



Federation of Protestant Welfare Agencies

**Child Welfare Services with Community Coalitions Concept Paper:
Federation of Protestant Welfare Agencies' (FPWA's) Response**

Submitted on March 19, 2008

Dear Commissioner Mattingly:

For 85 years, FPWA has been a leading policy advocate for individuals and families served by our almost 300 member human service agencies and churches in and around New York City. FPWA promotes the social and economic well-being of greater New York's most vulnerable by strengthening human service organizations and advocating for just public policies.

FPWA appreciates the opportunity to offer comments on the New York City Administration for Children's Services' (ACS) "Child Welfare Services with Community Coalitions Concept Paper," released on February 6, 2008. FPWA represents nearly 40 child welfare agencies providing preventive, foster care, and residential care services to children and families in need. Our comments reflect the valuable input of these agencies regarding the impact of the proposed changes on their work, as well as their vision for a stronger, more cohesive child welfare system.

Although providers welcome many of the changes associated with the upcoming Request-for-Proposals (RFP), they are deeply concerned about their ability to implement these changes with such limited resources at their disposal. Agencies believe that ACS' movement towards a family-focused system that is tightly connected to surrounding communities and neighborhoods will lead to stronger, healthier families and safer, more permanent living situations for children. However, **with no new dollars available** to support sophisticated, resource-intensive initiatives like Family Team Conferencing and Community Coalitions, ACS is asking them to do the impossible. **Like ACS, contract agencies want these changes, but they must have the resources and funding necessary to achieve them.** Without this, the laudable principles of the concept paper will never translate into real-life improvements for New York City families.

In addition, we would like to highlight the importance of protecting small and minority-owned service providers. These providers are an integral part of New York City's child welfare system, ensuring that the services offered reflect the needs and cultures of the City's various communities and neighborhoods. It is also these providers who will need the most funding support and technical assistance in order to respond to the RFP and continue operating robust child welfare programs. **It is extremely important for ACS to realize that every resource limitation emphasized in this response will hit our small and minority-run agencies *the hardest*. We must do all we can to make sure that these agencies are prepared to meet the requirements of the RFP.**

We would now like to take the opportunity to issue comments on several aspects of the concept paper.

RFP Process

Although FPWA and its member agencies are thankful for the opportunity to provide input on this concept paper, we are troubled by the fact that the RFP is scheduled to be released just one week after our comments are due. **We urge Commissioner Mattingly to extend the time period before the RFP's release to give ACS staff the time necessary to fully digest and consider our recommendations.**

In addition, agencies raised the following concerns regarding the RFP process:

- Agencies with multiple programs will have a difficult time submitting multiple applications at once. There must be some consideration for this in the RFP process.
- Agencies would appreciate the opportunity to hear ACS' response to comments submitted on the concept paper. Some agencies have heard that although the RFP has not been released, a draft RFP exists, which prevents ACS from answering questions. We sincerely hope that this is not the case and encourage ACS to host a forum where questions and comments on the concept paper can be addressed.
- Agencies need access to community and agency-specific data in order to respond effectively to the RFP. FPWA understands that the Council on Family and Child Caring Agencies (COFCCA) is attempting to pull together this data, and calls on ACS to support this worthy effort.

Staff Recruitment and Retention

Contract agencies providing foster care and/or preventive services in New York City struggle with the same recruitment and retention challenges faced by ACS itself. As was recently highlighted by the media, ACS' child protective services (CPS) division has suffered from an extremely high turnover rate, prompting the agency to launch a \$1 million recruitment effort.¹ Commissioner Mattingly himself noted that the primary reason for high turnover was staff burnout, resulting from the difficult nature of the work and unmanageable caseloads.² In the words of the Commissioner, "[a CPS] caseworker should have to handle *no more than 12* ongoing investigations" (italics added by FPWA).³ We call on New York City to recognize that contract agency caseworkers interact with the same troubled families and complicated cases that confront the CPS division. Likewise, we must show the same concern for these caseworkers as we do for ACS caseworkers. We cannot in good conscience allow overburdened contract agency caseworkers and supervisors to struggle with unmanageable caseloads while taking on increased administrative and clinical responsibilities.

FPWA recommends that ACS lower caseloads across all general preventive services programs to 12:1 and lower foster care caseloads to a ratio of 11-12 children per caseworker (as recommended by the Office of Children and Family Services in its 2006 Child Welfare Workload Study). Specialized preventive programs require even lower caseloads. Agencies must also have the funding necessary to maintain supervisory ratios of 1:5.

With reasonable caseloads in place, caseworkers will have time to build strong relationships with families and resolve crucial child safety issues in an efficient and timely manner. Reduced caseloads are also necessary if caseworkers and supervisors are to successfully accommodate

¹ Kathaleen Lucadamo, "ACS unveils recruitment campaign," *New York Daily News*, March 3, 2008; Marc Santora, "To Recruit Caseworkers, a Dose of Reality," *The New York Times*, March 3, 2008.

