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August 18, 2023

The Honorable Tammy Baldwin  
Chair  
The Honorable Shelley Moore Capitol  
Ranking Member  
Subcommittee on Labor, Health and Human Services, Education, and Related Agencies  
Committee on Appropriations  
United States Senate  
The Honorable Robert Aderholt  
Chair  
The Honorable Rosa DeLauro  
Ranking Member  
Subcommittee on Labor, Health and Human Services, Education  
Committee on Appropriations  
House of Representatives

**Trauma-Informed Care: Challenges to Developing and Implementing Performance Partnership Pilots to Serve Children**

Trauma is a widespread, harmful, and costly public health problem. Any frightening, dangerous, or violent event that threatens the life or safety of a child or their loved ones can potentially be traumatic. As we reported in 2019, trauma significantly increases the risk of problems with mental and physical health, social relationships and behavior, and school performance.<sup>1</sup>

Many children and families affected by trauma receive services through multiple systems, such as child welfare, health care (including behavioral health care), juvenile justice, and schools. These services may include trauma-informed care, which can refer to evidence-based interventions (treatment) or a broader approach that integrates practices throughout a service delivery system (an organizational culture or paradigm shift). To ensure that youth receive trauma-informed care across systems and in a coordinated manner, communities need support to build infrastructure and capacity.

Congress may authorize a variety of approaches to help build infrastructure and capacity. Performance partnerships are one approach. Performance partnerships allow a federal agency or multiple federal agencies to provide grant recipients flexibility in how they use funding across two or more programs, among other flexibilities. In exchange for these flexibilities, recipients commit to improve agreed-upon outcomes and assess progress towards them. Senate Report 115-150 includes a provision for us to, among other things, identify barriers or challenges faced by organizations that receive funding from multiple federal programs to serve children exposed to trauma. This report examines challenges state and local governments and other

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<sup>1</sup>GAO, Children Affected by Trauma: Selected States Report Various Approaches and Challenges to Supporting Children, [GAO-19-388](#) (Washington, D.C.: April 24, 2019).

organizations might face in using performance partnership pilots to serve children exposed to trauma.

To address this objective, we reviewed Performance Partnership Pilots for Disconnected Youth (P3) reports and issue briefs;<sup>2</sup> Building a Multi-System Trauma-Informed Collaborative: A Guide for Adopting a Cross-System, Trauma-Informed Approach Among Child-Serving Agencies and Their Partners;<sup>3</sup> federal agency documents; and prior GAO reports. In addition, we interviewed a former Office of Management and Budget official who helped create and implement performance partnership pilots for disconnected youth. We also interviewed individuals who provided technical assistance to and wrote the guide about the Multi-System Trauma-Informed Collaborative, and Substance Abuse and Mental Health Services Administration officials who facilitate and coordinate the work of the federal Interagency Task Force on Trauma-Informed Care.<sup>4</sup> Through our review of documents and interviews we identified challenges that state and local governments and other organizations may face in developing and implementing performance partnership pilots to serve children exposed to trauma.

We conducted this performance audit from January 2023 to August 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

On June 29, 2023, we briefed Senate staff on the preliminary results of this study. This report formally conveys the information provided during this briefing, as summarized below (see enclosure I for the briefing slides).

- State and local governments and other organizations may find it difficult to get partners to coalesce around performance partnership pilots to serve children exposed to trauma. According to Mathematica, trust and buy-in were key factors that influence P3 programs' use of the flexibilities afforded to them. Leadership in five of the 14 P3 programs noted that they were unable to secure enough trust and buy-in from their state and local partners to implement their planned approaches. American Institutes for Research (AIR) officials told us that states were delayed in beginning their work by about 6 months, in part, because it took time to get people engaged in the initiative.
- State and local governments and other organizations may find it difficult to achieve their goals, including systems change, if they do not have sufficient time for planning. AIR officials

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<sup>2</sup>Congress has authorized two federal performance partnership initiatives, the Environmental Protection Agency's Performance Partnership Grants and the multi-agency Performance Partnership Pilots for Disconnected Youth (P3). To evaluate P3, the Department of Labor, in 2015, awarded Mathematica and Social Policy Research Associates a 5-year contract.

<sup>3</sup>The Building a Multi-System Trauma-Informed Collaborative guide was developed by Chapin Hall and the American Institutes for Research. The guide summarizes lessons learned by three states' efforts—Connecticut, Illinois, Washington—to build the capacity of state child-serving systems to develop, coordinate, and enhance policies and practices for serving youth exposed to violence and other traumas.

