



Nancy Ginsburg
Deputy Commissioner, Division of Youth and Family Justice

Testimony to the New York City Council
Children and Youth Service Committees
April 24, 2024

Oversight: Evaluating the Close to Home Program

Good afternoon, Chair Stevens and members of the City Council Children and Youth Committee. My name is Nancy Ginsburg, and I am the Deputy Commissioner for the Division of Youth and Family Justice (DYFJ) at the Administration for Children's Services (ACS). I oversee the full range of services for justice-involved youth and their families, ranging from community-based programs engaging youth and families in their communities, to nonsecure and secure detention and, of course, our Close to Home program. I am joined today by Johan Peguero, the Associate Commissioner for Close to Home and Nonsecure Detention.

We are very pleased that the Council is interested in learning more about the Close to Home program today, which has been nationally recognized for transforming juvenile justice and improving outcomes for youth. Since the creation of Close to Home in 2012 (and the advocacy preceding it), there have been many advocates, providers, state and city legislators, city agency staff, and, most of all, youth and their families, who have helped to shape Close to Home into the model it is today—and I want to take a moment to thank each and every one of them, including those who are here today. The success of Close to Home is a reflection of all of those who have come together, and continue the work to advance policies and programs that improve our ability to improve outcomes for youth.

In today's testimony, I will share some background and history of the creation of Close to Home, discuss Close to Home today, and then share the vision for the future, with our new contracts that go into effect July 2024.

Background and History

State legislation authorizing Close to Home was signed into law in 2012. This landmark legislation transformed New York City's juvenile justice system by authorizing the City of New York (rather than the state) to provide the care and custody of New York City youth ordered by a New York City Family Court judge to be placed in a facility as the disposition of a juvenile delinquency proceeding.

This transformed the experience for these youth who under the prior laws were often sent to large, upstate facilities, where family connection was challenging, educational credits often did not transfer, and as a result the outcomes for the youth were quite poor.

By contrast, Close to Home facilities are small, group home like settings operated by non-profit providers, most of which also offer foster care. All facilities are located in New York City with the exception of one site in Westchester, and family engagement is a key component of the program, with families included in case planning, visits and service provision. Each Close to Home program uses an evidence-based therapeutic program model to provide behavioral supports for the young people. Almost all youth placed in Close to Home facilities attend New York City public schools—all credits earned transfer to community schools upon release. Youth also participate in DYCD SYEP and after-school programs, work with credible messengers, participate in behavioral health and substance abuse programs, and have access to a broad range of programming services. All youth leaving Close to Home receive up to 6 months of aftercare services when they return to the community.

There are two types of Close to Home facilities: non-secure placement (NSP) and limited secure placement (LSP). Nonsecure placements facilities are home-like settings, typically in retrofitted brownstones that look much like group homes. Limited secure placements have more security features, such as a control room monitored 24 hours a day, properly maintained perimeter with motion sensors and security fences.

We have come a long way in the past 15 years since initially implementing Close to Home. In July 2012, there were 435 youth placed by the Family Court in OCFS facilities. Today, there are about 100 youth placed in Close to Home residential facilities. For all of 2023, there were a total of 163 youth who were served in a Close to Home facility. This reduction was achieved despite the fact that in 2018, the age of criminal responsibility was raised, so now Close to Home is also available to youth adjudicated for offenses committed at age 16 and 17 (in 2012-2018, only youth under the age of 16 when the crime was committed were eligible for prosecution in Family Court).

In fact, after Raise the Age passed, ACS anticipated that the Close to Home system would grow so we increased to 301 beds by adding beds at existing sites. The success of Raise the Age was soon evident, and we saw that admissions to Close to Home actually decreased rather than increased. This is because youth whose cases are heard in Family Court and are the only youth who can be placed in Close to Home, were not being ordered into placement as frequently. It is important to note that youth whose needs can be met in the community are receiving supportive services while living at home, while only the youth adjudicated on the most serious offenses or who are not receptive to community-based services are being placed in Close to Home facilities.

As a result of the decreased census in Close to Home, ACS has been taking steps to rightsize the Close to Home system. The current capacity is 201 and with the new contracts, it will be 147.

Close to Home Program Highlights

In 2023, 111 youth were admitted to Close to Home. Eighty-eight percent of the youth were males and 12% were females. The admissions are 61% African American, 27% Latinx, 3% White, 5% Asian. Youth age at admissions ranged from 13 years old to 20 years old, with 73% of the youth being 15-17 years old at the time of admission. Ninety-two percent of those youth were placed in Close to Home for the first time. The median length of stay was 218 days for those youth released in 2023. In addition, in 2023, the average daily number of youth receiving Close to Home aftercare services was 31 and 105 youth participated in aftercare.

Close to Home providers are required to implement evidence-based therapeutic program models that serve as the primary mechanism of behavioral support. These include the Integrated Treatment Model, the Missouri Model, Sanctuary, and Positive Behavior Intervention System. The treatment modalities that are implemented in programs have core foundations of Cognitive Behavior Therapy, Dialectical Behavior Therapy, and Solutions-based Treatment to name a few, which are effective with our population. For youth who are identified as having a specialized need, such as a developmental disability, being a commercially sexually exploited child, having a problematic sexual behavior or severe substance misuse, treatment is tailored and adapted to address the need. Trauma related interventions are part of this clinical

continuum, and afforded to all youth in placement. In addition, our programs are required to have an established relationship with a board- certified psychiatrist who can assess the need for psychotropic medication upon referral. Substance misuse is also screened, assessed and treated in line with evidence-based practices approved by OASAS.

In addition to the provider's evidence-based program model, ACS requires that the Youth Level of Service Case Management tool is integrated in programming. This framework utilizes the Youth Level of Service Inventory (YLSI), a validated Risk Assessment Instrument used to identify criminogenic risk factors among young offenders, as the foundation for case planning, and service delivery for all youth. The YLSI assesses criminogenic risk as either Low, Moderate, or High in eight domains. The tool allows for risk assessments around peer relationships, substance use, family circumstances, prior and current offenses, attitude and orientation, leisure, education and personality and behavior. With thoughtful development and planning, the Risk-Needs-Responsivity framework has been designed to account for individual youth strengths as motivation in treatment and to foster positive long-lasting service linkages.

ACS and our providers have fully embraced programs, interventions and strategies tailored to each youth's individual development and learning capacity. Through the chosen program framework, youth are given the opportunity to address their interpersonal relationships, communication skills, emotional regulation and achieving the goal of eliminating/reducing high behaviors.

Most youth in Close to Home received their education at Passages Academy operated by NYC Public Schools: youth in non-secure placement attend school at Bronx

Hope or Belmont in Brooklyn; youth in limited secure placement attend schools at the facility. Youth placed at Children's Village attend the Greenburgh School on the campus in Dobbs Ferry. Passages Academy supports middle school instruction, high school instruction and high school equivalency instruction. Passages Academy School Counselors and social workers provide guidance counseling, special education services and transition support when youth return to the community.

