Overarching impressions:

- 1. The commitment to becoming an antiracist organization is commendable and should be celebrated, but further definition and identification of measurable goals and targets in this regard is needed to reinforce this commitment.
- 2. The five-year timeframe for the Strategic Plan seems too long, especially where the goals and focused work are either undefined or too narrow, and given the rapid pace of change in our current political and social environments. A three-year plan seems more workable.
- 3. Uniformly be bold in commitments to quantifiable targets and goals (like reducing children in out-of-home care by half) across entire strategic plan and intention areas, commit to timeframes of expected change, and provide clarity on theory of change for each intention area.
- 4. There is opportunity to incorporate integration and alignment of services within each intention area to illustrate how the agency intends to accomplish this over the multi-year timeframe. The focused work across all priorities fall short in connecting to the bigger impacts envisioned in DCYF's mission and the cross cutting themes described in the plan.
- 5. Youth and Young Adults should be included in the *Focused Work* in DCYF's priority to *Safely reduce the number/rate of children in out-of-home care by half.*
- 6. Youth, family, provider, and caregiver voice should be incorporated throughout the Plan wherever recommendations call for collaboration or consultation are made.

SPECIFIC RECOMMENDATIONS:

1. Equity

- a. Define Antiracism. We think this is an exceptional aspiration, and encourage DCYF to specifically define anti-racism and push beyond goals that simply measure disproportionality in our current systems. Specifically, it would be helpful to see how DCYF defines antiracism and how DCYF imagines it would look as an antiracist organization. Without additional detail, the activities outlined in the "Become an Anti-Racist Organization" don't tie to a specific theory of change or the concrete steps to get there. It's understandable that the agency may be at very early stages of the journey, but it would help a great deal to outline how the initial steps are the path toward the goal.
- b. Use concepts of antiracism and equity and apply them throughout the strategic plan. DCYF's specific understanding or definition of anti-racism should explicitly impact each component of the forthcoming strategic plan. We encourage DCYF to reflect how each component of the upcoming strategic plan impacts or is impacted by DCYF's definition of anti-racism in this document. Parts of the strategic plan have strong language and aspirations around equity, however the focused work described on page 5 lack definition on the targets for accomplishing the work described. The monitoring Plan for this goal also seems disconnected from the focused work that is described.

c. Examine and Set Goals to Dismantle Racist Structures. The DCYF plan recognizes and chronicles some of its racist impact and foundational histories, but it does little to carry this understanding to its goals and focused work for the next 5 years. The plan recognizes the racist foundations of the assimilationist project of Indian Boarding Schools, the racist impact of economic policies and policing strategies, and the extent to which the historic impetus for foster care was steeped in racist attitudes about families and "worthiness" to parent. DCYF would do well to also examine and call out how Adult and Juvenile prisons evolved from the enslavement of black people. (See, e.g., Angela Davis, Are Prisons Obsolete (2003), see also, Michelle Alexander, The New Jim Crow: Mass Incarceration in the Age of Colorblindness (2010). With these revelations in mind, DCYF should commit to dismantling strategies and institutions with racist foundations. It cannot both be an anti-racist agency, and continue to uphold racist institutions. At a minimum, DCYF should commit to specific decarceration strategies and set forth specific dates to identify milestones in the process.¹

2. Safely reduce the number/rate of children in out-of-home care by half

- a. Basis for identifying goal of cutting children in out-of-home care in half. Cutting the foster care population by adding prevention services is an inherently good idea, but getting access to new prevention resources to affect a reduction of this magnitude seems potentially unlikely. Considering the priority to also address disproportionately, specific reduction goals for children and youth of color are necessary and those goals have to exceed the average reductions in the entire population to move towards parity. Given this, what is the logic behind the goal of cutting foster care in half and on what basis is this achievable? How can this process of target setting be applied to every other goal identified in this plan?
- b. **Clarification on intention of community-based alternatives to mandatory reporting.** Given the requirements of mandatory reporting process in statute, further information regarding the alternative consideration in this strategy would be helpful to understand the intended impact and outcome.
- c. **Prioritize re-working the practice model.** As presented in the plan, it seems current practice with the existing practice model may unnecessarily bring children into care. Further context on the current model and expectations on what the intention of re-working the model are would be helpful. And if re-working the practice model is believed to have this effect, it should be the highest child welfare priority because it impacts many other goals like disproportionality reduction, the need for consistent family time, staff turnover, and the model for supervision-- not to mention the human toll on children who are unnecessarily separated from their families.
- d. **Quantifying goals for reducing length of stay.** The strategies to address length of stay would be strengthened with quantifiable goals for reducing LOS. If we can advance bold goals like

¹ For illustration, DCYF might choose to follow King County's lead in its commitment to zero youth detention by 2025. See Elise Takahama, King County Executive Dow Constantine commits to depopulate youth jail by 2025, July 21, 2020 https://www.seattletimes.com/seattle-news/king-county-executive-dow-constantine-commits-to-depopulate-youth-jail-by-2025/, see also King County, Roadmap to Zero Youth Detention available at https://www.kingcounty.gov/depts/health/~/media/depts/health/zero-youth-detention/documents/road-map-to-zero-youth-detention.ashx

cutting foster care in half we should be able to identify reasonable LOS reduction goals, particularly in areas of the state with disproportionately long stays or an abundance of short stayers (1-3 days) which would indicate that placement may have been avoidable.

