

Hampton Comprehensive Services Act Office

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January 24, 2011

The Honorable Edward Houck, Chairman
Senate Finance Committee on Health and Human Resources
910 Capitol Square
Richmond, VA 23219

Dear Senator Houck,

The Hampton Community Policy and Management Team (CPMT) applauds the collaboration between the Office of Comprehensive Services (OCS) and the State Department of Education (DOE) as it attempts to provide clarity to localities about the use of mandated funding to support children and families in their homes and communities. The recommendations to exclude the funding of residential services and to tie services to the needs that arise from the student's disability are consistent with the Systems of Care philosophy and in line with the Transformation Practice Model. The concern for the City of Hampton CPMT is the exclusion of funding to support youth in their community public school setting. Ensuring that youth remain in their zone schools with needed interventions and supports is in line with both the Comprehensive Services Act and Federal Special Education mandates. Hampton CPMT understands that the state pool spending in the services in public schools category has increased, as well as the spending in private day utilization slightly increased; therefore, producing a sense of urgency for the Senate Finance Committee to analyze and control costs. Hampton CPMT believes that a more rigorous review of the use and over utilization of private day schools would be more appropriate than removing the flexibility of communities to support youth in the least restrictive educational environment possible.

Hampton CPMT fears that if the potential to support the public school system through providing services to youth in the public school setting is restricted, school systems will inadvertently place more youth in private day schools and become less open to returning them back to the public school setting. They can simply argue that "we don't have the resources in our system to deal with these troubled youth and CSA is not permitted to work with us- so we have no choice." Hampton CPMT also fears that such a policy will destroy meaningful collaboration between public schools and other CSA partners. This would certainly prove disastrous as the public school setting is usually the first place youth and family dysfunction is identified. It would produce a significant cost increase to CSA since legislation mandates that CSA fund private day placements without any ability to offer placement alternatives or provide utilization review.

Restrictive private day schools are extremely costly to the CSA funds pool and overall, do not produce positive educational outcomes. In the City of Hampton, youth who attend private day schools over a significant period of time have lower graduation rates, poorer SOL scores, and are socially isolated. Historically, youth have been quickly placed in these costly day schools and have been slow to transition out. Youth often linger in these restrictive environments and can easily lose hope of ever having any normalcy in the school setting, such as participating in team sports, going to the prom, singing in the chorus, and being connected with a high school graduating class.

Hampton CPMT is opposed to the State Executive Council policy language that excludes the potential for use of funds for services that occur in the public school setting. We believe that this restriction is contradictory to the flexibility granted by the law and will result in an even greater over utilization of high cost private day placements that have produced poor outcomes for students.

Questions for consideration:

- 1) Does this policy change contradict with the law around flexibility, local decision making, and collaboration?
- 2) What are the unintended consequences of the policy?
- 3) What is the community? Is the local neighborhood school a part of the community?
- 4) Are rising costs a result of bad policy or a byproduct of poor CSA management on the part of some localities?

Policy changes should never be set based on funding challenges at any point in time, but should strictly be set based on how best to serve youth and families.

Hampton CPMT respectfully recommends that the Senate Finance Committee re-examines the policy language and funding restrictions and consider the issues and questions addressed above.

Sincerely,

City of Hampton Community Policy and Management Team