



United States
General Accounting Office
Washington, D.C. 20548

Health, Education and Human Services Division

B-261610

September 1, 1995

The Honorable John E. Porter
Chairman, Subcommittee on Labor,
Health and Human Services, and Education
Committee on Appropriations
House of Representatives

Dear Mr. Chairman:

This letter responds to your request for information on potential opportunities for consolidating programs in the Children and Families Services Programs (CFSP) budget account, administered by the Administration for Children and Families (ACF) in the Department of Health and Human Services (HHS). The CFSP account contained 29 grant programs in fiscal year 1994 aimed primarily at enhancing the well-being of the nation's disadvantaged or troubled children and families, with a total spending level of about \$4.7 billion.

More specifically, this letter contains information on (1) the CFSP budget account's programs and congressional and administration actions and other opportunities to consolidate the CFSP account's programs. As you requested, our identification of other consolidation opportunities did not include consideration of the account's largest program, Head Start, which spent about \$3.3 billion in fiscal year 1994.

To perform our work, we reviewed legislative and executive branch documents, interviewed ACF officials familiar with the CFSP account's programs, and undertook our own analysis of the programs with a view toward gaining an understanding of the commonalities and differences among the programs. We obtained much of the descriptive information from the Catalog of Federal Domestic Assistance for 1994 and the Budget of the United States Government, Fiscal Year 1996: Appendix. Our work was performed from March through July of 1995 in accordance with generally accepted government auditing standards.

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GAO/HEHS-95-191R Children and Families Services Programs

BACKGROUND

The 104th Congress has had an upsurge of interest in the subject of grant program consolidations. In response to this congressional interest, we recently issued reports on consolidation issues concerning welfare programs and employment training programs as well as using block grants as a consolidation approach.¹

In these reports, we concluded that several benefits can result from consolidations. When programs overlap or are duplicative, each with its own administrative staff and procedures, consolidation can lead to reduced administrative costs. Consolidations can also help agencies, employers, and target populations at the local level by reducing the confusing myriad of programs with similar but not identical application forms, services, and rules. Similarly, consolidations can overcome service gaps that exist when several narrowly defined programs exist, each with their own authorized services and target populations. Consolidations also can help overcome barriers to the development of needed management information systems--systems critical for ensuring accountability for program results and the proper use of funds. Administering agencies can be deterred from developing and maintaining up-to-date systems when they have to operate many small systems reflecting a wide variety of changing statutory and administrative requirements.

We also noted that proponents of block grants believe that this approach, combining many programs and extending to grantees discretion on how to spend the monies, can spur innovation at the state and local levels, reduce federal reporting requirements, and result in administrative savings.

However, we also concluded that consolidations are not without their challenges. Separate programs have their own supporters at all levels who may resist change. Furthermore, as the usual rules and reporting requirements are minimized in some consolidations, particularly block grant consolidations, it is especially important to focus on program results and outcomes so that policymakers can assess the efficiency and effectiveness of the grant programs.

¹Welfare Programs: Opportunities to Consolidate and Increase Program Efficiencies (GAO/HEHS-95-139, May 31, 1995); Multiple Employment Training Programs: Major Overhaul Needed to Create a More Efficient, Customer-Driven System (GAO/T-HEHS-95-70, Feb. 6, 1995); Block Grants: Characteristics, Experience, and Lessons Learned, (GAO/HEHS-95-74, Feb. 7, 1995); Program Consolidation: Budgetary Implications and Other Issues, (GAO/T-AIMD-95-145, May 23, 1995).

THE CFSP BUDGET ACCOUNT

The CFSP budget account is 1 of 10 budget accounts administered by ACF, and its 1994 spending level of \$4.7 billion ranked it the second largest, in dollar terms, of the 10 accounts. Enclosure 1 lists the 10 accounts and their 1994 obligations.

In addition, the account is the largest in the number of programs it funds. Whereas the other accounts typically fund 1 to 3 programs, in 1994 the CFSP account provided funding to 29 programs. Officials of ACF state that the account contains a large number of programs because, over the years, the account has been used as a kind of generic account into which were placed programs that did not fit well into other ACF accounts. Many of the other accounts have had fairly specific purposes.

As seen in table 1, the 1994 spending levels (actual obligations) for individual CFSP programs, excluding Head Start, ranged from about \$1.4 million for Child Development Associate Scholarships to about \$295 million for Child Welfare Services.

Table 1: Fiscal Year 1994 Direct Program Obligations for Children and Families Services

Dollars in thousands

Program	Dollars
1-Head Start	\$3,325,605
2-Child Development Associate Scholarships	\$1,372
3-Comprehensive Child Development Centers	\$46,560
4-Runaway and Homeless Youth	\$36,810
5-Runaway Youth Transitional Living	\$12,200
6-Runaway Youth Activities-Drugs	\$14,603
7-Child Abuse State Grants*	\$22,854
8-Child Abuse Discretionary Grants*	\$15,486
9-Community-Based Prevention Grants	\$5,270
10-Emergency Protection Grants	\$18,922
11-Abandoned Infants Assistance*	\$14,539
12-Dependent Care Grants	\$12,939
13-Temporary Child Care and Crisis Nurseries	\$11,912
14-Child Welfare Services	\$294,624
15-Child Welfare Training	\$4,439
16-Child Welfare Research and Demonstration	\$6,410
17-Adoption Opportunities*	\$12,116

18-Drug Abuse Preventions for Youth Gangs	\$10,620
19-Family Violence Grants	\$27,042
20-Social Services and Income Maintenance Research	\$13,370
21-Family Support Centers	\$7,362
22-Family Resource Centers	\$5,810
23-Developmental Disabilities (DD)-State Grants and Advocacy	\$93,096
24-DD-Special Projects and University-Affiliated Projects	\$21,995
25-Native American Programs	\$30,984
Subtotal Social Services	\$741,335
26-Community Services Block Grants	\$397,000
27-Community Services Emergency Services for the Homeless	\$19,840
28-Community Food and Nutrition	\$7,944
29-Community Services Discretionary	\$50,631
Subtotal Community Services	\$475,415
Administrative ^b	\$160,465
Reimbursable program ^c	18,514
Total obligations	\$4,721,334

^aAuthorizing legislation expires September 30, 1995. The administration has announced its intention to propose reauthorizing legislation.

^bIncludes ACF administration, White House Conference on Aging, Advisory Board for Child Abuse and Neglect, and Electronic Benefit Transfer Demonstration.

