



January 28, 2022

Vicki Spriggs, CEO
Texas CASA
1501 West Anderson Lane, Suite B-2
Austin, TX 78757

Dear Vicki,

This communication is National CASA/GAL Association's response to the local standards waiver requests submitted by Texas CASA and your Board of Directors on behalf of the CASA network in Texas. Specifically, there were waivers requested for three specific standards/elements of practices in the *Standards for Local CASA/GAL Programs-2020: Programs Structured as Nonprofits*. Those waiver requests and National CASA/GAL's responses are as follows:

1. **Standard 6.A.3.b** – Establishes a logic model that is adopted by the governing board and evaluated annually.
 - a. **Waiver Request:** On behalf of the CASA network in Texas, we respectfully request a waiver to the standard requesting each program create their own logic model and evaluate it annually. We seek approval for local CASA programs in Texas to use the Texas wide logic model which will be evaluated and/or revised every 3 years with the input of the CASA network in Texas.
 - b. **National CASA/GAL Response:** The Texas CASA Logic Model can be used by the local programs. However, it should be adopted by the local governing boards and reviewed annually on a local level. (Note: The assumption is that the logic model is formally adopted by the Texas CASA Board of Directors though it was not evident from the document). The *Standards for Local CASA/GAL Programs* do not prohibit local programs from adopting policies or plans developed in collaboration with state CASA/GAL organizations.
2. **Standard 8.F.5.g** - Meets in person with the child once every 30 days at a minimum.
 - a. **Waiver Request:** On behalf of the CASA network in Texas, we respectfully request a waiver regarding the frequency of face-to-face visits based on geographic distances within our state. We seek approval for the exception outlined above, along with alternatives for in-person contact, to serve as an approved policy for CASA programs in Texas and to be included in the Texas CASA Standards.
 - b. **National CASA/GAL Response:** The *Standards for Local CASA/GAL Programs* already address exceptions to this element of practice; therefore, a waiver is not warranted. Local programs are to follow the process that has been outlined. Specifically, Standard 8.F.5.g.ii states: [To allow for an exception, the program must have a written exceptions policy outlining circumstances when exceptions may be permitted. Exceptions to permit less frequent in-person contact, or alternatives for in-person contact, shall be documented and retained in the program's case record as to the justification for and reasonableness of the exception.](#)

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3. **Standard 8.C.3** - The National CASA/GAL Association pre-service training is to be delivered in accordance with the one of the National CASA/GAL Association modalities and for the duration specified by the chosen modality, including in-person contact for program staff to evaluate the applicant's suitability to serve as a volunteer, as specified by the chosen modality.
 - a. **Waiver Request:** On behalf of the CASA network in Texas, we respectfully request a waiver to the standard requesting each program adhere to in-person training hours based on the training modality. We seek approval for local CASA programs in Texas CASA to conduct virtual training in lieu of the required in-person hours defined by the training modality, which will be evaluated by Texas CASA during our next full QA cycle (FY23 - FY25).
 - b. **National CASA/GAL Response:** National CASA/GAL issued an exception to the requirement(s) of in-person contact for the modalities if/when they could not be met due to the pandemic associated health and logistical risks and challenges. National CASA/GAL still has that blanket allowance for the network. Therefore, consideration of a waiver at this time for a single state network is premature. National CASA/GAL will be evaluating the impact, if any, of the exception that has been granted network-wide.

Thank you again for bringing forth these waiver requests on behalf of the CASA network in Texas. I trust that this communication provides Texas CASA with the information needed to guide the local programs in Texas through the Local Program Self-Assessment and Annual Survey opening this Monday (January 31, 2022).

Should you have any questions about this communication, please do not hesitate to reach out to me directly at deniceh@nationalcasagal.org.

Sincerely,

E. Denice Hairston

E. Denice Hairston
Senior Compliance and Accountability Officer

cc: Paige Beard, Senior State Development Officer