

I have been a family advocate for CPS involved parents for 3 years. I have seen court reports for child removal that indicate a severe lack of evidence other than a social worker opinion and guess that a child is in imminent danger in the future, an oxymoron in itself. I have seen state statutes that define child neglect as the inability of a parent to provide housing, clothing, medical care, education or supervision. Where are the guidelines that decide that a parent is unable to provide these basic needs of a child vs. inability to do so due to poverty or other issues that could be resolved to avoid a traumatic removal? Federal guidelines put child protection and family preservation as the two major goals. Yet, I have no information on how social services makes a determination that a removal is priority over family preservation. I would strongly suggest that states use their latitude on categorizing child neglect (80% of all removals nationally) to justify state and federal funding that has a benefit to maintain child welfare agencies.

If I were to perform the task of a CFSR, I would want to personally question the agency about the decision to remove a child that is known to be a last resort only, versus what steps could have been taken to avoid that removal in the way of services to address the issues. Since I have information that indigent families are not diligently represented by court appoint attorneys. a double whammy for these families, I would expect federal standards to pick up the slack on this and address this one issue: **WHERE ARE THE GUIDELINES THAT DETERMINE WHEN A CHILD REMOVAL IS THE ONLY CHOICE ON A NEGLECT ALLEGATION? WHERE IS IT DOCUMENTED IN THE COURT RECORD?** It is my belief that child neglect has a very low bar for agencies. That needs to be corrected.