<sup>4</sup>The SUPPORT for Patients and Communities Act (Pub. L. No. 115-271) included a provision to establish the Interagency Task Force on Trauma-Informed Care. The task force is charged with identifying, evaluating, and making recommendations regarding (1) best practices with respect to children, youth, and their families who have experienced trauma or are at risk of experiencing trauma; and (2) ways federal agencies can better coordinate responses to families affected by substance use disorders and other forms of trauma.

told us that planning entails getting people to the table; determining infrastructure; assessing agencies' knowledge, understanding, practices, and policies; and mapping resources. AIR officials noted that if a system is not set up well and the planning process is skipped, then money for services may not be used effectively. Mathematica concluded that dedicated planning time could support accomplishing foundational work for systems change.

- Data sharing would be central to developing and implementing performance partnership pilots and trauma-informed systems; however, several issues, such as privacy concerns, may undermine data sharing efforts. Mathematica reported that the seven pilots that planned to incorporate data sharing into their P3 approach were hampered by the lack of capabilities among existing information systems. In addition, they were hampered by the time and effort involved in getting all parties to buy in to data sharing, agencies' desire to maintain their own information systems, and confidentiality concerns. However, according to AIR officials, individuals need to share data across agencies to prevent families from having to repeatedly provide the same information to multiple agencies, which may re-traumatize children and families.

### **Agency Comments**

We provided the briefing slides to the Department of Health and Human Services for review and comment. HHS provided technical comments, which we incorporated in the report as appropriate.

If you and your staff have any questions, please contact Kathryn A. Larin at (202) 512-7215 or [larink@gao.gov](mailto:larink@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Major contributors to this report were Sara Schibanoff Kelly (Assistant Director), Ramona L. Burton (Analyst in Charge), Andrea Dawson, Dana Hopings, Jean McSween, Mimi Nguyen, Jennifer Padgett, James Rebbe, Almeta Spencer, and Adam Wendel.



Kathryn A. Larin, Director  
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Enclosure-I

## Enclosure - Briefing Slides

### Trauma-Informed Care: Challenges to Developing and Implementing Performance Partnership Pilots to Serve Children

#### A Briefing to Congressional Committees June 29, 2023

Updated on August 2, 2023

#### **Agenda**

- Objective
- Background
- Scope and Methodology
- Findings

#### **Objective**

- What challenges might state and local governments and other organizations face in using federal programs to develop and implement performance partnership pilots to serve children exposed to trauma?

