as the District's unified social service resource and referral line.³⁹ The Ombudsperson can and should play a critical role during this year of learning about the 211 Warmline. In particular, the Ombudsperson annual report highlighted that at times families are reaching out to the Office for information and referral and not with a complaint.⁴⁰ In June 2023, the Office received eight complaints but in the same month received seven calls for information and referral.⁴¹ The Office has an additional insight of what District families may be looking for to be better connected with resources, services, and supports. We ask the Office to continue to share insight on calls about information and referral to help support CFSA in their development of the 211 Warmline.⁴²

The responsibility to ensure all children and family's needs are met with appropriate, timely, culturally congruent supports, services, and resources rests with all District's family-facing agencies – CFSA, DBH, the Department of Health Care Finance (DCHF), the Department of Health (DC Health), the Office of the Superintendent of Education (OSSE), District of Columbia Public Schools (DCPS), DYRS, the DC Housing Authority (DCHA), the Metropolitan Police Department (MPD), and the Department of

Human Services (DHS). The Office of the Ombudsperson will continue to play a critical role in assisting the Council with holding these agencies responsible and accountable. Thank you for the opportunity to testify today. I welcome any questions the Committee may have.

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¹ Children's Law Center attorneys represent children who are the subject of abuse and neglect cases in DC's Family Court. CLC attorneys fight to find safe homes and ensure that children receive the services they need to overcome the trauma that first brought them into the child welfare system. DC Children's Law Center, About Us, available at: https://www.childrenslawcenter.org/content/about-us. The term "protective supervision" means a legal status created by Division order in neglect cases whereby a minor is permitted to remain in his home under supervision, subject to return to the Division during the period of protective supervision. D.C. Code § 16-2301(19).

² Tami Weerasingha-Cote and Amber Rieke, testimony before the DC Council Committee on Facilities and Family Services, (December 6, 2023), available at: https://childrens-Law-Center-Testimony-for-Dec-6-2023-Hearing-on-B25-0500-and-Foster-Youth-Behavioral-Health_FINAL.pdf. See also Megan Conway, testimony before the DC Council Committee on Facilities and Family Services, (December 6, 2023), available at: https://childrenslawcenter.org/wp-content/uploads/2023/12/Megan-Conway-Testimony-for-Dec-6-2023-Hearing-on-Bill-B25-0500-and-Foster-Youth-Bheavioral-Health_FINAL.pdf; Rachel Ungar, testimony before the DC Council Committee on Facilities at: https://childrenslawcenter.org/wp-content/uploads/2023/12/RU-Draft-Testimony-EM-updated-narrative_final.pdf; William Cox, testimony before the DC Council Committee on Facilities and Family Services, (December 6, 2023), available at: https://childrenslawcenter.org/wp-content/uploads/2023/12/Wil-Cox-Testimony-for-Dec-6-2023-Hearing-on-Bill-B25-0500-and-Foster-Youth-Bheavioral-Health_FINAL.pdf.

³ Internal Children's Law Center Data Collection, "GAL Deep Dive," June 2022 through May 2023.

⁴ D.C. Law 23-270. Office of the Ombudsperson for Children Establishment Amendment Act of 2020. ⁵ *Id*.

⁶ D.C. Law 23-270. Office of the Ombudsperson for Children Establishment Amendment Act of 2020.

⁷ During the presentation the Office shared their mission and values, core duties, confidentiality, and walked the team through the process to report a complaint to the Office. We appreciate their thorough review with our team. Additionally, throughout our work with the Office, they have consistently asked how they can be further connected to the community. They have welcomed introductions across many areas of practice including education, the juvenile legal system, and youth and family facing organizations. We have appreciated their dedication to this aspect of their work and encourage the Office to continue to grow their outreach in Fiscal Year 2024.

⁹ *Id*.

¹⁰ District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115- <a href="https://

¹¹ *Id*.

¹² Children's Law Center, Testimony before the District of Columbia Council Committee of the Whole, (December 20, 2023), available at: https://childrenslawcenter.org/wp-content/uploads/2023/12/CLC-Testimony_COW_PR24-542-The-Ombudsperson-for-Children-Petrina-Jones-Jesz-Appointment-Resolution-of-2023_Final.pdf.