² Ibid.

³ Marc Santora, *supra* note 1.

new responsibilities associated with the RFP. For instance, Family Team Conferencing, a featured element of the Improved Outcomes for Children plan (IOC) and the RFP, requires caseworkers and supervisors to meet more frequently with families and community stakeholders as they work to move children more quickly into safe and stable living situations.

In addition, FPWA calls on ACS to provide resources for raising the salaries of contract foster care and preventive services caseworkers to reflect the important role they play in keeping children safe and helping at-risk families. Current salary levels at contract agencies are not competitive, resulting in the loss of qualified candidates, some of whom opt for higher salaries offered by ACS. Without adequate compensation levels, fewer and fewer social workers will enter the field, making it extremely difficult for contract agencies to attract the highly-trained caseworkers needed to carry out the clinical and treatment responsibilities referred to in the RFP.

Flexible Funding Formula

Although foster care agencies appreciate the funding flexibility afforded to them under the RFP, all agencies are deeply concerned that no new money has been added to support new initiatives. **FPWA strongly urges ACS to calculate the REAL costs of implementing the new initiatives incorporated into the RFP and ensure that agencies have the funding they need to support them.** We cannot assume that the savings generated from anticipated reductions in step-ups is enough to fund these initiatives without first calculating the costs.

In addition, agencies remain concerned that the basis of the flexible funding formula—i.e., reductions in step-ups—will present some serious challenges:

- First, *anticipated* reductions in step-ups are difficult to estimate, and agencies that fail to meet their targets will be forced to cover the costs of additional step-ups themselves. This will be very difficult for agencies to accommodate, given the extremely limited resources at their disposal.
- Second, an exaggerated emphasis on reducing step-ups could lead to children being kept in inappropriately low levels of care. Although agencies agree with the premise that family-centered services are better than institutional settings, they are also quick to point out that **there will always be some children who need long-term intensive care in these types of settings.** We must ensure that these children have access to the services that they need.
- Third, in order to understand and use this new funding formula effectively, agencies will need technical assistance from ACS.

Family Team Conferencing

In general, agencies are extremely supportive of Family Team Conferencing and believe that this model will lead to more successful permanency outcomes for children and families. Providers value these conferences for a number of reasons, including: (1) they give family members, youth, and community stakeholders a chance to participate in decision-making, (2) they primarily focus on family strength and building upon a family's assets to ensure child safety, (3) they generate enthusiasm on the part of staff, many of whom are eager to try new methods for engaging families, and (4) they provide for "consensus" decision-making, rather than forcing caseworkers to bear the burden alone.

However, despite these universally agreed upon benefits, FPWA urges ACS to consider the serious resource issues that interfere with an agency's ability to participate in Family Team

Conferencing (FTC). ACS must work with contract agencies to address the following resource limitations:

- Space is a critical issue, as many agencies do not have an adequate number of meeting rooms or other space to devote to these conferences. Although some agencies may be able to secure alternate space arrangements through their participation in Community Coalitions, many will continue to face significant space constraints.
- The FTC model means that already overworked caseworkers must take on additional responsibilities. Conferences can be extremely time-consuming – sometimes taking up to three or four hours – and must often take place in the evenings or on weekends in order to accommodate family and community member schedules. With foster care caseloads running so high and caseworkers overloaded with multiple obligations including permanency hearings and CONNECTIONS reports, agencies are very concerned about staff burnout. With such unmanageable expectations in place, agencies will find it even more difficult to recruit and retain caseworkers.
- Agencies face other FTC-related resource demands, including the need to train conference facilitators and to develop a system for scheduling conferences. The frequency and the large number of participants involved make FTCs extremely difficult to schedule. Agencies may need to obtain additional clerical support in order to take on this responsibility.
- With an increasing number of immigrant families entering the child welfare system, translation services are crucial to the successful operation of conferences involving non-English speaking clients.

Community Coalitions

Agencies strongly believe in the formation of Community Coalitions and the importance of serving families in the neighborhoods and communities in which they live. They are eager to develop cohesive networks of service providers and other stakeholders that build upon local strengths and values and create community-based service systems that support families in need.