Upon entry into Close to Home, youth are evaluated by NYCPS and then placed in a class program that matches their needs. While most youth are in Close to Home placements for less than a year, the youth are successful at receiving school credits and passing Regents exams. In the 2022-2023 school year, 65 NSP youth were enrolled in Passages, 88% of whom were in high school and earned an average of 7.1 credits (86% of students earned 10 or more credits during this time). In the 2022-2023 school year, 25 LSP youth were enrolled in Passages Academy, 92% were in high school and an average of 6.7 credits were earned (73% earned over 10 credits.) These students also passed a total of 16 Regents exams. When there are youth in Close to Home who are college-ready, we work with NYCPS for CLEP classes, engage with community colleges for courses and some youth attend college courses in the community.

By anchoring Close to Home with the principles of Positive Youth Development, the programs focus on resiliency, leadership skills development, academic and professional growth. The programs offer youth an opportunity to engage in programming that promotes prosocial skills, vocational and academic engagement, creative and performing arts, and positive adult/peer mentoring. For example, Close to Home providers partner with Cure violence providers to train youth to be Junior Credible

Messengers; Exalt helps elevate youth voice; Kite creative writing helps youth write and showcases their work; and Carnegie Hall offers workshops, musical training and public performances. Most recently, ACS has added the successful Fair Futures coaching model, to provide youth in and leaving Close to Home with coaches that can remain with them until age 23.

Having youth close to their families allows the inclusion of the youth's family in case planning, visits and service provision. In Close to Home, we use the family team conferencing model to engage families in all decisions and challenges the youth may be facing. Reunification of the family is important for youth's transition home to their communities.

Youth returning to the community typically receive at least 6 months of aftercare supervision from ACS and support from their Close to Home provider. As mentioned, youth also now have access to a Fair Futures coach when they return to the community which a youth can continue to lean on after they complete our program. Most youth in Close to Home successfully transition back to the community. In 2023, 92% of the youth admitted to Close to Home were admitted for the first time and just 2% of youth admitted to secure and nonsecure detention had previously been in Close to Home.

The Work Ahead

In March, ACS announced the providers recommended for awards for the new contracts starting July 2024. The providers include Children's Village, Good Shepherd Services, Rising Ground, SCO, and St. John's, who will operate a total of 14 sites, with 147 beds. Notably, the original Close to Home contracts predate the implementation of

Raise the Age. Today, the youth in Close to Home tend to be a little bit older and often present with more challenging needs.

The new contract awards aim to strengthen the Close to Home system of care by rightsizing the system while providing the providers with additional resources needed to care for the post Raise the Age population of youth in their care. Program capacity was decreased from 13 to 9 allowing for more individualized programming. The new contract budgets were increased to fund specific lines to help improve the overall programming and offer a more robust treatment approach. These lines now include funding for:

- Fair Futures
 - Educational/Career Specialist
 - Fair Future Coach
 - Fair Future supervisor
- Aftercare staff:
 - Crisis Specialist
 - Aftercare Supervisor
 - Peer Mentors
- Recreational Specialist
- Increased staffing ratio of 3:1 (from 6:1)
- Intake Coordinator
- Mental health team required to include:
 - Therapist
 - Psychiatrist
 - Substance Abuse Counselor

To address permanency issues with our older youth in our system. ACS created a transitional program referred to as Transitional Residential Care (TRC). Youth entering the TRC will be provided with supports which encourage personal growth, development, and empowerment to make mature and healthy decisions. TRC will also offer youth case management, educational/ vocational services and will help them connect with a variety of community resources to enhance their co-designed personal development plan and most importantly help youth achieve permanency. TRC will

support the goal of serving youth in the least restrictive, most home-like setting possible and is due to begin in July.

Conclusion

I would be remiss if I did not mention that when Close to Home was created, it was a cost-sharing partnership with the state, where the state funded approximately half of the cost (\$30.5 million). Unfortunately, after the initial statute sunset in 2018, and the statute was reauthorized, the state eliminated all state funding and support for Close to Home. ACS continues to feel strongly that the state should support New York City youth in placement, as they do for any other youth in placement for any other county.

That said, at ACS we are excited about the future of Close to Home and the work we can do with our providers to help turn the lives of youth around so that they can thrive and become successful adults. We believe our new contracts build upon the success of the Close to Home initiative and that we will now be able to better serve the older population in our care.



Advocates for Children of New York

Protecting every child's right to learn

Testimony to be delivered to the New York City Council Committee on Children & Youth

Re: Evaluating the Close to Home Program

April 24, 2024

Board of Directors

Kimberley D. Harris, *President*
Harriet Chan King, *Secretary*
Paul D. Becker, *Treasurer*
Eric F. Grossman, *President Emeritus*
Carmita Alonso
Matt Berke
Whitney Chatterjee
Matt Darnall
Jessica A. Davis
Brian Friedman
Caroline J. Heller
Jamie A. Levitt, *past president*
Maura K. Monaghan
Jon H. Oram
Jonathan D. Polkes
Victoria Reese
Ashish Shah
Veronica M. Wissel
Executive Director
Kim Sweet
Deputy Director
Matthew Lenaghan

Thank you for the opportunity to testify. My name is Elisa'Beth Bernard, and I am a Staff Attorney at Advocates for Children of New York. For over 50 years, Advocates for Children has worked to ensure a high-quality education for New York students who face barriers to academic success, focusing on students from low-income backgrounds. We speak out for students whose needs are often overlooked, such as students with disabilities, students from immigrant families, students who are homeless, students with mental health needs, court-involved youth, and students in foster care. As an attorney on AFC's School Justice Project, I represent court-involved youth as they navigate the significant challenges of receiving educational services and special education services both while they are in placement and as they are transitioning out of placement.

In recent years, we have seen some positive shifts in the education services youth receive while in Close to Home programs and the quality of transition services once their time in Close to Home programs ends. Despite some positive changes, there is still a need for improvement in certain areas, including ensuring families get needed information about their child's educational progress while attending Passages Academy and ensuring students have a safe and appropriate school to attend as soon as they return home.

We see these issues in our work with families who have children currently in the Close to Home program and children fully transitioned out of Close to Home. Currently, we are assisting a family whose child spent 11 months in a Close to Home program. During the student's time in the program, the family never received progress reports, phone calls, emails, or notice of their child's progress while attending Passages Academy. The DOE never gave the family an opportunity to attend IEP or Special Education Plan meetings or notified the family if the student had earned any credits. The family, instead, often made visits to the Close to Home



Advocates for Children
of New York
Protecting every child's right to learn

site, where they were merely told the student was doing “OK but could make improvements.” Especially considering this specific student had an IEP and needed additional support to succeed in school, the parent expressed her concern about the lack of information and the uncertainty around her child’s graduation status. To help keep students on track, it is important for the DOE and ACS to ensure families are informed of their child’s educational progress while in the Close to Home program and receive notice of their child’s IEP or Special Education Plan meetings.

