



December 6, 2022

Kenrick Sifontes, Audit Director
Office of the State Comptroller
Division of State Government Accountability
59 Maiden Lane - 21st Floor
New York, NY 10038

Jess Dannhauser
Commissioner

Eden Hauslaib
Chief Accountability Officer

Jennifer Fiellman
Assistant Commissioner

150 William Street
7th Floor
New York, NY 10038

Re: State Comptroller's Audit Report 2021-N-2

Dear Mr. Sifontes,

Pursuant to the request within the audit report entitled *Identifying, Reporting and Providing Services for Youth at Risk of Sexual Human Trafficking in New York City* from the State of New York Office of the State Comptroller for an update advising what steps were taken to implement the recommendations contained therein, and where recommendations were not implemented, the reasons why, the City of New York (NYC) Administration for Children's Services (ACS) is providing the response below.

Audit Report recommendations are as follows:

Recommendation 1: Enforce ACS' child screening policies and procedures, thereby ensuring staff and providers screen youth under its supervision as required.

ACS Response to Recommendation 1: The Office of Child Trafficking Prevention and Policy has continued to provide trafficking policy and Child Trafficking Database trainings and technical support to assist ACS and provider agency staff with screening ability. The trainings are advertised through the ACS Insider (Intranet), Provider Bulletin and ACS Foster Care Update that is sent weekly to the providers. The technical support is available through request to the CTDB shared mailbox: CTDB@acs.nyc.gov. As the Child Trafficking Database remains our electronic system with the ability to capture and manage required screenings, we plan to further enforce its use through the upcoming launch of the Child Trafficking Database E-learning and through ongoing re-assessment and revision of trafficking policy training within ACS and contracted agency core curricula.

Recommendation 2: Document and enforce procedures to ensure staff and providers comply with Administrative Directive 15-OCFS-ADM-16 and are adequately trained to identify, report on, and provide services to sex trafficked and at-risk youth.

ACS Response to Recommendation 2: ACS will widely circulate the E-training module created in-house upon its launch in January 2023. We are in ongoing discussions with our oversight, OCFS, regarding training requirements of our staff and contracted agency staff.

In 2022, 1,025 attendees attended 3-hour Policy-CTDB trainings, with an additional 154 attendees having attended four specialty screening related presentations. The Policy-CTDB trainings will continue in 2023, even with the launch of the CTDB E-learning.

Recommendation 3: Develop procedures for reviewing the accuracy and consistency of ACS' sex trafficking reporting.

ACS Response to Recommendation 3: ACS continues to make our mandated reporting to the New York City Council on an annual basis and fulfills any need for additional information or any inquiries regarding the data.

Recommendation 4: Work with OCFS, DYCD and other stakeholders to conduct a needs assessment to determine if strategies and resources are being used to identify and mitigate the impact of child sexual exploitation in NYC.

ACS Response to Recommendation 4: ACS has continued to collaborate with our city and state partners.

We would like to reiterate ACS's innovative and best-case practice work in the area of child trafficking. ACS is committed to protecting and supporting all the children we serve.

Thank you for your support of ACS' work with NYC children and families.

Sincerely yours.

A handwritten signature in blue ink, appearing to read "Jennifer Fiellman".

Jennifer Fiellman
Assistant Commissioner