

**The New York City Administration for Children's Services
Gladys Carrión, Esq., Commissioner
Testimony to the New York City Council
Committee on General Welfare
May 8, 2014**

"Oversight – Child Welfare Policy Reforms at the Administration for Children's Services"

Good morning Chair Levin and members of the Committee on General Welfare. I am Gladys Carrión, the Commissioner of the Administration for Children's Services (ACS). With me this morning is Eden Hauslaib, ACS' Acting Deputy Commissioner for the Division of Child Protection. Thank you for the opportunity to discuss our reform efforts to ensure the safety and well-being of the City's most vulnerable children.

Overview of Child Protective Process and Preventive Services

The primary mission of the Administration for Children's Services is to keep New York City's children safe and well. Every year, we investigate approximately 55,000 allegations of abuse and neglect. In about 40% of these cases, our caseworkers find some credible evidence of maltreatment. Whenever possible, ACS provides services to keep families together and prevent children from entering foster care. In the wake of several tragic deaths that have occurred over the past several months, ACS is working with our front line staff as well as our contracted providers to underscore that safety and well-being of the child are the most important factors in the work of child welfare.

In an emergency removal or when a judge determines based on what is presented to the court that children are not safe with their families, ACS takes them into care. In some cases, a judge will place an at-risk child in the home of a relative or parent who was not involved in

allegations of maltreatment. Where no kinship resource is available, the child will be placed into foster care. If a judge determines that the child is not at imminent risk of harm, but some safety concerns persist that can be addressed in the home, the child may be returned to the home, with supervision by ACS. ACS makes referrals to contracted preventive agencies who provide services to address maltreatment concerns, including counseling, parenting classes, substance abuse treatment, domestic violence intervention, home-making, as well as support for pregnant and parenting teenagers. In 2013, ACS provided approximately 22,000 families with an array of preventive services.

ACS Child Welfare Reform Efforts

New York City has been saddened by the reports of tragic deaths of several young children this year, as recently as last week. In order to protect and support New York City's most vulnerable children, we must constantly evaluate our work and ensure that our approach to the sensitive work of child welfare is effective. ACS is in the process of implementing a number of recommendations that Mayor de Blasio, Health and Human Services Deputy Mayor Barrios-Paoli, and I announced earlier this year, including:

1. Bolstering ACS' Approach to the Highest Risk Child Welfare Cases;
2. Reviewing Case Practice of and Communication with our Provider Agencies;
3. Improving Collaboration with other City Agencies; and
4. Creating a Public Awareness Campaign to Reinforce Child Safety and Well-Being

I am also very pleased to announce that, in an effort to strengthen the agency's overall child protective practice, New York City is adding 362 positions to the Administration for Children's Services in the Divisions of Child Protective, Preventive, and Foster Care services. We will have

more information to share on these positions at ACS' budget hearing on the 19th but one position in particular I would like to highlight is an internal monitor who will oversee the implementation of our Child Welfare Reform plan. The person I have hired for this position, Jeanne Milstein, has a long and distinguished career in child welfare - most recently as the Deputy Commissioner of Strategic Planning and Policy Development at the New York State Office of Children and Family Services. Before that, she served as the Child Advocate for the State of Connecticut for 12 years, where she oversaw the delivery of services to children and chaired Connecticut's Child Fatality Review Panel. Jeanne will report directly to me and will be coordinating the improvement of policies and practices across the child welfare system; and revamping our response to child fatalities and critical incidents.

1. Bolstering ACS' Approach to the Highest Risk Child Welfare Cases

ACS is launching a concerted effort to keep front line staff – including Child Protective Specialists (CPS), preventive workers and foster care agency case planners – focused on high risk indicators that can too often lead to tragedy. Since February, we have undertaken an extensive review of our court-ordered supervision cases – those with safety concerns that do not warrant removal but continued supervision by ACS and the family court to monitor safety. In February, we conducted status checks on all 3,586 cases in the City that were under court-ordered supervision at that time – assessing that each child's safety was evaluated and that each child's parent or guardian that was under court-ordered supervision was contacted. Between February and last week, with the assistance of 90 experienced child welfare practitioners, ACS undertook a full case review of 1,600 cases under court-ordered supervision. The full case reviews included a safety assessment, as well as a detailed analysis of case notes to ensure compliance with court orders as well as the child's well-being.

Both the status checks and the in-depth reviews resulted in a list of high risk indicators – which include an overwhelmed young single parent caring for a large sibling group, prolonged absences of a custodial parent, incidents of domestic violence, addiction, and mental health concerns. This list is an important tool for child welfare staff to pinpoint situations where immediate actions and heightened scrutiny are required. Through efforts focused on some of these common indicators, ACS aims to continue achieving a comprehensive awareness of factors in child protective cases that require immediate and on-going attention.

Operationally, ACS is evaluating the structure and resources of our Child Protective Division. In particular, we are assessing the Division's Family Services Unit (FSU), which oversees court ordered supervision cases. ACS is working with Casey Family Programs and Juliana L. Lilien, MS, MSW, a consultant who has worked with ACS in the past on strategic planning, to conduct a thorough review of FSU. The review is examining overall workloads, focusing not only on the number of cases carried by each worker, but also the types of the cases. It also will look at practice issues such as frequency of contacts, conducting purposeful home visits, and ways that Investigative and Clinical Consultants are engaged. We anticipate that the review will identify ways that we can better support staff, enhance practice and accountability, as well as determine what additional resources may be needed for FSU.

While the assessment is ongoing, we have begun to implement two recommendations throughout the city. First, we are enhancing supervision by decreasing the number of units a supervisor manages from four units to three. Second, in an effort to reduce caseloads from 15 to 8 per worker in our FSUs, we will incrementally increasing staffing between now and April 2015.

We are improving case practice within ACS, adding staff and developing better tools for identifying and managing higher risk cases. However, we remain mindful that nothing can substitute for the judgment and dedication of our workforce. ACS Child Protective Specialists truly carry out some of the toughest jobs in the City. As part of our reform efforts, ACS continues to evaluate the resources, training and supervision that we provide to front line staff.

2. Reviewing Case Practice of and Communication with our Provider Agencies

In addition to these internal assessments and actions, ACS is also re-evaluating our communication with and the oversight we provide to our preventive and foster care provider agencies.

In 2007, ACS made the decision to delegate case management responsibilities to our provider agencies. That system-wide reform, called “Improved Outcomes for Children” acknowledged that our foster care and preventive providers had the most direct knowledge about the progress of a family toward reunification, adoption, safely maintaining a child in the home, or any other identified permanency goal. Given their face-to-face and frequent contact with a family, our providers were well-positioned to determine the direction of the case. The goals underlying IOC were to promote a timelier, more informed, and more flexible decision-making process through the use of family team conferencing, that would positively impact the children and families who have come to our attention. And, concurrent with our delegation of authority and responsibility to our provider agencies ACS expanded its role to provide technical assistance, an evaluation process and feedback on best practices that would further strengthen the work of our provider agencies.

In response to the tragedies this winter and spring, ACS undertook an evaluation of the IOC reform. Over the past several months, our consultants, the Leadership Transformation Group,

conducted an in-depth review of the last seven years of IOC. The reviewers, experienced child welfare professionals, collected and analyzed documents and data related to IOC and conducted interviews and convened focus groups within ACS including staff from our preventive and foster care agencies as well as policy makers at the state level. The interviews ranged from executive leadership to front line supervisors, facilitators, quality improvement directors, lawyers, and case planners.

The preliminary findings indicated that the IOC model itself is sound practice but that its implementation needs to be strengthened. One of the many observations made in the report is a long standing tension in the field of child welfare – our work sits at the intersection of law and social work; we are conducting investigations and gathering evidence of maltreatment at the same time that we are providing services and supports to the parent alleged to have maltreated the child. That dual role is complicated – front line staff are not always clear when to wear the “safety hat” and when to wear the “engagement hat.” IOC was designed to bridge this gap; however, the findings in our review suggest that consistent attention to safety monitoring needs to be bolstered.

As a first step, I have been meeting with the executive directors of all our agencies to underscore that safety is paramount and that our providers and ACS must work together to address risk assessment and practice challenges. Once the IOC review has been finalized, I will assess the other recommendations, which include expanding the support, training and technical assistance that we offer to our providers. In the meantime, we continue to review our provider agencies, particularly those involved in any of the recent fatalities. We have also modified guidelines to require that foster care agency court reports be countersigned by the case planner’s supervisor to ensure that any issues detailed within the court report have been discussed and

brought to the attention of agency supervisory staff. Like our FSUs, we are also requiring that our foster care agencies begin reducing caseloads, and we are supporting that effort through a federal waiver.

