

February 16, 2018

Pratiba Sideshmukh  
UNC School of Government  
CB 33330 Knapp Sanders Building  
Chapel Hill, NC 27599-3330

Re: Request for Public Comment on Social Services Regional Supervision and Collaboration Working Group Maps

Dear Members of the Working Group,

Thank you for the opportunity to submit comments on the proposed maps and design of a regional model for Social Service delivery that is grounded in the community context while maximizing coordination and collaboration with county and community level groups. The North Carolina Justice Center, a non-profit, non-partisan organization working to advance economic opportunity and prosperity for every North Carolinian in every part of the state, shares these Working Group priorities.

We additionally appreciate the approach that the Working Group has taken to look comprehensively at the economic services, child welfare and adult protective services delivered by the Departments of Social Services (DSS). Given the opportunity to identify alignment across public programs, leverage resources, and address root causes of economic and social challenges, such a comprehensive view is critical to improving well-being for North Carolinians. Therefore, we hope that the conversation about regions will be explicitly guided by the principle that it should improve the service-delivery model for economic services as well so that North Carolinians are better off after this change.

We support the Working Group's effort to establish regions for the delivery of support, resources and supervision to county departments so that local access is retained and greater opportunities for these goals of alignment, innovation and fiscal stewardship are achieved.

While we do not believe that one map is necessarily better than others, we do have suggestions about how to improve on them:

1. Focusing solely on judicial districts reflects a prioritization of protection functions of DSS offices over economic services and undermines your stated priority for recognizing the range of services delivered by DSS offices. Given that labor commuting zones and local workforce development boards have different overlays on the counties of our state and are important to the improved economic and employment outcomes sought by DSS offices as well, these factors should be given equal weight in the development of regions.
2. We are concerned about the various shifts that will continue in 2018 regarding potential legislative changes to judicial districts and the administrative definition of regions for Medicaid transformation. Considering that many Medicaid beneficiaries require a range of economic services to achieve desired health outcomes, it is best to reduce barriers and burden to consumers accessing these services. For that reason, establishing maps before those processes have been worked through could disrupt the effectiveness of any final outcome from this process.

3. Given the importance of connecting rural and small communities to resources and innovation, we would hope that regions could include some consideration of connecting large to mid-size counties with smaller counties. In this way, resources and practices could be shared across contexts. This will require, however, some expertise and channel for ensuring that regional staff are knowledgeable of both contexts and what is working in other small counties across other regions.

Finally, any regional infrastructure and accompanying support must be fully funded to meet the goals of the Working Group. We urge the Working Group to document concretely the investment that will be needed to fully realize the vision of regional support from the NC Department of Health and Human Services including staff time, training and travel.

As well a regional support from the NC Department of Health and Human Services won't be successful without fully funding the DSS offices to deliver services across economic, child and adult protection services. The reality is that without a commitment to fund high quality services, it will continue to be difficult to retain talented staff, support innovation and meet the growing need for services. To date the state General Assembly has failed to fully fund the corrective plan for child protective services to maintain reasonable caseloads per case worker and to direct federal dollars intended to support the economic well-being to fund innovation through DSS offices.

Changing the structure of support and providing additional regional staff will not go far enough without resources to build a system that supports the well-being of every North Carolinian and their community.

We look forward to ongoing conversation about the proposed maps and the move to regional support from the NC Department of Health and Human Services. To further discuss these comments, please contact Alexandra Sirota, Director of the Budget & Tax Center, [alexandra@ncjustice.org](mailto:alexandra@ncjustice.org), 919-861-1468.

Sincerely,

  
Alexandra Forter Sirota  
Director, Budget & Tax Center  
North Carolina Justice Center