



NEW YORK CITY DEPARTMENT OF
HEALTH AND MENTAL HYGIENE
Alister F. Martin, MD, MPP
Commissioner

Testimony

of

Corinne Schiff
Deputy Commissioner of Environmental Health
New York City Department of Health and Mental Hygiene

before the

New York City Council
Committee on Health,
Committee on Oversight & Investigations, &
Subcommittee on Early Childhood Education

on

Child Care Program Background Checks

April 22, 2026
New York, NY

Good afternoon, Chair Schulman, Chair Krishnan, Chair Gutiérrez, Majority Leader Abreu, and members of the Committees on Health and Oversight & Investigations, and the Subcommittee on Early Childhood Education. I am Corinne Schiff, Deputy Commissioner for Environmental Health at the New York City Health Department. On behalf of Commissioner Martin, thank you for the opportunity to testify today on our work to promote safe, quality child care.

The Health Department is charged with protecting and promoting the health of all New Yorkers. One of our critical responsibilities is oversight of child care programs. The Department regulates child care centers, programs that serve children under age six in stand-alone commercial locations, and school-based child care programs, which serve children ages three to five in a school with upper grades. New York State regulates home-based child care, which serves children six weeks to 12 years old in a residential setting, and school-age child care, which operates in non-residential settings to care for children in school, ages five to 13, after school and during school breaks. The Health Department holds a contract with New York State to conduct some aspects of the licensing and background check processes and to inspect.

Safe, quality child care sets children up for a lifetime of positive health outcomes, and New York City has some of the strongest and most protective health and safety requirements in the country. Mayor Mamdani has been clear that maintaining NYC's high health and safety standards is a key component of the city's universal child care plan.

Every provider who applies to open a child care center in NYC undergoes a rigorous vetting process, and once the program is operating, the Health Department conducts unannounced inspections to promote compliance with health and safety mandates. We make inspection results available on our website, Child Care Connect, and provide recent inspection history and other information on a Performance Summary Card, posted at the program entrance.

The Department's work on background clearances is the subject of today's oversight inquiry and of Introduction 15. Since 2019, the Health Department conducts a comprehensive background clearance for anyone working in a child care program who may have contact with children.

Federal law requires us to process the clearance application within 45 days, and I am pleased to report that after years of extensive backlogs, our median processing time is now below the 45-day mandate. We continue to upgrade our technology to improve efficiency and anticipate further improvements to our turnaround time. Some applications take longer than 45 days, including for reasons outside of the Department's control, such as when we must request clearance information from another state and do not receive a timely response.

Turning to Introduction 15, it would prohibit the Health Department from repeating a background check except where the law requires it. The Department already conducts a renewed background check only when required by law and would like to discuss with Council the concerns this bill aims to address.

Introduction 135 would require the Department to post summary inspection reports on our website within 24 hours, post closure orders at the entrance to the child care program, and provide the closure order to parents or caregivers. The Department already posts summary inspection reports on our Child Care Connect website. Our inspection system uploads these reports overnight, and they appear the next day.

Regarding closure, the vast majority of the city's child care providers offer safe and loving environments for children. There are times, however, when we identify programs operating unsafely. In those cases, we require the program to close, correct the deficiencies, and update their protocols. Only after the program demonstrates to us that it can operate safely, do we authorize reopening.

We know this closure can create a hardship for families, and we do not take this step lightly. As part of the closure process, we require the provider to post the closure order at the program entrance and distribute closure information to families. We would like to work with the Council regarding the best way for the Department to provide closure information directly to families.

Thank you for the opportunity to testify. I am happy to take questions.

Child Care Provider

Apply for a NYC Health Department child care center permit.

Create an Account

Login to your Child Care Provider Dashboard



Information for Providers

Access essential information from the NYC Health Department about health and safety requirements for child care providers.

Information for Providers

Child Care Provider

Businesses

Business

PP Demo Test

Facility

Demo Provider Portal

45, BROADWAY, behind McDonalds., MANHATTAN, 10007

Dashboard

Applications

Permits

Child Care Background Check

PP Demo Test (Demo Provider Portal) > Dashboard

Applications

View All Applications

Action Needed

Group Child Care Permit Application

Please provide additional information in the "Schedule Inspection with a Public Health Sanitarian (PHS)" section. You must complete this task to continue your application. Click on "Update Information" to complete this section.

DCID: DC45430

Permit Type: Preschool

View Details

Update Information

Resources

NYC Health Department Website for Group Child Care Providers

View Details

Comprehensive Background Checks for Group Child Care Programs

View Details

NYC Health Code Article 47

View Details

Contact Information for the Bureau of Child Care Borough Offices

View Details

Child Care Provider

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Dashboard

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Child Care Background
Check

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Chat With Us

Withdraw Application

Application Milestones


Action Needed
Provider Action Needed


Site Viability Inspection
1/3 steps completed

View Details


Upcoming


Architectural Review
0/3 steps completed

View Details


Action Needed
Provider Action Needed

NYC Buildings and Fire Department Approvals
0/2 steps completed

View Details


Action Needed
Step rejected by Case
Worker

Program Details
1/11 steps completed
Last Modified Date:
April 22, 2026

View Details

Child Care Provider

Businesses

Business

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Facility

Demo Provider Portal

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Dashboard

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Child Care Background
Check

Details

Chat With Us

Note

- Confirm your address and schedule your site viability inspection.
- Refer to the [site viability guide](#) for details.



Completed

Confirm Facility Information

View Details



Action Needed

Provider Action Needed

Schedule Inspection with a Public Health Sanitarian (PHS)

Action Currently Due on: Avruham Rudich

Schedule Meeting



Upcoming

Inspection - Site Viability

Inspection Status: Not Yet Scheduled

Inspection Date & Time: NA

Inspector Name: NA



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Business

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Dashboard

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Check

Schedule Inspection with a Public Health Sanitarian (PHS)



Note

Please indicate when you are available for the site viability inspection. Please provide as many options as possible. An inspector will confirm the inspection date.

Select Slot

← Fri, April 24 - Thu, April 30 →

Apr 24 Fri	Apr 27 Mon	Apr 28 Tue	Apr 29 Wed	Apr 30 Thu
AM	AM	AM	AM	AM
PM	PM	PM	PM	PM

Selected Slots

- 27 April 2026, Monday, AM
- 24 April 2026, Friday, PM
- 28 April 2026, Tuesday, PM

Cancel

Submit

View Details

Schedule Meeting

Upload Document



→ Certificate of Occupancy (C of O)

Accepted formats: .pdf, .png, .jpeg, .jpg
Maximum file size limit: 2GB

 Upload Files

→ Letter of No Objection (LNO)

Accepted formats: .pdf, .png, .jpeg, .jpg
Maximum file size limit: 2GB

 Upload Files

→ Temporary Certificate of Occupancy (TCO)

Accepted formats: .pdf, .png, .jpeg, .jpg
Maximum file size limit: 2GB

 Upload Files

Upload Document

Child Care Provider

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Post

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Share

Search this feed...

Filter icon

Refresh icon

Avruham Rudich (Customer)
1h ago

Hello Team, When can I expect the DOB approval?

Like Comment

1 comment · 1 view

Aman Neralwar (Employee)
2 hours ago

Hi Avruham,
The document is under review and a PHS Supervisor should reach out to you shortly.

Like

Write a comment...



Child Care Provider

- Businesses
- Business
- PP Demo Test
- Facility
- Demo Provider Portal**
45, BROADWAY, behind McDonalds.,
MANHATTAN, 10007

- Dashboard
- Applications
- Permits
- Child Care Background Check**

PP Demo Test (Demo Provider Portal) > Background Checks

Child Care Background Check

If you wish to add staff members for your facility please click [here](#). And if you wish to refresh the list from CBC Portal click the button down below.

Fetch Staff List

Filter by DCID

All DCID

BLA # ↑	Staff Name ↑	DCID ↑	Email ↑	Date Of Joining ↑	CBC Status ↑
BLA-0000037085	Aman Neralwar Assistant Teacher	DC45430	aman.neralwar@mtxg.ai	03/01/2026	The application has been assigned for review

Child Care Provider

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Create an Account

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Information for Providers

Access essential information from the NYC Health Department about health and safety requirements for child care providers.

Information for Providers

Oversight Hearing - Child Care Program Background Checks

Committee on Health, Committee on Oversight & Investigations, and the
Subcommittee on Early Childhood Education

Wednesday, April 22, 2026, 1PM

Testimony by Emmy Liss, Executive Director, Mayor's Office of Child Care
and Early Childhood Education

Good afternoon to Chair Gutierrez, Chair Schulman, Chair Krishnan, members of the Committees on Health and Oversight and Investigations and the Subcommittee on Early Childhood Education, and all other Council members. My name is Emmy Liss and I am the Executive Director of the Mayor's Office of Child Care and Early Childhood Education. I am joined today by colleagues from the NYC Health Department. Thank you for giving us the opportunity to testify before you today.

Child care is an essential component of the Mamdani Administration's agenda. We believe that every child under five should have access to free, high-quality care delivered in a range of culturally competent care settings with educators who are properly trained and respected. On just day eight of this administration, the Mayor stood with the Governor as she committed over \$1.2 billion in new funding to expand access to child care. With this new funding, the City is expanding and strengthening the 3-K program to ensure every family has access to an option close to home and we are launching 2-K, the City's first universal child care program for two-year-olds. 2-K will serve about 2,000 children this fall, about 12,000 children in fall 2027, and every two-year-old that wants to participate by the end of the Mayor's first term.

When families entrust their children to the care and supervision of a child care provider, nothing is more important than their health and safety. Parents need the confidence that when their child is in someone else's care, they will be supported, nurtured, and cared for. Every day, the NYC Health Department works tirelessly to ensure that the physical spaces they are cared for in are developmentally appropriate and safe, and to verify that all the staff who engage with children – no matter their role – are properly vetted and background checked.

As we continue to expand access to care in the City, we are committed to doing so in a manner that ensures all programs meet a rigorous and high bar for health and safety. We are also committed to continuously improving our City processes to make it easier for child care providers to open, operate, and sustain their businesses. That's why we launched the Child Care Permitting Portal last month so that providers can now apply for a permit online and easily upload their documents and materials, rather than sending dozens of individual emails or visiting staff in person. In a few moments, I will pass to my colleague Aaron Yarbrough, Chief Digital Strategist in the Mayor's Office of Child Care and Early Childhood Education, to briefly walk through the permitting portal.

When it comes to staff background checks, we will never waiver in our commitment to ensuring that any adult who works in a child care setting is vetted and cleared to be there. At the same time, we recognize that there is always opportunity to strengthen our City processes to ensure they more effectively meet provider need.

The Mayor's Office of Child Care and Early Childhood Education will play an important role as we move forward to ensure that all of the City agencies working in child care are coordinated and

aligned, and that all agencies have the resources they need to meet our Administration's ambitious goals. We already work closely with the Health Department and will continue to do so to ensure they are properly staffed and supported to oversee the health and safety of all our child care programs.

Thank you for the time to testify today. I will now pass it to my colleague Aaron to walk through the permitting portal, and then on to Deputy Commissioner Corinne Schiff who can speak more to the day-to-day details of the Health Department's work and to the Administration's position on the legislation being considered today.



**NEW YORK CITY COUNCIL
JOINT HEARING BY THE COMMITTEE ON HEALTH, THE COMMITTEE ON
OVERSIGHT AND INVESTIGATIONS, AND THE SUBCOMMITTEE ON
EARLY CHILDHOOD EDUCATION**

**WRITTEN TESTIMONY OF NADIA SHIHATA
COMMISSIONER, NEW YORK CITY DEPARTMENT OF INVESTIGATION**

**CONCERNING OVERSIGHT OF THE CHILDCARE
PROGRAM BACKGROUND CHECKS**

WEDNESDAY APRIL 22, 2026

Thank you to Chair Schulman, Chair Krishnan, Chair Gutiérrez, and members of the Committees on Health and Oversight and Investigations, and the Subcommittee on Early Childhood Education for the opportunity to submit testimony about the Department of Investigation's (DOI) limited role in the background check process for certain childcare providers in New York City.

In recognition of the importance of keeping children in childcare in New York City safe, DOI has focused on its operations to be able to process, review, and transmit criminal history results of childcare provider applicants in a timely way to the Department of Mental Health and Hygiene (DOHMH) to meet dual goals of safety and getting these critical workers into child care programs in a timely manner. Federal law requires all staff and volunteers who work in a childcare program to undergo a comprehensive background check (CBC), which includes fingerprinting, every five years.¹ DOI has a discrete role in the background check process related to the processing of criminal history results of childcare provider applicants for non-City funded, non-home based childcare programs.² DOHMH completes all other aspects of the CBC.

In New York, criminal history records are maintained by the Division of Criminal Justice Services (DCJS), which also conducts criminal history record checks.³ Criminal history records are not considered public records. As a result, DCJS provides criminal history records only to designated entities subject to a local, state, or federal law that allows a potential employer or licensing agency to ask a candidate to submit fingerprints to DCJS. The relevant state law for these purposes is New York State Executive Law §837-m, which directs that DOI shall be the New York City department that receives the criminal history records from DCJS for applicants who wish to work in center-based childcare programs in New York City.

To initiate a background check, the center-based childcare program provides the applicant with the necessary forms to complete and directs the applicant to schedule an appointment to get fingerprinted by IDEMIA, the sole-source vendor contracted by DCJS to process fingerprints for criminal history record checks. IDEMIA has multiple fingerprinting facilities across the five boroughs.⁴ The cost of fingerprinting is paid by the applicant.

Once an applicant is fingerprinted by IDEMIA, the fingerprints are transmitted to DCJS, which will conduct a New York State criminal history check, a Federal Bureau of Investigation criminal history check (which also identifies any out-of-state criminal history), and a National Crime and Information Center: National Sex Offender Registry check. DCJS transmits the results of those checks to DOI through the DCJS eJustice portal. The receipt of the results in the portal is what initiates DOI's involvement in DOHMH's background check process for center-based childcare programs.

DOI has a Fingerprint Unit responsible for intaking and processing the results of such criminal history checks and transmitting the results to DOHMH. The staff members in DOI's Fingerprint Unit are trained and certified by DCJS to access the eJustice portal to receive the criminal history results of childcare provider applicants. DOI typically receives between approximately 50-100 notifications of criminal history record results, which include notifications that an applicant has no criminal history, in the eJustice portal each day for childcare provider applicants.

DOI compiles a report in the form of a spreadsheet that lists all applicants whose fingerprint results were provided by DCJS, generally within the prior week, where no criminal history was reported. A report of recently fingerprinted applicants with no criminal history is shared with DOHMH weekly. For the majority of applicants, this means their fingerprint results are processed and submitted to DOHMH within 5-10

¹ See, §658(H) of the Child Care Development Block Grant Act and 45 C.F.R. §98.43. Criminal background checks must also be done for prospective staff members. Childcare staff members are individuals (1) who are employed by a childcare provider for compensation or (2) whose activities involve the care or supervision of children for a childcare provider or unsupervised access to children who are cared for or supervised by a childcare provider. This includes contract employees, self-employed individuals, and all adults (ages 18 and up) residing in a family childcare home.

² New York City Public Schools and the New York State Office of Children and Family Services process the criminal history results of childcare provider applicants in other types of programs.

³ New York State Division of Criminal Justice Services "Requesting Your New York State Criminal History," available at: <https://www.criminaljustice.ny.gov/ojis/recordreview.htm>.

⁴ IdentGO, "Locations," available at <https://www.identgo.com/locations>.

business days. For any applicant where a criminal history is reported by DCJS, the criminal history records are reviewed by Fingerprint Unit staff and attorneys in DOI's General Counsel Unit to assess which criminal history is eligible to be reported to DOHMH under the relevant state and local laws. The timeframe it takes to review applicants with criminal history varies as DOI must often request documentation and updates from out-of-state courts. Once such documentation is received and evaluated, applicants with reportable criminal history are entered on a second spreadsheet that is shared with DOHMH weekly.

Infrequent instances of applicant error when undergoing fingerprinting can result in a delay in DOI reporting the results from a few days up to a few months. However, it is important to note that these reporting issues are the exception, not the rule. At present, DOI has no backlog related to its process. In calendar year 2025, DOI processed and transmitted to DOHMH the criminal history results of more than 13,780 applicants.

In addition to the criminal history results first received by DOI after DCJS has transmitted them to DOI through the eJustice portal, DOI receives arrest notifications for any fingerprinted applicant who is subsequently arrested (even if they no longer work for a childcare provider). DOI provides the arrest notifications to DOHMH as soon as possible after receipt. In the Mayor's Management Report, DOI reported that in each of fiscal years 2022 through 2025, DOI took one day to notify DOHMH of arrest notifications for childcare workers after receipt from DCJS.

Although DOI's role in the center-based childcare background check process is minimal, DOI recognizes the importance of ensuring that individuals hired to care for the City's children at such programs have the requisite qualifications and background to do so. DOI is happy to answer any questions that the Committees and Subcommittee or any Council Members may have about its role in the background checks of childcare providers in New York City. Please reach out to DOI's Director of Intergovernmental Affairs and Special Counsel Rebecca Chasan at rhasan@doi.nyc.gov for further information.

**Testimony of Testimony of Commissioner Samuel A.A. Levine
New York City Department of Consumer and Worker Protection**

**Before the Committee on Health, the Committee on Oversight and Investigations, and the Subcommittee
on Early Childhood Education
Oversight Hearing on Child Care Program Background Checks and Introduction 831**

April 22, 2026

Introduction

Good morning, Chairs Krishnan, Schulman, Gutiérrez and members of the Committees on Health, Oversight and Investigations, and Subcommittee on Early Childhood Education. I am Samuel Levine, Commissioner of the Department of Consumer and Worker Protection (DCWP). Thank you for the opportunity to testify before the Committees today on Introduction 831.

Protecting New Yorkers

The NYC Department of Consumer and Worker Protection (DCWP) is the nation’s leading municipal enforcement agency charged with delivering economic justice. DCWP leverages its authority to bring New Yorkers real economic relief and protect them from predatory, deceptive, and unfair practices that violate their rights as consumers and workers. This includes pioneering cutting-edge protections, such as the City’s Consumer Protection Law, Protected Time Off Law, Fair Workweek Law, and Delivery Worker Laws, including the Minimum Pay Rate for delivery workers. Through licensing more than 45,000 businesses in over 45 industries, DCWP ensures fair competition and a level playing field for responsible small businesses that are integral to New York City’s vibrant communities. DCWP also provides essential services such as free tax preparation and financial counseling to ensure New Yorkers keep more of what they earn and can plan for their futures. DCWP is committed to making sure New York City is a fairer, more affordable place to live.

Protecting New York’s Workers

DCWP enforces key municipal workplace laws that provide workers with greater stability in their schedules, income, and employment. We strive to ensure compliance with these essential workplace laws and secure restitution for workers who have faced violations in the workplace. One of DCWP’s cornerstone workplace laws is New York City’s Protected Time Off Law, formally known as the Earned Safe and Sick Time Act, covering 4.3 million workers across the New York City. Protected Time Off ensures that New Yorkers have the right to take time off work to care for themselves or loved ones, including when they’re sick, need preventive care, or are a survivor of domestic violence or workplace violence. New Yorkers should never have to make a choice between their health and safety, or the health and safety of their loved ones, and their livelihood.

Since the agency began enforcing the law in 2014, we have combined our education and enforcement efforts to bring real results for New Yorkers. We have continuously worked in close partnership with the Council to update the law. Through the passage of Local Law 199 of 2017, we made amendments to add a “safe leave” component to the law, and through the passage of Local Law 97 of 2020, we increased the number of hours for paid protected time off from 40 hours to 56 hours at large employers. In 2022, Local Law 22 of 2022 amended the law to provide employees with a private right of action against their employers for alleged violations. Most recently, in February of this year, we celebrated our implementation of Local Law 145 of 2025, which added 32 hours of unpaid protected time off for each calendar year, more covered reasons to use of protected time off under the law, and alignment of the requirements of the Protected Time Off Law and the Temporary Schedule Change Law.

Introduction 831

Turning to today's legislation, Introduction 831 amends New York City's Earned Safe and Sick Time Act (ESSTA) to require employers to provide up to 5 business days of unpaid leave to donate bone marrow and up to 20 business days of unpaid leave to make a living organ donation, in addition to other leave provided by the employer. It also requires DCWP to establish a program to provide employees with a wage-replacement benefit, at the employee's regular pay rate, to compensate employees for unpaid leave taken for bone marrow donation or living organ donation leave.

DCWP supports the intent of Introduction 831. Employees should be able to take time off if they are donating bone marrow or an organ. In fact, employees already have a right to use leave to recover from a bone marrow or organ donation procedure under the City's Protected Time Off Law. And, certain employees also have a right to unpaid leave and job protection under the federal Family Medical Leave Act. That said, changes to the Protected Time Off Law can go further. DCWP believes that employees should have the flexibility to use their protected time off for whatever reason they need to in order to care for themselves or their loved ones. Creating discrete leave banks for specific issues maintains limitations on what employees can do with time they have rightfully earned to take off. Additionally, creating discrete leave banks on specific issues, besides limiting employees' use of time, may pose operational challenges for small businesses, who ultimately will need to implement systems to account for disparate uses and banks of leave. Ultimately, the Administration supports an approach to protected time off that provides the greatest flexibility for employees on using their protected time off that they have earned, while ensuring the law can be operationalized efficiently by small businesses. There could also be improvements to existing state level leave benefits that could address these medical needs. Lastly, DCWP's preliminary evaluation of the bill anticipates that we will have operational challenges with the implementation of "a wage-replacement benefit".

Conclusion

Thank you for the opportunity to testify before the committees on today's legislation. As always, we are eager to partner with the Council on legislation to improve protections for workers, and prioritize economic justice in our city.



**Testimony of United Neighborhood Houses
Before the New York City Council**

**FY27 Oversight Hearing
Subcommittee on Early Childhood Education
Council Member Jennifer Gutierrez, Chair**

Oversight - Child Care Program Background Checks

**Submitted by Paula Inhargue
April 22, 2026**

Thank you to Chairs Gutierrez, Schulman, and Krishnan and members of the New York City Council for the opportunity to testify on this important issue. United Neighborhood Houses UNH. UNH is a policy and social change organization representing 45 neighborhood settlement houses, 40 in New York City, that reach 765,000 New Yorkers from all walks of life.