3. Improving Collaboration with Other City Agencies

Attending to child safety and well-being is not the sole responsibility of any one agency. It is the responsibility of all of our agencies, our communities and individual citizens. The children and families that ACS serves intersect with many city and state agencies including HRA, DHS, the NYPD, DOE, and DYCD to name just a few. Collaboration among these agencies is critical to addressing the needs of vulnerable New Yorkers. To facilitate this collaboration, on April 7, Mayor de Blasio announced the creation of the New York City Children's Cabinet. The Children's Cabinet will promote ongoing, consistent and meaningful communication among city agencies to ensure child safety and promote well-being. The City's Children's Cabinet, which includes over 20 city agencies, met for the first time at the end of April. In collaboration with DOHMH Commissioner Mary Bassett, Deputy Mayor Richard Buery and I outlined a public health approach to child welfare. By definition, public health strategies promote the health and well-being of populations as a whole – e.g., anti-smoking campaigns, bicycle helmets, seatbelts. A public health approach to child welfare will include active engagement in preventing child maltreatment before an incident of abuse or neglect occurs. This includes a wide continuum of prevention activities that extends well beyond providing direct services to individual families and into community supports that engage parents and institutions that provide a strong foundation for well-being. The Deputy Mayor is charging each participating agency to create opportunities for prevention and early intervention to address the needs of vulnerable children and families. I look

forward to updating the General Welfare Committee on the progress of the Cabinet and seeking your input as we move forward.

4. Creating a Public Awareness Campaign Reinforcing Child Safety and Well-Being

Finally, all New Yorkers can play a role in protecting children and promoting their well-being. It truly takes a village – neighbors, family members, elected officials, faith leaders, community-based organizations, and advocates – to raise healthy children. ACS is creating an advertising campaign that will, in addition to encouraging the reporting of suspected abuse and neglect, emphasize the importance of communities utilizing their own resources and organizations to make a difference in the life of a child. We hope to launch this campaign later this year.

Closing

We can and will do better by the vulnerable children and families of this City. The work of protecting children is filled with challenges. I must underscore that child welfare is incredibly hard work. Our own staff and our provider agency staff work long hours under emotionally intense circumstances. Not only is the very subject matter – allegations of child maltreatment – heart-wrenching, but the actual work of simultaneously investigating safety concerns and providing support is complex. By working with you, other city and state agencies, and the many other New Yorkers who care about the nuanced problems that bring families to our attention, ACS can better protect our children and strengthen families. Thank you for your continued support of this important work. I welcome your questions.



**L E G A L
S E R V I C E S**

INCORPORATED

**TESTIMONY
ON
KINSHIP CAREGIVER SERVICES**

BEFORE:

**NEW YORK CITY COUNCIL
COMMITTEE ON GENERAL WELFARE**

PRESENTED BY:

**BARBARA GRAVES-POLLER
SUPERVISING ATTORNEY
MFY LEGAL SERVICES, INC.**

May 8, 2014

**MFY LEGAL SERVICES, INC., 299 Broadway, New York, NY 10007
212-417-3700 www.mfy.org**

Thank you for affording our organization an opportunity to testify today. My name is Barbara Graves-Poller, and I supervise the Kinship Caregiver Law Project at MFY Legal Services. MFY envisions a society in which no one is denied justice because he or she cannot afford an attorney. To make this vision a reality, for 50 years MFY has provided free legal assistance to residents of New York City on a wide range of civil legal issues, prioritizing services to vulnerable and under-served populations, while simultaneously working to end the root causes of inequities through impact litigation, law reform and policy advocacy. We offer advice and representation to more than 8,000 New Yorkers each year. MFY's Kinship Caregiver Law Project represents and counsels New Yorkers who serve as *de facto* parents for non-biological children. MFY is the only civil legal services organization in the city that has a program dedicated to kinship caregiver issues. Children should be raised by their parents. However, if a parent is unable or unwilling to care for a child, MFY works to ensure that the child is placed with a family member and does not end up in the home of a stranger through the foster care system. We advocate on behalf of low-income caregivers who have no right to counsel and do not receive legal assistance from other legal aid programs in the City.

The horrific killing of Myls Dobson has made all of us re-examine our approaches to child safety and family support. Like tens of thousands of children in New York City, Myls did not enter the foster care system when his father was unable to care for him. But tragically, instead of leaving Myls in the care of his extended family, he was placed with a friend. Our experience working with families has shown that relatives often fail to receive the information and support services from the Administration for Children's Services ("ACS") and other agencies when children are in need of emergency care.

Many of Mayor de Blasio's child welfare reform proposals address interagency communications about parents who enter into the criminal justice system. To prevent future tragedies, these initiatives must expand opportunities for families to offer their collective support to vulnerable children and provide greater resources to all kinship families – without raising fears that the family will lose their children to foster care if they seek help. Today, I would like to briefly address the components of the Mayor's child welfare proposal that impact kinship caregivers, non-parents raising children whose biological parents are unable or, in some cases, unwilling to do so.

I. Kinship Caregivers and the Child Welfare System

Tens of thousands of New York City's children live with a non-biological parent. They might be left with a relative with whom they have no legal relationship. Some caregivers may obtain orders of custody or guardianship for children in their care. Other children are cared for by relatives who become approved foster parents, subject to supervision by ACS. Recent reports

suggest that anywhere between 100,000 and 200,000 children in New York City live in kinship care arrangements outside of the foster system.¹ By way of comparison, fewer than 11,700 children were in foster care as of January 2014.²

Research shows that children in kinship care placements experience fewer behavioral problems, mental health concerns, and placement disruptions than children placed with foster parents outside of the family.³ Accordingly, federal law requires state child welfare systems to accord preference to a child's relatives when removing a child from an abusive or neglectful home environment.⁴ Various provisions of the New York Domestic Relations Law, Family Court Act, and Social Services Law also require the ACS and foster care agencies to offer family members the opportunity to care for their relatives before these children are placed in the homes of strangers, but ACS often fails to do so.⁵

II. Inadequate Family Notification Procedures

The Mayor's proposal outlines protocols that ACS should follow when children are subject to the agency's supervision, but it fails to strengthen family involvement in the lives of vulnerable young people. When ACS first comes in contact with a child who must be removed from his or her parents' care, the agency is supposed to "exercise due diligence to identify and provide notice to all adult grandparents and other adult relatives of the child (including any other adult relatives suggested by the parents)."⁶ Under Family Court Act § 1017, the court must direct ACS to undertake an "immediate investigation" to locate any relative of the child, including all grandparents and all "suitable relatives" identified by the parent or child five years of age or older. Likewise, Social Services Law § 409(f) requires caseworkers to record the results of their investigative search for suitable relatives. Yet every week, MFY receives calls from distraught relatives who never received notification that their young family members entered into the foster care system. In other cases, relatives who had

¹ U.S. Children's Bureau, available at <http://www.acf.hhs.gov/programs/cb/resource/fy2003-2012-foster-care-entries-exits>; Stepping Up for Kids: What Government and Communities Should Do to Support Kinship Families, The Annie E. Casey Foundation, available at <http://www.aecf.org/KnowledgeCenter/Publications.aspx?pubguid={642BF3F2-9A85-4C6B-83C8-A30F5D928E4D}>; New York City Administration for Children's Services, available at http://www.nyc.gov/html/acs/html/statistics/statistics_links.shtml; Kinship Care in New York: Keeping Families Together, available at assets.aarp.org/www.aarp.org/_cs/.../aarp_kincarekeepingfamilies6.pdf

² A significant percentage of those children live with family members who became certified kinship foster parents.

³ See Marc Winokur, et al., Kinship Care for the Safety, Permanency, and Well-being of Children Removed from the Home for Maltreatment: A Systematic Review, Campbell Systematic Reviews, 2014:2; *see also* Eun Koh, et al., What explains instability in foster care? Comparison of a matched sample of children with stable and unstable placements, 37 Children and Youth Services Review 36–45 (2014).§

⁴ See Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Pub. L. 104–193, and the Adoption and Safe Families Act of 1997, P.L. 105–89

⁵ See, e.g., Family Court Act §§ 1017, 1027; Soc. Svcs. L. § 409(f); 18 N.Y.C.R.R. § 443.

⁶ See 42 U.C.A. § 671(a)(29)

long-standing relationships with children have told us that their family members were placed directly into the home of a friend identified by the parent, even when that person had only a limited relationship with the parent and child. The following examples are typical of the complaints that we hear.

Ms. L., a grandmother who lives outside of New York City, had been caring for her teenage daughter and granddaughter for years. Ms. L. reached out to her local child welfare agency for preventative services. Instead of offering support, the agency simply commenced an abuse and neglect investigation, threatening to place Ms. L.'s granddaughter in foster care. Not long thereafter, Ms. L.'s daughter traveled to New York City with the grandchild and came to the attention of ACS when she was arrested. Ms. L. contacted ACS to claim her grandchild, but the agency turned her away because the child had been placed with "a friend" whom the mother met during her few months in the City.

Ms. M., a great-aunt who lives in the Wakefield section of the Bronx, had been the kinship foster parent for her great nephew for the first four years of the child's life. The child was then reunified with his mother for a few months before being placed back in foster care in the home of a non-kinship family. Although the foster care agency handling his case confirmed that Ms. M. would take the child back if his return home was unsuccessful, they never reached out to her. Ms. M. lost contact with the child's mother and only learned that he was in foster care after she ran into a family friend on the subway. She repeatedly contacted the foster care agency to have the child returned to her home where she already cares for some of the child's cousins. After the agency ignored her many telephone calls and voicemail messages, its Director of Permanency Planning ordered her to "leave the child alone" since he was "comfortable" with his non-kinship foster family.

