



**David A. Hansell, Commissioner**  
**Testimony to the New York City Council**  
**Committee on General Welfare**  
**June 14, 2017**

***"Int. 1590-2017, Int. 1598-2017, Int. 1601-2017, Int. 1607-2017, & 1609-2017"***

Good afternoon Chair Levin and members of the General Welfare Committee. I am David Hansell, Commissioner of the New York City Administration for Children's Services. With me are Andrew White, Deputy Commissioner for Policy, Planning and Measurement, Jacqueline Martin, Deputy Commissioner for Preventive Services, and William Fletcher, Deputy Commissioner for Child Protection. I am pleased to be back before the Council, just a week after you passed the FY 2018 budget. Thank you for the opportunity to share with you the work that is underway at ACS in protective and preventive services, and to discuss the child welfare bills on the agenda today.

### **Casey Family Programs Report**

When I began my service as Commissioner –one hundred days ago – I immediately initiated a top to bottom review of ACS, paying special attention to our preventive and protective functions. As part of my review, I continued and refocused ACS' engagement with Casey Family Programs, a nationally recognized child welfare organization, to complete a comprehensive assessment of ACS' child safety initiatives, policies, casework practice, and decision-making processes. The key findings and recommendations from their review were encapsulated in a report which was released last week, and I would like to take a moment now to discuss the findings and recommendations in the report.

Overall, Casey found that ACS performs well in relation to other large urban child welfare organizations, and other child welfare jurisdictions in New York State. Casey determined that ACS has a strong and well-supported child welfare system with

impressive safety-related practices and initiatives in place. In our investigative practices, they found ACS performed well in critical areas, including our home environment and child safety assessments, which benefit from our use of clinical consultants – subject matter experts in substance abuse, domestic violence and mental health. Casey also found strong protocols in place for collaboration between ACS and other city agencies, as well as an impressive commitment to multidisciplinary support for investigations. They found that ACS caseworkers perform well when assessing family environments – assessing the vulnerability, well-being and needs of children; determining parents’ or caregivers’ ability to recognize and provide for children’s needs; and responding with urgency to any unsafe conditions. And once family needs have been determined, our Child Protective Specialist (CPS) staff do well in using data to connect families to appropriate services.

Casey also recognized that New York City is a national leader in preventive services. Unlike other jurisdictions, ACS excels at both linking families with services and tracking whether families actually engage in them. We also are leading the way in implementing evidence-based preventive models—many of which address trauma in accordance with accepted best practice—and which comprise 25% of our preventive services. They also noted that child welfare-involved families in New York City have a substantially lower rate of repeat maltreatment within six months as compared to the rest of the state (9.8 percent compared to 13.0 percent, respectively). We have also seen a decline in repeat maltreatment when families are engaged in preventive services.

In addition to acknowledging what we do well, Casey also identified areas of opportunity in which ACS should improve, such as strengthening practice regarding the consideration of prior reports and behavior patterns in investigations, timely supervisory and managerial follow-up, and the organization and dissemination of policy guidance to front-line staff. Casey issued a set of twelve recommendations for strengthening our practice, all of which I have accepted. Work is already underway to implement many of them, and others will guide our effort going forward. New investments in the FY18 budget will support this implementation, as I will explain shortly.

As Casey recognizes and as we in the City acknowledge, safeguarding children cannot be accomplished by one city agency, but must be a shared responsibility. They recommended the development of a mayoral multisystem citywide response to child safety, in partnership with the community. This effort is well underway, through the Children's Cabinet and through our work to strengthen our direct partnerships with other City agencies. In just the past three months, we have:

- Expanded our collaboration with the NYPD in multiple ways, through our revitalized ChildStat program, our Neighborhood Coordination Officer partnership, and our coordinated investigatory work;
- Executed a new Memorandum of Understanding with the Department of Homeless Services that builds on our existing practices to enhance coordination between our agencies and our providers, and to better support ACS-involved families residing in the shelter system; and,

- Re-launched our citywide safe sleep campaign in partnership with the Department of Health and Mental Hygiene, focusing particularly in neighborhoods that are disproportionately impacted by sleep-related fatalities.

Other key recommendations from Casey are that ACS should closely examine the interaction between CPS staff and preventive providers, and strengthen ACS support for and the capacity of our contracted preventive service providers. In the area of child protection, Casey calls for ACS to look beyond the number of cases a CPS worker is handling in order to understand their actual workload. Although ACS has some of the lowest caseloads among major child welfare jurisdictions, we also know that the caseload metric doesn't always reveal the full story. By taking into account all of their job-related duties—including making contact with all of the children and family members involved in a case, handling paperwork, going to court, and seeking professional consultations, we can better assess the real impact of our staffing and case management levels. I will talk more about our work to address this, including an initiative funded by the adopted FY18 budget.

I'd like to thank Casey Family Programs for their comprehensive review and assessment, and I look forward to working with our partners on implementing all of the recommendations.

### **FY 2018 Budget & New Initiatives**

As I also discussed during my budget testimony last month, I have met with hundreds of our frontline ACS staff and with most of our provider partners to gain a deeper understanding of the challenges staff face in their day-to-day work. I have

received their valuable feedback on ways to improve practice and strengthen supports for staff, much of which has already been woven into the reforms and investments in child welfare that we have announced in the past 100 days.

Since I became Commissioner, I have focused the agency on tightening our safety net for children and families. Thanks to the commitment of Mayor de Blasio and the Council, the City's FY18 budget provides ACS with an extraordinary investment of \$54.7 million in new funding for child welfare initiatives to help with this effort. Many of these align with both Casey's recommendations, and the bills that are the subject of this hearing.

#### *Preventive Contract Adjustments*

Currently, ACS contracts with 56 organizations to provide a total of 18 different service models of preventive services. Our current capacity of approximately 13,000 slots will expand by Fiscal Year 2019 to approximately 16,000 slots. ACS has heard from the provider community that many of the existing funding models do not cover the full cost of delivering quality services and that the salaries and staffing structures are inadequate to retain and support the staff that providers need. We share this concern, and appreciate the Council's support in addressing it robustly in the FY18 budget. Building on the City's non-profit resiliency work, ACS has made a commitment to review and modify the bulk of our preventive budgets. We recognize that our providers' budgets may not always reflect the requirements and complexities of the model they are delivering. To that end, ACS is developing a process to review the budgets of different

models of preventive services, which include general preventive programs, family treatment and rehabilitation, certain evidence-based programs, and Beacon Programs. The review will focus on our expectations around the cost and quality of services, and whether existing budgets need adjustments or additional funding to ensure that requirements can be met. We expect to begin engaging providers in that process in the very near future.

