

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

“Oversight – Child Welfare Policy Reforms at the Administration for Children’s Services”

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

**Overview of Child Protective Process and Preventive Services**

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

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

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

### **ACS Child Welfare Reform Efforts**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **3. Improving Collaboration with Other City Agencies**

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

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

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

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

#### **Closing**

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