

January 19, 2016

Senator Kathy Campbell, Chair
Health and Human Services Committee
P.O. Box 94604
Lincoln, NE 68509-4604

RE: LB 746

Dear Senator Campbell and members of the Health and Human Services Committee:

I am writing to provide feedback regarding LB 746, the Nebraska Strengthening Families Act. The Department has been working on implementing the federal Preventing Sex Trafficking and Strengthening Families Act which contains many of the same provisions set forth in LB 746, specifically the use of the Reasonable and Prudent Parent Standard. The use of this standard will help children develop and maintain a sense of normalcy.

However, there are some small differences between LB 746 and the Preventing Sex Trafficking and Strengthening Families Act, which would require changes to be made to the NFOCUS system, Department regulations, policy and practice. I am concerned that the emergency clause attached to this bill would make it impossible for the Department to be in Statutory compliance on passage of the bill. I respectfully request that a date of enactment be established for "on or after July 1, 2016."

DHHS has participated on the existing Normalcy task force, but does not believe it is necessary to place it in statute, which takes away some of the flexibility that may be needed in the future.

I greatly appreciate the opportunity to share the above concern and recommendation and look forward to our continuing work for the children and families of Nebraska.

Sincerely,



Doug Weinberg, Director
Division of Children and Family Services
Department of Health and Human Services