| OCTOBER 2016 | CSD PERSPECTIVE 16-46 |

Policy Innovation for Children and Families

Mark H. Greenberga

I greatly appreciate being able to join you today. In my comments this morning, I want to do three things: talk about why this effort is important, offer observations on several of the grand challenges, and share some thoughts about how your engagement can help in advancing a social policy agenda and in addressing the grand challenges of our time.

Before doing so, I'll say a few words about my background and work, and how that fits with my comments. As you heard in the intro, I spent my first 10 years out of law school as a legal aid lawyer and then spent the next 20 years in DC seeking to affect federal, state, and local policy and practice. Since 2009, I've been at the Administration for Children and Families (ACF) as part of the Obama administration, and for the last 3 years, I've been ACF's Acting Assistant Secretary. ACF has federal responsibility for a number of important programs principally affecting low-income children, families, and communities. They include Head Start and Temporary Assistance for Needy Families, as well as programs related to child care, child welfare, child support, unaccompanied children, refugee resettlement, runaway and homeless youth, domestic violence, Native American youth, and more.

So, I think my relevant credentials for this talk are that, in my career, I've spent more than 30 years working to encourage governments to do more to address a number of the grand challenges you've identified, and I've spent the last 7 years in the federal government

working to strengthen programs and improve the effectiveness of government.

To begin, I think your effort is important because it's precisely what academia, policymakers, and practitioners should be doing more of: coming together to identify grand challenges, help people understand them, and help point the way to solutions. You're well positioned to do this because you can look at historical trends over time, you can see where the United States is and isn't distinctive among nations, you have or have the capacity to have—a comprehensive awareness of relevant research, you can generate research to fill gaps and holes, you have the capacity to blend insights from research with insights from practice, and you needn't be constrained by the restrictions of partisan politics or what's currently popular. And the social work profession brings a set of values and perspectives that can help ensure that you're focusing on the most important questions for bringing about a better society.

I also think it's important that your initiative seeks to tie analysis of problems to recommendations for solutions. Too often, we have broadly shared recognition that something is a problem, but the recognition is combined with a belief that the problem isn't solvable—that it'll always be with us, or that any effort on the part of government will fail or backfire. To move forward, it's crucial that we strengthen a shared understanding of how we can come to solutions.

I appreciate that the part about focusing on solutions may be less comfortable for some

^aThis Perspective presents remarks delivered by Acting Assistant Secretary Greenberg during Social Innovation for America's Renewal, a September 2016 policy conference of the Grand Challenges for Social Work initiative. The conference was organized by the Center for Social Development at Washington University in collaboration with the American Academy of Social Work & Social Welfare.



in academia, for a number of very legitimate reasons; sometimes the research principally points to the need for more research, or doesn't point to particular solutions, or calls for considerations beyond one's strongest areas of expertise, or makes research appear political, or presents concerns that going beyond what the research shows may risk the credibility of the research itself. I think these are all fair points, and I'll return to this question later. But I want to emphasize that there's no shortage of people identifying problems in our country; we do have a shortage of a shared belief in the ability to address them, and that's why it is so important to tie the challenges to the development of solutions.

In the next few minutes, I'll comment on three of the briefs: those on ending homelessness, ending family violence, and building financial capability and assets for all (Huang et al., 2016; Kulkarni et al., 2016; Padgett, Henwood, & Culhane, 2016). I opted for three because I didn't want to flit from one to the next and I wanted to focus on areas that closely connect to our work at ACF. But, I hope the approach can help in your consideration of next steps for other briefs too.

First, I commend you for including these three. I congratulate you for working to figure out the key points to get across in two pages, and for avoiding the temptation to list the 40 or 50 things that are most important to do. I say this as someone who directed a task force that sought to identify 12 steps to cut poverty in half; we very much wanted to have more than 12, but we got strong and, I think, good advice that nobody wants a very long list—that we needed to recognize that not all are equal and to point to what seemed most central. At the same time, if you've got a small number of recommendations in an area, I do think it's helpful to clarify the organizing principle: adopting the three would solve the problem, or they're the three most important things to do, or they're a mix of aspirational and attainable approaches, or some other guiding principle. I got some insight into your guiding principles listening to the remarks last night, and I think there's a virtue in making those very explicit.