- 3. Create Successful Transitions Into Adulthood. The focused work described in this agency priority could and should be much better aligned to the agency's bigger theory of change for serving youth and young adults. The list of activities seems more oriented to improving current approaches or mitigating their impacts, rather than leveraging the potential that a desiloed and prevention oriented DCYF could achieve. If the agency wants to work towards race equity and antiracism, much bolder and transformational approaches are necessary. We also recommend setting some measurable targets for the focused work and activities. We can point to ways in the current categories of focused work that DCYF could pivot.
 - a. Least Restrictive Environment. The activities described in this section lack definition and measurement and a tie to how DCYF sees its own role in transforming systems to better serve young people. As listed, the activities suggest an incremental approach to stepping young people down from JR institutions and community facilities. In contrast, the next section we outline specific strategies for keeping young people in the community, rather than in institutional settings. Too, DCYF could envision more bold targets for least restrictive environment, by setting goals of moving current and expected JR youth into community settings that support their independence and success. Setting specific targets will help guide law, policy and practice changes that could be advanced over the next 5 years.
 - b. Strengthen Therapeutic Environments. The activities listed here are very grounded in what we already expect the DCYF to be doing. There is tremendous opportunity for DCYF to prioritize approaches for addressing the health and wellbeing of young people currently in care, including incorporating trauma informed care and culturally meaningful providers and approaches to mental and physical well-being. Both of these concepts are in the DCYF plan, but don't tie at all to the two activities listed in this section. Too, there is opportunity here to incorporate a diversion/prevention approach with measurable targets and explore opportunities to share/align services for JR youth and young adults that may currently be restricted to child welfare. Such an approach would also align with the statutory intent for DCYF to de-silo services. For example, to strengthen therapeutic environments, DCYF could set a target of increasing the number/percentage of treatment oriented disposition alternatives for young people over the next five years which also would accomplish prevention, treatment, race equity and harm reduction goals.
 - c. Enhance Stability and Quality of Adult Relationships. We found the description of focused work here and the activity listed to be overly narrow and not connected to concrete strategies for ensuring that young people have stable and healthy and supportive relationships. Also, as we've noted earlier, any activities and strategies should tie to race equity and antiracism goals and the cross cutting themes (specifically,

trauma informed approach, integration and alignment of services, and partnerships) that are listed in the plan.

4. Create a high quality B-8 system

- a. Work with families to define "quality" and how they would measure it.
- b. Adopt meaningful strategies and measures for BIPOC children to further the pursuit of equity in early childhood development. Reference the <u>National Black Children</u> <u>Development Institute</u> and the <u>State of the Black Child Report Card for Washington</u> for identifying meaningful and measurable outcomes for children of color that may differ from standardized measures that may assess child development disproportionately across race and ethnicity.
- c. Include strategy to analyze utilization and outcomes of ESIT for diverse populations.

5. Improve Quality and Intention of Our Practice

a. Further definition of supportive supervision as an indicator of culture change. Since this is key to the culture change as identified out in HB 1661 (2017), this would be important to understand how exactly it is intended to be funded, implemented, and measured.

6. Additional Comments & Observations:

- a. Youth and Young Adults should be included in the Focused Work in DCYF's priority to Safely reduce the number/rate of children in out-of-home care by half. The targeted work for dependent youth would also benefit youth facing JR commitment, including reducing length of stay, preventing entries into county detention and JR, and improving service availability. Setting clear and bold goals in this area would also tie to an antiracist strategy of phasing out and eliminating the use of prisons and carceral settings. All of these targets and areas of focused work could be improved by collaborations with the health, mental and behavioral health agencies, OSPI and local school districts, and community based providers. Specifically, we recommend that DCYF include and set goals for reducing the number of youth and young adults in JR institutions and community facilities. We can point to a number of existing pathways for accomplishing this that would tie to concrete monitoring indicators, including:
 - i. Increasing and aligning adolescents supports so that more youth receive disposition alternatives in the community rather than JR commitment.
 - ii. Aligning short term supports for youth to stabilize, grow and sustain **community based alternatives to detention and diversion from formal prosecution** which could be improved by collaborations with health, mental and behavioral health agencies in the private sector and CBO's likewise contemplated in the statute.
 - iii. **Substantially reducing length of stay** in JR facilities and county detention by aligning and delivering services so that predisposition incarceration and moves to JR institutions is used as a last resort.

MONITORING PLAN

Overarching Themes

Recommend a tighter connection between the monitoring strategy and the priorities in the plan.

- The most highly developed outcomes are those associated with other requirements, such as
 federal and performance based contracting. As measures become more refined, we are hopeful
 we will see more quantifiable, accessible indicators with direct relevance to the highest
 priorities in the plan.
- Encourage the identification and commitment to targets and associated timelines for outcome and balancing indicators for all priority areas.

Safely reducing children in out-of-home care by half

• If expanding and integrating strategies for youth in the child welfare system to youth facing JR commitment (as recommended on page 4 of this document), monitoring indicators for this section can be applied for crossover youth, furthering efforts to integrate and align services.

Create Successful Transitions into Adulthood

 Meaningful driver indicators for this priority could include the number of disposition alternatives, number of diversions, and length of stay for youth involved in the JJ/JR systems.

Create high quality B-8 system

- "Percentage of 3-4 year olds participating in high quality preschool" seems to be more of a driver indicator than an outcome indicator. And Kindergarten Readiness would make a more logical outcome indicator.
- A B-3 outcome indicator should be considered, such as to how many children make positive
 developmental progress in a variety of developmental domains through the ESIT program, or
 how many children are able to fall within the typical range at age 3 after exiting from ESIT.
- Consider a school-age outcome indicator to capture the higher age range of this intention area, potentially 3rd grade reading level.
 - Though there are concerns regarding how BIPOC children perform on standardized tests. We support DCYF's interest in identifying indicators that evaluate how the system serves families, and not an evaluation of children and families themselves.
- Provider diversity could be a balancing indicator for quality.
- Consideration of exclusion data as a balancing indicator for school age children, further consideration for how to collect for child care.