Statement on Attempts to Reorganize CDD in the FY22 Budget 2/12/21

In testimony on H.171 this week, DCF Commissioner Brown spoke about the Department's concern with moving forward with the CCFAP system changes called for in this bill without first conducting an in-depth study of the system and the impact of the proposed changes. He cited the need to understand the possibility of unintended financial, administrative, and programmatic consequences.

The Commissioner has also recently shared a plan to eliminate the Child Development Division (CDD), moving the administration of the programs currently in that Division to other State Departments, effectively dismantling the highly effective, integrated services that CDD currently implements through Children's Integrated Services (CIS) and other programs.

This CDD elimination plan, we are told, is still in the "study" phase for which they claim they are gathering stakeholder feedback and input, and would not go into effect until FY23 at the earliest.

What the provider community is seeing now, however, is the rapid dismantling of certain portions of CDD through this year's budget development process. Each one of the following proposals contained in DCF's FY22 budget proposal is, in and of itself, a serious policy change. Together, they signal this Administration's intention to move forward now, in FY22, with dismantling CDD regardless of what the consequences might be, which may well compromise the ability of providers to implement highly innovative services that are proven to be effective for Vermont's young families.

It can be argued that these policy and programmatic changes will make life easier for the AHS and DCF business offices while making it much harder for the families they are supposed to serve. These include:

- Merging CIS transportation services with Family Services Division transportation services, and moving the service delivery out of community-based providers to a single, statewide provider;
- Moving state home visiting oversight one of the four components of CIS out of CDD to the Department of Health; and,
- Leaving vacant the CIS Director position in CDD.

Each of these changes, if implemented, will have both intended and unintended consequences, as well as predictable and unpredictable financial and administrative implications.

We ask that the Commissioner heed his own recommendations around H.171 and the need for a study before implementing serious system and policy changes, and apply them not just to CCFAP but to CDD and CIS. No evidence has been provided to indicate that the impact of these changes to CDD on young families and children is fully understood or anticipated.

The FY22 budget planning process is not the place to begin the poorly thought-out dismantling of the Child Development Division.

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