I also want to acknowledge a tension that arises whenever one puts forward something very short. On one hand, we're in a world where few people want to read something long. But, it's also true

that, typically, a policymaker doesn't just want you to say "this is a problem, and here's what you should do." It helps to also provide some insight into the nature, extent, and causes of the problem; why is your proposed solution a good fit in light of our understanding of the problem, what's the evidence in support of it, what might the proposed solution cost, and to what extent will it address the problem, and what other considerations does the policymaker need to weigh in deciding whether to adopt it. And to the extent that you can clarify who it's a recommendation to, that's helpful too—that is, to Congress, the administration, the federal government, state/local governments, the public, or others. I also noted that some (but not all) papers specifically call out implications for social work practice, and there's a clear virtue in doing that whenever appropriate.

So, I'd encourage looking closely at what might make these more informative and persuasive without getting to excessive length. I heard last night about the importance of drawing on communications professionals, and I'd say that very much depends on your audience. I think accessibility is always good, but if you're trying to reach a policymaker who isn't convinced that homelessness needs to be addressed, what you'll need to communicate is quite different than if you're engaging one that agrees with the challenge and just wants to focus on potential solutions.

A number of the recommendations highlight the importance of evidence-based practices. I agree with this focus, and as you probably hear often, this is a strongly evidence-based administration. At ACF, we've taken a number of steps to strengthen our commitment to using research, improving use of data, enhancing staff understanding of evaluation principles, and being a learning organization.

Having said this, I also want to flag a caution. I think it's often not helpful to divide the world into that which is evidence based and that which isn't. Sometimes research unequivocally demonstrates that a program had no impact or that its costs clearly outweighed its benefits, and the clear implication is we need to stop doing whatever that was. But lots of research isn't like that. A program or strategy may have had some impact for some groups in some settings. If that's

what we see, our response shouldn't necessarily be "it's evidence-based, let's replicate it." And we shouldn't tell administrators they can only do the thing that was evaluated and had an impact. That shouldn't be our response because even if there was an impact, it may or may not have been large, we may or may not have confidence about what caused the impact, and there may be challenges of replicability—particularly in different contexts or with different populations. Even when we are confident that we've seen a sizeable impact and know why, we're still not at the end point of knowledge and it may be possible to do better. So, I think we always need to ask how any set of findings contributes to our overall efforts to strengthen the effectiveness of programs, and not just divide the world into things that are and aren't evidence based.

We also need to ensure that being evidence based is not the enemy of innovation. Only a small fraction of the questions policy officials and administrators face each day can be answered by research findings, and the research almost never answers a policy question completely and unequivocally. In fact, much of our status quo isn't evidence based, and we shouldn't place unreasonable evidence burdens on advocates for change. Therefore, I'd emphasize the need to balance recommendations so that they reflect the importance of building evidence bases in a way that supports both needed flexibility and innovation. I think academics can play a key role in encouraging a more balanced and realistic discussion of what it means to be evidence based, and I encourage you to do so in this effort.

I turn now to some specifics. As to homelessness, our administration shares the goal of ending homelessness in America, and we've worked closely with colleagues in other federal agencies on this effort. Homelessness for families is often associated with family separations, poor health, exposure to violence, and stress. For children—particularly young children—it is associated with school moves and absences; academic delays; and social, emotional, and behavioral problems.

One major reason for homelessness is the gulf between family income and rents. Most poor renting families spend at least half of their incomes on housing costs, and I commend you for highlighting the need to expand housing subsidies. The president's 2017 budget doesn't go as far as your proposal, but it does propose \$11 billion over 10 years to end family homelessness by 2020 (Office of Management and Budget, 2016, p. 54). The proposed spending for vouchers is based on research that found that families who utilized vouchers—compared with families using alternative forms of assistance—had fewer incidents of homelessness, fewer child separations, fewer school moves, less intimate partner violence, less food insecurity, and generally less economic stress.

I also agree that evidence-based psychosocial interventions are not needed in all cases, but it's important that they be available when needed. We've placed a major emphasis on improving coordination between housing and other, federally funded benefits and services. However, in a constrained budget environment, we've largely needed to focus on improved coordination rather than increased funding for services. If you feel able to say more about who needs what services when and about where more needs to be done to build the evidence base, that would be helpful. Also, we've been very actively engaged in efforts to better understand the applicability of the work around trauma and stress for both homeless services and for human services in general; your perspectives on implications for practice would be valuable.

I also commend the recognition of the need for distinct interventions for distinct populations and encourage more discussion of what's appropriate for whom. We know that domestic violence is a significant contributor to homelessness among families and that most children in HUD shelters are under the age of 6. In our work, we've placed significant emphasis on addressing the needs of domestic violence survivors and families with young children. We recognize both the service gaps and the evidence-building needs.