These examples reflect the tension between ACS's goal of quickly finding homes for children in need of emergency care, on the one hand, and the rights of grandparents and other extended family members to care for their relatives, on the other. Not every parent in the throes of a crisis can or will identify the full range of relatives able to care for their children. Yet, federal and state laws acknowledge that it is in the best interest of these young people to have family members engaged as caregivers. These laws require independent action by child welfare officials to notify family members. However, ACS practices insufficiently address this issue. MFY reached out to ACS during the previous administration to gather information on how caseworkers comply with their duties to locate suitable relatives for children in care.⁷ At that time, an ACS social worker explained that caseworkers relied exclusively on information supplied by a child's parents during the removal process and that caseworkers did not routinely

⁷ The agency has not yet responded to our March 2014 request for updated information, submitted under the Freedom of Information Law.

follow the investigative procedures to contact other relatives required by law.⁸ As a result, many children end up in the homes of strangers where they are more susceptible to abuse and lose the support of their extended family.

The Mayor's proposal calls for enhanced ACS supervision authority outside of the abuse and neglect investigation context. However, New York's family notification procedures only apply when children are removed from their parents by ACS as part of those investigations, not under other circumstances when children may be in need of care. Even when the notification procedures apply, neither the Social Services Law nor the Family Court Act outlines an enforcement mechanism to ensure that ACS actually complies with these requirements. Without improving family notification procedures, Mayor de Blasio's enhanced interagency communication proposal may do little to help relatives monitor children's safety.

III. Arrests and Caregiver Fitness

All of the caregivers we work with are low-income New Yorkers, 97% of whom are women of color. Given the disproportionate and unnecessary contact that many poor, minority communities have with the New York Police Department, we strongly oppose the proposed expansion of caseworker access to court databases on arrests. This administration has taken important steps to end the era of stop and frisk policing. However, its commitment to pursuing criminal justice equality cannot end there.⁹ Allowing caseworkers to review the arrest records of prospective caregivers and reject prospective caregivers on the basis of those records will not provide the indicators ACS is looking for but will simply perpetuate racial disparities and impose their effects on the next generation.

Not only will basing caregiving decisions on arrest data reverse the administration's progressive criminal justice momentum, it will also prejudice survivors of domestic violence. Abuse victims are frequently arrested along with their abuser under New York's "mandatory arrest" policies.¹⁰ Litigation now pending against the NYPD describes, in harrowing detail, how women subjected to violence have been arrested based on their abusive partner's retaliatory

⁸ This information is consistent with the findings in a recent investigative report in which the head of one foster care agency admitted, "There was a time when we didn't work with families at all ... The general attitude was that we can raise children better than these families can." See Mara Gay, "New York City Is Trying a New Strategy to Find Good Homes for Foster Kids — and It's Working," New York Magazine, Daily Intelligencer, December 18, 2013, available at: <http://nymag.com/daily/intelligencer/2013/12/nycs-new-strategy-for-helping-parentless-kids.html>.

⁹ As the State Attorney General's 2013 report confirmed, racial disparities are not confined to street encounters with police but are evidenced "in the identities of those arrested [and] also in disposition and sentencing." See Eric T. Schneiderman, Office of the New York State Attorney General, "A Report on Arrests Arising from the New York City Police Department's Stop-and-Frisk Practices," Nov. 2013, available at: <http://www.ag.ny.gov/press-release/ag-schneiderman-releases-report-arrests-resulting-stop-and-frisk-practices-and-their>

¹⁰ See N.Y. Crim. Prac. Law § 140.10.

allegations.¹¹ The risk of unjustified arrest is heightened when abuse survivors have limited English proficiency or communicate using sign language. MFY has worked with a number of women whom ACS and foster care agencies rejected as caregivers because those survivors were arrested during incidents of domestic abuse years previously.

We understand the Mayor's desire to protect children from being placed with violent individuals and persons likely to engage in child abuse. Nevertheless, giving caseworkers broad access to arrest records will not solve this problem. It will exacerbate existing inequalities.

IV. Improved Support Instead of Increased Supervision

We applaud the Mayor's call for a thorough review of the ACS Family Support Unit ("FSU"). However, we feel troubled by the overarching goal of increasing ACS communication with law enforcement which will deter people like our clients from seeking preventative services instead of expanding support for families in need of help.

The FSU's stated purpose is to "strengthen and stabilize families, prevent the need for out of home care, expedite permanency and prevent the replacement of children into foster care."¹² However, not one of our clients has ever reported that she either knew about or sought services from this division of ACS. Indeed, our clients tell us that they fear being "reported" to ACS or losing custody of their children if they reach out for help. Ms. P., for example, is a grandmother caring for two grandchildren who have been in her care for years. Both children had been subjected to horrendous sexual abuse before moving in with her; one of them recently began to display troubling behavior at school. Yet, Ms. P. is terrified of accessing mental health services for the boy because she believes that doing so would subject her to a child protective investigation by ACS and possible removal of the children. Research has shown that low-income persons are more likely to be accused of child abuse by medical professionals than more affluent families who present similar medical concerns; and anecdotal evidence reveals that Ms. P.'s fears of an ACS investigation and possibly removal are well-founded. Forging a closer relationship between the FSU and law enforcement will only deepen the already substantial fear that families in crisis have of seeking support services.

¹¹ See Yanahit Padilla Iorres, *et al.*, v. City of N.Y., Index. No. 13-CV-0076 (E.D.N.Y.) (MKB) (RER). On November 22, 2013, the U.S. Attorney for the Eastern District of New York filed a statement of interest, urging the court to deny the City's motion to dismiss the action, based on the facts of national origin discrimination alleged by the LEP domestic violence survivors who are the plaintiffs in that action.

¹² See <http://www.nyc.gov/html/acs/html/about/divisions.shtml>

V. Recommendations

MFY lauds the Mayor's swift action and attention to the need for comprehensive child welfare reform. Nevertheless, we are concerned that the enhanced law enforcement and supervision called for in the administration's proposals will do little to strengthen the existing resources within families to protect children. To improve this plan of action, we offer the following recommendations:

A. Enhance Family Notification Procedures and Policy Enforcement

At present, ACS's procedures for notifying family members of a child's removal from his or her parents suffer from insufficient compliance and inadequate enforcement. The Mayor's proposal to expand ACS communications with the Departments of Parole and Probation will do little to improve a family's ability to protect its own children unless the proposal addresses the need for more thorough notification procedures. Caseworkers who come in contact with children needing supervision must be required to conduct an investigation into all of the child's relatives who may serve as caregiving resources. Using language that protects a parent's privacy with respect to the circumstances underlying the need for supervision, the agency should notify such relatives that the child is about to receive services from ACS and invite the family members to contact the agency for additional information.

B. Maintain Existing Limits on Arrest Information

Families who come in contact with the child welfare system already suffer from criminal justice inequalities. Expanding caseworker access to arrest records will compound the effects of existing discrimination within law enforcement and unnecessarily deprive children of an opportunity to be cared for by their relatives. It will also have a chilling effect on the willingness of relatives to come forward as prospective caregivers.

C. Improve the Family Support Unit's Communication with Families

Family members do not know how to secure support services and have reasonable fears of being subjected to ACS investigations if they seek help. Right now, the agency discusses its "preventative services" in the context of abuse and neglect investigations, and its support resources are described in terms of preventing "child abuse." Most caregivers who need help are not potential abusers and do not know that the FSU and affiliated organizations offer a variety of community-based support services that may be useful outside of the abuse context. ACS should redefine its Family Support Unit to clarify the range of supports available to families that are not involved in an abuse or neglect investigation. It should also establish a dedicated hotline for

caregivers to obtain information and resources for relatives that is separate from its child abuse hotline.

D. Address Rights of Relatives in Public Awareness Campaign

Any public awareness campaign regarding child safety must address the rights of and resources available to families. Many relatives do not know about the preventative services available through community based organizations affiliated with the FSU. They are also unaware of their right to challenge ACS child placement decisions in Family Court. To better serve these children and their families, the Mayor's public awareness initiative should include information about these issues in its messaging.

Once again, thank you for allowing us to speak about these important issues today. MFY is available to provide additional information on caregiver legal concerns. We are also happy to assist caregivers in your respective communities.



Testimony of

Stephanie Gendell
Associate Executive Director
Citizens' Committee for Children

Before the
New York City Council
General Welfare Committee

May 8, 2014
*Oversight: Child Welfare Reforms at
the Administration for Children's Services*

Good morning. My name is Stephanie Gendell and I am the Associate Executive Director for Policy and Government Relations at Citizens' Committee for Children of New York, Inc. (CCC). CCC is a 70-year old independent child advocacy organization dedicated to ensuring that every child in New York City is healthy, housed, educated and safe.

I would like to thank Council Member Levin and all of the members of the General Welfare Committee for holding today's hearing on child welfare. There is probably no role of government more sacred than its mandate to keep children safe. We appreciate the City Council's interest in this issue and the ongoing efforts of the many dedicated and hard-working staff at the Administration for Children's Services (ACS).

