



Nebraska Children's Commission
1225 L Street, Suite 401
Lincoln, NE 68508

May 31, 2019

Re: Review of Normalcy Plans and Reports by the Strengthening Families Act Normalcy Subcommittee April 2018 to March 2019

To Whom It May Concern:

The federal Preventing Sex Trafficking and Strengthening Families Act, Public Law 113-183, represents a culture shift to allow children and youth to grow and thrive in less restrictive, more family-like environments and participate in age and developmentally appropriate activities.

The Strengthening Families Act Committee (pursuant to NRS §43-4218) and its subcommittees are comprised of representatives from the executive, judicial and legislative branches of government including child welfare and juvenile justice stakeholders and youth with previous system involvement. The Normalcy Subcommittee (referred to here as "the Subcommittee") was created to monitor and make recommendations regarding the implementation of normalcy provisions in the state and the federal Acts (referred to in this document as the "SFA").

The SFA Committee assigned the Normalcy Subcommittee the task of reviewing the Normalcy Plans and Reports submitted by child-caring institutions to the Department of Health and Human Services pursuant to NRS §43-4706. We want to thank you for the time you put into your Normalcy Plan and Report. This is a great opportunity for us to provide children with a sense of normalcy while they are placed in a congregate setting. We have had an opportunity to review your agency's submission, as well as the Plans and Reports of several other child-caring institutions, and have provided a summary of our review below.

The plans reviewed indicate a variety of strengths in agency planning.

- Most agencies are currently implementing normalcy practices in one or more settings outlined on the Plan/Report template.
- Most agencies plans are individualized to meet the needs of the youth they serve.
- Most agencies provided detailed responses to how they are implementing or intend to implement normalcy practices.
- Acknowledging youth's individuality, individual expression, and the need for normalcy and cultural compassion in agency planning is an excellent first step that each agency promotes.
- While some settings indicated they were unable to provide a youth council, because of the short term nature of the facility, other agencies were able to provide substitute opportunities for youth to provide feedback and youth voice in policy/practices of the agency.

Summary and Findings of Review:

- **SFA represents a cultural shift in practice and approach.** This requires stakeholders at every level to make a transformation. This takes time, analysis, and feedback to continue the growth necessary to fully implement this important Act. As such, this is a new process for DHHS and agencies. The introduction of the two part (Report & Plan) template will be a useful tool for all involved. Last November was the first time the template was used and there will likely be improvement in completing the document over time.

- **Variation in amount and quality of information provided.** There was a wide variation in what was submitted. Some agencies provided very short answers and copy-pasted from one section to another, and others provided comprehensive, multi-document packages above and beyond what was requested. For example, rather than providing agency policies, write about the policies relevant to the question being asked. This can be something that is worked out between DHHS and the agencies, and will likely improve over time.
- **Use examples.** Some of the agencies provided copies of their youth bill of rights, or other policies/procedures. To better demonstrate the application of normalcy, reports should have examples (without identifying information) which demonstrate the agency's understanding and identify how the agency individualizes their plans for the youth. Include examples, when asked, in the report of how you implemented the plan of each subsection based on individual(s) that were/are at your facility (without sharing identifying information).
- **Opportunities for growth.** Plans should be transparent and identify areas of growth and barriers the agency faces. Always enter information into the 3rd section of each question (part C) when completing the report questions. There should be changes that can be made to your plan. We encourage agencies to detail steps on how the agency will address areas of growth and barriers.

As you work on submitting the plans/reports due to your contract monitor this year, feel free to use this feedback to assist your agency in integrating normalcy for youth. For questions, please contact the Children's Commission staff at NECC.Contact@nebraska.gov or (402) 890-6510.

Sincerely,

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Executive Director
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