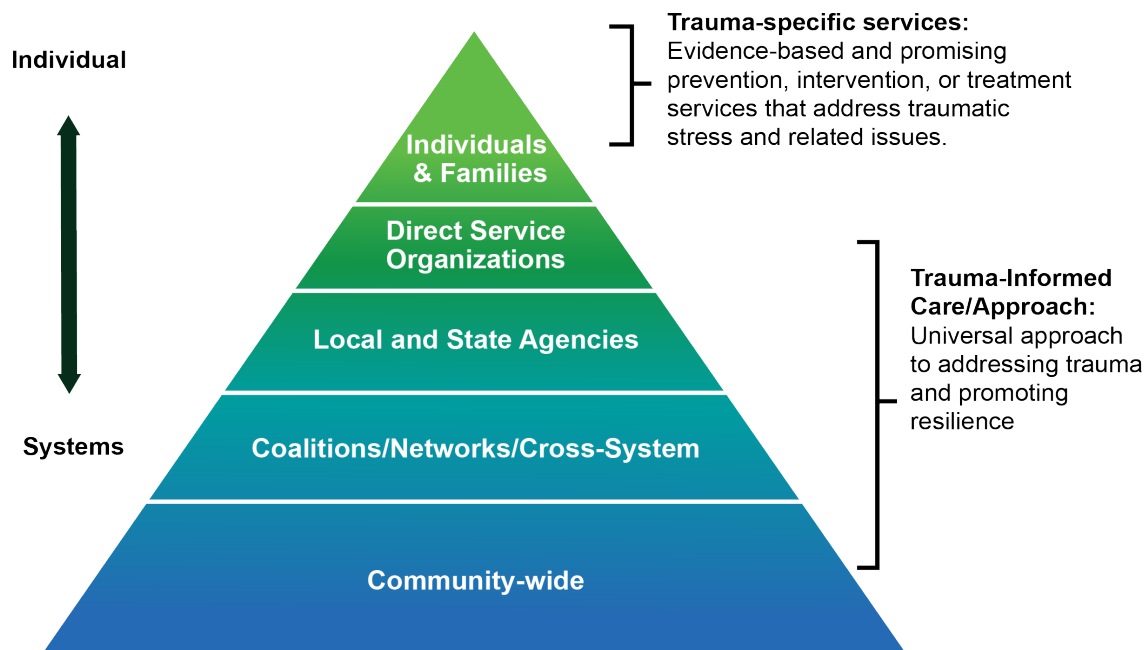
#### **Background: Trauma**

- Trauma is a widespread, harmful, and costly public health problem. Any frightening, dangerous, or violent event that threatens the life or safety of a child or their loved ones can potentially be traumatic. While not every child who experiences trauma will suffer lasting effects, studies have shown that for many there are serious short- and long-term consequences.
- As GAO reported in 2019, trauma significantly increases the risk of problems with mental health, social relationships and behavior, physical illness, and school performance.

#### **Background: Trauma-Informed Care**

- Trauma-informed care can refer to either evidence-based interventions (treatment) or to a broader system-level approach that integrates practices throughout a service delivery system (an organizational culture or paradigm shift).
- According to the Substance Abuse and Mental Health Services Administration, trauma-informed approaches:
  - realize the widespread impact of trauma and understand potential paths for recovery;
  - recognize the signs and symptoms of trauma in clients, families, staff, and others involved with the system;
  - respond by fully integrating knowledge about trauma into policies, procedures, and practices; and
  - seek to actively resist re-traumatization.

## Background: A Comprehensive Approach to Addressing Trauma



Source: American Institutes for Research; Substance Abuse and Mental Health Services Administration, 2014. | GAO-23-106538

- Many children and families affected by trauma receive services through multiple systems, such as child welfare, health care (including behavioral health care), juvenile justice, and schools.
- Ensuring that all service delivery systems adopt a trauma-informed approach allows children, youth, and their families to build resilience and heal in environments, according to the Substance Abuse and Mental Health Services Administration.
- To ensure that youth receive trauma-informed care across systems and in a coordinated manner, communities need support to build infrastructure and capacity.
- Congress may authorize a variety of approaches to help build infrastructure and capacity. Performance partnerships are one approach.

### Background: Performance Partnerships

- Performance partnership initiatives allow a federal agency or multiple federal agencies to provide grant recipients flexibility in how they use funding across two or more programs along with additional flexibilities. In exchange for these flexibilities, recipients commit to improve agreed-upon outcomes and assess progress towards them.
- Authorized in fiscal year 2014, Performance Partnership Pilots for Disconnected Youth (P3) allowed funding from multiple programs across multiple agencies to be combined into pilot programs serving youth who are disconnected from school and work.
- The authority enabled pilot sites to blend federal funds and obtain waivers of program requirements, including requirements that are barriers to achieving improved outcomes for youth-serving programs described in the authority.
- Seventeen state, local, and tribal communities have participated in P3 since Congress initially authorized it—nine in FY 2014, one in FY 2015, five in FY 2016, and two in FY 2022.
- To implement their approaches to serving disconnected youth, all pilots brought together partners across workforce development, education, and other domains.

## Scope and Methodology

To address our objective, we reviewed:

### Performance Partnership Pilots for Disconnected Youth (P3) reports and issue briefs

- To evaluate P3, the Department of Labor, in 2015, awarded Mathematica and Social Policy Research Associates a 5- year contract. Over the course of the evaluation period, the reports document 14 of the pilots' efforts to, among other things, promote systems change at the state or community level.<sup>5</sup> Mathematica defined systems change as changes in how partner agencies in each pilot worked together through their governance structures, communication practices, and data-sharing approaches.

We also reviewed:

### Building a Multi-System Trauma-Informed Collaborative: A Guide for Adopting a Cross-System, Trauma-Informed Approach Among Child- Serving Agencies and Their Partners

- In 2016, the U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention, launched the Multi-System Trauma-Informed Collaborative (MSTIC) to build the capacity of state child-serving systems to develop, coordinate, and enhance policies and practices for serving youth exposed to violence and other traumas.
- The guide, developed by Chapin Hall and the American Institutes for Research (AIR), summarizes lessons learned by three state teams' cross-systems efforts—Connecticut, Illinois, Washington.

