

1 EDMUND G. BROWN JR.
 Attorney General of California
 2 SUSAN M. CARSON
 Supervising Deputy Attorney General
 3 State Bar No. 135875
 GEORGE PRINCE
 4 Deputy Attorney General
 State Bar No. 133877
 5 455 Golden Gate Avenue, Suite 11000
 San Francisco, CA 94102-7004
 6 Telephone: (415) 703-5749
 Fax: (415) 703-5480
 7 E-mail: George.Prince@doj.ca.gov
Attorneys for Defendants

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 9 IN THE UNITED STATES DISTRICT COURT
 10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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13 **CALIFORNIA ALLIANCE OF CHILD
 14 AND FAMILY SERVICES,**

CV 09-4398 MHP

15 Plaintiff,

**DECLARATION OF CHERYL
 TREADWELL IN SUPPORT OF
 DEFENDANTS' OPPOSITION TO
 MOTION FOR A TEMPORARY
 RESTRAINING ORDER AND AND
 ORDER TO SHOW CAUSE RE:
 PRELIMINARY INJUNCTION**

16 v.

17 **JOHN WAGNER, Director of the California
 18 Department of Social Services, in his official
 capacity; GREGORY ROSE, Deputy
 19 Director of the Children and Family
 Services Division of the California
 20 Department of Social Services, in his official
 capacity,**

Date: 10/9/2009
 Time: 2:30 p.m.
 Courtroom: 15, 18th Floor, San Francisco
 Judge The Hon. Marilyn Hall Patel

21 Defendants.
 22

Action Filed: September 18, 2009

23 I, Cheryl Treadwell, declare as follows:

24 1. I am the Chief of the Resource Development and Training Support Bureau within the
 25 Child Protection and Family Support Branch of the Children and Family Services Division of the
 26 California Department of Social Services (CDSS). I have held this position since May 1, 2009.
 27 In this position, I supervise the Integrated Services Unit, Title IV-E Waiver Demonstration
 28

1 Project and the Training Support Unit. Prior to assuming my current position, I was the Manager
2 of the Integrated Services Bureau, a post I had held since May 2002. The Integrated Services
3 Unit (ISU) supports several programs, including the Senate Bill (SB) 163 wraparound program,
4 the Youth Pilot Program, and the Integrated Comprehensive Health and Human Services Pilot
5 Program. Among the ISU's responsibilities is oversight for the implementation of the Mental
6 Health Services Act as it applies to CDSS programs.
7

8 2. The SB 163 Wraparound Program is a state program in the child welfare services
9 system that authorizes the use of state and county foster care funds for "wrap-around services" as
10 defined in Chapter 4 of Part 6 of Division 9 of the Welfare and Institutions Code, commencing at
11 Welfare and Institutions Code Section 18250. The Legislature's intent as stated in this section is
12 to authorize counties "to provide children with service alternatives to group home care through
13 the development of expanded family-based services programs. These programs shall include
14 individualized or 'wrap-around' services, where services are wrapped around a child living with
15 his or her birth parent, relative, adoptive parent, licensed or certified foster parent, or guardian.
16 The wrap-around services developed under this section shall build on the strengths of each
17 eligible child and family and be tailored to address their unique and changing needs." (Welfare &
18 Institutions Code section 18250). Services are coordinated using the wraparound planning
19 process and are intended to enable the child to either remain at home or be placed in a foster care
20 setting that is less restrictive than a group home. Providers such as Families First (into which
21 Eastfield Ming Quong (EMQ) merged leaving Families First as the surviving entity, dba EMQ
22 Families First) – a provider that was included on the list of facilities attached as Exhibit B to the
23 declaration of Doug Johnson filed in this action, which I have personally reviewed -- were early
24 adopters of this model, which transformed their agency's function from primarily a provider of
25 residential beds to a premiere provider of community-based services.
26
27
28

1 3. Since the implementation of the statewide program in 1998 the SB 163 Wraparound
2 has grown to 43 counties. The following additional counties are in an active planning stage of
3 developing their SB 163 wraparound programs: Calaveras, Imperial, Lake, Sierra, Sonoma,
4 Stanislaus, Tuolumne and Yuba. One of the driving forces behind this expansion is a provision of
5 the Mental Health Services Act, which makes part of the funding to a county contingent on the
6 county either having an SB 163 program or, after receiving technical assistance from CDSS,
7 providing an explanation as to why a wraparound program is not feasible for implementation in
8 their county.
9

