



2012-2013 HUMAN SERVICES & EDUCATION PLATFORM

STATEMENT OF BASIC PHILOSOPHY

The National Association of Counties recognizes the responsibility of county governments to protect and enhance the lives of citizens. Counties have been at the forefront in the implementation of a comprehensive, integrated children and families system. While the role of county governments varies widely among states, almost every county administers and pays part of the cost of some portion of the federal/state/county network of programs collectively known as welfare and social services. Human services and health expenditures are among the largest costs to county governments.

NACo recognizes the role of the federal and state governments, as well as that of county government, in strengthening community and family structures. In recognizing and building upon existing social foundations, state and local governments serve as the links between federal policies and the delivery of critical services in ways that maintain and foster self-sufficiency in communities, families, and individuals.

NACo supports a comprehensive continuum of services for families and children which facilitates coordination of parent education and support services, early childhood development, social services, public health, preventive services to children and youth and correctional services. Federal policy should promote and facilitate preventive and early intervention services to limit the need for excessive social and correctional services in the future.

Poverty is a national problem requiring a national solution. Federal efforts to reform public assistance must recognize that poverty is influenced by national economic factors not within the control of local or state governments. Providing income-maintenance benefits in the context of work programs is the way to break the cycle of welfare dependency and to improve welfare programs.

Employment rather than public assistance should serve as the mainstay for employable individuals. The goal of work programs should be to provide employment opportunities at adequate wages. They should be coordinated with economic development activities and should provide a full range of employment services. They should offer job development and job creation services, skills training and work experience, and upgrading opportunities.

In some areas of the country, such as the inner city and rural communities, there may not be enough private sector jobs to meet the demands of those individuals who are trying to make the transition to work. In these cases, government may have to be the employer of last resort. NACo therefore supports a flexible federal job development program that would allow counties to provide public sector employment if necessary.

To become self-sufficient or to sustain independence, many welfare families need support services such as education and training, child development, child care, Medicaid, mental health and substance abuse services, transportation and case management. Local governments are uniquely able to respond to the needs of their communities provided they are given the flexibility and the resources. Work programs, income security, support services and other social services

should be carefully coordinated at the federal, state and local levels in order to provide a seamless range of services.

Any programs mandated by the federal government should be fully federally funded. Counties should have adequate time to implement major changes to federally assisted programs to prevent disruptions in program delivery. Administrative changes in federal program policy and practice should be done through the federal regulatory process and should allow for formal public review and comment with appropriate and mandatory federal consideration of public comments.

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 these groups do not duplicate existing state and local coordinating efforts.

NACo urges the federal government to base decisions about federal laws and regulations pertaining to human services and education on data and measurable outcomes. Scrutinizing existing and proposed mandates using these two standards will help all levels of government reduce unnecessary and unfunded mandates, stream-line government and use limited resources more efficiently to the benefit of clients and constituents alike. NACo urges the federal government to ask the following key questions when considering legislation, rules or regulations:

- 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 staffing levels sufficient to comply with additional requirements?
- Are there measurable outcomes to be achieved by this change?
- Is there adequate federal funding to pay for all direct local costs?
- Are there models in existence 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?

As the front-line providers of basic social services, counties 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. Counties must be partners in the design and reform of human service systems. Finding the appropriate balance of basic standards and local flexibility is indeed a daunting task. NACo proposes the following principles:

- The federal government must maintain its responsibility to ensure a level of assistance and support services to children and families and equitable program administration.
- Beyond the basic level of federal protection for children, families, and individuals with physical and mental disabilities, the federal government must provide state and local governments with additional flexibility to tailor programs to meet local needs.
- The federal, state, and county governments, in exercising their mutual responsibility to support children and families, must collaborate in planning and implementing service programs which meet the particular needs of local communities.

PUBLIC ASSISTANCE

The original nature and intent of income maintenance programs is to provide adequately for individuals who cannot work and those our society has determined should not be required to work. This intent must be preserved. It is the government's responsibility to assure that all who need social services receive them.

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.

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.

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 childcare 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.

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.

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.

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 treatment, 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 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 GED education 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.

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 abuse treatment, mental 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 20 percent hardship exemption and the family violence exemption from the five year 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.

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.

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 childcare, 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.

Program Coordination: An integrated workforce development system should be encouraged by giving counties greater flexibility to coordinate programs and blend funds.

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.