The city must also ensure there is better communication between ACS, Passages Academy staff, and the various DOE offices that help to re-enroll students in school as they return home. Often, we see a lag in the amount of time it takes a student to receive an enrollment letter from the DOE once they return home. In fact, we have seen students spend anywhere from three weeks to two months waiting for a school placement. Parents express confusion about the appropriate offices to contact for assistance, and when they do finally speak to someone, some have shared that they are given very little information on how such issues can be resolved. These parents have shared that the frustration of waiting often leaves their children idle, which could lead to further involvement with the juvenile system.

Poor reentry planning also contributes to student placement in inappropriate and unsafe school settings for youth transitioning from Close to Home. Currently, I am working with a student who was placed in a local school shortly after his return home. However, on the second day of school he was jumped by a group of students he knew from his community. It is no secret that youth with court involvement have unique and complicated stories, which contribute to their struggle to feel safe within their own neighborhoods.

Considering these safety issues and the importance of reenrolling students in schools that will meet their needs, both the DOE and ACS should engage in more targeted re-entry planning for students, which ensures they can reenroll in school right away, that they are returning to schools that are safe for them to attend, and that there is a plan for them to commute to and from those schools safely. With this intentional planning, DOE and ACS could help to improve family experiences and keep youth safe, in school, and out of the juvenile system.

Thank you for the opportunity to speak with you. I would be happy to answer any questions you may have.



**NYC Council Committee on Children & Youth
FY 25 Preliminary Budget Hearing
Friday, March 22, 2024**

Testimony Submitted by the Committee for Hispanic Children & Families (CHCF)

Thank you, Chair Stevens and the Committee on Children & Youth, for the opportunity to testify on the FY 25 budget for DYCD and ACS. The Committee for Hispanic Children & Families, better known by its acronym, CHCF, is a non-profit organization with a 42-year history of combining education, capacity-building, and advocacy to strengthen the support system and continuum of learning for children and youth from birth through school-age. While our primary focus and direct services are around access to high quality, culturally responsive and sustaining early learning and school-aged education, we understand that many intersectional circumstances and experiences within the community impact the well-being of children and their family support structures. As such, we deliver holistically responsive services within the schools, early care and learning programs, and wider communities we serve across NYC, through and beyond our state and city contracted programs and services.

Overview of Our Services

CHCF's Early Care and Education team supports child care and early learning programs, and family access to child care (birth through school-age) in our work as a Child Care Resource & Referral (CCR&R) Agency¹ and as a Family Child Care Network under the Department of Education. Our Youth Development team delivers after-school programming in partnership with three schools in the Bronx and career and college readiness programming to high school juniors and seniors at three schools in Manhattan and the Bronx. Above and beyond the academic supports we offer in our school-based programs, we support mental health and social emotional development, student interest and career exploration, and connection to additional resources and opportunities beyond the school walls. Our Social Services team oversees direct supports and services at one of the hotel-based shelters for asylum seekers in Long Island City, ensuring culturally and linguistically responsive and trauma informed support to newly arrived families navigating complex city systems. Finally, our Community Empowerment Department enhances our general delivery of comprehensive supports in direct program spaces, expanding the reach of our agency services and supports beyond these physical spaces into the surrounding communities, addressing several issues, reflective of the needs of the families and communities (i.e. housing, immigration, food access, healthcare access, etc.).

School-Based Youth Development Programming

During a school year, CHCF provides after school programming at three different schools in the Bronx, with a capacity to reach 550 students, and by extension their families: 250 students at PS 59 (about 55% of the K-5 school population); 140 elementary students and 100 middle school students at PS/MS 279

¹ NYC Child Care Resource & Referral Consortium. <https://nycrr.org/>





(roughly 33% of the school population); and 60 students at PS 226 (18% of the K-5 population). During the summer of 2023, we continued to extend our services at PS/MS 279 to deliver Summer Rising programming for over 200 students (137 elementary students and 65 middle school students).

CHCF demonstrates the value-add of connecting community-based partners with schools to comprehensively meet the unique needs of children and their families. CBO partners, like CHCF, help to facilitate holistic address of intersectional issues that children and families are facing, and we are well-positioned to connect families with resources and services, both within our respective agency and with other CBOs and agencies in the community and city that might function outside of educational spaces. CHCF therefore stands in solidarity with community-based advocates in defense of programs that maintain and grow these partnerships and that have demonstrable positive impacts on the communities served.

A critical means of growing effective and impactful CBO partnerships with schools is an expansion of city-funded out of school time programs so that we can create universal access to high-quality, culturally and linguistically responsive after school and summer programming, and the subsequent wrap around services that families and communities need. CHCF contracts with both the state and city to deliver after school programming. Specifically to city contracts, CHCF delivers Empire State After School as a subcontractor of the NYCPS, and SONYC after school for middle school students; in addition, CHCF, has partnered with the city to deliver Summer Rising. With our nearly 25 years serving the Bronx in this capacity, we have continuously spoken to the large demand for safe and affordable spaces for families to send their children to be positively engaged during after school hours and summer months. Year after year, we have continued to see a steady waitlist and our staff have carried the stress of communicating with families desperately trying to secure a slot.

The successful launch of Summer Rising in response to the pandemic has further underscored the long-felt difficulties faced by families seeking safe spaces for their children during the summer months. With growing waitlists in response to the reduction in available slots in years since Summer Rising's launch, it is clear that the need for this program goes beyond academic recovery supports following the pandemic.

CHCF continues to join advocacy efforts to expand the reach of state funded programs, but the city should also find ways to continue growing its after school and summer programming towards universality. **The city must ensure a continuation of the critical out of school time programming, and restore \$6.9 million to COMPASS, preserving programming for 3,538 students; as well as restore \$19.6 million to ensure full day and week Summer Rising for middle school students. We continue to call on city and state leaders to move towards universal out of school time programming, for both after school and summer programs.**

CHCF additionally delivers college and career readiness programming to high school students in Manhattan and the Bronx through our Opening Doors to the Future program. This impactful program works through Work Learn Grow funding and additional resources secured by our organization, supporting youth to connect to professional internship opportunities, and build their understanding of expectations in a professional workplace. ODF further supports participants in building their resumes, learning to identify their marketable skills with an eye towards growing their strengths, addressing





challenges, and pursuing their interests as they plan for the future. Over the years, all students who have gone through this program have successfully been promoted to the next grade level or have graduated, with the overwhelming majority moving on to college following graduation.² It is with this critical and impactful CHCF programming in mind, that we stand in solidarity with all programs focused on building college and career readiness for high schoolers. Whether it is SYEP, WLG, or Learning to Work – these programs *all* demonstrably uplift student academic growth, open opportunities to connect with professional workplace experiences, and in many cases contribute to the financial stability of their families through paid internships.