¹³ The intent of the legislation is clear – there are to be three distinct leadership roles within the Office of the Ombudsperson: (1) the Ombudsperson for Children; (2) the Chief Deputy Ombudsperson for Children; and (3) the CFSA Ombudsperson. Each leadership role has their own required duties to ensure the Office is independent and effective in: (1) helping children and families navigate the complexities of the child welfare system and resolve everyday problems and individual issues; (2) establishing connections with community organizations and members; (3) building relationships with other government agencies and identifying areas where interagency coordination must be improved to better meet the needs of DC's foster children; (4) thoroughly reporting on data, metrics, and trends within the Office's purview of information including the District's crossover youth population; and (5) identifying and offering solutions for systemic issues. *See* D.C. Law 23-270. Office of the Ombudsperson for Children Establishment Amendment Act of 2020.

- ¹⁴ District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, available at: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115- Introduction.pdf?Id=182575.
- ¹⁵ FY21 Office of the Ombudsperson for Children Budget, Table RO0-3, p. E-98.
- ¹⁶ DC Law L23-0270, Office of the Ombudsperson for Children Establishment Amendment Act of 2020.
- ¹⁷ LaShawn A v. Kelly, 887 F. Supp. 297, 298 300 (D.D.C. 1995).
- ¹⁸ For In 2021, when CFSA entered into a final settlement agreement in LaShawn, CSSP's court monitoring ended and so did their reporting. *See* Government of the District of Columbia Muriel Bowser, Mayor, With the End of a Three-Decade Class Action Lawsuit, Mayor Bowser Announces a New Era for the DC Child and Family Services Agency, (September 9, 2022), *available at*:

https://mayor.dc.gov/release/end-three-decade-class-action-lawsuit-mayor-bowser-announces-new-era-dc-child-and-family. There was concern that losing the court monitor and its regular publication of detailed analysis and data reports will significantly impact the Council's ability to exercise oversight over CFSA. Fortunately, the Council acted swiftly by enacting and passing the DC Law L23-0270, Office of the Ombudsperson for Children Establishment Amendment Act of 2020. See DC Law L23-0270, Office of the Ombudsperson for Children Establishment Amendment Act of 2020; District of Columbia Office of the Ombudsperson for Children, Reports, available at: https://cssp.org/publications-resources/?foc=child-welfare.

- ¹⁹ DC Law L23-0270, Office of the Ombudsperson for Children Establishment Amendment Act of 2020.
- ²⁰ District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.

²¹ *Id*.

⁸ District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, available at: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115- Introduction.pdf?Id=182575.

- ²⁵ Office of the Family and Children's Ombuds, Washington State, Annual Report 2023, (November 2023), *available at*: https://ofco.wa.gov/sites/default/files/2023-11/2023 OFCO Annual Report.pdf
- ²⁶ District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.
- ²⁷ "In FY 2023, there were a total of 588 placement moves, not counting temporary periods where youth required respite care or were otherwise absent from placements. Of this number, 134 were decidedly positive, as they included moves to the home of an adoptive resource, placement of siblings together, or discharge to a less restrictive environment. An additional 82 moves were entered as "proximity to family." This category has ambiguous implications. Although it is often selected by social workers when children are placed with relatives or placed closer to their birth family, it can also involve cases where children are moved because proximity to family is not in their best interests. The remaining 372 moves are presented below as "disruptions" for reporting purposes. They include instances in which the child requested a change, the provider requested a change, the placement provider cannot meet the child's needs, the provider is temporarily unavailable, there is a change of service, the child requires a different level of care, the provider's contract ended, or the youth voluntarily left." District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, available at: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.
- ²⁸ District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.