^cReimbursable program obligations are amounts financed from collections credited to the account (including reimbursements and repayments).

Sources: Budget of the United States Government, Fiscal Year 1996: Appendix (President's proposed fiscal year 1996 budget) and Justification of Estimates for Appropriations Committees Administration for Children and Families, Fiscal Year 1996, Department of Health and Human Services.

A wide variety of funding approaches, target populations, and financed services exists among the account's 29 programs.

Funding Approaches

The account's programs provide financial assistance primarily in the forms of project grants, formula grants, and grants to

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finance direct payments or loans to individuals. Seventeen of the programs make project grants. In these cases, the grant amounts are set by ACF officials after considering the size and needs of the projects, which normally run from 1 to 5 years. Project grant amounts (excluding Head Start grants) in 1994 ranged from a low of \$3,000 to a high of \$1.8 million.

Eight other programs make formula grants, usually to state agencies, for subsequent distribution to service providers. These grants are made on the basis of certain formulae prescribed by law or administrative regulation, such as state population under age 18. The smallest formula grant in 1994 was for \$118,000 while the largest was for \$35 million.

Another program makes grants to finance direct assistance to individuals, while three other programs each provide various combinations of project grants, formula grants, or grants to finance direct assistance to individuals.

Target Populations

The range of target populations covered by the CFSP account's programs is wide. Child populations that may be targeted by grants include the following:

- children age 3 and older;
- infants and toddlers under age 5;
- homeless youth under 18;
- abused and neglected or at-risk children;
- abandoned infants, especially those who are drug exposed;
- school-aged children;
- disabled youth;
- handicapped or chronically or terminally ill children;
- children with special needs;
- youth at risk of drug use and gang activity;
- children age 5 and older with developmental disabilities; and
- poor children, including migrants, farmworkers, and rural children.

Families that can be targeted include those

- of homeless youth under age 18;
- of runaway and homeless youth;
- of abused, neglected, or at-risk children;
- in low-income communities, especially those with young parents;
- of handicapped or chronically or terminally ill children;
- in need of child welfare services;
- with victims of family violence;
- who are homeless;

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- who are Native American;
- who are poor, especially migrants, farmworkers, and rural families; and
- with elderly members.

Financed Services

Services supported through the grants include

- health;
- education and training;
- nutrition;
- child care;
- parenting education;
- prenatal care;
- employment assistance;
- housing assistance;
- food and clothing;
- counseling;
- child abuse and neglect prevention;
- research, development, and demonstrations;
- technical assistance;
- temporary shelter;
- respite care;
- adoption services;
- drug abuse prevention;
- developmental screening; and
- tuition assistance.

Enclosures 2 through 9 show objectives, target population(s), services, funding type(s), and other pertinent information, including an identification of CFSP programs' budget activity codes and Catalog of Federal Domestic Assistance Codes, for the CFSP account programs.

CONSOLIDATION ACTIONS AND PROPOSALS

Table 2 depicts several consolidation actions and proposals: those enacted in the 103rd Congress by the Human Services Amendments of 1994 (P.L. 103-252); those proposed in the President's budget for fiscal year 1996; those set forth in this letter by us; and those proposed in a bill now before the Congress, H.R. 4.

Table 2: Children and Families Services Programs: Consolidations Enacted or Proposed

Program	P.L. 103-252		President's 1996 budget			GAO			H.R.4		
	1	2	1	2	3	1	2	3	1	2	3
Head Start											
Child Development Associate Scholarships			● ^a						● ^b		
Comprehensive Child Development Centers	● ^c										
Runaway and Homeless Youth				● ^d		● ^e					
Runaway Youth Transitional Living				● ^d		● ^e					
Runaway Youth Activities-Drugs				● ^d		● ^e					
Child Abuse State Grants										● ^f	
Child Abuse and Neglect Discretionary Grants										● ^f	
Community-Based Prevention		● ^g									
Emergency Protection Grants		● ^g									
Abandoned Infants Assistance							● ⁱ			● ^f	● ^h
Dependent Care Grants			● ^a						● ^b		
Temporary Child Care and Crisis Nurseries							● ⁱ			● ^f	
Child Welfare Services										● ^f	
Child Welfare Training										● ^f	
Child Welfare Research and Demonstration										● ^f	
Adoption Opportunities										● ^f	
Drug Abuse Preventions for Youth Gangs						● ^e					
Family Violence Grants								● ^j			
Social Services and Income Maintenance Research											
Family Support Centers		● ^g								● ^f	
Family Resource Centers		● ^g								● ^f	
Developmental Disabilities (DD)-State Grants and Advocacy											
DD-Special Projects and University-Affiliated Projects											
Native American Programs											
Community Services Block Grants											
Community Emergency Services for the Homeless						● ^e					
Community Food and Nutrition											
Community Services Discretionary					● ^k						
New and Proposed Programs											
Community-Based Family Resource Programs created by P.L. 103-252								● ^j		● ^f	
Comprehensive Runaway and Homeless Youth Program proposed by the administration											
Temporary Assistance for Needy Families Block proposed by H.R. 4											
Child Protection Block Grant proposed by H.R. 4											
Child Care Block Grant proposed by H.R. 4											

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Notes to table 2:

^aIn the president's proposed fiscal year 1996 budget, these programs are proposed for consolidation into the Child Care and Development Block Grant budget account, identification code 75-1515-0-1-609.

^bH.R. 4 proposes consolidating these programs into a block grant for child care.

^cIn fiscal year 1995, these programs were consolidated into the Head Start program by the Human Services Amendments of 1994, P.L. 103-252.

^dIn the president's proposed fiscal year 1996 budget, these programs are proposed for consolidation into the Comprehensive Runaway and Homeless Youth program. New authorizing legislation will be proposed.

^ePossible consolidation of Runaway Youth program with the Drug Abuse Preventions for Youth Gangs program and/or with the Community Emergency Services for the Homeless Block Grant.

^fH.R. 4 proposes consolidating these programs into a child protection block grant.

^gBy authority of the Human Services Amendments of 1994, these line items will be replaced by the newly authorized Community-Based Family Resource programs.

^hH.R. 4 proposes consolidating this program into a block grant for temporary assistance for needy families.

ⁱPossible consolidation of Abandoned Infants Assistance and Temporary Child Care and Crisis Nurseries.

^jPossible consolidation of Community Resource Centers and Family Violence Grants.