Supplemental Nutrition Assistance Program (SNAP): The 2008 Farm bill made significant improvements to the Food Stamp program (now called the Supplemental Nutrition Assistance Program). These include raising and indexing the minimum standard deduction; indexing asset limits for inflation; increasing the minimum allotment for one and two-person families; and lifting the dependent care cap. However, the new law did not change the administratively cumbersome time limit for able bodied single adults or the lifetime ban on eligibility for individual family members with drug felony convictions. NACo supports greater state and local flexibility to address these two issues.

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. The 1996 welfare reform law removed large numbers of previously eligible individuals, particularly disabled children and individuals with substance abuse problems from SSI. As a result, locally funded General Assistance programs assumed the burden of aiding these individuals. The federal government should:

- Provide sufficient income maintenance benefits, including a nutrition supplement, so that state supplementation is unnecessary;
- Provide benefits to disabled, elderly, and indigents who receive care in county-owned mental, medical, and residential facilities, including nursing homes and assisted living facilities.
- Reevaluate payment levels to ensure SSI recipients are provided with an adequate standard of living;
- Reevaluate the asset limit to reflect growth for inflation;
- Extend the interim assistance program indefinitely;
- Determine eligibility within thirty days for aged and within sixty days for blind and disabled;
- Provide 100 percent of the Medicaid costs of the disabled, blind, and persons over sixty-five.
- Establish common application forms for SSI and Medicaid;
- Create a new category of SSI eligibility called "Specially Disadvantaged Individual." This category would include those persons who are unable to qualify for SSI as aged or disabled but who are unable to work due to a combination of factors including but not limited to age and work history, functional disabilities, or drug and alcohol abuse;
- Fully fund and expand SSI outreach and advocacy programs; and
- Make the process easily accessible to all applicants and include ample opportunities for applicants to provide additional information.

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. EITC expansions should be funded through the tax system and should not be offset by TANF funds. The Internal Revenue Service public awareness campaign should be expanded to ensure that all families that are eligible for the EITC receive the credit. EITC eligibility should be extended to non-custodial parents who pay their full share of child support. The EITC marriage penalty should be eliminated.

CHILDREN'S SERVICES

Early Childhood Education and Development: Research has demonstrated the importance of the early years in child development. Quality prenatal services, health care, nutrition, and pre-school education are essential to the healthy development of a child. Numerous advantages have been realized from early intervention and prevention programs, particularly home visitation programs such as Healthy Families, Parents as Teachers, and Success by Six, Educare, and Incredible Years. 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.

Finally, investment in early childhood development programs can reduce future expenditures in chronic health care services, child welfare, the juvenile justice system, and welfare. NACo supports federal initiatives to help counties develop these voluntary early childhood and parent education programs.

Congress should provide adequate funding for comprehensive programs such as Head Start, to ensure that needed educational, nutritional, and social services are available to disadvantaged pre-school children, including children with disabilities. Emphasis should be given to expanding the Early Head Start program for infants and toddlers so that they can take advantage of the program's continuum of services at an earlier age.

NACo supports strengthened coordination of pre-school programs, and other federal and state 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.

Adequate nutrition not only prevents serious health problems, but also helps children improve their ability to learn. The Supplemental Feeding Program for Women, Infants and Children (WIC) is a valuable component of the continuum of services needed to ensure children's physical and mental development. NACo therefore supports continued expansion of the WIC program.

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.

In many states child welfare, substance abuse treatment and children's mental health services are county responsibilities, yet these systems often operate independently of each other. Children whose parents abuse drugs and alcohol are more likely to be abused and neglected than children of parents who are not substance abusers. Many children in the child welfare and juvenile protection systems come from families with substance abuse. Additionally, many of these children have substance abuse and mental health problems. Unfortunately, states and counties are able to provide treatment to only a fraction of these parents and children. NACo supports funding for new partnerships among federal, state, and local child welfare and substance abuse agencies; including funding for mental health programs in schools. Counties must be involved in the planning and implementation process and must be eligible for direct funding.

NACo believes that it is possible to construct a system for the protection of abused and neglected children that retains the categorical eligibility for out-of-home care for children who cannot remain safely in their homes while at the same time increasing the flexibility of local governments to design prevention and reunification systems that meet the unique needs of communities.

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:

- De-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;

- Enhancing 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 associated with abused or neglected children should be covered and medical care required by federal policy pertaining to foster children should be covered;
- Allowing states to include 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 states and counties to apply specially designed standards and/or procedures for related foster parents who meet the state's criteria for basic health and safety;
- Clarifying the law to permit the use of TANF funds to provide support services, including childcare, to kinship caregivers of TANF-eligible children, without regard to income; and
- Allowing states to provide childcare funds and Medicaid to relative caregivers up to 200 percent of poverty.

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.