The FY 2018 Budget allocates \$26 million for adjusting funding to our contracted preventive providers, where this review determines that an adjustment is necessary. Our review and assessment will also guide the next preventive services RFP, which we anticipate to release by early 2019. This work is being done in conjunction with the Office of Management and Budget and builds upon Mayor de Blasio's commitments in ACS' FY 18 Executive Budget that I discussed last month – including \$11.2 million to support 147 new facilitators for our provider programs who will help implement new case conferencing protocols and \$2.45 million that will allow preventive agencies to send staff to required training each year.

#### *Workload Assessment and Demonstration Project*

As I have said repeatedly since I assumed this role, there is nothing more important to our success than making sure we are doing everything possible to support our frontline CPS workers. To that end, we are embarking on a multi-faceted effort to address CPS working conditions, improve morale, and decrease attrition. To directly

address Casey's recommendation that we more fully and appropriately assess workload impacts, ACS will be conducting a workload study with funding in the adopted FY18 budget, so we can better understand the key areas of workload strain and develop effective case management and assignment mechanisms that take into account factors that affect the complexity and intensity of a case, such as family size, travel distance and court engagement. ACS will work with a vendor to revamp our existing workload model, which is based on a study from nearly 30 years ago.

Using internal resources, we are also exploring ways to address staffing needs, by restructuring work in our Division of Child Protection Borough Offices and speeding up hiring. DCP will launch a demonstration program in a Bronx zone to hire 17 caseworkers who will handle administrative tasks with the goal of allowing CPS to focus more on direct family engagement and higher-quality practice. We are also creating a dedicated unit in our human resources office that will expedite the process for new CPS to be hired. As I announced in the Executive Budget Hearing, we hope that other initiatives like equipping CPS with tablet devices and providing other technology-based tools will promote productivity and alleviate workload stress.

### *Innovating and Bolstering Training & Professional Development for Child Protection Staff*

Training and continued professional development are essential components for ensuring our staff are well-equipped on day one in the field, and have the most effective tools and skills to effectively engage families and protect children. To that end, we are

allocating \$3.8 million to partner with the City University of New York (CUNY) to redesign our initial trainings for newly hired CPS and Supervisors. The curriculum will provide for more real-life experiential learning, coaching supports and on-the-job training, as well as individualized assessments. We also recognize the need to better assist our new CPS with the transition from the Training Academy to the Field Office. The adopted FY18 budget provides an additional \$900,000 to hire ten staff development coordinators—one for each of our Borough Offices—who will help identify staff development needs and will coordinate between the borough offices and the Workforce Institute to help ensure that fundamental training is carried forward in practice and that specialized training on issues like domestic violence and mental health is developed as needed.

#### *Supporting CPS Retention, Morale, and Well-Being*

There are few positions in public service as unique, demanding and rewarding as those of our CPS workers—they truly are our city's unsung heroes, our child safety first responders—and we want to help the public understand that. The FY18 adopted budget allocates funds for a new campaign to increase public and professional recognition of CPS workers, and to recruit new CPS. We will also do more to honor our CPS workers internally through staff appreciation activities that acknowledge their contributions. To support the well-being of frontline staff who handle particularly difficult or stressful cases, we have executed an agreement with the Office of Labor Relations for additional counselors for the Employee Assistance Program (EAP) to specifically support our child

protection workers. We are proud to partner with EAP, a lifeline for city employees, which will organize and offer programs that address exposure to trauma, coping with challenges, and building resilience.

These important investments and initiatives would not be possible without the Mayor's commitment and the Council's support through the budget process, and I am deeply appreciative. I look forward to updating you on the implementation of these initiatives, and the progress we achieve, in the coming months and years.

### **Council Bills**

I hope I have demonstrated that, through our recent budgetary and programmatic initiatives, we are moving forward in the areas of concern to the Council, as embodied in the legislation that is the specific subject of this hearing. I believe we share the same goals and spirit as the Council in this area, but we do have significant concerns about the prescriptiveness of some of the legislation, which we believe may not ultimately have the intended impact, and may even inhibit our efforts toward reform.

### **Preventive Services**

#### **Int. 1590: Training for Preventive Services Employees**

As Casey recognized, ACS has built a robust network of preventive services and community resources to support families in our child welfare system. ACS' non-profit providers are among the best in the nation, and I am proud to partner with them in serving the City's children and families. We hold our providers to high standards, and

we recognize that in order for them to provide the highest quality services, they must be appropriately trained and adequately supported. As I've explained, the FY18 budget supports that commitment through significant investments to support the preventive services workforce, and specifically by providing the necessary financial supports for our providers to enable staff participation in mandated annual training. Through the ACS Workforce Institute, we are developing a new 12-day curriculum that will train new preventive agency staff. The curriculum will consist of a new two-day course available once a month for all new preventive staff before they take any cases, followed by an additional ten-day course provided every other month, which new staff will complete within two months of hiring. These courses, which also include training on safety and risk, will begin later this year and will be available throughout the year on an ongoing basis. As I mentioned earlier, \$2.45 million of new funding will be available to preventive agencies so that they can send all of their frontline staff to six days of required training each year.

Int. 1590 would require ACS to provide training on identifying and reporting suspected physical abuse and neglect to all preventive services workers before the individual begins to provide services, and would also require ACS to ensure that all individuals providing preventive services attend at least two trainings per year, the content of which ACS would determine. While ACS is not opposed to this bill in concept, we believe the legislation is not necessary for the following reasons.

First, New York Social Services Law and regulations of the State Office of Children and Family Services (OCFS) already mandate ACS staff to participate in Mandated Reporter training, and set out detailed requirements for the content of the training. Thus this bill may be preempted by state law and regulations. In addition, as described above, our FY 2018 budget provides resources for a new 12-day onboarding curriculum through the ACS Workforce Institute for new preventive agency staff. Moreover, ACS is going beyond the mandate of this bill and funding our agencies to cover the actual expenses associated with allowing all frontline preventive workers to participate in trainings every year.