We also know that much of youth homelessness concerns family relationships: Our recently released street outreach study found that more than half of homeless youth become homeless for the first time because they are asked to leave home by a parent or caregiver (Administration for Children & Families, 2016). We also know that many youth leave home due to their sexual orientation or gender identity, and that many homeless youth were involved in the foster care system. We've asked Congress for demonstration

funding to focus efforts to prevent youth homelessness by reducing family conflict and improving family cohesion and communication. We've funded a demonstration to test models of housing and services interventions for LGTBQ youth and youth who have aged out of foster care. We're wrapping up a research project on best practices and screening tools to effectively serve LGBTQ homeless youth. And, we're funding a supportive housing demonstration in five sites to test the effectiveness of supportive housing as a strategy for reducing family separation due to the lack of adequate housing (Cunningham et al., 2014).

Note that a lot of what I've described involves demonstration projects and efforts of limited scale—a key question for you involves where we need to build research and evidence and where we know enough to operate at larger scale. A broad cross-cutting challenge for your effort is that here, and in virtually every aspect of our work, we'd benefit from more research. But that'll always be true, and it's important that a commitment to building a stronger research base doesn't prevent us from acting today because we'll know more tomorrow.

Mindful that you can't cover everything, I do suggest some discussion of income and employment issues in your homelessness recommendations. Even if we could get vouchers for all, it'd still be valuable to do more to close the gap between income and rents on the income side. We're grateful for Matthew Desmond's recent work underscoring the devastating impacts of eviction and the need for prevention strategies before families become homeless.

Turning to efforts to address family violence, more than 12 million men and women each year are victims of rape, physical violence, or stalking by an intimate partner in the United States. While domestic violence affects every community, people living in poverty experience higher rates of abuse, domestic violence is a leading cause of homelessness, it disrupts the safety and development of children, and it has been associated with a wide range of health and behavioral health consequences—including depression and post-traumatic stress disorder. We've placed a broad cross-program emphasis on the need for human services programs to identify and address domestic violence.

Here, your first recommendation is to reprioritize Violence Against Women Act (VAWA) funding to support prevention and intervention activities and reduce funding for criminal-justice-related activities. I'd urge consideration of whether you're principally recommending expanded service funding or an actual reduction in criminal-justice-related activities. VAWA supports important criminal justice reforms to improve responses to domestic violence, sexual assault, and stalking, as well as victim services and prevention programs. ACF coordinates closely with the Department of Justice's efforts, and we administer the Family Violence Prevention and Services Act, which funds shelter and supportive services; provides funding for the National Domestic Violence Hotline; and funds a number of grant programs focused on expanding survivors' access to innovative, culturally responsive, and trauma-informed services. But despite federal efforts, services for victims of domestic violence fall short of need, and I agree about the need to highlight the gaps.

I appreciate your effort to highlight the cooccurrence of child maltreatment and domestic violence. Research suggests that both forms of abuse likely occur in an estimated 30% to 60% of the families in which either domestic violence or child maltreatment is identified. Research also finds that children who grow up in homes where there is domestic violence are more vulnerable to becoming victims and perpetrators of domestic violence. And men who witness violence as children are four times more likely to become perpetrators. At ACF, we're committed to work that focuses on the importance of these linkages. Later this month, we'll be issuing a grant for a Quality Improvement Center on Child Welfare Involved Children and Families Experiencing Domestic Violence.

Your recommendations highlight the potential virtue of linking birth, child-welfare, and criminal-justice data to identify children at high risk of severe and fatal maltreatment. This is one of a number of areas in which promoting data interoperability can support early identification, strengthen analytics, and improve service responses. We issued new regulations for Comprehensive Child Welfare Information Systems (2016) earlier this year. We've also urged Congress to provide enhanced funding to states to upgrade and modernize

their information systems. Exchanges with law enforcement are permissible under our regulations. And, we've recently awarded a contract to examine the use of predictive analytics in child welfare. That examination should identify options for ways in which the Department of Health and Human Services may facilitate the use of improved data capabilities.

If you are looking to add a recommendation in this area, I'd suggest considering more discussion of the need for support for prevention funding and efforts. We've urged Congress to make federal foster-care funding more flexible so that it can be more readily used for families at risk of foster care; and ultimately, it's key that improved analytics for identifying families most at risk are tied to the provision of services where needed.

