

New York State Comptroller  
THOMAS P. DiNAPOLI

# **New York City Administration for Children's Services & New York City Department of Youth and Community Development**

Identifying, Reporting, and Providing  
Services for Youth at Risk of Sexual  
Human Trafficking in New York City  
(Follow-Up)

**July 2026 | Report 2025-F-14**

Prepared by the Division of State Government Accountability

## Contents

|                                                         |   |
|---------------------------------------------------------|---|
| Authority                                               | 3 |
| Background, Objective, and Scope                        | 3 |
| Summary Conclusions and Status of Audit Recommendations | 5 |
| Reporting Requirements                                  | 8 |

## Authority

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article III of the General Municipal Law, we have followed up on the actions taken by officials of the New York City Administration for Children's Services and the New York City Department of Youth and Community Development to implement the recommendations contained in our initial audit report, *Identifying, Reporting, and Providing Services for Youth at Risk of Sexual Human Trafficking in New York City* (Report [2021-N-2](#)).

## Background, Objective, and Scope

Children and youth are among society's most valuable resources. However, because of psychological, economic, and/or social factors, they could become victims of sexual exploitation. Reliable data on the commercial sexual exploitation of children (CSEC) does not exist because of the underground (in-the-shadows) nature of this crime. New York City (NYC) reported an average of 2,249 children each year were sexually exploited or at risk of sexual exploitation during the 4-year period from January 2017 through December 2020. This number declined to an average of 730 children per year during the subsequent 4-year period from January 2021 through December 2024.

Human trafficking involves controlling a person through force, fraud, or coercion for the purpose of forced labor, commercial sex, or both. Child sex trafficking, or CSEC, involves inducing a child under the age of 18 to perform a commercial sex act in exchange for anything of value. Child sex trafficking is increasingly recognized as a profound legal and societal problem.

In September 2008, the Safe Harbour for Exploited Children Act (Safe Harbour) was signed into law in New York State. It became effective in 2010, making New York the first state in the nation to recognize sexually exploited minors as victims and not perpetrators of crimes.

In 2014, the U.S. Congress enacted the Preventing Sex Trafficking and Strengthening Families Act, which requires the screening of children within the child welfare system for potential sex trafficking and the timely reporting of sex trafficking incidents to law enforcement. It also requires data collection on sex-trafficked and at-risk youth. In 2015, the New York State Office of Children and Family Services (OCFS) issued Administrative Directive 15-OCFS-ADM-16: Requirements to Identify, Document, Report and Provide Services to Child Sex Trafficking Victims. This Administrative Directive assists Local Departments of Social Services, including the NYC Administration for Children Services (ACS)—which is overseen by OCFS—and voluntary agencies, on how to identify, report on, and provide services to exploited children.

In 2013, OCFS began allocating Safe Harbour funds annually to certain counties—\$1.6 million in 2013, \$1.7 million in 2014, and \$3 million in 2015 to 2020—to leverage and strengthen existing systems and to create a more effective and efficient response to youth who have experienced or are vulnerable to commercial sexual exploitation or trafficking. The goal was to bring counties up to a functioning level and provide programmatic support that would allow the counties time to integrate policies and procedures into practice and to be able to continue serving the youth once

the funding is reduced. The annual funding was reduced to \$2 million in 2021. ACS was selected to plan and distribute these funds in NYC. According to ACS, the annual allocation of the Safe Harbour funding to ACS has declined significantly, decreasing from \$622,220 in 2013 to \$50,000 in both 2024 and 2025. For 2026, Safe Harbor funds decreased again to approximately \$17,000.

Until 2020, ACS provided some of the funds to the NYC Department of Youth and Community Development (DYCD) for developing and providing services to sexually exploited youth. DYCD contracts with community-based organizations (providers) to provide various youth welfare services, such as after-school and employment programs, school-based community centers, and runaway and homeless youth services.

Despite the decrease in funding, ACS officials reported that they have worked to increase awareness of child trafficking by expanding training opportunities for staff, providers, other governmental agencies, and the community at large, as well as conducting awareness campaigns. For example, in 2024 they offered 87 trainings on child trafficking and related topics, filling more than 12,000 training seats. In 2025, the number of trainings increased to 90, filling over 16,000 training seats. ACS officials emphasized that building awareness is critical to child safety, noting that people can't protect children if they are unaware of what child trafficking is or the importance of screening.