Foster Youth—Research shows that children aging out of foster care generally have poor outcomes. NACo calls for a national "call to action" to raise awareness to the issues faced by children aging out of the foster care system. Additionally, NACo supports the following measures to improve outcomes for children aging out of foster care:

- Change federal law to enable disabled youth receiving federal foster care payments to immediately receive Supplemental Security Income (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.

Training and Administration of Foster Care, Kinship Care, Guardianship and 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 a warranted 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 computerization.

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.

Court Appointed Special Advocates (CASA) are trained community volunteers appointed by courts to advocate for the best interests of children who are involved in the juvenile and family court system. CASA advocacy is cost-effective, because it is an organization of volunteers. NACo supports annual appropriations increases until the program reaches its fully authorized level.

Child Protective Services—Federal policy and local program design must ensure capacity for immediate response to reports of child abuse and a coordinated, comprehensive services system 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.

Mental Health and Substance Abuse Services for Children—Most children in need of mental health or substance abuse services do not have access to adequate services. Children in the child welfare and juvenile justice systems have a disproportionately high need for mental health and substance abuse services. In-patient and children's health treatment beds are scarce,

resulting in worsening problems, including violence. NACo supports increased federal funding for school-based mental health services and for mental health and substance abuse services targeted at at-risk children, especially children who are in the child welfare or juvenile justice system.

Child Care—Adequate, quality, and age appropriate 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 welfare 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 day care 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. States should be allowed to offer 12 months of transitional childcare coverage for families leaving TANF. At 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.

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 and of reducing welfare costs. NACo supports providing incentives to states to pass-through a higher percentage of child support collections to families on welfare by reimbursing the state child support enforcement program dollar-for-dollar. Any pass-through program must be optional and not carved-out of existing funding. NACo urges Congress to permanently restore the ability to draw federal match dollars from the reinvestment of child support incentive payments. The cap on the Child Support Incentive Fund must be removed. The 66 percent reimbursement rate for administrative costs and the 90 percent rate for genetic testing must be maintained. 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.

Support payments should be allowed to be made and distributed locally, with local accountability; with the option to encourage electronic funds transfer to provide a "single-payment plan" for employers and other payers. NACo is concerned about ensuring privacy; therefore 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 allow expanded local flexibility for automated child support payments.

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 United States 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 which 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.

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 Older Americans Act 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 daycare, 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.

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, Veteran 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. The continuity of care between formal and informal settings should be met through periodic assessments that can be measured by those who are providing necessary long-term care 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. Inter-disciplinary models such as the Programs for All-inclusive Care for the Elderly (PACE) are designed to provide services at home and in the community and maximize senior citizen's independence. NACo supports efforts to expand these programs in rural areas.

Adult Protective Services: A National Institute of Justice study estimates that almost 11 percent of people ages 60 and older (5.7 million) faced some form of elder abuse in the past year. Additionally, a 2009 report by the MetLife Mature Market Institute and the National Committee for the Prevention of Elder Abuse estimates that seniors lose a minimum of \$2.5 billion each year to financial abuse. 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.

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. For programs established and funded by the federal government and operated by counties, 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. Further, to assure equitable distribution of funds among the counties within the states, the federal government should monitor the fiscal formulas by which states distribute federal social services funds to counties.

Social Services Block Grant (Title XX)—Title XX 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 this type of services.

NACo supports restoration of Title XX Social Services Block Grant funding to a minimum statutory level of \$3.1 billion prior to the 1981 block grant reductions, and opposes consolidation of other programs into the block grant. Further consolidation of programs within the block grant would not result in savings but would shift costs to county social services budgets in addition to those caused by the federal block grant funding reductions.

Additionally, NACo strongly supports continued flexibility in the Title XX program and restoring the authority to transfer up to ten percent of TANF funds to Title XX. This flexibility enables states and counties to use the program to meet their specific local needs and goals.

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.

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, the federal government and community organizations. NACo strongly supports full funding for CSBG.

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 individuals in a wide range of living arrangements, including children, senior citizens, and those with developmental problems, as well as spouses.

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, mental health, welfare, criminal justice, law enforcement, and social service systems for effective treatment and prevention of domestic violence.

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. Assistance to pay energy costs should not be a separate, additional category or welfare program, but should be integrated with an appropriate existing administrative delivery system.

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.

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. NACo endorses the targeting of federal resources to housing first and rapid re-housing strategies and other innovations in ten year plans that have demonstrated results towards reducing and ending homelessness. NACo supports additional federal funding for ten year plans without unfunded mandates.

