PUBLIC COMMENT & REFORM REQUEST

Child-Welfare Accountability, Documentation, and Family Safeguards

Submitted to	Iowa Council on Health and Human Services
Submitted by	Maggie Mae Carlson | Iowa resident
Date	November 1, 2026
For	November 16, 2026 Council meeting

To the Council Members:

I request consideration of enforceable accountability standards for Iowa child-welfare investigations, family services, and contracted providers. The central principle is straightforward: when families are required to document compliance, the state and its contractors should also be required to document the services, contacts, tests, and decisions they report.

I am submitting systemic policy recommendations, not asking the Council to determine any individual court case. I have intentionally excluded children's identities and confidential case materials from this public statement.

1. Verify home visits and drug-testing procedures

- Require reliable, time-stamped documentation of each worker visit, including arrival, departure, service provided, and reasons for any missed or shortened visit.
- Record drug-test requests, actual collection opportunities, results, and chain of custody; clearly distinguish a parent's failure to test from a worker or provider failing to offer or complete the test.
- Establish documented notice and prompt alternative testing options when an assigned testing method cannot reasonably be completed. Evaluate agency-issued body cameras for visits with strict privacy and child-safety safeguards.

2. Protect the integrity and accessibility of records

- Preserve original reports, visit logs, test records, communications, and any authorized recordings in secure systems independent of the individual worker who created them.
- Keep audit trails showing additions and corrections rather than permitting silent alteration or replacement. Provide timely access to records to the extent allowed by law, with appropriate protections for children and confidential information.

3. Establish independent retaliation review

- Provide a clear complaint process outside the chain of command of the worker or supervisor involved. Require an impartial review, documented findings, and protection against retaliation for making a good-faith complaint.
- Where appropriate, assign a trained, neutral worker temporarily while a credible complaint is reviewed; impose meaningful employment, contractual, or statutory consequences for substantiated misconduct, with due process.

4. Measure staffing continuity and contracted-service performance

- Track repeated worker reassignment, missed contacts, and disruptions in services. Require complete case handoffs so parents do not have to repeatedly reconstruct their history for each replacement worker.
- Set transparent performance requirements for state employees and contractors, with corrective action when documented patterns of preventable turnover or missed services harm service delivery.

5. Safeguard family contact and placement decisions

- Require written, reviewable reasons for restrictions on family and sibling contact, consistent with existing court orders and each child's safety and welfare.
- Require conflict-of-interest screening and independent review when a worker, contractor, caregiver, or placement decision-maker has a personal interest in a child's foster or adoptive placement.

Specific action requested from the Council

I respectfully ask the Council to:

- Accept and distribute this statement to Council members as public comment.
- Request an HHS assessment of present safeguards, gaps, implementation costs, and independent oversight options for these five areas.
- Consider placing child-welfare accountability on a future Council agenda or referring it to an appropriate child-and-family-services advisory body.
- Identify which changes could be made administratively and which should be recommended to the Iowa General Assembly for legislation.

This request concerns the Council's advisory responsibilities under Iowa Code sections 217.3 and 217.3A. It does not seek findings about any pending litigation or individual juvenile matter.

Respectfully submitted,
Maggie Mae Carlson