



State of Minnesota
Minnesota Department of Corrections
Office of the Commissioner

December 29, 1998

Jim Nobles
Legislative Auditor
Centennial Building
658 Cedar Street
St. Paul, Minnesota 55155

Dear Mr. Nobles:

You and your staff are to be commended for your report entitled *Juvenile Out-Of-Home Placement*. The report is an excellent compilation of useful information that will be invaluable to policymakers. Thank you for being responsive to our suggestions for changes.

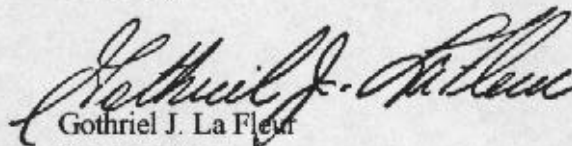
We appreciate the acknowledgement in several areas of the report that our department has taken steps to improve programming offered at our juvenile facilities. As noted in the report, we completed a statewide survey of juvenile services professionals and held forums in each judicial district to ensure that these improvements match local needs. We are confident that these enhancements will be very well received. However, your report is helpful to us as we review any further modifications. We will continue to work with local jurisdictions to ensure that residential and non-residential services for youth are strengthened and improved.

We support the notion suggested in the report that there will be continued improvements in the system with the implementation of the newly developed umbrella rule.

The report articulates the moratorium issue by including both sides of the debate. Our department supports the need for a "free market" but also is concerned about unneeded bed expansion. Documentation of bed need prior to expansion is logical particularly in recognition of the fact that the report documents a lack of statewide need. We are concerned that expansion may result in unnecessary out-of-home placements. However, the moratorium is clearly an issue for legislative reconsideration and you have provided a very informative backdrop for that discussion.

Again, we appreciate your work on an excellent report.

Sincerely,


Gothriel J. LaFleur
Commissioner



Minnesota Department of **Human Services**

December 30, 1998

Roger Brooks, Deputy Legislative Auditor
Office of the Legislative Auditor
First Floor South
Centennial Office Building
658 Cedar Street
St. Paul, MN 55155

Dear Mr. Brooks:

I appreciate the time you took to meet with staff and the opportunity to review the juvenile out-of-home placement report from the Office of the Legislative Auditor. I welcome a discussion on issues, such as out-of-home placement, that we care so deeply about and the chance to comment on the findings of your research.

This will help our department, the Minnesota Department of Corrections, and counties as we work together to help juveniles affected by our systems of care. Your independent review of out-of-home placement services will assist us in improving our practices and policies and ultimately help Minnesota's most vulnerable children.

Your report thoroughly and accurately conveys the situation that more than 17,500 Minnesota youth in out-of-home placement face each year. The questions you asked about costs, screenings, assessments, facilities, county practices, and future needs are all valid and critical launching points for further work on behalf of children.

We too are concerned with the inconsistency in decisions about out-of-home placement, the need for improving assessment of children's needs prior to placement, and increasing understanding of strengths and weaknesses of the services available.

With \$225 million in out-of-home placement costs through federal, state, and county funds in 1997, \$171 million of which is dispersed through the Department of Human Services, we understand the need for consistency in practices and the importance of accountability in our use of public funds. We agree that new funds for out-of-home placements should not be based solely on the number of placements in counties. We also endorse the need for a variety of facilities and services to best meet the individual needs of children.

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While relatively few children are in out-of-home placements outside of Minnesota or more than 100 miles from their home, we are still very concerned with the difficulty in maintaining natural support from families and friends because of the distances involved and the costs that are expended for out-of-state services.

As your report points out, youth need a variety of services, many of which are nonresidential. We believe the need for out-of-home services may diminish if a full range of services, from services for runaway youth to services for youth with severe emotional disturbances, is readily available. We will work closely with the Minnesota Department of Corrections and other partners to ensure this in the future.

Because we too are focused on outcomes, we support the recommendation to develop uniform placement goals and clearly define individual outcomes for each juvenile out-of-home placement based on the individualized needs of children. As a natural consequence, we should follow up on the courts' goals to ensure they are met.

Finally, we endorse your recommendation for improving our data. We came to the same conclusion several years ago and we are developing the Social Services Information System.

Upon review of the report, we found some additional issues which we wish to bring to your attention. Specifically,

- On page 108 there is a recommendation that the Department of Human Services identify and correct errors in its existing juvenile placement database. We want to make it clear that a great deal of effort goes into auditing and correcting county data. Until now, we have not had the staff to do on-site audits of county data as well. In early 1999, four regional child welfare program consultants will begin regular record review of county child welfare cases. This will enhance the auditing already being performed.
- In reference to the discussion on page 75, Minnesota has adopted the wrap-around process because of the widespread support in the literature for its efficacy, demonstration of its cost effectiveness, and improvement in child and family functioning. We will provide a review of literature in this area if you are interested.

Thank you for this fair and useful report. It will help us improve services to children in out-of-home placement throughout Minnesota.

Sincerely,



David S. Doth
Commissioner