



**Department of  
Youth & Community  
Development**

**Keith Howard  
Commissioner**

December 1, 2022

**2 Lafayette Street  
19<sup>th</sup> Floor  
New York, NY 10007**

**[www.nyc.gov/dycd](http://www.nyc.gov/dycd)**

**VIA EMAIL**

**Ken Shulman  
Assistant Comptroller  
Office of the State Comptroller  
110 State Street  
Albany, New York 12236**

**VIA EMAIL**

**Kenrick Sifontes  
Audit Director  
Office of the State Comptroller  
Division of State Government Accountability  
59 Maiden Lane, 21<sup>st</sup> Floor  
New York, New York 10038**

**Re: Status Report on the Implementation of Recommendations contained in the State Comptroller's Audit Report 2021-N-2 of the New York City Administration for Children's Service (ACS) and New York City Department of Youth and Community Development (DYCD) – Identifying, Reporting and Providing Services for Youth at Risk of Sexual Human Trafficking in New York City (Final Report): DYCD's Response**

**Dear Messrs. Shulman and Sifontes:**

The Department of Youth and Community Development (DYCD) appreciates this opportunity to review and provide the attached response detailing the progress that DYCD has made in implementing those Recommendations applicable to DYCD that are contained in the Final Report.

If you have questions regarding the response or wish to discuss the audit further, please do not hesitate to contact me.

Sincerely,

  
Keith Howard

**Attachment**

**c: Doug Guiliano, Mayor's Office of Operations  
Jennifer Fiellman, Assistant Commissioner, Administration for Children's Services  
Christopher Lahey, Acting Auditor General  
Alan Cheng, Deputy Commissioner of Administration  
Caroline Press, General Counsel  
Susan Haskell, Deputy Commissioner, Youth Services  
William Kamen, Senior Director of Internal Review**

**New York City Department of Youth and Community Development's (DYCD)**

**Status Report for December 2022**

**to The Office of the State Comptroller (OSC)**

**on DYCD's Implementation of OSC's Recommendations**

**Contained Within OSC Report 2021-N-2**

The State Comptroller's Office requested that within 180 days of the final release of its report dated June 6, 2022 (the Report) that the Commissioners of the New York City Administration for Children's Services (ACS) and the New York City Department of Youth and Community Development (DYCD) report to the State Comptroller advising what steps DYCD has taken to implement the recommendations contained in the Report and where recommendations were not implemented, the reasons why.

DYCD is only addressing the recommendations applicable to DYCD. ACS will be providing a separate response.

**RECOMMENDATIONS TO DYCD**

***Recommendation #5: Develop and enforce written policies and procedures to ensure staff and providers are adequately trained to identify, report on, and provide services to sex-trafficked victims. Periodically review training materials to ensure required topics meet DYCD's standards. Document outcomes of DYCD's reviews.***

**DYCD 180-Day Status:** DYCD reviewed its policies that cover DYCD's monitoring of provider staff training. After concluding its review, DYCD has decided to maintain its existing policies. DYCD's existing policies on monitoring provider staff training are contained in DYCD's Administrative Evaluation tool, which includes 38 indicators related to administrative program performance. Among the 38 indicators are the following four indicators for the providers' general administration of the program:

- CBO program staff enter participant data into DYCD data management systems accurately and regularly.
- CBO program staff complete data entry in DYCDConnect and submits required reports (Thrive and Safe Harbor) to RHY staff by the 5th of each month to ensure accurate reports can be retrieved.
- CBO Program management ensures that appropriate staff attends all DYCD-mandated meetings and training
- CBO Program has process in place to supervise and evaluate staff and provide professional development

Additionally, included in the 38 indicators are 28 evaluation indicators which are reviewed by DYCD's RHY Program staff during site visits of its providers. Of the 28 Onsite Administrative Review indicators, the list below includes those indicators that are related to provider staff training on identifying, reporting, and providing services to sex-trafficked victims. Completion of the Administrative Evaluation by DYCD Program staff requires that they make a sample selection of provider staff records and review the records to identify supporting documentation for each of these indicators.