UNH is a policy and social change organization representing neighborhood settlement houses that reach over 840,000 New Yorkers from all walks of life. A progressive leader for more than 100 years, UNH is stewarding a new era for New York's settlement house movement. We mobilize our members and their communities to advocate for good public policies and promote strong organizations and practices that keep neighborhoods resilient and thriving for all New Yorkers. UNH leads advocacy and partners with our members on a broad range of issues including civic and community engagement, neighborhood affordability, healthy aging, early childhood education, adult literacy, and youth development. We also provide customized professional development and peer learning to build the skills and leadership capabilities of settlement house staff at all levels.

Settlement houses operate a wide variety of child care and youth programs, all of which require background checks for staff and volunteers to be able to work in those programs. Background checks are a necessary component of all programs, and play a vital role in the hiring process. Settlement houses support having them in place, and they rely on their partners in government to process those checks efficiently. However, due to changes at the federal level, New York State had to overhaul how it administered background checks for child care and youth staff in 2019. This change, which New York State and City were largely unprepared for, caused serious delays in staff clearances and hiring, delays which the system is still recovering from to this day. This testimony discusses these challenges and shares recommendations for improving the system moving forward.

Background

Since September 25th, 2019, New York State Office of Children and Family Services (OCFS) has required NYC DOHMH to perform Comprehensive Background Checks (CBC), new extensive background checks for staff and volunteers in after-school and early childhood education that are listed below:

- A NYS criminal history record check with the Division of Criminal Justice Services; (new)
- A national criminal record check with the Federal Bureau of Investigation; (new)
- A search of the NYS sex offender registry; (new)
- A database check of the NYS Statewide Central Register of Child Abuse and Maltreatment (SCR) in accordance with 424-1 of the Social Services Law;
- A search of the national sex offender registry using the National Crime and Information Center ***Required at a later time (new)

If the individual being cleared has lived outside of New York State in the last five years, they will also have to undergo background checks in every other State where they have lived. This includes:

- Each state(s) criminal history repository;
- Each state's sex offender registry or repository;
- Each state's child abuse or neglect registry.

When this new CBC process was rolled out in fall 2019, DOHMH was not able to complete the background checks in a timely manner. The new packets that staff had to complete were long, and had to be emailed to a DOHMH email account for processing. The volume of staff that needed to be cleared was significant; there are thousands of people working and volunteering in child care and youth programs in New York City, and this was implemented at the start of the school year when organizations are still hiring and onboarding staff. We suspect that the volume of packets submitted was too high for DOHMH to handle, leading to packets getting lost and an inability of DOHMH to work with providers to understand the new system, correct technical errors, etc.

At the time, many prospective staff members in after-school and early childhood education programs were unable to work due to pending clearances. On February 7, 2020, the backlog led the New York State Office of Children and Family Services to provide some relief through a temporary rule change that allows staff members to work provisionally if they have been cleared through the State Central Register of Child Abuse and Maltreatment (SCR) and if they are supervised for 100% of the time that they are in contact with children by a staff member who has been cleared. This measure did help significantly, even though it was a temporary fix and not the best practice for running a program.

Shortly after this change, the COVID-19 pandemic began. Even though many programs were not operating at all, or were operating remotely, the process for clearing staff was not improved during this time and clearance delays were still significant throughout the COVID-19 pandemic. Furthermore, vacancies at City agencies over the past few years have fueled these delays and extended the time that it took DOHMH to implement an online, automated process. This online process was finally rolled out almost four years after the CBC process was first implemented.

It is difficult to quantify precisely the impact of the Comprehensive Background Check backlog, as data about the issue has been difficult to come by and hiring situations at provider organizations can be fluid. Below is a list of some of the impacts of the delays that we have heard from settlement houses over the last several years:

- Long wait times for prospective staff to get cleared, leading them to take jobs in other industries rather than wait for their clearances to come through;
- Hiring challenges because of these long clearance wait times, causing providers to close programs or open at a reduced capacity. This ultimately caused challenges for parents who could not find reliable child care;
- Complicated and confusing forms for the CBC process, causing human resources/compliance staff at settlement houses to spend significant amounts of time helping prospective and current staff complete forms, and following up with DOHMH to understand where these staff are in the clearance process; and
- Penalties for providers who do not have cleared staff on site. Providers have reported being penalized by DOHMH staff during inspections, even when they show their paper trail of clearance submissions and follow up to DOHMH. This is particularly frustrating because it's the same City agency carrying out the inspections and managing the background check process, but providers are paying the price for DOHMH delays.

Current Process

On May 14, 2023, DOHMH launched a new online, automated process for clearing staff. Since its rollout, the system has generally improved, and feedback has been mostly positive. While we do not have clear insight into whether DOHMH is consistently meeting the federally required 45-day timeline for processing clearances, providers have reported that delays do not appear to be as severe as they were under the previous system. That said, lags still occur.

It is important to note that while many staff are able to receive provisional clearance relatively quickly and begin working, obtaining full clearance continues to take significantly longer. This creates ongoing challenges for staffing, as programs must operate with uncertainty while employees await final approval and must ensure that staff are working under the supervision of a fully cleared staff member at all times.

Additionally, providers have raised concerns about the timeliness of out-of-state background checks, which tend to take considerably longer to process than those conducted on staff who have not previously resided outside of New York State. These delays can further extend the timeline for full clearance and exacerbate staffing difficulties.

In light of these challenges, UNH recommends that DOHMH's Bureau of Child Care be given **adequate staff resources to ensure that background checks are able to be completed in an efficient manner**. This will be particularly important as the City prepares to both significantly expand its early childhood education system, and as the Department of Youth and Community Development plans to issue new awards for the City's afterschool system. Any new providers will need to obtain new School Aged Child Care (SACC) licenses, and will need to get new staff cleared to be able to work in programs. This is a significant shift, and without the proper staffing resources at DOHMH, we fear delays could become an issue. We also recommend that our partners in the City work with the provider community to ensure proper practices and resources

from NYS OCFS and the federal government when necessary to ensure quick processing of checks.

Intro 15

United Neighborhood Houses supports the spirit and intent of Intro 15, as long as the bill complies with state and federal regulations around background checks. Additionally, employers should be able to reserve the right to ask any new staff member to obtain a background check, even if that staff member was cleared by DOHMH within the last five years. If it is the organization's best practice to obtain checks on all new hires, they should be able to do so if they wish.

Thank you for your time. If you have any follow up questions, I can be reached at pinhargue@unhny.org.



**Testimony of Day Care Council of New York
Before the New York City Council Subcommittee on Early Childhood Education
Honorable Jennifer Gutiérrez, Chair
And the Committee on Health
Honorable Lynn Schulman, Chair
At the Oversight Hearing on Comprehensive Background Checks**

**Prepared by Gregory Brender, Chief Policy Officer and
Shelby Lohr, Senior Policy Analyst**

April 22, 2026

Thank you, Chair Gutiérrez and Chair Schulman, for the opportunity to testify about the Comprehensive Background Check (CBC) system in New York City. We are grateful to the City Council and to the Administration for their work to improve systems to support Comprehensive Background Checks. Background clearances are an essential part of the City, State and Federal government's role in supporting child care providers' ability to provide safe and quality services for New York City families. Having efficient systems in place to ensure existing and new staff members can be quickly cleared is an important part of sustaining child care programs and expanding access to child care.

The Day Care Council of New York (DCCNY) is the membership organization of center-based early care and education providers across New York City. DCCNY envisions a future in which all children have access to high-quality early childhood education and where providers and their workforce have the tools and resources needed to deliver it.

DCCNY supports its members and the broader early childhood field through policy research and advocacy, labor relations and mediation, workforce training and professional development, and referral services for families seeking child care. Our member organizations operate more than 300 sites across all five boroughs.

Most DCCNY member organizations contract with the New York City Public Schools (NYCPS), while others rely on child care vouchers issued by ACS and HRA, federally funded Head Start contracts, or private funding. Collectively, DCCNY member

organizations employ over 4,000 New Yorkers – predominantly Black and Brown women - and have the capacity to serve more than 13,000 children and their families citywide.

Early Childhood Education Expansion

DCCNY has long advocated for universal access to high-quality early childhood education. We are excited that our member organizations will be part of the growth and expansion of early childhood education proposed in both Mayor Mamdani's and Governor Hochul's budget proposals.

However, these investments will only succeed if early childhood providers and the workforce have the infrastructure needed to operate sustainably. DCCNY looks forward to working with the administration and City Council to ensure that these expansions create stability for early childhood education provider organizations and fair compensation for the early childhood workforce, which has been undervalued for too long.

DCCNY projects that to have a truly universal child care system in New York City that serves children from birth to five in licensed child care settings, child care providers would need at least 30,000 additional child care workers.¹

With approximately 36,000 New Yorkers currently working in child care, this means doubling the system. Based on average turnover rates in early childhood classrooms, the city will need an average of nearly 5,000 new early educators every year.²

With all new staff needing to be cleared through Comprehensive Background Checks, now is the moment to improve systems to ensure that Comprehensive Background Checks can be conducted quickly and efficiently.

The Staffing Crisis in Child Care Centers

New York City's child care programs face a staffing crisis. While low pay remains the primary driver, delays in the Comprehensive Background Check process contribute to the challenges that providers face.

DCCNY members have reported prospective staff members taking different jobs while waiting for their background checks to clear. In 2023, DCCNY conducted a survey of more than 250 childcare centers in New York City. 83% reported dealing with staff

¹ Day Care Council of New York. *Building a Stronger Child Care Workforce for New York City*. <https://www.dccnyinc.org/wp-content/uploads/2025/12/Workforce-Report-7sm.pdf>, December 2025

² Day Care Council of New York. *Building a Stronger Child Care Workforce for New York City*. <https://www.dccnyinc.org/wp-content/uploads/2025/12/Workforce-Report-7sm.pdf>, December 2025

vacancies and nearly a quarter of those centers dealt with seven or more vacancies at their site.³

This staffing crisis significantly impacts the availability of child care. Several centers operating with DOE contracts currently have fewer classrooms than authorized in their contract budgets. This shortage is not due to a lack of need in their neighborhoods, but rather due to centers' chronic staffing challenges. A statewide survey conducted this March by the Empire State Campaign for Child Care and Schuyler Center for Analysis and Advocacy uncovered that 776 classrooms in community-based organizations statewide closed due to understaffing.⁴

Actions to improve the CBC system must ensure that clearances do not become an impediment to keeping child care centers open or expanding access to child care.

Comprehensive Background Checks

New York City implemented its Comprehensive Background Check (CBC) system on September 25, 2019, in response to changes from the 2014 reauthorization of the Federal Child Care Community Development Block Grant (CCDBG). Under CBC, NYC DOHMH conducts the following checks on all staff and volunteers in child care centers:

- NYS Criminal History Check with NYS Division of Criminal Justice Services
- A national criminal record check with the Federal Bureau of Investigation
- A check of the NYS sex offender registry
- A check of the NYS Statewide Central Register of Child Care and Maltreatment

If the individual has lived outside of New York State, DOHMH conducts additional checks with the criminal history repository, the sex offender registry, and the child abuse and maltreatment registry of every state or territory in which the applicant has lived.

The initial implementation of Comprehensive Background Checks caused the temporary closure of many child care and after-school programs. Programs that were awaiting approvals of new or existing staff members simply did not have the staff to keep their programs open.

In response to the slow rollout of CBC in NYC and other parts of NYS, the NYS Office of Children and Family Services (OCFS) issued new rules on February 7, 2020, allowing staff or volunteers to start working under provisional clearances if they: submitted their

³ New York City Council Black, Latino and Asian Caucus and Day Care Council of New York. The Enduring Value of the Early Childhood Workforce: Why New York City Must Complete the Path to Parity for the Community-Based Early Childhood Education Workforce. September 2023. <https://www.dccnyinc.org/our-work/public-policy/publications/>

⁴ Empire State Campaign for Child Care and Schuyler Center for Analysis and Advocacy. Staffing Shortages Due to Low Wages are Driving the Child Care Crisis in New York. March 2023. <https://www.empirestatechildcare.org/staffing-shortages-and-the-child-care-crisis.html>

CBC background, passed the initial review, and were supervised 100% of the time they have access to children.

This change enabled child care centers to re-open their doors by bringing staff on board quickly. However, this was intended as a stopgap measure, not as an ongoing solution.

Child care providers continue to report:

- Clearance wait times of 3-6 months for hiring staff
- Losing prospective staff members while they wait for the clearances
- Having a significant number of staff members working under provisional clearances. This creates obstacles in staffing, since a small number of fully-cleared staff members must supervise all other staff members at all times.

Recommendations

In order to improve the CBC system, DCCNY makes the following recommendations:

Work with NYS to Allow Portable Background Checks

The Comprehensive Background Check system is intended to ensure the safety of child care and other programs serving children. Passage of a Comprehensive Background Check does not guarantee employment in any program. Furthermore, the checks are the same for all types of programs regardless of the type of program or the age of children served.

However, the current background check system requires every worker to be cleared specifically for the location where they work. If a worker changes locations or changes employers, they must undergo the same background check again, potentially waiting months to start working at the same location.

With programs looking to open new programs to meet the need for 2-K and 3-K, it is important that staff be able to transfer quickly. **DCCNY urges NYC to work with NYS to allow portable background checks.**

Ensure Adequate Staffing in DOHMH to Process Background Checks

The Comprehensive Background Check process requires significant resources from the New York City Department of Health and Mental Hygiene (DOHMH) and other agencies within city, state, and federal government.

As of March 2025, there are 652 vacant positions in DOHMH, representing more than 10% of agency positions.⁵ **DCCNY urges the City to strengthen DOHMH's staffing capacity in the Bureau of Child Care to expedite background check processing, reducing backlogs and improving turnaround times.**

Facilitate Data Sharing and cooperation with DOE PETS system

NYCPS utilizes the Personnel Employee Tracking System (PETS) system for all staff and volunteers working in public schools as well as in community-based organizations working with NYCPS contracts.

Like Comprehensive Background Checks, PETS clearances include:

- NYS Criminal History Check with NYS Division of Criminal Justice Services
- A national criminal record check with the Federal Bureau of Investigation
- A check of the NYS sex offender registry
- A check of the NYS Statewide Central Register of Child Care and Maltreatment

The PETS system includes a search for criminal convictions and pending actions, with continuous updates on NYS arrest records. The clearance process includes an investigation and background questionnaire. The PETS system also verifies work history and military services.

DCCNY members and other providers have reported that PETS clearances typically operate more quickly than Comprehensive Background Checks. In order to leverage the work already being done by NYCPS for many child care providers, **DCCNY urges New York City to develop mechanisms for data sharing, with the consent of the candidate, that will allow information discovered by the PETS system to be used in a Comprehensive Background Check.**

Conduct meetings between DOHMH and providers to identify challenges and solutions to the process

DCCNY appreciated that DOHMH's collaboration and support in working with providers who are understaffed, due in part to delays in the Comprehensive Background Check process. **DCCNY urges the City to develop a formal process for recurring meetings between DOHMH and providers to surface implementation challenges and co-create practical solutions to improve the application process.**

⁵ Council of the City of New York: Civil Service and Labor Committee Staff. *Briefing Paper of the Legislative Division*. April 14, 2026. <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=7953791&GUID=1A8F0048-A44A-483D-9C91-80F0E659C0EC&Options=&Search=>

Develop procedures for DOHMH to proactively reach out to providers when there are paperwork issues with an application.

Providers often do not know why there may be issues clearing an employee or a potential employee. While confidentiality must be maintained, DOHMH should inform providers when paperwork issues are holding up a clearance so that they can work with the employee or potential employee to address the issues.

DCCNY urges NYC to develop and implement procedures requiring DOHMH to proactively reach out to providers when application paperwork issues arise, with clear guidance on communication methods, response timelines, and follow-up protocols to prevent delays.

Thank you for the opportunity to testify. If you have any questions, please feel free to reach out to us at gbrender@dccnyinc.org or slohr@dccnyinc.org.

Good day,

My name is Kathia Piliier, I am the Family Childcare Network Director for Nuestros Niños Childcare Development Center. Located in the heart of Williamsburg since 1973, we understand the importance of running a high quality educational and safe program. Our organization has three centers in Williamsburg and a Family Childcare Network of forty-five providers throughout Brooklyn and Queens. We are devoted to ensuring that programs run smoothly, however we are required to use systems that are developed with the intention to make programs safe but are not reliable.

I am testifying to share my experience on the different challenges that our organization faces relating to navigating the background check process required to work in the early childcare sector (both centerbase and Family Childcare Network). While the intention of creating systems that are necessary to ensure that our children are safe. There are many obstacles that occur during this process. The current systems in place are deeply unreliable and unstable and create unnecessary barriers for qualified individuals who are eager to support young children.

From the start, the process is confusing and fragmented. From a center based perspective, admin support is required to navigate applicants' information through use of multiple systems such as PETS, SCR and CBC that do not communicate with one another. Each platform has its own requirements, login credentials, and instructions, many of which are unclear and are not streamlined. In many cases is a maze with unclear instructions of which process should be started first. The guides that are provided are also unclear. Applicants on the other hand do not receive the required instructions of what needs to be completed in a timely manner. Both applicants and providers are playing an ambiguous role which causes delays of clearances. Some examples are; fingerprints are allegedly not received after applicants have taken their fingerprints and activated their accounts. Documents are submitted and not reviewed until weeks after. If there are mistakes, these corrections are not notified at one time, numerous emails are sent to be corrected in less than a week causing more delays. Lastly, conversations are started with a specific agent and then it is changed to a different agent where the process is delayed because you have to submit documentation again.

As for Family Childcare Providers, they have limited access to the two main systems they are required to use (FAMS and SCR). The FAMS system where providers have to submit all documentation relating to their program such as the 6000 packet that supports their license, and all the individuals that work in their program. This system is fragmented and unstable and does not store or save documents that are required to be submitted in this portal. As for the SCR system, it is important for providers to have access to this system in order to submit clearances for potential staff and they do not. Providers have no guidance on how to create an account, let alone how to use this system causing delays in staffing programs and violations given that are not our fault.

Delays in clearances are one of the most significant challenges. What should take days or weeks often stretches into months, leaving applicants in limbo. During this time, childcare

centers and Family Childcare programs are short-staffed, classrooms are impacted, leading children to ultimately bear the consequences of programs not accessible. These delays are not due to a lack of willingness from applicants, but rather inefficiencies in the systems themselves.

It is extremely difficult to get updates on application status causing delays on the process and program providers or organizations having to pay often for SCR clearance or fingerprints, contributing to an already limited non-existing budget. Leading to triggering to start the process again. Trying to communicate via emails, or phone leads unanswered or provide no meaningful information. In many cases, applicants are simply told their application is "pending" without any explanation of what is missing or how to resolve it.

This has become an overwhelming experience with no clear points of contact, no step-by-step guidance, and no accountability when things go wrong.

These systemic issues not only discourage qualified educators from entering or staying in the field, but they also worsen the ongoing staffing shortages in early childcare setting.

I urge policy makers to support developing a user-friendly centralized system that offers clear communication, timely processing, and accessible support.

April 22, 2026

New York City Council
Subcommittee on Early Childhood Education
250 Broadway – 8th Floor – Hearing Room 1
New York, NY 10007

New York City Council Subcommittee on Early Childhood Education Hearing, Jointly with the Committee on Health and the Committee on Oversight & Investigations: Child Care Program Background Checks

Dear Chair Gutiérrez, Chair Schulman, Chair Krishnan and Members of the Council,

Thank you for holding this important hearing, and for your commitment to ensuring access to high-quality early care and education for our youngest learners and supportive workplaces for our dedicated educators and staff. The Early Care and Education Consortium (ECEC) is a national nonprofit comprised of the leading high-quality multi-site child care providers, state child care associations and education service providers. Collectively, our members operate 7,500 child care centers nationwide, serving over one million children each day. In New York State, our members operate 256 centers, including 86 in New York City employing 1,989 educators and staff, and with the capacity to serve 8,527 children, 27% of whom receive City or State subsidies. Additionally, 37 of our New York City centers currently participate in the City’s Universal Pre-K program, serving about 2,200 children in 3-K and 4-K. We look forward to increasing these partnerships through the Mayor’s ongoing expansion.

Support for Int. 15, “Background checks for child care providers, employees, and volunteers”

I wanted to start off by thanking Majority Leader Abreu for reintroducing Int. 15, along with several other proposals aimed at addressing the longstanding comprehensive background check (CBC) backlog and introducing efficiencies in to the Department of Health and Mental Hygiene’s (DOHMH) clearance system. Int. 15 would address a critical inefficiency in the system—the lack of portability. In effect, this bill would allow a teacher to move across the hall to another classroom, or across the city to another center, without being required to go through the background check process again, so long as that staff member has been cleared by the city within the past five years, as is permitted in most other jurisdictions across the country.

I also want to recognize and thank DOHMH for the *significant* improvements it has made over the past several years, including around portability. However, DOHMH’s current policy remains limited to certain employees, and does not extend to group teachers or education directors. Further, while cleared assistant and substitute teachers are permitted to move between programs much more easily, if they did not list each Day Care ID (DCID) on their CBC application, they must submit an additional application listing all other locations, which can take a substantial amount of time to process.

The impact of this is that if a provider opens a *new* program in New York City, then for that program to be able to have their current teachers move between locations, they would need to have each of them submit a new application. Further, because a group teacher can only work at one child care program and cannot hold the role of group teacher for a former site, they would be unable to transfer easily to the new program.

Beyond opening a new center, these limitations cause challenges in emergency situations. For example, an ECEC member center experienced a water main break early one morning and had to transition children to a different site in the City. They were able to move children between centers, but they were not able to move their staff without working through an updated clearance process with DOHMH. Without the staff being able to transition in a timely manner, they faced challenges maintaining in ratio. Similarly, if a teacher calls out sick early one morning, or has to leave mid-day due to illness or a family emergency, a provider may be limited in bringing in staff from their other centers across the city if they did not list the applicable center's DCID on their initial CBC application.

Int. 15 would ease these challenges significantly by allowing any cleared staff member to remain cleared at all DOHMH licensed locations—allowing the clearance to follow the staff member as opposed to the classroom or facility.

