

**GAO**

**Testimony**

Before the Subcommittee on Select Education, Committee on  
Education and Labor, House of Representatives

For Release on Delivery  
Expected at  
10:00 a.m., EST  
Thursday  
February 27, 1992

**CHILD ABUSE AND  
NEGLECT**

**Progress of the National  
Center Since May 1991**

Statement of Joseph F. Delfico,  
Director of Income Security Issues,  
Human Resources Division



## SUMMARY

The Chairman, Subcommittee on Select Education, House Committee on Education and Labor, asked GAO to provide information on the National Center on Child Abuse and Neglect's (NCCAN) progress, since our May 9, 1991 testimony, in fulfilling its mission under the Child Abuse Prevention and Treatment Act (CAPTA). The Chairman specifically requested that GAO examine NCCAN's progress in obtaining resources, such as staffing and budget, to fulfill its mission of identifying, preventing, and treating child abuse and neglect, and to comment on whether NCCAN can assume a role in S. 838 (Child Abuse, Domestic Violence, Adoption and Family Services Act of 1991).

To assess NCCAN's progress, GAO reviewed (1) the reorganization of components within the Administration for Children, Youth and Families (ACYF) and its effect on NCCAN; (2) NCCAN's current efforts to monitor its grantees, manage the clearinghouse and resource centers, implement the National Child Abuse and Neglect Data System, and complete CAPTA-mandated reports; and (3) changes in NCCAN's staffing levels, expertise, and travel budget.

In general, NCCAN's placement within the ACYF structure, as a result of the reorganization, appears to have improved its ability to exercise control over its budget and policy initiatives. The reorganization eliminated a level of approval for NCCAN and enabled NCCAN to directly present staff and budget requests and policy initiatives to ACYF.

Since GAO's May 1991 testimony, NCCAN has filled four open positions but its staff authorization has dropped by one. Moreover, NCCAN has only partially met its CAPTA responsibilities. While NCCAN has prepared CAPTA-mandated reports, all the reports still have not been issued. With a travel budget of slightly over \$6000, NCCAN was able to visit 15 (3.8%) of its 392 grantees. Though NCCAN has a budget of \$23,000 for monitoring in fiscal year 1992, we question whether this will permit NCCAN to perform enough site reviews to effectively monitor grantees. NCCAN has still not been able to assess the adequacy of technical assistance it provides to grantees.

Regarding a potential role in S. 838, we question whether NCCAN has the staff or expertise to administer S. 838's proposed Child Abuse Treatment Improvements Grant Program. NCCAN's Director has indicated that, with additional administrative support, NCCAN could share the added responsibility with the Children's Bureau, which administers services emphasized by S. 838. We believe that NCCAN is unable to meet its CAPTA responsibilities with its current resources. Assigning NCCAN responsibility for S. 838 without additional resources may further limit NCCAN's ability to administer its grant workload as well as its ability to effectively administer the new responsibilities.

Mr. Chairman and Members of the Subcommittee:

I am pleased to be here today to update our previous testimony on the National Center on Child Abuse and Neglect's (NCCAN) implementation of Public Law 100-294, the Child Abuse Prevention and Treatment Act of 1988 (CAPTA). Along with information on the Department of Health and Human Service's (HHS) recent reorganization and its effect on NCCAN, you asked for information on NCCAN's progress, since our May 1991 testimony, in obtaining more staff, expertise, and travel funds to accomplish its CAPTA responsibilities. These responsibilities include administering grants, ensuring that the clearinghouse and resource centers disseminate child abuse and neglect information and provide technical assistance, developing the national data collection system to record statistics on the incidence of child abuse nationally, and issuing CAPTA-mandated reports on selected child abuse and neglect issues. You also asked us to comment on a potential role for NCCAN in administering the proposed Child Abuse, Domestic Violence, Adoption and Family Services Act of 1991 (S. 838).

In summary, the reorganization has had a positive effect on NCCAN, by allowing it to bring child abuse and neglect issues to the direct attention of ACYF and compete for resources on an equal basis with other ACYF components. NCCAN has made progress toward meeting its CAPTA responsibilities but has not fully met all of the law's requirements. Although NCCAN made slightly more

site visits to grantees in 1991 than in 1990, it has not evaluated its technical assistance or issued CAPTA-required reports to the Congress. NCCAN improved the clearinghouse's ability to disseminate information but has not yet identified potentially successful programs. NCCAN has made progress on and will soon complete the first phase of the national data system. Despite the progress, however, we believe that NCCAN's limited resources will continue to prevent it from effectively managing its grant workload, which now exceeds 390 grants annually. Thus, assigning NCCAN responsibility for the grant program proposed by S. 838 without additional resources would further limit its ability to manage the current workload or reduce its ability to effectively manage the new program.