10 4. According to data in the Child Welfare Services Case Management System
11 (CWS/CMS), group home caseloads have steadily decreased while the wraparound caseload has
12 increased. As of January 1, 2009, the group home population in California (7,418) had declined
13 by 33 percent from its high point of having 11,160 children on January 1, 2003. In 2003, group
14 home placements represented 11.5 percent of the total foster care population; in 2009, they
15 represent a smaller proportion (10.4 percent) of a smaller overall foster care population. During
16 this same time period, the overall foster care population declined from 96,813 in January 2003 to
17 70,916 in January 2009. At the same time that these group home caseloads have steadily
18 decreased, research shows that the number of children placed with foster families or kinship
19 placements continues to increase. (See Exhibit A, found at
20 http://cssr.berkeley.edu/ucb_childwelfare; Data Source: CWS/CMS 2009 Quarter 1 Extract;
21 Needell, B., Webster, D., Armijo, M., Lee, S., Dawson, W., Magruder, J., Exel, M., Glasser, T.,
22 Williams, D., Zimmerman, K., Simon, V., Putnam-Hornstein, E., Frerer, K., Cuccaro-Alamin, S.,
23 Lou, C., Peng, C. & Holmes, A. (2009). Child Welfare Services Reports for California. Retrieved
24 10/2/2009, from the University of California at Berkeley Center for Social Services Research
25 website.)
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GENERAL ORDER 45 ATTESTATION

I, George Prince, am the ECF user whose ID and password are being used to file this request for an order. In compliance with General Order 45, X.B., I hereby attest that declarant Cheryl Treadwell has concurred in the filing of this document with her electronic signature.

Dated: October 5, 2009

/s/ George Prince
George Prince

EXHIBIT A

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Center for Social Services Research
 University of California at Berkeley
Children in Foster Care
 Agency Type=All Types

California

Placement Type	Point In Time											
	Jan 1, 1998	Jan 1, 1999	Jan 1, 2000	Jan 1, 2001	Jan 1, 2002	Jan 1, 2003	Jan 1, 2004	Jan 1, 2005	Jan 1, 2006	Jan 1, 2007	Jan 1, 2008	Jan 1, 2009
Pre-Adopt	1,347	1,909	2,637	2,717	2,513	2,733	1,957	2,052	1,945	2,078	2,172	2,360
Kin	46,315	46,022	44,623	36,058	32,269	29,465	27,524	26,415	27,096	26,832	26,727	22,078
Foster	19,960	18,762	16,061	14,689	13,798	12,553	11,363	9,869	8,800	7,998	7,129	6,411
FFA	16,503	18,090	18,151	18,240	19,188	19,654	19,074	18,556	18,723	19,112	18,572	17,851
Court Specified Home	3,438	2,842	1,816	1,156	900	885	708	580	499	459	380	366
Group	10,856	10,523	10,472	10,446	10,735	11,160	11,092	10,519	10,088	9,256	8,338	7,418
Shelter	3,454	2,065	2,798	869	610	399	232	260	255	187	149	185
Non-FC	311	408	472	614	662	627	568	511	479	491	440	421
Transitional Housing	34	45	36	69	95	112	173	181	189	223	239	227
Guardian - Dependent	2,776	3,786	5,082	5,062	5,265	5,412	5,040	4,892	4,772	4,474	3,996	3,327
Guardian -												

Other	3,235	3,787	4,314	4,444	4,626	4,876	5,145	5,313	5,284	5,107	4,923	4,784
Runaway	252	930	1,139	1,448	1,665	1,932	2,238	2,467	2,383	2,398	2,274	2,541
Trial Home Visit	170	2,943	3,362	4,363	3,122	2,390	1,516	1,546	784	741	759	818
Other (?)	3,106	5,275	4,564	5,356	4,862	4,615	4,502	3,453	2,971	2,939	2,438	2,129
Missing	5	1	1	1	1							
Total	111,762	117,398	115,528	105,532	100,311	96,813	91,132	86,614	84,268	82,295	77,536	70,916

Data Source: CWS/CMS 2009 Quarter 1 Extract
 Program version: 1.35 Database version: 5D51F9ED

This request took 4.78 seconds of real time (v9.2 build 1489).