Veterans' Services—NACo strongly supports full funding to qualified veterans for educational, housing and medical costs. NACo endorses increased investments in solutions to veteran homelessness, and encourages both the Administration and the Congress to continue to increase the resources targeted to end homelessness among veterans. NACo supports a process that is responsive to the needs of veterans and their families, provides appropriate information, and facilitates administrative services.

Substance Abuse—NACo strongly supports enhancing and expanding prenatal and treatment programs, education, prevention programs and funding solutions to eliminate crack cocaine, and its devastating consequences on the well-being of America's families.

According to the 2003 National Survey on Drug Use and Health, approximately 7.9 million Americans ages 12 and older have tried crack cocaine at least once during their lifetime; 1.4 million admitted that they used crack cocaine in the previous year; and 604,000 reported that they used crack cocaine the month before.

EDUCATION

The health of our economy and the quality of life in our communities is directly related to the caliber of 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. In the interest of educational quality and protection of the tax dollar, county governments and school districts are encouraged to work closely together to minimize duplication of services and promote maximum coordination in the use of facilities and the delivery of services.

Although the primary responsibility for education is with the states, quality of education and equal access for all children to excellence in education are appropriate national concerns. NACo believes that the long-term prospects for initiatives such as welfare reform hinge upon our ability to create conditions whereby every child has an opportunity to achieve productive citizenship. Education is the key to that success.

Elementary and Secondary Education—Education is in the national interest and merits continued federal financial support. NACo urges Congress to substantially amend the No Child Left Behind Act to grant greater local flexibility: in the use of student achievement measures, in 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 districts can implement all aspects of the law.

NACo supports the current method of disbursement of funds to local Boards of Education, 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.

Health Services in Schools—The Medicaid program should reimburse states, local governments and school districts for health, mental health, and health-related activities 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.

Adult Basic Education—Congress should provide adequate funding of adult education, including English as a Second Language programs.

Discrimination Costs—Congress should provide increased funding to assist local communities in meeting regulations designed to eliminate discrimination.

Impacted Areas—NACo urges Congress to continue to recognize the additional burdens placed on local communities having a large number of federal employees and facilities, and to continue to provide federal aid to impacted areas to meet these extra costs involved in educating children of federal employees.

Federal Aid to College Students—NACo deems the continuation of federally backed student loan programs to be a vital necessity 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.

Vocational and Technical Education—The federal government should place increased emphasis on the promotion of vocational and technical programs across the secondary and post-secondary educational spectrum. Vocational programs should be responsive to the growth industries of the economy and should be coordinated with local welfare reform and job training programs.

Education for Children with Disabilities—NACo supports the goal of available free public education to all children with disabilities. The federal government should keep its commitment to ensure full funding to local governments so they can meet the requirements of the law. Timetables and other regulations should be coordinated with state and federal fiscal policy in order that children with disabilities receive optimal benefits from expanded educational opportunities.

Education Research and Data—The Department of Education should provide information and research data to the states, including appropriate student performance data which can assist school boards, local governments and other agencies in the monitoring and evaluation of programs.

National and Community Service—Community service instills in young people a sense of responsibility. NACo supports full funding for the Corporation for National and Community

Service, which operates programs in more than 350 separate locations, with more than 20,000 participants.

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 21st Century Community Learning Centers should be available directly to counties.

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.

LEGAL IMMIGRANTS, MIGRANTS, REFUGEES AND UNDOCUMENTED IMMIGRANTS

Legal immigrants, refugees, undocumented immigrants 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. Congress and the administration should establish an on-going consultation process on immigration issues with NACo and other national organizations representing state and local governments.

Services—Counties traditionally provide health, welfare, and social services to persons residing within their boundaries, regardless of their legal status. Since immigration is a federal responsibility, NACo believes that 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 access to federal means-tested programs such as Medicaid and TANF by prohibiting newly-arrived legal immigrants from receiving benefits for the first five years in the country. NACo supports legislation that would permit states to provide these federal programs to legal immigrant children and pregnant women from their date of entry. Additionally, the law limited refugee eligibility for Supplemental Security Income (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 immigrants and others, the federal government should strengthen its enforcement efforts to control illegal immigration. However, we oppose the creation of a national worker identification system, which could be a potential threat to civil liberties.

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 the first 36 months that a refugee is in the United States. 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.

Funding should follow refugees. It is therefore critical that funding formulas respond not just to the challenges that state and local governments face at the point of initial resettlement. The new normal of 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 handling mass asylum situations in which the United States is a country of first asylum. The legal status and rights of applicants for asylum and their eligibility for federal assistance must be clarified.

The federal government needs to 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 be allowed to use refugee employment services fund for refugees on public assistance who have been in the United States more than five years.