#### REORGANIZATION OF CHILDREN AND FAMILY SERVICES

NCCAN is an agency within the ACYF, which is a part of the Administration for Children and Families (ACF). In our previous testimony, we reported that an HHS reorganization established the ACF but that ACF's organizational plans and their potential effect on NCCAN programs were not yet known. We expressed a concern that NCCAN issues might not be given priority attention. It now appears that the reorganization has given NCCAN more visibility within ACF. NCCAN was removed from the Children's Bureau and placed at the same level. NCCAN now reports directly to ACYF, thereby eliminating a level of clearance. NCCAN is now able to make direct requests for staff and budget and bring child

abuse and neglect issues to the direct attention of ACYF. The true effect of this reorganization will become more apparent, however, after some time has passed and a better comparison can be made with the prior organizational structure.

#### GRANT ADMINISTRATION

NCCAN's grant workload increased substantially in the past year. NCCAN's reported workload increased from 288 grants, amounting to \$39.2 million, in 1990 to 392<sup>1</sup>, amounting to \$68.5 million in 1991. NCCAN's active grants<sup>2</sup> included 108 basic state grants (including medical neglect/disabled infant grants), 47 challenge grants, and 101 discretionary grants. NCCAN also awarded 42 grants under the Children's Justice Act (P.L. 99-401). NCCAN was also responsible for awarding and managing 94 grants under the Emergency Child Abuse and Neglect Prevention Services Program.

---

<sup>1</sup> In our 1991 testimony, we reported challenge and Children's Justice Act grants awarded in fiscal year 1990. To be consistent with our 1991 testimony, we excluded 47 challenge grants and 43 Children's Justice Act grants from NCCAN's total grant figures since these grants were awarded in fiscal year 1990 and had terms which overlapped into 1991.

<sup>2</sup> NCCAN awards public and private entities two types of grants: emergency services grants to deliver services to children whose parents are substance abusers, and discretionary grants for research and demonstration projects to identify, prevent, and treat child abuse and neglect. NCCAN awards states several types of grants: basic state grants to develop, strengthen and implement programs to prevent and treat child abuse and neglect; medical neglect/disabled infant grants to respond to reports of medical neglect, particularly, for disabled infants with life-threatening conditions; challenge grants to improve child abuse prevention efforts and establish children's trust funds; and children's justice act grants to improve administrative and judicial handling of child abuse cases.

In our May 1991 testimony, we reported that NCCAN relied on periodic group meetings with grantees to monitor their performance and had made few site visits of the grantees for this purpose. While NCCAN continues to hold these group meetings, it made site visits to 15 (15%) of its 101 discretionary grantees between July and September 1991. Site visits allow NCCAN staff to respond to grantee questions and concerns, provide technical assistance, observe project activities, make preliminary assessments about grantees' performance, and make recommendations for improvement and follow-up.

NCCAN officials stated the site visits also enabled NCCAN staff to develop a background in evaluating grantees and various approaches to performing grant evaluations that NCCAN plans to present at future periodic meetings with grantees. Through the site visits, NCCAN also furthered an evaluation study of NCCAN-funded, comprehensive community demonstration projects. The study aims to ascertain the effectiveness of prevention systems. During the site visits, NCCAN staff assessed the projects to ensure that critical design components were in place in order that the projects' outcomes could be scientifically validated by an independent contractor. These site visits represent NCCAN's first major effort towards evaluating grantees.

In our prior testimony, we expressed a concern that shortages in staff and resources were hindering NCCAN's grant administration

activities and preventing NCCAN from complying with related HHS policies. Although NCCAN has completed some on-site reviews and has begun to assess grantees' needs, we still question whether the number of on-site visits is adequate. HHS's Grants Administration Manual (chapter 11, section I), which applies to discretionary grantees, states that on-site visits should be made at least annually to each grantee, subject to the availability of resources. NCCAN visited 3 of its 93 discretionary grantees in 1990 and 15 of its 101 discretionary grantees in 1991. Furthermore, out of the 90 planned visits to various grantees and contractors in 1992, NCCAN plans to visit 2 of the 37 discretionary grantees it has funded so far. The number of visits is well below HHS's guidelines for on-site visits. Thus, staff and budget shortages will continue to limit its effectiveness in monitoring grants during 1992.

In our previous testimony, we reported that NCCAN had neither evaluated the quantity or quality of technical assistance provided nor surveyed the grantees on whether its technical assistance and training are adequate and timely. This has not changed. As part of our ongoing examination of NCCAN's program management, we will be asking the grantees to assess the technical assistance provided by NCCAN to identify ways that it could refocus its effort to better assist its grantees.

