



Community Teaching Homes, Inc.

PO Box 400, Holland, Ohio 43528

6715 Dorr St, Toledo, Ohio 43615

Phone: (419) 868-1178

Fax: (419) 868-1989

[www.cthohio.org](http://www.cthohio.org)

---

Ohio House of Representatives  
Finance Health and Human Services Subcommittee

April 9, 2019

Testimony on HB 166

**Witness: Nancy Harvey, EdD, LISW-S, LICDC-CS, CSWM, ACTP**

Executive Director

Community Teaching Homes, Inc. - Toledo

Chairman Romanchuk, Ranking Member West and members of the Subcommittee, thank you for the opportunity to offer testimony on HB 166.

My name is Nancy Harvey; I am the Executive Director of Community Teaching Homes, a non-profit community agency headquartered in Toledo, Ohio that provides a comprehensive approach to the care of Ohio's challenging youth by offering placement and behavioral health services within one agency. My agency specializes in the provision of services to severely emotionally disturbed youth. We operate behavioral health services and family style therapeutic group homes throughout Northwest Ohio.

I am very encouraged by the investments in child welfare and behavioral health called for in HB 166. Those investments will help our public and private sectors more effectively respond to the opiate crisis and proactively work with vulnerable Ohioans to help them get on the road to recovery and wellness.

As the Legislature considers how to prioritize spending, it is important to consider new federal laws and regulations that our state must comply with or else face financial penalties. One such new federal law is the Family First Prevention and Services Act (FFPSA) which is the most significant federal child welfare reform law passed by Congress in decades.

FFPSA restricts how Ohio can use federal Title IV-E foster care funding for placements of children into congregate facilities, such as the therapeutic group homes that my organization manages. Further, the law enables states to use IV-E funding for more types of purposes beyond just foster care, including preventative services to families at risk of losing custody of their children. Ohio's readiness or compliance with FFPSA is not currently addressed in HB 166.



Community Teaching Homes, Inc.

PO Box 400, Holland, Ohio 43528

6715 Dorr St, Toledo, Ohio 43615

Phone: (419) 868-1178

Fax: (419) 868-1989

[www.cthohio.org](http://www.cthohio.org)

Preparing for implementation of the new federal restrictions on how our state spends IV-E funding for placements of children into congregate care facilities is a major undertaking. ODJFS has convened a leadership committee charged with planning and overseeing implementation of the new law in Ohio. As an appointed member of that committee, I can tell you that Ohio is not yet prepared, and in fact we have an uphill battle to prepare our system for implementation. I encourage the Legislature to provide necessary funding to ODJFS specifically for FFPSA readiness.

The FFPSA regulations require congregate care providers to be nationally accredited, to provide follow-up care for six months after clients are discharged from our programs, and to comply with heightened clinical and nursing standards. Meeting these new standards is a costly endeavor that many agencies will not be able to implement without financial assistance from the state. Obtaining initial national accreditation alone can easily cost over \$10,000. At a time when Ohio has an unprecedented amount of children in foster care and specifically in congregate care placement, we must be very mindful of any new regulations or standards that could restrict the availability of these placement options.

Further, as ODJFS Director Hall mentioned in her testimony last week, there are now over 470 Ohio foster youth placed in out-of-state congregate care facilities. This figure is shocking, unacceptable, and should motivate us all to expand Ohio's resources to keep our foster children in our state, close to home, and close to their caseworkers. We should also be mindful of the millions of Ohio tax payer dollars that are paid to these out-of-state facilities. In fact, past General Assemblies have considered various legislative strategies aimed at reducing the amount of Ohio foster children placed out-of-state. During that time – a few years ago – there were only about 75-100 kids placed out-of-state each year.

In closing, I encourage the Committee to consider how to invest in Ohio's readiness for FFPSA and ultimately preserve and even expand our capacity to care for these foster children in-state. The Children's Alliance budget platform calls for an investment to ODJFS of \$9 million total over the biennium. This level of investment is critical and again is not currently budgeted in HB 166.

Thanks again for your time today.

Nancy Harvey, EdD, LISW-S, LICDC-CS, CSWM, ACTP  
Executive Director, Community Teaching Homes, Inc.  
[nharvey@cthohio.org](mailto:nharvey@cthohio.org) 419-214-3646