#### Int. 1598: Preventive Services Surveys

Int. 1598 would require ACS to provide to all families receiving preventive services an annual survey regarding the family's experiences with each preventive services provider that provided services to them during the preceding calendar year, and to produce for the Council an annual report of aggregate data obtained from the surveys.

ACS values assessment of the experiences of our families and is not opposed to surveying families, but we have concerns about this bill as drafted. First, the bill requires ACS – rather than our providers – to send the surveys. Given that many families' initial involvement with ACS involves Child Protection, we are concerned that families may perceive the notices to be part of an investigation and be less inclined to participate.

Since many families develop a strong relationship with their preventive agency, we would propose that the survey be issued by the agency.

Second, there are significant costs associated with this bill which, without funding, will create workload issues for ACS and unfunded mandates for our preventive service providers. Third, rather than survey every one of the approximately 20,000 families that receive preventive services each year, we believe that collecting statistically valid data from a sample of families would produce results of high quality for a public report with far less expense and burden.

Given these concerns, ACS proposes having preventive providers conduct the surveys at the time a family concludes its involvement with the provider, and that ACS be permitted to collect data from providers, representing a statistically significant sample of families rather than all families who received preventive services. We are happy to work with the Council to refine this bill.

## **Child Protection**

### Int. 1601: ChildStat

One of my first areas of focus after my appointment was to restructure and reinvigorate ChildStat—a quality assurance tool for child protection operations. We embrace ChildStat as a vital approach to strengthening the agency's focus on performance accountability around child protection, and to building a more unified culture of excellence in practice across all five boroughs. The newly restructured

ChildStat launched last month and is the result of extensive review and analysis of previous iterations, observation of the NYPD's CompStat, and incorporation of best practices from other jurisdictions.

This legislation would lock ACS into a rigid ChildStat model, and strip ACS of the flexibility to modify the quality assurance tool as best practices emerge and child welfare practices evolve. We are concerned that the detailed codification of an Executive agency's internal quality improvement system, and of specific operational and administrative methods and practices, extends beyond the normal scope of legislation. Int. 1601 seeks to legislate every aspect of ACS' ChildStat sessions—from the frequency of the meetings and the staffing of the meetings, to the information to be reviewed and the data to be collected. ACS is strongly opposed to this approach. We believe the model just implemented meets the goals of this legislation, and that the Council's ongoing oversight authority would enable it to address any deviations that a future Administration might make. At most, we would instead propose that Council mandate ACS to implement a detailed quality improvement program, and provide routine updates to the Council to ensure that it is robust and meaningful.

Int. 1607: CPS Caseloads and Child Safety Conferences

Int. 1607 would amend Local Law 20 of 2016 to require ACS to report additional data relating to the caseloads for CPS workers and certain child protective procedures, including Child Safety Conferences and removals of children. As I discussed earlier, we accept Casey's recommendation that we look at alternative measures that truly reflect

CPS workload rather than simply caseload, and in line with their recommendation, ACS will be conducting a study that will yield metrics to better define caseloads and make corresponding workload changes. We are also in the midst of redesigning our case assignment data system, which will incorporate best practices that are different from those described in this bill. In its current form, this legislation would lock the agency into specific definitions that would prevent us from implementing the knowledge we gain from the workload study, other jurisdictions, and our own experience—that will likely more accurately reflect the specific work conditions of our CPS.

Second, ACS does not have the technical capacity to report on a substantial amount of the information the legislation requires, and would need to work with the Council to devise provisions that better align with ACS' data collection capabilities, limitations of the statewide system of record, and mechanisms by which ACS currently generates automated reports. Third, New York State already prescribes that all local social services districts use a different caseload measure, which would be inconsistent with that proposed in this bill.

#### Int. 1609: Accountability Review Panel Report

Int. 1609 would require ACS to produce an annual report on the aggregate findings and recommendations of the agency's Accountability Review Panel (ARP). While ACS is not opposed to regular reporting on child fatalities, we would request some flexibility in the reporting structure. We would also like to work with the Council to devise language that aligns with ACS' capacity to produce reports.

ACS created the Accountability Review Panel for internal quality improvement purposes and the methodology, composition, name, and even the panel itself are subject to change over time to accommodate best practices. We propose that the legislation not be specifically linked to the “Accountability Review Panel”, but instead focus on the desired outcome: an annual report on child fatalities in New York City that are known to the ACS child welfare system, with recommendations for systemic change resulting from review of those fatalities. We would also need a longer time frame for producing a report, as “45 days after the end of the year” is not a sufficient timeframe to obtain all the information needed for the report, especially pertaining to fatalities that occur at the end of the year. For example, information from the Office of the Chief Medical Examiner (OCME) is essential to produce a report on fatalities, but the Medical Examiner’s office frequently takes many months, or even longer, to finalize its reviews. In order to ensure that OCME reports for fatalities are received in time for inclusion in an annual report, we propose extending the timeframe for producing the report to 18 months from the end of the year.

### **Conclusion**

Before I close, I want to share a development in foster care, which is not directly related to these bills, but I know is important to the Council and to this Committee. The Interagency Foster Care Task Force, established by the City Council and signed into law by the Mayor last fall, is meeting for the first time later this month. The Task Force comprises myself, Speaker Mark-Viverito, Chair Levin, Public Advocate James, and five city agencies—HRA, DOE, DYCD, Health, and NYCHA—along with representatives

from the parent community, advocates and providers, and of course, young people involved in the foster care system.

As you know, the goal of the task force is to develop recommendations to improve services for youth in foster care and promote better outcomes for young people aging out of care. The Task Force is charged with making recommendations on a wide range of domains including education, housing, mental health, and employment. We thank the Council for appointing members and I look forward to working with you, Chair Levin, and the group to further our commitment to our young people, and to develop a new schedule for completing the Task Force's work.

As I mark 100 days with ACS, I would like to thank the Council for your support and partnership as we work to promote safety, stability and well-being for children and families across the City. Just as importantly, I thank you for your advocacy on behalf of ACS' frontline staff and our non-profit provider staff. We appreciate the opportunity to discuss the Council's proposed legislation and the work that is currently underway at ACS that address the needs these bills aim to meet. We look forward to working with you to refine the legislation so it can best serve the interests of our children and families, and the dedicated workforce who serve them. I am happy to take your questions.