## CLEARINGHOUSE AND RESOURCE CENTERS

In our previous testimony, we reported that NCCAN was procuring a new contractor<sup>3</sup> to operate the National Clearinghouse on Child Abuse and Neglect and that the procurement process had been reinstated due to the filing of a bid protest. Since then, NCCAN obtained extensions of the contract from the previous clearinghouse contractor to prevent the disruption of services. The bid protest was resolved and a contractor was procured. To date, NCCAN has moved forward on program initiatives involving the management of the clearinghouse in conjunction with two resource centers, the National Resource Centers on Sexual Abuse and on Child Abuse and Neglect.

NCCAN has significantly increased their budget for the clearinghouse and has maintained a constant level of funding for the resource centers. In 1990, they allocated \$540,000 to administer clearinghouse operations, and in 1991, this allocation rose to over \$900,000. In 1992, NCCAN has budgeted \$850,000 for this operation. The clearinghouse is responsible for disseminating child abuse and neglect information and identifying potentially successful programs. The resource center budgets have remained constant at \$400,000 for each of the two resource centers, which are responsible for providing technical assistance

---

<sup>3</sup> NCCAN procured a contractor to operate two clearinghouses: the National Clearinghouse on Child Abuse and Neglect, which NCCAN manages, and the National Clearinghouse on Family Violence, which is managed by the Office of Community Services.



on the prevention, identification, and treatment of child abuse and neglect.

NCCAN has taken steps to promote closer working relationships between the clearinghouse and the resource centers. These steps have allowed NCCAN to better comply with the clearinghouse CAPTA mandate to disseminate child abuse and neglect information. In November 1991, NCCAN convened a meeting to coordinate resource center and clearinghouse plans. As a result, the clearinghouse and resource centers have agreed to share resources and publicize one another's activities at meetings and conferences. An outcome of this meeting was an increase in the clearinghouse mailing list from 3,805 to over 75,000.

While these efforts have improved the clearinghouse's ability to disseminate information, we question whether the CAPTA requirement that the clearinghouse identify potentially successful programs will be met. For instance, the clearinghouse's primary basis for determining successful programs is final reports produced by the grant recipients themselves. These reports have not been validated. Evaluation information contained in these self-prepared reports may be subject to natural bias. We believe the grant programs should be independently evaluated, so that NCCAN can identify those that are successful and disseminate this information through the clearinghouse. Once this process is completed, successful

programs can be highlighted in the clearinghouse's compendium of grant information. We are not sure when NCCAN will be able to accomplish this.

NATIONAL CHILD ABUSE AND NEGLECT DATA SYSTEM (NCANDS)

In our previous testimony, we reported that NCCAN planned to implement a CAPTA-mandated National Child Abuse and Neglect Data System to compile state information on cases of substantiated and unfounded child abuse and neglect and on deaths caused by child abuse and neglect. We reported that the system had been tested in nine states, which were to provide calendar year 1990 summary data to NCCAN in early fiscal year 1992. NCCAN has made progress on this effort, almost completing the collection of 1990 standardized summary data. The states were not required to participate in the national data system, but NCCAN secured the voluntary cooperation of 47 states, one territory, the District of Columbia, and the military services.

NCCAN plans to produce a series of working papers based on the collected data that will be distributed to every state and the clearinghouse by the end of March 1992. NCCAN also plans to test a pilot program for collecting detailed case data. In February, NCCAN began to survey states interested in participating in this more detailed collection effort and plans to incorporate this data collection into the system in 1993. It is too early to tell how effective this will be.

### CAPTA-MANDATED REPORTS

In our 1991 testimony, we reported that NCCAN had not submitted six of seven CAPTA-mandated reports to the Congress and that NCCAN said it would issue these reports no later than September 1991. Three of the reports are to examine the incidence of child abuse among handicapped children, alcoholics, and high-risk groups. The other reports are to examine (1) the coordination efforts of agencies and organizations responsible for child abuse and neglect programs and activities, (2) the effectiveness of programs assisted under the Victims of Crime Act, and (3) the relationship between nonpayment of child support and child maltreatment. While the reports have been drafted, they are still under ACYF, ACF, or HHS review. In July 1991, the HHS Chief of Staff notified the Speaker of the House that the reports would be delayed due to the extensive research required and a backlog of reports requiring HHS review. NCCAN could not provide us with a projected issue date for any of these reports.

### STAFF AND BUDGET RESOURCES

In May 1991, we reported that NCCAN staffing shortages were hampering NCCAN's ability to manage child abuse and neglect programs. At that time, NCCAN was authorized 21 positions and had 14 full-time staff and 7 unfilled positions. Since then, NCCAN's authorized staffing level has been reduced by 1, to 20 positions. Four of the 20 positions, all for professionals, remain unfilled. The others are filled by 16 permanent staff, 1

of whom is on detail elsewhere. NCCAN is attempting to compensate for the shortfall through the use of three detailees from other agencies and three temporary hires. Although NCCAN was able to hire four professional staff in late 1991, three replaced staff who had left. Despite these additions, NCCAN's staffing levels are still lower than in 1989, when NCCAN had 16 staff, including 14 professionals, to manage a smaller workload.