CHCF therefore calls on city leaders to restore \$33 million to the Learning to Work program. Additionally, the city must remain committed to investing in programs that work directly with high schoolers, offering positive spaces with which to engage this particular age group, where they are connected to mentors, academic supports and guidance, and college and career exploration and readiness.

Early Care and Learning Programming

As one of four Child Care Resource & Referral agencies in the NYC CCR&R Consortium, we are funded by New York State through Child Care Development Block Grant (CCDBG) funds to support families in accessing child care that is responsive to their family’s culture, language, schedule, and particular child needs; and support their navigation of often complex bureaucratic systems to access free/affordable child care. Parents/guardians can be connected to CHCF or any of the CCR&Rs through 311 if they are looking for care, birth through school age, and if they need support in determining potential eligibility for subsidy/vouchers and in navigating city systems of access.

Additionally, through our work as a NYC CCR&R, CHCF supports child care providers with linguistically responsive technical assistance and intensive coaching. CHCF predominantly (but not exclusively) delivers supports to child care providers in residential settings (Group Family and Family Day Care), overwhelmingly providers whose primary language is Spanish, across all five boroughs of New York City.

Our work on both the family and provider sides results in critical awareness of bureaucratic bottlenecks and flaws in system design and administration that ultimately harm the sustainability of our valuable child care sector, and the ability for families to readily access affordable child care that reflects their particular needs. Knowing how important ECE programming is for the healthy development of NYC’s children, particularly those who are from communities that have been historically under-resourced; and for the stability of parents trying to navigate work and family needs, it has been alarming to see the administration’s shifts away from growing access to these essential programs. To be clear, movement away from ensuring access to affordable, quality, full day/year care is misrepresentative of the true needs of families and children and undermines the critical importance of the early care and learning workforce – who are overwhelmingly women, women of color, and immigrant women. Any moves to reduce seats

² CHCF You Development FY 2023. [FINAL Youth Development FY 2023.pdf](#)





and maintain pay inequity will overwhelmingly harm providers, families, and children who have already been under-resourced and disenfranchised within city systems and decision-making spaces.

Systematically, there is continued insufficient outreach to families, particularly those in high-needs communities and demographics, to ensure they are aware of and have seamless access to free or low cost extended day/year care and early learning for which they are eligible – which further perpetuates a grossly inaccurate narrative that there is not a demand for what is available. Additionally, even with the new MyCity system to support family access to care options, there continue to be central system design flaws and malfunctions that are causing a confusion of care options for families, which increases the likelihood that they will not be connected to the care option that best meets their need (including hours/days of care reflective of need and program type that would best support family and child need).

CHCF calls for the safeguarding of investments towards universal PreK, 3K, and child care in NYC, and we further wish to highlight the need for appropriate central staffing and structured system supports to ensure equitable and timely access to programs that best meet family and child needs and ensure sufficient support for city child care programs (contracted and independent) to ensure consistent delivery of high-quality, evidence-based best practice programming for *all* child care settings.

It is also essential that NYC continue to support *all* NYC children in accessing early care and learning, regardless of their eligibility for federal funding-backed subsidies. **We continue to celebrate the \$20 million investment in Promise NYC in the FY 24 budget. Those funds have supported the care of 600 children who are deemed ineligible for federally funded child care solely due to their immigration status. CHCF joins many others in the belief that the need is far greater than that, and we call on the city to baseline the \$20 million and move to increase the investment in Promise NYC to better reflect the true need**, especially given the influx of asylum-seeking families. As an organization overseeing one of the hotels housing recently arriving families, the lack of access to child care continues to be a tremendous barrier in parents finding stable employment, and in family ability to establish stability and independence in the city; let alone the developmental and educational inequities this initiates for the children who are already experiencing extreme disruption and trauma with the migration to the U.S. and transition into NYC.

Thank you for the opportunity to present testimony; and if there are any questions about our work or what is presented in our testimony, please reach out to Danielle Demeuse, Director of Policy, at: ddemeuse@chcfinc.org or 212-206-1090 ext. 359.





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

Council of Family and Child Caring Agencies

**Written Testimony Presented by:
Katelyn Greco, Director of Prevention, Juvenile Justice and Equity**

**New York City Council
Close to Home Program Hearing
Wednesday, April 24, 2024**

COFCCA Written Testimony

I am Katelyn Greco, Director of Prevention, Juvenile Justice and Equity at the Council of Family and Child Caring Agencies or COFCCA. COFCCA represents more than 100 nonprofit child welfare agencies across New York State, including the five agencies that provide Close to Home programming here in New York City. On behalf of our member agencies, the thousands of employees, and tens of thousands of children and families served, thank you for the opportunity to testify at today's hearing on the Close to Home program.

Close to Home was created as a commitment from the City to keep juvenile justice involved young people close to their families, communities and support systems. Furthermore, Close to Home is an acknowledgement by the City that young people deserve the opportunity to be equipped with the tools needed to create healthy choices and decision making. Because of this, all Close to Home programming use a trauma-informed approach and focus on developing crucial prosocial skills such as social emotional intelligence, emotion coping, and conflict resolution.

Currently, the young people in Close to Home programming need more support and expansive level of services than ever. The ripple effect of programs closing down due to the COVID-19 pandemic, coupled with new legislation, such as Raise the Age, has led to older youth in care exhibiting more complex needs such as – continuous justice involvement, substance abuse, violent behaviors and gang or gun involvement. Moreover, facilities at any given time can have young people as young as 12 and as old as 20+ in their care. Between the more complex behaviors exhibited and wide range of ages in care, it is extremely challenging for staff to meet the specific needs of every young person without the proper resources, pay and support from the City.

Today, we lift up four priority areas as identified by the five NYC agencies with Close to Home contracts: 1) Address reduced system capacity with a growing census, 2) Invest in addressing safety concerns in facilities and for young people transitioning back to the community, 3) Enhance flexibility for new contracts, and 4) Invest in Pay Parity and

career enhancements for Close to Home staff. With support from the Council, we believe our priorities could open up pathways to improve the scope and quality of services provided to young people in the Close to Home continuum.

Addressing Reduced System Capacity with a Growing Census

ASK: The Council needs to ensure the City has contingency plans in place to address the growing needs for additional capacity and demands for Close to Home services.

Since the release of the RFP for the new contracts effective FY25, the census has continued to rise across the Close to Home continuum. For instance, according to ACS' March 2024 flash report, the number of Close to Home admissions rose 46%, calendar year-to-date January through February (from 13 in 2023 to 19 in 2023). Additionally, the Close to Home census rose 61% calendar year-to-date January through February (from 51 in 2023 to 82 in 2024). Specifically, the number of young people in non-secure placement increased 62% (from 41 to 66.5) and in limited-secure placement 58% (from 9.5 to 15)ⁱ.

The new contracts have reduced the overall capacity of the system from 201 to 147 slots. To reduce the system capacity, some programs are set to fully shut down, while others are reducing their capacity (most often from nine to six slots). Agencies acknowledge the benefits of having smaller programs, but with current programming nearing capacity, they worry how they can accommodate the growing census.