# CATHOLIC COMMUNITY RELATIONS COUNCIL

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**Testimony of Joseph Rosenberg, Executive Director  
Catholic Community Relations Council  
In Support of Res. No. 1462  
before the New York City Council Committee on General Welfare  
June 14, 2017**

Good afternoon Chair Levin and members of the New York City Council Committee on General Welfare. I am Joseph Rosenberg, Director of the Catholic Community Relations Council (“CCRC”), representing the Archdiocese of New York and the Diocese of Brooklyn on local legislative and policy issues. I am here in strong support of Resolution No. 1462 which calls for the passage of the Home Stability Support plan.

Homelessness is one of our society’s most intractable challenges. Many strategies including legislative reform, financial commitment and social change are required to confront and resolve this ongoing crisis. Charitable organizations and houses of worship serve an important role in this effort. One of the most basic principles of Catholic social teaching is to preserve the dignity of people. To that end, focusing on the prevention of homelessness and sheltering of the homeless has been a long standing priority of the Church. Catholic Charities of the Archdiocese of New York and Catholic Charities of the Diocese of Brooklyn have embraced the important mission of assisting this population by providing many programs, and preserving and developing housing concentrating on this specific need.

The significant and timely capital funding commitments from Mayor de Blasio, Governor Cuomo and the City Council to preserve and develop supportive housing will go far in providing housing for families and individuals at risk of homelessness and those already in shelters. The Right to Counsel in Housing Court initiative, championed by the City Council and the Mayor, is also a crucial tool to assist in abating the homeless crisis. But, everyone searching for solutions to this challenge knows that more is needed.

The Home Stability Support (“HSS”) program is another source of redress. Sponsored by Assembly Member Hevesi, this State-wide program would help to prevent the displacement of families and individuals who are eligible for public assistance and are facing eviction from their homes. Victims of domestic violence facing possible homelessness would also be covered by the program. The Home Stability Support program would assist this vulnerable population by providing a rental supplement intending to bridge the current inadequately low shelter allowance. It would cover up to 85% of the fair market rent and will replace all existing optional rent supplements. Localities would also have the ability of providing additional subsidies that would help this supplement cover 100% of the fair market rent as determined by HUD.

This program is a cost effective alternative to the placing of families in hotels and homeless shelters. Most importantly, HSS provides a humane approach to confronting and preventing homelessness as opposed to the destructive effect that shelter living can have on families and children. The Home Stability Support program will help keep these families in their homes. That is why we support this Resolution and urge its passage.



Testimony of

Stephanie Gendell  
Associate Executive Director,  
Policy and Advocacy

Before the  
New York City Council  
General Welfare Committee

*Child Welfare Bills:  
Int. Nos. 1590, 1598, 1601, 1607 and 1609  
Reso 1462 in support of Home Stability Support*

June 14, 2017

Good afternoon. My name is Stephanie Gendell and I am the Associate Executive Director for Policy and Advocacy at Citizens' Committee for Children of New York, Inc. (CCC). CCC is a 73-year-old, independent, multi-issue child advocacy organization dedicated to ensuring every New York child is healthy, housed, educated and safe.

I would like to thank City Council General Welfare Chair Stephen Levin, as well as the members of the City Council General Welfare Committee for holding today's oversight hearing on five bills related to child welfare. I would also like to take this time to thank the City Council for its ongoing commitment to and partnership in strengthening the child welfare system. Finally, I would like to thank the sponsors of Intros. 1590, 1598, 1601,1607 and 1609, Council Members Cabrera, Levin, Rose and Salamanca, for introducing legislation aimed at keeping children safe, ensuring families receive high quality services, and better supporting the child welfare workforce.

CCC would also like to thank the Administration for Children's Services (ACS) and its relatively new Commissioner, Commissioner Hansell, for the commitment to examining its system and strengthening services where appropriate. The recently adopted budget is a testament to these efforts, with new investments in training for preventive service caseworkers, slots for preventive services, additional, child protective staff, and engaging in a model contracting process with preventive providers to address the system's underfunding. CCC also applauds Commissioner Hansell for reinstating ChildStat, a child safety oriented oversight mechanism developed by former Commissioner Mattingly.

CCC generally supports the goals and intent of all five pieces of legislation. We appreciate the need to legislate policies and procedures so that a change in administration does not result in the end of a good practice. In general, however, we urge the City Council to work with the administration to ensure final versions of these bills are not overly prescriptive to ACS, an agency that needs to be able to adapt its policies and procedures to changes over time. In addition, we suggest that the Council work with ACS to ensure there is an appropriate balance between the need for information and the time and cost of producing numerous reports and survey results. We now address each piece of legislation individually:

*1) Int. No. 1590: A local law to amend the administrative code of the City of New York, in relation to training for preventive service employees:*

This bill would require preventive service caseworkers to attend training provided by ACS on, at a minimum, identifying and reporting suspected physical abuse and neglect. The bill goes on to say, "ACS shall also require all such [preventive service caseworkers] to attend trainings, the content of which shall be determined by ACS, at least twice per year."

CCC has long-supported the need for preventive service caseworkers to have training, that there be training required prior to a caseworker beginning to work with any family, and that there be ongoing training for the preventive service workforce.

While we therefore, support the intent of this legislation, we are concerned that it is both overly prescriptive and too broad:

- We agree that preventive service caseworkers should receive training in identifying and reporting physical abuse and neglect. We believe this training should encompass all types of abuse, including sexual abuse.
- While ACS is one potential provider of this training, we urge the City Council not to limit the provision of this training to ACS, as the state OCFS or other organizations might also be able to provide this training. We suggest not prescribing who would deliver the training.
- We believe that preventive service caseworkers need training beyond how to identify abuse or neglect before they begin their jobs. This training should also include components such as engaging families, assessing safety and risk, referring families to services, and working with those who have experienced trauma. As the elements of a comprehensive pre-service training are likely to change over time, we suggest that the legislation not be specific in this regard.
- The legislation also requires ongoing training at least twice per year, as determined by ACS. We suggest that the legislation just require ongoing training, as two times per year is both broad and overly prescriptive.

ACS's recent budget testimony described the training that they are envisioning for preventive staff and it included both pre-service training and ongoing training, and it reimbursed providers for the time staff is in the training. We therefore believe that ACS is moving in the right direction and that at this time it would be best for this legislation to merely require preventive service workers to receive training both before they begin working with families and then in an ongoing manner.