ACS investigates approximately 55,000 allegations of child abuse and neglect each year, and indicates approximately 40% of these cases as those where they have reasonable cause to believe abuse or neglect occurred. Approximately 5,000 children will enter foster care each year and approximately 10,000 new families will begin receiving preventive services each year. The number of children in foster care has decreased dramatically over time and as of February 2014 we are at an all-time low of 11,659 children in foster care.

Since the creation of ACS in 1996, we have seen significant reforms and much progress, but there is still much work to be done. CCC is pleased that the Mayor is personally dedicated to ensuring the safety of the City's children and we are also pleased with his choice of Commissioner Carrion to lead the next decade of child welfare reform here in NYC. We look forward to working with the Commissioner and the Administration to ensure the budgets, policies and practices at ACS keep the City's children safe and do a better job of ensuring permanency and well-being.

It goes without saying that child welfare is hard. The system is like a tri-pod, comprised of three main components-- protective, preventive and foster care—and all three must be strong and stable for the system to properly function. ACS and its provider agencies are responsible for the safety, permanency and well-being of the children with whom they come into contact.

This means that ACS and its child protective staff are often faced with the impossible task of deciphering which families will be safe, perhaps if they receive some support, and which are families where they need to intervene to prevent a tragedy. Inaccurate decisions in either direction hurt children who might suffer more abuse or be needlessly separated from their families. At the same time, ACS must ensure that the care given to foster children meets all of their needs, that the children and their families receive the services they need, and that children remain in foster care for the shortest amount of time possible.

As Commissioner Carrion often explains, all of this work—preventive, protective and foster care—must be centered around child well-being. Children only get to be children once. They need the love, support and stability of a family so that they can thrive. In

addition, they need a solid education (including educational continuity), housing stability, health and mental health care, and access to the social and developmental opportunities we want all children to have. Often times the needs of children touched by the child welfare system are greater than those of other children because of the trauma they have faced—in their homes and in some instances due to the separation from their families.

As we know all too well, in the midst of trying to ensure a high quality child welfare system, there are tragedies. We remember many of their names—Lisa Steinberg, Elisa Izquierdo, Nixmary Brown, Myls Dobson and most recently Juan Sanchez. While all of these tragedies can offer us lessons, it is important not to base policy decisions and changes on fatalities alone, as they are not representative of an entire system.

That said, we are extremely pleased that Mayor de Blasio and Commissioner Carrion have committed to reviewing ACS's policies, procedures and initiatives as a result of the recent tragedies. CCC's testimony offers some of our thoughts based on these cases and the steps the City has taken since then and then includes the recommendations we submitted to the new administration.

CCC was pleased that the Myls Dobson tragedy has led to a review of Court Ordered Supervision cases. We are pleased that ACS is reviewing all of these cases and look forward to seeing the outcome of their analysis.

CCC has long had concerns about these cases because we believe they have the highest level of risk, but the least amount of services.¹ In these cases, ACS has grounds to file a case in court and the Judge orders the family to participate in services and orders ACS to supervise the home and provide services. Thus the children are in their homes, but unlike other preventive service cases, the services are not optional and there is often no preventive service program—instead the ACS child protective worker makes referrals. In instances where there is a referral to a preventive program, CCC's 2010 analysis found there was role confusion between the child protective worker and the preventive service program. At the time of our report, we recommended that ACS convene a workgroup to address the policies and procedures for court ordered supervision case and we once again make this suggestion. CCC hopes that we can be helpful to ACS in any way as they conclude their review and work on reforms.

Another issue CCC raised in our 2010 report on preventive services was ACS's implementation of a 12 month average length of service for preventive service cases. If preventive service programs do not open 25% of their total caseload each quarter, they lose funding. At the time, we were concerned that this rule will lead to caseworkers closing their cases at 12 months. CCC continues to believe that the decision to close a preventive service case must be based on the alleviation of the risk factors that led the family to be receiving preventive services and not a specific length of time. We respectfully suggest that ACS work with its providers on guidance and/or a risk assessment tool to help make decisions about closing cases.

¹ See Citizens' Committee for Children, *The Wisest Investment: New York City's Preventive Service System*. 2010.

We are pleased that as part of the response to the Myls Dobson case, the Mayor and Deputy Mayor Buery have created the Children's Cabinet, a multi-agency group of Commissioners focused on the needs of the City's children. As almost all fatalities (as well as case reviews in general) reveal, inter-agency communication and collaboration is critical to the safety and well-being of children.

The most recent tragedy of Juan Sanchez once again raises issues about the conditions in the City's family shelters. As CCC recently testified to at DHS oversight hearings, with over 22,000 children living in homeless shelters—both Tier 2 and cluster sites—it is imperative that DHS review the conditions of all of these facilities to ensure that they are safe places for children.

It is also important to note that while foster care is at an all-time low, family homelessness is at an all-time high. When child welfare cases are reviewed, we often see tremendous housing instability. The unintended consequence of families being unable to secure permanent housing and spending an average of 489 days in shelter, is that they essentially have housing stability. Thus, as we work to address homelessness, it is critical that we ensure families have the additional support and services that they will need as they move to permanent housing (all moves are stressful even if to a better home).

In addition, as we think about the child welfare system, CCC believes we must also think about communities, as families are components of communities. Currently most of the child welfare services NYC provides are AFTER there has been a report alleging that a child has been abused or neglected. The best case scenario, however, is for us to prevent child abuse or neglect in the first place. We believe that this will require the strategic use of resources, which may not be funded by the typical state funding stream, to provide preventive services in the places they are needed most. The City can map all sorts of risks to child well-being and determine which homeless shelters, housing complexes, schools, etc. have high rates of abuse/neglect and target preventive services (like parenting classes, mentoring programs, drug treatment, etc.) to those sites.

As CCC thought through recommendations for this new administration, we decided to both survey child welfare stakeholders and pull together a group of stakeholders to develop recommendations. Ultimately, these recommendations were signed off on by 18 organizations and social work professor and CCC submitted them to the new administration and the Chair of this committee.

As these recommendations focus on the child welfare system, we respectfully submit them as part of this testimony. As you will see, they center on the following themes:

- Recognize and elevate the Administration for Children's Services (ACS) as the City's emergency responder for children in allocating resources (and if necessary during PEG programs).
- Maintain the City and ACS's commitment to preventive services.
- Continue efforts to decrease children's lengths of stay in foster care.

- Enhance the City's focus (primarily ACS and DOE) on educational outcomes and educational continuity for children and youth in foster care and receiving preventive services. Hold both ACS and DOE accountable for educational outcomes for foster children and youth.
- Strengthen cross-system coordination for the child welfare system, including on issues related to housing, education, older youth in foster care, youth aging out of foster care, children with developmental disabilities, mental illness, etc.
- Enhance the use of data to better target where services and which types of services (for both preventive and foster care) are available.
- Maintain and/or expand policies, initiatives and programs that have been successful during the prior administration including: Manageable (and low) child protective caseloads; ChildStat; Family Team Conferences; Parent advocates (at ACS conferences and in preventive and foster care programs); delegation of case management to contract agencies; and implementing the LGBTQ policy, mental health principles and visiting principles.
- Maintain and/or expand new initiatives and evaluate their outcomes to ensure effectiveness including: Evidence-based programs in preventive and foster care; ChildSuccess NYC; and Child Safety conferences.

The full document is attached. Thank you for the opportunity to testify.

Recommendations for the Next Decade of Child Welfare in New York City

Executive Summary

New York City's Child Welfare system has undergone significant reforms, and achieved much progress and success since the creation of the Administration for Children's Services (ACS) as a stand-alone agency in 1996. There is much that the next Administration can do to build upon this progress, by maintaining much of what is in place and implementing some systemic changes. This document outlines the key components of the current system that a diverse group of child welfare stakeholders believe should be maintained, strengthened and developed to ensure the safety, permanency and well-being of New York City's children and their families.

New York City's child welfare system now regularly employs family team conferences, is expanding its uses of evidence-based practices, has reduced child protective caseloads and preventive caseloads, has expanded permanency options to include subsidized kinship guardianship, has significantly reduced the system's reliance on residential care (congregate care), and is in the process of implementing a new federal Title IV-E waiver, aimed at improving the foster care system by reducing length of stay and better addressing child well-being. Most notably, in 1996 there were just over 40,000 children in foster care; today, foster care placements are at an all-time low with just under 12,000 children in foster care. In addition to the foster care census being at an all-time low, the preventive service system continues to serve more children and families.

At the same time, much remains to be done to improve the system: foster children need more educational stability; foster care caseloads are too high; preventive service utilization rates need to increase; time to permanency is still much too long; there are very limited post-permanency services available; and too many young people age out of the system without a family or stable living situation.

This document includes a series of recommendations about programs, policies and initiatives that we are suggesting should be maintained, strengthened, expanded, changed, and/or developed. The recommendations are organized by program area (protective, preventive, foster care, and older youth), and includes sections on system structure, the system over-all, and work we encourage the administration to take with the state and federal levels of government.

The recommendations in all areas center on the following themes:

- Recognize and elevate the Administration for Children's Services (ACS) as the City's emergency responder for children in allocating resources (and if necessary during PEG programs).
- Maintain the City and ACS's commitment to preventive services.
- Continue efforts to decrease children's lengths of stay in foster care.
- Enhance the City's focus (primarily ACS and DOE) on educational outcomes and educational continuity for children and youth in foster care and receiving preventive services. Hold both ACS and DOE accountable for educational outcomes for foster children and youth.