I now want to turn to the recommendations for building financial capability and assets for all; this is an area that I've viewed as important ever since I read Michael Sherraden's Assets and the Poor in 1991. At ACF, we've made a broad commitment to advancing and supporting asset-building and financial-capability activities. We recognize that financial education and coaching are no substitute for a well-paying job, but financial capability activities can be complementary to and supportive of strategies to support success in the workforce. We've written to all human services commissioners to urge stronger attention to financial capability in human services programs, and we've provided technical assistance resources that encourage the integration of financial capability into existing programs. We're proud to have responsibility for the Assets for Independence Program, which supports state and local efforts to implement Individual Development Accounts, and we've urged Congress to make AFI funding more flexible with a stronger research commitment.

We work closely with colleagues at the Consumer Financial Protection Bureau (CFPB); I commend your recommendation acknowledging the importance of a strong CFPB, as well as your recommendation to prepare social workers and human service practitioners to build financial capability and assets for all. I want to note that the CFPB developed *Your Money, Your Goals* (2015), a toolkit to help frontline social workers and other human-services staff. The resource offers exercises and tools to foster understanding

of credit, debt, financial products, strategies for tracking income and spending, and much more. In addition, our Office of Community Services developed *Building Financial Capability: A Planning Guide for Integrated Services*, a tool to help organizations develop a plan for how social work and frontline staff can integrate financial capability services into existing humanservices programs (Corporation for Enterprise Development & Office of Community Services, 2015).

A key policy recommendation in this brief was for universal and progressive Child Development Accounts. We've taken a much more modest step, urging Congress to give us the flexibility to use AFI funding for a research agenda that would include children's accounts. I think a key question for you all here is whether you judge that the current state of research and the policy logic of children's accounts is strong enough to support a call for universal national implementation. I appreciate the potential to affect children's aspirations, life choices, and the racial wealth gap; I'm also mindful of costs and the competing policy choices that even a sympathetic Congress will face.

In your recommendation for a Web-Based Financial Capability Gateway, I take the central point as being that advances in technology provide new opportunities for the work of building assets and financial capability. I'd caution, though, that I don't think it follows that we necessarily want a single government website with all of one's financial data on it—recent experience raises too many concerns about security and privacy. But, I think a broader recommendation about the roles technology can play can be quite valuable, particularly if paired with a reminder about the importance of Internet access for low-income, unbanked, or otherwise vulnerable families in the United States.

Finally, while I appreciate you're not trying to make this brief longer, I'd flag several things which I'd wish to see get some greater discussion: strategies to address universal retirement; the best thinking on what we should be doing in addition to or beyond children's accounts to address the racial wealth gap; questions about how to address key special populations—for us at ACF, those include refugees and other new Americans, domestic violence survivors, youth

who are in and/or leaving foster care, and Native Americans. We're engaged in efforts for each of these. We wish the research and practice base were stronger.

I want to close by making several observations about strengthening engagement in the policy process. In doing so, I want to first note that there are many ways to affect public policy. I'm not purporting to address the connections to social movements, or engagement with social media, or ties to presidential campaigns, or a multitude of other ways in which you might take action to advance a policy agenda. I'm just focusing, admittedly narrowly, on effectively working with government officials.

I have four pieces of advice for doing this, and some are very consistent with what I heard last night. First, I want to emphasize the importance of being clear and concise in communications. Government officials have a wide range of backgrounds; some are grounded in research and some not. For me, some of the consequences of having made a shift from the policy world to being a federal official are that I rarely have as much time as I would like to consider anything; it's hard to take time to read something that's not closely connected to my work; and when I do read something, I need to focus on the practical implications for what I'm trying to get done in my job. In practice, this means that something long, complex, and theoretical is much less likely to get attention than something short, clear, and plainly relevant. I appreciate how frustrating that advice may be; I've spent much of my career writing long, thoughtful documents, most of which I wouldn't have time to read in my current job. So distilling work in an effective way is essential. At the same time, per my earlier comments, the work can't be conclusory—it has to consider and address the guestions an official will or should ask.

Second, if you're going to be making policy recommendations, I'd urge you to develop good engagement with government agencies, community organizations, practitioners, and policy groups that are paying close attention to the realities of program administration and implementation. From time to time, I read pieces that purport to describe a program but that are based on significantly outdated information or formal descriptions that sometimes aren't very good pictures of how the program actually

works. I appreciated hearing last night about the importance of bringing researchers and practitioners together, and practitioners will often have invaluable perspectives from their work. So, I'd urge that you supplement your work with relationships, conversations, site visits, and review by those who are more closely connected to actual program operation and implementation.