*2) Int. No. 1598, a local law to amend the administrative code of the city of New York, in relation to preventive services surveys*

This legislation would require ACS to administer annual surveys to all families receiving preventive services during the preceding calendar year. The questions would be with regard to the following: interactions with caseworkers, the type and quality of services, and suggestions for how services may be improved. There would also need to be a space for families to provide ACS with any additional information they wish to share.

CCC appreciates the intent of this legislation. We understand that it is important for ACS to know how the consumers of preventive services feel about the programs and services in which they are participating.

That said we have some concerns about the legislation:

- Parents who are participating in preventive services are often fearful of ACS and may be uncomfortable and nervous about completing a survey.
- Similarly, parents who are concerned about their immigration status or the immigration status of their children may also be fearful of a government survey.
- The bill would require the survey be administered to every family that had a case in the preceding calendar year, even if their case has been closed. These families may not appreciate having ACS following up with them after the case is closed.
- The development, administration, and analysis of a survey of this nature would be very expensive for the City.

We believe that there may be some alternatives to address the intent of this legislation to a) enable parents receiving preventive services a mechanism to provide anonymous feedback to ACS and b) ensure ACS has information from the families about the quality of the services they are receiving. These ideas include:

- Surveying a sample of parents at all of the preventive programs.
- Creating a publicized mailbox (physical and online) for parents to submit comments, concerns and positive feedback to ACS about their preventive program (and then require ACS to provide the City Council with a report on these comments).

*3) Int. 1601, a local law to amend the administrative code of the city of New York, in relation to Childstat meetings.*

This law would require the ACS Commissioner to coordinate weekly meetings (at a minimum) that includes a comprehensive review of practices in one zone. The legislation is specific about who must attend the meetings (Commissioner, at least one Deputy Commissioner, the borough commissioner for the borough where the zone under review is located, and the director or deputy director of operations for the zone under review. The meeting would be required to look at data indicators and one randomly selected open case. The Commissioner would then need to submit a report to the Council indicating data trends and any agency practices created, reformed or ended as a result of the meetings.

CCC strongly supports the intent of this legislation and we are very pleased that the new Commissioner has returned the ChildStat model to be much more similar to the original model.

That said, we are concerned that the legislation is very prescriptive and does not give ACS latitude to change its staffing pattern, nor the opportunity to for example review closed cases if the agency believed this to be warranted. In addition, while we strongly believe that the Commissioner should attend these meetings, the Commissioner could have an emergency and/or obligation scheduled making attending every week impossible. We would appreciate having legislation that mandates ChildStat, but is a little less prescriptive with regard to who must attend and what must be addressed at the meetings.

*4) Int. No. 1607, a local law to amend the administrative code of the city of New York, in relation to requiring the administration for children's service to report more information regarding the caseloads of its front line workers and child safety conferences.*

This legislation amends an existing reporting bill (Local law 44 of 2013) to expand the child protective caseload data report to:

- Include caseworkers in the emergency children's services unit, child advocacy centers, and office of special investigation.
- Provide more detailed information about the experience level of caseworkers by breaking down the 1-3 years of experience component in the current law to be "less than 1 year", "up to 1 year," and "over 1 year-up to 3 years."
- Provide median caseloads in addition to average caseloads.
- Include active cases, as well as cases post investigation where the caseworker is still assigned and/or appearing in court.

- Provide the number of caseworkers whose caseloads are over 12 active investigations, rather than the current requirement of 15. In addition, include those who have a caseload of 12 or more active investigations and one or more post-investigation case.
- Include the number of workers in the family services unit providing court ordered supervision, as well as their mean and median caseload sizes.
- Provide the number of case conferences held disaggregated by the type of case, whether there was an emergency removal, and if there was a removal whether the removal took place before or after the child safety conference.

It is critical for the City Council, advocates and New Yorkers to know caseloads for ACS staff, and that they be reported in a manner that shows not only caseload but workload. CCC supports this legislation with the caveat that the Council work with ACS to develop a methodology that accomplishes the goals of the legislation without being overly burdensome.

*5) Int. No. 1609, a local law to amend the administrative code of the city of New York, in relation to requiring the administration for children's services to report annually on the aggregate findings and recommendations of its accountability review panel.*

This legislation requires ACS to issue an annual report of the accountability review panel findings within 45 days after the end of each calendar year.

Again, CCC support the intent of this legislation. New Yorkers, the City Council and advocates need the opportunity to review the findings and recommendations of the reviews of fatalities of children known to ACS.

We have several concerns with the legislation as drafted:

- The timeline in the proposed legislation will not be manageable for ACS. Forty five days after each calendar year is too soon for ACS to be able to publish a report from the prior year. ACS needs to be able to wait for the findings of the Medical Examiner before completing its intensive review into a child fatality and this often takes longer than 45 days. Similarly, ACS needs some time after receiving the ME report to conduct the work of the panel and then create the findings and recommendations.
- We need to make sure that legislation requiring these types of findings and recommendations be made public does not stymie ACS staff from being inclusive of all findings and recommendations.

CCC suggests that the City Council amend this legislation to require ACS file annual reports (from a timeframe that works for ACS) that includes factors about fatalities, but does not intrude on the accountability review process. For example, the Council could require a report that includes: number of fatalities of children known to ACS; cause of death; age/gender/race/ethnicity of children; and a summary of case practice findings and systemic changes made in response to the cases for the year.

*Reso 1462-2017*

CCC supports the City Council Resolution 1462-2017, which is in support of the state legislature passing and the Governor enacting Assembly member Hevesi's Home Stability Support program (HSS). HSS would go a long way towards addressing the homelessness crisis by creating a statewide rental assistance program. CCC appreciates the City Council's support, urges the Council to pass the resolution, and we look forward to collaborating in our advocacy efforts to make HSS the law.

*Local Law 1374-2016*

Finally, CCC also urges the City Council to pass Int. 1374-2016, which would provide details about preventive services utilization by program type. A hearing was previously held on this piece of legislation, which would complement the preventive services legislation being discussed at today's hearing

*Conclusion*

CCC looks forward to working with the City Council, ACS and the Administration to pass legislation that ACS continues on the course of maintaining and implementing best practices, such as ChildStat and training for preventive service caseworkers, and provides more data to the public about child protective caseloads, preventive service quality, and child fatalities.

Thank you to the City Council for introducing this legislation and for the opportunity to testify.