- Strengthen cross-system coordination for the child welfare system, including on issues related to housing, education, older youth in foster care, youth aging out of foster care, children with developmental disabilities, mental illness, etc.
- Enhance the use of data to better target where services and which types of services (for both preventive and foster care) are available.
- Maintain and/or expand policies, initiatives and programs that have been successful during the prior administration including: Manageable (and low) child protective caseloads; ChildStat; Family Team Conferences; Parent advocates (at ACS conferences and in preventive and foster care programs); delegation of case management to contract agencies; and implementing the LGBTQ policy, mental health principles and visiting principles.
- Maintain and/or expand new initiatives and evaluate their outcomes to ensure effectiveness including: Evidence-based programs in preventive and foster care; ChildSuccess NYC; and Child Safety conferences

Recommendations for the Next Decade of Child Welfare in New York City

New York City's Child Welfare system has undergone significant reforms, and achieved much progress and success since the creation of the Administration for Children's Services (ACS) as a stand-alone agency in 1996. There is much that the next Administration can do to build upon this progress, by maintaining much of what is in place and implementing some systemic changes. These recommendations, developed by a diverse group of child welfare stakeholders, outline the programs, policies and initiatives that we believe should be maintained, expanded and/or created to continue enhancing the progress the Administration for Children's Services (ACS) has made to keep New York City's children safe, while strengthening and supporting families.

Child Welfare System Structure

- Maintain the **Administration for Children's Services (ACS)** as its own agency reporting to the **Deputy Mayor for Health and Human Services**.
- Maintain and strengthen the position of **Family Service Coordinator**, to ensure there is better coordination of services and supports among agencies that impact families and children.
- Create an **inter-agency task-force** with teeth to address issues such as: the needs of older youth and youth aging out of foster care; educational issues for foster children; preventing fatalities; and interfacing with Family Court.

Child Welfare System Over-all

- Recognize **ACS as the emergency responder for children** so that any necessary budget cuts/PEG targets be implemented in a manner that best protects the needs of children. Thus, like the Police, Fire, Sanitation, Corrections Departments and Department of Education, ACS should be given lower PEG targets than other City agencies.

- Infuse **parent voice** and **youth/child voice** throughout the system (protective, preventive and foster care) in decision-making, planning and implementing system reforms. Fund parent advocates for preventive and foster care programs. When developmentally appropriate, engage children and youth as partners in the case planning process.
- Use available **data to inform decision-making** about child welfare programming; matching community needs to services; and assessing and addressing program successes/challenges.
- Ensure **information about what services are available through ACS and its providers is widely available** so that families know where they can go for services and service providers know where to refer families.
- **Evaluate and maintain evidence-based and evidence-informed** child welfare programs and **expand** programs found to be effective (in preventive, PINS, foster care and juvenile justice). Continue to encourage the development and testing of **promising practices** that have also been shown to be effective, even if not yet evidence-based.
- Work **collaboratively with the child welfare community** to assess system's needs, challenges, and successes. Maintain the Commissioner's Advisory Panel. Engage child welfare community in reform efforts and development of new initiatives.
- Ensure child welfare **data** on performance outcomes is **publicly available**.
- Continue the use of **Family Team Conferences**.
- Assess the **racial disparities** in the child welfare system, which get more profound in each level of the system, and take steps that address the reasons for the disparities.
- Ensure the needs of Lesbian, Gay, Bisexual, Transgender, and Questioning (**LGBTQ**) youth, parents and foster parents remain a key focus of ACS and the new administration.
- Ensure families involved with the child welfare system have access to **early childhood education**.
- Families involved in the child welfare system are often-times families struggling with **poverty, unemployment, housing insecurity, and food insecurity**. The future of child welfare, preventive services and NYC's goals of addressing poverty need to focus on ensuring ACS's families have access to the interventions that will stabilize their lives including education, vocational training, employment, and housing assistance.

Mayoral Support at the State and Federal Level

The Mayor can play a big role in helping to advance much-needed changes, reforms and resources at the state and federal level.

- Use the Mayor's role as **bully pulpit** to advocate for **Family Court Judges** and Family Court resources.

- Ensure the Mayor's Office is **vocal on state and federal child welfare issues**, including State **Medicaid Redesign** (the move to Medicaid Managed Care) and **federal child welfare financing** reform. Support and advocate for the recommendations in *Raising the Bar for Health and Mental Health Services for Children in Foster Care*, which were developed through a workgroup process spear-headed by COFCCA and CCC.
- Work with the Governor to develop a **City/State child welfare task force** to address inter-agency barriers. The Task Force should include all of the agencies interfacing with the child welfare system (such as the Department of Corrections, OMH, OCFS, OTDA, OPWDD, State Education/DOE, etc.)

Preventive Service System

Maintain a commitment to preventive services so that more children can remain safely in their homes with their families.

- **Ensure all families in need of preventive services are accessing preventive services.**
While the number of abuse/neglect reports and the indication rate have remained relatively constant, (meaning the number of cases ACS has substantiated abuse or neglect has remained constant), the number of families receiving ACS services (foster care or preventive) has decreased. On the other hand, the number of children in homeless shelters has substantially increased and is at an all-time high of over 22,000.
- **Use data to be more targeted/proactive about where to put preventive services.**
Specifically, the new administration should:
 - Look at whether there are certain buildings, homeless shelters, schools, etc. with high rates of child abuse/neglect reports and target the services to those families proactively before there is the need for a child abuse report.
 - Look at which communities have certain models of preventive services (including evidence-based models) and complete a needs-assessment with regard to what communities are in need of certain models. (General preventive slots were converted to evidence-based models based on the discretion of agencies rather than the needs of communities. There now needs to be a process to match needs to services in communities by looking at data such as program types available, abuse/neglect reports, foster care entry, homelessness, etc.)
 - Develop preventive services specifically targeted to families in homeless shelters, in a manner that ensures that families do not need to enter the homeless shelter system to access services.
- **Separate family support needs** from preventive services and ensure families in need are able to obtain family support services outside the child welfare preventive service system.
- **Assess the implementation issues within the new RFP**, including the 12-month average length of service incentive structure and the rate for providers, and make needed adjustments to ensure preventive cases are not closed before risk has been sufficiently addressed. Assess the **process** agencies use to determine when/whether to **close**

preventive service cases, aside from length of service. Consider implementing a risk-assessment protocol that takes into account risk factors such as the birth of a new child, introduction of a new adult to the family, relapse, etc. Ensure that an ACS investigation is not the only gateway for families to access preventive services.

- **Fund trial discharge and after-care** for children leaving foster care through the preventive service funding stream.
- **Reassess the financial penalty to programs (10% of rate) for not enrolling 25% of their total capacity every quarter.** Currently, ACS is not making enough referrals for many programs to be able to meet this requirement and thus the programs are being financially penalized. This rule was implemented at a time when the system was operating at 100% utilization, but now that there is available capacity, this financial structure is not needed to ensure families have access and is negatively impacting the ability of programs to provide high quality services.

Child Protective System

Ensure the child protective system has the resources and training needed to keep New York City's children safe and reduce repeat maltreatment.

- **Maintain low and manageable caseloads for child protective workers and supervisors.**
- **Take efforts to make removals (particularly emergency removals) less traumatic for children.** This could be informed by a study on the impact removals and whether removals are conducted in a trauma informed manner.
- **Evaluate the Family Assessment Response (FAR) pilot in Queens, and expand it citywide** if it is effective at keeping children safe and providing needed services to families. FAR is New York State's differential response model, which allows child protective agencies to put some cases on an alternative track that focuses on strengths-based service provision and does not culminate in a child abuse or neglect determination.
- **Enhance opportunities for protective services to collaborate with preventive agencies and foster care agencies,** including joint home visits and times of case closing/opening.

Foster Care/Permanency

Additional measures needed to be taken to reduce the length of time New York City children spend in foster care. New York is currently ranked 50th out of 52 ranked states (plus DC and Puerto Rico) in the federal review of time to permanency.

- **Continue implementation of Child Success NYC** (the federal Title IV-E waiver) system-wide and assess its effectiveness. The assessment should include a survey of a wide range of stakeholders including parents, parents' attorneys, youth and children's attorneys.
- **Look at the initial foster care placement process** and make modifications as necessary to ensure children are placed in families/settings that best meet their needs for safety, permanency and well-being. Items to consider include whether siblings are able to be

placed together; how to have more aggressive family-finding at intake; whether non-family foster placements are good matches for children; whether children are placed near their schools; whether placement by Community District is the correct location measure to use, etc.