^kThe administration is proposing eliminating this program, funded under authority of section 681 (a) of the Community Services Block Grant Act.

Consolidations Enacted by Public Law 103-252

As shown in table 2, P.L. 103-252's consolidations affected 5 of the account's 29 programs. Four programs--Community-Based Prevention, Emergency Protection, Family Support Centers, and Family Resource Centers--were merged into the newly created Community-Based Family Resource program. The fifth affected

program, Child Development Centers, was consolidated with the existing Head Start program.

The Administration's Proposed Consolidations

The administration's budgets for fiscal years 1995 and 1996 proposed additional consolidations. Table 2 shows that these consolidations would affect six programs not previously consolidated. Two of the programs--Child Development Associate Scholarships and Dependent Care Grants--would be moved out of the CFSP budget account altogether and placed in another existing ACF budget account, the Child Care Development Block Grant account. Officials of the ACF stated that the two programs have the same primary target populations and many of the same grantees as programs under the Child Care Development Block Grant. Program officials believe that such a consolidation would help the grantees (mostly state human services agencies) provide more seamless child care for various populations, allow grantees to deal with a single source of federal funding, and decrease grantees' paperwork and administrative overhead.

A third program--the Community Services Discretionary program--would be eliminated, with future activities of this sort being funded through the account's existing Community Services Block Grants program.

Additionally, three programs for runaway youth would be merged into a new program in the CFSP account. The three programs--Runaway and Homeless Youth, Runaway Youth Transitional Living, and Runaway Youth Activities-Drugs--would be merged into a new Comprehensive Runaway and Homeless Youth program. ACF officials pointed out that the three programs are on the same funding cycle (annual), finance projects of the same duration (3 years), support similar services for the same target population, and most often use the same grantees. They stated that under a consolidation, annual award completions would number one rather than three, saving administrative time and expense. Officials also stated that consolidation would increase their ability to ensure continued services in the face of grantee turnover.

ACF officials further stated that consolidating the three programs for runaway youth would help service providers at the local level by simplifying their administrative tasks. Not having to prepare three separate grant applications to provide essentially the same services to the same population would free up time for exploring new and better ways to address runaway youth problems.

Further, ACF officials stated that the three programs for runaway youth, unlike the other programs in their consolidation proposal,

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are not suitable candidates for consolidation into block grants. They believe that runaway youth are a small and vulnerable population whose problems might not be adequately addressed through a nontargeted block grant program.

Table 3 shows the extent to which the six CFSP programs proposed for consolidation by the administration share similar target populations, objectives, activities, funding types, and award cycles.

Table 3: The Administration's Proposed Consolidations: Children and Families Services Programs

	Consolidation sets		
	Consolidated into the separate Child Care Development Block Grant account: -- Child Development Associate Scholarships -- Dependent Care Grants	Consolidated into a new Comprehensive Runaway and Homeless Youth program: -- Runaway and Homeless Youth -- Runaway Youth Transitional Living -- Runaway Youth Activities-Drugs	Consolidated into the Community Services Block Grant: --Community Services Discretionary Block Grant
Similar target populations	Potential child care providers and low-income families with children	Homeless youth and their families	Poor individuals
Similar objectives	Improve quality and availability of child care	Meet service needs of homeless youth and families	Impact poverty
Similar activities	Training and technical assistance	Shelter, counseling, education, and food	Education, housing, and employment assistance
Similar funding type	Formula grants	Project grants	Both block grants, but Community Services Discretionary Block Grant provides direct payments and has no formula

Similar project length	Not applicable	3 years	Community Services Discretionary Block Grant funds 2-, and 3- ear projects.
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ACF is not projecting any quantifiable administrative cost savings from the proposed consolidations. Officials told us that each program is small, and ACF's administration of them does not consume more than one-fourth to one-half of a full-time-equivalent employee per program. Officials told us all of the programs proposed for consolidation had been added to ACF's responsibility over the years without any additional staff to administer them.

Other Potential Candidates for Consolidation

In looking at other consolidation opportunities in the CFSP account, we identified nine programs that have similar target populations, objectives, activities, funding types, and award cycles. Programs with such similarities are obvious candidates for consolidation. Consolidations of such programs can reduce inefficiencies associated with overlapping or duplicative administration and services and can be implemented with relatively little disruption of existing services to target populations.

Three of the programs--Runaway and Homeless Youth, Runaway Youth Transitional Living, and Runaway Youth Activities-Drugs--could be combined, as in the Administration's proposal, on the basis of their shared features. However, other CFSP account programs share features with these three programs, suggesting the possibility of one or two larger consolidations involving the runaway youth programs. A somewhat larger consolidation would add to the three runaway youth programs a fourth program, the Drug Abuse Preventions for Youth Gangs program, while an even broader consolidation would combine these four programs into the existing Community Emergency Services for the Homeless Block Grant. The entries in table 4 show the commonalities among these five programs.

Table 4: Other Potential Candidates for Consolidation of Children and Families Services Programs

	Consolidation sets			
	Consolidated into one program: -- Runaway and Homeless Youth -- Runaway Youth Transitional Living -- Runaway Youth Activities-Drugs -- Drug Abuse Prevention for Youth Gangs	Consolidated into Emergency Community Services for the Homeless Block Grant: -- Runaway and Homeless Youth -- Runaway Youth Transitional Living -- Runaway Youth Activities-Drugs -- Drug Abuse Prevention for Youth Gangs	Consolidated into one program: -- Abandoned Infants Assistance -- Temporary Child Care/Crisis Nurseries	Consolidated into the new Community-Based Family Resource programs: -- Family Violence Grants -- Community-Based Prevention Grants
Similar target populations	Youth at risk of drug abuse	Homeless youth and families	Children with special needs (abused, at-risk, HIV, drugs, disabled, chronically ill)	Victims and perpetrators of child and family abuse
Similar objectives	Reduce and prevent drug abuse	Meet crisis/emergency needs	Provide residential care, address needs of children and families	Prevent violence, assist victims, prevent child abuse, provide family support
Similar activities	Service center for runaways and service demonstrations for youth gangs	Shelter, counseling, and service centers	Residential and respite care	Services, shelter, and education
Similar funding type	Service grants- 10%- or 25%- match required	Community service: formula; Runaways: match	Demonstration grants directly to infants' service providers; through states for nurseries	Formula grants through states to providers

Similar project length	Runaways: 3 yrs.; Youth gangs: 1-5 yrs.	Runaways: 3 yrs.; Community services: 1 yr.	Infants: 5 yrs.; Nurseries: 3 yrs.	Family violence: 1 yr.; community centers: 2 yrs.
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Also, the shared features of the Abandoned Infants Assistance program and the Temporary Child Care for Children With Disabilities and Crisis Nurseries program make them candidates for consolidation. As shown in table 4, both programs help children with special needs through demonstration grants for residential and respite care.

