



April 28, 2020

Rep. Rena Moran, Chair  
Health and Human Services Policy Committee

Sen. Jim Abeler, Chair  
Human Services Reform and Finance Policy Committee

**Re: HF 3104/SF 3322**

Dear Chairs Moran and Abeler:

Thank you for your leadership during these unprecedented times. Counties appreciate your willingness to move forward with important policy changes while also addressing the urgent needs of all Minnesotans. As you consider further policy changes, counties are grateful for the opportunity to share our thoughts.

Counties believe it is important to understand the context in which these policy provisions are being offered. This peacetime emergency has necessitated many waivers and modifications that fundamentally alter the way counties deliver human services. County employees have worked tirelessly to find ways to continue to maintain enrollment in medical assistance (MA), keep children safe, and ensure that adequate mental health treatment is available, all while complying with guidance from the Department of Human Services (DHS) to keep Minnesotans safe and healthy.

As we look at what the “new normal” of what human services might look like, counties would like to offer two thoughts. First, once it is appropriate and the peacetime emergency comes to an end, counties would like to be clear that it will be impossible for counties to flip a switch and return to pre-COVID-19 operations. As we plan for the end of the peacetime emergency, legislators must consider additional flexibility and transition time for county workers.

Second, we strongly believe that counties and the state must evaluate how our programs and services changed during this pandemic and see if there are opportunities to continue to innovate to serve Minnesotans more effectively and efficiently. Counties believe there may be best practices emerging in the use of expanded technology for service delivery and we should leverage this difficult time into an opportunity to benefit the individuals we serve. We know that the Legislature shares this interest in innovation and efficiency, and we look forward to working with you and DHS to take advantage of lessons learned during this pandemic.

Finally, we wanted to highlight some key provisions of the omnibus human services policy bills:

**Qualified Residential Treatment Programs (HF 3104)**

Counties support House language that defines Qualified Residential Treatment Programs (QRTPs). Counties support a well-designed implementation plan for the federal Family First Prevention and Services Act (FFPSA) and believe statutory changes on QRTPs are needed this year to advance that effort. A successful state implementation of the FFPSA can redefine our child welfare system by prioritizing prevention efforts and using federal Title IV-E funding to support families. Further, counties appreciate the additional requirement that new employees complete required enhanced background checks prior to starting work.

Counties want to also highlight the bill's directive for ongoing work related to voluntary placements in QRTPs. Counties will be at the table for this work and will advocate for solutions that balance the need to provide services and avoid burdensome cost shifts to counties.

**Fetal Alcohol Screening (HF3104 and SF3322)**

Counties share an interest in increasing screenings for prenatal alcohol exposure; however, we have concerns with language contained in both HF3104 and SF3322. While counties are not opposed to the additional screening requirements, we do have concerns that this proposal offers no funding for technology upgrades or funding for the Department of Health (MDH) to develop county guidance on how these screenings should be conducted or tracked. County child welfare staff rely on the Social Service Information System (SSIS) to report and track cases and question the usefulness of these screenings when they are unable to be tracked through this system.

**Comfort Calls (HF3104 and SF3322)**

Counties continue to have concerns on the timelines associated with the requirements for the calls between foster families and parents and believe this will be a challenge for counties to implement. We do believe this is a best practice, and counties should be encouraged to implement and given additional guidance on how to incorporate into practice.

**Civil Commitment (HF3104 and SF3322)**

Counties support the inclusion of civil commitment provisions in both HF 3104 and SF 3322. The language to update Chapter 253B was the product of a workgroup that included a variety of stakeholders. Counties support the addition of engagement services as an option to prevent civil commitment.

**Thank you for the opportunity to provide some thoughts on this legislation.** As always, counties stand ready to answer your questions, provide input, and partner on key policy and funding initiatives.

Sincerely,



Julie Ring, Executive Director  
Association of Minnesota Counties



Matt Massman, Executive Director  
Minnesota Inter-County Association



Matt Freeman, Executive Director  
Minnesota Association of County  
Social Service Administrators