- Create an **Education Stability Task Force** of stakeholders inside and outside of government, including ACS, DOE, foster care agencies, attorneys for children, foster parents, and advocates to create a plan whereby more foster children would be able to stay in their school of origin when they enter foster care and remain in their school when their foster care placement changes.
- Ensure provider agencies are **funded** to not only provide for safety and permanency, but for **child well-being** as well. This includes ensuring access to health/mental health services, educational/vocational services, tutoring, and also normative childhood activities and items such as school trips, prom dresses, art, music, dance and sports activities, driver's education/licenses, etc.
- Focus more on **permanency for youth** so that youth in foster care leave the system to families and do not age out of foster care.
- Fund **trial discharge** to help maintain the stability of reunifications. Currently, these children are in the legal custody of the Commissioner while in the physical custody of their parents and foster care agencies are responsible for providing services and supervising the families, but the foster care agencies are not paid for these families—this needs to change.
- Decrease barriers and lengths of stay for children with a **goal of adoption**. Focus more attention on child-centered recruitment.
- Increase **funding for post-permanency services**, including post-reunification, post-adoption, and post Kin-GAP (subsidized guardianship).
- Focus more on **foster parents**, including recruitment, retention and training.
- Renew the focus on the **Family to Family model**, where there is a team approach to providing foster care and efforts are made to create a relationship between the birth parents and foster parents.
- Increase services and funding for **high-needs foster children**, including developmentally disabled children, autistic children, and children with severe mental health needs. Provide reasonable rate increases for therapeutic foster boarding homes and residential care. Enhance collaboration with State agencies that also serve these children including OMH and OPWDD.
- Reinstitute **discharge grants** for parents reunifying with their children and youth aging out of foster care.
- Use **data** to align residential care capacity and foster home capacity with needs.

- Develop **electronic health records** for children in foster care. Ensure that foster care provider agencies have adequate supports, including IT and billing, to transition successfully into Medicaid managed care.

Child Welfare and Adolescents/Youth

Make a new and renewed commitment of the child welfare system to young people. Pay particular attention to the needs of youth.

- **Delink youth development services for foster children 16 and older from being in foster care** to eliminate the disincentives that exist for youth to leave foster care (e.g. any educational, housing, employment or other financial incentive). Provide these critical services to all youth 16 and over who have been in foster care.
- **Make permanency, youth development and housing needs** for foster youth must be front and center for the work of ACS. Focus on additional issues including education, vocational training; employment assistance; and the needs of pregnant and parenting youth.
- Consider bringing **successful models** (such as FEGS and the Children's Aid Society Next Generation Center) to all boroughs and fund them.
- Create additional programs, services and supports for **commercially sexually exploited youth** (girls and boys).

Child Welfare and the Family Court System

The collaboration and partnership between the Mayor's Office, ACS and the Family Court system is critical to ensuring the systems are coordinating well and to decrease foster care lengths of stay.

- Use the influence of the Mayor's office to join the Coalition advocating for **additional Family Court Judges** and Family Court resources.
- Support the Judiciary's budget request to keep **courtrooms open until 5:00 PM**, especially in cases where ACS is seeking foster care placements.
- Collaborate with the Family Court system on ways to **decrease court delay** and expedite permanency for foster children.
- Continue and expand the ability for foster care agency caseworkers to **tele-conference into court** when they are not due to be testifying.
- Ensure foster care agency **court reports** are submitted to parties **timely**.
- Adequately fund **institutional representation for parents** in child welfare cases.
- Ensure **vacancies to the Family Court bench** are filled timely.

- Ensure that **protocols for emergency removals** are followed and that hearings are held prior to removal whenever possible.

Conclusion:

The child welfare system is poised to continue to make tremendous progress under the leadership of Mayor de Blasio, Deputy Mayor Barrios-Paoli and ACS Commissioner Gladys Carrion. Many of the child welfare stakeholders have had a long history of working with you on these issues. We look forward to working together to create an even stronger child welfare system that ensures the safety, permanency and well-being of New York City's children.

Recommendations for the Next Decade of Child Welfare in New York City

Prepared by Citizens' Committee for Children, with the generous support of the Redlich Horwitz Foundation, on behalf of the following organizations:

Bronx Defenders, Family Defense Project
Brooklyn Defender Services, Family Defense Project
Center for Family Representation
Center for Family Life, a program of SCO Family of Services
Child Welfare Organizing Project
The Children's Aid Society
The Children's Village
Citizens' Committee for Children
Council of Family and Child Caring Agencies
Federation of Protestant Welfare Agencies
Good Shepherd Services
Graham Windham
Lawyers for Children
Leake and Watts
New York Council on Adoptable Children
The New York Foundling
Trudy Festinger, Professor, New York University School of Social Work
SCO Family of Services
You Gotta Believe!

**Social Service
Employees Union
Local 371**



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CITY COUNCIL TESTIMONY
May 8, 2014

Thank you Chairperson Levin for convening this hearing on ACS.

I am Anthony Wells President of the Social Services Employees Union Local 371 (SSEU Local 371). We represent over 4,899 workers in ACS .

Our members are engaged in one of the most difficult and critical jobs in the city: protecting children. However, they tackle their responsibilities with care, concern and commitment everyday. In the area of Child Protective Services , they often work under the most adverse conditions. There are high caseloads, repetitive and redundant paperwork, inconsistent policies, hostile work environments, to name a few. They go into homes, not knowing what is on the other side of the door, often in dangerous and unstable environments.

The recent deaths of children has once again brought ACS into the public light. When there is the unfortunate and terrible death of a child and the family is known to ACS, the first thought is: What did the workers do wrong? This has been the history of BCW, CWA and ACS. When something goes wrong, the workers are the first, and sometimes, the only source of blame. Too often the workers are scapegoated because the public and yes sadly, public officials do not understand the nature of the job or what ACS workers do. This is not making excuses but rather trying to get to an understanding of what ACS is, what the workers do and how the public can be more involved in the saving of children's lives.

Well, it is time to stop scapegoating and blaming workers and improve the system. The present Administration is seeking to change the trend. Thus far it has not gone after workers to blame but instead to look for real solutions to the problems. We commend this new Administration for the creation of the Children's Cabinet, which brings other agencies into the discussion of protecting children and their families. It also is a way to hold other agencies accountable when they are involved with the families. We also commend their efforts to review the Family Support Unit, the Improved Outcomes for Children program and additional hiring.

Morale is at an all time low. Workers are overburdened with caseloads as high as 15 cases. They are required to complete templates on each child that often require answers to an exhaustive list of questions. And there are mid-level managers who are more concerned with deadlines and statistics than protecting children and supporting workers.

We look forward to working with Commissioner Carrion to implement changes that ensure that services are provided to families and workers are able to do their jobs. We have suggested the creation of Screening Units that would be able to assess cases that may be valid or need many services. The screening unit workers would take more cases, help reduce caseloads and make determinations as to whether further services are needed. The screening unit would provide immediate relief to high caseloads.

We have recommended that every Protective Unit have a Child Protective Specialist Supervisor I. The CPSS would not carry a caseload but would provide assistance to the unit supervisor and unit workers. That person would be able to provide supervision and assistance that would alleviate work on the CPS. CPSS workers were the casualties of budget cuts in the Mattingly Administration.

We have recommended that workers go to the field in pairs as a matter of policy. This would increase the safety factor for workers and also provide another pair of eyes, ears and thoughts for the assessment process.

Changes in ACS do not come quickly but these recommendations and the Administration's plans can have immediate impact and start the process. ACS has suffered privatization in areas such as foster care, group homes, preventive care and oversight. There was an over-investment and reliance on the Improved Outcomes for Children that resulted in the layoff of hundreds of ACS workers in 2008 and 2010.

Finally, there needs to be more mental health services and the creation of social work units in the field offices. Mental health is a common thread in many ACS cases whether it is drug abuse, alcoholism and/or domestic violence. By creating social work units, staffed by licensed social workers, of which ACS has plenty, those hard to engage families, resistive families and families with a long history of ACS involvement can receive the services they need.

This Administration appears to be on the right track. It wants to include all parties of interest, including the unions in the discussion to improve child welfare services. It must support the workers through hiring, training and creating a work environment conducive to resolution not retribution.

And the City Council must be prepared to provide support as well..

FOR THE RECORD

**TESTIMONY OF
LAWYERS FOR CHILDREN
AND
THE LEGAL AID SOCIETY**

The Council of the City of New York
Committee on General Welfare
Stephen T. Levin, Chair

Oversight: Child Welfare Policy Reforms at the Administration for Children's Services
May 8, 2014
New York, New York

Submitted by:

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Lawyers For Children and the Legal Aid Society submit this testimony and thank the Committee on General Welfare for providing us with an opportunity to share our feedback regarding the reforms called for in the wake of Myls Dobson's death. Myls' death was a tragedy that shook all involved in the city's child welfare system. It is certainly appropriate to examine whether there are policies or practices that can be implemented to ensure that the City does the best job possible of protecting vulnerable children, while at the same time respecting the rights of children and parents to be free from unnecessary government interference.

Lawyers For Children is a not-for-profit legal corporation dedicated to protecting the rights of individual children in foster care and compelling system-wide child welfare reform in New York City. For 30 years, LFC has provided free legal and social work services to children in cases involving foster care, abuse, neglect, termination of parental rights, adoption, guardianship, custody and visitation. Currently, we represent children and youth in more than 6,000 judicial proceedings in New York City's Family Courts each year. Our response to the reforms proposed by Mayor De Blasio is informed by our extensive practice and the unique experiences of our clients.