Finally, the Family Violence Grants program could be consolidated with the new Community-Based Family Resource Centers program created by Public Law 103-252, on the basis of the shared features identified in table 4.

The authorizing legislation for these programs and those proposed by the administration for consolidation may have to be amended to permit consolidation. Enclosure 10 identifies the authorizing legislation for each of these programs.

Consolidation Opportunities Beyond ACF and HHS

On the basis of on our earlier work, we also think opportunities may exist beyond the ACF for consolidating children and family programs, as well as other programs. On January 12, 1995, we testified that HHS warrants a comprehensive "scrub" of all its activities to eliminate, reduce, or consolidate programs.² We noted that HHS administers over 250 grant programs, many of which serve the same client populations, share common goals, and provide similar services. Moreover, eight federal offices within the Departments of Education and Labor also administer programs for children and their families.

The Proposed Consolidations of H.R. 4

The pending bill, H.R. 4, is another consolidation option for the CFSP account. As shown in table 2, the proposal would affect 14 of the CFSP account's programs, combining them, along with current programs outside the CFSP account, into three block grants. One of the new block grants for child care would combine the Child Development Associate Scholarships program and the Dependent Care Grants program with programs outside of the CFSP

²Health and Human Services: Opportunities to Realize Savings (GAO/T-HEHS-95-57, Jan. 12, 1995).

account. Another new block grant for temporary assistance for needy families would similarly combine the Emergency Protection Grants program with other non-CFSP account programs. The third block grant--for child protection--would combine the following 11 CFSP programs (with some non-CFSP programs):

- Child Abuse State Grants,
- Child Abuse and Neglect Discretionary Grants,
- Community-Based Prevention Grants,
- Abandoned Infants Assistance,
- Temporary Child Care and Crisis Nurseries,
- Child Welfare Services,
- Child Welfare Training,
- Child Welfare Research and Demonstration,
- Adoption Opportunities,
- Family Support Centers, and
- Family Resource Centers.

The consolidations of H.R. 4 would combine programs with a range of objectives and methods of assistance. For example, the block grant combining 11 programs would encompass programs delivering services (Child Abuse State Grants, Abandoned Infants Assistance, and so on) with programs providing training, research, and demonstration (Child Welfare Training and Child Welfare Research and Demonstration). Similarly, the block grant combining the Child Development Associate Scholarships program with the Dependent Care Grants program would include a program providing direct financial assistance to individuals (the former) with a program financing services (the latter).

Such broad, blocked consolidations could provide grant recipients considerable flexibility in using the monies. However, they would also raise certain issues not so apparent in consolidations of more similar programs, such as how to assess program success when more diverse objectives are included in the block grant. Also, as we have noted before, policymakers typically face complex funding allocation issues when combining several categorical grant programs with differing criteria for allocating funds among grantees.³

Enclosure 11 provides a list of most of GAO's reports related to program consolidation issues.

³See Block Grants: Lessons Learned (GAO/T-HEHS-95-80, Feb. 9, 1995).

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AGENCY COMMENTS

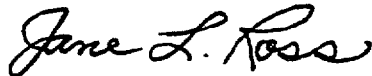
In commenting on this correspondence, ACF chose not to address the merits of individual consolidations we suggested. ACF did agree with our remarks on the complexity of issues raised by blocked consolidations and the need to carefully consider the impacts of individual consolidations on the populations served. A copy of ACF's comments is enclosed.

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We are sending copies of this correspondence to the Secretary of Health and Human Services and ACF and other interested parties. We will make copies available to others on request.

We hope that this information will be useful to you. Major contributors to this letter were Lynne Fender, Assistant Director, and Cathy Pardee, Evaluator-in-Charge. Please contact me on (202) 512-7215 if you or your staff have any questions.

Sincerely yours,



Jane L. Ross
Director, Income Security Issues

Enclosures - 12

BUDGET ACCOUNTS, NUMBER OF ASSOCIATED PROGRAMS, AND FISCAL YEAR
1994 DIRECT PROGRAM OBLIGATIONS FOR ACCOUNTS ADMINISTERED BY ACF

Dollars in thousands

Budget Account ^a	Programs	Obligations
Family Support Payments to States	2 ^b	\$16,903,339
Low-Income Home Energy Assistance	1	1,737,391
Refugee and Entrant Assistance	1	389,003
Family Preservation and Support	1	59,983
Job Opportunities and Basic Skills Training	1	872,978
State Legalization Impact Assistance Grants	1 ^c	811,901
Child Care and Development Block Grant	1	892,616
Social Services Block Grant	3 ^d	2,812,457
Children and Families Services	29	4,721,334
Foster Care and Adoption Assistance	3	2,987,594

^aTwo more accounts exist but do not represent additional program efforts: (1) payments to states from receipts for child support and (2) gifts and contributions. The child support enforcement program is included in the same budget account as AFDC.

^bIncludes AFDC and child support enforcement.

^cExpires June 29, 1995.

^dAlso includes earthquake supplemental and empowerment zones.

OBJECTIVES OF CHILDREN AND FAMILIES SERVICES PROGRAMS, FISCAL
YEAR 1994

Program	Objectives
Head Start	Help children achieve social competence through health, education, and social services, including nutrition
Child Development Associate Scholarships	Training and education; Certified Child Development Associates training, application, assessment, and credentialing
Comprehensive Child Development Centers	Enhance intellectual, social, emotional, and physical development of young children from low-income families and support their families
Runaway and Homeless Youth	Meet the immediate, critical needs of runaway and homeless youth and their families outside of legal, mental health, child welfare, and other systems by establishing and operating emergency centers to deliver needed services, communications system, research, development, and technical assistance
Runaway Youth Transitional Living	Provide residential care and services to homeless youth to help them achieve self-sufficiency
Runaway Youth Activities-Drugs	Prevent drug use among runaway and homeless youth through expanding and improving drug abuse education and prevention services
Child Abuse State Grants	Improve child abuse and neglect prevention activities
Child Abuse Discretionary Grants	Improve national, state, and local prevention, identification, and treatment of child abuse, especially sexual abuse, through research, demonstration, information, and technical assistance
Community-Based Prevention Grants	Assist states to develop, implement, or expand comprehensive statewide systems of community-based child abuse and neglect prevention activities