In past years, to meet the demands of an increased census, agencies were asked to add beds to increase capacity of their programs. This is not always a feasible solution due to agencies experiencing staff vacancies and other barriers to quickly increase program capacity. Instead of expecting agencies to add beds or over extend already understaffed programming, the City should develop a plan to manage the rise in

census. Additionally, the City should consider the impact on facilities when at capacity, such as having older and younger residents residing in close quarters.

Safety Concerns in Facility and for Young People Transitioning Back to the Community

ASK: The City needs to invest in de-escalation trainings for staff to ensure resident and staff safety in facilities.

Programs have reported an increase of violent behavior and contraband in facilities. It is imperative that staff are equipped with the necessary resources to ensure safety of all in the facility, while upholding a trauma-informed environment that is crucial to the success of Close to Home programming. One solution to strike this delicate balance is to invest in and expand de-escalation trainings offered to all facility staff. De-escalation trainings equip staff with effective strategies to ensure safety while not compromising the trauma-informed environment of Close to Home. Utilizing existing trainings such as the trainings Cure Violence/CMS sites use could be beneficial to Close to Home agency staff, in addition to the de-escalation trainings they currently receive.

ASK: The City needs to invest, create and expand programming for young people in Close to Home. Specifically, programming should also be tailored to meet the needs of young people engaged in gang and gun violence.

Programs report most young people in Close to Home are gang or gun involved. Programming needs to be created and expanded to meet the specific needs of gang and gun involved young people. Tailored programming, such as working with the City's Crisis Management System and credible messengers, will increase engagement, safety of young people, and decrease recidivism. Tailored programming is especially needed for young people transitioning back to the community. When young people enter Close

to Home with conflict in their community, that conflict is waiting for them when they return, making them vulnerable of being the target of violence. The City has a responsibility to ensure all young people exiting Close to Home facilities will be safe in the communities they return to.

We applaud ACS' goal to create more juvenile justice prevention programming, and encourage the input of credible messengers, young people in care, agency staff and other relevant stakeholders, to ensure programming is tailored, accessible and meaningful.

Flexibility Needed for the New FY25 Contracts

ASK: Increase funding for agencies to match the increase in resources required for new mandates.

As part of the new contracts starting in FY25, ACS has implemented staffing ratio mandates when transporting young people in care. Previously, agencies were able to use their own discretion to decide staff ratios during transports. Because of the new mandate, agencies are expending more staffing resources than they have in the past. This poses various challenges due to many programs being understaffed, and also, contracts failing to increase funding to match the additional resources needed to meet the required ratios. COFCCA plans to work with providers, ACS and the Council to further explore these challenges and identify what additional funding is needed.

ASK: The City must provide adequate funding with enough flexibility to support extensive and emerging needs of young people in care.

With older youth in care and the rise in more complex behaviors, staff more than ever need funding to support the basic needs of young people in facilities and transitioning back home to the community. Programs report the budget as it stands, does not have

COFCCA Written Testimony

adequate funding for agencies to truly ensure young people will have their basic needs met when they transition out of facility. When agencies have the capacity to help young people meet their basic needs, they also increase their ability to keep that young person safe. COFCCA intends to work with providers, ACS, and the Council to further the conversation and better understand what funding is necessary to meet the expansive needs of young people in care.

Invest in Pay Parity and Career Enhancements

ASK: Fund and support pay parity for Close to Home workers.

We appreciate the Mayor and Council's support for a 3% COLA. It is important to note that staff retention remains as a major hurdle for contracted providers as they continue to serve as a training ground for staff who quickly transition to government agencies for higher pay and better benefits.

COFCCA regularly surveys child welfare agencies to better understand workforce compensation. From our survey we found Statewide vacancy rates for residential care caseworkers/case planners in 2022 was 33.9% up from 24.2% in 2020. For caseworker supervisors the vacancy rate in 2022 was 24.5% up from 11% in 2020. Moreover, our survey highlights the current pay disparity between voluntary and governmental agencies. Residential care staff in the New York City area with a high school diploma/GED had a starting salary of \$36,705 compared to their ACS counterparts' (Youth Development Specialist) starting salary of \$51,787 for 2022ⁱⁱ. We need the Council's support to ensure Close to Home staff are paid fairly and equally for the same work as ACS staff. When the workforce suffers due to lack of adequate supports and staff turnover, program outcomes for young people will be negatively impacted.

Thank you for the opportunity to offer testimony to elevate the ongoing and emerging issues that impact Close to Home programming. We welcome the opportunity to

COFCCA Written Testimony

engage the Council in a conversation to discuss this important issue and to be helpful to you as budget decisions are made. We are available to answer any questions or for any assistance that you might need.

Katelyn Greco
Director of Prevention, Juvenile Justice and Equity
Council of Family and Child Caring Agencies
kgreco@cofcca.org
(212) 929-2626, ext. 207
254 West 31 Street, 5th Floor
New York, NY 10001

ⁱ <https://www.nyc.gov/assets/acs/pdf/data-analysis/flashReports/2024/03.pdf>

ⁱⁱ <https://cofcca.wildapricot.org/resources/Child%20Welfare%20Workforce%20Report%20-%20Line%20Workers%202022%20-%20Final.pdf>



Extraordinary reach.
Unconditional care.
Life-changing results.

Testimony by:

Jan Hassan-Butera
Program Director
Close to Home Program
SCO Family of Services

to

New York City Council Committee on Children and Youth

Wednesday, April 24, 2024

Good afternoon. My name is Jan Hassan-Butera and I am the Director of the Close to Home Program at SCO Family of Services.

I would like to thank Chair Stevens and all of the Members of the Committee on Children and Youth for allowing SCO Family of Services to discuss the important work of the Close to Home Program.

SCO Family of Services is a non-profit organization that helps vulnerable New Yorkers build a strong foundation for the future. We get young children off to a good start; launch youth into adulthood; stabilize and strengthen families; and unlock potential for children and adults with special needs. SCO has been providing vital human services through a network of over 80 programs throughout the metro area for more than 125 years.

Since 2007, SCO has proudly been providing youth justice services to court-involved youth and families. In September of 2012, we expanded our services and commitment to our Juvenile Justice work with the addition of the Close to Home program. Close to Home aligned with our values, vision, and passion regarding the need for juvenile justice reform and the need to address the disparity of the juvenile justice system, which disproportionately targets youth of color.

SCO currently operates five Close to Home Programs throughout Queens and the Bronx. SCO utilizes an evidence-based approach, the Missouri Approach, which has a strong focus on group dynamics and positive peer influence. There is a large focus on accountability, family dynamics, victim empathy, boundaries, communication, and healthy relationships. During placement youth are engaged in a wide array of services including onsite medical and clinical services, casework counseling, mentorships, psychoeducational group meetings, education and vocational services.