The Legal Aid Society is the nation's largest and oldest provider of legal services to low income families and individuals. The Society operates three major legal practices – Civil, Criminal and Juvenile Rights – providing comprehensive legal services throughout New York City. Legal Aid's Juvenile Rights Practice provides legal representation to children who appear before the New York City Family Courts in all five boroughs, in abuse, neglect, juvenile delinquency, and other proceedings affecting children's rights and welfare. Last year, our staff represented some 34,000 children. Our perspective comes from our daily contacts with children and their families, and also from our frequent interactions with the courts, social service providers, and State and City agencies whose practices impact our clients and their families. In addition to representing many thousands of children each year in trial and appellate courts, The Legal Aid Society also pursues impact litigation and other law reform initiatives on behalf of our clients.

We are constrained from providing extensive comment on all of the Mayor's proposed reforms in large part because it has been only a very short time since those reforms were proposed. More time is needed for the proposals to be fully implemented and for their effects to be seen in any significant measure. Consequently, we urge the City Council to revisit these issues in several months to get a better understanding of the ways in which the proposed reforms are being carried out and the ways in which they are affecting the families and children served by the NYC Administration for Children's Services (ACS).

In the interim, as the Mayor and ACS Commissioner Carrión move forward to implement the plan to improve ACS practice and raise awareness of child safety, the following points regarding their plan should be taken into consideration:

The Mayor's call for clear expectations to be laid out for the Family Support Unit must include expectations regarding contact with the person who has been designated by the court as the child's caretaker. A particularly glaring failure in the Myls Dobson case, and one that should be the focus of any reform, is the failure of the ACS workers to speak with Myls' father during five months of the year that Myls lived in his home under ACS supervision. Although the Family

Court placed Myls with his father under ACS supervision, and ACS made nine visits to the home during that time, for five months the caseworker neither saw nor spoke to Myls' father. Good social work practice and common sense both dictate that a worker supervising a young child's placement must speak with the adult who is charged with the care of the child in order to determine whether the adult is properly attuned to the child's needs, is capable of meeting those needs, and is, in fact, providing a safe, stable home for the child. A worker who insisted on meeting with or speaking to Myls' father would have learned that he was incarcerated, which could have raised red flags. In the wake of this tragedy, every caseworker who is supervising a child must have regular, meaningful contact with the adult who is responsible for the child's care.

The Mayor's call for an interagency agreement between the NYC Department of Corrections and ACS directing correction officers to ask incoming inmates who are primary caregivers about what arrangements they have made for their children is not sufficient. Simply asking what arrangements have been made will neither ensure that children are safe nor prevent unnecessary interventions into the family by child welfare officials – further traumatizing children who are already coping with their parent's arrest. The interagency agreement should include provisions that will assist incarcerated parents in ensuring the safety of their children. The agreement should provide parents with access to whatever telephone privileges are necessary to ensure that appropriate arrangements are made for the children, should include referrals to community resources that might provide additional supports to the family, and should include the provision of information regarding the possibility of placing the children in temporary voluntary foster care, when the parent has no appropriate resources. It is important, however, to allow caregivers the ability to have an appropriate family member care for a child while the criminal process proceeds, and the City should work towards that end. Unnecessary non-familial foster care placement can be detrimental for a child whose relatives are willing and able to provide such care.

The Mayor's plan to establish interagency collaborations with the New York State Department of Parole and New York City Department of Probation must include more than simply notifying the Department if a caretaker on parole or probation is under the supervision of the Family Court. Often, the parole or probation officer for a parent has crucial information regarding a parents' ability to safely care for a child in the home. There should be a clear understanding by parole and probation officers as to what their obligations are under the mandatory reporting law. Additionally, there should be clear direction and training as to when parental behavior rises to the level of a call to the State Central Registry.

Nearly all of the reforms called for by Mayor de Blasio involve increasing scrutiny and monitoring of families under ACS supervision. Such increased scrutiny is particularly important for young children who are unable to protect themselves, and are completely dependent upon their caregivers. This is especially true for children who are not yet school-aged, who are not seen regularly by members of the community and do not have consistent contact with service providers who might identify problems or signs of mistreatment. Protecting young children often does require the kind of increased monitoring and control that these proposals include. In the same vein, it is important to recognize when families do not need ACS intervention. Increased training for ACS and Agency caseworkers would ensure that monitoring is

accomplished appropriately and that the proper level of supervision is being provided. A one size fits all model would not be effective.

When allocating scarce resources to increased monitoring and closer supervision, ACS should bear in mind that additional scrutiny might not be necessary for most older children. Older children can, and frequently do, make the decision to leave an unsafe situation. They can, and frequently do, reach out to adults they trust when something is wrong in their lives. Moreover, they are most often in daily contact with adults – teachers, counselors, and service providers – many of whom are mandated to report suspected maltreatment.

The package of reforms proposed by Mayor de Blasio in the wake of Myls Dobson's death should be only the beginning of an ongoing review of the policies and procedures necessary to ensure the safety of all children in New York City. Of particular importance, as noted above, is the need to engage a variety of City and State agencies – including the Departments of Probation, Corrections, and Parole to work with the Administration for Children's Services to assist parents in providing safe stable homes for their children. In that vein, we are heartened by the creation of the NYC Children's Cabinet. In our experience, in addition to having the potential to leave a child at risk of harm, poor communication among City and State agencies can undermine the efforts of one agency to ensure family stability and positive outcomes for children. We recognize that the Children's Cabinet has just been formed, and we look forward to learning more about its work to build inter-agency collaboration for the benefit of New York City's most vulnerable children.

We hope that the City Council will continue to evaluate the proposed reforms as they are implemented, and continue to press all local agencies that have contact with parents and children to take all appropriate steps to work with those families and with ACS to keep the children safe.

We are available to assist in any way possible to improve the services and quality of care for children who are in need.

Contact Information:

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110 Lafayette Street
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212-966-6420
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For the Record

Good Morning Ladies and gentlemen and City Council members, My name is Maxine King and I am a Formerly Incarcerated woman with a history of Child welfare involvement. I am also a mother, a grandmother, a community organizer, an upcoming Masters of Social Work (MSW) graduate, Child Welfare Organizing Project (CWOP) Board Member, and a Credentialed Alcoholism Substance Abuse Counselor (CASAC).

In 2011, I was blessed with my 1st grandson Kevin Jr. At 3 months old Kevin's mother had some allegations of neglect brought against her and he was placed in foster care. At the time I thought with all I had accomplished I would reach out to the agency and request to be considered as a resource for kinship care. However after speaking with the Case worker I was informed that as a result of criminal charges pending from an ongoing court issue resulting from organizing around stop and frisk I would be unable to be looked at until the case was resolved. The case was resolved last year and again I requested to be looked at as a resource for my grandson. This time, I was told that the agency was in the process of returning him back to his parents and it would be best not to move him again- see to date he has been in 7 foster homes.

Kevin was subsequently returned to his father last November and was removed again in December. The agency states that dad failed the trial discharge because he left Kevin alone with his mother. Kevin Sr contends that he found employment and had to leave child with mom because when the agency returned the child they did not provide him a referral for child care. In fact the agency did not provide this new father with any resource.

Again I stepped up and requested that the child be placed with me- this time the agency supervisor informed me that I cannot be considered due to my criminal history. I know that wasn't true so I petitioned the court for custody- its been 5 months since Kev was returned to care and he continues to reside in another foster home- and the agency even attempted to change the goal to adoption However the court has rectified this and Kevin will be returned to his mother.

If the goal of our Foster care system is ensure the safety of children- and ASFA ensures that children no longer languish in the system why is it that Kevin is now 3 years old and has been in care since he was 3 months- despite the fact that he has family that loves him. Formerly Incarcerated families members should be given the opportunity to be evaluated to become a Kinship resource.

Child Welfare Organizing Project

OUR FAMILIES, OUR CHILDREN. IT'S TIME FOR CHANGE!



ALL PARENTS of children who would like to be informed about New York City's Children's Services (ACS), foster care, or preventive services:

CONTACT THE CHILD WELFARE ORGANIZING PROJECT (CWOP)

Monday-Friday at 9am to 5pm

We are an organization of parents and professionals who have been affected by the child welfare system. We believe that by organizing, dedication, and working together we can transform the child welfare system to support children and families.

- Do you think ACS should be respectful of children and families?
- Are you a parent, an aunt, an uncle or concerned citizen?
- Do you have children who are or who have been involved in NYC's (ACS) foster care or preventive services?
- Learn more about your rights as a parent, working with other parents to change policy to ensure children and families receive the services they need.

Come to CWOP and organize to transform the child welfare system by attending:

- Organizing meetings
- Weekly Parent Self-Help Support Group (Wednesdays from 11-1)
- Learn about CWOP's Annual Parent Leadership Curriculum Training

To learn about the impact of child welfare in your community

cwopexecutivedirector@gmail.com

TEL: 212 348 3000

80 East 110th Street, Suite 1E, New York, NY 10029

cwop.org

FAX: 212 348 1605

City Council Testimony

May 8, 2014

Good Day

I have been affected by the system since 1988 when I gave birth then to my 5th child and even though I had more children that went into care I have finally regain custody of my youngest 2 and gotten my life back together

I have been clean for 13 years now and recent 2 years of cigarette free also even though my rights were ~~TPR~~ TPR they too are also back in my life, I gave birth to 11 children in which 9 of them are back in my life 2 I have not found yet but will one day, being a Parent Organizer with CWOA I have seen some impraement within ACS it can be better as far as communication and the judging and also how they so quick to put Mental Illness on some families because they are angry that either you want to remove or tear apart a family inste of the time it is minor where it can be fix, not every child

needs meds because they are saying
they want to be home, not enough
time to really go in on how it
can really improve but my
question is

Now, Can you really tell if
a child is abuse or Neglected

Thank You,

Tracey Carter
Parent Organizer
Child Welfare Organizing
Project Staff

Who is CWOP?