Earlier we also reported that an Office of Human Development Services' (OHDS) policy prohibited NCCAN from recruiting and hiring from outside OHDS. Today we can report that changes in this policy, adopted in April 1991, have enabled NCCAN to recruit and hire 4 professionals from nationwide Office of Personnel Management registers and added to its professional expertise.

In our previous testimony, we reported that NCCAN used grantees and contractors to provide technical assistance and training. NCCAN continues to use contractors to compensate for staff shortages. For example, NCCAN used a contractor to prepare a summary of final reports submitted by about 25 grantees that is to be disseminated through the clearinghouse. NCCAN's Director said that this function should be performed by NCCAN staff instead of a contractor. This would allow NCCAN to better accomplish its mandate to compile and disseminate meaningful information on child abuse and neglect. Dissemination of NCCAN-developed products also gives NCCAN visibility as a federal

leader in preventing and treating child abuse and neglect.

In May 1991, we reported that staff shortages contributed to heavy workloads for NCCAN staff. Staff shortages continue to contribute to heavy workloads. For example, one staff person is responsible for each of the following areas: (1) 108 state grants in 57 states and territories, liaison between NCCAN and 10 ACF regional offices, and legislative expert and researcher; (2) 47 challenge grants; and (3) 42 Children's Justice Act grants. Furthermore, NCCAN officials believe the agency needs at least 10 additional staff with expertise in (1) child protective services, (2) regulatory and legislative research, (3) design and research, (4) planning, (5) statistics, (6) data analysis, (7) technical writing, and (8) chronic neglect research. NCCAN staff also believe they need a deputy director to assist in the management of NCCAN programs and activities.

NCCAN's administrative budget continues to be disproportionately lower than its program budget. In fiscal year 1990, NCCAN received about \$750,000 to administer over \$39 million in grant programs, and in 1992, was allocated about \$945,000 to administer \$69.3 million in planned grant programs.

Earlier we reported that NCCAN requested authority to reprogram funds to hire a deputy director in 1991, but during the reorganization of ACF, this request was denied, and recently

NCCAN's staff authorization was reduced. Since NCCAN's grant responsibilities have increased, we believe that NCCAN will continue to be limited in its ability to effectively manage its grant workload.

NCCAN'S ROLE IN S. 838

S. 838 would establish a new Child Abuse Treatment Improvements Grant Program aimed at improving the treatment of children exposed to abuse or neglect and their families when such children have been placed in out-of-home care. NCCAN's grant administration responsibilities have increased over several years through successive CAPTA amendments, but its staff resources have not been sufficient to fulfill its responsibilities. If NCCAN is assigned S. 838's grant program, this would be in addition to the six major grant programs it already administers.

NCCAN's Director told us that if assigned responsibility for implementing S. 838's new grant program, NCCAN would attempt to secure additional expertise and would need (1) several additional staff to manage the grants, (2) space for additional staff, and (3) funds for travel to monitor grants. NCCAN told us it could manage the S. 838 grant program in coordination with the Children's Bureau, which is responsible for activities emphasized by S. 838.

Since NCCAN's administrative budget has not kept pace with its

increasing program responsibilities, and NCCAN has not been able to meet its CAPTA mandates with its current resources, we question whether NCCAN has the expertise and staff to assume a new grant program. At current resource levels, the additional responsibilities proposed by S. 838 could cause NCCAN to either further reduce its CAPTA grant administration activities or administer the new act less effectively than envisioned by Congress.

#### CONCLUSIONS

In our May 1991 testimony, we concluded that staff shortages kept NCCAN from fully carrying out its mission and CAPTA requirements and that if NCCAN programs were not given priority attention within the newly formed ACF, the Congress might wish to consider reducing its expectations for NCCAN or seeking other means for achieving CAPTA goals. Since then, NCCAN has made some progress in monitoring grant programs, managing the clearinghouse and resource centers, and obtaining additional staff and expertise. However, despite these encouraging actions, NCCAN's administrative effectiveness may not improve because of NCCAN's substantial and increasing workload. NCCAN continues to fall short in its ability to provide timely on-site monitoring, assess its technical assistance, and submit CAPTA-required reports to the Congress. We believe that NCCAN's limited resources continue to hinder its ability to accomplish its mission to become a leader in child abuse and neglect prevention and treatment.

- - - - -

Mr. Chairman, this concludes my prepared statement. I will be happy to answer any questions you or other members of the Subcommittee may have.