SCO has been fortunate to share in many successful outcomes for our youth and families. Close to Home has given youth the opportunity to become stronger community members through community service activities. A working relationship has been made with SYEP providers helping youth to gain early work skills. Youth have been certified in OSHA and have received assistance finishing their education and gaining employment. SCO has had multiple high school graduates, GED recipients, and youth employed full-time at the end of programming. SCO has fostered a strong partnership with Gallop NYC, allowing youth the unique opportunity to work with horses, participate in riding lessons, and volunteer with younger youth with disabilities. Additional highlights include youth registering to vote and voting for the first time, exposure to new and diverse educational, recreational, and cultural activities helping to expand their horizons and develop healthy new interests. Youth have also had opportunities to perform at Carnegie Hall, be members of their school Student Council, and display their artwork at art exhibits.

SCO is especially proud to have a former client, James join our workforce as a Youth Specialist (a direct support professional) at one of SCO's Close to Home residences. This young man was a resident for 9 months from 2015-2016. He truly worked the program and made incredible progress. Today, he is a role model and credible messenger to the youth and an inspiration to all who know him. His journey proves that change is indeed possible for the young people of the Close to Home program if they are given the opportunity.

SCO frequently utilizes consumer satisfaction surveys as well as many forums where youth are encouraged to give feedback on programming. Recent responses included "I'm glad programs like this exist because I don't have to deal with what my brother is going through (referring to an incarcerated sibling)." "Some of us don't have homes where we can go and get snack whenever we want." And, "I like the furniture you sent, my little sister always wants to hang out on it, I didn't have my own bed before."

There is still a need for the Close to Home Program. Youth need and deserve treatment, not incarceration. They have experienced trauma, neglect and lack of opportunities. The Close to Home Program addresses all of these areas and does much more. It gives a voice to youth who many in society don't value. It provides support to youth and families and connects them to needed services upon their discharge. It empowers youth to chart a new course for their lives and to become productive members of society.

In closing, on behalf of the youth served by SCO Family of Services, thank you Council Member Stevens and members of the Committee for your continued support of our work and the Close to Home program.



49 Thomas Street, 10th Floor
New York, NY 10013
(212) 577-3300
<https://www.legalaidnyc.org>

Alan Levine
President

Twyla Carter
Attorney-in-Chief
Chief Executive Officer

Dawne A. Mitchell
Chief Attorney
Juvenile Rights Practice

Lisa A. Freeman
Director
Special Litigation Law Reform Unit
(212) 577-7982
LAFreeman@legal-aid.org

**New York City Council
Committee on Children and Youth
April 24, 2024**

**Oversight Hearing:
Evaluating the Close to Home Program**

Testimony of The Legal Aid Society

199 Water Street
New York, NY 10038
(212) 577-3300

Prepared by:
Lisa Freeman
Judith Harris
Kate Wood

The Legal Aid Society thanks Chairperson Stevens and members of the Committee on Children and Youth for holding this oversight hearing to evaluate the Close to Home (CTH) Program. We welcome and encourage the City Council to continue to exercise its oversight powers to ensure that this program adequately and effectively serves youth for whom placement is deemed necessary by the Family Court.

There is no doubt that CTH is better than its precursor, which sent children far from their families and communities to large institutions for juvenile placement. Before addressing ways in which CTH and Aftercare can be improved, it is important to note that the City is planning to reduce its capacity for Close to Home at the same time that it is expanding its capacity for juvenile detention at Horizon through a multi-year plan and has reduced its capacity for alternatives to detention and placement.¹ The City must rethink its approach; it should press the state to permit the use of Close to Home beds for juvenile detention purposes, rather than engaging in an expensive capital project to expand detention, and it should increase alternatives to detention and placement.

The rehabilitative mandate of the Family Court Act must be taken seriously.² The children who suffer from deficiencies in programming in CTH and Aftercare are almost all Black and brown youth from under-resourced neighborhoods in NYC and many are in dire need of assistance.

¹ See testimony of The Legal Aid Society submitted for the November 30, 2023 oversight hearing on Alternatives to Detention and Incarceration in NYC, held before the Committee on Criminal Justice, as well as that submitted for the December 14, 2023 oversight hearing on Preventative Services for At-Risk and Justice-Involved Youth, held jointly before the General Welfare and Youth Services Committees.

² The Court of Appeals has recognized that rehabilitation rather than punishment is the overarching legislative goal that animates the statutory scheme regarding juvenile delinquency cases. See Matter of Benjamin L., 92 N.Y.2d 660, 670 (1999) (noting that “rehabilitation of the juvenile through prompt intervention and treatment” is “the central goal of any juvenile proceeding”).

While some clients report positive experiences in CTH, others report a dearth of high-quality services.

Areas in need of improvement for CTH and for those on Aftercare—supervision and support for youth re-entering the community after time spent in a CTH residential facility—include staff turnover and inadequate training and a lack of High School Equivalency (HSE) and job training programs for older teens. ACS, which contracts out the responsibility for running CTH facilities, must be required to ensure that all youth receive the necessary programming and services. We urge the City Council to address these deficiencies so that when placement is deemed necessary by the Family Court, youth are provided with what they need to succeed. And, again, we recommend an expansion of ATP programs so that more youth might remain in the community instead of being placed.

About The Legal Aid Society

Legal Aid’s Juvenile Rights Practice provides comprehensive representation as attorneys for children who appear before the New York City Family Courts in abuse, neglect, juvenile delinquency, and other proceedings affecting children’s rights and welfare. Our staff typically represents approximately 34,000 children each year. Legal Aid has dedicated teams of lawyers, social workers, paralegals and investigators devoted to serving the unique needs of children and youth placed into foster care through New York City’s Family Courts, as well children and youth charged as juvenile delinquents, juvenile offenders and adolescent offenders.

Legal Aid represents the majority of children and youth prosecuted in New York City’s Family Courts and Criminal Courts. The Juvenile Rights Practice and the Criminal Defense Practice’s Adolescent Intervention and Diversion (AID) Unit have adopted an integrated

representation model to ensure seamless and comprehensive representation of 16- and 17-year-old youths who appear in Criminal Court’s Youth Part, most of whose cases are removed to Family Court. In addition to representing our clients in trial and appellate courts, we also pursue impact litigation and other law reform initiatives. To accomplish the most effective law reform, Legal Aid relies on data and uses affirmative litigation and policy advocacy to improve existing laws and policies. Our perspective comes from daily contact with children and their families, and from our interactions with the courts, social service providers, and City and State agencies.

I. NYC’S JUVENILE LEGAL SYSTEM – A BRIEF OVERVIEW

ACS’s Division of Youth and Family Justice (DYFJ) is responsible for the detention of all youth in New York City and for the placement (the Family Court equivalent of sentencing) of youth adjudicated as juvenile delinquents (JDs). Currently, youth between the age of 12³ and 18 can be charged as juvenile delinquents and prosecuted in Family Court. Children ages 13-15 charged with certain serious crimes can be prosecuted as juvenile offenders (JOs) in the Youth Part of Criminal Court. Youth charged with more serious crimes at age 16 or 17 can be prosecuted as adolescent offenders (AOs) in Criminal Court.