The Child Welfare Organizing Project (CWOP) is a parent / professional partnership dedicated to public child welfare reform in New York City through increased, meaningful parent involvement in service and policy planning. Founded in 1994 with a grant from the Child Welfare Fund to the Hunter College School of Social Work, CWOP's early research led to the conclusion that clients, particularly biological parents, had practically no voice in NYC's public child welfare system.

Today, parents who have had direct, personal experience with the system:

- Have formed an active Parent Advisory Work Group to the New York City Administration for Children's Services (ACS)
- Work as peer advocates in over twenty foster care, preventive and legal services organizations and organize the Parent Advocate Network (PAN) to support and organize the peer advocates
- Guest lecture at virtually every area school of law and social work, and develop training curricula for the public & voluntary sector child welfare workforce
- Have created and delivered thirteen annual cycles of a peer-led Parent Leadership Curriculum. *Over half the curriculums graduates have secured employment as Parent Advocates. Over 70% of those who had a child in foster care when they entered the Curriculum had reunited with their family by the time they graduated six to eight months later.*
- Instigate the creation for a Proposals for interdisciplinary providers of legal services that has since revolutionize the nature and quality of representation available to low-income parent responding to child maltreatment allegations in Family Court
- Write for RISE Magazine (www.risemagazine.org) & work actively with the media to challenge the racist stereotypes of ACS-involved families that depreciate service quality

- Are working with the ACS Division of Research and Evaluation to create family interview instruments for use in performance evaluation of ACS Preventive Service and Foster Care contractors.
- Serve as Community Representatives at Child Safety Conferences, and act as visit hosts and visit coaches

Since CWOP New York City's foster care population and involuntary removals of children from their families declined by around 50%. Referrals for preventive services increased by 25%. And the leadership of ACS has made neighborhood based family support and preservation more central to ongoing system reform efforts

CWOP Weekly Support Group

For parents involved with the NYC Child Welfare System (ACS, Foster Care & Preventive Services)

Are you feeling stressed, confused, disrespected and frustrated?

YOU ARE NOT ALONE!

PARENT SELF-HELP SUPPORT GROUP

We share our knowledge, experience, supporting one another and organize for change!

...locations and info on back...

**Weekly Parent Self-Help
Support Group**

LOCATIONS

East Harlem:
Every **Wednesday**
11:00am-1:00pm
Location on back
Teresa:(212) 348-3000

Highbridge:
Location: *Call for Location*
Rosa Rosado:(718) 293-4352

*We suggest calling ahead to
confirm your attendance.*

Thank You



Child Welfare Organizing Project

CWOP is currently supported by The Child Welfare Fund, The Daphne Foundation, The JPMorgan / Ira W. DeCamp Foundation, The Highbridge Partnership for Family Supports and Justice, The Maidstone Foundation, New York Foundation, The North Star Fund, a consulting agreement with Little Sisters of the Assumption Family Health Service / NYC Children's Services East Harlem Community Partnership Project, a variety of individual donors, and discretionary grants from New York City Council Members Maria del Carmen Arroyo, Melissa Mark-Viverito & Annabel Palma

**Child Welfare Organizing Project
East Harlem Neighborhood Center
80 East 110th Street, #1E,
New York, NY 10029**

Tel: (212) 348-3000

Fax: (212) 348-1605

Sandra Killett

Executive Director

E-mail: cwopexecutivedirector

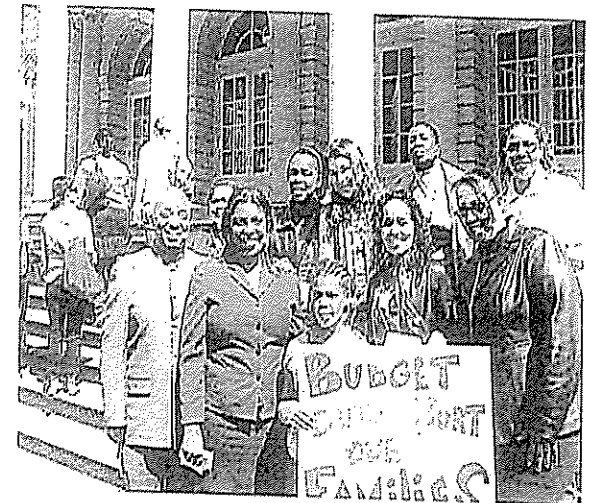
@gmail.com

www.cwop.org

**Child Welfare
Organizing Project**



Child Welfare Organizing Project



CWOP

Tel: (212) 348-3000

www.cwop.org

**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: Eden Hauslib, Acting Deputy Commissioner

Address: 150 William St NY NY

I represent: NYC Administration for Children Services

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: Melissa Plowden-Norman

Address: 662 MacDonough Street

I represent: Community-Bed Stuy Advocates, Inc

Address: 185 Marcy Ave

**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: 5/8/2014

(PLEASE PRINT)

Name: Rose Lovaglion-Miller

Address: 3001 Tiemann Ave. Bx, N.Y.

I represent: SSEU L. 371

Address: 817 Broadway, 14th FL NY NY

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: _____

(PLEASE PRINT)

Name: MICHELLE AKYEMPONG

Address: 817 BWAY

I represent: SSC - LOCAL 371

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: 5/8/14

(PLEASE PRINT)

Name: Maxine King

Address: 2055 Cuyler Ave Bx NY 10469

I represent: Child Welfare Organizing Project

Address: 80 E 110 St NY NY 10029

**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: 5/8/14

(PLEASE PRINT)

Name: Rolando Bini

Address: 3459 Junction Blvd.

I represent: Parents in Action

Address: 3459 Junction Blvd, NY 11372

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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: 5-8-2014

(PLEASE PRINT)

Name: Meg Baier / CWOP

Address: 81 Oakes Ave. Brooklyn, NY 11226

I represent: CWOP

Address: 80 E. 110th St NY, NY 11226

**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: 5/8/14

(PLEASE PRINT)

Name: Rose Vital

Address: 109-32 217st Queens Village NY 11428

I represent: Child Welfare Organizing Project

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: 5/8/2014

(PLEASE PRINT)

Name: Tracy Carter

Address: 21

I represent: CWOP / CHILD Welfare Organizing Proj

Address: 80 East 110th Street NY, N.Y.

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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: 5.8.14

Name: Sandra Killeth (PLEASE PRINT)

Address: 80 E. 110th St Ste 1E

I represent: Child Welfare Organizing

Address: Project 80 E 110th St Ste 1E
NYC 10029

**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: _____

Name: Jackeline McKnight (PLEASE PRINT)

Address: 150 William St

I represent: ACS

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: 5/8/14

Name: Mary Wroten (PLEASE PRINT)

Address: 920 Kelly Street Apt 2B

I represent: Child Welfare Organizing Project

Address: 80 E 110 St Apt 1E

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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: ANTHONY WIFILS

Address: 817 BROADWAY

I represent: SSEA L. 371

Address: 817 BROADWAY

**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: 5/8/14

(PLEASE PRINT)

Name: Stephanne Gendell

Address: _____

I represent: Citizens' Committee for Children

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: 5/8/14

(PLEASE PRINT)

Name: Nedene Simon

Address: 190 Forsyth St. N.Y. 10002

I represent: CWOP Child Welfare Organizing Project

Address: 110 St

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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: May 8 - 2014

(PLEASE PRINT)

Name: Souad Karama

Address: 33-10 34 Ave # 3 D Astoria NY 11106

I represent: Muslim and Arabic Community

Address: CPP Community Partnership of Elmhurst

**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: Damaris Figueroa

Address: 425 East 185 St 13D NYC 10029

I represent: Child Welfare Organizing Project

Address: 80 East 110 St 1E NYC 10029

**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: May 20 2014

(PLEASE PRINT)

Name: Iris Parra

Address: 118 Ave D Apt 56 NY 10009

I represent: _____

Address: _____

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

Appearance Card

Date: 05/08/2019

Name: Kim Kennerly
Address: 879 Bruckner Blvd Apt # 2 Bronx NY

Address: _____

Appearance Card

Date: _____

Name: Herman Morales

Address: 40-11 79th Street

I represent: Cowell Hospital Community Advisory Board

Address: CLINICAL TRIALS UNIT 24 BAKER Gt ST

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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: 5/8/14

(PLEASE PRINT)

Name: Barbara Graves-Poller

Address: 299 B'way

I represent: MFY Legal Svcs.

Address: 299 B'way, 4th floor

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: _____

(PLEASE PRINT)

Name: Gladys Carrion, Commissioner

Address: 150 William St NY NY

I represent: NYC Administration for Children Services

Address: _____

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