Emergency Protection Grants	Prevent child abuse and neglect by focusing on parents who are substance abusers and through emergency services to victims or children at risk of abuse
Abandoned Infants Assistance	Prevent abandonment of infants and young children; keep families together; conduct residential programs
Dependent Care Grants	Assist states in planning, developing, establishing, operating and improving before- and after-school care and resource referral
Temporary Child Care for Children With Disabilities and Crisis Nurseries	Alleviate social, emotional, and financial stress in families through temporary nonmedical care for sick, abused, handicapped, and at-risk children and families
Child Welfare Services	Strengthen state and local child welfare services; enable children to remain in own homes or provide alternative permanent homes
Child Welfare Training	Develop and maintain qualified personnel for children and family services through improving educational opportunities and providing training and education
Child Welfare Research and Demonstration	Support improvement of services for children
Adoption Opportunities	Facilitate the elimination of barriers to adoption and provide loving home environments for adopted children
Drug Abuse Preventions for Youth Gangs	Provide services to prevent and reduce youth involvement with drugs and gangs; support coordination of police, education, and other agencies; provide information on treatment options; provide technical assistance; and develop model approaches
Family Violence Grants	Assist states in preventing family violence, including elder abuse; provide shelter and assistance to victims, public awareness, research, and personnel training; increase coordination and cooperation among service providers

Social Services and Income Maintenance Research	Promote family self-sufficiency, child well-being, and development; foster innovative research, demonstrations, and evaluations; test new approaches; collect data; and replicate successes
Family Support Centers	Reduce homelessness; enhance living conditions and physical, social, and economic development of low-income children and families; promote self-sufficiency and literacy; and provide services
Family Resource Centers	Develop network of services, assist families before crises arise; enhance families' ability to stay together; reduce need for later, expensive services or public assistance
Developmental Disabilities (DD) State Grants and Advocacy	Foster independence, productivity, and integration of people with developmental disabilities; assist states' development of comprehensive coordinated systems
DD-Special Projects and University-Affiliated Projects	Support and identify innovative and model projects; implement leadership models; disseminate findings related to the provision of services to increase and support independence, productivity, and integration of people with developmental disabilities
Native American Programs	Promote social and economic self-sufficiency; development of local social, governance, and economic infrastructures; and preservation of native languages
Community Services Block Grants	Impact causes of poverty; assist low-income individuals with employment, housing, education, loans, and food; make service linkages
Community Services Emergency Services for the Homeless	Assist homeless, especially families and children, out of poverty; promote private-sector assistance
Community Food and Nutrition	Coordinate programs, identify sponsors, and develop new approaches
Community Services Discretionary	Alleviate causes of poverty; support activities for jobs, ownership, rural housing, water and water treatment, and education for youth

TARGET POPULATIONS OF CHILDREN AND FAMILIES SERVICES PROGRAMS,
FISCAL YEAR 1994

Program	Target populations
Head Start	Children age 3 and older, at least 10 percent having disabilities and 90 percent with family income below the poverty level
Child Development Associate Scholarships	Potential pre-school and day care providers
Comprehensive Child Development Centers	Infants, toddlers and preschoolers from low-income families and their parents
Runaway and Homeless Youth	Runaway and homeless youth under 18 and their families
Runaway Youth Transitional Living	Homeless youth ages 16-21
Runaway Youth Activities-Drugs	Runaway and homeless youth and their families
Child Abuse State Grants	Abused and neglected children under 18 and their families
Child Abuse Discretionary Grants	Abused and neglected children
Community-Based Prevention Grants	Children and families, especially in low-income communities; young parents; and young children
Emergency Protection Grants	Children abused or at-risk due to substance abuse of parents
Abandoned Infants Assistance	Abandoned infants and their caretakers, especially HIV- and drug-exposed infants
Dependent Care Grants	Dependent elderly, disabled, and school-age children

Temporary Child Care for Children With Disabilities and Crisis Nurseries	Abused, neglected, at-risk, handicapped, and chronically or terminally ill children and families
Child Welfare Services	Families and children in need
Child Welfare Training	Potential providers of child and family welfare services, institutions of higher learning, and welfare agencies
Child Welfare Research and Demonstration	Children and families
Adoption Opportunities	Children, especially with special needs and parties interested in their adoption
Drug Abuse Preventions for Youth Gangs	Youth at risk of illicit drug use and gang activity
Family Violence Grants	Victims of family violence
Social Services and Income Maintenance Research	Low-income individuals, children, youth, families, and people with developmental disabilities, including Native Americans
Family Support Centers	Homeless or previously homeless low-income families
Family Resource Centers	Families, especially in low-income communities, and young parents
Developmental Disabilities (DD) - State Grants and Advocacy	People 5 and older with developmental disabilities defined as severe, chronic, manifested before age 22, and likely to continue
DD-Special Projects and University-Affiliated Projects	People with developmental disabilities; state, local, public, nonprofit, and university-affiliated facilities

Native American Programs	American Indian tribes, Alaskan native village governments, and eligible Native American institutions, public and private organizations that serve American Indians and Alaskan natives, native Hawaiians, and other Pacific Islanders
Community Services Block Grants	Poor individuals and families and nonprofit antipoverty agencies
Community Services Emergency Services for the Homeless	Homeless (or about to be) families, especially elderly, handicapped, veterans and Indians
Community Food and Nutrition	Low-income (100% of poverty line) individuals, children, and families
Community Services Discretionary	Low income (125% of poverty line) individuals, including migrants and farmworkers, people in rural areas, and youth

ACTIVITIES OR SERVICES SUPPORTED BY CHILDREN AND FAMILIES
SERVICES PROGRAMS, FISCAL YEAR 1994

Program	Activities
Head Start	Health, education, nutrition, social, and other services
Child Development Associate Scholarships	Training and education
Comprehensive Child Development Centers	Health and child care, early childhood and parenting education, prenatal care, employment counseling and training, nutritional and housing assistance
Runaway and Homeless Youth	Emergency shelter, clothing, counseling, referrals; home-based services for those at risk of separation from family
Runaway Youth Transitional Living	Residential care and services for 18 months that includes information and counseling in basic life skills, interpersonal skill building, education, health care, job preparation, and training
Runaway Youth Activities-Drugs	Group, individual, family, and peer counseling, outreach, community education, training, and coordination of services
Child Abuse State Grants	Identification, prevention, and treatment; education of law enforcement and judicial staff; hotlines; case management; self-help groups; public awareness information; volunteer recruitment; and training
Child Abuse Discretionary Grants	Research, demonstration, and service improvement grants supporting graduate research fellowships, national data collection systems, information dissemination, training, technical assistance, and program evaluation