Leadership, voice and vision for child welfare in New York State

TESTIMONY SUBMITTED TO  
THE NEW YORK CITY COUNCIL  
COMMITTEE ON GENERAL WELFARE  
PRELIMINARY BUDGET HEARING  
Wednesday, June 14, 2017

Sophie Charles PhD.

Director of Preventive Services

Council of Family and Child Caring Agencies

Good afternoon, Chairperson Stephen Levin, and members of the New York City Council General Welfare Committee. My name is Dr. Sophie Charles and I represent the Council of Family and Child Caring Agencies, also known as COFCCA, and our CEO Jim Purcell. COFCCA represents over fifty New York City child welfare agencies, organizations that provide foster care and child maltreatment prevention services to many thousands of families. Our members range from large multiservice agencies to small community-based preventive services programs in community districts around the city. We will be commenting on three of the proposed amendments to the administrative code of the City of New York: 1) Int. No. 1590 (Training for Preventive Services Employees), 2) Int. No. 1598 (Preventive Services Surveys), 3) Int. No. 1601 (Childstat Meetings), and 4) Int. No. 1607 (Reporting on Caseloads of Front-line Workers and Child Safety Conferences).

**Int. No. 1590 (Training for Preventive Services Employees)**

We appreciate the Council's efforts to embed training mandates within the NYC administrative code, we believe requiring training for frontline staff is a necessary and good policy. We also know, however, that it would be onerous and severely limiting to impose an "ACS Only" training directive upon a



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government agency that currently relies upon the partnerships of other organizations to meet the training needs of thousands of contracted preventive caseworkers and also expect ACS to maintain ongoing development of its child protective staff.

We ask the City Council to expand the range of training portals beyond ACS to include other experienced organizations with well-documented track records for developing core casework skills and competencies in child welfare staff in both nonprofits and government organizations. Hence, provider agencies should have more than one option available to assist their staff in developing the skills needed to protect children from abuse and neglect. For several decades, a significant number of well-qualified organizations have delivered a full continuum of child welfare courses designed to prepare workers to identify, detect, and address suspected physical, sexual, and emotional child abuse and neglect.

For more than 25 years, through a training grant from the New York State Office of Children and Family Services (OCFS), COFCCA has played a vital role in delivering child safety, risk assessment, mandated reporters' training, and a Common Core Curriculum for caseworkers and supervisors employed by ACS and provider agencies. COFCCA's Training Consortium is comprised of more than 50 agency training directors across New York State. We have been at the forefront in responding to requests to train new caseworkers and we work closely with ACS and OCFS. In many instances, we train more frontline preventive staff than any other training organization in New York State. In recent months, COFCCA's Director of Training has been an active participant in ACS' Workforce Institute, a training collaborative with the City University of New York, to support the training and development of its workforce and the staff of provider agencies. We have been working with ACS to design and deliver a 2-day on-boarding



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course with an overview of child welfare in New York City that includes mandated reporters' training, child safety and risk assessments, and all the major components required for new caseworkers to keep children safe.

While we know that it is essential for ACS to have a first responder's role in the development and delivery of training for new caseworkers, we also think it is important for the Council to understand that ACS relies on a host of training partnerships, particularly, many within the provider community, to achieve its training objectives. Due to ACS' limited scale and capacity, they are not positioned to train all child welfare caseworkers in New York City. Organizations such as COFCCA, New York Foundling, Good Shepherd Services, The Children's Aid Society and many others have long been supporters of ACS' training efforts. The various training partners are members of COFCCA's Training Consortium and communicate quarterly to ensure that there is consistency in training content. It is important to keep the training door open to these ongoing partnerships.

**Int. No. 1598 (Preventive Services Surveys)**

We applaud the Council for understanding the importance of obtaining feedback from the children and families who receive preventive services from agencies delivering child protection and family preservation services. We believe that the concept of "consumer satisfaction" is an essential factor in gauging the quality of services, measuring staff's professionalism, and a method of assessing the quality of clinical engagement with families. We also know that families enter the corridor of preventive services after having traveled through the front door of ACS and they frequently maintain a service relationship with both entities throughout their stay in the child welfare system.



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We ask that the Council consider a comprehensive “customer survey” that reflects the joint and collaborative partnership between ACS and the provider agencies, as families experience overlapping touch points with each sector. The more we know about what families think and feel about the intersection of support they garner from NYC child welfare services, the better we are able to tailor child welfare services to fit their needs. There is a symbiotic service relationship between the provider agencies and ACS, and families often experience both sectors as a unit. We think the Council should also know that the majority of the provider agencies have historically distributed “consumer satisfaction” surveys to their families and frequently share such data with ACS. It should be noted that “customer satisfaction” surveys can be costly and given their already stretched budgets, the provider agencies, should not be required to pick up any additional cost that might be associated with this deliverable. Moreover, any requirement that ACS post aggregate agency data from surveys on its website, should be reevaluated. If survey results are to be posted on the website there should be some protection for provider agencies to guard against frivolous and slandering feedback. Careful consideration should be given regarding context of survey results, validity of data, and how such data is quantified before presenting data to a public arena.

### **Int. No. 1601 (Childstat Meetings)**

While it does not currently have a direct effect on contract agencies, we encourage the Council to avoid over-regulating the Childstat process. Over the years that ACS has conducted Childstat meetings, the sessions have evolved to incorporate new forms and methodologies in response to research findings, outcomes measurements, process observations, and changes in the environment surrounding and interacting with the child welfare system. Over the years, ACS has also discarded portions of the



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meetings that proved to be unwieldy or not useful. The specific, prescriptive requirements written into Int. No. 1601 would severely limit future Childstat innovation, evolution, and flexibility. We do not want to force ACS to ignore what has been learned through Childstat nor curtail any actions that could improve practice to develop a new, parallel process in addition to Childstat. We would encourage the Council to define *what* it would like ACS to accomplish in Childstat meetings instead of strictly directing *how* ACS should hold the meetings.

### **Int. No. 1607 (Reporting on Caseloads of Front-line Workers and Child Safety Conferences)**

Given that this hearing addresses a number of bills with amendments relevant to preventive services, there are a few data points that are of interest to the Provider Agencies. We ask the Council to consider a request for data points on the following:

- The number of indicated cases that were referred to Provider Agencies **with** ACS contracts to provide preventive services;
- The number of indicated cases that were referred to Community-Based Organizations **without** ACS contracts to provide preventive services (most do not have a child welfare lens);

We believe that there is a distinct difference between the tracking, reporting, and monitoring mechanisms for families receiving preventive services from ACS contracted agencies and those organizations that are not contracted to deliver preventive services to children and families. We believe that data points in this area could potentially provide insight into repeat maltreatment data regarding which cohort of families return to the child welfare system with indicated cases.