If detained, children and youth charged as JDs, JOs, and AOs are remanded to ACS custody. ACS DYFJ operates two secure detention facilities: Crossroads Juvenile Center in Brooklyn and Horizon Juvenile Center in the Bronx.⁴ ACS DYFJ is also responsible for and oversees the “Close to Home” (CTH) placement facilities where youth adjudicated as juvenile delinquents are placed. ACS DYFJ contracts with not-for-profit agencies who operate these congregate residential

³ Although New York raised its minimum age of juvenile delinquency jurisdiction from age 7 to age 12, children as young as 7 years old may still be charged with most homicide offenses.

⁴ JDs can also be detained in a non-secure detention facility run by agencies contracted by ACS.

placement facilities, which include both non-secure placement (NSP) and limited secure placement (LSP). In addition, Alternatives to Placement (ATP) programs are contracted community-based dispositional alternatives with intensive services which can be utilized for an adjudicated JD in lieu of placement in CTH.

Racial Disproportionality Pervades CTH Placement

Appalling and longstanding racial disparities exist in NYC’s juvenile legal system; justice-involved children and teens are almost exclusively poor, and Black or brown. These glaring disparities are found in demographic data regarding CTH. According to ACS’s data for Fiscal Year 2023, of the 71 total Non-secure Placement admissions, 63.4% were African American, 29.6% Hispanic; and of the 11 Limited-secure Placement admissions, 45.5% were African American, 54.5% Hispanic.⁵ These injustices are rooted in racial inequities that permeate the juvenile legal system.

Increased Census at Close to Home

The number of youth in juvenile placement facilities has recently increased dramatically. According to the Preliminary Mayor’s Management Report for Fiscal Year 2024 (PMMR24), the number of young people *entering* Close to Home placement during the first four months of the fiscal year “increased 88 percent from 25 in Fiscal 2023 to 47 in Fiscal 2024, consistent with the increase in detention admissions.”⁶ Moreover, the PMMR24 indicates that “[t]he average number [of youth] in Close to Home placement rose 16 percent from 56.0 from the first four months of Fiscal 2023 to 64.8 during the same period in Fiscal 2024.”⁷

⁵ <https://www.nyc.gov/assets/acs/pdf/data-analysis/2023/NSPLSPDemographicsReportFY23.pdf>

⁶ https://donbuqm3ub5fw.cloudfront.net/files/2024_pmmr_5958988a3f.pdf at p. 209

⁷ *Id.*

Further, the number of young people released from CTH residential care to aftercare decreased by 35 percent “from 23 to 15 [youth] from the first four months of Fiscal 2023 to the first four months of Fiscal 2024.”⁸ According to the PMMR24, this change is the result of more determinations by staff that youth are not ready for aftercare, a determination “which is based on a variety of factors including youth behavior in placement, severity of the charge, and successful participation in community-based activities.”⁹ However, this decline in releases to aftercare may also be the result of failures by CTH programs to provide sufficient support, as outlined below.

II. DEFICIENCIES IN CLOSE TO HOME THAT ARE HARMFUL TO YOUTH

There are several concerns about the adequacy of services and supports for youth in Close to Home and Aftercare. Key concerns include inadequate programming for older youth, including lack of sufficient GED and vocational training; lack of adequate and consistent staff at CTH facilities due to high turnover; lack of adequately trained staff; insufficient communication with youth’s attorneys; inadequate supports in aftercare; inadequate access to interpreters (other than Spanish) for in-person meetings and services with families and/or guardians; and deficient services for “crossover youth” who have cases in both the delinquency and child protective systems.

We urge the City Council to address these deficiencies so that when placement is deemed necessary by the Family Court, youth are provided with what they need to succeed. And, again, we recommend an expansion of ATP programs so that more youth might remain in the community instead of being placed.

⁸ *Id.*

⁹ *Id.*

Provide Appropriate Programming for Older Youth

With the implementation of Raise the Age (RTA) in October 2018 for 16-year-olds, and October 2019 for 17-year-olds, CTH was tasked with serving a population that includes older youth. As a result, CTH facilities have seen an influx of older teenagers, including more 16- and 17-year-old and some 18- and 19-year-old youth. Unfortunately, CTH has not expanded its range of services sufficiently to address the needs of this older population.

Older youth need to focus on skills that will help them function in the job market. Yet there is a paucity of GED programs and job training available for older youth in CTH, with some CTH facilities having no GED or job training programs available at all. Moreover, when a GED or vocational program is available in one facility, but a youth is placed in a different facility, staff report that ACS has refused to transfer the youth to provide access. GED and vocational training services are essential services to ensure youth succeed in the community. ACS must ensure these programs are available to all youth who need them.

Ensure Adequate and Consistent Staffing at CTH Facilities

Although we are unaware of the official turnover rate, we have observed a high turnover of staff at CTH facilities. The turnover of staff contributes to a lack of continuity of services for our clients and a corresponding reduction in the quality of care, as well as inadequately trained staff. As noted in one a recent study, staff turnover can disadvantage youth “in terms of treatment

progress and future success, regardless of their own criminogenic risks and through no fault of their own.”¹⁰

Further, we note at times that it is difficult for Legal Aid attorneys and social workers to reach CTH staff, including clinical staff, and have received reports of failure to notify counsel and social workers so that they can attend transitional meetings. It is critical for our staff to be able to communicate effectively with CTH and clinical staff to ensure effective services for our clients.

Improve Aftercare Supports

After youth complete the residential stay component of CTH, they transition back to the community on “aftercare,” during which time they are supposed to receive supports and supervision for an average of four to six months.¹¹ An ACS Placement and Permanency Specialist (PPS) monitors the youth and is supposed to make sure they receive all needed services, such as family counseling, mental health services, academic support, and vocational assistance. An aftercare service plan is ideally tailored to the youth’s individual needs, however, there is a shortage of comprehensive aftercare planning and services. For example, we have received reports that arranging for services such as therapy have not been adequately addressed on aftercare. There needs to be more support to ensure individual youth are connected to educational, vocational, mental health, and other services in the community so that they can succeed.

¹⁰ See Wolff, K., Limoncelli, K., Baglivio, M. (2020) The Effect of Program Staffing Difficulties on Changes in Dynamic Risk and Reoffending among Juvenile Offenders in Residential Placement, CUNY Academic Works, John John College of Criminal Justice, at 32-33.
https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1481&context=jj_pubs

¹¹ See <https://www.nyc.gov/site/acs/justice/placement-process.page> for ACS’s description of Aftercare.