Community-Based Prevention Grants	Broad range of abuse and neglect prevention activities, including education, support, developmental screening, outreach, follow-up, early care, respite, literacy, counseling, crisis intervention, and referrals
Emergency Protection Grants	Emergency services; delivery and training models; hiring of personnel to reduce caseloads
Abandoned Infants Assistance	Residential programs, respite care, recruiting and training of foster families, service demonstrations, and provider training
Dependent Care Grants	Before- and after-school child care and dependent care resource referral
Temporary Child Care for Children With Disabilities and Crisis Nurseries	Temporary, nonmedical care, and crisis nurseries; referral support, technical assistance, and respite
Child Welfare Services	Protective services, licensing and standard setting, homemaker services, return of runaways, prevention, and reunification services
Child Welfare Training	Training, education, partnerships between welfare agencies and schools, stipends, and staff development
Child Welfare Research and Demonstration	Child welfare resource centers, demonstrations to test interventions, specialized foster care, day treatment, services to homeless families, and staff turnover
Adoption Opportunities	National adoption information exchange, clearinghouse, and resource center; training and technical assistance to state, local, and private agencies; special needs curriculum; and postlegal adoption services
Drug Abuse Preventions for Youth Gangs	Community development, mentoring, tutoring, recreational activities, family support efforts, and research

Family Violence Grants	Shelter and related assistance, prevention assistance, counseling, advocacy, self-help; national and special issue resource centers, personnel training, technical assistance, and research
Social Services and Income Maintenance Research	Research, demonstrations, and evaluations addressing AFDC, JOBS, child support, Head Start, specialized family foster care, juvenile sex offenders, use of correctional facilities, child support, and teen pregnancy
Family Support Centers	Comprehensive support services
Family Resource Centers	Comprehensive services, including education, support, parenting, developmental screening, outreach, referral, follow-up, and child care
Developmental Disabilities (DD) - State Grants and Advocacy	Assist states to develop plans, build capacity, refocus existing services, provide legal advocacy, and coordinate services
DD-Special Projects and University-Affiliated Projects	Provide technical assistance, data systems collection and referral systems support, and educate policymakers
Native American Programs	Projects for governance, social and economic development strategies, environmental regulatory enhancement, and preservation of native languages
Community Services Block Grants	Assistance to secure employment, education, housing, loans, food, and coordination of service delivery
Community Services Emergency Services for the Homeless	Follow-up and long-term services, renovation of buildings, and violence counseling
Community Food and Nutrition	Food assistance, child nutrition programs, outreach, and education

Community Services Discretionary	Projects of national and regional significance to support activities for jobs, homeownership, rural housing, water and water treatment, education, and recreation for youth
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PROJECT PERIODS OF CHILDREN AND FAMILIES SERVICES PROGRAMS GRANTS,
FISCAL YEAR 1994

Program name	Project periods
Head Start	1 year
Child Development Associate Scholarships	not available
Comprehensive Child Development Centers	5 years--annual renewal
Runaway and Homeless Youth	3 years
Runaway Youth Transitional Living	3 years
Runaway Youth Activities-Drugs	3 years
Child Abuse State Grants	2 years
Child Abuse Discretionary Grants	1-3 years with possible renewal for 5 years
Community-Based Prevention Grants	2 years
Emergency Protection Grants	17 months
Abandoned Infants Assistance	5 years
Dependent Care Grants	2 years
Temporary Child Care for Children With Disabilities and Crisis Nurseries	1 or more years
Child Welfare Services	Quarterly
Child Welfare Training	Varies
Child Welfare Research and Demonstration	Varies
Adoption Opportunities	1-5 years
Drug Abuse Preventions for Youth Gangs	1-5 years
Family Violence Grants	1 year
Social Services and Income Maintenance Research	1-3 years
Family Support Centers	2 years
Family Resource Centers	3 years

Developmental Disabilities (DD)-State Grants and Advocacy	1-year/3-year plans
DD-Special Projects and University-Affiliated Projects	1 year (univ.); varies (special)
Native American Programs	1-3 years
Community Services Block Grants	1 year
Community Services Emergency Services for the Homeless	1 year
Community Food and Nutrition	1 year
Community Services Discretionary	1-3 years

FUNDING TYPES THROUGH CHILDREN AND FAMILIES SERVICES PROGRAMS,
FISCAL YEAR 1994

Program name	Funding types
Head Start	Project grants--20% match cash or in-kind
Child Development Associate Scholarships	Formula grants--states' total populations, 35% training for credentialing, 10% administration, 55% to economically eligible candidates
Comprehensive Child Development Centers	Project grants--20% nonfederal share
Runaway and Homeless Youth	Service grants--10% cash or in-kind match; formula--states' population under 18
Runaway Youth Transitional Living	Service grants--10% match required
Runaway Youth Activities-Drugs	Service grants--25% nonfederal cash or in-kind contributions required
Child Abuse State Grants	Formula grants, states' population under 18
Child Abuse Discretionary Grants	Project grants (contracts); match requirements in announcements
Community-Based Prevention Grants	Formula grants--50% of funds based on population under 18; other 50% based on 25% of collections for states' children's trust fund for the prior year
Emergency Protection Grants	Project grants--match requirements differ by program announcement
Abandoned Infants Assistance	Project grants--10% sharing total project cost
Dependent Care Grants	Formula grants--25% match required: 40% for resource, referral systems; 60% for school-age child care

Temporary Child Care for Children With Disabilities and Crisis Nurseries	Project grants--50% of appropriation for child care, 50% for nurseries; limit of 5% of administrative costs; 25% match sometimes required
Child Welfare Services	Formula grants--child population, per capita income, 25% match requirement, incentive funds available
Child Welfare Training	Project grants, sometimes administratively required matching
Child Welfare Research and Demonstration	Project grants--match specified by program announcement, cash, or in-kind.
Adoption Opportunities	Project grants and contracts--sometimes administratively required matching
Drug Abuse Preventions for Youth Gangs	Service grants--25% nonfederal match of cash or in-kind contributions
Family Violence Grants	Formula and project grants--no less than 70% immediate shelter and assistance; not less than 25% related assistance
Social Services and Income Maintenance Research	Project grants, cooperative agreements, contracts, 25% cost-sharing grants and agreements
Family Support Centers	Project grants--no match requirement
Family Resource Centers	Project grants--20%
Developmental Disabilities (DD)-State Grants and Advocacy	Formula grants--2/3 overall population, 1/3 child disability program beneficiaries; federal share not to exceed 75% (90% in rural or urban poverty areas)
DD-Special Projects and University Affiliated Projects	Project grants and contracts; federal share of university project may not exceed 75% of total costs