Ongoing Background Check Processing Delays

In addition to the challenges caused by a lack of portability, child care, before- and after-school, and summer program providers have long experienced significant delays in the time it takes DOHMH to process CBCs for educators and staff in New York City—far beyond those faced in other states and even across the rest of New York State. I again want to commend DOHMH and City Hall for their continued efforts to address these delays, their willingness to hear from and work with our providers on these challenges, and the substantial improvements that have been made in recent years.

With that said, in a recent survey of ECEC members, we found that of nearly 300 CBCs that were initiated in the last year, **only about 57% were cleared within the federally mandated 45 days**. About **41% took between 45 days and six months**, and the remaining clearances took longer than six months.

Background checks play a critical role in assuring parents that their children will be safely cared for, and importantly, a teacher cannot supervise a classroom until they receive a clearance (or renewal) from DOHMH. While we are in very strong support of thorough background checks, the length of time clearances are taking undermines providers' ability to provide New York City's children with care and quality educational programming, and is significantly worsening the ongoing staffing crisis. In order to meet the city's commitment to expanding access to child care and Pre-K, we must ensure we are building a qualified workforce and have a consistent pipeline of educators to staff these programs.

The delays cause would-be educators to leave the sector, and result in classroom closures and shortening of programs' operational hours, which impacts working parents' ability to find and access care. As the Mayor and City Council have recognized through their historic focus on and investments in early childhood education, the child care workforce crisis only compounds existing workforce crises across sectors. We need to do more to support working families and early childhood educators, and in conjunction with other policies championed by the Council and the Administration, efforts to reduce the CBC backlog and ensure DOHMH has the staff, technology, and processes in place to maintain an efficient and effective background check processing system would do just that.

New York City can and should be a leader in this space with an efficient system that ensures properly screened staff in a timely manner. We again want to thank the Council for their focus on this important issue, and Majority Leader Abreu for his leadership on this issue. We encourage all members of this body to support Int. 15 so the focus of child care providers can be entirely on the children they serve and their development, rather than on tracking down paperwork.

Thank you for the opportunity to testify at this afternoon's hearing. ECEC stands ready to work with City Council to develop and enact policies to help ensure our youngest learners have the support they need to thrive, and our educators are well-qualified, compensated, and committed to provide the best care and education to children across the City.

Respectfully,

Sage Schafel
Assistant Executive Director
Early Care and Education Consortium

To: New York City Council, Committee on Health

Chair: Lynn Shulman

From: Janelle Melohn, NATRC Senior Director

Stacey Wiggall, NATRC Director of Training & Technical Assistance

Re: New York City Trauma Recovery Centers (TRCs)

Date: Wednesday, April 22, 2026

Good Afternoon Chair and Members of the Committee,

Thank you for the opportunity to submit testimony in support of renewing funding for New York City's Trauma Recovery Centers (TRCs). As of 2026, there are 56 TRCs across 18 states, working together through the National Alliance of Trauma Recovery Centers (NATRC) to advance equitable, evidence-based services for survivors of violence.

We are here today to speak about the four Trauma Recovery Centers in New York City, established in partnership with the City Council.

Since 2023, the Council has funded four TRCs as part of a citywide initiative to expand access to trauma-focused mental health care, support survivors of violence, and improve public safety. Without renewed investment, these centers will be forced to close at the end of the current fiscal year. This would mean that survivors of violence across New York City—particularly those in the most under-resourced communities—will lose access to critical services that support stabilization, recovery, and long-term healing. This risk is especially acute in the current climate of reduced federal funding for essential programs and services.

New York City's TRCs implement the evidence-based model developed at the University of California, San Francisco. These centers serve survivors of a wide range of violent and traumatic experiences, including gun violence, domestic violence, physical and sexual assault, human trafficking, serious motor vehicle incidents, and traumatic grief following homicide.

TRCs are specifically designed to reach survivors who are least likely to access traditional systems of care. Through assertive outreach and community-based service delivery, they

work to eliminate barriers such as cost, transportation, and distrust of institutions. Data from New York State TRCs in 2024 (3 in NYC, 1 in Buffalo) demonstrate that these programs are successfully reaching those most in need: 81% of participants were people of color, 48% were Black or African American, 58% were unemployed, and 37% lacked stable housing.

Through multidisciplinary teams, TRCs provide comprehensive, wraparound services that address both immediate safety needs and longer-term mental health recovery. This integrated approach produces measurable outcomes. Among those served, 70% experienced a reduction in PTSD symptoms, 50% saw a reduction in depression, and 67% reported an improved quality of life.

Decades of research show that survivors of violence face elevated risks of PTSD, depression, substance use disorders, and chronic health conditions, as well as economic instability, including job loss, food insecurity, and housing instability. Without timely and effective intervention, trauma can initiate a cascade of long-term negative outcomes—for individuals, families, and communities.

Trauma Recovery Centers interrupt this trajectory. By providing timely, evidence-based care and practical support, they help survivors stabilize, heal, and regain control of their lives. In doing so, TRCs represent not only a public health intervention, but also a strategic investment in violence prevention and community safety.

We respectfully urge the Committee to prioritize continued funding for New York City's Trauma Recovery Centers. Sustaining these programs is essential to ensuring that all New Yorkers who experience violence have access to the care and support they need to recover and thrive.

Thank you for your consideration.



New York City Council
Subcommittee on Early Childhood Education, Committee on Health, and Committee on
Oversight & Investigations
Joint Oversight Hearing on Child Care Program Background Checks
Testimony Submitted by Margot Sigmone, Vice President of Early Childhood

April 24, 2026

On behalf of Children's Aid, thank you to Chair Gutiérrez, Chair Schulman, Chair Krishnan, and members of the committees for the opportunity to submit testimony on child care program background checks. We appreciate the New York City Council's leadership on issues that deeply impact human service organizations, the early childhood workforce, and families across New York City.

For over 170 years, Children's Aid has committed to ensuring that there are no boundaries to the aspirations of young people, and no limits to their potential. By offering a continuum of services throughout childhood, Children's Aid prepares young people to succeed at every level of education and every milestone of life. Today, nearly 2,000 dedicated full and part time staff members serve nearly 50,000 children, youth, and families across more than 40 sites in New York City. In addition to direct service delivery, we engage in policy and advocacy at all levels of government, with priorities informed by proven strategies that support children and families and the persistent barriers our staff confront while serving these communities every day.

As part of our work, our Early Childhood Division serves nearly 700 of our youngest learners across nine sites in Harlem, Washington Heights, the South Bronx, and Staten Island. We operate programs in a range of modalities, including standalone centers, programs embedded within community schools, and home-based settings, to ensure families can access care in the settings that best meet their needs.

Children's Aid has been navigating the City's Comprehensive Background Check (CBC) process for Group Child Care programs since its implementation in 2019. While we strongly support comprehensive background checks as an essential safeguard for children's safety and well-being, the current CBC process has contributed to significant hiring delays that undermine the stability and capacity of early childhood programs.

On average, candidates wait four to ten weeks for background check clearance, with some cases taking even longer. These extended timelines create untenable financial situations for prospective staff who are unable to begin work while awaiting approval and make it increasingly difficult for providers to fully staff programs. On multiple occasions, Children's Aid has lost qualified candidates who ultimately accepted other employment rather than remain in prolonged limbo without pay. In a sector that is already underfunded and unable to compete with broader labor market wages, prolonged background check timelines have far-reaching consequences for providers, staff, and the families they serve.

Importantly, these delays are not merely operational. Lengthy background check processing limits providers' ability to fully utilize available funding, maintain regulatory compliance, and deliver consistent services to children and families. Staffing shortages can force programs to merge classrooms, delay openings, or operate below capacity—disruptions that are felt most acutely by working families who rely on stable child care, as well as the early childhood workforce, which is largely composed of women of color.

At a high level, Children's Aid supports the following efforts to address these challenges:

1. Reducing duplicative requirements, including eliminating the need for new background checks when staff transfer between sites under the same provider, as proposed in **Int 0015-2026**
2. Supporting increased transparency and communication with families regarding inspections and closures, as proposed in **Int 0135-2026**
3. Developing a transparent, user-friendly application portal that allows applicants and providers to track CBC status in real time
4. Ensuring the Department of Health and Mental Hygiene (DOHMH) and other relevant agencies have sufficient staffing and resources to process background checks in a timely manner
5. Streamlining clearances across DOHMH's CBC system and New York City Public Schools' Personnel Eligibility Tracking System (PETS)
6. Establishing a clear and enforceable maximum processing timeline for background checks

I. Challenges with the Comprehensive Background Check (CBC) Process

Children's Aid's early childhood programs are supported either directly through Head Start (HS) or Early Head Start (EHS) contracts, or through HS or EHS contracts passed through NYCPS. As a result, we must comply with all DOHMH regulations governing child care providers as well as any Head Start requirements that are more stringent than those imposed by the City. For staff working at NYCPS sites, we must also obtain clearances through the NYCPS PETS process.

Currently, the greatest challenge in our hiring process is navigating DOHMH's lengthy background check approval process. Once a candidate is selected, we support them in completing fingerprinting and submitting four separate forms, including one that requires listing every address held over the past 28 years. While we work diligently to compile and submit required materials as quickly as possible, clearance decisions often take several weeks and can extend into several months. Even minor errors or omissions in a single form can place applications on hold, compounding delays.

Although the City allows new staff or volunteers to begin working under line-of-sight supervision while awaiting clearance, this flexibility does not apply to our programs because federal Head Start regulations prohibit staff from working prior to full background check approval. As a result, Children's Aid and similar HS and EHS providers in the city face stricter constraints than some other child care providers, further exacerbating staffing challenges.

The uncertainty created by these delays is made worse by a lack of transparency throughout the CBC process. All communication from DOHMH occurs via email, and there is no accessible portal where applicants or providers can track application status and anticipate decision timelines. Without visibility into where applications stand, providers are unable to plan effectively for staffing needs, and candidates are left without clarity, leading some to withdraw from the process altogether.

When positions remain unfilled for extended periods, programs are forced to operate below capacity, merge classrooms, or delay openings altogether. These disruptions fall most heavily on community-based providers serving predominantly low-income communities, where families rely on stable child care in order to work. When care is interrupted, families may have no choice but to seek temporary alternatives or miss work entirely, putting their financial stability at risk. At the same time, prolonged hiring delays disproportionately harm the early childhood workforce—comprised largely of women of color—and exacerbate financial insecurity in a field that is already underpaid and undervalued.

In addition to challenges in hiring new staff, the current background check requirements also make it difficult to transfer staff between sites. Because background checks are conducted on a per-site basis, any site transfer requires a new background check submission, creating additional barriers to addressing emergent staffing challenges.

II. Feedback on Proposed Legislation

Int 0015-2026: Background checks for child care providers, employees, and volunteers.

The current requirement that staff obtain a new background check clearance each time they transfer between sites creates significant challenges for providers seeking to respond to emergent staffing needs while maintaining safety standards. This legislation would help alleviate this burden by preventing DOHMH from requiring subsequent background checks for staff who have already completed one within the past five years and have remained continuously employed by a child care provider. While we believe this proposal has strong potential to streamline hiring and staffing processes, we urge that any modifications to the CBC system be made with full consideration of existing compliance requirements. Currently, audits require providers to produce a CBC approval letter for each employee tied to a specific site. We support efforts to expedite and modernize the CBC process so long as providers retain access to documentation necessary to demonstrate compliance with all applicable regulatory standards.

Int 0135-2026: Inspections and routine closures of child care centers.

Children's Aid support this legislation's efforts to improve communication with families and the general public any time a child care center is closed due to health and safety hazards. Providing clear and timely communication following inspections allows providers and families to plan accordingly and promotes transparency and trust in the early childhood system.

III. Additional Recommendations

1. Develop a Transparent Application Portal

Providers and staff would greatly benefit from a transparent, user-friendly portal that allows applicants to track the status of their background check application in real time. This portal could be modeled after existing platforms like the OCFS system used for School-Age Child Care

(SACC) licensing or the NYCPS Applicant Gateway, which allows applicants to track progress and receive timely updates. We recommend this portal to indicate when applicants have completed required steps and provide alerts when items are missing, so any issues can be quickly resolved to prevent avoidable delays.

2. Ensure DOHMH has Sufficient Staff to Process Background Checks

Hiring freezes and staffing shortages at DOHMH, NYCPS, and other agencies directly contribute to CBC processing delays. These constraints should be reconsidered, as insufficient staffing capacity undermines program operations and exacerbates workforce shortages across the early childhood system.

3. Enhance Coordination between DOHMH's CBC Process and NYCPS' PETS Process

Currently, employees working in child care programs located in NYCPS sites must obtain clearance through both the DOHMH CBC process and the NYCPS PETS system, which can significantly lengthen onboarding timelines. While we recognize that direct data-sharing between agencies may raise privacy concerns, we recommend exploring ways for DOHMH to integrate a PETS check into its own process and issue a clearance that satisfies both requirements. This approach would streamline onboarding while minimizing the need to share sensitive personal information across agencies.

4. Provide Relief to Providers Awaiting CBC Clearances

Child care providers should be held harmless from Corrective Action Plans (CAPs) related to missing background check clearances when they can demonstrate good-faith efforts to complete CBC or PETS requirements. Providers should not be penalized for delays that are outside of their control.

5. Establish a Maximum Processing Timeline

We recommend that the City establish a clear, enforceable maximum processing timeline of five to ten business days for background check determinations. Setting a standard timeline would improve accountability, align expectations across agencies, and ensure that hiring timelines better reflect the operational realities of child care providers.

IV. Closing

A thriving child care ecosystem depends on a stable workforce and efficient systems that support timely hiring. While comprehensive background checks are essential to child safety, the current CBC process creates delays and administrative burdens that make it difficult for providers to staff programs and serve families effectively. These delays also pose broader system-level risks, including challenges to regulatory compliance, limitations on providers' ability to fully utilize available funding, and constraints on the City's overall child care capacity when classrooms cannot open due to staffing shortages.

Addressing these challenges will require sustained investments in agency capacity, clearer communication, improved coordination between systems, and a more transparent and user-friendly background check process.

We thank Chair Gutiérrez and the Council for holding this hearing, and stand ready to partner in strengthening New York City's child care system so it can truly meet the needs of children,

families, and the workforce that serves them. Please feel free to contact Annie Nelson at anelson@childrensaidnyc.org with any questions regarding this testimony.



New York City Council
City Preliminary Budget Hearing - Joint Committees on Health and Mental Health,
Disabilities, and Addiction
Testimony Submitted by Michelle Avila, Director of Public Policy
Thursday, March 19, 2026

On behalf of Children's Aid, I would like to thank Committee Chairs Schulman, Cabán, and Hanif, as well as the members of the New York City Council's Committees on Health and Mental Health, Disabilities, and Addiction, for the opportunity to submit testimony on the Fiscal Year 2027 Preliminary City budget.

For over 170 years, Children's Aid has been committed to ensuring that there are no boundaries to the aspirations of young people and no limits to their potential. We lead a comprehensive counterattack to the obstacles that threaten New York City children and youth achievements in school and in life. Through our early childhood centers, community schools, community centers, health clinics, and School-Based Health Centers (SBHCs), Children's Aid creates trusted, neighborhood-based spaces where families can access the full range of support they need. Today, our more than 2,000 full and part-time staff members empower nearly 50,000 children, youth, and families across more than 40 sites.

As an agency with a strong city and state advocacy agenda, we are supportive members of the Citizens Committee for Children (CCC), the Healthy Minds, Healthy Kids Campaign, the Human Services Council, InUnity Alliance, the NYC Food Policy Alliance, and the downstate chapter of the New York School-Based Health Alliance (NYSBHA). Together, we are on a mission to connect children with the resources they need to learn, grow, and lead successful and independent lives.

Children's Aid works every day at the intersection of health, mental health, food security, and family stability. The priorities we present today reflect both what we see on the ground in our programs and what the evidence tells us works. Across all of these areas, the City has an opportunity to make targeted, cost-effective investments that will improve outcomes for thousands of children and families.

We urge the City to strengthen its investment in youth mental and physical wellness by supporting the following priorities:

- **School-Based Health Centers:** Increase City Tax Levy (CTL) funding for School-Based Health Centers to \$25 million to support all 139 of the City's SBHCs at \$100,000 per site, plus \$100 per enrolled student.
- **Mental Health Initiatives**
 - **Restore \$4.1 million** for community-based services that support the delivery of care to youth with high needs.

- **Allocate \$1.8 million** for early childhood screening, trauma-informed treatment, and child-parent psychotherapy.
- **Extend and baseline funding for the Mental Health Continuum at \$5 million** to ensure students with significant mental health needs continue to have access to expedited mental health care.
- **Double funding for the Court-Involved Youth Mental Health Initiative** from \$3.425 million to \$6.89 million to expand access to evidence-based mental health services for the 3,000 justice-involved youth served annually by 21 providers across the city.
- **Through the City's Discretionary Funding process, enable Children's Aid to:**
 - **Provide trauma-informed mental health services for high-needs and court-involved youth** through the Court-Involved Youth Mental Health Initiative.
 - **Sustain the Health Ambassadors program**, a peer-led initiative providing health education across school communities.
 - **Continue funding for the Mental Health for Vulnerable Populations Initiative**, which delivers mental health support within Youth Empowerment Programs.
- **Response to the Loss of SNAP-Ed:** Coordinate a Citywide response to the elimination of SNAP-Ed by providing bridge funding of \$5 to \$7 million and aligning Human Resources Administration (HRA), the Mayor's Office of Food Policy (MOFP), New York City Public Schools, (NYCPS) and the Department of Health and Human Services (DOHMH) to mitigate nutrition-education and food access gaps that increase reliance on the emergency food system.
- **Health Bucks Program:** Increase baseline funding for Health Bucks from \$500,000 to \$700,000 to expand access to fresh, healthy food for low-income New Yorkers while supporting local farmers.
- **Human Services Cost-of-Living Adjustment:** Support a 3 percent increase to the Citywide Human Services Cost-of-Living Adjustment to help providers address rising operational costs.
- **Access to Health Coverage:** Urge the City to advocate for the State to preserve access to Medicaid and the Essential Plan, preventing the loss of health coverage for millions of children and families across New York.
- **Sexual and Reproductive Health Services:** Commit to supporting high-quality, confidential reproductive health services and work with the State to ensure continued funding for comprehensive family planning and reproductive health care should Title X funding be rescinded.

School-Based Health Centers (SBHCs)

Children's Aid believes one of the most effective ways to keep children healthy is by making health care accessible where they already are—in their schools and communities. School-Based Health Centers (SBHCs) increase access to care, especially for uninsured and immigrant youth, by providing high-quality medical, dental, and behavioral health services within schools. Locating services on school campuses supports working families by allowing young people to receive the care they need with fewer disruptions to their school day and reducing the burden on parents to miss work. Moreover, by addressing medical problems before they become emergencies, SBHCs keep youth out of the emergency room for routine primary care, allowing our already-stressed emergency departments to focus on individuals who need that level of care. SBHCs are a key component of New York State's health equity strategy and serve as a cost-effective, high-impact model for healthcare delivery.

Children's Aid operates six SBHCs offering a range of medical, dental, and behavioral health services. All of our centers are located in low-income neighborhoods, where families face significant barriers to receiving healthcare. In the 2024-2025 school year, our SBHCs treated 3,817 patients and recorded 20,911 visits, including over 14,400 medical visits, 3,425 behavioral health visits, and 4,707 dental visits.

Our SBHCs overcome barriers to accessing primary care services, including immunizations, public health screenings, and care for common conditions, regardless of immigration status, insurance, or ability to pay. They also facilitate access to required physicals for school enrollment and connect families to subspecialists and local primary care providers. Additionally, SBHCs provide reproductive health services that have meaningfully reduced New York City's adolescent pregnancy rates: 14 percent of SBHC patients opt for Long-Acting Reversible Contraceptives (LARCs) compared to just 2 percent in schools without SBHCs. This shift helped prevent more than 5,000 pregnancies and generated an estimated \$30 million in public savings, contributing to as much as 28 percent of the overall decline in teen pregnancies in New York City.¹

In summary, SBHCs are a vital part of the City and State's social safety net, connecting families, especially those with medically complex students, to essential resources they might otherwise lack access to. By providing high-quality care in school, SBHCs prevent emergency room visits, increase student learning time, and reduce parental missed work. They are, in short, an investment that pays for itself many times over.

¹ *New York City School-Based Health Centers, Outcomes Report, 2008–2017* (New York: New York School-Based Health Alliance), showing increases in LARC utilization, associated reductions in teen pregnancies, and estimated public cost savings.



Behavioral and Mental Health Services Delivered at School-Based Health Centers

The mental health needs of New York City's young people have never been more acute. While the isolation, grief, and trauma of the COVID-19 pandemic continue to reverberate, they are now compounded by the profound instability many young people face due to the City's housing crisis, the trauma associated with immigration, and the growing prevalence of food insecurity. An estimated 1 in 7 New York City public school students has lived in shelters within the past year,² a level of displacement that disrupts every aspect of a child's development and sense of safety. Experiences of housing instability, forced migration, and chronic food scarcity are strongly associated with elevated anxiety, depression, and traumatic stress. Meanwhile, the influence of social media continues to shape youth identity, self-worth, and exposure to harm, contributing to rising rates of emotional distress.

The data reflects this crisis clearly. Anxiety screenings are now recommended for all children ages eight and older; depression screenings for all children ages 12 and older. Suicide rates continue to rise at alarming rates, particularly among Black boys and girls, and suicide is now the second leading cause of death for young people nationwide.

Children's Aid is on the frontline of this crisis. Four of our six SBHCs operate on-site Article 31 Mental Health satellite clinics, and all six can connect youth in need to behavioral health services. Our care model includes psychiatry and referrals to our home and community-based Child and Family Treatment Services (CFTSS). Students also have access to Eye Movement Desensitization and Reprocessing (EMDR), an evidence-based trauma treatment that is both highly effective and often difficult and expensive to obtain in community settings. Without holistic mental health services and accessible entry points for care, we are deeply concerned about long-term outcomes for the young people we serve.