Third, I'd encourage more formal partnerships with state and local governments. The reality in our structure of federalism is that it's very rare for a concept to go from idea to national implementation; it's far more common that one state does something, then others do, then people begin a discussion of whether it's a potential federal model—particularly if there's data, evidence, and experience to draw upon. But state officials often have a minimal or nonexistent research budget, and a partnership is a key way not only for you to be better grounded, but for them to benefit from your experience and expertise.

And, finally, when there are opportunities to join government, even for a limited time, I'd encourage doing it. I'd emphasize the mutuality—government can benefit from your knowledge and expertise, and your subsequent work will benefit from the experience.

So, I want to close as I opened: by congratulating you on the ambition, vision, and substantive importance of this effort. I think it has great potential to help advance our understanding of the challenges and the potential solutions, and I wish you the very best as you move forward.

References

Administration for Children & Families, Family & Youth Services, Bureau, Street Outreach Program. (2016). *Data collection study final report*. Retrieved from https://www.acf.hhs.gov/sites/default/files/fysb/data_collection_study_final_report_street_outreach_program.pdf

Comprehensive Child Welfare Information Systems, 81 Fed. Reg. 35450 (June 2, 2016) (to be codified at 45 C.F.R. pt. 95, 1356, 1355), https:// www.gpo.gov/fdsys/pkg/FR-2016-06-02/pdf/2016 -12509.pdf

Consumer Financial Protection Bureau. (2015). Your money, your goals: A financial empowerment

toolkit for social services programs. Retrieved from http://www.consumerfinance.gov/your-money-your-goals/

Corporation for Enterprise Development & Office of Community Services. (2015). Building financial capability: A planning guide for integrated services. Retrieved from U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services website: http://www.acf.hhs.gov/ocs/training-video-series-building-financial-capability

Cunningham, M., Gearing, M., Pergamit, M., Zhang, S., McDaniel, M., & Howell, B. (2014). Supportive housing for high-need families in the child welfare system [Research Report]. Retrieved from Urban Institute website: http://www.urban.org/sites/default/files/alfresco/publication-pdfs/2000010 -Supportive-Housing-for-High-Need-Families-in-the -Child-Welfare-System.pdf

Huang, J., Sherraden, M. S., Clancy, M. M., Sherraden, M., Birkenmaier, J., Despard, M. R., ... Rothwell, D. (2016). *Policy recommendations for meeting the grand challenge to build financial capability and assets for all* (Grand Challenges for Social Work initiative Policy Brief No. 11). Retrieved from Washington University, Center for Social Development website: https://csd.wustl.edu/Publications/Documents/PB11.pdf

Kulkarni, S. J., Barth, R. P., & Messing, J. T. (2016). *Policy recommendations for meeting the grand challenge to stop family violence* (Grand Challenges for Social Work initiative Policy Brief No. 3). Retrieved from Washington University, Center for Social Development website: https://csd.wustl.edu/Publications/Documents/PB3.pdf

Office of Management and Budget. (2016). *Budget* of the U.S. *Government: Fiscal Year 2017*. Retrieved from https://www.whitehouse.gov/sites/default/files/omb/budget/fy2017/assets/budget.pdf

Padgett, D. K., Henwood, B. F., & Culhane, D. P. (2016). Policy recommendations for meeting the grand challenge to end homelessness (Grand Challenges for Social Work initiative Policy Brief No. 6). Retrieved from Washington University, Center for Social Development website: https://csd.wustl.edu/Publications/Documents/PB6.pdf

Sherraden, M. (1991). Assets and the poor: A new American welfare policy. Armonk, NY: M. E. Sharpe.

Author

Mark H. Greenberg is Acting Assistant Secretary of the Administration for Children & Families in the U.S. Department of Health and Human Services.

Suggested Citation

Greenberg, M. H. (2016). *Policy innovation for children and families* (CSD Perspective No. 16-46). St. Louis, MO: Washington University, Center for Social Development.

Washington University in St. Louis

GEORGE WARREN BROWN SCHOOL OF SOCIAL WORK

CENTER FOR SOCIAL DEVELOPMENT

George Warren Brown School of Social Work Campus Box 1196 One Brookings Drive St. Louis, Missouri 63130-4899

csd.wustl.edu