However, as with Family Team Conferencing, Community Coalitions require a significant commitment of time, resources, and money. **Agencies cannot sustain this critical work without adequate funding and support. FPWA urges ACS to ensure that agencies receive ongoing funding and technical assistance as they attempt to develop these coalitions. Specific agency concerns and recommendations include the following:**

- Under the Community Partnership Initiative (CPI), coalitions were significantly underfunded, receiving only \$150,000 to support their work. Instead, CPIs relied heavily on contributions of staff and money from member providers, many of whom desperately need to preserve those resources to support their own services. Without greater start-up resources and an on-going source of funding, Community Coalitions will not be viable.
- Funding is particularly needed to cover staffing support for Community Coalitions. Coordinating and facilitating these coalitions requires time, as well as a high level of sophistication and coalition-building expertise. Coalitions must have the funding to attract highly-trained community liaisons who can perform these duties successfully.
- Again, the caseloads for both agency caseworkers and supervisors are an issue. Agency staff must have reasonable caseloads in order to take on the added responsibilities of participating in coalitions.

- Although Community Coalitions must have the flexibility to tailor their service networks to meet the unique needs of their communities and families, it is important for all coalitions across the City to be working towards consistent goals and outcomes. ACS must provide guidance on whether the same goals outlined for CPIs will govern Community Coalitions under the RFP. ACS must also advise child welfare agencies, which will now be required to participate in Community Coalitions, on how to connect to these coalitions in areas where CPIs do not yet exist.
- Past experience with both Service Planning Areas (SPAs) and CPIs has shown that communities vary greatly in terms of their existing infrastructure and ability to develop active coalitions. Whereas CPIs are more successful in areas where partnerships and trust are already present, other CPIs may struggle to bring together providers and community stakeholders with differing views and agendas. As was provided for under the CPI, agencies will need targeted technical assistance in order to build partnerships, develop action plans, and conduct outreach. ACS should provide detailed information in its RFP on what type of technical assistance will be offered, particularly for agencies who take on the responsibilities of being a fiscal agent, and how agencies can access this assistance on an on-going basis.

Lastly, although Community Coalitions are a step in the right direction, they alone cannot support our families and make our children safe. The strength of these coalitions is directly related to the availability of resources in their communities. Many of these communities are faced with intense challenges, such as poverty, homelessness, and crime, as well as the limited availability of support services, including child care, mental health, and substance abuse treatment programs. Without greater attention to these underlying factors and an increased investment in the overall health of our communities and neighborhoods, the success of Community Coalitions will always be limited. **We call on ACS to join FPWA and its member agencies in advocating for greater resources and supports for our communities.**

Evidenced-Based Models

Agencies can appreciate ACS' focus on evidence-based models in this concept paper as a way of ensuring that publicly-funded programs address community needs in the most effective way possible; however, there are again serious concerns about the level of funding and resources included in the RFP to support this. Evidence-based models usually demonstrate great success because they are well-designed, *well-supported* programs. **Without the necessary investment from ACS, agencies will not be able to implement or sustain these programs. Specific agency concerns include the following:**

- Implementing evidence-based models can be extremely expensive. For example, Treatment Foster Care programs (also known as therapeutic foster care programs), *which are specifically referred to in the concept paper*, can cost almost \$25,000 per child.⁴ If ACS expects this type of programming, it must be willing to fund it.

⁴ Patricia Chamberlain, "Treatment Foster Care," *Juvenile Justice Bulletin*, Office of Juvenile Justice and Delinquency Prevention (December 1998). Available at <http://www.ncjrs.gov/html/ojjdp/173421/contents.html>. (Under the Oregon Social Learning Center (OSLC) model for the "juvenile offender population," Treatment Foster Care parents receive between \$868-\$1,023 per month and family therapy sessions cost \$2,691 per month. Youth participate in the program for an average of seven months. OSLC receives funding to cover these costs from the "State juvenile corrections division" and Medicaid. Per month program costs increase for youth populations with special needs.)

- These programs require a huge *upfront* investment of money, which will be extremely difficult for smaller agencies to accommodate. Smaller agencies may need additional start-up funding and support.
- Agencies will need assistance in integrating these models, which may take years to build up and may require infrastructural changes, such as staff training and development of an internal data management system.
- Agencies also caution ACS not to rely completely on the promise of evidenced-based models. It is yet too early to truly understand the impact these programs will have in New York City. Agencies and ACS should work together to continuously monitor and evaluate progress.

Performance Measurement

Agencies welcome the use of real-time data to measure outcomes and inform program development, as well as more meaningful communication with ACS regarding how the system as a whole can examine data trends and make improvements. There are, however, two major concerns:

- Although the data provided by ACS is extremely helpful, the process for studying and understanding this data is time-intensive. Some agencies may need resources to support an in-house data person to assist in tracking data and linking it to outcomes.
- Agencies are supportive of ACS' use of data and research, but note that front-end investments in programming are as important as investments in the performance measurement system.

Delegation of Case Management Authority

Agencies are very supportive of ACS' decision to shift final decision-making authority on cases to the agencies, which are closest to the details of each family's situation. This also works well with the Family Team Conference model, where most decisions are the result of consensus among family members, agency staff, and community stakeholders. FPWA commends ACS on the incorporation of this change into IOC and the upcoming RFP.