Recommendations for SBHC Funding

Despite the critical importance of the services that SBHCs offer, they are chronically and severely underfunded. They are funded primarily through health insurance billing, which covers approximately 50 percent of operating costs, depending on the school. Commercial insurance often does not cover these services at all, or reimburses at rates so low that only a fraction of the cost is covered. This is particularly true for preventive, population-level interventions, like mental health education, wellness programming, and group-based screenings, which are rarely reimbursed by public or private insurance, even though these are precisely the interventions that improve long-term health outcomes. Carrying out this work comes at a loss to the program and requires standalone grant funding to sustain.

² Citizens Committee for Children: Number of homeless New York City public school students reaches a new high, accessible at <https://cccnewyork.org/press-and-media/number-of-homeless-new-york-city-public-school-students-reaches-a-new-high/>.



The financial picture has worsened considerably in recent years. State grants for the 250 SBHCs serving more than 250,000 children have been reduced by more than 25 percent (\$5.8 million) since 2013. In 2017, a 20 percent State budget reduction triggered further cuts, and 27 sponsors saw reductions ranging from 25 to 70 percent due to changes in funding distribution and methodology. In 2019, the State permanently eliminated the Cost-of-Living Adjustment (COLA) for SBHCs. Post-pandemic, SBHCs have yet to recover from an estimated \$26 million in lost Medicaid revenue during school closures. Non-Medicaid state grants, which help cover the deficit created by SBHCs' commitment to serve all children regardless of insurance status, have not kept pace with these losses.

City funding is similarly inadequate. City dollars account for just 6 percent of the annual budget for New York City's 139 SBHCs, approximately \$7.8 million for just 34 centers. The remaining 105 SBHCs receive no direct City funding at all. At the same time, New York City Public Schools (NYCPS) relies on SBHCs to satisfy the State mandate requiring a school nurse at qualifying schools, without providing any additional funding to support that role. And when SBHCs work with students with chronic health conditions—a core part of their mission—that work is not reimbursable by insurance, adding further to the financial burden.

Looking ahead, the pressure on SBHCs is poised to intensify. The State plans to carve SBHCs into Medicaid Managed Care beginning April 1, 2026, a change that is likely to reduce this already insufficient funding stream and further jeopardize sustainability. Simultaneously, ongoing cuts and uncertainty at the federal level threaten the grant funding that sponsoring organizations rely on to subsidize these centers. Together, these pressures risk forcing clinic closures, with serious consequences for children and families who have nowhere else to turn.

This systemic disinvestment has left SBHCs in financial crisis even as the demand for school-based health services continues to grow. Without SBHCs, many children and youth in New York City would remain entirely outside the health care system or rely on overstretched emergency departments for routine care. **We urge the City Council to increase this year's City Tax Levy (CTL) funding for SBHCs to \$25 million, ensuring that all 139 centers are funded at \$100,000 per site, plus \$100 per enrolled student.** SBHCs are uniquely positioned to meet the growing health needs of students across the city, and this investment is essential to preventing further service reductions and closures.

Mental Health Initiatives

As the aforementioned data makes clear, the youth mental health crisis demands a response that reaches beyond the walls of our SBHCs. As a member of both the InUnity Alliance and the Coalition for Equitable Education Funding (CEEF), Children's Aid supports a broader set of investments to ensure that every young person in New York City, regardless of where they live or what challenges they face, can access the mental health support they need. We ask that the City commit to the following in the final FY27 City budget:



- **Restore \$4.1 million toward community-based services to support the delivery of care for high-needs youth.**
- **Allocate \$1.8 million for early childhood screening, trauma-informed treatment, and child-parent psychotherapy.**
- **Extend and baseline funding at \$5 million to ensure students with significant mental health needs continue to have access to expedited mental healthcare.**

Court-Involved Youth Mental Health Initiative

The Council’s Court-Involved Youth Mental Health Initiative funds critical mental health services for some of New York City’s most vulnerable young people. After years of stagnant funding at \$3.425 million, Children’s Aid urges the Council to double this investment to \$6.89 million in FY27, an expansion that is both urgent and overdue.

The need is clear and growing. Over 65 percent of young people in the juvenile justice system have a mental health challenge, and the number of young people in juvenile detention in New York City increased by an alarming 26 percent from 2024 to 2025. Incarcerating young people with unmet mental health needs does not make our communities safer; it deepens the very instability that drives justice involvement in the first place. The Court-Involved Youth Mental Health Initiative represents a smarter approach: funding programs that allow young people to remain at home while receiving treatment and services tailored to their unique needs.

The initiative currently supports 21 providers across New York City, collectively serving 3,000 young people annually. By funding training and technical assistance alongside direct services, the initiative ensures that youth receive evidence-based, high-quality screenings, assessments, and care—not just a referral, but a real connection to treatment. Many programs currently face waitlists and are unable to meet the needs in their communities. Doubling the investment to \$6.89 million would allow the initiative to reach more young people at more programs throughout the five boroughs, reducing those waitlists and ensuring that no young person in crisis is turned away for lack of capacity.

Children’s Aid’s Court-Involved Youth Mental Health Initiative, launched in 2015, is a direct beneficiary of this funding. Our program provides supportive counseling services alongside preparation for high school equivalency, job readiness, and other skill-building activities. We screen and assess a minimum of 100 youth, aged 14–26 annually, in the Bronx and Harlem who are currently at risk of becoming justice-involved or who have previously been involved with the juvenile justice system. Increased funding in FY27 would allow us to expand the number of youths we screen and serve, reduce our waitlist, and deepen the clinical quality of the services



we provide. Investing in this initiative is investing in true public safety: giving young people the tools they need to thrive, rather than cycling them through a system that too often makes matters worse.

We urge the Council to double funding for the Court-Involved Youth Mental Health Initiative from \$3.435 million to \$6.89 million in FY27, and to continue supporting Children's Aid's program through the City's Discretionary Funding process, ensuring that justice-involved youth in the Bronx and Harlem have access to the trauma-informed care and wraparound services they need to heal and thrive.

Additional Health Supports Funded by City Discretionary Grants

Children's Aid operates several programs that rely on City support to deliver critical services. Our mental health initiative for vulnerable youth ensures that high-needs young people are served by licensed professionals who conduct clinical assessments and evaluations to connect youth ages 14–26 to our Youth Empowerment Programs. Based on these assessments, youth are offered individual and/or group therapy, along with case management services, to address risky behaviors, trauma, and other mental health needs.

We also thank the Council for its continued support of the Health Ambassador programs through discretionary funding. The Health Ambassadors in our SBHCs are peer-led groups that provide health education to their school communities. Ambassadors receive comprehensive training on mental and reproductive health topics and share that knowledge with peers through interactive classroom sessions alongside a health educator, while also helping organize monthly events within the school community. These programs build exactly the kind of informed, supportive school culture that buffers young people against mental health risk.

We urge the City to invest in and continue supporting these critical funding streams in FY27 for Children's Aid and other community-based organizations serving children and youth across New York City.

Food & Nutrition Programs: Go!Healthy

Children's Aid's Go!Healthy program addresses food inequities and improves health outcomes for children and families in low- and moderate-income communities across New York City. Through nutrition education, healthy food access, culturally responsive activities, food resiliency programming, and gardening education, Go!Healthy examines food systems through a health equity lens and advances food justice by providing education, leadership, and job opportunities. Each year, we serve over 3,000 individuals, including 1,665 participants in nutrition education. Go!Healthy tackles food insecurity in City Council districts 7, 8, 9, 10, 16, 17, 49, and 50 by providing access to affordable, fresh, and healthy foods. Since 2003, we have promoted wellness



through programming such as nutrition education, culinary demonstrations, gardening, and food box distribution.

Go!Healthy's nutrition education was supported by federal SNAP-Ed funding, a long-standing and vital partner in ensuring these services reach communities with the greatest need. For three decades, SNAP-Ed played a key role in advancing New York's public health and food access goals, helping New Yorkers stretch their food dollars, navigate rising food costs, and make informed decisions about what they eat. Through partnerships with community-based organizations, schools, and local partners, SNAP-Ed delivered practical, culturally relevant education and connected New Yorkers of all ages to fresh, affordable foods in the communities where they live, work, and learn.

That federal investment is now gone. Despite SNAP-Ed's demonstrated importance to preventive health and its broad national success, the federal government eliminated this funding in 2025 with the passage of H.R. 1. New York City now stands to lose not only a network of educators, but also a deeply embedded set of programs operating in schools, community centers, food access hubs, and human-service providers across the city. Many providers have already begun terminating staff and winding down programming because the instability of SNAP-Ed's future makes it impossible to sustain operations or plan for upcoming program cycles. Without action, the City will see a rapid erosion of the infrastructure, partnerships, and neighborhood-level trust that has taken decades to build.

The scale of SNAP-Ed's impact is significant for New York City families. In FY25, SNAP-Ed New York reached 1.845 million participants statewide and delivered more than 35,000 nutrition workshops, many through New York City schools, after-school programs, and community-based organizations. Among participants, 57 percent improved fruit and vegetable intake, 57 percent increased physical activity, and 58 percent engaged in more price comparisons while food shopping. Overall, household food security improved by 25 percent after participating in SNAP-Ed programming.

These outcomes are especially important for New York City as more households struggle with high food prices, reduced SNAP benefits, and anticipated changes in Medicaid eligibility. Every \$1 invested in SNAP-Ed saves up to \$9.541 in future healthcare costs—savings that directly benefit a city system already under strain. Losing SNAP-Ed programming now would increase demands on city-funded services, from emergency food programs to public hospitals, and would undermine the City's own strategies around prevention, chronic disease reduction, and community health.

At Children's Aid, SNAP-Ed plays a central role in our work in the South Bronx, Harlem, Washington Heights, and the north shore of Staten Island, communities that consistently face some of the highest rates of food insecurity and nutrition-related health conditions in the city. SNAP-Ed enabled us to offer steep discounts on locally grown produce, deliver evidence-based nutrition education workshops led by qualified nutritionists, operate a food-as-medicine program, and run school- and community-based distribution sites where families can pick up their children



and fresh foods together. This integrated model is only made possible through dedicated funding. Without City support, these programs will fully cease operations by September 2026.

We strongly support the inclusion of all affected providers in any City investment toward sustaining vital SNAP-Ed programming, and we recognize that many other organizations across the city are facing the same crisis. To help mitigate the immediate impact of the federal elimination, Children's Aid has applied for \$200,000 in City discretionary funds to support this work. More broadly, we urge the City to act at scale:

- **Fund SNAP-Ed Continuation:** Establish City bridge funding of \$5 to \$7 million to continue SNAP-Ed operations through community-based providers, so families retain nutrition education and cost-saving skills, preventing avoidable strain on HRA programs.
- **Align HRA, MOFP, NYCPS, and DOHMH to mitigate nutrition-education gaps that are pushing more families to emergency food.**

Children's Aid is also a member of the NYC Food Policy Alliance, a network of over 60 food system stakeholders that advocates for public policies and funding ensuring equitable access to a healthy, sustainable food system. At a time when 50 percent of working-age New Yorkers are struggling to cover their basic needs, we appreciate the Council's focus on making food healthier, more affordable, and accessible. As part of that broader agenda, we specifically request the Council's support to:

- **Increase baseline funding for Health Bucks from \$500,000 to \$700,000** to expand access to fresh, healthy food for low-income New Yorkers and support local farmers. This proposal funds both components: \$350,000 for SNAP-based farmers market incentives and \$350,000 for Health Bucks through community and faith-based organizations.

The current funding level for community and faith-based organizations has remained static at \$200,000 since 2022, and demand has long since outpaced available resources. In 2024, the NYC Department of Health and Mental Hygiene (DOHMH) received 600 applications from local organizations for Health Bucks, but was unable to fully fund all requests, leaving many with less than they needed or without funding altogether. By distributing Health Bucks through organizations that integrate them into nutrition and health programming, the program reinforces nutrition education, ensuring that participants have both the knowledge and the financial resources to make healthier food choices.

Human Services Staff Retention

Like many human services providers, Children's Aid is experiencing high turnover among frontline staff, including social workers, teachers, education professionals, and mental health practitioners, who are leaving for sectors that offer higher pay. Current contracts do not provide adequate compensation for these professionals, making it increasingly difficult to remain competitive in the labor market.

This is not just an operational challenge; it is an equity issue. Human service workers are predominantly female (66 percent), with over two-thirds being full-time workers of color (68 percent) and nearly half (46 percent) women of color. The chronic underpayment of this workforce reflects and reinforces broader racial and gender wage disparities. Without targeted investment, providers will continue to struggle to recruit and retain qualified staff, directly affecting the quality and stability of programs available to young people and families. We urge the Council to:

- **Include the previously negotiated 3 percent cost-of-living adjustment (COLA)**, allowing service providers to address rising costs and maintain a stable, qualified workforce.

Medicaid & the Essential Plan

Children's Aid remains deeply concerned about the impact of recent federal actions on Medicaid and the Essential Plan, which continue to create instability for New Yorkers who rely on these programs. These shifts introduce uncertainty at a time when families, especially those with children, need consistent and affordable access to care.

The federal government has granted preliminary approval for New York State to reduce Essential Plan eligibility from 250% to 200% of the Federal Poverty Line—an annual income level of just \$32,000 for an individual, compared to roughly \$40,000 at 250% FPL. This lower threshold is far too low for New York City, where high costs already strain household budgets. While the federal approval would preserve coverage for 1.3 million New Yorkers, we remain concerned about the 470,000 individuals earning between 200% and 250% of the FPL who stand to lose coverage as early as July 2026.

When a parent cannot afford treatment or medication, that instability touches every aspect of a child's well-being. We see these dynamics every day in our community centers, schools, and health clinics. Given recent federal actions that are reducing health care eligibility and creating new barriers to coverage, we urge the City to commit to the following priorities in the final FY27 budget:

- **Advocate for the State to protect Medicaid and the Essential Plan**, including by leveraging previously set aside \$2.5 billion in funds to protect coverage for 470,000 enrollees threatened with the loss of the Essential Plan, ensuring that children and families do not lose access to affordable healthcare. Preserving these programs is critical to preventing coverage losses that would disproportionately harm low-income communities.
- **Advocate for Medicaid Managed Care plans to reimburse pediatric providers at least at Medicaid fee-for-service rates.** Persistent payment inequities in Medicaid



Managed Care undermine the financial stability of community pediatric practices and threaten access to high-quality care for children across New York City.

Sexual & Reproductive Health

Children's Aid offers comprehensive, age-appropriate sexual health education and reproductive health care services, as well as support for young people to build the tools they need to make healthy and informed choices. Our programs help young people prevent unplanned pregnancy, HIV, and STIs so they can focus on school, make safe decisions, and prepare for their futures.

Federal funding for reproductive health and medically accurate sexual health education is increasingly uncertain, and the City has an important role to play in ensuring these services remain available. Given this uncertainty, we ask that the City commit to the following for the final FY27 City budget:

- **Fund high-quality reproductive health services** and work with the State to commit to funding comprehensive family planning and reproductive health services, should federal funding for Title X be rescinded.

Closing

Children's Aid sincerely thanks the New York City Council for its vigorous support of the most underserved families and communities in New York. These investments are not isolated line items; they are interconnected pieces of a safety net that, taken together, determine whether children in our communities have access to a doctor, a counselor, a healthy meal, and a stable future. New York City has a unique opportunity to address the health and mental health crisis facing young people by investing in effective, cost-efficient, and life-saving services. We stand ready to partner with the Council in improving health access and outcomes for New York City's youth. If you have any questions about this submitted testimony, please contact Michelle Avila, Director of Public Policy, at mavila@childrensaidnyc.org.

Testimony to the NYC Council Subcommittee on Early Childhood Education

Hearing on Oversight and Transparency in Child Care Facilities April 13, 2026

To Chair Gutiérrez and members of the Subcommittee on Early Childhood Education:

I am writing as a parent to testify regarding the catastrophic systemic failures in the oversight of New York City daycare facilities, specifically the case of Eva Creche in Brooklyn. The recent criminal charges against a staff member for child abuse are not just a failure of one individual, but the direct result of a "safety net" that failed at every stage: vetting, inspection, and enforcement.

1. The Vetting Failure: Ignoring Proven Risks

The first failure occurs before a child ever enters a facility. The DOHMH granted a permit to this operator despite a 2020 state-level revocation of their prior license. That revocation was issued because the provider was violating staff-to-child ratios and refusing inspection access.

When questioned, the DOHMH justified this permit by stating the prior revocation did not indicate "immediate harm" to children. This reasoning is fundamentally bogus. If an operator successfully refuses inspection access, the Department cannot physically verify if harm is occurring. Using a "lack of documented harm" that was only "lacking" because the operator blocked the door as a reason to grant a new permit creates a dangerous loophole. It rewards the most obstructive providers with a clean slate and prioritizes an operator's right to a permit over the precautionary principle of child safety.

2. The Inspection Failure: 300% Capacity and Unvetted Spaces

The physical oversight of this facility was fundamentally broken. According to whistleblower testimony, the facility was operating at **300% of its legal capacity** at the time it voluntarily closed. This means dozens of children were being hidden from official tallies while in the city's care.

Furthermore, the facility was utilizing basement space for children before it had been properly vetted or approved by DOHMH supervisors. When inspectors fail to detect that a facility is housing three times the children it is permitted for, and using unvetted spaces, the inspection process is failing in its most basic duty: counting the children and checking the rooms.

3. The Investigative Failure: Protecting Operators over Children

The most harrowing failure occurred when a whistleblower actually tried to report the abuse. Following this report, DOHMH inspector Nikole Morris conducted an investigation that was a mockery of oversight. Her own records indicate she watched only one day of

video recordings and interviewed a staff member who was not even working with the abuser during the month the abuse was alleged to have occurred.

She even noted a total lack of mandatory incident reports but used that absence of paperwork to justify a "No Cause" finding, allowing the facility to keep operating. The consequences of this failed inspection were immediate:

- The whistleblower was fired by the operators for coming forward.
- The operators (Shareece Dukes and Gigi Freeman) despite being state-mandated reporters and hearing the recordings of the abuse directly from the whistleblower, failed to report it to the authorities.
- Action was only taken after the whistleblower, having been ignored by the city and fired by the operator, shared the recordings directly with parents.

4. The Enforcement Loophole: Evasion through Closure

Finally, the system allowed the operator to escape accountability. Once new, substantiated complaints were submitted, the DOHMH was unable to access the facility because the operator "voluntarily" shut down. Because of this loophole, it remains unclear if the DOHMH was ever able to fully investigate the extent of the abuse on-site or secure the evidence needed for administrative justice.

Recommendations for the Subcommittee

The current system allows bad actors to hide behind administrative loopholes while whistleblowers are punished for protecting children. I urge the Council to:

- Ensure immediate digital notification to parents when a center is under investigation or denies access to inspectors.
- Mandate that any prior revocation for ratio violations or refusal of access results in an automatic, permanent denial of future permits. **"No immediate harm" must never be used to excuse a history of obstruction.**
- Create a direct, protected channel for daycare employees to report abuse to the city that bypasses management and triggers an immediate response.
- Ensure the DOHMH and law enforcement maintain the power to inspect and seize records even if a facility chooses to close during an active investigation.

The city must stop providing a false sense of security and start providing actual oversight. Our children's safety cannot depend on the bravery of a single employee who is then left to face retaliation alone.

Thank you for your time and your commitment to this urgent reform.

Respectfully,

Hayro Gunc

April 20, 2026

Oversight Topic: Child Care Program Background Checks.

Testimony by, Rebecca Schneider-Kaplan (Ms. Becky)
UPK-4 Teacher, Stepping Stones Preschool

The amendment to the background check process is necessary so qualified educators can begin working in schools more quickly, whether they are new hires or transferring from another CBO. Right now, when an applicant transfers schools, their prior background check is often not accepted, forcing them to complete a new clearance for each individual site. This creates unnecessary delays in hiring and becomes yet another deterrent for educators considering work in CBOs. In many larger school settings, this same level of delay does not occur. New educators, especially those who need immediate employment, often cannot afford to wait weeks to start working.

Another needed revision is to the fingerprinting process. I was fingerprinted by the NYCDOE while student teaching, then fingerprinted again for DOHMH. After the fingerprinting rules for CBOs changed, I had to repeat the process through IdentoGO. Then again this year, I was told during a DOHMH visit that I needed to be fingerprinted once more through IdentoGO. Each time, this costs over \$100, which is a serious burden for educators already struggling financially. Fingerprints do not change, and educators should not have to keep paying for repeated prints because of shifting agency requirements.

Lastly, I believe this amendment would also help reduce some of the administrative burden currently placed on secretaries and directors, who are left to manage these repetitive and time-consuming compliance issues.



April 22, 2026

New York City Council
Subcommittee on Early Childhood Education jointly with
Committee on Health, and
Committee on Oversight and Investigations
Council Chambers
New York, NY 10007

New York City Council Joint Oversight Hearing: Child Care Program Background Checks

Dear Chair Gutiérrez, Chair Schulman, Chair Krishnan and Members of the Committees,

Thank you very much for holding this oversight hearing on the critical topic of ***Child Care Program Background Checks***. New York City has made significant investments in early childhood education and care and none of the services provided would be possible without a strong dedicated early childhood educator workforce that is cleared to work in programs across the city. As the City continues to look to serve more New Yorkers, the workforce and a speedy CBC process will continue to be critically important.

Bright Horizons has been providing early childhood education and care in NYC for over three decades and has grown during that time to serve 6,000 families across 40 locations licensed by the Department of Health and Mental Hygiene (DOHMH), with many of our programs delivering 3K and PreK for All through the Department of Education (DOE) and several licensed by the NY Office of Children and Family Services (OCFS) to serve school age children. We are very proud of the programs we manage across NY and recognize that none of the education and care we provide for NYC families would be possible without the 825 NYC based employees that make up our early educator workforce.

As you consider addressing the current challenges with CBC processing for DOHMH licensed programs, we think it is important to remember three key facts:

1. DOHMH, DOE and OCFS each have their own CBC regulations and processes for individuals working in their respective licensed/contracted programs. In NYC, and only in NYC, individuals working in child care centers, in some cases, are required to obtain separate CBC clearances from all three agencies.
2. All DOHMH licensed child care centers in NYC that care for children both under two and over two have two licenses from DOHMH. One license for children 0-2 years old and a separate license for children 2-5 years old. NYC is the only jurisdiction that requires multiple licenses to serve different age children between birth and kindergarten in the same center. For an educator in NYC to support any classroom that has a different license than the one they are CBC cleared under, even if in the same building across the hall, they must submit a CBC clearance request if they have not done so already. Group Teachers, as defined by DOHMH, are only allowed to be cleared on one license so they can not cross the hall even in the case of someone calling out sick or getting urgently sick during the day.
3. The Child Care & Development Block Grant (CCDBG) regulations include updated comprehensive background check requirements that became effective in September of 2019. As part of the CCDBG requirement, all CBC requests for child care employees must be completed within 45-days of submission.