Three years ago, the city invested approximately \$10 million dollars to implement evidence-based models into the continuum of services, thereby shifting approximately 40 percent of the preventive system to evidence-based interventions. We think it is important for the Council and provider agencies to receive outcomes data regarding the effectiveness of these interventions. We ask the Council to consider requesting data on the following:

- The number of families with indicated cases that were referred for evidence-based interventions each year;



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- The number of families with unfounded cases that were referred for evidence-based interventions each year;
- The number of families with indicated cases that come back into the child welfare system after having completed evidence-based service interventions and;
- Comparative outcomes data on families with indicated cases that come back into the child welfare system after having completed traditional preventive services versus evidence-based preventive interventions.

We think each of the above data points could go a long way to inform all stakeholders about the value and functionality of the preventive services and the effectiveness of the various preventive models. It is very likely that ACS is already collecting this data and can readily share this data.

In conclusion, we appreciate the important and welcome steps that ACS has taken to support the provider community, and we think the information and action items outlined in the four bills discussed in our testimony will go a long way to better inform practices in preventive services. While the preventive services system functions as an alternative to foster care placement, the safety of vulnerable children served by preventive programs can always be improved to better serve the complex and challenging needs of high-risk families. We at COFCCA would be happy to answer any questions the Council members may have, or to arrange for members to see their local child welfare agencies in action. We thank you for allowing us to submit our testimony.

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Contact Information:

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Sophine Charles, PhD., Director, Preventive Policy and Practice

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[www.cofcca.org](http://www.cofcca.org)

Testimony of  
Coalition for the Homeless

on

Res. No. 1462

prepared for submission to

The New York City Council  
Committee on General Welfare

by

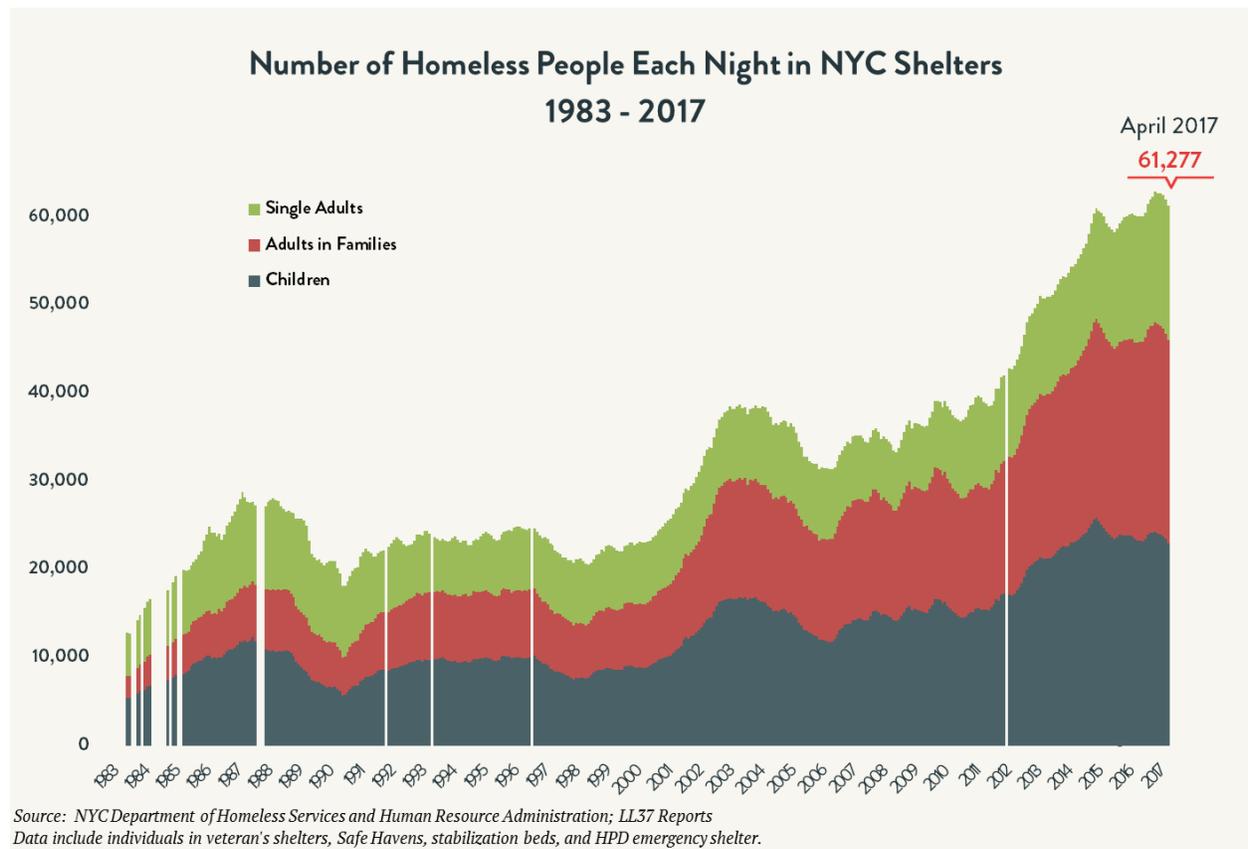
Giselle Routhier  
Policy Director  
Coalition for the Homeless

June 14, 2017

Coalition for the Homeless welcomes this opportunity to present testimony in support of Res. No. 1462 calling on New York State to create and fund Home Stability Support.

### Near-Record Homelessness in New York City

New York City remains in the midst of the worst homelessness crisis since modern mass homelessness first emerged in our city roughly four decades ago. In April 2017, a near-record 61,277 men, women, and children slept in shelters each night – about 1,200 more than in April 2016. The number of children in shelters now is roughly double what it was in the years preceding the Great Recession.



### Home Stability Support

The Coalition fully supports the creation of Home Stability Support and is proud to have been instrumental in its development. HSS would provide much-needed monetary assistance and supportive services to help prevent and end homelessness. It would do so by providing State- and Federally-funded rent supplements to households receiving public assistance who are homeless or at risk of homelessness due to eviction, domestic violence, or hazardous living conditions. Current public assistance rental allowances are extremely and even unlawfully low. By providing additional rent supplements and help with finding and keeping apartments HSS would help families actually afford rents at market rates and remain stably housed. Once fully implemented, HSS is projected to reduce the number of people in shelters by 60 percent in New York City

alone. Enclosed is a full memorandum in support of New York State Assembly Bill A.8178, which would authorize the creation of Home Stability Support.