As part of their reporting requirements under Local Law 41 (LL41) of 2016, both DYCD and ACS are required to submit an annual report to the Speaker of the NYC Council, documenting the number of youth in contact with DYCD and ACS who are referred as, self-report as, or are later determined by DYCD or ACS to be sexually exploited children.

The objective of our initial audit, issued on June 6, 2022, was to determine whether ACS and DYCD identify, report on, and provide services for victims of child sex trafficking and those at risk of child sex trafficking. Our audit covered the period from January 2017 through January 2022 for ACS and from January 2017 through September 2021 for DYCD. ACS and DYCD have developed, promoted, implemented, and funded initiatives and programs to improve the safety and well-being of NYC children and to mitigate the sexual exploitation of children. However, the audit found both agencies need to do more to identify, report on, and provide services to child sex trafficking victims and those at risk. For example, we found ACS' staff and providers failed to support the number of sex-trafficking screenings completed for the period from February 15, 2017 through December 31, 2020. In addition, ACS and DYCD did not provide support for the sex-trafficking numbers in their LL41 reports for calendar years 2017 through 2020. We also found that both agencies did not adequately monitor staff and/or providers to ensure mandatory training was completed or completed timely. Moreover, neither agency provided documentation to support that sex-trafficked or at-risk youth received adequate services, such as safe housing and medical, mental health, legal, educational, and/or vocational assistance.

The objective of our follow-up was to assess the extent of implementation, as of March 6, 2026, of the nine recommendations (the first four recommendations were addressed to ACS, and recommendations five through nine were addressed to DYCD) included in our initial audit report.

## Summary Conclusions and Status of Audit Recommendations

ACS and DYCD officials have made limited progress in addressing the issues identified in the initial audit report. Of the initial report's nine audit recommendations, two (addressed to DYCD) were implemented, three (two addressed to ACS and one to DYCD) were partially implemented, and four were not implemented (two addressed to each ACS and DYCD).

### Follow-Up Observations

#### To ACS:

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

**Status** – Not Implemented

**Agency Action** – ACS officials stated they enforce the agency's child screening policy by continuing to provide trafficking policy and Child Trafficking Database (CTDB) training, as well as technical support to assist ACS and provider agency staff in conducting screenings. The CTDB is the electronic system used to capture and manage screening information. ACS officials indicated that screening policies will be further enforced through the upcoming launch of a CTDB E-learning program and through ongoing reassessment and revisions to the trafficking policy training. However, ACS officials did not provide documentation demonstrating that these enforcement efforts are occurring or that they are being implemented.

To determine whether the screening policy was being followed, we requested information on the number of youth in ACS' care who were required to be screened and the number who were actually screened. ACS officials responded that they did not have this information, in part due to the different screening tools used by New York State and ACS. Without this data, there is no assurance that youth who are required to be screened are actually being screened. As a result, ACS officials did not provide sufficient support that they are enforcing their child screening policies and procedures to ensure that required screenings are conducted.

**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.

**Status** – Partially Implemented

**Agency Action** – OCFS Administrative Directive 15-OCFS-ADM-16 requires current ACS foster care, child protective and preventive staff, and new hires to complete two training courses within 180 days of their start date: "Human Trafficking/Commercially Sexually Exploited Children (CSEC): An Overview" and "Child Welfare Requirements for Identifying and Working with Sex Trafficking Victims." Although ACS officials were able to provide training records showing staff who completed or did not complete these two mandated trainings, they do not ensure that it is completed. ACS officials stated that they only track and monitor trainings they offer, not those mandated by OCFS. However, they provided support about the trainings on child sex-trafficking and related topics offered to their staff and providers as well as documentation showing

reminders are distributed through weekly communications, such as in the ACS Provider Bulletin, the ACS E-Bulletin, and foster care updates.

Because ACS does not actively track or monitor completion of these two OCFS-mandated trainings, we conducted our own review to determine whether staff were meeting the requirement. We reviewed training records for a sample of 20 employees who were employed between January 1, 2023 and September 5, 2025. Of the 20 employees reviewed, 16 completed both trainings within the required 180-day time frame, two completed the trainings after the required time frame, and two left the agency before the training was due.

Although these results show improvement in staff compliance since the initial audit, ACS should take a more proactive role in tracking and monitoring completion of the two OCFS-mandated trainings to ensure that all staff are adequately trained to identify, report on, and provide services to sex-trafficked and at-risk youth.

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

**Status** – Not Implemented

**Agency Action** – ACS officials assert that they have had procedures in place since 2020 for preparing the LL41 annual report to the City Council and that these procedures have not changed except for a procedural update made in March 2024. However, the documentation provided pertains to the collection of data rather than outlining a review process for the preparation of reports.

