

Statement in Further Support of CFSA's Text Amendment Supplemental Information

COMMUNITY ENGAGEMENT

Over 20 years, through various community engagement, the various community groups have always been aware that the age range of youth that reside at our group homes would be up to the age of 21 as CFSA is responsible for youth up to the age of 21. It has always been CFSA's practice to engage the community when group homes sites for foster youth are identified to address questions and concerns community members may have about the home. During those discussions, CFSA always shared the age range of up to 21 years old of the youth that would be reside at the group homes. We also engage the community whenever issues come to our attention and the community is looking to CFSA for answers or to discuss. The agency also engages with the communities, partners, and individuals with lived experiences to help inform practice to eliminate racial and ethnic inequities. Amending the zoning definition to increase the age to 21 wasn't an issue until 2023 when CFSA learned that DOB could no longer provide COOs or approvals for group homes that serve foster youth over the age of 18 because of the age limits in the zoning definition. Prior to this, CFSA was able to license group homes that included older foster youth (up to age 21) because DOB provided the requisite zoning approvals necessary for CFSA to license these homes. When CFSA learned that DOB could only provide approvals for youth under 18, it had discussions with group homes seeking licensure and encouraged them to adjust their age range to under 18 to comply with the zoning regulations. However, by doing this, no group home COOs could be approved for youth over the age of 18.

Foster youth, particularly older youth, will be impacted if the age range for youth residential care homes is not increased. These are youth for whom placement can be challenging and who have specialized needs where a traditional foster home may not be appropriate. As most of the District's foster youth are children of color, a population that has been historically underserved, the zoning action (text amendment) will help ensure their health, safety, economic and social wellbeing.

RACIAL EQUITY

In the District, foster children may remain in foster care until their 21st birthday. This provides older foster youth with opportunities to develop life skills and to access housing and other supports to help them transition to adulthood. The Comprehensive Plan promotes the integration of vulnerable populations and persons with disabilities (§ 516) into the general population and encourages steps be taken to reduce the stigma associated with housing. It also encourages equitable development, a "participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant." (§ 213.7).

Most of CFSA's foster youth are children of color. As children of color are disproportionately represented in foster care, the proposed text amendment will help address systemic racial inequities by improving housing opportunities for older foster youth. The proposed text amendment will also minimize further trauma to the impacted youth who are already dealing with various types and levels of trauma from the reasons they came to the attention of CFSA, to being separated from their families, and

their involvement in the child welfare system. It will also ensure that the District can fulfill its responsibility for these youth who are in its care and custody.

Placement stability is crucial for foster children as it significantly impacts their overall well-being, allowing them to develop healthy attachments, improve behavioral outcomes, achieve better academic performance, and minimize the negative effects of trauma caused by frequent placement changes, ultimately contributing to a more positive path towards permanency; essentially, a stable placement is the foundation for a foster child's healthy development and reduces the risk of further distress from instability.

NEED FOR EMERGENCY ACTION

Emergency action is necessary to promote the immediate preservation of the health, safety, and welfare of the foster children who are in the District's care and custody. If the age range for youth residential care homes in the zoning regulations is not increased, CFSA will not be able to license groups homes for older youth. CFSA is currently experiencing barriers and anticipates a greater placement shortage for older foster youth when CFSA's current group home, where youth up to the age of 21 reside, contracts come up for renewal. This will create a crisis for the over 18 years of age foster youth population. In addition, the older foster youth, who are currently placed in those group homes, will have to be uprooted and placed in settings that are less equipped to serve their needs and provide for their safety and wellbeing without the proposed text amendment.

CFSA will not be able to license groups homes for older youth without DOB approval or a certificate of occupancy. This will cause a placement shortage for youth over 18 which cannot be remedied by finding other types of placements, such as independent living programs or foster homes. Many of CFSA's older foster children who reside in group homes are not eligible for independent living programs which are only available to youth who are at least 20 years old and have met other eligibility criteria. Traditional foster homes are often not an option for older youth who need a higher level of support and supervision that group homes provide.

- **DATA - Number of children in care over the last 5 years:**

| | FY20 | FY21 | FY22 | FY23 | FY24 |
|---------------------|-------------|-------------|-------------|-------------|-------------|
| All Children | 693 | 614 | 537 | 496 | 547 |
| Ages 18-21 | 127 | 125 | 121 | 110 | 93 |
| Percentage | 18% | 20% | 23% | 22% | 17% |

**As of September 30, 2024, the number of 18-21 olds that are placed in the following group homes:
Gang, Umbrella and Caitlin's Place:**

Gang: 3

Umbrella: 2

Caitlin's Place: 4

The contracts for these group homes are up for renewal this year. Without the text amendment, CFSA will not be able to place youth up to the age of 21 in those homes and the youth currently placed at those group homes will need to find alternative placements. Additionally, once relicensed, CFSA will not be able to place any youth up to the age of 21 in these group homes or the other group homes in our placement array without the text amendment.

Appropriate and stable placements are important for foster youth. Having to change placements can trigger traumatic experiences, leading to anxiety, depression, and behavioral problems. Stable and appropriate placements, allow foster youth to build secure relationships, which is vital for their emotional development, better education outcomes, better behavioral adjustment and reduced aggression, their likelihood of achieving a permanent living situation.