- Record of staff training in sexual exploitation awareness is on file
- Statewide Register of Child Abuse and Maltreatment and Clearance Letter is on file
- Record of staff training in case records is on file
- Record of staff training in confidentiality of information is on file
- Record of staff training in youth development and youth issues is on file
- Record of staff training in RHY regulations is on file
- Record of staff training in suicide prevention is on file
- Record of staff training in child abuse prevention/reporting requirements is on file
- Record of staff training in cultural diversity awareness is on file
- Record of staff training in domestic violence awareness is on file
- Record of staff training in pregnancy prevention and parenting is on file
- Record of staff training in LGBTQ sensitivity is on file
- Record of staff training in substance abuse awareness is on file
- Record of staff training in working with youth with disabilities is on file

In addition to the monitoring of provider staff training described above, DYCD's providers are required to use a system called Participant Tracking System (PTS), in DYCDConnect, to report trafficking to DYCD; the procedures for using PTS to report trafficking were previously provided to OSC. These procedures consist of a six-page guide on creating a Safe Harbor/Commercially Sexually Exploited Children Report. As a general training exercise for providers, on October 20, 2022, DYCD reviewed the procedures for reporting in PTS with its providers.

In support of ongoing Runaway and Homeless Youth (RHY) provider staff training needs, DYCD hosted the New York State Office of Children and Family Services (OCFS) at the required DYCD RHY monthly provider meeting on November 17, 2022. OCFS reviewed the computer-based training opportunities offered by NYS, including on trafficking, with both DYCD providers and DYCD staff. Furthermore, OCFS will offer a refresher training to RHY provider staff on the requirements for reporting suspected child abuse to the State Central Registry (SCR).

To offer additional materials in support of provider training requirements, in January 2023, ACS will be hosting a virtual "NYC Child Trafficking Prevention Conference". The conference will include more than a dozen workshops, including "Understanding Child Trafficking" which will be free and accessible to all DYCD RHY providers and staff, who will be strongly encouraged to participate. DYCD RHY staff will join this event to obtain the latest information involving trafficking education and awareness, and to update knowledge of relevant materials.

***Recommendation #6: Develop procedures for reviewing the accuracy and consistency of DYCD's sex trafficking reporting.***

**DYCD 180-Day Status:** At the end of March 2022, DYCD worked with ACS to ensure that information provided to ACS and reported to City Council is properly reported in accordance with Local Law 41 and will continue to collaborate with stakeholders to ensure accurate reporting on circumstances of trafficking among youth and young adults in RHY programs.

The steps DYCD follows for reviewing the accuracy and consistency of its sex trafficking report data were previously provided to OSC. Those steps are:

- The Runaway & Homeless Youth Safe Harbour/Commercially Exploited Children (CSEC) report in PTS incorporates all providers' information for the period. The RHY director of operations and data management or deputy director reviews the data and uses the data from the CSEC report to create the tables for the LL41 report.
- DYCD staff email the data table internally to DYCD RHY and Youth Services leadership Supervisory staff for review and approval.
- DYCD staff email the CSEC data table to ACS for inclusion in ACS's final report (LL41).
- ACS then emails the final report (LL41) to DYCD staff to confirm the accuracy of DYCD's data within the final report.
- DYCD staff review, then share internally with DYCD senior leadership for Youth Services for review, feedback, and/or approval; and
- Once DYCD leadership approves, then DYCD communicates to ACS that there are no additional feedback/edits within the final LL41 report (if there is feedback, DYCD shares it with ACS for edits)

***Recommendation #7: Establish and enforce written procedures for providers to screen youth for indicators of trafficking.***

**DYCD 180-Day Status:** DYCD does not require providers to use a specific screening tool but will consider suggesting or requiring providers to use one or more screening tools in either the next RHY Request for Proposals or in connection with an earlier contract action (e.g., renewals).

In support of ongoing RHY provider staff training needs, DYCD hosted OCFS at the DYCD RHY provider meeting on November 17, 2022, to review the computer-based training opportunities offered by New York State, including on trafficking, with both DYCD providers and DYCD staff. Furthermore, OCFS will offer a refresher training to RHY provider staff on the requirements for reporting suspected child abuse to the State Central Registry (SCR).

***Recommendation #8: Actively participate in procedures for reporting on sex-trafficked and at-risk youth to NYC governance.***

**DYCD 180-Day Status:** DYCD works with ACS to ensure proper reporting in accordance with Local Law 41 and will continue to collaborate with stakeholders to ensure accurate reporting on circumstances of trafficking among youth and young adults in RHY programs. For each annual Local Law 41 reporting period, DYCD provides information to ACS which is included in the report to City Council.

***Recommendation #9: Collaborate with ACS and other stakeholders to reassess the process for gathering data and completing the LL41 annual reports. Make changes to improve the clarity and accuracy of the reports, as appropriate.***

**DYCD 180-Day Status:** DYCD's collection system identifies newly reported cases of Commercial Sexual Exploitation of Children and is the basis for Local Law 41 reporting. In preparation for the next annual Local Law 41 report, DYCD will work with ACS staff this winter to discuss current procedures in advance of a completed report for Spring 2023. DYCD is exploring the feasibility of adding a record in its reporting system to indicate that no new cases were reported.