Native American Programs	Project grants, technical assistance contracts, revolving loan fund; 20% match and maintenance of effort requirements
Community Services Block Grants	Formula grants--no match requirements; 1/2 of 1% for territories and insular areas
Community Services Emergency Services for the Homeless	Formula grants--not less than 1.5% set-aside for Indians; not more than 25% prevent homelessness; not more than 5% state administrative expenses; no match requirement
Community Food and Nutrition	Formula grants and direct competitive payments: 60% (formula) and 40% (direct competitive) to low-income and unemployed populations; no match requirement
Community Services Discretionary	Direct payments--no formula or match requirements

RANGE AND/OR AVERAGE SIZE OF FINANCIAL ASSISTANCE PROVIDED
THROUGH CHILDREN AND FAMILIES SERVICES PROGRAMS, FISCAL YEAR 1994

Dollars in thousands

Program name	Range/average size
Head Start	\$80-\$92,000/\$1,900
Child Development Associate Scholarships	\$3-\$161
Comprehensive Child Development Centers	\$800-\$1,800 (federal share)
Runaway and Homeless Youth	\$25-\$200/\$90
Runaway Youth Transitional Living	\$55-\$200/\$155
Runaway Youth Activities-Drugs	\$36-\$100/\$85
Child Abuse State Grants	\$62-\$2,637
Child Abuse Discretionary Grants	\$10-\$500
Community-Based Prevention Grants	\$32-\$556
Emergency Protection Grants	\$200-\$500
Abandoned Infants Assistance	Up to \$450
Dependent Care Grants	\$50-\$1,500
Temporary Child Care for Children With Disabilities and Crisis Nurseries	Unavailable
Child Welfare Services	\$118-\$21,000/\$4,300
Child Welfare Training	\$75 ave.
Child Welfare Research and Demonstration	\$40-\$500/\$250
Adoption Opportunities	\$50-\$400
Drug Abuse Preventions for Youth Gangs	\$50-\$750
Family Violence Grants	\$178-\$1,800 (states); \$14-\$110 (Indian tribes)

Social Services and Income Maintenance Research	\$30-\$1,000
Family Support Centers	\$150-\$250
Family Resource Centers	Three grants-\$1,500 each
Developmental Disabilities (DD)-State Grants and Advocacy	\$350
DD-Special Projects and University-Affiliated Projects	Special: \$75-\$200 University: \$150-\$350 Average: \$200; Training: max. \$90
Native American Programs	\$30-\$1,200
Community Services Block Grants	\$2,000-\$35,000
Community Services Emergency Services for the Homeless	Unavailable
Community Food and Nutrition	\$389-\$143/\$27 (formula) \$25-\$50/\$33 (direct grants)
Community Services Discretionary	\$50-\$800/\$350

ACF OFFICES ADMINISTERING CHILDREN AND FAMILIES SERVICES PROGRAMS

Program name	ACF office
Head Start Child Development Associate Scholarships Comprehensive Child Development Centers	Head Start Bureau, Administration for Children, Youth and Families (ACYF)
Runaway and Homeless Youth Runaway Youth Activities-Drugs Runaway Youth Transitional Living Drug Abuse Preventions for Youth Gangs Family Resource Centers	Family and Youth Services Bureau, ACYF
Child Abuse State Grants Child Abuse Discretionary Grants Community-Based Prevention Grants Emergency Protection Grants	National Center on Child Abuse and Neglect, ACYF
Abandoned Infants Assistance Dependent Care Grants Temporary Child Care for Children With Disabilities and Crisis Nurseries Child Welfare Services Child Welfare Research and Demonstration Adoption Opportunities	Children's Bureau, ACYF
Developmental Disabilities -- State Grants and Advocacy -- Special Projects and University-Affiliated Projects	Administration for Developmental Disabilities
Native American Programs	Administration for Native Americans
Social Services and Income Maintenance Research	Office of Policy and Evaluation

Family Violence Grants Family Support Centers Grants Community Services Block Grants Community Services Emergency Services for the Homeless Community Food and Nutrition Community Services Discretionary	Office of Community Services
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BUDGET ACTIVITY AND CATALOG OF FEDERAL DOMESTIC
ASSISTANCE IDENTIFICATION CODES FOR CHILDREN
AND FAMILIES SERVICES PROGRAMS--BUDGET
ACCOUNT 75-1536-0-1-506

Program name	Budget code	Catalog code
Head Start	00.01	93.600
Child Development Associate Scholarships	01.01	93.614
Comprehensive Child Development Centers	01.02	93.666
Runaway and Homeless Youth	01.03	93.623
Runaway Youth Transitional Living	01.04	93.550
Runaway Youth Activities-Drugs	01.05	93.657
Comprehensive Runaway and Homeless Youth	01.06	NA
Child Abuse State Grants	01.07	93.669
Child Abuse Discretionary Grants	01.08	93.670
Community-Based Prevention Grants	01.09	93.672
Emergency Protection Grants	01.10	93.554
Abandoned Infants Assistance	01.11	93.551
Dependent Care Grants	01.12	93.673
Temporary Child Care for Children With Disabilities and Crisis Nurseries	01.13	93.656
Child Welfare Services	01.14	93.645
Child Welfare Training	01.15	93.648
Child Welfare Research and Demonstration	01.16	93.608
Adoption Opportunities	01.17	93.652
Drug Abuse Preventions for Youth Gangs	01.18	93.660
Family Violence Grants	01.19	93.671
Social Services and Income Maintenance Research	01.20	93.647
Family Support Centers	01.21	93.578

Family Resource Centers	01.22	93.580
Developmental Disabilities (DD)-State Grants and Advocacy	01.23	93.630
DD-Special and University-Affiliated Projects	01.24	93.631/2
Native American Programs	01.25	93.612
Community Services Block Grants	03.01	93.569
Community Emergency Services for the Homeless	03.02	93.572
Community Food and Nutrition	03.03	93.571
Community Services Discretionary	03.04	93.570