Bright Horizons is thankful for the support these committees have shown for improving the CBC process and reducing the backlog for DOHMH licensed programs, including conducting a similar hearing in October 2023 on this topic. Our testimony in that 2023 hearing noted that, over the previous 12 months, CBC clearances for our employees were taking an average of ten months to complete and that in the most recent quarter, they were averaging between 60 and 90 days to complete.

Bright Horizons is also incredibly thankful for the improvements implemented by DOHMH with the creation of a CBC submission portal in May of 2023 (previously all requests were sent by fax) and, the introduction of limited portability for assistant teachers at the start of 2026. This added portability allows an assistant teacher that is new to a license, but that has a current CBC clearance under a different DOHMH license within the past five years with no break in service of more than 180 days, to work under the new license without line-of-sight supervision once a CBC request is submitted for the new license. Both of those improvements were common-sense solutions that saved both city and provider resources and made a big difference and allowed educators to serve children more quickly. A review of the requests Bright Horizons has submitted over the most recent 12 months indicates that the average time to complete DOHMH CBC requests was 49 days, with the range being as quick as 6 days and as long as 247 days. This is a tremendous improvement from your last hearing on this topic (2023). More improvement is needed as only 53% of our CBC requests to DOHMH were completed within the federal maximum 45-days allowed under CCDBG.

We believe INT0015-2026 by Council Members Abreu, Louis, Hudson, Hanif, Dinowitz and Brewer is another common-sense solution that will greatly benefit the city, providers, educators and families by further simplifying the CBC process and expanding current portability to all employees in DOHMH licensed programs. I think we would all agree that an individual's criminal background does not change based on the specific classroom or program they work in, and that it is a much higher priority for DOHMH and providers to focus their limited resources on thoroughly and quickly processing the CBC for individuals not previously cleared by DOHMH. Passing INT0015 would do that, which would help providers and their educators to better meet the needs of New York families, and reduce the workload on city resources dedicated to processing CBC requests. We believe that would allow DOHMH to complete more first time CBC requests within the federal maximum requirement of 45-days.

Some examples of situations that INT0015 would support:

1. All employees in the same child care center (same building) could cover for other employees that are out sick or on vacation. This is allowed already for all those serving children on the same license, but to work under a different license currently requires its own CBC clearance. Currently group teachers can not cover for someone on the other license although assistant teachers are allowed to cover for someone on the other license once a request is submitted for the CBC to be re-processed and extended to the other license.
 - a. This is an improvement as prior to 2026, assistant teachers had to wait for the CBC to be fully processed and cleared before they could cover for someone in the same building without line-of-sight supervision.
 - b. To further reinforce the importance of this portability, to cross to another license, even for 10 minutes while someone urgently goes to the bathroom triggers needing to request a CBC extension before covering (unless they were already processed) and Group Teachers can not even cover an emergency bathroom break.
2. All employees would be able to work in other DOHMH licensed programs and stay with their children (continuity of care) in the event of a short-term program closure or relocation. We have a child care program in a building that experienced flooding in March and needed to close for a couple days for repairs and cleaning. We were able to relocate all the children to other Bright Horizons programs, so no family went without care for even a day. We were also able to relocate the assistant teachers once we submitted a request to have the CBC rerun to include the new location. Prior to 2026, we would not have been able to move any teachers in time to avoid disruptions to families and the workforce. However, even with recent DOHMH improvements in portability, we were unable to move the Group Teachers or Education Director to support the same children and teachers, as those positions are not allowed to be cleared under more than one license.
 - a. If this were a long-term relocation we could have requested the Group Teachers and Education Director be expunged from the flooded program and then requested a CBC clearance for them to be put on the new location but the processing time likely would have extended beyond the program closure dates (not to mention that when the flooded program re-opened the process would need to be reversed).
3. All 3K and PreK for all teachers, who are already cleared by both DOHMH and DOE, could support other teacher vacations or absences during times when the 3K/PreK programs are closed (such as school holidays and vacations or after the end of the school day). This would have been

incredibly valuable last week as schools were closed in NYC for April vacation and several teachers requested to work in other locations to earn some extra money.

4. INT0015 would also open new employment opportunities for individuals of an early education program that would like to work for a different employer in NYC without delay. This is especially true for Group Teacher and Education Directors that do not have any portability for their CBC clearance currently.

There are many other examples of the benefits of INT0015 that we would be happy to discuss with those interested and we know the lack of portability of DOHMH CBC clearances makes it challenging for all providers that operate DOHMH licensed programs in NYC.

Bright Horizons strongly supports your consideration of INT0015 and hopes that the City Council will pass INT0015 as quickly as possible to relieve the strain on DOHMH, child care providers, educators and families in NYC. INT0015 is a common-sense solution that will make a real difference and, by allowing individuals with DOHMH CBC clearances the portability to avoid subsequent processing, will free resources to expedite CBC processing of individuals that have not previously been cleared, and hopefully allow DOHMH to process new CBC requests within the CCDBG 45-day maximum. We believe this is critically important, especially as NYC intends to expand its early education offerings which will require more CBC cleared educators.

Respectfully submitted,

Michael Day

Senior Vice President

Bright Horizons

www.BrightHorizons.com



**NYC Council Subcommittee on Early Childhood Education
Oversight Hearing: Child Care Program Background Checks
Wednesday, April 22nd, 2026**

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

Thank you, Chair Gutierrez and the Subcommittee on Early Childhood Education, for addressing the technical challenges being faced by childcare providers that are having detrimental impacts on attracting and retaining staff, and the overall capacity of programs across New York City. As New York City and State prepare to take meaningful steps in expanding free/affordable care towards a universal system, it is imperative that the policies and practices that hinder the workforce and ultimately our ability to actualize universal childcare are proactively and collaboratively addressed, so that program capacity across the city can grow to accommodate the increased demand on enrollment.

CHCF serves as one of New York City's four Child Care Referral Agencies within the New York City Child Care Resource and Referral Consortium¹, in addition to leading a Family Child Care Network in partnership with NYCPS DECE, and delivering Early Head Start in contract with the Federal Office of Head Start. Our early care and education team continues to meet the comprehensive and evolving needs of childcare and early learning programs – predominantly for Family Child Care programs and providers whose primary language is other than English.

Our multilingual services include support with license application, license renewal, quality rating improvement assessments and coaching, business training, pedagogical and curricular training, culturally responsive and sustaining resource distribution, and professional development. We make it a point to stay closely connected to the realities faced by programs and know that there is an overall challenge with staffing, largely due to the low compensation of this field and lack of benefits; in addition to the impact of severely delayed background check clearances on retaining staff.

We join our advocacy partners in supporting a comprehensive review of the background check process across agencies, identifying cogs in the system that are resulting in delayed clearances, and creating a transparent plan for addressing and removing the barriers to joining the childcare workforce in a timely manner. CHCF of course supports thorough background checks and wants to insure that child safety and well-being are at the center of any changes to

¹ NYC CCRC: <https://nyccrr.org/>





processes; however, the current system seems to have unnecessary delays, which may be in part to inconsistent responsiveness by the staff that oversee clearances at DOHMH.

We have discussed the issue with OCFS over the years, and they maintain that the delay is not on their end. Due to a systematic lack of transparency, there is no way for providers and other stakeholders to really know what has historically fueled the delay in processing. We hope that we are collectively able to move beyond administrative defensiveness and collectively deliver the necessary support to DOHMH to streamline the process. Whatever the cause, we continue to hear that programs do experience delays in full clearance, which stagnate their ability to maintain enrollment at capacity levels or adjust to any changes in enrollment that would necessitate timely hiring of additional staff (i.e. enrolling more infants).

CHCF, as a SACC-licensed provider, has also directly experienced the difficulties of getting new hires through the clearance system, with the process at times taking months. In the past, this has delayed our ability to open classrooms due to inadequate staffing to maintain ratios, to the detriment of our families and students, and an uncertainty about when new staff will receive their clearance. Further, with the process taking so long, by the time we would return to the pending hires they often had already moved on to a new job because they simply could not afford to wait for an income.

Given the intention of the city to move towards a universal childcare system, and the forthcoming expansions 3K and 4K, as well as the ongoing deserts for infant care across the city, it is essential that the city determine substantive system changes that will remove undue barriers and cogs ahead of an increased demand on staffing clearances to accommodate the increased demand of services.

We offer some recommendations for addressing delays in background check clearances:

1. To remove unnecessary duplicative steps in the process, the city should assess instances of prospective staff having to clear separate processes across multiple agencies (i.e. transferring clearances from PETS).
2. Given the extensive childcare sector, movement between programs can be common. While we do not want to safeguard against risk of problematic staff moving easily from program to program, an appropriate application of portability of clearance would allow for staff who have recently been cleared to begin a position elsewhere in a timely manner. A method of portability would also assist in the use of a substitute pool to support the sector.





3. To streamline the system, it is imperative that transparency of processes is established to not only communicate where any given individual is at in the process and anticipated timelines for clearance; but to also smooth communications between agency and applicant about any missing materials and means for the individual to return them in a timely manner so as not to delay the process. In this vein, city agencies by and large have a lot of work to do to improve digitized systems that reflect real time processing.

Thank you, again, for your leadership on addressing long-standing systems issues proactively, ahead of significant increase to demand on the agencies and systems that collectively oversee the childcare system in New York City.

CHCF is a non-profit organization with a 44-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. To find out more about our organizational work or to ask questions of the provided testimony, please reach out to Danielle Demeuse, Director of Policy for CHCF, at ddemeuse@chcfinc.org.



April 22, 2026 - Learning Care

New York City Council Committee on Health, jointly with the Committee on Oversight & Investigations, and the Subcommittee on Early Childhood Education

Testimony in support of Int. 0015-2026

Chair and Members of the Subcommittee:

Thank you for the opportunity to submit testimony in strong support of Int. 0015-2026. New York City has made historic commitments to expanding access to quality, affordable child care — commitments that reflect a clear-eyed understanding of what families need to thrive and what a just, equitable city must provide. Int. 15 is an important piece of that broader project. By modernizing and streamlining background check requirements for child care workers, this legislation helps ensure that the City's expanding child care infrastructure is built on a foundation of rigorous, consistent safety standards.

Learning Care is a leading provider of high-quality care and education for children ages six weeks through 12 years. In our three New York City locations, serving the families of Bay Ridge, Murray Hill, and Sunset Park, we provide an environment where children socialize, play, practice new skills, and develop a love of learning. We know that when children thrive, communities grow stronger.

We are the workforce behind the workforce, and ultimately, when teachers and school staff experience lengthy delays in the background check process, it undermines our ability to serve families and children. The lack of portability also fails to recognize the reality that a background clearance pertains to an individual educator, not an specific program or license.

Background Checks Must Be Thorough and Complete

The foundation of any effective background check system is comprehensiveness. As the City scales up its child care programs, it must ensure that all checks are conducted in a prompt manner. This legislation will do just that, by prioritizing new child care workforce and verifying that the professionals entrusted with their safety and wellbeing have been fully vetted by the Department of Health and Mental Hygiene, to the robust standard set under federal law.

Timeliness Is a Safety Imperative

A background check that takes weeks or months to complete creates real operational burdens for providers and undermines investments in

Learning Care

21333 Haggerty Rd.

Suite 300

Novi, MI 48375

[LearningCare.com](https://www.learningcare.com)



affordability and availability made by the City for New York families. The portability provisions of Int. 15 help address this problem by allowing a cleared worker to carry a recent, verified check from one program to another — reducing redundant delay without compromising safety. We strongly support this approach, and we encourage the City to pair it with clear processing timelines for initial checks. Administrators and families alike deserve a system that is both trustworthy and timely.

Prioritize Those Without Recent Clearance

Not all background check requests carry the same level of urgency. Workers who have never undergone a clearance, whose last check predates a reasonable look-back window, or who are re-entering the child care workforce after a long employment gap should be prioritized for processing over those seeking portability transfers of recently completed checks. This legislation reflects this urgency and creates a triage framework to direct administrative attention and resources appropriately.

We thank Majority Leader Abreu and members of the Council for their leadership on this legislation that treats child safety and workforce sustainability as complementary, rather than competing, goals. A well-designed background check portability system reduces burdens on DOHMH, early childhood educators, and providers while maintaining and strengthening the integrity of the background clearance process.

We urge the Subcommittee to advance Int. 15 and to ensure that the rules developed to implement it reflect the principles of comprehensiveness, timeliness, and risk-based prioritization outlined above.

Thank you for your leadership on behalf of the City's children and families.

Respectfully submitted,

Brian Gutman, SVP Public Policy and Government Relations
Learning Care

Learning Care

21333 Haggerty Rd.
Suite 300
Novi, MI 48375

**Testimony before the
New York City Council Committee on Oversight and Investigations
Jointly with the Committee on Health and
the Subcommittee on Early Childhood Education
Regarding Background Checks for Child Care Providers, Employees, and Volunteers**

Presented By
Washcarina Martinez Alonzo (Manhattan Legal Services)
April 24, 2026

This testimony is submitted on behalf of Legal Services NYC (LSNYC). LSNYC is thankful for the opportunity to make this submission and to provide commentary.

As one of the principal law firms for low-income people in New York City, LSNYC is an anti-poverty organization that seeks justice for poor New Yorkers. Manhattan Legal Services is a constituent corporation of LSNYC. For more than fifty years, we have helped our clients meet basic human needs and challenged the systemic injustices that keep them poor. As the largest civil legal services program in the country with community-based offices and numerous outreach sites located throughout the city's five boroughs, LSNYC has a singular overriding mission: to provide expert legal assistance that improves the lives and communities of low-income New Yorkers. We ensure low-income New Yorkers have access to housing, health care, food, and income providing help that benefited 115,000 New Yorkers and their family members.

Our Barriers to Employment Project serves to improve job prospects for *all* New Yorkers by recognizing the need to close the employment gap for New Yorkers of color and survivors of domestic violence who experience disproportionate limitations on employment. The Project has helped hundreds of clients clear their names and remove barriers to their employment, and has conducted outreach to educate New Yorkers on their legal rights. The Project has also published reports, worked in coalition with other legal and community organizations, and raised media awareness to change policies that keep New Yorkers in a cycle of poverty.

We are here to offer testimony as to our experiences representing numerous clients navigating the process of clearing their names and obtaining clearance to work at the State and local level. Our goal is to further expand access and opportunities for gainful employment for New Yorkers who experience both the family regulation and criminal justice system so that *all* New Yorkers have the opportunity to escape poverty.

Demand Justice.

Summary of Background Check Requirements

Responding to changes in Federal Child Care Community Development Block Grant (CCDBG) requirements,¹ New York City rolled out its Comprehensive Background Check (CBC) system on September 25, 2019. Under this, the New York City (NYC) Department of Health and Mental Hygiene (DOHMH) conducts CBCs on all staff and volunteers in NYC child care centers for the preceding five years.² Such background checks include:

1. A State Criminal History Check with the New York State (NYS) Division of Criminal Justice Services;
2. A National Criminal Record Check with the Federal Bureau of Investigation;
3. A New York State Sex Offender Registry Check; and
4. A New York State Statewide Central Register of Child Care and Maltreatment Check (SCR).

If a candidate has lived outside of NYS in the past five years, DOHMH is mandated to perform additional checks with the criminal history repository, the sex offender registry, and the child abuse and maltreatment registry of every state or territory where the candidate has lived over such five years.³

While federal rules have strict regulations about the types of background checks that must be conducted for all staff and volunteers in child care centers, the regulations allow for discretion on how the results of these checks are used for employment clearances. For example, while federal regulations require a SCR check, the regulations do not include any automatic disqualification for appearing on such a registry and do not specify any action that must be taken if a child care staff member appears on the SCR. For criminal background checks, federal regulations disqualify employment for individuals with convictions falling in nine specific categories.⁴

¹ See Child Care and Development Fund (CCDF) Program, 81 FR 67438-01.

² See 45 Code of Federal Regulations § 98.43(b)(3); *Background Checks for Group Child Care Programs*, NYC DOHMH, <https://www.nyc.gov/site/doh/business/permits-and-licenses/cbc-group-child-care.page> (last accessed April 24, 2026).

³ See 45 Code of Federal Regulations § 98.43.

⁴ See 45 Code of Federal Regulations § 98.43(c)(iv). Federal regulations outright prohibit the following crimes from holding employment only under the relevant regulations:

- (A) Murder;
- (B) Child abuse or neglect;
- (C) A crime against children, including child pornography;
- (D) Spousal abuse;
- (E) A crime involving rape or sexual assault;

Federal regulations do not broadly disqualify everyone with a criminal history from obtaining employment in child care.

CBCs are thorough and require local, State, and Federal resources to complete *for a single candidate*. New York City’s child-care workforce has tripled since 1990.⁵ As a result, DOHMH experiences difficulty and delay in assessing numerous levels of clearances. In addition to disproportionately lagging wages,⁶ delays in processing CBCs keep child care workers out of work and in poverty. While federal regulations require an appeal process for evaluating a candidate’s eligibility for employment, NYC DOHMH offers no clear guidelines for appealing a rejected application. The lack of clarity as to the CBC process, in addition to the discriminatory nature of criminal and family registries, stymie low-income people of color’s ability to gain work in the fields in which they are most likely to hold employment.

Discriminatory Nature of Criminal and Family Regulation Records

Black and Latino New Yorkers are disproportionately harmed by the effects of a discriminatory criminal justice system as they are more likely to be “stop and frisk” by the NYPD.⁷ New Yorkers who are arrested are also at immediate risk of losing their jobs, even without a conviction, as these CBCs can also divulge pending arrests.

As noted in our report, “The Far-Reaching Impact of ACS’s Discriminatory Investigations on Women of Color and Survivors of Gender-Based Violence,” the very same NYC communities targeted by unfair “stop and frisk” policies are also more likely to be disproportionately targeted

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- (F) Kidnapping;
 - (G) Arson;
 - (H) Physical assault or battery; or
 - (I) ... a drug-related offense committed during the preceding 5 years.

⁵ Liss, Emily, Daycare Council of New York City, *Building a Stronger Childcare Workforce for New York City: Child Care Recommendations for a Thriving Early Childhood System*, Page 32, <https://www.dccnyinc.org/wp-content/uploads/2025/12/Workforce-Report-7sm.pdf>, (last accessed April 24, 2026).

⁶ Coffey, Maureen and Khattar, Rose, *The Child Care Sector Is Still Struggling To Hire Workers*, The Center for American Progress (Oct. 19, 2023), <https://www.americanprogress.org/article/the-child-care-sector-is-still-struggling-to-hire-workers/> (last access April 24, 2026).

⁷ “From 2003-2024, 90 percent of people stopped by the NYPD were people of color. Black and Latinx New Yorkers made up 52 percent and 31 percent of all stops despite being 23 and 29 percent of the population, respectively. White New Yorkers only made up 10 percent of stops though they represent 33 percent of the population.”

A Closer Look at Stop-and-Frisk in NYC (May 27, 2025), ACLU of New York, available at: <https://www.nyclu.org/data/closer-look-stop-and-frisk-nyc#race> (last accessed April 24, 2025).

in child welfare investigations of abuse and neglect by the NYC Administration for Children’s Services (ACS), landing them on the State Central Register.⁸ While Black and Hispanic people make up only 48% of NYC’s population, they account for 81% of child welfare investigations and 83% of indicated reports. ACS disproportionately investigates communities with high poverty rates. We noted these patterns of over-policing in areas such as Harlem, the Bronx, North Staten Island, East Brooklyn, and South Queens, where communities are more likely to be poor *while simultaneously* being more likely to be subject to criminal “stop and frisks” and child welfare investigations. Summarily, low-income New Yorkers of color are most likely to have issues with CBCs as they are more likely to experience harmful discriminatory exposure to the criminal justice and family regulation system.

Survivors of domestic violence are also over represented in child-welfare investigations, leading to disparate outcomes in clearing their name. Our research found that 28% of ACS investigations were flagged for domestic violence, highlighting the over-policing of survivors who seek help. We have seen clients who have escaped an abusive relationship and suddenly face job insecurity due to ACS investigations related to the abuse they experienced and whose only allegation of neglect is experiencing violence in a household with children present. Through CBCs, these very survivors are limited from the jobs that can keep them safe. A survey by the Institute for Women’s Policy Research found that 83% of survivors surveyed reported that their abusive partners disrupted their ability to work. Of those who reported experiencing one or more disruptions, 70% said they were not able to have a job when they wanted or needed one and 53% said they lost a job because of the abuse.⁹ Given their disproportionate likelihood of ending up in a child welfare investigation, survivors of domestic violence are disproportionately likely to experience issues with the CBCs.

DOHMH’s Broad Approach Disproportionately Restricts Employment for People of Color and Survivors of Domestic Violence

We have assisted clients who lost work opportunities based on DOHMH’s broad application of the CBC criteria. In one case, a client lost an employment opportunity following a CBC due to sealed convictions dating back to 1998. Despite the law’s prohibition on the evaluation of sealed convictions for most employment¹⁰ and the fact that federal regulations only require that CBCs evaluate convictions from the past 5 years¹¹ for *most* jobs, DOHMH rejected the client’s clearance because a “criminal issue exists.”

⁸ Martinez Alonzo, Washcarina, C.C., Goldman, Caitlin, *The Far-Reaching Impact of ACS’s Discriminatory Investigations on Women of Color and Survivors of Gender-Based Violence* (April 17, 2025), Legal Services of NYC, available at: <https://www.legalservicesnyc.org/wp-content/uploads/2025/04/Report-ACS-Discriminatory-Investigations.pdf> (last accessed April 24, 2026).

⁹ Hess, C., & Del Rosario, A., *Dreams Deferred: A Survey on the Impact of Intimate Partner Violence on Survivors’ Education, Careers, and Economic Security* (2018), Institute for Women’s Policy Research, https://iwpr.org/wp-content/uploads/2020/09/C475_IWPR-Report-Dreams-Deferred.pdf. (last accessed April 24, 2025).