- ³⁰ Casey Family Programs, *What impacts placement stability?*, (May 12, 2023), *available at*: https://www.casey.org/placement-stability-impacts/; Beal, S., & Greiner, M. (2016). Children in Nonparental Care: Health and Social Risks. Pediatric Research, 79 (1), 184-190.
- ³¹ This includes quality individual and family therapy, substance abuse treatment, and medication management appointments. *See* Internal Children's Law Center Data Collection, "GAL Deep Dive," June 2022 through May 2023.
- ³² District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.
- ³³ District of Columbia Department of Youth Rehabilitation Services, What Love Looks Like A Voiceyou're your Family, December 2017, available at:
- https://dyrs.dc.gov/sites/default/files/dc/sites/dyrs/page_content/attachments/What%20Love%20Looks%20Like%20-%20A%20Voice%20for%20Your%20Family_0.pdf.
- ³⁴ Council of the District of Columbia Committee on Human Services, Committee Report on Bill 23-0437, the "Office of the Ombudsperson for Children Establishment Act of 2020," p. 15, (November 24, 2020), available at: https://lims.dccouncil.gov/downloads/LIMS/43171/Committee_Report/B23-0437-Committee_Report2.pdf?Id=114187.

²² District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.

²³ Id.

²⁴ District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.

²⁹ Id.

³⁸ As highlighted even in the second annual report by the Ombudsperson, as CFSA works to keep families together, there will be certain needs that have to be met. *See* Appendix 1. Summary of Case Recommendations, Case Summary A, in the District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.

https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.

39 The 211 Warmline and Community Response Model will voluntarily connect children, families, and community members to DC government systems of care and community-based services, and through this support, prevent unnecessary calls to the Child Protective Services (CPS) Hotline. When needed, an individual or family calling 211 Warmline can connect with a Community Responder, who can provide more in-depth phone support or connect in-person with the family or individual to navigate District-funded and community-based services to address their needs such as food assistance, housing needs, or medical benefits. See FY2023 Child and Family Services Agency Performance Oversight Responses, responses to Q113, Q114, Q115, and Q116, available at: https://lims.dccouncil.gov/Hearings/hearings/253.

⁴⁰ District of Columbia Office of the Ombudsperson for Children, Fiscal Year 2023 Annual Report, January 11, 2024, *available at*: https://lims.dccouncil.gov/downloads/LIMS/54520/Introduction/RC25-0115-Introduction.pdf?Id=182575.

⁴¹ *Id*.

⁴² District programs and services, in general, can only reach their full efficacy if there is successful coordination between agencies. Many families rely on multiple agencies to meet their health, food, and housing needs. The lack of communication and coordination by government agencies can cause families, already overburdened with the stresses of poverty, to experience more obstacles, greater administrative burdens, and increased stress. See Executive Office of the President of the United States, Tackling the Time Tax, July 2023 available at: https://www.whitehouse.gov/wp-content/uploads/2023/07/OIRA-2023-Burden-Reduction-Report.pdf; Justin Schweitzer, How to Address the Administrative Burdens of Accessing the Safety Net, The Center for American Progress, May 5, 2022, available at: https://www.americanprogress.org/article/how-to-addressthe-administrative-burdens-of-accessing-thesafety-net/; Jacque Whearty, Administrative Burden: Everyone Pays when Eligible Families Can't Access Public Assistance, Prenatal-to-3 Policy Impact Center, July 17, 2023, available at: https://pn3policy.org/blog/administrative-burden-blog/. Interagency coordination can cut down on confusion, increase communication, and better connect children and families with services that meet their needs. Investments cannot be simply allocated to a program; they also must be made with implementation in mind. This includes outlining and understanding the necessary communication, practices, and procedures of a program that allow for it to meet its objectives. We have seen ineffective implementation of District-led programs, and we hope through strengthened partnership and increased interagency coordination to fix implementation issues, so all available resources are utilized to their maximum capacity. See FY2023 Child and Family Services Agency Performance Oversight Responses, response to Q113(b), available at: https://lims.dccouncil.gov/Hearings/hearings/253.

³⁵ *Id.* at p. 17.

³⁶ Internal Children's Law Center Data Collection, "GAL Deep Dive," June 2022 through May 2023.

³⁷ FY2023 Office of the Ombudsperson for Children Performance Oversight Responses, response to Q57, available at: https://lims.dccouncil.gov/Hearings/hearings/253.