Many younger teens have been exposed to gang violence in their communities and would greatly benefit from the support and knowledge gained from anti-violence programming. However, younger clients do not routinely receive these types of referrals. Suitable younger clients who are on aftercare should be referred to anti-gun-violence and anti-gang-violence programming by their PPS workers. These programs use a comprehensive model to provide opportunities for youth to engage in pro-social activities as part of violence prevention.

Improve Access to Interpreters For In Person Services

The families and guardians of youth in CTH who are not comfortable speaking English require interpreters to participate in therapeutic and other services for the CTH youth. Our staff report inconsistent access to interpreters for languages other than Spanish, creating barriers to needed services. This may be a facility-specific program; however, attention is needed to ensure consistent access to appropriate interpreters to youth and their families and guardians is needed for in person meetings and services, particularly for family therapy and other essential services.

“Crossover Youth” at CTH: Needs and Time Frames Not Adequately Addressed

A long-standing problem for our “crossover” clients -- those who are in foster care and also have a delinquency matter -- is a failure by ACS to timely and adequately plan for their discharge from CTH facilities. Some crossover youth do not have a home or foster care placement to return to upon discharge. This often results in youth being held at CTH facilities longer than they would have otherwise, had planning begun in a timely fashion and a foster care placement been set up for discharge to aftercare.

This planning problem is rooted in several systemic deficiencies. First, there is a significant lack of coordination between case planners on a youth's delinquency placement and case planners for their child protective (CP) matter. ACS case planners on the youth's CP case often lack understanding of the time frames of CTH, and the need to find a foster placement in time for discharge to the community. In one case, the CP case planner indicated at the time of discharge that the youth was to return to the Children's Center, a pre-placement congregate shelter for children intended to be short term. The Family Court judge rejected this idea, leaving the youth instead held in CTH placement beyond his required time while ACS looked for a foster care placement. This should have been addressed much earlier in the CTH placement so that when the youth was ready to be discharged to the community, a foster placement had already been found, introductions had been made, and service planning and coordination had taken place.

Since youth generally stay in an CTH placement facility for six to eight months, planning should be undertaken early in the CTH placement to ensure release of "crossover youth" to an appropriate and timely foster care placement with needed services identified and in place. This systemic issue must be addressed so that the needs of cross-over youth are consistently met.

More Alternative To Placement Program Slots Would Reduce CTH Placements

The availability of additional slots in Alternative to Placement programs would decrease the number of youth placed into CTH. Unfortunately, the recent closing of the effective Esperanza ATP program in Family Court has been a huge loss for youth. Esperanza provided an intensive, therapeutic, community-based program which also contained a trauma-driven therapeutic component addressing the needs of youth with a trauma history. Further, the contract with its proposed replacement, CASES IMPACT, was reportedly cancelled and no substitute has been

provided. We again urge expansion of ATP programs so that more youth might remain in the community instead of being placed.

CONCLUSION

Thank you for holding this hearing to address these important topics. We look forward to continuing to work with the City Council to improve the quality of services children in the juvenile legal system receive and are happy to answer any questions you have.

Contact:

Lisa Freeman

lafreeman@legal-aid.org



The New York City Council

Oversight: Close to Home

April 24, 2024

Testimony of

Ms. Daphne Torres-Douglas, LCSW-R

Vice President for Behavioral Health Services

Greeting to the Committee and thank you for the opportunity to testify. I am Daphne Torres-Douglas, A Vice President at The Children's Village, Harlem Dowling and Inwood House.

We provide one of the broadest continuums of trauma informed, evidence-based family support interventions. Interventions that focus on family-reunification and keeping at-risk youth safe at home, in school and with the people who love them.

We were an early advocate for Close to Home, and we have remained active in serving teens and families since the legislation was passed. The changes have been dramatic and, for many families, life altering. For many, placement is a result of disconnection from community, family, school, and mental health symptoms from trauma. Close to Home, with its emphasis on therapeutic rather than punitive approaches while in residential and post-placement, has dramatically reduced the lengths of stay in placement and increased successful reunification with family. This requires inclusion of family. The well-being and safety of children, families and communities is at the forefront of all our decisions, just as we make them everyday as parents ourselves. We are determined to see bonds heal among family members, and to use placement as a chance to expose youth to new experiences, activities, and opportunities.

Engagement in Close to Home begins immediately upon entry and follows youth into the community at discharge. When done right, our therapeutic and financial investments in families provide validation, safety and restore humanity. While therapy that focuses on social and emotional development is fundamental to our approach, we also provide financial assistance when finances and poverty present barriers to success. Once discharged, post-placement support for each family is critically important to reduce

recidivism. This support takes the form of rigorous, evidence-based aftercare services, life-coaching and mentoring. This support helps to mitigate the life stressors that weigh heavy on young people and lend extra support to youth who are navigating high school enrollment, college applications and employment searches.

Engaging in “people work” successfully requires a strong workforce that is skilled, invested and committed, and **not distracted by their own poverty**. ACS counselors still earn much more and get better benefits than non-profit staff; impacting the non-profit sector’s ability to hire and retain great employees. New contracts with increased rates will help, yet NYC must invest financially in front line workforce to ensure the ongoing viability of these programs.

We ask that NYC simplify the budget and invoice process to make reimbursement faster and more predictable. Agencies such as ours struggle with millions in outstanding cash flow and spend hundreds of thousands on interest every year due to borrowing to cover delayed payments. Effective residential programming requires capital support for infrastructure maintenance and qualified clinical and direct staff for effective evidence-based treatment. The financial demand to fund innovative, engaging and relevant programming, requires immediate action often with funds not available. Program operation in this manner is not sustainable, not equitable, has many financial disadvantages and risks to programming. Everyone loses, including youth and families.

Demand for Close to Home services is increasing; admissions and census are both up relative to prior years. These are children who otherwise would have been in upstate facilities far from families, or in danger in adult jails. And the evidence shows that this program also works, with the vast majority of youth successfully returning home, rather than escalating deeper into the system. We ask the City to renew and expand its investment in this important and transformational intervention.

Respectfully,



Daphne Torres-Douglas, LCSW-R
Vice President for Behavioral Health Services
The Children’s Village

**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: Jan Hassan-Butera

Address: _____

I represent: SCO Family of 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: 4/24/24

(PLEASE PRINT)

Name: ELISABETH BERNARD

Address: _____

I represent: ADVOCATES FOR CHILDREN

Address: 151 W 30 ST

**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: Nancy Ginsburg

Address: _____

I represent: ACS

Address: _____

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Johan Peguero

Address: _____

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: 4/29/24

(PLEASE PRINT)

Name: Katelyn Greco

Address: _____

I represent: COFCCA

Address: 254 W 31st St

**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: Annie Minguez

Address: _____

I represent: Good Shepherd 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: Dionis Fernandez

Address: _____

I represent: _____

Address: _____

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

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 4/24/2024

(PLEASE PRINT)

Name: Pedro Gonzalez

Address: [redacted] courtlandt Ave

I represent: myself

Address: _____

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