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

**Status** – Partially Implemented

**Agency Action** – ACS officials stated that they collaborate with other government agencies and community organizations on strategies to mitigate the impact of child sexual exploitation among youth involved in ACS' child welfare system but not to children citywide. To support its statement, ACS provided a list of nine agencies/organizations with whom they collaborate. We selected six of these agencies/organizations to review their engagement and requested supporting documentation such as meeting agendas, minutes and attendance sheets, event brochures, and email communications. Of the six collaborations requested, ACS provided limited documentation, specifically email communications for three agencies/organizations reflecting their discussions. However, for the three other agencies/organizations, ACS officials stated that no written agendas were prepared or that related email communications had been lost.

**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.

**Status** – Partially Implemented

**Agency Action** – DYCD has not developed written policies and procedures to ensure staff and providers are adequately trained to identify, report on, and provide services to sex-trafficked victims. In the absence of written policies and procedures, we could not determine whether such training requirements are being enforced.

Although policies and procedures are lacking, DYCD officials provided email communications showing that they periodically inform staff and providers about available training opportunities (e.g., registration information for trainings on child trafficking and related topics). Officials also provided the results of an administration review conducted on one provider that included several subject areas, including training. However, these activities alone are not sufficient to demonstrate that DYCD is ensuring that its staff as well as those at the providers are adequately trained to identify, report on, and provide services to sex-trafficked victims.

Furthermore, DYCD officials did not provide documentation showing that training materials were periodically reviewed to ensure that required topics meet DYCD’s standards, nor did they document the outcomes of any such reviews.

**Recommendation 6** – Develop procedures for reviewing the accuracy and consistency of DYCD’s sex trafficking reporting.

**Status** – Implemented

**Agency Action** – DYCD officials provided information outlining six general steps they have developed for reviewing the accuracy and consistency of their sex-trafficking reporting data, including who is responsible for reviewing the data and providing feedback.

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

**Status** – Not Implemented

**Agency Action** – DYCD officials have not established written procedures for providers to screen youth for indicators of trafficking. Officials stated that they are currently reviewing a concept paper for a Request for Proposal (RFP) that would establish written screening procedures, but that it had not yet been finalized. However, despite our requests, DYCD did not provide any written documentation, such as a draft concept paper or an RFP, to support this claim. Therefore, without established written procedures, DYCD officials can’t ensure that providers are conducting trafficking screenings or are enforcing compliance with such requirements.

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

**Status** – Not Implemented

**Agency Action** – DYCD officials stated that they work with ACS to ensure proper reporting in accordance with LL41 and will continue to collaborate with stakeholders to ensure accurate reporting on circumstances of trafficking among youth and young adults in Runaway and Homeless Youth programs. However, they did not provide any documentation to support these assertions.

**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.

**Status** – Implemented

**Agency Action** – DYCD officials stated that Runaway and Homeless Youth service providers are the key stakeholders and the primary source for data used to complete the LL41 reports. To support this assertion, they provided documentation demonstrating that they have engaged with providers regarding the process and their responsibility for gathering data and completing the LL41 annual reports, including monthly reminder emails related to completing CSEC reports. In addition, DYCD officials provided documentation showing that a new field was added to the Runaway and Homeless Youth Safe Harbour Reports. They asserted that the new field should improve the clarity and accuracy of the information reported.

## Reporting Requirements

ACS and DYCD officials are requested, but not required, to provide information about any actions planned to address the unresolved issues discussed in this follow-up within 30 days of the report's issuance. We thank the management and staff of ACS and DYCD for the courtesies and cooperation extended to our auditors during this follow-up.



## Contact

Office of the New York State Comptroller  
110 State Street  
Albany, New York 12236

(518) 474-4044

[www.osc.ny.gov](http://www.osc.ny.gov)

Prepared by the Division of State Government Accountability

July 27, 2026

## Contributors

Andrea C. Miller – Executive Deputy Comptroller

Tina Kim – Deputy Comptroller

Stephen C. Lynch – Assistant Comptroller

## Audit Team

Kenrick Sifontes – Audit Director

Sheila Jones – Audit Manager

Dmitri Vassiliev – Audit Supervisor

Allison Dillon – Examiner-in-Charge

Manna Zhen – Senior Examiner



FOLLOW US: [osc.ny.gov/subscribe](http://osc.ny.gov/subscribe)