We thank the Council for the opportunity to testify and look forward to working together on our mutual goal of ending homelessness in New York City.

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## About Coalition for the Homeless

Coalition for the Homeless: Coalition for the Homeless, founded in 1981, is a not-for-profit advocacy and direct services organization that assists more than 3,500 homeless New Yorkers each day. The Coalition advocates for proven, cost-effective solutions to the crisis of modern homelessness, which is now in its fourth decade. The Coalition also protects the rights of homeless people through litigation involving the right to emergency shelter, the right to vote, and life-saving housing and services for homeless people living with mental illness and HIV/AIDS.

The Coalition operates 11 direct-services programs that offer vital services to homeless, at-risk, and low-income New Yorkers. These programs also demonstrate effective, long-term solutions and include: Supportive housing for families and individuals living with AIDS; job-training for homeless and formerly-homeless women; and permanent housing for formerly-homeless families and individuals. Our summer sleep-away camp and after-school program help hundreds of homeless children each year. The Coalition's mobile soup kitchen distributes over 900 nutritious hot meals each night to homeless and hungry New Yorkers on the streets of Manhattan and the Bronx. Finally, our Crisis Intervention Department assists more than 1,000 homeless and at-risk households each month with eviction prevention, individual advocacy, referrals for shelter and emergency food programs, and assistance with public benefits as well as basic necessities such as diapers, formula, work uniforms, and money for medications and groceries.

The Coalition was founded in concert with landmark right to shelter litigation filed on behalf of homeless men and women (*Callahan v. Carey* and *Eldredge v. Koch*) and remains a plaintiff in these now consolidated cases. In 1981 the City and State entered into a consent decree in *Callahan* through which they agreed: "The City defendants shall provide shelter and board to each homeless man who applies for it provided that (a) the man meets the need standard to qualify for the home relief program established in New York State; or (b) the man by reason of physical, mental or social dysfunction is in need of temporary shelter." The *Eldredge* case extended this legal requirement to homeless single women. The *Callahan* consent decree and the *Eldredge* case also guarantee basic standards for shelters for homeless men and women. Pursuant to the decree, the Coalition serves as court-appointed monitor of municipal shelters for homeless adults, and the City has also authorized the Coalition to monitor other facilities serving homeless families.



Memorandum in Support  
June 6, 2017

Re: A. 8178 (Hevesi)

*AN ACT to amend the social services law, in relation to home stability support programs*

Coalition for the Homeless strongly supports this legislation which was developed to prevent homelessness and its most solvable causes through the provision of State and Federally-funded rent supplements for public assistance households. We are proud to have participated in the development of this Home Stability Support (HSS) proposal with the sponsor, and the experts representing the Legal Aid Society, Empire Justice Center, and NYS Coalition Against Domestic Violence. It is widely supported by dozens of members of the Legislature from both houses and both sides of the aisle, as well as scores of other elected officials at every level of government, and over 140 community groups as well as faith leaders.

The bill would create a new Section 131-bb of the Social Services Law to authorize the provision of rent supplements to those public assistance households who are homeless, as well as those at risk of becoming homeless due to eviction, domestic violence, or hazardous conditions in the home. By providing housing assistance to help these households afford market rents, the program would help thousands of individuals and families to retain their homes, and at the same time help thousands of others to relocate from costly shelters, crowded double-ups, and places unfit for human habitation, to homes of their own. It would also offer support services to help individuals and families find and keep their homes.

There are well over 60,000 homeless people staying in NYC shelters each night and 150,000 homeless children statewide. The State has reported to HUD that 19,000 more New Yorkers become homeless each year than exit homelessness. This level of homelessness is unsustainable and far too costly for the poorest New Yorkers and taxpayers alike.

By preventing and resolving homelessness simultaneously, HSS would have the power to reduce the number of people in shelters by 60 percent in NYC, and foster true housing stability for those whose homelessness is rooted in the economics of private housing costs that far exceed the incomes of those receiving public assistance.

Ultimately, HSS would more than pay for itself in savings from reduced evictions, shorter shelter stays, reduced public service costs associated with homelessness, and increased housing stability for public assistance households.

For the foregoing reasons, the Coalition for the Homeless strongly favors this legislation and urges its adoption.

*For additional information please contact Shelly Nortz, Deputy Executive Director for Policy, Coalition for the Homeless at 518-436-5612.*

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

[ ]

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. 1462

in favor  in opposition

Date: 6/14/41

(PLEASE PRINT)

Name: Joseph Rosenberg

Address: 80 Maiden Lane, N.Y.

I represent: Director - Catholic Community

Address: Relations Council

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

[ ]

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 2/14

(PLEASE PRINT)

Name: Toswaki Komatsu

Address: One Penn Plaza

I represent: Self

Address: \_\_\_\_\_

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

[ ]

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Stephane Gendell

Address: \_\_\_\_\_

I represent: Citizens' Committee for Children

Address: \_\_\_\_\_

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: 6/14/17

(PLEASE PRINT)

Name: Dr. Sophie Charles

Address: \_\_\_\_\_

I represent: COFCCA

Address: COUNCIL OF FAMILY + CHILD  
CARING AGENCIES

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: William Fletcher

Address: \_\_\_\_\_

I represent: NYC Administration for Children's Services

Address: 150 William Street, NY, NY 10038

**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Jacqueline Martin

Address: \_\_\_\_\_

I represent: NYC Administration for Children's Services

Address: 150 William Street, NY, NY 10038

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**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: David A. Hensell, Commissioner

Address: \_\_\_\_\_

I represent: NYC Administration for Children's Services

Address: 150 William Street, NY, NY 10038

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**THE COUNCIL  
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. \_\_\_\_\_ Res. No. \_\_\_\_\_

in favor  in opposition

Date: \_\_\_\_\_

(PLEASE PRINT)

Name: Andrew White

Address: \_\_\_\_\_

I represent: NYC Administration for Children's Services

Address: 150 William Street, NY, NY 10038

Please complete this card and return to the Sergeant-at-Arms