¹⁰ See N.Y. Criminal Procedure Law § 160.5.

¹¹ See 45 Code of Federal Regulations § 98.43(b)(3).

Further, in our experience, DOHMH requests that applicants sign releases divulging all records, including sealed records, from the State Central Register (SCR). We have witnessed matters where DOHMH also inquires as to sealed unfounded reports on the SCR. Freedom of Information Law (FOIL) data, analyzed in our report, shows that *most child welfare investigations are unfounded*. Thus, the DOHMH's request for *all* SCR records is generally over inclusive as the great majority of those records resulted in legally sealed unfounded reports. Additionally, more than 70 percent of indicated reports on the SCR are for neglect, which involve allegations that stem directly from poverty.¹² Indeed, the reliability of SCR records for employment purposes has been subject to much scrutiny in recent years in New York, resulting in statewide legislative reform in 2022 that, among other changes, limited the length of time that indicated reports could be used for employment purposes.¹³ Despite this, DOHMH seems to be using even unfounded reports as a reason to deny employment clearance to New Yorkers. Such over inclusivity, as discussed above, is likely to disproportionately affect low-income New Yorkers of color who are more likely to be investigated by ACS. This system only further reinforces a cycle of poverty and decreases the pool of applicants who can work in childcare.

Low-income New Yorkers who are women of color are more likely to hold positions in the early childhood workforce as compared to their white counter-parts. A 2025 report found that 95% of care workers identify as female. The same study found that 40% of child care workers in New York City identify as Hispanic and 29% identify as Black.¹⁴ New York State's early childhood workforce also experiences a 14.5% poverty rate, a rate 5.6 times higher than elementary and middle school teachers.¹⁵ The same population that is more likely to be targeted by the family regulation and/or criminal system is also the population that is more likely to hold the jobs that are subject to CBCs.

As a result, the same disproportionate policing which gets low-income New Yorkers into the criminal and/or family regulation system, is also disproportionately keeping them from getting employment in industries covered by CBCs.

Concerns about DOHMH's Broad Approach and Services Disruptions

A statewide survey from March 2022 revealed that over 28,000 families across New York State are going without child care due to understaffing because 90% of the surveyed centers

¹² Martinez Alonzo, *The Far-Reaching Impact of ACS's Discriminatory Investigations on Women of Color and Survivors of Gender-Based Violence*, Page 5.

¹³ See Gottlieb, C., *Major Reform of New York's Child Abuse and Maltreatment Register* (May 26, 2020), New York Law Journal, available at: <https://www.law.com/newyorklawjournal/2020/05/26/major-reform-of-new-yorks-child-abuse-and-maltreatment-register/> (last accessed: April 24, 2026).

¹⁴ Liss, *Building a Stronger Childcare Workforce for New York City: Child Care Recommendations for a Thriving Early Childhood System*, Pages 15-16.

¹⁵ *State Profiles: New York* (2024), Center for the Study of Childcare Employment, <https://cscce.berkeley.edu/workforce-index-2024/states/new-york/> (last accessed April 24, 2026).

experienced staffing shortages.¹⁶ As staffing shortages continue to expand, inversely, so are the demands for child care.¹⁷ Concerningly, New York City has fewer child care workers than before the coronavirus pandemic.¹⁸ Therefore, applying broad restrictions to CBCs both stagnates the workforce and creates real, practical, limitations to the City’s plan to expand access to child care.

Conclusion

We thank the City Council for the chance to discuss the experiences of our clients in the context of CBCs. As employment opportunities open up for people across the City, it is important that low-income people of color are not shut out of opportunities because of administrative rigmarole and systemic inequalities.

For more information related to the harmful impacts of ACS’s investigations on low-income people of color and survivors of domestic violence, we invite you to review our report referenced throughout this testimony and attached hereto.

Respectfully submitted,

/s/

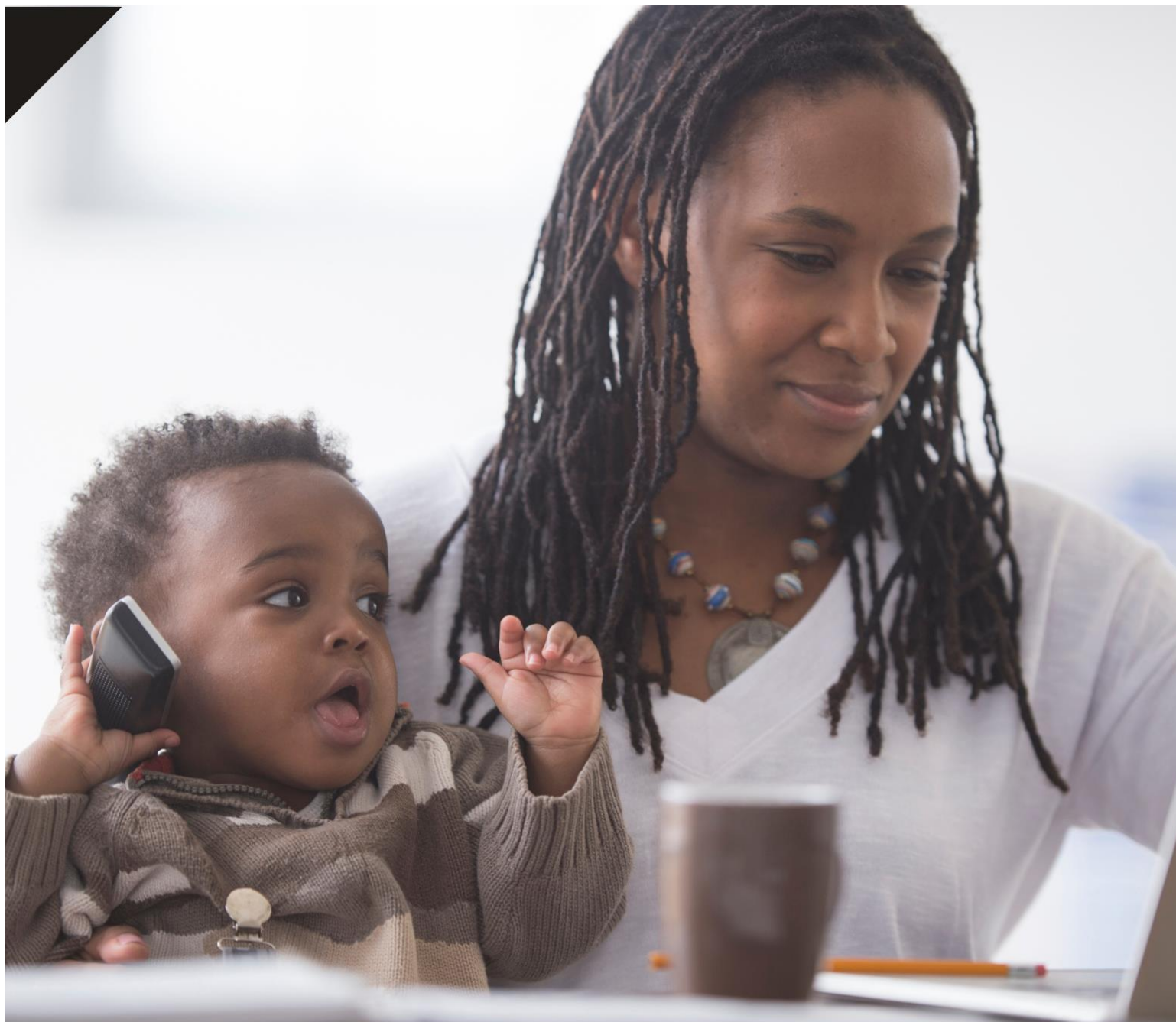
Washcarina Martinez Alonzo, Esq.
Legal Services of NYC | Manhattan Legal Services

E: wmartineزالonzo@lsnyc.org
P : 646-442-3163

¹⁶ *Staffing Shortages Due to Low Wages Are Driving the Child Care Crisis in New York*, Empire State Campaign for Childcare (March 2022), available at: <https://scaany.org/wp-content/uploads/2023/03/Low-Wages-Driving-Child-Care-Crisis-Press-Release-3-22.pdf> (last accessed April 24, 2026).

¹⁷ *Childcare in NY Challenged by Staff Shortages, High Prices and Too Few Slots*, Office of the NYS Comptroller (February 6, 2025), available at: <https://www.osc.ny.gov/press/releases/2025/02/child-care-ny-challenged-staff-shortages-high-prices-and-too-few-slots> (last accessed, April 24, 2026).

¹⁸ *Id.*



The Far-Reaching Impact of ACS's Discriminatory Investigations on Women of Color and Survivors of Gender-Based Violence

An Advocacy Report

by Washcarina Martinez Alonzo Esq., and Caitlin Goldman, Esq., and C.C.

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About Manhattan Legal Services' Economic Justice Work

Manhattan Legal Services, a program of Legal Services NYC, is committed to the pursuit of economic justice for our clients and the communities that we serve. Our Economic Justice Unit works to remove barriers to equal economic opportunity and increase access to income for our clients, while also challenging the systems and structures that are designed to oppress our clients and keep people in poverty. To this end, the Economic Justice Unit has projects dedicated to worker's rights, barriers to employment, unemployment insurance advocacy, consumer rights, and small businesses and community economic development.

Our Workers' Rights Project enforces the rights of low-wage workers, helps low-income workers earn a living wage, and prevents employers from discriminating against and taking advantage of vulnerable workers. We represent clients with issues related to wage theft, employment discrimination, medical and family leave, and workplace retaliation. We also have a project dedicated to providing legal assistance to domestic workers in New York City.

Our Barriers to Employment Project aims to address discrimination and resulting unemployment that disproportionately impacts low-income communities by helping to remove barriers to employment for low-income New Yorkers. We represent clients who are having trouble getting or keeping jobs because of a criminal/arrest history or an indicated report on the New York State Central Register (SCR).

EXECUTIVE SUMMARY

The family regulation system harms low-income communities, especially Black and Brown families. One of these harms is that family regulation creates barriers to employment which exacerbate disparities that keep low-income care workers trapped in a cycle of poverty. In New York State, the State's Central Register serves as a database which holds the names of people who have been found "indicated" of having committed child abuse or maltreatment (neglect). Employers, predominantly those of care workers, then use this database as a means to deny employment.

Given the detrimental consequences of these indicated reports on people's civil liberties and economic access, the Economic Justice Unit at Manhattan Legal Services made a Freedom of Information Request (FOIL) to New York City's Administration for Children's Services (ACS) to determine the extent and impact that its reporting and investigations are having on low-income communities of color.

The FOIL data revealed a disturbing image of ACS's discriminatory targeting of low-income people of color and survivors of gender-based violence.

Some of the key findings in this report show that:

- ACS disproportionately targets low-income communities of color. While only 48% of NYC's population identifies as Black or Hispanic¹, they comprise 81% of ACS investigations and 83% of indicated reports in NYC.
- Community districts with high poverty rates have experienced substantially higher levels of family policing.
- Survivors of domestic violence are over represented in ACS investigations, with 28% of all ACS investigations in the months between January 1, 2020 and July 31, 2022 flagged for domestic violence.

While being overrepresented in the State Central Register, Black and Hispanic women are also the primary demographic who help care for the most vulnerable New Yorkers, comprising more than 50% of all of the City's careworkers. As a result, not only are Black and Hispanic women more likely to be investigated by ACS and thus "indicated" (meaning ACS believes it has found a preponderance of evidence to support the claim that a child has been abused or maltreated), they are more likely to experience barriers to employment as a result. Indicated reports are disproportionately keeping New Yorkers from the very carework positions that help keeps families economically afloat and off the State Central Register.

To address some of the harms caused by ACS's discriminatory investigations, advocates support greater transparency in both reporting and investigations. Currently, there is proposed legislation in New York to end the anonymous reporting of alleged child maltreatment and to require child protective services' workers to advise parents of their rights at the start of a child welfare investigation.

INTRODUCTION

In New York, the State Central Register (SCR) operates a hotline through which anyone can report alleged child abuse or neglect. From there, any report that the hotline operator believes “could reasonably constitute” actual child abuse or neglect if true, is referred to the Administration for Children’s Services (ACS) for investigation.² Despite the very low burden of proof required to initiate an investigation, the process has severe consequences on the civil liberties and economic well-being of the families that are investigated. ACS investigators will frequently visit a family’s home unannounced, show up to children’s schools and interview the children and their teachers, and/or dig up medical and mental health records.³

Once ACS completes their investigation, the report is either “indicated” or “unfounded.” When ACS indicates report, it means that ACS believes there is a preponderance of evidence to support an abuse or neglect claim. According to data uncovered by Manhattan Legal Services in FOIL request, ACS indicated one-third of all investigations between January 1, 2020 and July 31, 2022.⁴ However, of all children in investigations between January 1, 2020 and July 31, 2022, ACS only sought judicial intervention through filing an abuse or neglect petition (Article 10) for approximately 8%.⁵ In fact, the overwhelming majority of indicated reports involve allegations that stem from poverty. In 2022, for example, more than 70% of indicated reports were categorized as neglect.⁶ Neglect,

as defined by ACS, includes lack of medical care, inadequate food/clothing/shelter, inadequate guardianship, lack of supervision, malnutrition, and failure to thrive.⁷ In other words, much of what ACS categorizes as neglect, involves a parent’s capacity to provide for their child.

Indicated reports for neglect remain on the SCR for eight years, while indicated reports for abuse remain on the SCR for up to twenty-eight years.⁸ Individuals with indicated reports are often barred from jobs such as care work, teaching positions, and social service jobs.⁹ Even when indicated reports are not a bar to employment, many employers will use indicated reports as a reason to deny employment. Indicated reports can severely limit a parent’s access to income for a minimum of eight years, perpetuating the cycle of poverty. This barrier to employment predominantly impacts care workers who are mostly women and who, “relative to non-care workers, New York City’s care workers are less likely to be white, to have attended college, or to have been born in the United States.”¹⁰ In 2021, for instance, 89% of NYC care workers were women; only 13% were White, while 26% were Hispanic and 27% were Black.¹¹ Together, this shows that the women who are more likely to be targeted by ACS for investigation are also more likely to face harsh economic consequences of those investigations and any resulting indicated reports.

Women of color, who are more likely to be targeted by ACS for investigation, are also more likely to face harsh economic consequences of those investigations and any resulting indicated reports.

This report offers research on ACS’s practices through statistical analyses and mapping which paint a disturbing image of ACS’ discriminatory targeting of low-income communities of color and survivors of gender-based violence. We did so by analyzing ACS produced data related to investigations closed between January 1, 2020

and July 31, 2022, during when ACS conducted 114,602 investigations, of which 38,182 (or 33%) were indicated. We sought to understand who comprised the 114,602 investigations, who initiated the investigations, and reasons reports were indicated.



TARGETS OF ACS INVESTIGATIONS

Low-Income Communities of Color

ACS disproportionately investigates low-income communities of color. As shown in Figure 1,¹² while 31% of the NYC population identifies as White, they comprise only 9% of subjects investigated by ACS. On the other hand, while 48% of NYC’s population identifies as African American or Hispanic, they comprise 81% of ACS investigation subjects in NYC.

A similar discrepancy can be seen in the data on indicated reports. As seen in Figure 2,¹³ of all indicated reports in NYC, 83% are for African American and Hispanic individuals, while only 9% are for White individuals.

Figure 1
Racial Composition in NYC and among Investigations

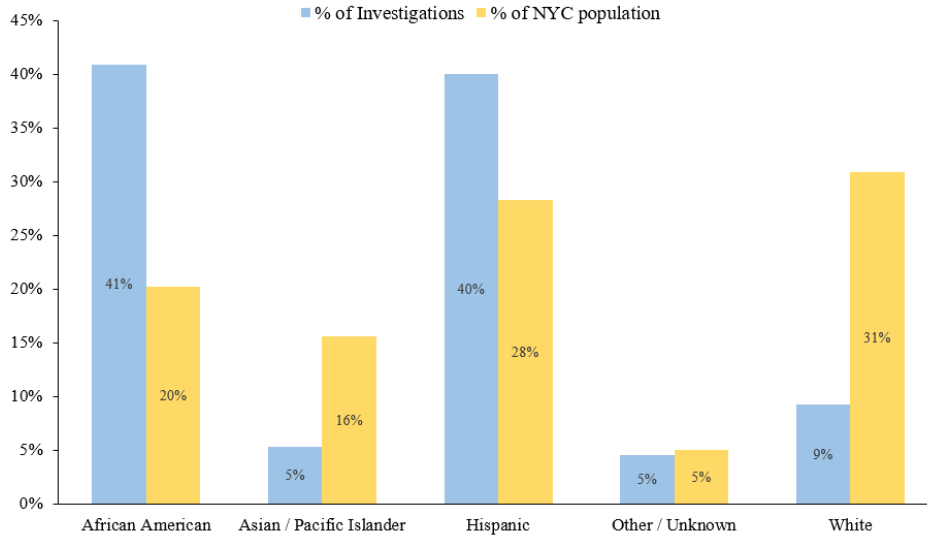
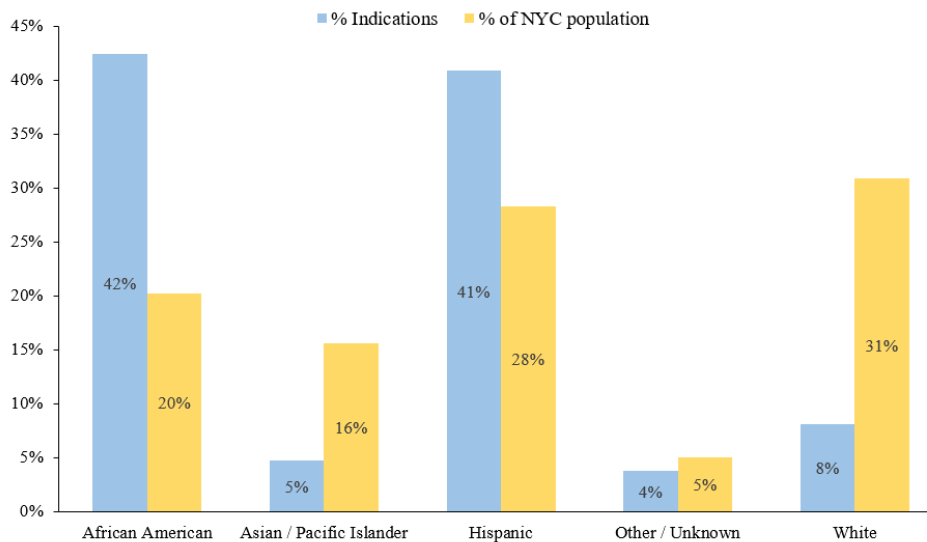


Figure 2
Racial Composition in NYC and among Indications



Not only does the data show that ACS investigations target predominantly Black and Hispanic families, the data also shows these same investigations occur most among areas with the highest poverty rates. To this end, the data in Figure 3 reveals a strong correlation between a community's poverty rate and the number of investigations that ACS conducts in that community.¹⁴ ACS has conducted an average of 13 investigations per 1,000 people in NYC.¹⁵ Community districts with high poverty rates have experienced substantially more investigations. For example, the district of Brownsville has a 39% poverty rate and has been subjected to over 31 investigations per

1,000 people. **That is more than 2.5 times the city average.** Similarly, East Harlem has a 38% poverty rate and has been subjected to over 24 investigations per 1,000 people, twice the city average.