Sharing of Best Practices

FPWA urges ACS to provide opportunities for agencies previously engaged in either IOC or CPIs to share information about these experiences with other agencies. For instance, non-IOC agencies would greatly benefit from knowing what front-end investments (such as reducing caseloads or creating crisis intervention units) helped IOC agencies achieve reductions in step-ups. These exchanges should begin before responses to the RFP are due and continue for the first year of contracting. We understand that ACS is planning a forum this Spring for sharing IOC-related information with agencies, and we encourage ACS to build upon this to create other avenues for information-sharing. FPWA would be happy to help facilitate communication between agencies.

Challenges for Smaller Agencies and Minority-Run Agencies

Again, FPWA is extremely concerned about the preservation of smaller agencies and minority-run agencies in the child welfare system. It is essential that we recognize the value of these agencies, many of whom have been deeply committed to the work of supporting families and

protecting children for years, and ensure that they have the resources to compete in the RFP and remain viable as service providers. Smaller agencies will have a harder time implementing the changes required under the RFP and may need additional funding and technical assistance to build the necessary infrastructure.

FPWA also urges ACS to actively support minority-run agencies during this process. In its list of guiding “principles, goals, and expectations,” ACS assures us that “each family’s cultural background [will be] understood and respected.” In a system where the majority of children and families served are African-American and Latino, minority-run agencies must be supported as a vital part of this effort to ensure that services meet the cultural needs of families.

Timeframe

FPWA and its member agencies must also raise the issue of timeframe. While we again support the goals of this RFP, the changes being sought are ones that normally require *years* to implement, *not months*. Forcing agencies to scramble to make large-scale changes in such a short amount of time not only compromises their ability to execute these changes successfully, but also jeopardizes their ability to devote time and resources to those families who need assistance now.

Ideally, the timeframe must allow agencies the time necessary to thoughtfully and carefully assess their agencies and implement change, while also maintaining the same high-quality service delivery they have always offered to families in need. We urge ACS to reconsider its timeframe for overhauling the child welfare system and determine whether it is indeed in the best interest of the children and families served.

Family Court

As we move forward with this RFP, FPWA encourages ACS to use this time of change as an opportunity to strategically address continuing issues with Family Court. Caseworkers are overburdened by the number of hearings and the amount of time they must spend in court, and agencies are frustrated by court-related delays in moving children to permanency. Although we understand that the shortage of Family Court judges plays a large role, we believe that ACS should work with agencies and the Family Court to create a more seamless process.

Questions/Clarification

FPWA also asks that ACS offer greater detail on a number of aspects of the concept paper:

1. In the list of principles, goals, and expectations, ACS refers to the incorporation of “several new program models.” FPWA member agencies would like to know more about these models, including the role, structure, and responsibilities of “Rapid Intervention Teams.”
2. It is our understanding that ACS is still awaiting State approval for its IOC plan. When does the agency anticipate receiving this approval from the New York State Office of Children and Family Services and will it have an impact on the RFP process?
3. There was no specific mention of **aftercare services** in the RFP. These services are essential to supporting families once a child has left care, and FPWA member agencies would like reassurance that support for these services will be continued.
4. There was no specific mention of **“citywide” programs** in the RFP. Citywide programs providing child welfare services already exist and must be included in this contracting

process. FPWA member agencies would again like reassurance that these programs will be eligible for funding under this RFP.

5. The concept paper refers to the need for cultural understanding in the child welfare system. Please provide more information on how ACS plans to expand cultural and linguistic competency and how provider agencies can participate in this process.
6. FPWA strongly supports the expansion of Preparing Youth for Adulthood activities and asks that ACS provide more information in its RFP on what support and funding will be available to agencies serving youth aging out of care.
7. What types of “in-kind contributions” will be required of contracting agencies?

Conclusion

In general, FPWA’s child welfare member agencies are excited to join ACS in implementing innovative programs that will improve outcomes for families, including Family Team Conferencing, Community Coalitions, and other evidenced-based models. However, ACS must also realize that there are very real costs associated with these initiatives, and agencies must have the funding and technical assistance needed to support them. While we greatly appreciate the visionary thinking in this concept paper, the potential benefits for New York City’s children and families will be compromised if these grand plans are not accompanied by equally grand investments.

FPWA urges ACS to ensure that child welfare agencies are fully equipped to reach the goals supported by us all.

If you have any questions, please feel free to contact Vani Sankarapandian, Senior Policy Analyst for Early Childhood Education and Child Welfare, at vanis@fpwa.org or 212-801-1376.

Sincerely,



Fatima Goldman
Executive Director/CEO