### Federal agency documents and prior GAO reports

We conducted interviews with:

- a former Office of Management and Budget (OMB) official who helped create and implement performance partnership pilots for disconnected youth,
- individuals who provided training and technical assistance to and wrote the guide about MSTIC, and
- Substance Abuse and Mental Health Services Administration officials who facilitate and coordinate the work of the federal Interagency Task Force on Trauma-Informed Care.

Through our review of documents and interviews we identified common and unique challenges that state and local governments and other organizations may face in developing and implementing performance partnership pilots to serve children exposed to trauma.

We conducted this performance audit from January 2023 to August 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>5</sup> Mathematica's evaluation focused on 14 of 15 state, local, and tribal communities that were awarded pilots from FY2014 through

## Finding

### Buy-In from Partners May Be Difficult to Obtain

State and local governments and other organizations may find it difficult to get partners to coalesce around performance partnership pilots to serve children exposed to trauma.

- According to Mathematica, trust and buy-in were key factors that influence P3s' use of the flexibilities afforded to them.
- Leadership in five of the 14 P3s noted that they were unable to secure enough trust and buy-in from their state and local partners to implement their planned approaches.
- For example, respondents from one pilot reported a lack of trust among key partners that resulted in the fear of being penalized by the relevant federal agency for blending funds (combining funds into one award), which caused the pilot to braid (coordinate funds) rather than blend funds.
- Chapin Hall and AIR recommend that collaboratives recruit representatives from child-serving public agencies to participate on a cross-system steering committee to support and oversee the strategic planning and implementation process.
- AIR officials told us that states were delayed in beginning their work by about 6 months, in part, because it took time to get people engaged in the initiative.

### Absent Time for Planning, Partners May Not Achieve Goals or Use Resources Effectively

State and local governments and other organizations may find it difficult to achieve their goals, including systems change, if they do not have sufficient time for planning.

- Mathematica reported that, 3 of 14 P3s made systems change activities central to their approach. These specific pilots spent years—before they applied for P3—building collaborations across youth-serving agencies to identify and address systems-level issues.
- AIR officials told us that planning entails getting people to the table; determining infrastructure; assessing agencies' knowledge, understanding, practices, and policies; and mapping resources. AIR officials noted that if a system is not set up well and the planning process is skipped, then money for services may not be used effectively.
- Mathematica concluded that dedicated planning time could support accomplishing foundational work for systems change.

### Capabilities, Buy-In, and Privacy Issues May Hamper Data Sharing

Data sharing would be central to developing and implementing performance partnership pilots and trauma-informed systems; however, several issues, such as privacy concerns, may undermine data sharing efforts.

- Mathematica reported that the seven pilots that planned to incorporate data sharing into their P3 approach were hampered by:
  - lack of capabilities among existing information systems,
  - the time and effort involved in getting all parties to buy in to data sharing,
  - agencies' desire to maintain their own information systems, and
  - confidentiality concerns, particularly under the Family Educational Rights and Privacy Act.
- Mathematica reported that one P3 noted limited communication between system developers and direct-service providers and limited data management experience made it difficult to implement a shared data system.

- Mathematica also reported that partners in one pilot expressed concerns that a shared data system might compromise trust they had built with youth.
- However, according to AIR officials, individuals need to share data across agencies to prevent families from having to repeatedly provide the same information to multiple agencies, which may re-traumatize children and families.

### **Additional Challenges**

- Paradigm shift – GAO reported in 2019 that trauma-informed care involves a culture change and/or paradigm-shift. Trauma-informed practices must become embedded in systems. Developing and implementing a trauma-informed system requires, among other things, training employees throughout and across offices and organizations.
- Leadership - According to AIR officials, to develop and implement a trauma-informed collaborative or system a leader or lead agency has to facilitate cross-agency collaboration. The leader has to have time and money. In addition, there has to be an agency that is willing to prioritize and sustain the effort.
- Blending and braiding funds – According to Mathematica, pilots’ understanding of the flexibilities available under P3 was important to their ability to fully use these flexibilities. Mathematica reported that leaders in four of the 14 pilots lacked a clear understanding of the difference between blending and braiding funds.
- Increased workload – According to a former OMB official, in developing and implementing performance partnerships, officials have to operate their traditional programs while establishing a new initiative, with new people, and few dollars. The official noted that P3 did not provide state and local officials with relief from other work.
- Differences in knowledge and progress – According to AIR officials, agencies want to get something out of the collaborative effort. Agencies that are new to trauma-informed care will gain knowledge. However, they said that agencies with more experience need to gain something too. AIR officials provided training and technical assistance to state collaboratives.