

Comments and Responses on ARC 2124C
Child Welfare Rate Increases, 441—Chapters 150 & 202
Received September 21, 2015

The Department received written comments on this rule making from the respondent listed below. The respondent's comments and the Department response are shown in the summary below.

1. Nancy Augustine

COMMENT:

The respondent requested that the 5% funding increase be reallocated or repealed for the following reasons:

1. Sufficient explanation is lacking as to how this increase would benefit child and families of Iowa.
2. The respondent points to a statement that "no potential cost to the state of Iowa as a whole" would exist, however \$659,184.00 is cited as coming from the 2016 and 2017 general fund. The respondent asks, "Why?".
3. According to the respondent, a drop in service requests to service providers was expected and desired when the Differential Response program was initiated in 2014. The respondent observed this to be inconsistent with other language from the department.

The respondent also makes reference to "past lobbying by special interest groups who have personal relationships with members of the legislature or Department of Human Services" and suggested that "appropriations in this manner further undermine the public's trust that funding is being appropriated in an ethical manner and for the best interest of children and families."

The respondent offered additional appropriations that she feels would better serve the children and families of Iowa:

- Kinship and/or guardianship care
- Community Services which have increased since the implementation of Differential Response
- Improved results
- Child abuse prevention

RESPONSE:

The Department is amending rules to implement the legislative appropriated action, and therefore, does not have authority to repeal or reallocate the funds appropriated for this purpose. In regard to the question about the cost of this change to the state, there is a legislative appropriation for the rate increase, which represents a cost to the state of \$659,184.00. The Department appreciates your recommendations for alternative

funding. The Department will not amend the proposed rulemaking based on the respondent's comments.