Inversely, community districts with the lowest poverty rates have experienced substantially fewer investigations. For example, the district of Greenwich Village has a poverty rate of 7.1% and was subjected to only 3 investigations per 1,000 people. **That is one quarter of the city's average, and less than 10 percent of the investigations per person in Brownsville.**

Figure 3
Investigations and Poverty Rate in the Districts with the Lowest and Highest Poverty Rates in NYC

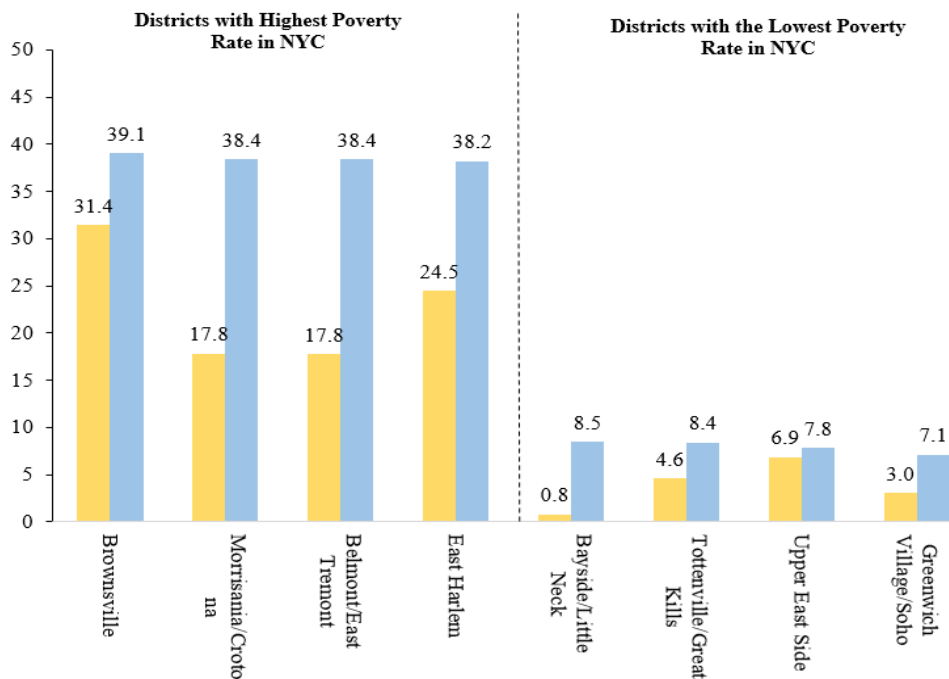
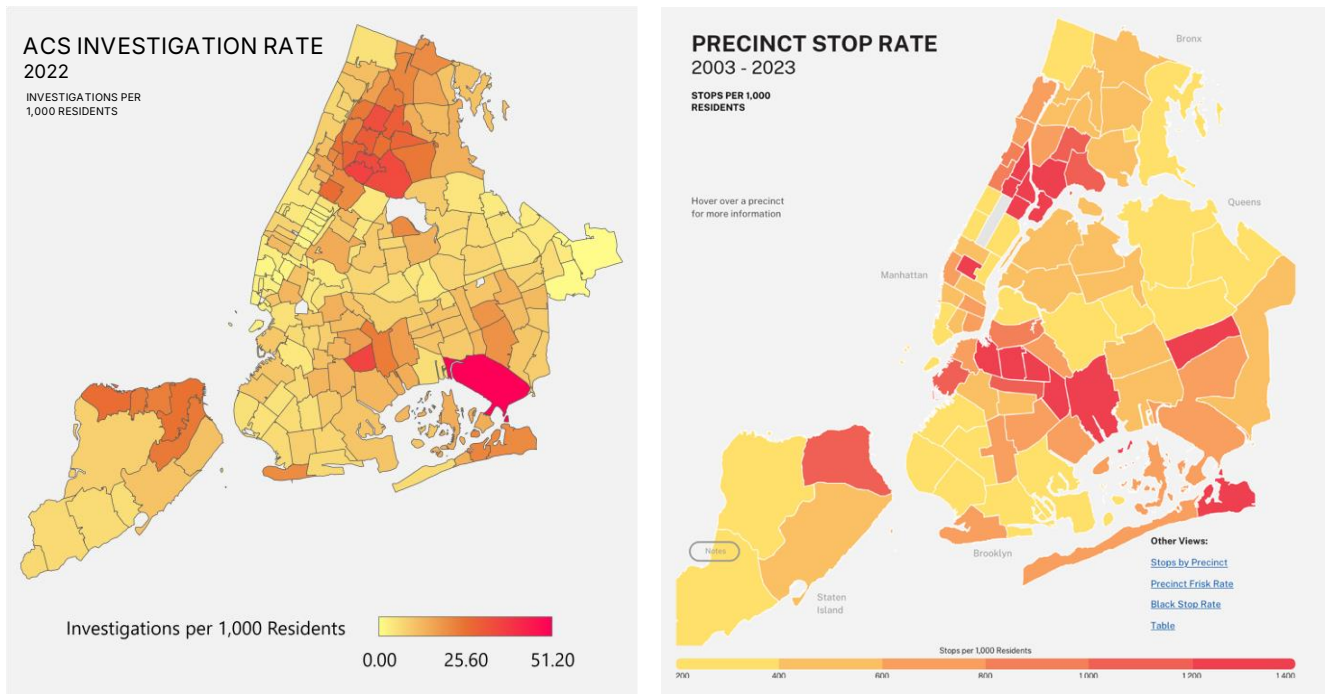


Figure 4: Mapping of Rate of ACS Investigations in Contrast to Rate of Stops



While public discourse has recognized that stop and frisk discriminatorily targets Black and Hispanic communities, those same communities are still being targeted by ACS. As the maps above highlight,¹⁶ the communities that ACS targets are the same communities that have been historically over-policed through stop and frisk. We see similar over-policing in areas such as Harlem, the Bronx, North Staten Island, East Brooklyn, and South Queens.¹⁷ Understanding

that many ACS investigations involve poverty in the form of, for example, a lack of medical care, inadequate food/clothing/shelter, or malnutrition (i.e. neglect), the above data demonstrates the unfair targeting of low-income communities of color. This disproportionality keeps people from attaining meaningful work, perpetuating the circumstances that may have brought about the investigation in the first place.



Survivors of Gender-Based Violence

ACS also disproportionately investigates survivors of domestic violence. Twenty-eight percent of all ACS investigations in the two and a half years after January 1, 2020 were flagged for domestic violence, for a total of 31,849 investigations with a DV flag during this period. For context, in 2021, the New York State Division of Criminal Justice Services (DCJS) reported a total of 34,927 survivors of domestic violence in New York City.¹⁸ In 2022, DCJS reported a total of 39,224 survivors of domestic violence in New York City.¹⁹ This drastic over representation highlights that domestic violence survivors are likely being investigated for reasons associated to the domestic violence they experienced, including after they have reported the domestic abuse they are suffering.

This practice is especially harmful to women of color since they are disproportionately impacted by gender-based violence. In 2021, NYC residents who identified as female were 2.4 times more likely than male residents to report an intimate partner violence (IPV) incident, and Black female residents 6.1 times more likely than White female residents to report an IPV felony assault.²⁰

Low-income communities in NYC are also disproportionately impacted by domestic and gender-based violence. Data shows that a significant number of domestic and gender-based violence incidents in New York City occur in communities with high rates of poverty, low median household income, and high rates of unemployment.²¹ For example, in Manhattan, Community District 11 (East Harlem) has the

28% of all ACS investigations between January 1, 2020 and July 31, 2022 were flagged for domestic violence.

highest poverty rate (31.2 percent) and Community District 2 (Greenwich Village and Soho) has the lowest poverty rate (7.8 percent).²² In 2021, East Harlem had more than five times the number of intimate partner domestic incident reports (DIRs) per person as compared to Greenwich Village/SoHo.²³

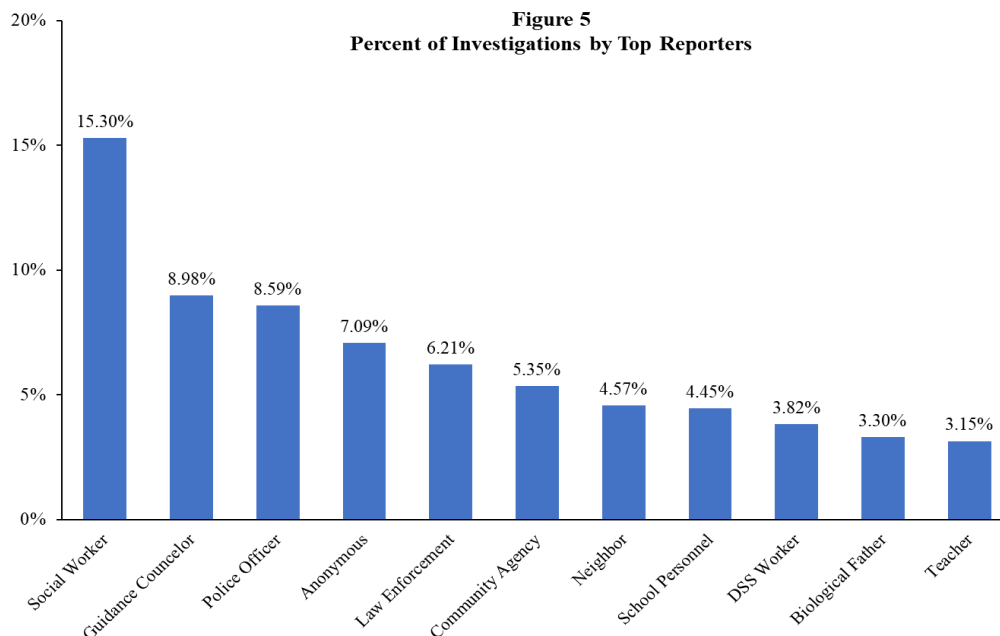
The harsh economic consequences of an indicated report are especially harmful to survivors of domestic violence. According to the National Network to End Domestic Violence, economic abuse occurs in 99% of domestic violence cases. Additionally, abuse directly impacts survivors' ability to find and keep employment. According to a survey by the Institute for Women's Policy Research, 83% of survivors surveyed reported that their abusive partners disrupted their ability to work.²⁴ Among those who reported experiencing one or more disruptions, 70% said they were not able to have a job when they wanted or needed one and 53% said they lost a job because of the abuse.²⁵ We know this first hand as we have many clients with indicated reports associated to domestic violence who are subsequently at risk of losing employment, inhibiting their capacity to escape abuse and provide for their children. Over-investigation by ACS thus only serves to create additional barriers to financial stability for survivors of gender-based violence, which can lead to greater risk of harm.

Abuse can directly impact survivors' ability to find and keep employment. According to a survey by the Institute for Women's Policy Research, 83% of survivors surveyed reported that their abusive partners disrupted their ability to work.

ARBITRARY REPORTING STANDARDS

The State Central Register's (SCR) current reporting system and its lack of transparency facilitate the over-policing of low-income communities of color and survivors of domestic violence in particular.

Figure 5 highlights the percent of investigations by top reporters.²⁶ The data is illustrative for many reasons.



Note: top reporters are those categories that have reported more than 3% of all investigations.

First, over 7% of investigations in NYC stem from an anonymous report. Any reported allegations that the hotline operator believes “could reasonably constitute” actual child abuse or neglect if true is referred to ACS for investigation.²⁷ This standard provides discretion to hotline workers to refer reports for investigation based on very limited information and without having ever met the alleged subjects of the report or the reporter. Most calls to child protective hotlines do not end up being verifiable neglect. Some of the limited data available in varying local systems shows that anonymous reporting has an even lower substantiation rates than an average call.

For NY State in 2022, only 8% of child neglect reports made anonymously were found credible, compared with roughly 21% of all calls.²⁸ Given the far-reaching consequences of ACS investigations and the limited amount of information required to initiate an investigation, the lack of transparency in reporting may be exploited by abusers to harass survivors, as some survivors have already experienced.²⁹

Second, school personnel (comprising teachers, guidance counselors, etc.) initiate the highest number of investigations. This over-policing of the educational space can negatively impact a

families' motivation to attend school, and a child's sense of belonging and safety at school.

Finally, law enforcement officials initiate the second highest number of ACS investigations. According to a 2021 survey of survivors' experiences with law enforcement conducted by the National Domestic Violence Hotline, 21% feared police would threaten them or report them to Child Protective Services. Police called CPS in 15% of cases of those who responded to the survey.³⁰ Considering that 28% of ACS investigations are linked to domestic violence, this national data highlights that many survivors are being investigated by ACS for being

survivors of abuse themselves. This data further points to the overlap in the over-policing of Black and Hispanic communities by both the criminal legal system and the family regulation system.

For NY State in 2022, only 8% of child neglect reports made anonymously were found credible, compared with roughly 21% of all calls.



CONCLUSION

Taken as a whole, the data reveals how the family regulation system in New York City disproportionately harms low-income families of color, who are more likely to be investigated and indicated by ACS. Similarly, survivors of gender-based violence, of which a majority are women of color, are disproportionately investigated by ACS through a system that is riddled with transparency issues. Low-income women of color are also more likely to experience serious economic harm as a result of the family regulation system, facing heightened barriers to employment and access to income. The system thus operates to punish already vulnerable communities for their very state of vulnerability, while simultaneously further entrenching them into poverty.

Meaningful, transformative changes to the family regulation system are essential to achieving racial and economic justice. To address some of the harms caused by family regulation, advocates in this space are currently pushing for greater transparency in both reporting and investigations.

In the context of reporting, Representative Jabari Brisport introduced the Anti-Harassment in Reporting Bill (also known as the Confidential Reporting Bill, NY State Senate Bill S902B), which would end the anonymous reporting of alleged child maltreatment by requiring all reporters to identify themselves, thereby deterring false and/or malicious reporting.

In the context of investigations, Representative Brisport also introduced the Family Miranda Rights Act (NY State Senate Bill S901A), which would require workers to advise parents of their rights at the start of a child welfare investigation. This piece of legislation would ensure that parents are aware of the rights already guaranteed by New York State law and the Constitution, such as the right to remain silent, speak to an attorney, or not permit entry into their home.

ENDNOTES

- ¹ This report uses Hispanic throughout to mirror the language of the demographic data that is analyzed within the report.
- ² Burrell, Michelle. "What Can the Child Welfare System Learn in the Wake of the Floyd Decision?: A Comparison of Stop-And-Frisk Policing and Child Welfare Investigations." *Cuny L. Rev.* 22 (2019), at p. 130.
- ³ *Id.*, at p. 131.
- ⁴ FOIL data, at p. 1
- ⁵ *Id.* at 6.
- ⁶ NYC Administration for Children's Services, "Child Welfare Indicators Annual Report CY 2022," at p. 14, available at <https://www.nyc.gov/assets/acs/pdf/data-analysis/2022/CityCouncilReportCY2022.pdf> (last accessed December 30, 2024).
- ⁷ *Id.*
- ⁸ Prior to 2022, indicated reports for neglect and abuse could remain on the State Central Register for up to 28 years. Reforms passed in 2022 also increased heightened the "some credible evidence" standard to a "preponderance of evidence," and reduced the number of years it takes to seal a report for neglect to eight years.
- ⁹ N.Y. Soc. Serv. Law § 424-a(1)(a)–(b)(i).
- ¹⁰ NYC Controller, "Spotlight: Care Workers and the New York City Economy," Mar. 21, 2023, available at <https://comptroller.nyc.gov/reports/spotlight-care-workers-and-the-new-york-city-economy/> (last accessed December 30, 2024).
- ¹¹ *Id.*
- ¹² FOIL data, at p. 2; NYC Planning Population FactFinder, available at <https://popfactfinder.planning.nyc.gov/explorer/cities/NYC?censusTopics=%2CmutuallyExclusiveRaceHispanicOrigin&compareTo=1&showCharts=false> (last accessed December 30, 2024).
- ¹³ *Id.*
- ¹⁴ FOIL data, p. 1; NYU's Furman Center New York City Neighborhood Data Profiles, available at <https://furmancenter.org/neighborhoods> (last accessed December 30, 2024).
- ¹⁵ According to the U.S. Census data, the population of NYC in April 2020 was 8,804,199. Since there were 114,602 investigations, this means there were 13 investigations per 1,000 residents. See U.S. Census Bureau, QuickFacts New York city, New York, available at <https://www.census.gov/quickfacts/fact/table/newyorkcitynewyork/PST045223> (last accessed December 30, 2024).
- ¹⁶ FOIL data, p. 1; New York Demographics, "New York Zip Codes by Population (2024)", available at https://www.newyork-demographics.com/zip_codes_by_population (last accessed December 30, 2024); NYCLU ACLU of New York, "A Closer Look at Stop-and-Frisk in NYC," Dec. 12, 2022, available at <https://www.nyclu.org/data/closer-look-stop-and-frisk-nyc> (last accessed December 30, 2024).
- ¹⁷ It is worth noting that given the difference in time range, only the the Investigations Rate map takes gentrification into account. Had the Stop Rate map been limited to 2022, it would likely have even more overlap with the Investigations Rate map.
- ¹⁸ NY State Comptroller, Domestic Violence: Recent Trends in New York, October 2023, available at <https://www.osc.ny.gov/files/reports/pdf/domestic-violence-recent-trends-10-23.pdf> (last accessed December 30, 2024)
- ¹⁹ *Id.*
- ²⁰ NYC Mayor's Office to End Domestic and Gender-Based Violence, "2020-2021: Domestic Violence, Race/Ethnicity and Sex Report," Sept. 2022, available at <https://www.nyc.gov/assets/ocdv/downloads/pdf/2021-Domestic-Violence-Race-Ethnicity-and-Sex-Report.pdf> (last accessed December 30, 2024), at pp. 4-5.

²¹ NYC Mayor’s Office to End Domestic and Gender-Based Violence: 2020-2021: Domestic Violence, Race/Ethnicity and Sex Report, *available at* <https://www.nyc.gov/assets/ocdv/downloads/pdf/2021-Domestic-Violence-Race-Ethnicity-and-Sex-Report.pdf> (last accessed December 30, 2024).

²² NYU’s Furman Center New York City Neighborhood Data Profiles, *available at*: <https://furmancenter.org/neighborhoods/> (last accessed December 30, 2024).

²³ Intimate Partner Violence Snapshots: New York City Community Board Districts, *available at* <https://www.nyc.gov/assets/ocdv/downloads/pdf/2021-community-board-snapshots-ipv.pdf> (last accessed December 30, 2024).

²⁴ Hess, C., & Del Rosario, A. (2018). *Dreams Deferred: A Survey on the Impact of Intimate Partner Violence on Survivors’ Education, Careers, and Economic Security*. Institute for Women’s Policy Research. https://iwpr.org/wp-content/uploads/2020/09/C475_IWPR-Report-Dreams-Deferred.pdf. (last accessed December 30, 2024).

²⁵ *Id.*

²⁶ FOIL data, at p. 7.

²⁷ Burrell, at p. 130.

²⁸ Loudenback, J, *More States Seek To Curb Anonymous CPS Reports Against Parents*, Imprint News, *available at*: <https://imprintnews.org/top-stories/more-states-seek-to-curb-anonymous-cps-reports-against-parents/245884> (last accessed December 30, 2024).

²⁹ *See e.g.* “Shavona Warmington said she got the courage to leave an abusive partner after suffering years of domestic violence and giving birth to a baby girl. But then, she said, a new kind of abuse began: her ex called in allegations to the statewide child abuse registry.” as well as “Another domestic abuse survivor, Dana Hanuszczak, said an anonymous caller to CPS claimed she was doing illicit drugs. When child protective services came to her door, she had just returned from a shift at the hospital where she works.” Hunt, Madison, ‘*Weaponizing’ Calls to CPS Hotline: New York Legislation Would Deter False Reports*, Imprint News, *available at* <https://imprintnews.org/child-welfare-2/new-york-bill-false-hotline-reports/65267> (last accessed December 30, 2024).

³⁰ Goodmark, Leigh, *Law Enforcement Experience Report*, National Domestic Violence Hotline, *available at*: https://www.thehotline.org/wp-content/uploads/media/2022/09/2209-Hotline-LES_FINAL.pdf (last accessed: December 30, 2024).

NYC HOSPITALITY ALLIANCE

April 22, 2026

Testimony of the NYC Hospitality Alliance on Int. 0831-2026, providing leave for bone marrow and living organ donation and establishing a city bone marrow and living organ donor honor roll.

On behalf of the NYC Hospitality Alliance, a nonprofit trade association representing thousands of restaurants, bars, and nightclubs across the five boroughs, we respectfully submit the following testimony.

We appreciate the intent of this proposal to support workers who choose to participate in bone marrow and organ donation – a life saving and commendable act. At the same time, the bill raises a number of serious operational concerns for our industry, particularly for small businesses navigating staffing, scheduling, and compliance across an already complex patchwork of leave laws. These challenges come as the industry is already operating with fewer workers, with employment levels in food services and drinking places down approximately 1.9 percent year-over-year – representing the loss of nearly 8,000 jobs across the city.

As Council considers this proposal, we encourage a more streamlined approach to leave policy. Rather than continuing to layer new, use-specific leave categories, we believe any future amendments should move toward a universal paid time off framework – a single bank of leave that employees can use for any health-related purpose subject to specific conditions.

In practice, this would largely reflect how the system already operates. Employers are typically limited in what they can ask about the reasons for leave, and employees often use time off as a de facto flexible PTO. Adopting a simplified, universal bank would reduce administrative burdens and related costs – such as retraining staff and incurring legal fees to revise and redistribute policies each time the law changes – while also minimizing the risk of inadvertent noncompliance and associated penalties. It would further enhance clarity around workers' rights and employers' responsibilities.

We are not suggesting an increase in the total number of PTO hours, but rather an efficient and streamlined system to determine how those days are structured and administered. We look forward to working with the Council to ensure that any changes are workable, clear, and aligned with the realities of operating a hospitality business in New York City.



To: New York City Council, Committee on Health
Chair, Lynn Schulman

From: Candace S. Hill, Trauma Recovery Center (TRC) Organizational Development
Manager, Just Safe & Scaling Safety

RE: New York City Trauma Recovery Centers

Date: Wednesday, April 22, 2026

It is with great excitement that we provide testimony to elevate the significant impact of Trauma Recovery Centers (TRCs) in helping survivors heal and strengthening community health and safety. A sincere thanks to the New York City Council for your support in funding TRCs and the opportunity to provide testimony in support of continued funding.

The Trauma Recovery Center model works to interrupt the cycle of violence by supporting victims of violence in their journey towards stability and healing. Without support, victims of crime often experience housing and employment instability, substance abuse, mental health challenges, re-victimization, or contact with the justice system. To that end, Just Safe (formerly known as [Alliance for Safety and Justice](#) (ASJ)) has worked to grow the model nationally.

[Just Safe](#) is a national organization that aims to win new safety priorities in states across the country. We bring together diverse crime survivors as part of [Crime Survivors Speak](#) to advance policies that help communities most harmed by violence. Collectively, we are a network of more than 200,000 crime survivors nationally.

Communities need more holistic, culturally sensitive, trauma-informed approaches to serving victims. Trauma Recovery Centers serve *all* victims of violence, especially those from communities most harmed by crime, who are disproportionately underserved. By addressing unresolved trauma, TRCs help stop the cycle of violence and help victims heal.

The Trauma Recovery Center (TRC) [model of care began in 2001 with a single location in San Francisco](#), established to serve hard-to-reach survivors of violence who were unable to access traditional victim services. This model has since expanded significantly, with 56 TRCs now operating across the country. To meet the tremendous, community need for trauma recovery services for traditionally underserved victims of crime, the [National Alliance of Trauma Recovery Centers](#) (NATRC) was founded. NATRC's mission

is to build capacity and provide essential training and technical assistance to TRC staff nationwide.

TRCs deliver comprehensive care to survivors of violent crime who are grappling with physical and psychological trauma and are unlikely to access mental health and social services. By addressing both the visible and invisible wounds of violence, TRCs help victims and communities heal, which is crucial for interrupting the cycle of harm that can perpetuate violence.

Studies have shown that crime survivors who receive services at a TRC are 56 percent more likely to return to work, and sexual assault victims served by a TRC are nearly 70 percent more likely to file a police report. The TRC model costs 34 percent less than a traditional fee for service model, and crime victims saw a more than 40 percent reduction in their symptoms of PTSD and depression following TRC services.

Sustained funding for Trauma Recovery Centers is vital to disrupting the cycle of violence through healing those most impacted by it. We sincerely appreciate your support and respectfully request your continued commitment to funding all existing Trauma Recovery Centers in the 2027 and future city budgets. Furthermore, we ask that you support the establishment of additional trauma recovery centers to [scale up safety](#) and adequately [meet the needs of all survivors of violence](#).