AUTHORIZING LEGISLATION FOR SELECTED CHILDREN AND FAMILIES
SERVICES PROGRAMS PROPOSED FOR CONSOLIDATION

Program	Legislation
Runaway and Homeless Youth	Section 385(a) (1) of the Runaway and Homeless Youth Act, as amended
Runaway Youth Transitional Living	Section 385(b) of the Runaway and Homeless Youth Act
Runaway Youth Activities-Drugs	Section 3513 of the Anti-Drug Abuse Act of 1988, as amended
Community-Based Prevention Grants	Repealed in the Human Services Amendments of 1994
Abandoned Infants Assistance	Section 104(a) of the abandoned Infants Assistance Act of 1988 as amended, expires September 30, 1995
Temporary Child Care for Children With Disabilities and Crisis Nurseries	Section 206 of the Temporary Child Care and Children With Disabilities and Crisis Nurseries Act of 1986, as amended, expires September 30, 1995
Drug Abuse Prevention for Youth Gangs	Section 3505 of the Anti-Drug Abuse Act of 1988, as amended
Family Violence Grants	Sections 310 and 311(g) of the Family Violence Prevention and Services Act, as amended
Community Emergency Services for the Homeless	Section 754 of Title VII, Subtitle D, of the Stewart B. McKinney Homeless Assistance Act, as amended
Child Development Associate Scholarships	Section 606 of the Child Development Associate Scholarship Assistance Act of 1985, as amended
Dependent Care Grants	Section 670A of the State Dependent Care Grants Act, as amended

RELATED GAO PRODUCTS

Federal Reorganization: Congressional Proposal to Merge Education, Labor, and EEOC (GAO/HEHS-95-140, June 7, 1995).

Welfare Programs: Opportunities to Consolidate and Increase Program Efficiencies (GAO/HEHS-95-139, May 31, 1995).

Program Consolidation: Budgetary Implications and Other Issues (GAO/T-AIMD-95-145, May 23, 1995).

Department of Education: Information on Consolidation Opportunities and Student Aid (GAO/T-HEHS-95-130, Apr. 6, 1995).

Means-Tested Programs (GAO/HEHS-95-94R, Feb. 24, 1995).

Community Development: Comprehensive Approaches Address Multiple Needs but Are Challenging to Implement (GAO/RCED/HEHS-95-69, Feb. 8, 1995).

Block Grants: Characteristics, Experience, and Lessons Learned (GAO/HEHS-95-74, Feb. 7, 1995).

Block Grants: Lessons Learned (GAO/T-HEHS-95-80, Feb. 9, 1995).

Means-Tested Programs: An Overview, Problems, and Issues (GAO/T-HEHS-95-76, Feb. 7, 1995).

Multiple Employment Training Programs: Major Overhaul Needed to Create a More Efficient, Customer-Driven System (GAO/T-HEHS-95-70, Feb. 6, 1995).

Multiple Youth Programs (GAO/HEHS-95-60R, Jan. 19, 1995).

Health and Human Services: Opportunities to Realize Savings (GAO/T-HEHS-95-57, Jan. 12, 1995).

Federally Funded Health Services: Information on Seven Programs Serving Low-Income Women and Children (GAO/HRD-92-73FS, May 28, 1992).

Multiple Teacher Training Programs: Information on Budget, Services, and Target Groups (GAO/HEHS-95-71FS, Feb. 22, 1995).

Food Assistance: USDA's Multiprogram Approach (GAO/RCED-94-33, Nov. 29, 1993).

Early Childhood Programs: Multiple Programs and Overlapping Target Groups (GAO/HEHS-95-4FS, Oct. 31, 1994).

ENCLOSURE 11

ENCLOSURE 11

Multiple Employment Training Programs: Overlap Among Programs Raises Questions About Efficiency (GAO/HEHS-94-193, July 11, 1994).

Multiple Employment Training Programs: Major Overhaul Is Needed (GAO/T-HEHS-94-109, Mar. 3, 1994).

Multiple Employment Training Programs: Overlapping Programs Can Add Unnecessary Administrative Costs (GAO/HEHS-94-80, Jan. 28, 1994).

COMMENTS FROM THE DEPARTMENT OF HEALTH AND HUMAN SERVICES

DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES

Office of the Assistant Secretary, Suite 600
370 L'Enfant Promenade, S.W.
Washington, D.C. 20447

August 18, 1995

Ms. Jane L. Ross
Director, Income Security Issues
United States General Accounting Office
Washington, D.C. 20548

Dear Ms. Ross:

This is in response to your letter dated August 1, 1995, requesting the Administration for Children and Families to review and provide comments on the General Accounting Office's (GAO's) draft correspondence on, "Children and Families Services Programs" (GAO/HEHS-95-191R).

The report presented in the draft correspondence is based upon three groups of proposed program consolidations: 1) those proposed by the President in the FY 96 Budget, 2) those proposed by the House of Representatives in H.R.4, and 3) those suggested by GAO as a result of this review.

With regard to those consolidations proposed in the President's FY 96 Budget, we concur with those program consolidations.


With regard to those consolidations proposed in the Child Protection Block Grant passed by the House in HR4, we strongly disagree. The House proposal ends the focus on prevention and eliminates the basic protection for children in care, such as requiring that reasonable efforts be made to preserve the family, periodic reviews of children placed in foster care, permanency planning determinations and case plan requirements. Courts in 22 States and the District of Columbia have found that the child welfare system violates State and Federal laws designed to protect abused and neglected children. The simple grouping of programs that appear to serve similar populations without regard to the consequences on those being served is the wrong approach to take. Consequently, we agree with GAO comments that 1) blocked consolidations raise certain issues not so apparent in consolidations of more similar programs, such as how to assess program success when more diverse objectives are included in the block grant; and 2) that policymakers typically face complex funding allocation issues when combining several categorical grant programs with differing criteria for allocating funds among grantees.

Page 2 - Ms. Jane L. Ross

Finally, with regard to GAO suggestions for additional consolidations, we find them interesting, but advise caution in pursuing any consolidations without looking very carefully at the intended purpose of the program and the effects consolidation may have on that purpose and the people being served by any of those programs.

Thank you for the opportunity to comment.

Sincerely,


for Mary Jo Bane
Assistant Secretary
for Children and Families

(105929)

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