Citation:

The suggested way to cite the above data is as follows:
 Naeffelt, B., Webster, D., Arnijo, M., Lee, S., Dawson, W., Magruder, J., Exel, M., Glasser, T., Williams, D., Zimmerman, K., Simon, V., Pufham-Hornstein, E., Freyer, K., Cuccaro-Alamin, S., Lou, C., Peng, C. & Holmes, A. (2009). Child Welfare Services Reports for California. Retrieved 10/2/2009, from University of California at Berkeley Center for Social Services Research website. URL: <http://cssr.berkeley.edu/ucb_childwelfare>

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Center for Social Services Research
 University of California at Berkeley
Children in Foster Care
Agency Type=All Types

California

Placement Type	Point in Time											
	Jan 1, 1998	Jan 1, 1999	Jan 1, 2000	Jan 1, 2001	Jan 1, 2002	Jan 1, 2003	Jan 1, 2004	Jan 1, 2005	Jan 1, 2006	Jan 1, 2007	Jan 1, 2008	Jan 1, 2009
Pre-Adopt	1.2	1.6	2.3	2.6	2.5	2.8	2.1	2.4	2.3	2.5	2.8	3.3
Kin	41.4	39.2	38.6	34.2	32.2	30.4	30.2	30.5	32.2	32.6	33.2	31.1
Foster	17.9	16.0	13.9	13.9	13.8	13.0	12.5	11.4	10.4	9.7	9.2	9.0
FFA	14.8	15.4	15.7	17.3	19.1	20.3	20.9	21.4	22.2	23.2	24.0	25.2
Count Specified Home	3.1	2.4	1.6	1.1	0.9	0.9	0.8	0.7	0.6	0.6	0.5	0.5
Group	9.7	9.0	9.1	9.9	10.7	11.5	12.2	12.1	12.0	11.2	10.8	10.5
Shelter	3.1	1.8	2.4	0.8	0.6	0.4	0.3	0.3	0.3	0.2	0.2	0.3
Non-FC	0.3	0.3	0.4	0.6	0.7	0.6	0.6	0.6	0.6	0.6	0.6	0.6
Transitional Housing	0.0	0.0	0.0	0.1	0.1	0.1	0.2	0.2	0.2	0.3	0.3	0.3
Guardian - Dependent	2.5	3.2	4.4	4.8	5.2	5.6	5.5	5.6	5.7	5.4	5.2	4.7
Guardian - Other	2.9	3.2	3.7	4.2	4.6	5.0	5.6	6.1	6.3	6.2	6.3	6.7

Runaway	0.2	0.8	1.0	1.4	1.7	2.0	2.5	2.8	2.8	2.9	2.9	3.6
Trial Home Visit	0.2	2.5	2.9	4.1	3.1	2.5	1.7	1.8	0.9	0.9	1.0	1.2
Other (?)	2.8	4.5	4.0	5.1	4.8	4.8	4.9	4.0	3.5	3.6	3.1	3.0
Missing												
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Percent calculations do not include 'Missing'.
 Data Source: CWS/CMS 2009 Quarter 1 Extract.
 Program version: 1.35 Database version: SD51F9ED

This request took 4.11 seconds of real time (v9.2 build 1489).

Citation:
 The suggested way to cite the above data is as follows:
 Needell, B., Webster, D., Antijo, M., Lee, S., Dawson, W., Magruder, J., Exel, M., Glasser, T., Williams, D., Zimmerman, K., Simon, V., Putnam-Hornstein, E., Freyer, K., Cuccaro-Alamin, S., Lou, C., Peng, C. & Holmes, A. (2009). *Child Welfare Services Reports for California*. Retrieved 10/2/2009, from University of California at Berkeley Center for Social Services Research website. URL: <http://cssr.berkeley.edu/ucb_childwelfare>