Sincerely,

Candace S. Hill
Trauma Recovery Center Organizational Development Manager
JustSafe & Scaling Safety
cwilliams@safeandjust.org
(216) 694-0799

Subhash Kateel
Director of Advocacy
JustSafe & Scaling Safety
subhash@safeandjust.org



Legislative Affairs
125 Broad Street, 19th Floor
New York, NY 10004
212-607-3300
www.nyclu.org

**Testimony of the New York Civil Liberties Union
Before the New York City Council Committees on Children and Youth,
Mental Health and Substance Use, and Oversight and Investigations
Regarding Intros. 660 and 450**

April 21, 2026

The New York Civil Liberties Union (NYCLU) respectfully submits the following testimony before the Committees on Children and Youth, Mental Health and Substance Use, and Oversight and Investigations.

The NYCLU advances civil rights and civil liberties so that all New Yorkers can live with dignity, liberty, justice, and equality. Founded in 1951 as the state affiliate of the national ACLU, we marshal an expert mix of litigation, policy advocacy, field organizing, and strategic communications. Informed by the insights of our communities and coalitions and powered by 90,000 member-donors, we work across complex issues to create more justice and liberty for more people.

Intros. 660 and 450 implicate core areas of the NYCLU’s work, including supporting young people, creating meaningful alternatives to incarceration and our overreliance on policing, protecting constitutionally protected speech, and advancing privacy rights and protections against surveillance. The NYCLU has deep concerns with these two proposed measures, and we encourage the committees to reject them.

Intro. 660

Divesting from punitive systems and protecting individuals from surveillance have long been priorities for the NYCLU — advocating for alternatives to incarceration as well as bans on the non-consensual recording of phone calls between people detained in New York City jails and their loved ones and biometric surveillance.

Young people should be treated as young people, with the support and services that allow them to grow and thrive. Neurological research shows that young people’s minds are still developing well into their twenties.¹ This includes the prefrontal cortex, which is responsible for decision-making and impulse control. Yet, too often, our country’s overreliance on punitive solutions to conflict leads to policies that punish youth rather than providing them with spaces where conflict can be addressed safely and constructively. For this reason, the NYCLU

¹ Ellen Barlow, *Under the Hood of the Adolescent Brain*, HARVARD MED. SCH. (Oct. 17, 2014), <https://hms.harvard.edu/news/under-hood-adolescent-brain>.

strongly opposes Intro. 660, which would force providers of critical youth services to surveil the young people they work with rather than focus on developing the trusting relationships that are the foundation for impactful youth programs. The NYCLU urges the committees to reject Intro. 660.

Intro. 660 would significantly expand surveillance of young people by requiring all programs funded by the Department of Youth and Community Development (DYCD) to report on in-person verbal or physical altercations involving youth under 24, detail the reasons for those altercations, examine related online activity, and report whether an agency responded. This would impact hundreds of thousands of young people, as DYCD funds afterschool programs, Summer Youth Employment Program, the Crisis Management System, runaway and homeless youth services, employment supports, and more.² Intro. 660 also specifically calls for identifying strategies agencies can use to “monitor and identify” young people’s activity on online platforms in order to prevent altercations, as well as strategies to “counsel” youth regarding that activity. In addition, the bill would require a report listing specific altercations, related online activity, and agency response in machine-readable format.

Intro. 660 will diminish the impact of youth programs while raising serious privacy concerns. First, the bill requires online surveillance of young people in DYCD-funded programs, which will shift youth program providers away from their core role as trusted places for mediation, support, and conflict resolution, and toward a monitoring role that is likely to damage relationships between youth and staff. The most effective youth programs are those where staff can develop rapport and trusting relationships with young people. Intro. 660 requires that providers surveil young people’s online activity and look for anything potentially problematic, forcing providers to play a more adversarial role that is most often that of law enforcement officers. Youth will no longer feel as comfortable sharing with providers, diminishing staff’s ability to help them deal with conflict that will inevitably arise. This bill applies only to youth under 24 who attend DYCD-funded programs, meaning this scrutiny will fall on young people already connected to city-funded support systems. Most likely, Intro. 660 will fall hardest on Black and Brown youth who are already subject to heavier surveillance and system contact.

Second, the broad scope of the bill, including both “verbal or physical altercations” and “relevant” online activity would result in expansive surveillance. This would result in ordinary youth conflict, or reactive behavior receiving scrutiny instead of support. In many ways, this bill would create a new surveillance database of our youth that in effect could become a new iteration of the gang database. As demonstrated by the NYPD gang database, once a young person is labeled as violent, even based on weak or circumstantial behavior, the consequences can be severe. This label can follow a young person around for years and can affect policing,

² According to DYCD’s own website, it served a record 343,673 young people and 80,066 adults in Fiscal Year 2023. DYCD History, THE DEP’T OF YOUTH & CMTY. DEV., <https://www.nyc.gov/site/dycd/about/about-dycd/history.page> (last visited April 20, 2026).

school discipline, criminal cases, housing, and immigration outcomes. At the same time, surveillance through tools like the gang database does little to actually address violent crime.³

The bill also fails to appropriately protect young people’s privacy rights. It does not call for a general review of trends alone; it requires incident-level reporting on specific altercations, related online activity, and agency response, all in machine-readable form. Although the bill states the report should not violate existing privacy laws, it does not take any proactive steps to protect young people from having personally identifiable information released. Indeed, it is difficult to see how DYCD would report on the “details of the altercation” and “details of any relevant activity on online platforms by youth that led to the altercation” without providing identifiable information.

Finally, although this bill is framed as a study and report, it lays the groundwork for future monitoring practices by asking the City to develop strategies for identifying and tracking online activity in the name of prevention.

The NYCLU urges you to commit to approaches to youth conflict that strengthen community programs as places for prevention, conflict resolution, and care by **opposing Intro. 660**.

Intro. 450

The NYCLU also has deep concerns with Intro. 450. While we appreciate the Council’s intent to address potential negative impacts of social media on young people’s well-being, Intro. 450 sweeps with far too broad a brush and raises First Amendment concerns.

Age verification requirements have been viewed with increasing skepticism from courts, who have begun recognizing that such practices can burden the First Amendment rights of those who wish to use social media anonymously, deter lawful users who can’t or won’t turn over personal information, burden the First Amendment rights of young people, and generally raise significant privacy concerns. In practice, under this proposal, social media companies would be forced to require *everyone* in New York City to prove their age in order to use social media for more than an hour per day. This means that adults who cannot prove their age will be shut out of these platforms, which could constitute an unconstitutional burden on their right to receive constitutionally protected speech. And while we understand the Council’s concerns with addressing harms from social media for young people, we note that this sweeping approach fails to adequately consider the informational benefits of social media for young people looking to build community, forge friendships, and access useful – even necessary – health information and emotional support.

The proposed content restrictions on targeted content are similarly overbroad, encompassing not just commercial speech, but a much broader range of suggested content. And again, coupled with the age verification requirements, this could result in overbroad content

³ Sandhya Kajeepeta, *What happens when you erase a gang database?*, NAACP LEGAL DEF. FUND (Dec. 13, 2024), <https://naacpldf.org/what-happens-when-you-erase-a-gang-database/>.

restrictions for adults who cannot satisfy the age verification requirements. While well-intended, we urge the Council to **reject Intro. 450** given the serious constitutional questions its approach raises.

The NYCLU thanks the committees for the opportunity to provide testimony, and we welcome the opportunity to continue to work with the Council on these and other measures.



TESTIMONY: UJA-FEDERATION OF NEW YORK

Oversight-Child Care Program Background Checks

**New York City Council Subcommittee on Early Childhood Education
Honorable Jennifer Gutiérrez, Chair**

**New York City Council Committee on Health
Honorable Lynn Schulman, Chair**

**New York City Council Committee on Oversight and Investigations
Honorable Shekar Krishnan, Chair**

**Submitted by:
Faith Behum, UJA-Federation of New York**

April 22, 2026

Thank you, Chairpersons Gutiérrez, Schulman, Krishnan and the members of the Committees on Health and Oversight and Investigations and members of the subcommittee on Early Childhood Education for holding this oversight hearing and for the opportunity to submit testimony. My name is Faith Behum, and I am the Manager of Government and External Relations at UJA-Federation of New York.

Established more than 100 years ago, UJA-Federation of New York is one of the nation's largest local philanthropies. Central to UJA's mission is to care for those in need—identifying and meeting the needs of New Yorkers of all backgrounds and Jews everywhere. UJA supports an expansive network of nearly 100 nonprofit organizations serving the most vulnerable and allocates nearly \$200 million annually to address poverty and food insecurity, nurture mental health and well-being, strengthen Jewish life, and respond to crises across New York City, Westchester, and Long Island.

Staffing is one of the main components that children and youth programs require to be successful. Specifically, Community Based Organizations (CBOs) need to not only recruit staff to work in their programs, but they also need to hire these individuals in a timely manner. Part of the hiring process for CBOs operating under School-age Child Care (SACC) licenses requires staff to undergo comprehensive background checks (CBCs). Potential candidates for early childhood education programs overseen by the Department of Education must undergo background checks through the Personnel Eligibility Tracking System (PETS). Both the CBC and PETS systems present various challenges to providers who interact with them.

The CBC system transferred to an online system to submit background checks in May 2023. The ability to upload documents to an online platform instead of emailing them was a welcome change. Being able to check the status of applications online has been incredibly helpful to providers. It currently takes up to three weeks for comprehensive background checks to be completed-much less time than the months providers used to have to wait. The online system also provides provisional approval immediately meaning an employee is allowed to work with a child if they are supervised by a CBC cleared employee. However, providers still struggle to get potential employees who lived out of state cleared through the system in a timely manner.

For the PETS, the wait time to get a fingerprinting appointment, a crucial step in the process, is manageable with many providers saying that individuals can get appointments within the week they are requested with results released approximately a week later. Issues arise when individuals need to undergo review by the Office of Personnel Investigation (OPI). Due to confidentiality issues, OPI will only discuss the status of an investigation with the individual involved. Providers have said that OPI is difficult to connect with prompting individuals to call continuously or even go to the OPI office in person to receive an update on their case. OPI only sends emails on the status of the investigation if it is requested by the person being reviewed. When an investigation is finished, the individual is contacted if they are cleared while this information is not updated immediately in PETS to reflect this change. Oppositely, when an employee is rejected, a reason is not provided meaning there is no way to attempt to counter the rejection. In some instances, individuals are never cleared through OPI and no reason is given causing providers to rescind employment offers.

The comprehensive background check process for SACC licensed programs has improved significantly since its restructuring in 2019. The transition to an online system is the main reason the CBCs are being processed more efficiently. This combined with the Department of Health and Mental Hygiene having adequate staff to oversee the CBC system is essential to its success. The PETS, when the OPI is involved in a clearance, continues to be a challenging system to navigate. The DOE must ensure that PETS has the staff they require to address the volume of clearances they need to process. Communication between the person being cleared, the employer and the PETS/OPI needs to be improved. Individuals undergoing a background check should receive timely updates on the process. Specifically, the employer and individual should be notified immediately if there is any delay. This can be done in a way that details about the reason of the delay are not shared with the employer, maintaining the privacy of the person undergoing the background check. The PETS must also allow employers and individuals to check the status of a background check online (similar to the CBC system). Status, including a general reason why a person was not cleared, must also be made available.

Providers have always supported rigorous background checks for their staff. They need their partners in government to continue to process background checks quickly and efficiently in order to maintain the high level of services they provide. If you have any questions, please contact me at behumf@ujafedny.org. Thank you.



**Presentation to the Subcommittee on Early Childhood Education joint with Workforce Development
and Higher Education
Karen Tingley, Vice President, Education, Zoos & Aquarium
Wildlife Conservation Society
April 15, 2026**

Good afternoon, and thank you for the opportunity to testify.

My name is Karen Tingley, and I serve as Vice President of Education at the Wildlife Conservation Society, where we reach over 3.5 million New Yorkers each year across our zoos and aquarium.

I'm here to speak about the importance of high-quality science learning opportunities in early childhood and the role that cultural institutions can play in delivering them.

For the past three years, we have led STEM Starters, a partnership with NYC Public Schools that brings science learning into Pre-K classrooms. What makes this work powerful is not just the experiences for children, but the sustained investment in teachers and their classrooms.

Through ongoing professional development, co-designed curriculum, and classroom-ready science kits, we've seen measurable impact. Using Teaching Strategies GOLD, our evaluation shows gains in students' use of scientific tools, persistence in problem-solving, and early language and literacy development. These are foundational skills that extend far beyond science.

This is the point: early exposure to science is not about content alone. It builds identity. When young children see themselves as curious, capable investigators of the world, it shapes their confidence, their interests, and their academic pathways for years to come.

At WCS, we are not only educators in early childhood, we are also a leading provider of workforce development for young people ages 14 to 25 across New York City. Through paid internships, career exploration, and hands-on training in science, conservation, and education, we are actively building the next generation of talent.

With the support of the City Council, WCS has expanded its STEM Career Lattice, a tiered workforce development model that provides youth ages 14 to 24 with paid opportunities and clear career pathways. Each year, participating youth collectively earn approximately \$5.5 million dollars while gaining valuable professional experience. The program currently serves more than 1,900 young people, with strong participation from those underrepresented in STEM fields.



WCS also led the creation of SCI Network NYC, a collaboration of 8 science-based cultural institutions. With City Council support, this network provided 1,141 interns across more than 60 types of internships in fields such as animal care, horticulture, science research, education, and conservation advocacy, earning more than \$2.4 million in stipends.

What we see through these programs is just as important as the numbers. Many of the young people we serve are encountering these opportunities for the first time as teenagers. They are capable, motivated, and eager, but they are also catching up on exposure and access they should have had much earlier.

That is exactly the point. We are proving that the talent is already there across every community. But if we want to build a stronger, more prepared, and more equitable workforce pipeline, we cannot wait until age 14 to start investing.

This is also where workforce development begins. If we are serious about building a diverse, skilled future workforce in science, healthcare, education, and environmental fields, we cannot wait until high school or college. Early childhood is where interests are formed, where confidence is built, and where pathways begin, especially for children from communities that have historically been excluded from STEM opportunities.

But this doesn't happen by accident. It requires quality programming and prepared educators. Too often, early childhood teachers are asked to teach without the training, materials, or support to do it well. When we invest in teachers, not just through one-time workshops, but through sustained, practice-based professional learning and school partnerships, we see real shifts in both teaching and student outcomes.

Right now, too many young people are being asked to discover these pathways late. We have the opportunity to change that.

We also know this work is bigger than any one institution. Across New York City, science-based cultural institutions including the New York Botanical Garden, American Museum of Natural History, New York Hall of Science, Brooklyn Botanic Garden, Staten Island Zoo, and Wave Hill are actively engaging young children, supporting educators, and partnering with schools and community organizations.

However, this work requires public investment to scale and sustain. With the right support, we can expand access, strengthen teacher capacity, and ensure that high-quality science learning is not limited by zip code, but available to every young child in New York City.

And just as importantly, this investment should not treat cultural institutions as an afterthought. Our track record in workforce development shows what is possible when these institutions are resourced



as core partners. We are already delivering results at scale for teens and young adults—imagine the long-term impact if that same level of investment begins in early childhood.

As New York City continues to expand Pre-K, this is a moment to be intentional. Cultural institutions are not an add-on; they are essential partners in building a high-quality, equitable early childhood system that supports educators, engages families, and lays out the foundation for lifelong learning and career pathways.

Thank you.

Good afternoon, and thank you for the opportunity to testify.

My name is Karen Tingley, and I serve as Vice President of Education at the Wildlife Conservation Society, where we reach over 3.5 million New Yorkers each year across our zoos and aquarium.

I'm here to speak about the importance of high-quality science learning in early childhood and how it connects directly to the workforce pipeline this committee is examining.

For the past three years, we have led STEM Starters, a partnership with NYC Public Schools and our zoos that brings science learning into Pre-K classrooms. What makes this work powerful is not just the experiences for children, but the sustained investment in teachers.

Through ongoing professional development, co-designed curriculum, and classroom-ready science kits, we've seen measurable impact. Using Teaching Strategies GOLD, our evaluation shows gains in students' use of scientific tools, persistence in problem-solving, and early language and literacy development. These are foundational skills that extend far beyond science.

And this is the point - early exposure to science is not about content alone. It builds identity. When young children see themselves as curious, capable investigators of the world, it shapes their confidence and interests for years to come.

At the same time, WCS is one of the City's largest providers of youth workforce development in science and conservation. Through the long-time support of the NYC Council and Speaker, WCS has operated the STEM Career Lattice, a career pathways program that supports 1,900 young people ages 14 to 24 each year in paid internships and career pathways, with youth collectively earning over \$5 million annually.



What we see is consistent: young people are talented and motivated, but many never see themselves in science or education and while thousands encounter these opportunities for the first time as teenagers, many never get there.

That's the disconnect that we have the opportunity to fix.

If we want a stronger, more equitable workforce pipeline, it cannot start at age 14. It must start in early childhood and it should connect all the way through. The same system that builds curiosity and confidence in Pre-K can create pathways for those same young people, years later, to step into roles as educators, STEM professionals and civic leaders. We are already beginning to see this full-circle potential, with youth in our programs exploring early childhood education as a career pathway.

This doesn't happen by accident. It requires quality programming and prepared educators. Too often, early childhood teachers are asked to teach science without the training or materials to do it well. When we invest in sustained, practice-based professional learning, we see real gains in both teaching and student outcomes.

And this work is not happening in isolation. Through SCI Network NYC—a collaboration of eight science-based cultural institutions—we are collectively building both sides of this pipeline: early learning experiences for young children and paid workforce opportunities for youth and young adults. With City Council support, this network has already provided over 1,100 internships across more than 60 roles.

But to truly connect this pipeline—from early childhood through career—we need sustained public investment.

As New York City continues to expand Pre-K, this is a moment to be intentional. Cultural institutions are not an add-on; they are essential partners in building a high-quality early childhood system and a stronger future workforce.

Thank you.



Breaking the Cycle of Homelessness
for Women and their Children

**Testimony of Win for the New York City Council
Subcommittee on Early Childhood Education Oversight Hearing
April 22, 2026**

Thank you to Chair Gutierrez and the esteemed members of the Subcommittee on Early Childhood Education, as well as the Committees for Health and Oversight & Investigations, for the chance to submit testimony on behalf of Win. My name is Maya Jasinska and I'm the Director of Policy and Research at Win, the largest provider of shelter and services to families with children experiencing homelessness in New York City. We operate 16 shelters and nearly 500 supportive housing units across the five boroughs. Each night, nearly 7,000 people call Win "home," including 3,600 children, over 40% of whom are under the age of five. As our recent report found, lack of access to child care is both driving families into, and keeping them in, shelter.¹ Without child care, families cannot seek employment to afford their rent or meet the work requirements for public benefits and/or the cost of child care itself is bankrupting them. Once in shelter, families with young children cannot search for housing or access rental assistance benefits without first connecting with child care. Many of our shelters are in "child care deserts" or areas where there are not enough seats to meet demand. Legislation, such as Intro 15, that enables child care programs to open and operate more easily is key not just to supporting the employment and income stability of Win families, but also their housing stability.

In addition to supporting clients with connecting to external child care programs, Win is proud to offer onsite, drop-in child care at seven of our shelters, with four additional classrooms opening soon. Shelter-based child care programs enable Win parents to search for employment or permanent housing with peace of mind, knowing that their children are safe and well taken care of. Our onsite child care programs are free, operate from 8AM-6PM, and serve two populations for whom it is especially difficult to find affordable child care: children without legal immigration status and/or under the age of two: making these shelter-based child care classrooms a critical resource for Win parents.

¹ Maya Jasinska and Ava Spiner, "Lack of Affordable Child Care is Driving the Family Homelessness Crisis" Win, March 2026. <https://winnyc.org/wp-content/uploads/2026/03/Childcare-Brief-Web-Version.pdf>



Breaking the Cycle of Homelessness
for Women and their Children

However, our success in operating these programs is stymied by the lengthy and costly background check process. While background checks are key to ensuring program quality and safety, obtaining a background check for one new hire takes on average 4-6 months (with one instance even taking as long as 8 months). New hires cannot work until they have clearance. Given how difficult it is to recruit child care workers, we pay new hires while waiting for their background checks to clear, even though they cannot work. Beyond being extremely costly for Win, the delays in background check processing are harmful to the families we serve. Without sufficient staff to comply with mandatory child-to-teacher ratios, Win child care classrooms stand empty and families cannot access the services they need. DOHMH allows some staff waiting for clearance to begin working if they are supervised by a Head Teacher and/or Education Director with full clearance. However, this policy only helps when we are hiring for an opening in an already operational classroom. It does not help us open new child care classrooms faster.

We urge the City Council to pass Intro 15, proposed by Council Member Shaun Abreu, to expedite the lengthy background check process and enable child care classrooms to staff up more quickly and cost-effectively. This legislation would prohibit DOHMH from requiring background checks for child care providers and employees if they have had a background check done in the last five years. There is precedent for this: DOHMH requires fingerprinting to be redone only every five years. Intro 15 would allow our newly hired, experienced staff to begin working immediately. Moreover, combined with the DOHMH policy of "under line of sight" supervision, this legislation would enable us to fully staff up newly permitted classrooms faster, as experienced staff hired into senior positions can oversee new hires who have not had a background check done before. It would also reduce redundant processes for both Win and DOHMH staff; Our Director of Children's Services, who oversees all seven of Win's child care classrooms, had to apply for a separate background check for each site that she supervises.

Intro 15 is a common-sense policy that will enable us to open child care classrooms more efficiently and cost-effectively and put more families on the path to stable housing.

Thank you!

**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: _____

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Name: Corinne Schiff

Address: _____

I represent: NYC Health Department

Address: _____

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I represent: Admin

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I represent: Admin

Address: _____

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Name: Gregory Broadet

Address: _____

I represent: Day Care Council of New York

Address: _____

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**THE COUNCIL
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Name: Joyce McClammy

Address: 125 Bonday Street NY NY 10007

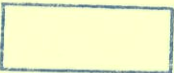
I represent: Executive Board Member, Local 205, DC 37

Address: (Day Care Employees)

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**THE COUNCIL
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Name: PAULA INHARGUE

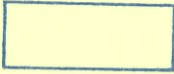
Address: _____

I represent: UNITED NEIGHBORHOOD HOUSES

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

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in favor in opposition

Date: 4/22/26

(PLEASE PRINT)

Name: Beily Appel

Address: _____

I represent: Cuddles Daycare

Address: _____



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